



INTERNAL CORRESPONDENCE

HEALTH, SAFETY AND
ENVIRONMENTAL AFFAIRS

P. O. BOX 471, TEXAS CITY, TEXAS 77590

June 13, 1984

To: S. M. Norwood
Texas City Plant

Copy to: T. T. Do-Hoang
J. B. Leverton/S. J. Footer
W. P. Nickles
F. S. Provenzano
E. R. Saldua

Subject: Leak Detection and Elimination Plan, NESHAPS for
Vinyl Chloride, Acct. #GB-0076-J, Solution Vinyl
Resins, Texas City Plant, Approval of Plan, TACB
Letter Dated June 5, 1984

Dear Sam:

Attached is the letter of approval for the above cited Leak Detection and Elimination Plan for your production facilities. Please note that this approval is contingent upon the incorporation of the measures previously cited in the October 5, 1983 letter and my recent letter of May 17, 1984 into your standard operating procedures. This includes all the necessary record keeping, as well. If there are any questions about what should be done, we can schedule a short status review meeting in the near future to fix an action plan to avoid any future problems in this area of your activities.

You can be fairly certain that the next TACB Annual Compliance Inspection will include a followup on this matter. Also, any internal UCC audits will require reporting of the matter and the remedial action taken to comply with Corporate policy.

I would like to commend Thuy Do for her diligence and quick action in providing the information requested by the TACB in their original letter.

Please contact me if there is any more I can do to help.

Sincerely,


J. F. Erdmann

JFE:IR
Attachment
LeakSVR2

UCC
060573.01

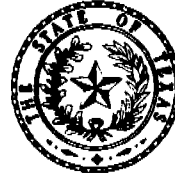
6/8/84 Orig. to: J. F. Erdmann cc: J. B. Leverton, S. J. Footer, F. S. Provenzano

TEXAS AIR CONTROL BOARD

6330 HWY. 290 EAST
AUSTIN, TEXAS 78723
512/451-5711

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HUBERT OXFORD, III

June 5, 1984

RECEIVED
JUN 7 1984
FSP

J.F.E.
JUN 12 1984

Mr. F. S. Provensano
Plant Manager
Union Carbide Corporation
Post Office Box 471
Texas City, Texas 77590

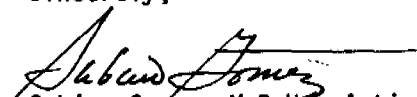
Re: Leak Detection and Elimination Plan
National Emission Standard for
Vinyl Chloride (40 CFR 61.65(b)(8))
Account No. GB-0076-J

Dear Mr. Provensano:

We have completed our review and evaluation of the information contained in your October 5, 1983 and May 17, 1984 letters regarding the referenced matter. Based on information provided in your letters, we have determined that your leak detection and elimination plan can be approved. Plan approval is dependent on full incorporation of its measures into standard operating procedures and is subject to verification during agency investigations.

Your cooperation in this matter is appreciated. If you have any questions, please contact us.

Sincerely,


Sabino Gomez, M.P.H., Acting Director
Compliance Division

cc: Mr. Herbert W. Williams, Jr., Regional Director, Houston



Celebrating 150 Years of Texas Independence 1836 - 1986

UCC
060574



UNION CARBIDE CORPORATION P O BOX 471, TEXAS CITY, TEXAS 77590

HEALTH, SAFETY AND
ENVIRONMENTAL AFFAIRS

May 17, 1984

Mr. Sabino Gomez, MPH
Acting Director, Compliance Division
Texas Air Control Board
6330 Highway 290 East
Austin, TX 78723

Subject: Leak Detection and Elimination Plan, NESHAPS for
Vinyl Chloride, Acct. No. GB-0076-J, Texas City
Plant, Solution Vinyl Resins

Dear Mr. Gomez:

This is in response to your inquiry on the above subject to
Mr. F. S. Provenzano, our Plant Manager, in a letter dated April
20, 1984.

The following information is submitted in connection with your
specific listed questions:

- 1) The concentration of vinyl chloride monomer in the
standard gas used to calibrate the portable monitors is
100 ppm, by volume.
- 2) The standard gas, which is a mixture of vinyl chloride
with either air or nitrogen, is prepared by our plant
analyzer group here in the plant. An assigned instrument
man is in charge of making this standard calibration gas
mixture according to detailed procedures which have been
written for this purpose. Pure vinyl chloride purchased
from Matheson is certified.
- 3) Ambient air background vinyl chloride samples have not
been taken on a frequent basis because the Solution Vinyl
Resins unit is the only source of vinyl chloride in our
plant and in the Texas City area, to our present
knowledge. As you know, the Suspension and Non-Solvent
process units at this location were permanently shut down
and completely dismantled.

The monitoring system frequently prints out "zero" VCM
concentrations from the various sample points, which
indicates that the VCM levels are below the 0.1 ppm
detection limit of the analyzer. This low level is thus
not significant as a background concentration to require
any correction to the monitor printout in deciding the
presence of a leak anywhere within the unit battery
limits.

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060575

Mr. Sabino Gomez
May 17, 1984
Page 2

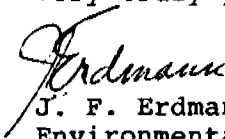
- 4) In case the continuous vinyl chloride monitoring system (VFA) fails, our highest maintenance priority, including overtime, is applied to return the monitor to service in the shortest possible time. If the system is projected to be out of service for more than two days, additional personnel monitoring will be conducted to protect personnel from exposure.

The autoclave operators are responsible for monitoring the VFA results because they are most suitably situated in terms of job characteristics and physical proximity. The analyzer computer and printer are all located in the Bldg. 115 control room next to one of the main operating panelboards which are attended constantly by the operators, so it is a part of their duties to monitor this system along with the regular process controls.

The VFA system is equipped with an audible alarm and it sounds off at a pre-set level (5 ppm VCM, at present) to notify the operators immediately of the presence of a VCM leak. Corrective action can then be taken under our prescribed procedures to stop the leak.

All of the above information has been obtained through consultations with our production unit supervisors and environmental protection unit representative at the Solution Vinyl Resins Unit. Please contact me if there is any need for additional information or if you have further questions.

Very truly yours,


J. F. Erdmann, P.E.
Environmental Protection
Coordinator
(409) 948-5126

JFE:IR
TLeakSVR

bcc: J. B. Leverton/S. J. Footer
W. P. Nickles
F. S. Provenzano
S. M. Norwood
T. T. Do-Hoang
E. R. Saldua

UCC
060576

To. Jack

Date. 5-16 Time 9:20

WHILE YOU WERE OUT

Mr. Logellio

of _____

Phone. _____

TELEPHONED	PLEASE CALL HIM HER
CALLED TO SEE YOU	WILL CALL AGAIN
RETURNED YOUR CALL	RUSH

Message. Will be here
at TC Plant at about
10:00 or 10:15

CT-1406

UCC
060577

5-16-84

need to know whether
VK is 55 ppm by vol or by wt -

dr HORACE CARPENTER - ANNE. CO
Leaderman.
Pages 71-625

LARRY PRASEK - working for H&S
ordered cylinder of Matheson at 10-12 ppm.
also to meet - for the
Ernie Saiter - may know - [by Vol]

- Background VKs within plant area - normally
less than
0.1 ppm +
nothing significant - has no effect
on leak detection
activities