



Interoffice Communication

To RAC-RHG-DKW-PCG-WAM ~~SEA~~ DDZ-DDP

From R. D. Gamblin

Date September 10, 1976

Subject LCCP IN-PLANT RESPONSE PROCEDURE FOR PLANT EMISSION CONTROL

The in-plant response procedures for handling of reported exposures to employees will be issued to all employees on September 17, 1976. It will be the responsibility of each Department Head to advise his appropriate supervisory personnel as to their duties.

If you have any questions or require assistance, please contact Jack Cearley.

R. D. Gamblin

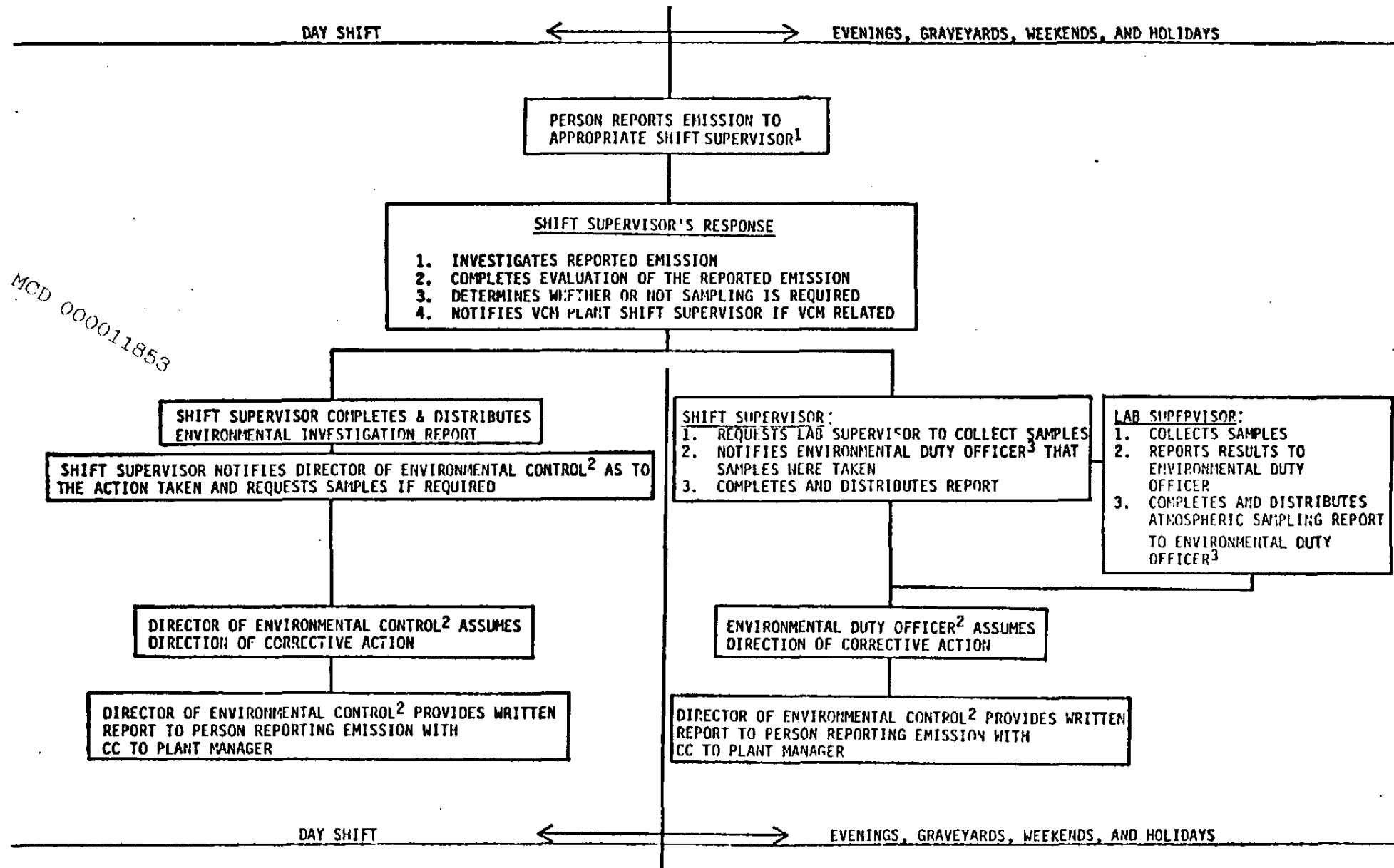
Responsive to 156
Ant. #8 - Plant
Policy, Emission
Control

13 pages

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LCCP IN-PLANT RESPONSE PROCEDURE FOR

PLANT EMISSION CONTROL



¹Contact Director of Environmental Control if Shift Supervisor is unavailable.

