

To: R. A. Conrad

From: S. C. Racca
Date: August 12, 1985

Subject: Auto Tiebreaker at the Stauffco Substation

Interoffice
Communication

VISTA

Attached for your signature is an AFE for an Auto Tiebreaker at the Stauffco Substation. This project is included in the "Emission Control Plan" to be submitted to the EPA in partial satisfaction of the conditions of the USA vs. Conoco Consent Decree recently entered into by Vista. In the Conoco/Vista meeting of July 24, 1985, it was agreed that this project would be funded 50/50 by Conoco and Vista. To ensure reimbursement by Conoco, sufficient documentation of expenditures must be maintained by Vista for eventual inspection by Conoco representatives. Regardless of who (LCVCM or LCCP personnel) coordinates installation of this project, they should be made aware of this requirement. A final agreement concerning minimum required documentation has not been signed. Table I (attached) lists minimum required documentation per the latest draft agreement.

If there are any questions or comments, please contact me.

Stephen C. Racca

Stephen C. Racca
Process Engineer

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cc w/o enc: PEM-JRH-WPS-JMT

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TABLE I. "Emission Control Plan" Physical Measures
Expenditure Documentation

- 1) All commitment documents including:
 - a) Contracts for construction and other services.
 - b) Purchase Orders for equipment, materials, and other items or services.
 - c) Change Orders to all contracts and purchase orders.
 - c) Field orders, register tickets, or similar authorizations for extra work.

Included in the above shall be all documents forming a part of the contract, purchase order, etc. such as purchase specifications, drawings, etc.

- 2) All cost reports, including all available detail reports, work sheets, etc.
- 3) All invoices for all purchases and services, including all backup documentation such as time sheets, payroll records, invoices for reimbursable items, etc.
- 4) All vouchers or similar documents showing charges for Vista labor and other "internal" charges.
- 5) All project files including all correspondence, notes, requisitions, contract administration information, bidding documents, bid tabulations, and other files.

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CONSENT DECREE ADMINISTRATIVE
MEASURES

I. Operator Training

A) New Hires

- 1) For new hires training of 112 hours during the first three weeks of employment following a structured training program focusing on many different areas related to the plant operation.
- 2) Day Two (2) of the program consists of a detailed environmental overview (4 to 6 hrs.) of the plant focusing mainly on:
 - a) Relief Valves and Liquid Full Systems
 - 1) Anatomy and purpose of relief valves
 - 2) Liquid full systems (ie: S-206 and the check tanks)
 - 3) Thermal reliefs: situations to avoid; purpose
 - 4) Relief valve inspection log
 - 5) Tour unit to point out above mentioned items
 - 6) Discussion of past releases, their cause, and preventive measures taken
 - b) Incinerator Activities
 - 1) Communications
 - 2) BL-410 - venting while loading
 - 3) Venting of hoses and lines
 - 4) BL-412 operation & purpose
 - 5) Tour unit to point out above mentioned items
 - 6) Discussion of past bypasses, their cause, and appropriate preventive measures taken
 - c) Comprehensive Test on the Environmental Subject Matter Covered and Section Tests on Other Subjects Covered

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d) Document Training for File

B. Experienced, Permanent Employees

- 1) For permanent experienced employees, 8 hours of review training annually to cover such items as:
 - a) Relief valve release avoidance
 - b) Incinerator bypass prevention and proper communications
 - c) Emergency Situations
 - 1) Situations of emergency will be covered along with safety meetings as "Emergency Drills". Emphasis on the environmental aspects of a situation will be stressed (1 hr./session).
 - 2) Power failure "First Action Steps" will be developed for each job classification and a training session scheduled annually (1 hr./session).
 - 3) Steam outage "First Action Steps" will be developed and training sessions held annually (1 hr./session).
 - 4) N2 outage "First Action Steps" will be developed and training sessions held annually (1 hr./session).
 - 5) Proper response procedures should impurities be introduced into reactor feeds (ie: off spec chlorine) will be covered annually (1 hr./session).

C) Operator Progression

- 1) Operators who are promoted from one classification to the next will be tested on job functions along with environmental aspects of their new assignment.
 - 2) Safety Certification at each level will have points focusing on environmental matters.
- D) All training will be documented and will include employee names, dates, subject matter covered and any important points addressed during the training.

