



Conoco Chemicals
Continental Oil Company
P.O. Box 91, New Highway 25
Aberdeen, Mississippi 39730

August 3, 1978

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United States Environmental Protection Agency
Suite 300
1421 Peachtree Street
Atlanta, Georgia 30309

Attention: Mr. Thommie A. Gibbs, Chief
Air Engineering Branch

Dear Sir:

This letter is written to confirm my telephone conversation with Dr. James Wu on August 1, 1978. The conversation was in reference to our operating compliance waiver under the vinyl chloride emission standard and specifically to discuss setting up a pretest meeting regarding compliance testing.

We are now preparing a "Compliance Manual" relative to our compliance plan on the vinyl chloride emission standard. This booklet is to include details of equipment which has been installed, operating procedures which are employed, compliance sampling and emission testing which will be required, and other recording and recordkeeping requirements. The booklet will further include specifics of sampling points in the process and testing methods which will be used for emission testing as is required within the standard. In some cases these may require an approval of alternative methods. The booklet can serve as a basis of discussion during the pretest meeting regarding emission testing for compliance.

This booklet will be sent to your office within the next week. I will contact your office again two weeks later to arrange the pretest meeting, thus allowing two weeks for review of the compliance testing procedures described in the booklet. We will follow as soon as feasible to conduct the actual emission testing.

Dr. Wu indicated this schedule to be acceptable for emission testing under our operating waiver. Dr. Wu also indicated that a formal extension of our plant's waiver of compliance to allow time for completion of emission testing is unnecessary. We would, however, prefer formalization of such an extension.

As previously indicated in information sent to your office, we have completed installation of the equipment designed to achieve compliance. We are now working on debugging operating procedures. In one case, process wastewater stripping, the process as installed has been unable to duplicate the original test data which showed the process capable of achieving the 10 ppm limitation. If we cannot correct this problem soon, we will be forced to ask for an extension to attempt additional process modifications.

Our final emission control device, the vent gas incinerator, is also mechanically complete and ready to operate. We have briefly tested this unit in process

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