

VCM Plant

Conoco Chemicals
Continental Oil Company
P.O. Box 605
Westlake, Louisiana 70669
(318) 882-0550

January 27, 1976

U. S. Department of Labor
Occupational Safety and Health Administration
2156 Woodale Boulevard
Hoover Annex, Space A&B
Baton Rouge, LA 70806

Attention: J. E. Powell, Area Director

Reference: Citation D-8366-010-76 Issued From Your Office January 16,
1976 (Amended)

We were in receipt of the reference citation January 19, 1976. We propose not to contest the citation. Enclosed please find a check for \$40.

CORRECTIVE ACTIONS

In order to adequately describe what actions have been taken to abate the reference citation, I feel some explanation and background data is necessary to alert you to what is already being done to adequately protect and train our personnel in the proper methods for handling vinyl chloride.

A. Background

1. Emergency and disaster procedures specific for VCM exist in the plant to recognize, assess, and take the immediate actions required to control and eliminate emergencies that may arise. In addition, annual training of emergency actions and the use and care of respiratory protection is also covered.
2. In accordance with the VCM Standards, Paragraph 1910.1017, training and/or information is also provided each quarter to all employees between April 1, 1975 and April 1, 1976 who choose not to wear respiratory protection for VCM concentrations that do not exceed 25 ppm. This training/information covers the hazards of vinyl chloride and the purpose, proper use, and limitations of respiratory devices.
3. Eight self-contained breathing apparatuses (SCBA) are provided in the plant control room and are maintained in a state of readiness for plant emergencies. In addition, 14 other units are located in various places throughout the plant for emergency use. The status of all these units are checked monthly to assure they are operational and available for immediate use.

B. Immediate Corrective Action

1. January 23, 1976 - All Operation Shift Supervisors who are responsible members of the plant emergency and disaster team designated to respond to VCM and other plant emergencies were instructed January 21 to conduct a special training session with their employees. The training was conducted with all employees in the department including those employees directly involved with the violation.

Special emphasis was placed on the need for all employees potentially exposed to unknown VCM concentrations during minor excursions or a massive release to wear appropriate respiratory protection when controlling the release.

2. January 22, 1976 - The VCM Health and Safety Manual was also reviewed and revised to more specifically delineate the requirement to wear self-contained breathing apparatus when controlling both massive and minor releases of vinyl chloride in the future.

It is our opinion the immediate actions we have taken plus the procedures and safe practices already being exercised shall eliminate this type violation and potential employee exposures in the future.

Sincerely,



J. A. DeBernardi
Plant Manager

is

BCC:

RDG-REL-DAK-AFG-JF-CEG

CCR 000081381

Calcasieu Marine  National Bank

LAKE CHARLES, LOUISIANA 70601

2932

Jan. 29 1976

84-18
652

FOR Occupational Safety & Health - Labor \$40.00
ty and ^{no}/100 _____ DOLLARS

PETTY FUND

Station D-8366-010-76

J. H. Brunson

⑆0652⑉0018⑆ 01 011723⑉01 CONTINENTAL OIL COMPANY

CCR 000081382

Debs Gamblin



To J. A. DeBernardi

Date 2-9-76

Can you give me a report on the locations of the
"66" high samples discussed during Gerwig's
review by 2-13-76.

A handwritten signature, possibly "DJ", in dark ink.

mbr

Answered
2/13/76

Classification	ppm VOM	Fresh Air Protection			Location
		yes	No	Not Indicated	
Chief Operator	1.52		0		Turnaround BIK II purging, sampling etc
"	3.02			X	Turnaround work
	1.41		0		Turnaround work
	3.85		0		Plant start up
	1.46			X	Not indicated

Block I

Day	1.84	✓			Washing Light Ends Column
	2.82		0		Block I Turnaround
	4.46		0		Clearing vessels in BIK I
	1.06		0		Catching samples in BIK I
	1.03		0		Turnaround work
	10.72	✓			catching samples in BIK I
	1.54	✓			catching samples in BIK I
	1.14			X	Bringing up Unit
Night	4.19		0		General turnaround duties
	1.41			X	switching HE Reboilers in BIK I

Block II	4.37			X	leak on P-203-A shut down furnace
	1.08		0		BIK II purging system
	1.08		0		clearing vessels in Block II
	2.53			X	Outside Turnaround
	2.56		0		Routine BIK II operations
	1.08		0		Routine BIK II operation

Shift Foreman

	3.38		0		Not Specified CCR 000081384
	3.71		0		General unidentified
	1.12	✓			heating rack, sampled & switched about 7K

Occupation	ppm	Fresh Air Protection			Location
		Yes	No	Not Indicated	
Painting Painter	1.72		0		Painting yellow line in BIK I Regulated Area
Laboratory	3.71		0		G.C. room
	1.08		0		Wet chem room
	1.79		0		Wet chem room
	3.97		0		Wet chem room
	1.30		0		Wet Chem room
	1.13		0		G.C. room
Leadmen & Supervisors	1.98		0		Cleaning "O" ring on quick disconnects at loading
	42.46	✓			Changing 402 Filters
Instrumentmen	1.18	✓			Vented vinyl chloride lines in BIK I
	2.14		0		Worked in loading rack, BIK II, BIK I, control room
Insulator	1.28		0		Working around T-252 pit
Ex-painter	26.52	✓			Loading caustic dryer BIK I
	918.29	✓			Washing caustic dryer BIK I
Mechanical Helpers	18.35	✓			Replacing T-411-C Vent
	66.52		0		Changing T-401 Filters
	1.16		0		Not indicated
	3.19	✓			Vinyl Caustic dryer Filter
Tool Room Repairmen	2.21		0		Shop tool Room

Classification	ppm VCM	Fresh Air Protection			Location
		yes	No	Not Indicated	
oilermaker	440	✓			Blinding S-207 A & B
	3.34		0		L.E. dryer Filter change
	2.78		0		L.E. dryer Filter change
	24.88	✓			Opening & washing S-207
	16/34	✓			opening & washing S-207 A
	1.53			X	General Plant Routine
Electrician					
	2.44		0		Shop, Lab, main office, control room, top deck of off
Welder					
	10.60			X	Block II Quench Column
	1.22	✓			Working on top of T-402
	3.91			X	Blinding R-101
	5.95		0		by loading pumps at Loading Rack
Millwright					
	1.05		0		Working on Vinyl Transfer pump
	36.83	✓			Changing Filters on F-101
	1.01		0		Blinding R-101
	2.79			X	Working on Vinyl Column
Pipefitter					
	1.51	✓			Installing decoking spools - R-201 A
	4.76			X	Working in BIK II - Quench Column
	5.86			X	BIK I and shop
	10.55		0		T-411-C Tie-in

<u>Classification</u>	<u>ppm</u> <u>NCM</u>	<u>Fresh Air Protection</u>			<u>Location</u>
		<u>yes</u>	<u>No</u>	<u>Not Indicated</u>	

Technical Staff

4.95	0				Watching L.E. dryer filter change
3.20	0				Maintenance conference room, office
2.40	0				Lab & front office
1001	0				Control room & front office
10.73	0				B/K II & in Tank Farm
4.39	0				General Plant near S-207 A+B