

KELLER AND HECKMAN

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202 295-2700

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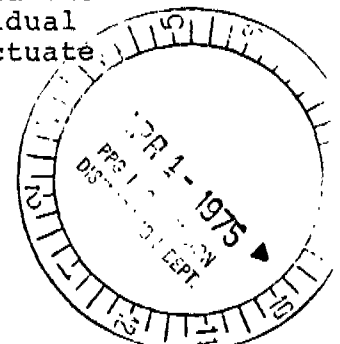
April 1, 1975

Re: Labeling and Transportation
of VCM and PVC Under the
OSHA Standard

We are certain you are aware by now that the Supreme Court acted on Monday, March 31, to deny the request for stay of the OSHA Standard. Accordingly, the OSHA Standard becomes effective as of this date.

Following-up on our meeting of March 20 with members of OSHA's staff concerning the labeling and other transportation issues relating to the Standard for Exposure to Vinyl Chloride, as reported in our letter of March 21, we have submitted a formal request for interpretation to the Occupational Safety and Health Administration. A copy of that request, without the two placard exhibits, is associated with this letter. As you will note, in addition to requesting interpretation with respect to the labeling program adopted by the Ad Hoc Committee and the application of the labeling requirement to existing inventories, we have also requested an interpretation to exempt export shipments from labeling and also an interpretation or rule change to facilitate the movement of samples. We will, of course, be following up on this request and keeping you advised of all pertinent developments.

In our letter of March 21, we discussed the issue of whether PVC materials having a low residual monomer content must be labeled and otherwise actuate



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the monitoring and training requirements of the Standard, or whether such materials may be classified as fabricated products and so excluded from the scope of the Standard. In further discussions with the OSHA staff, we are advised that this issue is still under consideration.

This issue arises in light of the definition in the Standard of fabricated product as that

made wholly or partly from polyvinyl chloride, and which does not require further processing at temperatures, and for times, sufficient to cause mass melting of the polyvinyl chloride resulting in the release of vinyl chloride.

We were advised that OSHA interpreted that PVC materials which are not subject to mass melting during processing, and *which do not otherwise release VCM to create an exposure above the action level without the application of engineering or work practice controls*, may be classified as fabricated products. OSHA is looking to apply the same reasoning to PVC materials which, although mass melted, contain such a low amount of residual monomer they do not release the monomer either in mass melting or *otherwise*, again without the necessity for engineering or work practice controls. Inasmuch as the Standard is intended to safeguard against exposure to vinyl chloride, the philosophy of interpretation and enforcement is that regulation is not required where there is no risk of an exposure above the action level. Be cautioned, however, that this approach is still unofficial.

Julie Cahn has reported in her memo of March 26 concerning the hearing before the National Classification Board with respect to the proposal for vapor proof packaging of PVC. It appeared during that hearing that the ATA staff, as distinguished from the carriers handling PVC materials themselves, were reacting without knowledge of the regulatory or practical aspects of the regulation. It was admitted they did not realize that the Standard

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applied to the movement of packaged materials until very recently and further that their primary concern related to restricting employee exposure so to avoid the medical surveillance requirements of the Standard. Furthermore, the Classification Board was looking to adopt a rule of general application to all OSHA-classified carcinogens in order to avoid the necessity of case-by-case consideration. As of the date of the Classification Board hearings, none of the ATA groups representing the packaged goods carriers had taken any action with respect to facilitating carrier compliance with the OSHA Standard.

As indicated in Mrs. Cahn's memorandum, it was finally agreed that we would meet with the Hazardous Materials Subcommittee of the Council of Safety Supervisors of the ATA on Thursday, March 27, to discuss procedures for implementation of the Standard. That meeting was attended by Ed Begnaud, of B. F. Goodrich, Phil Cupertino of Stauffer Chemical and the undersigned. As a result of that meeting, the ATA Safety Department will prepare an informational bulletin to advise the ATA members of the Standard and to recommend handling procedures to minimize exposure to residual monomer. In the meantime, the Classification Board will hold the proposed packaging rule in abeyance.

