



Dow Canada

Dow Chemical Canada Inc.
Western Canada Division
P.O. Bag 16, Highway 15
Fort Saskatchewan, Alberta, Canada
T8L 2P4

August 31, 1995

To: Hasmukh C. Shah, PH.D.
Manager, Vinyl Chloride Panel
Chemical Manufacturers Association
2501 M Street, N.W.
Washington, D.C. 20037

RE: Letter to the AAR Requesting a Standardization of Tank Cars in Vinyl Chloride Service.

Dear Hasmukh:

Vergel Perry has forwarded to me, a copy of your letter to the AAR in which you have requested a standardization of the tank cars in Vinyl Chloride service.

The Dow Chemical Vinyl Chloride operations in Fort Saskatchewan, Alberta is at present the only producer of VCM in Canada and I would like to say that we support any efforts made to standardize the vinyl chloride tank cars.

The production unit was started up in the fall of 1979. Approximately 2/3 of our product is transported by rail. During normal operations we maintain a fleet of 270, 105J300W tank cars. This is very consistent even though in the past, this number has increased by up to 150, 112J340W tank cars.

All of the tank cars in our normal fleet are equipped with the 20" manways. We have a mixture of the two sizes of safety valves within the fleet, as well our fleet was initially supplied with 3" ACF ball valves. We quickly found that the 3" valves created a problem if a capping kit was to be applied. Because of this problem we designed and manufactured a modified capping kit. This gave us the ability to handle the 3" valves as well as a number of different valves that we encountered on the 112J340W tank cars.

On a side issue, there are two other projects that we have been working on over the last four years that involve our vinyl chloride tank car fleet. The first was the elimination of the sample valves and the second was conversion from the 3" valves to 2" Midland A-720 angle valves with modified die-formed graphite packing. Both of these projects were driven by and have proved very beneficial in the dramatic reduction of fugitive emissions within the fleet.

If you have any questions, please give me a call.

Brian Mullen
VCM/EDC Process Supervisor
403-998-8964
(MULLEN) Standardization Request

cc: Vergel Perry
Prasad Puttagunta

CMA 110290