



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

1200 New Jersey Avenue SE
Washington DC 20590

APR 29 2019

Ms. Stacie Campbell-Eckhoff
Environmental Superintendent
Olin
1186 Lower River Road
Charleston, TN 37310

Dear Ms. Campbell-Eckhoff:

In an April 30, 2018, letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA), you requested an interpretation of 49 CFR Part 192. Specifically, you requested interpretation for the applicability of Part 192 to your pipeline.

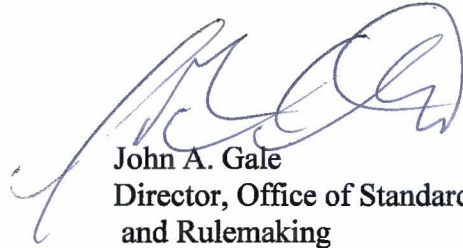
You stated that Olin and Wacker own and operate separate portions of a 4-inch diameter, 9,965-foot long (~ 1.9 miles) pipeline in Charleston, Tennessee used to transport chlorine gas from the Olin manufacturing facility to Wacker the customer. You stated that the Wacker-owned portion of the pipeline is a transmission line. Olin owns and maintains 5,240 feet (~1-mile) of the line that is completely within Olin's property line. You stated that just before the end of the Olin portion of the pipeline (where the pipeline transfers to Wacker) there is a manual block valve and directly upstream of the manual block valve there is an automatic shutoff valve that can be operated in the field by an "emergency stop" button or remotely from a central control room by Olin. Also, you mentioned an August 2010 PHMSA interpretation you believe indicates PHMSA does not apply the safety regulations to lines like yours. You asked whether Olin's portion of the line is regulated under Part 192.

Interpretation PI-09-0020, (Illinois Commerce Commission (Aug. 11, 2010)) responded to a request for an interpretation regarding whether "in-plant piping" operated by a large volume customer is subject to the pipeline safety laws and regulations. PHMSA stated that such piping downstream of where pressure control changes from a transmission pipeline operator to a large volume customer would not be subject to the pipeline safety regulations. The August 2010 Interpretation does not apply to your case, however, because Olin is not operating in-plant piping as a large volume customer receiving gas from a transmission line. In this case, the pipeline in question transports chlorine gas (a toxic and corrosive gas) from the Olin manufacturing facility to the Wacker transmission line.

Part 192 prescribes minimum safety requirements for pipeline facilities and the transportation of gas, including pipeline facilities and the transportation of gas within the limits of the outer continental shelf (49 CFR 192.1). In-plant pipelines that are involved in the transportation of gas are subject to the Part 192 regulations. It is the opinion of this office that the Olin owned and operated 5,240-foot pipeline line is involved in the transportation of gas and is subject to the regulations in 49 CFR Part 192.

If we can be of further assistance, please contact Tewabe Asebe at 202-366-5523.

Sincerely,

A handwritten signature in blue ink, appearing to read "John A. Gale", is written over the typed name and title.

John A. Gale
Director, Office of Standards
and Rulemaking



CHLOR ALKALI PRODUCTS AND VINYL

1186 Lower River Rd.
Charleston, TN 37310

April 30, 2018

SCE#034-18

Certified Mail – Return Receipt Requested

7013 2250 0002 2995 4030

Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: PHMSA Applicability Interpretation Request

Olin is requesting a formal interpretive letter on the applicability of the Transportation of Natural and Other Gas by Pipeline Regulations at 49 CFR Part 192 to Olin's portion of the Olin/Wacker pipeline. The Olin-owned portion of the pipeline is not on and does not cross public property, is owned and operated solely by Olin and is less than one mile in length. PHMSA's Interpretation #PI-09-0020 (August 11, 2010) appears to indicate that PHMSA elects not to apply the Federal gas pipeline safety regulations to such lines.

