Eddie FYI & Use. This is a procedure that you should be familiar with. Jo. Ott.

CHEMICALS — PPG INDUSTRIES — INTEROFFICE / LAKE CHARLES

TO Plant B Shift Supervisors and General Foremen **DATE** March 18, 1985

FROM J. A. Hart/S. L. White **SUBJECT** Environmental Incidents

As a result of the recent enforcement action against PPG for the failure to report an environmental incident, we all must be keenly aware of the reporting procedures to be followed. Furthermore, as a result of the current political climate, we must greatly reduce the number of releases we have been experiencing.

The following procedures will be followed by all in the event a release occurs on back shifts and weekends.

1. Any release (as defined below) will be verbally reported to the Shift Superintendent who will report it to the Environmental Department. Indicate on the written report who in the Environmental Department the Shift Superintendent contacted.

   Critical Points:

   a. If the release occurs in an area covered by the VCM regulations, then the Environmental Department must notify the DEQ within three (3) hours.

   b. It is critical that all possible chemical components in the release be reported to the Environmental Department.

   c. It is very important that a good estimate of the quantity of each component released be provided to the Environmental Department.

   d. If there is any question or doubt, call the Unit Foreman or duty man immediately.

2. The Environmental Department will make the decision on whether an incident is reportable to the regulatory agencies. Therefore, all release incidents that fit the definitions given below must be reported to the Environmental Department.

3. A written Environmental Incident Report will be prepared on all incidents that fit the definition of a release given below regardless of whether or not they are believed to be reportable to regulatory agencies.

   Procedure: Two copies of the report will be made and routed by the Shift Supervisor. Use the routing slip to assure that each copy follows correct route and can be easily identified.

   1) One copy, labeled preliminary, is routed to the Production Superintendent, Operations Superintendent, and Plant Manager. It must be on the Plant Manager's desk by 12:00 noon on the day following an incident.

2) The second copy (which will be the final copy) should be delivered to the Unit General Foreman or duty man at 7:30 AM on the morning following an incident.

4. Finalization and verification of the components and quantities will begin by 7:30 AM on the morning following any incident that occurs after 4:00 PM any day of the week. The duty man should be contacted on weekends. He will come out and perform this task.

Critical Point:

If any error is found in the preliminary report, notify the Environmental Department immediately.

5. The final report must be prepared by the Unit Foreman and approved by the General Foreman. All follow-up information and calculations should be attached to the final report. The final report must be submitted to the Environmental Department by 4:00 PM on the 4th day following the incident.

The following procedures will be followed by all in the event a release occurs on Monday-Friday days.

1. Any release (as identified below) will be verbally reported to the Environmental Department by the Unit Foreman involved.

Critical Points:

a. If the release occurs in an area covered by the VCM regulations, then the Environmental Department must notify the DEQ within three (3) hours.

b. It is critical that all possible chemical components in the release be reported to the Environmental Department.

c. It is very important that a good estimate of the quantity of each component released be provided to the Environmental Department.

2. The Environmental Department will make the decision on whether an incident is reportable to the regulatory agencies. Therefore, all release incidents that fit the definitions given below must be reported to the Environmental Department.

3. A written Environmental Incident Report will be prepared on all incidents that fit the definition of a release given below regardless of whether or not they are believed to be reportable to regulatory agencies.

Procedure: Two copies of the report will be made and routed by the Unit Foreman.

1) One copy, labeled preliminary, is routed to the Production Superintendent, Operations Superintendent, and Plant Manager. It must be on the Plant Manager's desk by 4:00 PM on the day of the incident.

2) A second copy (which will be the final copy) should be prepared by the Unit Foreman and approved by the General Foreman.

3) Use the routing slip to assure that each copy follows correct route and can be easily identified.

4) The preliminary copy can be eliminated if the final copy can be prepared by the 4:00 PM deadline on the day of the incident.

4. If any errors are found during final report preparation, notify the Environmental Department immediately.

5. The final report must be prepared by the Unit Foreman and approved by the General Foreman. All follow-up information and calculations should be attached to the final report. The final report must be submitted to the Environmental Department by 4:00 PM on the 4th day following the incident.

Attached please find a new Environmental Incident Report form. Please destory all old forms and begin using this form immediately. Also, a new routing form for preliminary and final reports is attached. Please begin using this immediately.

Also attached are:

1) Definition of a release including PPG internal reportable quantities.

2) Definition of units and SRV's covered by the Vinyl regulations.

