Printed: June 21, 2002, 2:53 PM Company: Safetech Location: Princeton, NJ Facility: Princeton PHA Method: HAZOP PHA Type: Initial

Process:

File Description: Chlorine Handling

Date:

Process Description:

Chemicals:

Purpose:

Scope:

Objectives:

Project Notes:

Filters: None

#### Company: Safetech Facility: Princeton

Session: (1) 07/02/00 Node: (1) Chlorine rail car Drawings: CLC/01-07-66 Parameter: Pressure

Intention: Normal operation is 100 - 150 psig. Target pressure is 125 psig.

| GW   | DEVIATION          | CAUSES  | CONSEQUENCES  | SAFEGUARDS  | S | L | R | REF# | RECOMMENDATIONS   | BY  |
|------|--------------------|---|---|---|---|---|---|------|---|-----|
| More | Higher<br>Pressure | 1. Fire exposure                              | 1.1. Potential<br>overpressurization<br>of rail car resulting<br>in release of<br>chlorine.         | 1.1.1. Rail cars<br>provided with relief<br>valve.<br>1.1.2. Rail cars<br>insulated                           | 1 | 4 | 4 |      | :No recommendations   |     |
|      |                    |   | 1.2. Potential<br>rupture of the rail<br>car if the rail car<br>relief valve fails.                 | 1.2.1. Location of<br>rail car minimizes<br>likelihood of<br>exposure.  | 1 | 5 | 5 |      | :No recommendations   |     |
|      |                    | 2. High ambient<br>temperature                | 2.1. Potential<br>increase in<br>pressure. Not likely<br>to approach rated<br>pressure of rail car. | 2.1.1. Rail cars<br>insulated<br>2.1.2. Location of<br>rail car minimizes<br>likelihood of<br>exposure.       | 5 | 1 | 5 |      | :No recommendations   |     |
|      |                    |   |   | 2.1.3. Pressure<br>indicator, PI-1.   |   |   |   |      |   |     |
| Less | Lower<br>Pressure  | 3. Relief valve RV-<br>25 fails open          | 3.1. Potential<br>exposure of<br>personnel and<br>potential offsite<br>impact                       | 3.1.1. Railcar<br>emergency leak<br>patch kit is available<br>on site.<br>3.1.2. Pressure<br>indicator, PI-1. | 1 | 4 | 4 |      | 3.1.1. Consider<br>conducting a failure<br>modes and effects<br>analysis (FMEA) of a<br>typical pressure relief<br>valve. | PWP |
|      |                    | 4. Empty rail car                             | 4.1. Delay in treating  | 4.1.1. Rail car is<br>weighed upon<br>receipt   | 5 | 3 | 9 |      | :No further<br>recommendations  |     |
|      |                    | 5. Sudden change<br>in ambient<br>temperature | 5.1. Potential for too<br>low flow to the<br>treatment system                                       | 5.1.1. Rail cars<br>insulated   | 5 | 2 | 8 |      | :No further<br>recommendations  |     |

Session: (1) 07/02/00 Node: (1) Chlorine rail car Drawings: CLC/01-07-66 Parameter: Composition

Revision: 0

Intention: Chlorine with less than 5 ppm moisture.

|   | GW    | DEVIATION   | CAUSES             | CONSEQUENCES       | SAFEGUARDS         | SL  | R | REF# | RECOMMENDATIONS          | BY  |
|---|-------|-------------|--------------------|--------------------|--------------------|-----|---|------|--------------------------|-----|
| I | Other | Other Than  | 1. Supplier loads  | 1.1. Consequences  | 1.1.1. Analysis of | 3 4 | 8 |      | 1.1.1. Consider          | DSC |
|   | Than  | Composition | rail car with      | will depend upon   | shipment by        |     |   |      | changing the SOP to      |     |
|   |       |             | incorrect material | what other         | supplier.          |     |   |      | require a certificate of |     |
|   |       |             |                    | materials could be |                    |     |   |      | analysis be received     |     |
|   |       |             |                    | delivered in rail  |                    |     |   |      | with each rail car and   |     |

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Session: (1) 07/02/00 Node: (1) Chlorine rail car Drawings: CLC/01-07-66

Parameter: Composition

Revision: 0

Intention: Chlorine with less than 5 ppm moisture.

| GW                       | DEVIATION  | CAUSES   | CONSEQUENCES  | SAFEGUARDS   | S | L | R | REF# | RECOMMENDATIONS                              | ΒY |
|--------------------------|--|--|---|--|---|---|---|------|--|----|
| Other<br>Than<br>(cont.) | Other Than<br>Composition<br>(cont.)             | 1. Supplier loads<br>rail car with<br>incorrect material<br>(cont.)              | cars.   | 1.1.1. Analysis of<br>shipment by<br>supplier. (cont.) |   |   |   |      | be checked before<br>accepting the rail car. |    |
| As<br>Well<br>As         | As Well As<br>Composition<br>(contaminatio<br>n) | 2. Rail car padded<br>with incorrect<br>material (e.g. moist<br>air) by supplier | 2.1. Moisture with<br>chlorine will cause<br>accelerated<br>corrosion of system<br>piping           | 2.1.1. Analysis of<br>shipment by<br>supplier.         | 3 | 4 | 8 |      | :No further<br>recommendations               |    |
|                          |  |  | 2.2. Consequences<br>will depend upon<br>what other<br>materials could be<br>delivered in rail cars | 2.2.1. As for 2.1.1                                    | 3 | 4 | 8 |      | :No further<br>recommendations               |    |

Session: (1) 07/02/00

Node: (1) Chlorine rail car

Drawings: CLC/01-07-66

Parameter: Level

Intention: Normal railcar liquid level varies between a maximum of 80 % of capacity to as empty as practical.

