

PE

To: Distribution

From: S. C. Racca
Date: August 1, 1985

VISTA

Interoffice
Communication

Subject: Consent Decree "Emission Control Plan"
Administrative Measures

As a result of the USA vs. Conoco Consent Decree recently entered into by Vista, several "Administrative Measures" intended to reduce/eliminate the emissions of vinyl chloride due to relief valve releases and incinerator bypasses must be committed to by the VCM Plant. These measures include formal Operator Training programs formal Operating procedures, a formal Preventive Maintenance program, a formal Notification of States program, and Miscellaneous Inspection Programs. By formal it is meant an in-writing commitment concerning the scope of each program, the frequency for accomplishment of all identified action steps, and written documentation of completion of each action step.

As a result of discussions during the July 11 and previous meetings concerning identified "Administrative Measures", the following division of duties/responsibilities is established:

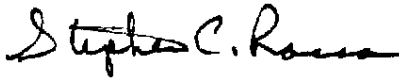
- 1) Operations Department (MLA) responsible for development and implementation of:
 - a) Operator Training Programs
 - b) Operating Procedures
 - c) Miscellaneous Inspection Programs
- 2) Mechanical Department (JRH) responsible for development and implementation of:
 - a) Preventive Maintenance Programs
 - b) Miscellaneous Inspection Programs
- 3) Process Engineering Department (SCR) responsible for development and implementation of:
 - a) Notification of Status Program

Attached are specific measures which must be included in each of these programs. They are broken down into

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two categories - measures taken and measures to be taken. Please ensure that all measures taken have been, and continue to be, implemented on a formal (including up-to-date documentation) basis. All measures to be taken must be complete and in-place within 6 months after the "Emission Control Plan" becomes "an enforceable addendum to the Consent Decree" (expected to be between December 1, 1985 and February 1, 1986). Also, an outline of the Operator Training programs (including commitments concerning number of hours of training per year) and Preventive Maintenance program (including frequencies for instrument and mechanical equipment PM action steps) is needed by September 3. When an identified measure is completed please inform the Process Engineering Department so that it can be noted in the quarterly progress reports as required by the Decree.

If there are any questions or comments, please notify me by August 12, 1985.



Stephen C. Racca
Process Engineer

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RAC-PEM-RB-MCM-MLA-JRH-WPS

cc: SRA-PLF-PE-JCL-WLM

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TABLE I. ADMINISTRATIVE MEASURES TAKEN AND TO BE
TAKEN BY THE OPERATIONS DEPARTMENT

I. Measures Taken

A. Operator Training

- 1) Annual relief valve release avoidance training.
- 2) Special counseling of operators following any incident which did lead, or could have led, to a relief valve discharge.
- 3) Specialized training program concerning the properties of liquid-full systems with specific emphasis on how those properties relate to overpressuring caused by failure to properly align block valves while putting a flake caustic dryer on line and while switching check tanks.
- 4) Each operator undergoes comprehensive training and testing while progressing from one position to another.

B. Operating Procedures

- 1) Modification of start-up sequence procedure for removing nitrogen from the HCl column following an inventory control shutdown.
- 2) Development of furnace clearing procedure for venting nitrogen prior to start-up.
- 3) General procedure for removal of nitrogen in process equipment before, or during, start-up.
- 4) Establishment of specific procedures to limit impurities in the ethylene used as reactor feedstock by the ethylene feedstock supplier at the request of the VCM Plant.

C. Miscellaneous Inspections

- 1) Routine monitoring of the pressure drop across the flake caustic dryers and appropriate corrective action when increased pressure drop is observed.
- 2) Addition of caustic decanter high pressure alarm switch to the "blind list" (used to ensure blinds are removed prior to start-up following turnarounds) in July, 1982.
- 3) Pre-startup inspections prior to putting new equipment in service.
- 4) Bi-weekly inspections of tell-tale pressure gauges on relief valve rupture disc assemblies.

D. Miscellaneous Measures

- 1) Institution of formal incinerator bypass investigations by operations supervisory personnel. These investigations include a detailed report of each bypass incident and a written corrective action plan.

II. Measures to Be Taken

A. Operator Training

- 1) Training program related to prevention of incinerator bypasses will be formalized. It will include discussions of past bypasses, their cause, and appropriate preventive measures.

B. Operating Procedure

- 1) Procedures for minimizing the potential for incinerator bypasses due to routine and emergency/non-routine vents will be reviewed and updated.

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C. Miscellaneous Measures

- 1) The chlorine supplier will be formally notified of the impact of off-specification chlorine on incinerator operation and advance warning by the supplier will be given to Vista pursuant to the supply contract.

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TABLE II. ADMINISTRATIVE MEASURES TAKEN AND TO BE
TAKEN BY THE MECHANICAL DEPARTMENT

I. Measures Taken

A. Preventive Maintenance

- 1) Conduct periodic check of relief valves during turnarounds by an outside contractor. This check is to ensure that all relief valves operate at their rated pressure and that they are in good mechanical condition.
- 2) Calibration of instrumentation to ensure that it is functioning properly and will alert of possible overpressure conditions.

B. Miscellaneous Inspections

- 1) All in-plant maintenance on relief valves is overseen by a certified relief valve inspector employed by the plant.
- 2) Following construction and installation of new equipment and/or replacement of existing equipment, the maintenance department's check-out procedure includes visual inspection along with hydrotesting and/or weld X-rays.

C. Miscellaneous Measures

- 1) Pre-torqued rupture disc assemblies are used to prevent damage to the disc during installation

II. Measures to be Taken

A. Preventive Maintenance

- 1) The existing plant-wide routine maintenance program will be reviewed and updated to specifically include instrument and mechanical items related to incinerator shutdown prevention.

TABLE III. ADMINISTRATIVE MEASURES TAKEN AND TO BE
TAKEN BY THE PROCESS ENGINEERING DEPT.

I. Measures Taken

A. Miscellaneous Measures

- 1) Warning signs have been installed near the start buttons of five pumps in vinyl chloride service. These signs warn operators to check valve line-up before starting the pump to prevent a possible VCM relief valve discharge.

II. Measures to be Taken

A. Notification of Status

- 1) Institute a formal Notification of Status program to ensure that administrative measures identified herein are conducted in a timely manner.