

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

October 14, 1988

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Contents

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

RCRAHAZARDOUS WASTE CONTINGENCY PLANI. 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 PLANII. 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>
Ted Nickerson - Primary	3635	369-9025
Charles Worlow - Alternate	3657	369-2269
Frank Jeanson - Alternate	3637	1-324-2329
Bruce Trego - Alternate	3618	1-327-8673
Bob Seymour - Alternate	3606 3607	369-4412
Doug Skokna - Alternate	3610	1-327-0679

API SEPARATOR

Ted Lyon - Primary	3622	1-329-2721
Dan Miller - Alternate	3625	369-6005
Frank Jeanson - Alternate	3637	1-324-2329
Bruce Trego - Alternate	3618	1-327-8673
Bob Seymour - Alternate	3606 3607	369-4412
Doug Skokna - Alternate	3610	1-327-0679

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 Environmental Coordinator.

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:

Safety Director	Bruce Trego	1-327-8673
Environmental Coordinator	Frank Jeanson	1-324-2329
Chief Process Engineer	Veldon Messick	1-327-0741
Senior Process Engineer	Rendell Newton	1-328-0904
Senior Process Engineer	Steve Hillman	369-7892
Plant Superintendent	Doug Skokna	1-327-0679
Plant Manager	Bob Seymour	369-4412
Vinyl Operations Superintendent	Paul Kober	369-7096
Compound Operations Superintendent	Ted Nickerson	369-9025
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.