



INTER-OFFICE CORRESPONDENCE

Date: November 9, 1982
From: Fritz B. Emmerling
Location: General Office - One East

Subject: Hazardous Material Audit -- Lake Charles

To: G. C. Strickler

*Serial out inspecting
pre-leads before leaving*

A hazardous material audit was conducted on October 20-22, 1982. Mr. Don Pinkston assisted. The overall evaluation of Lake Charles' practices regarding hazardous material shipments was favorable. The following items were noted:

*Shipping
L2 Flour*

1. Release of pre-loaded cargo tanks should be examined to ensure proper certification of each shipment. B/L No. 855750-4, dated 10/20/82, covered a trichloroethylene shipment picked up by Matlack on the 12-8 shift, 10/21/82. The shipment was not properly certified by PPG. A gate guard initialed the B/L in the "signature" column. A procedure should be established to ensure certification. 49CFR 172.204(d)(1) requires that the certification "must be legibly signed by a principal, officer, partner, or employee of the shipper or his agent . . .".

Bertrice

2. Transportation of hazardous material on public roads must be accompanied by proper shipping papers. The movement of chlorine ton tanks to Thompson-Hayward is currently made without a shipping paper. The Traffic Department is taking steps to correct this. Please advise regarding procedure adopted.

The marking of ton tanks to highlight tank numbers and test dates is commended. This practice shows that tanks are being checked and makes identification of these markings easier.

Shipping

3. For tank car shipment of chlorides, a procedure should be established to seal the dome of the car with a single, new transportation safety data tag. Several cars had two or three tags, none of which were necessarily new. Transportation safety data tags should be replaced for each tank car shipment.

*new tags
every trip
Remove old ones
Shipping
Done*

4. Tank cars used for shipment of vinyl chloride must be stencilled on the dome with statements showing extreme flammability and that VCM is a cancer suspect agent. This is not a DOT requirement but is an OSHA requirement. Car No. UTLX 92423 required stencilling and arrangements were made to do so.

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NOV 12 REC'D

5. Cargo tanks used for shipment of ethyl chloride should be checked for marking and placarding. Truck No. PP9025, a Matlack trailer, had a faded stencil of the product name and a sun faded placard on the rear of the trailer. 49CFR 172.516(c)(6) requires that placards "be maintained . . . in a condition so that the format, legibility, color, and visibility of the placard will not be substantially reduced due to damage, deterioration, or obscurement by dirt or other matter." It is recommended that pressure-sensitive vinyl placards be used instead of paper placards for this service. The product name should be re-stencilled.

Shipping
Stencilling Done.

6. Car No. UTLX 83454, an empty ethyl chloride tank car, had a bent placard holder on the left side of the car and was not placarded. The placard holder was immediately repaired. 49CFR 172.510(c) requires that "each empty tank car must be placarded with an EMPTY placard as required and described in 172.525 or paragraph (a) of this section."

Shipping
Done (2/21/81)

7. Car No. ACFX 89392, containing trichloroethylene, had an improper test marking and a dirty placard. The dirty placard should be replaced for the reason listed in item 5. Test dates should be checked and restencilled to show specific dates for the tank and the safety valve.

check Test
date per

8. PELS® hopper cars are marked inconsistently with regard to ship name. Car nos. PPGX 12935 and 12936 show no ship name. PPGX 12923 has the ship name "caustic soda". PPG policy is to show the ship name on all rail cars used in dedicated service. Similarly, for liquid caustic soda shipments, two cars should be checked for marking of proper ship name. PPGX 7358 shows the incomplete name "caustic" and PPGX 3225 has a poor stencil which should be replaced.

Fuller

9. Barges in the harbor and dock area were observed with respect to warning signs, cargo information cards and placards (which are not required by DOT). The placards and cargo information cards on barge CSCC200 (ethylene dichloride) were in poor condition. Barge No. 223 and 244 for caustic soda had no information cards. Caustic barges in the harbor had no placard holders on the ends of the barges and several placards were missing or in poor condition. Placards, if used, should be in good condition. Information cards are required and should also be in good condition.

Shipping

A chlorine barge was noted to have a warning sign which was painted in red. The barge number was not visible, but a similar item was noted in the 1981 audit. Warning signs should be in black.

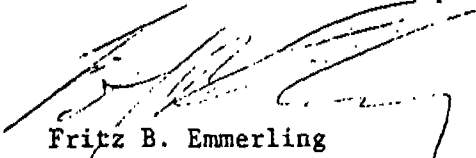
- Peard*
10. Drums used to contain waste material must meet packaging specification requirements for the material and hazard class involved. The drums used are marked DOT 17E/17H. These drums do not meet this specification because they do not have a nut on the bolt used on the closing ring. 49CFR 178.118-8(b) requires that "drums . . . must be closed by means of twelve gauge bolted ring with drop forged lugs, one of which is threaded and having . . . 5/8" bolt and nut for drums over 30 gallons capacity." Purchasing should contact the drum supplier to correct.

No errors were found on waste manifests but a separate memo will be sent to Environmental Control on non-routine waste descriptions to be reviewed for correction.

- Beatrice*
11. On return B/L's, identification numbers should not be used to describe materials which are not shipped as hazardous. Return B/L's for perchloroethylene and trichloroethane should not include identification numbers.

The packaging of samples for UPS and air shipments were found to be handled in an exemplary manner. No errors were noted.

It was a pleasure to again visit the Lake Charles plant. I appreciate the support and assistance received throughout the audit. A response is requested in approximately 30 days showing action taken regarding the discrepancies noted.


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FBE:mf

cc: C. W. Banks
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