



Environmental Emergency Plan

Sterling Chemical Malta Ltd

Branch:

Industrial Estate


Hal Far HF 51

Malta

Rev. and Date:

rev. 00 of 02/2014



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1. PURPOSE

The purpose of this document is to eliminate, reduce and/or mitigate environmental impacts in the event of hazardous substance releases at Sterling Chemical Malta Ltd facility plant site in HAL FAR, Birzebbugia.

2. SCOPE

To ensure preparedness to react in the event of accidental spills of hazardous materials in accordance with pollution prevention rules and obligations.

To establish formal response procedures that will minimize damage which may occur as a results of accidental spills of hazardous substances.

For each institution, to develop, adapt and integrate an Environmental Emergency Plan and MP_4.4.7 Emergency training and reaction of EMS to respond to accidental spills of hazardous materials, to provide specific training, and to hold drills, so as to ensure preventive and responsible environmental protection management.

To prepare staff and inmates for quick and effective responses to equipment failure, accidents, sabotage, or other incidents that could cause environmental damage (impacts), more specifically:


- adjacent soil contamination and devaluation of the land;
- contamination of nearby watercourses;
- release of atmospheric pollutants (particularly when fire occurs subsequent to spills);
- contamination of the aquifer (underground water) and consequently of drinking water when there are artesian wells on the affected site;
- introduction of toxic substances to the food chain via contamination of ecosystems and/or vegetable and animal species;
- destruction of natural habitat, animals and/or material assets; and
- losses, injuries or assaults on the quality of human life.

3. RESPONSIBILITY

The HSE committe must formally assign responsibility for developing and maintaining a state of preparedness for staff and inmates to implement an Environmental Emergency Plan (EEP) for the institution .

The persons assigned to the institution's EEP must put in place mechanisms and procedures that will allow for preventive and responsible management of emergency responses to environmental incidents (e.g. accidental spills of hazardous materials) in conformity with local safety regulations.

- a) In order to be able to contend with potential spills of hazardous materials, the CPM will plan for response measures. In general, preparation for an EEP comprises three main stages: response plan;

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- b) related training; and
- c) drills (simulations).

In order to demonstrate and foster an ongoing commitment to the emergency plan, the RSGA should develop and maintain support policies and procedures. This should involve:

- raising and maintaining an awareness of the emergency plan
- maintaining ongoing training and education
- ensuring that the plan is updated as required
- ensuring that the appropriate information is communicated to all stakeholders, including the community and the local emergency services.

Continued communication with the local community is also required to ensure that a high level of awareness is maintained. For example, a facility should ensure that, if there is an emergency action card, the latest version is available and is also provided to new residents in the community.

4. RESPONSE IN CASE OF CHEMICAL SPILLS

4.1 Preventing spills

Listed below are some basic spill prevention steps that apply to storage, transportation, and transfer of chemicals.

General Precautions


- Reduce clutter and unnecessary materials in your work areas.
- Eliminate tripping hazards and other obstructions.
- Have all needed equipment readily available before starting work.

Storage Precautions

- Use sturdy shelves.
- Larger containers should be stored closer to the floor.
- Containers on shelves should be stored back from the edge to reduce the danger of falling.
- Storage shelves should have lips to further reduce the danger of falling.
- Chemicals should be stored by compatibility class first, then alphabetically.
- Inspect the storage area regularly for leaking or defective containers.
- Use appropriate storage containers.
- Periodically check containers under laboratory chemical hoods, sinks and lab benches for signs of deterioration.

Transportation Precautions:

- Use carts, where appropriate.

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- Use safety containers, where appropriate.
- Use bottle carriers for any glass bottle greater than 250 ml.
- Use straps to secure gas cylinders, where appropriate.
- Think about potential hazards before transporting chemicals.
- Consider purchasing plastic coated "shatter resistant" bottles.

Precautions in Transferring Chemicals


- Pay careful attention to the size of container to avoid overfilling.
- Use pumps or other mechanical devices rather than simple pouring.
- Provide containment to capture leaks and spills.

