

Interoffice
Communication

TO: Virgil Weiss-Austin

TGG: JCL: ERT: MJH: AJO: RF

XF: 5

FROM: T. G. Grumbles

DATE: October 16, 1990

SUBJ: R&D CTIRP COORDINATOR DESIGNATION

VISTA

Vista has a uniform procedure for responding to transportation incidents involving Vista Chemical Company products. The procedure includes a notification process, and specific contacts for each shipping location. I've attached copies of a portion of the CTIRP manual. In the past, R&D has not been included in this procedure.

However, the CTIRP Management Committee believes that R&D needs to designate a contact at this time and become a part of the CTIRP process.

This is a result of the increasing new product development work and the potential for larger volume shipments to be made from the R&D pilot operations.

Response responsibilities include advice to local responders for the most part, but for larger volumes, shipments may require on site response or administrating the use of an approved response contractor through CHEMNET.

Please let me know who you will designate as R&D's CTIRP coordinator by November 2. At that time, we can work with the contact to further define their responsibilities.


T. G. Grumbles

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cc: CTIRP MANAGEMENT COMMITTEE

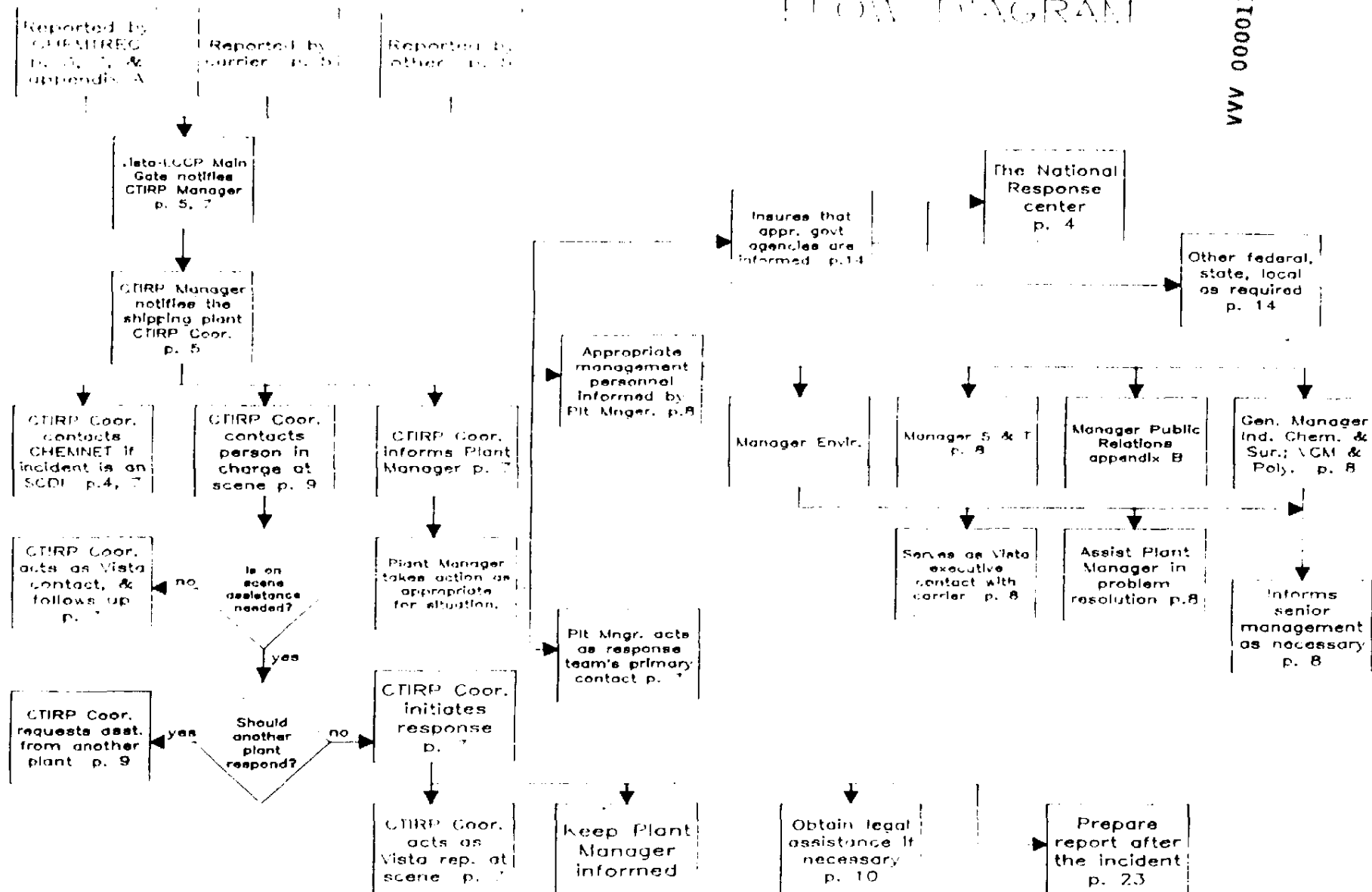
T. H. Huffman, Keith Fogg-LCCP, Paul Gowan, W. L. McClain, M. S. Reynolds

