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PVC PLANT SAFETY & HEALTH MANUAL
ABERDEEN, MS

SUBJECT: Emergency Plan - Emergency Organization Duties And Reporting Requirements

EFFECTIVE DATE: March 18, 1983

PREPARED BY: *A. H. Sather* Safety Director

APPROVED BY: *John* Manager

References: CRF 1910, Subpart L-Fire Protection, 1910.1017 Vinyl Chloride

Purpose: The Aberdeen Plant Emergency Plan is broken into two separate and supporting parts. This section, entitled Emergency Organization Duties And Reporting Requirements, contains the administrative details that support the immediate actions section of the plan. The primary objectives of this section are to:

1. Define the descriptions of each emergency duty assignment shown in the emergency organization structure; and,
2. Specify the reporting requirements in the event of a serious plant emergency.

EMERGENCY ORGANIZATION

Please refer to the attached EMERGENCY ORGANIZATION chart Attachment A) for the following discussion. When activated, this organization shall be directed by the Management Group, which bears overall responsibility for meeting the objectives of the plan.

Activation - Whenever an emergency occurs in the plant, the Shift Supervisor responsible for the affected area(s) will be in charge of all immediate actions, including activation of the Emergency Organization if required. During normal office hours, the organization shall be activated as directed by the Shift Supervisor by announcing "ACTIVATE EMERGENCY ORGANIZATION" three (3) times over the P.A. systems (P.A. and Gaitronics). During off hours and weekends, the Shift Supervisor shall instruct the Plant Guard to "call-out" the Emergency Organization (This can be requested by control room personnel). The Guard shall then call all personnel listed on the Emergency Organization Call List in rank order. If an individual cannot be reached, the Guard should then call the next person listed on the list. Once contacted, these personnel are to immediately come to the plant and assume their emergency duties.

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Specific Duties - The following is a discussion of specific duties assigned to each position in the Plant Emergency Organization.

1. Management Group

The Management Group will consist of the Plant Manager, the Plant Superintendent and the Employee Relations Director. The duties of the Management Group are:

- A. Provide leadership for the Emergency Organization and coordinate all activities connected with control of the situation.
- B. Promptly release factual information to the news media in order to prevent erroneous reports.
- C. Notify Corporate Management and keep them up to date on the situation.
- D. Notify next of kin in cases of serious or fatal injuries.
- E. Maintain close communication with the Emergency Officer.

2. Emergency Officer

The Operations Superintendent of the area affected will serve as the Emergency Officer. He will report directly to the Management Group and will be in overall charge of emergency control activities. He will be assisted in this duty by the Safety Director and the Chief Process Engineer. The alternate to the Operations Superintendent is the Operations Supervisor of the area involved. When the Operations Supervisor and Superintendent are both present, the Operations Supervisor will act as an assistant Emergency Officer. The duties of this function are:

- A. Work closely with the Emergency Brigade Crew Chief in determining the most effective manner of establishing control of the situation.
- B. Keep the Management Group informed of the situation and the action being taken to bring it under control.
- C. Rely on the advice and help of the Assistant Emergency Officer and the Safety Director.
- D. Issue instructions for the "Call-Out" of off-duty employees and advise the Security Officer of who is authorized to enter the plant.

3. Assistant Emergency Officer

The Chief Process Engineer and Operations Supervisor will serve as the Assistant Emergency Officers. They will assist the Emergency Officer in the evaluation of the situation and the planning of action necessary to establish control of the emergency. They will also provide any technical information regarding the equipment or process that might be necessary. They will keep the Emergency Officer informed of his whereabouts at all times. The Senior Process Engineer will serve as an alternate to the Assistant Emergency Officers.

