

VCM Plant

Conoco Chemicals
Continental Oil Company
P.O. Box 605
Westlake, Louisiana 70669
(313) 491-5211

September 16, 1977

Mr. Howard G. Bergman
Director, Enforcement Division
Environmental Protection Agency, Region VI
First International Building
1201 Elm Street
Dallas, TX 75270

Dear Mr. Bergman:

A waiver of compliance from 40CFR Part 61, Subpart F, was granted our EDC/VCM Plant located in Westlake, Louisiana on July 5, 1977. One of the requirements stated in your letter of July 5 was that CONOCO will report the information outlined in Section 61.70 on a semiannual basis, beginning September 15, 1977. As Mr. G. L. Foshee, Chief Process Engineer - CONOCO VCM Plant, discussed with Mr. Gary Bernath of your office on July 13, 1977; we have no vent sources which were not included in the waiver of compliance. Therefore, it is our interpretation that the information requirements listed in Section 61.70 do not apply until the waiver period is over; and the initial compliance test has been conducted.

As reported in our letter of August 1, 1977, we have ordered the major equipment items for the Thermal Incineration System, the Oxy Vent Heater, H-312, and the Rupture Discs for Relief Valves in VC Service. We have also obtained a permit from the State of Louisiana for the Thermal Incineration System and hope to start construction before the January 1, 1978 date required by our waiver.

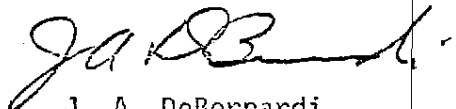
However, we are not going to be able to meet the equipment ordering date for the spare Wastewater Steam Stripper. We have been experiencing feed problems with the existing stripper, and had to modify the process design for the new system to alleviate this problem. These changes delayed the issue of the process design, and the mechanical design will not be at the point that equipment can be ordered on October 1, 1977. We estimate that equipment can be ordered by December 15, 1977. We continue to believe that the remaining dates on the schedule for this item will be met. That is, with the December 15 equipment order; we project that on site construction will still commence by April 1, 1978 and be completed by August 1, 1978. Therefore, we request that the equipment ordering requirement be changed to December 15, 1977.

VVC 000013064

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Please let us know if you have any objections to our interpretation of the semiannual report requirements, or the change in equipment ordering date for the Steam Stripper.

Sincerely,



J. A. DeBernardi
Plant Manager

is

CC:

J. F. Coerver, LACC

BCC:

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