



9/19/77 → S.C. L. 1977 →
what do you want to do
about this? - E

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

SEP 13 1977

Mr. J. F. Erdmann
Environmental Protection Coordinator
Union Carbide Corporation
Chemicals and Plastics
P. O. Box 471
Texas City, Texas 77590

RECEIVED
SEP 19 1977

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SEP 19 1977

M. E. EISENHOUR

Re: Freedom of Information Request
Number 120-77

Dear Mr. Erdmann:

This is in response to your letter of August 22, 1977, for copies of all documents concerning the vinyl chloride emission standard filed with the U.S. Environmental Protection Agency (U.S. EPA) by or on behalf of the B. F. Goodrich Company in Avon Lake, Ohio.

I have made an initial determination to deny your request for information regarding the B. F. Goodrich Company plant. These records are presently exempt from disclosure under 40 C.F.R. Part 2, Section 2.204(d)(1), due to the existence of business confidentiality claims. Since this information may be entitled to confidential treatment, further inquiry by U.S. EPA, Office of Regional Counsel, is required before a final determination on this request can be made. Therefore, this request is initially denied.

If you wish to appeal this initial denial, you may address such an appeal in writing to the Freedom of Information Officer, A-101, U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, D.C. 20460 within thirty (30) days of receipt of this negative determination.

The responsible official in this matter is Mr. James O. McDonald, Director, Enforcement Division, U.S. EPA, Region V.

Thank you for your interest in this matter.

Sincerely yours,

James O. McDonald for

George R. Alexander, Jr.
Regional Administrator

UCC
052004



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

230 SOUTH
CHICAGO

SEP 13 1977

Mr. J. F. Erdmann
Environmental Protection Coordinator
Union Carbide Corporation
Chemicals and Plastics
P. O. Box 471
Texas City, Texas 77590

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Thank you for your interest in this matter.

Sincerely yours,

George R. Alexander, Jr.
Regional Administrator

UCC
052005

8-25-77

DATE

Your request for information pursuant to the provisions of the Freedom of Information Act, as amended, was received on 8-25-77

The Agency has ten (10) working days to respond to your request. You can expect a reply shortly after expiration of the ten working day period. Further correspondence on this subject should cite the following Request Identification Number: RIN- 120-77

Freedom of Information Officer
U.S. Environmental Protection Agency

UCC
052006

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

Office of Public & Intergovernmental Affairs

U.S. Environmental Protection Agency

230 S. Dearborn Street

Chicago, Illinois 60604

OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE, \$300
AN EQUAL OPPORTUNITY EMPLOYER



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AUG 30 1977

J.F.E.

J.F. ERMANN

Environmental Protection Coordinator
Union Carbide Corporation
P.O. Box 471
Texas City, Texas 77590



UNION CARBIDE CORPORATION
CHEMICALS AND PLASTICS
P. O. BOX 171, TEXAS CITY, TEXAS 77590

August 22, 1977

Regional Administrator, Region V
U. S. Environmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604

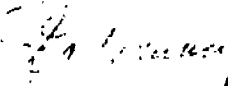
Dear Sir:

Under the provisions of the Freedom of Information Act, we are requesting a copy of the non-confidential information in your files pertaining to the vinyl chloride emission standard, 40 CFR, Subpart F, Section 61.60, et seq for the following company in your region. We are particularly interested in the Suspension PVC plants and the equivalency requests, waiver requests, compliance schedules, emission test data and Leak Detection and Elimination programs for this location.

Goodrich, Avon Lake, Ohio

Thank you very much for your consideration of this request.

Very truly yours,


J. F. Erdmann
Environmental Protection
Coordinator
(713) 945-7411, ext. 1126

JFE:ir
bcc: M. E. Eisenhour
R. L. Frantz
J. B. Leverton/R. E. O'Bryan/E. P. Files

UCC
052008



INTERNAL CORRESPONDENCE

E-VCM 111

UC 149-2

CHEMICALS AND PLASTICS

P. O. BOX 471, TEXAS CITY, TEXAS 77590

TO NAME Mr. D. R. Hutchinson
COMPANY Mr. J. B. Leverton
LOCATION TEXAS CITY PLANT

DATE September 9, 1977

COPY TO Mr. E. E. Ashworth/J. E. Dunker
Mr. J. H. Buehler
Mr. P. Delesandri/L. A. Ross
Mr. M. E. Eisenhour/R. L. Frantz
Mr. A. J. Giacchino/N. J. Alford
Mr. W. T. Gray, Jr./W. A. Mazzolini
Mr. D. R. Holcomb
Mr. J. S. Knight
Mr. J. S. Matlock/A. Baker
Mr. R. P. Melton

