

4/23/84 Orig. to: J. F. Erdmann ✓ J. B. Levertton
cc: S. J. Footer F. S. Provenzano

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April 20, 1984

J.F.E.
APR 25 1984

Mr. F. S. Provensano
Plant Manager
Union Carbide Corporation
Post Office Box 471
Texas City, Texas 77590

Re: Leak Detection and Elimination Plan
National Emission Standard for
Vinyl Chloride (40 CFR 61.65(b)(8))
Account No. GB-0076-J

Dear Mr. Provensano:

In my letter of August 23, 1983, you were informed that this agency had assumed responsibility for the review and approval of the leak detection and elimination plans submitted to the U.S. Environmental Protection Agency (EPA) pursuant to the referenced CFR citation. You were also provided an opportunity to make appropriate changes to the December 3, 1976 plan submitted by the company. Your October 5, 1983 letter updated your plan and reported that the Suspension/Non-solvent Vinyl Resin Unit is no longer operating.

We have completed our review and evaluation of your revised plan and have found several deficiencies/discrepancies. ~~We are requesting that you submit additional information as follows:~~

1. Concentration of VC in the standard gas used to calibrate the portable monitors;
2. Verification that the standard gas used to calibrate the portable monitors is certified;
3. Information regarding the background concentration of VC at the plant site; and
4. Information regarding an alternate plan should the continuous monitoring system go down (other plans, for instance specify that operators will check each point on the continuous monitor system hourly, with portable detectors in the event of a system failure).

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Mr. F. S. Provensano

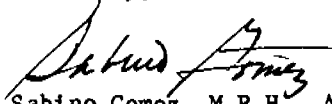
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April 20, 1984

In addition, there is a potential weakness in the plan in that the autoclave operator is responsible for monitoring the results of the continuous monitoring system. The plan makes no mention of an alarm system to notify personnel of the presence of a leak, so it is conceivable that an operator that is assigned two different duties might not be aware of the existence of a leak as soon as it occurs. We are requesting that you either (1) supply more information on the specific responsibilities of the autoclave operator, so that we can determine whether the operator actually has enough time to devote to the continuous monitoring system, or (2) commit to install an alarm system with an alarm(s) at a suitable set point(s). In any case we would like to know why a leak alarm is not a part of the continuous monitoring system, if in fact, it is not. We would appreciate receiving such information within thirty (30) days.

Your cooperation in this matter is appreciated. If you have any questions, please contact us.

Sincerely,



Sabino Gomez, M.P.H., Acting Director
Compliance Division

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