²Contact Safety Director if Director of Environmental Control is unavailable.

³A duty schedule will be posted weekly designating employee assigned responsibility

LCCP IN-PLANT RESPONSE PROCEDURES FOR PLANT EMISSION CONTROL

MONDAY THROUGH FRIDAY 7:30 AM - 4:30 PM

1. Employee notifies the appropriate LCCP Shift Supervisor of an emission. If the LCCP Shift Supervisor is unavailable, then the ~~Director of Environmental Control~~ *Safety Director* will be contacted.
or the Deputy Safety Duty
2. LCCP Shift Supervisor proceeds to the location of the reported emission, accompanied by the employee reporting the emission if possible.
3. LCCP Shift Supervisor evaluates the situation and determines ~~whether or not sampling is required~~ *if any immediate precautionary measures are necessary with regard to employees. If so they are started immediately.*
4. LCCP Shift Supervisor notifies the VCM Plant Shift Supervisor if he concludes the emission is being emitted from the VCM Plant. If the VCM Plant Shift Supervisor is unavailable, then the VCM Chief Operator will be contacted.
5. If the emission is determined to originate from the LCCP, the LCCP Shift Supervisor, if applicable, will take immediate corrective action to reduce and/or eliminate the emission. This corrective action refers to such items as: open valves, leaking connections, a ruptured line, etc.
6. LCCP Shift Supervisor notified Director of Environmental Control as to the action taken and requests samples if required. If the Director of Environmental Control is unavailable, then the Safety Director will be contacted.
7. LCCP Shift Supervisor completes and distributes the Environmental Investigation Report.
8. Director of Environmental Control assumes direction of any corrective action required. If the Director of Environmental Control is unavailable, then the Safety Director will assume this responsibility.
9. If necessary, Director of Environmental Control or Safety Director and Quality Control Chemist will collect samples.
10. If the emission is being emitted from the VCM Plant, then the sample(s) will be delivered to the Chief Chemist of the VCM Lab for GC analysis.
11. VCM Chief Chemist or VCM Safety Director reports the results of the analysis to the Director of Environmental Control. If the Director of Environmental Control is unavailable, then the Safety Director should be contacted.

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When an emission begins in an operating unit, the call out procedure listed in the Emergency and Incident Management Plan will be initiated by notifying the Guard to make the call out.

12. Director of Environmental Control or Safety Director reports the results of samples analyzed in the LCCP Lab to the VCM Shift Supervisor and VCM Safety Director if the VCM Plant is affected.
13. Director of Environmental Control or Safety Director coordinates with LCCP Plant personnel and VCM Safety Director to bring the emission under control if LCCP related.
14. If the emission is from the VCM Plant, the VCM Safety Director will coordinate with VCM Plant personnel and the LCCP Director of Environmental Control or Safety Director to bring the emission under control.
15. Director of Environmental Control or Safety Director provides a written report to the employee who reported the emission with a copy to the Plant Manager. If VCM related, a copy will be sent to the VCM Plant Manager.