/bjm

Attachments

cc: J. E. Fike/E. J. Tullier
Shift Superintendents
W. J. Peard
R. L. Jones

SL 043669

THE FOLLOWING ARE DEFINED AS RELEASES WHICH MUST BE REPORTED TO THE ENVIRONMENTAL DEPARTMENT IF THE QUANTITY INVOLVED EXCEEDS THE AMOUNT GIVEN ON THE ATTACHED LIST.

- A spill of any liquid organics or oil on the ground.

- A spill of any liquid chemicals such as cooling tower treatment chemicals, Dowtherm, or still aids on the ground.

  It is not a reportable release if a dry solid (such as a catalyst) is spilled on the ground, however, it must be cleaned up since rain could cause a reportable release.

- A spill of any liquid volatile organics even if to a contained concrete pad. In this case, volatile is defined as anything with a boiling point below Trichloroethane (TCE).

  It is not a reportable release if a non-volatile liquid is spilled to a contained concrete pad such as those that drain to the lift stations and go to the WTU.

- The bypassing or the anticipated bypassing of the primary environmental control device for more than four (4) hours for any organic, HCl or Cl_2 gas or vent streams. The primary control device could be, for example, the incinerator, scrubber, or a refrigerated vent condenser.

- The release of any organics, HCl or Cl_2 from an SRV, a rupture disk, a leak (for example, due to corrosion or equipment failure) or improper opening of a line, valve or vessel.

- Any incident which results in visible and/or odorous emissions which could escape the Complex fenceline.

IN ADDITION TO THE ABOVE, THE FOLLOWING ARE DEFINED AS RELEASES WHICH MUST BE REPORTED TO THE ENVIRONMENTAL DEPARTMENT FOR THOSE UNITS COVERED BY THE VCM REGULATIONS:

- Non-incineration of the vents from any of the units covered by the VCM regulations for greater than one hour.

- Bypassing of the CSS or failure of the CSS to remove VCM to less than 10 ppm in the effluent.

- Any release from an SRV in vinyl service.

- The escape of VCM due to sudden piping or equipment failure (line or vessel rupture/failure as opposed to non-sudden failure, e.g., drips).

REPORTABLE AMOUNTS

A release of any amount into the environment of material containing any of the following components:

1. chlorine
2. 1,2 trans-dichloroethylene
3. 1,1-dichloroethane
4. ethyl chloride
5. hexachloroethane
6. methylene chloride
7. perchloroethylene
8. tetrachloroethane (sym and unsym)
9. 1,1,2-trichloroethane
10. 1,1,1-trichloroethane
11. vinyl chloride
12. freon 12

A release of $\geq$ 100 lbs. into the environment of any other chemical.

PREPARED BY _____

ENVIRONMENTAL UPSET
CHEMICAL RELEASE

PLANT B ENVIRONMENTAL INCIDENT REPORT

DATE & TIME OF INCIDENT _____

SPECIFIC LOCATION _____

DESCRIPTION OF INCIDENT _____

WAS THERE A RELEASE? _____ IF SO, WHAT COMPONENT? QUANTITY? AIR/GROUND/WAT

IF VC RELEASE, WAS IT DETECTED BY MONITOR OR LEAK PATROL? _____

		LBS	
		LBS	
		LBS	
		LBS	
TOTAL		LBS	

DESCRIPTION/SOURCE, CAUSE & DURATION _____

WEATHER CONDITIONS(Circle One): Clear Partly Cloudy Cloudy Rain

WIND SPEED & DIRECTION (if a gas release) _____ mph _____

IMMEDIATE ACTIONS TAKEN: _____

NOTIFICATIONS (Who & When)

Shift Superintendent _____ _____
(Name) (Date & Time)

Environmental _____ _____
(Name) (Date & Time)

Other _____ _____
(Name) (Date & Time)

1. Attach action plans to prevent recurrence and/or follow-up plans to final copy.
2. Attach release calculations to final copy.

FOR USE BY ENVIRONMENTAL DEPARTMENT ONLY

NOTIFICATIONS MADE (Agency, Name, Time): _____

REASON REPORTED/NOT REPORTED: _____

OTHER COMMENTS: SL 043672

ROUTING

PREPARED BY: _____

PRELIMINARY

ENVIRONMENTAL INCIDENT REPORT

SHIFT SUPERINTENDENT CONTACTED ? _____
EVE/NIGHTS/WKND-BY SHIFT SUPERVISOR — DATE/TIME/INIT.

ENVIRONMENTAL CONTACTED ? _____
DAYS-BY FORMAN EVE/NIGHTS/WKND-BY SHIFT SUPT. — DATE/TIME/INIT.

FINAL COPY BEING PREPARED ? _____
DATE/TIME/INIT.

