

DATE: August 7, 1992

FROM: Michael Bergstrom, Project Engineer

TO: E.M. Hawthorne
R.A. Ott
J.J. Niklas

SUBJECT: VARIANCE FROM SAFETY ORDER S-144, FIRE RETARDANT CLOTHING

Present Situation

The contract work on V-BD-990, Site III, was awarded, and the first two phases of work are started. The total scope of contract work includes:

- scaffolding the sphere
- enclosing the sphere/scaffolding with plastic
- removing the mastic coating which contains asbestos
- removing the foam glass insulation
- sandblasting the red lead paint primer
- repainting the sphere with rollers
- reinsulating the sphere

The area around the sphere is considered an FRC required area. The sphere is empty and isolated from all other process. Appropriate personnel and equipment access over the concrete firewalls is nearing completion.

The asbestos disposal dumpsters are located on the west side of the sphere, and the decontamination trailer is located on the southwest corner of the diked area.

DPMC Policy

The existing DPMC policy states the requirements for FRC use. These requirements include:

- long sleeve FRC must be worn by all personnel while in field locations, including operating unit areas, tank farms, hydrocarbon loading/unloading areas, motor control centers, laboratory areas, hydrocarbon handling areas, etc.
- FRC is worn for initial opening of all process equipment, by vacuum truck operators, and in enclosed areas when flammable dust is generated.

Proposed Variances from DPMC Policy

We are requesting that the area identified in the attached drawing be temporarily classified as a non-FRC area.

We want to be able to do the remaining work without wearing FRC clothing. The remaining work includes the last 5 phases of the

DPMC-16027

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project list above.

The insulation removal portion of the work is routinely exempted from FRC requirements throughout the Complex because we are unable to find a laundry that can handle asbestos contaminated clothing. Additionally, the insulation removal workers wear "cool suits" to reduce the added heat stress factor of working inside the plastic enclosure. The other phases of the project will also be conducted under the plastic enclosure with the same heat stress complications.

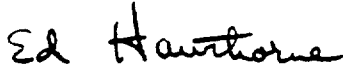
Safeguarding for the Variance

The sphere is empty and blinded. We will use a firewatch to patrol the north, west, and south sides of the plot. The firewatch can quickly identify any leaks/releases that can present a danger to the workers inside the plastic enclosure, and sound an evacuation alarm to the workers inside the enclosure.

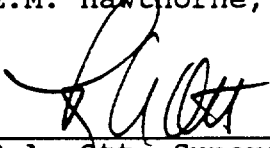
This variance has been discussed with the appropriate area H&S inspector, supervisor, and group leader. Please sign below giving permission to classify the worksite as a non-FRC required area.

Michael Bergstrom

APPROVALS:



