

Vista Chemical Company

Lake Charles VCM Plant
VCM Plant Rd., P.O. Box 605

Westlake, Louisiana 70669
Phone (318) 494-5000

CERTIFIED MAIL # 695 154 511
RETURN RECEIPT REQUESTED

RECEIVED

MAR 18 88

March 15, 1988

WILLIAM L. McCLAIN

VISTA

Conoco Inc.
Environmental & Engineering Group
Legal Department
P O Box 2197
Houston, TX 77252

Dear Sir:

Attached is the Vista Chemical Company VCM Plant quarterly report of vinyl chloride emissions submitted to the Louisiana Department of Environmental Quality in accordance with Section 77.11 of the Louisiana Emission Standards for Hazardous Air Pollutants. In addition, attached are telephone transcripts of three calls, plus one followup call, made to the National Response Center during this reporting period. The attached material is being submitted by Vista Chemical Company in accordance with Section V.A. of the Consent Decree entered with the United States District Court for the Western District of Louisiana on August 19, 1985, in Civil Action No. 83-2518. Please note, that by the inclusion of the respective cover letters, the materials required by the United States Department of Justice and United States Environmental Protection Agency are being submitted concurrently.

Sincerely,

R. A. Conrad

R. A. Conrad
VCM Plant Manager
Vista Chemical Co.

br

cc: G. J. Fryar
H. J. Neeld

bcc: PEM (GEH-WPS) (JGC-SCR) (WLM-JCL) MGH ERT APR

File:

482M

SAL 000064886

Vista Chemical Company

Lake Charles VCM Plant
VCM Plant Rd., P.O. Box 605

Westlake, Louisiana 70669
Phone (318) 494-5000

CERTIFIED MAIL #695 154 510
RETURN RECEIPT REQUESTED

March 15, 1988

VISTA

Director of Air, Pesticides & Toxics
U.S. Environmental Protection Agency
Region VI
1445 Ross Avenue
Dallas, TX 75202

Dear Sir:

Attached is the Vista Chemical Company VCM Plant quarterly report of vinyl chloride emissions submitted to the Louisiana Department of Environmental Quality in accordance with Section 77.11 of the Louisiana Emission Standards for Hazardous Air Pollutants (LESHAP). In addition, attached are telephone transcripts of three calls, plus one followup call, made to the National Response Center during this reporting period. The attached material is being submitted by Conoco Inc. and Vista Chemical Company in accordance with Section V.A. of the Consent Decree entered with the United States District Court for the Western District of Louisiana on August 19, 1985, in Civil Action No. 83-2518.

Sincerely,



R. A. Conrad
VCM Plant Manager
Vista Chemical Co.

br

SAL 000064887

Vista Chemical Company

Lake Charles VCM Plant
VCM Plant Rd., P.O. Box 605

Westlake, Louisiana 70669
Phone (318) 494-5000

CERTIFIED MAIL # 695 154 508
RETURN RECEIPT REQUESTED

VISTA

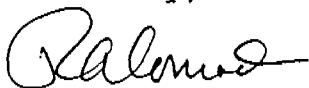
March 15, 1988

Assistant Attorney General
Land & Natural Resources Div.
United States Dept. of Justice
10th Constitution Avenue, N.W.
Washington, D.C. 20530

Dear Sir:

Attached is the Vista Chemical Company VCM Plant quarterly report of vinyl chloride emissions submitted to the Louisiana Department of Environmental Quality in accordance with Section 77.11 of the Louisiana Emission Standards for Hazardous Air Pollutants (LESHAP). In addition, attached are telephone transcripts of three calls, plus one followup call, made to the National Response Center during this reporting period. The attached material is being submitted by Conoco Inc. and Vista Chemical Company in accordance with Section V.A. of the Consent Decree entered with the United States District Court for the Western District of Louisiana on August 19, 1985, in Civil Action No. 83-2518.

