

DEC 9 1974

SUBJECT: 1) Communications from the
La. Air Control Staff

2) Revised Air Compliance
Schedule for submittal
to State

TO: Mr. J. M. DeVoe

In your review and disposition of the attached subject matter, please consider the following:

- 1) We have informal information from the Commission Staff to the effect that any revised compliance schedule extending beyond the Federal deadline of May 31, 1975, will not be submitted to the Commission for approval. Such schedule will be forwarded to EPA in Dallas where the company will be declared in violation and wind up with some litigation and a negotiated deal.
- 2) We thought it best to await further confirmation of vinyl in the Heads Column Vent 2 and in the Lights Column Vent 17 by future stack sampling before injecting same in our revised compliance program at the present time.
- 3) A local PE-1 has been written toward an appropriation request for a condenser on the direct chlorination vent. This would recover EDC which is now vented to the HCl absorption pond and flare when the oxyhydrochlorination unit is down. We are not making this a part of the revised compliance program at the present time because we are not sure of appropriation approval.
- 4) Should we delete plan 4 from the timetable and state reasons for same being the soda ash section is scheduled to be shut down in 1977. We estimate this plan to cost in the range of \$100,000 - \$150,000.

Please advise.

P. B. Cornell, Manager
Baton Rouge North Works

1 PT/AJL:cf

Attach.

cc: Mr. E. E. James
Mr. T. D. Kent
Mr. A. J. von Frank

T. D. K.
DEC 9 1974



Industrial Chemicals Division

ALLIED CHEMICAL CORPORATION

P.O. Box 271, Baton Rouge, Louisiana 70821

(504) 356-3341

Mr. James Coerver
Technical Secretary
Louisiana Air Control Commission
P. O. Box 60630
New Orleans, La. 70160

Dear Mr. Coerver:

As per your letter of November 8, 1974 and further communications by our Environmental Control Section with Mr. Atley Brasher in your Technical Section, we are submitting herewith a revised compliance schedule for your approval.

The compliance schedule in question was approved at the June 6, 1974 public hearing of the Louisiana Air Control Commission. This approval covered the following:

- 1) Inorganic plan originally submitted August 23, 1972 (revised 1/25/74).
- 2) Hydrocarbon plan originally submitted 10/10/73.

The reasons for delay in meeting our original timetable and for the extended nature of the presently revised timetable are as follows:

- 1) Required additional engineering study and decisions to expand the vinyl chloride monomer systems to meet the more stringent OSHA regulations.
- 2) There was an overload of other environmentally related work, including OSHA and water pollution control, *while at the same time we*
- 3) ~~Experienced a shortage of engineering personnel.~~
- 4) Experienced slow delivery of equipment and materials of construction and expect more of same.

Very truly yours,

P. B. Cornell, Manager
Baton Rouge North Works

FWH:et

ASI 00005901

REVISED COMPLIANCE SCHEDULE TIMETABLE
ALLIED CHEMICAL CORPORATION - BATON ROUGE NORTH WORKS
NOVEMBER 25, 1974

PLAN 1 - Design and install new dust collecting system on lime kilns discharges and conveyors.

	<u>Status</u>	<u>Timetable</u>
Preliminary Engineering	In progress	2/1/75
Appropriation Request	In progress	2/15/75
Appropriation Approval	-	4/1/75
Complete Engineering	-	4/15/75
Complete Purchasing	-	5/1/75
Material & Equipment Delivery	-	9/1/75
Complete Installation	-	11/1/75
Start Operation	-	12/1/75

PLAN 2 - Purchase and install an improved bag dust collector system to replace present one in No. 4 elevator tower in soda ash section. (Similar actions on Nos. 1 and 3 elevator towers have been completed).

Preliminary Engineering	Completed	-
Appropriation Request	Completed	-
Appropriation Approval	Completed	-
Complete Engineering	-	12/15/74
Complete Purchasing	-	12/15/74
Material & Equipment Delivery	-	1/1/75
Complete Installation	-	3/1/75
Start Operation	-	4/1/75

PLAN 3 - Purchase and replace four (4) bag dust systems in dense ash operating systems.

Installation of three (3) of these bag dust collector system have been completed. The remaining system will be made a part of Plan 4 (below).

PLAN 4 - Design and install dust collecting systems on soda ash loadings into trucks and rail cars.

Preliminary Engineering	Completed	-
Appropriation Request	In Progress	4/15/75
Appropriation Approval	-	7/15/75
Complete Engineering	-	9/1/75
Complete Purchasing	-	9/15/75
Material & Equipment Delivery	-	3/15/76
Complete Installation	-	9/15/76
Start Operation	-	10/15/76

Plan 5 - Design and install a vapor recovery system for vinyl chloride monomer vapor.