SUBJECT Operation of Ethyleneamines Process
With Reactor Blow-Off to No. 3 Ole-
fins Flare During Outage of VCM
Absorber System at Bldg. 174

Mr. W. P. Nickles
Mr. R. E. O'Bryan/E. P. Permit File
Mr. F. S. Provenzano
Mr. D. R. Reem

Gentlemen:

This is to indicate the appropriate mode of operation of the ethyleneamines process regarding disposition of the reactor blow-off under the present inoperability of the VCM absorber/recovery system at Bldg. 174 resulting from the recent autoclave explosion. Our operating permit with the TACB (#R-2897) requires that in any outage of the VCM absorber system, our first choice is to divert the stream to No. 3 Olefins flare, unless this causes an unsatisfactory haze and plume due to local ammonia connection. The permit requires we notify the TACB and local GCACD any time this diversion will extend over 24 hours. They have been so notified on Tuesday, September 6th that such a condition would exist until we could return the VCM absorber system to service and take the ethyleneamines stream back. There was no indication given to the agencies as to how long this might take.

Our second choice for this blow-off stream disposition is to return it to the fuel gas system at No. 1 Powerhouse, but I understand that this is not presently possible without some interim piping connections because of blast damage to pipelines at B. 119. It is in our best interests to maintain the blow-off to No. 3 Olefins flare until we can get the VCM absorber system back in service.

I hope this will explain our present position as required by our permit. If there are any questions, please call me.

Very truly yours,

Jack Erdmann
J. F. ERDMANN

JFE:ir

UCC
052009



INTERNAL CORRESPONDENCE

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SEP 9 1977

CHEMICALS AND PLASTICS

P. O. BOX 471, TEXAS CITY, TEXAS 77590

TO NAME, Mr. A. A. Peterson, III
COMPANY Mr. E. L. Agnew
LOCATION TEXAS CITY PLANT

DATE September 9, 1977

COPY TO

Mr. R. L. Frantz
✓ ~~Mr. J. B. Leverton/~~
~~Mr. J. F. Erdman~~
E. P. Files
Mr. R. P. Melton
Mr. H. P. Brady

SUBJECT

Vinyl Chloride Vent
Recovery System Outage

Gentlemen:

In order to properly fulfill our Texas Air Control Board (TACB) Operating Permit (No. R-2897) special provisions covering the Vinyl Chloride Vent Recovery System, I am requesting that Adolf Peterson furnish adequate written information regarding the anticipated length of outage and startup of the Vinyl Chloride Vent Recovery System, as well as any additional information which he deems pertinent.

In addition, I am requesting that Ed Agnew supply written information as well as verbal communication with regard to the length of time that the Ethyleneamines Reaction System Vent Stream is going to the No. 3 Olefins flare until such time that the Vinyl Chloride Vent Recovery System is abating this stream.

Please respond as quickly as possible. Thanks for your cooperation.

If you should require any additional information, please contact us.

Yours very truly,


R. E. O'Brien

REO:ec

UCC
052010

PRODUCTION

SCHEDULED DOWN

LESS THAN 90% OF PLAN

90% - 105% NORMAL CONTROL RANGE

GREATER THAN 105% PLAN

W/E 9/6
PLAN MPPD

Production Not Checked
Unavailable at this time

REMARKS

[illegible]

INDICATE DAILY ACTUAL BY X

- ① IPA to 9/3, T/A 9/4, A. Act. 9/5
② P/U IBA to 9/2 -- R₃, IBA 9/3
③ Prod. Mix T/A 9/2 ④ WDS start-up 9/3

OTHER REMARKS, CUSTOMER, VENDOR, CONCERNS, ETC.

119-174 - Units down @ 2:38 AM - Fire & Explosion on "C" autoclave.

11.3 - Lost 440V power & brine pumps - Went on emerg. cooling water.
@ 4:30 shut unit down. Ran out of brine - Ruptured line in Alder 119

111 - @ 2:40 CONCUSSION shut unit down - Action I shut down @ 7⁰⁰ am
Reaction is still on total recede.

115 - @ 2:40. Started Killing Autoclaves - All secured by 400m

114 - @ 2:40 shut down 520 extractor - Ruptured - 45:30 Col shut down.

