



WINSTON R. DAY
SECRETARY

AIR QUALITY DIVISION

GUSTAVE VON BODUNGEN
ADMINISTRATOR

February 27, 1984

Mr. Bruce J. Brocka
Personnel and Safety Manager
Certainteed Corporation
Pipe and Plastic Group
Post Office Box 253
Sulphur, Louisiana 70663

Dear Mr. Brocka:

We have reviewed the results of the Monitor Certification Test performed by Certainteed Corporation between the dates of January 21 through 26, 1984. These results indicate that Certainteed's vinyl chloride monitor has met all of the performance specifications and has been determined to be equivalent to annual emission testing required by Section 77.8 (a)(1) of the LESHAP regulations.

This certification shall remain in effect until the system is removed, modified or if there is reason to believe that the performance specifications are not being met.

If you have any questions, please contact Ms. Mary Wright of my staff.

Sincerely,

Gustave Von Bodungen
Program Administrator

GVB:MW:jcp

cc: Bill Davis, Act. Chief
NESHAP Unit

Southwest Regional Office
Lake Charles, La.

CTL000107

CertainTeed Corporation
Pipe & Plastics Group
P.O. Box 253
Sulphur, LA 70663
(318) 882-1441

January 30, 1984

Certified Mail
Return Receipt

Mr. Gustave Von Bodt
Program Administrator
Department of Natural Resources
Office of Environmental
Air Quality Division
P.O. Box 44066
Baton Rouge, LA 70804

Dear Mr. Von Bodungen:

CertainTeed Corporation has complied with the Annual Stack Emission Test requirements by using the Department of Natural Resources Equivalent Performance Specification Test of September 13, 1983.

Below is the table of performance specifications and results:

Parameter	Specification	CertainTeed Results
Conditioning Period	96 Hours	Met specification
Operational Test Period	96 Hours	Met specification
Calibration Error	5%	Span 1.17%
Response Time	10 minutes	East Unit 11 min West Unit 15 min
Calibration Drift (2 Hour)	0.5 ppm	0.03 ppm zero 0.05 ppm span
Calibration Drift (24 Hour)	1.0 ppm	0.20 ppm zero 0.34 ppm span
Resolution Recorder Chart Data Printer	0.05%fs 0.1 ppm	N/A Met specification
Relative Accuracy	0.5 ppm	0.37 ppm

CTL000108

RETURN RECEIPT

SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following services are requested (check one):
☐ Show to whom and date delivered
☐ Show to whom, date, and address of delivery
☐ RESTRICTED DELIVERY
 (The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

3. ARTICLE ADDRESSED TO:
Gus Von Bodungen
Jan 30, 1984 Civil Report

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED MAIL ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
P4465218

5. I have received the article described above.
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 DATE OF DELIVERY Jan 30 1984

6. ADDRESSEE'S ADDRESS (only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

POSTMARK
JAN 30 1984
may be on reverse also

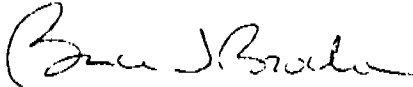
* GPO: 1983-578-903

Attached are Figure 3.1a, Figure 3.2a, Figure 3.3 (east unit), Figure 3.3 (west unit), and auto zero test chart 1 outlining the data recorded during the testing period.

Data is not provided for midrange gas test parameters. This portion of the test has not been successfully completed but it is anticipated that this will occur by February 4, 1984. Results for this portion of the test will be sent to the Department of Natural Resources at that time.

If there are any questions about the test or data, do not hesitate to call me.

Sincerely,



Bruce J. Brocke
Personnel/Safety Manager

jw

Enclosure

cc: CAG

CTL000109

FIGURE 3.1a

LAKE CHARLES POLYMER PLANT

ZERO AND CALIBRATION DRIFT (2 HOUR)

TEST NO.	TIME BEGIN	TIME END	DATE	ZERO READING	ZERO DRIFT* (DELTA)	SPAN READING	SPAN DRIFT* (DELTA)	CALIBRATION DRIFT (DELTA)
1	0200	0400	12-25	.06	0.00	9.95	.03	.03
2	0400	0600	12-25	.00	.08	10.09	.14	.08
3	0600	0800	12-25	.00	.00	10.09	.00	.00
4	0800	1000	12-25	.00	.00	9.93	.11	.11
5	1000	1200	12-25	.00	.00	10.31	.32	.33
6	1200	1400	12-25	.13	.13	10.34	.03	-.10
7	1400	1600	12-25	.13	.00	10.37	.03	.03
8	1600	1800	12-25	.00	.13	10.25	.11	-.03
9	1800	2000	12-26	.02	.02	10.48	.22	.20
10	2000	2200	12-26	.00	.02	10.20	.10	.15
11	2200	2400	12-25	.00	.00	10.35	.06	.05
12	0200	0300	12-27	.00	.00	10.51	.15	.15
13	0300	0400	12-27	.11	.11	10.53	.05	-.09
14	0400	0500	12-27	.00	.11	10.54	.03	-.08
15	0500	0600	12-27	.03	.03	10.54	.13	.04

