PLAINTIFF'S
EXHIBIT
CEL-783

NE0143S
File
R-6091

CELANESE
ENGINEERING RESINS, INC.

CERTIFIED MAIL
P 734 614 866

RGB-186-86 September 5, 1986

RECEIVED
SEP 10 86
ENFORCEMENT PROGRAM
TACB

Mr. W. T. Palmer, P.E.
Texas Air Control Board, Region V Director
5602 Old Brownsville Road
Corpus Christi, Texas 78415

Dear Mr. Palmer:

This letter is in response to your letter dated August 25, 1986, which addresses several concerns noted during an inspection conducted on August 7, 1986 by Ms. Deborah Stine, at the Celanese Engineering Resins (CER) Facility at Bishop, Texas. Following are the items noted in your letter and the actions that have been taken by Celanese in regards to each item. As a result of these actions, Celanese is in compliance with all applicable regulations.

A. FUGITIVE AND TANK EMISSIONS

1. QUARTERLY FUGITIVE EMISSIONS MONITORING AS REQUIRED BY TEXAS AIR CONTROL BOARD (TACB) PERMIT R-7748 HAVE NOT BEEN CONDUCTED ON A REGULARLY SCHEDULED BASIS:

As can be seen from attachment A, fugitive emissions monitoring schedule, Celanese performed quarterly emissions monitoring on a quarterly basis up to the end of 1983. At this time the person responsible for the monitoring was transferred to another area of the plant. As personnel change-over occurred frequently, the monitoring program suffered inconsistency. However, monitoring was still performed semi-annually. Now, Celanese has assigned the task of quarterly fugitive emissions monitoring to the Unit's Chemist. It will be her/his responsibility to perform the quarterly fugitive monitoring program by the end of the first month of each quarter, starting at the end of October, 1986. Additionally, it is also the responsibility of the Unit Chemist to train her/his replacement to perform the quarterly fugitive emissions monitoring in the event that she/he is transferred. Note that the quarterly monitoring program was not intentionally disregarded, as the required monitoring was performed in July, 1986, much before the scheduled inspection.

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2. THE TANK EMISSION CALCULATION FOR FIVE TANKS REQUIRED UNDER TACB PERMIT R-7748 HAVE NOT BEEN PERFORMED SINCE JUNE, 1983.

As pointed out to Ms. Deborah Stine during her visit, the data required for the tank emission calculations is (and was) available to perform such calculations. Subsequent to the inspection, by August 11, 1986, all five tank emission calculations were performed and were up-dated to July, 1986 (attachment A). To preclude a similar occurrence, the Unit Supervisor has been given the responsibility of performing the tank emission calculations for each month beginning August, 1986.

B. ASBESTOS REMOVAL AND EMISSIONS CONTROL

1. CELANESE HAS NOT BEEN PROVIDING NOTIFICATION FOR REMOVAL OF MATERIAL CONTAINING CUMULATIVE QUANTITIES OF ASBESTOS OVER 160 SQUARE FEET AS REQUIRED BY NESHAP'S REGULATIONS.

Celanese has always reported to the EPA Administrator or the TACB Executive Director, as appropriate, whenever asbestos-containing (asbestos) material was removed or stripped during demolitions or when asbestos in excess of 260 linear feet on pipes or 160 square feet on other facility components was removed during planned renovations. Records currently maintained at Celanese do not allow us to determine whether the cumulative amount of asbestos removed during individual non-scheduled operations exceeded the minimum quantities requiring notification over a one-year period. However, discussions with Mr. Ruben Pena, insulator foreman for Arthur Brothers, Inc., the onsite contractor that performs all asbestos work, indicate that the annual quantity of asbestos materials removed or stripped for non-scheduled and minor scheduled operations probably exceeds the minimum quantities requiring notification. Therefore, a notification of removal/stripping operations in 1986 where the cumulative (additive) quantity is predicted to exceed the minimum quantity is included in Attachment B.

Celanese has taken steps at the plant to begin keeping records that will allow us to accurately predict if such quantities are to be exceeded on a yearly basis in the future. Celanese will, of course, notify the TACB if the information obtained warrants notification. The attached letter to Mr. James Starks (also in Attachment B) explains the Celanese procedure for determining when notifications are required.

2. IT APPEARS THAT THE BAGHOUSE BEING UTILIZED FOR ASBESTOS CONTROL IS SCHEDULED FOR MAINTENANCE ONLY WHEN VISIBLE EMISSIONS FROM THE BAGHOUSE ARE NOTED. SINCE NESHAP'S SPECIFICALLY PROHIBITS VISIBLE EMISSIONS, IT WOULD SEEM MORE APPROPRIATE TO INSTALL A ROUTINE MAINTENANCE PROGRAM WHICH WOULD PRECLUDE THE ONSET OF VISIBLE EMISSIONS.