SHIFT SUPERVISOR GIVE DATE/TIME COPY DELIVERED TO GEN.FORMAN (MUST BE BY 7:30 A.M. MORNING FOLLOWING INCIDENT-- CALL DUTY MAN ON WEEKENDS)

UPON COMPLETION OF ABOVE QUESTIONS ATTACH REPORT AND DELIVER TO PRODUCTION SUPT.-PLACE IN SECRETARY'S ENVIR. INCIDENT BOX

COPY TO ENVIRONMENTAL FOREMAN(BY SECRETARY)? _____
DATE/TIME/INIT.

PRODUCTION SUPT. APPROVAL _____

OPERATIONS SUPT. APPROVAL _____

COPY TO PLANT MANAGER BY 4:00 PM ON DAYS
COPY TO PLANT MANAGER BY 12:00 NOON ON DAY FOLLOWING
IF AFTER 4:00PM OR 12:00 NOON ON MONDAY FOR WEEKENDS

COPY TO ENVIRONMENTAL DEPT. BY SECRETARY AFTER APPROVAL

SL 043673

PREPARED BY: _____

ROUTING

ENVIRONMENTAL INCIDENT REPORT

FINAL COPY

SHIFT SUPERINTENDENT CONTACTED ? _____
EVE/NIGHTS/WKND-BY SHIFT SUPERVISOR — DATE/TIME/INIT.

ENVIRONMENTAL CONTACTED ? _____
DAYS-BY FOREMAN EVE/NIGHTS/WKND-BY SHIFT SUPT. — DATE/TIME/INIT.

PRELIMINARY COPY TO PRODUCTION SUPT. ? _____
DATE/TIME/INIT.

SHIFT SUPERVISOR: UPON COMPLETION OF ABOVE QUESTIONS DELIVER TO UNIT FOREMAN BY 7:30AM ON MORNING FOLLOWING INCIDENT

GENERAL FOREMAN APPROVAL _____

PRODUCTION SUPT. APPROVAL _____

OPERATIONS SUPT. APPROVAL _____

PLANT MANAGER _____

ENVIRONMENTAL _____

FINAL COPY MUST BE DELIVERED TO ENVIRONMENTAL DEPT. BY 4:00 P.M. ON THE FOURTH DAY FOLLOWING THE INCIDENT.

SL 043674

UNITS COVERED BY VCM REGULATIONS

I. ALL OF VCM-II (including VC Unit, OHC Unit, Purification and VC Storage Area)

II. CENTRAL STEAM STRIPPER

III. T/E-II (from inlet to Cracker to overhead of Vinyl Stripper)

TRI-ETHANE II VINYL SERVICE SRV's

Quench Tower
Quench Liquor Tank (86-301)
Quench Liquor Tank (86-329)
VC-HCl Still (86-302)
VC-HCl Still (86-328)
VC-HCl Reflux Drum (86-304)
VC-HCl Reflux Drum (86-309)
VC-HCl Reflux Dryer
VC Stripper (86-320)
VC Stripper (86-327)
VC Stripper Reflux Drum (86-323)
VC Stripper Reflux Drum (86-331)
VC Stripper Reflux Dryer

STORAGE AREA VINYL SERVICE SRV's

VC Day Tank #1
VC Day Tank #2
VC Day Tank #3
VC Day Tank #4
VC Day Tank #5
VC Day Tank #6
VC Day Tank #7
VC Day Tank #8
VC Sphere #3 NW
VC Sphere #3 SW
VC Sphere #3 SE
VC Sphere #3 NE
VC Sphere #1 East
VC Sphere #1 West
VC Sphere #2 East
VC Sphere #2 West
Vinyl Transfer Line

VCM-II VINYL SERVICE SRV's

HCl Knockout Drum
Quench Liquor Drum
Stripper
Product Still Feed Drum
Product Still Reflux Drum
Product Still
Humidifier
#1 Neutralizer
#2 Neutralizer
#3 Neutralizer
Neutralizer Drain Drum
Caustic Storage Vessel
Waste Storage Drum
VCM Bullet No. 1
VCM Bullet No. 2
VCM Bullet No. 3
VCM Bullet No. 4
VCM Bullet No. 5
VCM Compressor Suction Drum
VCM High Pressure Condensate Receiver
No. 1 Quench Dopp Kettle
No. 2 Quench Dopp Kettle
Quench Tower
Absorber
Low Temperature Storage Tank No. 1
Low Temperature Storage Tank No. 2
Vaporizer
Deriming Dryer
Dryer Water Drain
VCM Condensate Tank
Deriming Surge Drum
VCM Product to Docks
VCM Recirculation
VCM from S-1, S-2