

TO: J. W. Kachtick

DATE: March 5, 1985

FROM: T. T. Moore

RE: NESHAPS - VCM Semi-Annual Report  
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The data required for submittal in NESHAPS - VCM Semi-annual report are attached. The time period covered is from September 1, 1984 to February 28, 1985.

Table 1 - Incinerator emission over 10 ppm -41-CFR-61.70 (c) (1)

Table 2 - Residual VCM weighted averages - 41-CFR-61.70 (c) (2)

Table 3 - Reactor opening emissions - 41-CFR-61.70 (c) (3)

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T. T. Moore

TTM/vm

TABLE 1

INCINERATOR EMISSION OVER 10 PPM (1 hr. Avg.)

PER 41-CFR-61.70 (c) (1)

DATE

TIME

NONE

TABLE 2  
RESIDUAL VCM WEIGHTED AVERAGES  
PER 41-CFR-61.70 (c) (2)

| DATE     | RESIDUAL VCM, PPM | DATE     | RESIDUAL VCM, PPM |
|----------|-------------------|----------|-------------------|
| 09-01-84 | 65                | 10-17-84 | 6                 |
| 09-02-84 | 64                | 10-18-84 | 10                |
| 09-03-84 | 29                | 10-19-84 | 18                |
| 09-04-84 | 19                | 10-20-84 | 8                 |
| 09-05-84 | 77                | 10-21-84 | 11                |
| 09-06-84 | 44                | 10-22-84 | 32                |
| 09-07-84 | 42                | 10-23-84 | 48                |
| 09-08-84 | 78                | 10-24-84 | 38                |
| 09-09-84 | 42                | 10-25-84 | 35                |
| 09-10-84 | 34                | 10-26-84 | 28                |
| 09-11-84 | 26                | 10-27-84 | 18                |
| 09-12-84 | 35                | 10-28-84 | 15                |
| 09-13-84 | 39                | 10-29-84 | 7                 |
| 09-14-84 | 31                | 10-30-84 | 38                |
| 09-15-84 | 58                | 10-31-84 | 38                |
| 09-16-84 | 44                | 11-01-84 | 27                |
| 09-17-84 | 54                | 11-02-84 | 20                |
| 09-18-84 | 24                | 11-03-84 | 40                |
| 09-19-84 | 20                | 11-04-84 | 25                |
| 09-20-84 | 24                | 11-05-84 | 22                |
| 09-21-84 | 22                | 11-06-84 | 18                |
| 09-22-84 | 27                | 11-07-84 | 19                |
| 09-23-84 | 59                | 11-08-84 | 17                |
| 09-24-84 | 18                | 11-09-84 | INSTRUMENT O/S    |
| 09-25-84 | 18                | 11-10-84 | 18                |
| 09-26-84 | 20                | 11-11-84 | 82                |
| 09-27-84 | 28                | 11-12-84 | 35                |
| 09-28-84 | 33                | 11-13-84 | 40                |
| 09-29-84 | 64                | 11-14-84 | 23                |
| 09-30-84 | 35                | 11-15-84 | 27                |
| 10-01-84 | 32                | 11-16-84 | 34                |
| 10-02-84 | 46                | 11-17-84 | 23                |
| 10-03-84 | 17                | 11-18-84 | 32                |
| 10-04-84 | 98                | 11-19-84 | 37                |
| 10-05-84 | 31                | 11-20-84 | 98                |
| 10-06-84 | 23                | 11-21-84 | 40                |
| 10-07-84 | 72                | 11-22-84 | 45                |
| 10-08-84 | 38                | 11-23-84 | 14                |
| 10-09-84 | 22                | 11-24-84 | 38                |
| 10-10-84 | 30                | 11-25-84 | 27                |
| 10-11-84 | 37                | 11-26-84 | 18                |
| 10-12-84 | 44                | 11-27-84 | 36                |
| 10-13-84 | 28                | 11-28-84 | 8                 |
| 10-14-84 | 42                | 11-29-84 | 21                |
| 10-15-84 | 21                | 11-30-84 | 37                |
| 10-16-84 | 246               | 12-01-84 | 36                |

