

From: KENNETH AKINS
To: ABERDEEN GROUP
Date: 1/7/00 2:01PM
Subject: ISO 14001 Environmental Goals

The ISO 14001 standard requires that progress against environmental goals be communicated throughout the organization on a regular basis. I communicate how we're doing quarterly through newsletter articles, email, bulletin board postings, etc.

Environmental Incidents

An environmental incident is one that must be reported to the government. Our goal is to have 3 or less of these in a year. In the current fiscal year (July 99-June 00) we have had one incident (VCM release from sphere in July). On a side note, we have not had a wastewater violation since January of 1999. If we complete this month without a violation, this will be the first time that we have not had at least one violation in a year in many years.

Particulate (Dust) Emissions

At least weekly, we inspect dust monitoring stations located around the plant and at our property boundaries for resin accumulation. Our goal this year is to average 75 or less particles per square inch on the detectors. Currently, we are averaging about 80. Work on compound baghouses and the dryers in vinyl recently will hopefully start showing up soon in the form of lower numbers on the detectors.

GGC000001

From: BRANDON NADLER
To: Phenol Management Team
Date: 1/20/00 3:38PM
Subject: Phenol Cooling Tower Blowdown

Supervisors,
Please review with your shifts:

As you know, we have begun analyzing the phenol cooling tower with a new analytical method (the modified 604 method) that detects phenol down to 1 part per billion. Since we have begun using this method we have learned that there is normally about 10 to 20 ppb phenol in the basin with occasional spikes to 60 or 70 ppb. We have surveyed equipment for leaks to find there is no indication of an equipment leak. We believe that these background levels of phenol are due to fugitive emissions from catching samples, isolating and decontaminating equipment, etc. that draft into the tower. One question of course has been: can we blow down the tower to the east ditch, or should we blow down to the bio-system when we see these levels of phenol? Based upon discussions with Utilities, Laboratory Services and Environmental, we should use the following guidelines.

Fugitive levels of phenol are permissible in the cooling tower blowdown. 100 parts per billion is our action point to blowdown in the unit and investigate for potential leaks in equipment. Less than 100 parts per billion may be considered normal background levels.

Known process leaks that contaminate cooling water are not permissible to blow down to the east ditch, even if the leak results in less than 100 parts per billion in the blowdown.

Please contact me if there are any questions regarding these guidelines.

Brandon

GGC000002

Georgia Gulf Corporation

TO: Doug Knittig, Ben Drone

FROM: Reed Mackay

DATE: January 25, 2000

SUBJECT: Dryer Emission Controls

I talked with Vinnolit/Krupp-Uhde last week about better dust removal from the cyclone dryers. I received a 30 page fax describing the four systems they have used on dryers. A comparison summary is given here. The information listed, except for Aberdeen's system, is for a smaller unit, about 25,000#/hr, with a lower air flow rate. These dollars are for comparison, actual costs would have to factor in inflation and scaling to 30,000#/hr rates.

	Venturi scrubber	Quad cyclones	Baghouse	Sinter lamellen filter	Aberdeen's cyclone & scrubber
Cost	\$190M	\$268M	\$168M	\$300M	\$300M
Manufacture	Mikropul	Mikropul	Mikropul	Herding	Mikropul
Efficiency mg/m ³	≤ 3 mg/m ³	≤15 mg/m ³ guarantee	≤5 mg/m ³	<1 mg/m ³	8 mg/m ³
dp	High	Med	Med	Med/low	Med
Comments	High dp, the fan would have to be changed to make this system work.	Very poor efficiency for small particles	Large foot print. bag area 1200 ft ²	Like a bag filter, Vinnolit has only used in paste resin line	

The quad cyclone is from the Plaquemine design. The emissions design was for 3.25 tons per year per dryer or 1.16 #/hr. Cyclones have the following performance characteristics:

	Pressure drop	Efficiency
Higher air temperature	lower	lower
Higher air flow rate	higher	higher
Higher PVC loading	lower	
Increased Pressure	higher	
Higher water concentration in air	lower	
Higher surface roughness	higher	lower
Higher PVC density		higher
Lower PVC particle size		lower

The baghouse design uses standard design criteria for baghouses – the air to cloth ratio is 5:1.

From: Reed Mackay
To: Drone, Ben; Knittig, Douglas E.
Date: 1/25/00 1:48PM
Subject: notes from vinnolit/krupp-uhde about dust collection systems.

notes from vinnolit/krupp-uhde about dust collection systems.

GGC000005

The answer to your question is not simple.

Or, the simple answer to your question is .0 emissions.

The cartridges in the collector are designed for 99.999% efficiency at 0.5 micron particles.

Maximum loading to the collector is 2 grains/scfm.

But your smallest particle from the HELOS Particle Size Analysis is larger than 21.50 microns.

As long as the collector runs within the design parameters, with this dust, and proper maintenance, the emissions are 0.

Is this answer acceptable?

Perry

From: Chris M. Markerson
To: AKINS, KENNETH; AUTREY, JIMMY; BEALL, JOE; Carter, Michael L.; Drone , Ben;
Hegwood, Joseph B.; Knittig, Douglas E.; KOBER, PAUL J.; MAIN CONFRM; Markerson, Chris M.;
Sneed, Rory H.; Vaughn, Amy E.
Date: 1/26/00
Time: 10:30AM - 11:30AM
Subject: Central Safety Committee
Place: MAIN CONFRM

Agenda to be E-mailed later.

GGC000007

From: NEEDHAM V. STAHL
To: Vinyl Op. / Maint.; Vinyl Shift Supervisors
Date: 1/31/00 1:10PM
Subject: Pump and Compressor Surveys

"A" Operators are responsible for the completion of the Pump and Compressor Survey sheet each night. Hold training sessions with all "A" Operators and Utilities on the how too's and what to do's. Remember only initial if seals are not leaking.

We are committed by law, to keep track of leaks from this type of equipment on a daily basis. We have a maximum of five days to try an attempt of repair to a seal that is leaking water.

I need signatures for the training. Specify what the training is for.

Thanks

GGC000008

From: Douglas E. Knittig
To: AKINS, KENNETH; AUTREY, JIMMY; Carter, Michael L.; Drone , Ben; England, Donald W.; Hegwood, Joseph B.; King, Billy G.; Knittig, Douglas E.; Mackay, Reed; Markerson, Chris M.; Miller, Daniel A.; SARGENT, SHEA P; Sneed, Rory H.; STAHL, NEEDHAM V.; Wood, Kelly D.
Date: 2/4/00
Time: 9:00AM - 9:45AM
Subject: Dusting Meeting and Minutes
Place: Trailer Conference Room

Both are attached. Please be prepared to discuss action items.

CC: BROWN, SAMUEL; KOBER, PAUL J.

GGC000009

From: Doug Knittig
To: AKINS, KENNETH; AUTREY, JIMMY; Drone, Ben; England, Donald W.; English, William C.; Hegwood, Joseph B.; King, Billy G.; Mackay, Reed; Markerson, Chris M.; Miller, Daniel A.; SARGENT, SHEA P.; Smith, Erik E.; Sneed, Rory H.; STAHL, NEEDHAM V.; Wood, Kelly D.
Date: 2/29/00 10:29AM
Subject: Dusting Minutes and Charts

Attached are the updates for the action items and the monitoring charts. Please review the items. We will meet again in a couple of weeks.

Thanks,Doug

CC: BROWN, SAMUEL; KOBER, PAUL J.

GGC000010

From: KENNETH AKINS
To: Covington Jr., Roland D.
Date: 3/8/00 11:08AM
Subject: Re: Training

1. True or False...On a piece of equipment in VC service, you only have to report a VC release from a relief valve if it is over one pound.

False, you must report any release of VC from RVs or rupture discs. The VC NESHAP prohibits RV or RD discharges.

2. Which regulation deals with environmental emission of VC to air for the vinyl unit?

A. RCRA B. CERCLA C. NESHAP D. DOT

C. NESHAP (National Emission Standard for Hazardous Air Pollutants).

3. Batch Water stripper water must be below what level of VCM before it can be opened for dumping and the water exposed to air?

A. 10 ppm B. 200 ppb C. 20 ppm D. 1 ppm

A. 10 ppm

4. The NESHAP requires that we continually monitor the incinerator stack for VCM. What is the limit we must stay under?

A. 1ppm 8 hour average B. 10 ppm 3 hour average C. 1 ppm 3 hour average D. 5 ppm 3 hour average

B. 10 ppm 3 hour average

5. When a GC picks up a leak in the unit, someone goes out and finds a valve leaking. How long do we have to make a first attempt at repair?

A. 24 hours B. 5 days C. 15 days D. next shutdown

B. 5 days

6. If the leak can't be stopped on first attempt at repair, how long do we have to get it fixed?

A. 24 hours B. 5 days C. 15 days D. next shutdown

C. 15 days

7. What is our biggest source of complaints from the community?

A. Smell from ponds

B. Noise

C. Lights at night

D. Resin on their cars

D. Resin on their cars

If you need more, just let me know.

GGC000011

From: Chris M. Markerson
To: AKINS, KENNETH; ANDREWS, FRANKLIN; AUTREY, JIMMY; BAGWELL, AMY; BEALL, JOE; CALDWELL, WILLIAM (BILL); CARROLL, WILLIAM (Steve); Carter, Michael L.; Covington Jr., Roland D.; Davis, William J.; Drone, Ben; Gathings Jr., Dave; Harlow, Jimmy R.; Hegwood, Joseph B.; Hillman, Steve C.; Honeycutt, Larry D.; Howell, James O.; Hull, John D.; King, Billy G.; Knittig, Doug; KOBER, PAUL J.; LANGFORD, MICHAEL G.; Markerson, Chris M.; Miller, Daniel A.; Noland, Terry L.; PERRY, DARNELL; PLUNKETT, DAVID E.; Reynolds, Richard T.; SARGENT, SHEA P; SHIELDS, JEFFERY C.; SIMMONS, DAYTON F.; STAHL, NEEDHAM V.; STRICKLAND, RODNEY B.; Swierc, Michael A.; Vaughn, Amy E.; WELLS, PATRICIA A.; Williams, John R.
Date: 3/9/00 5:23PM
Subject: April Safety Training Dates

The safety training dates for April have changed from those previously published. The new dates are as follows:

April 12, 18,19,25, and 27.

Each daily session will begin at 8:00 a.m. and end at approx. 12:00 p.m.

Please communicate these dates to the employees in your area so that they can plan to attend. This training is required for all employees.

GGC000012

From: NEEDHAM V. STAHL
To: KING, BRIAN K.; Vinyl Op. / Maint.; Vinyl Shift Supervisors
Date: 3/22/00 10:24AM
Subject: Dust Mask

PPE requirements on dust mask type are changing in the in the Vinyl Department. The yellow desposable mask will no longer be used. All operators will have a choice of wearing their personal full face respirator with a HEPA cartridge or a 3M 6000 series half face dust mask. The 3M mask have two, Pink in color, desposable filters connected on the sides. Make sure all outside operators are issued one of the 3M 6000 series mask. The 3M mask and both type of filter replacements are stock items in the storeroom, in the free bin area. Make sure everyone is aware of this and e-mail me with the names of everyone on your shift that was issued a mask.

Thanks

CC: Knittig, Doug; Markerson, Chris M.

GGC000013

From: MICHAEL G. LANGFORD
To: STAHL, NEEDHAM V.
Date: 3/23/00 12:16AM
Subject: Re: Dust Mask

Needham I issued Chris White , Jerry Owens , Tim Hargrove , Rickey Hollis
a 6200 3m mask. Willie Jackson sick will take care of him when he returns.
Thank you Mike

>>> NEEDHAM V. STAHL 03/22/00 10:24AM >>>

PPE requirements on dust mask type are changing in the in the Vinyl Department. The yellow
desposable mask will no longer be used. All operators will have a choice of wearing their personal full
face respirator with a HEPA cartridge or a 3M 6000 series half face dust mask. The 3M mask have two,
Pink in color, desposable filters connected on the sides. Make sure all outside operators are issued one
of the 3M 6000 series mask. The 3M mask and both type of filter replacements are stock items in the
storeroom, in the free bin area. Make sure everyone is aware of this and e-mail me with the names of
everyone on your shift that was issued a mask.

Thanks

GGC000014

From: Michael L. Carter
To: BAGWELL, AMY; Carter, Beverly S.; COX, MICHELLE; Harlow, Jimmy R.;
Honeycutt, Larry D.; Swierc, Michael A.; Walters, Kimberly W.; Williams, John R.
Date: 3/27/00 2:50PM
Subject: Fwd: April Safety Training Dates

Please see attached email from Chris on April Safety training. I think most of you were copied but I wanted to emphasize the importance of the training. This is required for all employees. The subjects covered will be VCM, emergency plan, safe work permits, fire extinguisher hands on (ladies you may want to where pants - jeans on this day) , and yard only - fork trucks. Please pass this on to all your folks - again required for all employees.

Michael

GGC000015

From: JIMMY AUTREY
To: Drone , Ben; Hegwood, Joseph B.; Knittig, Doug; KOBER, PAUL J.; Markerson, Chris M.
Date: 3/29/00 11:17AM
Subject: Mx Dept HAZOP Work Assignment Meeting Minutes

Item 3 - Ventilation - Automatic shutdown of the air intake to the Vinyl CR - DAM and WCE believe that this is already there, but are not sure what the setting is. WCE is to follow up. **No progress**

Item 4/5 - Ventilation - Sub 7/9 air intrusion - WCE is to follow up and write work requests to repair. **No progress**

Item 6 - Dow Fire & Explosion - Contractor Shed relocation - DAM seemed to recall that the reasoning for not moving it was all the mitigation that is in place on the propane bullets, that reduces the possibility of a vapor cloud explosion, therefore reducing/eliminating the need for relocation. If this is correct, I will write a letter to file stating such. **More discussion took place on this item and due to no response from any of you on the above question, I will issue a letter to PJK and to file stating our convictions that the contractor shed need not be relocated.**

Item 27 - Direct Ignition Sources - VC Tank Farm electrostatic review - WCE will look into the feasibility of an every five-year test on the grounding grid in that area. He and DAM will also write PMs to annually perform a visual inspection of ground connections in that area. **WCE has obtained some initial information on grounding requirements that will be included in the PMs.**

Item 33 - Pressurized storage safe operation checklist - level indication - there is confusion on what is being addressed/recommended here. DAM to research and follow up. **A letter will be issued to PJK and to file stating our conviction that no further work is necessary here.**

Item 41 - Fire Protection Systems - Verify fireproofing to Conoco X-4 - JAS to research and follow up. **JAS has reviewed X-4 and conducted a visual field audit and determined we are in compliance with this standard. He will issue a letter stating that fact and I will attach with a cover letter.**

We will communicate further progress and findings as they become available. Please contact me if you have any further questions.

CC: English, William C.; Miller, Daniel A.; Seaver, Jeffery A.

GGC000016

From: SAMUEL BROWN
To: Sneed, Rory H.
Date: 4/7/00 10:09AM
Subject: LINE 1 & 2 125HP GRANULATOR MOTOR

We need to discuss the problem we have with dust / product getting into these motors . This is a major problem with these motors , we pulled Line One motor during the outage because of wear to the commutator due to excessive amounts of material inside of the motor.

CC: AUTREY, JIMMY

GGC000017

From: Doug Knittig
To: AKINS, KENNETH; AUTREY, JIMMY; Drone, Ben; England, Donald W.; English, William C.; Hegwood, Joseph B.; King, Billy G.; Knittig, Doug; Mackay, Reed; Markerson, Chris M.; Miller, Daniel A.; SARGENT, SHEA P; Sneed, Rory H.; STAHL, NEEDHAM V.; Wood, Kelly D.
Date: 4/18/00
Time: 12:00PM - 12:45PM
Subject: Dusting Meeting - Moved up One Hour (rescheduled) - **Cancelled**
Place: The Trailer Conference Room

I will reschedule next week. We have meeting conflicts today. Sorry for the inconvenience.

Attached are the minutes (update) from the last meeting and a brief agenda. We need to discuss capital projects to address the issues or tests to develop capital projects. The tie-in window will be in December of this year.

Thanks, Doug

CC: BROWN, SAMUEL; KOBER, PAUL J.

GGC000018

From: JIMMY AUTREY
To: Drone, Ben; Hegwood, Joseph B.; Knittig, Doug; KOBER, PAUL J.; Markerson, Chris M.
Date: 4/18/00 1:55PM
Subject: Mx Dept HAZOP Work Assignment Meeting Minutes

Item 3 - Ventilation - Automatic shutdown of the air intake to the Vinyl CR - **Performed test on system. Air handling unit shutdown at 45% LEL, however pressurization blower continued to run. More investigation required. WCE**

Item 4/5 - Ventilation - Sub 7/9 air intrusion - **List has been compiled. Orders will be input and scheduled as soon as possible. WCE**

Item 6 - Dow Fire & Explosion - Contractor Shed relocation - **Letter issued. We consider this item to be complete.**

Item 27 - Direct Ignition Sources - VC Tank Farm electrostatic review - WCE will look into the feasibility of an every five-year test on the grounding grid in that area. He and DAM will also write PMs to annually perform a visual inspection of ground connections in that area. **These PMs are being entered into the system. WCE/DAM**

Item 33 - Pressurized storage safe operation checklist - level indication - there is confusion on what is being addressed/recommended here. DAM to research and follow up. **Letter issued. We consider this item to be complete.**

Item 41 - Fire Protection Systems - Verify fireproofing to Conoco X-4 - JAS to research and follow up. **Letter issued. We consider this item to be complete.**

We will communicate further progress and findings as they become available. Please contact me if you have any further questions.

CC: BURKS, SUSAN; English, William C.; Miller, Daniel A.; Seaver, Jeffery A.

GGC000019

From: NEEDHAM V. STAHL
To: KING, BRIAN K.; Vinyl Op. / Maint.; Vinyl Shift Supervisors
Date: 4/19/00 7:24AM
Subject: Quarterly Bleeder Surveys

As you all know the Co-ops check all bleeders that have the potential to have VCM emissions once every three months. We receive a list of the leakers and bleeders that are not properly plugged. The problem that we have is that the same bleeders keep having the flat caps or plugs missing or illegal hose connections installed in the bleeders. They seem to be the same ones over and over, usually around the ERS, dump and feed pumps, and on strainers and filter packs. How much extra time does it take to set equipment up properly after you take it out of service? How much trouble is it to remove hose fittings when you are through with them? Can you do better? Yes, you can and you have too.

GGC000020

From: Doug Knittig
To: AKINS, KENNETH; AUTREY, JIMMY; Carter, Michael L.; Drone, Ben; England, Donald W.; Hegwood, Joseph B.; King, Billy G.; Knittig, Doug; Mackay, Reed; Markerson, Chris M.; Miller, Daniel A.; SARGENT, SHEA P; Sneed, Rory H.; STAHL, NEEDHAM V.; Wood, Kelly D.
Date: 4/28/00
Time: 8:00AM - 8:45AM
Subject: Dusting Meeting
Place: Trailer Conference Room

This is the rescheduled meeting.

CC: BROWN, SAMUEL; KOBER, PAUL J.

GGC000021

From: Doug Knittig
To: AKINS, KENNETH; AUTREY, JIMMY; Carter, Michael L.; Doug Knittig; Drone, Ben; England, Donald W.; Hegwood, Joseph B.; King, Billy G.; Mackay, Reed; Markerson, Chris M.; Miller, Daniel A.; SARGENT, SHEA P; Sneed, Rory H.; STAHL, NEEDHAM V.; Wood, Kelly D.
Date: 6/7/00
Time: 8:00AM - 8:45AM
Subject: Dusting Meeting
Place: Trailer Conference Room

Attached are the Agenda and the last minutes.

CC: BROWN, SAMUEL; KOBER, PAUL J.

GGC000022

From: NEEDHAM V. STAHL
To: KING, BRIAN K.; Vinyl Op. / Maint.; Vinyl Shift Supervisors
Date: 6/15/00 9:55AM
Subject: Dusting

We must be dust free. See the attached tracking of incident sheets.

GGC000023

CORRECTIVE ACTION REPORT (CAR)

CAR No. CAR-00-06-398

Originator: CINDY OCMAND
Department: CUSTOMER
Report Date: 6/27/00
Originator: (225) 685-1296

1.) NATURE OF NONCONFORMANCE

A) Description:

Rail car number PTLX 41611 leaking. Order number 163599 line 15 Credit to be issued for 1,000 lbs.
Of product. OrderNum:163599 OrderDate:6/20/00 ShipTo:HEARTLAND BUILDING INC.
ContainerType:RAIL CAR ContainerNum:

B) Suggested Corrective Action (Optional):

N/A

C) ISO Element:

4.14 - Corrective and Preventive Action

D) Problem Id Code:

9 - Railcar leaking

2.) ACCEPTANCE OF CAR BY DEPARTMENT MANAGER

Assigned To: MIKE CARTER

Assigned Date: 7/24/00

Accepted

Rejected

Comments:

Sub-Assignment(s):

3.) ROOT CAUSE FOR THE NONCONFORMANCE(S)

List below, and attach supporting documents

Leak developed in transit on railcar. Railcar was temporarily repaired on customer site. Credit was given to customer for product loss.

4.) CORRECTIVE ACTION TO BE TAKEN

A) Description:

N/A

B) Suggested Indicator for Measuring Effectiveness:

Other indicators not covered by above reasons.

C) Estimated Completion Date: 10/19/00

Send To Lead Assessor

5.) VERIFICATION OF CORRECTIVE ACTION TAKEN

Action Taken Action Taken Date:

Verified By:

6.) SHOULD PREVENTIVE ACTION BE INITIATED?

(TO BE DETERMINED BY DEPT. MANAGER)

YES - Submit CAR To Lead Assessor, and
Continue on Form 14B (PAR)

NO - Submit CAR To Lead Assessor

7.) EVALUATION OF CORRECTIVE ACTION

(TO BE DETERMINED BY AUDITOR)

EFFECTIVENESS

Comments:

YES - Effective

NO - Not Effective

Auditor's Name:

Evaluation Date:

8.) REPORT CLOSURE

Closed By:

Closed Date/Time:

GGC000025

GEORGIA GULF CHEMICALS & VINYLs, LLC
ABERDEEN PLANT
SAFETY & HEALTH MANUAL

Subject: **General Safety Rules**

Code: ASHP 1.1 Revision: 5 Effective: July 1, 2000

Approved By: **CMM Signature on File** Safety & Health Manager

Approved By: **PJK Signature on File** Plant Manager

I. PURPOSE

This policy is to communicate the basic rules for safety within the Georgia Gulf Chemicals & Vinyls, LLC Aberdeen Plant. As these are the basic safety requirements, additional rules, requirements, and precautions may be needed based on the work to be performed.

II. SCOPE

These General Safety Rules apply to all persons entering the Georgia Gulf Chemicals & Vinyls, LLC Aberdeen Plant, including employees, contractors, visitors, and vendors.

III. POLICY

The General Safety Rules are as follows:

- All personnel shall work to support the plant's Safety and Health Policy (VSP 1) and Georgia Gulf Chemicals & Vinyls, LLC's corporate Safety and Health Policy.
- All personnel shall comply with the "Rules of Conduct" as issued by the Plant Manager.
- All persons working within the plant shall report and work to correct all unsafe conditions.
- No one shall operate any equipment without proper authorization and/or training.

III. POLICY - Continued

- As a minimum, all personnel must wear long pants, leather shoes, and shirts with sleeves while in the plant's operating areas. Additional requirements are noted in the "Plant's Safety Shoe Program" (ASHP 11), "Safety Glasses Policy" (ASHP 12), "Fire Retardant Clothing" (ASHP 28), and "Personal Protective Equipment Policy" (ASHP 35).
- Eating, beverage consumption, and the application of cosmetics shall be limited to approved areas only.
- All persons shall work to maintain plant facilities. This includes the use of good housekeeping practices.
- All splashes or spills of chemicals onto persons must be flushed immediately with water. Chemical spills are to be cleaned up, reported to the area supervisor, and the cause corrected as soon as possible.
- Appropriate signs and barricades shall be used to warn personnel of potential hazards. Barricade tape shall be used as follows:

+ Red DANGER - DO NOT ENTER

Used where access is restricted only to persons directly involved in the job.

+ Yellow ENTER WITH CAUTION

Used to warn of potential hazards; persons can enter, but with high awareness.

Safety signs are generally installed under the guidance of the Safety Department. Safety signs should be removed only with the approval of the Safety Department.

- Proper lifting techniques shall be used for all lifting performed in the plant. Back supports are available for all Georgia Gulf Chemicals & Vinyls, LLC employees and are encouraged.

III. POLICY - Continued

Subject: General Safety Rules

Code: ASHP 1.1

Revision: 5

Effective: July 1, 2000

Document is uncontrolled unless one of the following appears. Red Stamp stating "Controlled Document" or Blue "Controlled Copy" on the right margin of the page.

GGC000027

- Vehicle speed limit is 15 mph on all plant roadways. Vehicle traffic in operating units is allowed by permit only. Vehicles shall obey all traffic signs and shall yield to pedestrians.
- All persons who have been working in maintenance and operating areas shall wash their hands before consuming foods and beverages prior to leaving work for the day.
- Only approved facilities shall be used as a restroom.
- Plant ladders shall be inspected routinely and cared for as per the "Portable Ladder Procedure" (ASHP 4.1).
- Plant hoses and couplings shall conform to the "Plant Hose Standard" (ASHP 19).
- Running is not allowed in the plant except in emergency situations.
- Proper tools and equipment for the job are to be used.
- All injuries shall be reported promptly.
- All injured persons requiring medical attention and follow-up by a doctor shall be accompanied by a plant representative as determined by the plant.
- In offices, file cabinets shall remain closed when not in use and only one drawer is to be opened at one time.
- Offices shall be maintained clutter-free to allow easy access in walkways.
- Bicycles are allowed in approved areas only. When riding bicycles, all traffic signs shall be obeyed. Both hands are required to be on the handlebars.

III. POLICY - Continued

- Golf carts, "Gators", or other motorized carts are approved for use in the

Subject: General Safety Rules

Code: ASHP 1.1

Revision: 5

Effective: July 1, 2000

Document is uncontrolled unless one of the following appears. Red Stamp stating "Controlled Document" or Blue "Controlled Copy" on the right margin of the page.

GGC000028

warehouse by permit only. A Safe Work Permit is required to operate this type of equipment in the warehouse.

- Golf carts, "Gators", or other motorized carts are approved for use only on designated plant roadways. Use of carts/gators in operating units, walkways, or other areas not intended for vehicle traffic shall require a Safe Work Permit.

Subject: General Safety Rules

Code: ASHP 1.1

Revision: 5

Effective: July 1, 2000

Document is uncontrolled unless one of the following appears. Red Stamp stating "Controlled Document" or Blue "Controlled Copy" on the right margin of the page.

From: SAMUEL BROWN
To: Drone, Ben
Date: 7/18/00 6:41AM
Subject: Re: New VCM Meters

We usually replace these meters on a shutdown.

>>> Ben Drone 07/17/00 09:57AM >>>
Is the VCM meater problem a near miss from a safety stand point??

The HAZOP team recognized the intrument failure as a potential problem but unlikely to occur. Protection is provided through low flow SD and high pressure SD. In the furure, we could have a High Level SD when we get level indication on reactors.

The checking of these meters should occur everytime we SD the module every other year as a minimum.

Maybe we should get the mass flow meters!!!!
I think that the accuracy of charge would improve and the optimization of the SA, anti foam, anti oxidant, and short stop would be easier.

>>> SAMUEL BROWN 07/14/00 05:22PM >>>

1) We can only change the K factor of the meter in the DCS which is a number sent with each new set of meter blades. Can we be positive that they read the same as the old one's did , no we can not. We can only watch the level in the receiver and see if the level changes the same when we charge a RX.

2) The blades seldom break, what usually happens is something gets in the line and goes thru the meter causing the blade to break off. We think that when the first meter lost blades, from what ever happened, they went on down line and took out the blades in the second meter.

>>> Doug Knittig 07/14/00 07:25AM >>>

How do we know they are reading the same as the old ones? Do the fins break on a regular basis?

GGC000030

SHEA P SARGENT
Covington Jr., Roland D.; Hull, John D.; King, Billy G.; LANGFORD, MICHAEL G.;
Markerson, Chris M.; PERRY, DARNELL; PLUNKETT, DAVID E.; SHIELDS, JEFFERY C.; STAHL,
NEEDHAM V.; STRICKLAND, RODNEY B.
8/2/00 7:53AM
Respiratory Protection training

A point that I didn't exactly make clear in the training materials and would like for you to convey in the respirator training, is that the 3M disposable dust masks are not to be used for nuisance dusts in the Vinyl area. The 3M 6000 series is the respirator that should be used to give protection from dusts in this area. For the most part, the 3M disposable is only used in Compound.

Vinyl Supervisors: Make sure that everyone that you train demonstrates that they can operate and use a Scott Air Pak (hands-on)

Thanks,

Shea

GGC000031

From: JIMMY AUTREY
To: Knittig, Doug
Date: 9/20/00 2:19PM
Subject: Re: Dust into Rost

I agree. Pick a good time for you and we will talk about it with him.

>>> Doug Knittig 09/20/00 10:00AM >>>

I think we have done most of what the Dusting team wanted to accomplish as far as working on short-term fixes. I want to move the few dusting items back into the Rost team and we will cover spills etc in that meeting.

I think we need to talk to Don about this so he does not think we are stopping work. The next major step is the dryer turning vane \$\$, vacuum system \$\$, and mist eliminator work \$\$\$. We are working on all of these but the team cannot help at this point.

Thanks, Doug

GGC000032

Michael L. Carter
Carter, Beverly S.
9/25/00 11:31AM
Re: RVCM Test--EPA 107

Please come by and lets discuss. I am in all week. I do have meetings today 2:00 - 4:00. No meetings as of yet on Tuesday.

Michael

>>> Beverly S. Carter 09/20/00 08:42AM >>>

Michael, I don't know if Richard informed you or not of the response we received from EPA concerning the use of alternative procedures for Method 107. We have been granted the option to determine % solids on a yearly basis, unless other changes occur. They suggested that we eliminate the 2000 & 4000 ppm standards and use 5, 50, and 500 ppm standards. I propose that we use 5, 50, 500 and 1000 ppm standards because we have exceeded the 500 ppm concentrations at times on in-process samples. I have informed Kenny and Richard and I will make all of the necessary changes to the spreadsheet and procedures. The other two proposals were eliminating the refrigeration requirement of water samples and slurry samples if analyzed within 24 hours. The maximum hold time was extended to 5 days.

Thanks,
Beverly

GGC000033

To: Shift Supervisors

From: Needham Stahl

Date: October 6, 2000

Subject: **Leak Detection and Elimination Sheet #3**

office
communication

As you all should know by now, the Leak Detection Sheet has been updated. If one reading on any station at or above 5 PPM has to be documented. If there is a leak and it continues while trying to find it, any document once. The problem that we are having is that some of the readings are not being written down and the biggest problem is that we are not following up and completing the forms. We like to lay blame on others but right now we need to clean our own doorsteps, look at what we are doing.

Here are some guidelines to try to follow, I'm not saying they are correct on every occasion but let's try them anyway:

- 1) Have operators (Yard or Vinyl) find readings when receiving alarm.
- 2) Document each leak (5 PPM and over).
 - A) Fill out date and time in first column.
 - B) Stay consistent with leak numbering in second column.
 - C) Fill out GC stream number (same as on DCS).
 - D) Fill out GC readings (same as on DCS).
- 3) Fill out leak location (Actual leak location).
- 4) Fill out HNU readings (sixth column).
- 5) Fill out the "Was Notification Written" column (Yes or No). If "Yes", fill-in Notification number.
- 6) "What Repairs Were Made" column.
 - A) This is a repair to fix the problem (mechanical).
 - B) Notified yard and closing valves are unexcitable.
 - C) Do not refer to other leaks, they are already suppose to be repaired. If it is the same location, write a new notification.
 - D) If no leak can be found, put the field operator's name (not initials) in this block with the comment.**
- 7) The "Repaired Date:", "Repaired By:", and "Repair Verified By:" columns are for the person(s) that checks the equipment repair and puts it back into service.

Hopefully we can all get to filling this out the same way each time which will stop a lot of

GGC000034

confusion that we seem to have at times.

From: Michael L. Carter
To: QUINT, PAT
Date: 11/28/00 7:49AM
Subject: NAHX 581340

Pat this is the car I talked to you about Monday morning, which Bobby Richie called from KCS conveying that they had spotted a leak located on the B end lower left outlet tube to hopper weld. He also commented that he could not find any documentation indicating an accident or derailment for this car and that it probably was damaged on another railroad. He said they had caulked the crack and it was not leaking. I believe this cars final destination is UDC.

Bobby called late Monday night and left message that he had not heard from anyone concerning the disposition of this car. Again, per our conversation we have not called the CSR based on not knowing the final outcome.

Michael

GGC000036

From: Michael L. Carter
To: Jakel, Mark G.
Date: 12/1/00 3:27PM
Subject: Re: VCM Railcars

Thanks for the feedback. A couple of questions, I believe this the series of cars which have 90 degree ball valves. Did this car have the mechanical stop in place as to not allow the valve to move 180 degrees, i.e. past the close position? Also, which valve was not secure - liquid or vapor. Which plug was loose? I am pulling the checklist on our end and will discuss with operators.

Thanks again for the feedback

Michael

>>> Mark G. Jakel 11/30/00 10:02AM >>>

Mike,

We had a railcar, UTLX 901325 that came into the plant (11/23) leaking through one of the valves and plug inside the dome. The operators found the plug to be only finger tight (it was very loose) And the valve was not fully closed. This car last left Aberdeen on 11/17. Upon questioning a few of our operators, they indicated that in the past month they've noticed several cars coming back from Aberdeen with loose plugs. Until this past month the railcars have been arriving with secured plugs and valves. This is the first car in a long time to arrive leaking. Let me know if you need any additional information.

