
**Louisiana Division
Consolidated Assessment**

**Hazardous Materials
Transportation Review**

Review Date 7/14/96

Location-Division Louisiana

Plant Facility Glycol 1 Loading/ Central Rail Rack

Building(s) Bldg. 1501

Superintendent - Charles Jackson / Stew Serpas Logistics

Major Author Tom Bulger

Review Team Members _____

Chemicals Reviewed:

Propylene Oxide DRI-4

Propylene Dichloride DRI - 3

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HMTR Questionnaires

Introduction

This collection of questionnaires is a part of the Review Package for the Hazardous Materials Transportation Review (HMTR) which will be discussed in the Formal Review during the Consolidated Audit. Complete only the questionnaires that apply to your plant.

Purpose

To provide a basis for discussion, at the Formal Review, of the plant's awareness and understanding of its distribution responsibilities.

Responsibility

The plant superintendent is ultimately responsible for completing the questionnaires and distributing them when completed.

The superintendent may designate a knowledgeable person to complete and distribute the questionnaires.

Deciding which questionnaires to complete

Use this table to decide which questionnaires you must complete.

If you...	Then fill in the...
Are preparing for a HMTR	Emergency Response Questionnaire and Equipment Construction Questionnaire

AND...

If you...	Then fill in the...
Ship bulk materials	Outbound Bulk Questionnaire
Receive purchased materials	Inbound Bulk Questionnaire
Ship or receive materials by marine vessel	Marine Questionnaire
Ship bulk waste materials	Waste Questionnaire

What to do with the completed questionnaire

Distribute to the appropriate Review Committee members, at least three weeks prior to the Consolidated Audit.

Note: Contact your HMTR focal point for the names and numbers of copies to distribute.

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Hazardous Materials Transportation Review HMTR Questionnaires

Name of Material _____

EMERGENCY RESPONSE QUESTIONNAIRE

Resource - Operations, Distribution Emergency Response, Site Emergency Services

1. Who are the Dow "Knowledgeable Plant Contacts" (KPCs) for an en route emergency?

Name Tom Bulger _____ 24 Hr Phone (504) 353-8440

Name A.J. Raymond _____ 24 Hr Phone (504) 353-8440

Name Yvonne Williams _____ 24 Hr Phone (504) 353-8440

Name Lawrence Hughes _____ 24 Hr Phone (504) 353-5733, pager 322-5733

2. How do you document that these contacts are trained and familiar with their role in a distribution emergency response? Ref: 29 CFR 1910.120

Yearly Training as documented in supervision files.

3. For purchased materials, who are "knowledgeable" contacts for an en route emergency?

Supplier Name N/A _____ 24 Hr Phone _____

Supplier Name _____ 24 Hr Phone _____

4. Are ALL inbound raw materials F.O.B. Dow?
That is... Dow accepts ownership when it arrives at Dow's gate.

Yes [] No [] Not Apply [X]

5. Do your plant's Knowledgeable Dow Contacts have a Distribution Emergency Response (E/R) information packet, notebook, or briefcase for the both materials shipped and received?

Yes [X] No [] If "No", why not? _____

One for the plant.

6. What special properties of your material should be made known? _____
Propylene Oxide is flammable ----- PDC - AL

7. What "specialized" equipment and/or resources would be necessary in a transportation incident? Consider: Drager or GasTec sample pump and tubes, explosimeters, absorbent materials, neutralizers, materials of construction, and clean-up and disposal information.

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**Explosive Meter, brass tools, Nomex, EPR "O" rings, Vtion "O" rings, PO and PDC
approved respirator.**_____

8. Is emergency response information included with all shipments made from the plant?
Ref: 49 CFR 172.600

Bulk ☒ Package shipments ☒ No ☐ Not Apply ☐

If " No", why not? _____

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Hazardous Materials Transportation Review HMTR Questionnaires

Name of Material Propylene Oxide and Propylene Dichloride

EQUIPMENT CONSTRUCTION QUESTIONNAIRE

Resource - Distribution Emergency Response, Distribution Regulatory Affairs, Tech Centers

1. What are the acceptable Department of Transportation (DOT) or International Maritime Organization (IMO) equipment specifications? Ref: 49 CFR 172 & 173

Not Known []

Drum (like UN 1A1 or DOT 17E): _____ Not Apply [X]

Cylinder (like DOT 3A): _____ Not Apply [X]

Tank Truck (like MC 307): MC 330 or MC 331 for PO

IMO Bulk Tank (like IM 101): IM10 for PDC

Rail Car (like DOT 111A100): PD-DOT 111A100W, PO-1054100W

Other: _____ Not Apply []

2. Can this material be transported without requiring special local, state, or federal permits or approvals (like: DOT Exemptions or special approvals)? Ref: 49 CFR 107 Subpart B

Yes [X] No []

If " No", please attach copies of the exemptions or approvals.

