KGT

INTERNAL CORRESPONDENCE

UNION CARBIDE CORPORATION

P. O. BOX 3370, BROWNSVILLE, TEXAS 78520

COATINGS MATERIALS DIVISION

PLAINTIFF'S EXHIBIT
UC-1973

To (Name) H. D. Unland (3)
Company
Location Brownsville Plant

Date August 20, 1982
Originating Dept.
Answering letter date
Subject Safety and Health Inspection of 529 Area

Copy to Plant Safety Inspection Team Members
Plant Safety Committee Members
OSHA Coordinators
A. L. Barefoot
S. J. Footer
R. C. Glock
W. W. McManus
Shift Coordinators (5)
Shift Supervisors (10)
K. A. Windhorst

At your request the Plant Safety and Health Inspection Team inspected the 529 area. The Team members performing the inspection were: A. B. Zarate, Instrument Mechanic; C. A. Swanson, Electrician; D. Porter, Rigger; Roy Garcia, Machinist; N. Bowling, Pipefitter; M. J. Suarez, Engineering; and R. Medrano, Operations. Some of the items that are listed in this inspection may already be covered by work orders, and some of the items may not seem to be safety or health related, but were considered worthy of mention by the Team members. The inspection notes of the Team members are as follows:

529 UNIT - GROUND LEVEL

1. The AUTHORIZED PERSONS ONLY sign on the E. door of the N. switchroom has fallen off.

2. The HEARING PROTECTION REQUIRED sign on the W. side of the N. switchroom is placed too high; it is hard to see.

3. There are numerous chains hanging from chain valves which are hard to see and present a head knock hazard.

4. MEK-DC solvent line from bottom of GSC kettle is taped with hazard black and white tape - needs retaping, tripping hazard.

5. Ladders at S. end of unit are stored on the ground about 10' away from their ladder rack.

6. About 10' of 3/4" tubing is hanging between #1 TC calandrias.

7. Insulation has fallen off on steam to MEKDC calandria.

BRE 0144

529 UNIT - GROUND LEVEL (Cont'd)

8. Insulation is also needed on GSC kettle line.
9. Leaking valve and bushing on MEKRC tails pump.
10. Insulation needs attention on GSC tails kettle circulating pump.
11. 1" pipe to loop seal by #3 EAPC reflux pump needs brace.
12. Service water line from tank to pump suction is leaking.
13. Leaking valve on sample tap off #3 EAPC past make.
14. Fire extinguisher #410 N. of "A" condensate tank has a seal but no tie wrap around the hose.
15. SW of instrument air dryers there is 1/2" copper tubing leak coming off #2 TC tails DMV.
16. The following pumps - the drip pans are not hooked up to a floor drain and instead drain into the pad: #1 CC reflux pump and the EARC reflux pumps, N. & S. BRC bottoms pumps, #1 TC reflux pumps, N. & S. EADC reflux pumps, N. & S. MEKDC reflux pumps, N. & S. MEKDC bottoms pumps, N. & S. EARC bottoms pumps, #3 EAPC tails pumps.
17. There is a pipe leak on the vent header seal tank drain line.
18. N. 529 Autocall box is not painted red.
19. Conduit leaving the above box also not painted red.
20. N. of the N. switchroom there is an unused 1" pipe.
21. Unused large and small electrical cables at N. switchroom.
22. Trash on floor in N. switchroom.
23. Unused conduit and exposed wires in the W. end of the center switchrack and N. switchroom.
24. Choker hanging above lighting panel A-2.
25. There is an open 3/4" T condulet at the N. BRC bottoms pump motor.
26. Unused support on BRC tails cooler, head knock hazard.
27. Unlabeled switch handle missing on beam near Panel A-14.
28. There are several 110V outlets throughout the unit which are beyond safe use.
29. Trash in the S. switchroom.

BRE 0145

529 UNIT - GROUND LEVEL (Cont'd)

30. Flanges, slipblinds and gaskets are not properly stored on the N. side of the unit.

31. Insulation is coming off from the suction line of #1 CC reflux pumps.

32. N. EARC tails pump pad is dirty with oil draining from oil mist drain.

33. N. & S. past make ANRC pumps drip pans are collecting leaking product and rusting the pump base.

34. Center Kinney strainer drive motor gear box is leaking gear oil.

35. Some dirt, sand and broken cement pieces are standing on E. side working back onto the unit floor. They could plug the pad drains.

36. Drain cover is rusted out at foot of #2 CC surge tank.

37. Some scaffolding has been erected that apparently is not being used.

38. N. & S. #3 EAPC tails pumps are running hot due to too much oil in bearing housing.

39. Hoses on ground S. of air dryers tripping hazard.

529 UNIT - 2nd LEVEL

1. Air hose laying along walkway by #2 CC not being used - tripping hazard.

2. The insulation has come off the ARC line, also wires hanging from the line at the elbow.

3. Gaskets, nuts and bolts and tubing scattered all around MEKDC column.

4. #2 AARC make DMV station needs support on N. end. It is resting on drain valve and the nipple is bent.

