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CERTIFIED MAIL #399 530 988
RETURN RECEIPT REQUESTED

September 12, 1985

VISTA

Mr. Robert H. Shemwell
Clerk
United States District Court
Western District of Louisiana
Shreveport, LA

Re: United States v. Conoco Inc.
Civil Action No. 83-2518

Dear Sir:

Enclosed is a copy of the letter transmitting to the United States Environmental Protection Agency the information required by the Consent Decree entered in the subject case. Submittal of this information satisfies Section III.A. of the Decree. Please enter the copy of the letter in the file for this case.

Thank you for your attention to this matter.

Sincerely,



R. A. Conrad
Plant Manager
Vista VCM Plant

br
cc(w/encl.):
J. Berry St. John, Jr.
Robert Brager
F. Henry Habicht, II
David A. Titman
Courtney M. Price
Ken Spears
Peter L. de la Cruz

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September 12, 1985

VISTA

Director, Air & Waste Mgt. Division
United States Environmental Protection Agency
Region VI
1201 Elm Street
Dallas, TX 75270

Dear Sir:

This letter and the attached material is being submitted by Conoco Inc. and Vista Chemical Company in full satisfaction of Section III.A. of the Consent Decree entered with the United States District Court for the Western District of Louisiana on August 19, 1985, in Civil Action No. 83-2518.

All of the pages in this information package which are stamped "confidential" are claimed confidential in their entirety pursuant to the provisions of 40 CFR Part 2. It is our understanding the EPA will protect this information as confidential and will not divulge it to any other party.

The information requested lends itself readily to tabular form; therefore, please note that responses have been combined in several tables. Information requested in Section III.A.1. is provided in Tables I and II. Table I identifies the number of bypass incidents by their respective nature and cause. Table II classifies each bypass incident "by category, according to the cause of the incident."

Information requested in Section III.A.2. (a) of the Consent Decree is provided in Tables II and III. Table II identifies each "bypass incident by the date of occurrence, time duration, ... and the applicable category ..., which properly describes the nature and cause of the bypass." Tables II and III together identify each "bypass incident by... description of the category of affected equipment from which exhaust gas(es) were released uncontrolled." Note that Table III does not include any affected equipment which would not be expected to be vented during normal everyday operation. For example, equipment that is vented in

CWH 000006087

Page 2

preparation for a plant turnaround during which production is halted is not listed as affected equipment.

Information requested in Section III.A.2.(b) is provided in Drawings VCM-1,2, and 3 as well as in the written descriptions accompanying these drawings.

Sincerely,



R. A. Conrad
Plant Manager
Vista VCM Plant

br
cc(w/o encl.):

R. M. McQuade

Office of the Clerk
United States District Court
Western District of Louisiana

cc(w/encl.):

J. Berry St. John, Jr.
Robert Brager
F. Henry Habicht, II
David A. Titman
Courtney M. Price
Ken Spears
Peter L. de la Cruz

bcc(w/encl.):
RTF, RAC, WPS, SCR, MWC, JCL, WLM, TGG, GEH

bcc(w/encl.):
ESW, JHN, GJF

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TABLE I

Incinerator Bypass Nature and Cause Summary for the Period From
May 1, 1983 through March 13, 1985

<u>Nature and Cause Category</u>	<u>Total Number of Bypasses Per Category</u>			
	<u>Partial Bypass</u>	<u>Automatic Shutdown</u>		
		<u>Flame Failure</u>	<u>Low Combustion Air Flow</u>	<u>Other</u>
I. Excessive Vent Flow from Main Plant				
A. Routine Vents				
1. Vinyl Product Caustic Dryer (1)	1			
2. Vinyl Vent Recovery Unit (2)	3	1		1
3. Oxychlorination Purge Gas Dryer (3)	1			
4. Flake Caustic Dryer (4)	1			1
5. Caustic Melt Blowdown Drum (5)				1
6. EDC-Caustic Decanter T-102 (6)	1			
7. Direct Chlorination Reactor Startup (7)	1			
8. Miscellaneous Equipment Clearing for Maintenance (8)	2	4	1	3
9. Main Plant Startup and Inventory (9)	2	1		
B. Non-routine or Emergency Vents				
1. Light Ends Storage Tank (10)	1			
2. Vinyl Column (11)	5	3		2
3. Direct Chlorination Reactor				
a. Impurities in Reactor Feedstock (12)				
1) Ethylene	4	3		
2) Chlorine	5			2
4. HCl Column (24)	1			
C. Unknown Source	3	3		

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(All footnotes appear on pages following this table).