* ABSOLUTE VALUE

ZERO DRIFT = MEAN ZERO DRIFT .05 + 01 (ZERO) .03
 ZERO DRIFT = .08

CALIBRATION DRIFT = MEAN SPAN DRIFT .11 + 01 (SPAN) .05
 CALIBRATION DRIFT = .16

CTL000110

FIGURE 3.2a

LAKE CHARLES POLYMER PLANT

ZERO AND CALIBRATION DRIFT (24 HOUR)

	1983	ZERO	ZERO	SPAN	SPAN
	DATE	READING	DRIFT*	READING	DRIFT*
		(DELTA)		(DELTA)	
AFTER CAL	12-21	.00		9.85	
BEFORE CAL	12-22	.01	.01	9.65	.21
AFTER CAL	12-22	.01		9.85	
BEFORE CAL	12-23	.06	.05	9.80	.05
AFTER CAL	12-23	.00		9.80	
BEFORE CAL	12-24	.04	.03	9.52	.28
AFTER CAL	12-24	.00		9.86	
BEFORE CAL	12-25	.19	.19	10.05	.19

* ABSOLUTE VALUE

MEAN ZERO DRIFT = .06
 CI (ZERO) = .14
 ZERO DRIFT = .20

 MEAN SPAN DRIFT = .18
 CI (SPAN) = .15
 CALIBRATION DRIFT = .34

CTL000111

FIGURE 3.15

LAKE CHARLES POLYMER PLANT

RELATIVE ACCURACY (24 HOUR)

1993 DATE	ISSON VALUE BEFORE CALIBRATION	THEORETICAL (VALUE)	ACC'Y (DELTA**)
12-22	9.65	9.80	.15
12-23	9.80	9.80	.00
12-24	9.82	9.80	.02
12-25	10.85	9.80	.25

* NIS TRACEABLE

** ABSOLUTE VALUE

RELATIVE ACCURACY = MEAN ACC'Y + CI (ACC'Y)

MEAN ACC'Y = .17

CI (ACC'Y) = .00

RELATIVE ACCURACY = .07

CTL000112

FIGURE 3-3 RESPONSE
EAST UNIT

Date of Test: January 26, 1984

Span Gas Concentration: 9.76 ppm

Response:

A. Upscale

1. 3 cycles

2. 4 cycles

3. 9 cycles

Average 5 cycles X cycle time: 60 sec/cycle

= Average upscale response time: 319 sec.

B. Downscale

1. 3 cycles

2. 2 cycles

3. 2 cycles

Average 2 cycles X cycle time: 60 sec/cycle

= Average Downscale response time: 140 sec.

^A Change gases at the same time the GC injects the sample.

CTL000113

FIGURE 3-3 RESPONSE
WEST UNIT

Date of Test: January 26, 1984

Span Gas Concentration: 9.76 ppm

Response:

A. Upscale

1. 4 cycles

2. 5 cycles

3. 5 cycles

Average 5 cycles X cycle time: 60 sec/cycle

= Average upscale response time: 279 sec.

B. Downscale

1. 4 cycles

2. 4 cycles

3. 5 cycles

Average 4 cycles X cycle time: 60 sec/cycle

= Average Downscale response time: 260 sec.

^A Change gases at the same time the GC injects the sample.

CTL000114

12-20-83
AUTORETEST

1700

✓ 8.44
✓ 8.44

100

2-5

CTL000115



FRANK P. SIMCNEAUX
SECRETARY

B. JIM PORTER
ASSETANT SECRETARY

DEPARTMENT OF NATURAL RESOURCES
OFFICE OF ENVIRONMENTAL AFFAIRS
AIR QUALITY DIVISION
September 13, 1983

GUSTAVE VON BODUNGEN
PROGRAM ADMINETRATOR

Mr. C. A. Gellner
Plant Manager
CERTAINTED Corporation
P. O. Box 253
Sulphur, Louisiana 70663

Dear Mr. Gellner:

As you are aware, on June 20, 1983, the State of Louisiana promulgated regulations governing facilities which produce vinyl chloride, polyvinyl chloride and ethylene dichloride by oxychlorination. These regulations require the owner or operator of a vinyl chloride source to test emissions from the source on an annual basis using Test Method 106.

In order to minimize the necessity of annual stack testing, but at the same time provide adequate assurance of compliance with the emission limits, the Air Quality Division has developed a set of guidelines for vinyl chloride monitor certification. Facilities wishing to be relieved of the annual stack test requirement may be granted, upon written request, an equivalent monitor certification provided that the attached test procedures are followed and all performance specifications are met.

