

Route to
~~WRH/ROD/HM/OK~~ 1845/UB6

Any comments?

February 28, 1984

IRM/wil -

We should review
this report as
requested by WRH

with L. Charles
this along with the
forces taken by
BPA or criminal
be of
as well
as all
of us -

Will -
I would like to
review the data. I am
not sure I understand the
relative significance of some of
the data. I will define it etc. etc.

Messrs. T. Destefano
E. Gilbert
B. Graybill

Attached for your review is a copy of the final EIL risk assessment
document prepared by A. D. Little. In light of the delay in getting the material
from A. D. Little, the report has been forwarded to the insurance carrier with
the caveat that additional minor points may have to be clarified.

Paul
Paul M. King
D.K.
J.K.
I.K.

REIVED

MAR 01 1984

W. B. GRAYBILL

PMK/mr

Attachment

cc: L. Carothers
V. C. Pelletier

What this says is we have,
from an outsiders viewpoint, a
high risk situation at Lake Charles.
We have to have our people
review this report for each plant
and develop a program to
reduce these risks if possible. An
awareness of the risk must be
conveyed to our people so they know
they must have tight operating practices.

SL 080105

Inter-Office
Correspondence

PPG

To: W. B. Graybill

Date: March 27, 1984

From: R. J. Samelson

Location: 36 West - G.O.

Subject: EIL Insurance
Risk Assessment

As this report states, it is a composite of two categories of risk for each location:

1. Inherent Risks - those associated with physical, chemical and toxicological properties of materials handled at the site along with consideration of physical location of the site.
2. Manageable Risks - these are risks that can be controlled by the way we operate our business.

There is little that can be done about category 1. We do deal with hazardous and toxic materials, i.e. chlorine, caustic, benzene, chlorinated hydrocarbons, phosgene, vinyl chloride, mercury, etc.

In considering this aspect of our business, there is little doubt that Lake Charles ranks high. It handles large volumes of toxic materials in relatively close proximity to residential areas.

The ranking of Beaumont is based upon past production of organic lead products. I would suspect that this ranking should drop considerably as cleanup efforts are completed and these materials removed from the plant.

The limelakes at Barberton and salt and other potential contamination will keep the Barberton relative risk high. Reclamation and management of the limelakes may help some.

A review of category 2 shows generally good management with some exceptions:

1. Inspection and monitoring programs related to leaks and fugitive emissions can be tightened.
2. Beauharnois particularly needs additional emphasis on inspection-monitoring and also emphasis on SPCC. This was brought out by audits and is being addressed.
3. Spill containment programs implementing physical barriers to spills are not completely implemented at Natrium or Lake Charles.

I have a little trouble with the higher ranking assigned to Lake Charles. Perhaps some subjective weight has been given to the size of the operation. In my view, Beauharnois would have been at the top of the list.

R. J. Samelson
R. J. Samelson

RJS:db