

PROCEDURE BULLETIN — TEXAS CITY PLANT P-0143

REPORTING SPILLS AND ACCIDENTAL RELEASES

PLAINTIFF'S EXHIBIT

MON-1425

I. PURPOSE

The purpose of this bulletin is to describe the procedures for reporting spills and accidental releases in keeping with the Corporate guideline dated September 15, 1980, by the Environmental Policy Committee.

II. POLICY

The Texas City Plant management will report in a timely fashion, as appropriate, all spills and accidental releases from the plant as required by law or by Corporate, social responsibility, policies and practices. The Plant Manager will be the person with the primary responsibility for reporting the spills or releases. The Superintendent, Plant Services, and the Superintendent, Personnel, will serve as backup. All other local functional heads will be responsible for providing the appropriate information necessary to comply with the guideline. Each functional head will become familiar with its reporting obligations and add any local reporting requirements which should be included. The list of federal, state and local agencies and non-regulatory contacts that should be made in the event of an incident will be maintained as a part of the plant Emergency Procedure Plan.

III. SCOPE

Plant spills or accidental releases requiring reporting to persons outside the Monsanto plant are expected to be one of the following categories:

1. Those that are reportable under federal, state or local regulations that apply to the plant.
2. Those that pose any hazard to health or environment regardless of any legal reporting requirement.
3. Those that, because of appearance or odor outside the plant fence line, could cause alarm to citizens or local governmental agencies.

If there is any doubt whether an incident should or should not be reported, it will be reported. If necessary, guidance will be provided by Environmental Counsel or the Operation's Company Director of Environmental Operations in St. Louis. The names and telephone numbers of these individuals are listed on pages F-1 and F-2 of the "Monsanto Press Relations Manual". A copy of this list is attached.

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IV. RESPONSIBILITIES

A. Plant Manager

Whenever a reportable spill or release occurs, the Plant Manager will report the incident and subsequent action to the following persons:

- General Manager, Manufacturing, MCI
- The MIC Director of Environmental Operations
- The MCI Director of Public Relations
- The Chocolate Bayou Plant Manager

As a minimum, the report to be presented to the above persons will include the nature of the incident, the time of the incident, the time of all reports to agencies or organizations outside the company and the eventual resolution of the incident. This report will be made, as soon as possible, on the day of the incident or the following business day morning if the incident occurs during non-office hours.

B. Superintendent, Plant Services

The Superintendent will notify federal, state and local governmental agencies of the event, as soon as possible, under the reporting requirements of these agencies. As a minimum, these reports will include the nature of the incident, the time of the incident, the time of all reports to agencies or organizations outside the company and the eventual resolution of the incident.

C. Superintendent, Personnel

The Superintendent will transmit accurate and complete information to the Public Relations Department for MCI, St. Louis, press, radio, television and wire services as soon as possible, making certain that all sources have such news following up with all developments and changes. He will also handle outside calls that are the general nature and not directed to any definite source. He will keep all details of this plan up-to-date with current phone numbers and personal contacts with members of the press. He will also compile reference material on the plant for distribution in times of an emergency.

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D. Loss Prevention and Safety Superintendent

The Superintendent will report the incident and subsequent action to:

- Safety and Property Protection Section of Manufacturing Coordination--St. Louis.
- Texas City Mutual Aid members, as appropriate.
- Dr. James H. Spraul, Senior Physician, Occupational Medicine, Department of Medicine and Environmental Health in St. Louis, if medical problems are involved.
- Corporate Insurance Department--To be contacted only when injury or death occurs.
- Other Monsanto Safety Superintendents, as appropriate.

V. RELATIONSHIP TO THE EMERGENCY PROCEDURE PLAN

This reporting procedure will become a part of the Emergency Procedure Plan for reporting incidents and events. In the absence of any of the principals responsible for the reporting, their replacements under the Emergency Procedure Plan would fulfill the responsibilities outlined in this bulletin.

The protocol and list of names and telephone numbers of persons to be called will be maintained by Superintendent, Personnel, for the Texas City Plant.