Housekeeping

- All hazardous substances must be stored inside buildings or under cover;
- Store hazardous substances not used daily in cabinets, or in designated areas;
- All chemicals that are transferred from larger to smaller containers must be transferred by use of a funnel or spigot.
- All hazardous substance containers should be closed while not in use;
- Use drip pans or other collection devices to contain drips or leaks from dispensing containers or equipment;
- Implement preventative maintenance activities to reduce the potential for release from equipment;
- Immediately clean up and properly manage all small spills or leaks;
- Periodically inspect equipment and hazardous substance storage areas to ensure leaks or spills are not occurring;
- Use signage to identify hazardous substance storage or waste collection areas;
- Keep all work areas and hazardous substance storage areas clean and in good general condition.

Container Management

- All hazardous substance containers must be in good condition and compatible with the materials stored within.
- All hazardous substance containers must be accessible and spacing between containers must provide sufficient access to perform periodic inspections and respond to releases.
- Empty hazardous substance containers (drums) must have all markers and labels removed and the container marked with the word 'empty'.
- Any spills on the exterior of the container must be cleaned immediately.
- Flammable materials stored or dispensed from drums or totes must be grounded to prevent static spark.
- Do not overfill waste drums. 4" of headspace must remain to allow for expansion

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Secondary containment

- Store all bulk chemicals (>10 gallons) within appropriate secondary containment, or any sized chemical if there is a potential for release to the environment. (also in laboratories)
- Secondary containment should be checked periodically, and any spills identified in secondary containment must be immediately cleaned up and removed.

4.2 Preparing for Spills

Evaluating potential hazards and establishing protocols and in advance is a required component of Hazard Awareness Manual. Annex 3.

Marking/labeling

- Ensure all hazardous substances, including chemical wastes, are properly marked and labeled in accordance with all federal, state and local regulations.
- Ensure that hazardous substances transferred to small containers are marked with the chemicals name (example- “Isopropyl Alcohol”) and hazard (example- “Flammable”).


Hazardous Substance Inventory:

An inventory must be maintained for all hazardous substance stored in quantity (<55 gallons), and/or list of locations where non-bulk hazardous substances are stored (flammable lockers- shop floor). Annex 1.

Evaluating Hazards

When spills occur, a quick appropriate response can prevent serious consequences. However, the wrong response can make things worse. In order to respond promptly and appropriately, you should evaluate the potential hazards in advance of using the chemicals. The first source of information to consult would be your Material Safety Data Sheets (MSDSs). [If you need an MSDS, consult DRS **Chemical Safety Section website**] Of most concern in spill situations are chemicals which are:

- air reactive
- water reactive
- flammable
- polymerizable
- corrosive
- highly toxic

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Based on these hazards, you can then determine:

- appropriate personal protective equipment for spill response (e. g. gloves, respirators, etc.)
- types of fire suppression equipment
- appropriate clean up materials
- first aid procedures

Establishing Spill Response Protocols


Before working with chemicals you should determine what could go wrong and how you might respond to a spill. As a result of this evaluation, you are prepared written protocols for use in the event of a spill. These protocols need to be communicated to all persons who might be affected by a spill. In addition, you should have basic spill clean-up materials readily available should anything go wrong. More information on spill clean-up materials is listed below. Always create written spill protocols before using a chemical.

Spill Response equipment

Spill response equipment must be maintained and located in areas where spills are likely to occur. Spill kits should provide adequate response capabilities to manage any anticipated spill or release. The following general requirements are to be followed:

Prior to starting any work with chemicals, make sure that you have all the necessary personal protective devices, safety equipment, and containment/clean up materials readily available. Each individual who may be involved in spill response or clean up must know the purpose and limitations of all personal protective equipment, safety equipment and clean up materials. Prepackaged spill kits are available from various vendors. The prepackaged kits tend to be expensive, so campus units typically make their own kits. To make your own kit, include the following items at a minimum:

- Disposable nitrile gloves (1 box)
- Neoprene gloves (1 set)
- Safety goggles
- Hand broom
- Plastic dustpan
- 4-mil plastic zippered bags
- Appropriate absorbent material (such as spill pads, spill pillows or loose sorbents)

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The location of spill control kits should be clearly marked and highly visible. Make sure all personnel know the kit's location, are familiar with the kit's contents, and understand its limitations. In annex 2 show the plan of spill kit placement.

