

File

Manual"



Air Products and Chemicals
INC.

CALVERT CITY PLANT

INTEROFFICE MEMORANDUM

~~DJR~~
~~AFC last~~
~~STP~~

To: DISTRIBUTION

From: D. I. Hawes

Re: Vinyl Chloride
Release - Revised

Date: 4 February 1980

Copies: J. J. Baliker
L. G. Bland
R. W. Byars
~~A. F. Cantor~~
H. S. Carroll
D. W. Copeland
R. E. Davis
K. T. Diamond
J. J. Gray
R. L. Hall
B. D. Helms
D. R. Ivy
R. C. Lietzau
E. K. McIntyre
F. R. Saul
M. G. Seaton
R. D. Smith
C. W. Thomas

This revised procedure is to be followed by the safety officer on duty in the event of a vinyl chloride release into the atmosphere.

Procedure No. 1

If you are notified by another area company of a vinyl chloride release of which Air Products is responsible:

1. Record the calling party's name and company.
2. Record the information supplied by the caller, with no elaboration.
3. Note the time.
4. Note the wind direction and velocity.
5. Notify the PVC operating foreman by telephone or plant radio.
6. Call in the following order until you contact someone and inform that person of the situation

A. F. Cantor	443-9602	(Paducah)
K. T. Diamond	362-4023	(Gilbertsville)

AP00050787

R. L. Hall	395-4291	(Calvert City)
R. E. Davis	362-4421	(Gilbertsville)
R. C. Lietzau	443-9448	(Paducah)
J. J. Baliker	443-9945	(Paducah)

Procedure No. 2

If the vinyl chloride release is first detected by Air Products, the PVC operating foreman will call the safety officer and explain the situation. The safety officers will then:

1. Note the time.
2. Note the wind direction and velocity.
3. Call the following in order until someone is contacted and notify that person of the situation:

A. F. Cantor	443-9602	(Paducah)
K. T. Diamond	362-4023	(Gilbertsville)
R. L. Hall	395-4291	(Calvert City)
R. E. Davis	362-4421	(Gilbertsville)
R. C. Lietzau	443-9448	(Paducah)
J. J. Baliker	443-9945	(Paducah)

Procedure No. 3

You are notified of a vinyl chloride release that is suspected to have originated at B. F. Goodrich:

1. Contact the Air Products PVC operating foreman to ensure that the release is not from the Air Products plant.
2. Contact the B. F. Goodrich security officer of the situation by telephone (395-4151).
3. If you are unable to contact the B. F. Goodrich security officer by telephone, attempt to notify B. F. Goodrich by utilizing the CIMAP radio.
4. If contact with B. F. Goodrich cannot be established by telephone or CIMAP radio, attempt to notify one of the following B. F. Goodrich employees at their homes:

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R. V. Rommelman, VCM Supervisor
Home Phone 527-8956 (Benton)

J. R. Harper, Production Manager
Home Phone 554-9442 (Paducah)

After completing any of the procedures listed, call

B. D. Helms 395-4355 (Calvert City)

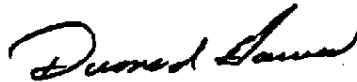
If unable to contact Helms, contact one of the following:

E. K. McIntyre 395-5581 (Calvert City)

D. I. Hawes 395-7547 (Calvert City)

F. R. Saul 362-8655 (Gilbertsville)

IN THE EVENT OF ANY VINYL CHLORIDE RELEASE, BE PREPARED TO RESPOND TO
A POSSIBLE EMERGENCY.



D. I. Hawes

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E. Tornado or Severe Thunderstorm Procedures

In the event of a tornado or severe thunderstorm WATCH, the safety officer on duty will tune in to the National Weather Service radio station that broadcasts local weather conditions 24 hours a day, 7 days a week. The safety officer will relay this information to the plant employees via the plant-wide radio frequency. Until such time as a tornado or severe thunderstorm warning is given, employees should maintain their normal routines, but watch for threatening weather. They should also listen to the plant frequency for further severe weather information.

A severe thunderstorm watch or tornado watch bulletin usually identifies an area about 140 miles wide by 200 miles long. The watch is only an indication of where and when the probabilities are highest. Watches are not warnings.

Since tornadoes are not always indicated by radar or observed by severe storm spotters, a warning may not always be given and persons should be on the alert for the possibility whenever threatening conditions are nearby.

In the event of a tornado or severe thunderstorm WARNING, the safety officer on duty will use the plant radio system to repeat the warning to plant employees. The safety officer will also request the Utilities operators to code the plant steam whistle to sound the code call 5-5 * 5-5 * 5-5. These soundings will be a warning for everyone to take cover indoors. No one should be outside unless caught in a remote area of the plant. In an office building go to an interior hallway on the lowest floor, or to the designated shelter area. Workers in production areas should go to the section of the plant designated as offering the greatest protection. These inside locations should be maintained until an "All Clear" has been announced on the emergency radio frequency and/or the plant steam whistle sounds the code call 5-1 * 5-1 * 5-1.

Since mobile trailers are particularly vulnerable to destructive winds, employees should not seek shelter in trailers. For those who might be in the open and have no time to find suitable shelter, they should lie flat in the nearest depression such as a ditch or ravine.

If wind damage or destruction results from high winds or actual contact, plant employees are to follow the emergency procedures for their own individual plants, such as procedures for power failure, fire, or emergency shutdown. If major damage results, employees should follow the Emergency Control Procedures, section IV, entitled "Explosion or Major Fire, Gas Release, or Other Major Disaster."

The National Weather Service is responsible for issuing weather warnings to the public. The safety officer on duty will listen to these broadcasts in order to relay this information on to our employees.

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CLEARANCE WORK PERMIT

APCI Employees

The purpose of the Clearance Work Permit system at this plant is to promote safety through the mutual cooperation and close association of the job between those employees who are responsible for the maintenance and/or construction of such equipment and those employees responsible for the operation of such equipment. The complexity of the plant operations requires that all employees concerned with the issuing and receiving of Clearance Work Permits be ever mindful of the purpose to be served by the system and use sound judgement in the administration of it.

A Clearance Work Permit must be obtained from the shift supervisor or operator designated by him before starting any hazardous jobs. Hazardous jobs include: all jobs affecting the process, opening of lines or equipment containing toxic materials, corrosive materials, flammables, high or low temperature, any pressure, and radiation sources. For operations involving VCM, the legal (OSHA) definition of hazardous operations is " . . . any operation, procedure, or activity where a release of either vinyl chloride liquid or gas might be expected as a consequence of the operation or because of an accident in the operation, which would result in an employee exposure in excess of the permissible exposure limit." Work Permits for work also requiring confined space entry or Hot Work Permits will be issued by plant superintendents or assistant plant superintendents only.

