



# CHLOREP<sup>®</sup> Emergency Response Contractor Verification Program Description

Updated: 03/08/18

## **Background**

The Chlorine Institute's (CI's or the Institute's) CHLOREP<sup>®</sup> Contractor Program was established to determine pre-verified emergency response contractors (also referred to as service providers in Canada) who have the ability to respond chlorine incidents in a specified capacity (Level 2 or Level 3). The program was initiated by industry to ensure that adequate response capabilities are not only in place, but pre-planned. Due to consolidations and plant closings in the chlor-alkali industry, CI recognized the need to ensure the availability of adequate chlorine response resources by alternative methods outside the traditional CHLOREP program (i.e. chlorine producer and packager response teams).

Participating companies in CI's CHLOREP Contractor Program are contractors who meet the expectations, qualifications, capabilities and equipment requirements described further below. Contractors are verified to Level 2 or Level 3 capabilities, whose basic differences are:

<b>Level 2</b>	Capability to provide response to a chlorine leak from a small container (i.e. cylinder or ton container) or minor release from a tank car.
<b>Level 3</b>	Level 2 capability plus special handling and field transfer capabilities for severely or potentially damaged bulk chlorine containers (i.e. cargo tanks and tank cars), which have the potential for high impact consequences to the public and/or environment that would require immediate/rapid response.

More detailed capability requirements are provided further below. Level 2 contractors can become Level 3 contractors upon a new verification application and demonstration of added capabilities. Level 3 contractors may also request to be verified as a Level 2 contractor, upon a new verification application, if certain personnel or capabilities change.

## **Verification Process**

Continued preparedness of CHLOREP contractors are verified through facility visits at a defined frequency against the requirements and expectations outline in this program description. CI member groups are used to review verification documentation and determine approval. Any issues raised will



be directed to CI's Emergency Preparedness Issue Team (EPIT), as needed. A roster of participating verified contractor companies is maintained and distributed for the use of the Institute membership. Verification packages can be provided to members upon request. Due to existing programs, U.S. and Canadian-based contractor visits are conducted slightly different. General descriptions are provided below. See CI's CHLOREP Contractor Verification Procedure for more details on the actual verification process.

*U.S.-Based Contractors:* U.S. contractor companies participating in the program are visited by a CHLOREP verification team every two years for Level 2 contractors and every three years for Level 3 contractors. The verification team is typically comprised of one CI member chlorine producer, one CI member packager and one Class I railroad representative who are accompanied by a CI staff representative. The date of the visit is coordinated between the contractor and verification team based on availability. After the visit, the verification team will review the final package to determine approval.

For the years in between the verification site visits, the contractors will complete and submit either the full verification report (for Level 3 contractors) or annual report (for Level 2 contractors) to CI staff, as appropriate. CI staff will do an initial review of the paperwork to identify any significant changes. It will be determined on a case-by-case basis if there are enough significant changes that warrant review by the EPIT (excluding contractor members), and the EPIT will determine if a verification visit should be conducted before it is due.

For Level 3 contractors having satellite locations with Level 2 and/or Level 3 capabilities, the primary Level 3 site will be verified. The verified Level 3 site will self-verify its Level 2 and/or Level 3 satellite locations and verify in writing to CI that those sites meet the Level 2 and/or Level 3 requirements as defined in this document.

*Canadian-Based Contractors:* For contractor companies based in Canada, a Transportation Emergency Assistance Program (TEAP III) verification through the Chemistry Industry Association of Canada (CIAC) is also required. CI has coordinated with CIAC to leverage their established TEAP III program to perform the CHLOREP contractor verification. TEAP III Standard Assessments are conducted every two years, with annual updates provided in the alternate years. For Canadian contractor companies with multiple locations, each location will be verified according to its TEAP III schedule.

When a contractor is a new applicant or due for verification under the CHLOREP Contractor Program, they must complete CI's Canadian TEAP III CHLOREP Addendum in conjunction with the required CIAC



TEAP III documentation. A CI member representative (who has current TEAP III assessor certification) will accompany the TEAP III assessment team on the facility visit. Once the final TEAP III Standard Assessment documentation is made available, a CI member group will review along with CI's addendum to determine approval.

CI staff will review the annual updates in the alternate years to identify any significant changes. It will be determined on a case-by-case basis if there are enough significant changes that warrant review by the EPIT (excluding contractor members), and the EPIT will determine if a verification visit should be conducted before it is due.

