

~~Yes "Black Books"~~

TO: Distribution

FROM: T. G. Grumbles

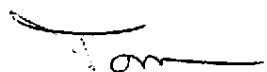
DATE: June 3, 1986

Interoffice
Communication

SUBJ: COMPLIANCE PLANS SCHEDULE

VISTA

Attached is the final schedule, according to Conoco, for Compliance Plan action items and steps.



Thomas G. Grumbles

ajo/9

Attachment

Distribution:

R. A. Conrad
G. E. Hopkins
H. G. Garrison
S. H. Christiansen
J. Friend
R. A. Frohreich
D. E. Michaels
D. Hansen
W. L. McClain
M. G. Hayes

VVV 000017026



H. Jack Neeld
Director, Environmental Programs
Environmental Conservation

Conoco Inc.
Marland Building
P.O. Box 2197
Houston, TX 77252
(713) 293-3641

JUN 1 1986

May 30, 1986

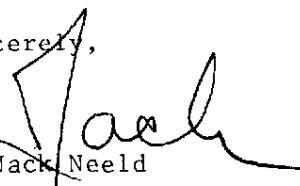
Mr. Thomas Grumbles
Vista Chemical Company
15990 North Barkers Landing Road
Houston, Texas 77079

Dear Tom:

The attached is the final schedule concerning Consent Decree or Compliance Plan items which Conoco and Vista are needing to watch. Garvin has incorporated the Vista review comments from the draft schedule.

If you have questions, please give me a call.

Sincerely,



H. Jack Neeld

HJN/ljt

Attachment

cc: B. McClain
B. Raffle
T. Thoem

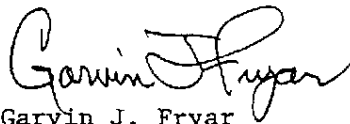
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Interoffice Communication

To H. J. Neeld
From G. J. Fryar
Date May 27, 1986
Subject Compliance Plan Schedules - VCM Consent Decrees

Draft schedules were issued to you on April 30 for review purposes. Your comments and those of Vista, as received from you on May 22, have been incorporated into the attached tables entitled "Overall Schedules" and "Action Step Checklist". The revisions basically reflect redefinition of the date of filing of the compliance plans with district court to be day "1" rather than day "0" in the calendar sequence.

Extra copies of this letter are provided for transmittal to Vista should you consider that appropriate.



Garvin J. Fryar
Supervising Engineer
Special Projects Section
Process Engineering Division

lk
att

cc: H. J. Neeld (5)
Paulette Wilson (Legal Department - Houston)
W. R. Finch
V. H. Melquist
W. A. Kitchen
H. R. Couch

File A-130.80

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TABLE I

OVERALL SCHEDULESVCM CONSENT DECREES

(Revised 5/23/86)

<u>Action</u>	<u>COMPLETION DATE, ACTUAL (REGULATED)</u>		
	<u>Aberdeen</u>	<u>Okla. City</u>	<u>VCM Plant</u>
I. <u>Consent Decree Approval</u>	8/19/85	8/21/85	8/19/85
II. <u>"114" Letter</u>	(9/18/85)	-	(9/18/85)
III. <u>Compliance Plan</u>			
A. First Draft Submittal	10/18/85	10/21/85	10/18/85
B. Final Draft Approval	4/3/86	3/26/86	2/7/86
1. Definitive Process Designs	(6/1/86)	(4/24/86)	(8/6/86)
2. Administrative Steps	(12/28/86)	(12/20/86)	(8/6/86)
3. Place Contracts/P.O.'s	(9/29/86)	-	-
4. Start Construction	(10/29/86)	-	-
5. Complete Construction	(1/27/87)	(11/20/86)	(4/6/87)
6. Activate Projects	(2/26/87)	-	-
IV. <u>Consent Decree Termination</u>	(4/27/87)	(2/20/87)	(7/6/87)
V. <u>Reports Copied To EPA</u>			
A. State Semi Annual Reports	(1)	(1)	(1)
B. Relief Valve Discharge Reports		(As Applicable)	
C. National Response Center Reports		(As Applicable)	
D. EPA Quarterly Progress Reports ⁽²⁾	(10/15/86)	(7/15/86)	4/15/86 ⁽³⁾
	(1/15/87)	(10/15/86)	(7/15/86)
	(4/15/87)	(1/15/87)	(10/15/86)
			(1/15/87)
			(4/15/87)
			(7/15/87)
VI. <u>Project Cost Audit (By Conoco)</u> ⁽⁴⁾	4/15/89	1/15/89	9/15/89

Notes: (1) Semi annual reports are submitted by September 15 and March 15 of each year.

(2) Quarterly progress reports are to be submitted "within fifteen days of the end of such quarter" commencing with the first full quarter following approval of the individual compliance plan.

