



Interoffice Communication

To : R. D. Gamblin
From : John Friend
Date : June 17, 1982
Subject : EMISSION RECOVERY SYSTEM REVISIONS

How much?

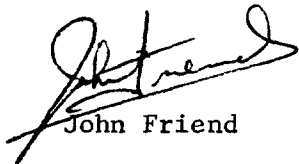
The VCM emission recovery system in Aberdeen was installed in the early days of VCM regulations promulgation. The installation included two old compressors and two old vacuum pumps from a small reactor module which were utilized to recover selected VCM emissions. The compressors and vacuum pumps did not match since one compressor could handle the design vapor flow from two vacuum pumps. The system was supposed to provide a continuous vacuum source for containing certain emissions including those from clearing equipment and VCM unloading hoses. As I understand it, the system never functioned satisfactorily. To complicate the situation, the batch water strippers installed in 1981 were tied into this emissions recovery system. This has completely overloaded the system to the point that it rarely operates under vacuum. In fact, the large reactor recovery systems are usually used for water stripping and other emissions recovery because the emissions recovery system cannot maintain a low enough pressure on its suction side. This causes reactor downtime waiting on recovery which has become a significant problem since start-up of the expansion.

When I first arrived here, I started asking questions about the emission recovery system and its obvious poor performance. I was told that it never has worked properly and that it has gotten worse since the batch water strippers were tied into it. It normally operates under pressure instead of vacuum. We had maintenance perform a great deal of work on the system including rebuilding the compressors and vacuum pumps. This did not solve the problem. We then had a Nash technical service representative come to the plant to work on the system. His analysis indicated that the equipment was undersized for the process requirements, which was our conclusion also. Therefore, our process engineering group designed revisions to the emission recovery system which include installation of larger, matched compressors and vacuum pumps as well as upgrading the instrumentation as recommended by the Nash man. A definitive estimate for this project is \$323,000.

The AFE for the batch water strippers is for \$810,000. That project is basically complete and expenditures total only about \$440,000. Since the batch water strippers have overloaded the emission recovery system such that stripping must be performed with the reactor recovery system, I am asking your approval to proceed with the emission recovery revisions under the batch water stripper AFE. I believe that this expenditure belongs under the batch water stripper AFE because the batch water strippers cannot operate as intended without these revisions. I strongly believe that this project must move forward in order to remove a significant reactor recovery system availability problem and to substantially improve our EPA compliance systems. Our capital expenditures forecast

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includes spending the entire \$810,000 on the batch water stripper AFE. In addition to the \$440,000 spent prior to this year, the forecast includes about \$115,000 in late 1982 and about \$235,000 in 1983 for the emission recovery system revisions.



John Friend

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