

EPA COMPLIANCEFUGITIVE EMISSIONSGeneral Information

The EPA requires the concentration of vinyl chloride in in-process waste water streams and vents to the atmosphere has to be less than 10 ppm. The EPA systems serve as a central collection point for all of the contaminated streams. However, the operators need to be aware of various operating procedures which do not pertain to the EPA systems but are required to meet EPA compliance of the VCM Standard under fugitive emission sources. The following will serve as guidelines (check the appropriate section in the Plant's Operating Procedures Manual for step-to-step details).

1. The sample tap (slip gauge) and liquid header bleed cannot be used to detect the presence of <sup>liquid</sup> VCM in the railcars.
2. The vapor and liquid headers' pressure for the railcar platform must be pulled down to less than 5 psig before the hoses can be disconnected at the railcars.
3. The reactors cannot be vented to the atmosphere unless there is an emergency.
4. Do not open up any piece of equipment or section of line in vinyl chloride service unless it has been purged with water to the EPA systems (water strippers).

OPERATING PROCEDURES

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5. Manual venting of VCM to the atmosphere is not allowed. Any venting of VCM needs to be ducted to the EPA purge header.
6. Any unused portions of samples containing at least 10 percent by weight vinyl chloride must be returned to the process.
7. Whenever a leak is detected from the gas chromatographs, the leak must be located and eliminated.
8. Any leaks detected during a routine patrol or the leak monitoring program are to be recorded in the log book in the shift supervisor's office.