TABLE 2 (cont'd)  
RESIDUAL VCM WEIGHTED AVERAGES  
PER 41-CFR-61.70 (c) (2)

| DATE     | RESIDUAL VCM, FPM | DATE     | RESIDUAL VCM, FPM |
|----------|-------------------|----------|-------------------|
| 12-02-84 | 18                | 01-17-85 | 30                |
| 12-03-84 | 66                | 01-18-85 | 43                |
| 12-04-84 | 22                | 01-19-85 | 42                |
| 12-05-84 | 19                | 01-20-85 | 19                |
| 12-06-84 | 14                | 01-21-85 | 33                |
| 12-07-84 | 35                | 01-22-85 | 35                |
| 12-08-84 | 16                | 01-23-85 | 48                |
| 12-09-84 | 114               | 01-24-85 | 116               |
| 12-10-84 | 46                | 01-25-85 | 44                |
| 12-11-84 | 10                | 01-26-85 | 41                |
| 12-12-84 | 11                | 01-27-85 | 19                |
| 12-13-84 | 16                | 01-28-85 | 17                |
| 12-14-84 | 17                | 01-29-85 | 19                |
| 12-15-84 | 25                | 01-30-85 | 19                |
| 12-16-84 | 30                | 01-31-85 | 24                |
| 12-17-84 | 41                | 02-01-85 | 212               |
| 12-01-84 | 26                | 02-02-85 | 41                |
| 12-19-84 | 35                | 02-03-85 | 25                |
| 12-20-84 | 113               | 02-04-85 | 13                |
| 12-21-84 | 45                | 02-05-85 | 27                |
| 12-22-84 | 290               | 02-06-85 | 17                |
| 12-23-84 | 58                | 02-07-85 | 10                |
| 12-24-84 | 21                | 02-08-85 | 14                |
| 12-25-84 | 27                | 02-09-85 | 14                |
| 12-26-84 | 9                 | 02-10-85 | 13                |
| 12-27-84 | 14                | 02-11-85 | 8                 |
| 12-28-84 | 101               | 02-12-85 | 14                |
| 12-29-84 | 30                | 02-13-85 | 34                |
| 12-30-84 | 55                | 02-14-85 | 17                |
| 12-31-84 | 29                | 02-15-85 | 18                |
| 01-01-85 | 10                | 02-16-85 | 26                |
| 01-02-85 | 13                | 02-17-85 | 8                 |
| 01-03-85 | 37                | 02-18-85 | 10                |
| 01-04-85 | 217               | 02-19-85 | 28                |
| 01-05-85 | 62                | 02-20-85 | 23                |
| 01-06-85 | 59                | 02-21-85 | 7                 |
| 01-07-85 | 17                | 02-22-85 | 28                |
| 01-08-85 | 12                | 02-23-85 | 20                |
| 01-09-85 | 54                | 02-24-85 | 16                |
| 01-10-85 | 27                | 02-25-85 | 9                 |
| 01-11-85 | 30                | 02-26-85 | 8                 |
| 01-12-85 | 76                | 02-27-85 | 16                |
| 01-13-85 | 56                | 02-28-85 | 7                 |
| 01-14-85 | 32                |          |                   |
| 01-15-85 | 43                |          |                   |
| 01-16-85 | 66                |          |                   |

TABLE 3

## REACTOR OPENING EMISSIONS

Per 41-CFR-61.70 (c) (3)

-5      Kg VCM Emissions  
 LIMIT: 2.000 X 10 -----  
                  Kg PVC Produced