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Total Number of Bypasses Per Category

<u>Nature and Cause Category</u>	<u>Partial Bypass</u>	<u>Automatic Shutdown</u>		
		<u>Flame Failure</u>	<u>Low Combustion Air Flow</u>	<u>Other</u>
II. Instrument Malfunction				
A. Combustion Air Control (13)			1	1
B. Instrument Panel Power Supply (14)				1
C. Combustion Air Automatic Shutoff (15)			1	
D. Flame Arrestor Level Control (16)	1			1
E. Flame Scanner (17)		1		
F. Valve Positioner (18)		1		
G. HCl Absorber Quench Vapor Inlet Temperature (19)				1
III. Mechanical Malfunction				
A. Incinerator Burner	4			1
B. Tank Farm Vent Blower	4 (20)			
C. Incinerator Firebox				1
IV. Steam Outage			1	1
V. Electrical Power Outage	2 (21)			2
VI. Liquid Byproduct Feed Interruption		1		
VII. Operator Inattention	1			

(All footnotes appear on the pages following this table).

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Nature and Cause Category	Total Number of Bypasses Per Category					
	Automatic Shutdown					Other
	Partial Bypass	Flame Failure	Combustion Air Flow	Low		
VIII. Miscellaneous						
A. Tripout of Steam Turbine Driving Combustion Air Blower (22)					2	
B. Cause Unknown (23)		1				

CWH 000006091

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Notes for Table I

- (1) The vinyl product caustic dryer is used to remove moisture from product being transferred from storage to railcars or ship.
- (2) The vinyl vent recovery unit recovers vinyl product from railcar and ship vents by condensing vinyl vapors. Once condensed, vinyl is recovered and the remainder of the vent stream is incinerated.
- (3) The oxychlorination purge gas dryer removes moisture from the oxychlorination purge stream before the stream enters the direct chlorination reactor.
- (4) The flake caustic dryer is used to remove moisture from vinyl product being transferred from the processing unit to storage.
- (5) Caustic melt from the flake caustic dryers is routinely transferred to the caustic melt blowdown drum where entrained and/or dissolved vinyl is vaporized and vented to the incinerator.
- (6) Crude ethylene dichloride is washed with caustic and then phase separated in EDC-Caustic Decanter T-102.
- (7) Ethylene dichloride is produced by direct chlorination of ethylene in the Direct Chlorination Reactor.
- (8) During turnarounds and maintenance shutdowns equipment is cleared with steam and nitrogen prior to opening for entry.
- (9) During main plant startup equipment is purged of all oxygen and then inventoried.
- (10) Pressure in the Light Ends Storage Tank is normally automatically controlled by venting excess pressure to the incinerators. Failure of the automatic controller and subsequent overpressure of the tank necessitated emergency venting to the incinerator.
- (11) The bottoms of the HCl Column are fed to the Vinyl Column where vinyl chloride product and recycled ethylene dichloride are separated. Occasionally the HCl column goes "sour" which results in HCl vapors in the top of the Vinyl Column, necessitating emergency venting of the Vinyl Column condensers to the incinerator.

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- (12) Impurities in the Direct Chlorination Reactor feedstock and/or operational upsets of the feedstock supplier result in abnormally high vent rates.
- (13) Incinerator combustion air control is used to maintain sufficient excess oxygen to ensure complete combustion.
- (14) The incinerator instrument panel power supply provides regulated power to all control and indication instrumentation.
- (15) When an automatic incinerator shutdown occurs a safety shutoff valve on the combustion air automatically closes, preventing addition of air to the firebox.
- (16) Liquid seal flame arrestors are used to prevent flash back from the incinerator firebox into the exhaust gas headers.
- (17) Incinerator firebox flame scanners are used to detect the firebox flame.
- (18) Valve positioners are used on the exhaust gas header pressure control valves to ensure correct valve position for a given controller output signal.
- (19) HCl absorber quench vapor inlet temperature is monitored and will initiate an automatic incinerator shutdown if safe operating temperature is exceeded.
- (20) Mechanical malfunction of the tank farm vent blower results in bypassing of the tank farm vent only, not the direct chlorination and wet vent headers.
- (21) The incinerator did not shutdown because power was interrupted for less than 3 seconds. However power to the tank farm vent blower and to the main plant was interrupted on 2-7-84 and 6-1-84 causing partial bypasses.
- (22) Incinerator combustion air is supplied by forced draft blowers driven by either steam turbine or electric motor. Turbine tripouts were caused by low lube oil pressure resulting from plugged filter elements.
- (23) The exact cause of the incinerator bypass that occurred on 12-31-84 at 0430 is unknown. Prior to its occurrence the vent header pressure decreased followed by a flame failure indication.

