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# Interoffice Communication

To J. C. Ledvina - Houston

From J. A. DeBernardi

Date June 15, 1981

Subject Proposed Fugitive Emission Standard

The following are my comments related to your letter of June 5 on the subject.

If a time requirement on rupture disk replacement after failure is part of this standard more than five days should be requested to overcome unforeseen circumstances such as rupture disk availability or need for special equipment (perhaps a crane) to affect the changeout.

The overall problem that is being missed by this regulation is the fact that it is being assumed that the rupture disk failure is caused by overpressure that breaks the disk and lifts the relief valve. In fact, rupture disks fail prematurely more often than from overpressure. Pressure cycles, corrosive materials, etc. account for these failures by far more often than equipment overpressure.

We have been, and I assume will continue to be, successful in using block valves under relief valves in our plant. Proper procedures can, and are, set-up to assure that block valves are open and remain that way in our plant and many others. In a potentially corrosive process environment, use of rupture disks without block valves in relief valve service will adversely affect stream factor thereby reducing productivity and increasing operating costs for the process. It is my opinion that this standard will increase fugitive emissions to the atmosphere from process start-ups and shutdowns which it has the potential to cause. The overall impact on the environment will be exactly opposite of the intent.

It is our plant's intent to continue the use of block valves in relief service. This is not a safety issue when proper procedures are established and followed. With this assumption, and barring any unforeseen circumstances, rupture disk replacement should be possible within a five day period.

J. A. DeBernardi

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