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CTIRP INCIDENT FLOW DIAGRAM

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INCIDENT IS REPORTED TO VISTA



INTRODUCTION

GENERAL

Vista Chemical Company is committed to distributing its products without threat to employees, the general public, or the environment and without product loss. In addition, the Company seeks to comply with all state and federal regulatory requirements concerning transportation incidents. While the Company strives for safe distribution, the CHEMICAL TRANSPORTATION INCIDENT RESPONSE PLAN (CTIRP) has been prepared to deal with transportation incidents should they occur. Employees likely to become involved in a transportation incident or response should be familiar with the procedures established in this plan.

When a transportation incident occurs, Vista's primary goal is to provide timely response as required to control and eliminate the emergency situation. When an incident involves a common carrier, and appears to result from the failure of the carrier to satisfy its responsibilities as carrier (i.e., derailments, collisions, etc.), Vista will function in an "advise/assist" capacity. If a carrier cannot or will not assume responsibility for handling a transportation incident which involves a carrier responsibility, and action is required, Vista personnel will take a more active role.

When Vista is the carrier (i.e., Vista-owned trucks) or when the incident involves or results from a Vista responsibility (i.e., maintenance-related problems, container integrity problems which should have been addressed prior to shipment, etc.) Vista will assume a more primary and active role in responding to the incident.

PURPOSE

This document has been developed to fulfill the following purpose:

1. To establish a uniform procedure for responding to transportation incidents involving Vista Chemical Company products, both regulated and non-regulated.
2. To establish communication procedures and responsibilities to ensure proper notification of company management of all transportation incidents.
3. To document regulatory requirements concerning chemical transportation incidents and assign responsibility for fulfilling those requirements.

SCOPE

A transportation incident is defined as a spill, leak, fire, release, personnel exposure, injury, equipment failure, or accident involving a Vista Chemical product, waste, or piece of equipment while in transit between the manufacturing point and the user.

Examples of transportation incidents may include, but are not limited to:

- Railcar Derailments
- Transport Truck Accidents
- Failure of Container Safety Devices
- Situations Involving Loading Defects (i.e. leaking gaskets on dome lids)
- Customer Problems of a Safety Nature Relating to Shipping Containers

Pipelines are considered outside the scope of this plan.

Delivery delays are not considered transportation emergencies.

Product releases at a Vista Chemical manufacturing plant requires emergency action, but is not considered within the scope of this plan. In-plant emergency procedures are covered in each plant's emergency plan, and Vista Chemical Company's Emergency Communication Plan.

Each plant will develop its own written transportation incident procedures and include details specific to that plant and its products.

The Vista Transportation Department Operations and Safety Manual, Transport Operations, includes transportation emergency procedures addressing motor carrier requirements. A synopsis of that plan is included in Section I.X.

Product terminals other than plant locations and all processors are not part of this procedure and are handled under a separate procedure.

