



INTERNAL CORRESPONDENCE

SILICONES & URETHANE INTERMEDIATES

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To (Name) Mr. R. N. Bates
Division Mr. J. L. Worstell
Location
Copy to Mr. T. E. Lawrence

Date November 10, 1981
Originating Dept. Environmental Protection
Subject Vinyl Chloride Releases

Gentlemen:

The additional provisions that have been taken to contain and prevent the release of vinyl chloride to the atmosphere appear to be appropriate considering the relatively short time which the unit will operate this year, and possibly for 2-3 months next year. Everybody recognizes the provisions only "buys-some-time" for the operators to react and be able to shut the system down or take other corrective actions to prevent the safety valves from discharging. Obviously, significant expenditures cannot be justified if the system is to be permanently shut down in the near future.

As I mentioned in my previous correspondence, if a decision is made next year to continue the operation of the system beyond 1982 then consideration should be given to installing a safety valve collection header system. Meanwhile, every effort should be made to insure the recently installed alarm systems are routinely inspected and maintained, and that the operators, etc. are fully trained in the operating procedures to prevent safety valve discharges resulting from emergency situations. The additional "operator-reaction" time that is gained with the additional alarms, etc. will not help much if the operators and staff don't react correctly and in the minimum time. Perhaps the Foremen and Technical Staff need to play the "What-If" game with the operators. Also, I believe it is imperative that all the alarms and control devices are thoroughly inspected, checked, etc. immediately prior to start-up after the system has been shut down for an extended period.

I suspect you guys have already thought about all these items and have taken appropriate action. I know all three of us are concerned about future releases, and the potential consequences. Perhaps continued, frequent expression of our concerns to the operating staff would help remind them of the need to place a little extra effort to prevent future releases.

RECEIVED
NOV 11 1981

Very truly yours,

R. L. Foster

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J. L. WORSTELL

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