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LCCP IN-PLANT RESPONSE PROCEDURES FOR PLANT EMISSION CONTROL

EVENINGS, GRAVEYARDS, WEEKENDS, AND HOLIDAYS

1. Employee notifies the appropriate LCCP Shift Supervisor of an emission.
2. LCCP Shift Supervisor proceeds to the location of the reported emission accompanied by the employee reporting the emission if possible.
3. LCCP Shift Supervisor evaluates the situation and determines whether or not sampling is required.
4. LCCP Shift Supervisor notifies the VCM Plant Shift Supervisor if he concludes the emission is being emitted from the VCM Plant. If the VCM Plant Shift Supervisor is unavailable, then the VCM Chief Operator should be contacted.
5. If the emission is determined to originate from the LCCP, the LCCP Shift Supervisor, if applicable, will take immediate corrective action to reduce and/or eliminate the emission. This corrective action refers to such items as: open valves, leaking connections, a ruptured line, etc.
6. If determined as necessary, the LCCP Shift Supervisor requests the LCCP Lab Supervisor to collect samples in the area of the reported emission.
7. If VCM related, then the Lab Supervisor will deliver the sample(s) to the VCM Shift Supervisor for analysis.
8. LCCP Shift Supervisor notifies the Environmental Duty Officer that sample(s) were taken. Duty schedules designating the name of the employee serving as Environmental Duty Officer will be posted weekly.
9. VCM Shift Supervisor reports the results of the analysis to the LCCP Lab Supervisor. The results of sample analysis run by the LCCP Lab will be reported as soon as possible to the VCM Shift Supervisor by the LCCP Lab Supervisor if the VCM Plant is affected.
10. Laboratory Supervisor reports the results of the analysis to the Environmental Duty Officer as soon as the analyses are completed and the results received.
11. LCCP Shift Supervisor completes and distributes the "Environmental Investigation Report" and the Laboratory Supervisor completes and distributes the "Atmospheric Sampling Report."

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12. Environmental Duty Officer assumes direction of any corrective action necessary in the LCCP. If VCM related, the Environmental Duty Officer will contact the VCM Shift Supervisor and VCM Safety Director. The VCM Safety Director or his alternate will coordinate corrective actions with VCM Plant personnel and the Environmental Duty Officer. The Environmental Duty Officer or VCM Safety Director will submit the results of any corrective actions taken to the Director of Environmental Control.
13. Director of Environmental Control provides a written report to the employee who reported the emission with a copy to the Plant Manager. If VCM related, a copy will be sent to the VCM Plant Manager.

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CONTINENTAL OIL COMPANY
LAKE CHARLES CHEMICAL COMPLEX

ENVIRONMENTAL INVESTIGATION REPORT

EMPLOYEE _____ TIME _____ AM PM
DATE _____

EMPLOYEE'S DESCRIPTION OF CONDITION _____

SHIFT SUPERVISOR INSPECTION TIME _____ AM PM DATE _____

WIND DIRECTION FROM: _____ WIND SPEED: CALM GENTLE STRONG

EMPLOYEE PRESENT DURING INSPECTION YES NO

SOURCE OF EMISSIONS IDENTIFIED YES NO GIVE SOURCE AND HOW IDENTIFIED:

DESCRIPTION OF EMISSIONS (eg., odor, smell, color, sweet, etc.) _____

ACTION TAKEN:

- | | | |
|---|-----|----|
| 1. VCM PLANT SHIFT SUPERVISOR CONTACTED | YES | NO |
| 2. LCCP LAB SUPERVISOR CONTACTED | YES | NO |
| 3. SAMPLES COLLECTED | YES | NO |
| 4. ENVIRONMENTAL DUTY OFFICER CONTACTED | YES | NO |
| 5. COMMENTS: _____ | | |

6. CORRECTIVE MEASURES: _____

SUPERVISOR ON DUTY

cc: LCCP MGR. - VCM MGR. (IF APPLICABLE)
LCCP PLT. SUPT./TECH. DIR. - ENVIR. CONT. DIR.

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LAKE CHARLES CHEMICAL COMPLEX

ATMOSPHERIC SAMPLING REPORT

REQUEST FOR SAMPLES RECEIVED TIME _____ AM PM DATE _____

LOCATION OF REPORTED EMISSIONS _____

SAMPLES DELIVERED TO VCM PLANT SHIFT SUPERVISOR FOR ANALYSIS YES _____ NO _____

VCM PLANT ANALYSIS RECEIVED TIME _____ AM PM DATE _____

DETECTOR TUBE RESULTS

<u>CHEMICAL</u>	<u>NO. OF STROKES</u>	<u>PPM</u>	<u>TLV</u>	<u>TIME SAMPLED</u>
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____

VACUUM SYRINGE BOMB (GC ANALYSIS)

<u>CHEMICAL</u>	<u>PPM</u>	<u>TLV</u>	<u>TIME SAMPLED</u>
1. _____	_____	_____	_____
2. _____	_____	_____	_____
3. _____	_____	_____	_____
4. _____	_____	_____	_____

WIND DIRECTION FROM: _____

ENVIRONMENTAL DUTY OFFICER CONTACTED YES _____ NO _____ IF YES, TIME _____ AM PM
DATE _____

COMMENTS: _____

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LABORATORY SUPERVISOR ON DUTY

cc: ENVIR. DUTY OFF. - ENVIR. CONT. DIR.

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