

JUL 26 1991

Mr. J. Patrick Batchelor
Commissioner and Assistant Secretary
Department of Natural Resources
State of Louisiana
P.O. Box 94275
Baton Rouge, Louisiana 70804-9275

Dear Mr. Batchelor:

Your letter of June 20, 1991, describes your approval of an application by PPG Industries, Inc. (PPG) for a waiver of the requirement of 49 CFR 192.179(c) that pressure relief discharge be located so that the gas can be blown to the atmosphere without hazard. The application covers a three mile section of line to transport chlorine gas between the PPG Industries, Inc. plant and the KRONOS Louisiana, Inc. plant, all located in Calcasieu Parish, Louisiana.

Since the public would be exposed to the toxic effect of chlorine gases, these gases cannot be vented to the atmosphere without hazard. Accordingly, PPG seeks waiver of this 49 CFR 192.179(c) requirement, and proposes to build a completely contained relief system. Rather than vent to the atmosphere, PPG would return the gas to its plant for liquefaction or neutralization.

Based on the facts presented in your letter and the conditions stipulated in the waiver, we conclude the waiver is not inconsistent with pipeline safety. For this reason and because Louisiana has met the applicable provisions of the Natural Gas Pipeline Safety Act of 1968 in granting the waiver, we offer no objection to the waiver.

Sincerely,

Original Sign By

George W. Tenley, Jr.
Associate Administrator
for Pipeline Safety

cc:

DPS-1/2/10/11/20/27/33; DCC-1
DPS-11:JWillock:rak:366-1640:7/23/91

FILE: Louisiana State Waiver File



BUDDY ROEMER
GOVERNOR

RON GOMEZ
SECRETARY

J. PATRICK BATCHELOR
COMMISSIONER AND
ASSISTANT SECRETARY

DEPARTMENT OF NATURAL RESOURCES

June 20, 1991

VIA CERTIFIED MAIL RECEIPT NO. 48843

RECEIVED
OPS-1
91 JUN 25 PM 4:45

Mr. George W. Tenley, Jr.
Associate Administrator for Pipeline Safety
400 7th Street, S.W., Room 8417
Washington, DC 20590

RE: Notice of Application of PPG Industries, Inc.
for Waiver of DOT Pipeline Safety Regulations
Section 192.179(c) relative to pressure relief
devices.

Dear Mr. Tenley:

PPG Industries, Inc. has made application to the Louisiana Office of Conservation, Pipeline Division, for waiver of the requirements of DOT Pipeline Safety Regulations Section 192.179(c), and the State of Louisiana's equivalent thereof, for said applicant's proposed chlorine gas pipeline to be constructed in Calcasieu Parish Louisiana. This application was filed under the Louisiana Department of Natural Resources, Office of Conservation, Pipeline Division Docket No. PL 91-058, which was duly noticed and a public hearing held on May 16, 1991. The applicant seeks waiver of the requirements for pressure relief devices on its proposed chlorine gas pipeline.

This Notice of Waiver is directed to you pursuant to your policy concerning this state's responsibility in granting DOT Regulation waivers. In this connection we submit to you the following:

1. Application: PPG Industries, Inc.
P. O. Box 1000
Lake Charles, Louisiana 70602
Attention: Charles Spelbrink
Senior Project Engineer
Telephone: (318) 491-4873
2. Applicant request waiver of Section 192.179(c), Title 49, Code of Federal Regulations, relative to the requirements

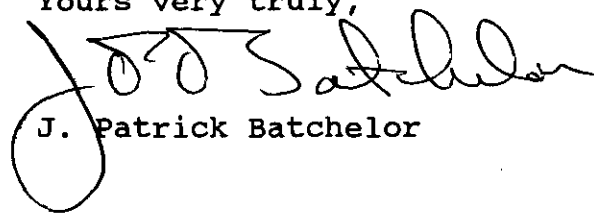
Mr. George W. Tenley, Jr.
June 20, 1991
Page 2

for installation and maintenance of pressure relief devices for a proposed chlorine gas line to be constructed in Calcasieu Parish, Louisiana between the plant of applicant and the plant of KRONOS Louisiana, Inc.

