



cc: Dan Jones
Anta Dial

State of Louisiana
Department of Environmental Quality



Edwin W. Edwards
Governor

February 1, 1995

William A. Kucharski
Secretary

CERTIFIED
Z 030 734 918

Mr. Bob Brady
Environmental Services
The Dow Chemical Company
P. O. Box 150
Plaquemines, Louisiana 70765

RE: DOW CHEMICAL COMPANY
GLYCOL II PLANT AND ENVIRONMENTAL OPERATIONS PLANT
AIR TOXICS COMPLIANCE PLANS

Dear Mr. Brady:

The Department is in receipt of your letter dated January 24, 1995. After reviewing your letter and the air toxics compliance plans, the Department request the following additional information:

Glycol II:

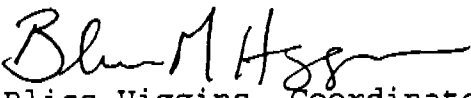
As per your letter, Dow plans to change the type of catalyst used to produce ethylene glycol in order to reduce the residual ethylene oxide without an additional reactor. Please provide documentation to describe the new catalyst and explain how this process change will eliminate ethylene oxide.

Environmental Operations:

The Department has determined that MACT for T-3B Wastewater Tank (EIQ# 5U) is 40 CFR 63.133(a)(1), which requires a fixed roof only. Please submit a response as to whether this tank meets MACT.

Please provide a response to the above items within 15 days of receipt of this letter. If you have any questions concerning this matter, please call Paul Miller at (504) 765-0109.

