

Section I – Plan Introduction Elements

1. Purpose and Scope of Plan Coverage

Ethyl Petroleum Additives, Inc. is a manufacturer of lubricant and fuel additives products. The additive manufacturing process involves blending or reacting various chemical raw materials in vessels or tanks to produce intermediate or final additive products. These products are further processed or are packaged and shipped to the customers in drums, tank trucks and railcars.

This *Integrated Contingency Plan* (ICP), also referred to as the “Emergency Plan” or the “Plan”, applies to the Ethyl Petroleum Additives, Inc. facility located at 501 Monsanto Avenue, Sauget, Illinois. This plan contains emergency contingency planning and response information for all operating units, buildings and structures located at this address.

Purpose

The purpose of this plan is to:

- Prevent injury to employees, contractors, visitors, emergency response personnel and the community in the event of a plant emergency.
- Minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water.
- Designate actions Ethyl and its employees, contractors and visitors must take to ensure employee safety from fire or other emergencies. Define personnel roles, lines of authority, training and communication requirements necessary to effectively respond to a plant emergency.
- Define anticipated emergencies prior to commencement of emergency response operations and communicate plant emergency “pre-plans” with local public safety agencies, industrial mutual aid organizations and other external organizations with an emergency response mission.
- Establish guidelines for compliance with applicable government regulations and standards and ensure that appropriate records are maintained.
- Minimize disruption to plant operations and economic consequences resulting from an emergency situation.

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Scope

This contingency plan applies to the following emergency situations:

- Medical and rescue emergencies
- Fire or explosion
- Hazardous & nonhazardous chemical spills or releases (small and large)
- Hazardous & nonhazardous waste spills or releases
- Civil or employee disturbances
- Bomb threats
- Natural disasters including earthquakes, tornados, lightening strikes and floods
- Utility outage including electricity, natural gas, water, air and nitrogen.
- Radiation source emergencies
- Media / Government Agency / Community Information requests
- Odor Complaints
- Ethyl products and mutual aid requests

This plan will be immediately activated whenever the above conditions occur or there is a fire, explosion or release of hazardous waste or waste constituents which could threaten human health or the environment.

Regulations Applicable to this Plan

This Integrated Contingency Plan (ICP) applies to the following regulations:

- OSHA 29 CFR 1910.38(a) – Employee Emergency Action Plans
- OSHA 29 CFR 1910.119(n) – Process Safety Mangement of Highly Explosive Chemicals
- OSHA 29 CFR 1910.120 (q) – Hazardous Waste Operations and Emergency Response
- OSHA 29 CFR 1910, Subpart L – Fire Protection
- EPA 40 CFR 68 – Risk Management Programs for Chemical Accidental Release Prevention
- EPA 40 CFR 264 / 265 Subpart D – Resource Conservation and Recovery Act (RCRA) Contingency Planning Requirements
- EPA 40 CFR 302.6 – Notification Requirements
- EPA 40 CFR 355.30 – Facility Coordinator and Emergency Response Plan
- EPA 40 CFR 355.40 – Emergency Release Notification

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Ethyl Corporation Safety Vision and Goals

Vision:

Our vision is to be an organization in which safety is every employee's responsibility and each individual is committed to demonstrating safety excellence through intervention and personal example

Goals:

1. Provide a safe work environment
2. Maintain a work force committed to safety
3. Be in the top 10% of CMA companies by OSHA safety statistics

Characteristics of Safety Excellence:

- All accidents are preventable
- Individuals accept personal responsibility for their safety, the safety of their coworkers and their work site.
- Management accepts and demonstrates that leadership in safety is their responsibility.
- Our approach to safety is proactive and identifies means for continuous improvement
- Safety performance is an indicator of overall company performance
- Safety is good business.

