

VINYL CHLORIDE AND AREA MONITORING MONOMER ALARM SYSTEM, PVC RESIN DEPARTMENT

The VCM alarm system at PVC monitors up to 16 points while providing a two-level alarm system in the manufacturing plant and storage areas. It is made up of Bendix sampling boards which continuously draw air samples from the test points giving a low time span between the time which the sample was tested and the time which the sample was taken.

The samples are tested in a gas chromatograph from Bendix, Model 007 Analyzer.

Data gathering, comparison, input, and output is handled by a Hewlett Packard 2108A mini-computer with 24K of memory and a Texas Instruments Silent 700 printer/tape cassette recorder.

The vinyl chloride alarm system is based on two-levels, low level, currently set at 1.0ppm VCM, and high level, currently set at 25ppm VCM. Alarm operation is as follows:

1. Low Level - Initiating rotating blue alarm lights in specific plant areas, indicating the need for operating personnel to wear approved respiratory protection.
2. High Level - Initiating a horn in the appropriate area, which requires the wearing of airline or self-contained respiratory protection.

The alarm set points are entered into the computer which then compares all tests to these set points. Once exceeded, the appropriate alarm(s) for the corresponding area(s) are initiated. The alarm(s) are designed to remain on until another test of the area through the sample system and a chromatograph produces a VCM concentration under the set point. The low level alarm is automatically activated when the high level set point is exceeded.

EPA monitoring points are annunciated on a panel in the MAC Room if the alarm set points are exceeded. This will alert personnel to leaking equipment that requires investigation and correction.

The control center, housing the above equipment, is located in the PVC area, close to the main personnel entrance. It also has an annunciator which displays all alarms at PVC and their level, low or high. This can be seen from outside the center and gives an indication at a glance of the alarm situation in the many areas at PVC

PORTABLE ANALYZERS

Century OVA 98 total hydrocarbon analyzers and/or Hnu photoionizers are used to back-up the Bendix Monitoring System and to locate random VCM leaks.

Update - February, 1982. Ecolyzer 400 LFL, Oxygen Analyzer, Monitor has been purchased for monitoring in remote areas.

VINYL CHLORIDE MONOMER ALARM SYSTEM, PVC RESIN DEPARTMENT

Specific alarm locations are as follows:

<u>ALARM</u>	<u>AREA/ACTUAL LOCATION</u>
Light	Bldg. 1-E Upper, at control panelboard, above main walkway.
Light	Bldg. 1-W Upper, at south control panelboard, above walkway.
Horn	Bldg. 1 Upper, between Bldgs. 1-E & W, where main walkways from Bldgs. 1-E & W and 7 intersect.
Light	Bldg. 7-E Upper, at control panelboard, above walkway.
Light	Bldg. 7-W Upper, at control panelboard, above walkway.
Horn	Bldg. 7 Upper, above operator's desk, near Bldg. 7-E Panelboard.
Light	Bldg. 1 Lower, lane between Bldgs. 1-E & 1-W Lower, south side, where main walkways and sight lines from Bldgs. 1-E, W, and 7 Lower intersect.
Horn	Bldg. 1 Lower, next to <u>light</u> , Bldg. 1- Lower.
Light	Bldg. 7 Lower, north side of large support post, near blend tanks, along main walkway.
Horn	Bldg. 7 Lower, next to <u>light</u> , Bldg. 7 Lower.
Light	Pilot Plant, stairway, main reactor level, near main walkway.
Horn	Pilot Plant, stairway, main reactor level, near main walkway.
Light	Dryer Area, above main walkway/line of sight between 9' and 12' dryers.
Horn	Dryer Area, next to <u>light</u> , dryer area.
Light	Control Lab., above main walkway.
Horn	Control Lab., above main walkway.
Light	Force Flow Packer, adjacent to fire alarm location indicators.
Horn	Force Flow Packer, adjacent to fire alarm location indicators.
Light	Bldg. 8 Whse., at entrance, above main passageway and sight line.
Horn	Bldg. 8 Whse., at entrance, above main passageway and sight line.
Light	Bldg. 4 Whse., at entrance, above main passageway and sight line.
Horn	Bldg. 4 Whse., at entrance, above main passageway and sight line.
Light	Bldg. 4-A Whse., at entrance, above main passageway and sight line.

