

Interoffice Communication

To J. C. Ledvina - Houston Chemical
From P. D. Despres *FPM*
Date October 28, 1982
Subject Data for Vinyl
Span Checks

fpm;
The VCM Plant has never
monitor G.C.'s; the G.C.
checked and calibrated to
suggested and tested when
in 1976. The maintenance
to be time-consuming and
were seldom required. No
scheduled to be completed

vinyl chloride
electronics are
checks were
done in the plant
an check proved
adjustments
continued and

The span checking procedure is fairly time-consuming relative to the size of the instrument department at the VCM Plant. The weekly checks require 2.5% of the permanent instrument department's regular time. Four more days per week would require an additional 10% of the total time or 1000 man-hours per year.

The weekly mean adjustment of the G.C.'s has been 8.0% of the standard gas levels over the time period November 1976 to October 1982 (i.e. corrected 8 ppm on the analyzer reading for a 100 ppm standard). The standard deviation of the mean has been 16.1%.

A log is kept of the span checks. The data tabulated in the log includes: the date, the analyzer number, the concentration of the standard, the analyzer reading, a note on changes or calibration and the mechanics initials. The EPA commended the maintenance department on their recordkeeping in their last plant inspection. A copy of the log-book is attached.

Please do not hesitate to contact me (etn 640-5049) if you have any questions or comments.

Paul D. Despres
P. D. Despres
Process Engineer

br
cc: JAD-JWW-RB-JRH-MGH-MLA-DLD-PLF

VVC 000019853

Poll #3

To: DISTRIBUTION

From: S.W. Sommer

Date: March 16, 1982

Subject: Semi-Annual Report to the EPA - History of Reportable Incidents

Poll: gov

Attached is a summary of all reportable incidents included in the Semi-Annual Reports to the EPA since October, 1978. These incidents are listed by processing area. This table will be kept current and will be used to monitor the progress of the VCM Plant toward minimizing reportable vinyl chloride emissions.

If you have any questions, please call me at 5058.

Scott W. Sommer
SCOTT W. SOMMER
PROCESS ENGINEER

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JAD-JWW-RB-MLA-PLF-DLD-MGH

VVC 000019854

SEMI-ANNUAL REPORT TO THE EPA
REPORTABLE INCIDENTS

PERIOD	CIVIL (1)		INCIDENTS (2)		INNO. FROM		CIVIL (3)	
	REPORTED	UNREPORTED	TOTAL	VENT	DEL. VENT	INNO. FROM	VENT	DEL. VENT
0/78-2/79	28	5	43	11	21	1	9	3
1/79-4/79	21	6	27	25	23	1	8	3
1/79-3/80	33	4	37	27	29	4	10	3
1/80-4/80	24	15	39	17	16	0	9	14
1/80-3/81	39	0	39	8	9	0	1	1
1/81-4/81	39	0	39	8	10	0	1	1
1/81-2/82	38	0	38	12	14	0	1	1
TOTALS	282	20	312	109	122	6	51	51

(1) ONE REPORTABLE INCIDENT = 1 HOUR OF NON-COMPLIANCE.

(2) ONE REPORTABLE INCIDENT = 1 VENT BYPASS REGARDLESS OF DURATION.

(3) INCLUDES ONE (1) VIOLATION WITH C-101A.

(4) D.C. VENT REPORTED TO C-500 FROM JANUARY 1980 TO APRIL 1981.