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Interoffice Communication

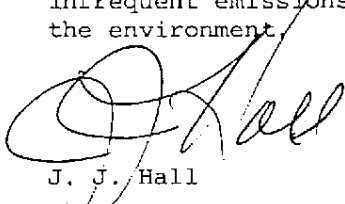
To Joy M. Rendahl - Stamford
From J. J. Hall - Houston
Date May 14, 1981
Subject CLEAN AIR ACT IMPACT STUDIES

Chemicals has a good example of a Clean Air Act inequity which may be of use to you. Because it does not fit well into the format furnished by Van Langley, I am providing a brief narrative describing the case. If you need more information, please let me know.

The Lake Charles VCM Plant operates under EPA's vinyl chloride standard.⁽¹⁾ One requirement of this standard is that the concentration of vinyl chloride in process vents must not exceed 10 ppm. An emission control system has been installed which collects and incinerates vinyl chloride emissions.

There is no provision in the standard to allow for downtime in the control system. If the incinerator were inoperable for any reason, the entire plant would have to be shut down or operate out of compliance. Therefore, a second, or standby, incinerator has been constructed. The standby incinerator must be fired continuously so that it will be ready if needed. Continuous firing of the standby incinerator requires 90 MMM BTU per year (\$300,000 of \$3.30/MCF gas).

If the standard contained a reasonable provision for maintenance/downtime, there would be no need to operate the standby incinerator. The resulting infrequent emissions of vinyl chloride would have no impact on health or the environment.


J. J. Hall

ETW

(1) (40 CFR Part 61, National Emission Standard for Hazardous Air Pollutants, National Emission Standard for Vinyl Chloride)

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