

CHEMICAL MANUFACTURERS ASSOCIATION
Vinyl Chloride Panel
Transportation Committee
Record of Meeting

Date: March 30, 1995
Time: 8:30 a.m. - 3:00 p.m.
Place: CMA Offices
Washington, D.C.

List of Attendees:

Ludi Benner (PT)	Benner and Associates
Mike Donahue (PT)	Benner and Associates
John Klimavicz	Georgia Gulf Corporation
Gerry Jordan	PPG Industries
George Marshall	OxyChem/OxyMar
Vergel Perry	Dow Chemical
Frank Rowland	Formosa Plastics
Carol Toth (PT)	Keller and Heckman
Richard Wagner	Borden Chemicals and Plastics
Bob Wronko	The GEON Company
Kim Reed	CMA
Has Shah	CMA

- 1.0 The October 18, 1994 Record of Meeting was approved as written.
- 2.0 Has Shah reported that the last revision to the VCNet map was in August, 1993. Ludi Benner provided the Panel members with a hand-out to gather information for updating the map. Panel members will complete the hand-out indicating changes in routes and destination points and return the surveys to Dr. Shah. Dr. Shah will contact Vista Chemical and collect any update information needed for the map. Rail car ton mile information for 1994 will be due to CMA in July. Mr. Benner will prepare a form to receive this information from Panel members. Dr. Shah will distribute the form to Panel members in May. Mr. Benner will add the railroad and CHEMTREC emergency numbers to the map.
- 3.0 Dr. Shah reviewed the status of company commitments and payments for 1995. Dr. Shah will send commitment forms to Borden, Formosa Plastics, and Georgia Gulf Corp. Gerry Jordan will check on the status of PPG's payment.
- 4.0 Dr. Shah reviewed the recent accomplishments of the Panel including: development of the VCNet map; determination of for-hire contractors; drafting of the VCNet brochure; development of training sessions on vinyl chloride; and, the negotiations with OSHA and DOT on vinyl chloride issues. Recently, the Panel was successful in reaching an understanding with OSHA concerning the

entry of response personnel into unknown atmospheres or into concentrations greater than the lower explosive limit for emergency response purposes. OSHA, in response to the Panel's concerns that this provision is misleading, agreed that failure to respond to leaks of vinyl chloride could lead to catastrophic situations with greater life-threatening potential. OSHA will allow entry for emergency response purposes in the interest of protecting worker safety provided the responders have undergone HAZWOPER training.

The Panel discussed future plans and activities. Panel members suggested increased involvement in workshops and seminars on emergency response. Mr. Jordan will send the address of the Chlorine Institute contact to Dr. Shah so that Dr. Shah can coordinate a vinyl chloride presentation at the Chlorine Institute workshop in California in September. Frank Rowland will contact the Vinyl Chloride Safety Association and Dr. Shah will contact the Vinyl Institute, the Compressed Gas Association and the Association of American Railroads to determine if the Panel can volunteer its training services to these groups at upcoming meetings.

Mr. Rowland, Bob Wronko and Richard Wagner will develop an outline of a vinyl chloride presentation by the end of April. Dr. Shah will distribute the outline to the Panel for review prior to the next Panel meeting.

Vergel Perry and Dr. Shah will contact Emergency Response Resources and send a request for proposal to them as a potential for-hire contractor for VCNet. Dr. Shah will request a list of ERR's response capabilities.

Issues regarding marine or pipeline transportation of vinyl chloride will be addressed by the individual shippers.

The Panel will hold a CHEMTREC emergency response drill following the revisions to the map and operation manual.

Mr. Marshall reported that Occidental Chemical will sponsor a TRANSCAER program on April 4, 1995 in Victoria, TX on chlorine. A presentation on VCNet will be included in the program. Dr. Shah will contact CMA's TRANSCAER Division to determine how the Panel can get involved with TRANSCAER programs.

- 5.0 The Panel reviewed the draft brochure prepared by Mr. Klimavicz. Mr. Klimavicz will revise the U.N. number and proper shipping name to reflect recent changes. Borden's company headquarters address will be changed also. Panel members should send any further comments to Mr. Klimavicz as soon as possible.
- 6.0 Dr. Shah reviewed the March 15, 1995 letter (see attached) from OSHA on the clarification of the Application of the Vinyl Chloride Standard and the Hazardous Waste Operations and Emergency Response Standard. OSHA

agreed that entry into unknown atmospheres for the purpose of emergency response to prevent catastrophic situations or explosions is allowable under HAZWOPER provisions as long as responders are properly trained in HAZWOPER. The OSHA reply was in response to a letter from the Panel requesting clarification on the issue. The Panel considers the response to be an appropriate interpretation of the HAZWOPER provision.