SECTION 1

CTIRP PROCEDURES

I. OBJECTIVES

There are three primary objectives to be met in handling all chemical transportation incidents. These objectives, in order of priority, include:

- Prevent injuries, threats to the environment, and property damage.
- Clear obstructions so traffic on highways, railways, and waterways may resume safely.
- Safely salvage or contain the product(s) involved in the incident and, if necessary, ensure safe disposal.

II. CMA EMERGENCY PROGRAMS

A. CHEMTREC

To speed handling of transportation incidents, Vista Chemical Company cooperates with the Chemical Transportation Emergency Center (CHEMTREC). A public service hotline operated by the Chemical Manufacturer Association (CMA) in Washington, D.C., CHEMTREC operates 24 hours a day, seven days a week to maintain a nationwide system of chemical emergency assistance.

CHEMTREC telephone numbers are included on all Vista Chemical Bills of Lading as a reference for carriers in the event of an incident.

CHEMTREC operates in two stages. First, upon receipt of information regarding the name of a chemical, it provides carriers or anyone at an incident site with immediate advice on the nature of the product. Second, CHEMTREC promptly contacts and informs the shipper.

Once notified by CHEMTREC, the shipper is responsible for contacting the carrier or regulatory agency to determine if advice or assistance is required.

To provide the information needed by emergency service personnel, CHEMTREC maintains extensive files on over 90,000 chemicals or trade name products. This information is constantly updated to reflect the most accurate information about the chemical. CHEMTREC maintains a file of Vista product Material Safety Data Sheets (MSDS).

The Manager of Environmental Quality is responsible for ensuring CHEMTREC is provided current data on all Vista manufactured products.

The Bill of Lading provided with each shipment instructs the carrier to call the CHEMTREC emergency number in case of transportation

incidents. Since CHEMTREC plays a vital role in the Vista CTIRP, the Manager Supply and Transportation will ensure a letter is sent to each carrier, on an annual basis, informing them to call CHEMTREC when there is an incident. This letter should be sent to all carriers - rail, truck, and air.

(For special CHEMTREC Services, see Appendix A)

8. CHEMNET

CHEMNET is a voluntary mutual aid network of chemical shippers that operates in conjunction with CHEMTREC. Like CHEMTREC, it functions as a public service of the Chemical Manufacturers Association. CHEMNET is organized to provide technical expertise and assistance at the scene of a serious chemical distribution incident when the shipper cannot respond promptly.

Vista participates in CHEMNET as a "subscriber" which means other shipper representatives or "for hire contractors" may respond to our emergency incidents until Vista personnel can get to the site. Vista does not furnish response personnel for other shipper's incidents. "For hire contractors" responding to CHEMNET incidents are under contract to CMA. CHEMNET keeps up-to-date lists of "for hire contractors" and can be contacted for that list.

A CHEMNET response is activated when in the judgement of the shipper, a serious chemical distribution incident has occurred. The basis of this determination is:

- Incident presents a significant possibility of causing injury to persons at or near the scene.
- Incident presents a significant possibility of causing serious damage to the environment.
- Incident involves a chemical which if mishandled during first response, is capable of causing such injury or damage.

If the shipper finds that he is unable to respond promptly, CHEMNET is activated through CMA by the shipper. Nearby responders or "for hire contractors" may be sent to the scene. The shipper may advise CMA as to which responders or contractors should or should not be activated.

The shipper is obligated to relieve any responder he has requested at the scene as soon as possible and in any event, within 24 hours. If that cannot be done, the shipper will engage "for hire" emergency response personnel or make special arrangements with the responders to have them stay at the scene beyond the 24 hour period.

Communications between any responder and the shipper must be established early. The shipper must be available by phone to the responder for the purpose of giving advice on the properties of the

chemical involved or other assistance that the responder may require. Use of responders or "for hire contractors" does not relieve the shipper of any requirements to report the incident to governmental authorities, nor reduce the importance of the shipper being available to communicate with such governmental authorities, the media, and the public.