Sincerely,



R. A. Conrad
VCM Plant Manager
Vista Chemical Co.

br

SAL 000064888

CERTIFIED MAIL # 695 154 509
RETURN RECEIPT REQUESTED

March 15, 1988

VISTA

Tom Coerver
Dept. of Environmental Quality
Air Quality Division
P O Box 44066
Baton Rouge, LA 70804

Dear Mr. Coerver:

The following is a quarterly report of vinyl chloride emissions for the Vista Chemical Company VCM Plant in Westlake, Louisiana submitted in accordance with Section 77.11 of the Louisiana Emission Standards for Hazardous Air Pollutants (LESHAP). This report covers the period beginning December 1, 1987 and ending February 29, 1988.

1) Oxychlorination Reactors

The vinyl chloride emission limit of 0.2 gram/kilogram of EDC produced, as prescribed in paragraph 77.3(b) of LESHAP, was not exceeded.

2) Steam Stripper

The vinyl chloride concentration of the process wastewater exposed to atmosphere did not exceed the limit of 10 ppm as prescribed in paragraph 77.6(b)(9)(i) LESHAP.

3) Slops Caustic

The vinyl chloride concentration of the slops caustic exposed to atmosphere did not exceed the limit of 10 ppm as prescribed in paragraph 77.6(b)(9)(i) LESHAP.

4) Thermal Incinerator

All major vent streams at the plant are routed to the Incinerator Unit to reduce the vinyl chloride content to less than 10 ppm. The vinyl chloride concentration in the gases exiting the Incinerator stack is continuously monitored except during calibration or repair. The Incinerator stack gas analyzer used for this purpose experienced 625 minutes downtime, excluding calibration time. During the reporting

period, no exceedance of the three hour average 10 ppm vinyl standard occurred at the Incinerator stack.

The three hour average 10 ppm vinyl standard complies with EPA NESHAP Section 61.70(c)(1). It is now understood from the 12-18-87 correspondence to R. A. Conrad from Claude M. Beasley that Vista's use of the three hour average is in error, and Vista should use a one hour average, as found in DEQ LESHAP Section 77.11(c)(1). This change in computational method was completed. Future quarterly reports will reflect this change.

The Incinerator was down or various feed gases were bypassing the Incinerator as described below. Pertinent transcripts of telephone calls made to the National Response Center are also attached.

December 17, 1987

The Wet and Dry Vents bypassed the on-line Incinerator B for 42 minutes beginning at 0915 hours on December 17, 1987. At the time of the bypass, the main plant was operating at a 0.5MM lbs. per day rate. Tank car loading was in progress, but the tank car vents were blocked in.

The bypass occurred due to a high temperature in the on-line flame arrestor. The high temperature prompted an automatic safety shutdown of the flame arrestor which in turn caused the rupture disk to burst on the Direct Chlorination Vent Header and the Wet Vent Header bypass valve to open and vent to the atmosphere.

During an Oxychlorination Unit shutdown, manual venting of the HCl Column (C-202) overhead was initiated in order to remove non-condensables in the HCl overhead product. The HCl in the vent mixed with the water in the flame arrestor and the heat of solution caused the temperature to rise and shut down the flame arrestor. (The venting was not due to clearing the HCl heater, H-309, in order to perform maintenance on an upstream control valve, as previously reported.)

The bypass condition was eliminated by starting up and directing vents into Incinerator A which had been down for repairs, and whose repairs had just been completed when the bypass occurred. Approximately 5 lbs of vinyl chloride and 8 lbs. of chloroethane were emitted to the atmosphere.

Action being taken to prevent recurrence of the same type of bypass include installation of a flame arrestor high temperature alarm that will sound before the shutdown temperature is reached, training of the incinerator operators on the impact of HCl in the vents to the incinerator, and further training for all operators on the importance of communications before and after starting a manual vent to the incinerator.

December 31, 1987

The Wet Vent Header and Direct Chlorination Vent Header bypassed the on-line Incinerator B for 30 minutes beginning at 0135 hours on December 31, 1987. At the time of the bypass, the main plant was operating at 2.3MM lbs. per day, and tank car loading was not in progress.