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Supervision will evaluate all jobs and decide those considered hazardous, using the above criteria for guidance. The procedure is initiated with a supervisor stamping each page of the Maintenance Work Order with the designed stamp to show the work order requires a Clearance Work Permit from the supervisor or an operator designated by him. This is to ensure that coordination has occurred between the issuing department and the department doing the work. Clearance Work Permits are issued to the Maintenance department by a shift supervisor or an operator designated by him in charge of the operating equipment involved or affected. It is the responsibility of the person issuing the Clearance Work Permit to be certain that the equipment or area involved or affected has been properly prepared and that the designated work can be performed safely under the conditions existing, and to alert maintenance of changes affecting the safety of the job (i.e., toxic or flammable releases). It is the responsibility of maintenance supervisor and employees to obtain permits for all hazardous jobs, to perform the specified work safely and properly, and to advise the employee issuing the permit of the status of the job at its completion or at the end of the shift, whichever occurs first. It is the responsibility of each employee to call attention to any factor, condition, or procedure which he believes will create a hazard.

Clearance Work Permits shall be prepared in triplicate. The original (white copy) is for the craft assigned to perform the work, the blue copy will be torn out of the permit book and placed on the permit board in the control room, and the yellow copy will remain in the permit book as a reference, if needed. The Clearance Work Permit

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will be effective until the job is completed or discontinued for that shift unless revoked by the shift supervisor. Maintenance supervision and operating supervision shall get together periodically during the work day and review outstanding permits, agreeing upon the work that has been completed and the work to be continued. Relieving operating supervision shall review the permits issued on the preceding shifts so that they will be informed as to the work completed and the work to be continued by reviewing the permit board in the control room.

On work to be performed on any line or equipment in which other departments have connections which may influence operations in any other department, the shift supervisor initiating the Work Permit covering such interdepartmental work shall obtain the approving signature of the appropriate shift supervisor in the affected department before issuing the permit. Examples include: welding on Emulsion plant ethylene line in other plant areas.

Clearance Work Permits are required before automotive or other equipment involving the use of an internal combustion engine are moved off designated roadways into operating areas, tank areas, or other such hazardous locations.

Clearance Work Permits will be signed by the craft when work is completed or as to status of the job at the end of the shift. This permit will be given to the shift supervisor, the supervisor in turn will get the matching blue copy from the permit board in the control room and sign it to indicate that the job has been accepted. The shift supervisor is to retain the white copy on file for 30 days. The craft will return the blue copy to his supervisor, who will retain the copy on file for 30 days.

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When necessary, due to a change of conditions which create a hazard, work will be stopped until the proper correction is made.

(This shall be done by the permit being pulled by any employee and returning it to the shift supervisor until proper correction is made and the permit reissued.) Clearance Work Permits that have a critical nature shall be issued at the time the job is to be performed.

Edwin K. McIntire
Safety Engineer

2/25/80
Date

J. J. Baliker
Plant Manager

2/25/80
Date

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Air Products and Chemicals
INC.

CALVERT CITY PLANT
INTEROFFICE MEMORANDUM

A. P. Cantor

To: DISTRIBUTION

Date: 27 February 1980

From: J. R. Travis

Copies: All Holders of Safety
Manuals
D. G. Jessup

Re: Revised Scrap Material
Regulations

Enclosed are the two (2) revised regulations governing the sale and removal of salable and no value scrap material from this facility. Please put these in your plant Safety Manual and post one copy on the bulletin board in your area for notification of all employees. These regulations are applicable immediately, but Mr. Jessup will hold the first sale of scrap material on Thursday, 6 March 1980.

If you have any questions concerning these regulations, please contact Ed McIntyre of the Safety department. If you need additional copies, please contact John R. Travis at extension 430.

Judy:
Please put in my
Safety Manual. Thanks.
AFC

John R. Travis
J. R. Travis

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Revised February, 1980

REGULATIONS FOR SALABLE SCRAP MATERIAL

The new scrap buying regulations are as follows:

1. All scrap to be bought must be sold from the salvage yard only. Under no circumstances will any scrap be sold from any other area.
2. Material desired by more than one person will be sold to the winner of a random drawing.
3. No company vehicles can be used to transport materials from the Salvage Yard to the Gatehouse. Personal vehicles can be used to transport material if insurance requirements are met.
4. All scrap material must be bought and removed from 1615 to 1715 each Thursday.
5. D. G. Jessup or someone he assigns will carry on all sales and issue gate passes.
6. Material which is sold can only be altered from its original salvage condition by cutting into smaller pieces prior to removal from the plant.
7. All sales are \$1.00 minimum and must be paid with correct change when gate pass is issued.

Edwin K. McIntyre
Safety Engineer

J. J. Baliker
Plant Manager

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Revised February, 1980

REGULATIONS FOR NO VALUE SCRAP MATERIAL

The removal of no charge or give-away items will be handled by the area superintendent who is responsible for the item.

1. Gate pass will be signed by area superintendent.
2. Material desired by more than one individual will be won by random drawing conducted by area superintendent.
3. Company vehicles cannot be used to transport material.
4. Personal vehicles can be used to transport scrap if insurance requirements are met.
5. All scrap material must be removed from 1615 5o 1715 each Thursday.

Edwin K. McIntyre
Safety Engineer

J. J. Baliker
Plant Manager

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SAFETY POLICY - CALVERT CITY PLANT

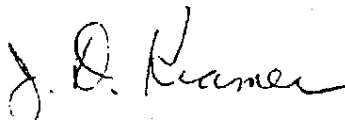
Every supervisor is accountable for the safety and health of the people and the prevention of loss to the equipment in his area of responsibility.

Every supervisor is responsible for making safety equal in importance to production, quality, cost, and employee morale. Unsafe acts which come to his attention are corrected on the spot.

Every supervisor is responsible for training his people to work safely, and for maintaining the standards established by the Central Safety Committee.

Each employee in the plant has a fundamental responsibility for his own and fellow employees safety by observing safety rules, using protective equipment, reporting unsafe conditions, and avoiding unsafe acts.

All hazards can be eliminated or guarded. All injuries are preventable.


J. D. Kramer

18 July 1977

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(PRSP #1)

STATEMENT OF CORPORATE POLICY

SAFETY

This Statement of Corporate Policy provides direction for the establishment and management of safety programs throughout all activities of the Company, with the objective of attaining leadership in safety performance.

POLICY

Air Products recognizes and accepts its moral and legal responsibility regarding safety. Therefore, it is our policy to conduct all Company activities with a maximum concern for the safety, health and environment of our employees, our customers, the communities in which we operate and the general public.

POLICY GUIDELINES

Accident Prevention

Means can be developed to prevent essentially all accidents when their potential causes are properly identified and analyzed. Every accident, whether or not it results in injury, property damage or both, must be reported to the Corporate Safety Department and will be thoroughly investigated.

Employee Safety

All employees shall be provided with the training, equipment and supervision necessary to enable them to accomplish their assigned tasks in a safe manner. Employees are in turn required to follow established safety procedures and should report any potential hazards. Supervisors shall promote safety on the job by education, encouragement and example.

Facilities, Products and Processes

All Company facilities, products and processes shall be given frequent formal safety reviews to ensure compliance with all applicable codes, standards and regulations, to identify existing or potential hazards and to determine the necessary corrective action.