In conjunction with our discussion with the Hazardous Materials Subcommittee of the Council of Safety Supervisors the issue was raised of identification of PVC materials from the standpoint of notice to the carriers. We had previously been advised that the Chairman of that Subcommittee is considering issuance of a Classification proposal to establish a description for polyvinyl chloride distinct from that of plastic materials. During that meeting, it was indicated that some shippers were intending to identify the presence of PVC materials on the bill of lading. Several producers who intend to employ this practice have advised me that identification of PVC will be contained within the description of plastic materials and not as a separate entry on the shipping papers. The adoption of such a practice on a voluntary basis, limited of course to those PVC materials which are subject to the Standard and not those which may be classi-

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fied for OSHA purposes as "fabricated products", should serve to forestall any effort to change the Classification and the problems which would attend that action.

For your information, I have been advised this date that the AAR intends to file an objection with the FRA concerning the approved modification of the DOT placard to include the OSHA-prescribed cancer-suspect agent warning. The AAR attorney advised me that they consider the FRA approval to constitute a rule amendment which is unlawful due to the fact that it was adopted without notice and appropriate rule making procedures.

Finally, please be advised that the Coast Guard intends to publish its regulation relating to carriage requirements of vinyl chloride moving by tank barge and tank ship within the next several days. The Coast Guard has withheld action until now pending a determination of the status of the OSHA Standard. With the denial by the Supreme Court of the request for stay, the Coast Guard is moving forward with its regulation. Upon issuance, we will be back in contact with you and those who have been specifically participating in that proceeding with further details.

Should there be any questions or desire to discuss any of the foregoing items, please feel free to contact me.

Cordially yours

Martin Benavici

enclosure

cc: PVC/VCM Ad Hoc Study Group

SL 091250

PROCEEDINGS
COMPRESSED GAS ASSOCIATION
AD HOC COMMITTEE ON VINYL CHLORIDE

MINUTES - Fifth Ad Hoc Committee Meeting on Vinyl Chloride.

PLACE - Waldorf-Astoria, Park Avenue & 50th Street, New York, New York.

TIME - This meeting was held on 1/21/75 in the Conrad Salon at 8:30 a.m.

THOSE ATTENDING:

C. K. Dilley	PPG Industries, Inc.
J. F. Knott	PPG Industries, Inc.
R. E. Wilson	Stauffer Chemical Company
Jan VanLaer	Stauffer Chemical Company
J. A. Borrer	Diamond Shamrock Chemical Company
C. Edmonds	Diamond Shamrock Chemical Company
T. R. Dickey	U.S. Coast Guard
E. A. Phillips	Union Tank Car Company
R. A. Boerke	North American Car Corporation
H. R. Blain	Borden Chemical
C. B. Meltzer	Shell Oil
R. J. Holden	Bureau of Explosives
J. R. Hopkins	Dow Chemical
M. M. Anderson	Union Carbide Corporation
E. G. Dietz	Union Carbide Corporation
R. Pucci	Conoco Chemical/Continental Oil
G. E. Fitzgerald	ACF Industries, Inc.
D. G. Soucher	ACF Industries, Inc.
A. E. Price	General American Transportation Corp.
W. C. Koch	Allied Chemical Corporation
R. C. Collins	Allied Chemical Corporation
R. E. Gribben	Allied Chemical Corporation
E. Sigeti	Allied Chemical Corporation
P. Mann	Scott Environmental Tech.
T. P. Harvey	Scott Environmental Tech.
W. F. Black	Federal Railroad Administration
J. R. Egan	Republic Car Line, Inc.
J. Portis	Midland Manufacturing
J. E. Allen	Tenneco Chemical, Inc.

UNFINISHED BUSINESS

U-1) MINUTES OF THE PREVIOUS MEETING

The minutes from our Seaview Meeting, dated June 1974, were approved.

