

To: Manual Distribution List

From: B. L. Trego
Date: September 1, 1989

Subject: SAFETY AND HEALTH MANUAL UPDATE

Interoffice
Communication

VISTA

Attached is the new Safety Glasses Policy (VSP 12) which will become effective on Friday, September 1, 1989. Also, a new and updated Table of Contents for the Safety and Health Manual is attached.

Remove and Destroy

Existing Table of Contents

Existing Safety Glass Policy (1.410) dated 4/9/85 (or older)

Insert

New Table of Contents, dated 9/1/89

New Safety Glass Policy, dated 9/1/89

Please review the Table of Contents and be sure your manual corresponds with it. If discrepancies exist, contact me for up-to-date copies of policies (at least up-to-date as I have).

I will continue to review and revise policies and get them distributed. Please help me by inserting new and throwing away old policies as requested. We will eventually all have a completed and up-to-date manual.

Bruce

SAFETY AND HEALTH MANUAL DISTRIBUTION

Plant Manager	R. W. Seymour
Plant Superintendent	D. C. Skokna
Safety Director	B. L. Trego
Director of Employee Relations	J. E. Beall
Chief Process Engineer	R. B. Newton
Mechanical Superintendent	D. A. Miller
Operations Superintendent - Vinyl	P. J. Kober
Operations Superintendent - Compound	J. E. Nickerson
Director of Administrative Services	J. E. Little
Chief Plant Chemist	H. G. Coleman
Compound Operations Supervisor	C. L. Worlow
Vinyl Operations Supervisor	D. F. Johnson
Maintenance Superintendent	J. B. Autrey
Environmental Coordinator	F. G. Jeanson
Contract Supervisor	G. A. Morgan
Safety Supervisor	J. V. Uptain
Safety Inspector	J. G. Roberts
Warehouse/Purchasing Supervisor	M. A. Swierc
Quality Control Supervisor	M. R. Kane
Yard Supervisor	L. D. Honeycutt
Plant Accounting	T. L. Cummings
Stores Supervisor	P. A. Wells
Plant Nurse	V. A. Belk
Maintenance Supervisors (3)	F. W. Frantz C. L. Smith M. H. Williams
Plant Manager's Clerk/Typist	R. A. Holloway

PVC PLANT SAFETY & HEALTH MANUAL
ABERDEEN, MS

<u>CONTENTS</u>	<u>POLICY NUMBER</u>	<u>EFFECTIVE DATE</u>
SAFETY & HEALTH MANUAL		
Safety & Health Policy	VSP 001	07/06/87
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Employee Safety Action Requests	VSP 003	07/06/87
Scaffold Safety Rules and Practices	VSP 004	01/01/87
Respiratory Protection	VSP 005	01/01/88
Safety Control Permit System	VSP 006	03/01/88
Confined Space Entry Procedure	VSP 007	03/01/88
Hot Work Procedure	VSP 008	03/01/88
Crane Baskets for Personnel	VSP 009	06/01/87
Transportation		
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Safety Shoe Program	VSP 011	10/01/88
Safety Glasses Policy	VSP 012	09/01/89
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Security Plan	1.260	06/11/86
Equipment Entry Checklists	1.330	10/15/79
Lockout Procedure	1.340	11/27/78
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Plant Safety Reviews	1.360	10/15/79
Hazardous Service Bleeders	1.365	07/08/86
Drum Handling Guidelines	1.370	03/18/83
Empty Drums	1.371	07/08/86
Work Environment Hazard Control Program	1.510	03/16/84
Hearing Conservation Program	1.520	06/01/76
Use and Disposal of Asbestos	1.540	01/01/81

09/01/89

VAB.0001090861

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

VISTA

SUBJECT: Safety Glasses Policy

EFFECTIVE DATE: September 1, 1989

PREPARED BY: *Don L. Tug* **SAFETY DIRECTOR**

APPROVED BY: *W. L. Boyer* **PLANT MANAGER**

I. Purpose

The purpose of this procedure is to establish a minimum standard for protective eyewear in the plant.

II. Policy

Safety glasses with permanently attached sideshields will be worn in all areas of the plant with the exception of office and break areas, restrooms, meeting rooms and control rooms. These safety glasses will be provided by Vista to Vista employees.

As of the effective date of this policy, only safety glasses with permanently attached plastic sideshields will be purchased by Vista at Aberdeen. Wear of existing safety glasses with removable sideshields will be allowed until December 31, 1990. At that time, all employee safety glasses will have permanent sideshields.

III. Responsibility

- a. The Safety Director is responsible for administering the program.
- b. The plant storeroom is responsible for maintaining a supply of non-prescription safety glasses and issuing them to Vista employees.

9/01/89

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III. Responsibility - continued

- c. The plant nurse is responsible for ordering and issuing prescription safety glasses.
- d. The employee, contractor, or visitor is responsible for wearing safety glasses as required.

IV. Procedure

1. Upon entering the plant (through the gate or office door), all employees, contractors, and visitors will wear approved safety glasses. The only exception will be for employees at shift change when safety glasses are not required in a direct route between the gate or back office door and the lockers.

Contractors will wear OSHA approved safety glasses with rigid plastic sideshields when entering the plant gate and all areas of the plant except offices, break areas, restrooms, meeting rooms and control rooms.

2. Non-prescription safety glasses are issued by the storeroom. Tinted or shaded lenses are approved for outside use.
3. Prescription safety glasses will be ordered from a selected assortment and issued by the plant nurse. One pair will be provided to each employee per year at the company's expense. A new prescription must be provided at the employee's expense at the time of the request. Prescription/order forms are in the nurse's office.

If employee safety glasses are destroyed or damaged beyond use or repair, Vista will provide a replacement pair upon approval of the employee's department head. If the prescription is less than one year old, a new one will not be required.

IV. Procedure - continued

Extra pairs of safety glasses may be purchased by the employee through the company in the same manner as above. These glasses will also be from the selected assortment mentioned above.

4. Contact lenses may be worn in the main office, the administrative services offices, and the walkway through the warehouse between these office areas when safety glasses are also worn. They will not be worn in operating areas.
5. Personnel who have a visual acuity of 20/50 or worse and who need to wear full face respiratory protective equipment will be provided, upon request, with glasses and a kit that fits inside the respirator facemask. Contact the plant nurse for more information.

To: Safety and Health Manual Distribution

From: B. L. Trego
Date: May 18, 1989

Subject: SAFETY AND HEALTH MANUAL TABLE OF CONTENTS

Interoffice
Communication

VISTA

Attached is the up-to-date Table of Contents for the Aberdeen PVC Plant Safety and Health Manual. As policies are written or revised they will receive a new Vista Safety Policy (VSP) number. Eventually there will be an alphabetical index included for convenience.

As changes are made to the manual, a revised copy of the Table of Contents will accompany the distribution. This should help to keep your manual current.

Also attached is the Safety Shoe Program which you may not have received during distribution. Please review and insert in your manual.



Bruce Trego
Safety Director

tjs

SAFETY AND HEALTH MANUAL DISTRIBUTION

Plant Manager	R. W. Seymour
Plant Superintendent	D. C. Skokna
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Plant Nurse	V. A. Belk
Maintenance Supervisors (3)	F. W. Frantz C. L. Smith M. H. Williams
Plant Manager's Clerk/Typist	R. A. Holloway

05/15/89

VAB.0001090866

PVC PLANT SAFETY & HEALTH MANUAL
 ABERDEEN, MS

<u>CONTENTS</u>	<u>POLICY NUMBER</u>	<u>DATE</u>
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Confined Space Entry Procedure	VSP 007	12/09/87
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Work Environment Hazard Control	1.510	03/16/84
Program		
Hearing Conservation Program	1.520	06/01/76
Use and Disposal of Asbestos	1.540	01/01/81

ABERDEEN CHEMICAL PLANT SAFETY AND HEALTH MANUAL
ABERDEEN, MISSISSIPPI

SUBJECT: Safety Shoe Program

EFFECTIVE DATE: October 1, 1988

PREPARED BY: *Don L. Tug* SAFETY DIRECTOR

APPROVED BY: *W. L. Seymour* PLANT MANAGER

VISTA

I. Purpose

The purpose of this program is to establish a procedure by which Vista employees assigned to the Aberdeen Plant can obtain approved safety footwear.

II. Policy

Safety footwear is an accepted and practical method of preventing injuries to the lower leg, foot and toes. Preventing those types of injuries is the purpose of this program.

III. Responsibility

The Safety Director is responsible for administering this program. Employees are expected to wear safety shoes when in the operating units, mechanical shops, warehouse, laboratories, or when in any area or performing any job which could result in foot injury.

IV. Eligibility

All personnel assigned to the Vista Aberdeen Plant will receive a \$100 safety shoe credit allotment at the beginning of the fiscal year, October 1. Newly hired employees will receive the same allotment. Safety shoes purchased through this program will be charged against this allotment.

This allotment can be used to purchase safety shoes only. Any amount not used by the end of the fiscal year will be null and void. No carry-overs or credits will be allowed. Any amount over the allotment will be deducted from the employee's paycheck through payroll deduction. Administrative Services will publish a list monthly of safety shoe eligibility.

V. Replacement Shoes

Safety shoes which become damaged or destroyed while performing regular job duties will be replaced. Department Head approval is required. Shoes damaged due to normal wear and tear will not be replaced.

VI. Safety Shoe Selection

Safety shoes may be selected and purchased in the ways listed below:

Option 1 - A mobile shoe van will visit the plant on a routine basis.

Option 2 - Direct order from Hy-Test through catalog sales. A catalog and order forms (attachment I) will be maintained at the main guard gate. Orders to Hy-Test will be placed at the beginning of each month.

Safety shoes authorized for purchase and for wear in the plant will be sturdy, steel-toed shoes with leather uppers. Shoes with cloth uppers or leather uppers that have "breathing" holes are not authorized for wear in the plant. An example of these would be HY-Test's O.T.'s.

9/21/88

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Page 2

Safety Shoe Catalog Order

Name _____

Date _____

SS# _____

Clock # _____

Department _____

Catalog _____

Style # _____

Size & Width _____

Price \$ _____

Signature _____

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A

To: Safety and Health Manual Holders

From: J. V. Uptain
Date: July 31, 1989

Subject: EMERGENCY ORGANIZATION CALL LIST

VISTA

Interoffice
Communication

Attached is an updated version of the Emergency Organization Call List. Please replace the existing one in your Safety and Health manual with this one.

J. V. Uptain
Safety Supervisor

ATTACHMENT B

EMERGENCY ORGANIZATION CALL LIST

When advised by the Shift Supervisor, or his designee, the guard will start calling the names listed below in numerical sequence (rank order) from the appropriate list.

<u>Vinyl</u>	<u>Compound</u>	<u>Utilities</u>
1. Don Johnson 1-256-8279	1. C. L. Worlow 369-8862	1. M. H. Williams 1-963-2796
2. Paul Kober 369-7096	2. Ted Nickerson 369-9235	2. J. B. Autrey 1-329-3365
3. Doug Skokna 1-327-0679	3. Doug Skokna 1-327-0679	3. D. A. Miller 1-356-6274
4. Bruce Trego 1-327-8673	4. Bruce Trego 1-327-8673	4. Doug Skokna 1-327-0679
5. Bob Seymour 369-4412	5. Bob Seymour 369-4412	5. Bruce Trego 1-327-8673
6. J. V. Uptain 369-8109	6. J. V. Uptain 369-8109	6. Bob Seymour 369-4412
7. J. G. Roberts 369-8059	7. J. G. Roberts 369-8059	7. J. V. Uptain 369-8109
8. K. W. Birck 1-329-3039	8. K. G. Akins 1-327-3851	8. J. G. Roberts 369-8059
9. Dean Honeycutt 343-5595		

Attachment B-1 is a Secondary Call List. The personnel to be called by the guard will be identified by any of the above noted Emergency Organization respondents after they arrive on the scene.

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ATTACHMENT B - 1

Mechanical

F. W. Frantz
369-8508

R. E. Polk
1-327-6766

J. L. White
369-2991

W. C. English
1-323-0058

C. L. Smith
369-8398

J. B. Hegwood
1-329-1297

C. A. Clark
369-6255

J. M. Vinoski
1-327-9019

G. A. Morgan
369-6522

J. R. Hamilton
369-8290

M. G. Langford
256-7693

Administrative

Jack Little
1-329-2936

M. A. Swierc
1-327-8229

T. L. Cummings
369-6058

J. E. Beall
1-328-1189

P. A. Wells
343-5160

Process Engineering/Environmental

R. B. Newton
1-328-0904

Frank Jeanson
1-324-2329

C. J. McDonald
369-9465

S. C. Hillman
369-7892

D. A. Moore
1-327-9019

R. H. Sneed
1-329-2368

Vinyl

R. A. Collins
369-6184

B. F. Hawkins
343-8832

A. L. Reeves
369-6919

B. G. King
256-7086

O. C. Pace
256-2830

Lab/Safety

V. A. Belk
369-4416

J. R. Williams
256-3810

B. P. Sizemore
369-7323

D. S. Cox
369-8752

H. G. Coleman
1-327-4895

Compound

A. L. Barr
369-6594

T. L. Noland
1-205-698-9962

J. O. Howell
256-8991

W. J. Davis
369-9181

R. G. Gilreath
343-5406

To: Safety and Health Manual Holders

From: J. V. Uptain
Date: June 20, 1989

Subject: EMERGENCY ORGANIZATION CALL LIST

Interoffice
Communication

VISTA

Attached is an updated version of the Emergency Organization Call List. Please replace the existing list in your manual with this new one.

J. V. Uptain/R.H.

J. V. Uptain
Safety Supervisor

rah

attachment

DISTRIBUTION:

R. W. SEYMOUR
D. C. SKOKNA
B. L. TREGO
J. E. BEALL
R. B. NEWTON
D. A. MILLER
P. J. KOBER
J. E. NICKERSON
J. E. LITTLE
H. G. COLEMAN
C. L. WORLOW
D. F. JOHNSON
J. B. AUTREY
F. J. JEANSON
G. A. MORGAN
J. V. UPTAIN
J. G. ROBERTS
M. A. SWIERC
J. R. WILLIAMS
L. D. HONEYCUTT
T. L. CUMMINGS
P. A. WELLS
F. W. FRANTZ
C. L. SMITH
M. H. WILLIAMS
M. G. LANGFORD
R. A. HOLLOWAY

ATTACHMENT BEMERGENCY ORGANIZATION CALL LIST

When advised by the Shift Supervisor, or his designee, the guard will start calling the names listed below in numerical sequence (rank order) from the appropriate list.