117. Bldg secured by 5:15/Am. Unit down @ 2:50/Am - Secured by 5:45/Am

121. @ 2:45/pm Lost Sub Q, shutting down middle area - scanned @ 3³⁰/m

152 - #2 Line down @ 4⁴⁵ am - Gromet's out on shaker screen.

(Next page)
1 of 3

M. J. Asford
SIGNED SHIFT SUPERINTENDENT

NOTES: ONLY UNEXPECTED AND UNSCHEDULED UPSETS AND EVENTS ARE INCLUDED. REFER TO AREA NOTES FOR ADDITIONAL DETAILS. EXPLANATION REQUIRED FOR PRODUCTION VARIANCES BELOW 90% PLAN AND ABOVE 105% PLAN. INCLUDE ANY SPECIAL MACHINE OR EQUIPMENT FAILURE OR ABNORMAL ACTIVITY FOR FUNCTIONS NOT SHOWN UNDER "OTHER". ONLY MAJOR REACTION TYPE STREAMS ARE REPORTED. INCLUDE ANY DOWN STREAM PROCESSING OR REFINING SYSTEMS AS EXCEPTIONS.

UCC
052011

Bldg.

2 of 3

- 11 - Opened sub. Q2 @ 2⁴⁰ AM - opened sub Q3 @ 2⁴⁵ AM - opened Q1 @ 2⁴⁸ AM - Wiring arcing in unit. No problems with STM Load. Lost approx. 6 MW when vinyl area went down.
67. @ 3:15 Lost Mix water press. on evap. Routed to #1 cooling tower - suspected header damage from explosion. Found later that the header was OK. BACK in Service @ 6⁰⁰ AM
- 13CT. Low Tower level due to Low River water pressure (32[#]) - Opened F.W. MAKE-up to Tower @ 4¹⁵ AM - LAKE Lardie Fire pump on @ 4²⁰ AM. Level coming up @ SIC
- 165 - @ 3²⁰ AM Low pressure on 175[#] N₂ header - Header open ended in pipe rack (East of Bldg. 119) closed N₂ header in from AVE C to AVE D on 4th St. Press. up.
- E/S. Closed in center river water header @ 6:40 AM. Header had a bad leak East of Bldg 119 - Explosion damage. Had problems maintaining cooling tower levels through out plant. Shut c.w.a down @ #6 + 5 C.T. until levels were coming up. Ruptured c.w. line in Bldg 119 was losing lots of c.w.
- 224 - Shut 502 WHA down @ 3³⁰ AM - 501 WHB down @ 3⁴⁰ AM and furnaces cut to minimum - Water shortage. Furnace gas volume cut to 170 MPPD - @ 5:00 AM cut 9M[#] of C₄H₆ - High press. STM cut from 142M[#] to 40M[#]. All 600[#] STM off.
219. N₂ shut off of Unit tanks and stopped moving D/T to MAKE tank (using N₂ to pressure out) also all N₂ to field tanks. This was done in response to EARS alert - losing N₂ press.

57. @ 2⁴⁰/AM Oxo down - Mobil off @ 3³⁰/AM - #3 O/A having ³⁺³ water problems. Cut cities from 16 to 10 MBPD @ 3⁴⁵/AM
Back up to 13 MBPD @ 6¹⁰/AM.
92. @ 2:30/AM Emerg. Shutdown system tripped (Vibration)
Lost all 2300 v Motors. Cycle gas comp down - Motors
back on & unit stabilized @ 3¹⁵/AM
93. Furnace down @ 2³⁵/AM
47. stills down @ 2:45/AM - Lost cir. pumps on Tri-stills.
conduit tore loose during explosion.
24. Propionic acid system down @ 5⁴⁵
79. @ 3¹⁰/AM #2 Reactor & #1 still system down - Lost Syn.
gas from Bldg 138. @ 3¹⁵/AM #4 syn. gas comp. off & #3 on.
138. @ 2³⁵ #2 Reactor to vent - @ 2⁵⁵/AM shut down Del.
Comp @ Bldg 139 - @ 3¹⁰/AM found that #2 Reactor had
shut down completely - Vibration from explosion
had tripped the shutdown device. #2 Reactor on
and back in header to flare - Waiting on Oxo.
51. HEED down @ 5⁴⁵/AM - Decision made not
to receive Oxide during emerg.
- E/S. Closed stm. headers 600#, 200# & 70# - Condens.
sate, N2 Hdr. from AVE C to AVE D on 4th
street - Hdr's open ended - also damage to
pipe rack.