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STATEMENT OF CORPORATE POLICY

SAFETY (cont'd)

Cooperation With Other Interested Parties

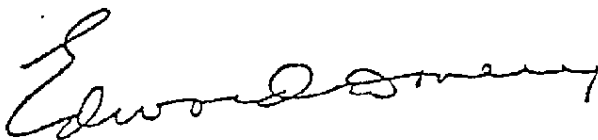
Assistance shall be provided to employees, customers, carriers, civic and governmental agencies in dealing with safety matters which relate to the Company's facilities, products and operations. Sufficient information and instruction to permit the safe transportation, handling, storage and use of the Company's products shall be provided to carriers, customers and, where practical, others who will actually utilize the products.

ADMINISTRATION

Strong safety performance, like other Company objectives, can be attained by setting specific goals and by planning, organizing and controlling to achieve them. Our drive for higher productivity and profits shall not compromise our responsibility for safety.

Line managers at all levels are responsible for the safety of employees, facilities, products and operations within their jurisdiction, for the development and implementation of programs to ensure the fulfillment of this responsibility and for reporting on these activities as requested by the Corporate Safety Director.

The Corporate Safety Director is responsible for ensuring that minimum safety requirements are met and that a consistent safety policy is available and is followed. This will be accomplished by providing assistance to management regarding safety matters, compiling and disseminating safety information, recommending necessary standards and guidelines, reviewing safety aspects of proposed new facilities, products and processes and by monitoring and evaluating safety programs and performance throughout the Company on a world-wide basis.



25 June 1976

(14)

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AIR PRODUCTS AND CHEMICALS, INC.

CALVERT CITY PLANT

SAFETY

J. D. KRAMER
PLANT MANAGER

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PLANT SAFETY PROGRAM 1977

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	YEAR	TOTAL MAN HRS WORKED FOR YEAR	LOST TIME ACCIDENTS	DAYS LOST	FREQ RATE FOR YEAR	SEVERITY RATE FOR YEAR	NATIONAL AVERAGE MFG CHEM ASSN FREQ SEV		DOCTORS CASES	MAN HRS OPERATED WITHOUT L/T ACCD	DAYS W/O L/T ACCD
(THRU SEPT)	1976	864,326	3	59	3.47	65			21	782,630	148
	1975	1,090,333	3	64	2.75	59	3.66	433	16	185,532	63
	1974	1,072,956	3	276	2.80	257	3.47	344	36	552,989	181
	1973	919,514	3	264	3.26	287	3.76	441	26	440,344	164
	1972	824,457	3	189	3.64	229	3.68	301	13	362,936	158
	1971	776,080	2	261	2.57	336	3.45	477	16	252,669	121
	1970	888,542	Ø	Ø	Ø	Ø	3.59	499	15	888,542	365
	1969	876,675	1	218	1.14	248	3.27	485	15	724,464	301
	1968	879,666	3	570	3.41	571	3.30	524	29	731,812	305
	1967	808,080	4	141	4.95	175	3.30	464	42	607,821	265
	1966	839,280	5	395	5.96	471	3.28	463	50	421,632	176
	1965	761,247	7	310	9.20	507	3.16	429	56	255,345	155
	1964	748,443	4	82	5.34	111	3.32	341	33	245,703	111
	1963	747,132	8	496	10.71	664	3.31	532	37	190,240	97
	1962	807,552	6	160	7.43	198	3.17	526	21	N/A	N/A
	1961	862,647	2	2	2.32	2	3.19	552	22	N/A	N/A
	1960	767,765	1	22	1.30	29	3.56	552	38	N/A	N/A
	1959	336,375	1	1	2.97	3	3.56	552	18	N/A	N/A
	1958	146,997	2	45	13.61	306	3.55	536	2	N/A	N/A

YEAR	TOTAL MAN HRS WORKED FOR YEAR	LOST TIME ACCIDENTS	DAYS LOST	FREQ RATE FOR YEAR	SEVERITY RATE FOR YEAR	NATIONAL AVERAGE			DOCTORS	MAN HRS OPERATED WITHOUT L/T ACCD	DAYS W/O L/T ACCD
						MFG FREQ	CHEM SEV	ASSN CASES			
1957	90,140	1	20	11.09	306	3.55	536	2	N/A	N/A	
1956	68,462	0	Ø	Ø	Ø						

• N/A - Not available

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SAFETY GOALS AND OBJECTIVES

I. PLANT MANAGER

A. Continuing Objectives

To have developed and continued a plant-wide safety awareness and responsibility that will ensure the well-being of all personnel consistent with sound management practices.

B. Goals

1. No lost time accidents in 1977.
2. Less than 30 medical cases in 1977.
3. Written plant-wide safety program in effect 1 January 1977.
4. Safety program monitored by Safety Department.

C. Standards

1. The Safety Department will have provided advice and counseling to all managers on safe working procedures for each department.
2. Periodic plant safety inspections are completed by each department manager in conjunction with the Safety Department.
3. Department safety meetings are held on a monthly basis to provide for specific training and interchange of ideas on safety.

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II. MANAGEMENT (ALL LEVELS)

A. Goals and Objectives

1. The Calvert Plant safety goal is "No lost time accidents in 1977."
2. Less than 30 medical cases in 1977.
3. To better both the frequency and severity rates of MCA for plants of similar size and our own frequency and severity rates for 1976.
4. To develop means and methods to prevent accidents and injuries.
5. To train each employee in the safe way to perform his work and provide him with the necessary safety equipment to accomplish his work in a safe manner.
6. To improve the medical examination program and provide better facilities for the first aid and medical program.
7. Full OSHA compliance in all areas.

B. Standard of Performance

1. Maximum of three lost time accidents per year.
2. Frequency and severity at least 10% better than MCA average.
3. CSC provides action plans to reduce accidents and injuries.
4. Training programs instituted for
 - a. Supervisors
 - b. Hourly workers

5. Enlarged first aid facilities permitting increased testing of new employees and also possibly performing parts of the VCM physical examination at the plant resulting in reduced costs.
6. OSHA standards communicated to all management personnel. Quarterly inspections conducted and violations corrected. Compliance to OSHA standards within monetary limits.

III. GENERAL

1. Each member of management has specific goals and objectives pertaining to safety as a part of their overall goals and objectives.
2. Goals and objectives and standards of performance relating to safety are reviewed with each supervisor.
3. Salary increases are dependent upon strong emphasis on and participation in safety industrial hygiene and loss prevention techniques and programs.

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CENTRAL SAFETY COMMITTEE

A. Membership

Plant Manager, chairman; Production Manager, vice chairman; Technical Manager; Project Manager Superintendent; Safety Manager; Operating Superintendents; Maintenance Manager; Superintendent of Utilities and Environmental Control; Superintendent Warehouse and Distribution; and Manager Industrial Relations.

B. Meeting Schedule

Second Wednesday of each month at 2:00 p.m. Time - 2 hours maximum.

C. Purpose

Direct plant safety effort toward improved compliance, reduced injuries and improved safety spirit.

