Vinyl Chloride Transportation Committee

An Overview: April 1991 - September 1995

ACCOMPLISHMENTS

The Committee was formed in 1991 by manufacturers of vinyl chloride to promote greater safety in the transportation of vinyl chloride and to work with U.S. regulatory agencies and other organizations on transportation related issues.

In May 1992, the Committee formed a Vinyl Chloride Mutual Aid Network (VCNet) that provides technical expertise and assistance by the industry and contractors to emergency responders at vinyl chloride transportation incidents. VCNet plans to coordinate its activities with railroad and community response teams. The Committee has prepared a map that includes information on railroad transportation routes and industry, contractor, railroad, and selected community emergency response teams. The map enables CHEMTREC to activate VCNet in cases of incidents.

The Committee has developed an Emergency Response Operation manual to facilitate the operation of the mutual aid network among CHEMTREC, vinyl chloride manufacturers and users, emergency response contractors, and railroad emergency response teams. The manual also contains information on public communication in emergency situations.

The Committee has developed a Vinyl Chloride Safety Awareness Training Workshop. The workshop is directed at industry, contractor, and community emergency response personnel to provide them with a better understanding of the principles and techniques involved in responding to a vinyl chloride incident. The workshop provides a detailed view of health and safety risks that may be encountered in responding to vinyl chloride incidents. As part of the training, workshop attendees sometimes participate in a simulated vinyl chloride incident.

The Committee members, on a periodic basis, share non-proprietary plant safety, safe-handling, and distribution incident information on vinyl chloride to promote safety and to protect environmental quality during manufacture and distribution.

In August 1992, the Committee met with U.S. Department of Transportation (DOT) representatives to discuss the industry's concerns about the DOT required shipping label name, "Vinyl Chloride, Inhibited," under 49 CFR 172. 102. Most domestic shipments of vinyl chloride and shipments to Canada and Mexico are not chemically inhibited and therefore, would not be in the compliance with the shipping label name. The Committee provided scientific support that uninhibited vinyl chloride does not undergo a violent polymerization reaction over a short period of time. DOT agreed with the Committee and revised its Hazardous Materials Regulations through a Federal Register notice in October 1992.

In 1995, the Committee commented on the DOT's proposed implementation of the UN recommendations to align the U.S. Hazardous Materials Regulations with corresponding provisions of international standards. The Panel expressed concern that the proposed changes to the shipping name for vinyl chloride would effectively prevent vinyl chloride from being shipped domestically in its current state. The committee recommended that "Provision 21" be added to the proposed listing that would permit shipping of vinyl chloride in its current state and still maintain the alignment of the DOT regulations with corresponding international standards. In December, DOT published a final rule (HM-215A) that included the "Provision 21."

In March 1995, OSHA responded to the Committee's request for clarification of the applicability of the Vinyl Chloride Standard or the Hazardous Waste Operations and Emergency Response Standard when responding to vinyl chloride leaks. The clarification supported the Committee position that entry by properly trained personnel into unknown concentration or concentration greater than 36,000 ppm for non-life rescue operation is necessary to prevent catastrophic failure or explosion.

In April 1995, the Committee agreed to request the Association of American Railroads to docket a proposal to consider standardizing manways for newly constructed rail tank cars in vinyl chloride service. Adoption of such a standard would help to ensure that all newly constructed rail tank cars in VCM service are capable of accepting a transfer capping kit.

FUTURE PLANS

- The Committee will identify additional "for hire" contractors to provide emergency response services when necessary and will continue to conduct periodic mock emergency response exercises to ensure that CHEMTREC, "for hire" contractor response teams, and company response teams are aligned and can act quickly in case of an emergency.

- The Committee will continue its support for the Vinyl Chloride Safety Awareness Training Workshops to be held throughout the U.S. and will prepare a video on use of a capping kit in the transfer of vinyl chloride at an incident site and on the use of personal protective equipment.

- The Committee will work with Association of American Railroads to achieve its goal that all newly constructed vinyl chloride rail tank cars are capable of adapting a transfer capping kit.

- The Committee will comment on DOT's anticipated Tank Vessel and Facility Response Plans, and Response Equipment for Hazardous Substances mandated by the Oil Pollution Act of 1990 as appropriate.