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Aberdeen, Mississippi 39730
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March 28, 1984

Mr. Jerry B. Banks, P.E.
Bureau of Pollution Control
Mississippi Department of Natural Resources
P. O. Box 10385
Jackson, MS 39209

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Dear Mr. Banks:

You will recall that on January 5, 1984, Richard Frohreich of Conoco's Aberdeen Chemical Plant telephoned and advised you that Conoco had conducted an inquiry into the status of the plant's environmental files. A number of plant operating log book entries have been identified which refer to incidents which might possibly have been reportable emergency relief valve discharges. No documentation has yet been located that would indicate that the incidents were reported to the Environmental Protection Agency pursuant to 40 CFR 61.64(a)(3) and 61.65(a). The entries thus identified were logged during the time the plant had a pending waiver application or was operating under an EPA waiver from the NESHAP requirements. Mr. Frohreich informed you that Conoco would provide additional information at the conclusion of its inquiry.

We have now concluded our review of the Aberdeen plant's logs for the period from January 20, 1977 through October, 1978. (The log book for the period May, 1977 to August, 1977 has not been located). The review disclosed six incidents which, in the context of plant terminology and usage, might have been reportable emergency relief valve discharges for which no evidence of reporting has been located. Two other incidents were also uncovered which are believed to have been reported, but documentation to support such reporting has not been located. Details are provided in Attachment A.

Conoco has not included in Attachment A instances described in the log book as leaks, since these are not governed by the reporting requirements of 40 CFR 61.64(a)(3) and 61.65(a). Also excluded from Attachment A are those events which occurred at equipment scheduled to be controlled through one of three systems, i.e., the incinerator, emission recovery system or the in-process water stripping system. Conoco complied with the regulations by installing these three systems prior to August 1, 1978. Until these systems were operational, discharges from vents or relief valves on equipment covered by the waiver could not otherwise be contained or incinerated and, therefore, were not reportable.

Conversations with EPA personnel during the pendency of the waiver application and during the waiver period, supported this impression. The reporting of emissions from equipment covered by the waiver was discussed with Dr. James S. Wu of EPA's Region IV office on February 13, 1977. He indicated that releases from equipment scheduled to be controlled through one of the three systems need not be reported during the waiver period since it was understood by EPA that the plant was in the process of controlling emissions from such equipment.

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RESULTS OF INQUIRY

In order to discuss the relevant log entries, it may be helpful to summarize the chronology of events surrounding EPA's publication of the vinyl chloride regulations and the plant's efforts to demonstrate compliance with the required work practices.

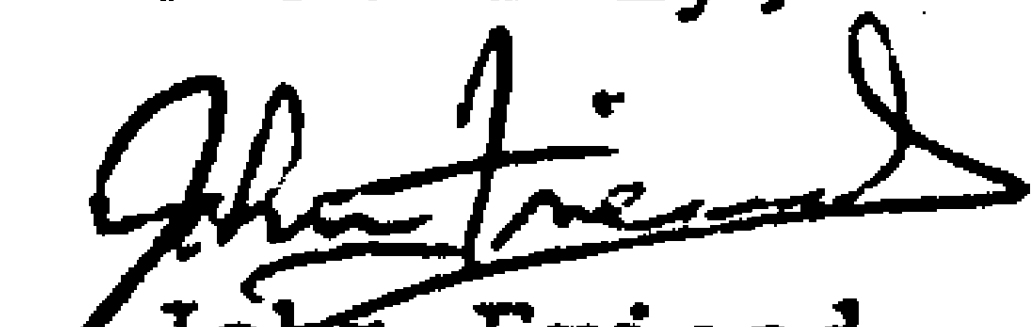
EPA published the vinyl chloride NESHAP in final form on October 21, 1976; compliance was required beginning January 20, 1977 unless a waiver was obtained. On December 20, 1976, Conoco's Aberdeen Chemical Plant applied to the Region IV office of EPA for a waiver of compliance and for additional time to complete installation of control equipment necessary to minimize vinyl chloride emissions. On February 10, 1977, EPA informed the plant of its intent to deny the waiver request. On February 25, 1977, Conoco supplied EPA with additional information. EPA granted the waiver request on March 30, 1977. The waiver approval contained a schedule of interim milestones which the plant was to follow in order to achieve final compliance by August 1, 1978.

