



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

65 DEC 1984

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Mr. K. S. Komoroski
P. P. Industries
Post Office Box 1000
Lake Charles, LA 70602

Dear Mr. Komoroski:

This letter is to confirm our November 29th telephone conversation that a meeting has been scheduled for December 11th at 8:30 A.M. in Durham between representatives of the U.S. Environmental Protection Agency (EPA), Radian Corporation, and your company. As we discussed, the purpose of the meeting is to gather information that will improve our understanding of the need for adding a control device bypass provision to the vinyl chloride (VC) emission standard. A second purpose is to identify additional data required for any further investigation of an appropriate bypass provision.

Specifically, we are seeking information from your company about the following:

1. The general design and operating parameters of the control device(s) used at your EDC/VCM facilities to control exhaust gases subject to the VC standard. For incinerator controls, general design and operating parameters of interest include operating temperature range, design capacity, maximum capacity and turndown capabilities. Also of interest is the usual state of the backup control device (cold, warm, or hot) and the time required to switch to the backup device.
2. The types of process upsets (or other conditions) that could lead to the bypass of incinerator systems and how such conditions might be avoided.
3. The types of incinerator malfunction that could lead to the bypass of the incinerator system and how such malfunctions might be avoided.
4. The method used to estimate the amount of VC in the bypassed exhaust gas streams.
5. Any method used to monitor the VC content of the incinerator discharge or bypass.

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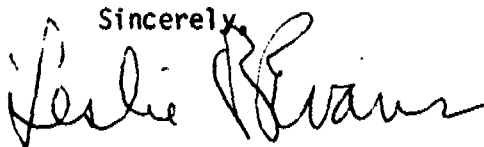
6. For EDC/VC facilities, the portion of exhaust gas that comes from the EDC/VC purification vents and the oxychlorination reactor vent and the impact of the oxychlorination vent fluctuation on control device bypass frequency and duration.

7. A brief description (reason and amount) of any VC emissions caused by plant start-up or shutdown.

8. An "Incineration Bypass History" similar to that presented at our October 30, 1984 meeting but with reasons for bypasses (if possible).

If you have any questions about these discussion items, please call me at (919) 541-5671. We appreciate your continued cooperation in our review of the VC standard and look forward to meeting with you.

Sincerely,



Leslie B. Evans
Chemicals Manufacturing Section
Chemicals and Petroleum Branch