



Conoco Chemicals Company
Conoco Inc.
P. O. Box 91, New Highway 25
Aberdeen, Mississippi 39730
(601) 369-8111

June 24, 1983

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Mr. Jerry B. Banks, P.E.
Mississippi Department of Natural Resources
Bureau of Pollution Control
P. O. Box 10385
Jackson, MS 39209

Dear Mr. Banks:

In September 1982 EPA revised Method 107, which is used to determine the vinyl chloride content of polyvinyl chloride resin (PVC) following the steam stripping step of the PVC process. The revised method specifies that certain chromatographic columns and operating parameters must be used, however, it is also stated that alternate columns and operating parameters may be used, subject to the approval of the Administrator. It is our understanding that approval of the alternate columns and operating parameters is automatic upon notification of the Mississippi Department of Natural Resources. The purpose of this letter is to inform you that Conoco has selected alternate chromatographic columns and operating parameters, as indicated below.

<u>Method 107</u>		<u>Conoco Aberdeen Plant</u>	
<u>Parameter</u>	<u>Recommendation</u>	<u>Apparatus/Procedure</u>	<u>Reference</u>
Columns	Stainless steel 1m X 3.2mm and 2m x 3.2mm 50/80 mesh Porapak Q	Stainless steel 1/2m X 3.2mm and 1m X 3.2mm 100/120 Porapak Q	6.3.2
Oven Temperature	140°C	100°C	8.3.1.2(a)

Conoco has developed confirming data showing that resolution interferences are not encountered under the alternate operating conditions. The data is available for review upon request.

If you have any questions or comments, please contact either Dave Mahler or Dave Cox at (601) 369-8111.


John Friend
Plant Manager

c: RAF DLM, DSC, JCL

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