Mark

GGC000037

From: JAMES WORRELL
To: G3DOMAIN.Aberdeen.BEALLJ, HAGERJ, G2DOMAIN.PLAQUEMINE
ENV.WAGUESPACKB, G2DOMAIN.PLAQUEMINE ENV.SCIAMBRAJ
Date: 12/21/00 7:43AM
Subject: Support for the new OSHA Ergonomics Program

As you may have read, OSHA has established a new program that will require employers to do a variety of things to identify and abate musculoskeletal disorders (MSD) that occur to employees. While the responsibility to design and carry out the program falls to the Health and Safety group, the HR function can help and will need to carry out our responsibilities as defined by the GGC program when developed.

The summaries I have seen lead me to believe that the company program will impact HR in several areas where we can help Safety and Health implement the program. These include employee training about MSDs, employee communication, and communication with new hires. Additionally, we may be able to assist in the process of dealing with light-duty assignments and coordination with STD, workers comp, FMLA, and ADA.

I realize this memo is very broad but I wanted to alert you to this new provision. I am sending you by fax a summary that I have seen that I found useful.

Let me know if and when you get any contact or requests for help from the Safety group so that we can coordinate our resources. It may be some time yet as the new standard does not have to be implemented for several months yet.

Thanks, James.

GGC000038

From: Michael L. Carter
To: Honeycutt, Larry D.
Date: 12/22/00 9:51AM
Subject: VCM at tankfarm

Please look at the dates 19 - today at the old side. PIMS continues to show all kinds of readings. Maybe a leak which the wind is blowing?? We definitely have something going on down there.

Michael

GGC000039

From: NEEDHAM V. STAHL
To: Vinyl Op. / Maint.; Vinyl Shift Supervisors
Date: 1/4/01 9:46AM
Subject: Pond Resin

We ran for a while with out any material going to the ponds. We try to help the dusting problem and install water on #11 overflow shutes. Now for the past 3 to 4 weeks, I hear every day that we are putting material to pond #1 again. Where is it coming from? Can it be stopped?

The Lo-Mo dump sweco in the New Unit may be putting some on the ground, but where was it coming from while these reactors were down? This just happens to be the last thing written up on the Pond Resin Sheet on December 4, 2000.

Let me know if you need help eliminating this again, I know some engineers would love to hop on a good riding wagon.

GGC000040

From: Michael L. Carter
To: Jakel, Mark G.
Date: 1/19/01 12:33PM
Subject: Re: Railcars

Thanks for the feedback, I am investigating today. On GATX 90231, reading the email I assume that the valve was not a ball valve but a plug - is this correct?

Michael

>>> Mark G. Jakel 01/19/01 11:24AM >>>

Mike,

We had two railcars come into the plant this past week with loose plugs and one had a leaking valve (valve was not completely shut). GATX 90231 had a vent valve that was leaking through and the plug was only finger tight. We discovered the leak when the car came in and tripped our fixed point monitor. The valve handle was closed about 1/16 of a turn to seat off the valve and stop the leak.

GATX 90246 had two plugs only finger tight (liquid and vapor); however, there were no leaks.

Since the last notice I had sent to you regarding the loose plugs the operators have reported that most of the cars are being returned with the plugs tight; however, there seems to be a few that have arrived with loose plugs.

The leak was calculated to be less than an RQ for vinyl, but we are always very concerned with any railcar leak since it doesn't take much of a leak to be above the RQ.

Mark

CC: FONTENOT, GLYNN; Fruge, Archie P.; Little, James A.

GGC000041

From: NEEDHAM V. STAHL
To: Vinyl Op. / Maint.; Vinyl Shift Supervisors
Date: 2/9/01 8:49AM
Subject: Filters

When VCM and Seal Water Filters are recovered, we are suppose to follow procedures. These procedures state that the filters are to be checked with a HNu meter and desposed of properly. Well properly is the trash dumpster if less than 5 PPM and in a lined gaylord box when 5 PPM and greater so they can be treated as hazardous waste. If you have any to put in boxes, lable the box as hazardous watse and contact Kenny Akins (E-mail, phone,etc.) to let him know that we have the box for desposal.

Kelly, this was a ROST action item that you can remove now.

CC: Wood, Kelly D.

GGC000042

From: BRANDON NADLER
To: HEBERT, BRETT; Phenol Management Team; VENDT, FRANK
Date: 2/20/01 4:10PM
Subject: Fwd: Release Reporting

FYI---

Revised interpretation of reporting requirements.

If it touches the ground it is a release to the environment.

We still are obliged to recover, pick up, clean up, remediate, etc.

Please see the attached memo.

Brandon

GGC000044

From: NEEDHAM V. STAHL
To: Vinyl Op. / Maint.; Vinyl Shift Supervisors
Date: 2/27/01 9:14AM
Subject: Leak Detection Sheets

What will it take for us to get our heads out of you know where? Can it be accomplished? I don't understand how each of you think or what you think about when you are here alone to run the operations.

I think that I have made it clear what your responsibilities are as a Supervisor. (Each of you are responsible for your shift personnel and all occurrences that take place or doesn't take place on your shift. I expect each of you to follow all guidelines, rules, policies, laws, etc. that affect us and the way that we are to perform as Supervisors.) A very good example, see the attached, how many people follow this?

It is time for me to make a change. I will expect each of you to run your shift, have total control, as you are the supervisor not a messenger. I expect you to know what happens on your shift including quality of the material, performance of the operators, status of equipment, all safety and environmental issues. I expect each of you will be able to explain all occurrences on your shift to me and others when necessary.

You are the supervisor. You are responsible. You will have to work together. Is there another way to explain????

If you would like to discuss, see me.

GGC000045

From: Daniel A. Miller
To: Markerson, Chris M.
Date: 3/5/01 10:40AM
Subject: BP Machine

Chris,
Several Weeks ago I asked you about the BP machine and you told me there was a WO in to repair it. There is and MARCAM shows that a receipt was done and an invoice paid on 2/07. I tried the machine today and it still has a leak that sounds like its in the cuff. Did anyone see these people come in and try to fix our unit?

Dan Miller

GGC000046

From: Michael L. Carter
To: Honeycutt, Larry D.; Sneed, Rory H.; Somers, Terry J.
Date: 3/9/01 7:41AM
Subject: Re: GATX 32310

I did not catch who the vendor was? I thought we changed vendors some reason and thought this problem had been resolved. Just a note - ever time we plug lines we spend money out of the storeroom. I would like to talk with them if possible and get a copy of their procedures for railcar maintenance prior to loading. Please let me know.

Michael

>>> Rory H. Sneed 03/08/01 04:59PM >>>

Terry, would you please call Bill Monihan and let him know that we're having problems again? I think we need to get him involved to get anything resolved here. Thanks.

>>> Terry J. Somers 03/08/01 04:32PM >>>

I called them and told them the problem. They said that they would shop it when it returned. As far as the other comments that Dean made...I don't know enough about the system to talk about it. BASFs number is (800) 533-8966. Anyone can tell you who you need to contact.

>>> Rory H. Sneed 03/08/01 04:30PM >>>

Is this BASF or Stepan? Have you heard from them yet?

>>> Terry J. Somers 03/08/01 10:56AM >>>

I'll contact supplier.

>>> Larry D. Honeycutt 03/08/01 10:53AM >>>

PA R/C UNLOADED ON 3/07 AND DOMELID GASKET LEAKED PLUGGING THE UNLOAD LINE. HAD TO UNHOOK AND GET NEW LINE AND FITTINGS TO RESTART. FINALLY DID UNLOAD BUT THIS IS CONTINUING PROBLEM WITH PA R/C DOMELID GASKETS. ALL PA R/C'S ARE SUPPOSE TO HAVE NEW GASKETS INSTALLED EACH TIME LOADED BUT WE HAVE A PROBLEM BELIEVING THIS IS DONE.

GGC000047

From: Michael L. Carter
To: Honeycutt, Larry D.; Somers, Terry J.
Date: 3/15/01 3:27PM
Subject: Re: UTLX 650631 PA R/C

Terry, I could not find the number for the loading area. Is it possible for you to get the number for me? I feel its time to talk to the loading area.

Michael Carter

>>> Larry D. Honeycutt 03/15/01 02:58PM >>>

THE SUPPLIER NEEDS TO CHANGEOUT THE GASKET BETWEEN THE UNLOAD VALVE AND THE R/C BODY. WE HAD A SMALL LEAK FROM THE GASKET AREA AND COULDN'T STOP BY TIGHTENING THE STUD BOLTS. MUST BE CHANGED OUT BEFORE RE-LOADING. WE WILL BE ABLE TO UNLOAD THIS TIME.

CC: Sneed, Rory H.

GGC000048

From: NEEDHAM V. STAHL
To: Vinyl Op. / Maint.; Vinyl Shift Supervisors
Date: 3/21/01 9:00AM
Subject: Dusting

Congradulations!!!!!!

We haven't put any resin on the ground or dusted in the air since the last part of January. If you don't believe me just look at the attachment, no dusting sheets turned into me so no problems since January 28.

HOPE THIS IS CORRECT. WE HAVE A MEETING TO DAY AND ALL WILL SEE THIS SHEET.

GGC000049

Table II.

Dust Personal Sampling Results				
Aberdeen Chemical Plant (Nov-Dec '99)				
Area	Date	Job Activity	Sample Type	Results (mg/M ³) ¹
Vinyl Dryer Area	11/16/99	A Operator- Dryer	Total	0.52
	11/16/99	A Operator- Dryer	Respirable	0.14
	11/17/99	A Operator- Dryer	Total	0.84
	11/17/99	A Operator- Dryer	Respirable	0.12
	12/16/99	A Operator- Dryer	Total	6.47
	12/16/99	A Operator- Dryer	Respirable	0.05
	12/17/99	A Operator- Dryer	Total	0.13
	12/17/99	A Operator- Dryer	Respirable	0.37
Yard	11/16/99	Yard A Operator	Total	0.96
	11/17/99	Yard A Operator	Respirable	0.1
	12/16/99	Yard A Operator	Total	0.13
	12/17/99	Yard B Operator	Respirable	0.03

¹ milligrams of dust per cubic meter of air sampled

* The OSHA-PEL is 15 mg/M³ for total dust and 5 mg/M³ for respirable dust

note: ACGIH Threshold Limit Values (TLVs) : 10 mg/M³ for total dust and 3 mg/M³ for respirable dust

From: Daniel A. Miller
To: Doug Knittig
Date: 3/20/01 3:27PM
Subject: Re: Dump Tank Seal

Even if we are still not sure if it was VCM I think we may have some issues we might need to discuss. I looked at the PI&D of the Dump and Feed Tank seals.

They have check valves which should, if they are soft seated check valves, prevent anything from backing up into the bottle. Even if they are not it seems like it would be difficult for the VCM to displace the gas in the bottle unless the bottle itself had a leak.

I thought the bottle or the piping to the seal had a low pressure switch. They do not. The low pressure switch near the seal bottles is for the AMS pots. The seal oil pot has a low level switch which if there is a leak would alarm when the N2 blew all of the oil somewhere, either in the tank or outside the seal housing.

The seals per the NESHAPS regulation require one of two methods for sealing VCM from the atmosphere. They must have double seals with either higher pressure barrier fluid or a secondary containment with some type of alarm to notify of a leak situation. We have three ways of doing this; 1. Double seal w/ high pressure service water as a barrier fluid (like all of our pumps and compressors in the vinyl areas) 2. Double seal with a pressurized barrier fluid higher than the process (aka the dump and feed tank seals which use the N2 to pressurize the oil), or, 3. Double seal with a tandem arrangement and low pressure from the ERS system and a high pressure switch to notify of a leak (like the VCM transfer pumps at the sphere).

I think the pressurized system that we have is the most economical system however if we want double redundancy or a backup alarm we may want to look at adding a low pressure switch.

Please let me know if I can help in any way with this.

>>> Doug Knittig 03/20/01 01:21PM >>>

We received a nitrogen bottle that we had sent back as empty. When going to refill the bottle had pressure and some "liquid" that froze. We are testing the bottle to verify if it is VCM. If it is, the only place we have thought of that could let VCM back to a bottle is the dump tank seal. Is this possible, and if so could we do something different to eliminate the bottle?

Dan Miller

CC: AUTREY, JIMMY

GGC000051

From: SHEA P SARGENT
To: Covington Jr., Roland D.; LANGFORD, MICHAEL G.; PERRY, DARNELL; SHIELDS, JEFFERY C.; STAHL, NEEDHAM V.; STRICKLAND, RODNEY B.; WHITE, CHRISTOPHER T
Date: 3/27/01 3:45PM
Subject: Nuisance dust respirators

Questions have come up concerning the 3M 6000 series half-face respirators used for nuisance PVC dust. It seems that for some employees fit and comfort of this respirator has become an issue (which can be expected due to various face shapes and sizes). If you could let your operators know that if they have an issue with the 3M 6000 series half-face respirator, the 3M 8233 N100 dust mask (found in the storeroom free bin area; one per bag) is a sufficient alternative. However, please convey that the 3M 6000 is still the preferred respirator to use. Both provide adequate protection; the half-face is rated to provide more protection than the 3M 8233. If you have any questions, let me know.

Thanks,
Shea

CC: Markerson, Chris M.

GGC000052

From: Buddy Gaines <gaines@gmaci.com>
To: Dan Miller <millerd@ggc.com>
Date: 4/4/01 5:51AM
Subject: ULTRA SONIC COMPRESSED AIR METER

Dear BUDDY,

This is a product that will be of great interest to you. Please note the leak detection capability and measurement performance of each meter size. You will be amazed. The cost for this "no moving parts meter" is comparable to same size turbine meters. Also please note that when installed in a vertical line, it is unaffected by entrained liquids(wet and oily compressed air).

Call us if you have any questions and/or would like to try one of these "breakthrough" meters.

Yours truly,

Buddy Gaines

GGC000053

From: NEEDHAM V. STAHL
To: Vinyl Op. / Maint.; Vinyl Shift Supervisors
Date: 4/18/01 1:30PM
Subject: Dusting

We must not have any dust at all. Only 6 documented occasions this year. Do you think this is correct???

Remember: any dusting, we need to fill out a sheet so I can put on the attached. This sheet is reported each ROST Meeting.

GGC000054

Table II.

Dust Personal Sampling Results				
Aberdeen Chemical Plant (Nov-Dec '99)				
Area	Date	Job Activity	Sample Type	Results (mg/M ³) ¹
Vinyl Dryer Area	11/16/99	A Operator- Dryer	Total	0.52
	11/16/99	A Operator- Dryer	Respirable	0.14
	11/17/99	A Operator- Dryer	Total	0.84
	11/17/99	A Operator- Dryer	Respirable	0.12
	12/16/99	A Operator- Dryer	Total	6.47
	12/16/99	A Operator- Dryer	Respirable	0.05
	12/17/99	A Operator- Dryer	Total	0.13
	12/17/99	A Operator- Dryer	Respirable	0.37
Yard	11/16/99	Yard A Operator	Total	0.96
	11/17/99	Yard A Operator	Respirable	0.1
	12/16/99	Yard A Operator	Total	0.13
	12/17/99	Yard B Operator	Respirable	0.03

¹ milligrams of dust per cubic meter of air sampled

* The OSHA-PEL is 15 mg/M³ for total dust and 5 mg/M³ for respirable dust

note: ACGIH Threshold Limit Values (TLVs) : 10 mg/M³ for total dust and 3 mg/M³ for respirable dust

Doug Knittig
King, Billy G.; STAHL, NEEDHAM V.; Wood, Kelly D.
4/23/01 12:31PM
Pond Resin

We are over 500# in Pond resin in April. What is different? I noticed several fluid bed leaks at the kasons and the water on regularly washing down instead of stopping leaks. Are the dump swecos all fixed? Is the OM one still overflowing? Is the 5305 the problem?

Why don't we check a couple of pond IVs to see if it is one resin or not?

GGC000056

From: Michael L. Carter
To: Honeycutt, Larry D.; INET:attlesa@basf.com; INET:calabrf@basf-corp.com;
INET:LBONDS@sterlingchemicals.com; Sneed, Rory H.; Somers, Terry J.
Date: 5/3/01 7:58AM
Subject: GATX 32309

This is the car which we looked at during your visit. I wanted to send an email to document what we saw in the field.

1. Bolts on the dome lid where loose.
2. Missing handles on valves.

Please note that when we starting unloading, the dome lid had PA leaking in several spots. Also, this car has a broken weld on the steam outlet flange off the main unloading valve steam jacket. This is the flange which had new bolts installed. This car needs to be repaired before shipping again. Please respond with a corrective action plan. I have taken pictures of the dome lid and steam leak. I will send these soon.

Michael L. Carter

GGC000057

From: Michael L. Carter
To: Honeycutt, Larry D.; Morgan Jr., Erskin A.
Date: 5/10/01 11:34AM
Subject: Re: PA RAILCAR

Thanks for the info. I have passed along to supplier.

Michael

>>> Erskin A. Morgan Jr. 05/06/01 06:26AM >>>

GATX 32312 SPOTTED SAT.

**THIS CAR HAS LEAKS, ALMOST LIKE THE ONE THAT MLC TOOK PICTURES OF. THIS CAR HAS
A TACKED WELD ON THE MAIN STEAM LINE AND A BUSTED WELD ON THE UNLOADING
HOUSING. (THIS IS ON TOP OF THE CAR)**

GGC000058

From: Roland D. Covington Jr.
To: STAHL, NEEDHAM V.
Date: 5/22/01 3:10AM
Subject: Re: Rost Action Items

#10 will dry more according to Larry--Because of the different motor ? -- the one that is being pushed harder will dust more ,if both are maxed out im not sure and there are other variables such as the demister pads and spray nozzle--looking at objects on the ground level downwind for dust is the only test being done at present

>>> NEEDHAM V. STAHL 05/18/01 02:43PM >>>
#10 and #11 dryers;

Why do the drying rates differ?
Which dries one more?
Which one dust more?
How are you testing the stacks for dusting?

GGC000059

From: Ben Drone
To: BROWN, SAMUEL; Drone, Ben; HAMILTON, JOHN R.; Honeycutt, Larry D.; Markerson, Chris M.; SHARP, LEON; WILSON, ANDY C.
Date: 5/22/01
Time: 8:15AM - 9:15AM
Subject: Test of the VCM Emergency Shutdown System

A meeting was held on 5/10/01 to discuss the SD system at the VCM un-loading rack.

This appointment will document the meeting and set up the appointment for testing of the system.

The SD systems at each rack do not appear to operate in a consistent way.

It was agreed that a test of the system should be conducted. This appointment will be the best timing for the test, based upon the calendars of those present at the meeting.

The test will include a test of each shutdown button (one at each end of each rack and the one in the control room) five tests in all.

On each test six items will be checked. Sphere isolation, air release from the snappy joes on east rack and west rack, deluge activation, and compressor shutdown on east and west sheds. **Leon Sharp** will develop a table to be used to document each test.

Sam Brown will determine with safety if a PM item should be added to the maintenance schedules to periodically test these field actuated systems.

The test will need to be supported by either John Hamilton or Andy Wilson for DCS support.

Another meeting will be scheduled after the test to determine the necessary actions required based upon the test results.

CC: Carter, Michael L.; Knittig, Doug; STAHL, NEEDHAM V.

GGC000060

From: NEEDHAM V. STAHL
To: Vinyl Op. / Maint.; Vinyl Shift Supervisors
Date: 5/23/01 12:16PM
Subject: Test of VCM Filters

See the attached. Go over with operators and make sure they understand what is expected of them. There is a space on the tracking sheet for the Supervisor on shift to sign for each check, so make sure the testing is done correctly.

Thanks.

CC: AKINS, KENNETH; Knittig, Doug; Markerson, Chris M.; Wood, Kelly D.

GGC000061

From: JEFFERY C. SHIELDS
To: STAHL, NEEDHAM V.
Date: 5/25/01 5:42PM
Subject: Re: #2

I nor my -A- op was told on the 5-23-01 that a leak had occured, and sure enough I looked back to verify that I was correct and sure enough I was correct. the largest leak I had that day was a 3.8 at the hi mol sweco. If Im missing something please feel free to point it out to me. Thanks for noticing...

>>> NEEDHAM V. STAHL 05/25/01 10:50AM >>>

GGC000062

From: BRANDON NADLER
To: FEC, DENNIS; JUNOT, STEVE
Date: 5/31/01 11:30AM
Subject: Re: Fwd: proposed agenda

What I want to cover is the "Do's and Don'ts" regarding potable water and the potable water piping distribution system. I want to make sure that people know that they may not modify potable water piping, attach a hose, or if there is a station it must have a back flow preventer and it must have an annual inspection, etc. Also, I would like to review any Georgia Gulf procedures that we may have that give specific details of what we are expected to do when working with potable water piping. We don't want to talk about water treatment methods, arsenic, DHH, legal issues, etc.
Brandon

>>> DENNIS FEC 05/31/01 11:52AM >>>

Steve,
please put together a list of the items you will cover in this meeting; they should be basically the information we are putting on the site potable water procedure

The floor will NOT be open to anything else concerning the water system; if there is something you believe should be included in what you will cover, outside of the procedure mentioned earlier, please get with me. THANKS

>>> BRANDON NADLER 05/31/01 11:39AM >>>

Steve,

I have you scheduled to speak to the phenol operations group about potable water regulations in our annual environmental and safety training. Our meetings are Tuesday, June 5th and Thursday, June 7th. The agenda is attached, you are scheduled to speak in the afternoons. Please let me know if this is suitable.
Thanks,

Brandon

GGC000063

From: RODNEY B. STRICKLAND
To: STAHL, NEEDHAM V.
Date: 5/31/01 8:27AM
Subject: Re: #2

Clearing technics are not improper that I know of and the line was recovered again and held to a vaccum while the blank was installed that is how we found that the valve was leaking through and all personal had on their PPE'S on . Maybe if we had all new equipment and lines or hoses it would have been better ; it may not have been better even at that I do not know .

>>> NEEDHAM V. STAHL 05/31/01 08:49AM >>>

So are these improper clearing technics? Why was the line blinded with out being steamed and recovered again?

>>> RODNEY B. STRICKLAND 05/31/01 08:31AM >>>

When Darnell recovered the transfer line from the tank farm he said that he had run hot water though the line untill the line was hot in the pipe rack an he had pulled a vaccum on the line and he opened a bleeder a few min. after he opened the bleeder he started haveing pressure the next monring we kept a vaccum on the line while we blanked the line out . Jeff told me that he had trouble at some of the fittings on the at the rubber gaskets is what I thought he was talking about .

>>> NEEDHAM V. STAHL 05/31/01 07:51AM >>>

what about the tank farm leaking through? We are suppose to keep a vaccum there all the time. On the hoses, we are suppose to use hoses that leak, we also have the chemical hoses that should be used.

>>> RODNEY B. STRICKLAND 05/31/01 07:20AM >>>

Some of the readings that I know about or was told about were the valve coming from the tank farm is leaking through , there were several due to recovery hoses leaking , and the recovery line from the New unit dump tank to the old unit ERS . Old unit dump kept building pressure . This is all that I know of .
Rodney

>>> NEEDHAM V. STAHL 05/25/01 10:50AM >>>

From: BRANDON NADLER
To: MAGEE, DAVE
Date: 6/5/01 4:11PM
Subject: Re: Phenol Update - Tuesday 6/5

No, the technician did not use respiratory protection, I believe for two reasons. First, he was not simply overcome by the intensity of the fumes. After some time of trying to isolate equipment in the presence of the fumes he began to have some difficulty breathing at which time he got out of the area. Second, with the power failure he knew that we had no pumps available to keep reflux and hence cooling on the towers, but the steam system was still live. With this situation, the supervisor requested that all of the outside technicians begin manually isolating steam to equipment, so he was helping to manually isolate steam to prevent equipment from overpressuring or overflowing. I am sure that the emergency nature of the situation contributed to his decision to continue working in the area rather than going in to get an air pack before attempting to enter the area to work.

>>> DAVE MAGEE 06/05/01 07:50AM >>>

Brandon, did the operator who was effected by fumes Saturday night use respiratory protection upon confronting the fumes? If not, why?

>>> BRANDON NADLER 06/05/01 07:23AM >>>

PHENOL

No injuries, no emissions.

Production = 0.97 mmlbs.

Unit running well

Phenol unit safety and environmental refresher training today and Thursday. I will be there all day.

Frank will provide an update on Shipping activities.

GGC000065

From: NEEDHAM V. STAHL
To: Vinyl Op. / Maint.; Vinyl Shift Supervisors
Date: 6/5/01 8:21AM
Subject: Fwd: Pond In May - This is not a fishing trip

See attached. Do we need to blind the sewer valves on all blend tanks? Or can you as supervisors prevent any material from getting to the sewers? If there isn't a drastic change in the next week, I'll have no choice.

As you all know, in July the pond material customer will change which will lower the price of this material even more than it is already. This means that the elimination of pond material is a must.

I thought this message had been relayed to each of you before, but when I see resin being pumped and drained to sewers I know you haven't understood the priority that should be place on this.

GGC000066

From: BRANDON NADLER
To: MAGEE, DAVE
Date: 6/7/01 2:34PM
Subject: Re: Phenol Update - Tuesday 6/5

I will ensure that this incident is reviewed amongst all four shifts and that the expectation is not only for personnel to not remain in an area where the potential for such exposure exists, but to get the appropriate PPE, or take other corrective action to ensure it is safe to work in the area. I have also investigated and found that we do stock organic vapor respirator cartridges in SCIMP, but these are not "standard issue". I will also ensure that technicians are made aware of the organic vapor respirators are that the respirators are made readily available for their use, as well as the Scott air packs.

Brandon

>>> DAVE MAGEE 06/07/01 10:54AM >>>

Brandon, I understand the situation that existed. However, based upon the posture of OSHA and experience with the courts, the expectation is that the employer is to provide whatever protection is required to avoid health impacts on the employee. We have had several cases where "GOOD" employees working in a situation like you had, years later come back to sue for damages to health. Workman's comp. is not the total net that we would like to think. Bottom line is we cannot expect or allow employees to work in an atmosphere that exposes them to health impacts due to chemicals.

>>> BRANDON NADLER 06/05/01 05:11PM >>>

No, the technician did not use respiratory protection, I believe for two reasons. First, he was not simply overcome by the intensity of the fumes. After some time of trying to isolate equipment in the presence of the fumes he began to have some difficulty breathing at which time he got out of the area. Second, with the power failure he knew that we had no pumps available to keep reflux and hence cooling on the towers, but the steam system was still live. With this situation, the supervisor requested that all of the outside technicians begin manually isolating steam to equipment, so he was helping to manually isolate steam to prevent equipment from overpressuring or overflowing. I am sure that the emergency nature of the situation contributed to his decision to continue working in the area rather than going in to get an air pack before attempting to enter the area to work.

>>> DAVE MAGEE 06/05/01 07:50AM >>>

Brandon, did the operator who was effected by fumes Saturday night use respiratory protection upon confronting the fumes? If not, why?

>>> BRANDON NADLER 06/05/01 07:23AM >>>

PHENOL

No injuries, no emissions

Production = 0.97 mmibs

Unit running well

Phenol unit safety and environmental refresher training today and Thursday. I will be there all day.

Frank will provide an update on Shipping activities.

GGC000067

From: FRANK VENDT
To: BUTT, SHAMIM; GOLDSMITH, DAVE; KAVANAGH, COLEMAN; KIRBY, DANA;
NADLER, BRANDON; TOLLESON, TED; VENDT, FRANK; WILSON, JOHN
Date: 6/12/01
Time: 1:00PM - 2:00PM
Subject: Hopper Truck Loading at the Truck Turnaround
Place: Administrations Main Conference Room

Please be prepared to discuss preventive measures to keep pvc dust from entering the East ditch.

Frank J. Vendt
225-298-2601 (Office)
225-687-0447 (Fax)
vendtf@ggc.com

Frank J. Vendt
225-298-2601 (Office)
225-687-0447 (Fax)
vendtf@ggc.com

GGC000068

From: Chris Markerson
To: ABERDEEN GROUP
Date: 6/27/01 1:12PM
Subject: Recent Injuries

In the Aberdeen Plant, we have had 3 recordable injuries/illnesses in the past 3 weeks. These 3 recordables are more than we have had in the previous 2 years combined. The injuries/illnesses have included heat cramps, a facial laceration, and a muscle strain.

Obviously, this current trend is not our expected safety performance, and these injuries / illnesses can be prevented.

In the next 14 days, each supervisor shall meet with his/her area or shift to review our current safety performance and to reinforce the need to work safely.

Key points to discuss with all employees shall include the following:

1. Current safety performance
2. Being aware of your work environment (heat, slip hazards, limited clearances, using proper body position, etc.)
3. Taking responsibility for your own safety.
4. Looking out for your co-workers

When this discussion is conducted, please complete a sign-in sheet and send this sheet to your department Manager and a copy to Safety.

Doing your part to ensure safe work every day is important to everyone.

CMM

From: NEEDHAM V. STAHL
To: Vinyl Op. / Maint.; Vinyl Shift Supervisors
Date: 6/27/01 2:51PM
Subject: VCM Filters

We have had a mass confusion on our testing and sampling. Through the bottles that have been caught and the saved filters away. We'll start over. See if the attached makes more sence. Print only one of the Excel sheets for use and put on a clip board. (2 test per pack, 4 samples total per pack).

GGC000070

Georgia Gulf MEMO

To: Vinyl Supervisors
From: Needham Stahl
Date: June 27, 2001
Subject: VCM Filter Packs - Revised

During some of our comparisons of resin plants, a question was asked about VCM filter disposal. I would like to verify that our filter stripping procedures are still adequate in the removal of VCM from the elements as designed. The following are some test that I would like to complete and samples to catch for this verification. These tests should be completed in each module on Fresh VCM, Recovered VCM, and Ring Seal Water filter packs.

Test #1 Follow the current procedure. When the pack is opened:

- Sample #1 Hnu meter reading _____ ppm.
Sample the filter element and place into a clean residual bottle.
Sample #2 Place elements into a Gaylord box, let cool (App. 30 minutes), check again with Hnu meter _____ ppm.
Sample the filter element again and bottle.

Test #2 Follow current procedure to Step #10, then complete the following:

Close recovery valve and open steam addition valve. Pressure pack up to 40-psi then close steam addition valve. Open recovery valve and pull pack to a vacuum. Repeat these steps five times, then continue procedure.

- Sample #1 When pack is opened, Hnu reading _____ ppm.
Sample the filter element.
Sample #2 Place elements into a Gaylord box, let cool (App. 30 minutes), check again with Hnu meter _____ ppm.
Sample the filter element again and bottle.

When replacing the Ring seal water filter elements, I need a similar test conducted.

Test #1: Follow the current procedure. When pack is opened:

- Sample #1 Hnu meter reading _____ ppm.
Sample the filter element and place into a clean residual bottle.
Sample #2 Place elements into a Gaylord box, let cool (App. 30 minutes), check again with Hnu meter _____ ppm.
Sample the filter element again and bottle.

Test #2 Follow the current procedure until the pack is ready to open then,

Close recovery valve and open steam addition valve. Pressure pack up to 40-psi then close steam addition valve. Open recovery valve and pull pack to a vacuum. Repeat these steps five times, then continue procedure.

Sample #1 When pack is opened, Hnu reading _____ ppm.
Sample the filter element.

Sample #2 Place elements into a Gaylord box, let cool (App. 30 minutes), check again with Hnu meter _____ ppm.
Sample the filter element again and bottle.

All bottles should be labeled with the module, filter pack, initial sample or cooled sample, Operator's name, and date.

The attached is a sheet to track the filter packs and completion times.

NEEDHAM V. STAHL
Vinyl Op. / Maint., Vinyl Shift Supervisors
7/16/01 10:17AM
Dusting Incidents

Are we so board that we can't think? In the past couple of months, I have only received 2 dusting incident sheets. You know as well as I do that there have been more than this.

Once again, I have an action item to document all the dusting incidents that we have. This is reported each month to all attendees of the ROST meeting. What I need is sheets filled out each time we put resin in the air, on the ground, or any place that it should not be going. If you would like, you can report these findings at the meetings and tell them how great we are doing.

Yes, you can fill sheets out on problems you had last week.

