

CERTIFIED MAIL # 241 411 211
RETURN RECEIPT REQUESTED

December 15, 1987

*File: LESHAP
482L*

VISTA

Tom Coerver
Dept. of Environmental Quality
Air Quality Division
P O Box 44066
Baton Rouge, LA 70804

Dear Mr. Coerver:

The following is a quarterly report of vinyl chloride emissions for the Vista Chemical Company VCM Plant in Westlake, Louisiana submitted in accordance with Section 77.11 of the Louisiana Emission Standards for Hazardous Air Pollutants (LESHAP). This report covers the period beginning September 1, 1987 and ending November 30, 1987.

1) Oxychlorination Reactors

The vinyl chloride emission limit of 0.2 gram/kilogram of EDC produced, as prescribed in paragraph 77.3(b) of LESHAP, was not exceeded.

2) Steam Stripper

The vinyl chloride concentration of the process wastewater exposed to atmosphere did not exceed the limit of 10 ppm as prescribed in paragraph 77.6(b) (9) (i) LESHAP.

3) Slops Caustic

The vinyl chloride concentration of the slops caustic exposed to atmosphere did not exceed the limit of 10 ppm as prescribed in paragraph 77.6(b) (9) (i) LESHAP.

4) Thermal Incinerator

All major vent streams at the plant are routed to the Incinerator Unit to reduce the vinyl chloride content to less than 10 ppm. The vinyl chloride concentration in the gases exiting the Incinerator Stack is continuously monitored except during

calibration or repair. The Incinerator stack gas analyzer used for this purpose experienced 270 minutes downtime, excluding calibration time. During the reporting period, no exceedance of the three hour average 10 ppm vinyl standard occurred at the incinerator stack.

The Incinerator was down or various feed gases were bypassing the Incinerator as described below.

September 11, 1987

The Wet and Dry Vents bypassed the on-line Incinerator A for 20 minutes beginning at approximately 0100 hours on September 11, 1987. At the time of the bypass, the main plant was operating at a 2.1MM lbs. per day rate and tank car loading was not in progress.

The bypass occurred due to a sudden increase of flow in the Dry Vent Header. The increased flow was caused by the automatic opening of the safety shutoff valves on the vinyl loading recovery vent line. The valves had shut in response to a high level in the vinyl receiver tank, T-491, thereby preventing vents from the vinyl loading vent recovery system from getting to the incinerator. Once the valves were shut, the pressure began to increase upstream of the valves. When the level began to drop in T-491, the valves opened automatically and vented to the incinerator.

The bypass condition was eliminated when the operator switched the vents to the stand-by Incinerator B. Approximately 71 lbs. of vinyl chloride were emitted to the atmosphere. A call was made to the National Response Center but when the tape was played, the conversation was inaudible. Therefore, no telephone transcripts are attached.

October 28, 1987

The Dry Vent bypassed the on-line Incinerator B for 15 minutes beginning at approximately 0950 hours on October 28, 1987. At the time of the bypass, the main plant was operating at a 2.23MM lbs. per day rate and tank car loading was not in progress.

The bypass occurred during the installation of an Uninterruptible Power Source (UPS) at the on-line Incinerator B. The instrumentation required to operate the on-line Incinerator B was required to have been switched to power sources that would not be affected by the implementation of the UPS System. However, the Flame Arrestor shutdown system was not

switched to the proper power source. The Flame Arrestor shutdown valves then closed when the normal power was cut off to connect the UPS system. The closing of the Flame Arrestor shutdown valves caused the Dry Vent Header pressure to increase to the point where the rupture disc on the Dry Vent bypass line relieved.

The bypass condition was eliminated by blocking in the blown rupture disk and switching the on-line Incinerator B back to normal power. Approximately 0.9 lbs. of vinyl chloride were emitted to the atmosphere.

November 27, 1987

The Wet and Dry vents bypassed the on-line Incinerator A for 1 second beginning at approximately 1725 hours on November 27, 1987. At the time of the bypass, the main plant was operating at a 2.34MM lbs. per day rate and tank car loading was not in progress.

The bypass occurred due to a sudden increase of flow in both the Wet and Dry Vent Headers. The increased flow was caused by depressuring the Bauxite Dryer, S-402, and purging three railcars at the same time.

The bypass condition was eliminated when the vent from S-402 was blocked in and railcar purging was stopped. Approximately 0.09 lbs. of vinyl chloride were emitted to the atmosphere.

5) HCl Column

Emergency venting of the overhead vapor (>10 ppm vinyl chloride) from the HCl Column (C-202) occurred once during this reporting period, as described below.

September 30, 1987

The overhead of the HCl Column was vented due to an automatic safety shutdown of the Oxychlorination Unit. The vented material passed through the HCl Absorber of the off-line (not receiving normal vent streams) Incinerator train from 1400 to 1442 hours with an initial flow also exiting through the C-500 vent stack from 1400 to 1405 hours. Approximately 0.13 lbs. of vinyl chloride were released.

Since Vista has interpreted that the upper section of the HCl Column is not in vinyl chloride service (>10% vinyl chloride) this incident is not covered by LESHAP but is reported in accordance with the Consent Decree and Compliance Plan entered with the United States Court for the Western District of Louisiana on August 19, 1985 in Civil Action No. 83-2518.

If you have any questions concerning this report contact E. R. Taylor, Environmental Coordinator, at (318) 494-5031.

Sincerely,



R. A. Conrad
VCM Plant Manager

br

bcc: JAD PEM (GEH-WPS) (JGC-SCR) WLM JCL MGH ERT BJH

~~_____~~
This is Ed Taylor, and the following is a recording of a telephone conversation to the National Response Center at 1400 hours on September 16, 1987.

(Tape inaudible.)

VVV 000002815