| GW   | DEVIATION    | CAUSES                                    | CONSEQUENCES   | SAFEGUARDS   | s | L | R      | REF# | RECOMMENDATIONS                                    | BY  |
|------|--------------|---|--|--|---|---|--------|------|--|-----|
| No   | No Level     | 1. Rail car received<br>empty             | 1.1. Delay in treating   | 1.1.1. Rail car is<br>weighed upon<br>receipt                          | 5 | 4 | 1<br>0 |      | :No recommendations                                |     |
|      |              | 2. Leak in rail car<br>or attached piping | 2.1. Potential<br>exposure of<br>personnel and<br>potential offsite<br>impact            | 2.1.1. Chlorine gas<br>sensors around rail<br>car unloading<br>station | 3 | 4 | 8      |      | :No recommendations                                |     |
|      |              |   |  | 2.1.2. Emergency C<br>kit available for rail<br>car leaks              |   |   |        |      |  |     |
| More | Higher Level | 3. Supplier<br>overloads                  | 3.1. Potential<br>overpressure of rail<br>car due to thermal<br>expansion of<br>material | 3.1.1. Rail car<br>weighed upon<br>receipt                             | 3 | 4 | 8      |      | 3.1.1. *Verify the scales are calibrated correctly | LSS |

#### Company: Safetech Facility: Princeton

Session: (1) 07/02/00

Node: (2) Cl2 liquid to vaporizer

Drawings: CLC/01-07-66 Parameter: Flow

| GW | DEVIATION | CAUSES                                  | CONSEQUENCES  | SAFEGUARDS   | S | L | R | REF# | RECOMMENDATIONS     | BY |
|----|-----------|---|---|--|---|---|---|------|---------------------|----|
| No | No Flow   | 1. Control valve CV-<br>32 fails closed | 1.1. Interruption to<br>production<br>operation due to<br>deviation of Cl <sub>2</sub> flow<br>from setpoint<br>causing control<br>system to shut<br>down process | 1.1.1. Failing<br>closed, or<br>accidentally closing,<br>a single valve will<br>not result in<br>overpressure since<br>line is open to either<br>end   | 4 | 4 | 9 |      | :No recommendations |    |
|    |           |   |   | <ul> <li>1.1.2. Operator<br/>response to a<br/>shutdown of the<br/>system would be<br/>immediate</li> <li>1.1.3. Limit switch<br/>provided on each<br/>valve which will<br/>indicate the valve is</li> </ul> |   |   |   |      |                     |    |
|    |           |   |   | closed<br>1.1.4. Micromotion<br>flow meter, FTLIQA   |   |   |   |      |                     |    |
|    |           |   | 1.2. Potential<br>overpressure of Cl <sub>2</sub><br>piping if liquid-filled,<br>closed piping heats<br>up  | 1.2.1. All valves (ball valves) in liquid $Cl_2$ service are provided with a port to vent the ball cavity  | 3 | 4 | 8 |      | :No recommendations |    |
|    |           |   |   | 1.2.2. Rupture disk<br>discharging to<br>expansion tanks are<br>provided for the<br>section of the piping<br>between<br>- VLIQA and VLIQB<br>- PCVGASC and<br>PCVGASB<br>(downstream of<br>vaporizer)        |   |   |   |      |                     |    |
|    |           |   |   | 1.2.3. Pressure<br>transmitters<br>provided on<br>potentially trapped<br>sections of piping<br>between:<br>- VRCA2 and VRCL<br>- VRCB2 and   |   |   |   |      |                     |    |

#### Company: Safetech Facility: Princeton

Session: (1) 07/02/00

Node: (2) Cl2 liquid to vaporizer

Drawings: CLC/01-07-66 Parameter: Flow

| GW            | DEVIATION          | CAUSES  | CONSEQUENCES  | SAFEGUARDS  | s | L | R | REF# | RECOMMENDATIONS   | BY  |
|---------------|--------------------|---|---|---|---|---|---|------|---|-----|
| No<br>(cont.) | No Flow<br>(cont.) | 1. Control valve CV-<br>32 fails closed<br>(cont.)                                | 1.2. Potential<br>overpressure of Cl <sub>2</sub><br>piping if liquid-filled,<br>closed piping heats<br>up (cont.)                  | VRCM<br>- VRCL/M and VLIQA<br>- VLIQB and<br>PCVGASC  |   |   |   |      | :No recommendations<br>(cont.)  |     |
|               |                    | 2. Control system<br>incorrectly activates<br>shutdown for<br>"rupture" condition | 2.1. Potential<br>overpressure of Cl <sub>2</sub><br>piping if liquid filled,<br>closed piping heats<br>up                          | 2.1.1. Rupture disk<br>discharging to<br>expansion tanks are<br>provided for the<br>section of the piping<br>between<br>- VLIQA and VLIQB<br>- PCVGASC and<br>PCVGASB | 3 | 4 | 8 |      | 2.1.1. *Investigate the<br>design of the rupture<br>disks and expansion<br>tanks and the pressure<br>setting (375 psig) of the<br>rupture disk<br>2.1.2. *Verify Chlorine<br>Institute requirements | JBS |
|               |                    |   |   | (downstream of<br>vaporizer)  |   |   |   |      | for venting valves with design of existing valves   |     |
|               |                    |   |   | 2.1.2. Failing<br>closed, or<br>accidentally closing,<br>a single valve will<br>not result in<br>overpressure since<br>line is open to either<br>end                  |   |   |   |      |   |     |
|               |                    |   |   | 2.1.3. Limit switch<br>provided on each<br>valve which will<br>indicate the valve is<br>closed  |   |   |   |      |   |     |
|               |                    |   |   | 2.1.4. Micromotion flow meter, FTLIQA   |   |   |   |      |   |     |
|               |                    | 3. Control valve<br>closes due to<br>incorrect signal or<br>setting               | 3.1. Interruption to production operation due to deviation of $Cl_2$ flow from setpoint causing control system to shut down process | 3.1.1. Failing<br>closed, or<br>accidentally closing,<br>a single valve will<br>not result in<br>overpressure since<br>line is open to either<br>end                  | 4 | 4 | 9 |      | :No further<br>recommendations  |     |
|               |                    |   |   | 3.1.2. Operator<br>response to a<br>shutdown of the<br>system would be<br>immediate   |   |   |   |      |   |     |