<u>Vinyl</u>	<u>Compound</u>	<u>Utilities</u>
1. Don Johnson 1-256-8279	1. C. L. Worlow 369-8862	1. M. H. Williams 1-963-2796
2. Paul Kober 369-7096	2. Ted Nickerson 369-9235	2. J. B. Autrey 1-329-3365
3. Doug Skokna 1-327-0679	3. Doug Skokna 1-327-0679	3. D. A. Miller 1-356-6274
4. Bruce Trego 1-327-8673	4. Bruce Trego 1-327-8673	4. Doug Skokna 1-327-0679
5. Bob Seymour 369-4412	5. Bob Seymour 369-4412	5. Bruce Trego 1-327-8673
6. J. V. Uptain 369-8109	6. J. V. Uptain 369-8109	6. Bob Seymour 369-4412
7. J. G. Roberts 369-8059	7. J. G. Roberts 369-8059	7. J. V. Uptain 369-8109
8. K. W. Birck 1-329-3039		8. J. G. Roberts 369-8059
9. Dean Honeycutt 343-5595		

Attachment B-1 is a Secondary Call List. The personnel to be called by the guard will be identified by any of the above noted Emergency Organization respondents after they arrive on the scene.

ATTACHMENT B - 1

<u>Mechanical</u>	<u>Process Engineering/Environmental</u>	<u>Lab/Safety</u>
F. W. Frantz 369-8508	R. B. Newton 1-328-0904	V. A. Belk 369-4416
R. E. Polk 1-327-6766	Frank Jeanson 1-324-2329	J. R. Williams 256-3810
J. L. White 369-2991	C. J. McDonald 369-9465	B. P. Sizemore 369-7323
W. C. English 1-323-0058	S. C. Hillman 369-7892	D. S. Cox 369-8752
C. L. Smith 369-8398	D. A. Moore 1-327-6950	H. G. Coleman 1-327-4895
J. B. Hegwood 1-329-1297	Ken Birck 1-329-3039	
C. A. Clark 369-6255	R. H. Sneed 1-329-2368	
J. M. Vinoski 1-327-9019	K. G. Akins 1-327-3851	
G. A. Morgan 369-6522		
J. R. Hamilton 369-8290		
M. G. Langford 256-7693		
<u>Administrative</u>	<u>Vinyl</u>	<u>Compound</u>
Jack Little 1-329-2936	R. A. Collins 369-6184	A. L. Barr 369-6594
M. A. Swierc 1-327-8229	B. F. Hawkins 343-8832	T. L. Noland 1-205-698-9962
T. L. Cummings 369-6058	A. L. Reeves 369-6919	J. O. Howell 256-8991
J. E. Beall 1-328-1189	B. G. King 256-7086	W. J. Davis 369-9181
P. A. Wells 343-5160	O. C. Pace 256-2830	

PJK

SPILL PREVENTION CONTROL
AND COUNTERMEASURE PLAN

August 22, 1986

PREPARED BY:

R. A. Frohreich

R. A. Frohreich

Director of Environmental Control

CERTIFIED BY:

Theodore F. Lyon

Theodore F. Lyon

P. E. MS No. 9680

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

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APPENDIX A	AVAILABLE SPILL CLEAN-UP EQUIPMENT
APPENDIX B	DIKE AND TRENCH INSPECTION REPORT

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

I. INTRODUCTION

Federal regulations require that facilities which could reasonably be expected to discharge oil prepare a SPCC Plan (Spill Prevention, Control and Countermeasure Plan). The intent of the SPCC Plan is to minimize the potential for harmful oil discharges to navigable waters within the U.S. A harmful oil discharge is defined as any oil discharge which causes a visible sheen on or discoloration of, the surface of water. Harmful oil discharges are prohibited by law.

The Aberdeen Plant uses a variety of oils during operations, such as plasticizers, alcohols, lubricants and chemical substances. Most of these oils are handled in diked, curbed or trenched-in areas which drain to the process sewer; however, it is possible that oil could be spilled outside of these areas and subsequently run to the storm sewer. In order to trap any free oil which may have been spilled to the storm sewer, there are concrete basins with underflow baffles upstream from each storm sewer outfall.

All potential spill areas are under plant security. The plant facilities are enclosed in a fenced area, and all the gates are locked except the main gate where a guard is present at all times.

II. PLANT DRAINAGE AND RUNOFF CONTROL

Oily substances are stored or handled at several locations within the plant. The following preventive measures have been taken to minimize the potential for an oil discharge from the plant.

A. Plasticizer Tank Farm

Bulk quantities of plasticizer, alcohol and caustic soda are stored in tanks at the tank farm. The area is enclosed by a three-foot high concrete dike which will contain spills. Oil which is spilled at the tank farm will collect on the surface of the API separator and will subsequently be recovered to the process.

All of the tanks at the tank farm have level gauges. The tank levels are checked daily and recorded on a form. The drains on all of the tanks are either blinded or plugged.

B. Fuel Storage Area

A diesel oil storage tank and a gasoline storage tank are located north of the plasticizer tank farm in a concrete diked area. There is a valve between the plasticizer tank farm and the fuel storage area which can be opened in order to drain the fuel storage pad to the tank farm.

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

II. PLANT DRAINAGE AND RUNOFF CONTROL - Continued

C. Alcohol Unloading Area

Alcohol is unloaded from trucks on the south side of the tank farm. The area around the hookup stations is enclosed by a trench in the roadway which drains to the API separator.

Oil which is spilled at the unloading station in any quantity must be cleaned up immediately. This should be accomplished by washing the spilled oil into the trench with water or cleaning up the spilled oil with sorb all. Failure to clean up oil promptly will result in the spreading of the oil onto the roadway by vehicles.

D. T-450, 460 Area

The area around T-450 and T-460 tanks on the east side of the plasticizer building is enclosed by concrete curbing, and the curbed area drains to the API separator. The two above ground tanks which are located within the curbed area have level gauges which are checked daily and recorded on a form.

E. Plasticizer Reactor Relief Knockout Tank

If a plasticizer reactor were to overpressure or relieve for some reason, the discharge would pass through the plasticizer reactor relief knockout tank. Entrained liquid in the discharge would collect in the tank instead of being discharged to the area around the plasticizer building. Although the tank is normally empty, there is a trench around the tank which drains to the API separator.

F. Large Drum Storage Area

There is a large drum storage area located on the south side of the east warehouse. This area is enclosed by a concrete dike, fenced-in, locked and covered by a roof. There is a valve at the southeast of the dike which can be opened in order to let out rainwater.

G. Waste Oil and Slop Oil Tanks

There are two tanks on the north side of the API separator which are used to store waste oil and oil which has been recovered from the API separator. Both of these tanks are surrounded by a concrete dike, and the diked-in areas drain to the API separator. Each tank has a level gauge.

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

II. PLANT DRAINAGE AND RUNOFF CONTROL - Continued

H. Empty Drum Storage Pad

Empty drums from around the plant are drained and stacked on a concrete pad east of the API separator. The concrete pad is enclosed by a concrete curb, and oily drainage from the pad is collected in a small sump at the north end of the pad. The sump is pumped out to the waste oil storage tank or the API separator as necessary. If the level in the sump becomes too high, the sump and the concrete pad will overflow to the API separator.

I. Lubricating Oil Storage Area

Lubricating oils are stored on a concrete pad east of the truck scales. The pad is surrounded by a trench and a concrete curb, and covered by a roof. There is a drain valve on the south side of the curb which is blanked-off, and is not to be opened under any circumstances. Oil which is collected in this trench must be drummed and transferred to the waste oil sump by the API separator.

J. Drum Storage Areas at Reactor Units

There are small drum storage pads at each of the reactor units which are enclosed by a concrete curb. These areas drain to the process sewer. In the event of a chemical spill within these areas, there is a drain valve which can be closed if necessary.

K. Firewater System Diesel Oil Storage Tanks

There are two small diesel oil storage tanks at the firewater pond deluge building and at pond #5 deluge building. The area under the pond #5 deluge diesel oil storage tanks is contained by a concrete curb; however, if oil is spilled outside of the curbed area the oil will run into the wastewater treatment ponds. The situation at the firewater pond is similar. If diesel oil is spilled outside of the curbing and it runs to the firewater pond, there is an underflow baffle which will keep the oil from being discharged from the plant.

L. Emergency Generator Diesel Oil Storage Tank

There is a diesel oil storage tank for the emergency generator located just east of the emergency generator building. The area under the tank is concrete and there is a concrete dike to contain any spillage. There is a roof over the tank to prevent rainwater from entering the diked area.

M. The Sphere and The Bullets

The sphere and the bullets are surrounded by a concrete dike, which will contain VCM that may be spilled during a massive VCM release.

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLANII. PLANT DRAINAGE AND RUNOFF CONTROL - ContinuedN. Storm Water Runoff

If there is an oil spill outside of the above areas, there is a possibility that the spill could reach the storm sewer instead of the process sewer. In order to prevent oil from being discharged from the plant via a storm sewer, there is a concrete basin upstream from each storm sewer outfall. These basins have two underflow baffles which will trap any free oil which may get into the stormwater runoff. Oil which collects on the basins must be cleaned up as soon as possible, since the oil will eventually become entrained or dissolved in the stormwater.

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

III. INSPECTIONS

A. Dikes and Trenches

All dikes and trenches around potential oil spill areas are to be inspected semi-annually by the Director of Environmental Control. The attached inspection form must be completed and filed during this inspection. Cracked dikes or plugged trenches must be promptly repaired or cleaned out as necessary.

B. Storm Sewer Basins

The storm sewer concrete basins must be inspected for oil at least once per week by the Director of Environmental Control. If oil is observed on the basins during these inspections, or during an inspection by any other employee, the Director of Environmental Control and the Contract Supervisor must be notified. The oil must then be cleaned up promptly and the source of the oil identified if possible.

IV. SPILL CLEANUP

In the event of an oil or chemical spill, efforts must be made to prevent the spill from leaving the plant's boundary. Any employee who observes a spill must take immediate action to control the spill, and if the spill is too large to control by ordinary means, the Supervisor of the affected area must be contacted. The Supervisor will make an evaluation of the spill and will notify the Operations Supervisor or Superintendent, who will coordinate cleanup of the spill. If the spill enters a storm sewer or approaches a plant boundary, the Director of Environmental Control must be contacted for assistance.

Spills which occur to grade should be contained with whatever materials are available and the spill area should be roped off. Spills which enter the plant's sewers should be cleaned up whenever the spill material reaches the concrete settling basins. Sorbent booms should be placed at the storm sewer outfall if oil is spilled to the storm sewer. When spilled material is cleaned up, the necessary Safety and Environmental disposal procedures must be used. If there is any doubt concerning the safe and proper cleanup and disposal of certain materials, the Director of Environmental Control must be contacted for assistance.

V. REPORTING

If there is any visible oil discharge from the plant, the incident must be reported to the Mississippi Department of Natural Resources and the National Response Center. The following personnel are authorized to report oil discharges from the plant. The report must be made as soon as possible after becoming aware of the spill, but no later than within 24 hours of the spill.

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

V. REPORTING - Continued

Director of Environmental Control	Dick Frohreich	1-328-3628
Chief Process Engineer	Veldon Messick	1-327-0741
Senior Process Engineer	John Cole	1-323-5135
Plant Superintendent	Joe Ware	1-327-5018
Plant Manager	John Friend	369-9377
Vinyl Operations Superintendent	Dave Hollis	369-6422
Compound Operations Superintendent	Paul Kober	369-7096
Mechanical Superintendent	Ted Lyon	1-329-2721

The following numbers may be useful when reporting an oil spill:

MDNR

Between 7:30 a.m. - 4:30 p.m. call: (601) 961-5171

After 4:30 p.m., weekends and holidays call: (601) 961-5340

Earl Mahaffey	Engineering in Training
Bob Rogers	Emergency Coordinator
Jerry Cain	Section Chief

National Response Center

All Hours 1-800-424-8802

VI. TRAINING

Employees engaged in the operation and maintenance of equipment which could reasonably be expected to spill oil are to be trained on the SPCC Plan.

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

APPENDIX A

AVAILABLE SPILL CLEANUP EQUIPMENT

- (1) VACUUM TRUCKS - Vacuum trucks are available from the following truck service companies:

A. RDB Trucking - LOCATION: Aberdeen, MS
PHONE: 369-9383
ARRIVAL TIME: 15 Minutes

B. G. B. Smith, Inc. - LOCATION: Hattiesburg, MS
PHONE: 649-1220
ARRIVAL TIME: 3.5 - 4 Hours

C. Industrial Maintenance Cleaning Contractors Inc. (I.M.C.C.I.)
LOCATION: Bessemer, AL
PHONE: 205-428-0621
ARRIVAL TIME: 6 Hours

D. C. H. Heist Company - LOCATION: Mobile, AL
PHONE: 205-456-8477
ARRIVAL TIME: 6 Hours

- (2) SKIMMING PUMP - Skimming pumps available from RDB Trucking.

- (3) ALUMINUM BOAT - An aluminum boat is available from the waste treatment ponds.

- (4) Spill booms, rolls and pads of oil sorbent materials are available from storeroom to remove oil from the creek or settling pits.

- (5) Sorbent materials for liquid spills on concrete areas or the ground are available from the storeroom.

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLANAPPENDIX BSPCC PLAN DIKE AND TRENCH INSPECTION REPORT

Date: _____

Inspector: _____

ItemStatus

Plasticizer Tank Farm:

VCM Tank Farm Dike:_____
Lagoons Acid Dike:_____
Alcohol Unloading Area:_____
T450, 460 Area:_____
Diesel Oil Storage Areas:_____
Waste Oil and Slop Oil Dikes:_____
Empty Drum Storage Pad:_____
Lubricating Oil Storage Area:_____
Reactor Drum Storage Pads:_____
Large Drum Storage Area By East Warehouse:_____
Plasticizer Reactor Relief Knockout Tank:_____
Firewater System Diesel Oil Storage Tanks:_____
Emergency Generator Diesel Oil Storage Tank:

A

SPCC PLAN AND TRENCH INSPECTION REPORT
Page 2

The following problems should be checked for and noted, along with any other obvious discrepancies:

1. Cracks or damage to dike walls, curbing.
2. Trenches that are full of solid debris and will not drain.
3. Liquid-full trenches or curbed areas.
4. Obvious signs of oil spillage outside of the contained area.
5. Drain valves that are open where the area to be drained does not tie into the process sewer system.
6. Write "W.O. Written" under status column after a work order has been written to correct a discrepancy.

A

APPENDUM TO S.P.C.C. PLAN
RCRA HAZARDOUS WASTE CONTINGENCY PLAN

July 21, 1986

PREPARED BY:

R. A. Frohreich
R. A. Frohreich
Director of Environmental Control

CERTIFIED BY:

Theodore F. Lyon
Theodore F. Lyon
P. E. MS No. 9680

APPENDUM TO S.P.C.C. PLAN

RCRA HAZARDOUS WASTE CONTINGENCY PLAN

Contents

- I. INTRODUCTION
- II. EMERGENCY COORDINATOR
- III. EMERGENCY PROCEDURES
- IV. ARRANGEMENTS WITH LOCAL AUTHORITIES
- V. AREAS COVERED BY CONTINGENCY PLAN
- VI. REPORTING
- VII. AMENDING EMERGENCY PROCEDURES
- VIII. EQUIPMENT

RCRAHAZARDOUS WASTE CONTINGENCY PLAN**I. INTRODUCTION**

Section F, Subpart D (402.7-50 to 402.7-56) of the Mississippi Hazardous Waste Management Regulations require an owner or operator of a hazardous waste management facility to have a contingency plan for his facility. The Contingency Plan must be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned release of hazardous wastes to the air, soil, or surface waters. The plan includes provisions for an emergency coordinator who will assess the possible hazards of any spill, fire or explosion of hazardous waste. The Emergency Coordinator will implement the Contingency Plan if he deems the emergency situation threatens human health or the environment.

