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To Primary CHEMTREC Contacts
From S. F. Pitts
Date November 30, 1983
Subject Transportation Emergency Response Plan

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Attached is a finalized document for Conoco Chemicals that establishes a uniform policy on transportation emergencies and the procedures needed to fulfill our obligations. Incorporated in this document are most of the revisions suggested by the plants when they reviewed the draft.

The plan contains basic changes in organization structure but overall, the actual handling of a transportation emergency will remain essentially the same. Major changes include:

1. CTIRP Management Committee to serve as the company's overall policy making group for transportation emergencies.
2. CTIRP Manager to function as overall operational coordinator of plan and responses.
3. CTIRP Coordinators as the primary contact in each Chemical Plant for transportation emergencies involving shipments from that plant.
4. Specific guidelines on internal notification and use of corporate support specialists.

Although this plan contains some details on actually handling an emergency situation, each plant should have a local plan which covers procedures necessary for that plant to respond. The local plan should contain at least the following:

1. Personnel available and call list.
2. Notification if notified by local carriers.
3. Basic emergency equipment available.
4. Arrangements for maintaining communications between plant and on-site response team.
5. Periodic (semi-annual) updating of local plan.

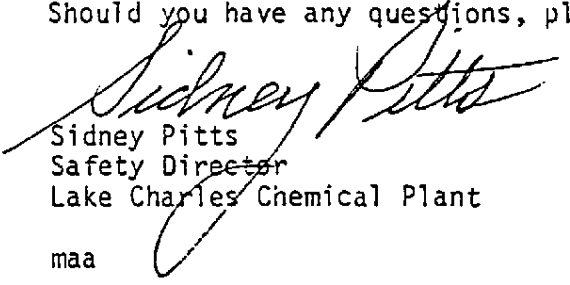
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As soon as you have developed your local response plan, forward a copy to me.

Appendix I, which contains some basic guidelines for handling transportation emergencies will be completed in the next few weeks. It will be sent to each plant at that time.

Should you have any questions, please let me know.


Sidney Pitts
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CHEMICAL TRANSPORTATION

INCIDENT RESPONSE
PLAN

CONOCO CHEMICALS

NOVEMBER, 1983

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INTRODUCTION

The Chemical Transportation Incident Response Plan (CTIRP) has been developed to establish a uniform procedure for responding to transportation incidents involving Conoco Chemicals Company products, both regulated and non-regulated. The company's primary goal is to provide timely assistance to carriers and agencies involved in an emergency situation. And, acting as a good corporate citizen, Conoco Chemicals may respond to emergencies involving other companies' products and equipment.

POLICY

1. Company products must be distributed without threat to employees, general public or the environment, and without product loss. Preparation of shipments for safe movement in the transportation system is one of the primary means of achieving this objective.
2. The responsibility for safe transport of Conoco Chemicals Company products rests with the carrier, once products have been tendered to them. Conoco Chemicals' role in a transportation emergency should be to advise and assist the carrier and other emergency service personnel at the scene.
3. It is Conoco Chemicals' policy to assist carriers and public agencies in emergency situations involving the transport to company products.

The extent of Conoco Chemicals' involvement in assisting with a transportation emergency depends on the involved carrier's ability or willingness to deal with the situation, the product involved and the seriousness of the incident.

"Advise" in this instance refers to providing technical information on products and transportation equipment. "Assist" refers to providing material resources, and in some cases, performing such functions as trans-loading or patching and repairing containers when necessary to reduce hazard(s).

Carriers are expected to assume ultimate responsibility for handling transportation emergencies. If the carrier cannot or will not fulfill this responsibility, and action is needed to correct a situation, Conoco Chemicals' personnel should take a more active "assistance" role. Such action should take into account the effects on all personnel, including bystanders, within the vicinity of the incident.

Conoco Chemicals Company representatives assisting with transportation incidents are expected to use good judgment, and to seek expert advice from within and/or outside the company when it becomes necessary.

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OBJECTIVES

In handling transportation incidents, there are three main objectives to consider. These objectives should be met, and completed in the following order of priority.

