

To: J. D. Olson

From: D. E. Knittig
Date: November 7, 1990

Interoffice
Communication

Subject: DOT UNLOADING REGULATIONS COMPLIANCE PROJECT

VISTA

Attached is the review issue of the Class "A" design to implement DOT Regulation requirements at the VCM unloading area. This project addresses the DOT Unloading Requirements by providing "attended" immediate shutoff of the process and railcar in the event of an unloading malfunction. The project will;

- 1) Add two additional VCM lower explosion limit monitors.
- 2) Add emergency shutoff valves on all the railcars.
- 3) Add emergency shutoff or ball check valves to isolate the process.
- 4) Change the monitoring of VCM in the area by placing two of the fixed point monitors on a different gas chromatograph.

These additions address the plant's need, based on DOT regulations, to attend the railcar through non-human monitoring during unloading and provides for immediate shutoff. The requirements for non-human monitoring are;

- 1) equipment used must provide surveillance capability at least equal to that of a human observer on-site or at a remote location;
- 2) equipment used should be designed to provide immediate notification of malfunction to a person responsible for unloading, but if not so designed, equipment must be checked at least once every hour for proper functioning;
- 3) in the event of known equipment malfunction, human observation of the unloading, as described above, must be instituted immediately; and
- 4) the person responsible for unloading must have the capability to halt the flow of product immediately.

This project will be included in the 2nd FQ91 capital budget. A review meeting is scheduled November 16, 1990, at 9:00 am in the main conference room.

Doug Knittig
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Process Engineer

cc:RWS, DCS, DFJ, JMV, LDH, DAMi, JBA, REP, RBN, SCH, BLT, RHS, 7.22.0