

fil. *Deer Park Plantation*
(Ind. Hyg.)

Diamond Shamrock

Interoffice Correspondence

To: V. F. Pisani
From: D. R. Muehlenbrock
Date: July 19, 1983

Subject: Safety, Environmental and VCM Reduction Report - June, 1983

cc: D. E. Black/D. C. Parkhill
~~B. Christensen/L. Rabbe/R. Adams~~/R. Stannard - GCA
D. Henderson/G. Clark - Safety
G. O. Rabbe - EC
J. Worthington - Dallas
D. P. Tech File - 16.03B (2)

I. Personnel VCM Exposure

Personnel sampling during the month is summarized in this section of the report. There was one TWA value above 1 ppm out of 21 samples. On June 7, a No. 4X Plant scrub operator was exposed to 4.59 ppm; records indicate a mask was worn during the sampling.

TWA EXPOSURE (PPM)

<u>Department</u>	<u>High</u>	<u>Low</u>	<u>Average</u>	<u>Samples</u>
Resin	4.59	0.07	0.76	9
LPS	0.18	0.14	0.16	2
Lab	0.09	0.09	0.09	1
Maintenance	0.22	0.01	0.09	6
Tech., Adm., & Plant	0.12	0.01	0.08	3
Overall Plant	4.59	0.01	0.38	21

II. Residuals

<u>Product</u>	<u>High</u>	<u>Low</u>	<u>Average</u>	<u>Samples</u>
PVC 426	12.94	0.17	2.56	40
PVC 450	3.64	0.07	1.24	20
PVC 500	1.46	0.09	0.36	13

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III. Environmental Air

- A. The highest reading at the Plastics battery limits was 0.05 ppm which was recorded north of No. 4 Stripping Column. The highest reading recorded at Diamond Shamrock's property boundary was 0.04 ppm at the chlorine loading dock.

B. Leak Patrol

There were a total of 645 points checked. There were seven new leaks detected and there were none needing repair from previous audits. Five of the leaks were repaired leaving two still needing repair at month's end.

- C. There were two reportable VCM releases during the month: On June 13 approximately 1,000 lbs. of VCM were released when No. 34 Poly over-pressured and blew the rupture disc. The poly went into a heat kick which was not detected until the spill.

On June 25, approximately 1,373 lbs. were released when the blow-down tanks at 3 and 4 Plants overpressured blowing the rupture discs. The excessive pressure was the result of dropping two polys simultaneously while the gasholders were at a fairly high level.

- D. There were no reactor openings above the standard during the month.

IV. Environmental Water

- A. The highest level of VCM recorded for any of the process water sewers during the month was 0.43 ppm. This was the effluent from No. 3 Bird Centrifuge.

The highest level of VCM in the storm sewers was 0.19 ppm recorded at No. 4 Outfall.

- B. There was one violation at No. 004 Outfall during the month: On June 30, the recorded pH was 9.3. This was caused by Deer Park receiving CIWA water which had a high pH.

C. Wastewater Stripping

There were no violations of the 10 ppm standard during the month.

V. Reclaim System/Flare

Month

Permit Y-T-D*

Flare Use in Hours

1 Hr. 20 Min.

1 Hr. 20 Min.

*Permit year is 2/1 to 2/1.

VI. <u>Environmental Statistics</u>	Month	YTD
A. <u>Suspension Stripping</u>		
Daily Average (ppm)	108.2	62.2
Days Above Standard Limits	0	1
B. <u>Wastewater Stripping</u>	Month	Y-T-D
Daily Average (ppm)	0.36	1.94
Days Above Standard	0	7
C. <u>Reactor Openings</u>		
Number of Charges	1,692	9,812
Number of Reactors Sampled	17	135
Number of Above Standard Limits	0	3
Percent Above Standard Limits	0	2.2
Charges/Openings	1/1	1/1
D. <u>Total Reportable VCM Releases</u>		
Number of Releases	2	2
E. <u>Outfall 004</u>		
Number of Samples Above NPDES Permit 1		1
VII. <u>Total VCM Emissions from Stripping and Reactor Openings</u>		
A. <u>Suspension Resin Stripping</u>	Month	Y-T-D
EPA Permitted Emissions - lbs.	4,421	25,812
*Texas Permitted Emissions - lbs.	1,327	7,744
Actual VCM Emissions - lbs.	1,196	4,046
Over/(Under) - lbs. (Texas)	(131)	(3,698)
*Permitted based on 280 MM lb/yr. production by State of Texas (allowable residual @ 120 ppm).		
B. <u>Reactor Openings</u>		
Permitted VCM Emissions - lbs.	221	1,291
Actual VCM Emissions - lbs.	190	1,041
Over/(Under) - lbs. (Texas)	(31)	(250)
C. <u>Totals</u>		
EPA Permitted Emissions - lbs.	4,642	27,103
Texas Permitted Emissions - lbs.	1,548	9,014
Actual VCM Emissions - lbs.	1,386	5,087
Over/(Under) - lbs. (Texas)	(162)	(3,927)
% of Permitted Emissions (Texas)	89.5	56.4

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VIII. Injury Report

	Lost Time Cases		Lost Work Cases		Recordable Cases		First Aid Cases	
	MO.	YTD	MO.	YTD	MO.	YTD	MO.	YTD
Resin #3/4	0	0	0	0	0	0	1	8
Maintenance	0	0	0	0	0	0	0	2
Lab	0	0	0	0	0	0	0	0
LPS	0	0	0	0	0	0	1	1
Tech & Admin.	0	0	0	0	0	0	0	0
Total PVC	0	0	0	0	0	0	2	11

D. R. Muehlenbrock
D. R. Muehlenbrock

/bsf

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