The bypass occurred due to a flame failure caused by a sudden increase in combustion air to the on-line Incinerator B. The off-line blower BL-901A started up automatically, sending excessive combustion air to the on-line Incinerator B, causing a flame failure in Incinerator B, resulting in the bypass.

The bypass condition was eliminated by rerouting the vents to off-line Incinerator A which was on standby. Approximately 17.2 lbs. of vinyl chloride and 30.5 lbs. of chloroethane were emitted to the atmosphere.

Action that was taken to prevent recurrence of the same type of bypass included an exhaustive simulation of the blower autostart system performed on the standby incinerator. The autostart system tested satisfactorily and is now back in service.

February 5, 1988

The Wet Vent Header and Direct Chlorination Vent Header bypassed the on-line Incinerator A for 55 minutes beginning at 1505 hours on February 5, 1988. At the time of the bypass, the main plant was operating at a 2.3MM lbs. per day rate. Tank car loading was in progress, but the tank car vents were blocked in.

The bypass occurred when the lamp test button on the burner management panel for the on-line Incinerator A was depressed during a routine preventive maintenance check. The incinerator shutdown was caused, not by a malfunction of the electronic card associated with the lamp test button, as previously reported, but rather by two defective burner management panel power

supplies. When the lamp test button was pressed, the defective power supplies excessive current draw caused a drop in voltage to the rest of the panel, causing the incinerator shutdown system to activate.

The bypass condition was eliminated by rerouting the vents to the off-line Incinerator B which was on standby. Approximately 31.7 lbs. of vinyl chloride and 30.8 lbs. of chloroethane were emitted to the atmosphere.

Action that was taken to prevent recurrence of the same type of bypass include replacement of the two defective power supplies, plus placing the lamp test system on a dedicated third power supply.

5) HCl Column

Emergency venting of the overhead vapor (>10 ppm vinyl chloride) from the HCl Column (C-202) did not occur during this reporting period.

Since Vista has interpreted that the upper section of the HCl Column is not in vinyl chloride service (>10% vinyl chloride), any incidents of HCl Column overhead venting are not covered by LESHAP but are reported in accordance with the Consent Decree and Compliance Plan entered with the United States Court for the Western District of Louisiana on August 19, 1985 in Civil Action No. 83-2518.

If you have any questions concerning this report contact E. R. Taylor, Environmental Coordinator, at (318) 494-5031.

Sincerely,



R. A. Conrad
Plant Manager
Vista Chemical Co.
VCM Plant

br(C5)

SAL 000064892

The following is a telephone notification made to the National Response Center at approximately 11:05 am December 17, 1987 concerning an incinerator bypass.

NRC: National Response Center.

ERT: This is Ed Taylor with Vista Chemical Co.

NRC: Ok sir, the company's name is Vista?

ERT: That is correct.

NRC: Mailing address?

ERT: P O Box 605, VCM Plant Road, Westlake, LA 70669.

NRC: Are you reporting on behalf of the responsible party?

ERT: That is correct.

NRC: What is the location of the spill?

ERT: The incident was in the Vinyl Chloride Plant.

NRC: Vinyl Chloride Plant?

ERT: Yes.

NRC: Is there a street address for that?

ERT: VCM Plant Road.

NRC: Ok, so it is at that location as the 1st address you gave me.

ERT: That is correct.

NRC: What county is that in?

ERT: Calcasieu.

NRC: Did this occur today sir?

ERT: Yes it did.

NRC: At what time?

ERT: From approximately 9:15 to 9:51 this morning.

NRC: What was the material released?

SAL 000064893

ERT: There were two. Vinyl Chloride - 9.1 lbs. of vinyl chloride and second Ethyl Chloride - 16.5 lbs.

NRC: 16.5 lbs. Any of these materials get into any water, sewers or drainage systems?

ERT: No. It was a air release.

NRC: Where did the material spill from?