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- (24) A mixture of HCl, vinyl chloride, and ethylene dichloride is fed to the HCl Column where the HCl is separated from the vinyl chloride and ethylene dichloride.

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Table II

Incinerator Bypasses
Reported During the Period from
May 1, 1983 through March 13, 1985

Date	Time(3)	Nature & Cause Category	Partial Bypass	Automatic Shutdown			Vent Header(s) Bypassed		
				Flame Failure	Low Combustion Air Flow	Other	Wet	Dry	Tank Farm
05-13-83	0900-0945	I.A.8.				x	x	x	x
05-14-83	2200-2204	I.B.3.a.2)	x				x	x	x
05-15-83	0010-0015	I.B.3.a.2)	x					x	
05-21-83	1645-1650	I.C.	x				x		x
05-25-83	0700-0730	I.A.8.				x	x	x	x
06-06-83	1800-1820	I.B.3.a.2)	x					x	
06-10-83	1000-1005	I.B.3.a.2)				x	x	x	x
06-10-83	1555-1600	I.A.8.				x	x	x	x
06-18-83	1100 -								
06-21-83	1400 (2)	III.B.	x						x
06-22-83	2030-2200	I.A.4.				x	x	x	x
07-08-83	0100-1000(2)	III.B.	x						x
08-01-83	2045-2130	I.A.8.			x		x	x	x
08-04-83	1015-1030	III.A.	x				x	x	x
08-10-83	1700-1715	I.A.5.				x	x	x	x
08-24-83	1400-1415	I.B.3.a.2)				x	x	x	x
08-28-83	0430-0440	I.B.2.				x	x	x	x
09-02-83	1530-1540	I.A.2.				x	x	x	x
10-13-83	1715-1717(1)	I.B.3.a.1)	x					x	
11-01-83	2230-2235	I.A.7.	x				x	x	x
11-05-83	1100-1105	II.A.				x	x	x	x
11-14-83	1545-1625	I.B.3.a.1)		x			x	x	x
11-15-83	0800-0805	II.B.				x	x	x	x
11-30-83	0145-0215	I.B.2.		x			x	x	x
12-15-83	0415-0425	II.C.			x		x	x	x
12-21-83	0400-0410	VIII.A.			x		x	x	x
12-23-83	0535-0550	VIII.A.			x		x	x	x
12-23-83	0630-0730	II.D.				x	x	x	x
12-25-83	1300-1530	IV.			x		x	x	x
01-12-84	2000-2005	I.B.2.	x				x	x	x
01-26-84	1030-1032	I.C.		x			x	x	x
01-27-84	1820-1830	I.C.		x			x	x	x
01-30-84	1000-1002	I.A.1.	x					x	
02-05-84	0900-1115	V.				x	x	x	x
02-05-84	2010-								
02-06-84	0100	III.A.				x	x	x	x
02-07-84	1630-1705	V.	x						x
	(1,2)								
02-09-84	1900-1905	I.A.9.	x				x		x

(All footnotes appear on last page of this table).

