

CONOCO

Interoffice Communication

To B. I. Raffle - Houston
From M. G. Hayes - Westlake
Date -September 22, 1981
Subject VCM EXPANSION - PSD

RECEIVED 5/83/11/84
20 1982
1st Turnaround - May 82
2nd Turnaround - Feb 83
3rd Turnaround - 4/83
Mech Comp.
Bank agreement must start expansion

The VCM Expansion has been delayed for an indeterminate period. The conversion of the oxy process, however, will proceed. The basic question is how PSD permitting which has occurred will be affected. Attached are permitting determinations by EPA and the State.

1. The non-applicability determination states construction must commence within 18 months of August 7, 1980. Does conversion of the oxy process constitute commencement of construction for expansion purposes?
2. What constitutes breaks in construction should oxy conversion be considered commencement for PSD purposes? What time frame should be considered?
3. If not, is there a mechanism by which the non-applicability determination may be extended? If so, for how long?
4. In light of questions 1-3, please address how VCM expansion emissions should be considered when addressing contemporaneous emissions for permitting other projects.

probable construction start on expansion 11/85 could push this back to late '84

In preparing a response, please address any other areas you feel pertinent. If you have questions, please let me know.

M. G. Hayes

M. G. Hayes

mbr
Enclosure

cc + enc.: RTF JADeB GLF JCL JJH

SAL 000065214



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI

1201 ELM STREET

DALLAS, TEXAS 75270

December 19, 1980

CERTIFIED MAIL - RETURN RECEIPT REQUESTED 1356796

Mr. J. A. DeBernardi
Lake Charles VCM Plant Manager
Conoco Chemical Company
P. O. Box 605
Westlake, Louisiana 70669

Dear Mr. DeBernardi:

The application which you submitted on April 11, 1980, regarding the proposed modification of your VCM Plant located in Westlake, Calcasieu Parish, Louisiana, has been reviewed. The purpose of this letter is to inform you of the applicability of Prevention of Significant Deterioration (PSD) regulations to your proposed facility.

Based upon the information provided in your application and other correspondence, a PSD permit is not required under 40 CFR 52.21 as amended August 7, 1980, for the modification of your chemical process plant (PSD-LA-315) since (1) the modification was not subject to 40 CFR 52.21 as in effect on June 19, 1978, or under the partial stay of regulations published on February 5, 1980, and (2) your state preconstruction permit for the modification was obtained before August 7, 1980. This exemption from PSD review is contingent upon the following: (1) construction must be commenced within 18 months from August 7, 1980, or any earlier time required under the State Implementation Plan, (2) construction must not be discontinued for a period of 18 months or more, and (3) construction must be completed within a reasonable time. Your proposed emissions must also comply with all applicable New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAPS), and Louisiana State Implementation Plan (SIP) requirements.

If you have any questions concerning this matter, please contact Mr. Tom Diggs at (214) 767-1594.

Sincerely,

Jack Divita, Chief
Air Programs Branch

cc: Gus Von Bodungen, Chief
Air Quality Division
P. O. Box 44066
Baton Rouge, Louisiana 70804

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Handwritten signature/initials



FRANK A. ASHBY, JR.
SECRETARY

DEPARTMENT OF NATURAL RESOURCES
OFFICE OF ENVIRONMENTAL AFFAIRS
AIR QUALITY DIVISION

B. JIM PORTER
ASSISTANT SECRETARY

September 2, 1980

Conoco Chemical Company
P. O. Box 605
Westlake, Louisiana 70669.

Re: Modification of VCM Plant

Dear Sir:

This is to confirm that your permit request for the above referenced project at Conoco Chemicals Co., Lake Charles has been approved by the Louisiana Environmental Control Commission.

The submittal was approved on the basis of emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions to the types and quantities stated.

Date: March 25, 1980

Permit No. 1424

The attached 2 synopsis sheets and 3 data sheets establish the emission operating limitations which condition this certificate of approval. A new application must be submitted if the reported emissions are exceeded after operation begins.

The permit number cited above should be referenced in future correspondence regarding this subject.

Sincerely,

Handwritten signature: B. Jim Porter
B. Jim Porter
Assistant Secretary
Office of Environmental Affairs

BJP/AB/ebp

SAL 000065216

LOUISIANA ENVIRONMENTAL CONTROL COMMISSION

AIR QUALITY DIVISION

CONOCO CHEMICAL COMPANY

LAKE CHARLES VCM PLANT
Westlake (Calcasieu)

This permit request by Conoco Chemicals Company, a Division of Conoco Inc., is for permission to modify its existing vinyl chloride monomer production facility located at Westlake in Calcasieu Parish to expand its production capacity from 700 million pounds per year to one billion pounds per year on an annualized basis.