GGC000073

<u>Date</u>	<u>Silo Overfill</u>	<u>Transfer Line</u>	<u>Dryer Related</u>	<u>Other</u>
5/5/99	692			
5/5/99	493			
5/6/99				684 silo valve open
5/25/99		600's		Coupling
5/28/99		689		
5/30/99				FB Dryer lost control of dampers
5/30/99	692			
6/1/99	493			Truck blowing material
6/3/99		689		Coupling
6/3/99		689		Coupling/Truck blowing material
6/3/99	677			
6/3/99	493			
6/10/99	475			
6/12/99	683			
6/14/99	475			
6/21/99		600's		Coupling
6/24/99	689			
7/30/99			X	#10 Scrubber/ Dryer backed up
7/30/99		686		Coupling
8/7/99		692		Coupling failure twice
8/10/99				Big Pit flex hose
8/11/99		676		
9/10/99		600's		
9/18/99				600 series silo lids lifting
9/21/99			X	#5 baghouse
9/22/99	680			
10/17/99	692			Dusting from lid
10/19/99		#4 dryer		Coupling
12/17/99	692			Dusting from lid
12/23/99		692		Coupling
12/28/99		X		V-11 transfer line coupling
1/15/00	479			
1/20/00		690		Coupling
1/20/00	682			
1/21/00			X	#11 Dryer backed up
1/23/00		689		Coupling
2/10/00			X	#11 Dryer backed up
2/20/00				676 Silo lid dusting
2/20/00				686 Silo lid dusting
2/28/00		690		Replacing coupling with flanges
3/1/00		689		
3/6/00				676 Silo lid dusting
3/7/00				687 Silo baghouse cracked
3/7/00				681 Silo lid dusting
3/12/00		475		
3/21/00		282		Coupling leaking
	<u>Silo</u>	<u>Transfer</u>	<u>Dryer</u>	<u>Other</u>

[illegible]

<u>Date</u>	<u>Silo Overfill</u>	<u>Transfer Line</u>	<u>Dryer Related</u>	<u>Other</u>
5/5/99	692			
5/5/99	493			
5/6/99				684 silo valve open
5/25/99		600's		Coupling
5/28/99		689		
5/30/99				FB Dryer lost control of dampers
5/30/99	692			
6/1/99	493			Truck blowing material
6/3/99		689		Coupling
6/3/99		689		Coupling/Truck blowing material
6/3/99	677			
6/3/99	493			
6/10/99	475			
6/12/99	683			
6/14/99	475			
6/21/99		600's		Coupling
6/24/99	689			
7/30/99			X	#10 Scrubber/ Dryer backed up
7/30/99		686		Coupling
8/7/99		692		Coupling failure twice
8/10/99				Big Pit flex hose
8/11/99		676		
9/10/99		600's		
9/18/99				600 series silo lids lifting
9/21/99			X	#5 baghouse
9/22/99	680			
10/17/99	692			Dusting from lid
10/19/99		#4 dryer		Coupling
12/17/99	692			Dusting from lid
12/23/99		692		Coupling
12/28/99		X		V-11 transfer line coupling
1/15/00	479			
1/20/00		690		Coupling
1/20/00	682			
1/21/00			X	#11 Dryer backed up
1/23/00		689		Coupling
2/10/00			X	#11 Dryer backed up
2/20/00				676 Silo lid dusting
2/20/00				686 Silo lid dusting
2/28/00		690		Replacing coupling with flanges
3/1/00		689		
3/6/00				676 Silo lid dusting
3/7/00				687 Silo baghouse cracked
3/7/00				681 Silo lid dusting
3/12/00		475		
3/21/00		282		Coupling leaking
	<u>Silo</u>	<u>Transfer</u>	<u>Dryer</u>	<u>Other</u>

[illegible]

<u>Date</u>	<u>Silo Overfill</u>	<u>Transfer Line</u>	<u>Dryer Related</u>	<u>Other</u>
5/5/99	692			
5/5/99	493			
5/6/99				684 silo valve open
5/25/99		600's		Coupling
5/28/99		689		
5/30/99				FB Dryer lost control of dampers
5/30/99	692			
6/1/99	493			Truck blowing material
6/3/99		689		Coupling
6/3/99		689		Coupling/Truck blowing material
6/3/99	677			
6/3/99	493			
6/10/99	475			
6/12/99	683			
6/14/99	475			
6/21/99		600's		Coupling
6/24/99	689			
7/30/99			X	#10 Scrubber/ Dryer backed up
7/30/99		686		Coupling
8/7/99		692		Coupling failure twice
8/10/99				Big Pit flex hose
8/11/99		676		
9/10/99		600's		
9/18/99				600 series silo lids lifting
9/21/99			X	#5 baghouse
9/22/99	680			
10/17/99	692			Dusting from lid
10/19/99		#4 dryer		Coupling
12/17/99	692			Dusting from lid
12/23/99		692		Coupling
12/28/99		X		V-11 transfer line coupling
1/15/00	479			
1/20/00		690		Coupling
1/20/00	682			
1/21/00			X	#11 Dryer backed up
1/23/00		689		Coupling
2/10/00			X	#11 Dryer backed up
2/20/00				676 Silo lid dusting
2/20/00				686 Silo lid dusting
2/28/00		690		Replacing coupling with flanges
3/1/00		689		
3/6/00				676 Silo lid dusting
3/7/00				687 Silo baghouse cracked
3/7/00				681 Silo lid dusting
3/12/00		475		
3/21/00		282		Coupling leaking
	<u>Silo</u>	<u>Transfer</u>	<u>Dryer</u>	<u>Other</u>

[illegible]

From: NEEDHAM V. STAHL
To: Vinyl Op. / Maint.; Vinyl Shift Supervisors
Date: 7/27/01 10:20AM
Subject: VCM Filter Testing

Thrid time's a charm.

Once again we have made a complete mess with the filter samples.

All the old samples have been discarded. I printed a new sheet that contains 3 pages. On these pages each filter pack that contains some amount of VCM are listed four times. Each of these listings have a distinct meaning:

Test 1, Sample 1

Test 1, Sample 2

Test 2, Sample 1

Test 2, Sample 2

(Refer to the attached memo for the definitions).

Only two testings (#1 & #2) and four samples (2 per test) per pack shall be completed/obtained. Don't make copies of the sheet and continue testing/sampling the packs that have already been completed.

Thanks for your cooperation, maybe we will complete this task soon.

CC: Knittig, Doug; Wood, Kelly D.

GGC000080

From: Michael L. Carter
To: BAGWELL, AMY
Date: 8/15/01
Time: 12:30PM - 1:30PM
Subject: Management Safety Committee-Delegated
Place: Main Conf. Room

Please attend, not sure what all is going to be covered.

Michael

>>> Chris M. Markerson 07/24/01 03:58PM >>>

Meeting to review Safety Involvement Team information - based on Plaquemine experience. Second meeting to follow on 8/22 to discuss specifics of implementation and training.

CMM

GGC000081

From: BRANDON NADLER
To: FREEBURGH, CHARLIE
Date: 8/24/01 2:51PM
Subject: Cumene Hole

Charlie,

We have a better cost estimate of excavating and disposing of soil around the pipe rack where we found the leak on the cumene line. Based upon core samples we estimate that we would have to remove a 20' radius, 10' deep = 465 yards of soil. Disposal of the first dumpsters we removed was about \$6000 per 15 yard dumpster, so disposal alone would be about \$190M. With construction of temporary piping supports, excavation and back filling the costs could be \$400 - \$500M.

The other option we are looking at is electro-kinetic destruction. We will take a soil sample to have evaluated. The costs of this test will be about \$3000. A very preliminary estimate for this system is about \$150M for initial installation. This process could take 1 to 2 years, and would require routine monitoring to determine when treatment is complete. A representative from Hillary Garner is working with Terran Corporation to see if this process will work with our conditions. Hillary has spoken with the DEQ and they are receptive to this process (as long as the end results meet their requirements). She also informed them that this process could take a couple of years, and they were fine with that, as long as we are demonstrating progress. The test will take about 4 weeks to conduct, so it will probably be late September / early October before we know if this system will work.

Brandon

GGC000082

From: David W. Nolen
To: AUTREY, JIMMY; Markerson, Chris M.; SARGENT, SHEA P
Date: 8/27/01 7:46AM
Subject: vcm

I turned in a safety item about a leak on the GC in the old unit control room. I had walked into the room when it was full of vcm gas. This was caused by tubing leaking from the gc that samples the gas going to the incinerator. Can you tell me what is happening to this request.

David Nolen

GGC000083

From: Larry D. Honeycutt
To: Fruge, Archie P.
Date: 8/29/01 7:13AM
Subject: VCM R/C UTLX 901217

THIS R/C ARRIVED INTO THE PLANT FOR OFFLOADING AND HAD A BALL OF ICE ON "A" END
LICQUID VALVE. LEAK WAS AT VALVE STEM (R/C HAS WHEEL VALVE). WE DID OFFLOAD AND
WILL BE ON OUTBOUND TODAY. R/C HAS NORMAL HEEL IN IT.

CC: Carter, Michael L.; POLITO, STEVE

GGC000084

From: Chris M. Markerson
To: AKINS, KENNETH; ANDREWS, FRANKLIN; AUTREY, JIMMY; BAGWELL, AMY; BEALL, JOE; CALDWELL, WILLIAM (BILL); Carter, Beverly S.; Carter, Michael L.; Covington Jr., Roland David; Davis, William J.; Drone, Ben; Gathings Jr., Dave; Harlow, Jimmy R.; Hegwood, Joseph B.; Honeycutt, Larry D.; Howell, James O.; Hull, John D.; King, Billy G.; KNITTIG, Amy E.; Knittig, Doug; KOBER, PAUL J.; LANGFORD, MICHAEL G.; Markerson, Chris M.; Miller, Daniel A.; Noland, Terry L.; PERRY, DARNELL; PLUNKETT, DAVID E.; Reynolds, Richard T.; SARGENT, SHEA P; SHIELDS, JEFFERY C.; Sneed, Rory H.; STAHL, NEEDHAM V.; STRICKLAND, RODNEY B.; WELLS, PATRICIA A.
Date: 8/30/01 10:01AM
Subject: Safety Training

We are planning half day training sessions for September. The plan is to provide training to operations while they are on shift. As business is slow, we think this can be accomplished.

Training dates are Sept. 12, 13, 19, 20, and 27th, with 2 sessions each day. Please begin making plans to have all employees attend this training. The agenda is attached, please let me know if you have any questions or comments.

GGC000085

From: NEEDHAM V. STAHL
To: Vinyl Op. / Maint.; Vinyl Shift Supervisors
Date: 8/31/01 7:58AM
Subject: Safety

See attached. We have to get better.

CC: Knittig, Doug; Wood, Kelly D.

GGC000086

Georgia Gulf MEMO

To: Vinyl Supervisors
From: Needham Stahl
Date: August 31, 2001
Subject: Safety

We all know that changes are in process within the plant with personnel moves and layoffs. We have had several incidents that are probably linked to these changes because of everyone's mind-set has not been totally on their responsibilities. We have had an injury and coarse batch of resin just this week. It is as much our responsibility as each other employee's to keep every-one as safety conscious as we can and to keep the motivation of our people up on a daily basis.

I received an e-mail yesterday, which told me about a group of individuals in the plant that were not wearing their proper personal protective equipment properly. At this time, I am not sure if anything was said or done about the problem but I'll check into deeper. After reading this, I had an uneasy feeling that we are not doing our part in the aspect of **SAFETY**.

To remind each of you, it is your and my responsibility to ensure that each task that an operator, maintenance employee, contractor, etc. that comes into the Vinyl Department has and uses the following when needed:

1. A permit if performing a task or has signed in on the "White Board" if they are just walking through.
2. Hard Hat
3. Glasses with side shields
4. Ear plugs
5. Nomex – worn correctly. Sleeves down and snapped. Shirts snapped or buttoned – nothing hanging out. Coveralls zipped up – nothing hanging out.
6. Safety harness with proper lanyard
7. Gloves – cotton, leather, rubber, or neoprene which fits the task.
8. Face shields
9. Goggles
10. Slicker suits
11. Rubber boots

The guards will check all badges and will not let anyone in that is not currently safety training.

I will be looking and expect each of you to do the same. If you have a problem with any of the above, let me know and I will get in contact with their superior or each of you have the authority to do the same to get the problem corrected. If a Vinyl Employee is the problem, discipline is in order.

If you have any questions, feel free to see me.

From: Michael L. Carter
To: Honeycutt, Larry D.
Date: 9/10/01 8:33AM
Subject: Re: Leak Detection and Elimination

Dean, we need to ensure that the sheets are completed properly. Please look into this and let me know of problems.

Michael

>>> NEEDHAM V. STAHL 09/07/01 02:12PM >>>

What will it take to get this sheet filled out correctly? This continues to be a problem that has to be corrected. Discipline is in order for incorrectly documenting when not completed correctly.

Continue putting all incomplete sheets on the back of the morning report.

Be ready each morning (Tuesday through Friday) to discuss each reading that is in Vinyl Department for the previous day and on Mondays for the previous weekend. The Yard Department is responsible for their own after they are notified.

Kenny, I added you to the full morning report list so you can see some of the problems that we continue to have. Maybe you can help us on correcting our problem areas.

GGC000088

From: Michael L. Carter
To: BAGWELL, AMY; Carter, Beverly S.; Harlow, Jimmy R.; Honeycutt, Larry D.
Date: 9/17/01 12:21PM
Subject: Safety Training

Please be reminded that the second sessions of safety training will be this week. Please try to get all your folks to the training.

Michael

GGC000089

From: Daniel A. Miller
To: PLUNKETT, DAVID E.
Date: 9/17/01 3:19PM
Subject: Re: Lo mol dump tank oil seal

David,
I talked with Ricky Hicks(Durametallic seals) about these seals again today and I hope the following answers all of your questions.

Could incorrect nitrogen pressure be the cause? Yes, to much pressure could cause to much pressure on the seal faces causing premature wear and failure.

What should the correct pressure be? 20 to 25 psi above the tank operating pressure. So we could lower it some but 100-125 is not excessivley high for the dump tank, however for the feed tank the pressure should be lower, again 20 -25 psi above the process pressure.

Why do we need nitrogen pressure? Could we not hook tubing to a recovery line to the blow down tank to prevent a release should the seal leak (similar to vcm xfer pumps at sphere)?
To comply with the VCM regulations the barrier fluid must be higher than the process or controlled and alarmed when pressure rises to fast (like the xfer pumps at the sphere). The seal design in the agitators was not made for lower barrier fluid pressure. The inboard seat is only retained when the barrier fluid is higher than the process. It is a balanced seal, however to much differential will cause the seat to lift and displace the oil probably causing the outboard seal to run dry, wear out and then leak. It is also possible that pressuizing the tank before the seal has N2 pressure on it (like after it is down for an extended period of time) could do the a similiar thing.

Ricky is guessing that a seal could be designed for this aplication and a rough estimate of the cost to replace the seal with a new design that could run like the VCM xfer pumps is \$6-10M per seal. The housing and the seal would be different to accomodate the tandem seal operation. (\$36M- 60M total)

I will come and take a look at the low mole tank tomorrow and see if there is some thing else wrong. Sorry I can't offer a better solution. Call me if I can answer any other questions.

Dan Miller

>>> DAVID E. PLUNKETT 09/17/01 02:19PM >>>

The oil seal has blown out on the lo-mol dump tank agitator seal again. This time it is not releasing any vcm but the oil is leaking from tank out the weep hole . Could incorrect nitrogen pressure be the cause? What should the correct pressure be? We have the guages set 100-125 psi. Why do we need nitrogen pressure? Could we not hook tubing to a recovery line to the blow down tank to prevent a release should the seal leak (similar to vcm xfer pumps at sphere)?

CC: AUTREY, JIMMY; Knittig, Doug; Wood, Kelly

GGC000090

From: BRANDON NADLER
To: SHEFFIELD, JULIE
Date: 9/18/01 5:56AM
Subject: Re: Good news on TRE!

Julie,

Lets have a meeting to decide how to use this for our reporting. I believe that if we get together we can come to agreement pretty quickly.

Brandon

>>> JULIE SHEFFIELD 09/17/01 12:50PM >>>

Test Condition 1, TRE $\geq$ 8.42

Test Condition 2, TRE $\geq$ 4.65

This means we are HON Group 2, no further control required. Plus, since we are ≥ 4 , no monitoring required.

Now we need to decide how to use these data to develop new permit rates and our actual emissions to report. I think we should abandon our old method of calculating condenser emissions using primary carbon data and other assumptions. Should we have a meeting or a phone call? Let me know.

Julie
x2631

GGC000091

From: Michael L. Carter
To: BAGWELL, AMY; Carter, Beverly S.; Harlow, Jimmy R.; Honeycutt, Larry D.
Date: 9/24/01 11:46AM
Subject: Safety Training

This Thursday is the last day for Safety Training. Chris said that there will be two sessions as last week.

Michael

GGC000092

From: BRANDON NADLER
To: ACCARDO, JF; NOBLES, BENNIE
Date: 10/4/01 8:38AM
Subject: Re: Fwd: INSPECTION REGULATIONS

JF,

PSC has railcar inspectors that inspect all phenol, caustic, acetone, AMS and VCM (all of the products that PSC loads) railcars prior to loading. The inspectors are trained per AAR standards, and have inspection forms that parallel AAR inspection requirements, including inspecting undercarriage, brakes, coupler, wheels etc. Any items found defective are sent for repairs, on site by MMC for GGC owned cars or Union Tank for leased cars, or off site to a shop if necessary, prior to loading. MMC has certification for Class F, G and L repairs which includes valves, safety relief valves, hardware such as brakes, wheels, etc and internal linings. Additionally the inspection and repair process that PSC and MMC perform had a railcar repair task force to ensure inspections and repairs are performed according to AAR guidelines. Also this process was audited by Karl Green and an independent auditor last year. One of the audit recommendations was that this process should also encompass PVC and Chlorine cars, which may already exist, but was not or is not performed by the groups that were audited (PSC and MMC). This is probably an appropriate subject to sit down and discuss and try to develop systems where we are doing things consistently between each of the groups. I believe that a railcar inspection should cover the same items whether it is conducted by a PSC inspector or the GGC chlorine loader.

Brandon

>>> JF ACCARDO 10/03/01 04:36PM >>>

Bennie, the Cl2 cars are inspected by both the person that loads the car and the "valve repair" personnel (Mike Lovelace). They both use inspection forms which are kept on file. I believe these issues are covered on the inspections except, perhaps, the undercarriage, brakes, coupler, etc. By copy of this memo I am asking E. J. Landry to review our inspections procedures to make sure we specifically cover those items on the list that we (operations) can cover. We can send you and Steve Politio copies of the forms.

We will get with B. Nadler (shipping , railcar repair and railroad crew) to see how the other equipment can be inspected .

Let me know if you have any questions or suggestions.

JF

>>> BENNIE NOBLES 10/03/01 08:55AM >>>

Attached is the reg. mandating inspection of tank cars in hazardous materials service. The inspection is required , not optional.

I have sent this to Brandon Nadler. He is to visit with Charlie Freeburgh on the subject.

We are in trouble if we don't remedy this situation.

CC: BAKER, RONNIE; LANDRY, EJ

GGC000093

From: Chris M. Markerson
To: Supervisors2001
Date: 10/15/01 9:47AM
Subject: GGC Aberdeen Monthly Safety Stats

Attached is the data and charts for the Aberdeen Plant's safety performance. As you can see by the graphs, the Aberdeen Plant's current incident rate is 2.44. This current incident rate has reached its highest level in 2 years.

Please take an opportunity to share this information with the employees in your area. For many months, the Aberdeen plant has been able to distinguish itself from other GGC locations because of our outstanding safety performance. Encourage each employee to evaluate his / her daily work practices and take the necessary actions to work safe. Our goal is to return to an incident rate of 0.0 which we have achieved in the recent past. This goal is reached by working safe, one day at a time.

As the holiday season approaches, the number of daily distractions can increase, and a strong emphasis on safety is needed to keep everyone focused on working safe. To ensure this focus, each supervisor should begin each work day with a brief tool box safety meeting. The meetings do not need to be formal or very long, but do take the time to re-emphasize our goal of 0 injuries, and the importance of working safe.

Thanks

CMM

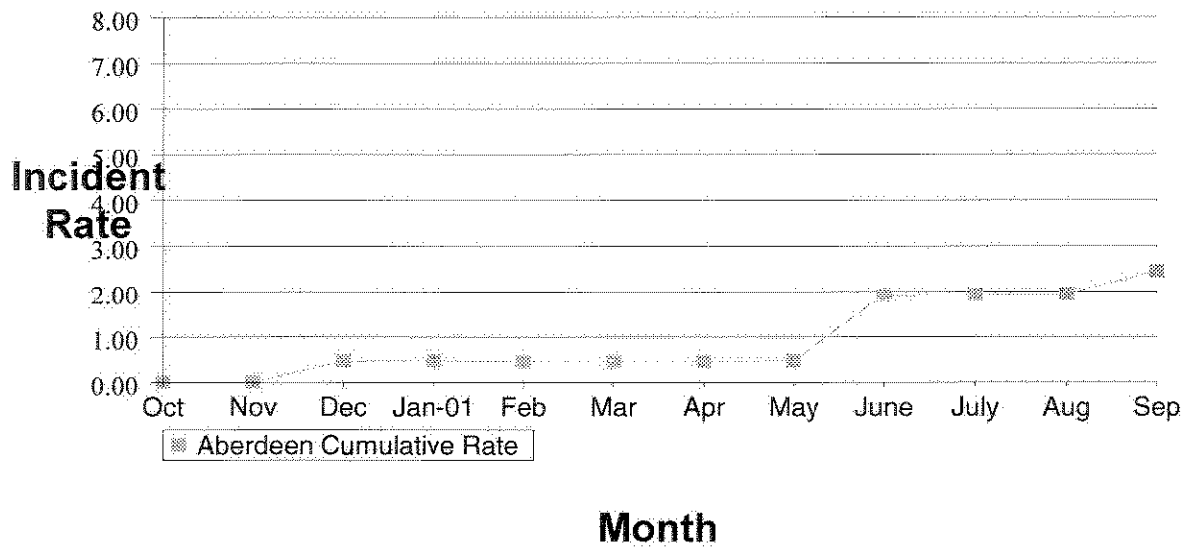
GGC000094

Month/Year	Number of Recordables	Manhours	Runtotal Injuries	Runtotal Inc. Rate	First-Aids	Medical Treatment	Restricted Work Case	Lost Time Incidents	Number of Lost Workdays
Jan-96	0	35609	8	3.70	2	0	0	0	
Feb	0	34042	6	2.80	2	0	0	0	
Mar	0	33676	4	1.90	1	0	0	0	
Apr	0	31760	4	1.90	0	0	0	0	
May	0	34435	3	1.50	2	0	0	0	
Jun	0	33990	3	1.50	1	0	0	0	
July	0	34402	3	1.50	0	0	0	0	
Aug	1	36117	4	2.00	0	1	0	0	
Sep	2	32697	5	2.50	0	2	0	0	
Oct	0	37107	5	2.40	0	0	0	0	
Nov	0	30520	5	2.50	0	0	0	0	
Dec	0	31683	3	1.50	0	0	0	0	
Jan-97	1	36972	4	1.96	0	1	0	0	
Feb	0	33982	4	1.96	2	0	0	0	
Mar	0	34636	4	1.96	1	0	0	0	
Apr	1	35105	5	2.43	2	1	0	0	
May	1	35161	6	2.91	0	0	1	0	
June	1	35338	7	3.38	1	1	0	0	
July	0	35287	7	3.38	0	0	0	0	
Aug	0	34896	6	2.90	0	0	0	0	
Sep	0	34789	4	1.93	2	0	0	0	
Oct	0	38609	4	1.92	0	0	0	0	
Nov	1	31583	5	2.39	0	1	0	0	
Dec	0	32445	5	2.39	0	0	0	0	
Jan-98	0	37274	4	1.91	1	0	0	0	
Feb	1	35247	5	2.38	0	0	0	1	5 - Knee Lig.
Mar	1	37923	6	2.83	0	1	0	0	
Apr	0	36636	5	2.35	2	0	0	0	
May	0	34989	4	1.88	0	0	0	0	
June	1	37751	4	1.87	0	0	0	1	65 - Shoulder / Ribs
July	0	37942	4	1.86	0	0	0	0	
Aug	0	35449	4	1.86	0	0	0	0	

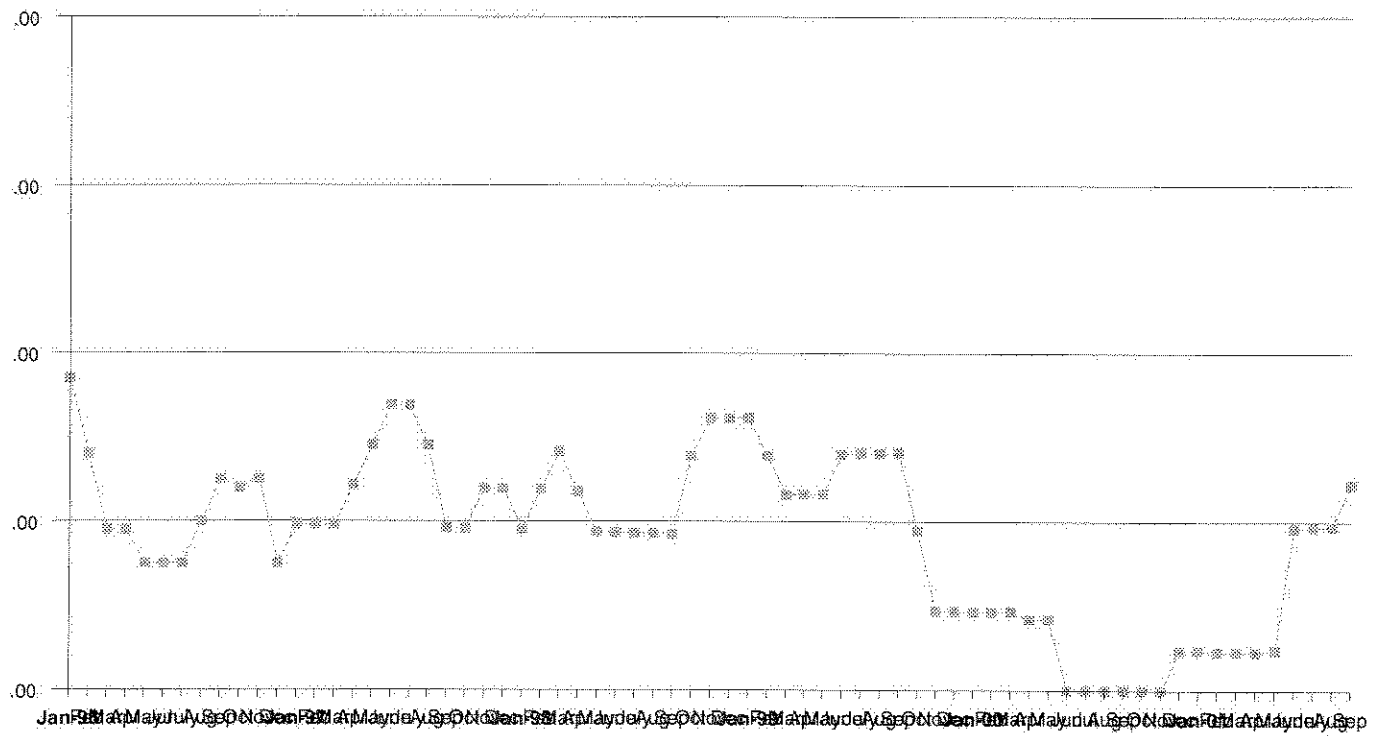
Sep	0	36897	4	1.85	1	0	0	0	0
Oct	2	38216	6	2.78	0	0	1	1	17 - Stim Back
Nov	2	33239	7	3.23	0	2	0	0	
Dec	0	33239	7	3.22	0	0	0	0	
Jan-99	0	36240	7	3.23	1	0	0	0	
Feb	0	33742	6	2.78	0	0	0	0	
Mar	0	37561	5	2.32	1	0	0	0	
Apr	0	35096	5	2.32	2	0	0	0	
May	0	34878	5	2.32	0	0	0	0	
June	2	36798	6	2.80	2	1	1	0	
July	0	35348	6	2.81	1	0	0	0	
Aug	0	36163	6	2.81	2	0	0	0	
Sep	0	35405	6	2.82	0	0	0	0	
Oct	0	35806	4	1.89	1	0	0	0	
Nov	0	35293	2	0.94	0	0	0	0	
Dec	0	35293	2	0.94	0	0	0	0	
Jan-00	0	38308	2	0.93	2	0	0	0	
Feb	0	34821	2	0.93	0	0	0	0	
Mar	0	34421	2	0.94	0	0	0	0	
Apr	0	29867	2	0.84	0	0	0	0	
May	0	52038	2	0.84	1	0	0	0	
Jun	0	34857	0	0.00	0	0	0	0	
Jul	0	34685	0	0.00	0	0	0	0	
Aug	0	33020	0	0.00	2	0	0	0	
Sep	0	33484	0	0.00	1	0	0	0	
Oct	0	33976	0	0.00	5	0	0	0	
Nov	0	32566	0	0.00	0	0	0	0	
Dec	1	34252	1	0.47	0	0	0	0	1 ?? Torn ACL
Jan-01	0	34252	1	0.47	0	0	0	0	
Feb	0	47594	1	0.46	0	0	0	0	
Mar	0	34500	1	0.46	0	0	0	0	
Apr	0	33000	1	0.46	1	0	0	0	
May	0	34252	1	0.48	1	0	0	0	
June	3	31510	4	1.92	0	3	0	0	
July	0	31804	4	1.93	0	0	0	0	
Aug	0	30800	4	1.94	3	0	0	0	

Sep	1	31276	5	2.44	1	1	0	0
Oct	0		5	2.66				
Nov	0		5	2.91				
Dec	0		4	2.59				
	0		4	2.91				
	0		4	3.52				
	0		4	4.15				
	0		4	5.01				
	0		4	6.38				
	0		1	2.13				
	0		1	3.22				

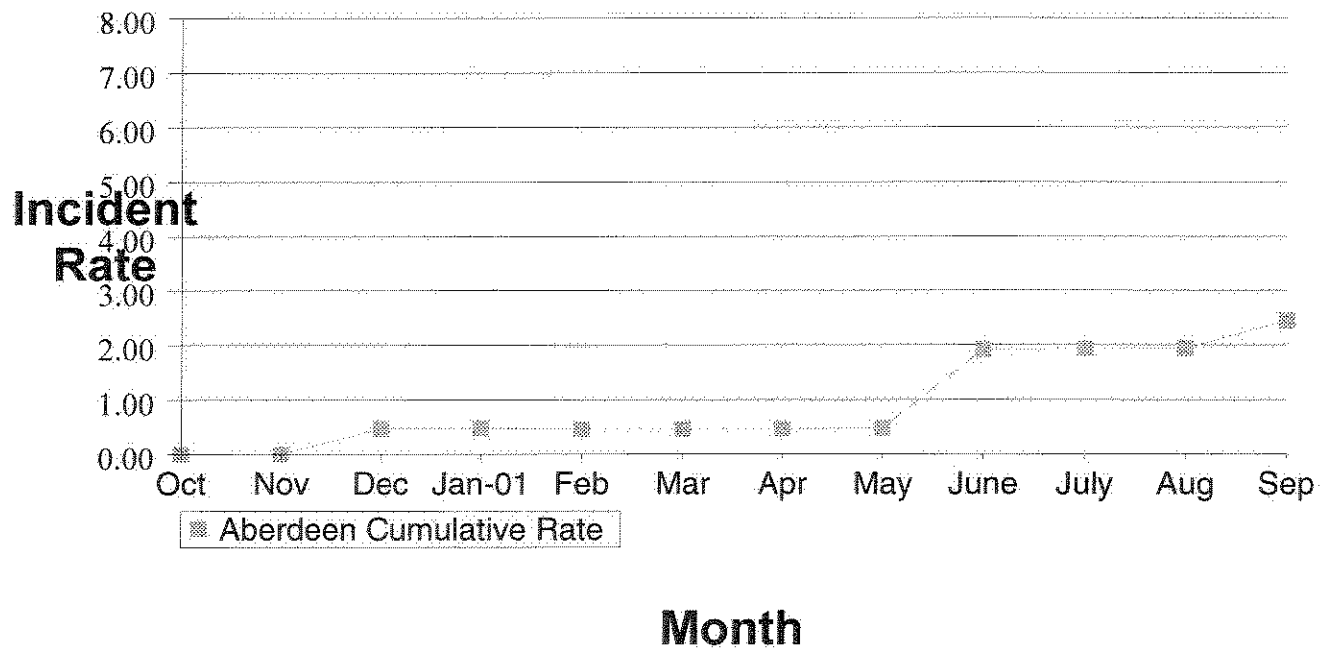
Aberdeen 12 Month Incident Rate



Aberdeen 12 Month Incident Rate: Historical Jan 96 - Current



Aberdeen 12 Month Incident Rate



GGC000100

From: Rory H. Sneed
To: Compound Supervisors
Date: 10/15/01 11:17AM
Subject: Fwd: GGC Aberdeen Monthly Safety Stats

Please make sure you review this data with your shifts. Although none of the recent incidents have been in our department, we still need to be aware of the situation. Thanks.

GGC000101

From: NEEDHAM V. STAHL
To: Honeycutt, Larry D.; Vinyl Op. / Maint.; Vinyl Shift Supervisors
Date: 11/2/01 4:17PM
Subject: Leak Detection Sheet

I have started auditing these sheets. I plan to do this from time to time. I take some of the complete and incomplete sheets for the past few days and compare them to the readings from the GCs. I see that we are still not doing as we should. The following are some of the items that I have seen.

1. The attached shows that the tank farm had readings from around 15:00 on the first of November through 11:30 on the second. The sheet shows only 6 documented readings at four different times, all of which is documented by the same person in two different days. Where was the night shift?
2. I don't see many names of the "Contacted Person" in all the proper slots.
3. I see some single readings that I didn't get a copy of the sheet or they wasn't documented.
4. "Nothing Found" is used far more than it should be. I see this on repeat readings as often as on single readings. In most cases, you have to spend some time in the area before finding the problem.
5. I see "Yes" when ask if a notification is filled out and no notification number to track.
6. I see references to other number. We aren't suppose to do this.
7. I see HNu readings as zero, with "found nothing" in the "Leak Location" slots and "Yes" with no notification number in the next slot. How can this happen?
8. I see where one admit to letting VCM to the atmosphere as a repair.
9. I see in one case, two consecutive readings having contradicting "Repairs Made". What does this tell us???
10. I see notifications written on leaks that have HNu readings less than the GC readings. We should all know this is not correct.
11. I see where the leak location is filled out and nothing else.

I know there has been a lot of controversy about this sheet and how to fill out, but if you follow the letter that I have sent out several times it will be less complicated. Bottom line: Everyone that has any dealing with VCM is responsible to look for, identify, isolate, have repaired, and document the steps taken to correct the problem.

For the Vinyl Supervisors, I suggest that you get familiar with the directions for this sheet. Look on the back of the clip board the sheets are kept on.

CC: AKINS, KENNETH; Carter, Michael L.; Knittig, Doug; Wood, Kelly D.

GGC000102

From: JIMMY AUTREY
To: Nolen, David W.
Date: 11/5/01 1:48PM
Subject: Re: vcm

I'm trying to follow up, has this been completed or are we still needing to do something here?

>>> David W. Nolen 08/27/01 08:46AM >>>

I turned in a safety item about a leak on the GC in the old unit control room. I had walked into the room when it was full of vcm gas. This was caused by tubing leaking from the gc that samples the gas going to the incinerator. Can you tell me what is happening to this request.

David Nolen

GGC000103

From: RODNEY B. STRICKLAND
To: Markerson, Chris M.
Date: 11/5/01 4:50PM
Subject: 6A COOLING TOWER

AT about 15:00 PM Charlie Holcomb and David Roberts told me (Rodney Strickland) that they had smelled VCM. at 6A cooling tower. At this time I had T. Moffett check with a HNU. I also had C. Brownlee check with a HNU later. Nothing was found ! We also caught a sample of 6A cooling tower water for lab results. Witch should be ready on 11-06-01.

Rodney Strickland

CC: Knittig, Doug; STAHL, NEEDHAM V.

GGC000104

From: SAMUEL BROWN
To: AUTREY, JIMMY
Date: 11/7/01 3:38PM
Subject: Fwd: Re: vcm

I talked with David about a GC sample from this room.