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4. Security Officer

The Security Officer position will be filled by the Safety Supervisor and he will report directly to the Management Group. His specific duties are:

- A. Provide security protection for all plant property and material. This will include procurement and assignment of Guards, if needed.
- B. Dispatch personnel to the road blocks so that authorized personnel may be identified and allowed into the area. Unauthorized personnel must be turned back in a firm, tactful manner.
- C. Media representatives will be directed to the management group area in the front office area as directed by the Plant Manager.
- D. Provide emergency supplies that might be needed during the emergency. This includes emergency arrangements to obtain diesel fuel for the fire pumps.
- E. Monitor VCM concentrations in the area of the secondary evacuation area southwest of the guardhouse.

5. Safety Director

The Safety Director will assist the Emergency Officer in any way necessary in bringing the situation under control. His primary responsibility is in helping with fire fighting and rescue efforts. He will work closely with the Emergency Crew Chief.

Following an emergency, the Safety Director will assist Department Heads in restoring safe conditions throughout the Plant. He will also see that emergency equipment is serviced and placed in the proper locations. He will act as a team leader to make a detailed study of the causes of the emergency, action taken, and any recommendations made to prevent similar emergencies.

The Safety Director will also be responsible for the following areas of emergency readiness:

- A. Review the Fire Prevention and Emergency Plan on an annual basis and issue revisions in accordance with the work calendar.
- B. Organize training programs as necessary to insure prompt and adequate response to emergencies in the following areas.

Basic Fire Training -

- 1. Make sure that all operating, maintenance, support groups and professional personnel are exposed to basic fire fighting techniques pertaining to the use of portable fire extinguishers, emergency alarm systems and evacuation procedures. This will normally occur on an annual basis. New employees will receive basic fire training within 120 days of employment.

Advanced Fire Training -

2. Vinyl Department employees and members of the Emergency Crews will be trained more extensively in automatic fire control systems, operation of the plant fire water system, fire fighting methods and basic fire theory.

First Aid -

3. Organize annual refresher first aid training of off-shift first aid personnel and basic first aid for all personnel who work in the plant operating areas.

C. Insure that fire fighting and emergency equipment is maintained in operable condition at all times.

6. Emergency Chief

The Vinyl Shift Supervisor will fill the position of the Emergency Crew Chief during emergencies in the Vinyl Reactor, Vinyl Dryer, Boilerhouse, Waste Treatment and VCM Tank Farm areas. The Compound Shift Supervisor will act as the Emergency Crew Chief in the Compound, Plasticizer, Laboratory Office and Warehouse areas. the appropriate Chief will direct the Fire Crew and others involved in fire control or other emergency action. He will work closely with the Safety Director in the effective use of manpower and equipment necessary to bring the situation under control.

The Emergency Chief will usually be the first individual in authority to recognize the existence of an emergency situation. He must make the immediate decisions regarding the emergency action and continue in this capacity until the Emergency Organization can assemble, if it is required. The Emergency Chief will initiate the necessary action to put this plan into effect.

The specific duties of the Emergency Chief in time of emergency are detailed in the Emergency Plan - Immediate Actions plan, section 1.231.

Once the Emergency Officer arrives, the Emergency Chief will report to him.

7. Assistant Emergency Chief

The Compound Shift Supervisor will serve as the Assistant Emergency Chief during emergencies in all areas of the plant, except Compound, Plasticizer, Laboratory, Office and Warehouse. In those areas, the Vinyl Shift Supervisor will act as Assistant Emergency Chief. The Assistant Chief's duties will be as follows:

- A. Make sure that all of the Emergency Crew members in his area leave for the scene of the emergency.
- B. Report to the Emergency Chief for instructions.

8. Mechanical Chief

The Mechanical Superintendent will act as the Mechanical Chief during the time of the emergency. The alternate is the Maintenance Superintendent. In this capacity, the Mechanical Chief will report to the Emergency Officer. He will carry out the following duties:

- A. Organize and direct damage control work as directed.
- B. He will be in charge of all personnel reporting to the Shop Area.
- C. Assist the Emergency Officer in any way necessary to bring the situation under control.
- D. Establish relations with outside utility companies and work closely with them, maintaining or restoring service as soon as possible.
- E. Notify the Security Officer of the names of those people in the plant under his direction and of any who have been called out.
- F. Keep the Emergency Officer informed of his whereabouts at all times.
- G. Organize and direct clean-up and repair crews for the purpose of getting the plant safely back into operation as soon as possible.