D. Functions

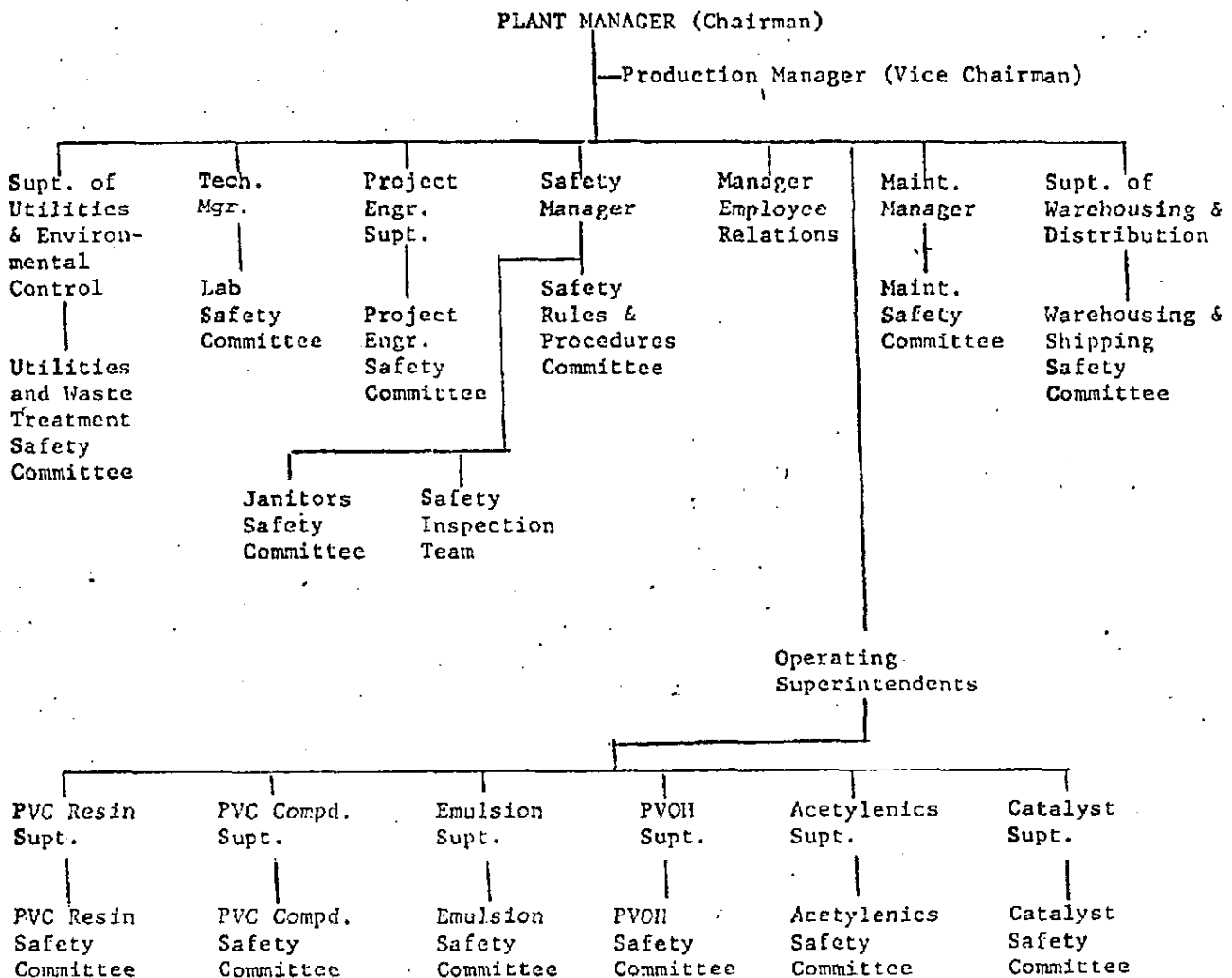
1. Review plant-wide safety performance.
 - a. Injuries
 - b. Occurrences
 - c. Audit Results
2. Exchange information among areas.
3. Review action taken on serious injuries and unusual occurrences.
4. Establish and review plant safety and loss prevention procedures.

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5. Analyze and review new or altered processes.
6. Establish areas of concern, priorities, and action plans.
7. Provide support for area activities.
8. Enlist support of, and provide guidance to group and corporate safety functions.
9. Review needs with respect to OSHA regulations.

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CENTRAL SAFETY COMMITTEE



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GUIDELINES FOR AREA SAFETY COMMITTEES

A. Membership

Operating Superintendents, Production Supervisors, and Shift Supervisors.

B. Meeting Schedule

Once per month prior to CSC meeting. Time - 1.5 hours maximum.

C. Purpose

Direct area safety effort toward improved compliance, reduced injuries and improved safety spirit.

C. Functions

1. Review and evaluate area safety performance with special emphasis on investigation of lost time accidents, medical cases, and "near misses."
2. Review area's inspection performance.
3. Identify training needs and priorities.
4. Review safety meeting activity and progress on suggestions.
5. Review new equipment and processes.
6. Make recommendations to CSC.
7. Review CSC priorities with area personnel.
8. Report on area's problems, actions and needs at CSC meeting.
9. Provide assistance to shifts.

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OTHER COMMITTEES

I. LABORATORY SAFETY COMMITTEE

The chief chemist will chair the Lab committee and will report through the Technical Manager to the CSC.

II. MAINTENANCE SAFETY COMMITTEE

Will be chaired on a rotating basis by Maintenance Supervisors and will follow the Guidelines of the Area Safety Committee.

III. WAREHOUSE, STOREROOM, UTILITIES, WASTE TREATMENT, AND JANITORS
SAFETY COMMITTEES

Will be chaired by the Superintendent or Department Head and will follow the Guidelines of the Area Safety Committee.

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GUIDELINES FOR RULES AND PROCEDURES COMMITTEE

A. Membership

Operating Superintendents, Superintendent Utilities and Environmental Control, Chief Chemist, Maintenance Superintendent, Superintendent Warehouse and Distribution, and Safety Staff.

B. Meeting Schedule

Once per month prior to CSC meeting.

C. Purpose

A continuing review, renewing, and recommending of safety rules and procedures for submission and approval of the CSC.

D. Functions

1. Review and update safety rules.
2. Review and update safety policies.
3. Recommend new rules and procedures to CSC.
4. Review injuries and accidents for recommendations to CSC to prevent reoccurrences.

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SAFETY, INDUSTRIAL HYGIENE AND FIRE
PROTECTION PROGRAM FOR THE CALENDAR

YEAR 1977

I. INTRODUCTION

Safety is our responsibility in management. It is our number one responsibility. Accident prevention and efficient production go hand-in-hand. All levels of management therefore have a primary responsibility for the safety and well-being of all employees. This responsibility can be met only by working continuously to promote safe work practices among all employees.

This program is to enable us to meet these responsibilities and comply with the Occupational Safety and Health Act. It is issued for your guidance and adherence.