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Date	Time(3)	Nature & Cause Category	Partial Bypass	Automatic Shutdown			Vent Header(s) Bypassed		Tank Farm
				Flame Failure	Low Combustion Air Flow	Other	Wet	Dry	
02-10-84	0815-0940 (5 mins.)	I.C.	x					x	
02-11-84	1251-1545	I.B.4.	x				x	x	x
02-13-84	0225-0300	I.B.2.	x				x	x	x
02-13-84	2315-2325	IV.				x	x	x	x
02-14-84	0740-1215	III.C.				x	x	x	x
02-14-84	1747-1811	I.B.3.a.1)	x				x	x	x
02-17-84	0040-0043	I.A.8.	x				x		x
02-19-84	0030-0128	I.B.2.		x			x	x	x
02-22-84	1730-1732	I.A.2.	x					x	
03-08-84	1830-1832	I.C.	x					x	
03-09-84	1600-1610	I.A.8.		x			x	x	x
03-30-84	1110-1115	I.B.2.		x			x	x	x
04-02-84	2200-2202	I.B.1.	x				x	x	x
04-05-84	1030-1045	I.A.9.	x					x	
04-06-84	1430-2232 (23 mins.)	III.A	x				x	x	x
04-07-84	1410-1415	III.A.	x				x		x
04-11-84	1905-1912	I.A.8.	x					x	
04-22-84	0300-0302	I.B.3.a.2)	x					x	
04-25-84	1430-1455	I.B.3.a.2)	x					x	
05-07-84	2000-								
05-11-84	1515(2)	III.B.	x						x
05-11-84	0720-0745	I.B.3.a.1)	x				x	x	x
05-28-84	0750-0754	II.F.		x			x	x	x
05-30-84	0820-0821	I.A.3.	x					x	
05-31-84	0930-1053 (5 mins.)	V.				x	x	x	x
06-01-84	1310-1311	V.	x				x	x	x
06-01-84	1845-1925	I.B.2.	x				x	x	x
06-20-84	1250-1300	I.C.		x			x	x	x
06-27-84	1650-1700	II.E.		x			x	x	x
06-28-84	1200-1215	I.B.2.				x	x	x	x
06-28-84	1630-1650	I.B.2.	x				x	x	x
06-28-84	1845-1925	I.B.2.	x				x	x	x
07-06-84	1000-1058	I.A.2.	x					x	
07-19-84	1530-1622	I.A.8.		x			x	x	x
07-19-84	1625-1630	I.A.8.		x			x	x	x
07-20-84	0200-0205(1)	I.A.8.		x			x	x	x
07-22-84	1350-1400(1)	I.A.9.		x			x	x	x
09-04-84	0415-0730(2)	III.B.	x						x
09-05-84	1210-1255	VI.		x			x	x	x
09-10-84	1100 (5 secs.)	I.A.2.	x				x		x
09-20-84	1300-1301	I.A.4.	x				x		x
09-21-84	1630-1645	III.A.	x				x	x	x

(All footnotes appear on the last page of this table).

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Date	Time(3)	Nature & Cause Category	Partial Bypass	Automatic Shutdown			Vent Header(s) Bypassed		
				Flame Failure	Low		Wet	Dry	Tank Farm
					Combustion Air Flow	Other			
09-28-84	1550	VII.	x					x	
	1815-0940 (1)								
10-01-84	1510-1520	I.A.2.		x			x	x	x
10-25-84	1535-1546	II.A.			x		x	x	x
12-03-84	1455	I.A.6.	x				x		x
	(5 secs.)(1)								
12-12-84	0905-0912	II.C.				x	x	x	x
12-13-84	0250-0340	I.B.3.a.1)		x			x		x
12-14-84	0115-0135	I.B.3.a.1)	x					x	
12-24-84	0735-0736	II.D.	x				x	x	x
12-31-84	0430-0440	VIII.B.		x			x	x	x
01-21-85	1800-1802	I.B.3.a.1.)		x			x	x	x

Notes:

- (1) Three hour time-weighted average is estimated to be less than 10 ppm.
- (2) Only the Tank Farm Vent bypassed the incinerator; therefore, the magnitude of the vent flow and vinyl chloride concentration were small. See Bypass Mechanism for the Tank Farm Vent attached.
- (3) When the bypass spanned two or more consecutive days, the starting date and time are given on the first line and the ending date and time on the next. When the bypass was intermittent, the time period over which the bypass occurred is given followed by the total time during which the incinerator was actually bypassed in parenthesis, i.e., 1815-0940 (5 min.). When the duration of the bypass was less than 1 minute, only the starting time is given followed by the duration in parenthesis, i.e., 1455 (5 secs.).

