

SP-20

Log R-466B

NATIONAL TRANSPORTATION SAFETY BOARD
WASHINGTON, D.C.

ISSUED: June 17, 1985

Forwarded to:

Honorable Thorne G. Auchter
Assistant Secretary
Occupational Safety and Health
Administration
U.S. Department of Labor
Washington, D.C. 20210

SAFETY RECOMMENDATION(S)

R-85-71 and -72

At 3:45 a.m., on July 30, 1983, vinyl chloride monomer (VCM) 1/ under pressure escaped from a railroad tank car at the loading facility within the Formosa Plastics Corporation (Formosa) chemical manufacturing plant at Baton Rouge, Louisiana. The released VCM was ignited by an undetermined source, and a large billowing fire ensued. An adjacent tank car containing VCM was involved in the fire but did not rupture violently. Two persons were injured seriously, two tank cars were destroyed, three tank cars were damaged moderately, and the loading facility was damaged extensively. Damage was estimated to be \$1 million. 2/

The conduit which carried the electrical lines along the loading rack was designed to prevent electrical sparking from reaching an explosive gaseous atmosphere and was termed "explosion proof;" however, investigators found that some conduit coverplates under the racks were missing, which exposed the wiring and negated the explosion-proof feature of the installation. The speaker assembly on the intercom system at the loading rack was neither designed nor protected to prevent electrical sparking in an explosive, gaseous atmosphere. A grounding cable at the track level was rusted through and did not provide grounding protection. The flashlights used by the loaders were not approved for use in a VCM handling area. Although the radios used by the loaders were authorized for use in hazardous locations, the batteries being used in the radios were not because they supplied an amount of current that exceeded the level of current that precludes thermal or electrical ignition of flammable gas in an explosive atmosphere. The hand tools used by the loaders were of a ferrous material and could produce sparking in contact with other metals.

1/ Classified by the U.S. Department of Transportation as a flammable compressed gas, VCM is ignited easily in either liquid or vapor form, producing hazardous combustible gases largely composed of hydrogen chloride and carbon monoxide. It also is classified as carcinogenic.

2/ For more detailed information read Railroad Accident Report--"Vinyl Chloride Monomer Release from a Railroad Tank Car and Fire, Formosa Plastics Corporation Plant, Baton Rouge, Louisiana, July 30, 1983" (NTSB/RAR-85/08).

The quick-connect coupler from the end of the liquid loading hose at station No. 6-2 was examined after the accident, and investigators found that one of the two cam arms was broken and missing from the shank. This connection, with the cam lock fitting with the broken cam arm, had been made when the hoses were attached to the tank car by the previous shift sometime before 6 p.m. on July 29, 1983. Examination of the fracture area revealed that there was a series of parallel gouges made by pliers on the face of the fracture and on the sides of the shank. The face of the fracture and the gouges were covered with the same degree of oxidation/corrosion as the other areas of the coupler.

A Louisiana State Police hazardous materials unit spokesman said that a State statute authorizes the State Police to enter and inspect any facility handling hazardous materials. Because of limited manpower and their highway-oriented operation, however, the State Police inspect only vehicles on the highway or highway vehicles at loading racks and terminals. The spokesman said that the State Police recently had sent two officers to school for training in the inspection of railroad cars. The Louisiana State Fire Marshal's office advised investigators that, although the fire marshal had the jurisdiction to inspect loading facilities, the office lacked the resources, manpower, and expertise to inspect such facilities in a petrochemical plant. The fire marshal's office had no record that it had made any inspections at the Formosa plant.

The U.S. Department of Labor, Occupational Safety and Health Administration (OSHA) has regulatory authority and jurisdiction to inspect the Formosa plant facilities. ^{3/} OSHA had made inspections of the plant as follows:

October 10, 1973	General Schedule Inspection
November 27, 1973	Follow-up Inspection
February 21, 1974	Inspection Following an Accident
May 16, 1974	General Schedule Inspection
Unknown, 1975	General Schedule Inspection
December 10, 1976	General Schedule Inspection

Since 1976, OSHA has established priorities to perform general schedule inspections, and Formosa was not scheduled by OSHA for a general schedule inspection. Currently, OSHA is making unscheduled inspections only as the result of an employee complaint or a catastrophic accident.

Formosa has rebuilt the tank car loading rack between track Nos. 5 and 6. OSHA has not inspected the plant since the accident and has not examined the rebuilt rack. OSHA reviewed injury and illness reports for the Formosa plant on January 31, 1985. Because the injury/illness rate was lower than the national average, no inspection of the facilities was conducted or scheduled.