Olin and Wacker own and operate a pipeline in Charleston, Tennessee that is used to transport chlorine gas from the manufacturer (Olin) to the customer (Wacker). Part of the Wacker-owned portion of the pipeline crosses public land (Old Lower River Road) and is registered as a transmission line. Please see the attached color map of the pipeline (attachment 1), with Olin's portion of the line delineated in green, and Wacker's portion of the line delineated in blue. Also attached is a more detailed diagram of the pipeline (attachment 2).

General Description of the Pipeline

At Olin's Charleston Facility, gaseous chlorine is transferred to the neighboring Wacker Plant via a 4" diameter, insulated, electrically heat traced, Schedule 80, ASTM A106-B carbon steel transmission pipeline. The entire pipeline is approximately 9965 feet long running from the discharge of either the A or B train compressor on Olin's property to Wacker's HCl burner. Chlorine is not stored between the compressor and burner.

Olin owns and maintains the 5240 feet of pipeline on contiguous Olin property, terminating 330 feet north of Old Lower River Road at a manual block valve. Directly upstream of the manual block valve is an automatic shutoff valve that

can be operated in the field by an "emergency stop" button or remotely from the central control room by Olin. Immediately after the manual shut-off value, pipeline ownership transfers to Wacker.

Safety Features

The pipeline is subject to the Process Safety Management regulations of the Occupational Safety and Health Administration (29 CFR 1910.119). In addition to following these regulatory requirements, Olin is a voluntary member of the American Chemistry Council Responsible Care ® program and the Tennessee OSHA Voluntary Protection Program. The chlorine piping system was designed, constructed, and operated using Chlorine Institute Pamphlets 6 and 60, the industry standard or "recognized and generally accepted good engineering practice", i.e., REGAGEP. In addition, chlorine monitors are located every 500 feet along the pipeline. Routine visual, external and corrosion pipeline inspections are conducted.

If you require further information or have any questions, please contact me at 423-336-4724 or sjcampbell-eckhoff@olin.com.

Thank you for your consideration,



Stacie Campbell-Eckhoff
Olin Responsible Care
Environmental Superintendent

Attachment(s):

Attachment 1 - Color Map of the Pipeline

Attachment 2 - Detailed Diagram of the Pipeline

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CAUTION!
THIS DRAWING CONTAINS PSM
LINES (CL₂ OR SO₂)