The objectives are:

- To prevent injuries, threats to the environment and property damage
- To clear obstructions (if any) so traffic on highways, railways and waterways may resume safely
- To safely salvage or contain the product(s) involved

There are secondary concerns which must also be addressed because of the impact on the company's business. These include but are not limited to:

- News media response
- Regulatory reporting requirements
- Shipping delays which will affect customers

LEGAL CONSIDERATIONS

In cases where Conoco Chemicals' on-site assistance is needed, the request for assistance should come from either the carrier or regulatory agency having jurisdiction over the transportation incident. Conoco Chemicals may also respond to requests from other companies and situations in which Conoco Chemicals determines that on-site attendance is to the company's advantage.

Recommendations for handling the incident should closely follow standard practices established by governmental regulations or suggestions by particular industry groups. In most instances, results of such action should be predictable if there is sufficient information known about the involved substance. When such knowledge is not known or available, the response team should use its best judgment and respond in as safe and proper a manner as possible.

Conoco Chemicals Company response team members should be selected based on capability and experience to respond in an emergency. Further, team members must be trained in emergency response procedures.

Once a suggested course of action has been recommended and agreed upon by those in charge of the emergency situation, this plan should be followed as closely as possible, consistent with changing conditions. If there are deviations which involve risks, these risks should be pointed out to the proper authority at the incident site.

If Conoco Chemicals' involvement in the transportation incident is limited to assistance over the telephone, such assistance should be restricted to specific information, such as chemical properties of the material involved, first aid treatment or additional transport equipment details (if known). In these cases, Conoco Chemicals' involvement should be limited to that which can be determined over a telephone. Any speculation or opinion should be avoided without obtaining more facts and/or observing the situation in person.

DEFINITIONS

A transportation incident is defined as a spill, leak, fire, release, personnel exposure, injury or transportation incident involving a Conoco Chemicals product or equipment while in any phase of transit between manufacturing point and user of that product.

Transportation incidents might include:

- Rail car derailments
- Tank truck accidents
- Small container leaks
- Marine-related accidents
- Failure of container safety devices
- Situations involving loading defects
- Customer problems of a safety nature relating to shipping containers

Transportation emergencies usually don't include delivery delays because of weather or other factor. And while a product release at a Conoco Chemicals' manufacturing plant requires emergency action, it is not classified as a transportation emergency. Procedures for handling in-plant emergencies are covered in each plant's emergency plan and Conoco Chemicals' Emergency Communication Plan.

ORGANIZATION

To manage transportation incidents and assure efficiency and reliability, Conoco Chemicals has developed the following internal structure for handling responses.

CTIRP MANAGEMENT COMMITTEE

Oversight of the transportation emergency policy and procedures is the responsibility of a CTIRP Management Committee. This committee is chaired by the General Manager of Manufacturing.

Other committee members include:

- The Manager of Biomedical and Environmental Affairs
- The Manager of Supply and Transportation
- The Manager of Communication
- The Safety Director at Lake Charles Chemical Plant

The management committee shall have the responsibility of approving, revising and reissuing this policy as needed, and of assuring that the policy's objectives are fulfilled.

The committee shall provide direction and guidelines of operation for the CTIRP Manager. In the event of serious incidents, the CTIRP committee shall standby to offer advice and counsel to Conoco Chemicals CTIRP teams at the site of incidents.

CTIRP MANAGER

Day-to-day operations of CTIRP is the responsibility of the Safety Director at Lake Charles Chemical Plant, who serves as CTIRP Manager.

The CTIRP Manager is in charge of all Conoco Chemicals' transportation incident responses to assure that policy objectives are achieved. To help meet these objectives, there is a CTIRP coordinator at each manufacturing location.

Duties of the CTIRP Manager will include:

1. Responsible for working with each plant manager to select a CTIRP Coordinator to represent that plant and to assure timely filling of vacancies that may occur.
2. Responsible for training and advising each CTIRP Coordinator in transportation emergency procedures, and assisting the coordinators in providing adequate training to response team members at each plant, developing emergency equipment capabilities and continuing the necessary emphasis on prevention of transportation emergencies.

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3. Responsible for determining the CTIRP Coordinator nearest the incident site or most familiar with the substance involved when a transportation incident occurs. The CTIRP Manager then is responsible for communicating the pertinent information regarding an incident to the appropriate CTIRP Coordinator or his official designate.
4. Be certain that incident coordinating services such as the Chemical Manufacturing Association's Chemtrec® is provided pertinent data on all products manufactured. As products are added or dropped, the CTIRP Manager is responsible for informing Chemtrec so their records will remain current. Each plant will furnish a semi-annual list of products to the CTIRP Manager.

