



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

Enclosure (1)

August 15, 1983

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:

As you are aware, EPA has approved the Leak Detection and Elimination Plan for Conoco's Aberdeen, MS PVC Plant. The approval letter states that "any changes in the monitoring specifications and operating procedures as submitted should receive prior written approval from EPA". In the near future Conoco intends to relocate several of the fixed point monitoring system sample locations, therefore written approval of these changes is requested from the Mississippi Department of Natural Resources. A listing of the proposed sample locations is attached.

As part of these changes, the existing incinerator exhaust sample stream (presently stream No. 5, old reactor module GC) will be eliminated. A new gas chromatograph (GC) is being installed to monitor the incinerator exhaust, exclusively. The new incinerator exhaust GC is similar in construction and operation to the other four GCs, therefore Conoco intends to maintain and calibrate the new GC in accordance with current Plant practices. Our experience has indicated that a weekly span check is more than sufficient to maintain a reliable degree of GC calibration accuracy. EPA has concurred with this view, and a weekly span check of the existing GCs was approved by EPA in the Leak Detection and Elimination Plan. Since the new incinerator exhaust GC will be regulated under 40 CFR 61.68 (Emission monitoring), and not under 40 CFR 61.65 (b)(8) (Leak Detection and Elimination), it is requested that the Mississippi Department of Natural Resources approve a weekly span check of the new incinerator exhaust GC. Please note that the existing incinerator exhaust GC (old reactor module GC) is currently being span checked weekly, therefore approval of this request will not result in less stringent emission monitoring than what is currently done.

If you have any questions concerning this request, please do not hesitate to call me at (601) 369-8111, extension 2285.

Sincerely,

Dave Mahler

Dave Mahler
Environmental Engineer

DTH 000087738

bc: JF, RAF, JCL

FIXED POINT MONITORING SYSTEM
SAMPLING POINTS (LISTED)
ALBERTA PETROCHEMICAL PLANT

GC No. 1 - Tank Farm

1. VCM Railcar Unloading Compressor Shed
2. North VCM Railcar Unloading Station
3. North Middle VCM Railcar Unloading Station
4. South Middle VCM Railcar Unloading Station
5. South VCM Railcar Unloading Station
6. VCM Storage Sphere
7. Emission Recovery System, Upstairs
8. Emission Recovery System, Downstairs
9. No. 6 Dryer Blend Tanks
10. Process Control Room

GC No. 2 - Old Reactor Module

1. Fresh VCM Receiver
2. North RVCM Receiver
3. Large Recovery System, Downstairs
4. Large Recovery System, Upstairs
5. Reactor Dump Swaco
6. Bottom of D-300 Reactor
7. Top of D-400 Reactor
8. Bottom of D-500 Reactor
9. Top of D-600 Reactor
10. Bottom of D-700 Reactor

GC No. 3 - New Reactor Module

1. Bottom of 741 Reactor
2. Top of 742 Reactor
3. Bottom of 743 Reactor
4. Top of 744 Reactor
5. Bottom of 745 Reactor
6. Reactor Dump Swaco
7. Recovery System, Downstairs
8. Middle VCM Receiver
9. Blowdown Tank
10. Recovery System, Upstairs

GC No. 4 - Lab

1. Front Guard House
2. Maintenance Shop
3. No. 1 Dryer Blend Tanks
4. Quality Control Lab.
5. GC Lab.
6. South of Plasticizer Building
7. Compound Line I
8. Dry Blend Building
9. Front Offices
10. Plant Breathing Air

DTH 000087739