U-2) DOCKET 68-8 EMERGENCY KITS FOR TANK CARS

This Task Force had an informal meeting on January 20, 1975, in C. K. Dilley's hotel room. The purpose of this brief meeting was to hear various reports from Working Groups on this Task Force on their progress since our November 14, 1974 meeting in Sharon, Pa.

KIT I - Bell Design Safety Kit. A revised Drawing #00-1230-127-C was distributed by Al Price (for Charlie Graves) at this Task Force meeting. Materials have been ordered and received by GATC for the fabrication of this Kit. The Gasket Working Group (G. Fitzgerald, B. Wilson, C. Graves) will provide appropriate gasketing test materials for this Kit.

KIT II - Individual Valve Safety Kit. This design is still in the study phases and will be more thoroughly evaluated in February by C. Dilley and J. Portis. The application for this Kit may prove to be more beneficial for new equipment if at a later date a standard dome arrangement is decided upon.

KIT III - Manway Bonnet. Another idea has been suggested by E. Phillips and John Carlton of UTC for the potential application of the existing Manway and Cover Bonnet as part of the Kit.

This Task Force will schedule a meeting when Charlie Graves has advised us of his progress on the fabrication of Kit I.

U-3) DOCKET 74-18 MUTUAL AID PROGRAM

We regret to report that Dick Phillips of Ethyl Corporation has requested to be replaced on this Task Force. Clyde Meltzer of Shell has volunteered to take over Dick's responsibilities in this program.

Since the agenda (dated 1/7/75) indicated a report of progress would be made in establishing formal notification for the support of such a program, a draft letter for Task Force and member approval was handed out at the meeting by C. Dilley for their review and discussion. This information will be incorporated into the Mutual Aid file and used at some later date as necessary.

U-4) DOCKET 69-22 AAR-RPI RESEARCH REPORT

Earl Phillips provided this Committee with an up-to-date report on protective coatings, couplers, and methods of attachment for head shields.

A Progress Report #30 was passed around for Committee members file, this report was dated 11/13/74 and covered AAR-RPI activity for the month of June through August 1974.

U-5) HEEL ALLOWANCE STANDARD FOR SAFETY

This Docket item received no discussion and was removed from Docket.

U-6-73) JUMBO T/C OPERATIONAL & MAINTENANCE PROBLEMS

C. Dilley expressed an interest in this Docket item as a result of maintenance problems encountered on 125 ton truck cars of 32,000 gallon capacity. Our center plate casting and body bolster problems are being tested by experimenting with various modifications and light loading of equipment. There aren't sufficient statistics available on the effectiveness of these modifications to pass on to Committee at this time.

U-7-74) GAUGING DEVICES

Bob Wilson introduced several gentlemen from National Sonics who gave a presentation on their liquid level sensing device. Approximate costs were mentioned for Task Force evaluation purposes, but will not be included in the minutes of this meeting. A Task Force report is attached for your review. Bob's Task Force will continue to review and advise this Committee on gauging devices.

Several shippers are in various stages of testing the Midland Tape (B-630) and Stick (B-612) devices on VCM equipment. Their service trial experience will be submitted through this Task Force and passed on to interested shippers.

U-8-74) EXPOSURE STANDARDS FOR VCM

An interest was expressed by shippers in the cleaning method and procedures used by car manufacturers and their repair facilities for VCM equipment.

Part I - Cleaning procedures used when a car is scheduled for any exterior tank repair (head shield attachment, center plate work, dome repairs, etc.)

Part II - Cleaning procedures used when cars are to be tank tested or interred by personnel (assuming no protection equipment or special clothing).

Note: Shippers have a real concern in there procedures and may be able to provide manufacturing with better ideas on how to handle this type cleaning as lower limits of VCM exposure approach less than one part per million.

U-9-74) VCM DETECTION DEVICES

To be continued on the agenda as time did not permit us to discuss at this meeting.

