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QUESTION 1: Our files indicate that on December 22, 1983, you reported to Mr. Jerry B. Banks of the Mississippi Department of Natural Resources a release that occurred on December 18, 1983, at your plant. The information requested in in the Consent Decree under Sections III. A.1 and 2 does not include this discharge.

RESPONSE:

Attached is a letter submitted to Mr. Jerry Banks of the Mississippi Department of Natural Resources and a memo to file from R. A. Frohreich which gives details of the December 18, 1983 release. As requested by items A.1 and 2, these letters provide the nature, cause and corrective actions for the December 18, 1983 release.

QUESTION 2: Section III.A.6.a. asks for a process flow diagram of the source (the affected equipment at the time of the emission) relative to the discharge point and ground level. This information was not included.

RESPONSE:

Section III. A. 6. a. of the September 16, 1985 submittal describes two types of VCM releases which have been previously reported in the plant's semiannual reports. One type resulted from the daily average stripped slurry VCM content being greater than 400 ppm and the other type was due to the incinerator exhaust being greater than 10 ppm VCM.

The excess emissions from the stripped slurry entered the atmosphere from the slurry blend tank and product dryer exhausts. A process flow diagram depicting the blend tanks and product dryers is provided in the attached Figure 3.

The excess emissions from the incinerator entered the atmosphere through the incinerator exhaust stack. A process flow diagram of this operation is provided in the attached Figure 4.

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QUESTION 3: In your answer to Section III. A.8. you state that operational testing of the "AMS Emergency Kill System" is not done weekly as specified in the operating manual. Why is this?

RESPONSE:

The purpose of sections IV.C.1.c. and IV. C.1.d of the Emergency AMS Kill System operating manual was to provide assurance that the manual injection line and nozzle were not plugged and that the remote operated valves would cycle properly. Section IV.C.1.f. of the operating manual calls for rodding of the reactor injection valve and nozzle once per week to ensure the inlet line is not plugged. Experience gained from the operation of the system has shown that rodding the reactor injection valve and nozzle once per week is adequate to ensure the inlet line is open. Therefore the practice of both adding AMS into the reactor through the manual injection valves and rodding out the injection port on a weekly basis has been modified such that the rodding of the manual injection nozzle is done on a weekly basis and the manual AMS injection has been discontinued.

Likewise operating experience with the remote operated system has shown that the remote operated valves always worked when tested and in emergency situations; therefore, weekly testing of these valves was discontinued. Although there has been no problem with the operation of the remote operated valves, a procedure to inject a small amount of AMS into each reactor on a monthly basis using the remote operated system will be started at the plant. This procedure will ensure proper operation of the remote operated valves and ensure that there is no pluggage in the remote operated injection lines.

Also experience gained in the testing of the system in the winter time has shown that freezing can occur if water is present in the AMS Kill System. Therefore, when the ambient temperature is below 20°F, a small amount of AMS is injected into the empty reactor through the remote operated system once per shift to ensure the AMS line to the reactor is not frozen.

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QUESTION 4: Section III. A. 10 requests a copy of the flow diagrams for various systems. Pages 71 and 72 of your "Reply Text" are listed in the table of contents as containing these diagrams. These pages were not included in your submittal to us.

RESPONSE:

We regret these pages were omitted from your copy. The two drawings, Figures 1 and 2, are attached with this letter.