>>> JIMMY AUTREY 11/07/01 02:48PM >>>

About when DWN stepped into the GC room and there had been a leak and the room was full of VC. We were looking at maybe putting some kind of detection in the room to indicate if there was a problem before anyone went in there.

>>> SAMUEL BROWN 11/07/01 01:54PM >>>

what are we talking about?

>>> JIMMY AUTREY 11/07/01 07:52AM >>>

Has anything been done on this?

GGC000105

From: Michael L. Carter
To: AKINS, KENNETH
Date: 11/7/01 3:07PM
Subject: Leak Survey

Kenny, have we ever or do we still conduct a flange and valve leak survey? If we do - what is the area covered and frequency? If we don't - can we? I would like to see the tank farm area surveyed. We have been fighting valve leaks, fitting leaks, small hose leaks for the past two weeks. I'm sure these have been around for some time. I think we have valves out there that may have never been changed out. We also have had some fittings break off due to fatigue from vibration. Please let me know. The survey would need to include the unloading rack area. I was thinking Co-Ops?

Michael

CC: Markerson, Chris M.

GGC000106

From: DAVE GOLDSMITH
To: BRANDON NADLER
Date: 11/15/01 4:13PM
Subject: Re: HON Cooling Tower Requirements

Yes, Julie has repented of misleading you. Both are required quarterly. The rest of the time we only need to sample one.

>>> BRANDON NADLER 11/15/01 04:11PM >>>

I was not attempting to dispute the requirement. I was only trying to clarify if we needed to sample the inlet, the outlet, or the inlet and the outlet. We were previously of the understanding that the daily samples that we caught satisfied the HON requirements.
Brandon

>>> DAVE GOLDSMITH 11/15/01 03:33PM >>>

I can't argue your point other than the reg requires both inlet and outlet quarterly, logic notwithstanding.

>>> BRANDON NADLER 11/15/01 03:31PM >>>

Dave,

We sample the RETURN from the unit which is the INLET to the cooling tower. Our logic is that if there is a leak in the unit that this will have the highest concentration of organics. We know that most of the organics in the water (if there is a leak) will strip to the atmosphere due to the large air flow through the tower. We do not sample the SUPPLY or OUTLET from the cooling tower unless we detect high levels of organics in the RETURN from the unit. When we detect high concentrations that we suspect a leak, we sample the inlet and outlet to determine 1) the leakage rate of organics into the water and 2) the rate of stripping of organics into the atmosphere. Is this sufficient, or do we need catch the RETURN and SUPPLY lines?

Brandon

>>> DAVE GOLDSMITH 11/15/01 02:53PM >>>

It was Julie that brought this up. We must also sample the inlet quarterly to meet the wording of the reg.

>>> BRANDON NADLER 11/15/01 02:01PM >>>

Dave,

We sample the cooling tower daily. We only catch the return from the unit, and it is analyzed using the same method that we use for the east ditch. In previous discussions, I believe with Julie, we were of the impression that this satisfied the HON regulations around sampling for organics in the cooling tower.
Brandon

>>> DAVE GOLDSMITH 11/14/01 08:50AM >>>

While reviewing our procedures, it has come to our attention that HON requires additional testing of our cooling tower water.

Applicability: cooling towers in VCM and phenol.

Requirements: As soon as possible, take three samples each of entrance and exit to the cooling towers. I recommend an hour between each set of samples. (Exit and entrance samples should be taken at the same time, of course.) For phenol, this exercise should be repeated when the plant is back up and lined out. Samples should be analyzed for TCH in VCM and phenol, acetone, methanol, cumene, and AMS in phenol. Samples must be analyzed by an approved part 136 method (citation 40 CFR 63.104(b)(3).

Hereafter, sampling should be done each calendar quarter (citation 40 CFR 63.104(b)(5).

Environmental standard 250 will be revised accordingly.

GGC000107

For additional assistance, please contact Anthony at 2594 for laboratory methods or Dave at 2677 for other questions.

Thanks, Dave

GGC000108

From: BRANDON NADLER
To: FARHO, STEVE
Date: 11/15/01 4:17PM
Subject: Fwd: Re: HON Cooling Tower Requirements

I finally think that I'm straight on the cooling tower sampling requirements.
We must get a snapshot sample of the INLET and OUTLET of the cooling tower on a quarterly basis.
Any thoughts?
Brandon

GGC000109

From: Michael L. Carter
To: BAGWELL, AMY; Carter, Beverly S.; COX, MICHELLE; Harlow, Jimmy R.;
Honeycutt, Larry D.; Walters, Kimberly W.
Date: 12/4/01 9:35AM
Subject: Safety Tickets

We are starting the safety ticket effort this month. Please remember only salary employees will complete one of these each month. If you complete more - that's ok. Please see me if you don't have a safety ticket book. How to complete - this is when you observe a job or person completing a task safely - complete the ticket and give the ticket to the person(s) to allow them to put it in the box for the safety drawings. Call if you have questions.

Michael

GGC000110

From: BRANDON NADLER
To: MCKNEELY, LJ
Date: 12/4/01 2:46PM
Subject: Lab Assistance

L.J.,

We have speculated that thiosulfate used in VCM may decompose or react with CHP in the BST. We would like to understand if thiosulfate may be a means to eliminate CHP in the wastewater stream from the phenol unit. Can we perform some lab scale testing to determine if this is a possible route to eliminate CHP going to the bio-treatment system?

Thanks,
Brandon

GGC000111

From: Chris M. Markerson
To: Supervisors2001
Date: 12/28/01 9:54AM
Subject: Safety Tickets

The following are the safety ticket results for the period ending 12/20/01:

Two tickets were drawn for prizes:

Robert Williams was recognized by Mike Langford.

Freddie Franks was recognized by Jimmy Autrey.

During the period, 74 safety tickets were issued by the following departments:

Vinyl - 35
Safety - 14
Maint. - 9
Yard, Warehouse, Lab - 6
Controls engineering - 5
Compound - 5

The next drawing will be held on January 4, 2002. Two names will be drawn at this time.

CMM

GGC000112

From: Michael L. Carter
To: BAGWELL, AMY; Carter, Beverly S.; Carter, Michael L.; Harlow, Jimmy R.;
Honeycutt, Larry D.
Date: 1/22/02
Time: 1:30PM - 2:00PM
Subject: Safety tickets, Safety Audits
Place: mlc office

We will discuss safety tickets and safety audits. Also discuss strike training, and safety training.

Michael

GGC000113

From: MICHEAL BARNES
To: ABERDEEN GROUP
Start: 1/25/02
Due: 1/25/02
Subject: Emergency Medical Responder Training

An Emergency Medical Responder course will be given in the plant in February. Anyone interested in taking the course is welcome. This is not for membership on the ERT. We presently have a full team and are not accepting new members. Anyone interested should e-mail me as soon as possible. The dates for the class are Feb. 18, 20, 22, 25, 27 and Mar 1. Each class day will be 8 hours.

GGC000114

From: Michael L. Carter
To: BAGWELL, AMY; Carter, Beverly S.; COX, MICHELLE; Harlow, Jimmy R.;
Honeycutt, Larry D.; PALMER, SHARON O.; Walters, Kimberly W.
Date: 1/28/02 3:28PM
Subject: Fwd: Safety Training - January

Please see attached. Please plan on attending training. Also, each supervisor should make sure each of their respective employees attend.

Michael

GGC000115

From: Chris M. Markerson
To: ABERDEEN GROUP
Date: 1/28/02 8:37AM
Subject: Safety Training - January

Note: Training will be held in the Auditorium

The safety training topic for January is Injury and Illness Reporting. This training will be presented by the safety department as per the attached schedule:

January 25th @ 7:00 a.m. Maintenance (Completed)

January 31st @ 1:00 p.m. Day Employees (Office, Lab, Warehouse, etc.)

January 31st @ 6:00 p.m. Vinyl/Yard/Lab/Utilities "C" Shift
Compound / Lab Shift 2

January 31st @ 7:00 p.m. Vinyl/Yard/Lab/Utilities "D" Shift
Compound / Lab Shift 1

February 4th @ 6:00 p.m. Vinyl/Yard/Lab/Utilities "B" Shift

February 4th @ 7:00 p.m. Vinyl/Yard/Lab/Utilities "A" Shift
Compound / Lab Shift 3

GGC000116

From: Michael L. Carter
To: BAGWELL, AMY; Carter, Beverly S.; Harlow, Jimmy R.; Honeycutt, Larry D.
Date: 1/28/02 1:37PM
Subject: Safety Audits

I wanted to follow up on our conversation from our last meeting concerning safety audits. Everyone in your respective groups needs to complete one safety audit per month. I would ask that you pass these to me for the time being, I will forward to appropriate folks. I want to review these for a period of time. I ask that you review prior to passing to me. If you have any questions, please let me know. If you want to, you can wait until February to get started. I would ask that each of you complete one for January.

Michael

GGC000117

From: JOE BEALL
To: DURRETT, MARK
Date: 2/1/02 8:24AM
Subject: Re: Fwd: Safety Performance

Mark , I got Ed's note to Bill and Bill's note to you asking "What do you think we should do to make out results sustainable?" I know I'm singing to the choir but there are some fundamental things that have to be done during the employment process.

1. Safety starts day one with the applicant screening and interviewing process. Simple questions give you and idea of the applicants attitude. For example, " Tell me how you manage your personal safety on the job?" That question can lead to multiple questions to determine safety attitude. We've got to train people involved in the interviewing process on how to conduct an interview with safety in mind.

2. Pre-employment testing, ie, aptitude, safety awareness, skills assessment. We're not consistent it this area across the division.

3. Pre-employment physical assessments, including physicals and drug screens. Again I'm not sure how well we do this across the division.

4. A well defined safety orientation process. It is my opinion, the first day of employment or more is entirely safety orientation, exceptions, performance and consequences. Pretty sure we not there yet on this item.

Now you can load the pipeline with great people but the attitude and response from existing employees is what will sustain the efforts. I know Chris is working such ideas.

Thoughts of the day, Joe

>>> MARK DURRETT 01/31/02 11:09AM >>>

FYI, please see attachments concerning safety awareness and priorities.

CC: Markerson, Chris M.

GGC000118

From: Michael L. Carter
To: BAGWELL, AMY; Carter, Beverly S.; COX, MICHELLE; Harlow, Jimmy R.;
Honeycutt, Larry D.; PALMER, SHARON O.; Walters, Kimberly W.
Date: 2/8/02 2:40PM
Subject: Safety Tickets/Safety audits

Please be reminded that each of us is targeted to complete a safety ticket a week. Also - supervisors - each of your hourly folks is targeted to complete a safety audit per month (Today is 2/8). I have not seen any safety audits as of today for February.

Michael

GGC000119

2002 PVC Fugitive Emissions Discussion
February 11, 2002, 09:00

1. Attendees:

PVC-	Roger Massey	Alonzo Coleman	
Maintenance-	Red Fruge'	Brandon Willis	
Environmental-	Dennis Fec	Anthony Fugarino	Hillary Garner

2. Background - In year 2001, we reported 5.5 tons of vinyl fugitive emissions. In 2002, we increased monitoring to every component each quarter. Additionally, the Fetteroff valves had been identified as repeat leakers and modifications were made to the packing. As a result, for year 2002 we will report 3.2675 tons of vinyl fugitive emissions as compared to our permit limit of 3.6 tons. Although huge strides were made in emissions reduction, we are still close to our permit limit. If one agitator had been found leaking with a screening value >10,000 ppm (pegged value) or four more connectors had been found to have been leaking at a pegged value, we would have potentially exceeded our permitted limit.

In year 2002, connectors contributed to 83% of our total emission and valves contributed 13.8%. Agitators, compressors, instrumentation systems, and pumps all contributed 1 percent or less each. On average for year 2002, one connector contributed 0.597 lb/yr and on valve contributed 0.309 lb/yr.

All things being equal to circumstances in year 2002, our baseline emission, or minimum emission, would be approximately 900 pounds.

3. Options for Reduction - Some of the potential options to further reduce the emission in the future are as follows:

- Investigate leaker history, determine if type of component or use of component is contributing to habitual leaking.
- Increase monitoring of all components to 5 times per year.
- Lowering the "leak" value from 500 ppm and fix components leaking at lower rates.
- Fix all leaking components the day they are discovered.
- Install no leak valves or eliminate valves when possible.
- Weld and eliminated flanges when possible.
- Have LDAR or the PVC leak patrol monitor components during and/or after any maintenance activity involving LDAR components.
- Determine amount of time of LDAR lines.
- Reevaluate LDAR components, change where appropriate to <300 hour systems.
- Preform an additional bagging study to get lower baseline calculations. However, this could result in a higher baseline calculation.

4. Action Items -

- PVC and the LDAR technicians have already scheduled a review of lines that are considered to be in service <300 hours. At that time with input from environmental, they also plan to reevaluate the lines currently considered to be in LDAR service to see if there is

opportunity to remove components not covered by the LDAR regulations.

- The LDAR office will provide the PVC unit with a list of historical leakers prior to this meeting Environmental.

- Maintenance is scheduling to monitor the PVC unit as soon as possible in anticipation that there will be a greater number of leaking components after the shutdown. Monitoring as soon as possible after the shutdown will reduce the time that must be considered for each leaking component.

- PVC should provide environmental with a date range of downtime that the unit was completely evacuated.

- PVC will be able to take advantage of the month of downtime by taking that time out of the calculations.

- Maintenance is planning for a fifth monitoring of the PVC unit for year 2002.

- PVC is to determine if tracking of down time of lines and/or equipment that have been completely evacuated of vinyl service is possible. Additional work will be required in the set up of the LDAR database to be able to take advantage of this.

- Environmental will locate literature from vendors concerning wraps for connectors to prevent leaking.

From: Michael L. Carter
To: Honeycutt, Larry D.
Date: 2/20/02 9:50AM
Subject: Safety Audits

Please don't forget about the safety audits for February. Each employee needs to complete one - including me and you.

Michael

GGC000122

From: Michael L. Carter
To: BAGWELL, AMY
Date: 2/20/02 10:35AM
Subject: Re: Fwd: Safety Audits

Yes they are! Let me know if you need any support in talking with them.

Michael

>>> AMY BAGWELL 02/20/02 10:21AM >>>

Some of the Lab employees are asking if doing these audits is mandantory

Let me know please.

GGC000123

From: Michael L. Carter
To: BAGWELL, AMY; Carter, Beverly S.; Harlow, Jimmy R.; Honeycutt, Larry D.
Date: 2/28/02 2:29PM
Subject: safety audits

All areas turned in safety audits for February - Thanks

Michael

GGC000124

From: MICHAEL G. LANGFORD
To: CALDWELL, WILLIAM (BILL)
Date: 3/7/02 3:04AM
Subject: Re: Dosimetry

BILL CHRIS WAS ON OVERTIME HE WAS A OPERATOR ON B SHIFT A OPERATOR OLD MODULE.
THANK YOU MIKE

>>> WILLIAM (BILL) CALDWELL 03/06/02 04:01PM >>>
Mike,

Chris White had an overexposure on the 26th - day shift. He did not indicate on the card what job he was working that day. Could you please find out and let me know.

Thanks

GGC000125

From: Chris M. Markerson
To: ABERDEEN GROUP
Date: 3/19/02 12:09PM
Subject: Safety

The Aberdeen Plant has completed 4+ months without a recordable injury. To recognize this accomplishment, we will light up the grill and have a hamburger / chicken breast lunch on Friday, March 22. Mr. Charlie will supply all the fixins and we will do the cooking.

Arrangements will be made to recongize off shift employees as well.

Congratulations on 4 months of Safe Work and Thank You for your efforts.

GGC000126

From: NEEDHAM V. STAHL
To: Markerson, Chris M.; Vinyl Op. / Maint.; Vinyl Shift Supervisors; Wood, Kelly D.
Date: 4/8/02 1:27PM
Subject: Top 5 Safety Items

The attached is an update version of the remaining items from 2001 operator surveys. Each of us have at least one item to review and complete. These items are important to operators or they would not be on the list.

Thanks in advance for your input.

CC: Knittig, Doug

GGC000129

From: SAMUEL BROWN
To: Harlow, Jimmy R.
Date: 4/9/02 2:30PM
Subject: 4025802

Need some of these in store house can you help? stock #4025802 flex kleen solenoid valves for dryer baghouses this is a dusting/EPA and production problem. Let me know when some will arrive so I can inform vinyl. Thanks.

GGC000130

From: Joseph B. Hegwood
To: DEMAND, JIM
Date: 4/16/02 7:51AM
Subject: Re: Requisition #17435

This is the new Gas Chromatograph that replaces on of the three remaining obsolete units in the Vinyl area. We can no longer get parts and services for our existing units. These units are used for area monitoring per EPA regulation. If you have any other questions please let me know.

Joseph B. Hegwood
Plant Engineer

>>> JIM DEMAND 04/16/02 07:47AM >>>

Have a request for \$70,296 for a Daniel's instrument system. Please give me some details on the purpose and planned use.

Jim

CC: Knittig, Doug

GGC000131

From: Chris M. Markerson
To: ABERDEEN GROUP
Date: 5/6/02 11:19AM
Subject: Facial Hair Policy

Please see the attached.

CMM

GGC000132

Georgia Gulf

Corporation & Affiliates

To: All Employees

From: Chris M. Markerson

Date: May 6, 2002

Subject: Respiratory Protection – Facial Hair Policy

In recent weeks, I have received many questions regarding the Aberdeen Plant's facial hair policy. This memo is intended to provide clarification on this issue.

OSHA's Respiratory Protection Standard states the following:

The employer shall not permit respirators with tight-fitting facepieces to be worn by employees who have:

(g)(1)(i)(A)

Facial hair that comes between the sealing surface of the facepiece and the face or that interferes with valve function; or

(g)(1)(i)(B)

Any condition that interferes with the face-to-facepiece seal or valve function.

Based on this standard, the Aberdeen Plant's policy with regard to facial hair is that all Georgia Gulf employees shall be clean-shaven in the respirator seal area when reporting to work. The Aberdeen plant permits Georgia Gulf employees to wear mustaches, but does not approve of beards, long sideburns (which extend into the respirator sealing surface area), goatees, long mustaches (which extend into the respirator sealing surface area), or any other facial hair in the respirator sealing surface area or facial hair which interferes with a respirator's valve function.

Each Georgia Gulf employee shall be aware of these requirements and take the appropriate action to comply with the plant policy.

If you should have any further questions on this matter, please contact your supervisor or the Safety Department.

Chris M. Markerson
Safety & Health Manager

GGC000133

From: NEEDHAM V. STAHL
To: Vinyl Op. / Maint.; Vinyl Shift Supervisors
Date: 5/8/02 10:03AM
Subject: Dusting Incidents

We aren't putting any resin out, we're keeping it all in the system and going into cars... at least this is what the sheet that I track dusting on is showing me. Nothing since 3/25/02. Is this correct???

GGC000134

From: WILLIAM (BILL) CALDWELL
To: BARNES, MICHEAL; BLAKE, CHARLES N; Ewing, Chris D.; Haynes, Coleman;
Honeycutt, Larry D.; HOOPER, DANIEL J.; Hull, John D.; LANCASTER, TAMMY; LANGFORD,
MICHAEL G.; MCGEE, BERNARD; Morgan Jr., Erskin A.; POLK, CHARLIE L.; PRITCHETT,
ANTHONY R.; SHELNUT, DEMUS W.; Staten, Thomas R.; STRICKLAND, RODNEY B.
Date: 5/20/02 3:45PM
Subject: VCM Dosimetry Schedule

The following employees are on the VCM Dosimetry schedule for the month of May. Please make sure you pick up and return your dosimetry badge on the day scheduled. List attached.

GGC000135

From: Rory H. Sneed
To: Compound Dept.
Date: 6/7/02 9:35AM
Subject: 3 Years with No OSHA Recordable Injuries

As of June 5, 2002, the Compound Dept. has now complete 3 years without an OSHA recordable injury. This is an outstanding accomplishment, especially considering all of the changes we've experience during this period, and you should all be recognized and commended for your contribution. It's obvious that all of you make safety a top priority in your jobs, and I encourage you to continue your efforts. We will be preparing some type of recognition for this accomplishment over the next few weeks.

Congratulations and keep up the good work!

CC: BEALL, JOE; CALDWELL, WILLIAM (BILL); DURRETT, MARK; Markerson, Chris M.; NADLER, BRANDON

GGC000136

From: STEVE VARNADO
To: ABERDEEN GROUP; ATLANTA; BATON ROUGE; GALLMAN GROUP;
HOUSTON; LAWRENCEVILLE; MADISON GROUP; NORTHAMPLASTICS; OKLAHOMA CITY
GROUP; PASADENA; PLAQUEMINE ADM; PLAQUEMINE CAD; PLAQUEMINE ENV;
PLAQUEMINE MNT; PLAQUEMINE PVC; PRAIRIE GROUP; TIPTONVILLE; WESTLAKE GROUP
Date: 6/11/02 9:32AM
Subject: **Material Safety Data Sheets (MSDS) On GG Intranet**

You are probably aware that Georgia Gulf product MSDS's are now available on our Intranet Web Page. Please bear in mind that **these are for employee use only. Please do not copy and send to customers or others outside the company.** The tracking and documentation requirements for the MSDS's necessitate that the H&S Department handle customer and other requests from outside the company.

If you haven't done so yet, you can access our MSDS's by going to the Georgia Gulf Intranet Home Page and then clicking on the EHS link.

Thanks for your cooperation with this process.

Steve

GGC000137

From: WILLIAM (BILL) CALDWELL
To: BOWLES, DONALD; BROWN, SAMUEL; COOPER, ANTHONY M; Covington Jr., Roland David; EICHENSER, PAT; Ewing, Chris D.; Hull, John D.; KENNEDY, PAUL J; LANCASTER, TAMMY; LANGFORD, MICHAEL G.; Malone, Will R.; MCGEE, BERNARD; Nolen, David W.; OLIVER, GREGORY A.; OWEN JR, JERRY B.; Peden Jr., Charlie B.; WHITE, CHRISTOPHER T; WILLIAMS, ROBERT L.
Date: 6/20/02 11:06AM
Subject: June VCM Dosimetry

Attached is the VCM dosimetry schedule for next week.

If you are scheduled to wear a Dosimetry badge please pick it up at the start of your shift and return it when you leave.

GGC000138

From: NEEDHAM V. STAHL
To: Vinyl Op. / Maint.; Vinyl Shift Supervisors
Date: 6/20/02 1:50PM
Subject: Vinyl Safety

We have been trying to come up with different ideas to better our safety performance and knowledge. One idea that we have to gather a group of people, one per shift and one from days, to learn in greater detail safety procedures, processes, etc. and the reasons for these items. Then relay the information back to their shift.

If you would, see who would be interested in representing their shift in such a group. E-mail me back.

CC: Knittig, Doug; Wood, Kelly D.

GGC000139

<u>Date</u>	<u>Silo Overfill</u>	<u>Transfer Line</u>	<u>Dryer Related</u>	<u>Other</u>
5/5/99	692			
5/5/99	493			
5/6/99				684 silo valve open
5/25/99		600's		Coupling
5/28/99		689		
5/30/99				FB Dryer lost control of dampers
5/30/99	692			
6/1/99	493			Truck blowing material
6/3/99		689		Coupling
6/3/99		689		Coupling/Truck blowing material
6/3/99	677			
6/3/99	493			
6/10/99	475			
6/12/99	683			
6/14/99	475			
6/21/99		600's		Coupling
6/24/99	689			
7/30/99			X	#10 Scrubber/ Dryer backed up
7/30/99		686		Coupling
8/7/99		692		Coupling failure twice
8/10/99				Big Pit flex hose
8/11/99		676		
9/10/99		600's		
9/18/99				600 series silo lids lifting
9/21/99			X	#5 baghouse
9/22/99	680			
10/17/99	692			Dusting from lid
10/19/99		#4 dryer		Coupling
12/17/99	692			Dusting from lid
12/23/99		692		Coupling
12/28/99		X		V-11 transfer line coupling
1/15/00	479			
1/20/00		690		Coupling
1/20/00	682			
1/21/00			X	#11 Dryer backed up
1/23/00		689		Coupling
2/10/00			X	#11 Dryer backed up
2/20/00				676 Silo lid dusting
2/20/00				686 Silo lid dusting
2/28/00		690		Replacing coupling with flanges
3/1/00		689		
3/6/00				676 Silo lid dusting
3/7/00				687 Silo baghouse cracked
3/7/00				681 Silo lid dusting
3/12/00		475		
3/21/00		282		Coupling leaking
	<u>Silo</u>	<u>Transfer</u>	<u>Dryer</u>	<u>Other</u>

<u>Date</u>	<u>Overfill</u>	<u>Line</u>	<u>Related</u>	
3/21/00		282		Coupling leaking
3/23/00		679		Coupling leaking
3/27/00			X	North Fluid Bed transfer- Teeth stripped on sprocket
4/1/00		686		Coupling leaking
4/1/00		282		Coupling leaking
4/7/00		282		Coupling leaking at rotary valve
4/10/00			X	# 6 baghouse-socks leaking
4/12/00				281 lid lifting
4/13/00		690		Coupling leaking
4/22/00		282		Transfer line came apart in two places
5/10/00		282		Transfer line came apart- same as above.
5/16/00				679 Silo lid lifting
5/18/00				679 & 680 lids lifting
6/5/00		282		Star valve vent hose fell off - app. 8,000# of resin on ground.
7/12/00		282		Transfer line came apart at elbow.
7/13/00		282		Same as above.
7/15/00	493			Compound power problem.
7/17/00	691			Level showed 71% - calibrated.
7/18/00				575 silo lid lifted.
8/7/00	281			Ran over at 83%. Instrument Techs calibrated.
8/11/00	692			Ran over at 82%. Instrument Techs calibrated.
9/17/00				493 lid leaking.
9/18/00				576 silo leaking around baghouse base.
10/24/00				692 baghouse
1/6/01	689			Silo showed empty.
1/14/01	691			Ran over at 69%
1/14/01		683		Coupling leak
1/28/01				688 lid lifting.
3/21/01	691			Ran over at 45%. Found broken wires on top of silo.
4/11/01	688			Lid lifting when pulses
<u>Date</u>	<u>Silo Overfill</u>	<u>Transfer Line</u>	<u>Dryer Related</u>	<u>Other</u>

From: James A. Little
To: CALDWELL, WILLIAM (BILL); Dobbins, Dwight; KIELMAN, TRACE; Markerson, Chris M.
Date: 6/21/02 7:22AM
Subject: RailCar Incident Articles

Just a heads up for what may be in store for your off-site hazmat team. This past Saturday morning the local KCS rail yard called that a vcm railcar was leaking. We found the dome seal was still intact and no indication that the car was leaking before it left the plant Friday evening. The liquid valve plug was removed and the valve cracked open. Needless to say ice was built up along both sides of the car.

Anyway, here are two articles in today's Lake Charles American Press that ran a story on the incident and another story on rail yard security.

Jim

<http://www.americanpress.com/news/docs/news01.shtml>
<http://www.americanpress.com/news/docs/news03.shtml>

GGC000142

From: BRANDON NADLER
To: DEMAND, JIM
Date: 6/24/02 7:30AM
Subject: Surprise DEQ / EPA visit

Jim,

The Mississippi DEQ and Region 4 EPA made a surprise visit to the plant late last week. They noted and plan to cite the following:

1. Some oily rags and work gloves in industrial waste trash cans. These were rags used in the field when pulling and/or installing equipment and used to wipe up or clean up, not oil absorbent pads used to clean up a spill.
2. An oil bucket in motor pool used to drain oil from equipment was not labeled.
3. Failed to notify DEQ when we moved from a small quantity to large quantity disposal. I'm not sure what type of waste this is for. I need to sit down with Kenny and learn about this one.

They also noted, but stated that they would have to investigate to determine if these were violations.

1. Used railroad cross ties stacked in the yard. The claim is potential leaching of creosote into the ground. We are not aware of any regulation to prevent us from storing used ties until we have enough to warrant disposal.
2. The EPA representative stated that wash water from hydroblasting must be disposed of as a hazardous waste because it is contaminate with residue from the reactor. We are of the understanding that there is a definition in the regulations for maintenance wastewater, and it is permissible to send it through our biological treatment facility.

I believe that the Plaquemine handles these last two items in the same manner as Aberdeen, and has the same interperatation as Aberdeen. We will implement corrective actions on the first group of items as appropriate. We will review the regulations on the second group of items to determine if these interpretations are correct.

Brandon

CC: KAVANAGH, COLEMAN

GGC000143

From: WILLIAM (BILL) CALDWELL
To: BOWLES, DONALD; Corbell, Timothy H.; EICHENSER, PAT; Ewing, Chris D.;
KENNEDY, PAUL J.; LANCASTER, TAMMY; LANGFORD, MICHAEL G.; MCGEE, BERNARD; Nolen,
David W.; OLIVER, GREGORY A.; OWEN JR, JERRY B.; Pulliam, James E.; RODGERS, JOHN D.;
SHIELDS, JEFFERY C.; WILLIAMS, ROBERT L.
Date: 6/24/02 10:30AM
Subject: June Dosemetry Revision

If you received one please disregard the Dosimetry list sent out last Friday. Attached is the corrected list for this month.. Sorry about the confusion.

GGC000144

From: BRANDON NADLER
To: DEMAND, JIM
Date: 6/24/02 2:36PM
Subject: Re: Surprise DEQ / EPA visit

Thanks for the feedback.

On the small quantity vs. large quantity, it seems that if you dispose of less than 2200 lbs per month of hazardous waste you are a small quantity disposer. Aberdeen is almost always a small quantity disposer, but has occasionally gone over 2200 lbs. When this happens we are supposed to send a letter to the DEQ notifying them that we were a large quantity disposer that month. We are going to consider changing our status to a large quantity disposer so we don't have to worry about this each month. This assumes that there are no other ramifications of changing our status to large quantity.

We are following up with the DEQ and EPA to determine if they are going to stick to their interpretation regarding maintenance water. We believe that this is well defined and will be easy to take a stand on.

>>> JIM DEMAND 06/24/02 12:57PM >>>

Brandon,

On the rail ties, conferring with Dave Goldsmith, would suggest that we take a sample of the rail road ties and run a TCLP for cresols. This would tell you wether or not a real concern exists. He further suggested that we not store on the ground to remove the concern - perhaps a dumpster or other storage device.

On the second item, it would seem that our conclusions are the same as yours. If you would like, have Kenny contact Dave and discuss.

Jim

>>> BRANDON NADLER 06/24/02 08:30AM >>>

Jim,

The Mississippi DEQ and Region 4 EPA made a surprise visit to the plant late last week. They noted and plan to cite the following:

1. Some oily rags and work gloves in industrial waste trash cans. These were rags used in the field when pulling and/or installing equipment and used to wipe up or clean up, not oil absorbent pads used to clean up a spill.
2. An oil bucket in motor pool used to drain oil from equipment was not labeled.
3. Failed to notify DEQ when we moved from a small quantity to large quantity disposal. I'm not sure what type of waste this is for. I need to sit down with Kenny and learn about this one.

They also noted, but stated that they would have to investigate to determine if these were violations.

1. Used railroad cross ties stacked in the yard. The claim is potential leaching of creosote into the ground. We are not aware of any regulation to prevent us from storing used ties until we have enough to warrant disposal.
2. The EPA representative stated that wash water from hydroblasting must be disposed of as a hazardous waste because it is contaminate with residue from the reactor. We are of the understanding that there is a definition in the regulations for maintenance wastewater, and it is permissible to send it through our biological treatment facility.

I believe that the Plaquemine handles these last two items in the same manner as Aberdeen, and has

GGC000145

the same interpretation as Aberdeen. We will implement corrective actions on the first group of items as appropriate. We will review the regulations on the second group of items to determine if these interpretations are correct.

Brandon

GGC000146

From: Charles W. Holcomb
To: AUTREY, JIMMY
Date: 7/9/02 9:08AM
Subject: sweeping roads makes unnessesary dust

I would like to express my dislike of the practice of sweeping the roadways around the plant. This just adds to the problem of dust in the air and contributes to the failing health of the employees. There are lots of alternative methods of cleaning the streets. Vacuuming or washing with water for instance. Why not use a tank of water on a truck or trailer with a header on the back with holes drilled in it to let water pour out and onto the streets? I know it is important to present a clean plant, but there are better ways to do this other than sweeping the resin and dirt up into the air.

CC: BROWN, SAMUEL

GGC000155

From: JIMMY AUTREY
To: Holcomb, Charles W.
Date: 7/9/02 10:10AM
Subject: Re: sweeping roads makes unnecessesary dust

I have instructed Jacob Lee to cease sweeping the streets in the conventional manner in which we have done this in the past. CMM and I intend to research other options which may include water spray and/or vacuum. Thank you for bringing this matter to our attention.

>>> Charles W. Holcomb 07/09/02 10:08AM >>>

I would like to express my dislike of the practice of sweeping the roadways around the plant. This just adds to the problem of dust in the air and contributes to the failing health of the employees. There are lots of alternative methods of cleaning the streets. Vacuuming or washing with water for instance. Why not use a tank of water on a truck or trailer with a header on the back with holes drilled in it to let water pour out and onto the streets? I know it is important to present a clean plant, but there are better ways to do this other than sweeping the resin and dirt up into the air.

CC: BEALL, JOE; BROWN, SAMUEL; Markerson, Chris M.; NADLER, BRANDON

GGC000156

From: JOE BEALL
To: AKINS, KENNETH; AUTREY, JIMMY; BEALL, JOE; Carter, Michael L.; KNITTIG, Amy E.; Knittig, Doug; Markerson, Chris M.; NADLER, BRANDON; Sneed, Rory H.
Date: 7/9/02 8:11AM
Subject: Employee Meetings

We talked about holding employee meetings to give a state of the union speech and reemphasize our safety objectives. The best dates appear to be the last week in July and first week in August.

Tuesday, 7/30
7:00 AM B shift & Day employees
9:00 AM Day & Office employees

Thursday, 8/1
7:00 AM D shift, Day & Office

Tuesday, 8/6
7:00 AM A shift & Day Employees

Thursday, 8/8
7:00 AM C Shift & Day Employees
9:00 AM Day and Office

The schedule is planned for the incoming shift to attend the meeting. Employee will be paid to attend.

