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

November 30, 1976

United States Environmental Protection Agency
Suite 300
1421 Peachtree Street
Atlanta, GA 30309

ATTENTION: Director, Enforcement Division

Dear Sir:

Please find attached the Leak Detection Program description section of our Plant's Compliance plan for control of Vinyl Chloride Emissions. This program is being submitted in accordance with the requirements of the National Emission Standards for Hazardous Air Pollutants, Standard for Vinyl Chloride, as appeared in the Federal Register of October 21, 1976 (40CFR, Chapter 1, Subchapter C, Part 61, pages 46560 - 46573).

The program, as described, fully meets the intent of the Leak Detection and Elimination requirement of the Standard (61.65 b, 8). We do wish, however, to alert the EPA to several small items which are at variance to the information in the Federal Register.

1. The plant will calibrate the continuous monitors once per week. The plant has substantial evidence that weekly calibration will maintain the required accuracy of the continuous monitoring systems.
2. The span check for all monitoring points will use a calibration gas cylinder containing 5 ppm vinyl chloride, traceable to the National Bureau of Standards. A leak will be defined, in most cases, by this concentration. However, some areas will use a concentration of 10 ppm to define a leak.
3. The calibration readings of the portable monitoring instruments are electronically zeroed before each use. Recalibration with a gas sample is unnecessary after this instrument has been initially programmed. Checks using sample gas cylinders will be performed only as malfunctions occur.

We have discussed these procedures with the equipment vendors and have developed our methods as a result of these vendor contacts. We believe our methods to be sufficient to maintain the accuracy and reliability of the devices we use. The proposed program will meet the needs of the Leak Detection and Elimination Program as described in the Federal Register. We ask the Administrator to review and approve this program. It will be fully implemented within 15 days of approval.

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Should the Administrator find that the program is unacceptable, we ask the Administrator to grant us a waiver under paragraph 61.11 until appropriate revisions can be instituted and the revised program developed.



Douglas Michels
Chief Process Engineer
Conoco Chemicals
Aberdeen PVC Plant

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