conoco

Interoffice Communication

To : Vinyl Shift Supervisors

From : J. E. Barton

Date : October 30, 1979

Subject : EPA COMPLIANCE (UPDATE)

The following items are needed to assure EPA compliance regarding VCM emissions.

1. The date must be stamped on the Honeywell recorded charts each morning at 7:00 a.m. When the Honeywell charts are replaced the number of the Honeywell unit is to be written on the bottom of the chart. All used charts are to be turned in to me.

2. All VCM receivers are not to be filled above 80%.

3. The high pressure alarms on the blowdown tank in each unit are set at 30 psig.

4. The Emergency Kill Procedure:

   Runaway Reaction

   In the event of a runaway reaction the reactor will be killed with the addition of a minimum of 5 gallons AMS. A runaway reaction is defined as a 10°F increase or a 20 psig increase in 5385, 5425, 5465 resin or any temperature or pressure increase in 5305.

   The following parameters are to be the maximum limits on a runaway reaction. The reaction should be immediately killed with NO if either one of the parameters is exceeded.

Resin	Maximum Temperature	Maximum Pressure
5385, 5425, 5465	142°F	145 psig
5305	162°F	165 psig

   If the reaction is allowed to exceed these limits, it may not be controllable and result in a relief valve or rupture disc discharge to the atmosphere.

   CAUTION: NO is a highly poisonous orange-colored gas. A Scott Air Pack must be worn while killing a reactor with the NO short stop system.

EPA Compliance (Update)
October 30, 1979
Page 2

4. The Emergency Kill Procedure: - (continued)

Power Failure

During the event of a power failure the reactors must be killed with NO. The sequence of which reaction to be killed is as follows:

A. All 5305 reactors

B. Remaining reactors - the reactor in polymerization cycle the longest will be killed first.

In all cases of emergency kill the pressure rise in the reaction should continue to be monitored. If the pressure continues to rise, the following steps are to be taken:

A. Equalize the reactor with any other empty or killed reactor of the same type product.

B. If the pressure still continues to rise, vent through the main condenser valve to the recovery system and the recovered VCM receiver.

C. If this will not relieve the pressure buildup, then equalize the reactor with a reactor of different type resin.

D. The reactor pressure buildup may become sufficient to cause opening of the reactor relief valve system. It is possible that the reactor continue to increase despite the relief valve discharge. If this occurs, the manual vent should be opened as often as needed to prevent failure of the double disc relief assembly.

5. The emergency nitric oxide kill system will be pressure checked each six months with nitrogen to assure integrity.

6. After every coarse batch produced the reactor condenser will be inspected to determine if it is plugged. If the condenser is found to be plugged, it will be cleaned prior to charging the next batch.

7. Copies of the procedures for the Old Unit, New Unit, and Dryers have been placed on the table between the Lead Operators' desks in the control room. There is also a copy in the Shift Supervisor's office and Operations Supervisor's office for your reference.

Please conduct a formal review with your people on the seven items above. Write the review meeting up on the safety meeting form and return it to me.

I would like to have all meetings completed by 11/16/79.

J. E. Barton

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c: CLM, CRM, RAF, Shift Supervisors (5)