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Air Quality Control Region 7
5555 West Loop, Suite 300
Bellaire, Texas 77401
713/666-4964

RECEIVED

FEB 5

FSP

February 4, 1985

Mr. F. S. Provenzano
Plant Manager
Union Carbide Corporation
Post Office Box 471
Texas City, Texas 77590

RECEIVED
FEB 9 1985

H-E DEPT.

Re: Notice of Violation
Account No. GB-0016-J

Dear Mr. Provenzano

This is to acknowledge the receipt of your vinyl chloride monomer (VCM) relief valve discharge report indicating that on January 7, 1985, approximately 114 pounds of VCM were discharged to the atmosphere from the safety relief valves on the dilution tank (SRV "A") and the stripping still (SRV "B"). After reviewing this report, it was determined that this release was preventable; therefore, it is in violation of National Emissions Standards for Hazardous Air Pollutants (NESHAP) promulgated for VCM in Title 40 Code of Federal Regulations Part 61 (40 CFR 61), Subpart F. Specifically, this release constituted a violation of NESHAP Rule 61.65(a), as well as Board General Rule 101.20 which requires that your plant comply with all applicable NESHAP Regulations. Copies of the referenced rules are enclosed. Verbal notification of these violations was given to Mr. Jack Erdmann of your company on January 18, 1985 by Mr. J. C. Williams of this office.

The Texas Clean Air Act, Section 4.01(c), subjects any person who violates any provision of the Act, or any Board Rule, Regulation, or Order to civil penalties of \$50 to \$1000 for each day and for each act of violation as a court of law may assess.



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Mr. F. S. Provenzano

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February 4, 1985

An Administrative Enforcement Conference (AEC) is scheduled for February 21, 1985 at 10:00 a.m. in the Region 7 office. The purpose of the conference is to provide you an opportunity to discuss these violations and to present a comprehensive compliance plan. You are requested to submit prior to or at the AEC a compliance plan in written form addressing these violations cited at the plant. At a minimum, we expect the plan to include the following:

1. A block diagram showing the equipment and the position of the relief valve involved in this release;
2. Calculations of the amount of VCM released;
3. Measures taken to minimize quantity and duration of the release;
4. Measures that have been or will be taken to prevent recurrence; and
5. Dates of initiation and completion of any changes or on-site installation of any equipment.

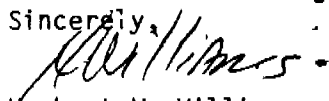
In addition, we would like to discuss at the AEC the previous unresolved violations referenced in our letters of April 19, 1984 and May 24, 1984. Specifically, these include violations of :

1. Regulation V, Rule 115.101 - Tank No. BW-18;
2. Regulation V, Rule 115.162 - the acetic esters process vent in the isopropanol unit; and
3. Regulation VI, Rule 116.4 and Permit No. R-8203, General Provision No. 7(B) - the Low Pressure Oxo No. 11 unit cooling tower sampling.

Following the AEC, I will submit our recommendations to Mr. James C. Myers, P.E., Director, Enforcement Group, based on your compliance plan. Pursuant to the agency's guidelines on compliance and enforcement matters, our recommendations may be for administrative action, or formal action which could include the calling of a public hearing or initiation of legal action.

If you have any questions concerning this matter, please feel free to contact us.

Sincerely,


Herbert W. Williams, Jr.
Regional Director

Enclosures

cc: Mr. James C. Myers, P.E. Director, Enforcement Group, Austin
Mr. Sabino Gomez, M.P.H., Director, Compliance Division, Austin
Ms. Donna Ascenzi, Chief, Technical Section, Air and Water
Management Division, EPA, Region VI, Dallas
Mr. Ed Ibert, Ph.D., Director, Environmental Control Services,
Galveston County Health District, La Marque

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