#### Company: Safetech Facility: Princeton

Session: (1) 07/02/00

Node: (2) Cl2 liquid to vaporizer

Drawings: CLC/01-07-66 Parameter: Flow

| GW            | DEVIATION          | CAUSES  | CONSEQUENCES  | SAFEGUARDS   | s | L | R | REF# | RECOMMENDATIONS                           | BY |
|---------------|--------------------|---|---|--|---|---|---|------|---|----|
| No<br>(cont.) | No Flow<br>(cont.) | 3. Control valve<br>closes due to<br>incorrect signal or<br>setting (cont.) | 3.1. Interruption to<br>production<br>operation due to<br>deviation of $Cl_2$ flow<br>from setpoint<br>causing control<br>system to shut<br>down process<br>(cont.) | <ul><li>3.1.3. Limit switch<br/>provided on each<br/>valve which will<br/>indicate the valve is<br/>closed</li><li>3.1.4. Micromotion<br/>flow meter, FTLIQA</li></ul> |   |   |   |      | :No further<br>recommendations<br>(cont.) |    |
|               |                    | 4. Manual block<br>valve is<br>accidentally closed                          | 4.1. Interruption to<br>production<br>operation due to<br>deviation of Cl <sub>2</sub> flow<br>from setpoint<br>causing control<br>system to shut<br>down process   | 4.1.1. Failing<br>closed, or<br>accidentally closing,<br>a single valve will<br>not result in<br>overpressure since<br>line is open to either<br>end                   | 4 | 4 | 9 |      | :No further<br>recommendations            |    |
|               |                    |   |   | 4.1.2. Operator<br>response to a<br>shutdown of the<br>system would be<br>immediate  |   |   |   |      |   |    |
|               |                    |   |   | 4.1.3. Limit switch<br>provided on each<br>valve which will<br>indicate the valve is<br>closed   |   |   |   |      |   |    |
|               |                    |   |   | 4.1.4. Micromotion flow meter, FTLIQA  |   |   |   |      |   |    |
|               |                    | 5. Filter plugged   | 5.1. Interruption to<br>production<br>operation due to<br>deviation of $Cl_2$ flow<br>from setpoint<br>causing control<br>system to shut<br>down process            | 5.1.1. Operator<br>response to a shut<br>down of the system<br>would be<br>immediate<br>5.1.2. Micromotion<br>flow meter, FTLIQA                                       | 4 | 2 | 7 |      | :No further<br>recommendations            |    |
|               |                    | 6. Micromotion<br>meter plugged   | 6.1. Interruption to production operation due to deviation of $Cl_2$ flow from setpoint causing control   | 6.1.1. Operator<br>response to a shut<br>down of the system<br>would be<br>immediate<br>6.1.2. Pressure  | 4 | 2 | 7 |      | :No further<br>recommendations            |    |

# Company: Safetech

Facility: Princeton

Session: (1) 07/02/00

Node: (2) Cl2 liquid to vaporizer

Drawings: CLC/01-07-66 Parameter: Flow

Intention: Flow approximately 1 - 5 lbs/min of liquid chlorine, at 100- 150 psig, from the railcar to the vaporizer.

| GW            | DEVIATION          | CAUSES                                     | CONSEQUENCES   | SAFEGUARDS   | S | L | R | REF# | RECOMMENDATIONS   | BY  |
|---------------|--------------------|--|--|--|---|---|---|------|---|-----|
| No<br>(cont.) | No Flow<br>(cont.) | 6. Micromotion<br>meter plugged<br>(cont.) | system to shut<br>down process   | transmitters<br>before and after the<br>meter  |   |   |   |      | :No further<br>recommendations<br>(cont.)   |     |
|               |                    | 7. Dip pipe (in<br>railcar) plugged        | 7.1. Interruption to production operation due to deviation of $Cl_2$ flow from setpoint causing control system to shut down process                      | <ul><li>7.1.1. Operator</li><li>response to a shut</li><li>down of the system</li><li>would be</li><li>immediate</li><li>7.1.2. Micromotion</li><li>flow meter, FTLIQA</li></ul> | 4 | 2 | 7 |      | :No further<br>recommendations  |     |
|               |                    | 8. Excess flow<br>valve closed             | 8.1. Interruption to<br>production<br>operation due to<br>deviation of $Cl_2$ flow<br>from setpoint<br>causing control<br>system to shut<br>down process | 8.1.1. Failing<br>closed, or<br>accidentally closing,<br>a single valve will<br>not result in<br>overpressure since<br>line is open to either<br>end                             | 4 | 4 | 9 |      | :No further<br>recommendations  |     |
|               |                    |  |  | 8.1.2. Operator<br>response to a<br>shutdown of the<br>system would be<br>immediate<br>8.1.3. Micromotion  |   |   |   |      |   |     |
|               |                    | 9. Line or flex hose<br>failure            | 9.1. Release of Cl <sub>2</sub><br>to the atmosphere   | 9.1.1. Railcars<br>inspected between<br>each load by<br>supplier<br>9.1.2. Chlorine gas<br>sensors in the<br>vicinity of the railcar<br>and in the vaporizer                     | 1 | 4 | 4 |      | 9.1.1. Consider<br>alternatives to the<br>present hanger<br>arrangements to allow<br>total insulating of the<br>piping while minimizing<br>external corrosion of the<br>piping. | LDS |
|               |                    |  |  | 9.1.3. Pressure<br>along the piping is<br>monitored by control<br>system. If pressure<br>differential exceeds<br>40-50 psig between<br>2 transmitters,<br>control system will    |   |   |   |      | 9.1.2. Consider whether<br>alternative materials of<br>construction are<br>practical which will<br>provide better internal<br>and external corrosion<br>resistance              | TLK |

