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Interoffice Communication

To VCM Plant Employees
From J. A. DeBernardi
Date February 9, 1981
Subject Deregulation of Area #4 - Tank Car Loading Pumps

I am pleased to report that based on analysis of data generated by the Honeywell fixed point monitor, personnel dosimeter sampling results, and normal time intervals employees are in the tank car loading pump area, this area has been deregulated effective February 9, 1981. The data analyzed indicates during normal operation that potential employee exposure over the OSHA permissible limit for VCM has been eliminated in this regulated area.

These results can be attributed to engineering changes and improved work practice controls that have reduced or eliminated such exposures in the tank car loading pump area during normal operations.

1. A closed sampling system for VCM has been installed which vents to the incinerator system.
2. Tandem pump seals have been installed on the loading pumps with seal oil pots vented to the incinerator system.
3. Rupture disks have been installed under relief valves in this area to protect the valves from premature discharge.

The fixed point monitoring point located in the tank car loading pump area will continue to function as an exposure warning system. Notification of excess VCM concentrations will be made from the control room to personnel in the area should they occur. Appropriate respiratory protection equipment will be used by personnel should this occur until the problem causing the excess concentration is found and eliminated.

Deregulation of this area does not alter our established procedures related to use of respiratory protection equipment when breaking into process lines or vessels, or the necessity to seek out and repair leaks that may occur in the area or in other areas of the general plant.

J. A. DeBernardi

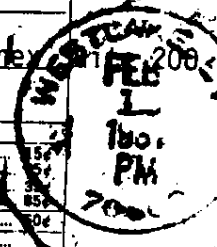
is
CC: JWW-GLF-JRH-CWT-WRH-JHB-PLF
Safety Bulletin Boards
Supervisors

CCR 000080965

No. 316138

RECEIPT FOR CERTIFIED MAIL—30¢ (plus postage)

SENT TO Attn: Joe Ansley, Area Director U.S. Dept. of Labor - OSHA		POSTMARK OR DATE
STREET AND NO. 2156 Wooddale Blvd. Hoover Annex		
P.O., STATE AND ZIP CODE Baton Rouge, LA 70806		
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PS Form 3800
Apr. 1971

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* GPO : 1974 O - 551-454

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3. ARTICLE DESCRIPTION:	REGISTERED NO. 316138 INSURED NO.
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PS Form 3811, Aug. 1978

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☆ GPO : 1978-272-382

CCR 00080966

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CONOCO

Lake Charles VCM Plant

CERTIFIED MAIL #316138
RETURN RECEIPT REQUESTED

Conoco Chemicals Company
A Division of Conoco Inc.
P.O. Box 605
Westlake, Louisiana 70669
(318) 491-5211

February 10, 1981

U. S. Department of Labor
Occupational Safety & Health Administration
2156 Wooddale Boulevard
Hoover Annex, Suite 200
Baton Rouge, LA 70806

Attention: Mr. Joe Amsley, Area Director

Gentlemen:

Pursuant to Title 29, Chapter XVII, Part 1910.1017(n)(1) of the Occupational Safety and Health Standards for Vinyl Chloride, this letter is to inform you that portions of this plant were deregulated on February 9, 1981.

One area that is now regulated and the average number of employees in this area per day during normal operations, including maintenance is:

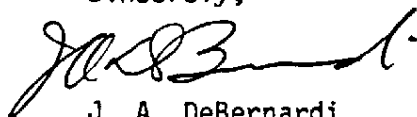
Regulated Area

2

No. of Employees

4

Sincerely,



J. A. DeBernardi
Plant Manager
Conoco VCM Plant

is
BCC:
T. G. Grumbles - Houston
RDG-GLF-JWW-JRH-CWT

CCR 000080967