Emergency response equipment should be inspected periodically to ensure that the spill kit is complete.

4.3 Spill response procedures

Spilled solvent and solvent-contaminated water should never be allowed to drain off into sewers, any body of water or onto the ground. It is important to inspect and maintain sterling's process equipment, holding tanks and spill control devices continually, and know what to do ahead of time if a spill or leak occurs.

Be prepared by having proper protective equipment identified and available for personnel cleaning up any spills.

If you or a fellow employee experience symptoms of dizziness, "drunkenness" or eye irritation, or if breathing becomes difficult, leave the area immediately and seek fresh air. Call a physician and/or take the employee to an emergency medical facility. If a colleague stops breathing, perform mouth-to-mouth resuscitation and seek medical assistance immediately.


4.3.1 Definition of Complicated Spills

If your spill meets **ANY** of the following conditions, it is a COMPLICATED SPILL ? immediately call 118.

- A person is injured; or
- The identity of the chemical is unknown; or
- Multiple chemicals are involved; or
- The chemical is highly toxic, flammable or reactive; or
- The spill/leak occurs in a "public space" such as corridors; or
- The spill/leak has the potential to spread to other parts of the building such as through the ventilation system; or
- The clean up procedures are not known or appropriate materials are not readily available; or
- The clean up requires a respirator (including cartridge respirators) to be worn and no personnel have been trained and fit-tested in accordance to the campus Respiratory Protection Program; or
- The spill/leak may endanger the environment by reaching waterways or outside ground, or by going down a drain.

4.3.2 Complicated Spill Procedures

1. Evacuate the area, alerting others in the area to follow.

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2. If possible, close doors and windows to prevent the spread of fumes and vapors. From a safe location, call immediately. Be ready to answer the following questions:
 - What is the name of the chemical spilled?
 - What quantity of the chemical is spilled?
 - Where is the spill (building name and room number)?
 - Is anyone injured or splashed with the chemical?
 - Is a fire or explosion involved in the spill?
 - What is your name and phone number?
3. Secure the area so no one will enter until the emergency responders arrive.
4. Send someone with knowledge of the chemical spilled to meet the fire department at your building's main entrance. If a Material Safety Data Sheet (MSDS) is readily available, the contact should take a copy to provide to the responders.


4.3.3 Simple spill procedures

If the spill does not meet any of the conditions for a complicated spill, the spill is defined as simple. You may clean up simple spills as described below.

1. If possible, close doors and windows to prevent the spread of fumes and vapors.
2. Turn off all potential sources of ignition (Bunsen burners, pumps, mechanical equipment not designed to be spark-proof, etc) if the spilled material is flammable (it may be necessary to turn off power from a remote circuit breaker).
3. Put on gloves, lab coat, apron, eye protection, and other PPE, as necessary.
4. Absorb liquids using appropriate absorbent material (such as spill pads, spill pillows or loose sorbents) °Do not attempt to neutralize acids or bases - absorb each liquid spill as is.
 - Do not use silica products to clean up hydrofluoric acid.
 - Do not use combustible materials to clean up oxidizers. For instance, do not use paper towels for nitric acid spills.
5. Carefully sweep powder spills to avoid contaminating the air with chemical dust.
6. Collect and contain clean-up materials in a plastic container or thick plastic bag and affix descriptive labels
7. Decontaminate the affected area and equipment (soap and water can be used to clean most surfaces) and ventilate the area, if necessary.

4.4 Handling and storage of Chemicals

Hazards associated with various chemicals and gases vary widely. Understanding the hazards associated with a compound and minimizing the quantity used and stored in the lab will decrease chance of injury.

