

Interoffice Communication

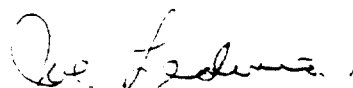
To J. A. DeBernardi
From J. C. Ledvina
Date June 5, 1981
Subject PROPOSED FUGITIVE EMISSION STANDARD

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Kiedue
cc. Vellis
SF Pffs
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I attended a hearing in Washington on June 2-3, where the proposed Refinery Fugitive Emission New Source Performance Standard was discussed. As I indicated previously, the Refinery NSPS contains some provisions which will eventually be incorporated in the final Chemicals (SOCMI) NSPS. The VCM Plant may be required to comply with the SOCMI fugitive standard.

Three of the issues discussed in the hearing should be brought to your attention:

1. Inaccessible valves are not totally exempted from monitoring, they must be monitored once a year.
2. Reporting requirements for delayed repair etc., will probably be reduced from quarterly reporting to annual reporting.
3. Safety valves must be leakless; i.e., emitting at a concentration below 200 ppm. Once the valve relieves, we have five days to restore it to a leakless condition. The VCM expansion project will comply with this provision by installing rupture disks under the safety valves. The question is, how will we replace the disk within five days as required by the standard. There were very strong comments against block valves under safety valves as a method of isolating the relief device for maintenance without taking a shutdown. Quotes were given from two insurance companies saying this practice (block valves under relief valves) was unsafe and could cause cancellation of insurance. Can we comply with the five day repair requirement in view of this safety issue?


J. C. Ledvina

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cc G. Bottoms
G. Fryar
M. Hayes
B. Raffle