ERT: Spilled out of the incinerator unit. It vented directly to the atmosphere. It was an incinerator bypass.

NRC: This was released to the atmosphere?

ERT: That is correct.

NRC: Were there any injuries or fatalities?

ERT: No there was not.

NRC: Any evacuations?

ERT: None.

NRC: Any property damages?

ERT: None.

NRC: Any cleanup actions taken?

ERT: None.

NRC: Have you notified any other agencies?

ERT: Yes, we have the State Emergency Planning and the local Emergency Commission. We plan on notifying the LA DEQ.

NRC: State Emergency Planning and local.

ERT: Yes, as soon as I'm done talking to you then I will talk to the DEQ.

NRC: Will call DEQ.

ERT: That is correct.

NRC: Alright sir, is there anything else?

ERT: No, that is all, with the exception that there was no injury or ill effects to life or property outside of the plant boundaries due to the height of the release and the small quantity.

NRC: One moment sir. Let me give you my name.

ERT: Ok.

NRC: F-A-V-R-E-A-U. Report number 15737.

ERT: Ok.

NRC: That's it sir, we've got everything we need.

ERT: Thank you. Goodbye.

The following is a followup call to the NRC on December 17, 1987 at approximately 11:30 am.

ERT: Hello, I'd like to speak to Ensign Favreau. This is Ed Taylor with Vista.

NRC: Alright sir, thank you Mr. Taylor for returning the call.

NRC: I just simply wanted to verify the quantities that you mentioned to me.

Ok, the vinyl chloride was 91 lbs.

ERT: No! 9.1 lbs.

NRC: I knew I had messed that up.

ERT: Great! I'm glad you got that cleared.

NRC: When I went to pass it on I said, "that doesn't sound right". And the ethyl chloride was 16.5 lbs.?

ERT: That is correct.

NRC: Alright sir.

ERT: No problem.

NRC: I just wanted to verify that.

ERT: Right. We will be following up with a written notification to the local officials within seven days.

NRC: Alright. Thank you much.

The following call is to the National Response Center in regards to an incinerator bypass. Friday, February 5, 1988 at approximately 4:50 pm.

NRC: National Response Center.

ERT: This is Ed Taylor with Vista Chemical Company in Westlake, LA. I want to report an incinerator bypass.

NRC: What sir?

ERT: An incinerator bypass.

NRC: That's a release I take it?

ERT: Yes sir.

NRC: I'll be with you in a second sir.

ERT: Ok

NRC: Your name?

ERT: Ed Taylor.

NRC: Area code and phone number?

ERT: (318) 494-5031.

NRC: You work for Vista Chemical?

ERT: That is correct.

NRC: Mailing address?

ERT: P O Box 605, Westlake, LA 70669

NRC: Is your company Vista Chemical the responsible party?

ERT: Yes sir.

NRC: Location of the release?

ERT: Location of release is in the VCM Plant.

NRC: What is the street address of that?

ERT: VCM Plant Road.

NRC: That's easy enough.

SAL 000064897

ERT: I think so.

NRC: That's also Westlake sir?

ERT: Yes.

NRC: What parish is that in?

ERT: Calcasieu.

NRC: Date and time of release?

ERT: Today, February 5 - time approximately 3:05 pm - 4:00 pm.

NRC: Material released sir?

ERT: There were two materials released. The first was vinyl chloride - 31.7 lbs. and the second was ethyl chloride - 30.8 lbs.

NRC: Source and cause of the release sir?

ERT: It was an incinerator bypass. Preliminary indication appeared to be some kind of malfunction of a controller. I don't have all of the details at this time but it will be followed up in a written report to state agencies.

NRC: Were there any injuries or problems like that?

ERT: No. No injuries and no exposure.

NRC: For remedial actions, did you get the incinerator fixed or the problem corrected as of now?

ERT: Yes, we started up before 4:00.

NRC: Ok sir, has DEQ been notified?

ERT: No, they are next on the list of people to call.