E.M. Hawthorne, Manager H&S

 8/10/92

R.A. Ott, Superintendent, Solvents & Distribution

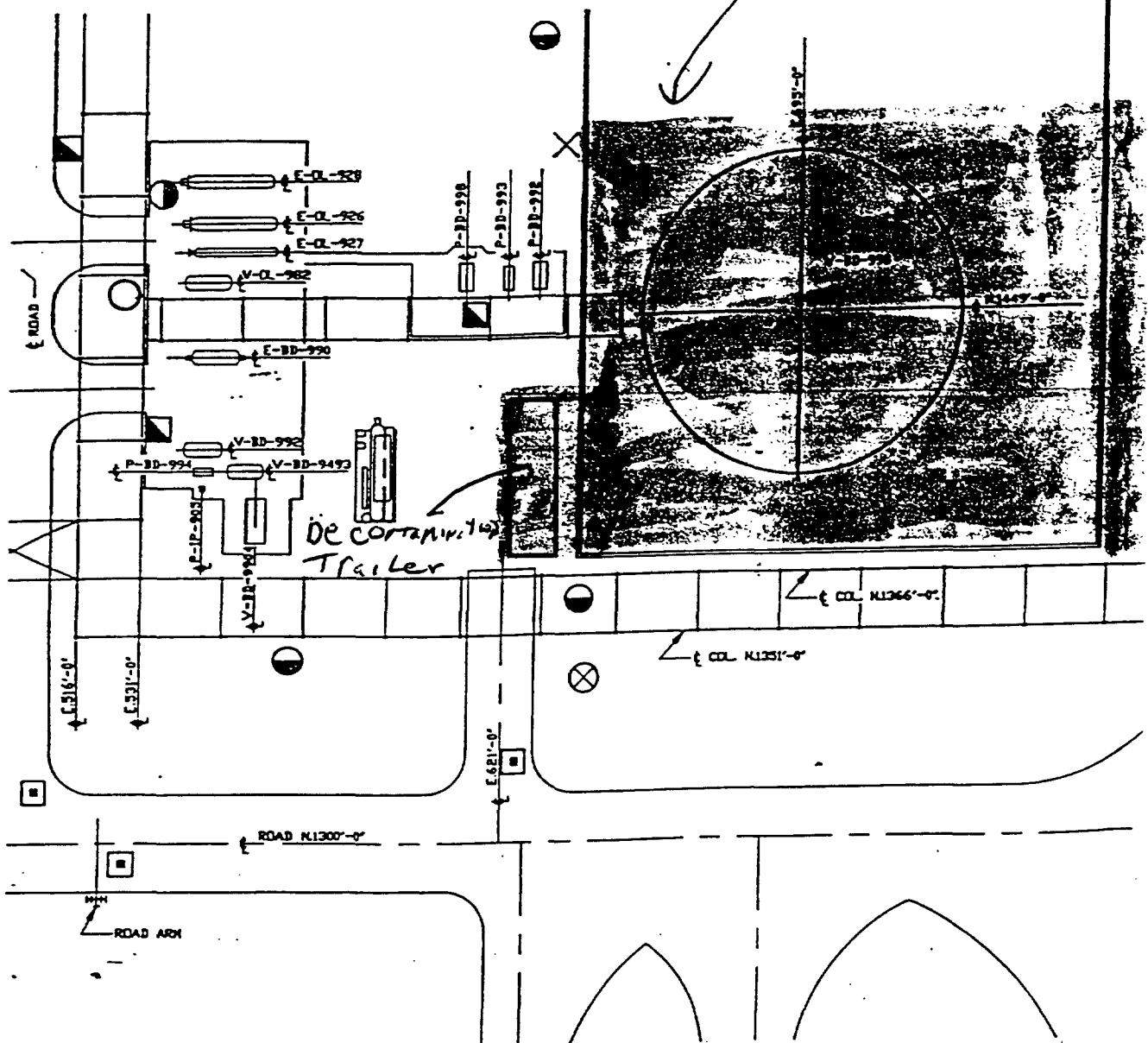


J.J. Niklas, Technical Manager

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DPMC-16028

This NON F
WILL be



REFERENCE DRAWINGS

E-71378	SHEET 1 OF 7	EMERGENCY EQUIPMENT - SITE III
E-71379	SHEET 2 OF 7	EMERGENCY EQUIPMENT - SITE III
E-71380	SHEET 3 OF 7	EMERGENCY EQUIPMENT - SITE III
E-71382	SHEET 5 OF 7	EMERGENCY EQUIPMENT - SITE III
E-71383	SHEET 6 OF 7	EMERGENCY EQUIPMENT - SITE III
E-71384	SHEET 7 OF 7	EMERGENCY EQUIPMENT - SITE III