Currently, the baghouse in question is cleaned out on a regularly scheduled basis of once per week. Monthly preventative maintenance on this baghouse will be started by September 15, 1986. It must be noted that this baghouse is not in asbestos service continuously, but rather only when asbestos containing polymer is processed. It is estimated that this batch operation occurs approximately 20% of the time.

Celanese has performed studies to find a replacement for asbestos for this operation. Results have been favorable and it appears that asbestos use in our product line will be phased-out sometime during the 1st quarter of 1987. If this occurs, the preventative maintenance program on this baghouse will be re-evaluated.

C. VOC MONITORING

1. PERMIT R-6091 REQUIRES THAT VALVES IN VOC SERVICE BE MONITORED QUARTERLY, AND IT APPEARS THAT THIS MONITORING HAS NOT BEEN CONDUCTED. WE UNDERSTAND THAT CELANESE FEELS THAT CONTROL TECHNOLOGY AGREED TO AT THE TIME OF ISSUANCE OF THIS PERMIT WAS SUFFICIENT TO PRECLUDE THE NEED FOR MONITORING. ADDITIONAL INFORMATION ON THIS ISSUE, INCLUDING PERTINENT PREVIOUS CORRESPONDENCE AND A LISTING OF VALVES, PUMPS AND COMPRESSORS, SHOULD BE SUBMITTED TO THIS OFFICE FOR FURTHER REVIEW.

The information which Ms. Deborah Stine requested in regard to the SH-I Unit is being gathered and will be submitted by September 26, 1986. This includes a list of all the pumps and compressors and the type of seal each is equipped with. Also to be included will be a listing of all valves which are operated routinely and a listing of all control valves. Celanese understands that "valves operated routinely" means all valves which are opened and closed on a daily basis. Valves which are operated only when the SH-I Unit is started or shutdown, or when a piece of equipment or run of line is isolated, are not considered valves operated routinely. Therefore, the only valves which may be considered to be operated daily are sample valves from which samples are taken at least once per day. Minute adjustments may be made on a daily basis to control valves (e.g. pressure control valves,

level control valves, flow control valves). These valves are not "operated routinely", however, since they are always open. With reference to fugitive emissions, these control valves are more like valves which are normally left open, or closed, and are not operated daily.

The general permit provision addressing valves monitoring reads "valves operated routinely and in VOC service shall be monitored by leak-checking for fugitive emissions at least quarterly using conventional soap testing or a VOC detector". As previously mentioned, the SH-I Unit is a continuous process, the only valves opened and closed routinely are sample valves. All sample valves are smaller than 2 inch nominal size, which would preclude them from the fugitive emissions monitoring program.

Control valves are not subject to this requirement since the adjustments that are made to them are so minor. In addition, by design the SH-I Unit cannot operate safely and efficiently with any faulty control valves; therefore, if any control valve fails or starts to leak, it will be by-passed until the Unit can be shutdown for repair. Celanese provided this information to the TACB in 1978. See the enclosed letter, Attachment C, addressed to Mr. A. T. Kott, then Permit Engineer, and to Mr. Sam Crowther, Permits Section Leader, in which Celanese appealed these provisions, General Provisions -7 and F, respectively, and asked that they be deleted from the permit. The TACB Austin Office never responded to our correspondence. Celanese has since concluded that control valves are not subject to this provision since they are not "operated routinely".

You will notice that discussions with the TACB to resolve certain general and special provisions made part of the SH-I Construction Permit were begun early in 1978. It appeared that by early 1980, the SH-I Unit Permit appeal had been resolved. However, it was not until 1982 that the final Operating Permit for the SH-I Unit was issued to Celanese. By the time the operating Permit was issued, the numbering system on the general provisions was changed, which further added to the confusion.

Also, note that the final Operating Permit contains the general provision for pumps and compressors which reads "Seal systems designed and operated to prevent emissions need not be monitored." As requested by the TACB, Celanese installed double mechanical seals on all pumps handling solvent solutions and as such no monitoring for pumps was required.

Enclosed (also in Attachment C) are letters documenting that Celanese was requested to install double mechanical seals or tandem seals on all the SH-I Unit pumps and compressors. I note that Celanese was originally requested by the TACB to install double mechanical seals or tandem seal arrangements on all pumps and compressors that used a rotating shaft and were in carbon compound service, such that emissions could be prevented at service greater than 0.5 psia. Celanese commented to the TACB office in Austin, Texas, that Celanese believed that double mechanical seals or tandem seals were not required in the SH-I Unit, since the Unit would be a 100% spared pump Unit, such that leaks could be repaired without requiring a unit shutdown. This information was discussed with TACB personnel in Austin through correspondence and in several meetings held in Austin. Nevertheless, Celanese installed double mechanical seals on all pumps handling solvent solution (methanol). Those pumps handling water slurry were equipped with single mechanical seals. A check of our records indicates that we still use double mechanical seals where needed and that the Unit is essentially 100% spare pumped.

If you have any additional comments or questions, please contact Mr. Jaime Garza at (512) 584-3511, extension 4450.

Sincerely,

R. G. Brandt
Facility Manager

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