3. How is the container material of construction verified for compatibility before loading?

Ref: 49 CFR 173.22

Yes, Check sheets / TEDER sheets/ Spec Plate / NEW ACFX T/C's non AL

4. How is the gasket material verified for compatibility before loading?

Ref: 49 CFR 173.22

PO - Tags on PS stamped "EPR "O" Rings"

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Name of Material Propylene Oxide and Propylene Dichloride

OUTBOUND BULK QUESTIONNAIRE

Resource - Manufacturing, Distribution/Traffic, Distribution Regulations, Industrial Hygiene,
Product Tech Center, Distribution Emergency Response

1. List any special concerns for this material while in transit?

None

Like: Anhydrous HCl - Extended time will result in excessive pressure.

2. Do you have a process to verify?

Correct unit number Yes ☒ No ☐ Not Apply ☐

Correct DOT vehicle specification Yes ☒ No ☐ Not Apply ☐

Container integrity Yes ☒ No ☐ Not Apply ☐

Analysis of heels Yes ☒ No ☐ Not Apply ☐

Final securement Yes ☒ No ☐ Not Apply ☐

Carrier has correct personal protective equipment Yes ☒ No ☐ Not Apply ☐
(PO tank trucks and PDC tank trucks only)

3. Are you satisfied with the safety, service, and emergency preparedness of the companies transporting your materials?

Yes ☒ No ☐ Not Apply ☐ for Rail

Yes ☒ No ☐ Not Apply ☐ for Truck

4. If "No", do you have a system to provide input to those evaluating carrier performance?

Yes ☐ No ☐

5. For truck transportation, is product specific driver training provided by Dow personnel?

Yes ☒ No ☐ Not Apply ☐ (For PO transporting only)

6. Has personal protective equipment required for loading this product been tested or approved by the Industrial Hygiene Department? Ref: 29 CFR 1910.133 - 134

Yes ☒ No ☐

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Hazardous Materials Transportation Review HMTR Questionnaires

7. List the methods used to assure that the container is not overloaded: Ref: 49 CFR 173.24, 173.314 and LPP 8.1.4

For Rail MGD, High Pressure trip, Flow meter on PDC only

For Truck Weigh Scales, Liquid vent trip, Loader check list

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Hazardous Materials Transportation Review
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Name of Material Propylene Oxide and Propylene Dichloride

OUTBOUND BULK QUESTIONNAIRE - continued

8. Is the vapor space prevented from passing through the flammable range during loading?
Ref: LPP 8.1.4

Yes ☒ No ☐ Not Apply ☐ for Rail

Yes ☒ No ☐ Not Apply ☐ for Truck

9. Are only Dow personnel involved in loading this product?

Yes ☐ No ☒ Not Apply ☐ for Rail (Dow trained contract loaders also)

Yes ☐ No ☒ Not Apply ☐ for Truck (Dow trained contract loaders also)

If "YES," go to Question 12

10. Have non-Dow personnel been trained in the proper handling of this material?

Yes ☒ No ☐ Not Apply ☐

11. How do you assure the non-Dow loader uses the proper protective equipment during the loading operation?

Training on Protective Equipment, Training verified by documentation.

12. What system do you have to verify that the driver or conductor has the required papers and

emergency response information? Ref: 49 CFR 172.600

Loading checklist, Emergency Response info on rail and tank truck bill of lading.

13. List any special concerns with loading this material.

PDC - Do not load on Aluminum Tank Cars or Trucks

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Hazardous Materials Transportation Review HMTR Questionnaires

Name of Material - DOES NOT APPLY

INBOUND BULK QUESTIONNAIRE

Resource - Product Prime Buyer (through division Purchasing), Distribution Regulations, Distribution Emergency Response, Industrial Hygiene

1. Do you have a "system" to report supplier defects to the purchasing department?

Yes [] No []

2. List any concerns you have for this material while in transit?

Like: Anhydrous HCl - Extended time will result in excessive pressure.

3. Has personal protective equipment required for unloading this product been tested or approved by the Industrial Hygiene Department? Ref: 29 CFR 1910.133 -134

Yes [] No []

4. Are only Dow personnel involved in unloading this product in your plant?

Yes [] No []

5. Has the non-Dow unloader been trained in proper unloading procedures in your plant?
Ref: 49 CFR 174.67 and 177.834

Yes [] No [] Not Apply []

6. Who documents the training? _____

7. How do you assure the non-Dow unloader uses the proper protective equipment during the unloading operation? (Like: cooling tower chemicals, compressed gases, and other raw materials.)

