

4. Prilling and prilled product is a major and serious source of direct operator contact with dusty and solid product. Prilling tower regarded as operationally inadequate because it requires excessive manual cleaning resulting in contamination. Prill bagging, prill bulk loading, and routine cleaning of these systems are other major sources of operator contact and area contamination. Penta block pouring system is a major source of fumes, especially the 2000# blocks which must be re-heated with torch for mold removal.
5. Prilled Pentachlorophenol is shipped in non-dedicated railroad hopper cars and hopper trucks. This practice can result in cross-contamination with other materials including grains and food grade products.
6. Mid-America Warehouse operations as a contractor for bulk loading of Penta prills from bags and drums is a potential source of personnel hazards and environmental contamination and could be a very serious source of liability and very adverse company publicity.
7. The use of water cooling and steam heating in the process can result in accelerated corrosion when water and/or steam leaks into the process. In addition to equipment damage, potential exists for serious spillage of process materials and the attendant exposure to personnel and waste stream contamination.
8. Extensive and obvious corrosion to equipment, piping, storage and structure is a source of potential failure leading to personnel injury or exposure, property damage, production loss and environmental contamination.
9. Spills, leaks, and scrubber waste streams result in excessive loadings to the sewer. Present phenol-loading values are biased low because method does not accurately measure chlorophenols to sewer and treating plant.
10. A recent major chlorophenol spill highlights the complexity of decision making to implement the emergency notification procedure.
11. Alkali insoluble residues high in octachlorodioxins and hexachlorodioxins and other suspect toxic materials are periodically sewered.
12. Heavy ground area contamination with raw materials, intermediates, and products results in foot-wear contamination of surroundings and air contamination from volatiles. In the opinion of the audit committee, existing work practices relating to housekeeping, maintenance, protective clothing and equipment, and personal hygiene in the chlorophenol facility are not adequate in preventing inhalation and repeated skin contact with chlorophenol vapors and/or dust.