

ASB



INDUSTRIES

Please provide Banks with written notice of action taken - with 30 days. The initials I wrote in are the individuals that you should be sure to see the comments for follow-up.

INTER-OFFICE CORRESPONDENCE thanks,

Date: December 3, 1979
From: Carl W. Banks
Location: General Office - 1 East

Subject: DOT Hazardous Material Audit

To: Mr. J. R. Farst

On October 29 and 30, I conducted a DOT hazardous material audit at the Lake Charles Plant. The following items were noted during this audit:

A. Shipping Papers

- ✓ 1. The DOT specification and test date of tank trucks being loaded are noted on the bill of lading by the loader. This is an excellent procedure and testifies to the fact that the loader is making this check. It could prevent PPG from improperly loading in non-DOT specification truck or one that is out of test. These are both DOT requirements for tank trucks.

- JCL → 2. Bills of lading for ethyl chloride are not all being signed before the truck is released. This seems to occur on the midnight shift. In conjunction with this, a full signature is required. Simply initialling the bill of lading is insufficient.

- ASB → 3. Bills of lading for shipments of mixed chemicals have, in some cases, an improper order entry for the chemicals. PPG uses the system of listing all DOT hazardous chemicals first followed by the non-hazardous chemicals. Bills of lading for shipments to the following customers were incorrect:

Thompson Hayward - 5
Industrial Chemical - 2
Moreland Chemical - 2

This type of error originates with the sales office and Order and Customer Service. However, the plant has the final responsibility to see that the bills of lading are correct. In this case, new bills of lading should have been issued.

- AGB → 4. All shipments of initiators from Lake Charles should be made under the Bureau of Explosives approval BA-258. Bills of lading should be corrected if they show otherwise. Several bills of lading for initiators had reference to DOT-E3187 which should not be used for Lake Charles shipments.

Good
PRO

Put drawing at each
loading station for loaders
on stenciling - only information
necessary to their

SL 085915

B. Tank Cars

- JCL* → 1. PPGX 3166 - a loaded caustic soda car - did not have a Transportation Safety Data Card attached to the bottom outlet.
- DCP* → 2. PPGX 2028 - DOT103A car that had test stenciling missing. Stenciling must be corrected. *3/77 BAR TANK TEST*
3/79 BRS COIL TEST
- DCP* → 3. PPGX 9055 - vinyl chloride card marked with "SP 4839." PPG has no DOT exemptions or special permits for VCM. This marking should be deleted on the car as well as other VCM cars that it may be on. *12/10 - CAR @ NATC SHOP - TWX'D ELZEY TO MAKE SURE NOT RESTENCILED*
- DCP* → 4. PPGX 6507 - VDCM - Stenciling of "Tested Date" (11/79) and "Due" (11/69) were incorrect and appeared to be backwards.

C. Tank Trucks

- EWC* → 1. Ethyl Chloride Truck 9025 was missing one placard. The retest of this trailer is due in November 1979.

D. Samples

- ✓ 1. Sample packaging was inspected and found to be in good control.
2. The UPS Red Book (PPG's shipping document) contained a number of errors that can be described as follows:
- a. Improper shipping names - Only those found in 49CFR172.101 are authorized.
 - b. Abbreviations in shipping names and hazard classes are not allowed.
 - c. The hazard class IRRITANT should not be used to describe any materials that PPG ships. IRRITANT labels must not be applied to the outside of packages.
 - d. PPG solvents are not classified as a hazardous material by the DOT unless shipped by air. Since UPS does not ship any hazardous material by air, solvent shipments must not be classified as hazardous and entered in the UPS Red Book.

ASB (?)

*Probs
Process
not products*

E. Miscellaneous

- PRA* → 1. The Lake Charles 24-hour emergency response location (guard house) is not using the same emergency response reporting form as the Natrium Emergency Response Center. This could lead to the incomplete transfer of information or errors in the transfer. I am attaching the Natrium Emergency Response Center form to this letter. I would like consideration given to the adoption of this form at Lake Charles.

I don't have any problem with this. Let's change.

7/6/79

SL 085916

2. Coast Guard regulations require the posting of a Cargo Information Card near the warning center on barges of hazardous materials. The caustic barges that I inspected used PPG Transportation Safety Data Cards instead of a Cargo Information Card. I will investigate the legality of this substitution. In the meantime, I would suggest using the Cargo Information Card as required by the regulations.

F. Bureau of Explosives Audit

Attached to this letter is the Bureau of Explosives audit performed at Lake Charles on 10/23/79. The audit report is very complimentary of Lake Charles' hazardous material shipping performance. The one item standing out that requires correcting is stenciling on tank cars. The report specifies six different cars that either were improperly overstenciled or lacked proper stenciling. Loading personnel should inspect the car stencil to ensure that it is correct before a car is shipped. Are they?

My overall assessment of the audit is that Lake Charles is doing a good job in complying with DOT hazardous material regulations. However, because of the great number of shipments that Lake Charles makes, there is a chance for error to occur. This is borne out by the number of items that I have included in the report. If you have any questions concerning this audit or the shipment of hazardous materials in general, please call on me for assistance. I would like to receive written notice within 30 days that the necessary action, where required, has been taken on the above items. This includes the Bureau of Explosives audit also.

Carl W Banks

Carl W. Banks
Senior Distribution Engineer

CWB:rb

Attachment

cc: A. J. Beatrice
R. E. Bowles
L. S. Bryant
J. P. Ham
H. D. Hank
I. O. Klimas
R. E. Sourwine

SL 085917