

Responses to Questions Asked
General Chemical Bay Point Community Forum, 1/31/06

Abbreviations

GC: General Chemical
 CCC: Contra Costa County government
 CCHS: Contra Costa Health Services, the county health department
 CHP: California Highway Patrol
 PCH: Port Chicago Highway
 MAC: Bay Point Municipal Advisory Council
 CalARP: California Accidental Release Prevention
 ISO: Industrial Safety Ordinance

(w): written comment submitted after the 1/31/06 public forum

1) GC on-site operations

Question	Response
Does GC make chemicals?	GC predominantly takes technical grade chemicals and purifies them to electronic grade. They also re-package chemicals into different size containers. They sell chemicals to certain industries, not to the general public.
What are GC's most dangerous chemicals?	Hydrogen fluoride is the most dangerous. After that, it would be the ammonia related materials (anhydrous ammonia, ammonium fluoride, ammonium hydroxide).
What is "secondary containment?" Do you inspect these tanks?	It means a tank within a tank, or an additional layer of protection such as a dike that surrounds a tank that is sized to hold the entire contents of the tank if it were to spill. Secondary containments are designed to hold more than the largest amount in a tank.
What drills does GC do?	GC performs shelter in place drills. Since GC's warehouse fire in April 2004, they have done more training to make sure people know what to do in an emergency.
What protects GC from flooding?	GC's site covers approximately 26 acres. It is surrounded by a levee system that was built when the plant was built. They have experienced some severe weather over the many years the facility has been there without problem. Most of the time after heavy rain, puddles develop on the property, but they drain fine. Recently, they had a significant amount of rainfall that resulted in storm water flowing over their dam into their lagoon.
What preparation for an earthquake has GC made?	Both the CalARP and the CCC ISO safety programs require facilities to perform a seismic assessment by a person

(w)	knowledgeable in the damage that could occur from an earthquake. The CCHS safety audit has confirmed that GC has addressed seismic requirements as part of this analysis; however, some corrective actions have not yet been implemented.
Does the GC Bay Point plant need to be on the river?	Response by GC: In terms of transportation capabilities, no. Their raw materials are brought in by both rail and truck. As one would anticipate, the higher volume raw materials are transported via rail, due to the economics of rail logistics. Finished product (i.e. the product that GC sells) is delivered to their semiconductor customers and distribution partners throughout the United States, via common carriers. GC does not operate any company-owned trucks. If the question relates to operation of the National Pollutant Discharge Elimination System (NPDES) lagoon, the answer would be yes, as that system is tied to the Suisun Bay. As an aside, GC is planning to terminate discharge via NPDES in May of 2007.

2) GC truck and traffic safety

Does CCHS perform safety checks on vehicles transporting chemicals?	No. CCC does not have the authority to perform these checks since it is administered through the Department of Transportation (DOT), but the CHP does safety checks on trucks carrying hazardous materials. CCHS does not perform checks on vehicles or rail shipments.
"That is the province of DOT" is a bad answer and evidences a bad attitude about safety. General Chemical should do safety checks on their trucks and drivers, and escort each truck along approved routes through the community. The most serious hazard this community faces is the transportation of these chemicals. (w)	Response by GC: All carriers used by GC are approved carriers. All such carriers must utilize drivers trained in the transport of chemicals. Furthermore, all bulk trailers utilized by GC go through a comprehensive annual inspection, in addition to routine checks completed on an on-going basis. Finally, drivers are instructed on proper and required routes out of Bay Point (i.e. not via Driftwood) before they depart the GC Shipping Department.
How do you control trucks that take alternate routes through residential neighborhoods when the primary roads are clogged or flooded? Is there any prospect of increased traffic	Response by GC: GC requires that all chemical truck drivers be known. They tell all of their drivers to only take PCH. GC has no way of knowing whether their truck drivers take alternate routes. Response by CCC Public Works: Signs were placed on PCH instructing drivers to not take alternate routes. There is no code for the County to cite a truck driver that disobeys the

