

Q. X. K. R. 4



Interoffice Communication

To Distribution
From D. A. Kuhn
Date April 16, 1979
Subject VCM SAFETY ASSOCIATION MEETING - 3/29/79

This IOC will supplement Dick Frohreich's report dated April 4, 1979. The oxychlorination vents in VCM plants are being handled by other companies as follows:

Shell has successfully piloted oxygen-based oxy and is installing it at Deer Park, Texas to be complete before the end of the year. If they are successful there they will install it later at their Norco, Louisiana VCM plant. Emissions from oxy will be piped to an incinerator.

Borden has air oxy but none the less leads this vent through an incinerator. They have a dual fuel system, supplementing it with other plant vents.

Georgia Pacific uses PPG's oxygen oxy technology. They have an incinerator.

Diamond uses Goodrich technology practicing air oxidation. They also put this vent through an incinerator and believe this is required by the State of Texas.

Dow has oxygen-based oxy and puts all their vents through an incinerator.

Ethyl Corporation is probably air-based and may not have an incinerator.

Allied has air-based oxy discharging directly to the atmosphere with no control device.

A poll of the group revealed:

6 PVC plants were using carbon adsorption.

14 PVC plants were using incineration.

9 PVC plants were using incineration.

3 PVC plants were using solvent absorption.

10 PVC plants were using single incinerators.

4 VCM plants and 3 PVC plants were using flares as backups.

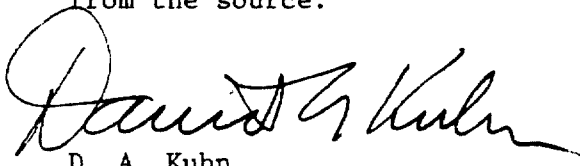
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Great American uses solvent absorption but an incinerator backup.

Tenneco would go to a flare when the incinerator was down but this was not considered a valid alternate control device.

There was some discussion of what constituted a leak. Some have established the definition that a leak is 25 ppm VCM measured 3 feet from the source.



D. A. Kuhn

DAK/nl

Distribution: John Friend - OKC
Jim DeBernardi - LC VCM
Curry Miller - Aberdeen
Don Sanders - PED - Ponca City
Dick Frohreich - Aberdeen
Gary Foshee - LC VCM
John McCulley - PED - Ponca City
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