#### Company: Safetech Facility: Princeton

Session: (1) 07/02/00

Node: (2) Cl2 liquid to vaporizer

Drawings: CLC/01-07-66 Parameter: Flow

| GW            | DEVIATION          | CAUSES  | CONSEQUENCES  | SAFEGUARDS   | s | L | R | REF# | RECOMMENDATIONS  | BY |
|---------------|--------------------|---|---|--|---|---|---|------|--|----|
| No<br>(cont.) | No Flow<br>(cont.) | 9. Line or flex hose<br>failure (cont.)   | 9.1. Release of Cl <sub>2</sub><br>to the atmosphere<br>(cont.)   | initiate a "line<br>rupture" shutdown<br>which closes all<br>valves on the liquid<br>Cl <sub>2</sub> piping<br>9.1.4. Piping<br>pressure tested<br>prior to each<br>campaign   |   |   |   |      | 9.1.2. Consider whether<br>alternative materials of<br>construction are<br>practical which will<br>provide better internal<br>and external corrosion<br>resistance (cont.) |    |
|               |                    |   |   | 9.1.5. Normal<br>preventive<br>maintenance<br>program for Cl <sub>2</sub><br>piping is to perform<br>non-destructive<br>testing of wall<br>thickness annually  |   |   |   |      |  |    |
| Less          | Less Flow          | 10. Block valve<br>(VRCG/H,<br>PCVLIQA) to vent<br>scrubber system<br>open or passing | 10.1. Potential<br>interruption to<br>production if flow<br>deviates<br>significantly from<br>setpoint          | 10.1.1. Second<br>block valve,<br>PCVLIQB, on vent<br>line from railcar<br>station would also<br>have to be<br>accidentally open or<br>passing   | 4 | 4 | 9 |      | :No further<br>recommendations   |    |
|               |                    |   |   | 10.1.2. Position<br>switches provided<br>on all valves leading<br>to the scrubber<br>system from the<br>liquid chlorine lines<br>(VRCG, VRCH,<br>PCVLIQA, PCVLIQB)<br>which indicate if the<br>valve moves off the<br>fully closed position. |   |   |   |      |  |    |
|               |                    |   | 10.2. Potential<br>release to the<br>atmosphere if<br>exceeds scrubber<br>capacity or scrubber<br>not operating | 10.2.1. All the valves<br>from the liquid<br>chlorine lines to the<br>scrubber (VRCG,<br>VRCH, PCVLIQA,<br>PCVLIQB) are<br>interlocked closed<br>by the control<br>system when   | 1 | 4 | 4 |      | :No further<br>recommendations   |    |

#### Company: Safetech Facility: Princeton

Session: (1) 07/02/00

Node: (2) Cl2 liquid to vaporizer

Drawings: CLC/01-07-66 Parameter: Flow

| GW              | DEVIATION            | CAUSES  | CONSEQUENCES   | SAFEGUARDS  | s | L | R | REF# | RECOMMENDATIONS   | BY  |
|-----------------|----------------------|---|--|---|---|---|---|------|---|-----|
| Less<br>(cont.) | Less Flow<br>(cont.) | 10. Block valve<br>(VRCG/H,<br>PCVLIQA) to vent<br>scrubber system<br>open or passing<br>(cont.)  | 10.2. Potential<br>release to the<br>atmosphere if<br>exceeds scrubber<br>capacity or scrubber<br>not operating (cont.)  | chlorine is in the<br>system, preventing<br>the operator from<br>accidentally<br>manually opening<br>the valve from the<br>console.   |   |   |   |      | :No further<br>recommendations<br>(cont.)   |     |
|                 |                      | 11. Partial<br>pluggage of any<br>component or<br>partially closed<br>valve   | 11.1. Potential<br>interruption to<br>production if flow<br>deviates<br>significantly from<br>setpoint   | 11.1.1. Pressure<br>transmitter, PTRCF,<br>on vent line from<br>railcar station would<br>increase if<br>upstream valve(s)<br>passing and<br>downstream closed   | 4 | 2 | 7 |      | :No further<br>recommendations  |     |
|                 |                      |   |  | 11.1.2. Temperature<br>indication, TTLIQA,<br>on vent line to flash<br>pot may indicate<br>lower temperature<br>due flashing of Cl <sub>2</sub><br>liquid   |   |   |   |      |   |     |
|                 |                      | 12. Leak  | 12.1. Release of Cl <sub>2</sub><br>to the atmosphere  | 12.1.1. Chlorine<br>sensor provided<br>near atmospheric<br>vent from scrubber<br>system<br>12.1.2. Control valve<br>on Cl <sub>2</sub> gas flow to<br>reactor, FCVGASA,<br>will open to attempt<br>to maintain set flow | 1 | 4 | 4 |      | 12.1.1. Review the best<br>available means for<br>periodic testing and/or<br>examination of the<br>chlorine liquid piping<br>system to ensure the<br>system integrity | PWP |
|                 | More Flow            | 13. N <sub>2</sub><br>pressurization<br>valve,<br>VRCC/VRCD,<br>opens during<br>padding of railcar,<br>and manual block<br>on tubing left open,<br>displacing liquid<br>Cl <sub>2</sub> in line with N <sub>2</sub> | 13.1. Potential<br>erratic flow due to<br>presence of N <sub>2</sub> in<br>system. Potential<br>overchlorination of<br>product due to<br>surge of chlorine<br>ahead of N <sub>2</sub> . Impact<br>on product quality.<br>Potential<br>overloading of | 13.1.1. Flow<br>indication and<br>control (FICGASA)<br>on chlorine flow to<br>reactor will throttle<br>to maintain set flow<br>13.1.2. Position<br>indicators on N <sub>2</sub><br>valves (VRCC,<br>VRCD) which         | 4 | 4 | 9 |      | :No recommendations   |     |