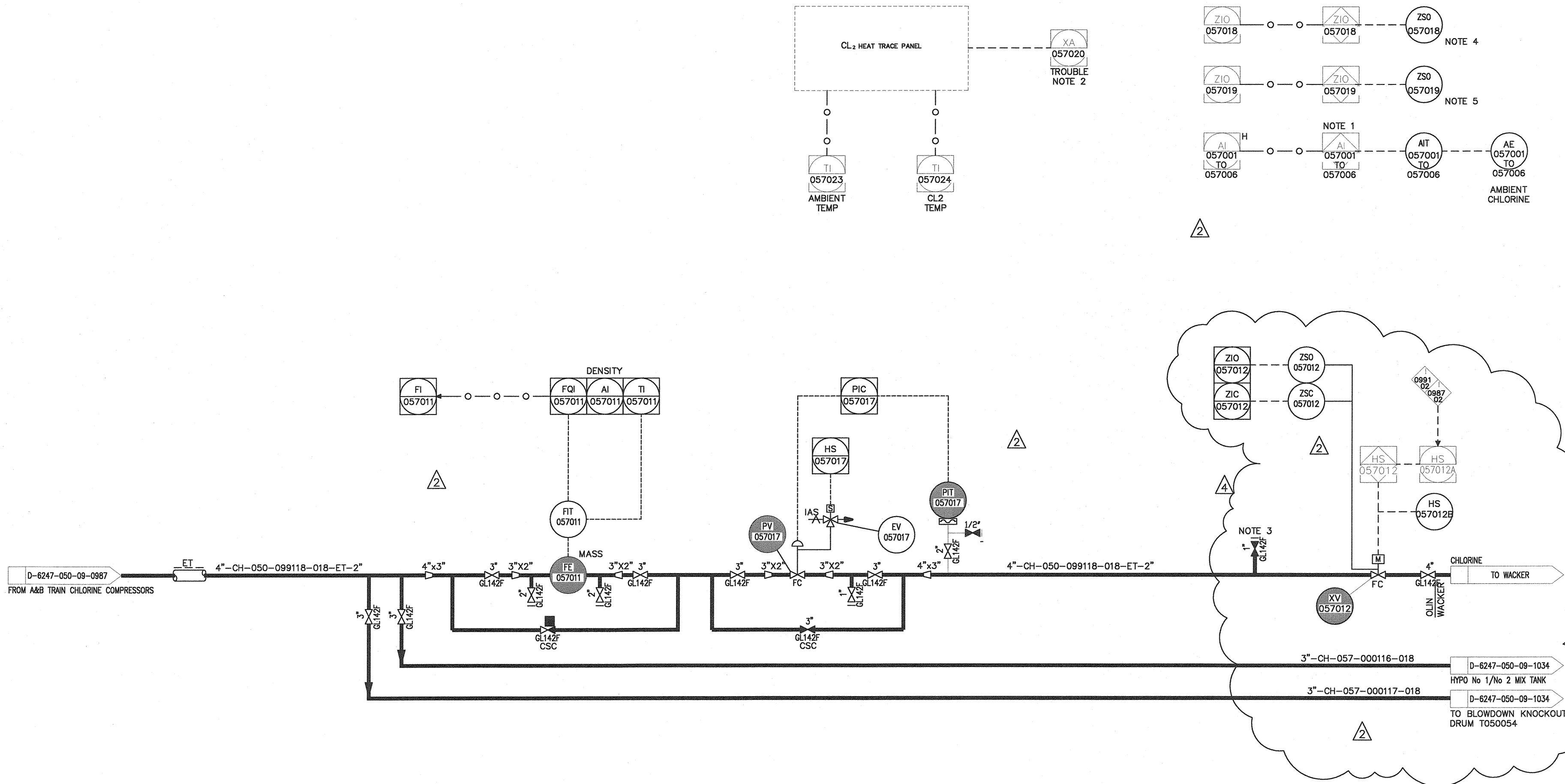
-	-	4	REV INSTR BUBBLE / ADD VALVE / REV CONT. TEXT	BB	3/6/15			DRAWN DATE
-	-	3	ADDED INTERLOCK NOTES	JL	2/20/15	BB		CHECKED DATE
-	-	2	DRAWING REINSTATED	JL	2/6/15	BB		APPROVED
-	-	1	VOID DRAWING, SUPERSEDED BY D-9082-157-09-0001	RDD	1-23-15	JL		
-	-	0	RELEASED FOR DESIGN (PIPE LINE)	BB	12/01/14	JL		
PROJ.	CAR	REV.	DESCRIPTION	DRAWN	DATE	CHK'D	APPROVED	

Olin PLANT ENGINEERING CHARLESTON PLANT		PROJECT NO.	C.A.R. NO.	SCALE NONE	DRAWING NUMBER D-9082-057-09-0001	REV 4

REFERENCE DRAWING:
D-0000-000-09-3020 - INSTRUMENTATION SYMBOL
& LEGEND SHEET.

NOTES

1. AMBIENT CL₂ MONITORS LOCATED APPROXIMATELY EVERY 500 FEET ALONG PIPE LINE. COORDINATE LOCATIONS WITH HIGH POINT VENTS AND FLANGE CONNECTIONS.
2. DCS ALARM ON HEAT TRACE FAILURE.
3. LOCATE VALVE NEAR XV-057012
4. DOOR SWITCH FOR REMOTE I/O PANEL 057-001.
5. DOOR SWITCH FOR REMOTE I/O PANEL 057-002.



INTERLOCK NOTES:
SEE DWG D-6247-050-09-0987
SEE DWG D-6247-050-09-0991

RELEASED FOR DESIGN
BY CHRIS WEEKS DATE 12-1-14

ROBINS & MORTON
power & industrial

CHLOR-ALKALI FACILITY
P & I DIAGRAM
"A" AND "B" COMPRESSOR
CHLORINE METERING