

Interoffice Communication

To Distribution
From John Friend
Date September 13, 1978
Subject EPA COMPLIANCE

In addition to the recent EPA emissions test, there are other items that must be put into Plant practice to achieve compliance with the entire EPA VCM Standard. We expect to have an EPA compliance inspection within the next few weeks. This inspection may be conducted for EPA by a contractor, GCA Technology of Bedford, Massachusetts. Actually, full compliance was required beginning September 1 for our Plant.

By copy of this letter, you are requested to attend a meeting in the Conference Room at 10:00 A.M., September 15. The purpose of the meeting is to discuss the items required for compliance, determine our status of implementation of each item and assign responsibility for each item. In addition to normal operation of the EPA systems for emission control (already complete), the following items will be discussed (individual responsible for each item is included in parantheses):

1. Standard operating procedures for control of fugitive emissions -- the Operating and Maintenance Procedures Manual has been revised in certain areas and a general section added (Section XX) in order to comply with the requirement for these control procedures.
 - a) Operations training (Process Superintendent).
 - b) Maintenance training (Mechanical Superintendent).
2. Leak detection and elimination plan -- Section XX of the Operating and Maintenance Procedures Manual includes part of this plan.
 - a) Operations response to leaks detected by the fixed point monitor system and maintenance of the "leak" log book (Process Superintendent).
 - b) Routine (weekly) leak survey by Maintenance (Mechanical Superintendent).
3. Emergency relief discharge record (Safety Director).
4. Fixed point monitor's strip charts -- must be dated daily and saved for at least two years (Process Superintendent).
5. Fixed point monitor maintenance -- requires a log book record of all maintenance, a daily span check, appropriate calibration, supply and use of standard gases, etc. (Mechanical Superintendent).
6. Portable hydrocarbon detector maintenance -- requires appropriate calibration, log book record of maintenance, etc. (Mechanical Superintendent).

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7. Emissions test data and reports -- must be saved for two years (Chief Process Engineer).
8. Reactor/batch data -- the following must be appropriately labeled and saved for two years for each batch (Process Superintendent).
 - a) Batch sheet.
 - b) Reactor pressure and temperature strip chart.
 - c) Recovery system pressure and steam stripping strip charts.
 - d) EPA system flow strip chart.
9. Water stripper data -- the stripper's pressure and temperature strip charts must be dated daily and saved for two years (Process Superintendent).

Lee Hoffman has studied the Standard with emphasis on the types of requirements listed above. Any information or assistance concerning these matters can be obtained from Lee or Dick Frohreich.


JOHN FRIEND
Plant Manager

JF-spt

Distribution: AWS, RAF, KLF, JWW, REB, DPB, LAH

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