



Interoffice Communication

To J. C. Ledvina - Houston
From J. A. DeBernardi
Date June 25, 1981
Subject Proposed Fugitive Emission Standard

Another thought has come to my mind related to your letter of June 5 on the subject and comments on safety of block valves under relief valves. A far greater safety problem than block valves is presented by the fact that rupture disks are installed in the system. A small leak in a rupture disk that equalizes process pressure on both sides of the disk means that the relief pressure of the disk is increased by the addition of the process pressure. Therefore, the disk will not relief until a much higher pressure than disk design is reached. Tracking this situation with procedures is much harder than tracking whether a block valve is open or not under the relief valve.

The basic problem remains that rupture disk installation will increase, not decrease, emissions to atmosphere.

A handwritten signature in dark ink, appearing to read "J. A. DeBernardi", with a stylized, cursive-like script.

J. A. DeBernardi
Plant Manager
Conoco VCM

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CC:
RDG

CCR 000067108