Leominster Site
Vinyl Chloride Monomer Alarm System
PVC Resin Department
Alarm Locations
Page 2

<u>ALARM</u>	<u>AREA/ACTUAL LOCATION</u>
Light	Bldg. 10, Semi-Pilot Plant.
Horn	Bldg. 10, Semi-Pilot Plant.
Light	New Recovery Building.
Horn	New Recovery Building.

Revised: June 1, 1982
September 1, 1983

VCM EMERGENCY PLAN - PVC DEPARTMENT

DEFINITION:

An emergency is defined as the existence of a concentration exceeding 100ppm Vinyl Chloride in air resulting from a massive release from an uncontrolled source.

EQUIPMENT:

The only respiratory equipment approved for use in dealing with an emergency is the Scott Air Pak. These units are located as follows:

- 2 - MCC #3-A emergency center
- 1 - Bldg. 7 East Wall Upstairs
- 1 - Bldg. 7 Lower near stairway
- 1 - Bldg. 1-W at west stairwell
- 1 - Bldg. 1-E outside fire door - downstairs
- 1 - Bldg. 1-E upstairs near maintenance supply room
- 1 - Safety Equipment Room
- 1 - Supervisor's Office (Outside - opposite 6' dryer)
- 1 - Bldg. 31 office (Reserve Center)
- 1 - Bldg. 10 - Semi-Pilot Plant hallway

Any Scott Pak used for an emergency must be taken to the Mask Room so that empty tanks can be replaced with full ones, and the face pieces can be cleaned as soon as possible.

The Safety Department should be notified any time Scott Paks are used during hours other than Monday through Friday, 0800-1700 hours except holidays, by contacting Steve Shaw (534-0546) or Ken Macy, Jr. (874-2013). During regular office hours, call 241, 297, or 322.

Take any used Scott Pak to the Mask Room immediately following any emergency for tank replacement. The EPA Technician will be in the Mask Room during emergencies for tank replacement if necessary.

Used Scott Paks must be returned to their designated location as soon as the tank has been replaced.

ALERT:

The Bendix monitor will sound the area alarm at 25ppm. This is a warning that a higher concentration may exist. If the cause of this alarm is judged as an emergency or indication of a massive VCM release, the local alarm will be sounded.

EVACUATION PROCEDURE - PVC DEPARTMENT

1. All personnel except the Action Team must evacuate operating areas at the sounding of the local or fire alarm.

- A. Operating personnel reporting to Reserve Center - Bldg. 31
- B. Maintenance personnel report to Maintenance Dept. - Bldg. 6
- C. Control Lab Technicians report to Bldg. 31

BOR 012207

EVACUATION PROCEDURE - PVC DEPARTMENT - continued

- D. Shipping personnel report to Bldg. 31
- E. PVC Plant Office personnel report to Bldg. 31
- G. All others (visitors, engineers, etc.) report to Bldg. 31
- 2. Action Team - Personnel who are required to remain the operating area.

PERSONNELRESPONSIBILITIES

- | | |
|--|--|
| A. Shift Supervisors | Overall control of emergency |
| B. Procedures Supervisor | Monitor & report VCM levels.
Monitor unattended reactors.
Monitor evacuation of personnel.
Provide assistance to Shift Supervisor. |
| C. Utility Kettle Operator | VCM source control.
Shutdown equipment as required |
| D. Kettle Operator or Pilot Plant Operator in Affected Area | VCM source control.
Shutdown equipment as required |
| E. Kettle Operator in building not affected | Monitor all reactors in that building.
Shutdown equipment as required |
| 1. If emergency is in Bldg. #1, Kettle Operator in Bldg. 7 East will remain | |
| 2. If emergency is in Bldg. #7, Kettle Operator in Bldg. 1 East (D305-D310) will remain. | |
| F. Production Helper (Transferring in Bldg. 7) | Obtain key for Elm Hill Ave. Gate from Supervisor's Office in Bldg. #7. Close railroad gates and Elm Hill Ave. vehicle gate. Have train engine shutdown. Remain at Elm Hill Ave. Gate and wait for instructions from Supervisor. |
| G. Shift Mechanic | Standby at Shift Maintenance Supply Room in Bldg. 1-East. |
| H. EPA Technician | Mask Room - Change Scott Pak Tanks. |

