

Interoffice Communication

To DISTRIBUTION

From Veldon E. Messick

Date July 16, 1979

Subject COMPLIANCE WITH REVISED LEAK DETECTION AND ELIMINATION PROGRAM

The EPA has approved the revised Leak Detection and Elimination Program submitted April 6, 1979. Listed below are the major items that must be done to be in compliance with the Leak Detection Program.

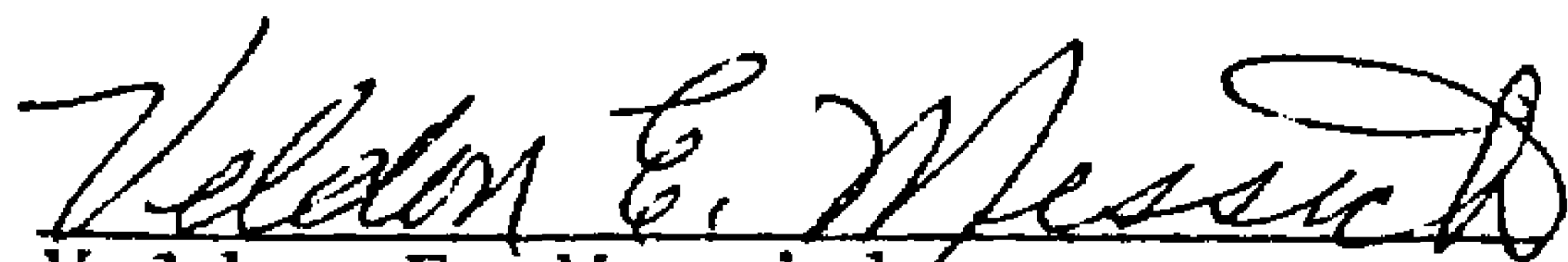
1. Hourly readings of VCM concentration at the plant's 40 monitoring points must continue to be recorded on the VCM Continuous Monitoring Log Sheets. The forms are still to be turned into the safety/lab secretary for monthly data reduction.
2. The plant's definition of a leak has been changed. A leak is now defined as three (3) consecutive readings in excess of 5.0 ppm as recorded by the VCM continuous monitoring (CM) system. If a leak is recorded by the CM system, the HNU portable hydrocarbon detector is used to pinpoint the leak. The HNU is also used to verify that the leak has been repaired. A Leak Detection Reporting Form (Revised) is to be filled out and turned into the process engineering co-op engineer for each leak recorded.
3. A routine leak patrol is to be conducted weekly of the locations listed on the Leak Patrol Survey (Revised) by the safety department. If a leak is found during the survey, the appropriate part of the Leak Detection Reporting Form for Portable Detector (New) is to be filled out by the person conducting the survey. He then immediately turns this form into the vinyl shift supervisor for corrective action. Verification that the leak has been repaired is made by taking another reading with the portable detector. The form is then turned into the process engineering co-op engineer for filing.
4. Each Honeywell chromatograph unit is checked daily (5 days per week) using the Daily Checklist (Revised) starting July 18, 1979. The Daily Check forms are turned into the process engineering co-op engineer for filing.
5. Each Honeywell chromatograph is to be calibrated on a weekly basis. A 5.0 ppm gas standard traceable to the National Bureau of Standards is to be used. The Honeywell Continuous Monitoring Calibration Report form is to be filled out and turned into the process engineering co-op engineer for filing. (The 10 ppm standards we currently have should be used until the new 5.0 ppm standards are ordered and received.)

6. The HNU portable hydrocarbon detectors are to be calibrated on a weekly rotation basis. Each week, the monitor in the control room is to be taken to the guardhouse and exchanged for a calibrated monitor. The person conducting the leak patrol should pick up a monitor at the guardhouse and return it there after use. Anyone else using a monitor should pick it up at the guardhouse and return it to the guardhouse after use. The guard will tag the monitors that have been used and indicate they need to be calibrated. These monitors are to be calibrated by the instrument shop and returned to the guardhouse as soon as possible.

The monitors are to be calibrated with a 5.0 ppm VCM in air standard traceable to the National Bureau of Standards. The calibration apparatus and procedure is given in the Leak Detection and Elimination Manual. The HNU Portable Hydrocarbon Detector Calibration Report form (New) is to be filled out and turned into the process engineering co-op engineer for filing.

7. The reports filled out for the Leak Detection and Elimination Program are important. These reports are the evidence that our plant is in compliance with this part of the VCM standards. Cooperation by everyone involved is required to maintain accurate records.

Details to the above items are given in the Leak Detection and Elimination Program Manual. If you need extra copies or have any questions, please let us know. Copies of the forms that are to be filled out are attached.


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Attachments

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