

INTERNAL INVESTIGATIVE REPORT

To: Environmental File

From: M. L. Ashby
Date: March 6, 1986

Interoffice
Communication

Subject: S-402 Relief Valve Incident
of 2/28/86

VISTA

Incident

At 0345 a.m. on 2/28 the relief valve on S-402, the vinyl bauxite bed lifted due to a liquid being pumped to a full system.

Events Leading to the Incident

At 0010 a.m. the Conoco #3 Dock experienced a power failure which shutdown all shore based equipment in the vent recovery system. Loading of a vinyl ship was in progress at the time of the power failure and continued until 0120 a.m. when high pressure on the ship forced a shutdown on the loading pumps at the VCM Plant. At 0345 a.m. a high pressure condition on the dock line was experienced for no apparent reason.

Events Following the Incident

Immediately upon noticing the high pressure on the loading line Charlie Kroske, the Shift Supervisor, called Frank Broxton, Rack Pumper/Loader, over the plant gaitronics system and asked him to open up the dock circulation valve (valve was blocked which is standard procedure for all shutdowns of shiploading operations). The valve was opened and the pressure on the line relieved. No adverse noises, readings on the fpm (fixed point monitor) or smells were noted at the time by Broxton or Kroske. Loading was restarted at 0400 and continued smoothly. At 0715 C. Buller noticed a small "ice ball" type formation on the rupture disc at S-402. Upon examination of the data and facts it was decided to pull the relief valve to check if it could have potentially lifted. Shortly before noon it was discovered, upon inspection, that the relief valve had to have relieved due to bauxite being located above the seat.

Causes of the Incident

It was determined by investigation that at 0345 a.m.

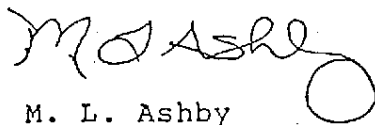
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power was restored to the Dock Vent Recovery Unit and that while restarting all of the equipment the liquid transfer pump (P-626) from the Vent KO Pot to the liquid loading line had started up against the liquid full line.

Recommendations and Conclusions

To prevent a similar recurrence the following actions will be taken.

1. Evaluate modifying the pressure-relief system for the VCM Product loading line such that accidental discharges would be contained. These pressure-relief system revisions would supplement the existing thermal relief protection on the VCM Product loading line. (Please note the existing thermal relief valve relieves back into the VCM Product loading system.) This might include instrumentation or other measures in the loading pump recirculation line to depressure the line back to the VCM storage spheres on high pressure.
2. Recommend that Conoco evaluate the installation of a high pressure alarm and pump shutdown system on the VCM Collection System pumpout line.


M. L. Ashby

kf
cc: RAC-PEM-VMF-SCR-S/S(4)

ENVIRONMENTAL
WHITE PAPER TO
RTF 7/86
TABLE I

REGULATORY CHANGES SINCE 1981

I. SUPERFUND (CERCLA) (EPA-1981)

- A. Reporting is required for over 300 substances, including most VCM Plant raw materials, intermediates, processing supplies, and products.
- B. Community exposure to pollutant levels which may cause adverse impact require newspaper notices.
- C. EPA is conducting followup inspections on most reported releases.
- D. APA notice required for VC releases.

II. RCRA (EPA 1980, DEQ-1983)

- A. Requires release and spill-reporting.
- B. Releases which may affect groundwater require Conoco notification (APA implications).

III. LESHAP (LA. NESHAP-1984)

- A. Same as Federal program with exceptions - certain releases require immediate notification.
- B. Extensive and detailed DEQ followup occurs after each release.
- C. APA notice required.

IV. ENVIRONMENTAL QUALITY ACT NOTIFICATION REGULATIONS (DEQ-1985)

- A. Same list as Superfund, certain chemicals have short term release reporting requirements - immediate notification.
- B. Broader scope of reporting requirements than I-III above.

V. LOUISIANA RIGHT-TO-KNOW (Department of Public Safety)

- A. Same list as IV.
- B. Shorter time for reporting, duplicates but does not eliminate I-IV.