

UNION
CARBIDE

INTERNAL CORRESPONDENCE

HEALTH, SAFETY & ENVIRONMENTAL AFFAIRS

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

October 24, 1984

To: S. M. Norwood
G. F. Tacquard
TEXAS CITY PLANT

Copy to: R. M. Arnold
S. A. Dickerson
T. T. Do-Hoang
M. E. Eisenhour
D. R. Hall
J. B. Leverton/S. J. Footer
R. A. Mendez
NESHAPS (VCM) File
W. P. Nickles
R. C. Wise/O. H. Cunningham - 500

Subject: TACB Approval of Request for Change in Compliance
Sampling for Vinyl Chloride Monomer in Stripped
Varnish, Solution Vinyl Resins Unit, Texas City

Gentlemen:

Attached is the long-awaited approval for our request for change in the compliance method for residual vinyl chloride monomer in the stripped varnish for this process. As many of you know, this approval culminates a long and complex series of events which finally provided the control of the process which in turn gave us the data and confidence to support the request. The net result is that we will no longer be required to sample and analyze the stripped varnish samples and report the daily weighted average vinyl chloride concentration (A_{ti}) to comply with the regulation. We will now provide a daily average L/V ratio from the process operating logs, which will eliminate the need for the laboratory work. I suggest we try to start the new reporting method as of Nov. 1, 1984.

My thanks and appreciation to the unit staff members who contributed to the efforts that we made in securing this change and to the patience and confidence in all who believed we had a chance to make it work.

If there are any questions, please call me.

Very truly yours,


J. F. Erdmann

JFE:IR:TVCMSVR3
Attachment

UCC
050810

TEXAS AIR CONTROL BOARD

6330 HWY. 290 EAST
AUSTIN, TEXAS 78723
512/451-5711

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R. HAL MOORMAN
HUBERT OXFORD, III

October 19, 1984

J.F.E.
OCT 23 1984

Mr. J. F. Erdmann, P.E.
Environmental Protection Coordinator
UNION CARBIDE CORPORATION
Post Office Box 471
Texas City, Texas 77590

Re: Request for Change in Compliance
Sampling for Vinyl Chloride
Monomer

Dear Mr. Erdmann:

This is in response to your letter dated May 25, 1984 and the supporting letter dated July 23, 1984 requesting approval for a change in the compliance sampling method for vinyl chloride monomer (VCM) from your VCM strippers. The compliance sampling method in question is contained in the National Emissions Standards for Hazardous Air Pollutants for vinyl chloride at 40 CFR 61, Subpart F. You proposed that operating parameters, specifically a liquid to solvent vapor (L/V) ratio of less than 2.5, should define normal operation and assure that the stripping stills are complying with the standard of 400 parts per million (ppm) or less of residual VCM. A review of your test records from 1978 to present supports your application. Except for the excursions noted and explained in your letter of July 23, 1984, the plant has an operating history of 10 ppm as compared to the allowable of 400 ppm.

Your proposal to report the L/V ratio in lieu of the presently required test schedule is hereby approved. The L/V ratio limitation will be used in addition to the 400 ppm concentration limit in compliance determinations.



Celebrating 150 Years of Texas Independence 1836 - 1986

UCC
050811

Mr. J. F. Erdmann

-2-

October 19, 1984

If you have any questions, please contact Mr. Clayton Smith of my staff.

Sincerely,

Eh. Bell

AB
Bill Stewart, P.E.
Executive Director

cc: Mr. Herbert W. Williams, Jr., Regional Director,
Houston
Mr. Martin Brittain, Air & Waste Management Division,
Environmental Protection Agency, Region 6, Dallas

UCC
050812

Copy

TO: JOAN LEVERTON

9-21-84

CC: SAM NORWID
GEORGE TACQUARD
MERLE EISENHOUR
MARIANO RAMOS

SUBJECT: OUR REQUEST TO
TACB FOR ELIMINATION OF
VCM STRIPPED TARNISH TESTING
AND USE OF PARAMETER MONITORING
AND REPORTING. - SVR UNIT.