Emergency Incident Response Priorities

1. Life Safety
2. Protection of the Environment
3. Conservation of Property & Business Continuity

Sauget Plant Emergency Reponse Organization and Capability

Ethyl, Sauget plant, has 5 emergency response teams:

1. Emergency Coordination Team (ECT)
2. Emergency Response Team (ERT)
3. Crises Communication Team (CCT)
4. Sauget Emergency Rescue Team
5. First Aiders / Medical Response Team

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The *Emergency Coordination Team* is comprised of plant management and supervision and is responsible for incident command and directing all *strategic* aspects of a plant emergency response. The ECT is also responsible for establishing and staffing an *Emergency Operations Center* (EOC) in the event of a moderate or major plant emergency.

The *Emergency Response Team* is comprised of personnel trained in *tactical* aspects of emergency response including:

- Interior and exterior structural and non-structural firefighting
- Hazardous Materials (HAZMAT) response

This team will respond to the incident at the direction of the ECT as is under the direction of the Operations Officer.

The plant *Crisis Communication Team* (CCT) team is activated by the EOC manager during serious and/or long-term plant emergency. This team acts as a liaison between the facility and the affected community.

The *Sauget Emergency Rescue Team* provides confined space and high angle rescue services and the plant *First Aiders / Medical Response* team is drawn upon when needed during a medical emergency.

Plan Responsibilities

All **employees, contractors, & visitors*** are responsible for knowing the basic elements of the this plan:

- Emergency phone number
- Emergency radio frequency
- Alarms and their meanings
- Actions to take when the alarms are sounded
- Primary and secondary assembly points
- Primary and secondary evacuation routes
- Shelter-in-Place procedure
- Headcount procedure
- Department-specific process securement & emergency shutdown procedures

*Note: Visitors must be escorted at all times if they are not knowledgeable of their responsibilities as outlined above.

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In addition, all **department / unit supervisors and managers** (or designees) are responsible for the following elements of this plan:

- Training their employees on the basic elements of this plan
- Maintaining up-to-date employee evacuation roster (via gate logs, unit sign-ins, etc.)
- Assigning headcount coordinators and training on the headcount procedure
- Maintaining department / unit emergency shutdown procedures
- Maintaining an up-to-date copy of this plan in the department / unit / work area.
- Label, mark or otherwise identify emergency-critical utility or process equipment, lines or valves within their department / unit.
- Keeping all storage tanks conspicuously marked with the identity of it's contents and NFPA 704 rating diamond.
- Monitor radio or other plant communication devices in the event of an emergency, evacuate and report status of department / unit as needed or requested.
- Assuring periodic tests of process safety and emergency response equipment are conducted and documented.
- Assuring that impairments of fire alarms, sprinkler systems, safety showers, eye wash fountains, communication systems, and other emergency equipment within their department or unit are repaired promptly.

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D-21880: Building and Tank Locations – Key Map (D-21880)
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Plant Air System Distribution (D-21884)
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 - Safety Officer
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 - Planning Sector Officer
 - Logistics Sector Officer
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 - 1) Command Aspects
 - 2) Information
 - 3) Safety
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- c) Operations Sector Priorities
 - 1) Operational response objectives
 - 2) Discharge or release assessment / monitoring
 - 3) Containment
 - 4) Recovery
 - 5) Decontamination
 - 6) Non-responder medical needs, including information on ambulances and hospitals
 - 7) Salvage plans
- d) Public Information Officer (PIO) Sector Priorities
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 - 1) Hazard assessment, including facility hazards identification, vulnerability analysis, prioritiation of potential risks
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 - 2-Ethylhexanol
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 - Iso-butyl Alcohol
 - Iso-decyl Alcohol
 - Iso-propyl Alcohol

2. Anhydrous Ammonia
3. Benzene
4. Carbon Disulfide
5. Chlorine
6. Hexane
7. Hydrazine
8. Hydrochloric Acid
9. Hydrogen Peroxide
10. Hydrogen Sulfide
11. Isobutylene
12. Maleic Anhydride
13. Methanol
14. N-propyl Alcohol
15. Oleum
16. Phosphorus Pentasulfide
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5. Hazardous Chemical Monitoring System
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9. Rescue Van