When a Vista shipment is involved in a transportation incident, the local CTIRP Coordinator, the Plant Manager, and the CTIRP Manager determine if the event is classified as a "serious chemical transportation incident." That determination will be made on information from the carrier, "on scene" emergency service personnel, and CHEMTREC. Information from others including public authorities who can provide factual details of the severity of the incident should be considered. The local plant CTIRP Coordinator will notify CMA's CHEMTREC if a "serious chemical transportation incident" has been determined to exist.

If the incident demands on-site technical assistance prior to the time that Vista personnel can reach the scene, the CHEMNET response plan is activated by contacting CHEMTREC. Once contacted, CHEMNET will handle notification to responders and "for hire contractors". At the time CHEMNET is contacted, specific names and telephone numbers of Vista personnel who will maintain communication with the responders must be given.

For more information about CHEMTREC, see Appendix A.

III. NOTIFICATION PROCEDURE

To activate the Vista response to a transportation incident, and to ensure all concerned parties are properly informed, the following notification procedure has been established. This procedure is displayed in Figure 1-1 (Notification Flow Chart).

The Lake Charles Chemical Plant Main Guard Gate (318-494-5142) serves as a 24 hour receiving center for all Vista transportation incident calls. A call to the Lake Charles Chemical Plant Main Guard Gate is imperative to trigger the proper Vista response to an incident.

Any Vista employee who receives a call concerning a chemical transportation incident should get the caller's name and number and tell the caller their call will be returned. Next, call the Lake Charles Chemical Plant Main Guard Gate, as shown in Step 1 of the following notification procedure.

When a shipping plant receives direct notification of a local incident directly from the carrier or public safety agency, the CTIRP Coordinator is authorized to respond to the incident without prior notification of the Lake Charles Chemical Plant Main Guard Gate. The incident should be reported to the CTIRP Manager as soon as possible.

CHEMTREC has been provided with the Lake Charles Chemical Plant Main Guard Gate number, and will call that number to relay information to Vista concerning transportation incidents. Company truck drivers have been informed to report incidents to their Terminal Manager, who will, in turn, call the LCCP Main Guard Gate.

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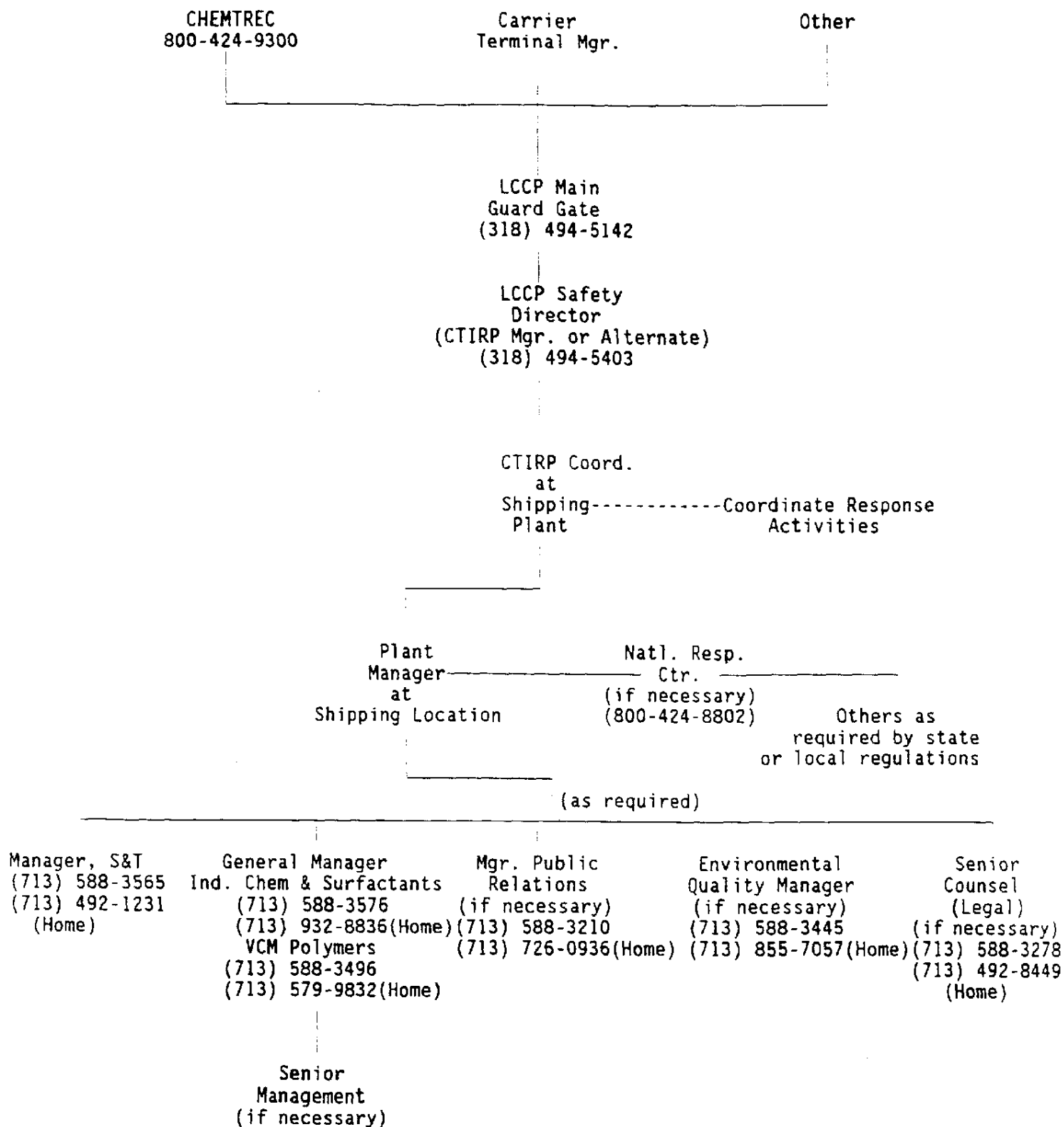