COORDINATORS/TEAM MEMBERS

Plant Managers will work with the CTIRP Manager in selecting CTIRP Coordinators from their plant locations. This Coordinator and the Plant Manager also will select a Response Team from plant employees. The team's function will be to assist the Coordinator and/or CTIRP Manager in dealing with transportation incidents.

The number of Response Team members may vary by plant, according to the size of the plant, number of products handled/produced, etc. There should, however, be at least one Response Team member in addition to the Coordinator so that the individual can serve as a backup coordinator. In addition, arrangements to have at least one individual available on a 24 hour basis at each plant will be made.

Response Team members should possess certain needed knowledge and skills, including manufacturing, shipping, maintenance, environmental and technical expertise. In addition, they should possess good public relations skills such as being courteous, poised, articulate, truthful, able to think on their feet and have the authority to interact with various officials and the media.

Team member's names and telephone numbers (including residences) should be updated twice a year for the CTIRP Manager's records. This call list will be compiled by the CTIRP Manager and distributed to each plant location to be inserted in this manual for ready reference. The plant Coordinator will be responsible for updating when vacancies are filled.

CTIRP Coordinators also should assist their Plant Managers in compiling their plant's written response procedures and review the procedures for needed updating twice each year. The updated procedures should be sent to the CTIRP Manager.

The CTIRP Coordinators are responsible, in consultation with the CTIRP Manager, for providing training for Team members to handle incident situations, and in consultation with the Manager of Communication, for providing training in public relations principles and appropriate media responses.

CTIRP Coordinators are responsible for arranging for the acquisition and maintenance of any special equipment for Team members use at incident sites. This would include safety gear and other equipment necessary for handling particular substances relative to each plant location.

CHEMTREC®

To speed the handling of transportation incidents, Conoco Chemicals cooperates with the Chemical Transportation Emergency Center (CHEMTREC), a public service hotline operated by the Chemical Manufacturers Association (CMA), Washington, D.C.

CHEMTREC® telephone numbers are included on all Conoco Chemicals' bills of lading as a reference for carriers in the event of a transportation incident.

In the event of a transportation incident, carriers or anyone at an incident site may contact CHEMTREC® and receive immediate emergency handling information from its files. File information is provided voluntarily by CMA member companies (see section on CTIRP manager responsibilities).

After learning of an incident, CHEMTREC® notifies the shipper that there has been an incident. The shipper then becomes responsible for contacting the carrier or regulatory authority to determine if advice or assistance is needed.

CHEMTREC staffs its phones 24 hours a day, every day. CHEMTREC's® U.S. number (except in Washington, D.C.) is (800) 424-9300; calls inside Washington, D.C. should be made to 483-7616. Calls from outside the continental U.S. should be directed to (202) 483-7616.

PRIMARY NOTIFICATION PROCEDURES

1. Receiving the call

CHEMTREC has been informed that the Lake Charles Chemical Plant is the single notification point for Conoco Chemicals on any transportation incident calls. This includes calls involving Conoco Chemicals, Conoco, Inc. or other manufacturers' products, listing Conoco as the shipper.

CHEMTREC calls are made to the LCCP Main Guard Gate, (318) 491-5142, which is manned 24 hours a day.

Sometimes notification may come instead from the shipper, local authorities, regulatory agencies or others involved at the incident site. Calls sometimes may be directed to Conoco Chemicals because of the company's proximity to an incident site, or because the company may be viewed as the local authority on a chemical substance. In other situations, the carrier or customer may call other Conoco locations.

Any transportation emergency calls received throughout Conoco Chemicals' system (such as in the Supply and Transportation department) should be directed to Lake Charles Chemical Plant Main Guard Gate number. Unless this route is used, an effective response may be delayed unnecessarily.

The incoming call regarding a transportation emergency should be recorded on tape recorder by the guard on duty at LCCP.

