

**ABERDEEN CHEMICAL PLANT SAFETY AND HEALTH MANUAL
ABERDEEN, MISSISSIPPI**

SUBJECT: Hazardous Waste Operation and Emergency Response

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VISTA

I. PURPOSE

The purpose of this program is to provide a means of preparation for addressing operations involving emergency response to releases of hazardous substances. It specifically addresses OSHA's Hazardous Waste Operations and Emergency Response (HAZWOPER) standard. The HAZWOPER standard applies to the Aberdeen facility per section 1910.120 (a)(1)(V) which covers emergency response operations for releases of, or substantial threat of, releases of hazardous substances. Also, per paragraph (a)(2)(iv), compliance with paragraph (q) only is required.

II. Safety and Health Program

The Aberdeen facility maintains a written safety and health program. It includes specific procedures for the protection of personnel and property, as well as procedures for safety and health program management. The program contains those procedures specifically required by HAZWOPER, as well as other procedures deemed necessary for safe plant operation.

III. Hazard Communication

The Aberdeen facility has a written Hazard Communication Program. This program has been implemented and communicated to all employees and contractors.

IV. Medical Surveillance

The Aberdeen facility provides a medical surveillance program for its employees. All employees are required to undergo a complete physical examination upon employment. In addition, a complete physical examination is offered annually and required every three years. Upon termination or reassignment to an area or job where the employee is not covered by the HAZWOPER standard, another physical is required. A complete physical examination for periodic medical surveillance consists of the following:

- Complete Medical History Questionnaire*
- Anthropometry (body measurements)
- Vision
- Tonometry
- Audiometry
- Spirometry
- Chest X-Ray
- Electrocardiogram
- Hematology With Differential (Complete Blood Count)*
- Urinalysis*
- Hemocult
- Blood Lead (Lab, Compound, Maintenance Personnel)*
- Hands On Examination and Results Communication by a Licensed Physician*
- Trend Analysis*
- SMAC (Liver Function Test and Specialized Blood Testing)*
- Lysid Profile (electrolyte profile)

*Designates all interim physical examination tests. These are offered to all employees employed in manufacturing involving vinyl chloride for more than ten years. They are offered every six months.

Employees who are injured or show symptoms of illness due to overexposure during an emergency are to be transported to and treated by a licensed physician. As soon as possible thereafter, the individual is to undergo a complete physical examination as outlined above.

V. Personal Protection Equipment

Protective equipment requirements are covered in the Plant Safety and Health Manual and operating procedures as well as in the Plant Emergency Plan for emergency use.

VI. New Technologies

The Aberdeen facility utilizes the technology that offers its personnel adequate protection against the hazards associated with emergency operations. Safety and environmental personnel maintain an awareness of new technology that could provide greater protection to employees or the environment. It is the responsibility of safety and/or environmental personnel to evaluate new methods, equipment, or materials used for employee or environmental protection before those items are put into service.

VII. Training

A. Initial Training

1. First Responder (Awareness Level)

First Responders (awareness level) are those personnel who may witness or discover a hazardous substance release and who are trained only to initiate emergency response to the incident. These include office personnel, process engineers, guards and warehouse personnel.

Initial training requirements for first responders are as follows:

- Fire Training
- NESHAP, RCRA, and TSCA Training
- VCM and Lead Health Education
- Hazard Communication
- Personal Protection Equipment
- Respiratory Protection
- Hearing Conservation
- Lock/Tagout Procedures

VII. Training - Continued

A. Initial Training - continued

2. Hazardous Materials Technicians

Hazardous materials technicians are those personnel who respond to a release or potential release for the purpose of stopping it. All Operations and Maintenance personnel (hourly and salaried) are in this category. Their initial training is for a minimum of 24 hours and includes the following:

- Fire Training
- NESHAP, RCRA, TOSCA
- Spill and Leak Response
- Emergency Response Procedures
- VCM and Lead Health Education
- Hazard Communication
- Personal Protective Equipment
- Respiratory Protection
- Back Injury Protection
- First Aid
- Fork Truck Training
- Hearing Conservation
- Security Procedures
- Power Failure Procedures
- Chlorine Emergencies
- Ladder and Scaffold Usage
- Hand Tools
- Lock/Tagout Procedures
- Hazards of Inert Gases
- Monitoring Equipment Use (HNU)

3. Hazardous Materials Specialists

Hazardous Materials Specialists are those personnel who respond to an incident with Hazardous Materials Technicians. The Hazardous Materials Specialist is required to have a more specific knowledge of various hazardous materials and may act as site liaison with government authorities. The Compound Operations Supervisor, Chief Plant Chemist and Yard Supervisor are considered to be in this category. They are required to have a minimum of 24 hours training on hazardous response.

VII. Training - Continued

A. Initial Training - continued

4. Incident Commanders

Incident Commanders are those personnel who assume control of an incident scene in the event of a spill or release. The Incident Commander is required to have a specific knowledge of chemicals and their hazards and abatement of spills and releases. The Vinyl Operations Superintendent and Safety Director fall into this category. They are required to have a minimum of 24 hours hazardous materials technician training and receive additional training as follows:

- Emergency Management
- Emergency Reporting
- Logistics and Support Personnel
- First Aid and CPR

B. Refresher Training

Annual fresher training is provided for all personnel. This training is a minimum of 8 hours and consists of the following:

- Fire Training
- NESHAP and RCRA
- Emergency Response Procedures
- VCM and Lead Health Education
- Hazard Communication
- First Aid
- Back Injury Prevention
- Respiratory Protection

C. New Employee Orientation

All new employees are given an initial orientation to familiarize them with plant safety and health policies and procedures. This orientation is documented in the "New Employee Orientation Training" manual located in the Safety Department's offices. A new employee may not enter the plant unaccompanied by a trained Vista employee until this orientation is complete.

VII. Training - Continued

D. Trainers

Plant personnel who have completed training on a subject they are expected to teach and have experience in teaching the subjects are considered approved trainers for initial and refresher training. These include all Hazardous Materials Specialists and qualified Incident Commanders, the Safety Supervisor, the Safety Inspector and the Plant Nurse.

VIII. Contractors

When contractors are utilized to respond to clean-ups or other post incident activities where personnel may be exposed to contaminated materials, those contractors will certify that their personnel are trained to the level consistent with the work they are to perform.

Certain skilled contractor personnel (i.e., heavy equipment operators) needed for immediate support activities need not be certified as receiving HAZWOPER training. However, they will be briefed before performing the work as to the chemical hazards involved, any specific hazards and other pertinent safety precautions. The Vista supervisor responsible for the job is responsible for ensuring that these briefings take place.

Some contractors are in the plant on an everyday basis and may be considered to be, and utilized as, clean-up personnel in the event of an incident. These contractors receive training in the following subjects:

- Emergency Response Procedures
- Respiratory Protection
- Hazard Communication
- VCM and Lead Health Education
- Contractor Orientation

All other training may be required based on the material or situation. If so, training will be provided before clean-up operations begin.

IX. Emergency Response

Specific emergency response procedures are contained in the plant's Emergency Response Plan.

X. Emergency Drills

Emergency drills will be conducted at least quarterly. These drills will simulate emergencies and potential emergency situations that may be encountered in the plant. They will be utilized to train plant personnel as well as test the response to an emergency. A post-drill critique will be conducted and a report will be issued with action items included. If appropriate, outside agencies such as the police or fire departments will be invited to participate in the drill and critique. In some cases, a table top drill may be used as a training tool.