enforcement	signs. Only the California Highway Patrol can cite the truck drivers. Chances are, though, that the truck will be long gone if you call the CHP. Response by CCC Community Development: CCC is working to address transportation issues in the Bay Point area and intend to develop a plan by the end of the year. All comments are welcome to assist with developing this plan.
Can we use these truck traffic problems to get PCH opened through the Naval Weapons Station?	All suggestions could help.
Is GC willing to transport hazardous waste shipments during non-business hours?	Response by GC: Yes. Everything so far indicates they should be able to do that easily since they only ship 3-4 shipments a month. GC is working with their supplier to avoid shipping during hours students normally travel to and from school.
Is PCH wide enough to handle the trucks on it?	Yes, the width of the road is adequate.
How would a truck spill of hydrofluoric acid in traffic be handled? (w)	CCHS would activate the Community Warning System and sound sirens in the area of the spill. CCHS would request people shelter in place and work with the Office of the Sheriff or the CHP on shutting down the road and blocking the area off. CCHS' Hazardous Materials (HazMat) Programs would assessthe leak and ways to stop the hydrofluoric acid from continuing to spill. The HazMat team has the capability to send people in with Level A suits ("moon suits") and plug the leak.

3) CCC and CCHS plans and enforcement

Is the list of companies you described a complete list of those that you audit?	The companies that are included within the County's ISO are: Chevron Richmond Refinery, ConocoPhillips Rodeo Refinery, Shell Martinez Refinery, Tesoro Golden Eagle Refinery, Air Products at the Shell Martinez and Tesoro Golden Eagle Refineries, and General Chemical in Richmond and Bay Point. There are approximately 50 facilities subject to the CalARP Program.
Why did CCHS take so long to present information from the 2003 audit?	In 1999/2000 timeframe, CCHS held several public meetings and got from 0-2 members of the public in attendance. CCHS worked with PACE and held a series of workshops in West County in 2001/2002 and increased the numbers to approximately 2-5 individuals. CCHS hired a consultant to perform outreach to community groups for six months in the Martinez and Bay Point areas and increased the meeting attendance to about 6 people even though the consultant had spoken to over 600 people. CCHS hired the

	<p>consultant again for another 6 months and increased meeting attendance up to 10 people. CCHS then formed an outreach committee and began attending health fairs, developed a comic book and display panels, participated in the Bay Point Oktoberfest, and held a meeting for the Hispanic community at La Finca restaurant which drew approximately 100 people. The process now for public outreach has improved, but we still need to do better. We welcome your comments and suggestions.</p>
When will the report for CCHS' third audit of GC be available?	The third audit is currently under review. It will likely be ready for review by the public in the fall of 2006 after the facility develops its action plan.
How is GC responding to "action items" identified in the third audit?	The third audit is still under review. GC still needs to work on some issues that were found before. We intend to work with CCHS on developing corrective actions. Some items GC thought it had resolved, were found by CCHS to only be partially complete. CCHS has final say whether an action item has been fixed.
Who will be doing the Safety Culture study at GC?	<p>The study is designed to get a sense of GC's safety culture by surveying all employees. GC cannot require people to complete the survey. They will be devoting one of their monthly meetings specifically to getting people to complete the survey. With a facility size of only 80 people, they should be able to get ample input. The same software was used at the GC plant in Richmond.</p> <p>The Safety Climate software was developed in England by an agency called the Health Safety Executive (similar to the EPA in the U.S.). Facilities in England voluntarily submit completed surveys to the HSE. At GC's Richmond plant, a third-party safety culture evaluation was performed and the results were provided to the facility and CCHS.</p>
Your audit presentation said GC has more than the average amount of action items to fix. How many more?	CCHS does not have a specific average number, but other audits have ranged between 40-70 action items. GC had 101.
Were they administrative items?	Yes and no. It is difficult to accurately answer this question. We did find some programs were not well developed, sometimes due to the need to address human factor requirements of the ISO.
If GC has so much to improve, why are they still allowed to operate? (w)	<p>The Contra Costa Health Officer can shut down a facility if there is an imminent danger to the community. When CCHS performed the audit at GC, no imminent danger to the community was found and no unsafe acts were evident.</p> <p>CCHS believes that by implementing the Industrial Safety Ordinance and the California Accidental Release Prevention</p>

