

PPG
CHEMICALS

Had I file this for future reference, we should be doing what it says for T-E F. C.M.
INTEROFFICE LAKE CHARLES

TO J. E. Wyche

DATE May 28, 1980

FROM A. P. Plauche *AP*

SUBJECT In-Plant Vinyl Chloride Emissions Survey

On May 5-8, 1980, C. A. Burns and I visited the VCM Unit, the Tri-Ethan II Unit, and the Plant B Shipping Department to survey PPG's readiness (with regard to VC emissions) for an upcoming EPA inspection. The overall picture looked good, except for monitoring in the Shipping Department. Attached is a summary of the conditions found to exist in these areas and the improvements needed to bring us into compliance.

/ap

Attachment

cc: W. Caillouet

R. Holliday

G. Jordan

J. LaFleur/H. Hank

C. Muery

W. Peard/C. Burns

SL 043971

Regulation	VCM (Bill Sonnier)	Tri-Ethane II (Clark Graybill)	Plant B Shipping (Winston Calhouet)
61.65 (a) Relief valve discharge	None in the past six months - they would be reported to Env. Dept. if occurs - in full compliance; no further action needed.	Same as VCM	Same as VCM
61.65 (b) Fugitive emission sources 1-Loading & unloading lines	N/A	N/A	All gas resulting from the cleaning of lines is sent to the incinerators. The concentration is not checked by the Lab. It is determined by "experience" as to how long a line should be cleared. This line is plugged when cleaning is completed. If the incinerator were to "shut down", loading/unloading operations would halt. This is not presently in SOP. The volume of the vinyl remaining in the line (after cleaning) should be determined by Lab analyses and documented. Analyses of 3 or 4 cleared lines should give us a good basis to determine how many times a line should be purged to the incinerator. Analysis should be performed each quarter to assure ourselves and EPA that this procedure is still accomplishing its purpose. This procedure, along with shutdown procedures, should be included in SOP.
2-Slip gauges	N/A	N/A	Discharge sent to incinerator. This is in SOP. In full compliance; no further action needed.
3-Leakage from pumps, com- pressors, & agitators	pumps - double mechanical seals (leak returned to process) compressors - none in VC service agitators - double mechanical seals (leak returned to process) In full compliance; no further action needed.	Same as VCM	Pumps - double mechanical seals Compressors - none in VC service Agitators - none in VC service Same as VCM
4-Leakage from relief valves	There is a rupture disc between VC equipment and relief valves. In full compliance; no further action needed.	Same as VCM	The only relief valves in the area are on the tank cars. This would be covered by DOT, not EPA (no rupture discs). Same as VCM

SL 043972

<u>Regulation</u>	<u>VCM</u>	<u>Tri-Ethane II</u>	<u>Plant B Shipping</u>
5-Manual venting of gases	All gases manually vented are sent to the incinerator. In SOP. In full compliance; no further action needed.	Same as VCM	Same as VCM
6-Opening of equipment	All vinyl removed from equipment is sent to the incinerator. The Lab (M. Wood) samples gases from the equipment until the concentration is below 2%. Some of these reports are kept in the unit. The Lab retains files of all of these reports. SOP. <u>A copy of all lab analyses reports should be kept in the individual units. Otherwise, no further action needed.</u>	Same as VCM	Same as VCM
7-Samples	All samples are purged in a closed process system and returned to process. SOP. In full compliance; no further action needed.	Same as VCM	N/A
8-Leak detection:	There are 9 permanent sample points in the area. Samples are taken continuously and in sequence with analysis showing on a computer print-out in the control room. All sample points are in operation and checked at least three times per week. The calibration gas cylinders are properly labeled. SOP. The action taken to correct a detected leak should be noted on the computer print-out.	Same as VCM except: (a) 11 sample points (b) action taken is written on print-out In full compliance; no further action needed.	There is no permanent sampling instrumentation in this area. Permanent sampling instrumentation should be installed ASAP and the schedule for maintenance on the instrumentation properly labeled calibration gas mixture, a plan of action to correct leaks when detected, and the definition of a leak be followed.
(i) permanent monitor			
(ii) portable detector	A portable detector is shared with the Shipping Dept. Patrols are made weekly with monthly checks being more point specific. The instrument is calibrated and maintained as needed (almost every time it is used - unreliable). The "time" of the patrol was not being recorded, but will be in the future. A monitor should be purchased so that VCM would then have its own instrument. This would enable personnel to make the patrols on a more routine basis. Also, the presently used monitor could be used as a backup. The time of the patrols should be noted on the report.	Patrols are made ^{WEEKLY} twice/month. The "action taken" and "time" will be recorded in the future (not being done in the past). The portable monitor is calibrated and checked on request.	No patrols were made since July 30, 1979 due to unreliability of portable monitor shared with VCM. A monitor should be purchased to enable personnel to make "routine" patrols in the area.

SL 043973

(iii) semi-portable HNU	N/A	N/A	Used for ship loading but not for barges. This monitor should be used for barge loading as well as ship loading.
9-Inprocess waste water	If under 10 ppm, sent to segregated sewer and then to API. If over 10 ppm, kept until a level under 10 ppm is reached (under N ₂ purge to incinerator). In full compliance; no further action needed.	None in VC service	N/A

The integrity of the sample lines in Tri-Ethane II and VCM are checked twice per year using a standard VC sample which is introduced into each sample line.

Included in SOP are the procedures to be followed in the event that the incinerator could be shut down which would prevent any vent gas burning.

SL 043974