



Interoffice Communication

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To VCM Plant Employees
From J. A. DeBernardi
Date February 9, 1981
Subject Deregulation of Area #4 - Tank Car Loading Pumps

I am pleased to report that based on analysis of data generated by the Honeywell fixed point monitor, personnel dosimeter sampling results, and normal time intervals employees are in the tank car loading pump area, this area has been deregulated effective February 9, 1981. The data analyzed indicates during normal operation that potential employee exposure over the OSHA permissible limit for VCM has been eliminated in this regulated area.

These results can be attributed to engineering changes and improved work practice controls that have reduced or eliminated such exposures in the tank car loading pump area during normal operations.

1. A closed sampling system for VCM has been installed which vents to the incinerator system.
2. Tandem pump seals have been installed on the loading pumps with seal oil pots vented to the incinerator system.
3. Rupture disks have been installed under relief valves in this area to protect the valves from premature discharge.

The fixed point monitoring point located in the tank car loading pump area will continue to function as an exposure warning system. Notification of excess VCM concentrations will be made from the control room to personnel in the area should they occur. Appropriate respiratory protection equipment will be used by personnel should this occur until the problem causing the excess concentration is found and eliminated.

Deregulation of this area does not alter our established procedures related to use of respiratory protection equipment when breaking into process lines or vessels, or the necessity to seek out and repair leaks that may occur in the area or in other areas of the general plant.


J. A. DeBernardi

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Safety Bulletin Boards
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