The expansion will be accomplished by adding a parallel train to the VCM system and debottlenecking existing equipment. The technology will be based on a well proven system.

Process emissions will be controlled by recovering hydrocarbon as much as practical and then by incineration to meet the NESHAP Standard of less than 10 ppm VCM in any vent gas.

Process incinerators will be controlled with wet scrubbers and the new heater will use LoNO_x burners.

Sulphur oxide emissions will be controlled by using fuel of less than 0.7% sulfur content.

The debottlenecking techniques employed will result in hydrocarbon and CO being reduced by 4609 and 1768 tons per year respectively.

Dispersion modeling supplied by the company indicates that ambient air quality standards will not be violated.

Table I shows the effect of this plant expansion on emissions of the facility as a whole.

NSPS does not apply to this facility.

Recommendations - - - - - (See Approval)

JHS/ys

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RECOMMENDATION:

Approval provided the following conditions are met.

- 1) The synopsis sheets and the attached data sheets establish the emission and operating limitations and are a part of the permit. The synopsis and data sheets are based on the application for approval of emissions dated February 5, 1980 with supplemental information submitted February 8, 1980. The application and supplemental information are also considered part of this permit by reference.
- 2) Construction must commence within two years after the date of approval.
- 3) The permittee will submit to the Technical Secretary semiannual reports of progress defining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect upon the emission rates or ambient air quality levels. Such reports shall continue to be submitted until such time as construction is certified as being complete.
- 4) Any emission testing performed for purposes of demonstrating compliance with the limitations set forth in Condition 1 shall be conducted in accordance with the methods described and referenced in Table 4 of the current Louisiana Air Control Commission Regulations.
- 5) The permittee shall, within 180 days after certifying the completion of construction prepare and submit to the Technical Secretary a report detailing the actual emission rates as compared to those limitations specified in Condition 1. The report shall also include, but not be limited to, malfunctions and upsets.

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LOUISIANA ENVIRONMENTAL CONTROL COMMISSION

Air Quality Data Sheet

Page 1

CONOCO CHEMICAL COMPANY

Westlake (Calcasieu)

Location of plant: 15 UTM 472.9 Km E 3346.5 Km N

Description of location: 2 miles north, intersection of Triesdale Road and
Old Spanish Trail

Estimated starting date of construction: April 1981 Estimated date operation will begin: November 1982

Type of Dispersion Calculations Used: CRSTER

EFFECTS OF AMBIENT AIR

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Air Control Commission Standard
NOx	Annual	4 ug/M ³	100
SO ₂	Ann/24/8	1/6/14 ug/M ³	80/365/1300
CO	8/1	3/6 ug/M ³	10000/40,000
Part	Annual/24	3/24 ug/M ³	75/260

NEW ☐ OR MODIFIED ☒ EMISSION SOURCESVCM Plant
(Type of Source)

Stack I.D. #	Description	Operating Rate (Maximum)	Operating Schedule		
			Hrs/Day	Days/Wk	Wks/Yr
IIA	Cracking Furnace	17607 CFM	24	7	49
IIB	Cracking Furnace	17607 CFM	24	7	49
IIC	Cracking Furnace	22375 CFM	24	7	48
IV-J	Dock EDC Tank	6 CFM	24	7	52
IV-K	Dock VCM Vent	316 CFM	3	1	52
V-A	Vent Incinerator	28817 CFM	24	7	52

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LOUISIANA ENVIRONMENTAL CONTROL COMMISSION

Air Quality Data Sheet - Page 2

Conoco Chemical Company (Lake Charles VCM Plant)
(Company's Name)

Westlake
(Nearest Town)

Calcasieu
(Parish)

EMISSIONS ARE LISTED USING THE UNITS LBS/HR

STACK ID	P E R M I T T E D E M I S S I O N S					Feet	FO	CFM
	TSP	SO ₂	NO _x	HC	CO	Height	Temperature	Flow Rate
I-A	1	1.1	12.9	0.2	1.0	120	550	17607
I-B	1	1.1	12.9	0.2	1.0	120	550	17607
I-C	7.3	17.3	6.7	1.5	2.0	120	550	22375
IV-J	-	-	-	11.9	-	35	85	6
IV-K	-	-	-	<0.1	-	148	75	316
V-A	21.6	0.6	35.7	3.7	0.7	75	125	28817

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