

ENVIRONMENTAL PROTECTION AGENCY

Office of Air Programs
Research Triangle Park, North Carolina 27711

July 21, 1972

RECEIVED
JUL 24 1972

Continental Chemical Co.
Park 80 Plaza East
Saddlebrook, NJ 07662

J. D. BURNS

Attention: Mr. J. D. Burns

Dear Sir:

The Environmental Protection Agency, Office of Air Programs is engaged in a study of atmospheric emissions from the Petrochemical Industry. The primary purpose of this study is to gather information that will be used to develop New Stationary Source Performance Standards which are defined in Section 111 of the Clean Air Act as amended December 31, 1970 (Public Law 91604). These new source standards will not be set as part of this study but will be based (to a large extent) on the data collected during this study.

A substantial part of the work required for this study will be performed under contract by the Houdry Division of Air Products and Chemicals. Several other companies not yet chosen will assist in the source sampling phase of the work.

Very little has been published on atmospheric emissions from the petrochemical industry. The first part of this study will therefore rank the most important petrochemical processes in their order of importance in regard to atmospheric emissions. The Petrochemical Emissions Survey Questionnaire will be the primary source of data during the first phase. This ranking will be based on the amount and type of emissions from the process, the number of similar processes and the expected growth of the process. A second in-depth phase of the study to document emissions more completely will be based on information obtained through actual stack sampling.

Attached you will find a copy of the petrochemical questionnaire which you are requested to complete and return to the Environmental Protection Agency within forty-two (42) calendar days. Hence, we anticipate its receipt on or before September 11, 1972. The subject process for this questionnaire is the production of vinyl chloride monomer by the pyrolysis of ethylene dichloride as practiced at your Lake Charles, Louisiana plant.

CCR 000035542

You are required by Section 114 of the Clean Air Act to complete each applicable part of this questionnaire except for question II.4. and II.5. These two questions are concerned with the water and solid waste generated by the process itself not with that generated by the emission control equipment. This information would be of a value to the EPA and your answers will be appreciated.

This questionnaire is to be completed using the information presently available to your company. We are not asking that you perform special non-routine measurements of emissions streams. We are asking for results of measurements that you have made or for estimates when measurements have not been made. Where requested information is not available, please mark sections "not available". Where the requested information is not applicable to the subject process, mark the questionnaire sections "not applicable". A sample questionnaire, filled out for a fictitious process is enclosed for your guidance.

It is the opinion of this office that for most processes it should be possible to answer all survey questions without revealing any confidential information or trade secrets. However, if you believe that any of the information that we request would reveal a trade secret if divulged you should clearly identify such information on the completed questionnaire. Submit, with the completed questionnaire, a written justification explaining the reason for confidential status for each item including any supportive data or legal authority. Forward a duplicate of your claim and supporting material, without the questionnaire data, to our counsel, Mr. Robert Baum, Assistant General Counsel, Air Quality and Radiation Division, Environmental Protection Agency, Room 17B41, 5600 Fishers Lane, Rockville, Maryland 20852. Emission data cannot be considered confidential.

Final authority for determining the status of the information resides with the Environmental Protection Agency. A reply describing the decision reached will be made as soon as possible after receipt of the claim and supporting information. During the period before the final determination this office will honor any request to treat the questionnaire information as confidential.

Information declared to be a trade secret is subject to protection from being published, divulged, disclosed or made known in any manner or to any extent by Section 1905 of Title 18 of the United States Code. The disclosure of such information, except as authorized by law, shall result in a fine of not more than \$1,000 or imprisonment of not more than one year, or both; and shall result in removal of the individual from his office or employment.

Although it should be noted that Section 114, Subsection C of the Clean Air Act allows such information to be disclosed "to other officers, employees, or authorized representatives of the United States concerned with carrying out the Act or when relevant in any proceeding under this Act," no confidential information will be revealed to any private concern employed by the Environmental Protection Agency to assist in this study.

The handling and storage of information for which the determination is pending or information which has been determined to be of a confidential nature is carefully controlled. Preliminary control procedures require that the material be labeled confidential and stored in a locked file.

The complete form should be mailed to:

Mr. Leslie B. Evans
Environmental Protection Agency
Office of Air Programs
Applied Technology Division
Research Triangle Park, NC 27711

It is possible that additional copies of this questionnaire which will request information covering other petrochemical processes or other plants using the same process and operated by your organization will be sent to you in the course of this study. Clarification of items contained in the questionnaire may be obtained from Mr. Evans by telephone at 919/688-8146. Thank you for your help in this matter.

Sincerely,



Leslie B. Evans
Industrial Studies Branch

CCR 000035544