

TO: Distribution

FROM: D. R. Booth
DATE: July 10, 1990

Interoffice
Communication

SUBJECT: EPA's Section 114 Request Response

VISTA

Enclosed is the final Section 114 Response. It was prepared through the efforts of the following team:

Glen Hollinger
Dana Neely
Ray Plewa
Sean Shephard
Sam Watson

I would like to thank each team member for his/her contributions, all of which made this response possible in a timely and professional manner.

This report provides a valuable service for the future.

D.R. Booth

D. R. Booth
Sr. Environmental Coordinator

br(5)

Distribution

JF CRD MGH RAP SPS (LCCP)
JWW AAS (LCLAB)
RAC SAR GWB SAW DRB (VCM)
JCL WLM DMN GMH TWH (Houston)

VVV 000026642

Vista Chemical Company

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

Westlake, Louisiana 70669
Phone (318) 494-5000

CERTIFIED MAIL #906 689 532
RETURN RECEIPT REQUESTED

June 28, 1990

CONFIDENTIAL

VISTA

Ms. Penny Lassiter
U.S. Environmental Protection Agency
Office of Air Quality Planning & Standards
Research Triangle Park
North Carolina 27711

Dear Ms. Lassiter:

In response to Jack R. Farmer's letter of March 16, 1990 and your letter received in April, the following items are being submitted.

- 1) Enclosure 1, revised to include the additional production data requested.
- 2) Enclosure 2 for Vista's Ethylene Unit (Process 1), LAB Plant (Process 6), and one submission for both EDC Process (Processes 2 & 5) and the Vinyl Chloride Process (Process 4).

As you recall, you waived the request for information regarding the Alcohols Unit (Process 8) during our phone call in April.

In addition Vista believes it necessary to caution the U.S. EPA regarding the use of this information. This data as you requested is based on 1989 operations. With the promulgation of the new Toxicity Characteristic Rule, a large number of organic chemical manufacturers will have newly regulated RCRA wastewaters. Many manufacturers are so dramatically modifying their wastewater sources, and treatment systems that the data submitted will most likely not be representative in two years. We request that this be given due consideration in the development of any new standards.

If you have any questions regarding these submittals, please refer them to David Booth of our Environmental Department at (318) 494-5031.

Sincerely,

John Friend / QRB
John Friend
Plant Manager

br(C2)

VVV 000026643

23

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April 2, 1990

VISTA

Ms. Penny Lassiter
FAX No. (919) 541-5663

Dear Ms. Lassiter:

Pursuant to EPA's letter from Jack R. Farmer dated March 16, 1990, and our telephone conversation on March 26, 1990, Vista is submitting the following via FAX.

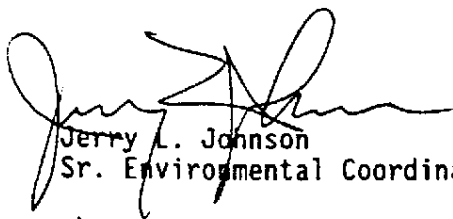
Due to the limited time available, Vista has utilized its knowledge of its SOCM I processes to determine the chemical compounds that might exist as "used" and "produced." A great number of these compounds could be produced in quantities less than 2000 pounds per year. Again, because of the limited amount of time, we have been unable to verify this; therefore, these were included in the report. We will supplement the report to make any clarifications or corrections as needed.

The letter requested information on a "vinyl acetate" process. Vista does not operate and has not operated such a facility.

Developing the information required for enclosure 2 could not reasonably be accomplished in less than 120 days. Vista would request that if enclosure 2 information is required, that Vista would be allowed 120 days to respond.

Should you have a problem with FAX clarity, contact me at (318) 494-5439. Should you require additional information about this submittal, please contact the technical contacts listed. If possible, in the future it would be appreciated if requests could also be forwarded to Mr. David Booth, (318) 494-5031, at Vista's VCM Plant at P. O. Box 605, Westlake, Louisiana 70669.

Very truly yours,



Jerry L. Johnson
Sr. Environmental Coordinator

mbr
Enclosures

bcc: JF CRD MGH DRB AAS WLMcc JCL

VVV 000026645

TABLE 1-1 A ADDITIONAL PROCESS UNITS WHICH PRODUCE OR USE MAP'S

Company Name Vista Chemical Company
 Facility Location Lake Charles, Louisiana
 Primary SIC Code 2869
 Secondary SIC Code _____
 Technical Contact CHARLES DUTRA
 Telephone Number 318-494-5347

Process Name	Process ID	List of MAP's in Process Used Produced	Process ^a Type	Product(s)	Nominal Production Capacity (Design) (lbs/yr)	1989 Production (lbs/yr)
ETHYLENE	✓ 1	0-89 0-14	CONT.	-ETHYLENE	700,000,000	699,500,000
		0-18		-LIGHT AROMATIC CONCENTRATE		26,900,000
		0-22		-HEAVY AROMATIC DISTILLATE		16,300,000
		0-68		-C ₄ -CONCENTRATE		34,300,000
		0-84		-PROPANE AND PROPYLENE		21,700,000
		0-104		-HYDROGEN OFF GAS		135,800,000
		0-112				
		0-125				
		0-130				
		0-146				

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^aIdentify whether batch, continuous, or semicontinuous

TABLE 1-1 (A) ADDITIONAL PROCESS UNITS WHICH PRODUCE OR USE MAP's

Company Name Vista Chemical Company
 Facility Location Lake Charles, Louisiana
 Primary SIC Code 2869
 Secondary SIC Code _____
 Technical Contact GRAHAM BACON
 Telephone Number 318 494-5025

Process Name	Process ID	List of MAP's in Process	Process*	Product(s)	Nominal Production Capacity (Design) (lbs/yr)	1989 Production (lbs/yr)
		Used	Type			
ETHYLENE	✓ 2	0-25	CONT.	ETHYLENE	629,000,000	490,000,000
DICHLORIDE		0-31		DICHLORIDE		9,885,000*
(DIRECT CHLORINATION)		0-70		HEAVY ENDS		907,000*
		0-72		LIGHT ENDS		
		0-128				
		0-129				
		0-135				
		0-144				

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*Identify whether batch, continuous, or semicontinuous

*Includes both Direct Chlorination & Oxidation production.