Hazardous wastes which are managed at the Aberdeen Plant are waste phthalic anhydride, API sludge, waste barium, cadmium or lead stabilizers, and any waste mixtures containing significant amounts of barium, cadmium, or lead stabilizers. The areas of the plant which are covered under the Contingency Plan are the hazardous waste drum storage area, the API separator and slop oil tank.

II. EMERGENCY COORDINATOR

At all times, there must be at least one employee on the facility premises or available to respond within a short period of time to an emergency situation involving hazardous wastes. This person has the responsibility for coordinating hazardous waste emergency response measures.

The Emergency Coordinator must be:

1. Familiar with the plant layout.
2. Familiar with the location and characteristics of the hazardous wastes handled.
3. Familiar with hazardous waste related operations and activities at the plant.
4. Familiar with hazardous waste related records within the plant.
5. Familiar with all aspects of the plant's Contingency Plan.
6. Have the authority to commit the resources necessary to implement the Contingency Plan.

HAZARDOUS WASTE CONTINGENCY PLAN

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II. EMERGENCY COORDINATOR - Continued

The following people will serve as emergency coordinator for the area affected by a hazardous waste emergency.

<u>DRUM STORAGE AREA AND COMPOUND AREA</u>	<u>PLANT EXTENSION</u>	<u>HOME PHONE</u>
Paul Kober - Primary	3616	369-7096
Charles Worlow - Alternate	2292	369-2269
Dick Frohreich - Alternate	3609	1-328-3628
John Friend - Alternate	3606,3607	369-7377
Joe Ware - Alternate	3610	1-327-5018

API SEPARATOR

Ted Lyon - Primary	3622	1-329-2721
Jerry Horstman - Alternate	3625	369-6005
Dick Frohreich - Alternate	3609	1-328-3628
John Friend - Alternate	3606,3607	369-7377
Joe Ware - Alternate	3610	1-327-5018

In the absence of the department heads, the department head will designate another person to perform his duties. This designee will become the primary Emergency Coordinator for the area affected by a hazardous waste emergency.

III. EMERGENCY PROCEDURES

The plant has an emergency plan which is implemented in the event of any plant emergency. The plan is included in Section 1.23 of the Plant Safety and Health Manual. In addition to this plan, the Emergency Coordinator must evaluate any emergency situation involving hazardous wastes and determine if the RCRA Hazardous Waste Contingency Plan is to be implemented. If the plan is implemented, the Emergency Coordinator has the following responsibilities:

- A. Take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste. These measures include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.
- B. Monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate, if the facility stops operation in response to the emergency.
- C. Provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, immediately after the emergency.
- D. Ensure that in the affected area(s) no waste which may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed.

If there are any questions concerning the proper handling of hazardous wastes or the means by which a hazardous waste spill should be cleaned up, contact the Director of Environmental Control.

HAZARDOUS WASTE CONTINGENCY PLANIV. ARRANGEMENT WITH LOCAL AUTHORITIES

The following verbal agreement has been made with the local fire department: If outside assistance is required and requested, the firemen who come into the plant will operate under the guidance and leadership of the Shift Supervisor involved with the emergency.

V. AREAS COVERED BY THE CONTINGENCY PLANA. Hazardous Waste Drum Storage Area

The hazardous waste drum storage area is the diked and fenced in area south of the east warehouse. This area is used for the storage of drummed hazardous wastes and other drummed materials.

B. API Separator & Slop Oil Tank

The API separator which is located east of the plasticizer tank farm is used to reclaim oils from the waste water generated during the plasticizer operation. Waste oils which cannot be reclaimed are stored in the slop oil tank just south of the API. Waste oil from the slop oil tank is periodically shipped to Stauffer Chemical Company who burn the oil for heat recovery.

VI. REPORTING

If the Emergency Coordinator determines that the plant has had a spill or fire that could threaten human health or the environment outside of the Plant, the National Response Center (1-800-424-8802) should be contacted immediately. The following personnel are authorized to contact the National Response Center:

Director of Environmental Control	Dick Frohreich	1-328-3628
Chief Process Engineer	Veldon Messick	1-327-0741
Senior Process Engineer	John Cole	1-323-5135
Plant Superintendent	Joe Ware	1-327-5018
Plant Manager	John Friend	369-7377
Vinyl Operations Superintendent	Dave Hollis	369-6422
Compound Operations Superintendent	Paul Kober	369-7096
Mechanical Superintendent	Ted Lyon	1-329-2721

In the event that the Hazardous Waste Contingency Plan is implemented, the time, date, and details of the incident are to be recorded in operating records of the unit affected. Within 15 days of the incident, a written report of the incident must be submitted to the State Solid Waste Division. The report is to include the following information:

1. Name, address, and telephone number of the plant.

HAZARDOUS WASTE CONTINGENCY PLANVI. REPORTING - Continued

2. Date, time and type of incident (fire or spill).
3. Name and quantity of material(s) involved.
4. The extent of injuries, if any.
5. An assessment of actual or potential hazards to human health or the environment.
6. Estimated quantity and disposition of recovered material that resulted from the incident.

VII. AMENDING EMERGENCY PROCEDURES

The Contingency Plan must be reviewed and amended, if necessary, whenever:

- A. Applicable regulations are revised.
- B. The plan fails in an emergency.
- C. The plant changes in its design, construction, operations and maintenance in a way that materially increases the potential for releases or hazardous wastes or hazardous waste constituents.

VIII. EQUIPMENTA. Communications

The following communications equipment is available at the plant: (1) two-way radios, (2) five channel Gaitronics system, (3) public address system, and (4) telephone.

B. Fire Fighting

There are fire extinguishers located throughout the plant. Fire fighting equipment is listed in Section 1.23 of the PVC Health and Safety Manual.

C. Spill Cleanup

For a list of available spill cleanup equipment, refer to Appendix A of the S.P.C.C. Plan.

rah/RAF disc/7-86

FJK ^

To: John Friend

From: A.H.Sather, D.W.Hollis
Date: October 13, 1986

Subject: SAFETY TRAINING FOR NON-PLANT VISTA SUPPORT PERSONNEL
ABERDEEN CHEMICAL PLANT

The following proposal is to satisfy the recommendation made by the 745 Reactor Manway Accident Investigation Team in their report dated November 25, 1985 on the above subject. The specific issues addressed in this proposal are:

- * Basic training requirements for non - plant VISTA support personnel who are to work in the Aberdeen Plant;
- * Annual retraining of non-plant personnel on critical plant safety issues; and
- * A safety training program for technical support personnel that covers plant related safety issues for all plants.

ANNUAL RETRAINING

A safety training program checklist has been developed which specifies the plant training requirements for personnel who are new or require retraining (see attachment). The checklist will be used to ensure consistent training for all personnel who will be working in the Aberdeen plant. The Safety Department will be responsible to conduct the training as specified on the checklist and to maintain accurate records. Safety personnel will also be responsible to issue an updated listing of this record in order that time can be allocated for test run personnel training/retraining. The update will be issued whenever a training program is conducted for VISTA technical personnel. The update will be issued to the Vinyl, Compound, and/or Mechanical Superintendent, along with the PED, R & D, and/or GED person designated by that department.

TECHNICAL SUPPORT SAFETY TRAINING PROGRAMS

The technical support departments should develop safety training programs for their personnel. The programs should include safety guideline highlights for all plants that are general in nature. Topics for consideration would reasonably include such items as pinch points, hand traps, hot surfaces (or hot fluid systems), plant emergencies, working with operating personnel, and other similar issues. The items shown below will be provided initially by the Aberdeen Plant. Other items will be provided as needed or upon request.

- * Aberdeen Safety Guideline Handbook (under revision).

A

* Test Run Guidelines (attached-to be included in Safety Control Systems Manual).

* Safety Training Checklist (attached).

In order to maintain the proper focus on safety, these departments should hold regular safety meetings.

A.H. Sather

A.H. Sather

David Hollis

D.W. Hollis

C: JWW, VEM, TFL, PJK, JRW

R&D SAFETY TRAINING LOG

<u>NAME</u>	<u>INITIAL</u>	<u>1986</u>	<u>1987</u>	<u>1988</u>	<u>1989</u>
BARCLAY, D. A.	1984				
BOSE, M.	1984				
BUTLER, A.	1984				
DECKER, L. B.	1985				
FENTON, D.	1985				
FENTON, J. T.	1985				
HAEFNER, L. G.	1983				
HOOKEANSON, S. H.	1982				
IRVINE, J. L.	1982				
JACKSON, R. D.	1978				
MARTIN, R. B.	1978				
MAGUIRE, S.	1984				
McDONALD, C. J.	1984				
OSBORNE, M. E.	1985				
QUY, R. B.	1984				
SCHIRBER, P. C.	1985				
SCHWAB, P. A.	1978				
SONES, E.	1986				
SORENSEN, W.	1984				
TURK, W. C.	5/1/86				
WARDWELL, A. W.	1984				

PED SAFETY TRAINING LOG

<u>NAME</u>	<u>INITIAL</u>	<u>1986</u>	<u>1987</u>	<u>1988</u>	<u>1989</u>
ARRINDELL, V. C.		2/14/86			
DOUGLAS, D. B.		7/31/86			
FARMER, D.	1984				
KARDOS, L. Z.	1985	7/31/86			
McCULLEY, J. H.					
MELLING, R. D.	1984				
MERRIS, C. S.	1985				
MEYER, E. J.	1984				
THOMAS, L. S.		7/31/86			
WEDGEWORTH, J.					

GED TRAINING LOG

<u>NAME</u>	<u>INITIAL</u>	<u>1986</u>	<u>1987</u>	<u>1988</u>	<u>1989</u>
CLARK, J.	7/8/85				
COYM, D.	1984	7/31/86			
CUMMINGS, J.					
DENTON, R.	7/8/85				
GROSS, C.					
HANSEN, H.					
JOHNSON, L.					
KRAMER, H.					
MATHEWS, T.					
MARTIN, S.	12/29/85				
RASMUSSEN, N.	11/26/85				
SMITH, L.					
STEEL, R.	7/8/85				
SODOWSKI, J.					
STONE, J.					

A

ABERDEEN CHEMICAL PLANT
SAFETY AND HEALTH MANUAL

SUBJECT: TEST RUN GUIDELINES

EFFECTIVE DATE: _____
WRITTEN BY: _____ SAFETY DIRECTOR
APPROVED BY: _____ PLANT MANAGER

The plant recognizes the need to conduct test runs of new equipment and formulations and is committed to working with R&D and PED to accomplish the work in a timely and effective manner.

SCOPE

This procedure applies to all test runs conducted by non-operating personnel.

PROCEDURE

*TEST RUN PLANNING

- A plan with proposed timing must be submitted to the operating superintendent for approval prior to the test run. Material Safety Data Sheets must be provided for any new raw materials planned for the test run at the time the plan is submitted. ANY MATERIAL (IMPORTED OR DOMESTIC) MUST BE REGISTERED AND LISTED ON THE TSCA CHEMICAL INVENTORY LIST BEFORE IT IS PURCHASED FOR LABORATORY OR PLANT USE! R&D personnel are responsible to complete ALL TSCA research before the material is requested for purchase.
- The plan must be reviewed in detail immediately prior to the start of the test run by the operations superintendent and the test run leader.
- Operations that will be performed by test run personnel will be agreed to by both parties and written into the plan.
- An approved written test run operating plan will be issued for all operations conducted or supervised by test run personnel.

*TEST RUN CONDUCT

- All test run personnel will be trained on the test run plan, and any jobs that will be performed by test run personnel.
- The operations shift supervisor will issue guidelines to his personnel regarding the conduct of the test run.
- Any operations work which is to be performed by non-operations personnel will be permitted by the operating

supervisor. Personnel performing operations type activity will receive on-site training and a final field review will be conducted with all outside personnel involved prior to the start of the test run. New oncoming shifts that are not aware of the test run plan must be trained on the plan in the field and a new permit issued.

**ABERDEEN CHEMICAL PLANT
SAFETY ORIENTATION CHECKLIST**

SUBJECT	DATE	SALARY		HOURLY EMPLOYEE		OUTSIDE VISTA		CONTRACT	TRAINEES
		NON-TECHNICAL	TECHNICAL	INITIAL	6 WEEK	BASIC	REFRESH		
ABERDEEN SAFETY ORIENT.-PT.1									
ABERDEEN SAFETY ORIENT.-PT.2									
ABERDEEN SAFETY ORIENT.-PT.3									
CONTRACTOR TRAINING - ALARMS									
SAFETY DIRECTOR - KEY ELEMENTS									
PLANT MANAGER - OPERATIONS INTRO									
VCM SAFETY									
LEAD SAFETY									
TOXIC SUBSTANCES CONTROL ACT									
PLANT SAFETY GUIDELINES									
DUPONT-NEW EMPLOYEE SAFETY TRAINING									
LIFTING-DEMONSTRATION/DISCUSSION									
LIFTING-BACKSCHOOL/NSC WORKBOOK									
HAZARD COMMUNICATION-CHEM. HAZARDS									
HAZARD COMMUNICATION-OSHA STANDARD									
HAZARD COMMUNICATION-PLANT PROGRAM									
SAFETY-A STATE OF MIND-SS#1									
VCM & LEAD DOSIMETRY									
FIRST AID ORIENTATION									
SECURITY PICTURES									
SAFETY EQUIPMENT ISSUE									
SCOTT AIR PAK									
FRESH AIR/3M AIR HAT									
FORK LIFT - CLASSROOM									
FORK LIFT - FIELD & LICENSE									
EQUIPMENT ENTRY - FILM									
PLANT ENTRY & LOCKOUT PROCEDURE									
LOOK BEFORE YOU REACH" -SLIDE SHOW									
DON'T PUSH YOUR LUCK-FILM									
SAFETY LOCK ISSUE									
MAKE MEETINGS MEAN SOMETHING-SS#2									
THE CONVINCER-SLIDE SHOW									
LINE BREAKING-FILM									
BASIC FIRE TRAINING									
KEY ELEMENTS OF SAFETY									
TEST RUN GUIDELINES									
RESPONSIBILITY TO ACT-EVEN YEARS									
PRE-FLIGHT YOUR JOB-SS#5-ODD YEARS									
PROOF OF AGE									
PLANT INTRODUCTION SHOW									
CONTRACTOR VCM HEALTH									
CONTRACTOR LEAD HEALTH									
PLANT SAFETY GUIDELINES									
CONTRACTOR HAZARD COMMUNICATION									
BADGE-MAKE/LOG/UPDATE GUARD LIST									

(REVIEW ITEM-#)

VAB.0001090900

COMPOUND, DRY BLEND, PLASTICIZER EVACUATION PLAN

Non-Fire Emergency

The shift supervisor will be responsible for the headcount during a non-fire related emergency evacuation. All personnel except the following will evacuate to the Primary Evacuation Area (warehouse at northwest corner of the staging area directly south of the auditorium):

Line V Mill Operator
Line I Mill Operator
Dry Blend Compounder
Line III Mill Operator
Plasticizer Operator
Shift Supervisor

The shift supervisor will take a headcount at the Primary Evacuation Area and direct those personnel to evacuate as appropriate. After he has reported his headcount results to the guard, he will return to the operating area to assist the above personnel in the shutdown of the process equipment. When shutdown is complete, he will lead the evacuation of the above personnel and report headcount results to the guard.