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Compressed gasses: Use appropriate hand carts to move compressed gas cylinders. Gas cylinders should be capped and secured to a cart during transport. Highly toxic gases should not be moved through the corridors, particularly during business hours. Always consider cylinders as full and handle them with corresponding care.

Gas cylinders should be stored in well-ventilated areas with their protective caps on. Gas cylinders should be secured (e.g., strapped or chained in place) to reduce the chance of being knocked over. Do not store cylinders near heat or high traffic areas. Do not store flammables and oxidizers together. Do not store empty and full cylinders together. Storage of large quantities of cylinders should be in an approved gas cylinder storage area. Refer to the Compressed Gas Safety Fact Sheet.


Containers: Make sure all containers are of good integrity. If deteriorated containers are found, dispose of the chemical or transfer it to a new container. Make sure that the container is appropriate for the chemical stored; for example, hydrofluoric acid must not be stored in glass and some oxidizers should not be stored in plastic containers. Waste halogenated solvents may not be stored in metal safety cans due to the potential for corrosion. Flammable materials, if removed from their original containers, should be stored in appropriate containers, such as safety cans or other HSE committee approved containers. If in a substantial amount (>4 liters, but less than 20), waste solvents should be stored in Inflammable external warehouse .

Cryogenic liquids: These items present the potential hazards of fire or explosion, pressure buildup, embrittlement of structural materials, frostbite, and asphyxiation. Work areas must be well ventilated. Cryogenic liquids must be stored, shipped, and handled in containers that are designed specifically for this purpose. Because of the extreme cold and splash hazards, skin protection and eye protection - preferably a face shield - should be worn when handling cryogenic liquids. First time users of cryogenic liquids should have direct supervision and instruction from an experienced user when attempting transfers from one container to another.

Handling: Encourage the use of poly coated bottles or use bottle carriers for transporting chemicals which are in glass containers. Close caps securely. Pour chemicals carefully. Never add water to concentrated acid; rather prepare dilute solutions by adding acid to water. Containers holding more than five gallons should be grounded when transferring flammable liquids.

Labels: Make sure all labels are legible. Label all containers with the chemical name and appropriate health hazard warning(s). A chemical is considered to pose a health hazard if it is in one or more of the following classes: carcinogen, corrosive, irritant, sensitizer, toxic, or highly toxic. Information on whether a chemical poses a health hazard may be found on the Material Safety Data Sheet.

Date all peroxidizable and other chemicals which may become unstable over time; test and/or dispose of them when appropriate. Common examples of chemicals that form peroxides upon

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aging are: ethyl ether, isopropyl ether, tetrahydrofuran, and dioxane. See DRS Chemical Safety Factsheets for a more complete listing of chemicals that can form peroxides upon aging.

Storage: Avoid storing chemical containers in hard to reach areas. Chemicals should be segregated by hazard classification. Once segregated by hazard class, chemicals may be stored alphabetically. Basic segregations should keep:

- oxidizers away from organics
- air/water reactives away from air and water
- caustics away from acids
- cyanides, sulfides away from acids

Laboratories with large numbers of hazard classifications may choose to further segregate chemicals.

Volatile chemicals should be stored in volatile storage cabinets, or temporarily in fume hoods when cabinets are unavailable. If volatile substances are stored in a hood, other uses of the hood should be restricted to activities compatible with the chemical and physical properties of the stored or used chemicals. When volatiles must be stored in a cooled atmosphere, flammable material refrigerators, explosion-proof refrigerators or cold rooms designed for this purpose must be used. Refer to the Flammable Liquid Storage Cabinets fact sheet.

4.5 Evacuation procedure


In the event of a hazardous substance release that has the potential for fire, explosion or other human health hazards the following procedures will be implemented:

- Facility staff will be notified of evacuation by one or more of the following method(s): [Verbal, Intercom, Portable Radio, Alarm, Other].
- Notification to emergency services will be performed- Call 118.
- Facility staff will follow predetermined evacuation routes and assemble at designated areas. Evacuation maps must be displayed throughout the facility.
- Individuals responsible for coordinating evacuations must confirm if the business has been completely evacuated.
- Facility staff will be made familiar with evacuation procedures during new employee orientation, and annual trainings thereafter.
- Designated emergency response contacts will coordinate all activities with outside emergency personnel

4.6 End emergency

Spill Cleanup and Disposal

In the event of a hazardous substance release spill cleanup materials are to be properly characterized to determine if it designates as a Dangerous Waste. The designated onsite

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emergency contact, with the assistance of [waste disposal vendor] and other resources will determine the wastes status prior to disposal.

