

GOAL: All locations should develop the capability and a plan to begin modeling emergency release scenarios to develop an understanding of potential impact of such releases.

STATUS: We have evaluated several chemical release modeling programs. The program which works best for our plant is SPILLS. Besides a gas release it can model a VCM leak which spills on the ground and evaporates. Engineering has collected the needed meteorological data and simulated a railcar leak where the entire contents are released over a two hour period.

We have been following the Clean Air Act Amendment which also requires modeling of release scenarios. We plan to do modeling after we get a better understanding of the CAAA requirements.

GOAL: All Company locations should complete development of a plant crisis management plan and test the program with a drill by the end of the second fiscal quarter.

STATUS: We continue to hold emergency drills every other month. A draft of our revised plant emergency response plan will be finished by May. After reviewing the plan and testing it with a drill the final plan should be approved by June 15.

All new employees are trained in their responsibilities and six drills are conducted each year. Some of the drills involve local city officials that are members of the Local Emergency Planning Committee - Fire Department, Ambulance and Police. We reevaluate our plan and make improvements based on items identified after each drill.

GOAL: All plants should develop and implement documented loading and unloading procedures for chemicals at company facilities that consider reduction of emissions and safety to personnel.

STATUS: During this last quarter we completed two projects for upgrading and improving our VCM unloading facilities. Both of these projects are safety and environmentally based. These projects improve safety and minimize the chances of a significant release associated with unloading and storage of VCM at the plant. Operating procedures for unloading VCM have been updated. Yard and Vinyl operator training on the changes and new equipment are complete.

We also have written procedures in place for plasticizer loading. We have developed a list of all other required loading and unloading procedures and developed a schedule for having completed written procedures by April 1994.

GOAL: Achieve an IA stage for code elements with a regulatory basis by the end of calendar year 1992. The elements included are listed below.

STATUS: CAER Code  
 Community Awareness item 3 is scored RI  
 Emergency Response item 2 is scored DP  
 Emergency Response item 3 is scored RI

Pollution Prevention Code  
 Element 2 is scored PP  
 Element 6 is scored RI  
 Element 7 is scored RI

Distribution Code  
 Element 2.2 is scored IA  
 Element 4.1 is scored DP  
 Element 5.1 is scored RI

CAER code Emergency Response item 2 deals with a plant/community emergency response plan. The status of the plants emergency response plan was discussed previously.

Distribution code element 2.2 has to do with training for all affected employees. The plant is in the process of conducting HAZWOPER training. The plant also is schedule to complete DOT required training in the near future.

Distribution code element 4.1 is documented procedures for selection and use of shipping containers. The Plant's safety department has responsibility for inspecting and monitoring totes. The Yard Supervisor (Vinyl department) works with our truck carrier (Butler) to monitor truck trailer safety. Our carrier contract includes quarterly preventive maintenance inspections on all trailers.

VCM railcar integrity is supervised by Stan Polwart in S&T. S&T is responsible for scheduling railcars for regular inspections. The schedule includes have safety valves inspected every five years and having tanks inspected every ten years.

Ted Nickerson will work with corporate to coordinate documentation for selection of containers

GOAL: All plants should review the training and communication requirements of all codes, determine site specific needs, and develop a plan to accomplish the training by end of FY93.

STATUS: Training needs is one of our plant goals and is part of OSHA process safety compliance. Aberdeen has a training needs analysis for operations. We are beginning to look at the results of the needs analysis and start developing a training plan that satisfies the OSHA requirements.

GOAL: Develop training and communication tools for implementation of the product stewardship code (Corporate Activity).

STATUS: N/A