(3) This report was issued one quarter earlier than mandated. The first official report is due by 7/15/86.

(4) All audits must be completed by the times indicated.

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TABLE II

ACTION STEP CHECKLISTCOMPLIANCE PLANSVCM CONSENT DECREES

(Revised 5/23/86)

<u>ACTION STEP</u>	<u>Action Type</u>	<u>Plan Ref. Page</u>	<u>Elapsed Time, Days (Mo)</u>	<u>Compliance Date</u>
I. ABERDEEN PVC PLANT				
A. Class "A" Process Designs				
1. New Valve Positioners (70)	Project	25-27	60	6/1/86
2. PR and TR for BWS	Project	28-29	60	6/1/86
3. LI on Blowdown Tank	Project	14	60	6/1/86
B. Award Contracts or P.O.'s For Items I.A.1-3	Project	14,27,29	180	9/29/86
C. Initiate On-Site Construction For Items I.A.1-3	Project	14,27,29	210	10/29/86
D. Initial Retraining on Steam Stripping and Reactor Slurry Sampling	Admin.	8,47	270	12/28/86
E. Initial Retraining on Power Failure Procedures, Emergency Kill, Rx Emptying Procedures, Emergency Air System Procedures, and Emergency Generator System Procedures	Admin.	15,47	270	12/28/86
F. Initial Retraining on Rupture Disc. Handling & Installation (Mtce. Personnel)	Admin.	15,47	270	12/28/86
G. Initial Retraining on VCM Unloading Procedures	Admin.	16,47	270	12/28/86
H. Initial Retraining on Equip. Opening Procedures	Admin.	22,47	270	12/28/86
J. Initial Retraining on Leak Detection and Elimination Plan	Admin.	25,47	270	12/28/86
K. Initial Retraining on Waste Water Stripping	Admin.	30,47	270	12/28/86
L. Complete Construction of Items I.A.1-3	Project	14,27,29	300	1/27/87
M. Commence Operation of Items I.A.1-3	Project	14,27,29	330	2/26/87

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Table VI
Page 2

<u>ACTION STEP</u>	<u>Action Type</u>	<u>Plan Ref. Page</u>	<u>Elapsed Time, Days(Mo)</u>	<u>Compliance Date</u>
<u>II. OKLAHOMA CITY PLANT</u>				
A. Class "A" Process Design - PR & TR for BWS	Project	I-24,25	30	4/24/86
B. Detailed Description of Method For Determining Batch Size	Admin.	I-28 & I-33	-	5/8/86
C. Installation Item II.A.	Project	I-28	240	11/20/86
D. Revision of Plant RCRA Manual and Std. Operating and Mtce. Procedures Manual	Admin.	I-18	270	12/20/86
E. Upgrading of Refresher (Operations) Training Procedures	Admin.	II-3	270	12/20/86
F. Revisions to Operating Manuals	Admin.	II-4	270	12/20/86
<u>III. VCM PLANT</u>				
A. Review and Update Plant Wide Routine Preventative Mtce. Program	Admin.	1-4	(6)	8/6/86
B. Review and Update Operating Procedures for Minimizing Bypasses, Etc.	Admin.	1-4	(6)	8/6/86
C. Formalize Training Program to Prevent Incinerator Bypasses	Admin.	1-4	(6)	8/6/86
D. Conduct Four Hours Annual Review Training on Environmental Matters for Operating & Maintenance Staffs	Admin.	1-9	(6)	8/6/86
E. Review and Update Operating Procedures (For HCl Tower) To Be Taken In Emergency Situations To Minimize Emissions	Admin.	2-3	-	-
F. Class "A" Process Designs	Project	1-8	(6)	8/6/86
1. In-Situ Oxygen Analyzers		1-5		
2. Incinerator Combustion Air Controls		1-5		
3. Auto Startup Controls For Standby Blower		1-6		
4. New Burner Assemblies		1-6		
5. New Flame Temperature Cascade Control For Natural Gas Flow		1-6		
6. New Reactor Vent Flow Control		1-6,7		

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Table VI

Page 3

<u>ACTION STEP</u>	<u>Action Type</u>	<u>Plan Ref. Page</u>	<u>Elapsed Time, Days (Mo)</u>	<u>Compliance Date</u>
III.F. (Continued)				
7. Flame Arrestor Level Alarms		1-7		
8. Tank Farm Vent Eductor		1-7		
9. Auto. Tie-Breaker		1-7		
10. New HCl Tower Control Scheme		1-7, 8 and 2-4		
11. New R.O.-Caustic Dryer Vent		1-8		
12. New F.I. and F.A.-L.E. Column Accumulator Vent		1-8		
13. New Adjustable High Flow Alarms For Wet and D.C. Vent Headers		1-8		
G. Install Process Designs Of Item III.F.1-13	Project	1-9	(14)	4/6/87

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