U-10-74) OSHA REQUIREMENTS FOR LABELING VCM EQUIPMENT

This Docket received much discussion, a brief account of motions made and votes is outlined. One vote per member.

First order of business was to see if the November 15, 1974, recommendation (see attached) was to be revised. It was decided there was little interest by those member companies present. Motion: "The November 15, 1974, proposal is no longer acceptable to this Committee." This motion was second and approved with the exception of one opposing who wished to be recorded. Opposed - Dow.

Second order of business was the discussion of alternate labeling and/or placarding systems. Motion: "The markings on the placard and/or label would be one of the systems recommended to the S.P.I. Tank Force on 1/23/75."

Part I of this second motion was for those who wanted the placard or labeling system. Preferred Method: 8 voted for the placard and against label. Least Preferred: 5 voted for the label and against placard. Note: Two companies voted twice, 2 of 8 and 2 of 5.

Part II of this second motion was to vote for or against on both (and) or either (or) of these systems. Preferred Methods: 8 votes against this recommendation. Least Preferred: 2 votes for this recommendation.

Third order of business involved a discussion on whether we should try and resolve our difference and see if an unanimous decision could be made for one system or the other, Placard vs. Label. The discussion showed that at least one company voting for the placard system would be unable to change their company's expressed opinion at this meeting on the use of the label.

Motion: "It is the unanimous decision of this committee to adopt the placard system." The vote was unanimous - 10 for the placard, 0 against the placard.

Fourth order of business was for C. Dilley to advise Tom Smith, Chairman of the S.P.I PVC/VCM Ad Hoc Committee, of our recommendation for the placard. This was done on 1/22/75, see attached teletype.

Note: There was discussion at the Committee by Bill Black of the FRA as to whether cars stenciled with the November 15, 1974, recommendation would be allowed to move through interchange.

U-11-74) CGA PAMPHLET P-1

This item will be continued on Docket as time did not permit us to discuss at this meeting.

U-12-74) CGA COMPRESSED GAS HANDBOOK - CHAPTER ON VCM

This item will be continued on Docket as time did not permit us to discuss at this meeting.

U-13-74) HM 109 - HEAD SHIELDS

This item will be continued on Docket as time did not permit us to discuss at this meeting.

U-14-74) HM 103 & 112

This item will be continued on Docket as time did not permit us to discuss at this meeting.

NEW BUSINESS

N-2 SLIDE PRESENTATION ON THE SP DERAILMENT NEAR HOUSTON (ANGLETON YARD) ON SEPTEMBER 21, 1974.

Clyde Meltzer of Shell narrated a slide presentation and provided a summary of various reports on the derailment and explosion in the SP Angleton Yard.

N-5 BARGES, TANK TRUCKS AND OTHER CONTAINERS

This item will be continued on Docket as time did not permit us to discuss at this meeting.

N-6

REVISION OF VCM MEMBERS ADDRESSES

It will be necessary to revise and update our address list and divide into two parts for convenience reasons.

I. VCM Committee Members - will be a list made up of regular voting members. This list will represent a contact in each company where quick communication can be made by telegram, teletype, phone, etc. This will standardize and reduce CGA expenses in some cases.

- 1) Provide everyone with a list of voting members.
- 2) Streamline communication efforts.
- 3) Reduce expenses.

II. Correspondence List of Other Interested Parties - This list will include alternate members names as well as non-member companies.

- 1) This group will receive all written correspondence as do regular VCM members.
- 2) Provide everyone with the most complete information on a need-to-know basis.
- 3) Establish other contacts for regular members who for one reason or another may not be attending every meeting.
- 4) This group will not receive telegrams, Western Union messages, etc., that a regular member may have received.

Please correct any errors that have been made as this is the sixth revision (attached), and we are hopeful of finalizing this list for the use of CGA.

N-7

COMPARISON OF THE SAFETY ASPECTS OF LOADING AND UNLOADING PROCEDURES

This item will be continued on Docket as time did not permit us to discuss at this meeting.

