

To: Don Taylor
Maralee Marchant

cc: Charles Douglas

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C-1C Skirt Confined Space Entry

The Solvents/EDC 1 Plant will perform a confined space entry into the skirt of C-1C (Per/Tet reactor quench column) to open the bottom drain valve. It is necessary to open this valve to perform maintenance while the plant is shutdown for the E-540 replacement project.

The confined space entry into the C-1C skirt will be short in duration, as the expressed purpose is to **only open the bottom drain valve**. The person entering the skirt of the column will be wearing positive-pressure breathing air-line respiratory protection, nitrile rubber gloves, neoprene rubber boots, and Nomex clothing with a paper-suit coverall.

The vessel (C-1C) will contain it's original contents (carbon tetrachloride, perchloroethylene, chlorine, hydrogen chloride, hexachlorobenzene, hexachlorobutadiene, and hexachloroethane). However, the scope of the job does not include equipment or line opening and personnel exposure potential should be minimum.

The plant will conduct air quality sampling as per Dow North American Safety and Loss Prevention Standard LAD-5. However, the hexachlorinated compounds listed above will not be sampled for with the approval of the Louisiana Operations Industrial Hygiene Department as per LAD-5.V.C. (page 58).

The plant will generate a temporary Management of Change to accommodate this procedure. The Microsoft Exchange mail system will be used to communicate this to the appropriate Plant and Industrial Hygiene personnel and they will confirm their approval via the same method. A printed copy of th confirmation mail messages will be attached to the MOC form as documentation of approval.

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