### **General Requirements/Qualifications**

General requirements and qualifications to be a CHLOREP verified contractor include:

- Be a member of The Chlorine Institute, including being current on membership dues.
- New applicants must be sponsored by a CI member company or Class I railroad.
- Successfully complete initially on-site verification, including meeting with contractor company management.
- Canadian Contractors - Be a verified member of the CIAC TEAP III Service Provider Program.
- Provide annual updates on verification program relevant information, as explained above.
- Full-time contractor personnel who are experienced and trained periodically. Immediate notification must be provided to CI staff when experienced and trained personnel (as identified in the verification report) leave employment by the contractor. EPIT will consider on a case-by-case basis if a verification visit should be conducted before it is due.
- Conduct employee background checks and maintain a written security program.
- Sub-contractors may be used, as needed, but sub-contracted employees must meet the same training criteria and capability requirements as verified contractor personnel if they are being used for chlor-alkali specific functions as described in this document.

- Maintain written emergency response procedures (including chlorine transfer procedures for Level 3 contractors).
- Maintain written maintenance procedures for emergency response equipment.
- Level 3 Contractors – Provide evidence of experience, equipment and capabilities (including written procedures) for responding to anhydrous hydrogen chloride (AHCl) and vinyl chloride monomer (VCM) incidents (*verified through documentation only, not on the visit, and provided to shippers upon request*).

**Employee Training Criteria**

<p><b>Level 2</b></p>	<p><u>General:</u> All hazmat responders must be trained to Technician Level in accordance with U.S. OSHA requirements in 29 CFR 1910.120(e) (or Canadian equivalent). This includes an initial 40 hours of training with an annual 8-hour refresher training on general safety elements.</p> <p><u>CI Mission Chemical Specific:</u> Identified CHLOREP Level 2 responders must also receive additional training focused on CI mission chemicals that covers chemical properties, health effects, emergency response considerations, use of emergency response kits, and other items noted in the Capability Requirements section below. All responders (as identified by the contractor) are encouraged to go through CI’s annual CHLOREP 40-hour training, when possible. All responders must receive refresher training on CI-mission chemicals at least every two years, which can be conducted as determined by the contractor. The contractors are responsible for ensuring their responders meet the requirements identified in this document and reporting those trained personnel in the verification report.</p> <p>If training is provided through non-CI sponsored events, the training event/venue should be identified in the verification report and annual updates. The non-CI sponsored events will be reviewed for equivalency and approved with the verification. Other CI facilitated training can be requested, if needed, and considered on a case-by-case basis.</p>
<p><b>Level 3</b></p>	<p>All Level 2 training requirements. In addition, lead responders must have:</p> <ul style="list-style-type: none"> <li>➤ Training and experience in performing field transfers of chlorine and changing valves on properly prepared chlorine residue tank cars and cargo tanks in the field; and</li> <li>➤ Training on performing field transfers of AHCl and VCM.</li> </ul>

### Capability Requirements

<b>Level 2</b>	<ul style="list-style-type: none"> <li>➤ Apply CI Emergency Response A-, B- and C-Kits</li> <li>➤ Use of chlorine cylinder recovery vessel (a.k.a salvage cylinder)</li> <li>➤ Field transfer of caustic (NaOH or KOH), sodium hypochlorite (bleach) and hydrochloric acid</li> <li>➤ Patching and plugging for all CI mission chemicals</li> <li>➤ Contain spills on soil and in water</li> <li>➤ Environmentally responsible cleanup of all mission chemicals</li> <li>➤ Mitigate tank truck rollover for all mission chemicals</li> </ul>
<b>Level 3</b>	<p>All Level 2 requirements and:</p> <ul style="list-style-type: none"> <li>➤ Field transfer of chlorine from all containers</li> <li>➤ Change valves on properly prepared chlorine residue tank cars and cargo tanks at any location</li> <li>➤ Field transfer of AHCl and VCM</li> </ul>

