

Conoco Chemicals
Continental Oil Company
P O Box 91, New Highway 25
Aberdeen, Mississippi 39730

April 6, 1979

Mr. Tommie A. Gibbs
Chief, Air Engineering Branch
United States Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, GA 30308

Dear Mr. Gibbs:

A "Leak Detection and Elimination Program" for the Conoco Chemicals Company PVC Plant at Aberdeen, Mississippi, was submitted on May 9, 1977, and was approved by your office on June 30, 1977. We have revised that program to accomplish the following:

1. Lower the continuous monitoring system action level defining a leak to 5 ppm vinyl chloride in all cases.
2. Establish a specific and standardized procedure for routine leak patrols.
3. Convert from the use of Century OVA portable hydrocarbon detectors to HNU portable hydrocarbon detectors.
4. Update the continuous monitoring system sample locations.

Plant and industry experience with the HNU portable hydrocarbon detector shows it to be reliable in vinyl chloride service and it is simpler, more rugged, and requires less maintenance than the Century OVA.

Approval of this revised "Leak Detection and Elimination Program" is requested prior to its issue in the plant.

Sincerely,

R. A. Frohreich

R. A. Frohreich
Chief Process Engineer

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Attachment

B/C: CLM, ELK(4), SJV, AHS, MCJ, JRM, VEM, JPW, PAK