Prepared by:

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Reviewed by:

PMSB

Approved by:

Don Kaldenberg
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G.L. Tromblee
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APPENDIX A
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REPORTING SPILLS AND ACCIDENTAL RELEASES

PROTOCOL FOR REPORTING SPILLS AND ACCIDENTAL RELEASES

CALLS TO BE PLACED BY THE PLANT MANAGER:

	<u>Office</u>	<u>Home</u>
General Manager, Manufacturing, MCI		
Earl N. Brasfield or	(314) 694-8708	(314) 432-4240
Glen L. McKee	(314) 694-8792	(314) 532-7962
Director of Environmental Operations		
W.B. Papageorge or	(314) 694-8125	(314) 878-3513
Manager, Environmental Affairs		
H.M. Keating	(314) 694-8171	(314) 821-4997
They will contact:		
● Environmental Counsel	Phocian S. Park	
● Legal - MCI		
Company Counsel		
W.A. Blase		
Asst. Company Counsel		
G.M. Macek		
● Planning and Information		
Director of Environmental		
Policy Staff	Barney J. Wander	
Public Relations, MCI		
John J. Spano, Director	(314) 694-8654	(314) 822-9423
Sarah Collins, Manager	(314) 694-8586	(314) 576-6930
Plant Manager, Chocolate Bayou		
Gordon E. Davenport	86-4201	(713) 331-3545
Mayor of Texas City		
Mayor Emmett F. Lowry	948-3111	(713) 945-9991

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PROTOCOL FOR REPORTING SPILLS AND ACCIDENTAL RELEASES

CALLS TO BE PLACED BY THE SUPERINTENDENT, PLANT SERVICES

	<u>Office</u>	<u>Home</u>
Texas City Police Department	Relay message through Fred Herzog (2343) or Night Supervisors.	
Industrial Wastewater Executive Director Texas Department of Water Resources P.O. Box 13087, Capitol Station Austin, TX 78711	(512)475-3187	
Air Quality Galveston County County Health Officer Environmental Division	Days Only (713)938-7221	
Executive Director Air Control Board 8520 Shoal Creek Blvd. Austin, TX 78758	(512)451-5711	
Solid Waste Executive Director Texas Department of Water Resources P.O. Box 13067, Capitol Station Austin, TX 78711	(512)475-3187	
County Officials (if appropriate) County Judge C. Ray Holbrook Commissioner, Precinct 4 Jack Lawrence	(713)766-2244 (713)948-2581	(713)945-7082 (713)945-2465
Monsanto Manager, Governmental and Environmental Affairs Fred C. Himes Texas City Chocolate Bayou During legislature, Austin	(713)945-4431, Ext. 3169 (713)581-2161, Ext. 4522 (512)473-6699	(713)333-2354 Houston

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PROTOCOL FOR REPORTING SPILLS AND ACCIDENTAL RELEASES

CALLS TO BE PLACED BY THE SUPERINTENDENT, PERSONNEL

	<u>Office</u>	<u>Home</u>
Director of Personnel, MCI		
J.R. Thurrott or	(314) 694-8601	(314) 527-9221
Joe A. Guidi or	(314) 694-8675	(314) 527-0143
Tom D. Redmond	(314) 694-8672	(314) 961-5870
Local Newspapers		
Daily Sun		
Editor, Dorothy Johannessen	(713) 945-3441	
LaMarque Times		
Dan Bradford	(713) 935-2431	
Galveston Daily News		
Les Daughtry	(713) 744-3611	
Local Radio Stations		
KYST--Texas City		
News Director, Marion Stein	(713) 945-4418	
Station Manager, Dave Wenger	(713) 945-4418	
Station Owner, Roy Henderson	(713) 945-4418	
KGBC--Galveston		
Vandy Anderson	(713) 744-4567	
KILE--Galveston		
News Director, Moss Thornton	(713) 762-8434	

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PROTOCOL FOR REPORTING SPILLS AND ACCIDENTAL RELEASES

CALLS TO BE PLACED BY LOSS PREVENTION AND SAFETY:

	<u>Office</u>	<u>Home</u>
Safety and Property Protection Section		
of Manufacturing Coordination Department--St. Louis		
Tom W. Lawrence or	(314) 694-6081	(314) 527-5646
Harvey W. Morgan or	(314) 694-6084	(314) 842-3065
Ray E. Witter	(314) 694-6007	(314) 567-4124

Department of Medicine and Environmental
Health (DMEH)

Senior Physician Occupational Medicine

Dr. James H. Spraul	(314) 694-8680	(314) 432-5107
	During non-office hours, contact	
	guard on duty at (314) 694-1000	
	and ask for the name and phone	
	number of the DMEH represen-	
	tative on emergency call. Also,	
	during normal office hours, in	
	absence of Dr. Spraul, contact	
	P.O. DeGarmo at (314) 694-2185.	