Please reply with any comments or suggested topics of discussion. We'll post a notice next week.

GGC000157

WILLIAM (BILL) CALDWELL
Area Supervisors; Department Heads
7/11/02 2:31PM
Respirator Fit Test Schedule Revised

Attached is the correctly dated schedule for the respirator fit testing.

Please post the correct one and schedule your people as needed.

GGC000158

From: WILLIAM (BILL) CALDWELL
To: SARGENT, SHEA P
Date: 8/16/02 2:46PM
Subject: VCM Dosimetry

I faxed you the report from RJ Lee. We had a high one. Horace Lindsey was a 4.64 ppm. I have given Dean the overexposure letter and investigation form. Billy Bob was a .901.

I also just got the results from the last batch of lead samples I did on the 13th. They all came back less than 1.1 micro grams per cubic meter. The other samples we did, including the really dusty one will be done Monday.

GGC000159

From: WILLIAM (BILL) CALDWELL
To: SARGENT, SHEA P
Date: 8/20/02 6:52AM
Subject: Area samples

I got the results for the area samples done on the 5th and the 7th. The results on the 5th were non-detects on each floor. The maintenance work done on the 7th stirred up a lot of dust with the third floor being the worst. The analysis numbers showed the effect of that work. On the 7th the third floor tested 64.7 micrograms and the fourth floor had a 26.6 and a 31.4.

I will give these number to Rory and the supervisors with the suggestion that any major cleanup or maintenance activity be done with respiratory protection until or if we get to the point of having those areas clean enough to be confident that the lead levels are significantly reduced.

CC: Markerson, Chris M.

GGC000161

From: WILLIAM (BILL) CALDWELL
To: WELLS, PATRICIA A.
Date: 8/28/02 9:54AM
Subject: Re: C.B.T.s

I would think it still applies to maintenance since that work in compound has the highest potential to cause a lot of air born dust and possible exposures above the PEL.

We recommended that respiratory protection be part of the permitting requirements when working on those floors.

As far as the lab goes if they are still using lead in the resin hard particle testing I would recommend that we keep our lead awareness intact.

GGC000162

From: NEEDHAM V. STAHL
To: PERRY, DARNELL
Date: 9/5/02 12:56PM
Subject: PPE

I hope operators were wearing their respirators when they dumped the coarse batches. You had readings from this material, according to the leak detection log. We have to force people to wear equipment (PPEs) to protect ourselves later.

GGC000163

From: WILLIAM (BILL) CALDWELL
To: SARGENT, SHEA P
Date: 9/11/02 1:30PM
Subject: VCM Dosimetry and stuff

You and I talked about maybe making a change in the supplier for our VCM dosimetry analysis. I have 10 samplers left which will be enough to do this month. I will need to order some for October. If you can, let me know by the first of October so I will know what to do.

I did the first round of lead samples at Prairie today (five pumps). I know it will take one more round to have sampled all the job titles out there. How many base line samples per job class will we need to take? I know it will depend on the results. Woodie said he was surprised by the low numbers from the last samples. He thinks it might have something to do with moving the lines and the fact that all the doors are open and there is a lot of fresh air circulating. He said, "those numbers are so good we might be able to stop using the respirators." I KNOW they don't want to do that.

GGC000164

From: WILLIAM (BILL) CALDWELL
To: SARGENT, SHEA P
Date: 9/26/02 9:11AM
Subject: VCM

Did ya'll get 'ny rain?

I have used the last of the VCM badges. I will need to order some pretty soon for the sampling next month.

Tim Corbell lost his yesterday, the velcro pulled loose. The yard guys seem to have the hardest time keeping those things on. I am working on some other more secure way of making sure they don't come off.

We looked at the new model of the HNu a long time ago and there has been some question about why we have not pushed on and purchased those. Are the new ones supposed to be more resistant to the changes in moisture content of the air. We had a leak at a valve stem yesterday and two of the units we had would not read due to the rain. The vinyl guys doing the fire watching were raising Cain about not having a meter that would work.

I hope the ball game in Baton Rouge Saturday doesn't get too embarrassing.

GGC000165

From: Erik E. Smith
To: AUTREY, JIMMY; BROWN, SAMUEL; Markerson, Chris M.
Date: 10/1/02 2:48PM
Subject: Dusting Around Cyclone Dryers

Charlie Holcomb expressed some concerns about his exposure to fine dust that he presumed was coming from the cyclone dryer scrubber temporary outlet. I suggested that if he felt that he was at risk that he wear an air mask. He appeared upset by that suggestion.

GGC000166

From: JIMMY AUTREY
To: doa
Date: 10/4/02 5:39AM
Subject: Mx - 10/3/02

There was 1 CI in Utils:
Rpr 400 lime feeder probe
GGC complete (DWN)

There were 5 Es written yesterday in Vinyl:
Rpr HPSW line leak
Rpr Rx741 ams pot low level
Rpr bd tank leak
Rpr EM n fvcn rcvr level
Unplug Rx741 pt

There were 2 Es in Cmpd/Pz:
Rpl 416 silo chute
Rpl R1 large rd

**Summer ends, and Autumn comes, and he who would have it otherwise would have high tide
always and a full moon every night.**

Hal Borland

GGC000167

From: JIMMY AUTREY
To: BEALL, JOE
Date: 10/5/02 11:18AM
Subject: Fwd: dust problem solution

On Friday afternoon, Oct. 4, 2002, Chris Markerson and I held a discussion with Charlie Holcomb. I expressed concern over statements made by Charlie during that day's Friday AM safety meeting in which he was questioning the decision to remove the stack on #11 dryer. In particular, my concern lay in his statement that the company was trying to hide something.

When I expressed my concern to him, he did not answer directly but started talking about how on the first day of his employment at this plant a supervisor took him down to the tankfarm and opened a valve on a VC line. He said that VC covered the area. He was then told to walk around in it and "see what it was like, and that it wouldn't kill you." He says he was also told that it would only make you high and if you got too much you would pass out.

We said that we couldn't speak to that but we could address his concern about dusting. On numerous occasions, he has brought up his concern over dusting with other employees and supervision. Earlier in the week he confronted Erik Smith on his concern about the "fine" dust being released by the temporary system on #11 dryer.

He was shown data detailing how area and personnel monitoring showed that exposures were below regulated limits. He asked if any data had been gathered since the temporary system had been put in place. Chris responded that it had not, but we would perform some testing in the upcoming week.

He asked some questions about what the data meant and what the limits were, and did not try and refute anything it showed. He kept the copy that Chris provided him with and the meeting adjourned.

On Saturday, as Chris was going through the Safety Ticket box he found one that Charlie had turned in sometime on Friday where he said that "I attended safety meeting this morning and expressed by concerns about why the company is trying to kill us."

Please let me know if you would like to discuss further.

CC: Markerson, Chris M.

GGC000168

From: WILLIAM (BILL) CALDWELL
To: SARGENT, SHEA P
Date: 10/7/02 6:42AM
Subject: Talk

I got to talk to you.

When you have a chance I need to discuss the dust sampling at the Cyclone - it is pretty bad. And, I need to know about the VCM badge sampling. Joseph Smith left me a voice mail last week to call him - I'm not sure what that is about but I will call him today.

We'll be leaving at lunch to play in the YMCA benefit scramble - tough day at the old salt mine.

GGC000169

From: NEEDHAM V. STAHL
To: Vinyl Op. / Maint.; Vinyl Shift Supervisors
Date: 10/7/02 2:56PM
Subject: Safety

One last time. Make sure that all Vinyl Employees wear their PPEs when we are suppose too and wear them correctly. We take for granted some of our protection equipment and avoid wearing them correctly, such as side shields on your glasses, nomex with the selves rolled up, steel toed boots, etc. To remind every one, the Line Opening Procedure says the an supplied air respirator must be worn when opening a line/vessel that has contined VCM. This will include filter packs, strainers, pumps, etc.

I expect each of us to stick by the rules that have been laid before us and if discipline is involved just inform me. Each of us can issue an oral warning when ever we feel it is needed, make sure Union Representation is offered. I'll track all of these and keep all the Vinyl Supervision and HR posted.

GGC000170

From: BRANDON NADLER
To: MEYERS, RONALD
Date: 10/7/02 11:35AM
Subject: Respiratory Protection

Ronnie,
I was just reading CFR 1910.134 in my spare time and I noticed the following (cut and pasted directly from the OSHA Web site - no editing):

1910.134(h)(3)(i)(C)
Emergency escape-only respirators shall be inspected before being carried into the workplace for use.

1910.134(h)(3)(ii)
The employer shall ensure that respirator inspections include the following:

1910.134(h)(3)(ii)(A)
A check of respirator function, tightness of connections, and the condition of the various parts including, but not limited to, the facepiece, head straps, valves, connecting tube, and cartridges, canisters or filters; and

1910.134(h)(3)(ii)(B)
A check of elastomeric parts for pliability and signs of deterioration.

If someone wanted to take a very liberal interpretation, they could argue that every person that enters the gate needs to take their respirator out and inspect it each time they report to work. Of course what about the respirators that are in a sealed pouch to preserve the condition of the respirator?
Brandon

GGC000171

From: JOE BEALL
To: AUTREY, JIMMY
Date: 10/8/02 7:16AM
Subject: Re: Fwd: dust problem solution

Jimmy, lets' talk about putting this in writing to Charlie.

>>> JIMMY AUTREY 10/05/02 12:18PM >>>

On Friday afternoon, Oct. 4, 2002, Chris Markerson and I held a discussion with Charlie Holcomb. I expressed concern over statements made by Charlie during that day's Friday AM safety meeting in which he was questioning the decision to remove the stack on #11 dryer. In particular, my concern lay in his statement that the company was trying to hide something.

When I expressed my concern to him, he did not answer directly but started talking about how on the first day of his employment at this plant a supervisor took him down to the tankfarm and opened a valve on a VC line. He said that VC covered the area. He was then told to walk around in it and "see what it was like, and that it wouldn't kill you." He says he was also told that it would only make you high and if you got too much you would pass out.

We said that we couldn't speak to that but we could address his concern about dusting. On numerous occasions, he has brought up his concern over dusting with other employees and supervision. Earlier in the week he confronted Erik Smith on his concern about the "fine" dust being released by the temporary system on #11 dryer.

He was shown data detailing how area and personnel monitoring showed that exposures were below regulated limits. He asked if any data had been gathered since the temporary system had been put in place. Chris responded that it had not, but we would perform some testing in the upcoming week.

He asked some questions about what the data meant and what the limits were, and did not try and refute anything it showed. He kept the copy that Chris provided him with and the meeting adjourned.

On Saturday, as Chris was going through the Safety Ticket box he found one that Charlie had turned in sometime on Friday where he said that "I attended safety meeting this morning and expressed by concerns about why the company is trying to kill us."

Please let me know if you would like to discuss further.

CC: Markerson, Chris M.; NADLER, BRANDON

GGC000172

From: WILLIAM (BILL) CALDWELL
To: SARGENT, SHEA P
Date: 10/8/02 1:42PM
Subject: Dust

I have two cyclones. I have no PVC filters. I will put in the REQ and can have them ordered as soon as Chris comes back to Aberdeen.

I need to back up and say that I may be something of an alarmist. Visually the "dust" coming from the #11 cyclone dryer I am sure contains a great deal of moisture. It is still pretty bad but it dawned on me this afternoon that a lot of what you can see is condensate, especially since the weather is a little cooler. The numbers will tell the tale.

GGC000173

From: JIMMY AUTREY
To: CALDWELL, WILLIAM (BILL)
Date: 10/9/02 9:23AM
Subject: Re: Dust Masks

Please look to see what may be available. Thanks.

>>> WILLIAM (BILL) CALDWELL 10/09/02 10:19AM >>>

Yes, I have the list of sizes and can issue that. In the past Shea gave everybody a card with that information on it. I would like to just post a list there in the free bin area so they can check it when they go shopping for a respirator. As far as the bags, the compound guys that wanted to keep up with the one they had generally kept it in the plastic draw string bag it came in. If you want something more substantial than that I can see what I can find.

>>> JIMMY AUTREY 10/09/02 10:10AM >>>

Does everyone know what size they wear (maybe I'm just stupid but I don't know what size I'm supposed to wear. Remember, we had trouble getting one to fit my old pie face)? Can we reissue the list of who wears what size? Also, what about bags to carry them around in?

>>> WILLIAM (BILL) CALDWELL 10/09/02 09:21AM >>>

Unless we missed someone every operation and maintenance employee was fit tested for the 3M half face respirator during July. Those respirators are supplied in the free bin area and are a Vallen consignment item.

There should not be any reason for any employee not being able to issue himself a respirator at any time unless the stock runs out. If that happens it would be an issue to take up with Vallen.

We will also be redoing the fit test during the annual physicals with the intention of making that a part of the physical process each year.

>>> NEEDHAM V. STAHL 10/09/02 07:40AM >>>

Only the 3M 6000 series mask are approved for use in Vinyl. They have a better sealing surface and come in several sizes. This type of mask can be fit tested so each individual can receive the correct size to wear, plus we will have data on each person's sealing ability. If I'm not mistaken, the half face fit test will be conducted during the physicals the week of October 28.

>>> JIMMY AUTREY 10/08/02 02:12PM >>>

Doug, I didn't take an accurate count but there are a significant number of masks (both disposable and other) in the self-service area. Certainly enough for the maintenance department. What I would suggest is for me to buy everyone a disposable mask, give it to them and tell them after it is used to throw it away and get another one out of the storeroom. That way, all have been supplied with respiratory protective equipment should they decide it is necessary. Your thoughts?

>>> Doug Knittig 10/07/02 03:25PM >>>

Do we have enough in the storeroom to provide one for each employee? I think at a minimum we need to make sure they are available immediately to employee's with issues. I think Needham has some.

From: WILLIAM (BILL) CALDWELL
To: Knittig, Doug
Date: 10/9/02 9:21AM
Subject: Re: Dust Masks

What I proposed to Jimmy was to post the size list for all employees in the free bin area next to the respirators.

>>> Doug Knittig 10/09/02 10:14AM >>>

We have not received our cards yet for 2002. I have a 2001 card but it does not have the half face size listed.

>>> JIMMY AUTREY 10/09/02 10:10AM >>>

Does everyone know what size they wear (maybe I'm just stupid but I don't know what size I'm supposed to wear. Remember, we had trouble getting one to fit my old pie face)? Can we reissue the list of who wears what size? Also, what about bags to carry them around in?

>>> WILLIAM (BILL) CALDWELL 10/09/02 09:21AM >>>

Unless we missed someone every operation and maintenance employee was fit tested for the 3M half face respirator during July. Those respirators are supplied in the free bin area and are a Vallen consignment item.

There should not be any reason for any employee not being able to issue himself a respirator at any time unless the stock runs out. If that happens it would be an issue to take up with Vallen.

We will also be redoing the fit test during the annual physicals with the intention of making that a part of the physical process each year.

>>> NEEDHAM V. STAHL 10/09/02 07:40AM >>>

Only the 3M 6000 series mask are approved for use in Vinyl. They have a better sealing surface and come in several sizes. This type of mask can be fit tested so each individual can receive the correct size to wear, plus we will have data on each person's sealing ability. If I'm not mistaken, the half face fit test will be conducted during the physicals the week of October 28.

>>> JIMMY AUTREY 10/08/02 02:12PM >>>

Doug, I didn't take an accurate count but there are a significant number of masks (both disposable and other) in the self-service area. Certainly enough for the maintenance department. What I would suggest is for me to buy everyone a disposable mask, give it to them and tell them after it is used to throw it away and get another one out of the storeroom. That way, all have been supplied with respiratory protective equipment should they decide it is necessary. Your thoughts?

>>> Doug Knittig 10/07/02 03:25PM >>>

Do we have enough in the storeroom to provide one for each employee? I think at a minimum we need to make sure they are available immediately to employee's with issues. I think Needham has some.

GGC000175

From: WILLIAM (BILL) CALDWELL
To: SARGENT, SHEA P
Date: 10/9/02 2:35PM
Subject: BOX

Here are some pics showing the box on #11 dryer. Thoght it maight help to explain what I was talking about. Per Doug K the box is coming down by the end of the month and the stack will be put back up. I think they intend to use the box during the summer moths to cut down on the dusting in the parking lot. The issue in the winter, as you can see, will be the potential for a lot of condensate freezing on the structure due to the north wind.

GGC000176

From: JIMMY AUTREY
To: CALDWELL, WILLIAM (BILL)
Date: 10/10/02 9:18AM
Subject: Re: Old Old CR Water

Thanks. How long does it usually take to get results from a water sample?

>>> WILLIAM (BILL) CALDWELL 10/10/02 10:17AM >>>

Ken Griffie with the health department will be here in 20 minutes to sample the water.
I have ordered the filters to do the dust monitoring and plan to get that done prior to putting the stack back up.

>>> JIMMY AUTREY 10/10/02 09:54AM >>>

He supposedly was going to ask you to do it. Did he not?

Also, what about the sampling around #11 dryer? We need to do this before we put the stack back up toward the end of this month.

>>> WILLIAM (BILL) CALDWELL 10/10/02 09:07AM >>>

If we did I am not aware of it.

>>> JIMMY AUTREY 10/10/02 08:43AM >>>

Did we ever sample the water from the drinking fountain?

GGC000177

Georgia Gulf

Corporation & Affiliates

To: Aberdeen Plant Employees

From: Chris M. Markerson
Date: October 21, 2002

Subject: Medical Screening – Questions & Answers

Earlier this month, all employees were informed of the upcoming medical screening to be performed on site during the week of October 28, 2002, in the “Express” trailer located just northeast of the water tower. As this testing period is approaching, I want to take this opportunity to answer a few questions regarding this screening.

Q: Can I change my scheduled appointment time?

A: All employees should try to make the appointment as scheduled, however, if you have a conflict with the scheduled time, please contact Chris Markerson or Bill Caldwell to assist you in making any necessary change.

Q: Do I have to fast before my screening.....how long do I have to fast?

A: Fasting prior to your medical screening is recommended, especially if you have a history of cholesterol concerns or concerns with your blood sugar. In these cases, the fasting period helps the medical personnel get a more accurate measure. Fasting overnight is the recommended time period. To help ease the (hunger) pain associated with the fasting period, the testing personnel will allow 1 hr. at the start of each testing day (12:30 – 1:30p M/T; 7:00 – 8:00a W/Th/F) to collect blood from employees with “late” appointments.

Q: Is participation in the medical screening mandatory?

A: Yes, all employees are expected to participate in this medical screening. This year’s screening is intended to combine the best aspects of past medical screening, a medical clinic environment with the convenience of being on site.

Q: Are all parts of the medical screening mandatory?

A: Yes, all parts of the medical screening are required, as scheduled for each particular job classification. Different employees are scheduled for different tests based on their job, and the various regulatory screening requirements for these different job classifications. Every employee will receive a “wellness” exam, and then

additional tests as determined by job and regulatory classification.

Q: What are the tests I can expect for my job classification?

A: The exam content for each individual is based on the regulatory classification of the persons job. For example, a vinyl A operator is included in the following classifications: VCM, Respirator, Hazwoper, and Noise. The testing for this job will include the following:

Wellness elements: History Questionnaire, blood-work for cholesterol screening and PSA (men), hands-on exam, vision screening, and audiogram (hearing).

VCM elements: VCM questionnaire, hands-on exam, blood work to include total bilirubin, alkaline phosphatase, SGOT, SGPT, and GGTP.

Respirator: Respiratory questionnaire, Spirometry (every 4 yrs).

Hazwoper: History questionnaire, Respiratory questionnaire, hands on exam, urinalysis, blood count, and liver function tests, and pulmonary function and resting EKG (every 4 yrs.)

Noise: Hearing questionnaire, Audiogram.

As you can see, it can get a little complicated. If you want to know the specific components / test for your job, please contact Chris Markerson.

Q: Will I get a chest X-ray with my testing?

A: Not every employee will receive a chest X-ray. Chest X-rays are required every 5 yrs. for those employees in the Asbestos classification. Other employees may be directed to obtain a chest X-ray, based on the results of the initial screening. Where chest X-rays are indicated as necessary, the Aberdeen Monroe County Hospital will be used for these services.

Q: What should I do to prepare for the medical screening?

A: The medical team who will be here on site is prepared to provide all of the required testing. To prepare, you should fast overnight or at least 8 hrs. prior to the screening. Also, do your best to avoid loud noise for 14 hrs. prior to the screening; this can be achieved by avoidance or by use of ear plugs.

During the medical screening process if you should have additional questions, please contact your supervisor, department manager, or the safety department to assist you in obtaining the information you need. This medical screening is being performed to assist the Aberdeen Plant in meeting its regulatory obligations, and to assist in improving the health and wellness of all Aberdeen Plant employees. This medical screening, however, is not intended to replace a complete physical as performed by an employee's personal physician. In addition to the medical screening as performed on site, Georgia Gulf encourages each employee to build upon this screening and obtain a complete physical exam from his / her personal physician.

Chris M. Markerson

From: Michael L. Carter
To: BAGWELL, AMY; Carter, Beverly S.; Michael L. Carter
Date: 10/23/02
Time: 1:00PM - 1:15PM
Subject: Lab safety recognition
Place: MLC office

I would like to do something in recognition for the Lab concerning Safety. October 1, 2002 we passed 20 years without a OSHA recordable. I would like to discuss ideas.

Michael

CC: Markerson, Chris M.

GGC000181

From: Erik E. Smith
To: ABERDEEN GROUP
Date: 10/23/02 3:49PM
Subject: Employee Participation in the Utilities Area Hazop Study

To comply with OSHA regulations the Utility Area HAZOP (Hazard and Operability Study) will be revalidated. HAZOP is a method of evaluating a process to determine potential hazards. The Utility Area includes the Propane Tank Farm, the Instrument Air compressors and dryer, the Vinyl Emergency Generators, the Chlorine gas feed systems, and the Vinyl Cooling Towers. Employee participation in the Revalidation of the HAZOP is required.

The following employees are currently selected to be part of the Utility Area HAZOP team:

Jimmy Brewer
David Nolen
Ed Mize
Nathaniel Wilson
Jeff Seaver
Erik Smith

All Aberdeen Plant employees are requested to inform the team members of potential safety or environmental issues related to the Utility area that they may be aware of.

Meetings are schedule to be held in the plant's Training Conference Room. Meeting times are 7:00 - 3:30 daily begining Monday October 28, 2002.

GGC000182

From: JIMMY AUTREY
To: daily report
Date: 10/24/02 6:57AM
Subject: Mx - 10/23/02

There were 5 Es written yesterday in Vinyl:

- Rpr FBD CaSt line leak
- Rpr Rx500 main chg vlv air line leak
- Unplug Rx744 pt
- Unplug T1S column antifoam vlv
- Rpr D comp ring seal water flow

There was 1 E written in Cmpd:

- Tighten L2 gran gb baseplate bolts

There were 2 Es in the Yard:

- Rpl 685 silo chute
- Rpl 417 silo chute

**What's gone and what's past help
should be past grief.**

Shakespeare, "The Winter's Tale"

GGC000183

From: JIMMY AUTREY
To: daily report
Date: 10/28/02 7:17AM
Subject: Mx - 10/27/02

There were 3 CI in Vinyl:

Rpr bd tank xfr line leak

GGC complete (JWL)

Rpr gen monitor 317A

GGC on-going (CBP)

Tighten Rx400 open dump vlv pkg

GGC complete (JWL,LRH)

Football combines the two worst features of American life. It is violence punctuated by committee meetings.

George F. Will

GGC000184

From: WILLIAM (BILL) CALDWELL
To: SARGENT, SHEA P
Date: 11/11/02 8:17AM
Subject: Samples

I got the results back from the dust sample monitoring. There was only one that had a detection. That was the total dust sample taken on the ground floor of the dryer, within ten feet of the dumpster they keep there to catch some of the Ca st and fines. It came back 1.108 micrograms/cubic meter. All the other samples were below the detection limit of 0.10 micrograms. If you get a chance I would like to talk about the results.

We also had a couple of over exposures in the yard during the last round of VCM samples. Chris Ewing was a 3.09 and Willie Malone was a 1.82.

GGC000185

From: BRANDON NADLER
To: DEMAND, JIM
Date: 11/18/02 8:23AM
Subject: Re: Tree & Land Purchase

There are too many conflicting interest with lawyers trying to protect them. Knowing that the basis for purchase was the need to conduct an environmental assessment, the land owners asked for indemnification from any environmental issues. Sasol requested to conduct and environmental assessment to ensure that there are no non-PVC plant related environmental issues. The land owners will not agree to allowing an environmental study. Their logic is that the land has never been developed and there are no known environmental issues. If an environmental study is conducted and unveils some issue which prevents the purchase from going through, then they (the landowners) could be left with some environmental liability that otherwise could have remained as is. Meanwhile, Wendy's has apparently been in discussions with the landowners. Wendy's has apparently discussed purchasing the entire property, but asked for indemnification from any environmental issues. Sasol/RWE appears to not be willing to grant indemnification to a 3rd party. My belief is that each party will continue to insist on protecting themselves and nothing will happen, unless someone (Sasol/RWE or GGC) begins to believe that not owning the property carries greater risk than owning the property without indemnification from the other party.

>>> JIM DEMAND 11/18/02 08:01AM >>>

What is the latest and greatest on our purchase effort?
Jim

GGC000186

From: Larry D. Honeycutt
To: Wood, Kelly D.
Date: 11/19/02 3:53PM
Subject: FRESH AIR FOR VCM TANKFARM

WE ARE NOT GETTING ADEQUATE AIR FOR FRESH AIR MASKS AT VCM TANKFARM. CAN YOU GET CHECKED OUT SO CAN INCREASE PRESSURE TO MASK. SEEMS TO DECREASE AS WE USE IT. PLEASE ADVISE.

GGC000187

From: Kelly D. Wood
To: Honeycutt, Larry D.
Date: 11/19/02 4:46PM
Subject: Re: FRESH AIR FOR VCM TANKFARM

OK

>>> Larry D. Honeycutt 11/19/02 03:53PM >>>

WE ARE NOT GETTING ADEQUATE AIR FOR FRESH AIR MASKS AT VCM TANKFARM. CAN YOU GET CHECKED OUT SO CAN INCREASE PRESSURE TO MASK. SEEMS TO DECREASE AS WE USE IT. PLEASE ADVISE.

GGC000188

From: Kelly D. Wood
To: Honeycutt, Larry D.
Date: 11/20/02 4:30PM
Subject: Re: FRESH AIR FOR VCM TANKFARM

The compressor appears to be working OK. Most if not all the in-line filters are bypassed so that shouldn't be the low pressure problem. The pressure regulator at the south end of the old compressor shed may be the problem. I could not adjust the pressure with the regulator. I wrote a WO to repair the regulator and install some pressure gages upstream and downstream to help troubleshoot. The WO is a U. Let's see if that helps.

>>> Larry D. Honeycutt 11/19/02 03:53PM >>>

WE ARE NOT GETTING ADEQUATE AIR FOR FRESH AIR MASKS AT VCM TANKFARM. CAN YOU GET CHECKED OUT SO CAN INCREASE PRESSURE TO MASK. SEEMS TO DECREASE AS WE USE IT. PLEASE ADVISE.

GGC000189

From: JIMMY AUTREY
To: daily report
Date: 12/5/02 6:52AM
Subject: Mx - 12/4/02

There were 5 Es written in Vinyl yesterday:

Rpr DAP flowmeters
Rpr 282 xfr vlv packing leak
Rpl #8 Bird sparge pipe
Rpr FBD centrate pump leak
Unplug Rx746

There were 3 Es in Cmpd:

Rpr L1 mb rcvr hose
Rpr L2 xfr vac readout
Rpr L1 xfr line bracket

**In some cases non-violence requires more militancy than violence.
Cesar Chavez**

GGC000190

From: JIMMY AUTREY
To: daily report
Date: 12/9/02 8:41AM
Subject: Mx - 12/8/02

There were 4 CI in Vinyl:
Rpr vlv between FBD backmix and plugflow (2)
GGC complete (DWN)
Rpr Rx700 isonox vlv open lite
GGC complete (DWN)
Rpr 282 silo xfr line cplg leak
GGC complete (GKP,ARP)

There was 1 CI in the Yard:
Rpl 691 silo chute
GGC complete (GKP,ARP)

Few men have virtue to withstand the highest bidder.
George Washington

GGC000191

From: WILLIAM (BILL) CALDWELL
To: BARNES, MICHEAL; BATY, RICHARD; BLAKE, CHARLES N; BLAYLOCK, JOHN;
CARRUTH, JAMES; COON, BRIAN; English, William C.; Ewing, Chris D.; Gathings Jr., Dave;
GILREATH, CHRIS D.; HOLLIS, RICKY; Markerson, Chris M.; MCGEE, BERNARD; ROBINSON,
WILLIAM; ROWELL, BILLY R; SANDERS, JEFFREY L; Sargent, Michael C.; STAHL, NEEDHAM V.
Date: 12/10/02 12:05PM
Subject: Confined Space Article

The following is an article I copied off the Industrial Fire World web site - fireworld.com.

Confined Space Rescuers Too Often Become Victims

By Robert Aguilaz
Roco Rescue

Are you prepared for confined space rescue?

Do you have personnel with the skills, equipment and confined space knowledge necessary both to extract the entrant and ensure the safety of the rescuers? Unfortunately, rescuers have often become victims as a result of not being aware of their limitations. Prior to enactment of the permit-required confined space regulations, 60 percent of all fatalities in confined space incidents where multiple fatalities occurred were would-be rescuers.

Emergency response to confined space incidents cannot be approached exactly like emergency response to other incidents, such as a fire. For example, if an industrial fire brigade responds to a fire and the fire grows beyond their capabilities, the team has the option to back out and let it burn — suffering a loss of equipment rather than risking their lives. However, when an entrant goes down in a confined space and the rescue team stands down due to inadequate training, the result is the sacrifice of the entrant's life. Decisions to limit confined space rescue capabilities gamble with both the entrant's life and the lives of the rescuers.

Rescuers and non-rescuers alike should be aware of the limitations of their capabilities in order to avoid becoming victims. A perfect example of this occurred in the Middle East two years ago. Firefighters at a refinery responded to an incident in which an entrant was down in a confined space where hydrogen sulfide was the culprit. The fire officer realized that the firefighters had not received the training necessary to perform confined space rescue safely. In addition to not having adequate confined space rescue training, he knew that the level of the hydrogen sulfide might create an explosive hazard from which the firefighters would be unprotected if they attempted the rescue. The fire officer made a decision not to attempt rescue and to move the firefighters to a safe area. Almost immediately after evacuating the area the vessel exploded, destroying most of the processing unit. The fire officer's critical evaluation of the team's capabilities and the subsequent "no-go" decision saved the life of the firefighters. Other responders in similar situations have not been so lucky.

RESCUE SKILLS

Evaluating the team's capability in terms of rescue skills is a multi-step process. First, a "paper" evaluation should be performed to determine if the proper skills have been taught to the team. If the paper evaluation indicated that the team has done what is required to be prepared for rescue, a "performance" evaluation should be conducted to determine whether the team is actually capable of performing rescue from the types of spaces and under the circumstances which they will be expected to operate.

An important item often overlooked is that in virtually every case the team should be trained in high-angle rescue techniques as well as confined space rescue techniques. Many confined spaces are located

above ground, or have access portals that are located above grade where the only access is by caged ladder or scaffolding. The rescue team must be able to move the rescued entrant to the ground after extraction from the confined space in order to complete the rescue. Additionally, many of the same techniques used for high-angle rescue, such as lowering systems, are also used for confined space rescue. Unless every space in the facility is configured such that a rescued entrant would not have to be lowered, high-angle rescue training is an indispensable part of the rescue training.

Some of the specific skills that should be evaluated include rescue knots, anchoring and rigging, equipment selection and maintenance, patient packaging, lowering systems, hauling systems, safety belay systems and pre-planning for rescue. Additionally, if there are any spaces that have actual or potential atmospheric hazards, training should include the proper use of respiratory protection. This training must include performing practice rescues while wearing the appropriate respiratory equipment. The person conducting the evaluation must have the knowledge and experience necessary to critically evaluate the capability of the team. Rescue experience is a critical factor in selecting the evaluator. The evaluator must have the experience and broad rescue knowledge necessary to recognize a safe application of the technique being used, or a safe adaptation of a particular technique to cope with the circumstances of the rescue.

Part of the performance evaluation should include a critique, or debriefing, to address deficiencies in the performance of the rescue. In this context, "deficiency" includes identifying how the rescue could have been performed more efficiently, or with less exposure to the rescuers. Even if the rescue is satisfactorily performed, the evaluator must have the requisite knowledge and experience to conduct this critique so that the team can improve its performance. It is difficult to get the most out of a performance evaluation if team members are conducting their own evaluations. Because team members generally have similar levels of training, they may not recognize deficiencies as readily as an experienced outside evaluator.

Some of the areas that should be specifically addressed in the performance evaluation area safety, rescue strategy, efficiency of the rescue plan, proper and effective team operations during the rescue, timeliness of preparation and insertion of the rescuer, appropriate patient care, and the speed of completing the rescue. Again, the evaluator's experience is critical in order to adequately evaluate the rescue and address ways to improve performance.

HAZARD EVALUATION AND ASSESSMENT SKILLS

In evaluating the state of training for confined space rescue capability, it is important not to develop tunnel vision and focus solely on ability to build and operate rescue systems. Technical rescue capability not only includes these skills, but the ability to critically evaluate the hazards of confined spaces and implement the measures necessary to protect against those hazards. In instances where would-be rescuers have been killed, it has been almost exclusively as a result of a hazard of the space, as opposed to the improper operation or failure of a rescue system. Therefore, it is necessary not only to evaluate the team's ability to perform rescue from a confined space, but to evaluate the team's capability to recognize, assess and address actual or potential hazards while performing rescue.

The team must be trained to properly assess the confined spaces and to evaluate the actual or potential hazards in the space. When rescue is required from a confined space, it is obviously because something has gone wrong in the space. Considering that the space was presumably evaluated prior to the initial entry, the rescuers are assessing a space where something was missed on the initial evaluation, or where something has changed in the space that was not anticipated in the initial evaluation.