Even though the conversation is being recorded, the guard must obtain information from the caller and record it on an CTIRP Call Data Sheet (see attachment):

2. Internal Notification (Conoco Chemicals)

The guard then reports the call and relays the information to the CTIRP Manager. If the CTIRP Manager is unavailable, the guard should contact the CTIRP alternate manager or the other alternates set-up for this purpose in the Lake Charles Chemical Plant.

3. Further Information Needed

The CTIRP Manager or his designate, or the CTIRP Coordinator, at the original shipping location after being notified by LCCP personnel will contact the person at the incident site to obtain further details which could be helpful in determining what further course of action by Conoco will be necessary. This action will be based primarily on answers to the following questions.

- A. Is the container leaking?
- B. What is the potential for leaks?
- C. What hazard does the product present? (Such as vapor spread, combustibility, flammability, toxicity, carcinogenicity, suffocation, corrosive, explosive or other hazards)
- D. What is the product's compatibility with others nearby?
- E. What is the potential for exposure to hazards presented above?
- F. Is the container damaged or in danger of being damaged? (for example, are there fires or explosions nearby?)
- G. What is the container's location in relation to people? (subdivisions, office buildings, downtown areas, well travelled highways)
- H. What is the container's location in relation to adjacent activities? (plants, highways or other sources of ignition, or potential exposure)

- I. What is the container's location in relation to streams, waterways or sewers which could carry leaking product to other areas?
- J. What are weather conditions? (such as flooding, heavy rains, wind which could disperse product or carry concentrations to other areas, ground fog, mist, or rain which could mix with product, electrical storm which could ignite product?)
- K. Is damage to the container such that the product must be transferred to another container, or that the container must be rerouted for inspection or repairs before resuming the trip?
- L. Has significant portions of the product been lost or contaminated?

4. Internal Decision Making & Notification

The CTIRP Manager along with the local Coordinator at the shipping plant will determine the initial response needed. In doing this, various implication of the incident will be considered and if necessary advice from support groups may be obtained and considered in the decision. This initial response decision will then be carried out by those personnel best suited to achieve the objectives of our policies.

The shipping plant will normally function as the focal point for needed notification to various corporate groups. The local Plant Manager will function as the primary contact for response teams who would be present at an incident site. He will keep the General Manager of Manufacturing advised of important situations that may arise during the handling of an incident, and additionally determines when information needs to be communicated to corporate support groups or to Federal or State regulatory agencies.

As a guideline the following situations may impact areas where corporate support groups can furnish needed assistance. In these cases, they will be notified when it becomes apparent that their participation or assistance is needed.

- A. Situations where serious environmental damage has occurred or the threat of such damage is significant (Biomedical & Environmental).
- B. Incident has or is expected to become a major news event and involves public injuries, major property damage or environmental threats. (Communications Department)
- C. Expected delays (24 hours or more) in the delivery of shipments to the customer. (Supply and Transportation)

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D. Barge Incidents - Conoco Inland Marine, Overseas Shipments, Export Department, U.S. Flag Vessel (Charter), Supply and Transportation

5. If a Conoco Chemicals Presence is Required at the Site

The person handling the emergency (the CTIRP Manager or Coordinator) will contact the Team members at his plant location to mobilize the crew. If the decision is made that Conoco Chemicals personnel must go to the site, at least two persons are needed -- one to perform the assistance from Conoco Chemicals' standpoint, and the other to act as the overall Conoco Coordinator, interact with local authorities and/or the media and assure greater safety for the team. The local Plant Manager must be informed prior to going to a site.

In general, the mode of transportation will be dictated by the seriousness of the incident and its distance from the crew that's to be activated. The CTIRP Manager and Coordinators have the authority to schedule corporate or commercial charter transportation if necessary, but are expected to use good judgment in deciding whether to use it.

If the incident site is located within approximately 150 miles, it is advisable to use ground transportation. However, special circumstances may require alternate form of travel.

If the situation allows, the person responsible for handling an incident (CTIRP Manager or Coordinator) should consult with the General Manager of Manufacturing or the plant manager nearest the incident site about hiring special services or equipment for the emergency site.

Coordinators and Managers or on site personnel are authorized to spend what is necessary to correct life-threatening situations or prevent serious threats to the environment. This may become necessary if the carrier refuses or is reluctant to carry out their responsibilities.