## Worksheet

Revision: 0

#### Company: Safetech Facility: Princeton

Session: (1) 07/02/00

Node: (2) Cl2 liquid to vaporizer

Drawings: CLC/01-07-66 Parameter: Flow

Intention: Flow approximately 1 - 5 lbs/min of liquid chlorine, at 100- 150 psig, from the railcar to the vaporizer.

| GW              | DEVIATION            | CAUSES   | CONSEQUENCES   | SAFEGUARDS   | S | L | R | REF# | RECOMMENDATIONS                | BY |
|-----------------|----------------------|--|--|--|---|---|---|------|--------------------------------|----|
| Less<br>(cont.) | More Flow<br>(cont.) | 13. N <sub>2</sub><br>pressurization<br>valve,<br>VRCC/VRCD,<br>opens during<br>padding of railcar,<br>and manual block<br>on tubing left open,<br>displacing liquid<br>Cl <sub>2</sub> in line with N <sub>2</sub><br>(cont.) | scrubber   | indicates<br>whenever the valve<br>is off normally<br>closed position.   |   |   |   |      | :No recommendations<br>(cont.) |    |
|                 |                      | 14. Higher than<br>normal pressure in<br>rail car  | 14.1. Potential<br>erratic flow due to<br>presence of $N_2$ in<br>system. Potential<br>overchlorination of<br>product due surge<br>of chlorine ahead of<br>$N_2$ . Impact on<br>product quality.<br>Potential<br>overloading of<br>scrubber                | <ul> <li>14.1.1. Backup<br/>manual valve on N<sub>2</sub><br/>line is normally<br/>closed except when<br/>pressure testing the<br/>piping.</li> <li>14.1.2. Pressure<br/>monitoring of<br/>pipeline</li> </ul> | 4 | 4 | 9 |      | :No recommendations            |    |
|                 |                      | 15. Flow control<br>valve, FCVGASA,<br>opens wide due to<br>incorrect signal or<br>setting   | 15.1. Potential<br>erratic flow due<br>presence of N <sub>2</sub> in<br>system. Potential<br>overchlorination of<br>product due surge<br>of chlorine ahead of<br>N <sub>2</sub> . Impact on<br>product quality.<br>Potential<br>overloading of<br>scrubber | 15.1.1. Independent<br>flow indication,<br>FTLIQA, to allow<br>operator to verify<br>flow control reading  | 4 | 4 | 9 |      | :No recommendations            |    |
|                 |                      | 16. Sudden<br>clearing of a<br>blockage  | 16.1. Potential<br>erratic flow due to<br>presence of $N_2$ in<br>system. Potential<br>overchlorination of<br>product due surge<br>of chlorine ahead of<br>$N_2$ . Impact on<br>product quality.<br>Potential<br>overloading of                            | 16.1.1. Flow<br>indication and<br>control (FICGASA)<br>on chlorine flow to<br>reactor will throttle<br>to maintain set flow  | 4 | 2 | 7 |      | :No recommendations            |    |

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Session: (1) 07/02/00

Node: (2) Cl2 liquid to vaporizer

Drawings: CLC/01-07-66 Parameter: Flow

Intention: Flow approximately 1 - 5 lbs/min of liquid chlorine, at 100- 150 psig, from the railcar to the vaporizer.

| GW              | DEVIATION            | CAUSES  | CONSEQUENCES   | SAFEGUARDS   | s | L | R | REF# | RECOMMENDATIONS                | BY |
|-----------------|----------------------|---|--|--|---|---|---|------|--------------------------------|----|
| Less<br>(cont.) | More Flow<br>(cont.) | 16. Sudden<br>clearing of a<br>blockage (cont.)   | scrubber due to<br>surge of chlorine   | 16.1.1. Flow<br>indication and<br>control (FICGASA)<br>on chlorine flow to<br>reactor will throttle<br>to maintain set flow<br>(cont.)   |   |   |   |      | :No recommendations<br>(cont.) |    |
| Revers<br>e     | Reverse Flow         | 17. Blockage of the<br>system<br>downstream of the<br>vaporizer   | 17.1. Vaporization of<br>liquid in vaporizer<br>will increase<br>vaporizer pressure<br>pushing liquid Cl <sub>2</sub><br>back to rail car          | 17.1.1. Chlorine line<br>is open back to the<br>rail car preventing<br>excessive pressure<br>buildup<br>17.1.2. Pressure<br>indication on<br>vaporizer outlet,<br>PTGASA   | 4 | 2 | 7 |      | :No recommendations            |    |
|                 |                      |   | 17.2. No flow,<br>sensed by<br>FICGASA, will<br>initiate a shutdown.<br>Will close VLIQB<br>and open VGASA to<br>vent vaporizer to the<br>scrubber | 17.2.1. Flow<br>indicators, FICGASA<br>and FTLIQA, will<br>indicate no flow<br>17.2.2. Line<br>upstream of VLIQB<br>is open to the railcar   | 4 | 2 | 7 |      | :No recommendations            |    |
|                 |                      | 18. Rupture of the N <sub>2</sub> pressurization line at the rail car when padding the rail car ail car | 18.1. Release of Cl <sub>2</sub><br>to atmosphere  | 18.1.1. Piping<br>downstream of<br>vaporizer is vented<br>to the scrubber thru<br>VGASA<br>18.1.2. Rupture disk<br>and relief valve on<br>vaporizer ,<br>discharging to catch<br>pot T-22, if blockage<br>is between<br>vaporizer and<br>VGASA. Additional<br>capability to<br>manually vent lines<br>thru VGASC or<br>PC/ULOA | 1 | 5 | 5 |      | :No recommendations            |    |
|                 |                      | 19. Failure of liquid<br>chlorine line or flex<br>hose  | 19.1. Release of Cl <sub>2</sub><br>to the atmosphere  | 19.1.1. Piping<br>downstream of<br>vaporizer is vented   | 1 | 5 | 5 |      | :No recommendations            |    |

