



NOV 18 1982

Interoffice Communication

To : File

From : V. E. Messick

Date : November 15, 1982

Subject : MEETING WITH MISSISSIPPI STATE AIR QUALITY AUTHORITIES

ROUTE TO:	_____
COPIES TO:	<i>John W. 11/23</i>
FILE:	<i>Aberdeen</i>

On November 11, 1982 Joe Ledvina, Dave Mahler and myself met with Dwight Wylie, Chief of the Air Division of the Bureau of Pollution Control, and Jerry Banks, North Air Emissions Section Coordinator, to discuss the Draft of the Air Permit dated October 18, 1982.

I stated that our major concerns are that: 1) the draft permit included regulation of vinyl chloride, 2) we do not now have a permit for vinyl chloride because it is governed by NESHAPS regulations, and 3) we do not understand why this is included in the permit since we must already comply with the NESHAPS regulations. Dwight answered that by state law all air contaminant sources must have a permit to operate regardless of federal regulations. I asked him if he meant that the state had to permit all air contaminant sources or if the state just wants to do this. He then firmly stated that they had to do it. At this point it was clear to me that he was very firm that there was no choice in the matter. Dave Mahler then asked what has changed between now and a year ago. Dwight asked Jerry if VCM was included in the previous permit. Jerry said that VCM was specifically excluded from the permit. Dwight stated that they must have made a mistake and that it should have been included.

Joe Ledvina expressed concern that we do not understand how the permit board operates and that we do not want this to become an emotional issue at a public hearing. Dwight then explained the permit board procedures. He said the permit board is made up of engineers and scientists, some of whom are the heads of DNR Departments. He said that permit review meetings take place on the second and fourth Tuesdays of each month. The permits to be renewed (from 30 to 200) are on the agenda. The companies are broken into major and minor sources. He said that the meetings are attended usually by other state agencies, occasionally other industrial people and rarely by the press. He said that only board members can approve or deny permits, but that they rely almost totally on the staff recommendations.

I then said that it was our understanding that the request for the study of VCM release prevention was for the benefit of convincing the permit board that we were taking necessary steps to insure compliance with NESHAPS. Dwight then replied that the intent of the letter requesting the study is to convince the State Air Division that Conoco is in compliance with the VCM standard. He said that it is to the benefit of Conoco that the

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state be convinced that we are taking measures to foresee possible problems and correct them. Joe Ledvina then asked what their responsibility was on the NESHAPS regulations to EPA and if there was any pressure on them from EPA. Dwight answered there has been no pressure so far. Joe then said that a plant might have 2 or 3 releases a year and think they are doing all right. The EPA will then take action 2 or 3 years later asking why these releases were not anticipated. Dwight then explained the differences between the way state enforcement and EPA enforcement operated. The main difference is that the same people in the state that are responsible for quality assurance are also responsible for seeking enforcement action. He then said that is why it is to the benefit of Conoco to convince the state that Conoco has a program that provides for a "minimal number of releases" and that "past problems have been corrected and minimized in the future."

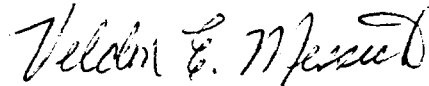
I asked if a permit application was necessary for the permit. Dwight said that in our case we could just sign a "short form".

We then reviewed the draft permit. The following items were discussed:

- 1- Page 4- boiler operations- The periods would be 3 years and nothing would be inserted after "emit". He said no monitoring would be required in all cases unless it is specified. He would make this clear in the revised draft permit.
- 2- We discussed having several different emission points for vinyl chloride in the permit. It was decided that a blanket statement that the vinyl area must comply with the NESHAPS regulations would be best to put in the permit. All other pages about vinyl chloride would be deleted.
- 3- We asked how the dryer rates were calculated and if the seven dryers could be combined. Jerry said that each one would have to be calculated individually. I then said our calculations showed 19 pounds instead of 10 pounds per dryer on that basis. He said that he would review the calculations and adjust the numbers if they were wrong.
- 4- We asked why the baghouses on the silos etc. were broken out separately. Jerry said it is an attempt to get an emissions inventory for PSD purposes. We pointed out that there were several typing errors and some silos were also left off. We also stated that we have a hydrocarbon tank farm and a plasticizer operation that were not included. Dwight said these would need to be included.
- 5- Jerry and Dave were to get together on the details on all of the above items.

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At the end of the meeting Dwight asked Jerry if there would be any sampling required to renew the permit. Jerry said that this would not be required in the vinyl area because of routine sampling with the NESHAPS standard. He also said that particulate tests would not be required because particulate tests in the past had showed that the numbers were so low that further testing would be an "exercise in futility".



Veldon E. Messick
Senior Process Engineer

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c: JF, RAF, JCL, DLM

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