### Equipment Requirements

<b>Level 2</b>	<ul style="list-style-type: none"> <li>➤ CI Emergency Response A-, B- and C-Kits</li> <li>➤ Chlorine cylinder recovery vessel (a.k.a salvage cylinder)</li> <li>➤ Chemical-compatible hoses for caustic (NaOH or KOH), sodium hypochlorite (bleach) and hydrochloric acid</li> <li>➤ Chemical-compatible pumps for caustic (NaOH or KOH), sodium hypochlorite (bleach) and hydrochloric acid</li> <li>➤ Container patch kit</li> <li>➤ Containment equipment</li> <li>➤ SCBAs</li> <li>➤ Level A, B and C suits compatible with CI mission chemicals</li> <li>➤ Air monitoring equipment</li> <li>➤ General PPE (gloves, goggles, etc.)</li> <li>➤ Emergency response vehicles/trailers</li> </ul>
<b>Level 3</b>	<p>All Level 2 requirements and:</p> <ul style="list-style-type: none"> <li>➤ Compatible hoses for chlorine field transfer</li> <li>➤ Ability to operate liquid chlorine pump for chlorine field transfer<sup>1</sup></li> <li>➤ Compatible hoses and valves (2" valves, stub-outs, etc.) for AHCl and VCM field transfer<sup>2</sup></li> <li>➤ Compatible pumps for AHCl and VCM field transfer<sup>2</sup></li> </ul>

	<ul style="list-style-type: none"> <li>➤ Eductors and associated equipment</li> </ul> <p><sup>1</sup>CI's liquid chlorine pump stored and maintained by United Professional Services – Fort Worth, TX.</p> <p><sup>2</sup>Equipment recommended but not required. If not on hand, availability should be identified.</p>
--	--

Contractors' equipment inventory is provided in their CHLOREP verification reports.

**Additional Expectations**

CI's overall goal is to collaboratively advance industry's knowledge and techniques with respect to emergency response. To help achieve this goal, CHLOREP verified contractors are expected to participate in CHLOREP training, TRANSCAER training and/or other CI meetings/events as much as possible to facilitate dialogue for continued preparedness and improvements in CI mission chemical emergency response. In doing so, verified contractors receive a special, reduced CI membership rate provided they assist in the following (in addition to meeting the requirements outlined above):

<b>Level 2</b>	<p>For team members who have already gone through required training outlined above:</p> <ul style="list-style-type: none"> <li>➤ Provide instructor at annual CHLOREP training (encouraged when possible)</li> <li>➤ Provides instructor(s) at CI-sponsored TRANSCAER training events located in reasonable proximity to contractor's location or equivalent training event (per approved verification report) (required)</li> </ul>
<b>Level 3</b>	<ul style="list-style-type: none"> <li>➤ Provide instructor(s) to at least one CI-sponsored training event per year (annual CHLOREP training and/or TRANSCAER event) or equivalent training event (per approved verification report) (required)</li> <li>➤ Provide equipment for at least one CI-sponsored training event per year (strongly suggested when possible)</li> </ul>

Activity of the CHLOREP verified contractors is monitored by CI's Vice President of Transportation and Emergency Preparedness. If a verified contractor does not participate in the required amount of training events or shows a lack of participation in CI-sponsored events, that contractor will be charged the non-discounted CI associate membership dues rate.

If the contractor has not met the expectations outlined in this document, CI will issue a written warning after the issue has been reviewed by the EPIT. Any member of the EPIT that is a current verified contractor will not participate in the discussion or decision to issue a warning. Within three months from the issuance of the warning, the contractor must submit a corrective action report with a specific timeline to resolve the identified issues. If a corrective action report is not submitted on time



or corrective actions are not completed in the specified time in the provided report, automatic suspension from the CHLOREP contractor program will occur.

### **Leaving the Program**

Verified contractors may leave the program voluntarily at any time upon their request. In the event there is continued failure to meet program requirements or pay CI membership dues, the contractor will be removed from the program. Upon leaving the program, the contractor will no longer be considered a verified CHLOREP contractor and CI members and Class I railroads will be notified.

### **New Applicants**

When an emergency response contractor contacts CI staff with interest in being added to the list of CHLOREP verified contractors, is not a CI member and has never been part of the program before, they must first go through the CI membership approval process. CI staff will provide a response explaining the process and copy CI's Manager of Member Services so he/she may follow-up with the membership application package. Once the contractor submits the membership application, it will be considered by the CI Board of Directors for approval through an email ballot with a specified response deadline (overall process typically takes 4-6 weeks). If approved, the approval will be temporary pending a successful CHLOREP verification.

For U.S. contractors, the CHLOREP verification visit will be coordinated soon after and follow the process described in the CHLOREP Contractor Verification U.S. Procedure. For Canadian Contractors, they must already be TEAP III certified and the verification will be conducted as appropriate based on the TEAP III schedule (see CHLOREP Contractor Verification Canadian Procedure) soon after initial CI Board approval.

If the contractor is approved for verification, final CI membership approval will also be granted. CI staff will notify the Manager of Member Services so he/she may send the final membership package to the contractor and request membership dues payment. CI staff will also follow the process to send the contractor the approved CHLOREP verification package.