II. RESPONSIBILITY

- A. The Plant Manager is responsible for the overall functioning of this safety program and is ultimately accountable for plant safety performance.
- B. All levels of management have the prime responsibility for the safety of people, equipment, and facilities assigned to them, and the incorporation of effective safety and loss prevention techniques and programs.
- C. The Safety Department staff is responsible for the overall coordination of the safety program including process safety engineering, industrial hygiene, training, and

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OSHA compliance. The Safety Department is responsible for fire protection, medical department, specifying safety equipment, and periodic auditing of the program.

III. SCOPE OF THE PROGRAM

All program activities will be divided into six categories.

1. Personnel Safety (Industrial Hygiene)
2. Process Safety
3. OSHA Compliance
4. Training
5. Fire Protection
6. Miscellaneous

IV. INDUSTRIAL HYGIENE

The Safety Engineer will define existing and potential problem areas in industrial hygiene.

The industrial hygiene program is divided into six major areas:

1. Defining the exposures for each toxic material in each operating plant or area.
2. Analyzing the source of each exposure.
3. Eliminating or reducing the exposure to acceptable levels by:
 - a. Engineering means.
 - b. Well defined and enforced safe work practices.
 - c. Personnel protection.
 - d. Personal hygiene.

4. Training
5. Medical Program
6. Recordkeeping

The activities and training of supervision will be coordinated by the Safety Engineer.

Employee training will be the responsibility of the supervisor.

V. PROCESS SAFETY

The goal of process safety is primarily preventative. Conditions that might adversely affect the safety and health of employees are eliminated in the process design stage, in maintenance, and in operations.

Initial prevention of unsafe conditions is vital. New processes and equipment, and major changes in existing processes and equipment, will be reviewed by the Safety Engineer. The Safety Engineer will furnish technical and design information relevant to safety, industrial hygiene, and fire protection.

Supervision in production and in maintenance will primarily see that the integrity of the original design is maintained. They will consult with the Safety Engineer whenever major process or equipment changes are undertaken. Operating instructions will be updated when a change is made.

VI. OSHA COMPLIANCE

Our objective is to have full OSHA compliance in all our operations. To achieve this objective the Safety Department will:

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1. Make quarterly inspections of each operation.
2. Issue listing covering items needing correcting and obtain dates for correcting.
3. Train supervision in OSHA training requirements.
4. Audit supervisors' training and documentation.

VII. TRAINING

Training is essential to a safe work environment, both in preventing accidents and in properly responding to them. An untrained employee is a potential safety hazard to both himself and to his coworkers. The responsibility of training rests primarily with supervision. Training at all plants will include for:

A. Hourly Employees

Safe Work Practices (SWP's) are the backbone of the training program for the hourly employee. They are especially important for work that does not require formal classroom training like most of what is done by the hourly employee. Feedback from this training will assist in preparing SWP's both to obtain maximum accuracy and to enhance the worker's safety consciousness.

Training using SWP's can best be done on-the-job. This training is also well adapted to use at safety meetings (including a review of the SWP). Review of basic SWP's such as on tank entry, use of respirators, hot work permits, etc., is needed approximately annually, and is especially suitable for safety meetings.

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All training shall be documented in writing (handwriting will do) including the nature of the training and the approximate time spent. Each SWP reviewed with the employees will be noted, each basic safety training item (such as hot work, respirator, etc.) will be noted. Training required by OSHA will be documented in each employee's personnel file.

The Safety Department will periodically review all training as a part of the safety audit of supervision.

All training records will be kept a minimum of five years, and will be turned over to the Safety Department in lieu of disposal. All safe work practices will be reviewed and updated at least every two years by both the initiator and the Safety Department.

B. Supervision

In 1977 special emphasis will be placed upon the safety training of supervisors. They will participate in outside training courses, loss prevention meetings, technical seminars, and OSHA seminars.

Liberty Mutual will present their "Supervisory Safety Training Program" for all our supervisors.

We will continue to keep our Safety Officers trained in the latest and best methods for fire fighting and first aid treatment. All Safety Officers will maintain updated Red Cross First Aid Instructors Certificates or Emergency Medical Technician certification. Our Plant Nurse will conduct a review of inplant first aid treatment for the Safety Officers.

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We will continue to send our Plant Nurse to training sessions and special seminars in her field.

VIII. FIRE PROTECTION

All plants shall maintain an effective fire protection program. Therefore, each plant shall have participants in the Quarterly Fire and Rescue Training Program from each shift.

The Fire and Rescue Training course will continue on a quarterly basis and shall be attended by both supervisory and hourly personnel. The course will continue to include the Multi-Media First Aid Course. Our goal is to continually have all our employees receive this training.

The Safety staff at the Calvert plant will be present for the periodic testing of fire protection systems at Calvert in conjunction with the insurance carrier's field man.

IX. MISCELLANEOUS

A. Insurance Company Contact

The Safety staff is primarily responsible for inter-relations between our insurance carriers and the production plants. The Calvert Plant Safety staff will review insurance company recommendations and will propose the action to be followed. This proposed action will be reviewed by appropriate Calvert City, Chemicals Group, and Corporate personnel as required.

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B. Supervisors' Safety Meetings

All Operating Plants, Maintenance, and the Non-Operating Departments will hold monthly meetings between the supervisor and his employees. These will be held once a month for each operating foreman on a swing shift, for maintenance, and for the laborers. Groups without supervision on each shift will hold a minimum of a quarterly meeting. The foreman or supervisor shall give a written report to his supervisor, and this report is also either sent to the safety staff or a member of the safety staff will attend each meeting and assist the supervisor in presenting the program.

C. Maintenance of Employee Interest

1. Bulletins, Pamphlets, Posters, and Films

- a. We will continue to post on the large bulletin boards appropriate safety slogans and the lost time accident record for the plant.
- b. We will continue to provide our management personnel with appropriate safety booklets or magazines during 1977.
- c. Safety News Sheet - We will publish a safety news letter when special items of interest dictate.

2. Recognition

- a. We will continue the issuance of Wise Owl Awards to those employees whose eyes have been saved from serious injuries because of the wearing of suitable eye protection.

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- b. We will establish a recognition program for the plant, department and individual for specific safety records.

D. External Assistance and Cooperation

1. Calvert City will continue to participate in CIMAP in our Industrial Community.
2. We will continue to cooperate with and seek guidance from the representatives of our Insurance Carriers and our Corporate and Group Safety Office.
3. Four Rivers Safety Council
4. Participation in the new safety courses and program now being presented by Murray State University.

E. Emergency Manuals

1. Each operating plant will prepare or update an emergency manual specifically written for the particular plant listing the steps to be taken in case of emergency conditions, such as loss of power, water, critical equipment, exposure to toxic materials, or fire. The draft will be reviewed by Maintenance, Utilities, Safety staff, and the Plant Manager as a part of the process safety audit.
2. The Safety staff will maintain an emergency manual containing effective evacuation procedures and methods accounting for all personnel in this plant.

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F. Medical

To insure the physical safety of our employees we will continue to provide all employees with the best medical advice and treatment possible. The VCM medical surveillance program will be administered as required by OSHA. Additional testing and medical support will be added when the first aid facilities are expanded. The required OSHA medical records will be maintained during the year.

