



## Interoffice Communication

To John Pinkman - Houston  
From John Friend  
Date June 3, 1977.  
Subject Requirements for EDC Ships

I received your letter on this subject and have the following replies to your questions:

- 1) In your Item No. 3, it is a CONOCO safety standard that any vessel which is to be entered must be blinded. We have deviated from this standard when inspecting tanks on ships which contain no cargo. However, when cargo is on-board, the tanks to be entered must be physically separated from loaded tanks. Physical separation is normally achieved by blinding or removing pipe spools. On new ships, which have independent systems for each tank, the tanks may already be physically separated. However, I must caution that due to the complexity of many ships' piping systems, the inspector may require blinding if it is not obvious to him that a tank is physically separated from loaded tanks. We require that our employees follow the safety rules for vessel entry and cannot allow deviations due to cargo size, cost, etc.
- 2) In your Item No. 2, inert gas purging is not considered to be acceptable for two reasons. First, on some VCM ships that plant personnel have inspected, there has been a black soot-like material on the tank walls. Some ships have claimed that this material comes from malfunctions leading to incomplete combustion in the inert gas generators. Second, the carbon dioxide from inert gas generators could cause oxygenate impurity problems with the EDC or the VCM made from the EDC.

If you have any further questions or comments, we will be happy to receive them.

John Friend

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