



PPG INDUSTRIES, INC. INDUSTRIAL CHEMICAL DIVISION P. O. BOX 1000 LAKE CHARLES, LA. 70601

March 12, 1979

Mr. Howard G. Bergman
Director, Enforcement Division
U. S. Environmental Protection Agency
1201 Elm Street
Dallas, TX 75270

Re: Report of Vinyl Chloride Emissions Compliance
Test

Dear Mr. Bergman:

Attached are two (2) copies of a report of a voluntary vinyl chloride emission test conducted on the oxychlorination reactor vents at PPG Industries, Inc.'s Lake Charles, Louisiana plant, February 13-15, 1979.

Very truly yours,

A handwritten signature in dark ink, reading "James E. Wyche III". The signature is written in a cursive style with a prominent "J" and "W".

JAMES E. WYCHE III
Coordinator Environmental Systems

JEW:as
Attachments

cc: Messrs. J. F. Coerver
Louisiana Air Control Commission

V. P. Wynne
PPG Industries, Inc.

bcc: W. J. Peard
H. Hoenes/M. Wood/T. Stubblefield
J. R. Farst/T. G. Brown/T. G. Taylor
G. Jordan/J. Hart

SL 071802

VINYL CHLORIDE COMPLIANCE TEST REPORT
OF OHC REACTOR VENTS

for

PPG Industries, Inc.
Chemical Division-U.S.
P. O. Box 1000
Lake Charles, LA 70602

Submitted to: The U. S. Environmental Protection Agency
1201 Elm Street
Dallas, Texas 75270

February 26, 1979

Company Official Responsible for Submitting Report: James E. Wyche, III
Coordinator
Environmental Systems

SL 071803

I. Introduction

PPG Industries, Inc., Lake Charles, Louisiana, facility includes units for the production of vinyl chloride and ethylene dichloride which are subject to NESHAP regulations on vinyl chloride (40CFR61). These regulations require (Paragraph 61.67) that emission testing be conducted to demonstrate compliance with the emission standards set forth therein. Testing conducted on January 8, 1979, and submitted to the U.S. Environmental Protection Agency demonstrated compliance during normal operating conditions. Normal operating conditions include incineration of gaseous and liquid hydrocarbon wastes from process units. This report is concerned with the oxychlorination ethylene dichloride (OHC) unit's ability to comply with paragraph 61.62(b) of the regulation standard for OHC reactors without benefit of incineration. After providing notice to the Regional Administrator of EPA Region VI, PPG conducted OHC reactor emission tests on February 13, 14, 15, 1979.

All sampling and testing were performed in accordance with procedures previously discussed with EPA Region VI representatives. Procedures are described in detail in this report. PPG personnel who were involved in conducting the test were: John Hart, Ty Stubblefield, Wayne Hebert, and Ken Findley. A representative of the EPA, Lucian Rarogiewicz, from Engineering Science, observed the sampling and testing of the OHC Reactor No. 3.

II. Abstract

This is a report of a voluntary emission test conducted by FPG Industries, Inc., on February 13, 14, 15, 1979, at its Lake Charles, Louisiana, oxy-chlorination ethylene dichloride (OHC) unit. The Lake Charles plant has demonstrated compliance in accordance with paragraph 61.67 of the NESHAP regulations on vinyl chloride, 40CFR61, during normal operation. This report is concerned with the OHC unit's ability to comply to vinyl chloride regulations in the event that the reactor vents are not incinerated. Each OHC reactor was operating at the maximum capacity attainable on the day it was tested.

<u>Date</u>	<u>Source</u>	<u>Operating Rate as Percent of Name Plate Operating Rate</u>
February 13, 1979	OHC Reactor No. 1	115%
February 14, 1979	OHC Reactor No. 3	95%
February 15, 1979	OHC Reactor No. 2	105%

Results of the emission test are summarized below:

<u>Source</u>	<u>NESHAP Standard (maximum allowed)</u>	<u>Test Results</u>
No. 1 OHC Reactor Vent, g VCM/kg EDC Produced	0.2	0.133
No. 2 OHC Reactor Vent, g VCM/kg EDC Produced	0.2	0.098
No. 3 OHC Reactor Vent, g VCM/kg EDC Produced	0.2	0.054

Compliance with the standard was demonstrated.

mfg. E. model. No. of: ORIFICE PLATE
TRANSMITTER
Flow Recorder

G.C.
G.C. Recorder
etc. etc. etc.

chain of custody

attached sketch of sampling system example print
probe To determine if probe