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Table III

Vent Header Affected Equipment Sources

I. Wet Vent Header

A. Continuous Sources

1. Light Ends Column Overhead Accumulator (S-102) - collects overhead product from the Light Ends Column
2. EDC-Caustic Decanter (T-102) - crude ethylene dichloride (EDC) and caustic are phase separated in this vessel
3. EDC-Acid Decanter (T-103A) - crude EDC and acid are phase separated in this vessel
4. Steam Stripper Aqueous Holding Tank (T-110) - contains feed for the Steam Stripper
5. Tank Farm Vent System - collects vents from storage tanks
6. Light Ends Storage Tank (T-402) - stores overhead product from the Light Ends Column
7. Natural Gas Dryers (S-149 A/B) - remove moisture from natural gas entering the Direct Chlorination Reactor
8. CPS Collection Drum (T-512) - receives and phase separates (organic and aqueous phases) liquid from the CPS Underground Collection Drum (T-514)
9. CPS Underground Collection Drum (T-514) - collects and adjusts the pH of drains from the Closed Process Sewer (CPS) system

B. Intermittent Sources

1. Flake Caustic Dryers (S-207 A/B) - remove moisture from product being transferred to storage
2. Vinyl Column Condensers (H-207 A/B) - condense overhead product from the Vinyl Column

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3. Vinyl Product Caustic Dryer (S-401) - removes moisture from product being transferred from storage to railcar or ship
4. Oxychlorination Purge Gas Dryers (S-322 A/B) - remove moisture from oxychlorination purge gas before the gas enters the Direct Chlorination Reactor
5. Caustic Melt Blowdown Drum (S-108) - collects caustic melt from the Flake Caustic Dryers

II. Dry (or Direct Chlorination) Vent Header

A. Continuous Sources

1. Direct Chlorination Reactor Crude EDC Tank (T-101) - receives crude EDC product from the Direct Chlorination Reactor
2. Heavy Ends Column Overhead Accumulator (S-103) - collects overhead product from the Heavy Ends Column
3. EDC Tar Still Column (C-104) - distillation column for removing EDC from heavy ends byproduct
4. VCM Tar Still Column (C-204) - distillation column for removing EDC from heavy ends byproduct
5. MeCl Unit CO₂ Stripper (W-112) - Removes CO₂ and other noncondensables from MeCl product²
6. MeCl Chiller (X-7) - Recovers MeCl product from the desuperheater vent

B. Intermittent Source

1. Vinyl Vent Recovery Unit - recovers vinyl from railcar and ship vents during loading

III. Tank Farm Vent Header

A. Continuous Sources

1. Tars Storage Tanks (T-405 & T-452) - store heavy ends byproduct

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2. Slops Tank (T-460) - stores off-specification intermediate products
3. Pure EDC Storage Tank (T-451) - stores pure ethylene dichloride product
4. Dry Crude EDC Storage Tank (T-450) - stores crude EDC from the Direct Chlorination Reactor Crude EDC Tank and/or recycle EDC from the bottom of the Vinyl Column
5. Wet EDC Storage Tank (T-453) - stores wet EDC from the Wash System

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Bypass Mechanism for the Direct Chlorination and Wet Vents

Overview of the Bypass Mechanism

See Drawing VCM-1

The Direct Chlorination or Dry (DC) Vents and the Wet Vents normally flow from the main plant through individual liquid knockout pots to the vent gas incinerator. However, under certain conditions a portion or all of either the wet or DC vents can bypass the incinerators and flow to the atmosphere via the Vent Scrubber. Gases bypassing the incinerator first pass through a pressure control valve (PCV) which is located in each header's bypass line to the Vent Scrubber. These pressure control valves can only be opened by certain controllers under specific conditions, all of which will be discussed in more detail in the following section.

Detail Description of the Bypass Mechanism

See Drawing VCM-2

Under upset conditions the Direct Chlorination or Dry (DC) Vents and Wet Vents bypass the incinerator by flowing through the Vent Scrubber, C-500, to the vent stack and subsequently the atmosphere via vent header pressure control valves PCV-901 and PCV-902, respectively. (See Drawing VCM-2 for further details). A bypass of the vent incinerators is classified as either a partial or a total bypass. A partial bypass of the DC and/or Wet Vent occurs when PCV-901 and/or PCV-902, respectively, are opened by one of several controllers and the incinerator stays on-line. A total bypass of the DC Vents and Wet Vents occurs when PCV-901 and PCV-902 open after the on-line incinerator shuts down. The burner management system of each incinerator contains interlocks which can automatically shut down the incinerator. The conditions which activate an incinerator shutdown are:

- 1) High incinerator firebox temperature.
- 2) Low steam drum level.
- 3) High HCl absorber temperature.
- 4) Low primary combustion air flow rate.

