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GOAL: All locations should develop the capability and a plan to begin modeling emergency release scenarios to develop an understanding of potential impact of such releases.

STATUS: We have done dispersion modeling of normal air emissions for the Aberdeen plant in the recent past. We have not done any modeling of emergency release scenarios. We plan to evaluate the dispersion modeling program for use in modeling emergency release scenarios. If the dispersion model we have is applicable we will model several plant worst case emergency release scenarios by June 30, 1993.

GOAL: All Company locations should complete development of a plant crisis management plan and test the program with a drill by the end of the second fiscal quarter.

STATUS: We have a written emergency response plan which is currently being revised. Revisions will be completed by March 1, 1993 and will include communications and recovery needs of the community. Another drill testing the new parts of the plan will be completed by June 1, 1992.

All new employees are trained in their responsibilities and six to eight drills are conducted each year. Drills include local city officials that are part of the Local Emergency Planning Committee - Fire Department, Ambulance and Police. We reevaluate our plan and make improvements based on items identified after each drill.

GOAL: All plants should develop and implement documented loading and unloading procedures for chemicals at company facilities that consider reduction of emissions and safety to personnel.

STATUS: We are currently completing two projects to upgrade and improve our VCM unloading facilities. Both of these projects are safety and environmentally based. These projects improve safety and minimize the chances of a significant release associated with unloading and storage of VCM at the plant. Operating procedures for unloading VCM have been updated to include new project changes and are now in review. Yard and Vinyl operator training on the changes and new equipment will start within the next month.

We also have written procedures in place for plasticizer loading. We will develop a list of all other required loading and unloading procedures and develop a schedule to for writing the procedures by March 31, 1992.

GOAL: Achieve an IA stage for code elements with a regulatory basis by the end of calendar year 1992. The elements included are listed below.

STATUS: CAER Code
Community Awareness item 3 is scored RI
Emergency Response item 2 is scored DP
Emergency Response item 3 is scored RI

Pollution Prevention Code
Element 2 is scored PP
Element 6 is scored RI
Element 7 is scored RI

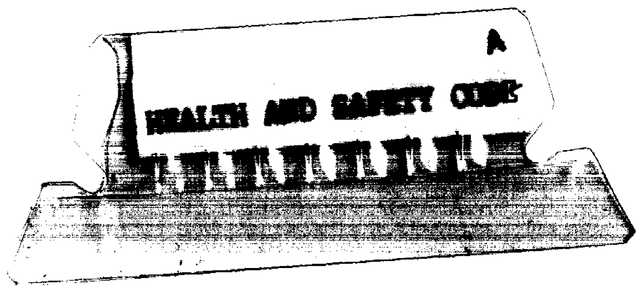
Distribution Code
Element 2.2 is scored EV
Element 4.1 is scored EV
Element 5.1 is scored RI

GOAL: All plants should review the training and communication requirements of all codes, determine site specific needs, and develop a plan to accomplish the training by end of FY93.

STATUS: Training needs is one of our plant goals and is part of OSHA process safety compliance. Aberdeen will do a training needs analysis for operations personnel by March 31, 1993. We will look at the results of the needs analysis and develop a plan to meet those needs by year end, June 30, 1993.

GOAL: Develop training and communication tools for implementation of the product stewardship code (Corporate Activity).

STATUS: N/A



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