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TO	M. L. Pulley	FIELD POINT OR DEPT. & BLDG. NO.	DATE YOUR LETTER
FROM	B. E. McWhirter	Deer Park	DATE THIS LETTER 2/26/85
SUBJECT	INQUIRY REVIEW - DEER PARK CHEMICAL PLANT TOXIC CHEMICAL RELEASE ON 1/31/85 REPETITIVE ACCIDENT TYPE 10-A		

File

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Summary of Incident

On January 31, 1985, at 0410, the relief valve on the 520 slurry stripping column relieved for 20 seconds releasing 103 lbs. of VCM to the atmosphere. No personnel were injured or exposed to VCM.

Board of Review

A meeting was held at 0730 on January 31, 1985, to discuss the incident. In attendance were:

W. C. Fultz - Plant Manager
 R. B. Kitchen - Plant Engineer
 B. E. McWhirter - Resins General Foreman
 J. L. Miller - Senior Safety Engineer
 E. L. Dillow - Maintenance Coordinator
 W. R. Sullivan - Shift Foreman
 - Resins Operator

Narrative

At approximately 0400 on January 31, 1985, the operator charged with operation of the 520 column noticed the column pressure was indicating the column was operating at a vacuum rather than the normal 17 psia while the column feed recorder indicated flow to the column. Resins Operator, went to the field to investigate. During his investigation, he found the 520 economizer rupture disc blown, and immediately after this he saw the column relief valve lift. He immediately went back to the control room and manually opened the column overhead pressure control valve via the control panel instrument. The relief valve reseated and he proceeded to shut down the column by shutting off the steam and slurry feeds. The relief valve lifted for about 20 seconds. No one was exposed to VCM vapors during the incident.

Facts Surrounding the Incident

1. There is no low pressure alarm on the stripping column.
2. There is no high temperature alarm on the column.
3. After the incident, it was determined that the column overhead pressure transmitter had incurred an electronic component failure.

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4. The column high pressure alarm receives its indication from the transmitter.

Management Systems Investigation

1. All operators in the plant during the incident are experienced in the department with 5 to 15 years experience and all are trained in column operation.
2. has been a Resins Operator for 5 years and is trained in column operation. He responded quickly to the situation and minimized the size of the release.
3. Column readings are recorded in log sheets every two hours. All 0300 column parameters looked normal.
4. No procedures were violated and no improper work practice was involved in the incident.

Conclusion

1. Electronic component failure in the column pressure transmitter gave the pressure controller an indication of low column pressure which in turn resulted in the controller closing the overhead pressure control valve. The closed control valve and continued feed to the column resulted in high column pressure and subsequent lifting of the relief valve.
2. Since the column high pressure alarm receives its signal from the failed transmitter, no high pressure alarm was received.

Corrective Action

1. Separate the pressure alarm to ensure the operation of the column high pressure alarm if the pressure transmitter fails (R. B. Kitchen, by 4/30/85).
2. Change out both pressure transmitters on the slurry strippers to a more reliable model (Rosemount) (520 column completed 2/1/85, 530 column completed 2/26/85, R. B. Kitchen).
3. Review incident in all shift safety meetings (B. McWhirter, by 4/15/85).


B. E. McWhirter

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