



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI

DALLAS, TEXAS 75270

Rec'd 6/21/77

cc: Chomden
Jordan
Carter
Savoy
Breath
Taylor
Buins, C.A.

JUN 1977

Mr. W. R. Harris
Vice President and General Manager
PPG Industries
One Gateway Center
Pittsburgh, Pennsylvania 15222

Dear Mr. Harris:

Your letter dated December 20, 1976, and Mr. Wyche's letter of April 15, 1977, requesting a waiver of compliance from certain requirements of the national hazardous emission standard for vinyl chloride (40 CFR Part 61, Subpart F) for your EDC and VCM plants located in Lake Charles, Louisiana have been received and reviewed.

A waiver of compliance from 40 CFR Part 61, Subpart F, is hereby granted for your EDC and VCM plants located in Lake Charles, subject to the specifications and conditions delineated in the enclosure to this letter. All requirements of 40 CFR Part 61, including Subpart F, must be complied with in all respects during the period of October 21, 1976 to the termination date of the waiver unless specifically discussed in the enclosure to this letter.

The Enforcement Division Director, Region VI, Environmental Protection Agency, 1201 Elm Street, Dallas, Texas 75270, must be notified no later than 10 days after each increment of progress has been achieved.

Prior to the termination date of the waiver, you are required to test emissions, using an approved test method, from the sources listed in the enclosure to demonstrate compliance with the vinyl chloride standard. This office must be notified at least 30 days prior to such emission test so that we may have an opportunity to observe the test. The emission test shall be conducted and reported as required by 40 CFR Part 61.

For the remaining subject sources and vents which require testing, that are not delineated in the enclosure, i.e., those sources and vents which you consider to be in compliance with the standard, you are also required to conduct appropriate emission tests. The schedule for conducting these tests will be arranged through our Surveillance and Analysis Division. For this purpose, please notify Mr. Philip Schwindt of the Surveillance and Analysis Division within 10 days of the receipt of this letter so that a test date and pre-conference, if necessary, can be arranged. Mr. Schwindt may be contacted by telephone at (214) 749-7126.

Called &
letter to Mr. Wong
7/5/77, Mr. Wong has noted our call and will have Mr.
Schwindt return call next
week when he
return from vacation
JCC

SL 105266

Please be advised that, unless stated otherwise in the enclosed waiver, you are required to report, on a semiannual basis, all the information contained in Section 61.70, Semiannual report. Your first report will be due on September 15, 1977.

Any deviation from the conditions of this waiver, unless previously approved by the Director of the Enforcement Division, shall be grounds for the immediate termination of this waiver. In addition, a situation of imminent endangerment may warrant the immediate intervention of the Environmental Protection Agency.

Other requests you may have submitted, such as equipment and test method equivalencies, will be addressed under separate cover. Additionally, we intend to discuss and evaluate your leak detection program during an on site inspection, to be scheduled in the near future.

Should you have any questions concerning the substance of this waiver, you may contact Mr. Gary A. Bernath of my staff by letter to this office or by telephone at (214) 749-7675.

Sincerely,
ORIGINAL SIGNED BY
O. W. LIVELY, JR.
FOR
Howard G. Bergman
Director, Enforcement Division

Enclosure

cc: Louisiana Air Control Commission
P. O. Box 60630
New Orleans, Louisiana 70160

James E. Wyche III ✓
Coordinator Environmental Systems
PPG Industries
P. O. Box 1000
Lake Charles, Louisiana 70601

SL 105267

Waiver of Compliance
PPG Industries
Lake Charles, Louisiana
EDC and VCM Plants

<u>Applicable Regulation</u>	<u>Emission Point</u>	<u>Description</u>
7 §61.62(a), 61.65(b)(9)	EDc Plant	As described in PPG's waiver request, dated December 20, 1976
11, 12, 17 §61.63(a), 61.65(b)(3)(i) and (iv), 61.65(b)(5), 20 (6), (7), and (9)	VCM Plant	As described in PPG's waiver request, dated December 20, 1976, and PPG's letter of April 15, 1977

Compliance Schedule Number 1:

- | | |
|--|-------------------|
| 1. Date by which equipment will initially be ordered | July 1, 1977 |
| 2. Date of commencement of on site construction | December 30, 1977 |
| 3. Date of completion of on site construction | October 1, 1978 |
| 4. Date of final compliance and date on which this waiver terminates | October 21, 1978 |

SL 105268

<u>Applicable Regulation</u>	<u>Emission Point</u>	<u>Description</u>
§61.65(b)(1)	VCM Plant	Loading and unloading lines
§61.65(b)(2)	VCM Plant	All slip guages on VCM tank cars
§61.65(b)(3)(i)	VCM Plant	Rotating pumps (as identified in PPG's waiver request dated December 20, 1976)
§61.65(b)(5)	VCM Plant	Manual venting of equipment prior to opening, as identified in PPG's letter of April 15, 1977
§61.65(b)(6)	VCM Plant	Opening of equipment, as identified in PPG's letter of April 15, 1977
§61.65(b)(7)	VCM Plant	Sample taking and disposal

Compliance Schedule Number 2:

- | | |
|--|-------------------|
| 1. Date by which equipment will initially be ordered | September 1, 1977 |
| 2. Date of commencement of on site construction | January 2, 1978 |
| 3. Date of completion of on site construction | July 28, 1978 |
| 4. Date of final compliance and date on which this waiver terminates | October 21, 1978 |

<u>Applicable Regulation</u>	<u>Emission Point</u>	<u>Description</u>
§61.65(b)(3)(i)	VCM Plant	As identified in PPG's waiver request, dated December 20, 1976
§61.65(b)(3)(iv)	VCM Plant	Reciprocating VCM vent compressor

Compliance Schedule Number 3:

- | | |
|--|-------------------|
| 1. Date by which equipment will initially be ordered | September 1, 1977 |
| 2. Date of commencement of on site construction | November 1, 1977 |
| 3. Date of completion of on site construction | March 31, 1978 |
| 4. Date of final compliance and date on which this waiver terminates | October 21, 1978 |

SL 105270

<u>Applicable Regulation</u>	<u>Emission Point</u>	<u>Description</u>
§61.65(b)(9)	EDC Plant	Bicarb surge drum drain
§61.65(b)(9)	VCM Plant	Neutralizer flash pot drain

Compliance Schedule Number 4:

- | | |
|--|-------------------|
| 1. Date by which equipment will initially be ordered | September 1, 1977 |
| 2. Date of commencement of on site construction | February 6, 1978 |
| 3. Date of completion of on site construction | July 29, 1978 |
| 4. Date of final compliance and date on which this waiver terminates | October 21, 1978 |