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CertainTeed 

August 24, 1988

Mr. Chris Roberie
Program Manager
Air Quality Division
Louisiana Department of Environmental Quality
P. O. Box 44096
Baton Rouge, LA 70804-4096

Dear Mr. Roberie:

SUBJECT: SEMI-ANNUAL LESHAP PERFORMANCE MEETING - AUGUST 2, 1988

On November 30, 1987, in a letter to Gustave VonBodungen, CertainTeed committed to two capital improvement projects designed to reduce the number of hours out of compliance with the 10 PPM Vinyl Chloride emission limit from CertainTeed's incinerators. For the first project, approximately \$40,000 was spent to increase the surge capacity of the incinerator feed system. The objective was to reduce variations in flow, pressure, and concentration to the incinerators. This project was completed during a plant turnaround in February, 1988. A second project costing approximately \$100,000 involved the replacement of the combustion chamber on the oldest incinerator. This was done to incorporate the manufacturer's newest burner and fume inlet design features and was completed during a plant turnaround in February, 1988.

In a continuing effort at improvement, CertainTeed has budgeted approximately \$100,000 for replacement of the combustion chamber of the 1979 incinerator. This will insure that both incinerators have the latest combustion technology, and should mean that emissions of Vinyl Chloride are well below the 10 PPM emission limit. This project is scheduled for completion in January, 1989.

A review of the LESHAP violation incidents discussed in the August 2 meeting reveals three significant areas:

1) Timing of the Incidents

All sixteen (16) incidents occurred before completion of the above mentioned projects in February, 1988. No incidents occurred in the second quarter report covering March, April, and May.

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2) Quantity of Vinyl Chloride Released

Seven of the sixteen incidents involved releases of less than 1.00 pounds each. The remaining releases were between 1.03 and 4.95 pounds each. This data is presented in Table I. None of these incidents involved the release of any significant quantity of Vinyl Chloride.

3) Failure of the Continuous Emission Monitor

CertainTeed's Instrument/Electrical Technicians are capable of performing routine maintenance and troubleshooting on the Arcas gas chromatograph used as the Continuous Emission Monitor. The failure reported on the CEM was extremely unusual in that several printed circuit boards failed simultaneously. This was beyond the diagnostic capabilities of CertainTeed personnel so a factory-trained serviceman was flown to Lake Charles to perform the diagnostic and repair work. The unusual nature of this failure could not be anticipated, and therefore; would not be covered during the preventative maintenance that is performed yearly on the CEM.

CertainTeed has responded positively to environmental challenges and in recognition of its environmental performance, has received Environmental Achievement Awards from the Vinyl Institute for 1986 and 1987.

In considering proposed penalties relating to LESHAP violations discussed in our August 2, 1988, meeting, CertainTeed would appreciate Department of Environmental Quality personnel considering the above mentioned facts in our favor to assess the minimum applicable penalties.

Sincerely,



Bruce J. Brocka
Technical Supervisor

cma

Attachment

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TABLE 1
CERTAINTED CORPORATION
SUMMARY OF LESHAP INCIDENTS

DATE	AVERAGE PPM	VINYL CHLORIDE IN EXCESS OF ALLOWABLE EMISSION LIMITS
09/30/87	16	0.31 POUNDS
10/22/87	12	0.10
11/06/87	30	1.03
	17	0.36
	29	0.98
	28	0.93
	24	0.72
	12	0.10
12/16/87	38	1.45
01/06/88	61	2.63
01/22/88	33	1.19
02/13/88	87	3.97
	37	1.39
	106	4.95
02/14/88	102	4.75
02/15/88	41	1.60
TOTAL HOURS 16		26.48 POUNDS TOTAL

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