G. Housekeeping

All personnel of a plant are responsible for housekeeping. An employee's safety pattern and attitude are set by housekeeping. To accomplish this end each plant and department will make an inspection of their area monthly documenting their findings. A follow-up will be made prior to the next inspection.

H. Safety Inspections

1. Safety inspections are to be conducted by all members of management with their subordinates each week. This is a two-man audit starting with the Plant Manager and his immediate subordinates through their areas of responsibility and so on down the line to include the foremen.
2. The line supervisor has the direct proprietary responsibility for:
 - a. Testing safety showers and eye wash stations daily on each shift.

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- b. Checking to see that fire extinguishers are in place and not blocked.
- c. Inspect continually for Unsafe Acts and Footprints of Unsafe Acts.

I. Safety Philosophy - Five Points

1. All injuries can be prevented.

The key word here is "all". This is a realistic goal and not just a theoretical objective. A supervisor with responsibility for the well-being of employees cannot be effective without fully accepting this principle.

2. Management, which includes all levels through the foreman, has the responsibility for preventing personal injuries.

Since line organization has the responsibility for every operational activity of the company, each supervisor must accept his share of the responsibility for the safety of the employees.

3. It is possible to safeguard all operating exposures which may result in injuries.

It is preferable, of course, to eliminate the sources of danger. However, where this is not reasonable or practical, supervision must resort to such measures as the use of guards, safety devices, and protective clothing. No matter what the exposure, an effective safeguard can be provided.

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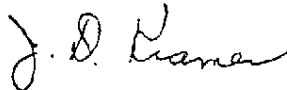
4. It is necessary to train all employees to work safely and to understand that it is to their advantage, as well as the company's, to work safety and that they have a definite responsibility to do so.

Adequate training of the employee is a responsibility of supervision. Each individual, however, must be convinced that he has a responsibility for working safely and that to do so not only benefits the company but indeed is a very real personal benefit.

5. It is good business from the standpoint of both efficiency and economy to prevent personal injuries on the job and off the job.

In addition to humanitarian considerations, injuries cost money and reduce efficiency.

At the Calvert Plant safety is on a par with quality, yield, production, cost, employee relations, etc. The full cooperation of each employee in our safety program will enable us to accomplish our goal of "operation in an efficient and safe manner".



J. D. Kramer

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GENERAL PLANT SAFETY RULES

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PRSPPP #5

GENERAL PLANT SAFETY RULES

Basic Policy

1. All injuries are preventable.
2. You are NOT expected to take risks. The common sense safe way is the best way to do each job.
3. Report to work rested, alert, fit to give full attention to your job.
4. Report any unsafe act or condition. Your active support for safety is for your own protection.
5. Positively no horseplay on the job. Practical jokes often end up as serious injuries.
6. Report all accidents to foreman immediately (whether injured or not) to help correct problems. If injured report to First Aid immediately, no matter how small the injury may be.
7. Operate all equipment as instructed. Follow Safe Work Practices and written procedures when available to obtain maximum accuracy and to enhance your safety consciousness. If in doubt about instructions ask your supervisor.
8. Preventing injury requires your personal effort. Most accidents occur because of an unsafe act--a chance was taken by not working safely. You are the person closest to your job, and are responsible for safely doing all tasks associated with your job.

What to Wear

1. Wear your safety glasses during working hours as indicated in "The Wearing of Eye Protection" policy. When other approved eye protection is required for specific work, wear as set forth in the General Safety Rules.
2. Wear goggles or face shield when working in areas where acids, bases, or other dangerous chemicals are present, in a pipe under pressure, or being dumped.

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3. Wear goggles or safety glasses/face shield when grinding either with a stationary grinder, a portable grinder (such as a sidearm or end grinder), or when using a drill press.
4. Contact lens - Do not wear contact lens during working hours except by written permission of the safety department.
5. Welding can be carried out only if the welder and his assistant are using approved welding goggles or welding hoods with suitable protective lens. Tinted safety glasses are not a substitute for welding goggles or lens.
6. Wear your hard hats during working hours as indicated in "The Wearing of Hard Hats" policy.
7. Where personal protective equipment is provided, wear and care for each as instructed.
8. Wear approved safety shoes and keep them in good condition.
9. Wear proper respirator if you know or expect a possible high concentration of vapor or dust. Keep equipment clean and in good working order. Refer to the "Respiratory Protection Program" for details.
10. Special safety equipment is provided for your protection. Use when required. Keep in good condition. Report loss or damage immediately to your foreman.
11. Loose fitting jewelry, such as bracelets, neck chains, ear rings, etc., are not to be worn on the job.
12. Always wear gloves when handling steel cables, lumber, material with rough edges.
13. Be cautious about wearing gloves when grinding parts or operating machinery with exposed moving parts.
14. Wear ear protection (ear plugs or ear muffs) when you work in noisy areas for long periods of time.
15. Wear clothing suitable for weather and your work. Shirts must have a minimum sleeve length of six (6) inches. Shirt tails are to be worn inside the pants and the shirt buttoned up the front to the second button. Loose fitting or torn clothing is dangerous.

Attitude, Safety

1. Keep your mind on your job--and temper under control--always!
2. Rely on your supervisor's knowledge and experience if you do not understand any rule or work operation.

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3. Work with care and good judgement at all times to avoid accidents-- whether or not a specific rule is contained in this manual.
4. Give your wholehearted support to safety activities. Preventing your accident depends mostly on YOU!

Aisles/Roadways

1. Use passageways as directed. Shortcuts behind machines; over conveyors; climbing over, between, or under railroad cars; under a crane load; under elevated fork lift load; and off platforms are prohibited and dangerous.
2. Running is not permitted at any time.

Bypassing Safety Devices

It is the policy of this work location not to bypass or otherwise render ineffective any safety device, which has been installed on any piece of equipment without first following an established procedure. This procedure is to insure, (a) that the purpose for which the safety device was originally intended no longer exists, or (b) that in the interim while the safety device is bypassed adequate measures are taken by those in responsible charge to see that another method of obtaining the same degree of protection is in force at the time of the bypass, and for the entire time that the safety device is bypassed. The safety department is to be notified in writing every time a safety device is bypassed.

Compressed Air, Use Of

1. Compressed air used for cleaning purposes shall not exceed 30 psi (usually a safety nozzle is needed).
2. Do not use compressed air to blow dust from your clothing or body--a vacuum cleaner is safer.

Compressed Gas Cylinders

1. Valve protection caps shall be in place when compressed gas cylinders are transported, moved or stored.
2. Cylinder valves shall be closed where work is finished.
3. Compressed gas cylinders shall be secured at all times, except when cylinders are actually being hoisted or carried.

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Cranes, Cherrypickers, Hoists

1. Rated load capacities posted in the cab or on the hoist or crane will be followed. Always find out the weight of anything you are hoisting (truck drivers usually know the weights of what they haul).
2. Never hoist or swing a load over anyone.
3. Make sure the cable and chokers are in good condition and adequate size before starting to move heavy loads. Each hook must have a safety clip.

