CONOCO

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Conoco Chemicals
Continental Oil Company
P.O. Box 91, New Highway 25
Aberdeen, Mississippi 39730

RBM

July 5, 1978

WE DO NOT ALTER DATA. WE HAVE PROVEN MANY TIMES THAT WHEN OPERATING CONDITIONS ARE STRICTLY FOLLOWED AND WHEN ALL MECHANICAL EQUIPMENT IS IN PROPER OPERATING CONDITION THAT SLURRY LEVELS ARE 300-350 ppm. WE HAVE ALSO SHOWN WHEN EITHER OF THE ABOVE IS NOT TRUE THEN SLURRY LEVELS CAN BE VERY, VERY HIGH. WE SHOULD BE ABLE TO DEMONSTRATE <400 ppm IS A CONTROLLE[D] TEST, AS WE ALWAYS HAVE IN THE PAST.

United States Environmental Protection Agency
Suite 300
1421 Peachtree Street
Atlanta, Georgia 30309

Attention: Mr. Thommie A. Gibbs, Chief
Air Engineering Branch

Dear Sir:

This letter is written to describe our current situation relative to compliance with the National Emission Standards for Hazardous Air Pollutants, Standard for Vinyl Chloride [40 CFR, Chapter 1, Subchapter C, Part 61, pages 46560 - 46573].

Region IV of the Environmental Protection Agency granted our plant a waiver on March 30, 1977 (Mr. Jack E. Ravan to Mr. G. G. Draper, letter dated March 30, 1977). The letter listed the timetables the Plant was to meet to achieve compliance with the various parts of the Emission Standard. Described below are each of the areas indicated within Mr. Raven's letter and our current position relative to compliance for each area.

I. 61.64 [a] (1) - Reactor Exhaust Gases

All reactors within the plant meet the compliance requirement. Periodic reactor vents, required for control, are not emitted to the atmosphere. Instead, these vents are routed to monomer holding containers. The subsequent venting from the holding containers is routed through a refrigeration system and is then incinerated with the final vent to atmosphere being less than 10 ppm, as is required.

II. 61.64 [a] (2) - Reactor Opening Loss

Compliance is being achieved by use of specific operating conditions on the reactor vessels. Our plant strips the PVC slurry within the reactor vessels. The vessels are not opened until a slurry concentration level of less than 400 ppm is achieved.

Conditions employed at the end of the reactor stripping operation result in an extended steam purge of the vapor space above the slurry. Calculations show the VCM concentration of this vapor space to be sufficiently reduced to meet the reactor opening loss compliance requirement.

Gary — Doug — I hope you have altered our data in some way to get this average value below 400ppm. Keep these guys away from the lab records. RBM