Sincerely,


Bliss Higgins, Coordinator
Air Toxics

BH:PM:pm

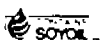
DO A136267
CONFIDENTIAL



recycled paper

OFFICE OF AIR QUALITY P O BOX 82135 BATON ROUGE, LOUISIANA 70654-2135

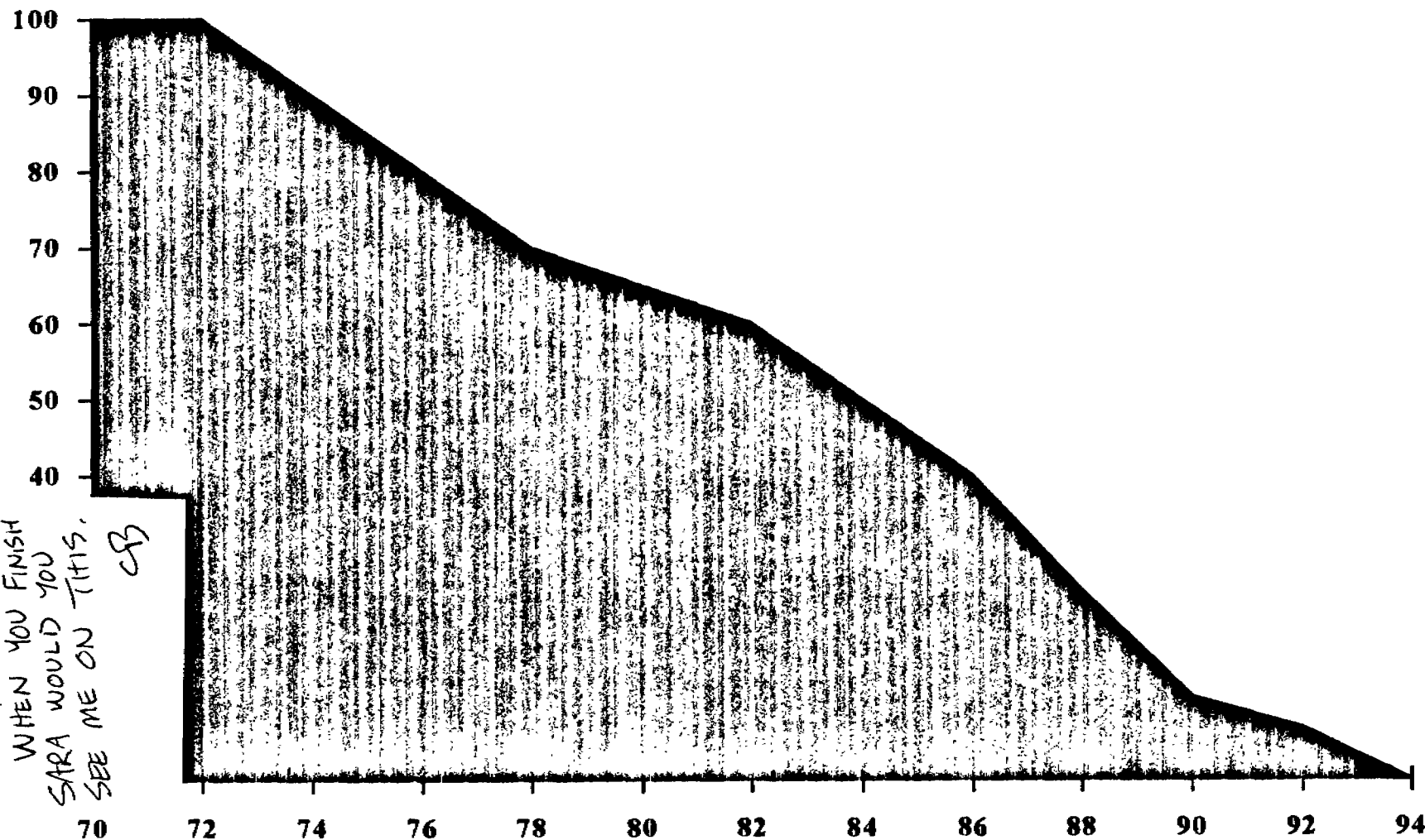
AN EQUAL OPPORTUNITY EMPLOYER



EMISSION REDUCTIONS

DO A136268
CONFIDENTIAL

DAN,
WHEN YOU FINISH
SARA WOULD YOU
SEE ME ON THIS.
CB



JAN-18-'95 WED 12:14 ID:DOW GLYCOL II 5301 TEL NO:FAX 504 353 6835

LAD MATERIAL REQUEST

JOB DESCRIPTION: _____ **DATE:** 1-18-55

REQUESTED BY: Don Jones MASTER # 097747 PHONE # 1774

COST CENTER: 76 WORK ORDER # SOURCE # SUPX.#

PRIORITY: _____ 1. EMERGENCY _____ 2. SPECIAL HANDLING X 3. ROUTINE

(SUGGESTED VENDOR): CMS (CONTACT): _____ (PHONE #): _____

ACTUAL NEED DATE: _____ (APPROVED BY): Caren A. Buckles

DATE ORDERED: 1-18-95 RECEIVED BY:

REQUISITION #: 11347395 LOCATION: _____

SPECIAL INSTRUCTIONS:

Please call me (Dana Dorsey) when delivered. ex 1776

DOW CODE 63671818 (TRIPLE FORM)

DO A136269
CONFIDENTIAL

JAN-18-'95 WED 12:14 ID:DOV GLYCOL II 5301 TEL NO:FAX 504 353 6835 #802 P02

(Job No.) _____

REQUESTED BY: Don Jones MASTER # 027747 PHONE # 1724

COST CENTER: 76 WORK ORDER # SOURCE # 172880 SUFX. # 410

PRIORITY: _____ 1. EMERGENCY _____ 2. SPECIAL HANDLING 3 3. ROUTINE

(SUGGESTED VENDOR): _____ (CONTACT): _____ (PHONE #): _____

ACTUAL NEED DATE: _____ (APPROVED BY): Carey A. Buckles

DATE ORDERED: 1-18-95 RECEIVED BY: _____

REQUISITION #: 11347423 LOCATION: _____

[illegible]

SPECIAL INSTRUCTIONS

Please call me (Dan Jones) when delivered.
842)

DOW CODE #3671918 (TRIPLE FORM)

DO A136270
CONFIDENTIAL

☐ DOW
☐ CONTRACTOR

Dow Chemical USA - Louisiana Division
Supervisor's Investigation of Accident/Incident
(Reference LAD S&LP S-305)

☐ Safety
☒ Environmental
☐ Quality

1

SAFETY CATEGORIES (Attachment 1)				ENVIRONMENTAL (Attachment 2)	GENERAL INFORMATION
Illness	Injury	Non-Injury			
☐ RMTC ☐ VC ☐ JAW ☐ Fatality	☐ RMTC ☐ RWC ☐ DAW ☐ Fatality	☐ Inj. Prevented ☐ PreCautionary ☐ First Aid PSA ? ☐ Yes ☐ No	☐ PSA ☐ Bus. Loss ☐ Dept. Rept. ☐ Internal	☐ Agency ☒ Dow ☐ Internal Plant	Date of Incident: <u>1/7/95</u> Time of Incident: <u>2:00AM</u> Date Investigated: <u>1/12/95</u> Date Report Submitted: <u>1/17/95</u>