## Company: Safetech

Facility: Princeton

Session: (1) 07/02/00

Node: (2) Cl2 liquid to vaporizer

Drawings: CLC/01-07-66 Parameter: Flow

| GW      | DEVIATION    | CAUSES                | CONSEQUENCES                     | SAFEGUARDS              | sı  | R   | REF# | RECOMMENDATIONS     | ΒY |
|---------|--------------|-----------------------|----------------------------------|-------------------------|-----|-----|------|---------------------|----|
| Revers  | Reverse Flow | 19. Failure of liquid | 19.1. Release of Cl <sub>2</sub> | to the scrubber         |     |     |      | :No recommendations |    |
| e       | (cont.)      | chlorine line or flex | to the atmosphere                | thru VGASA              |     |     |      | (cont.)             |    |
| (cont.) |              | hose (cont.)          | (cont.)                          |                         |     |     |      |                     |    |
|         |              |                       |                                  | 19.1.2. Rupture disk    |     |     |      |                     |    |
|         |              |                       |                                  | vanorizer               |     |     |      |                     |    |
|         |              |                       |                                  | discharging to catch    |     |     |      |                     |    |
|         |              |                       |                                  | pot T-22, if blockage   |     |     |      |                     |    |
|         |              |                       |                                  | is between              |     |     |      |                     |    |
|         |              |                       |                                  | vaporizer and           |     |     |      |                     |    |
|         |              |                       |                                  | VGASA. Additional       |     |     |      |                     |    |
|         |              |                       |                                  | capability to           |     |     |      |                     |    |
|         |              |                       |                                  | thru VGASC or           |     |     |      |                     |    |
|         |              |                       |                                  | PCVLIQA                 |     |     |      |                     |    |
|         |              |                       |                                  |                         |     |     |      |                     |    |
| Other   | Other Than   | 20. Failure of        | 20.1. Some flow of               | 20.1.1. Pressure        | 1 : | 5 5 |      | :No recommendations |    |
| Than    | Flow         | rupture disk on       | chlorine to the                  | indicator, PTLIQD,      |     |     |      |                     |    |
|         |              | liquid line           | expansion tanks                  | on line to expansion    |     |     |      |                     |    |
|         |              |                       |                                  | tanks                   |     |     |      |                     |    |
|         |              |                       | 20.2. Potential loss             | 20.2.1. Chlorine gas    | 4 ! | 5 1 |      | :No recommendations |    |
|         |              |                       | of expansion                     | sensors in the          |     | 0   |      |                     |    |
|         |              |                       | capacity if rupture              | vicinity of the railcar |     |     |      |                     |    |
|         |              |                       | disk released,                   | and in the vaporizer    |     |     |      |                     |    |
|         |              |                       | expansion tanks                  | building                |     |     |      |                     |    |
|         |              |                       | rise in expansion                | 20.2.2 Prossure         |     |     |      |                     |    |
|         |              |                       | tanks not observed               | along the piping is     |     |     |      |                     |    |
|         |              |                       | by operator.                     | monitored by control    |     |     |      |                     |    |
|         |              |                       |                                  | system. If pressure     |     |     |      |                     |    |
|         |              |                       |                                  | differential exceeds    |     |     |      |                     |    |
|         |              |                       |                                  | 40-50 psig between      |     |     |      |                     |    |
|         |              |                       |                                  | 2 transmitters,         |     |     |      |                     |    |
|         |              |                       |                                  | initiate a "line        |     |     |      |                     |    |
|         |              |                       |                                  | rupture" shutdown       |     |     |      |                     |    |
|         |              |                       |                                  | which closes all        |     |     |      |                     |    |
|         |              |                       |                                  | valves on the liquid    |     |     |      |                     |    |
|         |              |                       |                                  | Cl <sub>2</sub> piping  |     |     |      |                     |    |
|         |              |                       |                                  |                         |     |     |      |                     |    |
|         |              |                       |                                  | 20.2.3. Piping          |     |     |      |                     |    |
|         |              |                       |                                  | pressure lested         |     |     |      |                     |    |
|         |              |                       |                                  | campaign                |     |     |      |                     |    |

Facility: Princeton

Session: (1) 07/02/00 Node: (2) Cl2 liquid to vaporizer

Drawings: CLC/01-07-66

Parameter: Pressure

Intention: Normal operating pressure is approximately 100-145 psig.

| GW   | DEVIATION          | CAUSES  | CONSEQUENCES  | SAFEGUARDS  | S | L | R | REF# | RECOMMENDATIONS                | BY |
|------|--------------------|---|---|---|---|---|---|------|--------------------------------|----|
| More | Higher<br>Pressure | 1. Fire exposure  | 1.1. Potential<br>overpressurization<br>of rail car resulting                           | 1.1.1. Chlorine line<br>insulated except at<br>hangers                | 1 | 5 | 5 |      | :No further<br>recommendations |    |
|      |                    |   | chlorine.   | 1.1.2. Chlorine line<br>open to railcar<br>and/or vaporizer           |   |   |   |      |                                |    |
|      |                    |   |   | 1.1.3. Rail cars<br>insulated   |   |   |   |      |                                |    |
|      |                    |   | 1.2. Potential<br>rupture of the rail<br>car if the rail car<br>relief valve fails.     | 1.2.1. Rail cars<br>provided with relief<br>valve                     | 1 | 5 | 5 |      | :No further<br>recommendations |    |
|      |                    |   |   | 1.2.2. Location of<br>rail car minimizes<br>likelihood of<br>exposure |   |   |   |      |                                |    |
|      |                    |   |   | 1.2.3. Pressure<br>indicator, PI-1                                    |   |   |   |      |                                |    |
|      |                    | 2. Steam exposure   | 2.1. Potential<br>overheating if<br>broken steam line<br>discharges on<br>chlorine line | 2.1.1. Chlorine line<br>insulated except at<br>hangers                | 3 | 4 | 8 |      | :No recommendations            |    |
|      |                    |   |   | 2.1.2. Chlorine line<br>open to railcar<br>and/or vaporizer           |   |   |   |      |                                |    |
|      |                    |   |   | 2.1.3. Rail cars<br>insulated   |   |   |   |      |                                |    |
|      |                    | 3. High ambient<br>temperature<br>increase in<br>pressure. Not li<br>to approach rate<br>pressure of rail | 3.1. Potential<br>increase in<br>pressure. Not likely                                   | 3.1.1. Chlorine line<br>insulated except at<br>hangers                | 5 | 1 | 5 |      | :No further<br>recommendations |    |
|      |                    |   | pressure of rail car  | 3.1.2. Chlorine line<br>open to railcar<br>and/or vaporizer           |   |   |   |      |                                |    |
|      |                    |   |   | 3.1.3. Rail cars<br>insulated   |   |   |   |      |                                |    |
|      |                    | 4. Change in<br>ambient<br>temperature after<br>padding rail car  | 4.1. Potential for too<br>low flow to the<br>treatment system                           | 4.1.1. Chlorine line<br>insulated except at<br>hangers                | 5 | 2 | 8 |      | :No further<br>recommendations |    |
|      |                    | . č   |   | 4.1.2. Chlorine   |   | 1 |   |      |                                |    |