In the event that the Primary Evacuation Area is contaminated, the alternate evacuation site will be used. The alternate evacuation area is the fence line east of the parking lot and south of the guard house. If the alternate site is contaminated, the personnel will move to a safe location along the property line north of the plant.

Fire Emergency

The Line I Mill Operator will be responsible for the headcount during a fire emergency. The fire team from the Compound Department will consist of:

Shift Supervisor - Team Leader
Line III Compounder
Line III/Dry Blend Utility Operator
Line I Compounder
Line I Utility Operator
Automatic Bagger Operator
Line V Compounder
Line V Utility

Upon notification of a fire, each member of the fire team will report to the Line I mill area for headcount and assembly. When the team has assembled/organized, they will depart for the equipment storage point or emergency location whichever is appropriate. The Line I Mill Operator will report the results of the headcount to the guard.

Fire Emergency - Continued

The following personnel will remain in the department to shut down the process equipment:

Line I Mill Operator - Headcounter
Dry Blend Compounder
Line III Mill Operator
Plasticizer Operator
Line V Mill Operator

The Line I Mill Operator will lead the evacuation of the above personnel after all equipment has been shut down. Normal procedure will be to evacuate to the Primary Evacuation Area, take a headcount and report as a group to the emergency scene. Again, the headcount results must be reported to the guard.

10/01/86

Section
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VAB.0001090902

CONTENTS

PVC PLANT SAFETY & HEALTH MANUAL
ABERDEEN, MS

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SAFETY & HEALTH MANUAL SYSTEM	1.100	05/15/79
ORGANIZATION & ADMINISTRATION		
Safety & Health Policy	1.210	04/15/76
Accident & Injury Control	1.215	11/08/79
Injury Results Reporting To Employees	1.220	05/15/76
Fire Prevention Plan	1.230	03/18/83
Emergency Plan	1.232	07/26/85
Transportation Emergency Plan	1.240	07/15/77
CHEMTREC	1.250	03/06/81
Security Plan	1.260	06/11/86
HAZARD CONTROL		
Safety Control Permit	1.310	11/27/78
Equipment Entry Procedure	1.320	11/27/78
Equipment Entry Checklists	1.330	10/15/79
Lockout Procedure	1.340	11/27/78
Handtool Inspection Program	1.345	05/24/76
Employee Safety Suggestion Program	1.350	04/01/76
Hose Standards	1.355	07/08/86
Plant Safety Reviews	1.360	10/15/79
Hazardous Service Bleeders	1.365	07/08/86
Drum Handling Guidelines	1.370--	03/18/83
Empty Drums	1.371	07/08/86
MEDICAL		
Safety Glass Program	1/410	06/01/76
INDUSTRIAL HYGIENE		
Work Environment Hazard Control Program	1.510	03/16/84
Hearing Conservation Program	1.520	06/01/76
Respiratory Protection Program	1.530	06/10/86
Use and Disposal of Asbestos	1.540	01/01/81
Hazard Communication Program	1.550	04/28/86
TRAINING		
New Employee Indoctrination Program	1.610	02/23/76

**SAFETY & HEALTH
MANUAL SYSTEM**

To: SAFETY & HEALTH MANUAL DISTRIBUTION

From: A. H. Sather
Date: November 19, 1986

Subject: EMERGENCY ACTION GUIDELINES

Interoffice
Communication

VISTA

Attached, please find your copy of the Aberdeen Chemical Plant Emergency Action Guidelines. In this update, several important changes have been incorporated and are highlighted below.

1. The Emergency Officer is responsible for directing available resources in the manner he sees as most appropriate for the circumstances. This plan has been written to support the Emergency Officer in this regard. The guidelines indicate that many things can be done or considered in dealing with an emergency. Plant personnel must rely on the judgement of the acting Emergency Officer and perform the duties as requested.
2. The guidelines are briefly outlined on the first page and page references are shown to allow quick references for training and in time of need (name/phone lists, evacuation plans, immediate actions, etc.).
3. The community notification portion of the plan states that the City of Aberdeen has adopted a community evacuation plan. At this time, the City of Aberdeen is aware of the plan but has not accepted it.
4. Drill related changes have been incorporated.

These guidelines should be reviewed in safety meetings before the end of the year.

A. H. Sather

A. H. Sather
Safety Director

rah

attachment

DISTRIBUTION

J. FRIEND
J. W. WARE
T. F. LYON
D. W. HOLLIS
P. J. KOBER
R. A. FROHREICH
R. A. MILLER
W. F. HIGGINBOTHAM
A. H. SATHER
J. V. UPTAIN
J. G. ROBERTS
V. A. BELK
J. R. WILLIAMS
C. L. WORLOW
R. G. GILREATH

M. A. SWIERC
J. L. HORSTMAN
R. W. RYE
M. H. WILLIAMS
F. W. FRANTZ
C. W. TURNER (4)
L. D. HONEYCUTT
G. A. MORGAN
V. E. MESSICK
T. L. CUMMINGS
R. A. HOLLOWAY

**PVC PLANT SAFETY & HEALTH MANUAL
ABERDEEN, MS**

CONTENTS	<u>SECTION</u>	<u>DATE</u>
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CHEMICAL PLANT SAFETY AND HEALTH MANUAL
ABERDEEN, MISSISSIPPI

SUBJECT: PLANT EMERGENCY ACTION GUIDELINES

EFFECTIVE DATE: November 12, 1986

PREPARED BY: A. H. Satter SAFETY DIRECTOR

APPROVED BY: [Signature] PLANT MANAGER

References: 29 CFR 1910, Subpart L - Fire Protection
29 CFR 1910.1017 Vinyl Chloride

VISTA

SUMMARY OF EMERGENCY ACTIONS

The following items describe, in outline form, the actions that must be taken or considered in the event of a plant emergency. The items are not organized in order of priority. Details of this summary are found in the sections that follow.

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GENERAL

The Aberdeen Chemical Plant Management recognizes its responsibilities to its employees and the citizens of Aberdeen in event of emergency. The plant will make every effort to prevent the conditions which can lead to an emergency. In event of emergency, the primary concerns shall be the safety of employees and the general public.

PURPOSE

This plan has been developed to fulfill the following purposes:

1. To ensure the safety and welfare of employees and the general public in the event of a plant emergency;
2. Minimize property damage and provide for the resumption of normal operations following a plant emergency;
3. Satisfy the legitimate concern of employees, their families, and the general public by providing prompt, accurate information concerning the extent and effects of plant emergencies;
4. Describe the duties of each position listed in the emergency organization; and,
5. Outline the requirements for reporting plant emergencies.

SCOPE

A plant emergency is any unexpected event or condition which requires immediate action to prevent:

1. Injury to personnel;
2. Harm to the neighborhood; and/or,
3. Serious damage to plant equipment.

Plant emergencies include but are not limited to:

1. Toxic, flammable, or corrosive material releases;
2. Fires and/or explosions; or,
3. Personal injury that requires removal of a person from an elevated location.

The extent to which this plan is implemented will be determined by the severity or potential severity of the incident. This determination will be made by the Emergency Officer (alternate Area Shift Supervisor).

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IMMEDIATE ACTIONS

The management of the initial response to any emergency is the key to a successful outcome. This responsibility rests with the Emergency Officer (alternate Area Shift Supervisor). During this period, the following actions must be taken or considered.

I. Sound the Emergency Alarm

Anyone discovering an emergency should report the condition and location to the Vinyl control room by radio, Gaitronics or telephone extension 2200. The Lead Operator taking the call will turn on the alarm and initiate public address (P.A.) and Gaitronics announcements in the following sequence:

- Alarm on - 10 seconds - then off.
- Announce the location and condition (vapor release, fire, etc.)

The alarm system will be tested weekly during the fire system tests.

II. STOP ALL HOT WORK!

Motor vehicles, portable transfer systems, welding machines and other sources of ignition must be shut down immediately whenever the plant emergency alarm is sounded. Shut down and secure operations as required to prevent further injury to personnel or damage to equipment as follows:

- A. Stop flow of flammable materials feeding fires or potential fires, including dryer and incinerator gas burners, inert gas generator, building heaters, and the like.
- B. Boiler house operation is to be shut down only in cases where unfavorable wind conditions and flammable material release is great enough to present a hazard. Boiler house shutdown will normally occur on orders from the Plant Manager, Plant Superintendent, Emergency Crew Chief, the Emergency Officer, or the Safety Director. The Utility Technician must, however, rely on good judgement and shut down the boilers if there is a clear need. In such an event, the Utility Technician should act rapidly to shut down all ignition sources in the boiler house area. The forced draft fans on boilers may be needed to prevent vapor cloud flashback.
- C. Smoking on plant property is prohibited while the plant is under an alarm condition.

IMMEDIATE ACTIONS - Continued

III. Evacuation and Headcount

When area evacuation is necessary, all personnel will be accounted for in one of the following uncontaminated locations:

- Primary evacuation area;
- Secondary evacuation area;
 - At fence south of main gate, or,
 - At east gate (drum yard) if main gate is unsafe because of smoke or high vapor concentration.
- North property line in safe location.

Headcounts will be done as specified in Departmental Headcount Plans (see Attachment D). Emergency response personnel will report to the emergency location after being properly accounted for.

Primary Evacuation Areas

Vinyl Area - at pad north of the control room.

Compound/Plasticizer - Warehouse at northwest corner of the staging area directly south of the plant auditorium.

Lab - Office area near radio.

Utility Technicians - Boiler house.

Maintenance - Main shop.

Administrative Services - Canopy at main west entrance to main warehouse.

Back-Shift Administrative Services - Guard house.

Back-Shift - Mechanical Personnel - Shift Mechanics, pad north of Vinyl control room. All other personnel report to the guard house.

Main office personnel - Main office lobby.

Back-Shift - Engineering, Research or Office Personnel - Guard house.

Contractors and Truck Drivers - North of main gate.

IMMEDIATE ACTIONS - Continued

III. Evacuation and Headcount - continued

Visitors must be accounted for by escorting them to their point of entry.

Vista employees (plant and non-plant) working after normal business hours must be logged in on the Off-Hours Entry Log at the main gate. These personnel must report to the guard to satisfy the headcount requirement.

The guard will review the emergency action instructions printed on the vehicle pass with all incoming truck drivers prior to entry. Plant personnel should remind truck drivers about their responsibilities if the proper actions are not being taken.

Always evacuate upwind or at right angles to the wind. Use the wind socks (417, 281 silos, 502 blend tank), or steam plumes to choose the safest, upwind escape route.

IV. Rescue

Personnel who are not accounted for may be injured and rescue operations required. This will be determined by the Emergency Officer or Management Group after notification of the results of the headcount by the guard.

If the emergency is due to injury in an elevated location, the following equipment must be brought to the injury location:

From First Aid - First Aid Kit
- Scoop Stretcher
- Rescue Ropes (Green Bag)

From Emergency Equipment Station - Basket Stretcher
- Leather Gloves

Plant personnel will use this equipment under the joint direction of the Emergency Officer, Safety Director, Plant Nurse and/or ambulance personnel.

V. Emergency Control

The consequences of any given emergency condition are in many cases predictable and therefore controllable. Timely actions by plant personnel can minimize the seriousness of the incident. Emergency conditions require a coordinated effort using every safe and reasonable control method at our disposal. (There is a potential for emergency conditions to occur during electrical power failure. For this reason, the Vinyl Department has developed specific power failure procedures which are appended as Attachment E).

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IMMEDIATE ACTIONS - Continued

V. Emergency Control - continued

This section of the plan is divided into the following categories:

- Vapor Releases
- Fires
- Chlorine
- Fire Protection Systems
- Emergency Manpower

Emergency control responsibilities are:

Vinyl Supervisor - VCM tank farm, reactor and dryer areas, boiler house and lagoons.

Compound Supervisor - All remaining areas.

A. Vapor Releases

Vapor releases of flammable compressed gases such as vinyl chloride or propane must always be handled as if an ignition could occur at any time. Spills of other chemicals such as chlorine can be extremely dangerous and must be handled as instructed during utilities emergency training. Actions taken to control a chemical vapor release should include:

Control of Risks to Plant Personnel

- Obtain necessary manpower (consider use of Emergency Organization).
- Minimize personnel in area - bystanders should be evacuated.
- Use fire turnout equipment and Scott Air Paks as needed.
- Avoid entry into explosive vapor-air mixtures.

Protecting Equipment

- Start deluge systems immediately.
- Provide additional fire water using fire monitors to disperse liquid/vapor as needed.

Minimize Release of Material

- Block in leaking equipment remotely first - then as close as safely possible.
- Recover the material from the blocked in equipment if possible.

Consider Community Evacuation

IMMEDIATE ACTIONS - ContinuedV. Emergency Control - continuedB. Fire

Emergency personnel must evaluate the materials and circumstances involved in every fire. Liquid spill fires of flammable liquids like Methanol or gasoline should be put out. Compressed gas fires (i.e. VCM or propane) can cause destructive space explosions if they are extinguished without shut-off of gas flow. In these cases, it is recommended that the gas be allowed to burn itself out after block-in. Sound judgement by the Emergency Officer is critical to the safe control of any emergency.

The specific actions taken to control fires are the same as the controls listed for vapor releases.

C. Chlorine

In the event of a chlorine leak, plant response must be directed toward:

- Stopping the leak safely.
- Calling our supplier to obtain assistance in safe removal of the leaking container from the plant (or safely disposing of the contents).
- Community notification if needed.

Thompson Hayward Chemical Company supplies our chlorine. They will respond if requested to any chlorine related problem and want to be informed if and when we experience problems with their containers. Whenever we have problems with ton tanks, they plan to respond as a matter of policy. Their emergency telephone numbers are:

Jackson, MS Office: 1-969-3177
(24 hr./day - using
answering service)

Wayne Meyers 1-373-4327
(Vista Sales Contact)

John Newman 1-922-1219
(Branch Manager)

The guard can make the call. He/she needs answers to the following questions before the call is made:

- What is leaking?
Tank size and item that is the leak source.
- How bad is the leak?
Large/small, vapor/liquid, etc.

