PLAINTIFF'S
EXHIBIT
CEL-567

Celanese Chemical Company
TECHNICAL CENTER
Corpus Christi, Texas

To: As Listed * Ref: RHM-1535-72

From: R. H. Maurer RHM-1546-72 June 19, 1972

*Messrs. J. W. Corley
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Air Monitoring

As discussed in referenced letter, a report recommending a monitoring program for both ambient air and emission sources is presented.

In the ambient air and emission source analytical work, it is suggested that the approved method in the TACB Compliance Sampling Manual be used. As far as I know, TACB and EPA approved methods are synonymous. There may be instances where use of an alternate method is preferable. In this case, the alternate method should be checked against the TACB approved method to ascertain that satisfactory agreement exists (literature search and/or laboratory study). Through our Texas legal counsel, the Executive Secretary of the TACB should be contacted to obtain his approval of the alternate method. I would like to handle the request through this office.

No continuous instruments for emission source monitoring are specified in the TACB Compliance Sampling Manual. Mr. Roger R. Wallis, Program Chief of the Air Quality Evaluation Program advised me that the TACB staff hopes to add a section, within a year, which will list the instruments which the state plans to use in their air monitoring program.

Ambient Air

Particulates

Past high volume sampler data shows all Texas locations to be in compliance

Particulates - (Cont'd)

with Regulation I. Maintain Hi Vols in working condition so future checks of ambient particulates can be made following process changes which mignt change particulate emission rate.

Sulfur Compounds

Past data has shown all Texas locations to be in compliance with existing Regulation III. We foresee no problems with the new Regulation II. Future checks of ambient sulfur compounds should be made following process changes which might change the sulfur dioxide or hydrogen sulfide emission rate.

Hydrocarbons and Carbon Monoxide

Should continue to intermittently use the existing Ionics chromatographic units at each plant to obtain background information.

Nitrogen Oxides

Enough data should be obtained at each plant to determine the normal background concentration range. Some locations have done this, but it should be periodically updated.

Bay City is considering continuous measurement of nitrogen oxide in the ambient air. This is not recommended at other plant locations.

Oxidants

Enough data should be obtained at each plant to determine the normal background concentration range. Very limited data exists at this point.

Clear Lake is considering purchase of an instrument to give continuous measurement of oxidants. If Clear Lake obtains an instrument, it is recommended that other Company facilities wait until operating experience is obtained with the instrument before they would consider buying an instrument.

Emission Source

Particulates

No stack sampling of process emissions required at this time.

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Particulates - (Cont'd)

A study is being conducted to calculate the particulate content of flue gas produced from natural gas burning by analysis of the fuel gas. Pampa advised me that a method is not readily available for determining ash content of natural gas. I have written for some reference material which hopefully will describe how the EPA determined the emission factor which they published for natural gas burning.

Stack sampling of solid and liquid waste incinerators might be required to determine particulate content if these cannot be ascertained by analysis of the feed material. The new TACB Regulation I, which existing equipment must meet by the end of 1973, sets specific particulate emission limits. I would like to reiterate Pampa's suggestions; (1) If particulate source sampling needed consider sharing particulate sampling equipment in the Company, and (2) consider a particulate testing group for all locations.

Nitrogen Oxides

Bay City is considering procurement of an instrument for continuous measurement of some process nitrogen oxide emission streams. Use of an instrument at other Company locations is not recommended at this time. Roger Wallis advised me that the EPA is coming out with specifications (nothing published yet) recommending an Ultra-Violet type instrument for NO_x source monitoring. He thinks the instrument is like the DuPont 400 which costs about $12,000. Roger said that the EPA plans to recommend the chemiluminescent type instrument for ambient NO_x monitoring.

Each facility should determine the nitrogen oxide content of boiler flue gas, stationary internal combustion engine exhaust and process furnace flue gas. It is possible that by July 1, 1972 the TACB will set NO_x limits on certain size boiler exhaust gas and possible on stationary engine exhaust gas.

Sulfur Compounds

Clear Lake Acrylate Project might monitor sulfur dioxide content of incinerator stack. No other plans for monitoring sulfur compounds.

Hydrocarbon and Carbon Monoxide

No need for continuous source monitoring of these compounds at this time. Periodic checks are needed to maintain an accurate emission inventory of all plant emission streams.

R. H. Maurer

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RHM:nc

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FILE: Air Monitoring

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