

Vista Chemical Company

Lake Charles Chemical Plant
Old Spanish Trail, P.O. Box 727

Westlake, Louisiana 70669
Phone (318) 494-5140

Copy to JCL, Orig 1:1

April 10, 1990

Mr. Gustave Von Bodungen, Administrator
Office of Air Quality
Department of Environmental Quality
Post Office Box 44096
Baton Rouge, Louisiana 70804

RECEIVED

APR 12 90

WILLIAM L. McCLAIN

Dear Mr. Von Bodungen:

We are requesting that your office approve a temporary change in location of emissions and a subsequent emissions reduction. The transfer is being necessitated by the March 7 Final Rule, NESHAP, Benzene Emissions From Benzene Waste Operations, and March 28, 1989 Final Toxic Characteristic (TC) Rule. These rules will have profound impact on Vista Chemical's Lake Charles Chemical Complex (LCCC) and compliance with them will require rapid and costly responses.

Wastewater from our operations have historically been biologically treated in the LCCC wastewater treatment system. At times the Chemical Plant system taking wastewater from the VCM Plant and vice versa. The NPDES permit for the facility provides for switching flows back and forth to optimize treatment.

For LCCC to achieve compliance with the NESHAP rule and the TC rule, Vista must promptly implement several projects to modify our wastewater handling systems.

As part of that project, Vista will change the service of Tank T-915 from No. 6 fuel oil storage to an NPDES wastewater surge tank. The tank will be modified to comply with the NESHAP standard for benzene waste operations practically two years before the March 7, 1992 deadline. The modifications will include a floating roof and containment features. Attachment 1 contains the information needed to notify of the change in tank service.

Vista will store wastewater that is currently being treated in the Chemical Plant biological treatment system in Tank T-915. This water will then be sent to the VCM Plant biological treatment system. This will decrease the fugitive emissions from the Chemical Plant system while increasing the fugitive emissions from the VCM system.

The emissions transferred to the VCM Plant will be significantly reduced when Vista constructs and operates the Steam Stripper/Dilution Steam System that will remove benzene and other hydrocarbons from wastewater going to T-915 and from other wastes. This will be done as part of the expansion and modification of the Ethylene Plant, Permit No. 0520-00003-01. Attachment 2 is a tentative schedule for reduction with the estimated emissions. Toluene is the only other hydrocarbon with significant contributions.

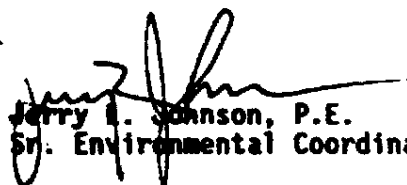
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Since these fugitive emissions being transferred are not new emissions, Vista requests that the transfer be exempt from the permitting process and that Vista be allowed to commence the wastewater transfer by April 16, 1990.

Your prompt attention and approval of this request will be appreciated. Should you require additional information, please contact me at (318) 494-5439.

Very truly yours,


Jerry L. Johnson, P.E.
Sr. Environmental Coordinator
mbr

bcc: JF PDC MGH CRD JCS DRB WLMcc

ATTACHMENT 2

ESTIMATED EMISSIONS FROM
BENZENE WASTEWATER OPERATIONS

DESCRIPTION	DURATION	FLOW*	ESTIMATED BZ	EMISSIONS TOL	(LBS) TOTAL
<u>1990</u>					
Wastewater Transfer Begins	4/16-6/15	250	10,958	1,204	12,162
Ethylene Plant Turnaround	6/16-8/15	100	14		14**
Ethylene Plant Startup	8/16-9/30	400	13,144	1,445	14,588
Steam Stripper Startup	10/1-12/31	200	76	55	131
<u>1991</u>					
Normal Operation	1/1-12/31	200	303	219	522

*Flow consists of wastewater from Ethylene Plant and LAB Plant.

**LAB contribution will not be reduced during ethylene turnaround.

ASSUMPTIONS

1. All Benzene in LAB waste is emitted.
2. All benzene and Toluene in the water is emitted to the atmosphere after installation of the steam stripper system (no accounting for bio-degradation which occurs).



ATTACHMENT 1
State of Louisiana
Department of Environmental Quality



BUDDY ROEMER
Governor

CHANGE OF TANK SERVICE

PAUL TEMPLET
Secretary

PERMITTED FACILITY: VISTA CHEMICAL CO.
PHYSICAL LOCATION: Old Spanish Trail
NEAREST CITY: Westlake **PARISH:** Calcasieu
CONTACT PERSON: Michael G. Hayes
MAILING ADDRESS: P.O. Box 727 ; Westlake, La. 70669
DATE OF REQUEST: April 10, 1990

TANK(S) CHANGE SERVICE

Point Source I.D. Number(s): T7 - 915

Description of Tank(s): No. 6 Fuel Oil Tank

Control Device(s): None prior to 4/10/90 (refer below)

Material(s) Currently Stored in Tank(s): *6 Fuel Oil or equivalent

Material(s) To Be Stored in Tank(s): NPDES Waste Water

Condition(s) Of Storage: Ambient

NSPS Applicability: No

EMISSIONS BEFORE: 0.231 Tons/year **AFTER:** 0.9 Tons/year

DATE OF SERVICE CHANGE: 4/10/90

OTHER INFORMATION: Internal floating roof installed to comply with NESHAP prior to NPDES Waste Water service.

This is to inform you that the above change of service has been approved under LAC 33:III.505.B. All current permits shall remain in effect.

Assistant Secretary

DATE

cc: _____ Regional Office

Reviewer

VEV-182122

OFFICE OF AIR QUALITY P.O. BOX 44096 BATON ROUGE, LOUISIANA 70804

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