While the application for a waiver was pending, and during the period of waiver (March 30, 1977 to August 1, 1978) there was some confusion about the applicability of the relief valve discharge reporting requirements. The overall impression was that the reporting obligation was not applicable to equipment covered by the waiver until the end of the waiver period, when full compliance was expected. It was unclear to the plant whether reporting was required for equipment not covered by the waiver.

Because of this uncertainty, some events may have been reported while others were not. It is my understanding that when EPA delegated the vinyl chloride NESHAP program to the Mississippi DNR, EPA provided the DNR with copies of all relevant documents pertaining to the vinyl chloride sources for which DNR would be responsible. If this assumption is correct, may I ask that you review the EPA file to determine whether it contains any notices from Conoco about the events discussed in Attachment A.

Should you have any questions about the information we are providing, please do not hesitate to call me at (601) 369-8111, extension 2235.

Sincerely,


John Friend
Plant Manager

rah

cc: w/att.: R. McQuade, Justice Department
bcc: JF, RAF, JJH, BIR, EPA FILE

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ATTACHMENT A

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RESULTS OF CONOCO'S REVIEW OF
ABERDEEN, MISSISSIPPI CHEMICAL PLANT'S
OPERATING LOGS FOR
JANUARY, 1977 - OCTOBER, 1978

The material which follows was derived primarily from the operating logs of the Aberdeen Chemical Plant for the period January, 1977 through October, 1978. (The log book for May through August, 1977 cannot be located). At this date, it is impossible to determine whether any of the events were relief valve discharges. For the most part, the only information available is that found in the log entry. In one or two instances we were able to supplement the information with personal recollections of former plant employees.

Date: 02/11/77

Log Entry: "Had Power failure @ 0330 Back on @ 0505."

Comments: Although this entry does not refer to a vinyl release, a contemporaneous internal memorandum notes that manual venting "for five seconds 2 times" was necessary while the operators were setting up additional nitric oxide tanks to be used to kill the reaction in reactor D-400. The reaction needed to be killed because of the power failure. The amount of vinyl estimated to have been vented is 300-400 pounds. The manual venting prevented the relief valve from lifting.

Date: 09/08/77

Log Entry: "Relief Valve on "A" Vac lifting every time inerts are Vented from a Reactor"

Comments: The relief valve on this vacuum pump is very small; any liftings of the valve would have resulted only in small amounts of gaseous discharges. We have no additional information about this event.

Date: 10/06/77

Log Entry: "While we were charging D-500 the safety disc blowed. had all the V.C in it and all water but 33 counts. 'the safety disc on the cond.'"

Comments: It is impossible to determine whether the relief valve lifted when the safety disc blew. We have no additional information about this event. It is being reported to show good faith, not because we have determined that the relief valve lifted.

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Date: 11/27/77

Log Entry: "South V.C.M. Filter pack, S. D. blown & relief vlv lifted, would not reseal, changed same."

Comments: The relief valve on the filter pack is a small one, about 3/4" in diameter. A release from this relief valve would be small. We have no further information about this event.

Date: 03/04/78

Log Entry: "D-600 charged @ 1100, 5305-w/158° Set point @ 1245 the Condenser Safety Disc blew @ this time Rx was on 148° & 144# press. & 130 amps. killed, recovered, will change out all safety disc when down."

Comments: This entry omits any mention of a relief valve discharge. However it is possible that the relief valve above the condenser safety disc might have lifted momentarily. This is one of the incidents which we believe was reported to EPA but which we have not found documentation of our report.

Date: 04/16/78

Log Entry: "744 charged @ 1158, reached heat-up @ ≈ 1400, just as it reached heatup the rupture disc & relief valve on the shell blew, temp = 150°F, pressure 163#"

Comments: This is another incident which we believe was reported to EPA but for which we have not found documentation of our report. The EPA file may contain a notice letter.

Date: 05/22/78

Log Entry: "Charged D500 got 400 ct of Water 400 ct VCM Safety blew. Recovery on same. high pressure."

Comments: It is impossible to determine whether the relief valve lifted. We have no further information about this event. It is being reported to show good faith, not because we have determined that the relief valve lifted.

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Date: 05/23/78

Log Entry: "Why does safety disc. blow on filter packs in old unit."
"surge when pump starts"

Comments: This entry omits any mention of a relief valve discharge. However, it is possible that the relief valves on the filter packs lifted when the safety discs blew. We have no additional information to determine whether this in fact occurred. This entry is included to show good faith, not because we have determined that the relief valve lifted.