9. First Aid Chief And Assistants

The Nurse will act as the First Aid Chief and will report of the Emergency Officer. The Laboratory Lead Technician will act as as Assistant. The alternate for the Nurse will be the Laboratory Shift Supervisor. When all first aid personnel are present, the laboratory personnel will assist the Nurse. The duties of this function are:

- A. The First Aid Chief and Assistants will go immediately to the emergency scene whenever the Emergency Organization is activated or there is a call for First Aid help.
- B. Give First Aid to the injured.
- C. Advise the Communications Chief if ambulances are needed.
- D. Keep the Management Group and the Security Officer informed of injuries, including the names and estimates of severity.
- E. Transport injured personnel by ambulance.

10. Messengers

The Messengers will report to the Emergency Organization member to whom they are assigned. The Mechanical Superintendent will assign Mechanical Engineers to the messenger positions as appropriate.

11. Fire Pump Operators

Serious plant emergencies can require extended operation of fire pumps. In order to meet this need, the fire pumps will be staffed using Mechanical Department personnel. During normal day operation, the tool room mechanic will report to the Number 1 (north) pump house, and the Shift Mechanic will report to the Number 2 (south) fire pump house. Whenever the Shift Mechanic is the only employee available, he will move back and forth between the two pump house buildings. Coverage is necessary at both pump houses anytime the Emergency Organization is called out. The Guard is to call out the auto mechanics from the Maintenance Call In List any time this occurs.

The duties of the fire pump operator are:

1. Monitor engine temperatures and oil pressure,
2. Monitor for abnormal sounds and conditions,
3. Monitor fuel levels and alert the security officer (Alternate: Safety Director) when fuel levels fall below 50 percent. The Security Officer will then initiate procurement of the fuel.
4. Monitor and report any abnormal conditions to the Security Officer (Alternate: Safety Director).

Whenever there is no coverage by any of the above, the Plant Guard shall insure that the north fire pumps are operating. The Vinyl Shift Supervisor shall be responsible for the shutdown of the fire pumps when any emergency condition has been corrected.

12. Emergency Crews

There are two Emergency Crews. The objectives of these crews are to insure that, through quick action, we will be able to protect employees and minimize any damage due to fire. Both crews are to report to the announced location of the emergency immediately when summoned by alarms, the Shift Supervisor, or when the Emergency Organization is activated as noted in the Emergency Plan - Immediate Actions section 1.231. The crews will consist of the following, based on a Vinyl area emergency:

Number 1 Emergency Crew

Emergency Crew Chief -

Vinyl Shift Supervisor
Chief Operator
Dryer "A" Operators (2)
Dryer Utility

Number 2 Emergency Crews

Assistant Crew Chief -

Compound Shift Supervisor
Automatic Bag Operator
Line I Bagging Utility
Line III Mill Utility
Dry Blend Utility (if available)
Line I Compounder

The specific duties and responsibilities are fully outlined in the Emergency Plan - Immediate Actions, section 1.231.

13. Support Group

The Support Group will consist of all Maintenance, Warehouse, and Yard Personnel (Supervisors and Hourly). They will report to the Maintenance Shop and be under the orders of the Mechanical Chief. The Maintenance Superintendent - Mechanical will stay in the shop with the personnel. The Mechanical Chief will contact him for assistance.

