



Date 9 March 1982

INTEROFFICE
MEMORANDUM

Subject VCM Monitoring Emulsions CE (\$166,000)
Leak Detection and Elimination Program

To Distribution

(Location, Organization, or Department)

From A. J. Diglio

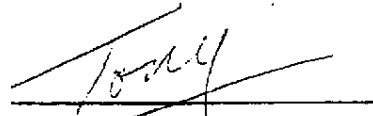
Chemicals Manufacturing

(Location, Organization, or Department)

J. J. Baliker / with CE
R. C. Lietzau
F. C. Rydzewski

As requested, the subject CE was reviewed by Jim Dixon, Jay Spata and Tony Diglio. Indications are that there are adequate provisions and procedures, if executed properly, to comply with the VCM environmental regulations. However the use of this hardware to conduct a program is presently difficult and labor intensive. If we cannot assure ourselves that these procedures are properly executed, then it is suggested that the operator be aided by a microprocessor that would print an alarm each time the leak level is exceeded including the sample, plant, location, time and level. It is suggested the cost of the microprocessor be evaluated versus its benefit.

Other modifications included in the CE request such as area alarm lights, at various VCM levels are requirements of safety and hygiene and should be reviewed by this group.


A. J. Diglio

AJD/nlb

cc: M. R. Chmura
J. G. Dixon
W. D. Greer
B. D. Helms
J. K. Spata

(320)

AP00036505



Date 17 February 1982

INTEROFFICE
MEMORANDUM

Subject CE Request - VCM Monitoring System

Calvert City Emulsions

To A. J. Diglio

Chemicals Manufacturing

(Location, Organization, or Department)

From J. G. Dixon

Chemicals Manufacturing

(Location, Organization, or Department)

Per your request, I have reviewed the subject CE request in relation to requirements of the NESHAPS vinyl chloride standard.

My review indicates that the monitoring hardware presently in existence in the Calvert City emulsions plant is sufficient to meet the minimum requirements of 40 CFR61 subpart F. These standards include the use of reliable and accurate gas chromatography; continuous, sequential sampling and analysis; multiple sampling points; and records of leaks detected including concentration, location, date and approximate time.

However, use of this hardware to conduct an effective leak detection and elimination program in the Calvert Emulsions plant is presently difficult and labor intensive. Currently, GC charts are the only record of the leak monitoring system. These charts must be monitored continuously by operating personnel to identify leaks. Since the GC is monitoring several different points for three different vapors; identification of sampling points, contaminant, and concentration is not straightforward. Identifying repeating concentration for "leak" detection is likewise difficult. The GC chart is being stored for two years to meet the NESHAPS recordkeeping requirements. Charts must be manually dated and time-benchmarked. Review of system operation for any specific date necessitates scanning a chart record which may be tens of feet in length.

A portion of the proposed project would modify the GC's to monitor only VCM and would install a microprocessor to manage the analyzer output. The microprocessor would print an alarm each time the "leak" level is exceeded including sample point, location, time and level. The operator can then simply monitor the computer output to identify "leaks" and take appropriate action. The computer output would replace the GC strip Charts for recordkeeping purposes and simplify retrieval.

The computerized data management system would facilitate identification of "leaks" and timely response to leak incidents. The system would also automatically provide the required leak detection documentation in a straight forward and easy-to-use format. It is therefore recommended that this portion of the CE request be broken-out for independent economic evaluation from a NESHAPS standpoint. It is also recommended that provisions be included for automatic daily spanning of the GC systems with a standard gas as required by the regulations.

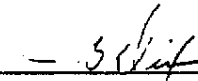
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CE Request

Other modifications included in the CE request such as the area alarm lights are motivated by employee exposure and safety concerns and should be reviewed by those with responsibilities in these areas.

Form 5047 submitted with the CE request should be modified to reflect the outlined division of cost. The total capital cost of the project is not environmentally related or required by regulation as is indicated on the submitted form.



J. G. Dixon

JGD/nlb

AP00036507