

To: Lisa Lavie and John Drazkowski

January 16, 1997

From: Gary Miller

Ref: VCM emissions from PVC production dryer exhaust in Louisiana.

A review of Title V permit applications in Louisiana showed that there are four facilities besides Shintech that produce PVC in Louisiana. The VCM concentration in the dryer exhausts from these four facilities were 35 ppm, 47.5 ppm, 50 ppm and 225 ppm. This is in comparison to Shintech, which is 150 ppm in the draft permit and the application. The four facilities are:

<u>Facility</u>	<u>VCM conc. (ppm)</u>
Formosa Plastics Corporation in East Baton Rouge Parish	35
Georgia Gulf Corporation in Iberville Parish	47.5
Borden Chemical and Plastics in Ascension Parish	225
Borden Chemical and Plastics in West Baton Rouge Parish	50

Four of the facilities, including Shintech, used 40 CFR 61 Subpart F as MACT. This is the vinyl chloride NESHAP, which dates back to the 1970's. Formosa stated in their application that "The FPC (Formosa Plastics Corp.) treats all equipment in VCM and EDC service as in SOCOMI HON Group 1 service", and uses this as MACT.

Based on John's comments a further review was done to compare VCM dryer emissions to PVC production rates. The accuracy of the PVC production rates for Formosa and Georgia Gulf were difficult to ascertain. Formosa gave the amount of PVC handled at the facility as 475,785 net tons. The body of the application stated that the dryer emissions rate was based on 240 tons of PVC produced per day, or 87,600 tons per year. The 240 tons per day figure was used in the calculations. Georgia Gulf gave their PVC production rate as 1,430,000,000 pounds per year, which would be larger than Shintech's. The calculations in the Georgia Gulf application were of poor quality, and it was not possible to see what production rate was used to get the associated VCM dryer emissions. The 1,430 MM pounds per year figure was used in the calculations. A comparison of VCM dryer emissions/PVC produced is given for each facility:

	PVC Production (Tons)	Dryer Emissions (Tons VCM/year)	VCM Emissions per Ton of PVC Production
Shintech	650,000	45.4	6.98E-05
Formosa	87,600	15.3	1.75E-04
Georgia Gulf	715,000	5.856	8.19E-06
Borden-West Baton Rouge	400,000	40	1.00E-04
Borden-Ascension	300,000	42.76	1.43E-04