BOR 012208

EVACUATION PROCEDURE - PVC DEPARTMENT - continued

2. Action Team - continued

PERSONNEL

RESPONSIBILITIES

I. Shipping Dept. Supervisors

Have vehicles that would obstruct Fire Dept. relocated and vehicles shut down.

J. Guard (Polyco)

Shutdown vehicles.
Gate to be unlocked but closed to control "unwanted" emergency vehicles.
Proceed to guard shack and stop to relocate all incoming traffic to Polyco Parking lot.
Coordinate communications at extension 279.

3. Shutdown

A. Kettle Operators/Pilot Plant Operators

Stop charging reactors and close charge valves. Stop reactor degassing but do not enter building to stop. Isolate all reactors.

B. Helpers

Stop transfers. Shut off transfer pump(2) and close reactor discharge valves.

C. Helper

Shutdown rail car unloading operation. Stop compressors or pump(s).

D. Dryer Operator

Ensure that Fire Doors between reactor and dryer areas are closed.

E. If equipment shutdown is required involving additional people, they will be directed to do so by their Shift Supervisor (including mask requirements) using the plant phone system (extension 214) to Bldg. 31.

4. Reserve Center

BOR 012209

A. Control Lab Technician will be a communicator for the Reserve Center. He will be informed (extension 214) by the Shift Supervisor above special needs such as Fire Department Personnel, ambulance or additional Supervisors.

B. Control Lab Technician will inform personnel at the Boiler House that an emergency condition exists in the PVC Dept.

C. Control Lab Technician will record names of all personnel who report to the Reserve Center, Bldg. 31.

5. "All-Clear"

- A. The VCM concentration will be checked in adjacent operating areas by the Supervisor before sounding the "All-Clear" signal.
- B. The "All-Clear" signal is the same for all alarms (4-4-4).
- C. The Supervisor shall determine that the VCM concentration is under 25ppm before sounding the "All-Clear" signal.
- D. All evacuated personnel will report to their normal job station using necessary respiratory equipment.

6. Medical Attention

- A. Anyone exposed to emergency conditions involving VCM exposure will receive medical attention as soon as practical (Report to medical unit as assigned by Supervisor if during normal 0800-1700 hours, Monday-Friday work week or beginning or end of next shift.)
- B. Anyone coming into skin contact with liquid VCM will receive immediate medical attention either at the Medical Center or Leominster Hospital.

BOR 012210

RCRA CONTINGENCY PLAN - NOTIFICATION OF EMERGENCY COORDINATOR

The following people should be contacted in case of an emergency:

<u>EMERGENCY COORDINATOR</u>		<u>Home Phone</u>
M.R. Thorsen	Plant Manager	554-6554
 <u>ALTERNATE</u>		
D.L. Young	PVC Prod. Mgr.	554-9433
R.R. Underwood	Polyco Prod. Supt.	422-7212
K. Macy, Jr.	Safety Supervisor	874-2013
A.C. Mendelsohn	Chief Maint. Eng.	537-0480

There is no clear definition of just what constitutes an emergency under RCRA. Therefore, the following will be used:

Emergency for RCRA contingency plan:

1. "A massive uncontrolled release of hazardous material into the air, soil, or surface water threatening the environment or human health."
2. A fire
3. An explosion

In the event M.R. Thorsen is not contacted, the alternate is to contact one of the following individuals and notify Operation Alert, 614-457-5200, if appropriate:

H.R. Jepsen, Jr.	829-5382
W.F. Gabel	779-5106
N.M. Blackman	534-4766

BOR 012211

WASTE HANDLING PROCEDURE

Objective: To define steps to be used while accumulating waste material in each department and while transporting the material to the staging area south of Bldg. 31.