- 7.0 The Panel reviewed the draft letter to the American Association of Railroads prepared by Carol Toth requesting AAR to docket a proposal to consider standardizing capping kits for newly constructed rail tank cars in VCM service. The Panel agreed to change references to Midland capping kits to, "any current VCM capping device or projected capping device." Ms. Toth will prepare a second draft for Panel review.

The next AAR meeting is scheduled for July. The Panel plans to submit the letter to AAR in the next few weeks and ask to be included on the July agenda. At a second, closed meeting following a formal comment period, AAR will vote on the proposal. Dr. Shah will clear the letter through the CMA Distribution Committee.

- 8.0 Mr. Marshall distributed a revised list of vinyl chloride tank cars in use. Information on the year the tank cars were built should be sent to Mr. Marshall for inclusion in the list. Mr. Marshall will make the list available to Mr. Klimavicz and Mr. Rowland on disk.
- 9.0 Ms. Toth reviewed the recent changes to HM 215A from the Department of Transportation. The shipping name, "Vinyl Chloride Stabilized" will be required on all tank cars beginning October, 1996. The change will be required on the rail car stencil but not on the placard. Mr. Klimavicz will incorporate the new shipping name into the VCNet brochure.
- 10.0 Ms. Toth reviewed the DOT proposed registration fee increases in the hazardous material regulations. A tiered fee schedule with the highest tier at \$5,000 for hazardous materials in bulk packages is proposed. The fee increase poses a significant burden on carriers and shippers. CMA plans to file comments on the rule. No Panel comments will be submitted.
- 11.0 The Panel discussed the regulatory status of the Oil Pollution Act of 1990. On March 13, 1995, the Coast Guard and industry representatives met to discuss issues regarding spill response plans. Spill response plans are required for all marine transport methods under OPA 1990. However, different agencies are requesting different spill response plan formats. The EPA, Coast Guard and other agencies are attempting to develop a single plan format. Mr. Marshall will update the Panel on further developments.
- 12.0 Mr. Marshall and Mr. Perry are working on a VCNet video script. The objective of the video is to promote training for the safe handling of vinyl chloride during

loading and unloading procedures. Mr. Perry will send a copy of the phenol video to Mr. Marshall for review. Mr. Marshall and Mr. Perry will send a rough draft of the video script to Dr. Shah prior to the next Panel meeting for distribution to the Panel for review.

- 13.0 The Panel discussed potential vinyl chloride training sessions. Bob Wronko will contact Conrail to develop a training program in Niagara Falls, NY. Mr. Marshall will conduct a TRANSCAER program on chlorine including a presentation on vinyl chloride in Victoria, TX. Frank Rowland will investigate a possible session in Pt. Comfort, TX, and Mr. Klimavicz will talk to Delaware Valley, NJ officials about a possible session.

- 14.0 The Panel discussed the one-day vinyl chloride training program manual developed by Mr. Marshall. The following sections were assigned to Panel members for review and update:

Section 1	Introduction	Has Shah
Section 2	TRANSCAER	George Marshall
Section 3	VCNet	Vergel Perry
Section 4	Properties and Toxicology of VCM	George Marshall
Section 5	Protective Cover Arrangement	Gerry Jordan
Section 6	ENVIROTIPS	Vergel Perry
Section 7	Transportation of VCM Domestically	John Klimavicz
Section 8	Monitoring	Frank Rowland
Section 9	Personal Protective Equipment	Vergel Perry
Section 10	VCNet Team and Contractor Locations	John Klimavicz
Section 11	VCNet Responders and the Incident Command System	Vergel Perry
Section 12	Capping Leaking Containers	Gerry Jordan

Dr. Shah will distribute copies of the appropriate sections to Panel members. Panel members will review and update the sections and return comments and changes to Dr. Shah. The first one-day training sessions tentatively is scheduled for fall, 1995.

- 15.0 The Panel held and information exchange session.
- 16.0 The next Panel meeting is scheduled for June 6, 1995 at the CMA offices in Washington, D.C. at 8:30 a.m. The following meeting will be held in Pt. Comfort, TX, at the Formosa Plastics facility on November 9, 1995 at 8:30 a.m.
- 17.0 Dr. Shah distributed the financial statement. Dr. Shah will send a copy of MAXROY's commitment form to Mr. Marshall who will follow-up with MAXROY on the commitment.

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18.0 The meeting adjourned at approximately 2:15 p.m.



Hasmukh C. Shah, Ph.D.
Manager, Vinyl Chloride Panel

Subject to Approval