



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI
1201 ELM STREET
DALLAS, TEXAS 75270

RECEIVED

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED #P21 1423934

Mr. J.A. DeBernardi
Plant Manager
Conoco Chemicals Company
A Division of Conoco Inc.
P.O. Box 605
Westlake, Louisiana 70669

RE: National Emission Standards for Hazardous Air Pollutants (NESHAP)
Standards to Construct Vinyl Chloride Sources, 40 CFR Part 61,
Subparts A and F.

Dear Mr. DeBernardi:

My staff has completed a review of your application dated February 5, 1980, and additional information by letter of April 8, 1980, which were submitted for approval to construct a proposed expansion of existing facilities that are subject to the NESHAP standard for vinyl chloride (VC). Specifically, your application proposes to construct an expansion of the existing ethylene dichloride (EDC) - vinyl chloride monomer (VCM) production facilities of Conoco Chemicals Company which are located in Westlake, Louisiana. Your application was submitted as required by 40 CFR, §61.07 (NESHAP).

Based on the information received in your application and the additional information of April 8, 1980, we have determined that the expanded EDC-VCM facilities of your proposal will not cause emissions in violation of the NESHAP standard for VC in Title 40, Code of Federal Regulations (CFR) Part 61, Subpart F. I am hereby approving your application to construct an expansion of the EDC-VCM facilities at your existing plant. Approval of the Leak Detection and Elimination Program, which was submitted with your application for the expansion, will be resolved after we have conducted an on-site inspection of the new facilities.

Since you did not request any equipment equivalencies or alternatives, as provided by 40 CFR, §61.66, this approval is premised upon Conoco Chemicals Company complying with the applicable equipment requirements of 40 CFR Part 61, Subpart F. Any further revision to the approved plans and specifications which may affect the amount of VC emitted to the outside air, or any planned deviation from the specific equipment identified in the regulations, must receive prior approval.

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The expanded EDC-VCM facilities, which you have proposed, are required upon startup to fully comply with 40 CFR Part 61, Subpart F.

40 CFR, §61.09(a)(1) requires that you give us notification not more than 60 days nor less than 30 days prior to the anticipated date of initial startup of the expanded EDC-VCM facilities. 40 CFR, §61.09(a)(2) requires that you also give us notification within 15 days after the actual date of startup. Upon startup, you are required to have installed and in operation continuous monitoring equipment for applicable vents of VC emissions, as required by §61.68. You are also required to test emissions within 90 days after initial startup, pursuant to §61.67. In order to comply with the requirements of §61.69, you are also required to submit an initial report for the expanded facilities within 90 days after the initial startup. Your first semiannual report on the expanded EDC-VCM facilities to be submitted with 180 days of the initial startup date, as required by §61.70(b)(2).

This approval to construct does not relieve you of the legal responsibility to comply with the vinyl chloride NESHAP emission standards and all other applicable requirements of 40 CFR Part 61. It also does not relieve you of the responsibility for compliance with any other applicable provisions of federal, state, or local law or regulations. Further, it does not limit any action which this agency could take to implement or enforce air pollution requirements, including those required to prevent imminent and substantial endangerment to health.

Should you have any technical questions concerning the substance of this letter and approval, you may contact Martin E. Brittain, P.E. of my staff at (214) 767-2755. Any legal questions should be addressed to Paige Murphy of my staff at (214) 767-2760

Sincerely,



Diana Dutton, Director
Enforcement Division (6AE)

cc: Mr. B. Jim Porter
Assistant Secretary
Office of Environmental Affairs
Department of Natural Resources
P.O. Box 44396
Baton Rouge, Louisiana 70804

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