	Program requirements, the potential for an accident is greatly diminished. The audit ensures that the facilities are implementing these requirements.
What were the general types of issues that were found?	Response by GC: CCHS found a variety of items. Some might be classified as administrative and some may be more related to mechanical problems. Is one more important than another? Difficult to say. Other facilities within the County have had serious accidents where people have died. GC believes that the root of the problem is a poor safety culture versus whether the problem was administrative or mechanical in nature. GC wants to make sure that its safety culture is sound.
Were improvements needed with the hydrogen fluoride (HF) process?	CCHS found that GC pays good attention to the HF process. Through employee interviews CCHS found that the most experienced operators were at the HF process. CCHS looked at safety programs in general and not specifically for any particular process. Some process safety information that needed improvement for certain chemicals was identified, and HF was one of the chemicals. CCHS' audit process looks at prevention programs and safety programs like training and operating procedures. CCHS is trying to verify that the facility has the required programs in place. CCHS really does not focus on any particular manufacturing process like HF. As for concerns around the HF process, nothing jumped out.
How will we know when the 2005 audit report is ready?	CCHS will let people know through contacting the MAC and sending letters to interested parties.
Will CCHS issue audit findings and a report on tonight's forum through the MAC?	Yes, CCHS can do that. CCHS wants to work with the MAC to get the information out.
Would CCHS convert the audit reports into more layman terms?	CCHS has tried to make summary sheets that provide a synopsis of the audits. Public feedback on these sheets would be greatly appreciated so they can be improved.

4) Response capacity in and around Bay Point

If GC has an explosion, will the smoke reach Bay Point?	Yes. Regulations require an evaluation of worst-case scenarios -- such as the largest chemical storage tank fails and releases all of its contents in 10 minutes -- to identify theoretically how far a chemical release could travel. Facilities also perform alternate release scenarios that evaluate what would happen if a smaller, but more realistic release were to occur. GC has performed these studies and has chemicals that could reach Bay Point and beyond.
Could a release from GC	Yes. The lower the wind speed, the wider the area affected

reach here (Calvary Chapel)?	by a release. With higher wind speeds the chemical gets diluted or better dispersed in the air. The worst-case situation would usually be during very low wind speeds when the chemical concentration stays high due to very little mixing with the air.
How do we protect ourselves in the event of a release?	We look at the worst-case scenarios and work with the facilities to do our best so that a release does not happen. If an event does happen, the best thing to do is shelter in place. The County has a Community Warning System that can be used to let the community and agencies know what is happening. The best thing we can do is to prevent the release from happening. That is why we perform detailed audits.
What types of problems or health impacts are associated with a chemical release?	The chemicals have a range of health effects depending on the type and concentration involved. For hydrogen fluoride, the material can result in eye and lung irritation, respiratory problems, and even death. Other chemicals have similar health concerns. One of the best things you can do is to shelter in place – shut your doors and windows, turn off heating or air conditioning. If you are indoors (the mall, your neighbor’s, etc.) stay there. If you are outdoors, get indoors. Don’t stay in your car. The county has a community warning system that is designed to get the word out as quickly as possible to stay inside. When the system is activated, we may not have very much information at the beginning, but we want to get people inside where they can get some protection. Being outside offers no protection.
Can the local hospital handle injuries associated with chemicals from GC?	Emergency responders get informed of the injuries including the types of chemical exposures that employees and people outside the plant may have received. Facilities provide Material Safety Data Sheets to emergency responders.
Why can’t we have direct communication in emergencies?	We do. Once the community warning system is activated, all parties get contacted. CCC takes over and decides what to do. We have a health officer and HazMat teams on call 24 hours a day. We can send response crews in to stop a release and/or to evacuate injured people. The community warning system we have in place in CCC is one of the most comprehensive in the nation.