Dr. Kenneth Christian
Texas City 948-1194
at Plant - 2867

Corporate Risk Management (Insurance Department)
(To be contacted only when injury
or death occurs)

Robert E. Toth or	(314) 694-8581	(314) 536-1264
David A. Stryker	(314) 694-7553	(314) 536-1735

Key IMAS Contacts at other Texas City Plants

Lou Honeycutt	(713) 945-4411
Manager of Administration	
Gulf Chemical and Metallurgical Company	
P.O. Box 2130	
Texas City, TX 77590	

George Stapleton	(713) 948-3111
City of Texas City	
1801 - 9th Ave. N.	
Texas City, TX 77590	

E.E. (Gene) La Combe	(713) 948-1601
Safety Supervisor	
AMOCO Chemicals	
P.O. Box 568	
Texas City, TX 77590	

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LOSS PREVENTION AND SAFETY CONTINUED:

	<u>Office</u>	<u>Home</u>
E.A. Meaney AMOCO Texas Refining Company P.O. Box 401 Texas City, TX 77590	(713) 945-1011	
K.W. Woodward Director of Fire and Safety Texas City Refining P.O. Box 1271 Texas City, TX 77590	(713) 945-4451	
Barney Smith G.A.F. Corporation P.O. Box 2141 Texas City, TX 77590	(713) 945-3411	
Rodney J. Taylor Safety Director Union Carbide Corporation P.O. Box 471 Texas City, TX 77590	(713) 948-5335	
Joe Mangeno Marathon Oil Company P.O. Box 1191 Texas City, TX 77590	(713) 945-2331	
Alvin P. Wright Engineering Supt. AMOCO Gas Company P.O. Box 2609 Texas City, TX 77590	(713) 948-2501	

Also, call the Guard office at the Main Gate at 2343 and have them contact ARCO Ship Dock.

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SECTION F

PUBLIC RELATIONS DEPARTMENT

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Whom to Notify in an Emergency, Staff Members

If an emergency occurs to a company plant or other location, initial public relations contact should be made at once with the Public Relations staff member assigned to that unit. If the emergency has medical or environmental consequences, the appropriate Director of Environmental Operations (DEO) should be notified immediately. Responsibilities of Public Relations staffers, and DEOs, all at the World Headquarters (800 N. Lindbergh Blvd., St. Louis, Missouri 63166) except as indicated, are as follows:

MONSANTO AGRICULTURAL PRODUCTS COMPANY

		<u>Office</u>	<u>Home</u>
Director, PR	Joe Orr	(314) 694-2866	(314) 527-2999
Manager, PR	Bob Neunreiter	(314) 694-2957	(314) 821-7944
DEO	W. D. Carpenter	(314) 694-3928	(314) 227-6511

MONSANTO CHEMICAL INTERMEDIATES COMPANY

Director, PR	John Spano	(314) 694-8654	(314) 822-9423
Manager, PR	Sarah Collins	(314) 694-8586	(314) 576-6930
DEO	W. B. Papageorge	(314) 694-8125	(314) 878-3513

MONSANTO INDUSTRIAL CHEMICALS COMPANY

Director, PR	Bob Isham	(314) 694-2621	(314) 469-1983
PR Representative	Glynn Young	(314) 694-2889	(314) 567-1047
DEO	C. F. Callis	(314) 694-4471	(314) 872-8842

MONSANTO PLASTICS & RESINS COMPANY

Director, PR	Tom Newcomb	(314) 694-3497	(314) 394-5139
PR Manager	Fred Marshall	(314) 694-2915	(314) 527-5681
DEO	R. W. Kienker	(314) 694-3146	(314) 432-6697

MONSANTO TEXTILES COMPANY

Director, PR	Carl Moskowitz	(314) 694-8664	(314) 576-5635
Mgr., New York PR	Mary Fennell	(212) 764-4594	(201) 447-5857
DEO	P. H. Hobson	(314) 694-8728	(314) 469-1249

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(Contact Dan Bishop, Corporate P.R.

(314) 694-2891

(314) 432-2030

DEO, Marshalltown

J. Bruce Duncan

(515) 754-3658

(515) 752-4716

INTERNATIONAL DIVISION**Director, PR****Ed John**

(314) 694-3218

(314) 567-3628

If the Public Relations staffer assigned to the operating company or other unit involved in the emergency cannot be reached, contact should be made with one of the following members of the News Bureau, in the Corporate PR Department, St. Louis:

Name**Office Phone****Home Phone**

Don Berns, Mgr., Media Relations

(314) 694-2740

(314) 481-1232

Gerry Ingenthron, Dir., News Bureau

(314) 694-2883

(314) 569-0359

Others at the World Headquarters in St. Louis available for public relations counsel are as follows:

Name**Title****Office****Home**

Dan Bishop

Director, Env. &
Science Comms.

(314) 694-2891

(314) 432-2030

Jim McKee

Director of PR

(314) 694-2864

(314) 965-5668

David Crosson

Mgr., Environmental
Communications

(314) 694-3860

(314) 227-4986

Gary Barton

Mgr., Science
Communications

(314) 694-2893

(314) 892-8978

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