BK-10
MCC 950920

Monsanto

FROM (NAME & LOCATION): S. G. Pappas - O-10

F/ S&C J. a. Glass

DATE : March 18, 1982

SUBJECT : Out-of-Plant Pipeline Emergency Response

REFERENCE :

cc:

PLAINTIFF'S EXHIBIT

MON-501

TO : PMSB

As a followup of the PMSB meeting held March 17, please review the attached proposal and submit your comments to C. F. Navarrete by March 31.

It was agreed that the responsibility for responding to a pipeline emergency would be the Distribution Department. An appropriate procedure for handling these emergencies will be developed utilizing as much as possible the emergency response team organization that currently exists.

A point of major concern was as to "ownership" of the out-of-plant pipelines. Should they be under control of one group or several as is currently the case?

Your comments are solicited.

S. G. Pappas, SAC

/ob
Enclosure

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STG 2430257

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IN-10
MCC 950920

Monsanto

FROM (NAME & LOCATION) C. F. Navarrete - O-10A

DATE March 18, 1982 CC: PMSB

SUBJECT Out-of-Plant Pipeline Emergency Response

REFERENCE

TO : G. L. Tromblee

SAC has reviewd the existing procedure on Pipeline Emergency Response and the concerns and deficiencies identified by Plant Services.

Our recommendation is:

1. A team approach, similar to that spelled out by the Transportation Accidents Procedure (P-0906), should be developed for Pipeline Emergencies.

2. Team membership should include:

   Key Person (with alternates)
   User Representative (depending on which pipeline)

   Industrial Hygiene)
   Environmental)
   MMTS) On call as needed.
   Public Relations)

3. Key person should be part of the manufacturing services groups, specifically distribution), and have routine as well as emergency responsibility for Texas City pipelines and rights of way.

   Routine responsibilities include:

   - maintenance
   - taxes
   - revisions to equipment
   - contact with Chocolate Bayou and suppliers owning other pipelines in which T.C. may be called to respond in emergencies.
   - ex plant operations

   This definition represents a realignment of responsibilities.

4. Emergency Team should have appropriate equipment for response shared with transportation emergency team).

5. Key person should be assigned responsibility to develop Emergency Response Procedure, propose team membership, determine necessary equipment, set up training of team, etc.

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6. Responsibility for valves and keys required for pipeline control should be specified in the procedure.

Background

Pipelines entering or leaving the plant fall broadly in three categories.

1. Pipelines for which Texas City has unique responsibility:

   - Two raw water lines
   - NH_3 line (two loops) from Dept. 10 to Dept. 19
   - Two benzene lines from Coastal
   - Clarifier waste water line to N. 80
   - 2 N_2 lines to Grant Ave. tie-in with Big 3
   - Waste water line to GCWDA
   - Propylene line from Amoco to Dept. 51

2. Chocolate Bayou to Texas pipelines.

   Texas City has "first response" responsibility in emergencies on these lines this side of Hitchcock.

3. Supplier owned pipelines to the T.C. plant.

   Should respond and get involved in emergencies on these lines to assist and protect our interests.

The following deficiencies have been identified on our current procedures:

1. MMTS corrosion inspector (singular) has assumed most of the pipeline responsibilities by default. These responsibilities more logically belong with operating groups.

2. The plant has too few people trained and familiar with pipelines, that may be convenient to report to the plant in emergencies.

3. Responsibilities do not logically fit with one single plant group as now organized and chartered.

4. Keys to locked valves on pipelines not easy to locate in emergencies.

5. Routine responsibilities for pipeline revisions, maintenance, taxes, etc., not clearly defined.

6. Equipment (radio, transport, keys, etc.) not adequate to handle emergencies.

C. F. Navarrete
Chairman, SAC

/ob

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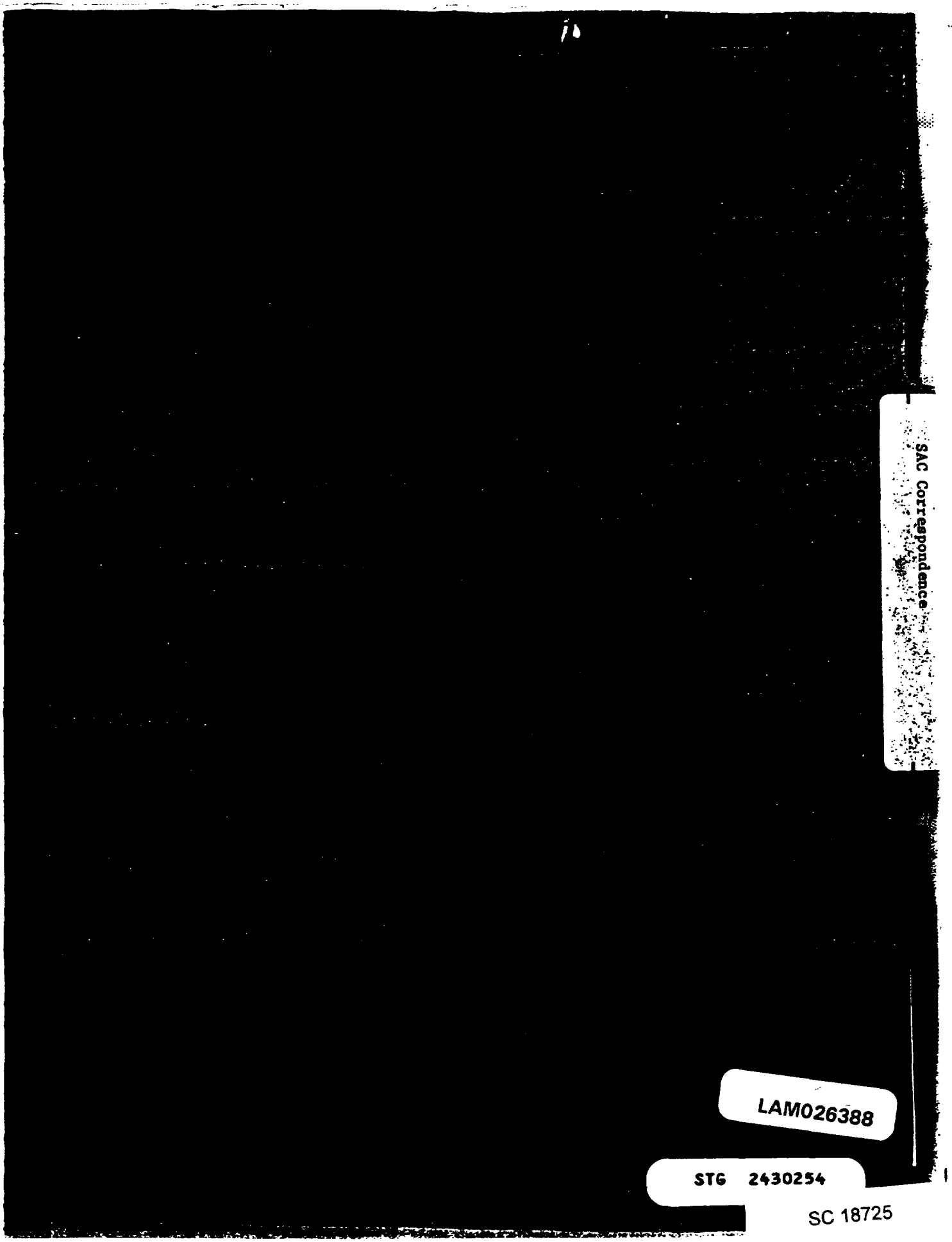
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