Figure 1-1
Notification Flowchart

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A. Action Steps

<u>Individual</u>	<u>Action</u>
1. CHEMTREC, CHEMNET, Terminal Manager, Other	A. All calls are referred to the Lake Charles Chemical Plant (LCCP) Main Guard Gate. (318) 494-5142
2. LCCP Guard	A. Receives and tape records emergency calls. B. Completes an Emergency Inci- dent Report. (see Figure 1-2). C. Relays information to the LCCP Safety Director (CTIRP Manager), or alternate, as shown on the LCCP CTIRP Call List for Lake Charles Chemical Plant (see Figure 1- 2).
3. CTIRP Manager or Alternate	A. Contacts the CTIRP Coordinator at the shipping plant to determine course of action.
4. CTIRP Coordinator	A. Contacts the person in charge at the incident site and gathers pertinent data concerning the incident (see Figure 1-3). Determine if a serious chemical distribution incident (SCDI) exists and contact CHEMNET if appropriate. B. Informs the shipping location Plant Manager. Contacts appropriate response team members if Vista presence is required. C. Acts as Vista person in charge at incident site when Vista presence is required.
5. Plant Manager (Shipping Location)	A. Serves as the primary contact for response teams at the shipping location when a response is in progress. Also is contact for CHEMNET responder if SCDI.

- B. Helps ensure that all regulatory agencies are notified as required.
- C. Notifies appropriate management personnel as required based on the needs of the incident.
- D. Notifies the Environmental Quality Manager when serious environmental damage is involved or the threat of such damage is significant.
- E. Notifies the Manager Public Relations when the incident is expected to become a news event (e.g. involves public injury(s), major property damage, community evacuations, has closed or diverted highway or other public transportation routes).

6. Manager Supply and Transportation

- A. Serves as the Vista executive contact to the carrier handling follow-up matters such as damage settlements, re-routing, etc. This does not preclude the CTIRP Coordinator from communicating with the carrier directly.
- B. Assists the Plant Manager in problem resolution when incidents are of a more serious nature. This may include arranging for contractors, procuring empty railcars, etc.

7. Appropriate Gen. Mgr., Manufacturing or Manager Supply and Transportation

- A. Contacts senior management and keeps them advised of the situation, as appropriate.

