

CONOCO CHEMICALS COMPANY
VCM PLANT DISCHARGE REPORTS

1. Reports of relief discharges pursuant to 40 CFR, §61.65(a)¹:

<u>DATE OF DISCHARGE</u>	<u>DATE OF REPORT</u>	<u>AMOUNT OF DISCHARGE</u> <u>(lbs)</u>
<u>1979</u>		
1. 10/03/79	10/11/79	<u>1,534</u>
1979 Subtotal		= 1,534
<u>1980</u>		
2. 07/16/80	07/22/80	4
3. 09/11/80	09/17/80	Not known
4. 10/24/80	10/31/80	2,500
5. 10/26/80	10/31/80	<u>1,990</u>
1980 Subtotal		= 4,494
6. 08/25/81	08/30/81	77
7. 11/13/81	11/18/81	600
8. 11/13/81	11/18/81	<u>384</u>
1981 Subtotal		= 1,070
Total to Date		= 7,098+

¹ We are aware of an additional discharge of 1,671 lbs VCM which occurred on 11/04/81, and was reported to EPA's National Response Center.

- B. Provide a copy of all instructions given to employees since January 19, 1977, regarding prevention of relief discharges of VCM.
 - C. Identify and describe all actions taken since January 19, 1977, to prevent relief discharges caused by operator error for each of the following:
 - (1) Failure to check block valves and vent lines or equipment before startup.
 - (2) Improper adjustments of pressure-controlling instrumentation on the vinyl column.
 - D. If Conoco is aware of any equipment, device and/or alternative procedures that could be used to prevent the employee errors/inattention, which have been identified, please describe each and state the reasons why they have not been implemented.
4. Please provide a dated copy of all documents or portions thereof regarding (1) standard operating and maintenance (O & M) procedures, (2) testing and installation procedures and (3) training manuals (or other instructions) which have been employed at the VCM plant since January 19, 1977, which relate to prevention of relief discharges of VCM from equipment in VCM service.
5. For each discharge listed in Enclosure I as being caused, in whole or in part by equipment malfunction or defect, please provide the following information:
- A. Describe in detail the cause of the malfunction or defect which resulted in the VCM discharge.
 - B. Describe the applicable inspection and maintenance procedures for the equipment that malfunctioned and identify the frequency of inspection required by each procedure. If the actual inspection/maintenance frequency of the affected equipment is not consistent with the required procedure, describe the inconsistency and explain why.
6. Please provide the following information specified for the following VCM discharges listed in Enclosure I under 40 CFR 561.65(a) by Report Numbers:
- A. #2 (July 16, 1980): Describe, in detail, the cause for the "greater than anticipated" inert gas concentration in the HCl column.
 - B. #5 (October 26, 1980): Describe, in detail, the cause of the "emergency shutdown on a cracking furnace" which led to the Quench Column overpressure and thus, the relief valve discharge.
7. Studies and Other Alternatives Considered

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ENCLOSURE III

STATEMENT ON CLAIMS OF CONFIDENTIALITY

1. Section 114(c) of the Clean Air Act [42 U.S.C. 7414(c)] provides that any records, reports or information obtained by the Environmental Protection Agency under the authority of Section 114(a) shall be made available to the public. However, that section further provides that, EXCEPT FOR EMISSION DATA, access to such records, reports or information, or particular part thereof, will be denied to the public under the following circumstances. If any person makes a showing satisfactory to the Administrator of the Environmental Protection Agency that the records, reports or information, or any particular part thereof, would, if made public, divulge methods or processes entitled to protection as trade secrets of such person, then the Environmental Protection Agency (EPA) is required to consider such record, report or information, or particular part thereof, as confidential in accordance with the purposes of 18 U.S.C. 1905. Nevertheless, Section 114(c) further provides that even though access to the public is denied, such record, report or information may be disclosed to other officers, employees, or authorized representatives of the United States concerned with carrying out the Clean Air Act or when relevant in any proceeding under the Clean Air Act.
2. Public availability is also required by the Freedom of Information Act, 5 U.S.C. 552. That Act requires public availability generally of all documents in the possession of the government, with certain very narrow exceptions. One of these exceptions is for trade secrets and commercial or financial information if they have been obtained from a person and if they are privileged or confidential.
3. The regulations under which EPA handles requests by the public for information and requests by persons for confidential treatment of information are found in Part 2 of Title 40 of the Code of Federal Regulations. These regulations were published in the Federal Register, pages 36902 to 36912, on September 1, 1976. Subpart B of Part 2, beginning on page 36906, specifically addresses "Confidentiality of Business Information."
4. If you wish, you may assert a business confidentiality claim covering part or all of the records, reports, or information which you provide to EPA. Such a claim of confidentiality should be made at the time the record, report, or information is provided to EPA. If no claim has been made when the material is received by EPA, the records, reports or information may be made available to the public without further notice to you. If you do make a claim of confidentiality when providing the material to EPA, the records, reports or information covered by the claim will not be disclosed to the public, except to the extent and by means of the procedures set forth in Subpart B of Part 2 of Title 40 of the Code of Federal Regulations.
5. You should give clear NOTICE at the time you provide the material --
 - (a) That you claim confidentiality and

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ENCLOSURE II

Conoco Chemicals Company shall submit to EPA, Region 6 the following information and documentation regarding its VCM production facilities located at Westlake, Louisiana pursuant to the authority of Section 114 and subject to the sanctions of Section 113 of the Clean Air Act, as amended (42 U.S.C. 7413 and 7414).

