

CertainTeed

CertainTeed Corporation
Lake Charles Polymer Plant

To: SEE BELOW

LCH #283

From: C. A. Gellner

LCH #283

Subject: VCSA ANNUAL MEETING

Date: November 9, 1990

TO: ROD BOLlich
BRUCE BROCKA
FRANK CONRAD

NORMAN STINE
DON VERONIE

The annual meeting of the VCSA was held in Bermuda on September 27 and 28, 1990. The attached agenda describes the meeting agenda for the two (2) days. I have attached some of the key articles for your reading. The first one is a Hazardous Waste Toxicity Characteristic, by Joseph Ledvina. The second one is an EDC Plant Study Results by Mr. Snow of European Vinyl Corporation. The third one is a report by Formosa Plastics on Waste Minimization/Conservation Program, mainly revolving around their Delaware City Plant. You should find these various articles good reading and always look for ways we can apply some of this information to improve our facility.

Several true confessions were discussed.

1. EDC CRACKER FIRE - OxyChem had an EDC Cracker Fire that did significant damage to their Houston facility. The fire caused the facility to be out of service for several weeks. Basically, the fire was started by tube failure which was caused by quench backflow and therefore thermal shock. The tubes used in the EDC Cracker are 8-3/4" diameter Incanel (?) 600 tubes. In these particular furnaces, they had four (4) of them; No. 1 and No. 2 were started up in 1971 and they were retubed partially with centrifugally cast tubes in 1981. When you look at the details of the fair analysis which was done by a Company out of Houston, it was determined that the tube had a total of 360 degree failure

CTL019608

near a welt in the hot zone. It was described to be a one time thermal failure, ductal, starting at or near the top side of the tube. The actions taken were to never again use centrifugally cast tubes, but only raw tubes. Also, to install auto quench isolation valves to eliminate the possibility of backflow.

2. B.F. GOODRICH FATALITIES - During the year, B.F. Goodrich had three (3) fatalities. All had to do with outside contractors. One fatality occurred at the Calvert City, Kentucky plant. Two fatalities occurred at the Henry, Illinois plant. At the first plant, basically, they had three (3) outside contractors working in a type of pit that really contained (almost like you can view the dike around our Day Tank) some piping and a tank and so forth. Basically, they were up to their knees in some kind of material and were doing some volatile checking, but nothing significant. They did not have any standby or safety watches from the company. These people were using conventional tools, basically electric saws. The saw apparently sparked some vapors causing a significant fire in the pit which killed one of the individuals and badly burned the others. In the second incident in Henry, Illinois, two (2) workers were working on a decommissioned tank to remove the rusty bolts from a manway cover. They proceeded with an acetylene torch to cut away the bolts and as they did, they apparently had an explosion of the mixture in the tank, even though it was not a hydrocarbon tank. It basically blew the top off of the tank and killed both workers. Again, in looking at these two (2) incidents, we need to re-insure that the safety techniques and procedures are in place so that these types of mishaps can never occur at our facility. The actions taken by B.F. Goodrich out of these challenges were: one, to provide a continuous LEL monitoring during any work in a hazardous area;

two, they must have a written approved plan for every hot work; three, they must personally review any alternatives to the work being done (for example, for the tank, instead of using an acetylene torch, they should have used hand wrenches and taken a little more time); and, four, detailed lists for isolation and preparation for hot work. Another action taken was to review the isolation with all workers involved.

Rod, particularly on these action points, you and Bruce need to work together, with you heading it up, to review all of our hot work permits and we should look at implementing these actions to improve our hot work permitting. I would like to see your feedback on these actions by the end of November.

There are several other potential action points that came to my attention during the VCSA meeting in Bermuda. I am going to list these and I would appreciate your feedback on implementing these action points.

1. Relief valves and/or rupture disks - Should we have a high pressure alarm to the Control Room?
2. Leak Patrol - What is the present requirement from the Government as to what distance from a potential leak in a flange should we be measuring?
3. Air Permit - When is our air permit with the State of Louisiana up for renewal? Should we consider calculating fugitive by calculations as we do presently or by some bagging technique?
4. Water Well - What is the present technology to acidize a water well correctly and dispose of the waste environmentally correct?

5. Steam - What is our present operating condition on cold water to back up on the steam lines during some kind of challenge?
6. Original Day Tank - Do we presently have a level device grounding, etc. to make sure that we are safe on the original Day Tank?
7. Outside Contractors - What is required to improve our outside contractors safety and training and sign-off?
8. Chill Water Tank - What do we need to do to monitor and/or ground to be more safe in the Chilled Water Tank?
9. Degassing Procedure - What do we need to do to re-optimize the degassing procedure while maintaining low PPM's?
10. VCM Transport Committee - Would it be interesting for PPG to look at implementing a group like to Delaware Valley Group to look to improving the safety for VCM transportation in our area along with the railroads.

VI SAFETY COMMITTEE MEETING ON SEPTEMBER 26

A meeting of the VI Safety and Environmental Committee was held on September 26, 1990 in Bermuda. Most members were present. The exceptions were Dow, whose people were not present because they are doing less traveling. Also, PPG was not present but we are not sure why since they normally attend. Borden was not present because their committee representative would be changing. Air Products was not present because they were bought out by PW Pipe and it is not known at this time if PW Pipe will become a member of the Association.

The meeting notes will follow and will be copied to the people of this memo. Basically, I will make a few comments that I think are important and/or some action points from the meeting.

CTL019611

One of the main subjects handled was ground water contamination. This ground water contamination was mainly from EDC around VCM Plants. It was noted that it is very difficult to get any agreements amongst Government and industry on what is a correct clean-up level. B.F. Goodrich noted that in Calvert city they are pumping 350 GPM, they are steam stripping it and they are getting about 100 PPB EDC at the outfall and they feel the test is good to 0.1 PPB. Vista in Lake Charles is pumping 50 to 100 GPM with several wells, they are stripping and they also still have service impairments. Georgia Gulf is doing some pumping and they are using TetraTech Technology for stripping and they are suppose to be forwarding some information on TetraTech Technology.

Another important issue was reporting, particularly under Circla. Oxy said they feel VCM is exempt from Circla. VCM is not on SARA which I don't understand. They said they would report any non-routine release if created in one (1) pound. They said routine is determined by the plant; i.e., repairable valve, flange leaks, etc. are called routine. Non-routine, on the other hand, would be a blown out flange gasket. Vista, during this discussion, said that basically they feel relief valves are covered under LESHAP and therefore would not be reportable. On the other hand, Shintech, John Young reported, does report relief valve releases. One important thing that we have to determine as part of our emergency procedures is what is routine and insure that we report at routine and non-routine. The additional actions that were taken from this meeting were reported separately under the VCSA meeting action points. Again, when the notes come in from the VI in a few weeks, we will forward to you for your comments.

CTL019612