Scope: This procedure applies to all waste that cannot be placed in trash dumpsters.

Personnel: A. RCRA Site Staff Members are required to monitor waste generated in their departments until such time as it leaves the site for legal disposal.

K. L. Macy, Jr.	- RCRA Site Coordinator
K. L. Macy, Sr.	- RCRA Site Functional Supervisor
D. L. Young	- RCRA Site Staff Member - PVC
R. R. Underwood	- RCRA Site Staff Member - Polyco
A. C. Mendelsohn	- RCRA Site Staff Member - Maintenance
J. E. Phillips	- RCRA Site Staff Member - Control Lab, Shipping
S. Farrington	- RCRA Site Staff Member - Bldg. 10
G. Martin	- RCRA Site Staff Member - Pilot Plant, Semi-Pilot Plant

B. The following individuals are functionally responsible for any movement of waste generated in their departments to the hazardous waste storage area:

J. Michaels	- Shift Supervisor - PVC
S. Foster	- Shipping
H. Conklin	- Polyco
R. Caron	- Maintenance
L. DiRusso	- Q. C. Labs.
G. Martin	- Development

I. General Guidelines - All Waste Substances

- A. Trash suitable for placing in trash dumpsters will not be mixed with other waste materials and will not be brought to the staging area.
- B. Waste materials will be accumulated in sound metal drums only, preferably in an original shipping container for that material.
- C. While waste is being accumulated in each department, drums will be maintained so as to prevent the introduction of water into the container.
- D. Different types of waste material will not be mixed in individual drums.
- E. Individual drums of waste will not be accumulated or stored for longer than 70 days in the department. The date of start of accumulative will be marked on each drum.

BOR 012212

I. General Guidelines - All Waste Substances (continued)

F. Prior to transport to the staging area, all bungs and/or lids will be secure on all drums.

G. Intraplant Transport Control Card (See Attachment #1)

1. All waste material transported to the staging area will be accompanied by an Intraplant Transport Control Card, color-coded by department.
2. The card will be completely filled in (except for the bottom tear-off portion) and signed by the individual functionally responsible for the movement of waste in the department.

Particular attention should be given in identifying the content of the container. For example, a drum of "Unstripped PVC Resin" should be identified as such and not just "PVC Resin" or "Waste Material".

3. The number on the card will be placed on the metal drum with a marking kit which will be provided.
4. When material is transported to the staging area, the control card will either be given to the person responsible for that area or placed in a receptacle which will be provided for that purpose.
5. The person responsible for the staging area will acknowledge receipt by signing the bottom tear-off section which will be returned to the individuals in each department as listed below:

PVC Department	- D. Young
Polyco Department	- R. Underwood
Maintenance	- C. Mendelsohn
Q. C. Labs.	- J. Phillips
Development	- S. Farrington
Pilot Plant	- G. Martin

6. The stub will be attached to the bottom portion of the Generator File Sheet (see Attachment #2) and maintained in a file.
7. Personal protective equipment requirements while handling waste materials will be the same as those used in the plants when handling the material prior to its becoming a waste.

1 BOR 012213

II. Specific Waste Handling Procedures

A. PVC Product Waste

1. The following materials will be accumulated in separate containers whenever possible.
 - a. PVC chips and chunks
 - b. Unstripped resin
 - c. Stripped resin
2. If unstripped material is mixed with stripped material, the entire container must be considered as unstripped PVC waste.