In either case, it becomes easy to understand why the rescuers must be well trained in confined space hazard assessment in order to safely perform rescue. The rescue team must quickly and accurately reevaluate the confined space in a time pressure situation and continuously reevaluate the situation while performing rescue. They must determine whether a hazard was missed or changed, determine any required changes to personal protective equipment, develop a rescue plan, and safely enter the space and perform rescue ... all in time to save the entrant.

Skills must include hazard identification, methods for properly isolating the space from hazards, control of hazardous energy sources, air monitoring, and proper ventilation of confined spaces. For the safety of the rescue team, training in these areas must go beyond the basics. Consider the following scenario as an example.

Rescuers respond to a confined space where an entrant is down. The space is being mechanically ventilated, and air monitoring shows a good atmosphere. A co-worker states that the entrant was halfway down when he fell from the ladder to the bottom of the vessel. The entrant is unresponsive. The first rescuer enters, but halfway down he also falls from the ladder. What might have happened?

In this particular scenario, it may be that due to the configuration of the vessel and the ventilation equipment, the ventilation is "short circuiting" and not providing a full air exchange in the vessel. This would also account for a good air monitor reading at the entry portal. Further, there may be a hazardous gas in the vessel that is heavier than air and has settled in the bottom half of the tank.

Are your rescuers trained and experienced enough to recognize whether ventilation is adequate given the configuration of the vessel, the location of open portals, and the substance creating the actual or potential atmospheric hazard? Are they properly trained in air monitoring techniques, including the sampling time of the particular atmospheric monitor they are using? Do they have the knowledge to quickly assess whether the vessel has been properly isolated? Training in all of these areas is critical to safe rescue.

In summary, rescue training and evaluation should be approached with the mindset that in addition to rescuing the entrant, the primary purpose is to protect the rescuers who are performing rescue. Paper and performance evaluations are necessary tools to determine whether the rescue team can properly and safely perform a confined space rescue.

Robert Aguiluz is general counsel for Roco Rescue. Contact Roco Rescue at (800)647-7626.

From: JIMMY AUTREY
To: daily report
Date: 12/10/02 6:28AM
Subject: Mx - 12/9/02

There were 2 CI in Vinyl:
Unplug T1S column antifoam cv
GGC complete (DWN)
Unplug T1S feedtank antifoam
GGC complete (DWN)

There was 1 CI in Cmpd:
Rpr L1 die plate heater
GGC on-going (RDR)

There were 6 Es written in Vinyl yesterday:
Unplug Rx744 pt's
Rpr VP900 inlet vlv air line
Rpr 682 silo baghouse pulser
Rpr isonox pump
Rpr 648/649 blend tank line leak
Rpl CP903

There was 1 E in Cmpd:
Rpr L1 color feeder

When the rich wage war, its the poor who die.
Jean-Paul Sartre

GGC000195

From: Kelly D. Wood
To: Wells, James D.
Date: 12/12/02 7:23AM
Subject: Re: The breathing air compressors are both still running. This has been the case ever since you and I b

Have we tried running with one compressor?

>>> James D. Wells 12/11/02 07:55PM >>>

The breathing air compressors are both still running. This has been the case ever since you and I by-passed the flow meter several weeks ago. This is not normal. I feel that there is a substantial leak somewhere but I can not find it. I just thought that you might be interested.

GGC000196

From: JIMMY AUTREY
To: daily report
Date: 12/18/02 6:49AM
Subject: Mx - 12/17/02

There were 3 Es written in Vinyl yesterday:
Rpr T1S dump tank inlet vlv lites
Rpr 702 ERS tank sight glass
Rpr 282 xfr line leak

There was 1 E in Cmpd:
Rpr L2 gran Sterlco unit

There was 1 E in the Yard:
Rpr 687 silo vlv

There was 1 E in Utils:
Rpr #6CT phosphate line heat tracing

A man learns by two things. One is reading. The other is association with smarter people.
Will Rogers

GGC000197

December 20, 2002

OSHA Docket Office
Docket No. S-778-A
U.S. Department of Labor
Room N-2625
200 Constitution Avenue, N.W.
Washington, D.C. 20210

Re: Standards Improvement Project – Phase II, Proposed Rule
(67 Fed. Reg. 66494, October 31, 2002)

To Whom It May Concern:

The Vinyl Institute, Inc. (VI) appreciates the opportunity to comment on the referenced proposal issued by the Occupational Safety and Health Administration (OSHA). The Vinyl Institute, Inc. (VI) is a U.S. trade association representing the leading manufacturers of vinyl, vinyl chloride monomer, vinyl additives and modifiers, and vinyl packaging materials. The Institute has a dual charter to promote and protect the industry and the markets it serves. The VI's mission is to gather and communicate technical information to support the responsible manufacture, use and disposal of vinyl products, to build recognition among a wide range of stakeholders on the benefits and value of vinyl, and to maintain a level playing field with other materials. VI members manufacture the majority of the U.S. production volume of ethylene dichloride (EDC), vinyl chloride monomer (VCM), and polyvinyl chloride (PVC). The VI is a trade association member of the American Plastics Council (APC).

I. GENERAL COMMENTS

Consistent with the goals of the Occupational Safety and Health Act, the VI believes every OSHA standard should reflect the following objectives: 1) providing a

GGC000198

reasonably safe place of employment in the most cost-effective manner; 2) using regulatory language that is well organized and easily understood; and 3) using regulatory language that states employers' obligations in performance-oriented language to the extent feasible. The same objectives apply whether the Agency is developing a new standard or revising an existing standard. Accordingly, the VI strongly supports efforts to make regulations more understandable for employers, employees and OSHA compliance personnel by eliminating unnecessarily complex language, unnecessary cross-referencing, duplication and variations between similar standards.

II. COMMENTS ON SPECIFIC SECTIONS OF THE PROPOSAL

A. Licensed Laboratories

OSHA proposes to delete the outdated reference to laboratories licensed by the U.S. Public Health Service (USPHS) under 42 CFR part 74 from paragraph (k)(6) of the Vinyl Chloride standard and seeks comment on "the need to specify a licensing or quality-control requirement" for laboratories that analyze biological samples collected during medical examinations. [The VI does not believe that there is a current need for specific licensing or quality-control requirements. ??? Why ???]. However, in the event that OSHA decides that there is a need for licensing or quality-control requirements, the VI believes that the requirements specified in 42 CFR 493 would be a suitable substitute for the requirements of former 42 CFR 74.

B. Monthly and Quarterly Exposure Monitoring

The VI supports OSHA's proposal to amend §1910.1017 paragraphs (d)(2)(i) and (d)(2)(ii) that require monitoring of employee exposures at least monthly when employee exposures are in excess of the permissible exposure limit (PEL) and not less than quarterly if employee exposures are above the action level (AL). The VI believes that amending the current standards to reflect the exposure monitoring requirements on the more recently published substance-specific standards, requiring monitoring at least quarterly if employee exposure levels are above the PEL and semi-annually when employee exposure levels are above AL, will significantly reduce employer burdens while not significantly reducing the protection afforded to employees by the existing standards.

C. Semiannual Medical Examinations for Employees Experiencing Long-Term Toxic Exposures

OSHA proposes to revise the current requirement under paragraph (k)(2)(i) of the vinyl chloride standard that requires employers to provide a semiannual medical examination to employees exposed to vinyl chloride or polyvinyl chloride above the AL for at least 10 years. The VI supports both OSHA's reliance on evidence that suggests that semiannual examinations are unnecessary and that annual medical examinations are sufficient to detect cancer and other medical impairments caused by exposure to vinyl chloride and OSHA's proposal to revise paragraph (k)(2)(i) to require that employers provide annual medical examinations for covered employees regardless of the duration of exposure.

D. Notification of OSHA Regarding Regulated Areas

The VI supports OSHA's proposal to eliminate the requirement in paragraph (n)(1) that employers notify the nearest OSHA Area Director/Office if they are required by the vinyl chloride standard to establish regulated areas in their workplaces. If OSHA has not found the notification provision useful in obtaining information on control technology or for inspection purposes the requirement serves no purpose and should be eliminated.

E. Reporting Emergencies to OSHA

The VI agrees with OSHA that the reporting provisions in paragraph (n)(2) of the vinyl chloride standard that requires that emergencies be reported to the OSHA Area Director within 24 hours of the incident should be eliminated.

F. Semiannual Updating of Compliance Plans

OSHA proposes to revise the requirement that compliance plans developed to meet the exposure control objectives of the standard be updated at least semiannually. The VI supports OSHA's proposal to revise paragraph (f)(3) to require compliance plan updates annually. The VI agrees with OSHA that such a revision would reflect current industry practice outside the VCM/PVC Industry and would make this requirement

consistent across OSHA standards without diminishing employee protection and will reduce paperwork.

G. Notifying Employees of Their Exposure Monitoring Results

VI supports OSHA's proposal to revise paragraph §1910.1017 (n)(3) of the vinyl chloride standard to require that employers notify their employees of their exposure monitoring results within 15 days, rather than the 10 currently required, either individually in writing, as currently required, or by posting the employees' results in a readily accessible location, or both. The VI agrees that making the notification and timing requirements consistent across standards will reduce regulatory confusion and facilitate compliance without diminishing employee protection.

* * * *

The Vinyl Institute appreciates the opportunity to comment on the proposed changes to the Vinyl Chloride Standard in §1910.1017.

Respectfully submitted,

Timothy F. Burns

President and CEO

K:\Data\BUS_COML\VI11590\23\OSHA WORKER SAFETY\VIPhaseIIComments.doc

From: JIMMY AUTREY
To: daily report
Date: 1/3/03 6:44AM
Subject: Mx - 1.2.03

There was 1 CI in Vinyl:
#11 ID fan will not start
GGC on-going (DWE)

There were 9 Es written in Vinyl yesterday:
Rpr bd tank xfr line leak
Clean rotary dryer centrate line
Rpr Rx400 steam stripping line closed lite
Clean EM e ring seal water exchanger
Clean EM w ring seal water exchanger
Rpl Rx500 inert vent manual vlv
Torque Rx600 cond lid
Install centrate tank level isolation vlv
Rpr Rx744 slurry temp cycling

There was 1 E in Cmpd:
Rpr L2 granulator water sterlco

Let thy speech be short, comprehending much in few words.
Ecclesiasticus

GGC000202

From: Dave Gathings Jr.
To: Sneed, Rory H.
Date: 1/3/03 9:56AM
Subject: P.a. spill (1/03/03)

Rory,

On Friday morning at shift change Andy Carruth told me he needed a work order put in on the P.A. pump. The seal was leaking. Coleman Haynes was making his morning rounds and notice the pump had started to leak material onto the ground. He contacted Jack Wertz and we went out and valved off the pump and put in a (E) work order to repair the pump immediately. The pump had leaked out approximately 2 to 3 gallons of P.A. material. Some of the material did get to the drain but was crystalize and did not go anywhere. I had Ted Nickerson come out to check to see if we needed to do anything else at this time.

As soon as Maintenance finish repairing the pump, we will finish cleaning up the material from the floor. I am attaching a copy of this e-mail to the initial incident report.

CC: NICKERSON, TED

GGC000203

From: Mark G. Jakel
To: Wiles, Andrew J.
Date: 1/7/03 2:09PM
Subject: Re: Teflon tape on valve plugs

Andy,

I was not aware of the problems you had last summer. We have installed a filter in our system last year to protect the vent collection system from debris from railcar loading and unloading activities. We've had a filter on the feed line to the railcar loading for many years. We've not seen any buildup of tape in the filter recently, but others have indicated there were some problems in the past. We stress the use of adequate teflon tape to be used as a way to minimize leaks. With the scrutiny of VCM leaks and vulnerability of railcars outside the plant, we've taken numerous precautions. We've had very good success in the past couple of years having almost no leaks. I would not want to revert back to not using or minimizing the use of teflon tape. You might want to check with Aberdeen on what they have seen or do to prevent collection of teflon tape. Do you feel that the pluggage is from recent use of tape or buildup of past use? We've done a lot of training this past year on proper taping and installation of plugs to ensure no leaks, and without excessive buildup of tape on the plugs. Our loaders have been trained to remove the old tape before reapplying fresh tape. If you see differently, please let me know.

I hope your holidays were good and your family is doing well.

Mark

>>> Andrew J. Wiles 01/06/03 11:27AM >>>

Mark,

I'm not exactly sure when we changed, but in the past couple of years, we've started seeing Teflon tape used on the plugs in the VCM car valves. I assume we started doing this to reduce leaks. On our end, we've seen a buildup of Teflon tape in our VCM storage system, to the point where we had to unplug the VCM transfer line from the sphere last summer because of flow restrictions. Since then, we haven't had to do it again, but I'd hate to imagine having to clear the sphere because we have a buildup of tape in it. Were you aware of this issue we had last summer? Is there something different you guys could do?

CC: Fruge, Archie P.

GGC000204

From: Chris M. Markerson
To: ABERDEEN GROUP
Date: 1/8/03 7:21AM
Subject: Aberdeen 2003 Annual Training Days

2003 Supplemental Safety Training has been scheduled for January 2003. The training dates are as follows:

January 21st, 22nd, and 23rd.
January 28th, 29th, and 30th.

All Aberdeen GGC employees are required to attend one of these training days.

Office and clerical personnel will attend only the first half of the day.

Lab employees will attend until the 1:00 break.

Operations and Maintenance employees will attend the full day's session.

Please let me know if you have any questions.

CMM

GGC000205

CITIZEN'S COMPLAINT/REQUEST REPORT

NAME Linda Love DATE: 1/9/03

ADDRESS: 804 South Mattubby TIME 11:45 am

Aberdeen, MS 39730 PHONE NO. 369-8160

COMPLAINT/REQUEST White powder, looks like ash, on her car. Nothing new but has been worse lately. She contacted city and they told her to call us.

REPORT TAKEN BY Kenny Akins

TEMPERATURE 61°F WIND SPEED 10 G 15 WIND DIRECTION SW

WEATHER(cloudy, clear, rain, etc.) Overcast

PROCEDURE

1. Take down the complaint on this form in as much detail as possible and tell them that someone from the plant will contact them shortly.
2. Notify the following people immediately:

WEEKDAY DAYS:

Environmental Manager – 3637
Safety and Health Manager - 3618

WEEKENDS, NIGHTS, OR HOLIDAYS:

Vinyl Shift Supervisor – 2211 **OR**
Compound Shift Supervisor – 2240

AND ONE OF THE FOLLOWING:

	<u>Phone</u>	<u>Pager</u>
1)Environmental Manager Kenny Akins	327-3851	305-6124
2)Safety and Health Manager Chris Markerson	840-7395	305-6119
3)Compound Unit Manager Rory Sneed	329-2368	305-6114
4)Vinyl Unit Manager Doug Knittig	327-4356	305-6116
5)Plant Manager Brandon Nadler	840-0516	305-6120

3. Distribution:
 - Original to Environmental Manager
 - Copies to Plant Manager and Department Managers

GGC000206

From: KENNETH AKINS
To: AUTREY, JIMMY; BEALL, JOE; Carter, Michael L.; KNITTIG, Amy E.; Knittig, Doug; Markerson, Chris M.; NADLER, BRANDON; Sneed, Rory H.
Date: 1/10/03 3:10PM
Subject: Citizen Complaint

This is the first complaint we've had in a few years...let's all stay vigilant and keep a close eye on dryers, silos, xfer lines, spills or anything else that might contribute to off-site dusting.

Kenny

GGC000208

From: JIMMY AUTREY
To: daily report
Date: 1/10/03 6:37AM
Subject: Mx - 1/9/03

There were 3 CI in Vinyl:

Unplug Rx741 pt

GGC complete (MCS)

Unplug 647bt pump

GGC complete (FBF, MDBi)

Unplug 646bt pump

GGC complete (FBF, MDBi)

There were 6 Es written in Vinyl yesterday:

Rpr gen monitor M19-B

Hydro Rx745 shell & cond

Rpr 282 xfr line leak

Rpr #4 dryer feed cv

Rpr #10 dryer feed cv

Lite #10 dryer

Freedom is what you do with what's been done to you.
Jean-Paul Sartre

GGC000209

From: JIMMY AUTREY
To: daily report
Date: 1/13/03 6:50AM
Subject: Mx - 1/12/03

There were 6 CI in Vinyl:
Head up Rx745
TWS complete
Hook-up lites on Rx745
GGC complete (DWN)
Rpr Rx742 normal kill vlv open lile
GGC complete (MCS)
Rpr n bd tank pump cplg
GGC complete (CNB,BRR)
Rpr bd tank xfr line leak
GGC complete (CNB,BRR)
Rpr 281 silo star vlv gb
GGC complete (JWL,BRR)

There were 2 CI in Cmpd:
Rpr L1 die plate htr
Irvin complete
Rpr L1 TiO2 limit switch
GGC complete (MCS)

An expert is a man who has made all the mistakes, which can be made, in a very narrow field.
Niels Bohr

GGC000210

From: BRANDON NADLER
To: DEMAND, JIM
Date: 1/13/03 7:47AM
Subject: Fwd: Citizen Complaint

FYI -
Follow up on the complaint we had last week.
Brandon

GGC000211

COMPLAINT 0301 FOLLOW-UP

DEK and I visited Ms. Love's residence (southeast corner of Matubby and Hwy 25) at approximately 1:00 pm on Thursday, January 9th. Ms. Love described a white substance on her car that she had seen before but had been worse lately. She contacted the city (mayor?) and was told to call us. She indicated that she thought it might be ash, coming with the "smoke" that was especially visible at night. We explained that the "smoke" was steam from the dryers and that the residue on her car was plastic. DEK lifted resin samples from the car with scotch tape. She also indicated that her first cousin across the road also found the white substance on his truck. We told her we would check for specific problems at the plant and call her back the next day.

I called Ms. Love at approximately 1:56 pm on Friday, January 10th. I explained to her that we did have a transfer line to the 400 series silo leak on Wednesday night. With the wind out of the west and southwest during this time period, this might have contributed to the plastic she saw. I apologized for any inconvenience we might have caused her and told her that we had given her tag number to the guard and that she was welcome to use our car wash to rinse the resin from her car if it happened again. She thanked me for calling and we hung up.

From: JIMMY AUTREY
To: daily report
Date: 1/16/03 7:45AM
Subject: Mx - 1/15/03

There were 3 Es written in Vinyl yesterday:
Rpr bd tank's pump line leak
Rpr Rx500 cat pot wtr line leak
Unplug Rx700 cat pot recirc line

There were 2 Es in Cmpd/Pz:
Rpr L1 wtr sterlco
Rpl R2 rd

There were 2 Es in the Yard:
Rpl #5 s liq line vlv
Rpr rail scale

Between saying and doing many a pair of shoes is worn out.
Italian proverb

GGC000213

From: Daniel A. Miller
To: Markerson, Chris M.
Date: 1/20/03 2:00PM
Subject: RX-744 Incident 01/20/03

Chris,

I talked to Robert Williams when he and JW Lowe returned to the shop after the alarm sounded. JDH told me Robert and JW were working on RX-744. Robert told me they were trying to fix a leak on the check valve in the lip seal flush line. They discovered that the line was plugged and they were trying to unplug it. I understood Robert to say they found it plugged back towards the supply from the check valve, (I am not sure exactly where to on the supply side) He also said it was plugged back to the reactor. Robert said he asked Mark Bailey if it was ok to take off the block valve up against the seal housing. Robert said he understood from Mark that it was ok, because the reactor was depressured. Robert removed the valve and began to unplug the port on the seal housing. He said he dug out some resin and chunks and a little water began to run out which carried another big chunk into the port and when he dug that one out a lot more water came out and then the VCM. He said he tried to put the valve back on but the pressure was too high to get it started and they got away from the leak and then evacuated when the alarm sounded.

Dan Miller: <><

CC: AUTREY, JIMMY

GGC000214

From: JIMMY AUTREY
To: daily report
Date: 1/21/03 6:34AM
Subject: Mx - 1/20/03

There were 4 Es written in Vinyl yesterday:
Reset EM deluge
Rpr Rx744 lip seal check vlv leak
Rpr VC sphere pump up pump vlv wheel
Rpr 282 silo xfr line leak

There was 1 E in Pz:
Rpr T797 steam line leak

There was 1 E in the Yard:
Rpl #3 vc comp

If you aren't rich, you should always look useful.
Louis-Ferdinand Celine

GGC000215

From: Reed Mackay
To: AKINS, KENNETH; AUTREY, JIMMY; BAGWELL, AMY; CARRICO, PAUL; Carter, Michael L.; CHIANG, SCHUMANN; Covington Jr., Roland David; COX, MICHELLE; DEMAND, JIM; DRONE, BEN; FREEBURGH, CHARLIE; Hegwood, Joseph B.; HOLLOWAY, RITA O.; Honeycutt, Larry D.; Jakel, Mark G.; JOINER, MIKE; King, Billy G.; KNITTIG, Amy E.; Knittig, Doug; LANDRY, CHAD; LANGFORD, MICHAEL G.; Lindsey, Horace R.; Markerson, Chris M.; MASSEY, ROGER; Minga, Regina D.; NADLER, BRANDON; PERRY, DARNELL; PLUNKETT, DAVID E.; SEAL, MARK; Seaver, Jeffery A.; SHIELDS, JEFFERY C.; Sneed, Rory H.; SOILEAU, SANDRA; STAHL, NEEDHAM V.; STRICKLAND, RODNEY B.; THERIOT, AMALIA; Wiles, Andrew J.; WILLIS, PATTI; WILSON, ANDY C.; Wood, Kelly D.; Zosel, William R.
Date: 1/21/03 7:48AM
Subject: Aberdeen Resin Plant Update through 1/20/02

Safety and Environmental

There was a reportable VCM release yesterday. A leak at RX-744 reactor coming from the agitator flush during routine maintenance. We reported 56 pounds VCM released. An investigation is in progress.

Production

We made , and 2.50 MM pounds (49 batches).

January Production Prime Plan Forecast: 82.0 MM pounds

January Plant Shipment Plan Forecast: 97.0 MM pounds

January MTD Production: 47.5 MM pounds

Product Inventory: 14.0 MM pounds

January Aberdeen Compound MTD: 5.2 MM pounds

Missed Shipments: 6 - 5305
1 - 5265 started making yesterday
1 - 5385
7 - 5385 M (moisture holds)

Maintenance

RX-744 PM.

Product Mix

Train 1 -5395. We switched from 5385 last night.

Train 2 - 5385M.

Train 3 - 5265. We switched from 5305 yesterday.

GGC000216

From: JIMMY AUTREY
To: daily report
Date: 1/22/03 7:07AM
Subject: Mx - 1/21/03

There were 2 CI in Vinyl:
Rpl Rx746 pt
GGC complete (DWN)
Rpr Rx745 main chg vlv transition piece
TWS complete

There were 6 Es written in Vinyl yesterday:
Unplug Rx744 pt
Rpr 282 xfr line leak
Cal 282 star vlv loop pressure
Tighten 282 star vlv pkg
Align dryer monitor screen
Tune Rx700 cw

There were 2 Es in Cmpd:
Rpr L1 kneader rotary union flex line leak
Rpr L1 water sterlcos

There was 1 E in the Yard:
Install new silo chute design on 691

Education never helped morals. The most savage people we have are the most moral. The smarter the guy the bigger the rascal.

Will Rogers

GGC000217

From: JIMMY AUTREY
To: daily report
Date: 1/23/03 8:19AM
Subject: Mx - 1/22/03

There was 1 CI in Vinyl:
Wrap s ko tank pump disch piping
GGC complete (ECM)

There were 20 Es written yesterday in Vinyl:
Rpr Rx745 main charge vlv lites
Rpr #6 dryer bull gear
Cal WM s rvcn rcvr level
Cal WM n rvcn rcvr level
Rpr Rx500 main chg vlv bottom gskt leak
Rpl #7 Bird belts and sparge pipe
Unplug Rx744 cw nozzle
Rpr Rx743 rinse to shell vlv open lite
Rpr Rx744 vc vlv lites
Rpr Rx742 stm stripping vlv
Rpr Rx745 rinse supply vlv
Rpr Rx744 charge water vlv
Rpr EM dump tank rec cv xmtr
Rpr #5 GC
Chk Rx741 low amp alarm
Rpr 282 xfr line
Unplug 407 bt xfr pump
Rpr #8 dryer baghouse pulser

There was 1 E in Pz:
Rpr R3 press/vac recorder

**If the young only knew; if the old only could.
French saying**

GGC000218

From: JIMMY AUTREY
To: daily report
Date: 1/24/03 6:45AM
Subject: Mx - 1/23/03

There were 12 Es written in Vinyl yesterday:

Rpr Rx600 main chg vlv gskt leak
Unplug FBD slurry pump seal wtr
Rpl FBD slurry pump cplg
Rpr 281 rotary vlv
Rpr 282 rotary vlv
Rpl Rx745 cat pot recirc vlv
Rpr Rx5/600 dump pump seal guard
Rpr EM LM closed dump camera
Rpr process wtr flow heat tracing
Rpr wtr tower level heat tracing
Rpr 417 xfr line
Rpl Rx500 open dump vlv

There were 2 Es in Utils:

Rpr E joy aftercooler drain heat tracing
Rpr well flow meter heat tracing

In the United States there is more space where nobody is than where anybody is. This is what makes America what it is.

Gertrude Stein

GGC000219

From: Erik E. Smith
To: ABERDEEN GROUP
Date: 1/24/03 9:35AM
Subject: Utilities Process Hazard Analysis - 2002

The Process Hazard Analysis for the Utilities Area has been revalidated and is located in the PSM File Room (located in the front office). It is available for your review.

The Process Hazard Analysis for the Utilities Area included a review of the process hazards and other hazards associated with the Propane storage and supply system, the Chlorine storage and supply systems, the Vinyl Cooling towers, the Instrument Air system, and the Standby Generators (GN-001, GN-003, GN-004).

GGC000220

TO: Aberdeen Employees & Contractors

Interoffice
Communication

FROM: Erik Smith

DATE: January 24, 2003

SUBJECT: Utilities Process Hazard Analysis – 2002 Revalidation

The Process Hazard Analysis for the Utilities Area has been revalidated and is located in the PSM File Room (located in the front office). It is available for your review.

The Process Hazard Analysis for the Utilities Area included a review of the process hazards and other hazards associated with the Propane storage and supply system, the Chlorine storage and supply systems, the Vinyl Cooling towers, the Instrument Air system, and the Standby Generators (GN-001, GN-003, GN-004).

GN-001 provides standby power for the Instrument Air Compressors (CP-708 & CP-709), Airtek Air Dryer, Pall Air Dryer, #2A Emergency Cooling Water Pump, Reactor Seal Oil pumps, and the Catalyst Freezers.

GN-003 provides standby power for one of the #7 Cooling Tower Pumps.

GN-004 provides standby power for MCC7AB1-1 Substation. This substation currently provides power to the Vinyl Control Room including the UPS, emergency lighting, power transformers, air conditioning, 24 Volt DC Battery Chargers, pressurization blowers, and the plant telephone system.

From: JIMMY AUTREY
To: daily report
Date: 1/27/03 7:14AM
Subject: Mx - 1/26/03

There were 3 CI in Vinyl:
Rpr Rx746 steam stripping line
GGC on-going (LJT)
Rpr #5 GC
GGC complete (MCS)
Rpr Rx741 steam leaks
GGC complete (JWL,ARP)

There were 3 CI in Cmpd:
Rpr L1 feed hopper pulse air
GGC complete (MCS)
Rpr L2 sterico oil pump
GGC complete (LRH,GKP)
Rpr L1 wtr sterico unit
GGC on-going (CWH)

There was 1 CI in the Yard:
Rpl CP123 flex hose
GGC complete (RLW)

Never go to bed mad. Stay up and fight.
Phyllis Diller

GGC000222

From: ROGER MASSEY
To: mmr
Date: 1/29/03 8:22AM
Subject: Fwd: MORNING REPORT 1/28/03

There was an environmental release on Reactor 9. The I/O for this reactor was lost and the pressures did not indicate properly. The reactor went hydro-filled and relieved the PSV. A rough estimate of 200 Lbs of VCM release is currently estimated. The cause of the I/O failure on this reactor is under investigation with ABB.

GGC000223

From: Erik E. Smith
To: AUTREY, JIMMY; BAILEY, SAMUEL; King, Billy G.; Smith, Erik E.; TRNG
CONFIRM; WILLIAMS, ROBERT L.
Date: 1/29/03
Time: 7:00AM - 12:00PM
Subject: RCA - VCM Leak 1/20/2003
Place: Training Conference Room

Lets meet to perform the RCA for the VCM leak that occurred on January 20, 2003.

CC: Hull, John D.; Knittig, Doug; Markerson, Chris M.; NADLER, BRANDON; STAHL,
NEEDHAM V.

GGC000224

From: JIM DEMAND
To: CARRICO, PAUL; FREEBURGH, CHARLIE; SCHMITT, EDWARD; SEAL, MARK
Date: 1/29/03 3:39PM
Subject: Plaquemine PVC Plant Update - PM 1/29/03

No safety incidents and no environmental incidents since the one early this morning. The calculated VCM release has been revised to 576 pounds released this morning.

PVC - Train #1 - Boiling out. Train #2 in operation. Train #3 - 3 reactors in service. Remaining two reactors will return to service tomorrow. Train #4 nearing completion - Anticipate start-up in the early AM.

The ABB software patches were installed yesterday without incident.

Reactor Release - The causal factors leading to the release included a failure of an I/O point leading to failure of communication from that small system. ABB is investigating this failure. The other factor was due to lack of indication of a problem to the operator. This has been resolved today. Will advise updates from ABB as they make progress.

If you have any questions or concerns, please contact me.
Jim

CC: ACCARDO, JF; Christiansen, Stephen H.; COOPER, WAYNE; FONTENOT, GLYNN; MASSEY, ROGER; NADLER, BRANDON; TOLLESON, TED

GGC000225

From: LEONARD BUCHANAN
To: DAILY
Date: 1/29/03 5:25AM
Subject: MORNING REPORT

The PVC Unit had a safety or environmental opportunities yesterday.
Reactor-9 went hydro full due a computer hardware problem.

The Unit produced 35 batches with a VCM take of 1540.9 MM lbs.

Maintenance activity:

There were no product changes yesterday.

TR-1 2070
PSD: Okay
DR-2: 24 hours prime.
DR-6: 24 hours prime.

TR-2 1091
PSD: Okay
DR-1: 22 hours prime and 2 hours down time.
DR-3: 24 hours prime.

TR-3 1091
PSD: Okay
DR-4: 10 hours prime and 14 hours down time.
DR-5: 22 hours prime and 2 hours down time.

TR-4 Down.
PSD:
DR-7:
DR-8:

PVC Water Reuse System

High Lamella feed in: _____ T.S.S. PPM.

High Lamella feed out: _____ T.S.S. PPM.

GGC000226

From: Doug Knittig
To: AKINS, KENNETH; AUTREY, JIMMY; BAGWELL, AMY; BENDER, MELISSA; CARRICO, PAUL; Carter, Michael L.; CHIANG, SCHUMANN; Covington Jr., Roland David; COX, MICHELLE; DEMAND, JIM; DRONE, BEN; FREEBURGH, CHARLIE; Hegwood, Joseph B.; HOLLOWAY, RITA O.; Honeycutt, Larry D.; Jakel, Mark G.; JOINER, MIKE; King, Billy G.; KNITTIG, Amy E.; LANDRY, CHAD; LANGFORD, MICHAEL G.; Lindsey, Horace R.; Mackay, Reed; Markerson, Chris M.; MASSEY, ROGER; Minga, Regina D.; NADLER, BRANDON; PERRY, DARNELL; PLUNKETT, DAVID E.; SEAL, MARK; Seaver, Jeffery A.; SHIELDS, JEFFERY C.; Sneed, Rory H.; SOILEAU, SANDRA; STAHL, NEEDHAM V.; STRICKLAND, RODNEY B.; THERIOT, AMALIA; Wiles, Andrew J.; WILLIS, PATTI; WILSON, ANDY C.; Wood, Kelly D.; Zosel, William R.
Date: 2/13/03 7:58AM
Subject: Aberdeen Resin Plant Update through 2/12/03

Safety and Environmental

We had a second BOD permit violation last week. The COD and BOD numbers are falling indicating that the samples from this week should be below the permit limit. An RCA team has been formed.

Production

We made 2.60 MM pounds (51 batches).

February Production Prime Plan Forecast: 81.0 MM pounds

February Sales Plan Forecast: 87.0 MM pounds

February MTD Production: 34.3 MM pounds

Product Inventory: 9.1 MM pounds

February Aberdeen Compound MTD: 3.3 MM pounds

Missed Shipments: 3 - 5305 (End of run - cars in system)
9 - 5385 M (on run, BD high for OC)
2 - 5385 (holding cars for truck shipments)
1 - 5415 (on run)

Maintenance

Reactor cleaning will be completed today. (The cleaning was more difficult than expected.)

Product Mix

Train 1 - 5415.

Train 2 - 5385M.

Train 3 - 5385. Going to 5265 today.

From: Kelly D. Wood
To: Utilities Operations Staff
Date: 2/13/03 12:51PM
Subject: Fwd: Aberdeen Resin Plant Update through 2/12/03

Note the Safety and Environmental update. This appears to be primarily due to 1. Biodisc pump being down thus requiring Jacob to add pumps. 2. The recycle pump being down. and, 3. The aeration on Pond 3 being non dispersed. Pond 3's aeration is very localized instead of dispersed. In the future we need to make notes of this occurrence so we can react with maintenance work quicker.

GGC000228

From: Kelly D. Wood
To: Wells, James D.
Date: 2/17/03 7:18AM
Subject: Re: vaccum sustem

Do you think this is a better option than washing down? If so, why?

>>> James D. Wells 02/15/03 09:44AM >>>

Would you mind looking into the possibility of getting us a vaccum system installed in the lime room to control dust. We may be able to accomplish this with a regular vaccum cleaner. I believe we can control the dust if we vaccum about once a week.