IMMEDIATE ACTIONS - ContinuedV. Emergency Control - ContinuedC. Chlorine - continued

- Can we control with our emergency kits?
- When are they needed?

When the leak has been temporarily controlled with the capping kit, our preference is for them to take the cylinder to their filling plant in Memphis. They will do this if it can be done safely. If they feel that transporting the cylinder is not a safe approach, they will discuss other alternatives with the Plant Manager.

D. Fire Protection Systems

Deluge systems, fire monitors, hose stations and other equipment have been installed throughout the plant to:

- Eliminate ignition sources;
- Cool equipment;
- Dilute flammable vapors; and,
- Remove heat from fires.

The various fire protection systems can be started as shown below:

<u>System</u>	<u>How Started</u>	
Reactor/VCM Compressor Shed Deluge Systems*	<u>Manual</u>	- Pull box station at deluge valve. - Control panel switch
	<u>Automatic</u>	- Flammable vapor detectors (reactor areas only) - Fire (heat) detectors
Sphere Weir & Fire Monitors	<u>Manual</u>	- Air bottles - field - Local switch (Weir only) - Control panel switch
	<u>Automatic</u>	- Fire (heat) detectors (Weir only)

Other fire monitors and hose stations manual.

* Loss of pressure in the supervisory air system below 7 psig will cause the diaphragm bypass valve (control valve) to release the water trapped in the upper chamber of the deluge valve. When this occurs, the pressure of the water from the fire water system will push the water out of the deluge valve's upper chamber causing fire water to flow freely to the deluge spray piping system.

IMMEDIATE ACTIONS - Continued

V. Emergency Control - Continued

D. Fire Protection Systems - continued

Deluge Systems - should be used for:

- Serious leaks from rotating equipment seals.
- Flammable material releases from valves, flanges, relief systems, or other process equipment. NOTE: Use caution when putting cold water on metal castings (i.e. compressors, vacuum pumps, Corken compressors). Thermal shock could fracture the case.
- Fires

Fire Monitors (stationary or portable) - should be used:

- Where no deluge systems exist.
- Where discharge is above the protected vessels' deluge spray nozzles.
- To supplement deluge systems in areas of high heat or vapor concentration.

Other Equipment

Additional fire fighting equipment is available to supplement fixed fire monitors and preconnected fire hose. This equipment can be found in fire hose houses marked with a (+) and at the Vinyl area emergency equipment station.

E. Emergency Manpower

The objective of any plant emergency response is to control the incident without injury to personnel and minimal equipment damage. In order to achieve this objective, the Emergency Officer must concentrate his attentions on:

- Evaluating the nature and extent of the emergency.
- Planning the plant response.
- Determining manpower and equipment needs.
- If appropriate, call out the Emergency Organization.
- If needed, notify or request help from the fire department and/or hospital ambulance service.
- Keep our neighbors' needs in mind - evacuate them if appropriate.
- Judge the conditions conservatively.

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IMMEDIATE ACTIONS - Continued

V. Emergency Control - continued

E. Emergency Manpower - continued

The basic emergency response guidelines are:

1. Activate the plant emergency alarm from the control room as follows:
 - Turn on the emergency alarm for ten seconds.
 - Reset the alarm.
 - Announce the nature of the problem twice over the public address and Gaitronics systems.
 - The guard will announce the wind direction and speed after the alarm announcements have been made.

Any time the emergency alarm is sounded, all contractors and plant departments except compound, dry blend and plasticizer will immediately follow the evacuation plan. Compound, dry blend and plasticizer personnel will await instructions from their supervisor unless the emergency involves a fire. In the event of a fire, all personnel should respond according to department fire procedures.

Lab personnel should report to the lab when the alarm sounds. After proper accounting of personnel occurs, two personnel should be sent to the Vinyl control room (assemble on the pad north of the control room unless the weather is bad or the area is contaminated). All other Lab personnel will stay near the base radio to respond to needs from the field.

If the emergency is due to a fire, emergency crews are to follow departmental fire plans, obtain turnout gear and proceed to the upwind side of the emergency.

2. Activate callout of the Emergency Organization if appropriate from the control room.
 - A. Normal Office Hours: Announce "Activate Emergency Organization" twice over the public address and Gaitronics systems.
 - B. Back Shifts - Have control room personnel instruct the guard to call out the Emergency Organization per the call list (Attachment B).
3. Follow the Emergency Control Guidelines for fires and vapor releases, or personnel rescue.
4. Initiate rescue response to locate personnel who were not accounted for during the headcount.

IMMEDIATE ACTIONS - Continued

V. Emergency Control - continued

E. Emergency Manpower - continued

5. Initiate rescue response for personnel known to be down in the area of the emergency if it is judged safe to do so by the Emergency Officer.
6. Take care of injured personnel - call in an ambulance to stand by if needed.
7. Assist the Utility Technician as needed to control emergencies in the utilities area.
8. Evacuate the plant and/or community if threatened with toxic concentrations of vapor or smoke.
9. Determine the extent of contamination during vapor releases. During the emergency, this should be done with the Honeywell area monitoring system. During office hours, the Safety Supervisor will make determination. During back shifts, the Vinyl Supervisor will make this determination using available manpower.

VI. Outside Assistance

Outside police, fire and medical resources should be utilized if needed. The guard will call if requested.

Aberdeen Fire Department.....369-9551

Ambulance.....369-2455
OR.....369-9393

Aberdeen-Monroe County Hospital
Emergency Room.....369-2455

Dr. R. E. Coghlan (Office).....369-2411
(Home).....369-4418

Dr. J. N. Turnage (Office).....369-2413
(Home).....369-6311

Dr. Arthur Brown (Office).....369-6977
(Home).....369-9426

Aberdeen Police Department.....369-6454

Guidelines for the use of the Aberdeen Fire Department are:

- The Aberdeen Fire Department has agreed to provide assistance in the areas of manpower and fire water pressure boosting for handlines.

IMMEDIATE ACTIONS - Continued

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VI. Outside Assistance - continued

- The Emergency Officer is responsible for determining if fire department assistance is necessary to control a fire. If he determines that they are needed, he must initiate the call by notifying the guard. He must assign someone to meet the fire truck at the guard house. The guard should be informed as to who has been assigned to meet the fire truck so he can tell the fire truck driver who to follow. The guard will hold the fire truck until the escort arrives. Specific instructions should be given to the employee assigned to meet the fire truck so the route of travel and destination are understood. (A reactor Lead Operator can give these instructions to the fire truck driver on entrance road east of the control room.) After the instructions have been given to the fire department personnel, one of their initial respondents will return to the gate to guide additional fire personnel to the scene as a group.
- The Emergency Officer shall retain the control of all fire fighting operations.
- Additional manpower from the fire department may arrive at the plant in personal vehicles. They should be allowed to pass through any roadblock. They are to park in the employee parking lot. Fire department personnel are to assemble at the gate and will be escorted to the fire location by a Vista employee, designated by the Emergency Officer or the fire department respondent. Aberdeen Fire Department personnel must be equipped with fire turnout equipment. The Emergency Officer must judge the needs and send firemen back if the turnout equipment is inadequate.

VII. General Plant Evacuation and Community Notification

Vista Polymers will act as a responsible citizen of Aberdeen and notify the community of any toxic or flammable gas release, or fire that could pose an immediate life threatening hazard outside the plant boundaries.

The Emergency Officer must make an initial assessment of the emergency. In this evaluation, two questions must be answered and actions initiated if appropriate.

- A. Can the emergency be controlled with personnel currently in the plant? If not, notify the guard to initiate callout of the Emergency Organization as noted in Attachment B of this plan.
- B. Can the gases or smoke and vapors enter other populated areas in sufficient concentration to be harmful? If other unit areas or the community can be harmed by the emergency, the following items must be considered:

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IMMEDIATE ACTIONS - Continued

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VII. General Plant Evacuation and Community Notification - continued

1. Wind direction and speed;
2. The size of the leak, release or fire;
3. Is the gas/smoke cloud dispersing or is it staying together and headed for nearby unit areas or neighborhoods.

Sound judgement is of the utmost importance. If the Emergency Officer or Emergency Crew Chief believes the decision to evacuate plant areas and/or notify community officials can safely wait until the Plant Manager or his designee arrives, he should do so. If, however, there is a clear risk of serious injury if the decision is delayed, paragraph B below should also be implemented. The actions which follow any decision to evacuate down wind areas are:

- A. Instruct the Vinyl Lead Operator to sound the evacuation alarms (Gaitronics alarm for evacuation local to the plant, Gaitronics and siren for conditions when harm can come to nearby neighbors). Plant evacuation instructions should reference general plant areas to avoid confusion.
- B. Instruct the guard to notify the police department.

The guard should repeat the following message to the police department dispatcher:

"THIS IS _____ (NAME) _____, SECURITY GUARD AT VISTA POLYMERS. THERE HAS BEEN A SERIOUS (FIRE, TOXIC GAS, FLAMMABLE GAS RELEASE) AT THE PLANT. YOU SHOULD INITIATE EVACUATION PROCEDURES (DIRECTION FROM PLANT) OF THE PLANT.

INSTRUCT RESIDENTS TO LEAVE (ON FOOT, BY VEHICLE), OR STAY IN HOME AND CLOSE WINDOWS AND DOORS AND STOP AIR CIRCULATION".

- C. Instruct control room personnel to turn on the big siren.

The City of Aberdeen has an evacuation plan. In order to prevent exposure to people in vehicles passing by or traveling into an emergency, roadblocks will be established as early as possible in an emergency as manpower resources are available. Plant personnel will therefore be issued photo identification emergency roadblock passes to allow them to respond to emergencies at the plant.

VIII. RE-ENTRY TO WORK AREAS

Areas that have been involved in plant emergencies shall not be entered for the resumption of work until the area supervisor has verified the problem has been corrected, the area is free of hazards, and the "all clear" alarm sounded.

EMERGENCY ORGANIZATION

Please refer to the attached EMERGENCY ORGANIZATION chart (Attachment A) for the following discussion. When activated, this organization shall be directed by the Management Group, which bears overall responsibility for meeting the objectives of the plan.

I. Activation

The shift supervisor responsible for the area where the emergency occurs will become the Emergency Chief. He is then responsible for all initial immediate actions which can include activation of the Emergency Organization to obtain help. If the Emergency Organization is needed, it is activated as follows:

Normal Office Hours - The Emergency Officer or Emergency Chief will have an announcement made over the public address and Gaitronics systems to "ACTIVATE EMERGENCY ORGANIZATION". The announcement and the specific assembly instructions will be given two times.

Back Shifts - The announcement and assembly instructions should be given as noted above and the guard should be instructed to make the initial callout for the area involved. Once the personnel from this callout arrive, they may request the guard to call out additional specific personnel. All personnel contacted for emergency duties should immediately report to the plant to assume their emergency duties.

The Acting Emergency Officer can request all announcements and callouts to be accomplished through the control room.

II. Emergency Organization Specific Duties

The following is a discussion of the specific duties assigned to each position in the Plant Emergency Organization

A. Management Group

The Management Group will consist of the Plant Manager, the Plant Superintendent and the Employee Relations Director. The Vinyl or Compound Operations Superintendent not serving as the Emergency Officer will serve as an alternate for a vacancy in the Management Group. The duties of the Management Group are:

1. Provide leadership for the Emergency Organization and coordinate all activities connected with control of the situation.
2. Promptly release factual information to the news media in order to prevent erroneous reports.

II. Emergency Organization Specific Duties - Continued

Management Duties - continued

3. Notify Corporate Management and keep them apprised on the situation.
4. Notify next of kin in cases of serious or fatal injuries.
5. Maintain close communication with the Emergency Officer.

B. Emergency Officer

The Operations Superintendent of the area affected will serve as the Emergency Officer. He will report directly to the Management Group and will be in overall charge of emergency control activities. He will be assisted in this duty by the Safety Director and the Chief Process Engineer. The alternate to the Operations Superintendent is the Operations Supervisor of the area involved. When the Operations Supervisor and Superintendent are both present, the Operations Supervisor will also act as an Assistant Emergency Officer. The duties of this function are:

1. Work closely with the Emergency Crew Chief in determining the most effective manner of establishing control of the situation.
2. Keep the Management Group informed of the situation and the action being taken to bring it under control.
3. Rely on the advice and help of the Assistant Emergency Officers and the Safety Director.
4. Issue instructions for the "Call-Out" of off-duty employees and advise the Security Officer of who is authorized to enter the plant.

C. Assistant Emergency Officers

The Chief Process Engineer and Operations Supervisor will serve as the Assistant Emergency Officers. They will assist the Emergency Officer in the evaluation of the situation and the planning of action necessary to establish control of the emergency. They will also provide any technical information regarding the equipment or process that might be necessary. They will keep the Emergency Officer informed of their whereabouts at all times. Senior Process Engineers will serve as alternates to the Assistant Emergency Officers.

D. Security Officer

The Safety Supervisor will serve as the Security Officer, and will report to the Management Group. His specific duties are:

II. Emergency Organization Specific Duties - Continued

D. Security Officer - continued

1. Provide security protection for all plant property and material. This will include procurement and assignment of guards, as needed.
2. Dispatch personnel to the roadblocks so that authorized personnel may be identified and allowed into the area. Unauthorized personnel must be turned back in a firm, tactful manner.
3. Media representatives will be directed to the Management Group in the front office area as directed by the Plant Manager.
4. Provide emergency supplies that might be needed during the emergency. This includes emergency arrangements to obtain diesel fuel for the fire pumps and emergency generators.
5. Monitor VCM concentrations in the area of the secondary evacuation area southwest of the guard house. In the event of high VCM concentrations, he shall direct personnel to a safe area along the highway. If the gate area becomes unsafe due to hazardous chemicals in the air, he will direct the guard to move to the alternate evacuation gate at the east warehouse.

E. Safety Director

The Safety Director will assist the Emergency Officer in controlling the emergency. His primary responsibility is in helping with fire fighting and rescue efforts. He will work closely with the Emergency Crew Chief.

Following an emergency, the Safety Director will assist Department Heads in restoring safe conditions throughout the plant. He will also see that emergency equipment is serviced and placed in the proper locations. He will act as leader of a team appointed by the Manager to make a detailed study of the causes of the emergency, action taken, and any recommendations made to prevent similar emergencies.

The Safety Director will also be responsible for the following areas of emergency preparedness:

1. Review of the Fire Prevention and Emergency Plan on an annual basis.
2. Organize training programs as necessary to insure prompt and adequate response to emergencies in the following areas.

II. Emergency Organization Specific Duties - Continued

E. Safety Director - continued

a. Basic Fire Training

All personnel who work in the plant operating areas will be given basic fire fighting training pertaining to the use of portable fire extinguishers, emergency alarm systems and evacuation procedures. This will normally occur on an annual basis. New employees will receive basic fire training within 120 days of employment.

b. Advance Fire Training

All operating, mechanical and engineering personnel will be trained more extensively in automatic fire control systems, operation of the plant fire water system, fire fighting methods and basic fire theory.

c. First Aid

Organize annual refresher first aid training of off-shift first aid personnel and basic first aid for all personnel who work in the plant operating areas.

d. Mock Drills

Organize mock drills in which serious plant emergency conditions are staged. The drills may include notification of community officials. A critique will be conducted immediately following the drill. All drills and critique results will be documented and reported as necessary.