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- 10. HAZMAT Trailer
- 11. Rescue Van
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- 14. EOC Uninterruptable Power Supply and Emergency Generator
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- B. Lists
- C. Zone Map
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3. Current Revision Date

New

01 June, 2000

By: Edward M. Cox

Last Revised

For more detailed information on plan update history (i.e. record of amendments) see Annex 6:
Response Critique and Plan Review and Modification Process

Plan Distribution & Location List

Internal

1. Environmental, Safety and Regulatory Affairs Manager
2. Regulatory Advisor (Master Copy Holder)
3. Environmental Specialist
4. Safety Manager
5. Site Manager
6. Operations Manager
7. Area I Manager
8. Area IIA Manager
9. Area IIB Manager
10. Area I Supervisor
11. Area IIA Supervisor
12. Area IIB Supervisor
13. Maintenance Manager
14. Q.C. / Logistics Manager
15. Human Resources Manager
16. Off Shift Supervisors
17. Technical Services (Engineering)
18. Corrigan (General Contractor)
19. Security-Main Gate
20. Security-Truck Gate
21. Plant Nurse
22. Quality Control Lab
23. Process Lab
24. Warehouse
25. Maintenance Shop
26. Control Room 258
27. Control Room 266

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28. Control Room 267
29. Control Room 270
30. Control Room 268
31. Control Room 275
32. Control Room 280
33. Control Room 283
34. Control Room 290
35. Boiler House
36. Corporate Communications
37. Corporate Environmental Affairs

External

1. St. Clair County ESDA
2. St. Clair County Sheriff
3. East St. Louis ESDA
4. East St. Louis Fire Department
5. East St. Louis Police Department
6. Cahokia ESDA
7. Cahokia Fire Department
8. Cahokia Police Department
9. Sauget Fire Department
10. Sauget Police Department
11. St. Mary's Hospital
12. Belleville Memorial Hospital
13. St. Clair Special Emergency Services Association

4. General Facility Identification Information

Facility Information

a) **Facility Name:** Ethyl Petroleum Additives, Inc.

b) **Owner/operator/agent:** Ethyl Corporation
330 S. Fourth St.
Richmond, VA 23219
(804) 788-5000

c) **Facility Location:**

Physical Address: 501 Monsanto Ave.
Sauget, Illinois 62201

County: St. Clair County

Latitude: 038°-36'-05"

Longitude: 090°-10'-08"

Directions:

From North: I-55/70 to Route 3 (So.) to Monsanto Ave. (left) to facility –or– East St. Louis 19th St. (South) to Monsanto Ave. (right) to facility.

From South: Route 3 (No.) to Monsanto Ave. (right) to facility –or– Falling Springs Rd (Cahokia) (North) to Monsanto Ave. (left) to facility.

From East: I-255 to Mousette Lane (exit) to Sauget Industrial Parkway (west) to Curtis Steinberg Dr. (right) to Falling Springs Rd. (right) to Monsanto Ave. (left) to facility.

From West: I-64 (US-40) across Poplar St. bridge (exit) Route 3 (South) to Monsanto Ave. (left) to facility.

d) **Mailing Address:** Same as (c) above

e) **Other Identifying Information:** D&B Number: 053969234

SIC Code: 2869

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NAIICS Code: 324191
EPA RCRA ID# ILD055871370
EPA RMP ID# 100000082928
EPA TRI ID# 62201-THYLP-MONSA
Illinois Waste ID# 1631210013
Illinois Air Permit ID# 163121AAB

a) Key Contact for Plan Development and Maintenance:

Edward M. Cox
Regulatory Advisor

f) Key Contact Phone Numbers: (618) 583-1078 – work
(636) 225-7443 - home
(314) 630-0345 – cellular
(618) 782-1927 – pager

g) Facility Phone Numbers: (618) 583-1000 (main swithboard)
(618) 583-1264 (main gate security office)
(618) 583-1254 (off-shift supervisor office)

h) Facility Fax Numbers: (618) 583-1088 (main gate security)
(618) 583-1388 (regulatory / off-shift supervisor office)

Emergency Response Organization

Key Response Personnel