Certified vinyl chloride monitors shall be deemed equivalent to the annual emissions testing required by Section 77.8(a)(1) of the Louisiana Air Quality Regulations. A certification can not be used in place of an initial stack test on a new or modified source which has not been previously tested by Method 106. Vinyl chloride monitors which meet all performance specifications shall remain certified until the system is removed, modified, or if there is reason to believe that the performance specifications are not being met.

Be reminded that the equivalent performance specification test or Method 106 stack test must be completed prior to expiration of the extended compliance test period.

Should you have any questions concerning this matter, please contact Greg Gasperecz at (504) 342-1206.

Sincerely,

Gustave Von Bodungen
Gustave Von Bodungen
Program Administrator

GVB/WTN/bs

cc: Greg Gasperecz
Capitol Regional Office
Southwest Regional Office
Southeast Regional Office

CTL000116

CertainTeed Corporation
Pipe & Plastics Group
P.O. Box 253
Sulphur, LA 70663
(318) 882-1441

CertainTeed 

May 1, 1986

John Amspaugh
Trans Tank Car Corporation
PO Box 960
Fordce, Arkansas 71742

ATTENTION: PLANT MANAGER/GENERAL MANAGER

RE: MATERIAL SAFETY DATA SHEET (MSDS)

PLEASE ATTACH PARTICULAR IMPORTANCE TO THIS LETTER

Enclosed is the Material Safety Data Sheet for the PVC Polymer that your company recently received from CertainTeed Corporation. This product and its code number is:

CERTAVIN™ CT-1110

This letter is directed to you as our official contact for your company. If someone other than yourself is responsible for the safe handling and use of our product, please see that this person receives this form. We would also appreciate it if you would forward to us that individual's full name, title, and mailing address. In the future, we may have occasion to update this Material Safety Data Sheet with significant new information. In such a case, we would want to forward the revised sheet to the proper person.

Thank you for your cooperation. We value your business highly, and will continue to make every effort to provide you the information you need to use our product safely.

Sincerely,



Bruce J. Brocka
Technical Supervisor

BJB:srf

Attachment

CTL000117

1993 VCSA MEETING AGENDA
San Antonio, Texas

THURSDAY, OCTOBER 7, 1993

<u>TIME</u>	<u>SUBJECT</u>	<u>SPEAKER</u>
08:00-0810	Welcome & Introduction	Herm Waltemate, GEON
08:10-08:15	Program Activities	Burley Melton, Formosa
08:15-09:45	"True Confessions"	
	VCM Sphere Emission	David Hart, EVC
	Quench Column Pump Failure & Fire	Bill Higgins, OxyChem
	Caustic Burn	Steve Williams, GEON
	Back Hoe Accident - Near Miss	Bob DesJardins, GEON
	Sulfur in Fuel Gas Yields Corrosion	? , DOW
	Open for Additional Incident Discussion	
09:45-10:00	Confined Space Practices	Larry Fauchaux, OxyChem
10:00-10:15	Break	
10:15-10:30	PVC Superfund Remediation	Lou LaCorte, Formosa
10:30-11:00	Process Safety Mgt/Auditing/Legislation	David Middleton, Norsk Hydro
11:00-11:45	APME Meeting, Topics Review & Summary	(?)J. Stuij, AKZO
13:15-14:30	<u>Questionnaire Review & Discussion</u>	
	PVC Labeling	Herm Waltemate, GEON
	Cracker Section Safety Devices	David Hart, EVC
	Safety & Health - VCM/EDC/PVC Plants	? ,PEQUIVEW
	VCM Gas Holder Safety	? ,EKO
	Reserved For Additional Questions	
14:30-1500	European Regulatory, Update	David Hart, EVC
15:00-15:15	Break	
15:15-15:30	U.S.A. Regulatory (OSHA,EPA) Update	Need Speaker
15:30-15:45	By-Product Recycle (BPR)	Tom Snow, EVC, USA
	Process for Chlorinated Waste Streamers	
	<u>Open Forum</u>	
15:45-17:00	Cartridge Masks suitable for VCM Exposure	David Hart, EVC
	Incolloy Cracker Tube Problem	David Hart, EVC
	Freon (CFC) Replacements	Need Speaker
	Fire Retardant Clothing use, Pro & Con	Need Speaker
	Fugitive Emissions	(?) J.P.Bindelle, Solvay
	Personnel Monitoring	(?) J. Stuij, AKZO

