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LEAK DETECTION AND ELIMINATION PROGRAM

ABERDEEN CHEMICAL PLANT

H. ROUTINE LEAK PATROL-DATA RECORDING AND HANDLING

There are five different leak patrols conducted at various intervals during the year. If a leak is detected(as identified in Section K), the Action Plan for Leak Elimination(Section J) must be initiated and the leak recorded on the Leak Detection Reporting Form. The five leak patrols are as follows:

1. Daily Leak Patrol- Check each pump and compressor on the attached "PUMP AND COMPRESSOR SURVEY" form for sensor or visual evidence of a leak. File the form in the Operations Supervisor's office.

2. Weekly Leak Patrol- Check each Weekly Leak Patrol Survey location on the attached list and complete the attached ~~"LEAK PATROL SURVEY~~" form once per week. The HNU portable hydrocarbon detector will be used for this patrol. The inspector is to record the concentration at each point monitored. If there is a reading where the HNU reads full scale(2000 p.p.m.), the TLV must be used to determine if it is a leak as defined in Section K. The pumps in VCM service must also be checked visually once per week. This form will be filed in the Safety Department.

3. Monthly Leak Patrol- (1) Check each item on the attached "Pump Survey Form" once per month with the TLV portable hydrocarbon detector. File the form in the Safety Department. (2) Check each item on the attached "Monthly Patrol Survey" Form. The HNU portable hydrocarbon detector will be used for this patrol. The inspector is to record the concentration at each point monitored. If there is a reading where the HNU reads full scale (2000ppm), the TLV must be used to determine if it is a leak as defined in section K. This form will be filed in the safety department.

4. Yearly Random Valve Survey- At the direction of the Director of Environmental Control, 200 valves in VOC service chosen at random will be tested in accordance with Section 61.65(b)(8)ii of the NESHAP regulations. File the documentation in the Engineering Files.

5. Yearly Closed Vent Piping Survey- At the direction of the Director of Environmental Control, the closed vent piping and valves from the Old Module VCM receivers to the incinerator firing chamber will be tested in accordance with Section 61.242-11 of Subpart V of the NESHAP regulations.

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LEAK DETECTION AND ELIMINATION PROGRAM

ABERDEEN CHEMICAL PLANT

H. ROUTINE LEAK PATROL-DATA RECORDING AND HANDLING

There are six different leak patrols conducted at various intervals during the year. If a leak is detected(as identified in Section K), the Action Plan for Leak Elimination(Section J) must be initiated and the leak recorded on the Leak Detection Reporting Form. The six leak patrols are as follows:

1. Daily Leak Patrol- Check each pump and compressor on the attached "PUMP AND COMPRESSOR SURVEY" form for sensor or visual evidence of a leak. File the form in the Operations Supervisor's office.

2. Weekly Leak Patrol- Check each location on the attached list and complete the attached "WEEKLY LEAK PATROL SURVEY" form once per week. The HNU portable hydrocarbon detector will be used for this patrol. The inspector is to record the concentration at each point monitored. If there is a reading where the HNU reads full scale(2000 p.p.m.), the TLV must be used to determine if it is a leak as defined in Section K. The pumps in VCM service must also be checked visually once per week. This form will be filed in the Safety Department.

3. Monthly Leak Patrol

   A. Check each item on the attached "PUMP SURVEY FORM" once per month with the TLV portable hydrocarbon detector. File the form in the Safety Department.

   B. Check each item on the attached "Monthly Patrol Survey" form. The HNU portable hydrocarbon detector will be used for this patrol. The inspector is to record the concentration at each point monitored. If there is a reading where the HNU reads full scale (2000 PPM), the TLV must be used to determine if it is a leak as defined in section K. This form will be filed in the safety department.

4. Yearly Random Valve Survey- At the direction of the Director of Environmental Control, 200 valves in VOC service chosen at random will be tested in accordance with Section 61.65(b)(8)ii of the NESHAP regulations. File the documentation in the Engineering Files.

5. Yearly Closed Vent Piping Survey- At the direction of the Director of Environmental Control, the closed vent piping and valves from the Old Module VCM receivers to the incinerator firing chamber will be tested in accordance with Section 61.242-11 of Subpart V of the NESHAP regulations.

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LEAK DETECTION AND ELIMINATION PROGRAM

ABERDEEN CHEMICAL PLANT

H. ROUTINE LEAK PATROL - DATA RECORDING AND HANDLING

There are five different leak patrols conducted at various intervals during the year. If a leak is detected (as identified in Section K), the Action Plan for Leak Elimination (Section J) must be initiated and the leak recorded on the Leak Detection Reporting Form. The five leak patrols are as follows:

1. Daily Leak Patrol - Check each pump and compressor on the attached "PUMP AND COMPRESSOR SURVEY" form for sensor or visual evidence of a leak. File the form in the Operations Supervisor's office.

2. Weekly Leak Patrol - Check each location of the attached list and complete the attached "LEAK PATROL SURVEY" form once per week. The HNU portable hydrocarbon detector will be used for this patrol. If there is a reading where the HNU reads full scale (2000 ppm), the TLV must be used to determine if it is a leak as defined in Section K. The pumps in VCM service must also be checked visually once per week. This form will be filed in the Safety Department.

3. Monthly Leak Patrol - Check each item on the attached "PUMP SURVEY FORM" once per month with the TLV portable hydrocarbon detector. File the form in the Safety Department.

4. Yearly Random Valve Survey - At the direction of the Director of Environmental Control, 200 valves in VOC service chosen at random will be tested in accordance with Section 61.65 (b)(8)ii of the NESHAP regulations. File the documentation in the Engineering Files.

5. Yearly Closed Vent System Survey - At the direction of the Director of Environmental Control, the closed vent system from the Old Module VCM receivers the the incinerator firing chamber will be tested in accordance with Section 61.242-11 of Subpart V of the NESHAP regulations. File the documentation in the Engineering Files.