NRC: Ok Mr. Taylor. You've answered all my questions. Are there any questions I can answer for you?

ERT: No sir. We don't believe there has been any danger or threat to human health or the environment due to the location of the incinerator stack and the height of the stack. So it was pretty much a release to the upper atmosphere.

NRC: Ok sir, thank you.

ERT: Thank you.

The following is a transcript of a call to the NRC at 3:33 am associated with an incinerator bypass.

NRC: National Response Center.

GEH: This is George Hopkins with Vista Chemical Co.

NRC: Yes sir, how can I help you?

GEH: I need to report a release.

NRC: Certainly sir, if you give me 10 seconds, I'll be right back.

NRC: Ok, thanks for waiting sir. Your name?

GEH: George H-O-P-K-I-N-S.

NRC: You're calling on behalf of Vista Chemical Co.?

GEH: Yes.

NRC: V as in Victor I-S-T-A?

GEH: Yes.

NRC: Phone number please Mr. Hopkins?

GEH: (318) 494-5062.

NRC: Mailing address for Vista Chemical Company?

GEH: P O Box 605, Lake Charles VCM Plant, Westlake, LA 70669

NRC: Sir, is Vista Chemical responsible for the release?

GEH: Yes.

NRC: It occurred at the Westlake address?

GEH: Yes.

NRC: What parish is that in?

GEH: Calcasieu.

NRC: Ok, that was the VCM Victor-Charlie-Michael Plant?

GEH: Yes.

NRC: Is that located on any certain road sir?

SAL 000064899

GEH: Yes. VCM Plant Road.

NRC: Did the incident occur this morning sir?

GEH: Yes.

NRC: Approximately what time sir?

GEH: It began at 1:35 am and lasted until 2:05 am.

NRC: Material released sir?

GEH: Vinyl chloride.

NRC: Ok, I'm going to have to look up a chemical code for that sir, one moment please.

NRC: Sir, do you know how much was released?

GEH: We've estimated 17.2 lbs.

NRC: Ok, this was an air release?

GEH: Yes.

NRC: The source and cause of the release?

GEH: We had a vent gas incinerator bypass.

NRC: Ok sir, the source was the vent gas incinerator. There was a bypass due to

GEH: We are not sure of the exact cause but our air flow and steam flow was erratic and we have an automatic blower autostart - a combustion air blower that kicks on automatically on certain conditions. In this instance it kicked on and resulted in too much combustion air and it blew the flame out of the incinerator.

NRC: Ok, but at this moment its due to some unknown mechanical difficulty.

GEH: Yes.

NRC: Ok, so I have the source as the vent gas incinerator and the cause was due to some unknown mechanical failure?

GEH: Yes.

NRC: Any evacuations, fatalities, injuries, or damages sir?

GEH: No.

NRC: As far as remedial action taken on the release, what was done?

GEH: We put our spare incinerator on.

NRC: I take it the leaking incinerator was shut down.

GEH: Yes. It was shut down.

NRC: Spare incinerator was brought on line? The faulty incinerator was taken off line?

GEH: Yes, until we can get it back on line.

NRC: Off line until repaired?

GEH: Yes.

NRC: Ok sir. Have you called any other agencies sir?

GEH: Not yet, I will be calling the LA DEQ as well as the State Emergency Planning Commission and the Community Emergency Coordinator after I finish this call.

GEH: I'm recording our conversation.

NRC: You're being recorded on my end as well.

NRC: So you will be calling the LA DEQ and the LA State Emergency Planning Coordinator.

GEH: Yes, and the Community Emergency Coordinator.

NRC: That just about does it. Is there anything you'd like to add at this time?

GEH: I don't believe so.

NRC: Ok sir, for your records my name is Mr. Cherry as in cherry tree.

GEH: Ok. Thank you.

NRC: Oh! one moment sir if you could. This is report No. 16271.

GEH: Ok.

NRC: That's it for us sir. Thanks for calling. Have a Happy New Year.

GEH: Alright, you too.

SAL 000064901