TABLE 1-1 (A) ADDITIONAL PROCESS UNITS WHICH PRODUCE OR USE MAP's

Company Name Vista Chemical Company
 Facility Location Lake Charles, Louisiana
 Primary SIC Code 2869
 Secondary SIC Code _____
 Technical Contact CHARLES DUTRA
 Telephone Number (318) 494 5347

Process Name	Process ID	List of MAP's in Process Used Produced	Process ^a Type	Product(s)	Nominal Production Capacity (Design) (lbs/yr)	1989 Production (lbs/yr)
METHYL CHLORIDE	Nº 3	0-89 0-70 0-91	CONT.	METHYL CHLORIDE	100,000,000	65,400,000

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TABLE 1-1 A ADDITIONAL PROCESS UNITS WHICH PRODUCE OR USE MAP's

Company Name Vista Chemical Company
 Facility Location Lake Charles, Louisiana
 Primary SIC Code 2869
 Secondary SIC Code _____
 Technical Contact GRAHAM BACON
 Telephone Number (318)-494-5025

Process Name	Process ID	List of MAP's in Process Used	Produced	Process ^a Type	Product(s)	Nominal Production Capacity (Design) (lbs/yr)	1989 Production (lbs/yr)
VINYL CHLORIDE	✓ 4	0-72	0-14	CONT.	VINYL	825,000,000	731,000,000
		0-25	0-22		CHLORIDE		
			0-25		HEAVY ENDS	2,926,000	
			0-31				
			0-33				
			0-70				
			0-91				
			0-135				
			0-136				
			0-144				
			0-145				

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^aIdentify whether batch, continuous, or semicontinuous

TABLE 1-1b. ADDITIONAL PROCESS UNITS WHICH PRODUCE OR USE MAP's

Company Name Vista Chemical Company
 Facility Location Lake Charles, Louisiana
 Primary SIC Code 28 69
 Secondary SIC Code _____
 Technical Contact GRAHAM BACON
 Telephone Number (318) 494-5025

Process Name	Process ID	List of MAP's in Process Used	Produced	Process ^a Type	Product(s)	Nominal Production Capacity (Design) (lbs/yr)	1989 Production (lbs/yr)
ETHYLENE	5		0-25	CONT.	ETHYLENE	795,000,000	676,000,000
DICHLORIDE			0-31		DICHLORIDE		
(OXY- CHLORINATION)			0-33		HEAVY ENDS	9,885,000 ⁺	
			0-70		LIGHT ENDS	707,000 ⁺	
			0-72				
			0-135				
			0-136				
			0-144				
			0-145				

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^aIdentify whether batch, continuous, or semicontinuous

* Includes both Direct Chlorination and Oxygenation production.

VVV 000026650

TABLE 1-1b. ADDITIONAL PROCESS UNITS WHICH PRODUCE OR USE HAP's

Company Name Vista Chemical Company
 Facility Location Lake Charles, Louisiana
 Primary SIC Code 2869
 Secondary SIC Code _____
 Technical Contact A. A. SALAH
 Telephone Number (318) 494-5735

Process Name	Process ID	List of HAP's in Process		Process ^a Type	Product(s)	Nominal Production Capacity (Design) (lbs/yr)	1989 Production (lbs/yr)
		Used	Produced				
LINEAR ALKYL BENZENE	✓ 6	0-14	0-84 0-104	CONT.	- DETERGENT ALKYATES - PACUL STRIPPER OVERHEADS	2,090,000,000	139,000,000 3,433,736 *

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^aIdentify whether batch, continuous, or semicontinuous

* Fiscal Year - Oct 1988 - Sept 1989.

TABLE 1-1b. ADDITIONAL PROCESS UNITS WHICH PRODUCE OR USE HAP's

Company Name Vista Chemical Company
 Facility Location Lake Charles, Louisiana
 Primary SIC Code 2869
 Secondary SIC Code _____
 Technical Contact CHARLES DUTRA
 Telephone Number (318) 494 5347

Process Name	Process ID	List of HAP's in Process Used Produced	Process* Type	Product(s)	Nominal Production Capacity (Design) (lbs/yr)	1989 Production (lbs/yr)
ETHOXYLATE #1	7	0-74	BATCH	ETHOXYLATE	65,000,000	37,900,000
		0-63				
		0-73				
		0-78				

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*Identify whether batch, continuous, or semicontinuous

TABLE 1-1b. ADDITIONAL PROCESS UNITS WHICH PRODUCE OR USE MAP's

Company Name Vista Chemical Company
 Facility Location Lake Charles, Louisiana
 Primary SIC Code 2869
 Secondary SIC Code _____
 Technical Contact CHARLES DUTRA
 Telephone Number (518) 494-5347

Process Name	Process ID	List of MAP's in Process Used	Process ^a Type	Product(s)	Nominal Production Capacity (Design) (lbs/yr)	1989 Production (lbs/yr)
ALCOHOL	✓ 8 NO.	0-84 Hexane.	CONT.	-ALCOHOLS -STRIPPER OVERHEADS -ALUMINA	235,000,000	229,000,000

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