N-8

STUDY OF PERSONNEL AND PROCESS MONITORING, INCLUDING MEANS OF INFORMATION RETRIEVAL

This item will be continued on Docket as time did not permit us to discuss at this meeting.

N-9

DEVELOPMENT OF A SAFETY SYMPOSIUM TO SUIT THE NEEDS OF BOTH MANUFACTURER AND USER

This item will be continued on Docket as time did not permit us to discuss at this meeting.

N-10

OTHER BUSINESS

VCM COMMITTEE MEMBERS

Mr. James Allen
Tenneco Chemical Company
Post Office Box 2
Turner Place
Pischataway, New Jersey 08854
(201) 981-5075

Mr. M. M. Anderson
Union Carbide Corporation
Chemicals & Plastics
Post Office Box 670
Bound Brook, New Jersey 08876
(212) 551-4472

Mr. J. M. Peterson
Borden Chemical Company
Division of Borden Incorporated
180 E. Broad Street
Columbus, Ohio 43215
(614) 225-4000

Mr. Robert C. Collins
Allied Chemical Corporation
Corporate Distribution
Post Office Box 1057R
Morristown, New Jersey 07960
(201) 455-2400

Mr. Roland Dunlop
Monsanto Company
800 North Lindbergh Boulevard
St. Louis, Missouri 63166

Mr. Charles S. Edmonds, Jr.
Diamond Shamrock Corporation
1100 Superior Avenue
Cleveland, Ohio 44114
(216) 694-5909

Mr. George E. Fitzgerald
ACF Industries, Inc.
Shippers Car Line Division
620 North Second Street
St. Charles, Missouri 63301
(314) 723-9600

Mr. J. R. Hopkins, Manager
Rail Transportation Equipment
U.S. Area Rail Fleet Administration
Dow Chemical USA
Post Office Box 1694
Midland, Michigan 48640
(517) 636-0496

Mr. Clovis C. Martin
Continental Oil Company
Five Greenway Plaza East
Houston, Texas 77046
(713) 627-4011 or 5178

Mr. R. E. Phillips
Ethyl Corporation
Ethyl Tower - 451 Florida
Baton Rouge, Louisiana 70801

Mr. E. A. Phillips
Union Tank Car Company
151st Street & Railroad Avenue
East Chicago, Indiana 46312

Mr. Edward G. Hansen
Section Manager - Equipment Div.
Transportation & Distribution Dept.
E. I. DuPont De Nemours & Co., Inc.
Wilmington, Delaware 19898
(302) 774-3047

Mr. G. J. Magyar
Supt. Equipment & Utilization
B. F. Goodrich Chemical Company
6100 Oak Tree Boulevard
Cleveland, Ohio 44131
(216) 524-0200

Mr. Clyde Meltzer
Transportation & Supplies
Traffic Department
Shell Oil Company
Post Office Box 2463
One Shell Plaza
Houston, Texas 77001
(713) 220-6435

Mr. R. E. Wilson
Manager, Equipment & Service
Transportation Department
Stauffer Chemical Company
Westport, Connecticut 06880
(203) 226-1511

Mr. A. E. Price
General American Transportation Corp.
Post Office Box 532
Sharon, Pennsylvania 15146
(216) 448-6801

Mr. R. A. Boerke
North American Car Corporation
222 South Riverside Plaza
Chicago, Illinois 60606
(312) 648-4000 (Company Phone)
(312) 648-4130 (Direct Line)

Mr. Joseph F. Knott
Director of Distribution
Industrial Chemical Division
PPG Industries, Inc.
One Gateway Center
Pittsburgh, Pa. 15222
(412) 434-2564

Mr. C. K. Dilley
Distribution Department
Industrial Chemical Division
PPG Industries, Inc.
One Gateway Center
Pittsburgh, Pa. 15222
(412) 434-3573

Mr. J. Portis
Midland Manufacturing Company
7733 Gross Point Road
Skokie, Illinois 60076
(312) 677-0333