Reporting a Release:

If a hazardous substance spill has been released to soil, surface water, drains or air the following notifications (within 24-hours) are to be performed (may vary from state to state):

- **Fire Department** (any release that poses an immediate threat to human health, property or the environment)
- **MEPA;**
- **Medicine Authority;**
- **Water Corporation**

When reporting a release, prepare to provide the following information (use spill report form):

- Your name and telephone number from where you are calling;
- Exact address of the release or threatened release;
- Date, time, cause and type of incident (fire, air release, spill, etc.)
- Material and quantity of the release, to the extent known;
- Current condition of the facility;
- Extent of injuries, if any; and
- Possible hazards to the public health and/or environment outside of the facility.


4.7 Training and education

To remain a living document, the emergency plan must be properly supported and managed. It should be incorporated into the EMS to ensure its continued effectiveness. The safety management system should include measures to promote awareness and understanding of the plan (such as training and education), control measures (such as record keeping), and evaluation measures (such as regular monitoring and review).

All persons on-site, including visitors and contractors, should be provided with induction, education and ongoing training to ensure they have a general awareness of the emergency plan and the capability to undertake their roles and responsibilities in the event of an emergency.

The procedure MP_4.4.7 and the Safety instruction MIOS_4.4.3-B specify information that must be provided to visitors and the facility. Training programs should be based on trainees' identified needs and should be modified on the basis of their evaluations of the training provided. Areas to be covered should include:

- general duties, roles and responsibilities under the plan
- emergency functions of the organisational structure
- emergency procedures
- emergency resources.

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Training and education should be competency-based, enabling personnel to develop skills in the use of emergency equipment and a working knowledge of emergency procedures. The training program should provide access to information for designated personnel on the potential impacts of the range of emergencies identified i.e. several key personnel at the facility should have developed an understanding of what could happen if things do go wrong.

All persons within the local community surrounding area must be provided with information on the appropriate actions to be taken during an emergency and the means by which they will be warned of, and kept informed during, an emergency.

4.7.1 Staff Training

Training of staff is an important part of this plan to ensure the proper containment and disposal of any leaked/spilled liquid. Training to staff on these spill procedures will happen as follows:

- All new employees will receive a copy of the spill procedures
- Within 3 months of being hired, all new employees will receive a spill procedure orientation seminar. This will include, but not be limited to, a review of the spill procedure document, explanation and location of relevant Personal Protective Equipment (PPE) and shown the spill kit locations, contents and use.
- All existing employees will be re-oriented, every 6 months, on the spill procedures as mentioned above or will be part of a Spill Control Drill.

4.8 Operational control

Controls should be established and maintained to ensure that the policy, objectives and targets of the emergency plan can be met. This should include ensuring that all equipment and resources are available, fully maintained and in a state of operational readiness at all times. Checks will include ensuring that:


- emergency resources are not located in the hazard zone and are accessible
- perishables (e.g. batteries) are serviceable and spares are available
- materials that have been consumed have been replaced (e.g. foam, neutralising agents)
- new staff are issued with emergency protective equipment.

4.9 Record keeping

Records, which are an integral part of the facility's safety management system, should be retained to verify the adequacy of the system.

Circumstances for which records should be kept include:

- all induction programs and ongoing training, including details of personnel trained
- desktop simulations and practical exercises at the facility
- all near misses and incidents at a facility
- testing of the plan, including the dates of testing, methods, personnel responsible and the results of testing

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- the results of monitoring
- the results of audits
- management reviews.