Block in Which Incident Occurred: GLYCOL II Location within Block: DH-50
Name of Involved Employee: _____ Master or Social Sec #: _____
Employee Classification: _____ Time in Class (mos): _____
Time at Dow (mos): _____ Time on Job (mos): _____
Contractor Firm: _____ Contract Supervisor: _____

For Reactive Chemicals, Chemical Exposure, or Environmental Incidents:

Chemical Involved: MEG Quantity Released (lb): 2.2 TO CONTAINMENT
Spill Category: ☒ A ☐ B ☐ C (for Environmental Incidents only)

Short Incident Description (less than 10 words): PACKING FAILURE ON VALVE

Full Incident Description:
THE PACKING GLAND NUTS ON VALVE VIBRATED LOOSE CAUSING PACKING TO BACK OUT OF BONNET AND LEAK. PACKING WAS REINSTALLED BUT STILL LEAKING SLIGHTLY. A LEAK REPAIR COMPANY WAS CALLED TO PUMP THE VALVE. 0.69 POUNDS RELEASED TO THE SOIL.

Accident / Incident Type (Attachment 3): 363 Release to Containment (Dow)

Ir. /: _____ Body Part(s): _____

Job Being Performed (Attachment 4):
Group I: 100 Operation Routine Group II: 035 No Task

Causes At the Time Of the Incident: 810 Equipment Failure Pre-Existing Causes: 000 Unknown DO A136272
CONFIDENTIAL

(see Attachment 5 for Cause Definitions)

Root Cause (select one of above): 810 Equipment Failure

Follow-Up Actions:

Action: PUT VALVE ON LEAK REPAIR LIST TO BE CHANGED NEXT SHUTDOWN

Responsible (Name / #): DAVID STEELE Expected Date: 1/13/95 Actual Date: 1/13/95

Action: _____

Responsible (Name / #): _____ Expected Date: _____ Actual Date: _____

Action: _____

Responsible (Name / #): _____ Expected Date: _____ Actual Date: _____

Action: _____

Responsible (Name / #): _____ Expected Date: _____ Actual Date: _____

Action: _____

Responsible (Name / #): _____ Expected Date: _____ Actual Date: _____

Action: _____

Responsible (Name / #): _____ Expected Date: _____ Actual Date: _____

Action: _____

Responsible (Name / #): _____ Expected Date: _____ Actual Date: _____

Action: _____

Responsible (Name / #): _____ Expected Date: _____ Actual Date: _____

Action: _____

Superintendent's Signature

Investigated By
Form L-63 (Revised 1/93)

Signature of Injured

ORIGINAL: SAFETY OR ENVIRONMENTAL DEPT

COPY: SAFETY OR ENVIRONMENTAL SUPT, MAJOR MANAGER, LEGAL (INJURY OR AGENCY REPORTABLE), GLYCOL II FILE, RESPONSIBLE ACTION

GLYCOL II

LIQUID GLYCOL SPILL CALCULATIONS

GENERAL INFORMATION:

1. Notify Plant Security immediately after a release (even if you don't know the quantity)
2. Calculate the quantity of the spill and report within 30 minutes if possible
3. You MUST report the quantity of the spill within 60 minutes
4. Remember 1 pound or more is an agency reportable

The following calculation will allow you to determine the amount of a spill by using the dimensions of the puddle or wetted area of a spilled liquid.

$$A = L \cdot W \cdot D \cdot X \cdot Y \cdot Z$$

where A = amount of spill in pounds of glycol
 L = length of puddle or wetted area
 W = width of puddle or wetted area
 D = depth of puddle or wetted area
 X = 7.48 conversion factor for Ft³ to gallons
 Y = % glycol in puddle or wetted area
 Z = 9.26 weight of glycol per gallon

DATE / TIME: 1/7/95 17:00
MATERIAL SPILLED: DH-50/D-540

DIMENSIONS OF PUDDLE

ENTER ALL DATA IN FEET

(Enter only data needed in the shaded area)

(Use the chart at right to convert fractions into feet)

Length =	30
Width =	2
Depth =	0.0052
%gly	10

Pounds of glycol spilled =

2.17

0.69 to soil

Fraction	Feet
1/32"	0.0026
1/16"	0.0052
1/8"	0.0104
1/4"	0.0208
3/8"	0.0313
1/2"	0.0417
5/8"	0.0521
3/4"	0.0625
7/8"	0.0729
1"	0.0833

DO A136273
CONFIDENTIAL