5. Conduit is falling apart W. of ANRC reflux tank.

6. Cooling water off of header on 3rd level going to 2nd level by MEKRC column is vibrating excessively. The hangers are loose.

7. Seawater valve leaking off of main header N. of BRC.

8. Open wire troughs and condulet fittings S. of old control room.

9. Open condulet fitting above ASC reflux DMV.

10. Open tees on W. wall of old control room.

11. Two 3/4" conduits need caps at the old control room.

12. Lighting conduit needs bracing below 3rd level S. of #2 CC.

13. Since steam traps are not insulated, some may require a wire guard to prevent someone from being burned.

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529 UNIT - 2nd LEVEL

14. MEK leaking from valve W. of MEKRC.

15. There are gaskets and flanges left over from an old job around the MEKDC column.

16. A full 5-pint bottle of glacial acid and two empty unlabeled gallon jugs are in the old control room.

17. Old control room at S. end of 529 is built and covered with asbestos some of which is coming off and blowing away.

18. There is a piece of channel iron about 14' high by the ANRC reflux tank which is rusted out and about to fall on someone.

19. #2 CC reflux tank overflow pipe has a badly corroded hanger on last elbow to drain line.

20. There is no lead seal on extinguisher #176.

21. There is an improper hearing protection sign by BRC DMVs.

22. Step ladder by ANRC not being used.

23. Unused steel flex hose connected next to ANRC and lying on ground - tripping hazard.

24. Slipblinds, flanges and other fittings improperly stored on NW corner of the unit.

529 UNIT - 3rd LEVEL

1. Plywood, brooms, paper and other debris by N. handrail.

2. Water hose laying on ground not being used - tripping hazard, center of structure next to safety shower.

3. Deck grating E. of MEKRC is very loose.

4. EARC solvent cooler E. head is leaking.

5. E. of #1 TC there is a piece of grating which is 1-1/4" high while the rest of the grating is 1" - tripping hazard.

6. The EARC solvent cooler is not sitting properly in the saddle supports.

7. EADC has no PRV in process side of cooler.

8. #2 AARC past make cooler - the top one has no PRV on process side.

9. #3 EAPC vent condenser has no PRV.

10. Missing handle on lighting panel A-9.

11. SE of #2 CC junction box on beam - there is 1/2" conduit which is braced by wire.

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529 UNIT - 3rd LEVEL (Cont'd)

12. Cover is missing from liquid flow gage on ARC.

13. There is some scaffolding which is apparently not being used.

14. I-beam, deck grating and other fixtures are badly stained and rusting due to old acid leak from above.

15. There is a leak on both ends of the MEKRC solvent cooler.

529 UNIT - 4th LEVEL

1. Switch SW of MEKDC not labeled.

2. On W. side of BRC the metal covering the insulation is coming loose.

3. EARC insulation was taken off to repair leak - insulation has not been replaced.

529 UNIT - 5th LEVEL

1. Instrument cable for BRC head pressure not properly secured.

2. Three instrument cables not properly secured by service drop on S. end of structure.

3. Safety showers and eye baths have insufficient flow.

4. #2 AARC vapor line - hanger supports are not holding up the vapor line.

5. #2 EAPC dp transmitter stand is not properly braced.

6. Grating SE of #2 AARC is excessively springy.

7. Conduit between #2 AARC and MEKRC not properly braced.

529 UNIT - 6th LEVEL

1. S. end of stairway is rusted - rusting is busting the nuts out of steel.

2. Safety showers and eye baths have insufficient flow.

529 UNIT - 3200 TANK FARM AREA

1. Switchrack A-2 N. of ASC reflux pumps - breaker cover is screwed in only a few threads.

2. Unlabeled plastic container with liquid by tank 3204.

3. Chemical spill E. side of tank 3235 not properly cleaned up.

4. Chemical spill W. side of tank 3202 not properly cleaned up.

5. 1" valve bonnet on tank 3312 is leaking.

BRE 0148

529 UNIT - 3200 TANK FARM AREA (Cont'd)

6. The following tanks have no spring loaded gate at the top of the ladder: 3236, 3235, 3234, 3233, 3214, 3201, 3202, 3203 and 3204.

7. N. butyls transfer pump - concrete foundation is eaten away.

8. Starter rack A-3 needs new labels.

9. Starter rack A-3 - the breaker covers have many exposed threads.

10. Housekeeping around tanks 3260 and 3270.

11. Both pumps at tank 3235 need pigtail drains installed. Bearing housings are full of oil and the pumps are running hot.

12. There are two pumps and motors exposed to the atmosphere next to Bldg. 520.

13. Tank 3270 is not bolted to base.

14. Eye bath S. of tank 3270 has right side partially plugged.

HOUSEKEEPING

The Team rated the housekeeping in the area at 7.5.

If there are any questions, please contact this writer.

Mario Gutierrez

Mario Gutierrez for the
Plant Safety and Health
Inspection Team

MG:mfw

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