II. Operating Procedures

- A) The operating manual for the VCM Plant will be updated to include a section on environmental awareness concerns.

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- B) Unit operators and supervisors will receive specific notice of any major change in plant equipment or operating procedures affecting their unit.
- C) New procedures, when written will be added to the appropriate operating manuals (on going). New procedure discussions will be held on shift as required.
- D) Prior to startup, critical procedures that could have environmental impact will be reviewed with the operators (ie: removing nitrogen from C-202 before furnace startup).
- E) Charts listing relief valve set pressures will be available in the main control room to aid operators during abnormal situations.
- F) Prestartup checklists for critical operating columns will be developed to include:
 - 1) Purge requirements
 - 2) Potential upsets or things to watch for
 - 3) Listing of cookbook steps to bring on line
- G) Incinerators when brought on line following major maintenance will be placed in standby for 24 hours before introducing vent streams. This will allow for proper check-out of the unit in a standby mode.

III. Inspections and Preventive Maintenance

The program is designed to cover all equipment in vinyl chloride service and also the vent incinerators. The program includes inspection and fixed maintenance schedules which would be used to detect conditions which could lead to potential environmental excursions involving relief valves or the incinerators. The program consists of but will not be limited to:

- A) Weekly inspection of incinerator combustion air control system to include air readouts, oxygen sensors and cascaded controllers.
- B) Daily inspection of rotating equipment for proper oil levels, bearing temperature and noise levels.
- C) Bi-monthly inspection of incinerator burner inserts for corrosion and pluggage.
- D) Quarterly inspection of product sphere and rundown tank pressure, level and alarm instrumentation.
- E) Quarterly inspection and check of column instrumentation to include alarm checks.
 - 1) C-203, Vinyl Column
 - a) Overhead pressure transmitters and alarms
 - b) Bottoms and condenser level transmitters

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- c) Temperature controllers on the column steam reboiler
- 2) C-202, HCl Column
 - a) Overhead pressure transmitters and alarms; to include vent valves to incinerator and C-500
 - b) Seal tray level and temperature control transmitters and alarms
- 3) S-206, Vinyl Caustic Decanter
 - a) Pressure and level transmitters
 - b) S-203, Relief Valve Collection Pot, pressure transmitters
- F) The safety check program will be used before startups (as needed).
- G) Relief valve maintenance P.M. program (to coincide with plant turnarounds).
- H) Incinerator Blower controls P.M. (semi-annual).
- I) Vessel inspection program (set schedule on certain vessels and others to coincide with turnaround).
- J) The caustic dryer pressure drop will be routinely observed and complete dryer washouts will be done as required.
- K) Annual checkout of incinerator instrumentation to include:
 - 1) Shutdown devices and setpoints
 - 2) Flame arrestor instrumentation

IV. Miscellaneous

A) Incident Investigation

- 1) Investigation - a formal investigation by a team of employees (Operations Supervisor, Environmental Coordinator and others as needed) will be conducted following each incident involving an environmental matter. The investigation will include a detailed report of the incident including future preventative actions to be taken.
- 2) Counseling - special counseling of operators (documented) will be conducted following any incident involving an environmental concern.

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B) New Projects and Designs

- 1) Designs - designs associated with the VCM Plant will include an "Environmental Checklist" and a statement regarding the "Environmental Impact" of the design on the unit.
- 2) New Projects - following installation of new and/or replacement equipment, the various departments in the plant will conduct a "Safety and Environmental Audit" of the installation before startup.
- 3) Leak Checking - vessels and equipment will be leak checked and/or hydrotested before being placed on line.

C) Documentation and Followup

- 1) Environmental Reporting Manual - a manual including procedures and proper documentation for environmental matters will be formulated and revised as needed.

D) Maintenance Department

- 1) Communications between departments will be stressed at monthly safety meetings and during safe work permit issuance.
- 2) All maintenance employees will be schooled on environmental matters (ie: incinerator bypass prevention as it relates to their job) annually.

E) Training - all training sessions and related items in the environmental area will be accompanied with written documentation.

F) Followup - a checking procedure to assure environmental compliance will be developed and reviewed monthly. The checklist will include present requirements and near future requirements so that scheduling can be arranged.