

SUBPART V COMPLIANCE PROJECT TRAININGA. Regulation

1. Open-ended valves or lines - definition.

Any valve except relief valves having one side in contact with the process fluid (VCM) and the other side open to atmosphere either directly or through piping. E. G.- an unplugged valve.

2. Standards for open-ended valves or lines.

1. Every open-ended valve or line must be capped, blind flanged, plugged or have a second valve.
2. The cap, blind flange, plug or second valve must seal the open-end at all times except during operations that require flow through the open-ended valve or line.
3. Each open-ended valve or line equipped with a second valve must be operated such that the process side valve closes before the second valve.
4. For double block and bleed arrangements. The bleed valve(s) may remain open only during operations that require venting. At all other times they must be sealed.

B. New Installations/Procedures for Subpart V Compliance

1. Atmospheric Vent Valves

- a. A second valve was installed on all reactor atmospheric vents.
- b. Each new valve has position switches and control room position indication.
- c. Existing pushbuttons control both these new valves and the old valves.
- d. Existing interlocks apply to both valves.

2. Catalyst and BME Valves

- a. A second (block type) valve was installed on all the catalyst charge/normal kill lines for all reactors and the BME charge lines of D-700 and D-745.
- b. Limit switches are installed on each new valve with both field and panel indication of the valves position.

SUBPART V COMPLIANCE PROJECT TRAININGB. New Installations/Procedures for Subpart V Compliance

2. Catalyst and BME Valves (continued)

- c. Control of the existing and the new valve is by a single switch located at the reactor.
- d. The panel mounted emergency close button includes both the new and the existing valve.
- e. New panel mounted emergency close buttons were installed for D-700 and D-745 catalyst and BME valves. Two buttons on each reactor.

3. Incinerator

- a. An additional block valve was installed on each inert feed line.
- b. An additional bleed valve was installed on each inert feed line bleed valve at the incinerators liquid seal flame arrestor.
- c. The block valves will close then the bleed valves open when the incinerator goes to low fire.
- d. The bleed valve will close then block valves open when the incinerator goes to high fire.
- e. A pressure switch has been installed in the inert feed line. It is set at 40 psig to close the recovered VCM receiver remote operated valve when inert feed pressures to the incinerator exceed 40 psig.