| DATE     | C PER 61.70 (q) (5) (i) | DATE     | C PER 61.70 (q) (5) (i) |
|----------|-------------------------|----------|-------------------------|
|          | -5                      |          | -5                      |
| 09-03-84 | 0.2988 x 10             | 11-13-84 | 2.0186 x 10             |
| 09-04-84 | 0.0976 x "              | 11-13-84 | 1.0150 x "              |
| 09-06-84 | 0.3106 x "              | 11-15-84 | 1.4948 x "              |
| 09-07-84 | 11.3636 x "             | 11-16-84 | 0.0682 x "              |
| 09-10-84 | 0.2394 x "              | 11-20-84 | 0.1022 x "              |
| 09-11-84 | 0.6416 x "              | 11-21-84 | 2.4992 x "              |
| 09-13-84 | 1.2114 x "              | 11-22-84 | 1.9620 x "              |
| 09-14-84 | 0.0279 x "              | 11-26-84 | 0.7336 x "              |
| 09-16-84 | 0.2520 x "              | 11-27-84 | 0.1574 x "              |
| 09-16-84 | 0.3559 x "              | 11-29-84 | 1.5976 x "              |
| 09-19-84 | 0.0739 x "              | 11-30-84 | 0.8166 x "              |
| 09-20-84 | 0.9542 x "              | 12-02-84 | 0.3981 x "              |
| 09-21-84 | 0.7096 x "              | 12-03-84 | 0.2023 x "              |
| 09-25-84 | 1.2652 x "              | 12-04-84 | 3.0329 x "              |
| 09-25-84 | 0.7253 x "              | 12-06-84 | 2.9725 x "              |
| 09-26-84 | 0.4008 x "              | 12-06-84 | 97.5813 x "             |
| 10-01-84 | 0.4472 x "              | 12-07-84 | 4.5931 x "              |
| 10-02-84 | 1.1057 x "              | 12-10-84 | 0.5941 x "              |
| 10-08-84 | 2.1390 x "              | 12-10-84 | 1.4725 x "              |
| 10-09-84 | No samples              | 12-12-84 | 0.4304 x "              |
| 10-10-84 | 1.2529 x "              | 12-13-84 | 0.5495 x "              |
| 10-11-84 | 0.0853 x "              | 12-14-84 | 2.2075 x "              |
| 10-15-84 | 0.0893 x "              | 12-14-84 | 1.1792 x "              |
| 10-17-84 | 0.4442 x "              | 12-15-84 | 0.1777 x "              |
| 10-17-84 | 1.1697 x "              | 12-19-84 | 2.8022 x "              |
| 10-20-84 | 0.6066 x "              | 12-20-84 | 0.1936 x "              |
| 10-21-84 | 0.6823 x "              | 12-21-84 | 1.0214 x "              |
| 10-22-84 | 0.0124 x "              | 12-22-84 | 1.7209 x "              |
| 10-22-84 | 0.5879 x "              | 12-24-84 | 0.0640 x "              |
| 10-23-84 | 1.2928 x "              | 12-25-84 | 0.3081 x "              |
| 10-24-84 | 0.0370 x "              | 12-26-84 | 0.0877 x "              |
| 10-25-84 | 0.1647 x "              | 12-27-84 | 0.4247 x "              |
| 10-28-84 | 0.0880 x "              | 12-28-84 | 0.1611 x "              |
| 10-29-84 | 0.5793 x "              | 12-28-84 | 1.7001 x "              |
| 10-30-84 | 2.3152 x "              | 01-03-85 | 1.6357 x "              |
| 10-31-84 | 0.2467 x "              | 01-04-85 | 1.9780 x "              |
| 11-06-84 | 0.1728 x "              | 01-10-85 | 1.1394 x "              |
| 11-07-84 | 1.1546 x "              | 01-11-85 | 0.1239 x "              |
| 11-08-84 | 0.3649 x "              | 01-14-85 | 0.1806 x "              |
| 11-08-84 | 0.1186 x "              | 01-14-85 | 8.1684 x "              |
| 11-09-84 | 0.3260 x "              | 01-15-85 | 0.7005 x "              |
| 11-13-84 | 0.7027 x "              | 01-15-85 | 0.3402 x "              |

TABLE 3 (cont'd)

## REACTOR OPENING EMISSIONS

Per 41-CFR-61.70 (c) (3)

-5 Kg VCM Emissions  
 LIMIT:  $2.000 \times 10$  -----  
                     Kg PVC Produced

| DATE     | C PER 61.70 (g) (5) (i) |
|----------|-------------------------|
| ----     | -----                   |
|          | -5                      |
| 01-16-85 | 39.2963 x 10            |
| 01-16-85 | 0.1089 x "              |
| 01-16-85 | 0.1778 x "              |
| 01-24-85 | 0.3791 x "              |
| 01-25-85 | 0.9890 x "              |
| 01-28-85 | 0.2712 x "              |
| 01-28-85 | 0.2068 x "              |
| 01-30-85 | 0.4179 x "              |
| 01-31-85 | 0.8511 x "              |
| 02-01-85 | 5.6043 x "              |
| 02-01-85 | 0.5019 x "              |
| 02-04-85 | 0.2075 x "              |
| 02-05-85 | 0.3997 x "              |
| 02-08-85 | 0.3368 x "              |
| 02-11-85 | 0.8875 x "              |
| 02-11-85 | 0.0019 x "              |
| 02-12-85 | 0.6715 x "              |
| 02-13-85 | 0.0395 x "              |
| 02-18-85 | 3.4474 x "              |
| 02-19-85 | 0.3785 x "              |
| 02-21-85 | 0.7539 x "              |
| 02-22-85 | 0.0764 x "              |
| 02-25-85 | 2.3992 x "              |
| 02-25-85 | 1.4129 x "              |