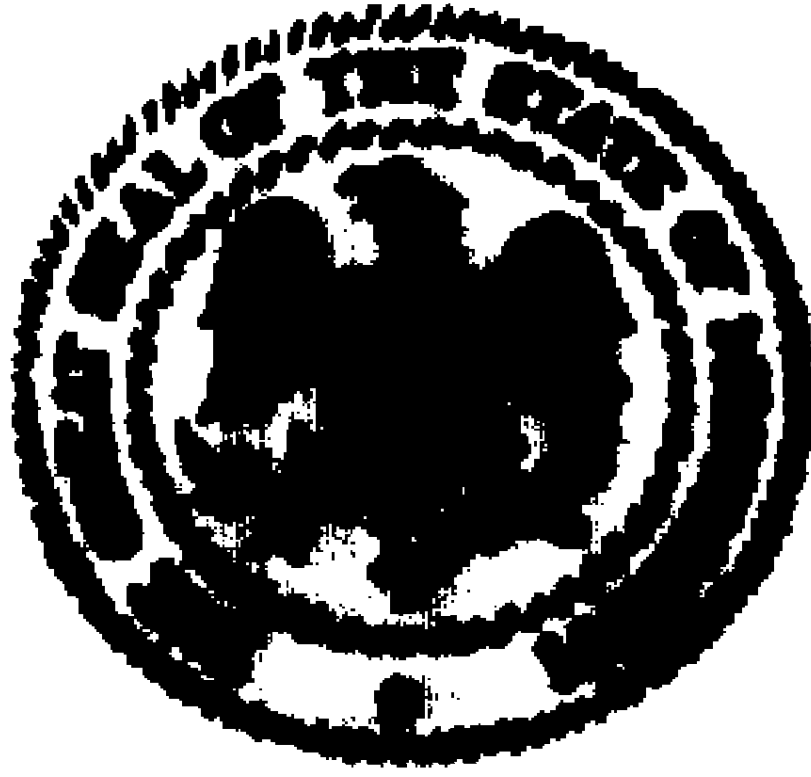
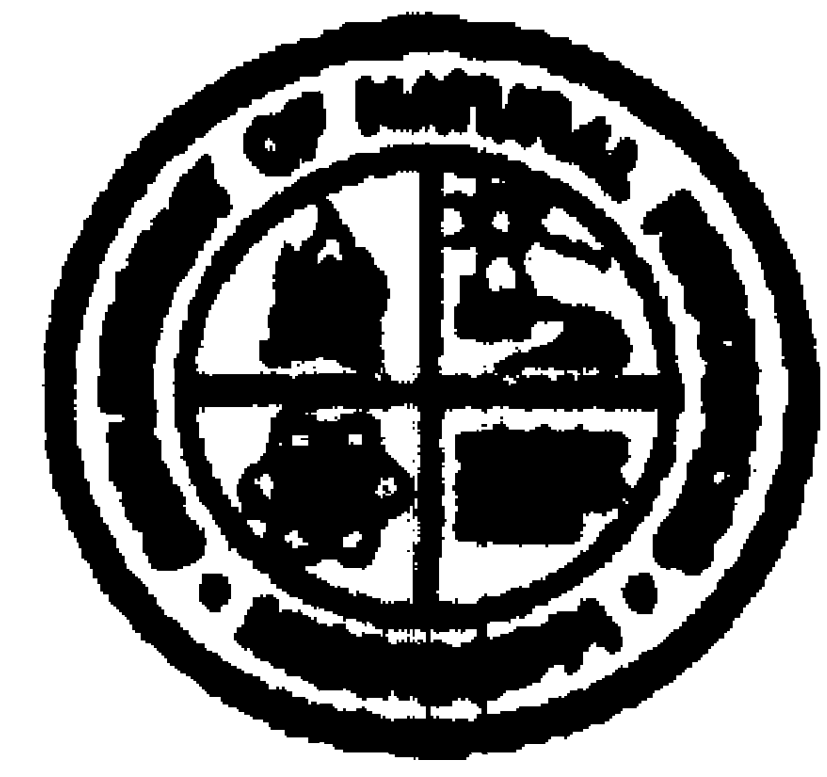




