

Conoco Chemicals
Continental Oil Company
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Aberdeen, Mississippi 39730

copy for
DEN
GLO
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KWC
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JFH

October 25, 1977

United States Environmental Protection Agency
Suite 300
1421 Peachtree Street
Atlanta, Georgia 30309

Attention: Mr. Thommie A. Gibbs, Chief
Air Engineering Branch

Dear Sir:

This letter is written to update your office of the progress of our plant in our effort of achieving compliance with the National Emission Standards for Hazardous Air Pollutants, Standard for Vinyl Chloride (40 CFR, Chapter I, Subchapter C, Part 61, pages 46560-46573).

Region IV of the Environmental Protection Agency granted our plant a waiver on March 30, 1977 (Mr. Jack E. Ravan to Mr. G. G. Draper, letter dated March 30, 1977). The letter granting the waiver listed specific dates by which the Plant was to achieve compliance with the various parts of the Emission Standard. Described below are each of the various areas as listed in Mr. Ravan's letter.

I. § 61.64 (a) (1) - Reactor Exhaust Gases

	<u>Module No. 2</u>
i) Purchase Order Issued	4/30/77
ii) On Site Construction Started	5/31/77
iii) On Site Installation Completed	11/30/77
iv) Final Compliance Achieved	12/31/77

As stated in our submitted plan of December 20, 1976, Module No. 1 is in compliance in this area. Module No. 2 will not operate until a similar containment system is in place.

The purchase orders (i) have been issued and on site construction (ii) has started as required. We now project installation completion for January 20, 1978. This does not, however, imply any violation of emission standards or of our waiver as [REDACTED]

II. § 61.64 (a) (2) - Reactor Opening Loss

	<u>Module No. 1</u>	<u>Module No. 2</u>
i) Purchase Order Issued	3/31/77	4/30/77
ii) On Site Construction Started	4/30/77	5/31/77
iii) On Site Installation Completed	7/31/77	11/30/77
iv) Final Compliance Achieved	8/31/77	12/31/77

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As indicated in our December 20, 1976 waiver request and compliance plan submittal, the achievement of compliance with reactor opening loss emissions is dependent upon the final temperature and pressure conditions within the reactor.

Regarding Module No. 2, we do not intend to operate this section until compliance facilities exist. As indicated under Section I, we expect to initiate Module No. 2 operation on about January 20, 1978.

Engineering personnel are now monitoring operating conditions on Module No. 1. Accurate operating condition data is being obtained. This data is now being used to calculate reactor opening loss emissions.

III. § 61.64 (e) - Emissions From Mixing, Weighing and Holding Containers

- | | | |
|------|--------------------------------|---------|
| i) | Purchase Order Issued | 6/1/77 |
| ii) | On Site Construction Started | 10/1/77 |
| iii) | On Site Installation Completed | 12/1/77 |
| iv) | Final Compliance Achieved | 2/1/78 |

Purchase orders (i) for the required equipment have been issued. Field construction (ii) was begun during July, well ahead of schedule. The completion of installation (iii) and the achievement of compliance (iv) remain on schedule as indicated by the above dates.

IV. § 61.64 (e) - Sources Following the Strippers

- | | <u>Module No. 1</u> | <u>Module No. 2</u> |
|------|--------------------------------|---------------------|
| i) | Purchase Order Issued | Completed |
| ii) | On Site Construction Started | Completed |
| iii) | On Site Installation Completed | Completed |
| iv) | Final Compliance Achieved | Completed |

Module No. 2 will not operate until the system for achieving compliance is in place. Projected initial operation for the Module No. 2 system is January 20, 1978.

Regarding Module No. 1, we are now stripping each reactor batch. Samples of each batch are being obtained and are being analyzed.

V. § 61.65 (b) (1) - Loading and Unloading Lines

- | | | |
|------|--------------------------------|---------|
| i) | Purchase Order Issued | 6/1/77 |
| ii) | On Site Construction Started | 11/1/77 |
| iii) | On Site Installation Completed | 2/28/78 |
| iv) | Final Compliance Achieved | 4/1/78 |

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Purchase orders (i) for the required equipment have been issued. Field construction (ii) was begun October 1, 1977, ahead of schedule. Construction completion (iii) and the achievement of compliance (iv) remain on schedule.

VI. § 61.65 (b) (3) (i) - Rotating Pump Seals

	<u>Module No. 1</u>	<u>Module No. 2</u>
i) Purchase Order Issued	Completed	5/31/77
ii) On Site Construction Started	Completed	10/31/77
iii) On Site Installation Completed	Completed	11/30/77
iv) Final Compliance Achieved	10/31/77	1/1/78

Module No. 2 will not operate until all rotating pumps in vinyl chloride service contain double mechanical seals. We do not project to operate any equipment in Module No. 2 until about January 20, 1978.

All rotating pumps in vinyl chloride service in Module No. 1 have been equipped with double mechanical seals with one exception. We expect all pumps to be in compliance on October 31, 1977.

