

A
CONFIDENTIAL

COMPLIANCE PLAN

ABERDEEN CHEMICAL PLANT

ABERDEEN, MISSISSIPPI

INTRODUCTION

This Compliance Plan (hereafter "Plan") is being submitted by Conoco Inc. and Vista Polymers Inc. in satisfaction of one of the conditions of the Consent Decree entered in the United States District Court, Northern District of Mississippi (Civil Action No. EC-84-37-NB-D) on August 19, 1985.

The Plan has a fourfold purpose: (1) to describe measures, procedures and equipment already in effect at the plant aimed at reducing, preventing, abating or otherwise controlling emissions of vinyl chloride from equipment in vinyl chloride service; (2) to describe proposed changes in methods and procedures and proposed retraining for plant personnel, aimed at maintaining compliance with the requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for vinyl chloride; (3) to describe proposed equipment revisions for maintaining compliance with the NESHAP requirements for vinyl chloride; (4) to request that certain equivalency modifications be granted.

The Plan provides a sectional review of plant compliance with the NESHAP for vinyl chloride. The Plan includes:

1. Proposed modifications to the plant or its practices are covered under the appropriate sections.
2. Descriptions of pertinent operating and maintenance procedures utilized to ensure compliance with the NESHAP for vinyl chloride or are referenced if previously submitted to EPA.
3. Three requests for equivalency modifications along with pertinent supporting data. These requests concern equipment opening, steam stripping/reactor opening loss and test method 107.
4. A description of plant maintenance and training procedures.
5. A request to approve minor modifications to the Leak Detection and Elimination Plan.

A process description of plant areas which are in vinyl chloride service, including processes installed to assure compliance with the NESHAP, was included in the information submitted under section III. A. of the Consent Decree.