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VCM
Recovery
System
Vent

Dry Vents

Tank Farm
Vent

Wet Vents

Dry Vent
KO Pot

Wet Vent
KO Pot

PCV

PCV

Incinerators

Incinerator
Vent Stack

Main Plant
Vent Stack

Vent Scrubber
C-500

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DRAWING VCM-1
SIMPLIFIED DIAGRAM OF WET AND DC VENT
HEADER BYPASS SYSTEM

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- 5) Low standby air flow rate.
- 6) Loss of flame.
- 7) Mechanical failure of the flame scanners.
- 8) Power failure of more than 3 seconds.

Whenever an incinerator automatically shuts down, the DC Vent and Wet Vent safety shutoff valves (SSOV-905A and SSOV-906A for the primary incinerator train and SSOV-905B and SSOV-906B for the standby incinerator train) close automatically. These valves are located directly upstream of the incinerator trains Liquid Seal Flame Arrestor, S-911A for the primary train and S-911B for the standby train. In addition the safety shutoff valve on the line for the combined vent to each incinerator from the flame arrestors, SSOV-916A for S-911A and SSOV-916B for S-911B, close as part of the shutdown action. Closing the safety shutoff valves stops the flow of exhaust gas to the inoperative incinerator, and causes the pressure to increase in the vent headers. A bypass does not occur unless the pressure in the header(s) become(s) high enough for PRC-901 and/or PRC-902 to open their respective pressure control valves (PCV-901 and PCV-902).

There are two other items that can automatically close the safety shutoff valves; these are a low low level indication of the seal liquid on the flame arrestor and a high temperature in the flame arrestor. A total bypass will occur if the safety shutoff valves are closed for a sufficient length of time. One point to note is that an automatic incinerator shutdown does not necessarily take place due to either of these two items happening.

Each pressure control valve, PCV-901 and PCV-902, can be automatically opened by one dedicated or four shared controllers. The six controllers and their functions are listed below:

1) PRC-901 - DC Vent Header Pressure Controller

This controller is dedicated to PCV-901. It controls the pressure of the DC Vent Header.

2) PRC-902 - Wet Vent Header Pressure Controller

This controller is dedicated to PCV-902. It controls the pressure of the Wet Vent Header.

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3) TIC-906A - Primary Incinerator Firebox High Temperature Controller

This controller will open both PCV-901 and PCV-902 when the temperature in the Primary Incinerator Firebox exceeds the set point.

4) TIC-906B - Standby Incinerator Firebox High Temperature Controller

This controller will open both PCV-901 and PCV-902 when the temperature in the Standby Incinerator Firebox exceeds the set point.

5) PIC-982C - Primary Incinerator HCl Absorber Pressure Controller

This controller will open both PCV-901 and PCV-902 when the pressure in the Primary HCl Absorber exceeds the set point. The controller will function only when selected for control by Hand Switch, HS-982.

