

INTER-OFFICE CORRESPONDENCE

DATE: February 3, 1992
TO: R. G. Corley FROM: K. M. Daye
LOCATION: General Office - 35W
SUBJECT: Closed Dome Loading

Attached for your review is a copy of the proposed letter to be forwarded to chlorinated solvent customers relative to the closed dome loading procedure that we plan to implement effective March 16. Prior to issuance of this letter to our customers, I am requesting your thorough review of this system from a safety perspective. Following your review, please indicate your approval or disapproval of the proposed procedure. As the implementation date is rapidly approaching, I would request that you give this your prompt attention. As we discussed, Francisco Ortiz and Gerry Jordan would be good contacts for detailed discussions on this issue.

K. M. Daye

cc: G. Jordan
F. Ortiz

SL 091682



PPG Industries, Inc One PPG Place Pittsburgh, Pennsylvania 15272

CUSTOMER NAME
ADDRESS

RE: Closed Dome Loading for Chlorinated Solvent Trailers at
PPG Industries' Lake Charles, Louisiana Plant.

Dear XXXXXXXX:

As part of PPG's ongoing efforts to ensure that our chemicals facilities are operated in an environmentally sound fashion, our Lake Charles, Louisiana plant is working to significantly reduce emissions of organic vapors by implementing closed dome loading procedures on all bulk trailer shipments of chlorinated solvents. Closed dome loading will require some changes in how we load solvent trailers, will affect the types of trailers that may be utilized, and will also affect the condition of the trailer when unloading. As it is essential that your people fully understand the changes that will occur as a result of the implementation of a closed dome loading system, we ask that you forward this information to the appropriate employees within your organization.

Under the closed dome loading procedure, our vapor recovery system for tank trailer loading will vent directly into our plant incinerator. The system operates at a backpressure of 6-10 psig, consequently trailers will be under a positive pressure while loading. Once the system becomes fully operational, any trailer to be loaded will have to be "airtight" prior to loading and capable of holding a pressure of 10 psig while loading and in transit.

Our planned start-up date for closed dome loading is March 16, 1992. Effective March 16, we will only load trailers capable of holding positive pressures. This will limit the type of tank trailer we load and will require a change in the handling of the trailer during unloading.

Our minimum trailer requirement would be specification MC307 and MC312 trailers, or trailers meeting these design and construction requirements, equipped with a 25 psig or greater safety relief valve and a fusible cap for each compartment. The internal and external valve seats should be Teflon®, and leaktight. The dome gaskets should be Viton®, Hypalon®, or Teflon®. If Teflon® is used, it should not be oil impregnated and must be clean on the surface with no fibrous strands.

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Prior to loading, all tank trailers will be pressure tested above 10 psig and checked for leaks. If the trailer leaks, it will have to be repaired before loading. If the trailer passes the leak test, it will be purged with nitrogen to reduce the oxygen level for safe venting to the incinerator, and then loaded.

Solvent trailers leaving our plant will have a 10 psig or greater pressure in the tank. Extreme caution must be used when preparing the trailer for unloading to prevent personal injury. Unloading personnel must be aware of the internal pressure in the trailer. *The manway must be opened slowly to allow any internal pressure to bleed off. To reinforce this message, all trailers will be tagged with a warning about the possibility of internal pressure being present.

The closed dome loading system is an important part of our ongoing effort to reduce organic vapor emissions. If you have any questions about the system or the affects that the system will have upon tank trailer loading and unloading requirements, please contact your local PPG sales representative.

Very truly yours,

XXXXXX Area Sales Manager

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