

ATTACHMENT 5



INDUSTRIES

PPG INDUSTRIES, INC. CHEMICAL DIVISION - U.S. P. O. BOX 1000 LAKE CHARLES, LA. 70602

August 30, 1982

Mr. Dick Whittington
Administrator
U.S. EPA, Region VI
1201 Elm Street
Dallas, Texas 75270

Dear Mr. Whittington:

In compliance with the provisions of 61.65(a) of the NESHAP vinyl chloride regulations, enclosed are two reports of safety relief valve discharges which occurred on August 24, 1982.

Sincerely,

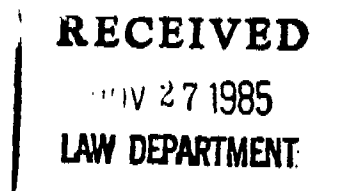
PPG INDUSTRIES, INC.

Philip S. Trew
Environmental Control Specialist

PST/cp

CC: Mr. Gus Von Bodungen
Mr. Joe Withers

bcc: R. P. Byars/J. A. Hart
B. D. Reynolds
F. C. Dehn/R. J. Samelson
W. J. Peard/J. E. Wyche
E. J. Tullier
File #103.1.02



SL 068498

RELIEF VALVE DISCHARGE REPORT

VCM PLANT

(Send completed form to Coordinator Environmental Systems within 5 days of discharge.)

1. Date of Discharge: August 24, 1982
2. Time of Discharge: 11:00 A.M. to 11:30 A.M.
3. Source: SRV #46-2459, Location #90-259 -- Certain-Teed Tank Fill Line
(Name of Vessel and SRV Number)
4. Nature and Cause of Discharge: This SRV release was due to the Certain-Teed
Tank Fill Line being blocked-in without the pressure equalization line being
in service.
5. Approximate Quantity of VCM Discharged: 303 lbs.
6. Method of Calculation of Line (5): See Attachment
7. Action Taken to Prevent This Discharge: When the release was discovered at
11:30 A.M. the alternate SRV was placed into service.
8. Measures Adopted to Prevent Future Discharges: Five measures have been adopted
to insure against the reoccurrence of this SRV from discharging:
1) On 8/24/82, the VCM-II Storage/Transfer Operator received written
instructions to leave all equalizing lines open.
2) On 8/24/82, a tag was placed on the equalization line stating that the line
must remain open.

- 4) On 8/25/82, the SOP was revised to state that equalization lines must remain open.
- 5) By 9/3/82, a sign will be posted in the vicinity of the equalization line reminding the operators to leave the equalization lines open.

SRV Release Of 8/24/82 at 11:00 A.M.

Method Of Calculation

1. Estimate of pounds of vinyl released

1. 30 feet of 10" pipe 1/3 full of vinyl
2. 36 feet of 2" pipe full of vinyl
3. Total Volume:

$$A) \frac{\pi L D^2}{4} = \frac{\pi (30) (.833)^2}{4} = 16.36 \text{ ft}^3 \text{ of the 10" pipe}$$

$$1/3 \text{ of the 10" pipe filled so } V = (0.252315) (16.36) = 4.13 \text{ ft}^3$$

$$B) \frac{\pi L D^2}{4} = \frac{\pi (36) (0.172)^2}{4} = 0.8365 \text{ ft}^3$$

$$C) \text{ Total Volume of VCM released} = 4.97 \text{ ft}^3$$

4. Assume VCM liquid at 4°F and atmospheric pressure
5. Density = 8.1584 lb/gal
6. lbs. released = $(4.97 \text{ ft}^3) \left(7.48052 \frac{\text{gal}}{\text{ft}^3} \right) \left(8.1584 \frac{\text{lb}}{\text{gal}} \right) = 303 \text{ lbs.}$

RELIEF VALVE DISCHARGE REPORT

VCM PLANT

(Send completed form to Coordinator Environmental Systems within 5 days of discharge.)

1. Date of Discharge: August 24, 1982
2. Time of Discharge: 5:15 P.M.
3. Source: SRV #46-2464, Location 90-260 -- Certain-Teed Tank Fill Line
(Name of Vessel and SRV Number)
4. Nature and Cause of Discharge: This SRV release was due to the rupture
disc having a pin hole leak and the SRV leaking. The transfer line was
operating at only 110-120 psi with the RD/SRV rated for 275 psi.
5. Approximate Quantity of VCM Discharged: 51 lbs.
6. Method of Calculation of Line (5): See Attachment
7. Action Taken to Prevent This Discharge: Maintenance personnel immediately
changed out the rupture disc between the transfer line and the SRV
which stopped the release.
8. Measures Adopted to Prevent Future Discharges: The SRV was removed
from service and tested with no noticeable problems observed. The SRV
qualified test mechanic assumes that the SRV seat had been fouled which
prevented the SRV from seating properly.

SRV Release of 8/24/82 at 5:15 P.M.

Method Of Calculation

1. 36 feet of 2" pipe full of liquid vinyl
2. Total Volume = 0.8360 ft³

$$V = \frac{\pi LD^2}{4} = \frac{\pi (36)(0.172)^2}{4} = 0.8360 \text{ ft}^3$$

3. Assume VCM at 4°F and atmospheric pressure
4. Density = 8.1584 lb/gal
5. lb. VCM =

$$= (0.8364 \text{ ft}^3)(7.48052 \text{ gal/ft}^3)(8.1584 \text{ lb/gal}) = 51 \text{ lb.}$$