	<u>Status</u>	<u>Timetable</u>
Preliminary Engineering	Completed	-
Appropriation Request	Completed	-
Appropriation Approval	Completed	-
Complete Engineering	-	3/31/75
Complete Purchasing	-	4/30/75
Material & Equipment Delivery	-	4/30/76
Start Installation	-	5/31/76
Complete Installation	-	8/31/76
Start Operation	-	10/31/76

Installation of Quench Column Vent.

This vent will be put through the proposed VCM vapor recovery system. It will thus be a part of the preceding Plan 5.

Plan 7 - Install condenser on Vent 2 exiting the heads column.

Preliminary Engineering	Completed	-
Appropriation Request	Completed	-
Appropriation Approval	Completed	-
Complete Engineering	In Progress	12/31/74
Complete Purchasing	In Progress	12/31/74
Material & Equipment Delivery	In Progress	5/31/75
Start Installation	In Progress	5/31/75
Complete Installation	-	9/30/75
Start Operation	-	10/31/75

Plan 7A- A pressurized, condensate storage will be required in the preceding Plan 7, but due to slow delivery, a currently available regular storage tank will be substituted and then replaced under this plan 7A.

Preliminary Engineering	-	4/30/75
Appropriation Request	-	5/31/75
Appropriation Approval	-	7/31/75
Complete Engineering	-	8/31/75
Complete Purchasing	-	9/30/75
Material & Equipment Delivery	-	12/31/76
Start Installation	-	1/31/77
Complete Installation	-	4/30/77
Start Operation	-	5/31/77

Plan 8 - Install condenser on vent 17 exiting the lights column.

Preliminary Engineering	Completed	-
Appropriation Request	In Progress	3/31/75
Appropriation Approval	-	5/31/75
Complete Engineering	-	9/30/75
Complete Purchasing	-	10/31/75
Material & Equipment Delivery	-	10/31/76
Start Installation	-	5/31/77
Start Operation	-	6/31/77

PLAN 9 - Modify caustic scrubber piping to make use of the proposed VCM vapor recovery system given in the preceding Plan 5.

This vent will be put through the proposed VCM vapor recovery system. It will thus be a part of the preceding Plan 5.

Louisiana Air Control Commission

State Office Building

Phone (504) 527-5119



P.O. Box 60630

New Orleans 70160

November 18, 1974

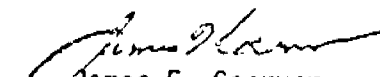
Mr. P. B. Cornell
Manager
Allied Chemical Corp. (North Works)
P. O. Box 271
Baton Rouge, LA 70821

Dear Sir:

A review of our files indicates that some "increments of progress" listed in your compliance schedule were scheduled for completion during the past month. Please inform this office of the status of these increments of progress by using the attached form. If any of these increments have not been accomplished by the scheduled date, please submit a revision to the compliance schedule reflecting the projected date the increments will be accomplished, as well as the final date for compliance and the reasons for the delay.

Your cooperation in providing this information will be appreciated. If you have any questions, please contact Mr. Atly Brasher of our staff at 504/527-5119.

Very truly yours,


James F. Coerver
Technical Secretary

AB:jad
Enc.

cc: Mr. H. Ledet, S.E. Regional Office

RECEIVED
BATON ROUGE
NORTH WORKS

NOV 19 1974

PRC	
PROD.	
JMCN	
JAS	
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AJL	☒
HPS	
KLS	

ASI 00005905

LOUISIANA AIR CONTROL COMMISSION

This report is necessary to keep this office informed of progress industries have made toward completion of their compliance schedules. It also serves to keep this office informed of difficulties industries are having in meeting their increments of progress.

Any explanation of the reasons for the delays in accomplishing increments are not required with this report. These should be included with the semiannual report and the compliance schedule revisions.

A revised compliance schedule should be submitted whenever there is a change in the date of an increment of over 30 days. These compliance schedule revisions have to be approved by the Air Control Commission and then submitted to the Environmental Protection Agency before becoming an official part of a company's compliance schedule.

Please fill out below and return to the Air Control Commission within 10 days of receipt.

INCREMENTS OF PROGRESS REPORT FORM

MONTH: OCTOBER COMPANY NAME: ALLIED CHEMICAL CORP. (NORTH WORKS), Baton Rouge, La.

[illegible]

Completed by: _____

ASI 00005906