3. Emergency Crew Chief

The Vinyl Shift Supervisor will fill the position of the Emergency Crew Chief during emergencies in the vinyl unit areas, boiler house, waste treatment and VCM tank farm areas. The Compound Shift Supervisor will act as the Emergency Crew Chief in the remaining areas. The appropriate Chief will direct the Emergency Crew and others involved in fire control or other emergency action. He will work closely with Emergency Officers and the Safety Director in the effective use of manpower and equipment necessary to bring the situation under control.

The Emergency Chief will usually be the first individual in authority to recognize the existence of an emergency situation. He must make the immediate decisions regarding the emergency action and continue in this capacity until the Emergency Organization can assemble, if required. The Emergency Chief will initiate the actions to put this plan into effect.

Once the Emergency Officer arrives, the Emergency Chief will report to him.

II. Emergency Organization Specific Duties - Continued

G. Assistant Emergency Crew Chief

The Compound Shift Supervisor will serve as the Assistant Emergency Crew Chief during emergencies in all areas of the plant, except Compound, Plasticizer, Laboratory, Office and Warehouse. In those areas, the Vinyl Shift Supervisor will act as Assistant Emergency Crew Chief. The Assistant Chief's duties will be as follows:

1. Make sure that all of the Emergency Crew members in his area leave for the scene of the emergency.
2. Report to the Emergency Crew Chief for instructions.

H. Mechanical Chief

The Mechanical Superintendent will act at the Mechanical Chief during the time of the emergency. The alternate is the Maintenance Superintendent. In this capacity, the Mechanical Chief will report to the Emergency Officer. He will carry out the following duties:

1. Organize and direct damage control work as directed.
2. He will be in charge of all personnel reporting to the shop area.
3. Assist the Emergency Officer in any way necessary to bring the situation under control.
4. Establish relations with outside utility companies and work closely with them, maintaining or restoring service as soon as possible.
5. Notify the Security Officer of the names of those people in the plant under his direction and of any who have been called out.
6. Keep the Emergency Officer informed of his whereabouts at all times.
7. Organize and direct clean-up and repair crews for the purpose of getting the plant safely back into operation as soon as possible.

I. First Aid Chief and Assistants

The Nurse will act as the First Aid Chief and will report to the Emergency Officer. Laboratory "A" Technicians will act as Assistants. The alternate for the Nurse will be the Laboratory Lead Technician. The laboratory personnel will assist the Emergency Officer and/or the Nurse. The duties of this function are:

II. Emergency Organization Specific Duties - Continued

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I. First Aid Chief and Assistants - continued

1. The First Aid Chief will dispatch personnel to the emergency scene whenever the Emergency Organization is activated or there is a call for first aid help. The remaining first aid personnel will report to the Lab office area (near the radio).
2. Give first aid to the injured.
3. Advise the Communications Chief if ambulances are needed. (Note: An ambulance may be requested to stand by as noted in the Medical Treatment Section below).
4. Keep the Management Group and the Security Officer informed of injuries, including the names and estimates of severity.
5. Accompany injured personnel being transported by ambulance.

J. Messengers/Escorts

The Messengers will report to the Emergency Organization member to whom they are assigned. The Mechanical Superintendent will assign Mechanical Engineers to the messenger positions as appropriate. Process Engineers not assigned duties shall report to the Management Group.

K. Fire Pump Operators

Serious plant emergencies can require extended operation of fire pumps. In order to meet this need, the fire pumps will be staffed using Mechanical Department personnel. During normal day operation, the tool room mechanic will report to the number 1 (north) pump house, and the Shift Mechanic will report to the number 2 (south) fire pump house. Whenever the Shift Mechanic is the only employee available, he will move back and forth between the two pump house buildings. During emergencies that do not involve the fire pumps, the mechanics should remain in the shop.

Normally, coverage is necessary at both pump houses anytime the Emergency Organization is called out. The guard is to call out mechanics to fill the positions as rapidly as possible.

The duties of the fire pump operator are:

1. Monitor engine temperatures and oil pressures.
2. Be alert for abnormal sounds and conditions.
3. Monitor fuel levels and alert the security officer (Alternate: Safety Director) when fuel levels fall below 50 percent. The Security Officer will then initiate procurement of the fuel.

II. Emergency Organization Specific Duties - Continued

K. Fire Pump Operators - continued

4. Monitor and report any abnormal conditions to the Security Officer (Alternate: Safety Director).

Whenever there is no coverage by any of the above, the Dryer Lead Operator or Reactor Lead Operator shall ensure that the north fire pumps are operating. The guard can start the pumps manually, if requested. The Vinyl Shift Supervisor shall be responsible for the shutdown of the fire pumps when any emergency condition has been corrected.

L. Emergency Crews

There are two Emergency Crews. The objectives of these are to insure that, through quick action, we will be able to protect employees and minimize any damage due to fire. Both crews are to report to the announced location of the emergency when summoned by alarms, the Shift Supervisor, or when the Emergency Organization is activated. The crews will consist of the following based on a Vinyl area emergency:

Number 1 Emergency Crew

Emergency Crew Chief - Vinyl Shift Supervisor and personnel noted on Attachment A "Emergency Organization".

Number 2 Emergency Crew

Assistant Crew Chief - Compound Shift Supervisor and personnel noted on Attachment A "Emergency Organization".

The specific duties and responsibilities are discussed at length in the section entitled "Emergency Control" beginning on page five of this plan.

M. Maintenance Support Group

The Support Group will consist of all Maintenance personnel (supervisors and hourly). They will report to the Maintenance Shop and be under the direction of the Mechanical Chief. The Maintenance Superintendent will stay in the shop with the personnel. The Mechanical Chief will contact him to assign emergency duties to this group as needed.

N. Guards

The specific emergency duties of the Security Guard are:

1. Direct ambulance and other vehicles to the emergency as noted in this plan using plant personnel as guides.

II. Emergency Organization Specific Duties - Continued

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N. Guards - continued

2. Stop all vehicle traffic into the plant anytime an alarm is sounded. Have the driver park without blocking the gate. Do not permit unauthorized personnel to enter the plant (see media response below).
3. Phone the Emergency Organization when instructed to do so by the Vinyl Shift Supervisor, the Compound Supervisor, or their designees (see Attachment B).
4. Monitor fire pump operation as noted in K above.
5. Record wind direction and speed, barometric pressure, time and outside temperature at the time of a gas release or fire.
6. Announce the wind speed and direction (i.e. from _____ to _____) over the plant public address system.
7. Receive all calls regarding the headcount status. This information shall be reported to the Management Group. (Alternate: Emergency Officer, Emergency Crew Chief).
8. Media Response - In a serious plant emergency, media personnel will either be calling in or coming to the gate. Calls by the media on the telephone shall be handled by requesting the caller's name, who he/she represents, a phone number where they can be reached and a promise that the message will be given to the Manager or his designee. The statement should also include the fact that either the Plant Manager or his designee will call them with a statement. Media personnel who arrive at the gate will be escorted by Vista personnel from the gate area to a pre-determined location where the Manager or his designee will make statements.
9. In the event the main gate area becomes unsafe because of smoke or high vapor concentrations, the guard shall open the east gate (Transportation Warehouse) for an evacuation exit.

O. Communications Chief

The Director of Administrative Services will act as the Communications Chief. His alternate will be the Plant Accountant. The Security Officer will act as Communications Chief until the Director of Administrative Services or the Plant Accountant can be contacted and arrive. In this capacity, he will:

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II. Emergency Organization Specific Duties - Continued

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O. Communications Chief - continued

1. Establish the gatehouse switchboard as an emergency and communications headquarters. An off-duty Security Guard will be provided to assist the Communications Officer.
2. Handle all incoming and outgoing calls.

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REPORTING REQUIREMENTS

All significant emergencies will be reported by the Plant Manager to the Vice-President of Manufacturing within 24 hours. For this reason, the Plant Manager must be promptly informed of any emergency incident. The guidelines for reporting emergency conditions are shown below:

I. Fires

- A. Any fire which causes damage should be reported to the Plant Manager.
- B. Any other fire incidents should be reported to the Plant Manager by the next workday after the fire.

All significant fires will be thoroughly investigated by a team appointed by the Plant Manager. A FIRE REPORT (Attachment C) must be completed as rapidly as possible for use by the investigating team.

II. Vapor Releases and Other Emergencies

- A. The Operations Superintendent will issue a written report on each VCM emergency as soon as possible, not to exceed 24 hours.
- B. The Plant Safety Director or the Plant Superintendent will report VCM emergencies and the facts obtainable to the OSHA Area Director as required by OSHA regulations.
- C. The Director of Environmental Control or the Chief Process Engineer will report VCM emergencies and the facts obtainable to the Mississippi Bureau of Pollution Control and/or the Environmental Protection Agency if required by regulations.
- D. The Director of Environmental Control or the Chief Process Engineer must be notified regarding any spill of a potentially hazardous material as soon as the spill is discovered. He will promptly report the spill to the Superfund National Response Center if required by regulation.

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Anyone who loses consciousness because of inhalation of any substance is to be taken to the Aberdeen-Monroe County Emergency Room as soon as possible. In all cases, the treating physician must be given the chemical name of the agent (material) which is suspected of causing the injured person to be overcome. Material Safety Data Sheets are available at the Aberdeen-Monroe County Hospital Emergency Room.

EMERGENCY TELEPHONE NUMBERS

Ambulance, Monroe County Hospital.....	369-2455
Dr. Coghlan, Office.....	369-2411
Home.....	369-4418
Dr. Turnage, Office.....	369-2413
Home.....	369-6311
Dr. Brown, Office.....	369-6977
Home.....	369-9426

Aberdeen Police Department.....369-6454
Sheriff's Office.....369-2468
Mississippi State Police.....(Contact Police Department)

Aberdeen Fire Department.....369-9551

Aberdeen Light & Water Department.....369-4731
or.....369-2159
or.....369-6454

R. E. Lehmkuhl, Office.....713-531-3580
Home.....713-780-1270

R. T. Ferrell, Office.....713-531-3460
Home.....713-531-4898

M. S. Reynolds, Office.....713-531-3210
Home.....713-726-0936

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EMERGENCY NUMBERS - Continued

D. A. Kuhn, Office.....713-531-3584
Home.....713-467-9935

T. G. Grumbles, Office.....713-531-3445
Home.....713-445-4053

J. C. Ledvina, Office.....713-531-3446
Home.....713-879-8732

J. R. Drumwright, Office.....713-531-3444
Home.....713-492-8449

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ATTACHMENT A

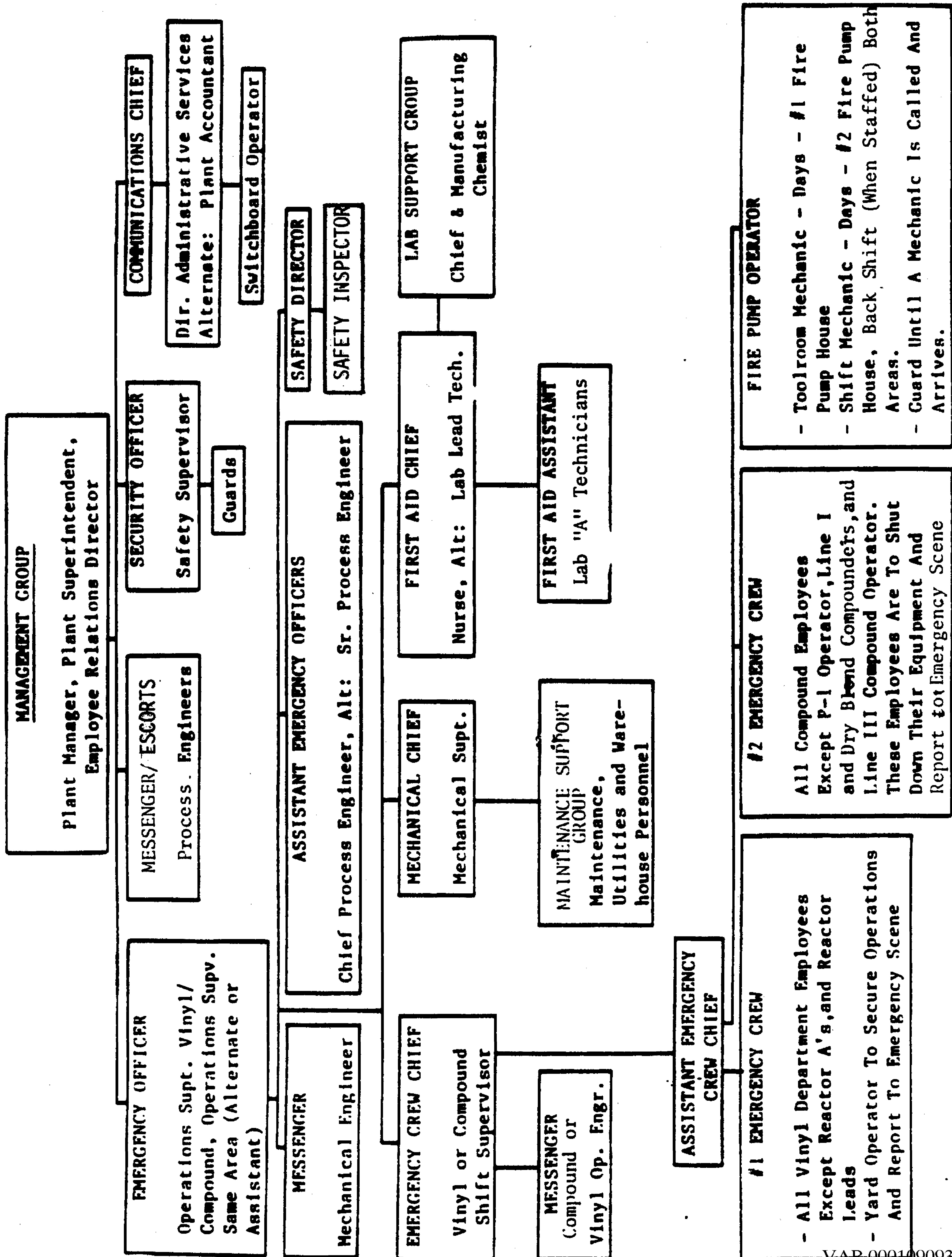
EMERGENCY ORGANIZATION

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**ATTACHMENT A
EMERGENCY ORGANIZATION**



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ATTACHMENT B

EMERGENCY ORGANIZATION LIST

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ATTACHMENT B

EMERGENCY ORGANIZATION CALL LIST

When advised by the Shift Supervisor, or his designee, the guard will start calling the names listed below in numerical sequence (rank order) from the appropriate list.