Electrical Safety Rules

1. When working on electrical equipment follow the "Plant Lockout Procedures".
2. It is the responsibility of every employee operating electrical equipment to report all defects to his foreman as soon as they are discovered.
3. All portable power tools must be grounded or double insulated.
4. No one except qualified electricians should work on electrical repairs in motor control centers except to throw breaker switches.
5. When working on or near electrical equipment or machines do not wear metal jewelry.

Entering Tanks, Vessels, and Confined Spaces

When entering a tank or similar enclosure, always follow the "Tank and Vessel Entry Procedure".

Fire Prevention

1. Obey the "Smoking Permitted" signs and follow the smoking policy.
2. Matches that strike anywhere are not permitted in the plant.
3. Always use ash trays and containers. Never toss matches or butts into trash containers.
4. When flammable liquids are used, beware! Positively NO open flames, smoking or electric sparks.
5. Never smoke, light a torch, weld or have an open flame around a manway.
6. Fire doors, extinguishers, sprinklers and exits must be kept clear for instant use--always!
7. Know the procedure for fire reporting, fire exits and fire extinguishing. Be ready for emergencies.

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Fire Safety Rules

1. If you spot a fire call the safety officer immediately at the emergency number 300, at extension 254, or use a radio (safety unit is "base").
2. Familiarize yourself with the location of the fire extinguishers, safety showers, hose carts and fire hydrants in your work area.
3. Do not hang clothing or stack material around fire extinguishers or block off hose carts or fire hydrants.
4. When you use a fire extinguisher notify the safety department so it can be recharged. Bring the extinguisher to the safety officer at the gate.
5. Gasoline must be transported in safety cans and shall not be used for cleaning purposes.
6. Fire hoses are not to be removed from their location and used except for fire protection, except by safety department permission. After being used, fire hoses must be properly cleaned before storing.

Flammable and Combustible Liquids

Only safety cans or approved portable tanks will be used for the storage and handling of flammable and combustible liquids outside of the operating area of a plant.

Grinders

1. Stationary grinders should not be used unless a tool rest is less than 1/8 inch from the grinding wheel and the chip guard is less than 1/4 inch from the wheel.
2. Do not grind aluminum or magnesium on a common grinding wheel. A special wheel is made for grinding these materials.
3. Wear face shields or goggles when using a stationary or portable grinder such as a sidcarm or end grinder.
4. When installing a grinding wheel check on the rated speed of the wheel.

Guards

1. Do not operate a power transmission apparatus (belts, gears, etc.) unless they are guarded.
2. When machinery guards are removed to repair a machine, they must be replaced when the work is finished.

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Heights, Working From

1. Trash and other material must not be thrown from the upper levels of any structure without roping off the area below.
2. Never work above a passageway or work area unless you have roped off the area below or placed suitable warning signs.
3. When working above 4 feet from the ground, either be protected by guard rails or be tied off with a safety harness or belt unless working from a ladder (see ladder policy).

Hot Work, Welding, Operating Vehicles in Restricted Areas

1. The "Hot Work Procedure" is to be followed in all locations of the plant except as follows:
 - a. In and immediately adjacent to maintenance shops.
 - b. Burn pit
 - c. Vehicles moving on plant roads that are not barricaded, etc., because of possible high flammable vapor concentrations.
2. Never smoke, light a torch, or weld around a manway until covered by hot work procedure.

Housekeeping

1. Help make your work place healthy, pleasant, and safe by keeping it clean.
2. Pick up those small or large items that can cause a slip, trip, or fall.
3. Littering not only looks bad but creates a hazard.
4. A job is not complete until all leftover and scrap material is removed.
5. All eating waste and soft drink cans are to be disposed of in covered trash receptacles.
6. Follow individual plant's procedures for disposing of its chemical wastes.

Ladders

A. General

1. Be sure they are in good condition, set firmly and at a safe angle. avoid stretching, take time to move ladder.
2. Always follow the "Ladder and Scaffold Safety Policy".

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B. Straight Ladders

1. Tying off ladders will make them more secure. Have someone hold the ladder while it is being tied off. A six-foot rope should be left with the ladder or kept on hand for use in tying off ladders.
 2. Tying yourself off with a safety belt or harness and a lanyard (rope) is often needed when working off a ladder.
- C. "Step Ladders, Ladder Care and Maintenance and Scaffolds" are discussed later in this manual.

Lockout--Using Equipment

1. Never work on any mechanical equipment until it has been stopped and the switches locked out. (Plant Lockout Procedure)
2. No unauthorized person shall ever start up or shut down a piece of equipment in any department without having first received permission from the foreman of the department where the work is being done.

Material Handling (Especially Lifting)

1. Size up the load which must be handled. If the load is too big to handle, do one of three things:
 - a. Get help.
 - b. Use special equipment.
 - c. If the material can be broken up in smaller amounts that can easily be handled, do so.
2. Laws of Lifting
 - a. Feet parted - one alongside, one behind object.
 - b. Sit-down position with spine straight, but not completely vertical.
 - c. Chin tucked in to line up neck with spine.
 - d. Grip object with whole hand using palm, not just fingers.
 - e. Elbows and arms tucked in for more power.
 - f. Body weight directly over feet. Start lift with thrust by legs-- not your back.
 - g. Weight not to exceed pounds at one lift.

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3. Before you lift any load know where you're going with it. Plan a direct, obstacle-free route.
4. When carrying long pieces, look out for others. As a general rule, the leading end of long pieces should be high and the trailing end should be low.

Railroad

1. Warning signals (blue sign) must be placed on the railroad car or track before loading, unloading or sampling cars. The railroad car must be chocked while loading or unloading (or in alleys, brakes firmly set).
2. No one shall attempt to open or close a boxcar door when the car is in motion.
3. No one shall ride or mount a railroad car while it is in motion by a switch engine.

Safety Showers, Eyewash, Corrosive Materials

1. If any corrosive material touches your body, rinse it off immediately with large amounts of water, then report to First Aid for treatment.
2. Know the location of safety showers and eyewash in your work area. Any defect in these should be reported immediately to the supervisor.

Stairs

1. Avoid a crippling fall. Take one step at a time. No running! Hold handrail. See your way.
2. Do not carry shovels, sledges, or other heavy or sharp-edged tools over your shoulder when going up or down stairs.

Storage

1. All material stored in tiers shall be stacked or secured to prevent sliding, falling or collapse.
2. Aisle and passageways shall be kept clear.
3. No exits, fire extinguishers, and standpipe fire hose shall be obstructed.

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Temporary Hazardous Areas

1. Rope, tape, or barricade all areas that could be dangerous to someone passing through. Wherever possible, use a warning sign that states the hazard. This includes:
 - a. Using a hoist overhead.
 - b. Unplugging a transfer line.
 - c. Excavations, pits, ditches or open manholes.
 - d. Toxic vapor concentrations in excess of the permissible exposure limits. Use signs to explain the hazard.
 - e. When working overhead.
 - f. Throwing from roofs or elevated structures.
 - g. Bleeding down pressured equipment.
2. A black-yellow striped tape means a temporary restricted area that can be entered only by persons knowing the hazards, and properly protected from these hazards.

