



UNION CARBIDE CORPORATION  
CHEMICALS AND PLASTICS

P. O. BOX 471, TEXAS CITY, TEXAS 77590

June 22, 1977

Mr. Howard G. Bergman  
Director, Enforcement Division  
U. S. Environmental Protection Agency  
First International Bank Building  
1201 Elm Street  
Dallas, TX 75270

Dear Mr. Bergman:

Subject: Vinyl Chloride Regulation, Compliance With § 61.64 (c) or (d),  
Suspension Vinyl Resins and Solvent Vinyl Resins, Termination  
of Waivers, Texas City Plant

In the original application for waivers for these two processes were two vents on solvent tanks which at the time were believed might not be able to meet the 10 ppm maximum VCM concentrations prescribed by Art. 61.64 (c) or (d). Since that time, we have been periodically monitoring these two vents in their respective units to determine if possible whether they were within prescribed limits. Testing methods and data described below indicates that both of these vents are in compliance with the regulation and that the waivers are no longer required.

1) Suspension Vinyl Process - Solvent (MEK) Wash Tank Vent § 61.64 (d),  
Compliance Schedule No. 7

This MEK wash tank vent was connected to point No. 7 of one of the two Suspension Vinyl Area VFA monitors on May 20, 1977. The vent was sampled every forty minutes until June 9, 1977 (20.3 days). There were no daily levels above 10 ppm, the average for the period was 4.6 ppm. (See attached tabulation taken from the computer print-out sheets.) The computer print-out sheets are a part of our permanent monitoring records.

2) Solvent Vinyl Process, Brine-Cooled Vent Condenser on Wash Acetone  
Storage Tanks, § 61.64 (c), Compliance Schedule No. 5

The four tanks that receive the acetone wash solvent from the auto-claves and other equipment in the process have a common vent header which leads to a brine-cooled vent condenser. Condensed organic vapors drain back to one tank and the condenser vent is fitted with a BS&B conservation control set at 6 oz/sq in pressure and 2 oz/sq in vacuum which conserves the nitrogen blanket normally introduced to the tanks at 3 oz/sq in pressure. This condenser vent was fitted with a dry gas flow meter to determine total emissions for the following periods:

- a) March 22-28, 1977; Six days, no flow detected, but nitrogen blanket had not been applied, so repeated test.

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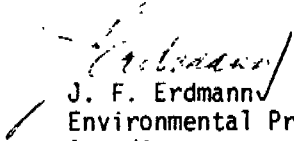
Mr. Howard G. Bergman  
June 22, 1977  
Page 2

- b) April 18-29, 1977; 12 days, no flow detected by the dry gas meter which was fitted to total all flow from the vent.

During both monitoring periods, the wash tanks were subjected to the most severe conditions under which we normally operate, but no flows were detected. We have therefore concluded that this condenser vent is in compliance and that the waiver may be terminated.

The attached Compliance Schedules have been noted as terminated effective June 20, 1977 per the above disclosures. If there are any questions, please contact me.

Very truly yours,

  
J. F. Erdmann  
Environmental Protection  
Coordinator  
(713) 945-7411, ext. 1126

JFE:ir

Attachments

cc: Mr. Cecil Bradford  
Texas Air Control Board  
8520 Shoal Creek Boulevard  
Austin, TX 78758

bcc: Mr. H. P. Brady  
Mr. M. E. Eisenhour  
Mr. A. A. Peterson/Mr. R. L. Frantz  
Mr. W. T. Gray, Jr.  
Mr. S. M. Norwood/Mr. W. A. Mazzolini  
Mr. G. E. Peeler - 124  
Mr. D. D. Robinson  
Mr. R. M. Guardiola  
Mr. J. B. Levertton/Mr. F. S. Provenzano  
Mr. R. N. Wheeler - 514

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SUSPENSION PVC PROCESS

DAILY LEVELS OF MEK WASH TANK VENT

| <u>Date</u> | <u>Level, PPM VC1</u> |
|-------------|-----------------------|
| May 20*     | 1.4                   |
| May 21      | 1.1                   |
| May 22      | 4.5                   |
| May 23      | 1.8                   |
| May 24      | 6.0                   |
| May 25      | 9.1                   |
| May 26      | 4.0                   |
| May 27      | 5.1                   |
| May 28      | 0.6                   |
| May 29      | 4.4                   |
| May 30      | 3.7                   |
| May 31      | 4.2                   |
| June 1      | 2.7                   |
| June 2      | 5.4                   |
| June 3      | 7.0                   |
| June 4      | 8.2                   |
| June 5      | 6.6                   |
| June 6      | 0.7                   |
| June 7      | 6.4                   |
| June 8      | 6.6                   |
| June 9      | <u>4.1</u>            |
| Average     | 4.6                   |

\* 8-Hours only.

A. A. Peterson  
June 14, 1977

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| <u>Applicable Regulation</u> | <u>Emission Point</u> | <u>Description</u>           |
|------------------------------|-----------------------|------------------------------|
| §61.64(d)                    | Suspension PVC Plant  | Solvent (MEK) wash tank vent |

Compliance Schedule Number 7:

- |                                                                      |                    |
|----------------------------------------------------------------------|--------------------|
| 1. Date by which equipment will be ordered                           | June 15, 1977      |
| 2. Date of commencement of on site construction                      | October 15, 1977   |
| 3. Date of completion of on site construction                        | August 15, 1978    |
| 4. Date of final compliance and date on which this waiver terminates | September 15, 1978 |

COMPLIANCE SCHEDULE, ACHIEVEMENT AND REPORTING RECORD

| Item | Date of Compliance | Remarks                                                                 |
|------|--------------------|-------------------------------------------------------------------------|
| 1    | ---                |                                                                         |
| 2    | ---                |                                                                         |
| 3    | ---                |                                                                         |
| 4    | June 20, 1977      | In compliance per letter of 6/22/77 to H. G. Bergman from J. F. Erdmann |

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| Applicable Regulation | Emission Point    | Description                                               |
|-----------------------|-------------------|-----------------------------------------------------------|
| §61.64(c)             | Solvent PVC Plant | Brine cooled vent condenser on wash acetone storage tanks |

Compliance Schedule Number 5:

- |                                                                      |                    |
|----------------------------------------------------------------------|--------------------|
| 1. Date by which equipment will be ordered                           | May 15, 1977       |
| 2. Date of commencement of on site construction                      | May 15, 1978       |
| 3. Date of completion of on site construction                        | August 15, 1978    |
| 4. Date of final compliance and date on which this waiver terminates | September 15, 1978 |

COMPLIANCE SCHEDULE, ACHIEVEMENT AND REPORTING RECORD

| Item | Date of Compliance | Remarks                                                                                                                                                                                                                                                                                            |
|------|--------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1    |                    | May 15, 1977. This item was originally submitted on the basis of limited data which indicated control might be required. Extensive testing by UCC since then has shown that no controls are needed. UCC is currently preparing a report to submit to EPA requesting that this "source" be deleted. |
| 2    | ---                |                                                                                                                                                                                                                                                                                                    |
| 3    | ---                |                                                                                                                                                                                                                                                                                                    |
| 4    | June 20, 1977      | In compliance per letter of June 22, 1977 to H. G. Bergman from J. F. Erdmann                                                                                                                                                                                                                      |

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