B. Polyco Product Waste

1. The following material will be kept separate whenever possible.
 - a. Reactor or other vessel scapings
 - b. PVC Latex
 - c. All other Polyco product waste

C. Waste Chemicals or Waste Oil

1. Chemicals will not be mixed in individual drums.
2. Different types of waste oil will not be mixed in individual drums.
3. A minimum of 4" head space will be maintained in each drum.
4. Chemicals or oil spills absorbed with Speedy-Dry or other absorbents will be placed in metal drums and identified as such.

III. Empty Metal/Rubber Drums

- A. Supplier returnable drums in the Polyco Department will be stored on pallets south of Bldg. 24 until picked up by the supplier.
- B. All other metal drums will be transported to the staging area for disposition.
- C. Lids and/or bungs will be secure.
- D. An "EMPTY" tag will be attached to each drum

BOR 012214

NOTE: Any questionable situation encountered concerning the movement, and/or disposal of any substance, material, chemical, oil, etc. on the site will be brought to the attention of the RCRA Site Coordinator (Safety Supervisor) for clarification and assignment.

INTRA-PLANT TRANSPORT CONTROL CARD



BORDEN, INC.
LEOMINSTER, MA

SPP

Nº 00500

DATE _____

DEPARTMENT _____

DISPATCHER _____

SUBSTANCE _____

DATE, STORAGE BEGAN _____

SIGNATURE _____

SPPNº 00500

TRANSPORT DATE _____

RECEIVED AT STAGING BY _____

The control cards will be issued with departmental color coding and prefix letter.

Gold	-	M	=	Maintenance
Red	-	PVC	=	PVC
Green	-	PM	=	Polyco
Blue	-	PP	=	Pilot Plants
White	-	SPP	=	Semi-Pilot Plant

BOR 012215

The prefix will be followed by a serial number in ascending sequence.

GENERATOR FILE SHEET

DATE _____

DEPARTMENT _____

DISPATCHER _____

SUBSTANCE _____

CONTAINER NUMBER _____

DATE, STORAGE BEGAN _____

COMMENTS _____

SIGNATURE _____

ATTACH STUB HERE

0-1-9-0

BOR 012216

ATTCH. #2

HAZARDOUS WASTE MANAGEMENT
PERSONNEL TRAINING PLAN

BORDEN Chemical Co.
THERMOPLASTICS Division
LEOMINSTER, MASSACHUSETTS

OBJECTIVE

To insure that personnel whose duties relate to the handling of hazardous waste are trained to carry out those duties in a safe manner and in compliance with all applicable regulations

- TRAINING OVER-VIEW

The principal hazardous material used at the Seomister site is the major raw material, vinyl chloride monomer (VCM). The entire site emergency plans are geared to protecting the employees and the local populace from the effects of a spill or other uncontrolled release of this material. The vinyl chloride operations are covered by both OSHA and USEPA NESHAPS regulations.

As a result, extensive training is conducted in established procedures for the use of vinyl chloride, the prevention of releases, and the response to emergencies. Emission prevention procedures are emphasized.

Procedure manuals detailing operating procedures are maintained in operating areas throughout the site and are available to all operating personnel. These manuals are updated as operating procedures are revised or new ones issued.

Many of the procedures established for vinyl chloride operations also apply to the proportionately smaller amounts of ^{other} hazardous materials used at this location. Additional procedures have been developed and personnel training conducted in areas related to hazardous waste management that are not covered in training for vinyl chloride operations.

BOR 012219

Chemical handbooks for substances used at this

locations are maintained at various work areas. The following information for each chemical is included

- a. Synonyms for each material
- b. Description of chemical
- c. Shipping containers
- d. Hazards associated with the use
- e. Precautions to be followed
- f. First-aid instructions

In summary, training in hazardous waste management has been integrated into the overall site training program and to vinyl chloride operations and instruction pertinent to the proper handling of waste material included.