-
8. Is the material analyzed for positive identification before unloading begins?
Ref: Global Hazardous Materials Distribution Guidelines, Section 1.6

Yes [] No []

9. Is the vapor space prevented from passing through the flammable range during unloading?

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Ref: LPP 8.1.4

Yes [] No [] Not Apply []

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Hazardous Materials Transportation Review HMTR Questionnaires

Name of Material Propylene Oxide

MARINE QUESTIONNAIRE

Resource - Marine Technology Center (Freeport, TX), Marine Chartering (Houston, TX), Your local Marine Dept.

1. Are Dow personnel the only ones directly involved with the marine transfer (loading/unloading) operations for the material being shipped into or out of your facility?

Yes ☒ No ☐

2. If "No", how is training and/or licensing verified for the other people involved with the marine transfer? Ref: 46 CFR, Parts 10 and 12

-
3. Is the training documented?

Yes ☒ No ☐ Not Apply ☐

4. Have the facilities of the department performing the transfer been audited via the Marine Tech Center or the Terminal Tech Center?

Yes ☐ No ☒ Not Apply ☐

Date of last Review To be audited in 1997 by Distribution Technology Center

5. If "YES", attach a copy of the recommendations and response/action plans from the last Marine Tech Center or Terminal Tech Center audit.

Not Apply ☐

6. Does your Marine Emergency Response Plan comply with the Dow Marine E/R Guidelines. Ref: 33 CFR, Parts 150 and 154

Yes ☒ No ☐ Not Apply ☐

If "NO", what are your plans to achieve compliance? _____

7. Is your marine E/R plan periodically tested?

Yes ☒ No ☐ Not Apply ☐

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8. Is the testing of your marine E/R plan documented?

Yes ☒ No ☐ Not Apply ☐

9. Does the department responsible for loading check for the cleanliness and compatibility of the bulk container prior to loading?

Yes ☒ No ☐ Not Apply ☐ In addition to 3rd party inspection for such.

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Hazardous Materials Transportation Review HMTR Questionnaires

Name of Material Propylene Oxide

MARINE QUESTIONNAIRE - continued

10. If you load on heels are they analyzed "for last contained"?

Yes [☒] No [☐] Not Apply [☐]

11. How do you assure that reactive chemicals are not mixed during the loading/unloading process?

Pre Load Heel Samples, and Load Samples

12. List the methods used to assure that the vessel tank/container is not overloaded:

**Ships have High/High level alarms---Manual and Electric, and Loader checks
The Marine docks have pump kill switch**

13. Is the vapor space prevented from passing through the flammable range during loading/unloading? Ref: LPP 8.2.3

Yes [☒] No [☐] Not Apply [☐]

14. Has personal protective equipment required for loading/unloading this product been tested or approved by the Industrial Hygiene Department?

Yes [☒] No [☐] Not Apply [☐]

15. How are carrier personnel informed of the hazards of the material being transported?
Through ship posting of the Material Safety Data Sheet (MSDS)

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**Hazardous Materials Transportation Review
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Name of Material **DOES NOT APPLY**

WASTE QUESTIONNAIRE

Resource - Environmental Services, Environmental Operations

1. Has Environmental Services reviewed your material within the last 2 years to determine if all EPA regulations are being followed?

Yes ☐ No ☐ When? _____

2. What modes of transport are used to ship this material?

Package truck ☐ Bulk truck ☐ Vacuum truck ☐ Rail ☐ Other ☐

3. Does the equipment (including drums, tanks, vacuum trucks, and other containers) used to transport this material meet DOT specifications?

Yes ☐ No ☐ Not Apply ☐ Don't Know ☐

4. Are only Dow personnel involved in loading/unloading this material?

Yes ☐ No ☐

If "YES," go to Question 7.

5. Have non-Dow personnel been trained in the proper handling of this material?

Yes ☐ No ☐

6. How do you assure the non-Dow loader/unloader uses the proper protective equipment during the loading/unloading operations?

-
7. Do you have a process to verify?

Correct unit number	Yes ☐	No ☐	Not Apply ☐
Correct DOT vehicle specification	Yes ☐	No ☐	Not Apply ☐
Container integrity	Yes ☐	No ☐	Not Apply ☐
Analysis of heels	Yes ☐	No ☐	Not Apply ☐
Final securement	Yes ☐	No ☐	Not Apply ☐
Marking, labeling, and placarding	Yes ☐	No ☐	Not Apply ☐

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8. Is the vapor space prevented from passing through the flammable range? Ref: LPP 8.1.4

Yes [] No [] Not Apply []

Hazardous Materials Transportation Review
HMTR Questionnaires

Name of Material _____

WASTE QUESTIONNAIRE - continued

9. What process do you have to assure that container is not overloaded?
Ref: 49 CFR 173.24 and 173.314

10. What system do you have to verify that the driver, conductor, or tanker person has the required papers and emergency response information? Ref: 49 CFR 172.600

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