1. Please provide a list of all relief discharges of VCM which occurred at the VCM plant and which have not been identified in Enclosure I, subsequent to January 19, 1977 and through the date of this letter. The list should include the following information for each discharge, including the VCM discharge of 1,671 pounds on November 4, 1981, which was reported to EPA's National Response Center:
 - A. Identification of the source and relief device(s), which includes the known or estimated concentration of VCM (by weight or volume percent) in the affected equipment at the time of the discharge.
 - B. Description of the nature and cause of the discharge.
 - C. Date and time (start/finish) of the discharge.
 - D. A statement confirming whether or not the affected equipment was in VC service at the time of the discharge, which is based on past and/or current service history and, if possible, supplemented by copy of applicable VC concentration analyses.
 - E. Approximate total quantity of VCM discharged in pounds and identify method used in determining the amount of VCM discharged.
 - F. Explain why the discharge was not reported to EPA under the requirements of 40 CFR, §61.65(a).
2. Please provide the information requested by Questions 1-A and 1-D and the following information only for each relief discharge of VCM listed in Enclosure I, which has been identified under 40 CFR, §61.65(a). Information required in the following, which has already been submitted, need only be referenced and not resubmitted.
 - A. A copy of the calculations, which estimate the total quantity of VCM discharge, in sufficient detail to assess the validity of such calculations.
 - B. A detailed description of all relevant corrective steps taken before and during each discharge to prevent and/or minimize the release of VCM to the atmosphere including, but not limited to, such steps as rerouting VCM emission vents to a collection vessel or incinerator.
 - C. Describe all measures taken to prevent a future occurrence of each discharge including, but not limited to, corrective measures regarding equipment changes, changes in operating and maintenance procedures, operator training and disciplinary actions. State the

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dates when each action was initiated and completed. Where information on the corrective measures has not been submitted to date, explain why this information has not been provided to EPA as required by 40 CFR, §61.10(c).

- D. Provide a copy of all documents relating to each discharge. This should include all related portions of reports regarding each discharge incident including, but not limited to:
 - (1) VCM leak detection data and daily plant logs (e.g. affected process operating logs and general plant and shift foreman logs).
 - (2) the temperature and pressure parameters of the affected equipment.
 - E. For each discharge, state whether Conoco believes it was or was not preventable and include the basis for that position.
 - F. Identify and describe any deviations from the existing standard operating and maintenance procedures, and explain the reasons for each deviation.
 - G. Describe external conditions concerning such items as weather, utility supplies and other process upsets requiring attention during each discharge.
3. Additional information is needed for each relief discharge of VCM in Enclosure I which has been identified as being caused, in whole or in part, by employee, operator or maintenance error.
- A. Please provide the following information for each discharge:
 - (1) Provide a complete description for each instance of employee error/inattention.
 - (2) Identify each employee by code name or number and position and the actions contributed to the discharge.
 - (3) Date and total time worked on the day of the discharge and on each of the 7 days prior to the discharge for each subject employee identified.
 - (4) Briefly identify all duties for which each subject employee was responsible at the time of each discharge.
 - (5) Describe the history of each subject employee's training in routine and in emergency procedures to prevent VCM discharges. Include dates and subject matter of such training.
 - (6) A copy of personnel records relating to all disciplinary actions and job performance evaluations since January 19, 1977, for each subject employee identified. Note that the employee's privacy should be maintained by substituting a code name or number for the employee's name.

Instructions for Responding to Enclosure II

For purposes of responding to Enclosure II, the following instructions apply:

1. Each copy of the documents submitted should be dated and should be marked or labeled with reference to the number and subsection of the question in response to which it is submitted.
2. In responding to questions that Conoco Chemicals Company identify a person, the answer should include:
 - A. The name and business address if the "person" is a company or other business or governmental agency, and
 - B. a code name or number selected by Conoco Chemicals Company and the functional position and business address if the "person" is an individual.
3. In providing an answer to those questions requiring information for more than one discharge, please indicate clearly to which discharge you are referring.

In responding to Enclosure II, the following definitions apply:

1. "Document" means all writings, whether printed, recorded or reproduced by any mechanical process, or written or produced by hand, including: studies, logs, reports, correspondence, memoranda, graphs, records of meetings and conferences, opinions or reports by consultants, photographs, and summaries or records of personal and telephone conversations.
2. "Conoco" means Conoco Chemicals Company and any office or branch thereof, any subsidiary and holding company, and any person employed by or under contract (or any other agreement) to Conoco Chemicals Company.
3. "VCM" means vinyl chloride monomer.
4. "The VCM plant" means the vinyl chloride monomer production and railcar/ship loading facilities owned and/or operated by Conoco Chemicals Company at Westlake, Louisiana.
5. "Person" means an individual, firm, partnership, association, corporation or other business or governmental entity.
6. "Emergency relief discharge(s) of VCM" has the same meaning as defined in 40 CFR, 551.65(a).
7. "Relief discharge of VCM" means any discharge of VCM to the atmosphere from equipment in vinyl chloride service that occurs:
 - (1) unintentionally for any reason other than minor leaks or
 - (2) in any manner which is designed or intended to relieve, reduce or prevent pressure that is considered to be excessive within the equipment.