VII. § 61.65 (iv) - Reciprocating Compressors

i) Purchase Order Issued	9/1/77
ii) On Site Construction Started	11/1/77
iii) On Site Installation Completed	3/1/78
iv) Final Compliance Achieved	5/1/78

The purchase orders (i) for materials to install double mechanical seals on the plant's reciprocating compressors have been ordered. Construction (ii) was initiated on October 1, 1977, ahead of schedule. The remaining dates for installation completion (iii) and achievement of compliance (iv) are on schedule.

VIII. § 61.65 (b) (3) (v) - Agitator Seals

	<u>Module No. 1</u>	<u>Module No. 2</u>
i) Purchase Order Issued	Complete	4/30/77
ii) On Site Construction Started	Complete	5/31/77
iii) On Site Installation Completed	Complete	10/31/77
iv) Final Compliance Achieved	Complete	11/30/77

The agitators on the Module No. 1 reactors contain double mechanical seals and are in compliance.

The four reactors in Module No. 2 will remain inoperable until new agitators, equipped with double mechanical seals, are installed.

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IX. § 61.65 (b) (4) - Relief Valve Leakage

	A	B
i) Purchase Order Issued	6/30/77	4/31/77
ii) On Site Construction Started	8/31/77	5/31/77
iii) On Site Installation Completed	10/31/77	11/30/77
iv) Final Compliance Achieved	11/30/77	12/31/77

A = Unloading Area Equipment and Module No. 1. Equipment

B = Module No. 2 Equipment and Reactors

The equipment in Module No. 2 (B) will not operate until the required compliance items are installed.

Purchase orders (i) and the start of construction (ii) for the items under A were completed as per the required dates. The remaining work for the items in A are on schedule.

X. § 61.65 (b) (6) - Opening of Equipment

i) Purchase Order Issued	5/31/77
ii) On Site Construction Started	8/31/77
iii) On Site Installation Completed	11/30/77
iv) Final Compliance Achieved	2/1/78

Purchase orders (i) have been issued and on site construction (ii) has been initiated. The completion of construction (iii) and the achievement of final compliance (iv) remain on schedule to meet the dates specified.

XI. § 61.65 (b) (7) - Samples

	Module No. 1	Module No. 2
i) Purchase Order Issued	Complete	4/1/77
ii) On Site Construction Started	Complete	5/1/77
iii) On Site Installation Completed	4/30/77	12/1/77
iv) Final Compliance Achieved	5/31/77	1/1/78

The plant will not take any samples and will thus avoid emissions in Module No. 2 until the required sampling system is installed.

The sampling systems in Module No. 1 are installed and operable.

XII. § 61.65 (b) (9) - In Process Waste Water Stripping

	Module No. 1	Module No. 2
i) Purchase Order Issued	Complete	4/1/77
ii) On Site Construction Started	Complete	5/1/77
iii) On Site Installation Completed	Complete	12/1/77
iv) Final Compliance Achieved	5/1/77	2/1/78

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The various process water streams will be collected and batch stripping to the required 10 ppm level. [REDACTED] the [REDACTED] discussed in Section XIII. The equipment for Module No. 1 is installed and is in operation. The Module No. 2 equipment is now being installed. The plant will not operate Module No. 2 until the required compliance equipment is operable.

XIII. § 61.65 (b) - Vent Gas Emission Recovery System

- | | | |
|------|--------------------------------|---------|
| i) | Purchase Order Issued | 8/1/77 |
| ii) | On Site Construction Started | 10/1/77 |
| iii) | On Site Installation Completed | 1/1/78 |
| iv) | Final Compliance Achieved | 2/1/78 |

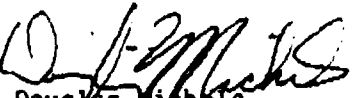
Purchase orders (i) have been issued and on site construction (ii) has been started. Completion of installation (iii) and the achievement of compliance (iv) remain on schedule.

XIV. § 61.64 and 61.65 - Vent Gas Incineration

- | | | |
|------|--------------------------------|---------|
| i) | Purchase Order Issued | 9/1/77 |
| ii) | On Site Construction Started | 4/1/78 |
| iii) | On Site Installation Completed | 5/15/78 |
| iv) | Final Compliance Achieved | 8/1/78 |

The purchase order (i) for the incinerator was issued on June 14, 1977, far ahead of schedule. The incinerator vendor, Trane Thermal, Inc., has not yet finalized the delivery date to the Plant. We remain hopeful of meeting the other dates of the incinerator schedule. This is, however, somewhat dependent upon the equipment delivery date from Trane. We have tried to expedite delivery from Trane but we can not completely control their eventual delivery date.

We hope the above information clarifies our current status on our compliance plan. If there are any questions concerning this information or if further clarifications are needed, please contact me at A.C. 601-369-8111, ext. 239.


Douglas Michels
Chief Process Engineer
Aberdeen PVC Plant

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