14. Guards

The specific duties of the Security Guard are:

- A. Direct ambulance and other vehicles to the emergency scene as noted in the Emergency Plan - Immediate Actions Plan (1.231) Section on outside assistance - Aberdeen Fire Department portion.
- B. Stop all other vehicle traffic into the plant anytime an alarm is sounded. Have the driver park without blocking the gate. Do not permit any unauthorized personnel to enter the plant (See media response below).
- C. Phone the Emergency Organization when instructed to do so by the Vinyl Shift Supervisor, the Compound Supervisor, or their designees. (See Attachment B.)
- D. Monitor fire pump operation as noted in 11 above.
- E. Record wind direction and speed, barometric pressure, time and outside temperature at time of occurrence if a gas release or fire has occurred.
- F. Announce the wind speed and direction (i.e., from _____, to _____) over the plant public address system if a gas release or fire has occurred.
- G. Media response - In a serious plant emergency, media personnel will either be calling in or presenting themselves at the gate. Calls by the media on the telephone shall be handled by requesting the caller's name, who he/she represents, a phone number they can be reached at and a promise that the message will be given to the manager or his designee. The statement should also include

14. Guards (Continued)

the fact that either the Plant Manager or his designee will call them with a statement. Media personnel who arrive at the gate will be escorted by CONOCO personnel from the gate area to a predetermined location where the manager or his designee will make a statement.

15. Communications Chief

The Director of Administrative Services will act as the Communications Chief. His alternate will be the Plant Accountant.

A. Establish the gatehouse switchboard as an emergency and communications headquarters. The Communications Chief shall also prearrange for a Secretary to act as the Switchboard Operator. Several alternates should be planned. The Switchboard Operator should be contacted soon after receipt of the call to activate the Emergency Organization. Timing for this is shown on the Emergency Organization.

B. Handle all incoming and outgoing calls.

REPORTING

All emergencies will be reported by the Plant Manager to the General Manager of Manufacturing within 24 hours. For this reason, the Plant Manager must be informed in a timely fashion of any emergency incident. The guidelines for reporting emergency conditions are shown below.

Fires

1. Any fire which causes serious damage should be reported to the Plant Manager immediately.
2. All other fire incidents should be reported to the Plant Manager by the next workday after the fire.

All fires will be thoroughly investigated by a team appointed by the Plant Manager. A FIRE REPORT (Attachment C must be completed as rapidly as possible for use by the investigating team.

Vapor Releases and Other Emergencies

1. The Operations Superintendent will issue a written report on each VCM emergency as soon as possible, not to exceed 24 hours.
2. The Plant Safety Director will report VCM emergencies and the facts obtainable to the OSHA Area Director as required by OSHA Regulations.
3. The Chief Process Engineer will report VCM emergencies and the facts obtainable to the Mississippi Bureau of Pollution Control and to the Regional Administrator of the Environmental Protection Agency as required by NESHAP and State regulations.

Vapor Releases And Other Emergencies (Continued)

4. The Chief Process Engineer must be notified regarding any spill of a potentially hazardous material as soon as the spill is discovered. The Chief Process Engineer will promptly report the spill to the Superfund National Response Center if required by regulation.

A PLANT EMERGENCY ALARM DATA SHEET (Attachment D) must be completed by the operator whenever the alarm is activated (tests included). When completed, it must be sent to the Safety Director.

PUBLIC ALERT

During an emergency, the Plant Manager, or his designee, will determine if and when action is required to protect the public, including request for Law Enforcement Assistant. Any requests for information from reporters or other persons outside the plant including employees shall in all cases be directed to the Plant Manager or his designee (See media response above, Item 14, G).

REENTRY TO WORK AREAS

Personnel, except those required to deal with the emergency condition, shall not be allowed to reenter endangered areas until the emergency condition has been corrected and verified.

Upon establishment of control over VCM releases, the Shift Supervisor, equipped with Scott Air Pak and HNU Photoionizer shall verify that all areas have returned to safe levels. Whenever an employee reenters a work area in which a VCM release has occurred, for the purpose of verifying safe levels, there shall be at least two other persons equipped with Scott Air Paks observing from a safe distance. In some cases, this may be done by Honeywell readings.