Mr. L. H. Davenport, Superintendent
Technical Services, Engineering
Cominco Limited
Trail, British Columbia, CANADA
(604) 364-4202

Mr. H. T. Hale
Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63166

Mr. J. R. Little
Monochem, Incorporated
Post Office Box 488
Geismar, Louisiana 70734

Mr. Lee Parker
Hooker Chemical Company
(will advise at a later date)

CORRESPONDENCE LIST
OF OTHER INTERESTED PARTIES

Mr. Gene Evens
B. F. Goodrich Chemical Co.
Post Office Box 527
Calvert City, Kentucky 42029
(502) 395-4151

Mr. C. T. Graves
General American Transportation Co.
Post Office Box 532
Sharon, Pennsylvania 16146
(216) 448-6801

Mr. John F. Pinkman
Conoco Chemicals
Park 80, Plaza East
Saddlebrook, New Jersey 07662
(201) 845-3800 x395

Mr. T. C. Chastain
Assistant Mechanical Engineer
Missouri Pacific Railroad
210 North 13th Street
St. Louis, Missouri 63103
(314) 622-2944

Mr. W. R. Morley
Union Tank Car Company
111 West Jackson Boulevard
Chicago, Illinois 60604

Mr. J. Carleton
Union Tank Car Company
151st Street & Railroad Avenue
East Chicago, Indiana 46312

Mr. Dean Armstrong
Continental Oil Company
Five Greenway Plaza East
Houston, Texas 77046
(713) 627-5171

Draft

Suggested Plan of Action for Task Force

1. Update the Chemtrec Emergency Sheet.
2. Reconfirm the interest, of all shippers and/or procedures of VCM in the Mutual Aid Program.
3. Request each interested company to submit questions regarding company liability in the program, objectives, etc. to this Task Force.
4. The Task Force would collect the first round of questions and organize for CGA Legal Council review.
5. When all questions have been answered and formal approval received from participants a letter would be sent to the MCA requesting their approval to incorporate our program into the Chemtrec operation on a Mutual Aid basis.
6. If for some reason MCA does not allow us to establish this program into the Chemtrec operation a study of the CHLOREP program may be the alternate route in which we could aid one another.

Draft

SUBJECT: VCM Mutual Aid

Gentlemen:

The CGA - Ad Hoc Vinyl Chloride Committee wishes to solicit the support of all VCM shippers for this Mutual Aid Program.

It is hoped, by this committee there is still an interest in reestablishing and updating the attached (Exhibit I) Chemtrec - Emergency Reference Sheet for VCM. This can best be handled by advising this committee of any new information or changes on this list that you would like us to forward to John Zercher, Manager of Chemtrec, 1825 Connecticut Avenue, N.W., Washington, D.C. 20009.

In addition to the updating of this list (Exhibit I) indicate whether your company would participate in a Mutual Aid Program. A Task Force from this CGA Ad Hoc VCM Committee will assist all VCM producers and/or shippers in the organizing of a Mutual Aid Program. This program would allow participants to assist one another in handling emergency type situations through the notification efforts of Chemtrec. Naturally many questions must be answered prior to any Mutual Aid agreements. These questions will be answered by this Task Force and assisted by the CGA - Legal Council. Our present efforts require for you to indicate whether or not your company is interested in a program. If so, advise accordingly so that our Task Force can begin its work.