3. The pipeline facility for which waiver is sought will be used for the transportation of vaporized chlorine between the plant of applicant and the plant of KRONOS Louisiana, Inc. all in Calcasieu Parish, Louisiana. The line will be approximately 3 miles in length, will conform to the requirements for Class 3 location, will have a maximum operating pressure of 150 PSIG and a normal operating pressure of 80-105 PSIG. The blowdown procedure of the applicant will provide for return of the chlorine gas to the point of origin for liquefaction or neutralization. The blowdown procedure is outlined in the application of PPG Industries, Inc. which is attached hereto.
4. The Pipeline Division of the Office of Conservation believes that granting of the proposed waiver is justified as being in the public interest to prevent the venting to atmosphere of highly toxic chlorine gases. The proposed blowdown system offered in lieu of relief to the atmosphere is consistent with the intended safety precautions of the regulations.
5. We attach hereto an Order of the Office of Conservation granting the requested waiver, said waiver to be effective on August 21, 1991, unless the DOT exercises its option to suspend the effect of this Order by appropriate notice.

Your prompt consideration of this proposed waiver will be greatly appreciated.

Yours very truly,



J. Patrick Batchelor

JPB:EL:pja

Attachment (as stated)

STATE OF LOUISIANA
OFFICE OF CONSERVATION
PIPELINE DIVISION

PL ORDER NO. 3417

AN ORDER GRANTING THE APPLICATION OF PPG INDUSTRIES, INC.
FOR WAIVER OF PART 192.179(c) OF TITLE 49, CODE OF FEDERAL
REGULATIONS AND FOR WAIVER OF THE REQUIREMENTS OF LOUISIANA
ADMINISTRATIVE CODE, TITLE 43 PART XIII, SECTION 1141(C)

Pursuant to authority delegated under the laws of the State of Louisiana, particularly Chapter 7 of Title 30 of the Louisiana Revised Statutes of 1950, entitled the Natural Resources and Energy Act of 1973 (La. R.S. 30:501 et seq) and the Rules and Regulations adopted pursuant thereto, and after public hearing held under docket number PL91-058, upon the application of PPG Industries, Inc. following legal publication of notice of such hearing, an opportunity to be heard and to make comment having been afforded to the public and all interested parties, the following Order is hereby issued and promulgated by the Commissioner of Conservation as being reasonably necessary to protect the public interest and to carry out the provisions of the laws of this state.

FINDINGS

THE COMMISSIONER OF CONSERVATION FINDS AS FOLLOWS:

1. The applicant, PPG Industries, Inc., proposes to construct approximately three miles of line in Calcasieu Parish, Louisiana, from its plant to the plant of KRONOS, Louisiana, Inc. in Calcasieu Parish, Louisiana, for the purpose of vaporizing dry chlorine gas and transmitting same to KRONOS, Louisiana, Inc. through said pipeline by way of skin effect current traced piping

5. Chlorine gas is extremely toxic and venting of said gas to the atmosphere is inconsistent with pipeline safety theory.

6. The proposed deviation from pipeline safety regulations relative to the venting of said gases to atmosphere is consistent with pipeline safety and is justified.

7. That based upon the evidence presented at the hearing the proposed deviation from pipeline safety regulations is in the public interest.

ORDER

NOW, THEREFORE, IT IS ORDERED THAT:

1. The application of PPG Industries, Inc. for deviation from Part 192.179(c) of Title 49, Code of Federal Regulations, and for deviation from Louisiana Administrative Code, Title 43, Part XIII, Section 1141(C) is hereby granted and the applicant is hereby authorized to substitute therefor the alternate proposed blowdown procedure for the KRONOS chlorine pipeline.

2. This Order shall become effective on or after August 21, 1991.

OFFICE OF CONSERVATION
PIPELINE DIVISION

BATON ROUGE, LOUISIANA, this
20th day of June, 1991.