During normal office work hours, the Safety Supervisor shall monitor public and total plant area safety with portable monitoring instruments and Scott Air Pak, if necessary. During his absence, this task shall be performed by the Vinyl Shift Supervisor. Again, this may be done by Honeywell readings.

MEDICAL TREATMENT AND SURVEILLANCE

Anyone who is injured during any emergency is to be immediately treated as appropriate to circumstances.

Anyone who loses consciousness because of inhalation of any substance is to be taken to the Aberdeen-Monroe County Emergency Room as soon as possible. In all cases, the treating physician must be given the chemical name of the agent (gas) which is suspected of causing the injured person to be overcome.

Medical treatment of any employees injured by any substance will be that determined most appropriate by the Corporate Medical Division or its designee.

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EMERGENCY TELEPHONE NUMBERS

1. Medical

Ambulance, Monroe County Hospital369-2455
Dr. Coghlan, Office369-2411
Home369-4418
Dr. Turnage, Office369-2413
Home369-6311

2. Police

Aberdeen Police Department.369-6454
Sheriff's Office.369-2468
Mississippi State Police.(Contact Police
Department)

3. Fire Department

Aberdeen Fire Department.369-9551

4. Light and Water Department

Aberdeen Light & Water Department369-4731
or369-2159
or369-6454

5. Headquarters Personnel

R. E. Lehmkuhl, Office.ETN 629-3580
Home.(713) 531-3580
Home.(713) 780-1270
R. D. Gamblin, OfficeETN 629-3460
Home.(713) 531-3460
Home(713) 531-7242
M. S. Reynolds, Office.ETN 369-3210
Home.(713) 531-3210
Home.(713) 445-9187
J. J. Hall, Office.ETN 629-3450
Home.(713) 531-3450
Home.(713) 376-8154

6. Public Relations Personnel

HoustonJohn Gehbauer (office)ETN 672-3115
Home.(713) 965-3115
Home.(713) 376-9279
Lake Charles.Carlton Adams (office)ETN 650-4215
Home.(318) 494-4215
Home.(318) 477-9640