HAZARDOUS WASTE MANAGEMENT PERSONNEL

<u>JOB TITLE</u>	<u>Responsibility</u>
Environmental Affairs Manager Regulatory Affairs Engineer	Monitor Division-wide Compliance 1. Knowledgeable in REGULATIONS AFFECTING THIS LOCATION 2. MONITOR SITE COMPLIANCE WITH REGULATIONS 3. DIRECT HWM TRAINING PROGRAM
PLANT MANAGER	1. LEOMINSTER SITE COMPLIANCE 2. EMERGENCY COORDINATOR
SAFETY SUPERVISOR	RCRA SITE COORDINATOR
SAFETY PROJECTS TECHNICIAN	DIRECT SUPERVISION OF ALL ACTIVITIES AT WASTE STAGING AREA
PVC PRODUCTION MANAGER PLANT ENGINEER QUALITY CONTROL SUPERVISOR FARRINGTON PILOT PLANT SUPERVISOR	MONITOR STORAGE OF WASTE WHILE IN THE DEPARTMENT

JOB TITLE

Responsibility

PVC DAY SUPERVISOR
DISTRIBUTION SUPERVISOR
MAINTENANCE SUPERVISOR
PVC LABORATORY TECHNICIAN
PILOT PLANT SUPERVISOR

SUPERVISE MOVEMENT OF
WASTE FROM INDIVIDUAL DE-
PARTMENTS TO SITE (WASTE)
STAGING AREA

TRAINING SUPERVISOR

1. INSURE TRAINING COMMITMENTS
ARE MET AND DOCUMENTED
2. MAINTAIN EMPLOYEE TRAINING
RECORDS

ALL SITE PERSONNEL EN-
GAGED IN USE, STORAGE,
HANDLING OF VINYL CHLORIDE
MONOMER

PROPER USE, STORAGE,
HANDLING

TRAINING - PVC DEPARTMENT

GENERAL

I. Shift/Procedures Supervisors

A. Initial Training

1. Initial safety indoctrination.
2. Review of Vinyl Chloride Standard as required by OSHA regulations.
3. Initial over-view of plant operations and responsibility by Production Manager and/or day supervisor.
4. On-the-job training in area of responsibility by an experienced supervisor currently working the position until qualified as determined by Production Manager.

B. Refreshers

1. Annual review of OSHA Vinyl Chloride Standard.
2. Periodic supervisor meetings to cover various facts of plant operation.
3. Supervisors attend or present monthly safety meetings held for hourly personnel in their department.
4. Supervisors attend or present routine process training sessions held for hourly personnel in their department.

C. Special Training

1. Sessions presented by Production Manager or day supervisor following a VCM emission to review circumstances leading up to the emission and steps to be taken to prevent future emissions.

II. Kettle Operator

Kettle Operators are not normally hired externally but are selected through a bidding process from existing plant employees, normally from the Production Helper classification. These personnel are familiar with the purpose and location of reactor equipment through exposure in the Production Helper classification.

A. Initial Training

1. Initial training in reactor operation and control by area supervisor in accordance with established training guidelines (4-8 weeks).
2. On-the-job training under the guidance of Procedures Supervisor for 4 - 8 weeks or until qualified as determined by shift and area supervisor and a test covering reactor operations.

II. Kettle Operator (continued)

B. Refresher Training

1. Scheduled routine process training sessions covering all phases of reactor operation with emphasis on batch control and emission prevention.
2. Scheduled monthly safety meetings.
3. Quarterly audit of each Kettle Operator by a production supervisor to determine if operators are following standard operating procedures. This audit is performed in accordance with a predetermined checklist.

C. Special Training

1. Training sessions held after a VCM emission to review the circumstances leading up to the emission and steps to be taken to prevent future emissions.
2. Sessions on a "needs" basis as changes to equipment or procedures occur.

III. PVC Production Helper

A. Initial Training

1. Initial safety indoctrination.
2. Review of OSHA Vinyl Chloride Standard.
3. Initial over-view of job requirements and responsibilities by area supervisor and shift supervisor.
4. On-the-job training with an experienced Production Helper until qualified as determined by shift supervisor.

B. Refresher Training

1. Scheduled monthly safety meetings.
2. Scheduled process training sessions to review operations in their area of responsibility.