#### Company: Safetech Facility: Princeton

.

Session: (1) 07/02/00 Node: (2) Cl2 liquid to vaporizer

Drawings: CLC/01-07-66

Parameter: Pressure

Intention: Normal operating pressure is approximately 100-145 psig.

| GW              | DEVIATION          | CAUSES   | CONSEQUENCES  | SAFEGUARDS   | s | L | R | REF# | RECOMMENDATIONS                | ΒY |
|-----------------|--------------------|--|---|--|---|---|---|------|--------------------------------|----|
| More<br>(cont.) | Higher<br>Pressure | 4. Change in<br>ambient                              | 4.1. Potential for too low flow to the                              | line open to railcar<br>and/or vaporizer   |   |   |   |      | :No further recommendations    |    |
|                 | (cont.)            | temperature after<br>padding rail car<br>(cont.)     | treatment system<br>(cont.)   | 4.1.3. Pressure<br>indicator, PI-1<br>4.1.4. Rail cars                             |   |   |   |      | (cont.)                        |    |
| Less            | Lower<br>Pressure  | 5. Leak in rail car<br>or relief valve fails<br>open | 5.1. Potential<br>exposure of<br>personnel and<br>potential offsite | insulated<br>5.1.1. Railcar<br>emergency leak<br>patch kit is available<br>on site | 1 | 5 | 5 |      | :No further<br>recommendations |    |
|                 |                    |  | Impact  | 5.1.2. Pressure<br>indicator, PI-1   |   |   |   |      |                                |    |
|                 |                    | 6. Empty rail car                                    | 6.1. Delay in treating  | 6.1.1. Rail car<br>weighed upon<br>receipt   | 4 | 4 | 9 |      | :No further<br>recommendations |    |
|                 |                    | 7. Sudden change<br>in ambient<br>temperature        | 7.1. Potential for too<br>low flow to the<br>treatment system       | 7.1.1. Rail car<br>weighed upon<br>receipt   | 4 | 3 | 8 |      | :No further<br>recommendations |    |

Session: (1) 07/02/00 Node: (2) Cl2 liquid to vaporizer Drawings: CLC/01-07-66 Parameter: Composition Revision: 0

Intention: Chlorine to specification

| GW               | DEVIATION                 | CAUSES  | CONSEQUENCES   | SAFEGUARDS   | SL  | R | REF# | RECOMMENDATIONS   | BY  |
|------------------|---------------------------|---|--|--|-----|---|------|---|-----|
| As<br>Well<br>As | As Well As<br>Composition | 1. Water, or other<br>agents, in line after<br>cleaning   | 1.1. Potential for<br>accelerated<br>corrosion of the<br>piping  | 1.1.1. Normal<br>procedure for<br>cleaning includes<br>blowing the system<br>dry with N <sub>2</sub> after<br>cleaning | 3 4 | 8 |      | 1.1.1. Consider means<br>of cleaning the chlorine<br>piping system which do<br>not involve the use of<br>water or incompatible<br>materials           | LDS |
|                  |                           |   |  | 1.1.2. Training of<br>maintenance<br>personnel working<br>on chlorine system   |     |   |      |   |     |
|                  |                           | 2. Use of non-<br>compatible<br>materials, such as<br>hydrocarbon-<br>containing<br>greases, during<br>maintenance of | 2.1. Potential<br>reaction possibly<br>causing accelerated<br>corrosion, fire or<br>contaminants<br>affecting product<br>quality | 2.1.1. Normal<br>procedure for<br>cleaning includes<br>blowing the system<br>dry with N <sub>2</sub> after<br>cleaning | 3 4 | 8 |      | 2.1.1. Consider<br>modifying the training<br>program for<br>maintenance personnel<br>who may work on the<br>chlorine system to<br>include coverage of | TLK |

## Worksheet

#### Company: Safetech Facility: Princeton

Session: (1) 07/02/00 Node: (2) Cl2 liquid to vaporizer Drawings: CLC/01-07-66 Parameter: Composition Revision: 0

Intention: Chlorine to specification

| GW                          | DEVIATION                            | CAUSES | CONSEQUENCES   | SAFEGUARDS   | sι | - F | R REF# | RECOMMENDATIONS        | ΒY |
|-----------------------------|--------------------------------------|--------|--|--|----|-----|--------|------------------------|----|
| As<br>Well<br>As<br>(cont.) | As Well As<br>Composition<br>(cont.) | system | 2.1. Potential<br>reaction possibly<br>causing accelerated<br>corrosion, fire or<br>contaminants<br>affecting product<br>quality (cont.) | 2.1.2. Training of<br>maintenance<br>personnel working<br>on chlorine system |    |     |        | incompatible materials |    |

