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Air Quality Control Region 7
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J.F.E.
AUG 24 1984

August 21, 1984

Mr. J. F. Erdmann, P.E.
Environmental Protection Coordinator
Union Carbide Corporation
Post Office Box 471
Texas City, Texas 77590

Re: Vinyl Chloride Monomer (VCM)
Emissions Control System
Account No. GB-0076-J

Dear Mr. Erdmann:

This letter is to confirm the telephone conversation between you and Ms. Victoria Wang of my staff on August 3, 1984. We understand that vented vapors from reactors, strippers, and vinyl chloride tanks are fed to an absorber/scrubber. The exhaust gas from the absorber/scrubber is then vented to the atmosphere through a flare.

National Emission Standards for Hazardous Air Pollutants (NESHAP), paragraphs 40 CFR 61.64(a)(1), (b), (c), and (d) require that the concentration of VCM in the exhaust gases discharged to the atmosphere from specific pieces of equipment be limited to 10 ppm. In order to determine compliance with the aforementioned regulations, please provide us with data on the VCM concentration in the exhaust gas from the flare, or the VCM concentration in the exhaust gas from the absorber/scrubber.



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Mr. J. F. Erdmann

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and flare engineering or testing data. Completed tables for flare systems and absorbers (copies enclosed) would suffice as the control equipment engineering data. You may include any other supporting documents which would demonstrate the VCM emissions from the flare to be in compliance with the NESHAP standard. Please submit such information within thirty days of receipt of this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact us.

Sincerely,

Bill Smalling

Bill Smalling, Chief
Technical Section

Enclosures

cc: Mr. Sabino Gomez, M.P.H., Acting Director, Compliance Division,
Austin
Dr. E. R. Ibert, Director, Environmental Control Services, Galveston
County Health District, La Marque

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