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IND

Accident/Incident Investigation and Reporting

Document Revision Change Table

Revision Number	Revision Description	Revised By	Revision Date
Rev. 02	<i>Considered as starting document for revision change table</i>		
Rev. 03	Procedure update reporting to Corporate guidelines, New A/B reporting and investigation guidelines. Revisions in red font.	S.Simoneaux	07/01/12
Rev. 04	Updated to reflect OSHA change to Reporting Fatalities and Severe Injuries	G. Dawson	12/1/2014
Rev. 05	Update for Health and Safety Advisory 227.	G. Dawson	1/25/2016
Rev. 06	Update and Review to comply with N-ID-OSA-010 (See MOC 0976-EHS-19-0031)	J. Gonzales	2/5/2019
Rev. 07	Update and Review to comply with N-ID-OSA-010, Process Safety Alert 030 Update of additional definitions Merger of BMEHS-001.002 Spill and Release Incident Reporting into Sections 3,4,5 Attachment 4, and Addendums 4 and 5	J. Gonzales	9/21/2020
Rev. 08	Incorporate Immediate Notification Clarifications, AP Reporting Guidelines, 24-hour determination of release amounts, define plant upset AIM expectations, include summary of requirements	C. