



UNION CARBIDE CORPORATION
CHEMICALS AND PLASTICS
P. O. BOX 471, TEXAS CITY, TEXAS 77590

October 27, 1977

Mr. Howard G. Bergman
Director, Enforcement Division
U. S. Environmental Protection Agency
First International Bank Building
1201 Elm Street
Dallas, TX 75270

Subject: Status Reports on Compliance Schedules for Waivers for Polyvinyl Chloride Plants, Union Carbide Corporation, Texas City, Texas

Dear Mr. Bergman:

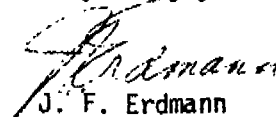
This is the seventh report on the status of our progress on projects for the waiver of compliance schedules as sent to us in your letter of March 11, 1977. This report covers the compliance date of October 15, 1977 for the attached compliance schedules.

Two of the schedules (pages 5 and 8) have Start of Construction dates of October 15, 1977, but both were started on the dates indicated on the attached sheets. The third schedule (page 16) for the Suspension process has not been met because of the explosion reported in our last status report of September 20th.

Both the Non-Solvent and Suspension processes have been shut down since the explosion at the Non-Solvent Unit on September 5, 1977. Presently, evaluations are underway to determine if these facilities should be repaired or permanently shut down. All further construction work in these process units has been postponed until this decision has been reached.

If you have any questions, please refer them to me.

Very truly yours,


J. F. Erdmann

JFE:ir

Attachments: Compliance Schedules, pages 5, 8 and 16

cc: Mr. Cecil Bradford
Texas Air Control Board
8520 Shoal Creek Boulevard
Austin, TX 78758

bcc: Complete Copy
Mr. H. P. Brady

Cover Letter Only

Mr. R. L. Frantz/M. E. Eisenhower
Mr. W. A. Mazzolini/W. T. Gray, Jr.
Mr. R. M. Ewbank
Mr. J. C. Smith - 124
Mr. D. D. Robinson
Ms. R. M. Guardiola
Mr. J. B. Leverton/F. S. Provenzano
Mr. R. N. Wheeler - 514

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UNION CARBIDE CORPORATION
CHEMICALS AND PLASTICS
P.O. BOX 472, TEXAS CITY, TEXAS 77590

October 11, 1977

10/14/77 - Gene Spiller of TACB
Bellaire called -
wants to be sure they
get copy of 5548 report
referred to in the
F/C gram attached.
E

Mr. Howard G. Bergman
Director, Enforcement Division
U. S. Environmental Protection Agency
First International Bank Building
2101 Elm Street
Dallas, TX 75270

Dear Mr. Bergman:

Subject: Autoclave Explosion and Fire, Non-Solvent Resins Process
September 5, 1977, Texas City Plant

In keeping with our intention to keep you and other agencies informed about this incident, the attached Forecaster-Gram was issued last Friday, October 7, 1977. Additional pertinent information will be issued as it becomes available. If you have any questions, please contact me.

Very truly yours,

J. F. Erdmann
J. F. Erdmann
Environmental Protection
Coordinator
(713) 945-7411, ext. 1126

→ VCM FILE this
INCIDENT

JFE:ir
Attachment

cc: Mr. Lloyd Stewart, TACB, Bellaire
Mr. Clark Benson, GCACD, La Marque

bcc: Mr. R. N. Wheeler - 514
Mr. J. D. Martin - 510
Mr. F. S. Provenzano/D. L. Engle (cover only)
Mr. J. B. Levertton/R. E. O'Bryan/EP Files
Mr. M. E. Eisenhour (cover only)
Mr. R. L. Frantz/A. A. Peterson (cover only)
Mr. W. T. Gray, Jr.
Mr. D. D. Robinson

