



TO E. F. Parsons

DATE March 2, 1983

M.G.
EEB

FROM P. S. Trew

SUBJECT Environmental Release
Notification

Per our recent meeting, listed below are examples of the different abnormal operating conditions which could occur in the LP-EDC or VDCM units that must be reported to the Environmental Control Department as soon as they occur.

- (1) Any release of chlorine (Cl₂) which is greater than 10 lbs., or approximately 2 quarts of liquid

CONFIDENTIAL:

Examples:

Subject to Protective Order
of 14th Judicial District Court
No. 91-1145

- (a) SRV releases from Cl₂ vaporizers and Surge Drum
 - (b) Releases from expansion bottles in the liquid Cl₂ transfer lines
 - (c) Any Cl₂ gas leaks where a respirator or full-face mask has to be worn to be in the vicinity of the leak
- (2) Any release of EDC which is greater than 5,000 lbs. or 200 gallons

Examples:

- (a) Releases from rupture disc failure on the EDC stills
 - (b) Releases from rupture disc failure on the EDC reactors
 - (c) Releases from rupture disc failure on the EDC strippers
 - (d) Any spill of EDC to the ground which is greater than 200 gallons, except if the spill is to the process pad
- (3) Any release of VDC which is greater than 5,000 lbs. or 200 gallons
- Examples:
- (a) Transfer line leaks
- (4) Routine or scheduled maintenance on the LP-EDC and/or VDCM vent headers must be reported prior to any maintenance activity
- (5) Emergency diversion of the process waste gases from the incinerator vent headers must be reported if the vents remain out of the incinerator for more than four (4) hours.

/ap

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