CONOCO

Interoffice Communication

To : Vinyl Shift Supervisors

From : J. E. Barton

Date : March 20, 1979

Subject : EPA COMPLIANCE

The following items need to be done to assure EPA compliance reguarding VCM emissions.

1. The date must be stamped on the Honeywell recorder charts each morning at 7:00 a.m. When the Honeywell charts are replaced the number of the Honeywell unit is to be written on the bottom of the chart. All used charts are to be turned into me.

2. All recovered VCM receivers are not to be filled above 80%.

3. The high pressure alarms on the blowdown tank in each unit will be reset to 40 psig.

4. The Emergency Kill Procedure has been revised as follows:

Emergency Shutdown

The following parameters are to be the maximum limits on a runaway reaction. The reaction should be killed with AMS if either one of the parameters is exceeded.

Resin	Maximum Temperature	Maximum Pressure
5385, 5425, 5465	142°F	145 PSIG
5305	162°F	175 PSIG

A runaway reaction immediately after charge and heat-up indicates that the reactor condenser may be plugged, and that the reaction must be killed.

If AMS will not kill the reaction, use the nitric oxide (N_2O_4) short stop system. CAUTION: N.O. is a highly poisonous orange-colored gas. A Scott Air Pack or a "Rocket Fuel" cannister mask must be worn while killing a reactor with the N.O. short stop system.

The runaway reaction must be killed immediately if either one of the pressure or temperature limits listed above are exceeded. If the reaction is allowed to exceed these limits, it may not be controllable and result in a relief valve or rupture disc discharge to the atmosphere.

5. The emergency nitric oxide kill system for all the reactors has been pressure checked to assure integrity of the systems. These systems will be pressure checked each six months with nitrogen.

6. After every coarse batch produced the reactor condenser will be inspected to determine if it is plugged. If the condenser is found to be plugged, it will be cleaned prior to charging the next batch.

7. Copies of the procedures for the Old Unit, New Unit, and Dryers will be placed on the table between the Lead Operators' desks in the control room. There will also be copies in the Shift Supervisor's office and Operations Supervisor's office for your reference.

Please conduct a formal review with your people on the seven items above and the attached Work Practice Controls for the OSHA VCM Standard. Write the review meeting up on the safety meeting form and return it to me.

I would like to have all the meetings completed by 4/8/79.

J. E. Barton

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c: CLM, ELK, RAF, Shift Supervisors (5)