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FROM (NAME & LOCATION) C. F. Navarrete - O-10A

PLAINTIFF'S EXHIBIT

MON-502

DATE March 15, 1982

cc: PMSB

SUBJECT Out-of-Plant Pipeline
Emergency Response

REFERENCE

TO : G. L. Tromblee

↓
*SAC member: Please review/comment
J.A. Blair & return to Paffos
for Olga to re-type.*

*CFN/lt
3/15*

SAC has reviewed the existing procedure on Pipeline Emergency Response and the concerns and deficiencies identified by Plant Services.

Our recommendation is:

1. A team approach, similar to that spelled out by the Transportation Accidents Procedure (P-0906), should be developed for Pipeline Emergencies.

2. Team membership should include:

Key Person (with alternates)
User Representative (depending on which pipeline)
Industrial Hygiene)
Environmental)
MMTS) On call as needed.
Public Relations)

3. Key person should be part of the manufacturing services groups ^{specifically} (either distribution ~~or utilities~~), and have routine as well as emergency responsibility for Texas City pipelines and rights of way.

Routine responsibilities include:

- maintenance
- taxes
- revisions *to equipment*
- contact with Choc. Bayou and suppliers owning other pipelines in which T.C. may be called to respond in emergencies.

This definition represents a realignment of responsibilities that ~~Plant Staff should address.~~

4. Emergency Team should have appropriate equipment for response (possibly shared with transportation emergency team).
5. Key person should be assigned responsibility to develop Emergency Response Procedure, propose team membership, determine necessary equipment, set up training of team, etc.

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6. Responsibility for valves and keys required for pipeline control should be specified in the procedure.

Background

Pipelines entering or leaving the plant fall broadly in three categories.

1. Pipelines for which Texas City has unique responsibility:

- Two raw water lines
- NH₃ line (two loops) from Dept. 10 to Dept. 19
- Two benzene lines from Coastal
- Clarifier waste water line to N. 80
- 2 N₂ lines to Grant Ave. tie-in with Big 3
- Waste water line to GCWDA
- Propylene line from Amoco to Dept. 51

2. Chocolate Bayou to Texas ^{CITY} pipelines.

Texas City has "first response" responsibility in emergencies on these lines this side of Hitchcock.

3. Supplier owned pipelines to the T.C. plant.

Should respond and get involved in emergencies on these lines to assist and protect our interests.

The following deficiencies have been identified on our current procedures:

1. MMTS corrosion inspector (singular) has assumed most of the pipeline responsibilities by default. These responsibilities more logically belong with operating groups.
2. The plant has too few people trained and familiar with pipelines, that may be convenient to report to the plant in emergencies.
3. Responsibilities do not logically fit with one single plant group as now organized and chartered.
4. Keys to locked valves on pipelines not easy to locate in emergencies.
5. Routine responsibilities for pipeline revisions, maintenance, taxes, etc., not clearly defined.
6. Equipment (radio, transport, keys, etc.) not adequate to handle emergencies.

/ob


C. F. Navarrete
Chairman, SAC

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