

INTEROFFICE MEMORANDUM

Date: 16-Feb-1996 02:08pm EDT
From: JOHNSONS
JOHNSONS@HNY@MRGATE@CLE
Dept:
Tel No:

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Subject: NARRATIVE - VINYL CHLORIDE LEAK FROM SEPARATOR DRAIN LINE

The Geon Company
Henry, Illinois
Vinyl Chloride Leak
Board Of Inquiry

Summary and Cause of Incident

On 2/5/96 at 16:00 hours a fugitive emission of vinyl chloride occurred from a faulty coupling in the 23J separator drain line (frozen).

Board of Review:

A Board of Review to gather facts surrounding the incident was held on 2/5/96 at 18:30 hours in the Bldg 771 conference room. This incident is regulated by the leak detection and repair section of NESHAPS, it does not constitute a violation. A review was undertaken to determine actions to be taken to reduce the likelihood of reoccurrence for leaks of this type. This is in accordance with GEON'S emission reduction policies. The following were in attendance:

Juan Canella - Plant Manager
Ron Moore - Dryer Technical Supervisor
Jim Ziegelmeyer - Poly Technical Supervisor
Ken Prather - Dispersion Process Engineer
Steve Dalton - Manager of HS&E/HR
Scott Johnson - Environmental Engineer
Vince Stalsis - Poly Operations Supervisor - A shift
- Recovery Operator - A Shift

A follow-up Board of Review was held to review new facts surrounding the incident on 2/8/96 at 09:00 hours in the Bldg 771 conference room. The following were in attendance:

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an Canella - Plant Manager
 Terry Castor - Utilities/Maintenance Manager
 Ron Moore - Dryer Technical Supervisor
 Jim Ziegelmeyer - Poly Technical Supervisor
 Rob Calder - Safety Engineer
 Steve Dalton - Manager of HS&E/HR
 Scott Johnson - Environmental Engineer
 Vince Stalsis - Poly Operations Supervisor - A shift
 's - Recovery Operator - A Shift
 Jim Whiteaker - Instrument Technician

Recommended Actions for Leak Reductions:

1. Investigate the remaining fittings/lines from the separator. - Ron Moore - Complete. 23J separator had 7 victaulic couplings which were all replaced.
2. Replace all victaulic couplings that are in VCM service. - Ron Moore - A solid line with flanges is being fabricated for 23J separator and will be installed on 2/9/96. Replacing victaulic couplings with flanges can reduce the likelihood of future leaks, thus reducing plant emissions.
3. Check the integrity of all VCM related equipment in service, section by section. - Terry Castor - Terry has contacted Bob Jordan. Bob will be at the Henry Plant on 2/19/96. In addition, Steve Smith has contacted CONAM, a company that can also do integrity checks. Terry will determine the persons to do the work and the time table for completion.
4. Complete a process hazard analysis of the separator system. - Rob Calder - Bob will schedule for 2/23/96.
5. Check the GC sample line integrity at the tank farm and poly building. - Terry Castor - Complete. Some tubing fittings on the tank farm GC were leaking. Terry will investigate new types of fittings. Additionally, carryover within the Poly Building GC was found. This is due to the short sampling period and number of points sampled.
6. Repair Poly building ventilation inlet ductwork. - Rob Calder - Complete.
7. Inspect the heat tracing system on 23J separator drain line and repair as needed. - Terry Castor - Complete.

Narrative:

On 2/5/96 at 16:00 hours, (Recovery Operator) called Vince Stalsis (Poly Operations Supervisor) to notify him that the VCM alarm at the tank farm had sounded. Vince secured an OVA and proceeded to the tank farm. He checked the VCM car unloading area, catwalk area for car unloading, VCM pump area, and walked the fence line without obtaining any reading on the OVA. He continued to monitor as he walked back to the Poly Building. When he reached the column annex, the OVA starting rising to 100 ppm. When Vince looked toward the feed tank area, he observed water coming from the 23J drain line. The drain line was immediately isolated. Following that, Vince and removed the insulation from the drain line and found the victaulic coupling

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asket had deteriorated, causing the fugitive emission.

Facts Surrounding the Incident:

1. The 23J separator drain line to #1 Feed Tank was frozen.
2. The weather conditions prior to the incident were severely cold.
3. Both feed tanks were in service.
4. The feed tanks were cleaned on Saturday 2/3/96 during the product changeover.
5. The first VCM alarm at the tank farm occurred at 16:02 hours on 2/5/96.
6. The tank farm readings continued to rise to 135 ppm.
7. The building monitor readings in the Poly Building showed 138 ppm.
8. Leaks were found in the GC sampling tube couplings leading to false readings at the tank farm.
9. Carryover within the Poly Building GC resulted in false readings in the Poly Building, therefore resulting in an overestimation of the duration of the vinyl chloride emission.

Management Systems Investigations:

1. All appropriate agencies were notified in a timely fashion.
2. No one was exposed to high levels of VCM.
3. All the proper procedures were followed.

Conclusion:

The 23J separator drain line froze resulting in a fugitive emission of vinyl chloride from a faulty coupling.

Distribution:

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HENK?

I N T E R O F F I C E M E M O R A N D U M

Date: 15-Mar-1996 04:24pm EDT
From: JOHNSONS
JOHNSONS@HNY@MRGATE@CLE
Dept:
Tel No:

Use RDL option to see message distribution.

Subject: NARRATIVE - VINYL CHLORIDE LEAK FROM SEPARATOR DRAIN LINE

PLEASE NOTE: this narrative is being reissued to stress that victaulic couplings should not be in use on vinyl chloride service equipment.

The Geon Company
Henry, Illinois
Vinyl Chloride Leak
Board Of Inquiry

Summary and Cause of Incident

On 2/5/96 at 16:00 hours a fugitive emission of vinyl chloride occurred from a faulty coupling in the 23J separator drain line (frozen). Victaulic couplings are not approved for vinyl service per engineering standard T-500 15.70.05. The victaulic couplings were not recognized as posing a risk.

Board of Review:

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REDACTED

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