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NO.	DATE	JOB

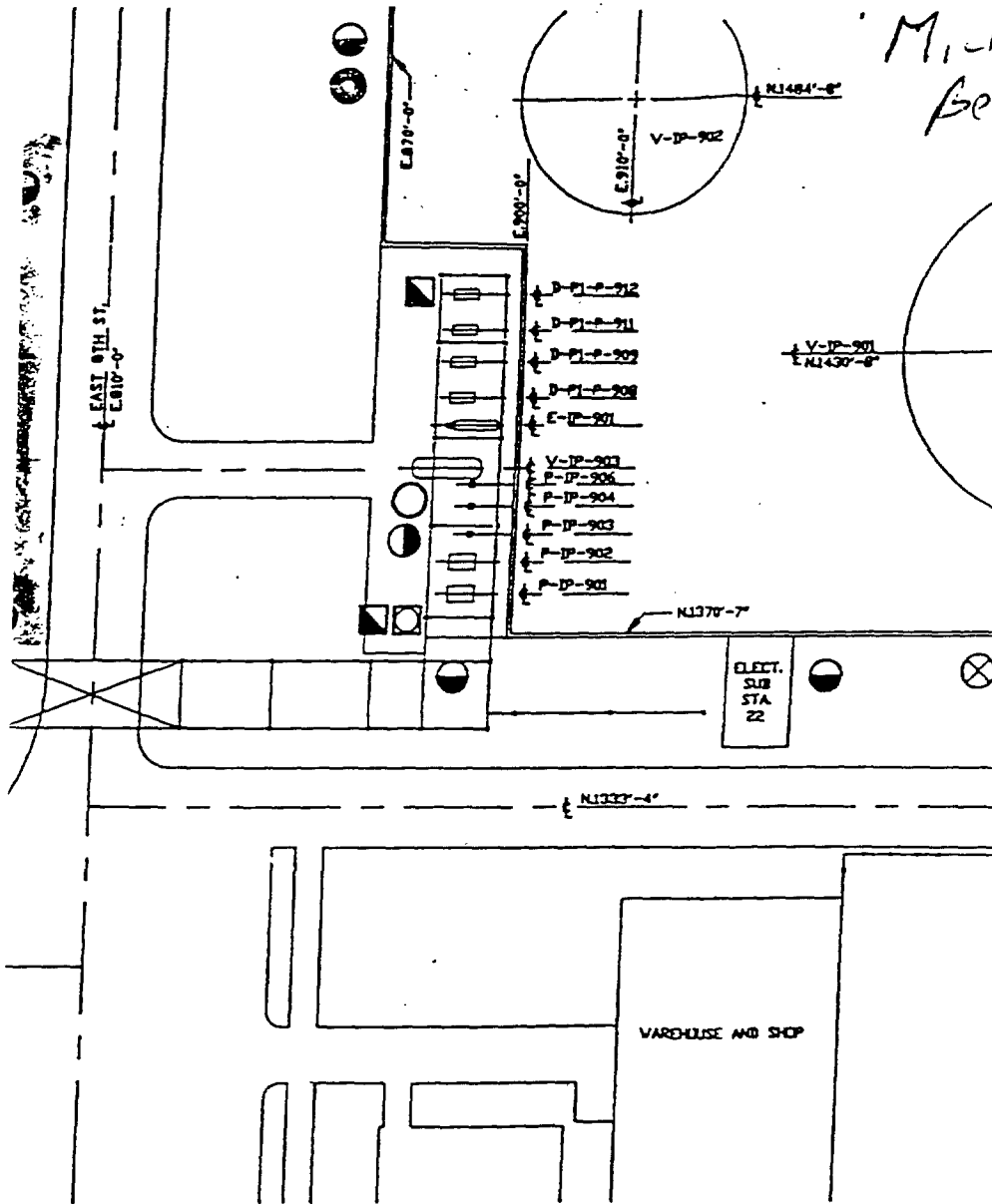
C Area
identified

FRC Variance Drawing For Site 3 Sphere V-BD-990 Reinsulation

Michael

Begstrom

8/7/92



LEGEND

- SAFETY SHOWERS
- SVAM STATIONS
- FIRE MONITORS
- HOSE REELS
- FIRE MANIFOLDS
- DELUGE SYSTEM
- FIRE EXTINGUISHER
- SCOTT AIR PACK
- SIGNS
- FIRE BLANKET
- STEAM LANCE

LAM 000315

DRAWING CODE: 1270.098.210.485



DEER PARK MANUFACTURING COMPLEX
SHELL OIL COMPANY - SHELL CHEMICAL COMPANY

SHEET 4 OF 7
EMERGENCY EQUIPMENT - SITE III
'E' DEPARTMENT

DATE	7-31-92
BY	JIC
CHECKED	JIC
APPROVED	JIC

DATE	7-31-92
BY	JIC
CHECKED	JIC
APPROVED	JIC

DATE 7-30-91 LOC C
E-71381-00

DEPM-16030

OPERATIONS
Shutdown Reports
Variances
130320
1992 21.6

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DPNIC 16026.1