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Leak test folder*

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30308

April 5, 1977

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Douglas E. Michels
Conoco Chemicals
P. O. Box 91
Aberdeen, MS 39730

Dear Mr. Michels:

We have reviewed the "Leak Detection and Elimination Program" submitted by Conoco Chemicals' Aberdeen, Mississippi plant and have found portions of the program to be inadequate. The deficiencies are identified as follows:

Section B - Vinyl Chloride Monitoring System

1. No description was presented for the analytical technique, i.e., the type of chromatographic columns used, flow rates, temperatures, cycle time, type of carrier gas, etc., pursuant to 40 CFR Part 61.65(c).
2. No description was presented for the sample injection procedure pursuant to 40 CFR Part 61.65(c).
3. No description was presented for the sample handling equipment or procedure pursuant to 40 CFR Part 61.65(b)(8)(i).

Section C - Portable Hydrocarbon Detectors

1. The HUN Photo-ionizer portable hydrocarbon detector is not a flame ionization or ultra-violet absorption type detector and the accuracy can not be determined pursuant to 40 CFR Part 61.65(b)(8)(i).
2. The description of the sample handling procedure and equipment is inadequate pursuant to 40 CFR Part 61.65(b)(8)(ii).

Section D - Calibration and Maintenance Procedures

1. Continuous Monitor Calibration

- a. The calibration schedule is inadequate, i.e., the analyzer would not be spanned daily as specified in 40 CFR Part 61.65(b)(8)(iii).

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- b. The calibration procedure is inadequate, i.e., the procedure is not detailed enough so as to attest to the reliability and accuracy of the data generated pursuant to 40 CFR Part 61.65 (b)(8)(i).

2. Continuous Monitor Maintenance

- a. The maintenance procedure is inadequate, i.e., there is no detailed procedure for corrective or preventative maintenance operations pursuant to 40 CFR Part 61.65(b)(8)(i).
- b. The preventive maintenance schedule is inadequate, i.e., the frequency of the checks is not sufficient to insure the reliability and accuracy of the data pursuant to 40 CFR Part 61.65(b)(8)(i) and (iii).
- c. The electronic zero should be verified periodically so as to insure the validity and the accuracy of the generated data pursuant to 40 CFR Part 61.65(b)(8)(i).

3. Portable Monitor Calibration and Maintenance

- a. The calibration procedure is inadequate, i.e., the procedure is not detailed enough so as to attest to the reliability and accuracy of generated data pursuant to 40 CFR Part 61.65(b)(8)(ii).
- b. The calibration schedule is inadequate, i.e., there was no specified frequency pursuant to 40 CFR Part 61.65(b)(8)(iii).
- c. The maintenance procedure and schedule is inadequate, i.e., it is not specified, explained or detailed enough so as to be able to insure reliable and accurate data pursuant to 40 CFR Part 61.65(b)(8)(ii) and (iii).
- d. No standard operating procedure was specified for the operation, calibration, and maintenance of the portable analyzers pursuant to 40 CFR Part 61.65(b)(8)(i), (ii), (iii) and 40 CFR Part 61.65(c).
- e. The data recording or data handling systems were not specified. Without knowledge of these systems no judgement can be made of the possible reliability or accuracy of the monitoring system pursuant to 40 CFR Part 61.65(b)(8)(i) and (ii).

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Section E - Location of Continuous Monitoring Points

The location of the monitoring points is not discernable when comparing Table 1 with the plant schematic diagram because the monitoring points do not have the same designation on both.

Please be advised that pursuant to 40 CFR Part 61.65(b)(8), the owner or operator of a vinyl chloride source shall submit a formal leak detection and elimination program to the EPA Administrator for approval. Accordingly, you are hereby requested to re-submit an acceptable program within 30 days after the date of this letter.

Any questions concerning this notice may be directed to Dr. J. S. Wu by telephone at 404/881-4552 or by letter to this office.

Sincerely yours,


Brian L. Beals
Air Engineering Branch

cc: MS Division of Air Pollution Control