JOHN:

In checking w/ TACB Compliance Div. yesterday, I was
told that this request had received favorable reviews and
that approval was recommended. The paperwork is going thru
the standard bureaucratic "sign-off" procedure at AUSTIN -
(IT HAS PASSED THRU THE LOCAL + REGIONAL OFFICES WITH POSITIVE
RECOMMENDATIONS, I UNDERSTAND).

IT SHOULD BE ISSUED IN 2-3 WEEKS - WHICH
WILL PROBABLY BE WHILE I'M ON VACATION (SEP 27-OCT 4).
I WILL ASK MARIANO TO SCREEN MY MAIL WHILE I'M GONE
& BRING IT TO YOUR ATTENTION IF IT SHOULD COME DURING
THAT TIME - THEN YOU CAN SEE THAT THE NECESSARY
DISTRIBUTION CAN BE MADE.

THANKS



UCC
050813



INTERNAL CORRESPONDENCE

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

To: M. E. Eisenhour
J. B. Leverton
S. M. Norwood

May 9, 1983

Subject: NESHAPS VCM Regulation, Stripping Tests to Provide Parameter Controls in Lieu of Analytical Testing for VCM Content

Gentlemen:

In trying to get approval from EPA to eliminate the present varnish sampling and VCM testing procedures for stripped SVR varnish, I have contacted the proper people* at TACB/Austin and EPA/Dallas to be sure we know how to proceed. The regulation has not changed and the alternative of showing stripping parameter data that will assure proper VCM stripping is still acceptable, according to Martin Brittain of EPA/Dallas. The TACB cannot approve this change for us, but EPA wants their comments as before to indicate their acceptance of the proposal. We can submit a proposal simultaneously to both agencies to save some review time.

The present plan, which Merle and I have discussed briefly, would be to set up a test run on one stripping system to vary the base temperature over a wide enough range to show an increase in VCM in the varnish. We should consider a range of varnish flow rates, acetone vapor flows, and system pressures so that we can specify that under a given range of conditions with base temperature at some measured value, we would have a particular VCM level in the stripped varnish. We can then provide daily data showing the operating ranges to determine a VCM level and use it for reporting, without going thru varnish sampling and analysis.

Merle and I will proceed with this program at the convenience of the production unit schedules. Any comments or suggestions are welcome.

Yours very truly,

Jack
J. F. Erdmann

JFE:ir

* TACB/Austin, Compliance Div., Cecil Bradford/Herb Williams
EPA/Dallas, Air and Waste Management Div., Allyn Daws/Martin Brittain

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050814

UNION
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INTERNAL CORRESPONDENCE

UC 149-2

TO: ~~Mr. A. Bjorkeri~~

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

cc: ~~Mr. M. Arnold~~
② M. E. Eisenhower ✓
J. A. Gordy
F. L. Johnson
③ H. R. Moore
S. M. Norwood
USV Bldg. 117 Chiefs

Date: May 2, 1983

Subject: Bldg. 117 Stripping Still
Base Resample

Ben,

The current practice is to recheck the residual VCM in the stripper base sample whenever the result exceeds 200 ppm. In order to make this data more meaningful, we request a stripper base resample to be analyzed instead of having the same sample rechecked. For the EPA record we will report the analysis of the resample.

Please advise Bldg. 117 Chiefs (Exts. 5524 or 4308) when the residual VCM exceeds 200 ppm and a stripper base resample is required.

Thank you very much for your help.

Sincerely,

Thuy T. Do

① Thuy T. Do I agree, Mark.

*Why not report both analyses then we
can't be accused of tinkering with the
data. OK?*

TTD/st

5/5/83

*If we have a sampling problem, I
would suggest that "we" (Dennis, Thuy & Harry) determine
how to obtain more representative samples
so that we minimize resamples - just adds to
costs of this activity! Ben - Please communicate
above SOP change to QC personnel. Bob.*

Mark E.

UCC
050815
RECEIVED

MAY 3 1983

M. E. EISENHOWER