Tools

1. Use only tools in good condition. Wrenches shall not be used when jaws are sprung to the point that slippage occurs. Impact tools shall be kept free of mushroomed heads. Wooden handles of tools shall be kept free of splinters or cracks and shall be kept tight in the tool.
2. Always use the right tool for each job and use it correctly. An adjustable wrench should generally not be used. Whenever possible box end wrenches are to be used.
3. Put tools away after use. Tools carried in the pocket or misplaced can cause painful injuries.

Toxic Materials

All materials and substances are harmful to some degree. To control your exposure to these materials it is necessary to have a well-rounded program to keep your exposure to toxic materials low. It is essential that you do the following action as a part of your workday:

1. Follow established practices and procedures on doing a specified job.
2. Where procedures are not available, try to contain materials in equipment, especially organic vapors, or control the release through local ventilation.

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3. When exposure is unavoidable except by wearing respirators, gloves, etc., wear the necessary protective equipment.
4. Do your part. Don't expect another craftsman or person to do everything.

Trenches

Do not enter a trench or excavation more than 4 feet deep unless it is properly shored or sloped and has a ladder every 25 feet.

Truck Trailers

All trailers must be chocked before loading and unloading.

Unplugging Transfer Lines

When unplugging a line, always follow the "Line Unplugging Procedure".

Vehicles and Mechanized Equipment

1. It is the responsibility of each employee to report immediately any defect (brakes, lights, horn, hoist mechanism, and etc.) to his supervisor.
2. Slow cautious speeds are to be observed throughout the in-plant areas. Speed limit in the plant is 15 mph maximum.
3. Vehicles are to carry no more people at one time than they are designed to seat. No personnel are to ride in the back of open trucks unless they are steadying an object being transported.
4. Do not start up or drive vehicles into areas blocked off by red flags, road block signs, or barricades.
5. No one shall operate any company vehicle in or out of the plant unless they possess a valid driver's license.
6. Vehicles shall be parked in designated areas, and in a safe manner.
7. Smoking is not permitted in any vehicle on plant roads.
8. Check each vehicle (except cars and trucks) at the beginning of a shift.
9. Back motor vehicle equipment with an obstructed rear view only if:
 - a. A reverse signal alarm is installed,
 - b. You use your horn, or
 - c. An observer signals that it is safe to do so.

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Welding

1. General welding, cutting and heating operations may normally be done outdoors without mechanical ventilation or respiratory protection equipment. But where the area is confined, as inside a tank, suitable ventilation or respiratory protection shall be used. Local or general ventilation is usually desirable indoors.
2. A valve wrench must be kept attached to the acetylene cylinder of each rig used.
3. Use no oil or grease around the valves of oxygen welding equipment.
4. Keep all welding connections gas tight between the nozzle and cylinders. When equipment is not being used, keep the valves closed and pressure off the regulator and hose. Do not drop the bottle pressure below 50 psi.
5. Hose, welding cables and ropes must not be placed across stairways or passageways in such a way as to present a tripping hazard.
6. Compressed gas cylinders must be secured in an upright position at all times.
7. Welding can be carried out only if the welder and his assistant are using approved welding goggles or hoods with protective lens. Tinted safety glasses are not a substitute for welding goggles or lens.
8. Never watch any type of welding unless you are wearing proper welding protective equipment.
9. It is the welder's responsibility to set up shields before starting to weld.

Warning Tapes and Signs - Temporary (See Temporary Hazardous Areas)

Work Area

1. Work areas must be kept clean and tools in their proper places.
2. Do not leave leftover or scrap material lying in the work area. Put scrap material in the dumpster or return to the salvage yard and return new leftover material to the storeroom.
3. Do not leave nails protruding from boards or crating lying in work areas.

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THE WEARING OF EYE PROTECTION

Employees are permitted to travel from the Gatehouse to the time clock without eye protection. The same rule applies to traveling from the time clock to the Gatehouse when leaving the plant.

Employees entering and leaving the plant must travel via the roadways. Passing through operating plants and warehouses is prohibited, in these instances, unless safety protection is worn.

During work hours for an employee, the following rules will apply. Listed below are the areas where the wearing of eye protection IS NOT REQUIRED.

1. Administration building parking lots.
2. Laboratories except designated areas.
3. Control Rooms
4. Lunch Rooms
5. Offices
6. Locker Rooms
7. Rest Rooms

Employee's who do not know for certain that a particular area is exempt from wearing eye protection shall consider the area as NOT BEING EXEMPT until he checks with the management of the area.

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DESIGNATED SMOKING AREAS

The following designated areas where SMOKING MAY BE PERMISSIBLE are listed for the people who may not be familiar with the company policy concerning smoking within the plant.

Smoking is permitted in these areas only if a "SMOKING PERMITTED" sign is present.

1. Control Rooms (except the PVC plant)
2. Lunch Rooms
3. Offices (except the PVC plant)
4. Locker Rooms (except at the Emulsion plant)
5. Restrooms, all except those located in non-smoking production areas.
6. Maintenance Shops
7. Boiler House Area
8. Laboratory, Designated Areas Only
9. Caustic Building at Acetylenics plant
10. Special Designated Smoking Areas (Contractors, etc., assigned when requested and approved by both Safety department and department superintendent.)

NOTE: SMOKING IS NOT PERMITTED ON THE COMPANY STREETS OR IN ANY PLANT AREA NOT LISTED ABOVE OR THE RIVER FACILITY WHETHER IN A VEHICLE OR WALKING. STRIKE ANYWHERE MATCHES ARE NOT PERMITTED IN THE PLANT AT ANY TIME.

EMPLOYEES WHO DO NOT KNOW FOR CERTAIN THAT A PARTICULAR AREA IS A SMOKING AREA SHALL CONSIDER IT TO BE A NON-SMOKING AREA UNTIL CHECKING WITH THE MANAGEMENT OF THE AREA.

Edwin K. McIntyre
Safety Engineer

John Galiker
Plant Manager

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THE WEARING OF HARD HATS

Employees are permitted to travel from the Gatehouse to the time clock without the protection of a hard hat. The same rule applies to traveling from the time clock to the Gatehouse when leaving the plant.

Employees entering and leaving the plant must travel via the roadways. Passing through operating plants and warehouses is prohibited, in these instances, unless safety protection is worn.

During working hours for an employee the following rules apply. Listed below are the areas where the wearing of hard hats IS NOT REQUIRED.

1. Administration building parking lot.
2. Laboratories
3. Control Rooms
4. Lunch Rooms
5. Offices
6. Locker Rooms
7. Rest Rooms
8. When the wearing of the hat is hazardous to the person or production process.

Employee's who do not know for certain that a particular area is exempt from wearing hard hats shall consider the area as NOT BEING EXEMPT until he checks with the management of the area.

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