

VISTA CHEMICAL COMPANY - ABERDEEN PLANT
PROCESS SAFETY MANUAL
APPLICABILITY

Page 1 of 2
Revision 1
PSM-002

Approved by: _____
Plant Manager

Date: _____
REGULATED 29 CFR 1910.119

1.0 PURPOSE & SCOPE

This document defines the applicability of the OSHA Process Safety Management regulation in the Aberdeen Chemical Plant. The Corporate Applicability Standard Dated December 12, 1995 was followed and is the basis of this document.

2.0 COVERED CHEMICALS

Chemicals handled in the plant that exceed the threshold quantity are Vinyl Chloride Monomer (VCM), Chlorine, and Propane. VCM is handled in the VCM Tank Farm Area and the New and Old Reactor areas. Chlorine is handled at the water plant, the reactor area cooling towers, and the compound cooling tower. Propane is handled in the propane facilities.

The following table lists the chemicals used at the Aberdeen Plant which meet the definition of a highly hazardous chemical per OSHA regulation 29CFR 1910.119:

Chemical Covered	Coverage Basis	Threshold Quantity	Maximum Intended Inventory
Vinyl Chloride Monomer (VCM)	Flammable Gas	10,000 lb	6 mm lb
Propane	Flammable Gas	10,000 lb	63000 lb
Chlorine	Listed Chemical	1500 lb	15000 lb

3.0 COVERED PROCESSES & PHILOSOPHY

Process equipment that contain VCM, Chlorine, and Propane and the following other equipment are subject to the standard. A set of master P&I Diagrams have been marked up to show which equipment is covered by the standard.

- 1) Interconnected piping and equipment. These are piping and equipment that are immediately upstream and downstream of equipment containing the covered chemicals. There is no reasonable potential for equipment beyond this to contribute to a catastrophic release. This is based on process knowledge and history.
- 2) Necessary Function Support Equipment - There are several systems that are necessary function support equipment. These include cooling water to the reactors, instrument air to the reactors, and the backup electric generator.
- 3) Diking - Due to the nature of the covered chemicals, diking in the plant does not contribute to the safety of a release of chlorine, propane, or VCM. These are all gases at ambient temperatures and pressures.

Units or subunits are excluded from coverage if they do not contain VCM, Chlorine, or Propane and are not interconnected piping and equipment or necessary function support equipment.

There are no equipment and systems that are covered by the standard that are not marked on the master P&I Diagrams excepted as listed below.

- 1) Chlorine addition system to the compound cooling tower. This includes the chlorine cylinders, pressure regulators, and tubing to the point that the chlorine is injected into the cooling water.

- 2) The Vinyl Unit Back up emergency generator.

4.0 NAMES AND QUALIFICATIONS

give me AND THE BOUNDARIES OF THE COVERED PROCESSES (See Section 3.0)

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The following people participated in the determination of applicability.

John Olson, Vinyl Unit Manager. John has 17 years of industrial experience including 8 years at the Oklahoma City PVC plant and 7 years at Aberdeen as the Unit Manager.

Ted Nickerson, Senior Principal Engineer, Technology Group. Ted has 15 years of industrial experience, all in PVC. This included 11 years of experience at Aberdeen. He has extensive background in OSHA PSM regulations and their applicability.

Jimmy Autry, Maintenance Manager. Jimmy has 12 years of industrial experience in Project Engineering and Maintenance. He has a total of 7 years experience at the Aberdeen Chemical Plant.

Veldon Messick, Technology Manager. Veldon has 20 years of industrial experience in process engineering, including 11 years in the Aberdeen Chemical Plant. Veldon is a Registered Professional Engineer in Texas.

Input on applicability was also received from Gary L Willcut, P. E. and Steve Flowers of TMS, Inc.

5.0 REVISION HISTORY

Description of the Change	Revision
General Revision	1

Gary / Janice:

This document follows Vista's "Applicability Determination" procedure pretty well. Do we intend to include the covered equipment, lines and instrument lists TMS is generating now in this document?

Bill Miller

~~NO NEED TO SEPARATE IN EQUIPMENT LIST~~

△ TO SATISFY AN AUDITOR, MIGHT EXPLICITLY CALL OUT INPUT FROM EMPLOYEES (EMPLOYEE PARTICIPATION) PREFERABLY AN OPERATOR OR MEMBER OF LABOR ORGANIZATION. WE HAVE SEEN THIS ADDRESSED BY OSHA —

SO, WILL THIS BE MADE AVAILABLE FOR REVIEW BY EMPLOYEES OF THE COVERED AREA?