



Leidy - Aber

Interoffice Communication

To John Friend
From J. C. Ledvina
Date March 17, 1982
Subject LEAKING RELIEF VALVE - ABERDEEN PVC PLANT

RECEIVED
MAR 17 1982
BRADLEY I. RAFFLE

? Veldon Messick informed me that a relief valve on the New Module Blowdown Tank was found to be leaking VCM. The leak was found at 10:30 p.m. on 3/15/82 after a high reading was observed on the fixed point monitor system. Earlier in the day, plant personnel made their routine weekly inspection of all rupture disk/relief valve systems in VCM service. The New Module Blowdown Tank rupture disk under the relief valve was found to be blown and was scheduled to be replaced later in the week.

After finding that the relief valve was leaking, the Blowdown Tank was taken out of service and the rupture disk and relief valve replaced. Subsequent water testing in the shop indicated the relief valve was acting unusually and leaking even at low pressure.

I understand the leak was reported to the National Response Center as a Superfund reportable incident. The NRC was told less than 10 lbs. of vinyl chloride was emitted to the atmosphere.

This incident is similar to one which occurred on July 19, 1980 at Aberdeen where the vinyl chloride sphere relief valve was found to be leaking. Both incidents can be considered leaks rather than relief valve discharges under the Vinyl Chloride NESHAP's standard. Section 61.65(b)(4) specifically recognizes that relief valves can leak and requires that this leakage be minimized.

I've discussed this interpretation with Brad Raffle of Legal. He agrees that these are leak situations and not reportable as relief valve discharges under NESHAP's.

J. C. Ledvina
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ajo

cc B. I. Raffle
R. A. Conrad
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