5 RESPONSE IN CASE OF GAS LEAKAGE

5.1 Response action procedure

1. Open all doors and windows
2. Upon suspicion of gas leak, notify Principal/Site Manager and custodian.
3. Evaluate problem, if possible. Determine if maintenance staff can control leak.
4. Evacuate part or all of the premises as necessary.
5. Check that all gas appliances are switched off
6. Shut off the gas supply
7. Upon confirmation of a gas leak, evacuate building and notify Civil Protection Department 2393 0000 or 911 and gas utility company. Establish Command Center at a safe location away from the building.
8. Complete Critical Incident Report Form.
9. Notify the Communications Department.
10. In consultation with Fire Department or utility company personnel, Safety and Health Office and Maintenance personnel determine whether to implement Work day Cancellation or resume normal building operation.
11. If injury or damage has occurred, refer to Medical Emergency, Multiple Casualty Incident or Building-Structural Failure procedures.

5.2 Responding to a natural gas leak

It's important to keep in mind that natural gas is flammable and that something as simple as a spark can serve as an ignition source. Use your sense of sight, hearing and smell and any of the following signs to alert you to the presence of a gas leak:


Look

- Dirt or water being blown in the air.
- Dead or dying vegetation (in an otherwise moist area) over or near pipeline areas.
- A fire or explosion near a pipeline.
- Exposed pipeline after an earthquake, fire, flood or other disaster.

Listen

An unusual sound, such as a hissing, whistling or roaring sound near a pipeline.

Handling emergencies

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Leaking gas from any damaged pipeline or gas meter could cause a fire, explosion, property damage and serious bodily injury.

Follow these guidelines if you encounter a leaking gas pipe or meter:

- **IMMEDIATELY and SAFELY EVACUATE** the area and from a safe location,
- **CALL 911 or 2393 0000** or promptly after leaving the area if the damage results in a natural gas leak that may endanger life or cause bodily harm or damage to property.
- **DO NOT** light a match, candle, or cigarette.
- **DO NOT** turn electrical devices on or off, including light switches.
- **DO NOT** start an engine or use any device, including a telephone, which could cause a spark.
- **DO NOT** attempt to control the leak or repair the damaged pipe or meter. Do not use or turn off any equipment that could cause a spark. Motorized or electrically powered equipment or vehicles may create an ignition source if a gas leak is present. Safely abandon any motorized or powered equipment or vehicles. Gas leaking from a plastic pipe can create static electricity that can ignite the gas.

WARNING

About the Distinctive Odor of Natural Gas

Do not rely on your sense of smell alone.


- Although we add a distinctive odor to natural gas to aid in the detection of leaks, you should not rely on your sense of smell alone to determine if you have a gas leak.
- Diminished sense of smell. Some persons may not be able to smell the odor because they have a diminished sense of smell.
- Odor masking. Sometimes the odor is masked by other odors in the area.
- Fading or loss of odorant. Certain conditions, such as odor fade (loss of odorant) may cause the odor to diminish so that it is not detectible.

About Odor Fade (loss of odorant)

Odor fade or loss of odor can cause the odorant we put in the gas to diminish so that you can't smell it. Do not rely on your sense of smell only to detect the presence of natural gas.

Causes of Odor Fade

- Odor fade is caused by physical and chemical processes. Other factors that may cause odor fade include:
 - ✓ Construction and configuration of the customer's gas facilities.
 - ✓ Presence of rust, moisture, liquids or other substances in the pipe.
 - ✓ Gas composition, pressure and flow.
 - ✓ Intermittent, little or no gas flow over an extended period that normally lasts until gas flow increases or becomes more frequent.

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- New pipe installations.
- Steel and larger pipes.
- Soil.

6 TRAINING AND DRILL

- ✓ training on evacuation procedure is provided at the entrance of the worker;
- ✓ training will be updated annually
- ✓ Every six months there will be a simulation to assess the learning of the worker

7 APPENDIX

Appendix 1: Hazardous Substance Inventory

Appendix 2: Plan of spill kit placement

Appendix 3: Hazard Awareness Manual