Ponca City.Alan Amsden (office)ETN 442-4093
(405) 767-4093
 (home)(405) 762-3666

7. CHEMTREC Emergency Numbers

See CHEMTREC Call Manual

STORM WARNING

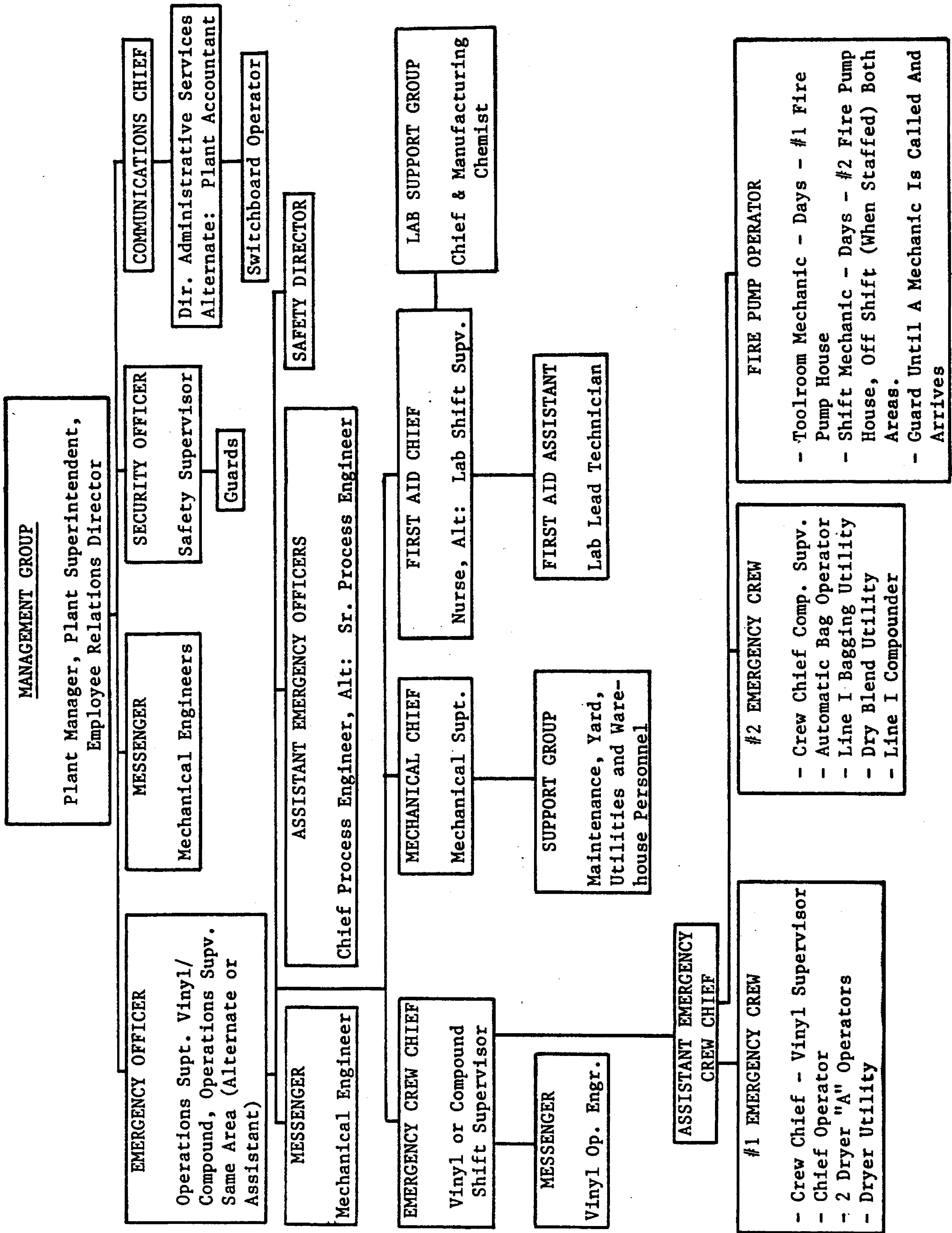
The procedures are established to give personnel early tornado warning. When atmospheric conditions indicate that a tornado is possible:

1. The guard will continuously monitor National Weather Service broadcasts for weather reports.
2. If the Weather Service announces a tornado watch for the area, the Guard will:
 - A. On days - contact Plant Manager, Plant Superintendent, and all Department Heads.
 - B. During off-shifts and weekends - contact the Vinyl, Lab, and Compound Supervisors.
 - C. Be watchful for an approaching tornado cloud.

NOTE: Whenever the Vinyl Shift Supervisor is notified of an approaching severe weather system, he may direct his employees to stop charging and to initiate any other measures dictated by operating procedures to prevent the release of VCM.

3. If the Guard spots an approaching tornado cloud, he will call the Vinyl Control room and ask that the tornado alert alarm, on the plant alarm system be sounded, and announce it over the plant P.A. systems (P. A. and Gaitronics).
4. Whenever an approaching tornado cloud is announced, all personnel will take whatever action and cover that is established by departmental procedures.

ATTACHMENT A
EMERGENCY ORGANIZATION



ATTACHMENT B

EMERGENCY ORGANIZATION CALL LIST

When advised by the Shift Supervisor, or his designee, the guard will start calling the names listed below in numerical sequence (rank order) from the appropriate list.

