

VICE MEMO

PPG CHEMICALS

LAKE CHARLES

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DATE: MARCH 28, 1990

SUBJECT: PLAN TO MEET THE
NEW 1 PPM EDC
IPEL AT LP/EDC

IN RESPONSE TO OUR DERIVATIVES 1990 ENVIRONMENTAL GOALS,
BELOW IS A LIST OF SOURCES OF EDC EXPOSURE AT #1 AND 2 LP EDC
PLANTS THAT MUST BE CORRECTED TO COMPLY WITH THE 1 PPM IPEL
GUIDE LINES. INCLUDED IS A LIST OF SUGGESTED SOLUTIONS.

SOURCES OF EDC EXPOSURE

1. ROUTINE SAMPLES.
 - A. closed loop sampling.
2. ORTHOTOLINE CHLORINE CHECK IN REACTOR CRUDE.
 - A. in line chlorine analyzer at rx. condenser drain.
3. ETHYLENE ANALYER VENT.
 - A. system to put vent to incinerator header.
 - B. remove edc with carbon.
4. RECHARGING OF DRYERS AND NEUTRALIZERS.
5. CLEARING OF PUMPS.
 - A. to clear pump suction/bowl for seal job, a portable N2 driven pump will be connected to low point drain and all liquid will be pumped back to system, then N2 purged to vent header.
6. #2 AND #4 EDC TANKS USED AS AREA BTMS STORAGE TANKS.
 - A. install bs&b vent valves and compress vents to incinerator.
7. CLEARING OF TANKS, VESSELS, AND COLUMNS.
 - A. purge to incinerator.
 - B. purge through carbon bed.
 - C. vacuum pump exhaust to incinerator.
 - D. vaporize to incinerator using N2 through portable heater.
8. VENT HEADER LIQUID.
 - A. install knock out pots with pumps to transfer liquid back to system.
9. SPENT SAMPLE ACCUMULATION BOX.
 - A. system to transfer liquid back to system.

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10. EDC REACTOR LIQUOR SAMPLES.
 - A. forced circulation closed loop sampling.
11. RUNNING ANALYSES IN PLANT LAB.
 - A. new lab vent hood.
 - B. edc monitor for lab.
12. PUMP SEAL LEAKS.
 - A. double seal system .
13. VALVE PACKING LEAKS.
 - A. change specs to orbit valves.
14. FUGITIVE LEAKS.
 - A. area edc monitor.
 - B. hand held edc monitor.

ANY ADDITIONAL ITEMS IDENTIFIED WILL BE SENT AT A LATER DATE.
PLEASE FEEL FREE TO ADD ANY ITEMS THAT YOU THINK OF THAT WE
MAY HAVE MISSED.

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CPH-

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