



Conoco Chemicals Company
Conoco Inc.
P. O. Box 91, New Highway 25
Aberdeen, Mississippi 38730
(601) 369-8111

August 15, 1983

Mr. Jerry B. Banks, P. E.
Mississippi Department of
Natural Resources
Bureau of Pollution Control
P. O. Box 10385
Jackson, MS 39209

Dear Mr. Banks:

As you are aware, EPA has approved the Leak Detection and Elimination Plan for Conoco's Aberdeen, MS PVC Plant. The approval letter states that "any changes in the monitoring specifications and operating procedures as submitted should receive prior written approval from EPA". In the near future Conoco intends to relocate several of the fixed point monitoring system sample locations, therefore written approval of these changes is requested from the Mississippi Department of Natural Resources. A listing of the proposed sample locations is attached.

As part of these changes, the existing incinerator exhaust sample stream (presently stream No. 5, old reactor module GC) will be eliminated. A new gas chromatograph (GC) is being installed to monitor the incinerator exhaust, exclusively. The new incinerator exhaust GC is similar in construction and operation to the other four GCs, therefore Conoco intends to maintain and calibrate the new GC in accordance with current Plant practices. Our experience has indicated that a weekly span check is more than sufficient to maintain a reliable degree of GC calibration accuracy. EPA has concurred with this view, and a weekly span check of the existing GCs was approved by EPA in the Leak Detection and Elimination Plan. Since the new incinerator exhaust GC will be regulated under 40 CFR 61.68 (Emission monitoring), and not under 40 CFR 61.65 (b)(8) (Leak Detection and Elimination), it is requested that the Mississippi Department of Natural Resources approve a weekly span check of the new incinerator exhaust GC. Please note that the existing incinerator exhaust GC (old reactor module GC) is currently being span checked weekly, therefore approval of this request will not result in less stringent emission monitoring than what is currently done.

If you have any questions concerning this request, please do not hesitate to call me at (601) 369-8111, extension 2285.

Sincerely,

Dave Mahler
Environmental Engineer

bc: JF, RAF, JCL

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