

Return to way - 406/202

REGISTERED MAIL



UNION CARBIDE CORPORATION
CHEMICALS AND PLASTICS

P.O. BOX 8004, SOUTH CHARLESTON, W. VA. 25303

SOUTH CHARLESTON PLANT

August 31, 1977

Mr. Abraham Ferdas
Environmental Protection Agency
Region III
Curtis Building, 2nd Floor
6th & Walnut Streets
Philadelphia, Pennsylvania 19106

Subject: Vinyl Chloride Release,
August 23, 1977

Ref.: Telephone Conversation,
W. C. Young to D. M. Myers,
August 23, 1977

Ref.: Telephone Conversation,
W. C. Young to A. Ferdas,
August 23, 1977

Dear Mr. Ferdas:

On August 23, 1977, at 4:45 a.m., a release of 600 lbs. of vinyl chloride occurred at our Solvent Vinyl Resins Unit. The release was caused by operator error.

Please recall that the amount of the release was given conservatively as not exceeding 3200 lbs. in the two telephone conversations made early in the morning of August 23. We prefer to report vinyl chloride release promptly, even if the report has to be based on incomplete and unverified information. Any corrections to the preliminary verbal report can be made in the written report, as I have done in this instance.

Action taken to minimize the release (see §61.65) consisted of:

- Closed in the system by shutting the appropriate valves.
- Implementation of emergency procedures, including activation of the deluge/sprinkler system to minimize vapor cloud formation.

UCC 101743

Mr. Abraham Ferdas
August 31, 1977
Page 2

Airborne concentrations of up to 34 ppmv were registered by the continuous-sequential monitoring system (this system is described in our Leak Detection and Elimination Program, §61.65(b)(8)).

A review meeting was held to thoroughly investigate this incident. Among those in attendance: an Assistant Plant Manager, the Plant Safety Director, a representative of the Environmental Protection Department, personnel directly involved in the incident, including immediate supervisory personnel, and others. As a result of this meeting, it will be standard procedure in the future to have two persons to independently check lines and valving arrangements prior to starting vinyl chloride feed to the system. Also, a written account of the operating error will be provided by the responsible employee for publication and for sharing with his co-workers.

I understand that you regard any substantial release of vinyl chloride to be covered by §61.65. That is, the release might not be at all associated with a relief valve; and any inadvertent and accidental release, even if there is no pre-existing emergency, is to be considered under the conditions set forth by §61.65. Please let me know if I have understood this correctly.

This release has been reported to OSHA, as required by the OSHA regulations.

If there are any questions about this incident, please let me know.

Very truly yours,

J. L. Worstell

J. L. Worstell
Environmental Protection
Coordinator

JLW/pl

cc: Mr. C. G. Beard, II - WVAPCC
Mr. D. M. Myers - WVAPCC
Mr. W. C. Young - UCC

UCC 101744

bc: Mr. T. D. Epps
 Mr. J. F. Erdmann
 Mr. C. E. Fry
 Mr. R. T. Kramer
 Mr. J. R. Soice
 Mr. R. N. Wheeler, Jr.
 Shift Superintendents
 Utility Foremen

UCC 101745