C. Special Training

1. Sessions held on a "needs" basis as changes to equipment or procedures occur.

IV. Maintenance Mechanics

A. Initial Training

1. Initial safety indoctrination.
2. Review of OSHA Vinyl Chloride Standard.
3. Initial over-view of job requirements and responsibilities by Maintenance Superintendent.
4. On-the-job training with an experienced mechanic until qualified to perform the duties of a shift mechanic as determined by a Maintenance Supervisor.

IV. Maintenance Mechanics (continued)

B. Refresher Training

1. Scheduled monthly safety meetings.
2. Routine on-the-job training to gain experience in new areas.
3. Training programs in off-duty hours at trade schools or seminars in skills such as welding.
4. Presentations by vendor representatives in the repairs of their equipment.

C. Special Training

1. Sessions held after VCM emissions that were in any way attributable to equipment malfunctions to review the circumstances leading up to the emission and steps to be taken to prevent future emissions.

V. EPA Technicians

A. Initial Training

1. Initial safety indoctrination.
2. Review of OSHA Vinyl Chloride Standard.
3. Over-view of job requirements and responsibilities and EPA regulations subject to compliance by this location by EPA Coordinator.
4. Operation of equipment that will be used in compliance effort--portable detectors and fixed monitor--by EPA Coordinator.
5. Reports required as a result of compliance requirements.
6. On-the-job training with an experienced EPA Technician until qualified as determined by EPA Coordinator.

B. Refresher Training

1. Monthly safety meetings.
2. Attendance at monthly process training sessions.
3. Scheduled sessions to upgrade the technicians knowledge in plant equipment and operations.

NOTE: Training for personnel in the Polyco Department is essentially the same as listed for the PVC Department but is not itemized in this report.

TRAINING RELATED TO HAZARDOUS WASTE MANAGEMENT

I All operations personnel are included in the following training sessions

A. New Employee Orientation

1. Review of OSHA Vinyl Chloride Standard including the hazards associated with its use
2. Emergency Procedures
3. Respiratory Protection Equipment Use
4. Purpose of VCM monitoring systems and personnel response to alarms
5. Tocal and Fire Alarm Response
6. Spill prevention and reporting
7. Review of safety handbook

B. Initial Training in Department

1. Chemical handling safety
2. Review of departmental emergency procedures
3. Location of VCM alarms in the department and proper response

C. On-Going Training

BOR 012226

Scheduled one hour process training sessions which include the following

1. Annual review of OSHA Vinyl Chloride Standard and EPA compliance requirements
2. Emergency Procedures
3. Respiratory Protection Use
4. VCM Emission Prevention Procedures
5. Plant Alarm systems
6. Chemical handling
7. Fire Extinguisher Use
8. Hazardous Waste Management - Regulations and Compliance
9. Organic Peroxide Fire Safety

II Training is conducted for personnel in supervisory capacities who are directly involved in the accumulation, storage, or movement of hazardous waste. Included in these sessions is

1. Status of compliance requirements - new or revised regulations
2. Problem areas and solutions
3. Question and Answer session

III Management personnel responsible for directing compliance efforts attend seminars sponsored by educational or industrial organizations to update their knowledge and understanding of Hazardous Waste Management requirements applicable to this location.

Training Documentation

Individual attendance at all training sessions is documented on a standardized training record which includes, the date of the session, topic, material covered, name of the instructor, and names of personnel attending. Information from these forms is transferred to individual employee training cards. All records are maintained in the training supervisor's office.

As of the date of this plan, training is up-to-date and complete.

Procedures Related to Hazardous Waste Management

1. Waste Handling Procedure
2. Emergency Plan
3. Vinyl Chloride Monitoring and Alarm System
4. RCRA Contingency Plan
5. Fire and Local Alarm Locations

Other sources of training material used but not included in this plan are

1. Plant Operating Procedures
2. Federal, State, Local Regulations
3. Industry or Government produced Films and/or Slides

Examples: Anatomy of a Crisis
Right to Know ???