6) PIC-982D - Standby Incinerator HCl Absorber Pressure Controller

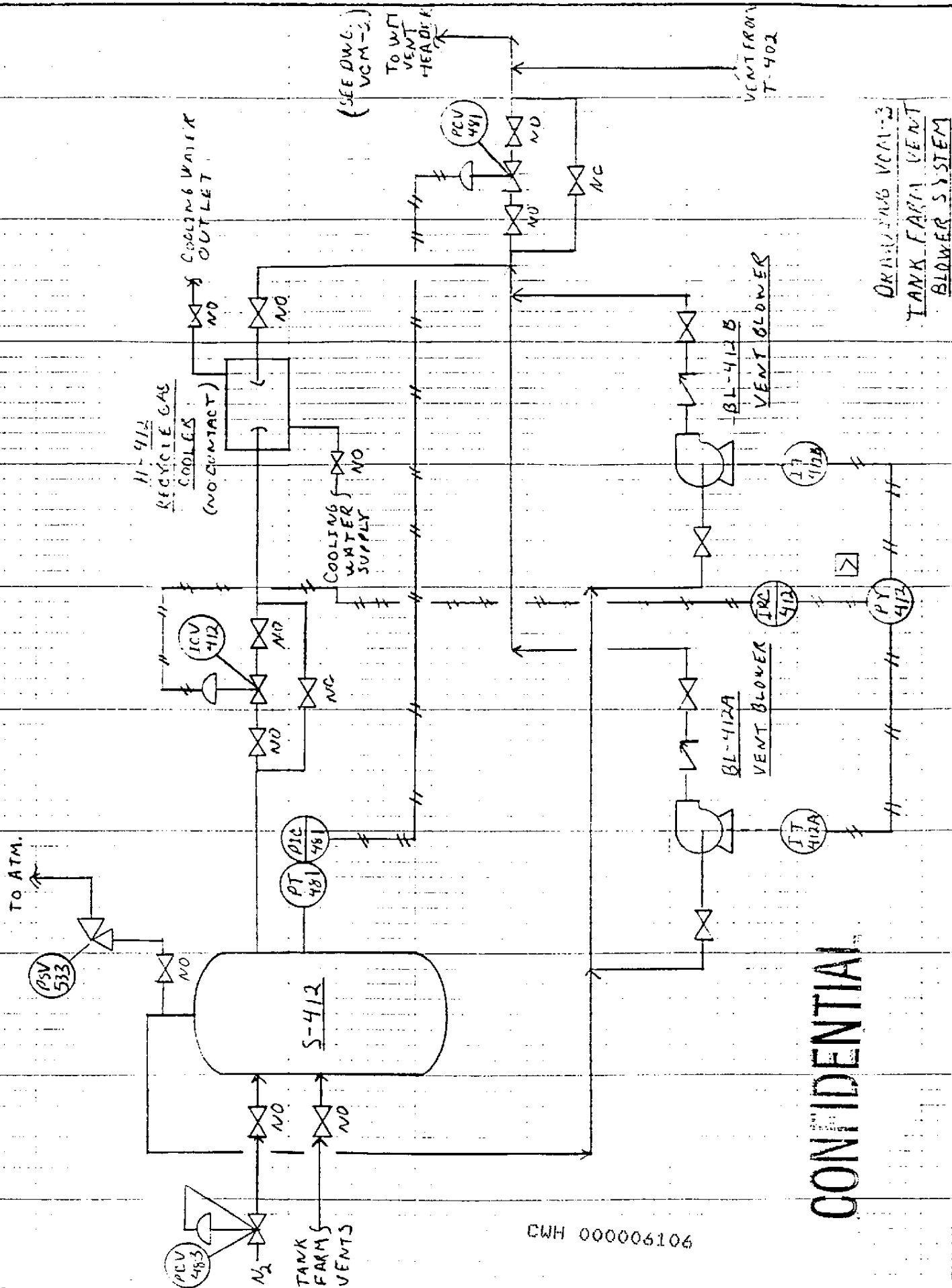
This controller will open both PCV-901 and PCV-902 when the pressure in the Standby HCl Absorber exceeds the set point. The controller will function only when selected for control by Hand Switch, HS-982.

Bypass Mechanism for the Tank Farm Vent

See Drawing VCM-2 and VCM-3

The Tank Farm Vent is bypassed around the incinerator through the Vent Scrubber, C-500, to the vent stack and subsequently the atmosphere whenever the Wet Vent header is bypassed (See Dwg. VCM-1 & 2). In addition the Tank Farm Vent will also bypass the incinerator when the operating Tank Farm Vent Blower fails. When both blowers are down the Tank Farm Vent gas is bypassed to the atmosphere through pressure safety valve PSV-533 located on top of the Tank Farm Vent Knock-out Pot, S-412 (See Dwg. VCM-3).

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Legend for Drawings VCM-1, 2, & 3

NO	Normally Open
NC	Normally Closed
RD	Rupture Disc
	Bypass Lines to C-500
DC	Direct Chlorination or Dry Vent

Instrumentation and Valve Identifications:

HS	Hand Switch
ICV	Current Control Valve
IRC	Current Recording Controller
IT	Current Transmitter
PCV	Pressure Control Valve
PIC	Pressure Indicating Controller
PRC	Pressure Recording Controller
PSV	Pressure Safety Valve
PT	Pressure Transmitter
PY	Signal Selector
SSOV	Safety Shutoff Valve
TIC	Temperature Indicating Controller

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