MISSISSIPPI DEPARTMENT OF NATURAL RESOURCES
Bureau of Pollution Control
P. O. Box 10386
Jackson, Mississippi 39209
(601) 961-5171



February 12, 1987

Mr. R. A. Frohreich
Director of Environmental Control
Vista Polmers, Inc.
P.O. Box 91
Aberdeen, Mississippi 39730

Dear Mr. Frohreich:

Enclosed is a copy of EPA's review of the two apparent vinyl chloride releases occurring on June 27, and August 8, 1986, for your review. As soon as you finish your review, we need to have another meeting to resolve the issue of the releases and any subsequent penalties.

If you have any questions, please let me know.

Sincerely,

Jerry B. Banks, P.E., Coordinator
North Air Emissions Section

JBB:sr
Enclosure

VAB.0001169986



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30388

FEB 4 1987

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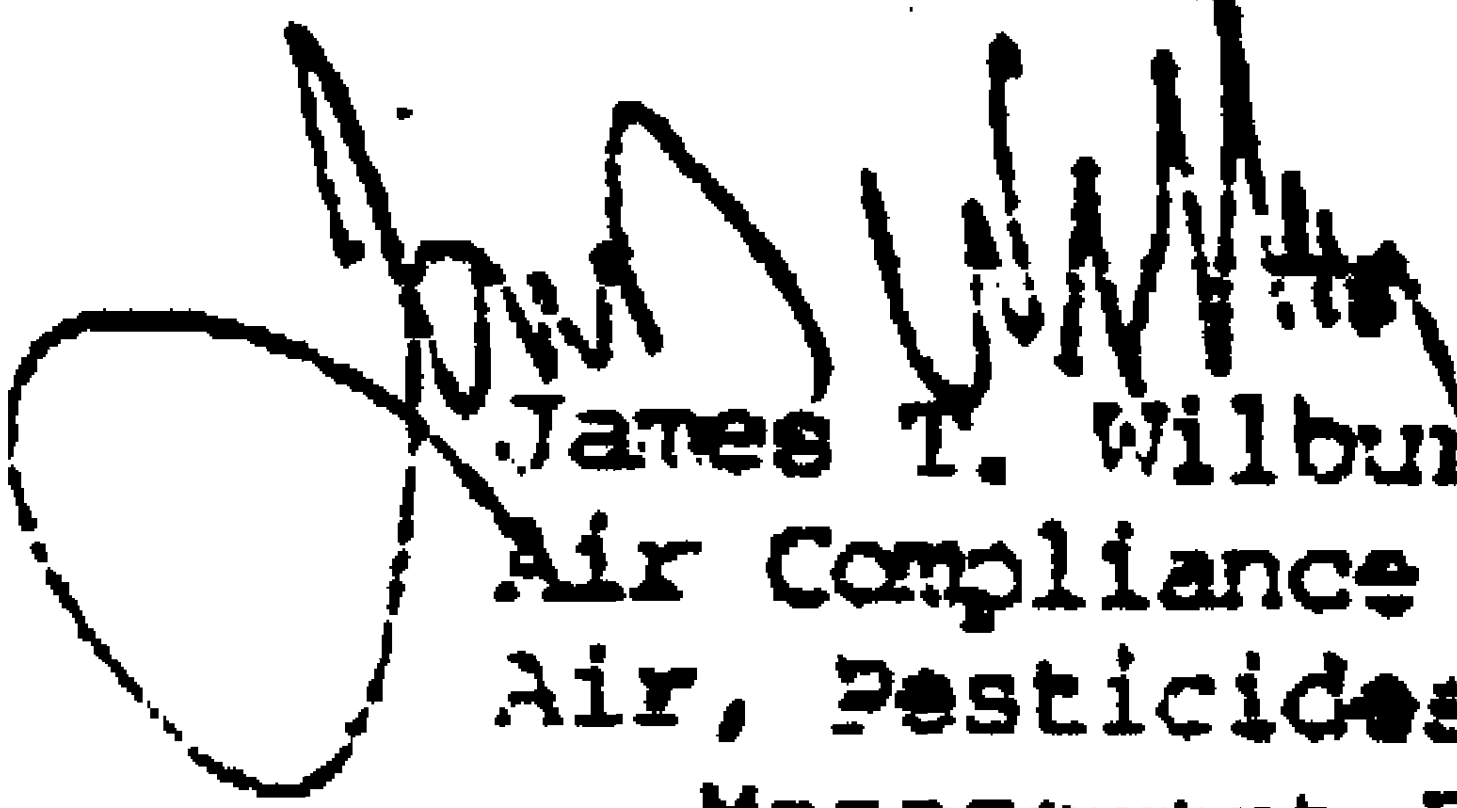
Mr. Dwight K. Wylie
Bureau of Pollution Control
Mississippi Department of Natural
Resources
Post Office Box 10385
Jackson, Mississippi 39205

