

To: P. J. Kober

From: K. W. Birck
Date: January 14, 1988

Subject: Subpart V Compliance Project Training

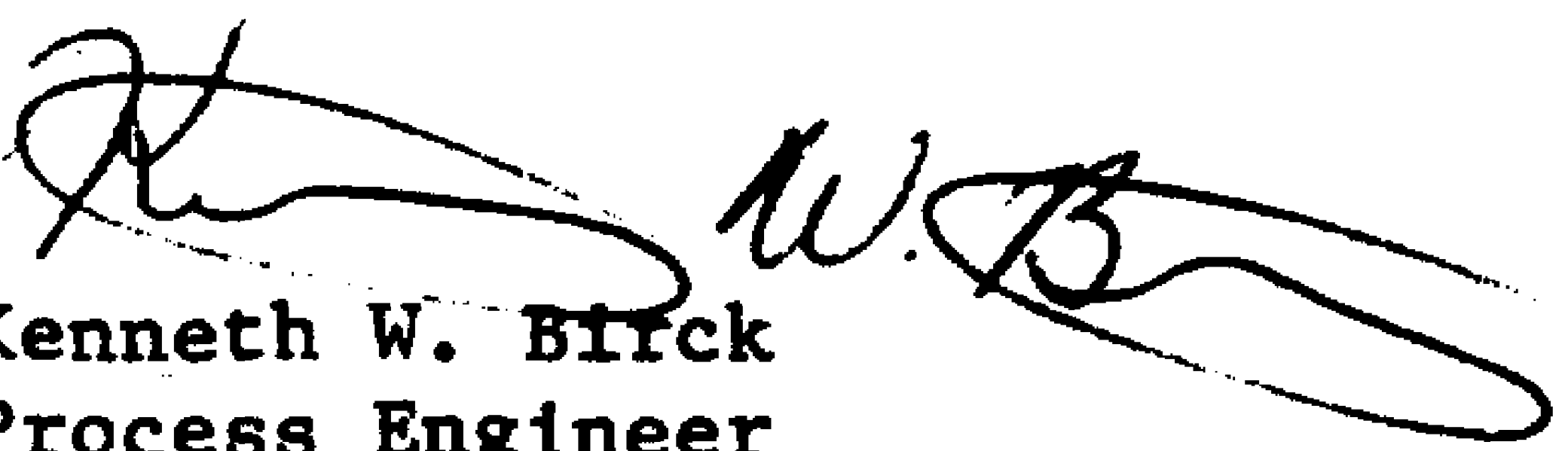
Interoffice
Communication

Installation of the Subpart V Compliance project has been completed. The next and final step is operator training which must be completed by 01-31-88.

Attached is an outline of the information that will be discussed with each vinyl operator, chief lead and supervisor. They will be asked to sign a training sheet signifying that they have been told and understand each item on the outline.

I will coordinate the training schedule with JME.

If you have any questions or comments, please contact me so that they can be included in the training.


Kenneth W. Birck
Process Engineer

nrs

attachment

cc: JF, JWW, RAF, DFJ, JME, VEM, JEN, TFL
File: 8.1.10

KWB

Ken, one revision then, is to include exception from regulations IF notes. If no other comments are received, can make IF's correction with footnote.

VEM
This is not consistent w/ the reg.
It says every open-ended line must
be flanged, plugged, etc. That's not
true — — sewer valves or rx chg manifolds.

 **VISTA**

SUBPART V COMPLIANCE PROJECT TRAINING

A. Regulation

1. Open-ended valves or lines - definition.

Any valve except relief valves having one side in contact with the process fluid (VCM) and the other side open to atmosphere either directly or through piping. E. G.- an unplugged valve.

2. Standards for open-ended valves or lines.

1. Every open-ended valve or line must be capped, blind flanged, plugged or have a second valve.
2. The cap, blind flange, plug or second valve must seal the open-end at all times except during operations that require flow through the open-ended valve or line.
3. Each open-ended valve or line equipped with a second valve must be operated such that the process side valve closes before the second valve.
4. For double block and bleed arrangements. The bleed valve(s) may remain open only during operations that require venting. At all other times they must be sealed.

B. New Installations/Procedures for Subpart V Compliance

1. Atmospheric Vent Valves

- a. A second valve was installed on all reactor atmospheric vents.
- b. Each new valve has position switches and control room position indication.
- c. Existing pushbuttons control both these new valves and the old valves.
- d. Existing interlocks apply to both valves.

2. Catalyst and BME Valves

- a. A second (block type) valve was installed on all the catalyst charge/normal kill lines for all reactors and the BME charge lines of D-700 and D-745.
- b. Limit switches are installed on each new valve with both field and panel indication of the valves position.

4

SUBPART V COMPLIANCE PROJECT TRAINING

B. New Installations/Procedures for Subpart V Compliance

2. Catalyst and BME Valves (continued)

- c. Control of the existing and the new valve is by a single switch located at the reactor.
- d. The panel mounted emergency close button includes both the new and the existing valve.
- e. New panel mounted emergency close buttons were installed for D-700 and D-745 catalyst and BME valves. Two buttons on each reactor.

3. Incinerator

- a. An additional block valve was installed on each inert feed line.
- b. An additional bleed valve was installed on each inert feed line bleed valve at the incinerators liquid seal flame arrestor.
- c. The block valves will close then the bleed valves open when the incinerator goes to low fire.
- d. The bleed valve will close then block valves open when the incinerator goes to high fire.
- e. A pressure switch has been installed in the inert feed line. It is set at 40 psig to close the recovered VCM receiver remote operated valve when inert feed pressures to the incinerator exceed 40 psig.