<u>Vinyl</u>	<u>Compound</u>	<u>Utilities</u>
1. C. W. Turner 369-7381	1. C. L. Worlow 369-8862	1. G. A. Morgan 369-6522
2. D. W. Hollis 369-6422	2. P. J. Kober 369-7096	2. M. H. Williams 1-963-2796
3. J. W. Ware 1-327-5018	3. J. W. Ware 1-327-5018	3. D. A. Miller 1-356-6274
4. A. H. Sather 369-9271	4. A. H. Sather 369-9271	4. J. L. Horstman 369-6005
5. J. Friend 369-7377	5. J. Friend 369-7377	5. T. F. Lyon 1-329-2721
6. J. V. Uptain 369-8109	6. J. V. Uptain 369-8109	6. J. W Ware 1-327-5018
7. J. G. Roberts 369-8059	7. J. G. Roberts 369-8059	7. A. H. Sather 369-9271
8. J. M. Edwards 369-8723	8. J. E. Nickerson 369-9235	8. J. Friend 369-7377
9. Dean Honeycutt 343-5595	9.	9. J. V. Uptain 369-8109
		10. J. G. Roberts 369-8059

Attachment B-1 is a Secondary Call List. The personnel to be called by the guard will be identified by any of the above noted Emergency Organization respondents after they arrive on the scene.

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ATTACHMENT B-1

Mechanical

F. W. Frantz
369-8508

R. E. Polk
1-327-6766

J. L. White
369-2991

Satish Gianchandani
1-356-7577

R. W. Rye
369-4730

K. S. Allen
369-9210

C. A. Clark
369-6255

Process Engineering/Environmental

V. E. Messick
1-327-0741

R. A. Frohreich
1-328-3628

V. L. Thornhill
369-8952

S. C. Hillman
369-7892

M. L. Nathan
369-8613

F. G. Jeanson
1-324-2329

J. G. Cole
1-323-5135

Rendell Newton
1-328-0904

Brett Bass
1-329-1547

Lab/Safety

V. A. Belk
369-4416

J. R. Williams
256-3810

B. P. Sizemore
369-7323

D. S. Cox
369-8752

Administrative

W. F. Higginbotham
1-327-4064

P. J. Riesenber
1-329-1670

M. A. Swierc
1-327-8229

T. L. Cummings
369-6058

R. A. Miller
1-327-0951

Vinyl

R. A. Collins
369-6184

B. F. Hawkins
343-8832

A. L. Reeves
369-6919

D. F. Johnson
256-8279

L. D. Honeycutt
343-5595

B. G. King
256-7086

Compound

A. L. Barr
369-6594

T. L. Noland
1-(205)-698-9962

J. O. Howell
256-8991

C. L. Smith
369-8398

W. J. Davis
369-9181

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ATTACHMENT C

FIRE REPORT

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FIRE REPORT

PART I (To be filled in by Supervisor of area or activity involved)

Date of Fire: _____ **Time:** _____ **A.M.**
_____ **P.M.**

Exact location of fire: _____

Equipment involved (tank no., pump no., name of bldg., etc.) _____

How did the fire start? _____

How was the fire put out? _____

Description of personnel injuries: _____

Description of property damage: _____

What immediate action have you taken to prevent a recurrence? _____

Was fire protection adequate? _____

Estimate of damage: (A) 0 - \$1000 (B) \$1000-\$15,000 (C) \$15,000 +

Production delays: _____

Signed _____ **Date** _____ **Signed** _____ **Date** _____
(Supervisor) (Department Head)

PART II (Safety Department Review)

Remarks: _____

Signed _____ **Date** _____ **Signed** _____ **Date** _____

RETURN TO SAFETY DEPARTMENT

ATTACHMENT D

DEPARTMENTAL HEADCOUNT PLANS

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COMPOUND, DRY BLEND, PLASTICIZER EVACUATION PLAN

Non-Fire Emergency

The shift supervisor will be responsible for the headcount during a non-fire related emergency evacuation. All personnel except the following will evacuate to the Primary Evacuation Area (warehouse at northwest corner of the staging area directly south of the auditorium):

- Line V Mill Operator
- Line I Mill Operator
- Dry Blend Compounder
- Line III Mill Operator
- Plasticizer Operator
- Shift Supervisor

The shift supervisor will take a headcount at the Primary Evacuation Area and direct those personnel to evacuate as appropriate. After he has reported his headcount results to the guard, he will return to the operating area to assist the above personnel in the shutdown of the process equipment. When shutdown is complete, he will lead the evacuation of the above personnel and report headcount results to the guard.

In the event that the Primary Evacuation Area is contaminated, the alternate evacuation site will be used. The alternate evacuation area is the fence line east of the parking lot and south of the guard house. If the alternate site is contaminated, the personnel will move to a safe location along the property line north of the plant.

Fire Emergency

The Line I Mill Operator will be responsible for the headcount during a fire emergency. The fire team from the Compound Department will consist of:

- Shift Supervisor - Team Leader
- Line III Compounder
- Line III/Dry Blend Utility Operator
- Line I Compounder
- Line I Utility Operator
- Automatic Bagger Operator
- Line V Compounder
- Line V Utility

Upon notification of a fire, each member of the fire team will report to the Line I mill area for headcount and assembly. When the team has assembled/organized, they will depart for the equipment storage point or emergency location whichever is appropriate. The Line I Mill Operator will report the results of the headcount to the guard.

Fire Emergency - Continued

The following personnel will remain in the department to shut down the process equipment:

Line I Mill Operator - Headcounter
Dry Blend Compounder
Line III Mill Operator
Plasticizer Operator
Line V Mill Operator

The Line I Mill Operator will lead the evacuation of the above personnel after all equipment has been shut down. Normal procedure will be to evacuate to the Primary Evacuation Area, take a headcount and report as a group to the emergency scene. Again, the headcount results must be reported to the guard.

MECHANICAL DEPARTMENT

MAINTENANCE

Monday Through Friday, 7:00 A.M. to 3:30 P.M.

All Maintenance Supervisors, the Maintenance Engineer, and all hourly personnel will report to the Primary Evacuation Area (Maintenance Shop). The Maintenance Superintendent will be responsible for performing the headcount and will report the names of those individuals not accounted for to the guard.

Headcount Backup - The Maintenance Engineer will be responsible for headcount should the Maintenance Superintendent not be available. If both the Maintenance Superintendent and Maintenance Engineer are absent, the I&E Supervisor will be responsible for headcount.

Evacuation Backup - The secondary evacuation point is the guard house and will be used in the event conditions make the maintenance shop unusable. Should both the shop and the guard house become inaccessible, the east gate (by the drum storage area) will be used for evacuation.

ALL OTHER SHIFTS

During all other shifts, Maintenance personnel (excepting the Shift Mechanic) will report to the guard house for headcount purposes, after reporting to the guard, the personnel will go to the Primary or Secondary Evacuation Points (described previously) until released. When arriving at the plant, the Mechanical Chief will check the time cards to confirm the accounting of all personnel.

UTILITIES

In all cases, the Utility Technicians will evacuate to the boiler house and notify the guard as to their location.

CONTRACT PERSONNEL

Contract personnel will go to the Primary Evacuation Point and report to their supervisor. After reporting at his evacuation area, the Senior Draftsman will consolidate the contractors' reports and report to the guard. The Senior Mechanical Engineer will be the backup for these duties.

Evacuation Areas

Primary - Visitor parking area north of guard house.

Secondary - East gate (by drum storage area).

LABORATORY

The Primary Evacuation Area for laboratory personnel is the radio area of the lab. If this area is contaminated, lab personnel shall proceed to the guard house and assemble as a group. Any visitors must be escorted to their point of entry to clear their name from the visitor log.

WHEN THE EMERGENCY ALARM SOUNDS - All lab personnel are to assemble at the primary evacuation area for a headcount. Two personnel are to be dispatched to the vinyl control room with the first aid equipment and the lab portable radio. They are to notify the Dryer (or Reactor) Lead that they are available and waiting north outside the control room (just inside the north door in bad weather or in event of toxic gas outside). The remaining lab personnel are to remain near the radio for immediate dispatch as needed. When an ambulance is needed, one of the lab personnel may be dispatched to the gate to escort the ambulance along a safe route to the scene.

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VINYL

Non-Vinyl Emergency

All personnel are to report to the Primary Evacuation Area at the concrete pad north of the Vinyl control room. The Old Module Lead Operator will be responsible to account for all personnel. A status of all personnel will be given to the Vinyl Shift Supervisor as soon as possible with missing personnel reported to the guard.

The people that are to report to this area are:

- Chief Operator
- Old Unit "A" Operator
- New Unit "A" Operator
- Dryer "A" Operators (2)
- Yard Operator
- General Helpers assigned to Vinyl
- Shift Mechanic (off-hours)

An alternative to reporting to the area would be to contact the lead operators by radio with the operator giving his position. All operators must report either in person or by radio. The Old Module Lead Operator will report the headcount results to the guard.

After the headcount has been done, the Vinyl Emergency Crew will assemble to respond to the emergency.

Vinyl Emergency

During an emergency in Vinyl, the Emergency Crew will assemble at the scene of the problem with the Vinyl Shift Supervisor reporting personnel status of the Crew to the Old Module Lead Operator. The reactor "A" operators are to report in person to the Supervisor if the problem is in their unit, or in person or by radio to the Lead Operator if the problem is not in their unit.

The Old Module Lead Operator will be responsible to account for all personnel. All personnel not on the Emergency Crew are to report to the Primary Evacuation Area. The only exception will be the reactor "A" operators as previously discussed. The remaining personnel include:

- 1) Yard Operators
- 2) General Helpers assigned to Vinyl
- 3) Shift Mechanic (off-hours)

The Yard Operator will escort outside truck drivers to the guard to clear their name from the entry log after all engines have been shut down for all non-yard related emergencies.

In the case of an emergency in the VCM tank farm, the Yard Operator is to report to the Primary Evacuation Area to be counted and will then proceed to the tank farm.

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VINYL - Continued

Vinyl Emergency - continued

If the Primary Evacuation Area is declared unsafe, proceed to the Secondary Evacuation Area near the guard gate. If the guard gate cannot be used (due to hazardous vapors), the east gate will be open for an evacuation exit.

Tornadoes

Tornado Alert or Watch

A tornado watch issued by the Weather Bureau warns that conditions exist for tornadoes to develop. The weather radio should be monitored closely if Monroe County is included in the watch area.

Tornado Warning

A tornado warning is issued by the Weather Bureau after a tornado has been sighted. Once a tornado warning has been issued that includes Monroe County, all reactors are to be killed using normal kill procedures. The possibility of a power failure will be large so preparation according to the Power Failure Procedures should be followed. No reactor will be charged back until the tornado warning has been lifted.

If a tornado is within sight of the plant with reactors not killed, use the emergency AMS system in the automatic mode. Monitoring levels of AMS added will be of little concern. Secure the recovery systems and all fired equipment (dryers and incinerator). Evacuate personnel to a safe area away from the reactor areas.

ADMINISTRATIVE SERVICES DEPARTMENT

This plan is intended to provide the guidelines necessary to:

1. Assemble department personnel in the designated evacuation area;
2. Designate an individual responsible for performing and reporting the results of the personnel headcount;
3. Provide guidance to department employees on actions to take in response to emergency situations.

An emergency situation is defined as, but not limited to, the following:

1. Fire;
2. A release of toxic, flammable or corrosive materials; or,
3. Explosion.

Emergency Action

In the event of an emergency situation, department personnel should take no action other than reporting the situation to the Vinyl control room and clearing the area. When clearing the area, care should be taken not to take any action which would impede the action(s) of emergency crews responding to the situation or which would endanger the health and safety of the employee or emergency crews. Such action would include, but are not limited to:

1. Failure to shutdown internal combustion engines or electrically powered operating equipment, or
2. Entering or passing through contaminated areas.

Assembly

When notified that an emergency situation exists, department personnel are to assemble in the department evacuation area which is located:

1. During normal working hours: Beneath the canopied entrance to the main warehouse adjacent to the administrative offices.
2. Outside normal working hours (after 4:15 p.m., on weekends and holidays): At the main gate guard house.
3. If primary evacuation area (1 or 2 above) is contaminated: Along the fence east of the parking lot and south of the guard house. If the guard house area is contaminated, the alternate secondary evacuation area is the east Transportation warehouse gate.

ADMINISTRATIVE SERVICES DEPARTMENT - Continued

Assembly - continued

4. The Receiving and Warehouse leads are to escort outside truck drivers to the guard to clear their name from the entry log after all engines have been shut down.

If further evacuation is necessary, personnel will be instructed to move to a safe location along the property line north of the plant.

Personnel movement to an evacuation area should be orderly and by the most direct route available. Care should be taken when approaching a contaminated area. The rule of thumb is to move around the contaminated area at right angles to the prevailing wind keeping yourself between the wind and the source of contamination. Wind direction may be determined by observation of the wind socks located atop silos 417 and 281 or slurry blend tank 502.

Headcount and Reporting

Immediately upon reporting to the appropriate evacuation area, the Purchasing/Warehouse Supervisor must commence a headcount of all assigned personnel. After completion and reconciliation of the headcount, a report of all missing personnel by name(s) and the last known location(s) must be made to the security guard. In the absence of the Purchasing/Warehouse Supervisor, responsibility for the headcount shall pass to the following personnel in numerical order.

1. Plant Accountant
2. Stores/Warehouse Supervisor
3. Materials Coordinator

Personnel working outside normal working hours, on weekends or holidays will be counted by the lead warehouse person. A report of missing personnel, of those reporting to work, will be made to the security guard as stated above.

(A)

MAIN OFFICE PERSONNEL⁽¹⁾

DURING REGULAR WORKING HOURS

Primary Evacuation Area: Main Office Lobby

Secondary Evacuation Area: Guard House

HEADCOUNT

Responsibility:

Primary: Senior Mechanical Engineer
Alternate: Senior Process Engineer

The following will be accounted for:

Production Schedulers
Mechanical Engineers
Process Engineers
Drafters
Director of Environmental Control
Employee Relations Assistant
Secretaries
Visitors as noted in main office log book

The following other main office personnel have other responsibilities to attend to and the headcount will be made as part of the emergency organization:

Plant Manager
Plant Superintendent
Employee Relations Director
Vinyl Operations Superintendent
Compound Operations Superintendent
Mechanical Superintendent
Chief Process Engineer

The Operations Engineers will report to their departments' evacuation area.

OFF-SHIFT

All main office personnel and visitors must log in and out at the guard house. The primary evacuation area for off-shift personnel is the guard house. The guard is responsible for checking the log book and accounting for personnel during an emergency evacuation.

- (1) Includes visitors for which main office personnel are responsible. All visitors must sign in and out. If during normal working hours at log book in lobby; if off-hours, at guard house. Personnel on test runs will be informed of evacuation responsibilities by the individual responsible for the test run.