Dear Mr. Wylie:

At your request, we have reviewed Vista Polymer's reports concerning two vinyl chloride releases occurring on June 27 and August 8, 1986. Our technical review of the information provided to EPA indicates that both vinyl chloride releases were violations of the National Emission Standards for Hazardous Air Pollutants as codified at 40 C.F.R. Part 61. Enclosed please find, an assessment of each vinyl chloride release, emphasizing the basis for EPA's decisions.

If we can provide any additional assistance, please do not hesitate to contact me or Dick DuBose at 404/347-2904.

Sincerely yours,


James T. Wilburn, Chief
Air Compliance Branch
Air, Pesticides and Toxics
Management Division

Enclosure

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TABLE I: Summary of Vinyl Chloride Releases

DATE	EMISSION POINT	CAUSE	CORRECTIVE ACTION	VIOLATION OF VC REGULATION
6/27/86	Relief valve discharge from fresh VCM receiver in reactor module #2.	• Malfunction of the level indicator of the VCM receiver caused overpressurization of the receiver.	• Replace faulty level indicator (d/p cell) • Install an interlocking switch for tank farm pump and high liquid level alarm • Weekly calibration of d/p LI with sight glass level gauge on the receiver • Install pressure indicator for the receiver and high press. shutdown for the pump.	yes, 40 CFR 61.65(a)
8/8/86	Reactor module #743	• Opening of suspending agent valve on reactor #742.	• Install an interlock on suspending agent valves.	yes, 40CFR 61.64(a)(1)(a)(3), 61.65(b)(5)

Table II: Reasons Justifying EPA's Decisions

June 27, 1986 release: Violation of 40 CFR 61.65(a), relief valve discharge.

The discharge can be prevented if one or more of the following actions were taken:

1. Routine calibration of d/p cell level indicator of VCM receiver.
2. Installation of interlocking switch for tank farm pump and high liquid level alarm.
3. Installation of pressure indicator or pressure alarm for VCM receiver in control room.
4. Alertness of panel operator to investigate the cause for high liquid level alarm of VCM receiver.

None of aforementioned precautions were taken.

The company's contention regarding the frequency of the relief valve discharges is no longer valid. EPA has decided to promulgate the revisions to the relief valve discharge standard which were proposed in January 9, 1985. (Sec. 51 FR 34904, September 30, 1986).

August 8, 1986 release: Violation of 40 CFR 61.64(a)(1), (a)(3) and/or 61.65(b)(5).

The VCM was released due to negligence and an error of the operator, and lack of written operating procedure for flushing suspending agent valve charge lines. Although the release is not considered as a relief valve discharge, it is neither considered a "leak". Vinyl chloride standard requires that the concentration of VC in all exhaust gases discharged to the atmosphere is not to exceed 10ppmV.