

SHOW CAUSE HEARING



BC: PAF

Conoco Chemicals
Continental Oil Company
P.O. Box 91, New Highway 25
Aberdeen, Mississippi 39730

April 23, 1979

Mr. James T. Wilburn
Chief, Air Enforcement Branch
United States Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, GA 30308

Dear Mr. Wilburn:

Pursuant to our conversation of April 11, 1979, we are submitting the attached list of measures currently being taken or in the process of implementation to reduce the potential for relief valve discharges at our Aberdeen Plant.

If you have any questions please call me at 601-369-8111, Ext. 235.

A handwritten signature in cursive script that reads "Curry L. Miller".

Curry L. Miller
Plant Manager

cjt

Attachment

c: Mr. Wayne B. Anderson, P.E.
Coordinator
Industrial Air Emissions Section
P. O. Box 827
Jackson, MS 39205

DTH 000082012

- ATTACHMENT

1. Additional high level alarms have been ordered and will be installed in the two fresh vinyl chloride receivers.
2. The process leads to the existing level instruments on the fresh VCM receivers will be heat traced and insulated.
3. Revisions to the standard operating procedure have been made to require termination of polymerization with the emergency kill system if the reactor pressure reaches 145 PSIG during production of 5385 grade resin.
4. Operating personnel are now required to wear self-contained breathing apparatus before starting the addition of nitric oxide to the reactor.
5. The emergency nitric oxide kill system has been pressure checked and it or any alternative kill system will continue to be pressure checked every six (6) months to assure the integrity and readiness of these systems.
6. The standard operating procedure has been changed so that after every coarse batch, the reactor condenser will be inspected to determine if it is plugged. If it is found to be plugged, it will be cleaned prior to charging the next batch in that reactor.
7. The standard operating procedure has been changed to require a reduction in initiator loading for any batch following a coarse batch in order to slow down the reaction rate.
8. A new relief valve has been ordered and will be installed to replace the valve which relieved prematurely.
9. Operator training sessions covering the standard operating procedures will be conducted on a formal basis once per year and for new employees during their initial orientation period.
10. A new rupture disc holder which can be assembled and pretorqued prior to installation has been ordered and will be installed beneath the relief valve on D-300 to minimize premature rupture disc failure.