J. PATRICK BATCHELOR
COMMISSIONER OF CONSERVATION

ATTACHMENT 1**KRONOS CHLORINE PIPELINE
BLOWDOWN PROCEDURE**

Due to the potential health hazards associated with exposure to chlorine gas, the KRONOS pipeline will not have any atmospheric blowdown valves. Instead, a system is being provided within the boundaries of PPG's plant to blowdown the pipeline in a contained and controlled manner where chlorine is not released to the atmosphere. In this contained system, the pipeline will be blown down through a 3 inch carbon steel line which routes the chlorine gas to the plant's chlorine liquefaction facility. The chlorine gas depending on the pipeline pressure will be either routed to a sulphur-chloride absorption system operating at 30 psig which absorbs and recovers the chlorine gas or routed to a caustic neutralizing system operating at atmospheric pressure where the chlorine reacts to form a salt solution.

The emergency blowdown procedure described below is designed to minimize the time to blowdown the pipeline from an initial block-in pressure to atmospheric pressure. An emergency shutdown is initiated by a push-button in the control panel which houses the pipeline operator interface automatic control and monitoring facilities. This panel is located in the existing VCM II control room. The chlorine vapor generator supplying gas to the pipeline and the inlet end of the pipeline are located in the VCM II plant. Once the emergency pushbutton is depressed, automatically actuated valves located on both ends of the pipeline will close isolating the pipeline from the source of chlorine gas and stopping flow to the KRONOS plant at the discharge of the pipeline. Closure of these valves will be signaled in the control room via valve limit switches.

Once the pipeline has been confirmed to be blocked-in, a VCM II area operator will manually open a 3 inch valve in the blowdown line going to the liquefaction plant. The VCM II area operator will notify the liquefaction operating personnel that the pipeline is ready to be blown down.

The liquefaction operator will initially open a manual valve off the 3 inch blowdown line to route chlorine gas to the 30 psig sulphur chloride system via an 8 inch blowdown header. When the pressure in the KRONOS pipeline drops to 65-75 psig, the operator will stop flow to the sulphur chloride system and open a valve in the 8 inch header to send blown down gas to the chlorine neutralizing system. When the pipeline pressure is reduced to approximately 5 psig, the operator will stop flow directly to neutralization and open a 2 inch valve off the 3 inch blowdown header to route the blown down gas to the suction of a liquid ring

BLOWDOWN PROCEDURE**Page 2**

vacuum compressor. The compressor which can discharge either to sulphur chloride or neutralization will then take the pipeline down to atmospheric pressure.

Using the above procedure, the chlorine pipeline can be blown down from its maximum initial shut-in pressure (approximately 90 psig) to atmospheric pressure in approximately 1 hour and 45 minutes. The pipeline pressure will be reduced to 5 psig in approximately 1 hour.

LEGAL NOTICE

STATE OF LOUISIANA
OFFICE OF CONSERVATION
BATON ROUGE, LOUISIANA

DOCKET NO. PL 91-058

In accordance with the laws of the State of Louisiana, and with reference to the provisions of Title 30 of the Louisiana Revised Statutes of 1950, as amended by Act 16 of the Extraordinary Session of 1973, being Chapter 7 of Title 30, and particularly Regulation 9, Section 104.1 of said Act, a public hearing will be held in the Conservation Auditorium, First Floor, State Land and Natural Resources Building, 625 North 4th Street, Baton Rouge, Louisiana, at 9:00 a.m. on May 16, 1991, upon the application of PPG INDUSTRIES, INC.

At such hearing the Commissioner will consider evidence relative to the issuance of any order granting PPG INDUSTRIES, INC. a waiver of certain Pipeline Safety requirements or permission to deviate from Pipeline Safety Regulations, in the Parish of Calcasieu, State of Louisiana, pursuant particularly but not exclusively to Louisiana Safety Standards for the Transportation of Natural and Other Gas By Pipeline, Part 192.179(C).

A copy of the application is on file with the Office of Conservation and may be examined during normal business hours.

Comments and views regarding the application should be directed in written form to be received not later than 5:00 p.m., May 15, 1991. Oral comments will be received at the hearing but should be brief and not cover the entire matters contained in the written comments. Direct comments to:

J. PATRICK BATCHELOR
Commissioner of Conservation
Post Office Box 94275
Baton Rouge, Louisiana 70804-9275
RE: Docket No. PL 91-058

All parties having interest in the aforesaid shall take notice thereof.

BY ORDER OF:

J. PATRICK BATCHELOR
Commissioner of Conservation
Baton Rouge, Louisiana

JPB/JEK/pja