

UNION
CARBIDE

INTERNAL CORRESPONDENCE

JFE

HEALTH, SAFETY & ENVIRONMENTAL AFFAIRS

P. O. BOX 471, TEXAS CITY, TEXAS 77590

January 18, 1985

To: J. B. Leverton
Texas City Plant

Copy to: C. L. Dudnick - 500
S. J. Footer/F. S. Provenzano
R. A. Mendez
S. M. Norwood
R. C. Wise/O. H. Cunningham - 500

Subject: Texas Air Control Board Response to Written Report on VCM
Release at Soluton Vinyl Resins Process, No. 4 Stripping
Still Safety Relief Valves, January 7, 1985

Dear John:

The TACB Region 7 office in Bellaire has received our report of January 15, 1985 yesterday (January 17th) and I have just finished a conversation with the inspector from that office (Julian Williams) assigned to our plant. Mr. Williams informed me that this Regional Office will issue a Notice of Violation for this incident and we should expect it in a week or so. Included as a part of our response to this NOV is a conference at their offices to provide a compliance plan which is designed to prevent such releases in the future. They have tentatively set a date for this meeting: Tuesday, February 5, 1985 at 10:00 a.m. We will be expected to present a satisfactory plan at that time and they will then decide what disciplinary action to take, if any.

Mr. Williams indicated he believed we had already taken an important step toward such a plan by indicating our intentions of installing a dedicated condenser in the No. 4 stripper system. It is my understanding that this will be accomplished during the present unit shutdown which began January 11th, so this fact will constitute the major part of our response. In addition, we need to indicate the disciplinary action taken with our operating personnel in connection with the January 7th incident and also documentation of the remedial training actions for the rest of the operating and supervisory personnel in the unit, to be sure everyone understands the consequences of unauthorized VCM release to the air.

Accordingly, I will ask Sam Norwood (or his designated representative who can speak responsibly for him) to come with me with our written NOV response to the meeting on February 5th. Any UCC legal or management representatives whose presence is believed desirable are invited, of course. Any preliminary briefing necessary for this meeting can be arranged as soon as we receive the NOV letter. I will draft the NOV response using input from all concerned.

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Questions, comments and suggestions for our participation in this review and subsequent deliberations are welcome. Please contact me accordingly so that we can make an orderly unified presentation at the February 5th meeting.

Yours very truly,


J. F. Erdmann

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