



Interoffice Communication

To J. C. Ledvina - Houston
From J. A. DeBernardi
Date August 7, 1981
Subject Letter to EPA on Fugitive Emissions
NSPS Non-Applicability to LCVCM Expansion

With reference to your letter of July 27 on the subject, the items you asked be checked have been checked with the following results:

- 1) As we understand it, if the retro-fit part of the law is promulgated we have no choice in complying or not. Therefore, the answer must be yes all VOC equipment must have double mechanical seals and vents.
- 2) Tests run on the incinerator vent by Kemron indicate the incinerator is 99.9% efficient in destroying VOC's. The expansion will put additional load on the system, however our best engineering judgement is that the units will remain 99.9% efficient with the additional load.
- 3) The overall accuracy of the work done related to valve count is not exact. No attempt was made to segregate liquid service from vapor service. We cannot defend all valves being in liquid service. It will be sometime before the new plant iso's will be available to get a more accurate count of valves and service. If this assurance is needed before the letter is submitted, I would speculate we're looking at sometime in the second quarter of 1982.
- 4) The number of compressors shown in Table I and II is correct.

I have no significant comments on the letter. As we discussed by phone on August 6, the last sentence in the first paragraph on page 2 needs revision. As I also mentioned this entire matter and strategy needs to be discussed with R. D. Gamblin and a determination made of where and if funds need to be budgeted in 1982 for retrofit of existing plant equipment.

J. A. DeBernardi
Plant Manager

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CC:
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