

BF Goodrich

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Chemical Manufacturers Ass.
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Dear Has:

Per the latest grid on unfinished business for Goodrich to reply,
I reviewed each subject and have the following comments:

Item 16.0 Review of Delaware Valley VC Training Manual for
1992 VNet Training Manual.

A. Beginning on page 13 discussing hazardous materials, this section should be reduced to the physical hazards that Vinyl Chloride possesses. The Chemical Reactions section may be eliminated because MSDS data will tell what Vinyl Chloride cannot be combined with. The section on definitions should remain on pages 15 and 16. BLEVE should remain on p. 16 and the flammable limits graph should remain. Hazardous chemical properties for organic chemicals should remain since VC is an organic compound but the other ones should not be covered. Again we need to reduce the quantity of material.

B. The entire section of HAZWOPER should not be in a VC training book. This regulation applies to all hazardous material responses and can easily be covered under other training modes.

C. Beginning on page 53, toxicology definitions and the effects of VC should be stated. Defining LD ₅₀ would be necessary since this is how VC is described. All other information should not be in the VC training manual.

D. Page 65 should be presented for only those items that may work to patch a tank car or pressure container which VC is carried. The 55 gallon drum patching data is not useful for VC containers. The VC tank car capping kit should be presented. Only those for chlorine are shown for compressed gases.

E. Again the training manual should tell how VC affects respiratory breathing and correct protective devices should be chosen for VC activity. The SCBA checkout procedures etc. should be another separate training session.

F. Protective clothing beginning on page 91 should be discussed in actual needs and not how one goes about picking the equipment. The table page 94 doesn't say what is resistant to VC. Material selection is needed for low acceptable permeation.

G Site Entry on p. 95 should give levels of VC and level of protection recommendations. Whether one can enter without a total encapsulated suit should be stated for given concentrations.

H. Containment on p. 105 should not be a part of a VC package since it is a compressed gas. VC spilled on water should be discussed as its affect in dissolving in the water and the fact it will evaporate immediately.

I. Communications on p. 117 is for all emergency response thus should not be a part of the VC package.

J. Sight Entry: The measuring tools for VC must be stated such as the H-Nu and Detector tubes. The toxic exposure effects must be given for the obvious reasons. There is data that gives the vapor cloud dispersion rates for VC. With this information the work zones can be discussed in detail. This is an important study to determine not only work zones but evacuation needs.

K. Beginning p. 143, the incident command system is a functional part of all emergency response, thus should not be a part of the VC training. This should be a subject all in its self.

L. On p. 165 industry has good equipment for measuring VC. They should be stated and learn where they can be obtained quickly. The other information pertains to all chemicals and should be a separate issue.

M. On p. 173 decontamination solutions for VC must be stated but the subject must not be specific to VC. A way to verify that VC is or is not contaminating the person should be determined.

N. On p. 187 Incident Analysis, VC should be picked and the incident analysis information for response walked through. BE specific to VC in controlling it affect on land, water, and air.

O. Finally, the TIPS document is a must for all VC responses. It should be taken to all incidents and used as the situation dictates. It is a good concentration of information for Vinyl Chloride.

ITEM 14.0 LIST OF POTENTIAL INVITEES TO TRAINING PROGRAM

Due to Goodrich's location the following groups should be invited to the VC training session at Lamar:

- A. PADUCAH AND LOUISVILLE RR. AND LARGE CITY FIRE DEPTS.
- B. ~~ALONG THE ROUTE FROM PADUCAH TO LOUISVILLE, KY.~~
CALVERT CITY FIRE DEPARTMENT

- C. PADUCAH FIRE DEPARTMENT
- D. ILLINOIS CENTRAL GULF RR
- E. CONRAIL RR.
- F. CSX RR.
- G. STATE FIRE MARSHALL AND DES COORDINATORS OF KENTUCKY.
- H. AMERICAN ASSOCIATION OF RAILROAD PERSONNEL FOR SECTORS OF VCL MOVEMENT IN THE U.S.
- I. REPRESENTATIVES OF CAR BUILDERS AND/OR CAR REPAIR SHOPS THAT HANDLE VCL. EMPAC AND UTLX AT VALDOSTA, GA GAS FREE VC CARS THUS SHOULD ATTEND OUR SESSIONS.

ITEM 15.0 NUMBER OF ATTENDEES EXPECTED FROM GOODRICH.

Is expected Goodrich will have up to 15 members. They would come from Avon Lake, OH, Henry, IL., Pedricktown, NJ., Louisville, KY., Cleveland, OH., Calvert City, KY., Niagara Falls, Ontario, Canada., Plaquemine, LA.

ITEM 17.0 COMMENTS ON DRAFT WORKSHOP BROCHURE

The subject matter needs to be specific for VC. The introduction to tank cars should discuss the 105-J-300 class that most VC is shipped in.

The OSHA 1910.120 is required for all hazardous material responders, thus should not be a part of this school. I would recommend chemical compatibility issues which can be serious when other tank car products are released along with VC.

The TIPS sheets go into the VC cloud dispersion ranges for various release rates. A review of evacuation needs would be important.

Problem solving: When a tank car is punctured on top and the liquid has auto refrigerated to 7° F., it will take weeks to boil off the remaining liquid. Can we discuss how the remaining liquid can be removed so the wreck scene can be cleaned up.

On protective equipment, I hope we can conclude material and possible brands and styles that will be acceptable for VC response. General discussion on all the types, styles etc. doesn't conclude anything.

Frank Sollman
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Has: I hope this closes my grid for a while.