FRIDAY, OCTOBER 8, 1993

<u>TIME</u>	<u>SUBJECT</u>	<u>SPEAKER</u>
08:00-08:30	Treasurer's Report, Election of Officers, 1994 Site Selection	VCSA Officers
08:30-09:00	Industry Response to Greenpeace Initiatives	Don Goodman, OxyChem
09:00-09:15	US & European Agency Enforcement Actions	U.S. Speaker Needed
		European Speaker Needed
09:15-09:30	VCM Storage pressurized vs Refrigerated	? ,DOW
09:30-09:45	ASL Update	
09:45-10:00	Break	
10:00-10:30	"SAFETY-Getting More With Less"	Bob DesJardins-GEON
10:30-10:45	Crisis Training Exercises	Speaker Needed
10:45-11:00	Reuse of Waste Water	? ,DOW
11:00-11:15	Future Program Topics	Burley Melton, Formosa
11:15-11:45	Vinyl Institute Presentation	? ,Vinyl Institute
11:45-12:00	Closing Remarks	Herm Waltemate, GEON

Proposed Schedule for 1991 VCSA Annual Meeting

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Thursday, ? , 1991

Time	Subject	Speakers
08:00 - 08:15	Introduction/Announcements	J. Sommermann Formosa Plastics
08:15 - ?	Case Studies/True Confessions (Fill in Schedule with selected topics)	TBD ?
10:00 - 10:15	Break	
10:15 -	(Fill in Schedule with selected topics)	?
12:00 - 13:15	Lunch	
13:15 -	(Fill in Schedule with selected topics)	?
15:00 - 15:15	Break	
15:15 - 15:30	United States Regulatory Update	TBD
15:30 - 15:45	European Regulatory Update	TBD
15:45 - 16:00	Survey on State/Federal Enforcement	TBD
16:00 - 16:30	Vinyl Institute Update	R. Gottesman
16:00	Adjournment	

Friday, ? , 1991

Time	Subject	Speakers
08:00 - 08:30	Treasurer's Report Election of 1992 Officers Selection of 1992 Meeting Site	J. Sommermann Formosa Plastics
08:30 - 10:00	ASL Registry Update	Dr. Drumwaite
10:00 - 10:15	Break	Vista Chemical
10:15 -	(Fill in Schedule with selected topics)	
12:00	Adjournment	

CTF000119

1991 Vinyl Chloride Safety Association Annual Meeting

Program Questionnaire

Hello! My name is Jeffrey Sommermann from Formosa Plastics Corporation, and I am co-program chairman for our 1991 meeting in Denver, Colorado. Below are suggested topics for the agenda for the 1991 meeting. I am looking for feedback on these topics and for volunteers to speak on any of these topics, on any other subjects that you may suggest. Please take a minute to review this questionnaire and return it to me by January 30, 1990, at the following address:

Jeffrey H. Sommermann
Plant Manager
Formosa Plastics Corporation Delaware
P.O. Box 320
Schoolhouse Road
Delaware City, Delaware USA 19706

<u>Suggested Topics</u>	<u>Is Topic of Interest/ Would You Present It?</u>
1. Impact of new Clean Air Act on PVC and VCM Industries	_____
2. Health risks of long term exposure to PVC dust/dust control programs (examples)	_____
3. Should females be allowed to work in VCM environment if pregnant - can a company ban females from the workplace to protect an unborn fetus? (Supreme Court case)	_____
4. Experiences with IGSCC in stainless steel vessels in VCM service	_____
5. VCM pressure vessel rupture disc and relief valve inspection/testing programs	_____
6. Impact of Total Quality Management/Statistical Process Control (SPC) programs on safety and environmental compliance (examples)	_____
7. Experiences with voluntary toxic air emissions reductions	_____
8. SARA Title III fugitive emissions leak rate surveys to reduce reported emissions	_____
9. Plant environmental/safety audits - regulatory required vs. in-house	_____
10. Update on impact of TCLP/TOC regulations, including case studies on TCLP waste compliance	_____
11. Review of design/process changes - operability, maintainability, and safety audits a. Updating of P&ID's, operating procedures, operator training	_____
12. SOCCA industry wide training and certification program for chemical process operators	_____
13. Process safety/HAZOP process reviews	_____
14. New OSHA standard on process safety management, "Process Safety Management of Highly Hazardous Chemicals"	_____
15. Chemical process safety rules for hotwork training, confined space entry, and vessel entry (examples)	_____
16. Contractor safety administration - how to set up a good contractor safety program (examples)	_____
*Does your company utilize contract maintenance? yes ___ no ___	
17. Examples of successful employee safety training programs	_____
*Does your company utilize a safety training video? yes ___ no ___	
*If yes, would you be willing to show it? yes ___ no ___	

<u>Regularly Scheduled Topics</u>	<u>Would You Present It?</u>
1. U.S. Regulatory update	_____
2. European Regulatory update	_____
3. Survey on State/Federal enforcement	_____

Comments:

Name:

Company:

Address:

Telephone Number:

CTL000120