Chairman, Ad Hoc

Committee on VCM

1/17/75

SL 091260

Westport

Westport

R. E. Wilson

1/13/75

File

VCM Committee-Task Force on Liquid
Level Gauging Devices

P.E.Roggi

R.A.Asti - D.City (PVC)

P.Cupertino

R.J.Stimpfl

R.Langner - Long Beach

A meeting was held on January 7, 1975 at the offices of National Sonics Corporation in Farmingdale, Long Island. Those in attendance were:

C. Meltzer - Shell Chemical Company

W. Wulf - Shell Chemical Company

R. E. Wilson - Stauffer Chemical Company

J. Kristoffersen - National Sonics Corporation- Sales Manager

Bill Reis - " " " - Regional Sales Manager

N. Grigoraki - " " " - Tech Rep, Connecticut

R. McDaniel - " " " - Tech Rep, Houston

T. Twiss - " " " - Tech Rep, Houston

R. Sellers - " " " - Tech Rep, Houston

The purpose of the meeting was to formalize a design for a liquid level sensing device to be installed on two UTLX VCM tank cars leased to Stauffer Chemical Company and loaded by Shell Chemical Company at Norco, Louisiana. The second objective was to develop a test program and feasibility study for use of this type of gauging device on flammable compressed gas cars that must be loaded in a closed system.

OVERVIEW

Currently, the existing majority of VCM tank cars in service are equipped with the standard MGM slip tube gauging device. This device has several inherent problems that will negate its use in VCM service: 1.) The gauge releases vapor and/or liquid to the atmosphere when determining the liquid level during loading; 2.) the packing gland on the slip tube device has been a source of leakage from time to time.

Several chemical companies have committed themselves to the Midland magnetic float gauging device #B162 on new equipment. The type of replacement device on existing equipment, however, is being investigated in view of the high cost to remove a car from VCM service, install the device and purge the car before returning to VCM service

A task force to look at other types of gauging devices was established by the Vinyl Chloride Committee of the CGA. One of the devices currently used successfully in tank car service is an ultra-sonic gauge which requires minimal energy input, low maintenance and rugged construction.

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GENERAL CONSTRAINTS

In order to provide National Sonics with economic and physical controls in designing a device for a tank car, the following constraints were established during the January 7th meeting:

1. The sensor must mate with the present manway cover flange for the MGM gauge device.
2. The sensor control rod must be of a small enough diameter to pass through the existing hole on manway cover plate and into the protective pipe located inside the car for the MGM gauge device.
3. The visible part of the sensor located on the manway cover must be no larger than the MGM gauge cover.
4. The unit must be pressure tested to a minimum of 500 PSIG.
5. The energy level requirements must be low enough to assure that there will be no high voltage leakage nor sparking of any kind.
6. The experimental gauge must be able to detect four levels of liquid inside the car.
7. The gauge's design must withstand the standard impact and vibration established for tank cars.

DISCUSSION

There were several major problems requiring in-depth discussion during the meeting:

1. How many liquid level sensors can be established within the above constraints?
2. What is the economics in providing multi-point coaxial connectors for the electrical circuit?
3. How many contact points in the connector can be economically justified?
4. Can more than one connector be located on top of the car?
- 5/ In reviewing the proposed design on drawing D-2496, there is a question as to whether or not the liquid will enter into the sensing device tube at the same rate that the car is filling. There may be a need to provide additional vents at the top of the device located inside the car so that there is no lag between the tank's actual level and the level inside the read-out chamber.

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6. Four level sensing points were chosen. The lowest point would provide a warning that the car is reaching the allowable filling limits. The other three points would be the low, high and mid-range of the allowable filling level.

It is apparent that the maximum filling level of the 26M gallon VCM car is related directly to the allowable gross weight and not to the outage requirements of section 173.314 of the Federal Regulations. In view of this, it is necessary to first establish the density range for normal loading temperatures of VCM and relate this to the outage required to prevent exceeding the allowable gross weight.

For the test units, a spacing of 2" or approximately 380 gallons between each sensing device level was selected. This gallonage, based on an 8.2 lb. per gallon density, equates to a difference of 3,130 pounds approximately.

CONCLUSION

In view of the complexity and constraints on the design of the sensing device coupled with the need for standardizing among all industry representatives, the task force recommends that representatives of National Sonics be invited to the next VCM Committee meeting on January 21st to provide a brief presentation of the proposed test device and to participate in a discussion regarding industry standards and general requirements.

R. E. Wilson

/pc