

Interoffice
Communication

To: Distribution

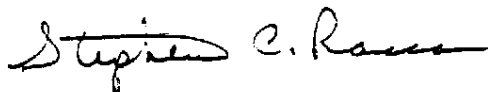
From: S. C. Racca
Date: February 3, 1986

Subject: HCL Column (C-202) Release Reporting Guidelines

VISTA

Attached are guidelines for reporting the release of HCL and/or VCM during periods when the HCL Column (C-202) must be vented, to C-500 or an incinerator absorber, to relieve on overpressure condition. The guidelines reflect the commitment made in the "Emission Control Plan" submitted to the EPA in partial satisfaction of the conditions in the U.S. vs. Conoco Consent Decree. The guidelines are divided into two time frames - during pendency and following termination of the Decree. This separation will insure compliance with commitments in the Plan, as well as, applicable state (LESHAP and Notification Regulations and Procedures for Unauthorized Discharges) and federal (Superfund) regulations.

Please review the attached and if there are any questions or comments, contact me.



Stephen C. Racca
Process Engineer

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~~Distribution~~

~~RAC-DEM-GEH-MLA(5)-MCM-PLF-WPS-VMF-MWC-SVC-MGH-ERT~~
~~JCL-WLM(Houston)~~

CWH 000001224

HCL COLUMN (C-202) RELEASE REPORTING GUIDELINES

I. During Pendency of U.S. vs. Conoco Consent Decree

A. Documentation

All incidents in which HCl is vented from the overhead of the HCl Column must be documented. Documentation must include a description of the nature and cause of the incident and is to be retained for at least two years.

B. Reporting

1) Greater than 10 ppm VCM in HCl Column Overhead.

All incidents in which HCl is vented from the overhead of the HCl Column and the concentration of VCM in the overhead is greater than 10 ppm must be reported in LESHAP (Louisiana Emission Standards for Hazardous Air Pollutants) quarterly reports in a manner consistent with that of the June 15, 1984 LESHAP quarterly report (per Emission Control Plan commitment).

2) Greater than 10% VCM in HCl Column Overhead.

All incidents in which HCl is vented from the overhead of the HCl column and the concentration of VCM in the overhead is greater than 10% must be reported in accordance with LESHAP Sections 77.6(a) and 76.18.

3) Greater than 5,000 lbs. HCl or 1 lb. VCM Released in 24 hrs. or 100 lbs. HCl Released in any Consecutive 3 hr. Period

Make the appropriate verbal (immediate) and written notifications to the Louisiana Department of Environmental Quality (LDEQ) and National Response Center (NRC) in accordance with the Release Reporting Guidelines (Revision - 1) IOC from E. R. Taylor to Distribution dated January 14, 1986 (or the appropriate revised versions of this IOC). Note that this IOC states that "... Superfund reporting is not required if... A report is made under NESHAP or LESHAP...". In other words, if a notification under item B.2. above is made, then notification to the NRC in accordance with Superfund is not required.

II. Following Termination of U.S. vs. Conoco Consent Decree

A. Documentation

All incidents in which HCl is vented from the overhead of the HCl Column must be documented. Documentation must include a description of the nature and cause of the incident and is to be retained for at least two years.

B. Reporting

- 1) Greater than 10 ppm VCM in HCl Column Overhead.

No reporting required.

- 2) Greater than 10% VCM in HCl Column Overhead.

All incidents in which HCl is vented from the overhead of the HCl column and the concentration of VCM in the overhead is greater than 10% must be reported in accordance with LESHAP Sections 77.6(a) and 76.18.

- 3) Greater than 5,000 lbs HCl or 1 lb. VCM Released in 24 hrs. or 100 lbs. HCl Released in any Consecutive 3 hr. Period.

Make the appropriate verbal (immediate) and written notifications to the Louisiana Department of Environmental Quality (LDEQ) and National Response Center (NRC) in accordance with the Release Reporting Guidelines (Revision - 1) IOC from E. R. Taylor to Distribution dated January 14, 1986 (or the appropriate revised versions of this IOC). Note that this IOC states that "... Superfund reporting is not required if... A report is made under NESHAP or LESHAP...". In other words, if a notification under item B.2. above is made, then notification to the NRC in accordance with Superfund is not required.

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