6. Follow-up

After an incident has been neutralized and cleaned up, a written report should be issued by the Coordinator at the site to the General Manager of Operations, CTIRP Manager and plant manager. It is a good idea to telephone Chemtrec to advise of the outcome of the situation. No written report should be issued to Chemtrec.

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APPENDIX I

CTIRP - Emergency Action Guidelines

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Appendix 2

CTIRP media relations

Responsibility for acting as spokesperson for the news media rests with the carrier, unless the carrier cannot or will not assume that responsibility. When Conoco Chemicals Company does become the spokesperson, it is imperative that the news media be provided all relevant facts regarding the incident. Information should be reported accurately and completely so that is correctly understood.

For incidents in which no Conoco Chemicals' presence is not required at the site, the responsibility for acting as a spokesperson will rest with the manager of communication. Even if the carrier has assumed the responsibility, the manager must be prepared with basic information in case the media contacts Conoco Chemicals.

For incidents in which a Conoco Chemicals' presence is is required at the site, the carrier still should provide information to the news media. However, if media representatives contact Conoco Chemicals for information, company personnel should respond if trained and qualified to do so. Advice and counsel should be sought from the Communication department if possible.

The CTIRP coordinator on site may act as spokesperson, in consultation with the manager of communication. If the incident is of sufficiently serious a nature, the manager of communication will arrange to travel to the site and act as spokesperson for the team.

While it is the intent of Conoco Chemicals to provide information that may help clarify the situation, spokespeople should use good judgment in selecting which information to give to the news media. For example, it would not be advisable to offer proprietary information, and under no circumstances should spokespeople speculate about the outcome of the incident.

When Conoco Chemicals Company does assume the role of spokesperson for a transportation incident, carrier public relations personnel should be advised before the news media is contacted. Conoco Chemicals' policy is to respond to press questioning with straight-forward answers as the facts are known. Spokespersons should never try to "cover-up." If facts are not known, the spokesperson should say so, and explain why. Withholding legitimate public information creates a "mystery" and prolongs the life of a news story.

Consistency is the hallmark of a good media relations program. All reporters should receive the same cooperation whether they represent large newspapers, small weeklies, radio stations or television. Promptness also is important. Deadlines are a way of life for the media, and prompt handling of an inquiry often can mean the difference between an inaccurate, unfavorable story or broadcast and one that is accurate and straightforward. However, a reporter's deadlines should not influence Conoco Chemicals personnel to make statements without factual information.

Favoritism has no place in media relations. Copies of releases and statements initiated by a spokesperson should be distributed to all interested media, unless planning and consultation with Houston management indicates otherwise.

It is never acceptable for a spokesperson to go "off the record" with a media representative or to try to kill a story. It is generally understood that this "agreement" to go off the record is not always observed. It's best to remember that all information presented to a reporter is likely to appear in the media, therefore it is imperative that spokespeople be prepared when making media statements or releases.

It is never advisable to offer proprietary information. Spokespeople also should never speculate about the incident's outcome.

CTIRP Managers or Coordinators should fill out a Call Data Sheet after learning of the situation to prepare themselves for any media inquiries. In this manner, all basic information regarding the transportation incident will be at hand when conducting a news interview with a media representative. This information should be communicated to the manager of communication so that he may keep abreast of the situation as well.

The basic facts of a news story are:

1. Who—Who was involved in the transportation incident? Include names of shippers, names of officials at site, etc. These should be obtained by the media from the person's employer, or refer the media to the medical facility at which the person is being treated. If people have been injured, say so, but do not speculate about their condition. Do not mention the names of injured parties unless next of kin have been notified.
2. What—What happened? As simply as possible, say what occurred. The ultimate cause probably would be speculation and do not speculate. Say what is being done to correct the situation.
3. Where—Where did it happen? Be exact, give accurate details.
4. When—When did it happen? Give hour, day, date.
5. Why—Why did the incident occur? Give this information, if you know, without adding speculation.
6. How—How did it happen? What were circumstances which caused it? Once again, do not speculate.

After giving the news media the basic facts involved in the transportation incident, offer to follow up to answer other questions. Sometimes it will be necessary to direct the reporter to another source for information needed to complete the story. Remember, if a second interview is promised, it is imperative that the interview be kept. Failing to be available or forgetting the interview could lead to speculative or inaccurate reporting.

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