GGC000229

From: KENNETH AKINS
To: NADLER, BRANDON
Date: 2/18/03 11:28AM
Subject: Re: Fwd: PVC Fugitive Emission Reduction

As a PVC plant, we are not subject to HON (we don't *manufacture* VCM) and not subject to LDAR as you know it. The VC NESHAP requires a formal LDAR program consistent with Subpart V, The National Emission Standard for Equipment Leaks (Fugitive Emission Sources). The VC NESHAP also exempts process units with less than 2% leakers (valves) from several sections of Subpart V, including:

- 1) Component tagging
- 2) Monthly valve monitoring
- 3) Record keeping
- 4) Reporting

So, in a nutshell, our LDAR program consists of an annual, random, 200 valve survey and closed-vent survey. Survey consists of Method 21 with 10,000 ppm as the leak definition for valves and 500 ppm for the closed-vent system. Connectors are not required to be inspected unless evidence of a potential leak is indicated by visual, audible, olfactory or other indication. We also do a quarterly open-ended line survey to document compliance with 61.242-6. I do not recall ever finding a valve with a reading over 10,000 ppm. In fact, any reading at all is rare. We have an internal standard of anything over a few hundred ppm is reported for repair. I credit this to standardization by the maintenance dept on a few good valves that are used exclusively in VCM service. Of course this also cuts down on amount of spare parts stocked, activator kits, limit switch arrangements and on and on.

For reporting of fugitives and permit issues, our permit is advantageous. Our Title V permit has an annual emission limitation of 138.6 TPY of VCM. The actual permit language says "This includes, but is not limited to, residual monomer content after stripping, reactor opening loss, and any fugitive emissions". Our RVCM and ROL run about 15-20 TPY, so, we have lots left over for fugitives. Also, our permit does not specify individual point sources with emission limits.

TRI emissions (fugitives) are calculated with data from a bagging study done many years ago. This number is probably conservative (we over-report) based on the actual emissions we see on our random surveys. Any big leaks or releases are added to these "normal" fugitive numbers and reported for TRI.

>>> BRANDON NADLER 02/14/03 07:34AM >>>

Kenny,

What is our history?

Anything we can offer to Plaquemine?

Brandon

GGC000231

From: WILLIAM (BILL) CALDWELL
To: CAVALIER, EMMITT
Date: 2/19/03 9:59AM
Subject: Agenda Items

In talking to Shea about the H&S audits he mentioned that we need discuss which modules we do at the various plants. I agree with him in that we need to do certain critical ones at the appropriate locations. For example, for the plants that handle VCM we need to include the VCM dosimetry program in the audit. For legal reasons we should be able to not only show we have those programs in place but that we audit them regularly to insure compliance and completeness.

GGC000232

From: BRANDON NADLER
To: DEMAND, JIM; GARNER, HILLARY; MASSEY, ROGER
Date: 2/21/03 7:33AM
Subject: Re: Fwd: PVC Fugitive Emission Reduction

Response to e-mail on PVC fugitive emissions.

As you can see from Kenny's explanation, the Aberdeen plant has some permit advantages over Plaquemine.

Brandon

GGC000233

From: KENNETH AKINS
To: FEC, DENNIS
Date: 2/21/03 1:05PM
Subject: Re: Fugitive Emission Reductions

Fugitive emissions 2001 - 4753 lbs
Fugitive emissions 2000 - 4927 lbs

Permit Limit for fugitives - Our permit doesn't have a separate limit for fugitives, just total VCM emissions 277,200 lbs.

Total 2001 emissions 27,842 lbs = 4,753 fugitive + 23,089 stack
Total 2000 emissions 29,170 lbs = 4,927 fugitive + 24,243 stack

Fugitive component count - Since we don't have to monitor other than the random 200 valve annual survey, we don't inventory all components.

Kenny

>>> DENNIS FEC 02/20/03 03:43PM >>>

Steve and Brandon,

With 3 PVC facilities within GG (Plaquemine, Aberdeen and OK City), I would like to collect information and compare plants regarding their fugitive emissions. Would each of you send me the following for your respective plants. **THANKS**

- 1) fugitive lbs. of vinyl emitted for the last 2 years (Steve, I already have this info. for OK City)
- 2) annual permitted number of fugitive lbs.
- 3) total number of fugitive components and a breakdown as to how many of these are pumps, valves, connectors, etc.

If you have any questions about this request, please give me a call.

Dennis C. Fec
Georgia Gulf Chemicals & Vinyls, L.L.C.
Environmental Manager
(225) 298 - 2044
fed@ggc.com

CC: BENDER, MELISSA; Huckabay, Joyce M.; NADLER, BRANDON

GGC000234

From: WILLIAM (BILL) CALDWELL
To: INET:jim-holden@aidtrain.com
Date: 2/24/03 3:57PM
Subject: Hazmat Training

Dear Jim,

We are looking to send a couple of our employees to a hazmat technician class. Most of the time of our response role will be that of an advisor concerning railcars of the chemicals we ship, vinyl chloride and PVC resin. We also ship some of our products by truck.

I would be interested in receiving a course schedule and other information about the types of training you have to offer.

Thanks,

Bill Caldwell
Safety Specialist
Georgia Gulf
PO Box 91
Aberdeen, Ms 39730
66-369-3573

GGC000235

From: BRANDON NADLER
To: COOPER, WAYNE
Date: 2/24/03 7:50AM
Subject: Fwd: EH & S Current Information

Environmental info -

Wayne,

Aberdeen had gone almost 3 years without an environmental incident and WHAM-

January we had a reportable VCM release - exceeded RQ.

January we had an exceedence of daily BOD on our bio system

February we had an exceedence of daily BOD on our bio system (continuation from the first incident)

GGC000236

From: WILLIAM (BILL) CALDWELL
To: INET:brosenkrans@ce.msstate.edu
Date: 3/3/03 10:23AM
Subject: Hazwoper

Ben,

I will bring you a copy of the emergency response plan when I come to Starkville Thursday.
The hazardous chemicals we would have to deal with at this plant are:

Vinyl Chloride
Chlorine - 7 ton containers and a 150# cylinder

We also have some heavy metal stabilizers containing barium or cadmium in drums or totes. These don't necessarily fall into the hazardous category but would be chemicals we would want to know how to contain in the event of a spill.
We also have other liquids such as plasticizers, motor oil and antifreeze in 55 gallon drums that we would need to respond to in the event of a leaking container.

There would also be the remote possibility of having to deal with an unfamiliar chemical that happened to be in the plant on a delivery truck.

Bill Caldwell
Safety Specialist
Georgia Gulf
Aberdeen, Ms

GGC000237

From: JIMMY AUTREY
To: daily report
Date: 3/5/03 6:41AM
Subject: Mx - 3/4/03

There were 2 CI in Vinyl last night:

Rpr Rx744 cw:

GGC complete (MCS)

Rpr FBD CaSt line leak

GGC complete (LRH,BRR)

There were 3 Es written in Vinyl yesterday:

Rpl Rx747 spray head

Rpr FBD CaSt line leak

Rpr Rx600 clean wall supply vly lite

There was 1 E in the Yard:

Reattach power line to pole

Death knows no denomination; death draws no color line. If you live right, death is a joke as far as fear is concerned.

Will Rogers

GGC000238

GEORGIA GULF ROOT CAUSE ANALYSIS
Blame

Prevention not

Date: March 5, 2003

Facilitator: Erik Smith – Operations Engineer

Team Members: Billy King – Vinyl Area Supervisor, Mark Bailey – Vinyl “A” Operator, Robert Williams – General Mechanic “A”, Jimmy Autrey – Maintenance Manager

Length of Investigation: 6 hours

Dept. Manager Approval: _____

Doug Knittig, Unit Manager Resin

I. PROBLEM DEFINITION

WHAT: 56 pounds of VCM vapor leaked out of a RX-744.

WHEN: January 20, 2003 at approximately 11:25 AM

WHERE: RX-744 Agitator lip seal water flush port

SIGNIFICANCE:

Safety: Potential personnel exposure

Environmental: Reportable release of 56 pounds of VCM

Production: One hour of reactor down time.

Maintenance: None

Frequency: First time.

II. C&E SUMMARY

At approximately 11:25 am 56 pounds of VCM was released from Reactor 744 through the reactor agitator lip seal water flush port. The flush water line block valve at the reactor agitator seal had been removed from the seal flush port.

The reactor was under pressure and contained some VCM. The reactor was down for a scheduled PM of the agitator gearbox.

A mechanic was cleaning resin out of the seal flush port at the time of the release. While cleaning out the port some material began to flow out of the port. Then more came out. The mechanic made two unsuccessful attempts to replace the block valve in order to stop the flow of material out of the port.

The mechanic had removed the block valve from the port to clean out the port. He believed the reactor to be clear of VCM. The mechanic believed the reactor to be clear of VCM because it was reported to him that the reactor was “down and empty”. The phrase “down and empty” in operations terminology means that the reactor is empty of slurry and is not currently in operation. The mechanic also believed the reactor to be clear of VCM because prior to removing the block valve, he cracked the valve open and no flow or pressure was observed. The block valve was not locked or tagged closed. No operations personnel were present when the valve was removed.

III. C&E SUMMARY – Cont.

The mechanic believed the flush port was plugged when he noticed resin on both sides of the union.

The mechanic opened the line at the union to determine why there was no water flowing in the flush water line. He believed that the line was at atmospheric pressure, that the material in the line was non-hazardous, that the reactor was clear of VCM, and that it was OK with operations to break the line. The line was assumed to be at atmospheric pressure because the block valves were closed and there was no flow. The contents of the line were assumed to be non-hazardous because the line normally contains water and because the mechanic believed the reactor to be clear of VCM. The mechanic believed it was OK with operations to break the line because he had asked the field operator if it was OK to break the line. The field operator asked the lead operator if it was OK to break the line. The lead operator indicated that the reactor was “down and empty” and it was OK to break the line as long as the valves were closed. The block valve at the reactor was closed by the mechanic and the flush water supply valve was closed by the “A” operator before the mechanic broke the line. The “A” operator went to lunch after closing the flush water supply valve.

The mechanic was told by the “A” operator that there was no flow in the flush line when the “A” operator opened the flush water supply valve. The mechanic requested that the “A” operator open the flush water supply valve so that the mechanic could verify that the leak had been fixed. When the mechanic arrived at the job site he was informed by a mechanic that was working on the agitator gearbox PM that the leak had already been repaired.

The mechanic obtained a permit from the vinyl supervisor before going to the work site.

The flush water supply line valve was closed by the “A” operator when the mechanic arrived to fix the leak.. The vinyl supervisor had asked the lead operator to tell the “A” operator to close the supply valve to the agitator seal water flush line so that the mechanics could fix the leak on the check valve.

The vinyl supervisor wrote a work order and a permit to fix the leak on the seal water flush line check valve after he noticed it was leaking.

IV. SOLUTIONS

Causes	Corrective Actions	Name	Due	Done
--------	--------------------	------	-----	------

1. Mechanic removed an isolation valve. The valve was not identified as an isolation valve.	Train maintenance personnel of the need to apply personal locks/tags to isolation valves prior to breaking a line per the Line Opening Procedure II.B.2. Train maintenance personnel on Line Opening Procedure.			
2. Permit for repairing the check valve leak did not take into consideration that the flush line may need to be opened in order to repair the leak, i.e. replace the check valve. Isolation valves were not identified (locked/tagged).	Train permit writers to treat leak repair permits as a potential line opening permit which requires identification of energy sources and isolation valves as per the Line Opening Procedure. Train permit writers on Line Opening Procedure.			
3. Mechanic believed "down and empty" meant cleared.	Train maintenance personnel on the definition of "down and empty" and remind them that terms may mean different things to different individuals.			

From: JIMMY AUTREY
To: King, Billy G.; Knittig, Doug; Mackay, Reed; Smith, Erik E.; STAHL, NEEDHAM V.
Date: 3/6/03 9:17AM
Subject: Cyclone Dryer Dusting

DAM and I have spent some time in conversation and thought and really haven't come up with any viable additional options to reduce dusting out of the stacks. We don't recommend putting up the "box" again this year. Yes, it may have reduced what went outside the fence line, but it sure made a bigger mess inside the fence.

We do recommend that we proceed with installing the inlet boxes, at least until the BGK dust minimization project is operational. Does anyone know if a work order is in to construct and install these boxes? We can also research vendors for an improved filter roll apparatus if you desire.

Let me know if we need to discuss any of this further.

CC: Hegwood, Joseph B.; Miller, Daniel A.

GGC000242

From: Michael L. Carter
To: ANDREWS, FRANKLIN; BAGWELL, AMY; Carter, Beverly S.; Honeycutt, Larry D.
Date: 3/6/03 10:02AM
Subject: Safety and Health Audit

As many of you know we had some visitors a week ago who completed a Safety and Health audit. Overall the audit went well. There are some items I do want to pass along.

1. Facial Hair - It was noted that the team observed several employees across the plant who had facial hair - were not cleaned shaven. I would ask each of you to take time to review your areas. If you have employees who continue to arrive at work or you have to constantly remind them to shave - please take the appropriate action. Please let me know. I guess I am ready to take disciplinary action if the problem continues.

2. Rail car chocks - Dean they documented several cars which were not properly chocked. I think most were Railserve issues. But want you to visit this subject in your toolbox. Also please ask Sam to have this as an agenda item. The found a PA car not chocked and a Alcohol Car. Plus several VCM not consistently chocked. Please forward a copy of the sign in sheet to me.

Thanks for your support.

Michael

GGC000243

From: WILLIAM (BILL) CALDWELL
To: LANGFORD, MICHAEL G.; WHITE, CHRISTOPHER T
Date: 3/6/02 4:01PM
Subject: Dosimetry

Mike,

Chris White had an overexposure on the 26th - day shift. He did not indicate on the card what job he was working that day. Could you please find out and let me know.

Thanks

GGC000244

From: NEEDHAM V. STAHL
To: King, Billy G.; PLUNKETT, DAVID E.; Smith, Erik E.
Date: 3/14/03 4:30PM
Subject: Re: Procedure for work around the reactor?

Yes, Yes, Yes, etc.

Does this mean we have to standardize all the procedures dealing with VCM which will include other vessels, pumps, lines, etc.? If not, I don't like the idea of having double standards when dealing with one chemical.

What I see: Lock out/ Tag out was not used. Why get into vessel specific procedures?

>>> Erik E. Smith 03/14/03 03:59PM >>>

One of the items considered for the VCM Leak RCA is a requirement to clear the reactor of VCM prior to working on lines that are within one block valve of the reactor.

Do we have a procedure that can be modified to include this requirement??

CC: Knittig, Doug

GGC000245

From: BRANDON NADLER
To: Carter, Michael L.
Date: 3/19/03 5:12PM
Subject: A few items

Michael -

1. Railcar inspections - I received a telephone call fairly late Wednesday afternoon informing me that we need to implement this ASAP.

Lets discuss how we will implement this first thing Thursday morning.

2. I rode out to the inbound track to get some ideas about how we might want to approach these inspections. On my way out there was a Butler truck driver transloading product. He was not wearing his hard hat or safety glasses (actually he had monogoggles). I had a little talk with him about wearing PPE and he very suddenly became very polite. Please follow up with Butler about providing drivers who will follow our policy.

3. I noticed on the track parallel to the silos where we transload that the common practice is to cut the tie wraps and let the tie wrap and tag fall on the ground. Please also address this.

Brandon

GGC000246

From: Michael L. Carter
To: Honeycutt, Larry D.
Date: 3/20/03 7:41AM
Subject: Fwd: A few items

Please read attached.

1. Call Claude and tell him that all drivers must have safety PPE and wear in plant.
2. Please schedule someone in to complete housekeeping. Also contact J.Lee and discuss assistance in cleaning up our areas - seals, tags, resin.....

Michael

GGC000247

From: Rory H. Sneed
To: AUTREY, JIMMY; Carter, Michael L.; Knittig, Doug; STAHL, NEEDHAM V.
Date: 3/20/03 10:35AM
Subject: Re: PPE

I'm also in the process of relaying the message through tool boxes. Should be done by next week. We'll also have a grace period before implementing any discipline. Presently targeting the end of April. Earplugs are probably our biggest issue in Compound/Plasticizer now that lead is no longer in the plant.

I definitely agree with Needham's comments on consistency. Maybe it's worthwhile for us to all get together and discuss details before implementing anything.

>>> NEEDHAM V. STAHL 03/20/03 08:42AM >>>

Since Safety related issues are part of an employee's total work performance, we will have to be careful about what level of discipline is initially given. We don't want to hurt ourselves in the future by giving a verbal or written warning to someone that has a lengthy suspension on their record because of poor work performance. The tracking and consistency of our actions, as a plant, is a must to prevent repercussions later. Since our departments overlap in this area, we will need a set of guidelines to follow when dealing with a non-departmental employee.

>>> Doug Knittig 03/20/03 08:18AM >>>

I have had a toolbox with each shift. We are focusing on catalyst PPE and breathing air. (I am assume earplugs, glasses, steel toes, Nomex are normal.) We are going with the "friendly" approach for one month. Our start date was March 17th. So starting April 17 we will go with verbals, letters etc. We should be prepared to take action on ourselves and supervisors as well. We have a supervisors meeting next week and this will be a major topic. We will focus our discipline on the trained focus areas and expand as we see other issues.

Thanks, Doug

>>> Michael L. Carter 03/20/03 07:53AM >>>

Have you guys started giving verbals for PPE yet. Just wanted to make sure we are all consistent on this.

Michael

CC: BEALL, JOE

GGC000248

From: BRANDON NADLER
To: AUTREY, JIMMY
Date: 3/24/03 10:00AM
Subject: Safety Expectations

Jimmy,

Since you were out the last 2 Mondays, one thing I wanted to make sure you are aware of that was reviewed on Monday.

It is the expectation of each employee to know and follow all safety regulations at our site. It is the expectation of each supervisor to know and follow safety regulations by his words and actions and to set the expectation for their employees to do so. Preferably this will occur via positive reinforcement in a proactive manner. If or when an employee chooses not to abide by safety regulations, it is the expectation that the supervisor will address this at a level commensurate to the violation. Because of the important nature of safety, any violation should have a MINIMAL disciplinary action of a formal meeting (documented) with the supervisor. Warnings or reminders to "use your PPE" are not sufficient reinforcement to communicate the seriousness of violating a safety regulation. Of course, repeated minor violations, or more significant violations should be addressed with increasing levels of disciplinary action such as a letter, suspension or termination if warranted.

I've asked all of the other manager's to review this expectation with their supervisors and ensure that it is being applied throughout the site.

Also - the same emphasis should be placed on contract employees. Because of co-employment issues, a formal meeting should be held between the Georgia Gulf contact and the contractor's supervisor.

Thanks,
Brandon

GGC000249

From: JIMMY AUTREY
To: daily report
Date: 3/28/03 6:38AM
Subject: Mx - 3/27/03

There were 3 CI in Vinyl:
Finish heading up Rx745

TWS

Rpr EM s ko tank piping leak

GGC complete (MAT)

Rpr T2S flowmeter

GGC complete (DWN)

There were 4 Es written in Vinyl yesterday:
W Incinerator will not stay lit
#4 dryer atmer feeder will not run
Unplug Rx742 pt
Cal Rx744 cw

There were 3 Es in Cmpd:
L1 gran sterco will not heat up
Rpr L1 resin feeder hopper hi level
Rpl L2 stabilizer pump rv

The enemy of my enemy is my friend.
Arabic proverb

GGC000250

From: American Society of Safety Engineers <cfaron@asse.org>
To: ASSE Members <markersonc@ggc.com>
Date: 4/3/03 11:04AM
Subject: New Confined Spaces Program - Z117.1 Standard: Conference Call

=====

Greetings to all of you!!!

Spring is in the air and that can only mean one thing - "YES" - it is time to announce that the significantly revised ANSI/ASSE Z117.1-2003 Standard - Safety Requirements for Confined Spaces has been published and is now available!!!!

Cited in OSHA interpretations, the Z117.1 Standard is a significant standard used by many, if not most, SH&E professionals as a resource for entry into confined spaces.

We are trying something new with this newest standard. ASSE is hosting a Confined Spaces Program featuring a technical conference call on April 29, 2003 from 11:00 am to 12:30 pm CST. This program is only \$75 for members and includes the following:

1. The new Z117.1-2003 Standard
2. The Z117.1-1995 Standard (Excellent to have the older standard for historical and benchmarking reasons)
3. A 90 minute conference call presentation being given by Edward Grund (Z117 Committee Chair) and Craig Schroll (Active Z117 Committee member). The emphasis will be on the key differences between the 1995 and 2003 standards.
4. A 10 page written presentation about the revised standard.
5. The ability to submit your questions via e-mail to the speakers and moderator.

As you can see this is a heck of a deal for those of you interested in the issue of confined spaces and the ANSI/ASSE Z117.1 Standard. If you would like to participate please contact our Customer Service Department at 847/699-2929 or visit our web site at <http://www.asse.org/fr3384c.htm>. We will get you registered, get you the conference call access code, and get the materials out to you for prior review.

Thanks and Regards, Tim Fisher with the ASSE Council on Practices and Standards.

=====

*** REMOVAL INSTRUCTIONS ***

If you would like to be removed from future mailings, please click on the URL below. In most mail programs this will cause your web browser to open and access the page where you can unsubscribe from these mailings.

http://www.memberconnections.com/olc/pub/SSE/blastmailopt/blastmailopt.cgi?FNC=WELCOME__Awelcome_html__BR__361767__SSE-20030403102726__Poxpdor9f9wK4VWogQ4OUprif58

If clicking the URL doesn't work, you can copy it, and paste it into your browser to access the web page.

GGC000251

From: WILLIAM (BILL) CALDWELL
To: SARGENT, SHEA P
Date: 4/10/03 10:22AM
Subject: Re: VCM monitoring Again

I don't have that info on the IH sheets. I have the old dosimetry record cards and I just yesterday put those results into the IH system. We had one over exposure - John David Rogers in the old unit, a 3.15. Do you want me to send you a copy of the cards?

>>> SHEA P SARGENT 04/10/03 11:02AM >>>

Can you send me the data from the sampling done while I was there once you get it in.

Appreciate you,
Shea

GGC000252

From: SHEA, P SARGENT
To: NADLER, BRANDON
Date: 4/14/03 12:21PM
Subject: 2003 IH Report- Aberdeen Resin Plant

Attached is the Aberdeen Resin Plant IH report and results.

The results were very good. There is still an effort out there to remove PVC dust from the list of nuisance dusts and create a stand-alone exposure limit for PVC dust. This limit would be for respirable PVC dust and could possibly be as low as 1 mg/M³ (compared to the current PEL of 5 mg/M³, and TLV of 3 mg/M³). The results obtained from this IH survey points to the Aberdeen plant having no issues with this exposure limit change, if it should occur. All results for respirable and total dust were far, far below the acceptable exposure limits for each. In fact, most respirable dust samples were non-detects.

Don't hesitate to call if there are any questions or concerns about the sampling results.

Shea Sargent
Corporate Industrial Hygienist
Georgia Gulf Corp. and Affiliates
PO BOX 629
Plaquemine, LA 70765
office 225 685-2642
pager 800 225-9986

CC: CALDWELL, WILLIAM (BILL); Carter, Michael L.; Knittig, Doug

GGC000253

From: SHEA P SARGENT
To: NADLER, BRANDON
Date: 4/14/03 12:21PM
Subject: 2003 IH Report- Aberdeen Resin Plant

Attached is the Aberdeen Resin Plant IH report and results.

The results were very good. There is still an effort out there to remove PVC dust from the list of nuisance dusts and create a stand-alone exposure limit for PVC dust. This limit would be for respirable PVC dust and could possibly be as low as 1 mg/M³ (compared to the current PEL of 5 mg/M³, and TLV of 3 mg/M³). The results obtained from this IH survey points to the Aberdeen plant having no issues with this exposure limit change, if it should occur. All results for respirable and total dust were far, far below the acceptable exposure limits for each. In fact, most respirable dust samples were non-detects.

Don't hesitate to call if there are any questions or concerns about the sampling results.

Shea Sargent
Corporate Industrial Hygienist
Georgia Gulf Corp. and Affiliates
PO BOX 629
Plaquemine, LA 70765
office 225 685-2642
pager 800 225-9986

CC: CALDWELL, WILLIAM (BILL); Carter, Michael L.; Knittig, Doug

GGC000254

From: SHEA P SARGENT
To: NADLER, BRANDON
Date: 4/14/03 12:16PM
Subject: PVC Dust Survey- 1999

Attached:

FYI

PVC dust survey from 1999

CC: CALDWELL, WILLIAM (BILL); Carter, Michael L.; Knittig, Doug

GGC000255

Table I.

Dust Area Monitoring Results				
Aberdeen Chemical Plant (Oct-Nov '99)				
Area	Date	Sample Location	Sample Type	Results (mg/M ³) ¹
Cyclone Dryer Area	10/28/99	East set of resin hoppers- Ground level cyclone area- downwind	Total	3.62
	10/29/99	W set of resin hoppers, ground level- cyclone	Total	1.36
	11/2/99	W set of screeners, 3rd floor, cyclone dryers	Total	2.02
	11/2/99	W set of screeners, 3rd floor, cyclone dryers	Respirable	0.17
	11/3/99	E of west set of resin hoppers- cyclone dryer area	Total	2.79
	11/3/99	E of west set of resin hoppers- cyclone dryer area	Respirable	<0.01
Rotary Dryer Area	10/28/99	Support beam, E end of 5 and 6 rotary dryers	Total	0.69
	10/29/99	W of #5 screener, 2nd floor, rotary dryer area	Total	0.15
	11/2/99	Support beam, N of stearate supersack unloading	Total	0.08
	11/2/99	Support beam, N of stearate supersack unloading	Respirable	0.09
	11/4/99	Support beam between #8 and #7 rotary dryers	Total	0.51
	11/4/99	Support beam between #8 and #7 rotary dryers	Respirable	0.06
Fluid Bed Dryer	10/28/99	Fluid Bed- Ground level , NW of screeners	Total	0.13
	10/29/99	N of Fluid Bed dryers, 3rd floor, on platform	Total	5.7
	11/4/99	Between screeners at Fluid Bed dryers, ground floor	Total	3.31
	11/4/99	Between screeners at Fluid Bed dryers, ground floor	Respirable	0.02
Yard	10/29/99	W of resin loading rack, 600 series silos, Yard	Total	0.26
	11/3/99	W of 600 series silos, Yard	Total	0.03

¹ milligrams of dust per cubic meter of air sampled

* The OSHA-PEL is 15 mg/M³ for total dust and 5 mg/M³ for respirable dust

note: ACGIH Threshold Limit Values (TLVs) : 10 mg/M³ for total dust and 3 mg/M³ for respirable dust

From: NEEDHAM V. STAHL
To: Vinyl Op. / Maint.; Vinyl Shift Supervisors
Date: 4/14/03 3:13PM
Subject: Safety

Reminder: It is our responsibility to insure safety within our department. This includes each and everyone that enters the department boundaries follows all safety rules and regulations.

There have been several operating procedures for all to read and sign off. I do not expect any safety item in these procedures violated.

Each one of us are responsible for and will be held accountable for our actions or the lack of our actions. It will be best for all of us to make sure we understand and follow all guidelines, rules, etc. that are associated with our department and plant.

GGC000257

From: JIMMY AUTREY
To: daily report
Date: 4/22/03 5:42AM
Subject: Mx - 4/21/03

There were 4 Es written in Vinyl yesterday:
Rpr centrate line leak
Unplug Rx400 pt
Rpl vlv under T3S SHE rd
Rpl WM e hpsw pump cplg

There were 3 Es written in Crmpd/Pz:
Rpr old L3 elevator door
Chk L1 gran motor for vibration
Rpr R2 funnel vlv

There was 1 E in the Yard:
Rpl #3 spot long vap line

The weak have one weapon - the errors of those who think they are strong.
Georges Bidault

GGC000258

From: KENNETH AKINS
To: BROWN, DANIEL
Date: 4/25/03 2:27PM
Subject: Fwd: Batchwater Stripper Chart

Attached is the raw data for the last 5 years. I count a total of 33 measurements in excess of 10ppm. My guess is that process data would refute at least some of these measurements.

Let me know what we need to do next,
Kenny

CC: Knittig, Doug; NADLER, BRANDON

GGC000259

From: BRANDON NADLER
To: DEMAND, JIM
Date: 4/25/03 3:15PM
Subject: Fwd: Batchwater Stripper Chart

Jim,

We recently experienced a high residual vinyl analysis on our batchwater stripper. We believe that this may be an analytical or contamination issue as the process is very stable and the results are virtually always less than one ppm, although we did find a few items in need of repair as a result of investigating. This water is stripped of vinyl prior to discharge from the plant, and ultimately goes to the bio treatment system. We have a specification of 10 ppm vinyl. While there is a maximum vinyl concentration specified for this stripper, there are no reporting requirements associated with this equipment or stream. When this recent event occurred, Kenny Akins, Doug Knitting and I discussed what, if anything should be done. We have notified Dan Brown and he is investigating if we should report this via any means or make any type of notifications. We also have implemented some administrative controls to ensure if a high analysis occurs that Doug and/or Kenny are notified so we can quickly investigate.

Brandon

GGC000260

From: William J. Davis
To: Sneed, Rory H.
Date: 4/25/03 12:30AM
Subject: LINE 1 MB CHUTE LEAK.

We have a leak on line 1 mb chute that needs to be repaired some time soon, I have put w/o in but we will have to set this up with maint. The leak is at the bottom vibrator bracket welds. The welds have cracked open on both sides.

CC: AUTREY, JIMMY

GGC000261

From: Michael L. Carter
To: DEMAND, JIM; FREEBURGH, CHARLIE; Honeycutt, Larry D.; Knittig, Doug;
NADLER, BRANDON; NOBLES, BENNIE; QUINT, PAT; RIGGS, DAVE; STAHL, NEEDHAM V.;
VARNADO, STEVE; VENDT, FRANK
Date: 5/4/03 1:42PM
Subject: KCS - Derail May 2, 2003

Please see the attached summary of the field notes from the May 2, 2003 KCS derailment involving loaded VCM cars. I set up a file folder on the Aberdeen K "Share" Drive which contains the digital pictures. Note I tried to set it up on the Plaquemine drive but did not have access to do this. The name of the file is:

K: KCS derailment050203. Please call if you have any questions.

Michael L. Carter

GGC000262

From: Rory H. Sneed
To: Compound Supervisors; NICKERSON, TED; Temporary Supervisors
Date: 5/5/03 8:30AM
Subject: Fwd: Aberdeen Resin Plant Update through 5/4/03

In case you didn't hear about the derail that occurred Fri., here is the information. This was offsite, so it's unlikely that you would have had to do anything. But it's good for you to know about in case you get any questions.

GGC000264

From: Doug Knittig
To: AKINS, KENNETH; AUTREY, JIMMY; BAGWELL, AMY; BENDER, MELISSA; CARRICO, PAUL; Carter, Michael L.; CHIANG, SCHUMANN; Covington Jr., Roland David; COX, MICHELLE; CRAFT, BOB; DEMAND, JIM; DRONE, BEN; FREEBURGH, CHARLIE; HAMILTON, JOHN R.; Hegwood, Joseph B.; HOLLOWAY, RITA O.; Honeycutt, Larry D.; Jakel, Mark G.; JOINER, MIKE; King, Billy G.; KNITTIG, Amy E.; LANDRY, CHAD; LANGFORD, MICHAEL G.; Lindsey, Horace R.; Mackay, Reed; Markerson, Chris M.; MASSEY, ROGER; McDONALD, CHARLIE; Minga, Regina D.; NADLER, BRANDON; PERRY, DARNELL; PLUNKETT, DAVID E.; Polk, Randall E.; SEAL, MARK; Seaver, Jeffery A.; SHIELDS, JEFFERY C.; Smith, Erik E.; Sneed, Rory H.; SOILEAU, SANDRA; STAHL, NEEDHAM V.; STRICKLAND, RODNEY B.; THERIOT, AMALIA; Wiles, Andrew J.; WILLIS, PATTI; WILSON, ANDY C.; Wood, Kelly D.; Zosel, William R.
Date: 5/5/03 7:22AM
Subject: Aberdeen Resin Plant Update through 5/4/03

Safety and Environmental

Friday, May 2nd there were 7 full VCM cars derailed south of the plant on the KCS line. There were no leaks and no injuries. 4 cars were overturned. 3 were upright but derailed. All the cars were rerailed this weekend, placed on a side track, and the service track is back in operation.

The 4 overturned cars will be evaluated today for final disposition. Current options are 1)unload in the plant or 2) transload offsite. This determination will be made based on the condition of the cars.

Production

We made 2.7, 2.8, and 3.0 MM pounds (54, 55, and 59 batches).

May Production Plan:	88.0 MM pounds
May Sales Plan in Schedule:	85.0 MM pounds

Product Inventory:	11.5 MM pounds
--------------------	----------------

May Aberdeen Compound:	5265 - 0.8 MM pounds
	5385 - 0.5 MM pounds

Missed Shipments:

9 - 5385 - (1 Gentek, 8 Heartland)

Maintenance

Nothing to report.

Product Mix

Train 1 - 5385, 5395 (one - internal)

Train 2 - 5385M.

Train 3 - 5385.

GGC000265

ABERDEEN RESIN PRODUCTION REPORT

Date: 5/5/03	Total Weekly Production	Production Rates		Product Quality		INVENTORY	INVENTORY		INVENTORY CHANGE (+/-)	Product Changes		Injuries	Emissions
		Average per C. D.	Projected per C. D.	% Prime	% Off Grade	% BC	Total	Total		# Scheduled Last Week	# Made Last Week		
PVC, MM Lbs.	19.80	2.83	2.90	99.00	1.00	0.00	11.50	1.50	3	3	3	0	0

Comments:

May Production Estimate Prime (plan) is 88.0 MM pounds.
May Sales Estimate (Plan) is 85.0 MM pounds.

May MTD Production is 11.5 MM pounds (prime).

K:\rost\Monday\date

From: WILLIAM (BILL) CALDWELL
To: Area Supervisors; Department Heads
Date: 5/7/03 11:44AM
Subject: MSA Face Piece glasses inserts

There have been several request for prescription inserts for the supplied air respirator face pieces. I have ordered a supply of the holders for these and need to communicate how to order inserts for employees that need them.

Employees that need prescription inserts should obtain a current, within the last twelve months, prescription from their eye care professional. I will send the prescription along with the insert holder to Vallen. The inserts with the prescribed lens will be sent back to the plant and I will notify the employees of their arrival.