#### Page: 14 of 16

Session: (1) 07/02/00 Node: (3) Cl2 vaporizer Drawings: CLC/01-07-66 Parameter: Flow Revision: 0

Intention: Vaporize 100-150 pounds per hour. Target is 125.

| GW               | DEVIATION          | CAUSES  | CONSEQUENCES                               | SAFEGUARDS   | S | L | R | REF# | RECOMMENDATIONS  | BY  |
|------------------|--------------------|---|--|--|---|---|---|------|--|-----|
| No               | No Flow            | 1. Exit valve is in off<br>position             | 1.1.<br>Overpressurization<br>of vaporizer | 1.1.1. Relief valves<br>on vessel                                      | 3 | 4 | 8 |      | 1.1.1. *Verify relief<br>valves undergo periodic<br>testing                    | LSS |
|                  |                    | 2. Entrance valve is in off position            | 2.1. Product down<br>time                  | 2.1.1. None  | 4 | 4 | 9 |      | :No further recommendations  |     |
|                  |                    |   | 2.2. Excessive wear<br>on pumps            | 2.2.1. Pumps have<br>autoshutoff<br>switches to prevent<br>overheating | 3 | 4 | 8 |      | :No further<br>recommendations   |     |
| As<br>Well<br>As | As Well As<br>Flow | 3. N <sub>2</sub> purge stream<br>valve is open | 3.1. Impure product                        | 3.1.1. Feed is tested<br>when it is unloaded<br>from rail car          | 4 | 4 | 9 |      | 3.1.1. Consider updating<br>SOP to include a valve<br>configuration flow sheet | LSS |
|                  |                    | 4. Impure Cl <sub>2</sub> feed                  | 4.1. Impure product                        | 4.1.1. Feed is tested<br>when it is unloaded<br>from rail car          | 4 | 4 | 9 |      | :No further<br>recommendations   |     |
|                  |                    |   | 4.2. Side reaction causing exotherm.       |  | 3 | 4 | 8 |      | :No further recommendations  |     |

Session: (1) 07/02/00 Node: (3) Cl2 vaporizer Drawings: CLC/01-07-66 Parameter: Pressure Revision: 0

Intention: Vaporizer is intended to operate at 3 atm.

| GW   | DEVIATION          | CAUSES   | CONSEQUENCES   | SAFEGUARDS  | s | L | R | REF# | RECOMMENDATIONS   | BY  |
|------|--------------------|--|--|---|---|---|---|------|---|-----|
| More | Higher<br>Pressure | 1. Exit line from<br>vaporizer plugged                                 | 1.1. Failure to<br>provide adequate<br>supply to reactor                 | 1.1.1. Low flow<br>alarm present  | 4 | 2 | 7 |      | :No further<br>recommendations                                |     |
|      |                    |  | 1.2. Pressure build<br>up in vaporizer                                   | 1.2.1. Pressure<br>rating on vaporizer<br>exceeds that of the<br>supply tanks | 4 | 2 | 7 |      | :No further<br>recommendations                                |     |
|      |                    | 2. Chlorine supply<br>line has a greater<br>flow rate than<br>designed | 2.1. Pressure build<br>up in vaporizer                                   | 2.1.1. Pressure<br>rating on vaporizer<br>exceeds that of the<br>supply tanks | 3 | 4 | 8 |      | :No further<br>recommendations                                |     |
| Less | Lower<br>Pressure  | 3. Supply line<br>plugged  | 3.1. Loss of<br>productivity due to<br>low chlorine supply<br>to reactor | 3.1.1. Low flow<br>alarm present.   | 4 | 2 | 7 |      | 3.1.1. *Check to see if<br>this has ever been a<br>problem    | LSS |
|      |                    | 4. Rupture in line<br>exiting the<br>vaporizer                         | 4.1. Release of<br>chlorine to<br>atmosphere                             | 4.1.1. Chlorine gas sensors in the area                                       | 1 | 5 | 5 |      | 4.1.1. Consider<br>installing an automatic<br>chlorine source | JBS |

Session: (1) 07/02/00 Node: (3) Cl2 vaporizer Drawings: CLC/01-07-66 Parameter: Pressure Revision: 0

Intention: Vaporizer is intended to operate at 3 atm.

| GW              | DEVIATION                    | CAUSES   | CONSEQUENCES   | SAFEGUARDS  | s | L | R      | REF# | RECOMMENDATIONS  | BY  |
|-----------------|------------------------------|--|--|---|---|---|--------|------|--|-----|
| Less<br>(cont.) | Lower<br>Pressure<br>(cont.) | 4. Rupture in line<br>exiting the<br>vaporizer (cont.) | 4.1. Release of<br>chlorine to<br>atmosphere (cont.) | 4.1.1. Chlorine gas<br>sensors in the area<br>(cont.) |   |   |        |      | shutdown if the<br>vaporizer pressure<br>drops below 1.5 atm.  |     |
|                 |                              |  | 4.2. Loss of reactant                                | t   | 4 | 5 | 1<br>0 |      | :No further recommendations  |     |
|                 |                              | 5. Leak in vaporizer                                   | 5.1. Release of Cl <sub>2</sub><br>to atmosphere     | 5.1.1. Chlorine gas sensors in the area               | 1 | 5 | 5      |      | 5.1.1. Consider<br>implementing a periodic<br>check of vaporizer to<br>ensure there are no<br>pressure leaks | LDS |

PHAWorks by Primatech Inc.

| Node 1: Chlorine rail car       | 1  |
|---------------------------------|----|
| Parameter: Pressure             | 1  |
| Parameter: Composition          | 1  |
| Parameter: Level                | 2  |
| Node 2: Cl2 liquid to vaporizer | 3  |
| Parameter: Flow                 | 3  |
| Parameter: Pressure             | 12 |
| Parameter: Composition          | 13 |
| Node 3: Cl2 vaporizer           | 15 |
| Parameter: Flow                 | 15 |
| Parameter: Pressure             | 15 |