

CHEMICALS



INTEROFFICE / LAKE CHARLES

TO VCM-II Personnel

DATE September 16, 1982

FROM Ben Reynolds

SUBJECT VCM Releases

The following is taken from a letter received by PPG Environmental Department on June 18 requesting more information on the 30 VCM SRV releases we have reported to EPA since January 19, 1977:

"Unless a relief discharge of vinyl chloride can be established as an emergency discharge that could not have been avoided by taking preventive measures, it is considered a violation of the National Emission Standard for vinyl chloride found at 40 CFR, §61.65(a) of the National Emission Standards for Hazardous Air Pollutants (NESHAP). Each discharge which constitutes a violation is subject to enforcement sanctions under Section 113 of the Clean Air Act, as amended (hereafter called 'the Act')."

We have just completed the reply to this letter and it is being sent to EPA's Regional Office in Dallas. We do not know what the "enforcement sanctions" will entail, but it could be a fine, possibly a substantial fine. We cannot change what has occurred in the past, but must direct our efforts toward having no more preventable VCM SRV releases. Equipment failures/malfunctions will happen and we will work to minimize these. Engineering is studying alternatives for better ways to protect the transfer lines. In the meantime, we must do a very thorough job of watching all areas of our operation which have shown potential for VCM SRV releases, such as: improper valve alignment for sampling/transferring bullets and day tanks; failure to float lines after transfers; blocking off of equalizing lines; failure to watch sphere pressures during transfers, etc. Disciplinary action will be taken in the future if releases occur as a result of operator error.

Please let us know if you have ideas which may lead to solutions to this problem or if you've seen any potential problem areas which we need to address.

bjm

Charles,
Ben

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