Please don't hesitate to contact me with questions or concerns.

GGC000267

From: JIMMY AUTREY
To: daily report
Date: 5/7/03 5:45AM
Subject: Mx - 5/6/03

There were 5 Es written yesterday in Vinyl:
Rpr EM breathing air water trap
Rpr EM mid rcvr level
Rpr fvcn chg pump air supply vlv
Rpl centrate system caustic pump cplg
Unplug Rx500 pt

There were 3 Es in Cmpd/Pz:
Rpr P1 alcohol chg meter
Rpr L1 mixer speed control
Rpr L1 kneader hot oil sov

Diplomacy is the art of saying "nice doggie" until you can find a rock.
Will Rogers

GGC000268

From: "Peter de la Cruz" <delacruz@khlaw.com>
To: <maria.cochran@atofina.com>, <sandi.murphy@atofina.com>, <skhall@dow.com>, <dpun@fpcusa.com>, <mbachynsky@fpcusa.com>, <rkelley@fpcusa.com>, <akinsk@ggc.com>, <Debbie_Schober@oxy.com>, <Ray_Givonetti@oxy.com>, <Ross_Jones@oxy.com>, <Frank_Borrelli@plastics.org>, <James.Lewis@polyone.com>, <David.A.Labelle@saint-gobain.com>, <Martha.J.Bixby@saint-gobain.com>, <JYonge@shin-tech.com>
Date: 5/7/03 9:32AM
Subject: -Summary of comments on OSHA proposed changes to vinylchloride standard

In December 2002, the Vinyl Institute filed comments on the Occupational Safety and Health Administration (OSHA) proposed changes to the vinyl chloride standard, which were part of the agency's "Standards Improvement Project - Phase II" proposed rule.

We were asked to review the docket and note any relevant comments, particularly those adverse to the VI's position. The attached chart, in MS Word format, reviews the comments filed that have any relevance to the section of interest to the VI. The comments are supportive of the OSHA proposal, which the VI endorsed, except for similar comments filed by five or six labor groups who challenged the changes as "relaxation" of the standards without adequate support.

Additionally, on April 21, 2003, OSHA announced an informal public hearing to receive testimony and documentary evidence relevant to issues raised by the Standards Improvement Project - Phase II proposed rule (68 FR 19472). The rule was originally published in the Federal Register on October 31, 2002 (67 FR 66494). The meeting will be held in Washington, DC on July 8 and 9, 2003.

A copy of the comments we filed with OSHA are also attached.

Regards,
Peter

CC: <mrachlin@dow.com>, "Tom Berger" <Berger@khlaw.com>, "J.C. Walker" <Walker@khlaw.com>, <William_F_Carroll@oxy.com>

GGC000269

From: WILLIAM (BILL) CALDWELL
To: AUTREY, JIMMY
Date: 5/7/03 12:52PM
Subject: Re: 2 Things...

What type of injury log? We have the recordable info on the OSHA 200na d300 logs. The incident rate charts are available but the historical ones include the whole plant. I have a running log of incidents that Chris last updated in June of 2002.

We ordered those bags from Galls. If I'm not mistaken you took care of ordering those. I have a current catalog if needed and will help in any way.

>>> JIMMY AUTREY 05/06/03 12:46PM >>>

How far back does our injury log go? Can I get a record of it for the Mx Dept, and Utilities, only?

Second, weren't you the one who got me an airmask bag for Charlie Holcomb? If so, where can I get some more?

GGC000270

From: WILLIAM (BILL) CALDWELL
To: STAHL, NEEDHAM V.
Date: 5/8/03 11:37AM
Subject: Re: MSA Face Piece glasses inserts

Done. Let me know if I can help.

>>> NEEDHAM V. STAHL 05/08/03 12:06PM >>>

Through some forms for safety glasses in my box. I'm sure some one will need them. I'll need one before long anyway.

>>> WILLIAM (BILL) CALDWELL 05/07/03 12:44PM >>>

There have been several request for prescription inserts for the supplied air respirator face pieces. I have ordered a supply of the holders for these and need to communicate how to order inserts for employees that need them.

Employees that need prescription inserts should obtain a current, within the last twelve months, prescription from their eye care professional. I will send the prescription along with the insert holder to Vallen. The inserts with the prescribed lens will be sent back to the plant and I will notify the employees of their arrival.

Please don't hesitate to contact me with questions or concerns.

GGC000271

From: SAMUEL BROWN
To: I/ESHOP
Date: 5/8/03 12:27PM
Subject: Fwd: MSA Face Piece glasses inserts

If you need these please reply.

GGC000272

From: JIMMY AUTREY
To: daily report
Date: 5/13/03 5:48AM
Subject: Mx - 5/12/03

There were 2 CI in Vinyl:
Rpr 282 xfr vlv motor
Irvin complete
Rpr Rx745 rinse vlv coil
GGC complete (MCS)

There were 9 Es written in Vinyl yesterday:
Rpr Rx600 rinse to cond vlv air line
Rpr brine tank suction vlv
Unplug Rx600 inert vent
Rpr 282 xfr vlv motor mount
Rpr 692 silo pulser
Rpr T2S column flush chk vlv leak
Rpr 690 silo level
Rpl EM s mech seal wtr pump
Rpr ERS s ring seal wtr pump

The teeth are smiling, but is the heart?
Congo proverb

GGC000273

From: Doug Knittig
To: AKINS, KENNETH; BAGWELL, AMY; BEALL, JOE; BENDER, MELISSA; BROWN, SAMUEL; CALDWELL, WILLIAM (BILL); Carter, Beverly S.; Carter, Michael L.; Doug Knittig; English, William C.; HAMILTON, JOHN R.; Hegwood, Joseph B.; Honeycutt, Larry D.; Hull, John D.; KNITTIG, Amy E.; Mackay, Reed; Miller, Daniel A.; NADLER, BRANDON; NICKERSON, TED; Seaver, Jeffery A.; Smith, Erik E.; Sneed, Rory H.; WILSON, ANDY C.; Wood, Kelly D.
Date: 5/13/03
Time: 1:00PM - 1:45PM
Subject: NESHAPs (National Emission Standards for Hazardous Air Pollutants) - VCM
Place: Auditorium

I have worked up a training class for the operators but thought many others would be interested. I plan to cover a little history, Subpart F (VCM), Subpart V (Fugitive Emissions), and Method 107+. Obviously, based on the time, I plan to move through the information quickly highlighting the areas that are appropriate for a PVC producing plant.

If I missed anyone you are welcome to invite them.

Thanks, Doug

GGC000274

From: WILLIAM (BILL) CALDWELL
To: Little, James A.
Date: 5/14/03 8:36AM
Subject: Re: Quiz

This whole thing started when I was researching the information on VCM. When I came across the info that said the threshold was in the 3,000 ppm range I was shocked because I know people who talk about detecting leaks and such by smell. If that is true then those folks are getting a pretty good dose of VC. The guys I polled here all told me they can smell it in the range of 5-20 ppm. I don't know. Even if the 260 is correct that's still a high exposure.

The 3,000 number is the one quoted on most sites and the ones affiliated with law firms use that to make a case for a pretty massive exposure event if you smell it.

I guess its not a big deal and I don't know how you could research it even if you wanted to. I know I'm not going to keep sniffing higher and higher concentrations until I can smell it !

>>> James A. Little 05/14/03 09:18AM >>>

Most of the information I have found estimate the odor threshold of VCM between 2000 - 3000 ppm. However, the Coast Guard CHRIS manual has the odor threshold at 260 ppm. So that is the one I use.

Let me know if you were hoping more detailed information.
Jim

>>> WILLIAM (BILL) CALDWELL 05/13/03 01:18PM >>>
VCM quiz of the day.

What is the odor threshold for VCM?

GGC000275

From: WILLIAM (BILL) CALDWELL
To: Dobbins, Dwight; Huckabay, Joyce M.; Little, James A.; SARGENT, SHEA P
Date: 5/16/03 12:01PM
Subject: Re: VCM

I see our Corporate Industrial Hygienist has come through :)

This originated after most of the material that I came across that reported an odor threshold used the 3,000 ppm number. My reaction was that, if this was true, people walking through the unit who smell an actual leak are getting a huge exposure.

Where do you get volunteers to participate in a VCM odor threshold study??

>>> SHEA P SARGENT 05/16/03 12:40PM >>>

There's really not one since the range is so wide....most publications say that it depends on the "nose" of the person...and the range is anywhere from 0.25 to 3000 ppm in most studies I've seen. AIHA says 10-20 ppm, I'm assuming that's their own study.

(From Patty's IH) Odor Threshold:

Although vinyl chloride has an odor at high concn, it is of no value in preventing excessive exposure. The actual vapor concn that can be detected has never been adequately determined and varies from one individual to another, from impurities in the sample and probably from duration of exposure.
[Clayton, G.D., F.E. Clayton (eds.) Patty's Industrial Hygiene and Toxicology. Volumes 2A, 2B, 2C, 2D, 2E, 2F: Toxicology. 4th ed. New York, NY: John Wiley & Sons Inc., 1993-1994. 4176]**PEER REVIEWED**

Basically, too high to use thy nose as a measuring device.

Was this question posed out of curiosity?

>>> Joyce M. Huckabay 05/16/03 11:44AM >>>
good question - something over 1 ppm.

Shea?

>>> WILLIAM (BILL) CALDWELL 05/13/03 03:19PM >>>
VCM quiz of the day.

What is the odor threshold for VCM?

GGC000276

From: JIMMY AUTREY
To: daily report
Date: 5/21/03 5:34AM
Subject: Mx - 5/20/03

There were 5 Es written in Vinyl yesterday:
D comp will not start
Rpl debox xfr vlv sprocket
Rpr Rx600 emerg kill vlvs
Rpl T2S keyboard fuse
Rpr Rx747 steam stripping line leak

Let us leave pretty women to men without imagination.
Marcel Proust

GGC000277

From: JIMMY AUTREY
To: daily report
Date: 5/23/03 6:50AM
Subject: Mx - 5/22/03

There was 1 CI in Vinyl:
Rpr s bws pt
Irvin complete

There were 8 Es written in Vinyl yesterday:
Rpr s bws leak
Acid clean Rx742 cond
Cal Rx745 total cw flow
Cal 690 silo level
Cal bd tank pt
Unplug EM comp disch pt
Unplug EM separator pt
Rpr SAM alcotex makeup agitator

There was 1 E in Pz:
Rpr N2 blower

When people are free to do as they please, they usually imitate each other.
Eric Hoffer

GGC000278

From: BRANDON NADLER
To: DEMAND, JIM
Date: 5/23/03 11:33AM
Subject: Re: Unloading Operation

Yes - we use breathing air - required when connecting hoses and starting the unloading process until fittings are verified to not be leaking and when shutting down and disconnecting hoses. Because of the vinyl regs, we have to perform regular dosimeter monitoring on individuals. Off loading VCM is the one place where a dosimeter sometimes records an exposure of greater than 1 ppm which is the 8 hr time weighted average PEL. I know on all of these reports that I've seen, it was reported that the employee was using breathing air.
Brandon

>>> JIM DEMAND 05/23/03 11:56AM >>>

Do you utilize breathing air for routine unloading of VCM? That is how it is done in OKC, but, the VCM plants do not use BA when loading the material.
Jim

GGC000279

From: JIMMY AUTREY
To: daily report
Date: 6/3/03 5:41AM
Subject: Mx - 6/2/03

There were 2 CI in Vinyl:
Unplug Rx741 pt
GGC complete (MCS)
Rpr lites in EM
GGC complete (CWH)

There were 5 Es written in Vinyl yesterday:
Rpl #8 Bird belts
Unplug FBD plugflow plate dp
Rpr s WM rvcn rcvr piping leak
Rpr Rx747 cw jkt vlv
Rpr #4 activator level

There were 3 Es in Cmpd:
Rpr L1 Clyde xfr pot
Inspect L1 Hx cooler oil leak
Rpr L2 Sterico

You are remembered for the rules you break.
Douglas MacArthur

GGC000280

From: LON BRADLEY (ALONZO BRADLEY)
To: LAB SIT
Date: 6/5/03 10:28AM
Subject: CRITICAL ITEM # 1

6/05/03

A soap test was performed on the five vinyl standard cylinders in the PVC lab analytical room and two leak sources were found. One was at the regulator of one cylinder and the other at a needle- valve located under the hood. The proximity of the cylinders to the hood could possibly limit exposure to the suspected carcinogen, however periodically the hood is shut down for various reasons. Several safety precautions come to mind to help prevent exposure.

Obviously the valves on the bottles could be blocked-in, thereby eliminating the leaks at the regulator and needle valves (problem with this is analysts frequently forget to open the valve when preparing standards and to close them upon completion). The regulators and needle valves could be periodically inspected and maintenance performed if necessary (possibly we could recommend a schedule). Upon cylinder change-out, use of Teflon tape and a leak test could be performed as routine procedure. A leak detection system could be established, or possibly the bottles could be located under the hood.

Just wanted to up-date you and get you looking for potential occurrences of this nature in other labs as they may also be affected and get you thinking safety. Look forward to your input for this critical item we are to address in our upcoming meeting tentatively scheduled for July 1. Keep in touch guys (you too Bonnie) ;).

Sincerely , Lon

GGC000281

From: JIMMY AUTREY
To: daily report
Date: 6/6/03 5:42AM
Subject: Mx - 6/5/03

There were 4 Es written in Vinyl yesterday:

Rpr HM chunk catcher leak
Rpr Rx600 steam stripping vlv lites
Rpr 691 silo xfr line leak
Rpr 688 silo xfr line leak

There were 2 Es in Cmpd/Pz:

Rpr dribble tank recorder
Rpr L1 mb station vent fan

There was 1 E in the Yard:

Rpr resin unloading system vac blwr

Don't do things to not die, do things to enjoy living. The by-product may be not dying.
Bernie S. Siegel, M.D.

GGC000282

From: NEEDHAM V. STAHL
To: Vinyl Op. / Maint.; Vinyl Shift Supervisors
Date: 6/9/03 1:58PM
Subject: Leak Detection and Elimination Sheet Guidelines

I am trying to address some issues that we have seen with the Leak Detection and Elimination Sheet. I made a couple of changes. See Attached. The main thing is to get the sheets completed.

CC: Honeycutt, Larry D.; Knittig, Doug

GGC000283

From: "perry.keel" <pkeel@fluid-eng.com>
To: <hegwoodj@ggc.com>
Date: 6/9/03 5:58PM
Subject: torit collector efficiency

The answer to your question is not simple.
Or, the simple answer to your question is "0 emissions".

The cartridges in the collector are designed for 99.999% efficiency at 0.5 micron particles.
Maximum loading to the collector is 2 grains/scfm.
But your smallest particle from the "HELOS Particle Size Analysis" is larger than 21.50 microns.

As long as the collector runs within the design parameters, with this dust, and proper maintenance, the emissions are 0.

Is this answer acceptable?

Perry

GGC000284

Needs/Priorities by Site

June 9, 2003

Aberdeen

Safety Statistics:	1 st Aid	Medical Treatment	RWD/DAFW
2003 (YTD)	2	0	0
2002	7	0	1
2001	6	4	2

Recent Events:

*	3/12/03	Finger laceration	First Aid
*	1/18/03	Finger laceration	First Aid
*	11/6/02	Back strain	Restricted Work
*	8/7/02	Back pain	First Aid

Environmental Statistics

2003

2/5/03 Exceeded daily BOD maximum concentration (ppm) and maximum loading (pounds)(YTD)

1/29/03 Exceeded daily BOD maximum concentration (ppm) and maximum loading (pounds)(Both of these are a once per week grab sample due to a single event)

1/20/03 Vinyl release in excess of reportable quantity (56 lbs)

2002 No reportable environmental emissions

2001 No reportable environmental emissions

Environmental, Health & Safety

- PVC Lawsuit - Firm onsite gathering information
- Former Ground Water Contamination- DEQ Compliance Plan - Progressing
- New safety manager - Michael Carter - re-align duties. Doug Knittig - Add shipping.
- Apollo RCA training for personnel at site. - fall
- Employee based safety involvement effort - Mid Year kick-off.

Quality/Production / Resource Needs

- Wet Resin - 10 complaints in 2003. (Winter problem)
- Incremental Production Increases - (2003 - 2 projects)
- Corporate Maintenance Management team - BN Management representative.
- Standardized Quality Analysis - methods (Gel Test, IV, Color) - Gel Test - using old and new method?
- Compound plant - 2 rigid lines to 1 rigid & 1 flexible.
- ISO - Conversion to new 2000 standard.
- Cost Allocation - Defining compound allocations to reflect stand-a-lone plant.

Communication / Community Needs

- Aberdeen site 40th anniversary in 2003

I N T E R

Georgia Gulf

O F F I C E

To: Vinyl Supervisors
From: Needham Stahl
Date: June 9, 2003
Subject: **Guidelines for Leak Detection and Elimination Sheet**

Document each reading when the alarm is received, the alarm sounds at 5 ppm. If there is a leak and it continues while trying to locate, document once but include all high readings. We have experienced a few problems with this sheet but the biggest problem is that we are not following up and completing the forms. Here are some revised guidelines to follow:

- 1) Have operators (Yard or Vinyl) find readings when receiving alarm.
- 2) Document each alarmed reading (5 PPM and over).
 - A) Fill out date and time in first column.
 - B) Stay consistent with leak numbering in second column.
 - C) Fill out GC stream number (same as on DCS).
 - D) Fill out GC readings (same as on DCS).
- 3) Fill out leak location (Actual leak location).
 - A) Insert contacted person's (field operator) name in this slot.
 - B) If no leak can be found, the field operator's name (not initials) goes into this block with the comment.
- 4) Fill out HNU readings (sixth column).
- 5) Fill out the "Was Notification Written" column (Yes or No). If "Yes", fill-in Notification

number.

- 6) "What Repairs Were Made" column.
 - A) This is a repair to fix the problem (mechanical or operational).
 - B) Notified yard and closing valves are unexcitable.
 - C) Do not refer to other leaks, they are already suppose to be repaired. If it is the same location, write a new notification.
- 7) The "Repaired Date:", "Repaired By:", and "Repair Verified By:" columns are for the person(s) that checks the equipment repair and puts it back into service.
- 8) Put a copy of each sheet in the Morning Report and give all completed sheets into the Environmental Manager's mail box.

From: Doug Knittig
To: SARGENT, SHEA P
Date: 6/10/03 10:24AM
Subject: Re: STEL Testing at the Tankfarm

I am now responsible for the Yard, Lab and Resin. I was just wanting to get up to speed. Curiosity and learning mostly.

>>> SHEA P SARGENT 06/10/03 10:22AM >>>

There should be some data in IHS. Bill should be able to fetch some of that for you. I will say that I don't think any STEL have been collecting in about a year or so. I believe I lessened the frequency since, from the results, it was evident that respirators would be necessary. There will be maybe 20 samples in the last 5 yrs. Plus, a lot of HNU data collected (which is probably the most extensive; it was looking at leaking valves on tank cars) by Uptain before I arrived on scene. All showing that VCM exposures occur with loads of variation.

Just out of curiosity....what is this in regards to???

>>> Doug Knittig 06/10/03 09:20AM >>>
VCM tankfarm unloading.

>>> SHEA P SARGENT 06/10/03 09:17AM >>>

When you say tank farm....what exactly do you mean? Plasticizer tank farm? VCM rail car unloading area? And testing for what chemical?

>>> Doug Knittig 06/10/03 08:54AM >>>

Do we have any recent numbers for Aberdeen? What is our testing protocol? Do we have a testing protocol?

GGC000288

From: JIMMY AUTREY
To: daily report
Date: 6/11/03 5:49AM
Subject: Mx - 6/10/03

There were 4 Es written in Vinyl:
Rpr #7 dryer nw trunnion roller
Rpr 282 silo xfr line leak
Rpr B vac pump ringseal water vlv
Rpr 679 silo switch

Bigamy is having one husband too many. Monogamy is the same.
Erica Jong

GGC000289

From: NEEDHAM V. STAHL
To: Vinyl Op. / Maint.; Vinyl Shift Supervisors
Date: 6/12/03 7:10AM
Subject: Updated Leak Detection Guidelines

It has been brought to my attention that I had a couple of incorrect terms in the previous memo. The attached addresses these comments.

CC: Honeycutt, Larry D.; Knittig, Doug

GGC000290

I N T E R

Georgia Gulf

O F F I C E

To: Vinyl Supervisors
From: Needham Stahl
Date: June 12, 2003
Subject: **Guidelines for Leak Detection and Elimination Sheet**

Document each reading when the alarm is received, the alarm sounds at 5 ppm. If there is a leak and it continues while trying to locate, document once but include all high readings. We have experienced a few problems with this sheet but the biggest problem is that we are not following up and completing the forms. Here are some revised guidelines to follow:

- 1) Have operators (Yard or Vinyl) find readings when receiving alarm.
- 2) Document each alarmed reading (5 PPM and over).
 - A) Fill out date and time in first column.
 - B) Stay consistent with leak numbering in second column.
 - C) Fill out GC stream numbers (same as on DCS).
 - D) Fill out GC readings (same as on DCS).
- 3) Fill out leak location (Actual leak location).
 - A) Insert contacted person's (field operator) name in this slot.
 - B) If no leak can be found, the field operator's name (not initials) goes into this block with the comment.
- 4) Fill out HNU readings (sixth column).
- 5) Fill out the "Was Notification Written" column (Yes or No). If "Yes", fill-in Notification

Number.

- 6) "What Repairs Were Made" column.
 - A) This is a repair to fix the problem (mechanical or operational).
 - B) Notified yard and closing valves are unacceptable.
 - C) Do not refer to other leaks, they are already supposed to be repaired. If it is the same location, write a new notification.
- 7) The "Repaired Date:", "Repaired By:", and "Repair Verified By:" columns are for the person(s) that checks the equipment repair and puts it back into service.
- 8) Put a copy of each sheet in the Morning Report and give all completed sheets into the Environmental Manager's mail box.

From: BRUCE DEMPSEY
To: daily
Date: 6/14/03 3:54AM
Subject: MORNING REPORT

The PVC Unit had 1 safety or environmental opportunities yesterday.

The Unit produced 62 batches with a VCM take of 3.100 MM lbs.

Maintenance activity: 1. M/w's pulled south condensate pump on stripper 4 to rebuilt incomplete

There were 0 product changes yesterday.

TR-1_2079_____

PSD: Went fine @ 22:30 made a 2.3 % cut on disp. waiting on analysis

DR-2: 14 hrs. prime, 8 hrs. int. elevated contam. 2 hrs. down boilout

DR-6: 16 hrs. prime, 8 hrs. int.

Charged 14 batches---missed 4 for stripper boilout dryer contam. out of spec

TR-2_2066_____

PSD: Had three reactors out of spec on the fine side, made a 3% cut

DR-1: 12 hrs. prime, 10 hrs. down boilout, 2 hrs. off spec startup

DR-3: 10 hrs. prime, 6 hrs. down washed dryer and boilout, 8 hrs. off spec high cont. and startup

Charged 12 batches----missed 6 reactors 4 for boilout, 1 for water overcharge aborted, 1 to run aborted batch out

TR-3_2095_____

PSD: On the fine side made a 7.1 % cut on disp. waiting on analysis

DR-4: 6 hrs. down running kill batches, 12 hrs. prime, 6 hrs. off spec psd out and startup

DR-5: 4 hrs. down kill batches, 12 hrs. prime, 8 hrs. off spec psd out and startup

Charged 18 batches ----0 misses

TR-4_2095_____

PSD: On the fine side made a 7.1% cut on disp. waiting on ana.

DR-7: 12 hrs. off spec psd out, 12 hrs. prime

DR-8: 4 hrs. down not needed, 10 hrs. off spec high contam. and psd out 10 hrs. prime

Charged 18 batches ----0 misses

PVC Water Reuse System

High Lamella feed in: 3086.2 T.S.S. PPM.

High Lamella feed out: 56.0 T.S.S. PPM.

GGC000293

From: JOE BEALL
To: AUTREYJ, , CALDWELLW, , HOLLIVAYC, , MorganE, , NolenD, , WilsonW, ,
HOLLIVAYC,
Date: 6/15/03 8:27PM
Subject: Re: JSC committee

If you are alleging a contract violation by the company then I must totally disagree. This is a joint committee and to my knowledge the company made several attempts to meet during the past year and either no one from the union could meet or there was no interest. We have been without a safety manager for some time and the safety department and its initiatives have been recently assigned to Michael Carter. As we have in the past, we are willing to meet as a JSC and it is our intent to meet the conditions of our labor agreement. I fail to find any contract violation by the company in this matter.

Joe Beall

<<< CAROLYN D. HOLLIVAY >>>

The collective bargaining agreement Article XX, Section 2 between GGC & Vinyls, LLC. and Local Union 15198 is currently in violation for Safety and Health regulations.

The Joint Safety Committee last official meeting was June 19, 2001. The Local 15198 representatives are: Erskin Morgan, Union Representative (Yard)
Carolyn Hollivay, Union Coordinator (Lab)

Safety is an important issue. It only takes 1 hour per month to save someone's life. It takes one split second to lose your life. Take a minute, Let's get back on track.

Thanks in advance,
Carolyn Hollivay
Safety Union Coordinator

CC: CarterM, , NADLERB,

GGC000294

From: JOE BEALL
To: HOLLIVAY, CAROLYN D.
Date: 6/16/03 6:38AM
Subject: Re: JSC committee

I believe David Nolan has talked with Michael about a meeting schedule. Feel free to call him, he and I have talked and he's we'll aware of our contract obligations. thanks for the help. Joe

>>> CAROLYN D. HOLLIVAY 06/16/03 06:39AM >>>

Joe,

This is an attempt to get the JSC back on track. I attended every JSC meeting, (even on off days), type up some of the minutes for the meetings, and checked with Chris for meeting times and dates..

Chris came up with the idea to set up the JSC as a SIT based on the fact , he would be out of the plant 50% of the time. The previous attachments were in regards to the discussions we were having in the meetings. He wanted me to help coordinator the SIT.

I also talked to Bill Caldwell on several occasions about the JSC. He expressed interest as well.

Can we schedule a meeting for this month?

Thanks
Carolyn

>>> JOE BEALL 06/15/03 09:27PM >>>

If you are alleging a contract violation by the company then I must totally disagree. This is a joint committee and to my knowledge the company made several attempts to meet during the past year and either no one from the union could meet or there was no interst. We have been without a safety manger for some time and the safety department and it's iniatives have been recently assigned to Michael Carter. As we have in the past, we are willing to meet as a JSC and it is our intent to meet the conditions of our labor agreement. I fail to find any contract violation by the company in this matter.

Joe Beall

<<< CAROLYN D. HOLLIVAY >>>

The collective bargaining agreement Article XX, Section 2 between GGC & Vinyls, LLC. and Local Union 15198 is currently in violation for Safety and Health regulations.

The Joint Safety Committee last official meeting was June 19, 2001. The Local 15198 representatives are: Erskin Morgan, Union Representative (Yard)
Carolyn Hollivay, Union Coordinator (Lab)

Safety is an important issue. It only takes 1 hour per month to save someone's life. It takes one split second to lose your life. Take a minute, Let's get back on track.

Thanks in advance,
Carolyn Hollivay
Safety Union Coordinator

GGC000295

From: DANNY CEDOTAL
To: MORNREP
Date: 6/16/03 6:40AM
Subject: Fwd: PLAQ PVC MORNING REPORT - 6/13/03

There was an environmental incident on Friday when resin was released from the PSV of SILO #9. This silo became full when indicating less than full weight. Some resin was released off-site. The environmental department was notified shortly after this occurred.

Train 1 & Train 2 both had stripper boilouts due to contamination.

GGC000296

NEEDHAM V. STAHL
Mackay, Reed; Smith, Erik E.; Vinyl Op. / Maint.; Vinyl Shift Supervisors
6/18/03 12:37PM
VCM Release Action Item

I had an action item from the 1-20-03 VCM release. There is a packet in one of the supervisor boxes for permit writers and engineers to read and sign off on. Work through this in a timely manner.

Thanks

Knittig, Doug

GGC000297

From: "Jon Schwerman" <jschwerman@asse.org>
To: <markersonc@ggc.com>
Date: 6/19/03 5:36PM
Subject: The Latest in EH&S from ASSE

Latest and Greatest in EH&S from ASSE Headquarters...

**** ---- **** ----

Confined spaces continues to be a significant exposure/hazard that all of us address on a continual basis. As you hopefully are already aware, the significantly revised ANSI/ASSE Z117.1-2003 Standard - Safety Requirements for Confined Spaces has been published and is now available! And, we tried something new on 4/29/03 by hosting a technical conference call for interested parties. We had in excess of 460 attendees join us to learn about the key differences between the 1995 and 2003 standards.

We have captured the audio presentation on CD, and it is available along with the standard itself. The scope of the Z117.1 Standard provides minimum safety requirements to be followed while entering, exiting and working in confined spaces at normal atmospheric pressure.
For details and purchase info, visit <http://www.asse.org/fr3384.htm>

Or, give our Customer Service Department a call at 847/699-2929. Finally, the call seemed to go very well, and we will have similar events in the future.

**** ---- **** ----

Going Beyond Your CSP, CIH or MBA?

As an experienced professional with years of knowledge and a variety of valuable skills, how do you take that next step?

-- Why should you be eager to learn how to determine the effectiveness of your safety program?
-- And, why should you be seeking new methods to better manage the business aspects of your operation?

Like many SH&E professionals, you aspire to a higher level of achievement -- THAT Next Step. This level of education is only available through ASSE's new Executive Program in Safety Management series. Join other experienced safety professionals at the next program, being offered: July 14-15, 2003 in Oak Brook, IL.

Details at <http://www.asse.org/expro03.htm>

**** ---- **** ----

Coulda, Woulda, Shoulda!

Mistakes happen - like not attending ASSE's Human Error in Occupational Safety Symposium. But now you have a second chance. ASSE is offering a unique audio collection and proceedings package that brings you the knowledge and practical guidance you missed.

You'll become a more effective SH&E manager by gaining new insights into the causes of human error, learning about practical applications to reduce losses, and examining the successes and failures in other industries.

Details and more at <http://www.asse.org/fr4396.htm>

Questions or comments, please contact customer service at 847-699-2929.

GGC000298

From: Doug Knittig
To: Honeycutt, Larry D.; STAHL, NEEDHAM V.
Date: 6/24/03 2:53PM
Subject: Fwd: Leak Detection Charts

NM Strainer and the VCM Tankfarm. Let's see if we can improve in these areas. Let me know what you plan to do to improve.

Thanks,Doug

GGC000301

From: NATE JOHNSON
To: Knittig, Doug
Date: 6/24/03 2:30PM
Subject: Leak Detection Charts

The attached file contains the leak detection information you requested. If there are any problems or questions just let me know.

Nate Johnson

GGC000302

From: Doug Knittig
To: CALDWELL, WILLIAM (BILL); Carter, Michael L.
Date: 6/24/03 8:29AM
Subject: Action Items from Safety Audit

One item appears to be closed. Osha 200 to Osha 300. This on PSM-007-F002.

Who made this change? Completed on 4/23/03.

GGC000303

From: NEEDHAM V. STAHL
To: Vinyl Op. / Maint.; Vinyl Shift Supervisors
Date: 6/25/03 8:37AM
Subject: Leak Detection and Eliminations Data Results

The Co-ops pulled data concerning VCM reading from all the GCs from January through the 4th of June. The attached are the finding. As you will notice we have one of the top ten areas that consistantly appears. This is around the New Module Hi-Mo dump strainer, dump pump, and sweco area. These readings need to disappear. There may be valves in need of replacing or our operating procedures are in need of revisions or as a phlosiphor that I know says, the stars and moons may have to align for this to occur. What ever the cause is, we have to identify and correct the problem. There are a couple of other areas that did not make the top ten but are in need of attention so they won't. Any reading is too many. See attachments.

GGC000306

From: BRANDON NADLER
To: DEMAND, JIM
Date: 6/26/03 9:18AM
Subject: Re: Current Needs/ Status

Just a couple of minor changes - highlighted in bold, red text.

These are not noted on the sheet, but some other comments.

- There are 3 lawsuits:

1) Frye / VCM conspiracy

Frye never worked for GGC and is suing former owners claiming conspiracy to conceal health effects of VCM exposure in the same vein of the tobacco law suit. (GGC is not named)

2) Spann Cancer / VCM conspiracy (GGC is not named)

Spann is an existing employee alleging VCM exposure under former owners (GGC is not named). Spann has been diagnosed with cancer.

3) Strong / class action. Strong is a neighbor claiming exposure from PVC dust. This lawsuit was filed on December 31 to get in before tort reform. The suit starts out claiming white dust and then changes to claims of groundwater contamination from our creosote operation. This suit is obviously a copy of the Kerr McGee suit in Columbus with the names changed.

Wet Resin - we are implementing dryer related improvements to address wet resin. We have identified dryer conditions that result in wet resin, primarily overload in the dryer. We are implementing controls in the DCS to prevent overloading the dryers. Second, the fluid bed dryer upgrade (AFE) will help here. Third, we've had ABB to help investigate Advanced Process Control ideas that may further improve operational reliability in the stripper - centrifuge - dryer train.

Incremental production - there is one more cooling project. Last winter we installed larger cooling water piping on Rx 741 and held off on Rx 742 through 745 until we determined if the increased flow to 741 offered the improvement that we hoped for. Since we've just recently seen hot weather (90+ degrees) we now know that increasing cooling to these reactors will give us additional capacity. We hope to have an AFE approved to implement this winter and have available for operation next summer.

Brandon

>>> JIM DEMAND 06/25/03 12:48PM >>>

Attached is a brief summary of current needs / status items that I put together to review with Charlie & Ed. Ed will be here next week and would like to review. Would you look over and add/delete and modify to reflect current needs. Would like to get back as soon as practical.

Jim

GGC000307

From: SHEA P SARGENT
To: Carter, Michael L.; NADLER, BRANDON
Date: 6/26/03 1:22PM
Subject: Data on Hepatic Angiosarcoma

FYI

<http://www.cx.unibe.ch/ikp/lab7/ANGIOSARCOMA.html>

.pdfs attached.

GGC000308