



TO Fritz B. Emmerling, 1E DATE December 7, 1982

FROM Gerry K. Jordan SUBJECT The 1982 Hazardous Material
Audit - Lake Charles

Lake Charles Management appreciates that you conducted a thorough hazardous material audit for us. We are pleased that you were favorably impressed with the way we handle these materials; especially in today's climate of close scrutiny in which industry operates.

Following are responses to each of the eleven items noted:

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 . . .".
 - The Bill of Lading was initialed by a gate guard rather than signed. This involved a pre-loaded trailer so the Bill was not available to the loaders when they loaded the trailer. Standard procedure is for shipping department personnel to properly certify the shipment by signing the Bill when a pre-load is to be shipped. We will reinforce the practice of inspecting pre-loads and properly handling Bills Of Lading prior to shipment.
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.
 - We had been using a delivery receipt for the movement of ton containers to Thompson-Hayward since they were located within the plant boundaries. This practice was continued when Thompson-Hayward moved "outside the gate". The form has now been revised to properly describe the product and the certification has been added. A copy is attached.

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.
 - The procedure has been established to replace old transportation safety data tags with new ones each trip.
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.
 - This stenciling requirement is part of the pre-loading check procedure, but it was evidently missed on this car. Stencil has been applied.
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.
 - Product name has been re-stencilled and pressure sensitive vinyl placards applied as recommended.
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."
 - Placard holder was repaired when discovered during inspection. The car was empty in our yard at the time. When a car is loaded, the tankermen install new placards. The condition would have been detected and corrected before the car left the plant.

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.
 - Tank car ACFX 89392 is a car leased by Detrex from American Car and Foundry. The placard has been replaced. We have notified Detrex that the stenciling is incorrect.
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.
 - The three PELS[®] cars, PPGX 12935, 12936, and 12923, will be properly marked to show "Caustic Soda Beads" as per PPG Paint Specification #705. We will inspect other PELS[®] cars for compliance as they return to the plant. The stencil on PPGX 3225 has been replaced as recommended. We have no car numbered PPGX 7358 in our service.
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.

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.

 - EDC barge CSCC200 was spotted to receive EDC being off loaded from a ship to shore tanks in case the ship cargo exceeded the capacity of the storage tanks. No product was actually placed in the barge. Caustic Barges 223 and 244 were loaded for storage purposes also. When we receive an order and a "storage" barge is to be shipped, it is re-inspected and fresh information cards and/or placards are supplied if necessary.

The placard holders were to be removed from caustic barges when they go through a shipyard for inspection or repairs. Some have been missed. These will be removed as the barges are loaded. The warning signs are being repainted as the barge goes to the shipyard for repairs. The chlorine barge observed during the audit is scheduled for early 1983.

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.

- The regulation is clear on the subject. Our Purchasing Department has instructed our drum suppliers to supply the nut on all drums delivered in the future. Our Environmental Department and affected operating units have been notified of the required nut. Drums already in the plant will be properly closed before they are shipped from the plant.

The jam nut is clearly a redundant feature of the package, therefore, follow-up will be a must to assure ourselves that our people continue to follow the regulations.

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.

- We have eliminated the use of UN numbers on return bills of lading for Perchlor and Trichlorethane.

GKJ/cp

Attachment

CC: G.C. Strickler
H.C. Hank
A.J. Beatrice
J.C. Lafleur

SL 089813

PPG INDUSTRIES, INC.

INDUSTRIAL CHEMICAL DIVISION

P. O. BOX 1000

LAKE CHARLES, LOUISIANA 70601

CUST. ORDER NO.	SHIP REQ'D. 10-28-82	DELIVERY RECEIPT	OUR ORDER NO.
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CUSTOMER Thompson HaywardADDRESS: Lake Charles La.

Chlorine-Non Flamable Gas-UN 1017 RQ
Poison (Ton Tank)
(Chlorine Labels Applied)

	NO. OF PKGS.	NET WT. PER PKG.	TYPE OF CONT.	COMMODITY	GROSS WEIGHT
	12	2000	TON CY!	Liq. CL ₂	
				878	2962
				19	477
				2326	2926
				827	534
				904	654
				1173	997

RECEIVED AT LAKE CHARLES, LA., THE ABOVE MATERIAL IN GOOD ORDER AND CONDITION.

CUSTOMER NAME: Thompson HaywardPER: _____ DATE: 10-28-82LICENSE NO. ML STATE _____

This is to certify that the above articles are properly
classified, described, packaged, marked and labeled and
are in proper condition for transportation, according to
the applicable regulations of the Department of Trans-
portation.

GATE PASS

(PPG) SIGNATURE

R Barnes

TRAFFIC DEPARTMENT

R Barnes

1. FOR TRAFFIC 2. DELIVERY RECEIPT (FOR TRUCK DRIVER) 3. GATE PASS 4. TRAFFIC

SL 089814