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TO: Distribution

FROM: S. V. Corkran

DATE: June 21, 1989

Interoffice
Communication

SUBJECT: Spill Prevention, Control, and
Countermeasure (SPCC) Plan
Lake Charles VCM Plant

VISTA

Attached is the updated LCVCM SPCC Plan. This update should be incorporated into Section IV of the LCVCM Environmental Information Manual; all material currently in this section should be discarded. Also, any old copies of the SPCC plan should be discarded. This plan reflects Louisiana regulations which require the Plan's scope to include all hazardous chemicals listed under RCRA (LAC 33:Vol.11 Section 3927). To our plant this means that the precautions taken to prevent and contain oil spills must also be applied to sulfuric acid, Nalco Cooling Tower chemicals, phosphoric acid, etc.

The sections of the SPCC Plan of most direct use to plant personnel are VI-VIII and Appendix C-E. Please carefully read these sections of the plan. Each department must contribute to the effectiveness of this plan, so please contact me if you have any questions.

Several modifications to the plant must be made to comply with the regulations. The following items must be completed as soon as possible but in no case later than June 1, 1990:

1. Plug culverts through which pipes are run through tank farm dike walls to seal openings.
2. Repair cracks in concrete dike wall.
3. Install a dike around the caustic storage tanks located next to the Tank Farm.
4. Revise the tank car loading area to provide adequate spill containment.
5. Provide permanent containment for frac tanks at the copper pit or eliminate utilization of frac tanks.

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6. Institute procedure to check copper pit daily to ensure a minimum of 12 inches of freeboard to minimize risk of overflowing during a rainfall event.
7. Install an open drainage line from the Incinerator Unit caustic storage tank (T-986) dike to the CPS system.
8. Ensure that drainage of the oil drum storage area and the steam cleaning pad does not go to a stormwater ditch.
- 9) Install containment around the diesel fuel tank at the fire training area.

In addition to the above modifications, the following revisions are recommended by the SPCC/Stormwater Segregation QMP Team to further protect against spills:

- 1) Install "Open Valve Only During Supervised Drainage" signs on dike drains to the stormwater ditch at T-960 A/B, T-962 A/B, Tank Farm dike, and lab sewer sump pumps P-801 A/B dike.
- 2) Remove T-955 (H_2SO_4 storage tank at CT-950) from area or repair the containment and install a drainage line to the process area CPS system before the tank is put back in service.
- 3) Color code drainage catch basins that are not routed to the wastewater treatment system.
- 4) Provide the Shift Supervisor with a color-coded plot plan that indicates drainage routes from all areas of the plant.
- 5) Provide containment, temporary or permanent, for the portable caustic storage tank located near T-534 A/B.

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