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VISTA CHEMICAL COMPANY

LAKE CHARLES CHEMICAL PLANT

EMERGENCY INCIDENT REPORT

CHEMTREC - POISON CONTROL CENTERS - CARRIERS - VISTA PERSONNEL

PERSON TO CONTACT ABOUT EMERGENCY

• NAME _____ TITLE _____
ORGANIZATION _____
LOCATION (city) _____ (state) _____
* PHONE NUMBER (AREA CODE) _____ (NUMBER) _____
ALTERNATE NUMBER _____

PRODUCT DETAILS

PRODUCT NAME INVOLVED _____
* ORIGIN OF SHIPMENT (LOCATION) _____
SHIPMENT DESTINATION _____
* CONTAINER IDENTIFICATION _____
CARRIER NAME _____

DESCRIPTION OF EMERGENCY _____

(LEAKING) (FIRE) (DERAILED) (SPILL) (INJURIES) (OTHER)

* IS THIS A POTENTIAL SERIOUS CHEMICAL DISTRIBUTION INCIDENT (YES) (NO)

GUARD ON DUTY _____ TIME _____ (am)(pm) DATE _____

NOTIFICATION (call in order listed) (check person contacted)

_____	1. Keith L. Fogg	5403	478-8156
_____	2. Brent N. White	5433	582-6495
_____	3. Mike Lunsford	5402	439-2351
_____	4. Dave E. Brown	5434	855-6953
_____	5. John Friend	5341	478-4952

OTHER PLANTS NOTIFIED NAME _____ TIME _____

CHEMTREC CALLED BACK TIME _____ CONTACT _____

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CHEMICAL TRANSPORTATION INCIDENT
INFORMATION CHECKLIST

1. What is the product involved?

2. Has the public been evacuated?
_____ Yes _____ No
3. What agencies are involved at this point?

4. Describe current action being taken by carrier.

5. Container leakage?
_____ Yes _____ No
- *5a. If yes, estimate of volume. _____ # or gal.
6. Product's compatibility with others nearby:

7. Container damaged or in danger of being damaged?
(i.e., fire or explosions nearby)
_____ Yes _____ No
8. Container's location in relation to:
 - a. People: _____

 - b. Adjacent activities: (plants, highways, other sources of ignition or potential exposure)

 - c. Streams, waterways, or sewers: _____

9. Weather conditions? Consider presence of:
 - Flooding, heavy rains or winds (can disperse product or carry concentrations to other areas)
 - Ground fog, mist, or rain (can mix with product)
 - Electrical storm (can ignite product)

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IV. VISTA RESPONSE

A. Incident Information

The CTIRP Coordinator at the original shipping location contacts the person at the incident site to obtain details on the incident. The initial response is determined by answering pertinent questions such as those on the sample checklist shown in Figure 1-3.

- * If needed, CHEMTREC can arrange conference telephone calls with several people involved in the incident to discuss situation or coordinate actions.

B. On-Site Presence

1. Plant Mutual Assistance

The various Vista CTIRP teams will provide mutual assistance to other Vista plant product incidents to the degree possible in handling transportation incidents. A plant CTIRP team should not hesitate to respond if the shipping plant response team can not arrive at the scene in a timely fashion.

2. Transportation

Transportation to the incident site will be dictated by the seriousness and location of the incident. Incidents within approximately 150 miles should be reached by ground transportation, however, special circumstances may require an alternate form of travel. The CTIRP Manager and Coordinators are authorized to schedule charter transportation as needed in order to properly respond. Each location should develop a list of these carriers along with their telephone list as part of their local plan.

3. Expenditures

The CTIRP Manager, Coordinators, and response team members are authorized to spend what is necessary to correct shipper responsibility items, to correct life threatening situations, or to prevent serious threats to the environment. This may be necessary if the carrier refuses or is reluctant to carry out its responsibilities. If the situation allows, the CTIRP Manager or Coordinator should consult with the Plant Manager nearest the incident site concerning hiring special services or equipment for the incident site.

4. Emergency Funds

Emergency funds may be established at the discretion of the local Plant Manager. Procedures should be established by the Plant Manager for safekeeping, accessing, and accounting for emergency funds.