<u>Vinyl</u>	<u>Compound</u>	<u>Utilities</u>
1. D. J. Miller 369-9234	1. R. G. Gilreath 369-7745	1. J. L. Horstman 369-6005
2. P. E. Markey 369-6019	2. P. J. Kober 369-7096	2. F. W. Frantz 369-8508
3. L. D. Honeycutt 343-5595	3. L. D. Honeycutt 343-5595	3. C. E. Davis 369-8780
4. C. R. Miller 369-9100	4. C. R. Miller 369-9100	4. C. R. Snowden 1-327-7382
5. A. H. Sather 369-9271	5. A. H. Sather 369-9271	5. C. R. Miller 369-9100
6. V. A. Belk 369-4416	6. V. A. Belk 369-4416	6. A. H. Sather 369-9271
7. J. Friend 369-7377	7. J. Friend 369-7377	7. V. A. Belk 369-4416
		8. J. Friend 369-7377
(1) J. Frossard 369-6990	(2) L. Michels 369-6743	(3) J. Pope Unlisted (Call So. Central Bell Operator)
8. J. L. Horstman 369-6005	8. J. L. Horstman 369-6005	9. L. D. Honeycutt 369-5595
9. C. E. Davis 369-8780	9. C. E. Davis 369-8780	10. P. E. Markey 369-6019
10. C. R. Snowden 1-327-7382	10. C. R. Snowden 1-327-7382	11. D. J. Miller 369-9234
11. F. W. Frantz 369-8508	11. F. W. Frantz 369-8508	12. P. J. Kober 369-7096
12. P. J. Kober 369-7096	12. P. E. Markey 369-6019	13. R. G. Gilreath 369-7745
13. R. G. Gilreath 369-7745	13. D. J. Miller 369-9234	14. J. G. Roberts 369-8059
14. J. G. Roberts 369-8059	14. J. G. Roberts 369-8059	15. J. V. Uptain 369-8109
15. J. V. Uptain 369-8109	15. J. V. Uptain 369-8709	16. M. H. Williams 1-963-2796
16. M. H. Williams 1-963-2796	16. M. H. Williams 1-963-2796	
17. G. A. Morgan 369-6522	22. J. C. Green 369-9288	27. R. W. Rye 369-4730
18. R. A. Miller 1-327-0951	23. W. W. Robinson 369-8606	28. D. D. Knight 1-205-698-9545
19. R. A. Frohreich 1-328-3628	24. W. F. Higginbotham 1-327-0827	29. R. D. Jackson 369-2405
20. V. L. Thornhill 369-8952	25. J. A. Dixon 369-8372	30. V. E. Messick 1-327-0741
21. S. C. Hillman 369-7892	26. J. L. White 369-2991	31. D. S. Cox 369-8752

ATTACHEMENT C

ABERDEEN CHEMICAL PLANT

FIRE REPORT

PART I. (To be filled in by Supervisor of area or activity involved)

Date of Fire: _____ Time: _____ A.M.
P.M.

Exact location of fire: _____

Equipment involved (tank no., pump no., name of bldg., etc.) _____

How did the fire start? _____

How was the fire put out? _____

Description of personnel injuries: _____

Description of property damage: _____

What immediate action have you taken to prevent a recurrence? _____

Was fire protection adequate? _____

Estimate of damage: (A) 0 - \$1000 (B) \$1000-\$15,000 (C) \$15,000 +

Production delays: _____

Signed _____ Date _____ Signed _____ Date _____
(Supervisor) (Dept. Head)

PART II. (Safety Department Review)

Remarks: _____

Signed _____ Date _____
(Safety Director)

PART III. (Management Review)

Remarks: _____

Signed _____ Date _____ Signed _____ Date _____
(Plant Supt.) (Plant Mgr.)

RETURN TO SAFETY DEPARTMENT

ATTACHEMENT D

PLANT EMERGENCY

ALARM DATA SHEET

DATE: _____

TIME: _____

ALARM:
(Circle One)

Fire

Vapor

Evacuation*

Tornado**

- * Evacuation alarm must follow either the fire or vapor alarm.
- ** The tornado alarm and the evacuation alarm are the same alarm. The difference lies in the fact that the evacuation alarm by itself means a tornado is approaching. The evacuation alarm must be preceded by either the fire or vapor alarm.

LOCATION: _____

SPECIFIC NATURE OF PROBLEM

Alarm Activated By: _____