ATTACHMENT E
POWER FAILURE PROCEDURES

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POWER FAILURE PROCEDURES

I. INTRODUCTION

When a power failure occurs, the first consideration is the in-plant personnel and secondly, to secure the plant. When power is lost, the reactor agitators stop and cooling tower pumps and fans are lost. This makes each reactor in the polymerization mode a potential runaway reactor where the pressure and temperature may rise significantly and uncontrollably. Most power failures are of short duration (just a few seconds) but occasionally an extended power outage will occur. All shift personnel must know what action to take in either situation. These procedures will be outlined in this manual along with steps to take once power is regained.

II. UNEXPECTED AND EXPECTED POWER FAILURE PREPARATIONS

Unexpected power outages are hard to plan for. Preparations can be made for expected power outages that could result from the presence of threatening weather such as thunderstorms.

- A. Weather Awareness - All operating personnel should be appraised of upcoming weather conditions. There are two ways to do this: the first is just looking at the cloud patterns and current conditions; the second is the weather alert radio monitor in the Vinyl Shift Supervisor's office which will sound an alarm as severe weather approaches our area. The chance of a power outages increases during thunderstorms and we should prepare ourselves accordingly.
- B. Dress For the Occasion - If thunderstorms are approaching, operations personnel should be prepared by getting rainsuits on in advance of rain downpour. All shift supervisors, chief operator, and reactor "A" operators should always carry a radio when outside the control room, regardless of the weather. All field personnel should have a flashlight and a pair of channel locks.
- C. Double Check Emergency AMS Systems - Prior to thunderstorms, all Emergency AMS Kill Systems are to be double checked. It is important that these systems work when needed.
- D. Preload Catalyst Bombs - Preload catalyst bombs of each reactor in polymerization mode with kill solution. This will allow these reactors to be killed on a timely basis if the decision is made to kill reactors early.
- E. Panel Operator Precautions - In the event of imminent severe weather, the panel operator in each module should take the following precautionary measures:

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II. UNEXPECTED AND EXPECTED POWER FAILURE PREPARATIONS - Continued

E. Panel Operator Precautions - continued

- Normally kill any reactors which have been running at least four hours (three for D-700 and 745). These reactors will have a fair amount of resin conversion and will be one less reactor to worry about should a power failure occur.
- Do not charge any reactors back until the weather front has passed and charging is approved by the shift supervisor.
- If possible, hold an empty reactor in each module down and under a vacuum. This will allow you to vent a reactor to another if necessary.
- Keep a mental track of which reactors would need to be killed first and keep your shift supervisor, chief operator, and reactor "A" operator advised of which reactors he will have to kill and in what order if the power does go out.

F. Reactor "A" Operator Stationing - As severe weather approaches, the "A" operator for each module is to be stationed in that module and be prepared to manually kill reactors as necessary.

G. Shift Supervisor and Chief Operator Stationing - Shift supervisors and chief operators should be in the control room or in their assigned module.

Shift Supervisor - Old Module

Chief Operator - New Module

H. Panel Operator Stationing - All panel operators should be at their respective panel station.

I. Yard Operator - As severe weather approaches, the Yard Operator should shut down all VCM unloading compressors and block in each liquid and vapor line. Contact Shift Supervisor or chief lead after this is done.

III. WHEN THE POWER GOES OUT

A. Short Duration Outage - Most of the power outages at the plant are of short duration (a few seconds). Actions during this time period mainly involve restarting equipment (reactor agitators, cooling tower pumps and fans, incinerator, etc.) but do not normally require use of the emergency systems. Panel operators should closely monitor each reactor during the time frame of the power outage and when power is restored to ensure that the agitator restarts, cooling water flow is re-established, and the polymerization reaction is under control. Reactors can be bumped/killed with AMS using the normal injection system if needed.

(A

III. WHEN THE POWER GOES OUT - Continued

B. Extended Power Outage

a) Panel Operator Response

- Reset all panel alarms.
- The dryer panel operator is to turn on the emergency power systems by turning on the toggle switch in the supply room for the emergency lighting generator and place the battery pack in emergency by throwing the switch into the "Emergency" position.
- The dryer panel operator is to be the timekeeper on how long the power has been out, and communicate this information with reactor panel operators.
- The reactor panel operators should relay the status and pressure of each reactor to the affected field personnel.
- Reactor kill guidelines during a power failure:
 - Bump 5265/5305 batches using manual mode of "AUTO" system within thirty seconds after the power is lost. These products run at higher pressures and an increase in pressure in these reactors is more critical. Have shift supervisor or chief lead check outage in AMS pots to verify addition to reactor.
 - You will have between one and two minutes to kill the remaining reactors. All reactors must be killed within two minutes.
 - Reactors which have run the longest and those just reaching heat-up will tend to run away first.
 - Once a reactor starts to run away, it will become increasingly difficult to kill. The reactor contents stop swirling after three to four minutes and AMS injection is much less effective at this time.
 - The automatic kill system should be used in the "Manual" mode to add short AMS injections to a reactor. The field personnel should verify addition by monitoring the level in the sightglass on the AMS Emergency Kill pots. If addition is not successful through the automatic AMS line, the manual addition system should be used.
 - The "Auto" mode of the automatic system should be used as a last resort. If repeated short AMS injections are not successful in controlling the polymerization reaction (in conjunction with use of the Emergency Cooling Water System), the "Auto" mode should be used which will inject the entire AMS pot contents into a reactor.

III. WHEN THE POWER GOES OUT - Continued

B. Extended Power Outage - continued

a) Panel Operator Response - continued

- After approximately five minutes (time necessary to activate the Emergency Instrument Air System), the Emergency Cooling Water System can also be used for reactor control. The Emergency Cooling Water System supplies enough cooling capacity for one reactor in each module. Do not use the Emergency Cooling Water System if there is inadequate firewater available to fight an existing fire since the diesel pumps supplying emergency cooling water also supply water to the plant's firewater system. Operating procedures for each reactor module are as follows:

New Module

1. Close CV-104 (New Module Recovery Cooling Water Supply Valve) by using the switch located on the new module recovery panel.
2. Open CV-102 (New Module Emergency Cooling Water Supply Valve).
3. Open the cooling water control valve on the reactor condenser that is to be supplied with emergency cooling water. Close off other cooling water control valves in the new module by placing the individual reactor cooling water flow controller in manual and setting the output at 0%.
4. Emergency cooling water flow can be switched from one reactor condenser to another by opening and closing appropriate cooling water control valves.

Old Module

1. Open CV-101 (Old Module Emergency Cooling Water Supply Valve) by using the switch located on the new module recovery panel.
2. Open the cooling water control valve on the condenser that is to be supplied with emergency cooling water. (Close all other cooling water control valves in the old module by placing the individual reactor cooling water flow controller in manual and setting the output as 0%.
3. If cooling water is needed for D-300 and D-400, open CV-103 (Emergency Cooling Water Supply Valve for D-300/D-400).

III. WHEN THE POWER GOES OUT - Continued

B. Extended Power Outage - continued

a) Panel Operator Response - continued

Old Module - continued

4. Emergency cooling water flow can be switched from one reactor condenser to another by opening and closing the appropriate cooling water control valves.
 - Switches for major equipment such as recovery vacuum pumps and compressors, charge pumps, etc. should be switched off to minimize a potential power surge when power is regained.
 - If power is lost during a charge, take all pumps out of "AUTO" position or charge will restart when power is restored.

C. Reactor "A" Operator Response

- If you are not on top of the reactors when the power goes out, you should go there immediately. The only exception is if the shift supervisor determines that the weather is too severe for the reactor "A" operator to safely climb to the top of the reactor structure. The reactors will be killed using the "Manual" mode of the automatic AMS Kill System. This mode allows for short AMS injection through the automatic kill line.
- The 5265 or 5305 batches running will be bumped with AMS during the first thirty seconds of the power failure by using the "Manual" mode of the automatic AMS injection valves for two seconds or until the shift supervisor or chief operator gives instructions to close the valves.
- The shift supervisor or chief operator will be stationed at the base of the reactor and will check that the AMS pot level has changed.
- When all reactor have been killed and are under control, assist the shift supervisor or chief operator in putting the duraseal systems on nitrogen, blocking in the mechanical seals on the recovery vacuum pumps and compressors, blocking in the VCM charge pumps, block in stripping steam supply to each reactor and to batch water strippers, and block in steam supply to blowdown tank. Monitor the nitrogen pressure on the duraseal systems. If the pressure does not hold, it will be necessary to block in the reactor seals.

A

III. WHEN THE POWER GOES OUT - Continued

D. Shift Supervisor and Chief Operator Responsibility:

- If you are not at the base of the reactors when the power goes out, go there immediately.

Shift Supervisor - Old Module

Chief Operator - New Module

- You will be responsible for monitoring the pots and making sure AMS gets in when the panel operator kills a reactor.
- The panel operator directs reactor killing from the control room. The shift supervisor may elect to kill reactors earlier at his discretion if in his judgement the situation is serious enough to do so.
- When all reactors have been killed and are under control, assist the reactor "A" operator in putting the duraseal systems on nitrogen, blocking in the catalyst injection systems, blocking in the mechanical seals on the recovery vacuum pumps and compressors, blocking in VCM charge pumps, block in stripping stream supply to each reactor and to the batch water strippers and block in steam supply to blowdown tank. Monitor the nitrogen pressure on the duraseal systems. If the pressure does not hold, it will be necessary to block in the reactor seals.
- The first responsibility of the "A" operators assigned to drier room is to start-up the Emergency Instrument Air System as soon as possible. The reactor panel operators cannot use the Emergency Cooling Water System until instrument air pressure is established. Cooling water is essential to reactor control. Start-up procedures for the Emergency Instrument Air System are as follows:
 1. Check to see if the generator is operating. The generator should start automatically on power failure. If the generator is not running, make sure the starting mode switch on the generator's control panel is in the "Auto" position. If the generator still will not start, check the trouble indicating lights on the generator's control panel to determine the problem.
 2. Close the chain operated 3" cooling water valve located under walkway west of the Deltech building.
 3. Start the sump pump supplying cooling water to the Joy reciprocating air compressors and Deltech air dryer. This pump is the east - most pump on the north side of the chiller building.

III. WHEN THE POWER GOES OUT - Continued

D. Shift Supervisor and Chief Operator Responsibility - continued

4. Start the Deltech air dryer by pressing the local "Start" button on the dryer's instrument panel. If the dryer does not start, press the "RESET" button on the instrument panel and then the "START" button. If the dryer does not start, start air compressors.
 5. Start either no. 8 or no. 9 air compressor, located northwest of the Deltech building, by pressing the local "START" button.
 6. After the compressor has started and the air system pressure has risen to at least 40 psig, notify the vinyl control room that the Emergency Instrument Air System is operating and that the Emergency Cooling Water System can now be used.
- After the Emergency Instrument Air System has been started up and instrument air pressure has been established, the dryer "A" operators should then block in all blend tank aeration lines. This will prevent slurry from backing into the air lines. Also close slurry supply valves from each blend tank.

E. Yard Operator

- Lock out silo unloading valves to prevent valves from operating.

IV. WHEN THE POWER COMES ON

A. Panel Operator

- Check with shift supervisor, chief or "A" operator to see if duraseal units and mechanical seal purge water pumps have been restarted and that duraseal and lip seal flow to each reactor seal has been established. If so, restart agitators.
- The dryer panel operator should turn off emergency lighting generator and reset battery pack power to normal mode.
- Set up cooling water system to normal operating position by opening/closing Emergency Cooling Water valves.

B. Reactor "A" Operator

- Set up reactor agitator seals to normal operating position. Restart duraseal units and check reactor seals.
- Set up the VCM charge pumps to normal operating conditions.
- Set up mechanical seals on the recovery vacuum pumps and compressors to normal operating conditions.

A

IV. WHEN THE POWER COMES ON - Continued

B. Reactor "A" Operator - continued

- Check all catalyst ram valves to be sure all are closed and then set up injection systems to normal operating positions. The "RESET" switch must be depressed before the ram valve will operate.
- Measure and record outage in each of the AMS kill pots. Relay this information to shift supervisor or chief operator. Refill each pot to proper level.

C. Shift Supervisor and Chief Operator

- Restart cooling tower pumps and fans.
- Restart the incinerators.
- Contact reactor "A" operators for outages in each AMS kill pot.
- Reset deluge diesel fire pumps.
- Once the threat of power outage has passed, instruct utility operator to return instrument air system to normal operating positions. The utility operator should also be told that the cooling water system has been returned to normal so that he can start chemical treatment of the water to prevent possible scaling in heat exchangers and condensers.

D. Dryer "A" Operator

- Once air pressure has been re-established, set up blend tank aeration.
- Flush slurry lines.
- Restart all equipment, one dryer line at a time.
- Empty cones on fluid bed.

Once the power outage has passed and all systems have been returned to normal, the decision must be made as how to process the emergency killed batches. Accurate outages from all AMS kill pots are essential in determining what steps to take. The Vinyl Operations Supervisor or Superintendent will make the decision as to how each batch is to be handled.

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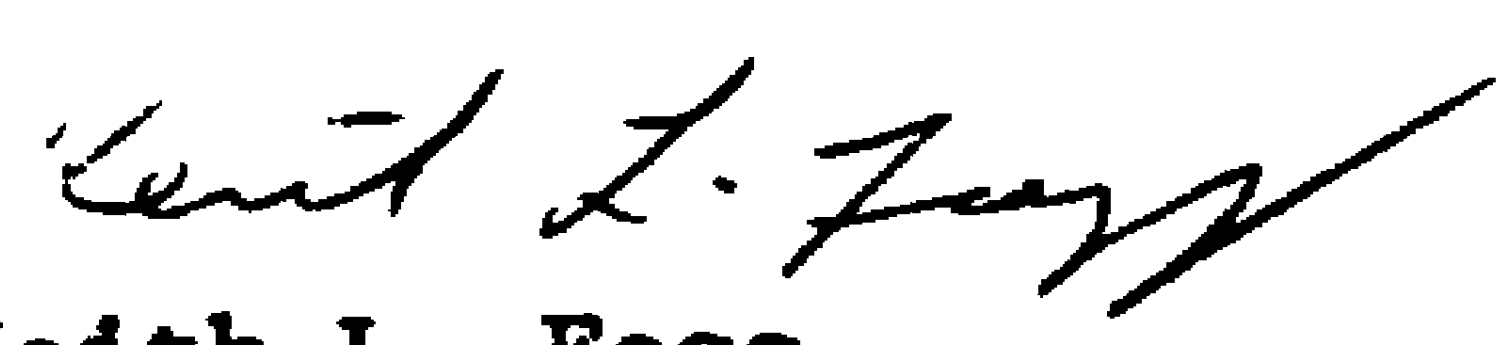
From: K. L. Fogg
Date: February 5, 1988

Subject: SAFETY PERMIT PROCEDURES

Interoffice
Communication

VISTA

Attached are VSP 006, VSP 007, and VSP 008. Please place these in your Safety and Health Manual and train your people as appropriate.


Keith L. Fogg
Safety Director

rah

attachment

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