

**Georgia Gulf Chemicals & Vinyls, LLC
Aberdeen Plant
Emergency Response Plan**

Subject: **Release of Flammable Gas**

Code: ERP X

Revision 3

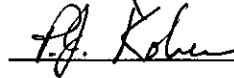
Effective: January 1, 2000

Approved By:



Safety & Health Manager

Approved By:



Plant Manager

**X. RELEASE OF FLAMMABLE GAS -
(VCM/PROPANE/NATURAL GAS)**

An emergency condition exists whenever there is an uncontrolled release of flammable gas such as a rupture of a process line or the uncontrolled venting through a relief device. Releases of flammable gas in the Aberdeen Plant are most likely to involve VCM (VCM tank farm, unloading rack, Old and New Reactor Modules), propane (propane tank farm and boiler house), or natural gas (boiler house). Such emergencies could expand to include other areas of the plant depending on the extent of the release and the weather conditions. Critically important steps to be taken when an uncontrolled release of flammable gas occurs are shelter in place/evacuation of personnel, notification of the Aberdeen Fire Department, and call-out of the ERT and the Management Staff, the prevention of further release, and the control of possible sources of ignition. Each release of flammable gases can present a different situation, so judgments will have to be made in each case. However, most releases can best be handled in the manner described below:

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In addition to the actions as noted in the General Response Procedures:

- A. Activate the deluge system in the affected area and downwind area.
- B. Using extension 2200 phone, the Lead Operator shall contact the Aberdeen Police and Fire Departments via the 911 system and give a brief description of the emergency. At this time, a Yard Operator shall be at the gate to escort the Fire Department into the plant as needed. If the release poses a threat to the community, municipal authorities shall begin proper notification of the area affected by the release. The police department will block off Highway 25 at Thayer Avenue and Matubba Streets.
- C. Control - The following steps will be taken to control the situation:
 - 1. Shut down all ignition sources or potential ignition sources including dryer and incinerator gas burners, inert gas generator, building heaters, etc., as appropriate.
 - 2. Boiler house operation is to be shut down in cases where unfavorable wind conditions exist and a flammable material release may be great enough to present a hazard.
 - 3. In the event of a release where the Vinyl Unit dryers are shut down, the Compound Unit shall also shut down. In this instance, the alarm shall be sounded again with a long continuous tone.

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****** In cases where communications to shut down boilers are not received and conditions warrant such actions, the Utility Technician, using good judgment will make the decision to shut down. This action shall be communicated to the EOC, if at all possible.

4. Close all isolation valves necessary to prevent further release.

D. Gas Concentration Monitoring

Monitoring to determine gas concentrations may be required in the event of a release; this is particularly a concern if VCM has been released. The Environmental Manager will determine when monitoring is required and will be assisted by selected process engineers. Monitoring equipment FIDs, HNUs, or colorimetric tubes can be obtained from the Environmental Manager, Safety Department, or the Vinyl control room.

E. Re-Entry Into Affected Area

Re-entry into an affected area will be permitted only after the area has been secured and cleared. When the affected area is secured and cleared, the Incident Commander will contact the control room to activate the "ALL CLEAR" signal.

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1. Medical Surveillance - Any employee suspected of being exposed to concentrations of VCM will be provided with appropriate medical surveillance.
2. Reports of Release - VCM releases shall be appropriately reported as per the Environmental Manual.

In addition, within twenty-four hours of an emergency caused by a "massive" release of VCM, the Safety Manager or Plant Manager will report the emergency to the OSHA Area Director.

3. To trigger the 24-hour notification, the following two conditions must be met:
 - A) An unforeseeable massive release of VCM.
 - B) Actual exposure to employees. OSHA evaluates exposures without regard to the use of respiratory protection.

For additional guidance on the reporting determination, refer to HDG 8/27/96 memo, which clarifies the emergency reporting re-quirements.

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