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VCM TECH CTR

VISTA

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SUBJ: EPA/EER FLARE TEST BURNING VINYL CHLORIDE

I was recently contacted by Bruce Davis of Exxon regarding flare tests being done for EPA by a contractor, Energy and Environmental Research (EER). Bruce was instrumental in organizing flare tests for CMA at John Zink in Tulsa. As you are aware that piece of work persuaded EPA to propose flares as acceptable control technology in several recent NSPSs and the Benzene NESHAPs. The test at Zink was done burning a propane/propylene mixture.

To build on the CMA test, EPA has allocated funds to test several other compounds at EER's El Toro, CA location. This work is currently in progress and Bruce Davis continues to work with EPA and the contractor providing industrial perspective.

Bruce informs me that EPA intends to test vinyl chloride at the EER flare test facility. A matrix of test conditions varying VCM concentration, velocity, and steam addition is being proposed. Vinyl chloride concentration will be adjusted using propane and nitrogen.

Dow & VCM II is one

I'm aware of at least three VI members using flares. I assume other companies would consider flare use if adequate data was available. This test burn is likely to define maximum VCM concentration and maximum velocity below which good destruction efficiency occurs.

I think the vinyl chloride industry has a stake in the outcome of this work. A poorly designed test could generate results that could virtually eliminate flares for VCM destruction in every case. The industry should provide EPA and EER guidance on the range of VCM in gas streams likely to be flared and the volumetric flow rate in those cases.

The Vinyl Institute should play a role in this study either through the Manufacturing Practices Committee or an Ad Hoc Committee of interested members. I do not anticipate this activity would involve a financial commitment by the Vinyl Institute or the member companies.

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The EPA contact on the flare study is Bruce Tichenor in RTP (919)541-2991. The Project Manager for EER is Dr. John Pohl in Irvine, CA (714)859-8851. I'm told by Bruce Davis that they are open to contact from trade associations or individual companies and would probably welcome assistance. Contact with EPA and EER should probably be made fairly soon to discuss timing of the VCM flare test.

I appreciate your consideration of this matter. Please give me a call at (713)531-3446 with your thoughts.

Sincerely,


Joseph C. Ledvina, Director
Environmental Activities

cc John Barr - Air Products
Bailey Barton - Borden
W. C. Holbrook - BFG
Jim Kochtick - Tenneco
Ken Kamoroski - PPG
Bob Oubre - Dow
Jim Mullins - Shell