

Monsanto

NAME & LOCATION: R. V. Butz - Texas City, Texas

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1970

DATE: March 5, 1970

cc.

SUBJECT: Safety & Property Protection Survey
November 10-14, 1969

PLAINTIFF'S
EXHIBIT
MON-54

REFERENCE

TO: Mr. G. L. Gorbell
St. Louis

We appreciate your survey of our plant and have prepared the following comments relative to those items referred to in your report of December 15.

We felt that 1969 was, in spite of the two major injuries, a very good safety year. In addition to winning the "Outstanding" rating in the Annual Plant Inspection and the President's Safety Award in the Monsanto Award Program, we had the lowest total and serious injury frequencies in our experience and sustained no single loss over \$100,000 for the first time in our recorded history.

Your confirmation of the knowledgeability of our department superintendents as to status of their safety objectives and programs confirms our feelings that our supervisors are seriously and effectively handling the safety portion of their job.

Our comments to your specific recommendations:

65-4 - Tank Car Unloading of Hexane

This recommendation has been offered before. This is the only highly flammable material that is bottom unloaded. We have looked at remote and fusible link control devices for use in conjunction with bottom unloading and have found that these are unacceptable because of the problems of connecting them to the car and working around this equipment. Since there are no facilities for unloading from the top of the car at this location, we have initiated an engineering study to determine the advantages and costs of top unloading of hexane tank cars.

63-3 - Flammable Liquid Loading

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You are proposing that on atmospheric flammable liquid tank cars, we should load through a Protectoseal cover. We find this untenable for several reasons.

1. Due to the inability to obtain proper size covers this would result in multiple procedures for handling the same product. A recent survey made by the Occupational Safety Committee of the Texas

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February 11, 1970

Chemical Council showed that no member of that Council that answered the query uses Protecto-seal (this includes duPont).

2. The inability to observe the liquid level during the topping-out operation increases the problems of transferring the car and creates flammable spill hazards. You referred us to the Queeny Plant as one who was using a dependable solid state probe. It is our understanding that this probe was used for approximately one year and its use has been discontinued.
3. Our Loss Prevention Department prefers an open hatch because in the event of a fire, the access and control of the emergency is easier and more direct.

69-1 - Machine and Equipment Guarding

The back-guarding of the equipment in the areas you noted has been corrected.

69-2 - Pilot Plant

We certainly agree that the Pilot Plant has been greatly improved from the housekeeping standpoint. The items you mentioned in your report have been corrected.

69-3 - Unsafe Practices

The specific unsafe practices which you mentioned were the subject of counseling and safety meetings shortly after your visit. We are very aware of the tremendous job that faces us in the near future of constructing new plants, starting up new plants, dismantling old plants and maintaining the close conformance to safety rules throughout these operations. You can be assured that our efforts will be greatly increased because we recognize the potential of these times.

69-4 - Laboratory Safety Objectives

The managers of Process Technology and Research are in the process of establishing safety objectives for 1970. Monthly injury frequency information is made available to both Process Technology and Research but is not broken down into the various work groups because of their small size.

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February 11, 1970

69-5 - Asbestos Exposure

The Loss Prevention Section is working with the Maintenance Department on this exposure. Improvements have been made to the dust evacuation system to minimize the hazard. The U. S. Bureau of Mines approved masks are provided for use by the personnel in this shop.

69-6 - Sulfuric Acid and Spent Acid Transferring

It was your recommendations that acid should be pumped rather than transferred by pressuring the car with air. In their brochures, acid manufacturers show pressuring of cars for unloading and a check of the local plants indicated that their experience with liquid pumps had been most unsatisfactory. Chocolate Bayou continues to have trouble with their pump and it is our understanding that they use air on the car to maintain suction to the pump for their operations. A check with Queeny and Krummrich indicated that certain types of pumps were used, all of them with some degree of difficulty, but we appreciate their listing for us the available pumps and their experience. Our present procedure provides pressure regulation of the air with remote operation of the air valves. Although we feel that the hazard is relatively small, especially when compared to the problems and hazards of maintaining acid pumps, we intend to study this further.

Again we appreciate your audit of our plant. Best personal regards.

RV Butz
R. V. Butz

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