

ON REVIEW OF RECORDS

NESHAPS INSPECTION FOR VINYL CHLORIDE EMISSIONS COMPLIANCE

Review Date 21, 22, 23 Feb 83

Reviewer's Name J. David Sullivan

Firm's Name PPG Industries

Firm's Address P.O. Box 1000 Lake Charles, LA 70602

EMISSION (STACK)

1. Review of hourly ☒ yes ☐ no average from continuous stack emission.
2. Number of stack emissions (continuous emissions for 1 hour or more) which exceeded limits specified in Sections 61.62, 61.63 and 61.64:

five

3. Were there additional emissions which were not properly and accurately reported in the appropriate Semi-annual Report?
☐ Yes ☐ No N/A will be covered in next^{Semi annual} report, see Atch #3
4. If the response to No. 3 is Yes, list date, time, emission point location, duration, estimated integrated emission, and the cause or causes of emission. (Attach sheets if more space is required.)

Date & Time	Location In Plant	Duration	Est. Integrated Emission	Cause or Causes	Action Taken
		<u>N/A</u>			

LEAK DETECTION SYSTEM

5. Review of (check one or more) ☒ hourly ☐ shift ☐ daily ☐ weekly ☐ monthly average from leak detection system.

* Data may be available from records on file at EPA Regional Offices.

6. Number of times one or more monitoring points indicated emission levels exceeded the value for the leak definition (See CHECKLIST 5 (d):

Too Numerous to Count in limited time.

7. List date, time, monitoring point location, duration, estimated integrated emission and the cause or causes of emission of those leaks in No. 6.
(Attach sheets if more space is required.)

Date & Time	Location In Plant	Duration	Est. Integrated Emission	Cause or Causes	Action Taken
For Spot check data See Attachment #4					
OHCI/TEII is not keeping records showing individual leak alarms only daily summaries. No times, duration, conc. or cause and action are listed.					

ATMOSPHERIC DISCHARGES

- 8* List information of emergency discharges to the atmosphere.

Date & Time	Location in Plant	Duration	Est. Integrated Emission	Cause or Causes	Inspector's Comments
9/14/82 5:45pm	SRV # 462469 Certain Tank Fill Line	40min	51 lbs.	Failure of RD below rated capacity use of improper O-ring for VMA service	Not Reported

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9. Determine from plant records whether temperature, pressure, flow rate(s) and/or other process variables and/or if equipment failures (i.e., reduced flow rate of cooling water, defective temperature controller, etc.) gave rise to the necessity of the emergency discharge(s) from PVC reactors. List the date, time, location in plant and the condition(s) which appear to have produced the need for an emergency discharge(s).

Date & Time	Location In Plant	Conditions
	N/A	

10. List the dates and time when similar or equivalent conditions existed as in No. 12 and for which an emergency discharge was not reported.

Date & Time	Location In Plant	Conditions
	N/A	

11. Review the leak detection records of those monitoring points nearest the location(s) and down stream in No. 13 on those dates and times where conditions existed which appear to give rise to the necessity of emergency discharge. List date, time, location in plant and the emission levels of the nearest monitoring points.

Date & Time	Location In Plant	Emission Level of Monitoring Points			
		N/A			

12. List the date, time, location in plant from the tabulation in No. 14 where the owner/operator appears not to be in compliance with the NESHAPS vinyl chloride standard and its amendments.

Date & Time	Location In Plant	Inspector's Comments
		N/A

REACTOR OPENING LOSS

- 13* Review analytical records of vinyl chloride concentration in reactor vapor space to determine "reactor opening loss" of reactor (and stripper where applicable), prepolymerization and post polymerization vessels. List date, vessel identification, and batch identification where emissions exceeded standard.

Date	Vessel Identification	Batch Identification	Inspector's Comments
	NONE		

RESIN, SLURRY, WET CAKE AND LATEX SAMPLING

- 14* Review analytical records of vinyl chloride concentration in polyvinyl chloride resin, slurry, wet cake and latex to determine the weighed average residual vinyl chloride concentration in all grades of polyvinyl chloride resin processed through the stripping operation on each calendar day. List date, vessel identification, and batch identification where emissions exceeded standard.

Date	Vessel Identification	Batch Identification	Inspector's Comments
	N/A		

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