



RAC

Interoffice Communication

To Environmental File
From S. J. Reynolds
Date December 7, 1983
Subject HCL VENTING FOLLOWING UNSCHEDULED SHUTDOWN
OF OXY ON DECEMBER 4, 1983
REPORTABLE SUPERFUND INCIDENT
NON-REPORTABLE STATE 17.11 INCIDENT

On December 4, 1983 at 2:30 am an unscheduled automatic shutdown of the oxychlorination system occurred due to a low $\text{HCl}:\text{O}_2$ ratio caused by a momentary interruption or "Blip" in the HCl flow while putting T-204 back in service. HCl venting from the HCl column Pressure Controller, PRC-216A, took place for six hours following the oxy shutdown until the cracking furnace feed rates had been lowered, the HCl column stabilized, and a level built-up in T-204.

The total amount of HCl vented from the column to the Vent Scrubber, C-500, was approximately 40,800 lbs., of which 10,200 lbs. were emitted to the atmosphere (a 75% HCl removal efficiency of C-500 was used). The maximum hourly HCl vent from C-500 was calculated to be 2,255 lbs./hr. which was below the 2331.8 lbs./hr. allowed by our EIQ permit for unscheduled oxy shutdowns and also below the 2831.8 lbs./hr. limit interpreted under State of Louisiana Air Quality Regulations Section 17.11. Therefore, this does not constitute a reportable 17.11 incident. However, the total 10,200 lbs. of HCl emitted is above the 5000 lbs. reportable quantity set under the Superfund regulations. This occurrence was reported to the Coast Guard National Response Center at 9:30 am on December 4, 1983 as required by Superfund.

An account of the telephone call to the Superfund NRC and a calculation of the quantity of HCl released are attached. Please contact me if there are any questions.

S. J. Reynolds

S. J. Reynolds
Process Engineer

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cc: RAC-JWW-MLA-MCM-RB-DLD-MGH

CCR 000018761