The Transportation Safety Act of 1974, Public Law 93-633, 88 Stat. 2156, Title I-Hazardous Materials, Section 102, states, "It is declared to be the policy of Congress in this title to improve the regulatory and enforcement authority of the Secretary of Transportation to protect the nation adequately against the risks to life and property which are inherent in the transportation of hazardous materials in commerce." The U.S. Department of Transportation's area of responsibility is further clarified in Section 103(6): "Transport or transportation means any movement of property by any

^{3/} An OSHA inspector typically inspects such things as electrical lines, tools, and equipment and sometimes arrives at a facility unannounced.

mode, and any loading, unloading, or storage incidental thereto." The Federal Railroad Administration (FRA) has a hazardous materials inspector in New Orleans, Louisiana, 85 miles from Baton Rouge, but the railroad loading facility at the Formosa plant was last inspected by an FRA inspector in 1977 following a material handling accident.

OSHA and the FRA do not have an agreement of understanding for the safety inspections of railroad tank car loading and unloading facilities. OSHA has regulations for railroad tank car loading/unloading facilities, but the FRA does not.

The Coast Guard inspects the marine loading facility at the Formosa plant annually. The Coast Guard and OSHA have a working agreement, and both agencies have cooperated in the inspection of hazardous materials stored on docks and in the investigation of accidents and incidents on vessels involving hazardous materials.

The Formosa safety inspection program not only did not detect the generally unsafe working conditions that existed at the rail car loading racks but also did not result in the detection of defective loading equipment. Since safety inspections were not performed by Federal or State agencies, the fact that safety was not being addressed in an appropriate manner by Formosa went undetected.

The safety of petrochemical plant operations is only as good as each individual plant's safety program. While large-scale accidents may occur infrequently, they can cause large amounts of property damage, injuries, and social disruption. Toxic and/or flammable concentrations of chemicals can impact population exposures surrounding a petrochemical plant within minutes of the initial release.^{4/} The potential for catastrophic accidents in an area such as Baton Rouge and surrounding communities with their extremely dense concentration of petrochemical plants is extremely high. If a BLEVE (a Boiling Liquid Expanding Vapor Explosion) had occurred in the accident, the explosion could have resulted in a chain-reaction of explosions throughout the Formosa plant and affected adjacent plants, escalating the accident to a catastrophe. Effective safety oversight is critical, and Federal and State agencies that have the responsibility and the authority to enforce safety standards in petrochemical plants should reevaluate their priorities in scheduling inspections and training inspectors to insure that a high level of safety is maintained at these chemical plants. The Safety Board believes that insufficient Federal and State oversight contributed to the lack of safety procedures, inadequate training of personnel, and poor maintenance of loading rack equipment at the Formosa plant.

Therefore, the National Transportation Safety Board recommends that the Occupational Safety and Health Administration:

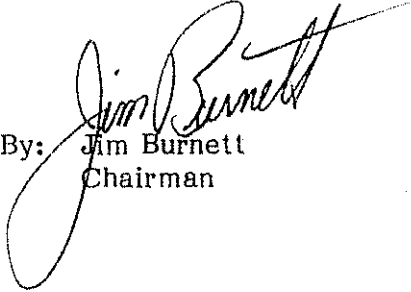
Evaluate its ability to conduct inspections of petrochemical plant loading facilities and its method of establishing inspection priorities for general schedule inspections, and make necessary changes to provide for regular inspections. (Class II, Priority Action) (R-85-71)

^{4/} The Safety Board discussed the issue of emergency preparedness plans for fixed-site hazardous materials handling facilities in its Special Investigation Report—"Railroad Yard Safety: Hazardous Materials and Emergency Preparedness" (NTSB/SIR-85/02).

Develop a memorandum of understanding with the Federal Railroad Administration to define the extent of each agency's responsibility for safety inspections of hazardous materials loading/unloading facilities at petrochemical plants to eliminate gaps or overlaps in responsibility. (Class II, Priority Action) (R-85-72)

The National Transportation Safety Board is an independent Federal agency with the statutory responsibility ". . . to promote transportation safety by conducting independent accident investigations and by formulating safety improvement recommendations" (Public Law 93-633). The Safety Board is vitally interested in any action taken as a result of its safety recommendations. Therefore, it would appreciate a response from you regarding action taken or contemplated with respect to the recommendations in this letter.

BURNETT, Chairman, GOLDMAN, Vice Chairman, and BURSLEY, Member, concurred in these recommendations.

By: 
Jim Burnett
Chairman