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FORECASTER-GRAM

Texas City Plant

October 7, 1977

A Message from the Plant Manager to All Employees Regarding The Labor Day Fire

Immediately after the Labor Day explosion and fire, we promised to report to you as early as practical. WE HAVE PRODUCED NON-SOLVENT VINYL RESINS AT TEXAS CITY FOR 29 YEARS, AND OPERATORS HAVE SUCCESSFULLY HANDLED ABOUT 3,500 AUTOCLAVE START-UPS. The Corporation has operated other similar units at South Charleston and Aycliff, England, dating back to the early 1940's. NOWHERE IN OUR VINYL HISTORY HAS THERE BEEN ANYTHING LIKE OUR LABOR DAY EXPLOSION. IT WAS A UNIQUE AND TOTALLY UNEXPECTED HAPPENING.

As reported previously in The Forecaster, a Process Investigation Team has been working to reconstruct the situation and determine the cause. The team has issued its preliminary report to me as follows:

"A reaction was experienced of such extreme intensity that it could not be contained by our standard design and operating practices, which are more stringent than those of the industry. Once it was initiated, normal operating actions or emergency procedures could not have brought the reaction under control.

The principal cause of the violent reaction was a large overcharge of catalyst solution - at least 20 times the normal charge of one gallon. There are ways excess catalyst could have been introduced, but the team is unable now, and may never be able, to verify exactly how it happened. In addition, the possible lack of agitation could have been a contributing factor. However, strict adherence to the Standard Operating Procedure would have prevented introduction of excess catalyst and the incident.

The team found no mechanical defects in the equipment, and all safety devices functioned as designed.

To confirm the team's findings, additional investigations are in progress at the Union Carbide South Charleston Technical Center."

As you know, we will transmit the team's final report to the Occupational Health and Safety Administration (OSHA) and to the Industry in hope of preventing another such incident. It's also important to ask ourselves what this accident says about our plant safety program. We asked Dick Graebert, C&P Division Safety Director that question, and he responded with the letter to each of you which is reproduced here.

I am looking at a belt buckle which some plant employees made and gave me marking 5 million safe work hours. This record of 377 days was reached on January 27, 1977. IF ALL OF US CONTINUE OUR COMMITMENT TO PRO-

VIDE GOOD TRAINING, EFFECTIVE PROCEDURES, TIMELY RESPONSE TO DEFICIENCIES AND CONSTANT AWARENESS, WE CAN REESTABLISH THAT RECORD AND THAT SPIRIT. Let's get on with the job.



CHEMICALS AND PLASTICS

INTERNAL CORRESPONDENCE

TO (NAME) - To All Texas City Plant Employees

September 27, 1977

SUBJECT - 1977 Safety Goals

A tragic incident, such as the one recently experienced in the Non-Solvent Vinyl Unit, often causes many to doubt the effectiveness of the plant's overall safety program. This doubt, in turn can cause a temporary loss in the level of SAFETY AWARENESS and it is for this reason that I am writing this letter to each of you.

The well organized teams assigned to evaluate all information associated with the incident should enable us to understand the causes. Knowledge of the causes of the incident can be used to improve the total program where deficiencies are found. This specific incident, however, should not be used as a basis for justifying broad changes in the entire program.

ALL OF THE EMPLOYEES OF THE TEXAS CITY PLANT have demonstrated their ability to work safely over extended periods of time. This ability to work safely is reflected in a steady improvement in performance over recent years. THE EXPERT MANNER IN WHICH SO MANY EMPLOYEES PARTICIPATED IN EMERGENCY ACTIVITIES required by the Vinyl Unit incident is a good example of the effectiveness of Texas City's safety program.

The incident does serve to remind us again how alert everyone must be to avoid the combination of events which lead to any accident, large or small. A GOOD SAFETY PROGRAM REQUIRES THE CONSTANT ATTENTION OF ALL EMPLOYEES. With management's demonstrated commitment to provide good training, effective procedures, and sound design, an ever-present attitude of awareness on the part of each employee will get the job done.



Safety Director, Chemicals and Plastics

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