



Interoffice Communication

To : J. P. Warner
From : R. A. Frohreich
Date : July 10, 1981
Subject : PREVENTION OF RELIEF VALVE DISCHARGES

EPA has asked you to describe equipment, procedures and methods used at Conoco's other plants to prevent VCM discharges. Listed below are additional items done in Aberdeen which are not mentioned in John Friend's letter to the EPA dated December 12, 1979. It should be noted not all the Oklahoma City procedures are used at Aberdeen.

1. Each reactor has a nitric oxide kill system which is used to terminate the polymerization reactor in emergency situations.
2. The standard operating procedure states if the pressure of a reactor producing 5385 resin reaches 145 psig the reaction will be terminated with the emergency nitric oxide system.
3. The standard operating procedure states that after every coarse batch the condenser will be inspected to determine if it plugged. If the condenser is found to be plugged, it will be cleaned prior to charging the next batch in that reactor.
4. The standard operating procedure states there will be a reduction in initiator loading for the next batch following a coarse batch.
5. To insure a reactor is empty before charge the standard operating procedure states:
 - A. After reactor rinse is complete the panel operator will check the reactor agitator ammeter to assure that it indicates no load on the agitator.
 - B. The outside operator will check the drain bullseye and indicate to the panel operator there is no flow from the reactor.
 - C. The panel operator will then put rinse water into the reactor and the outside operator will observe the dump bullseye to determine flow from the reactor is normal and thus will completely drain.

- D. The outside operator will continue to observe the bullseye and inform the panel operator when flow stops.
- E. The reactor will then be evacuated and charged if the previous steps proceed normally.
- F. If high amperage on the agitator or improper draining is detected, the shift supervisor will be notified and he will further check to assure the reactor is empty before charging.



R. A. Frohreich

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c: CLM, CRM, JJH, JF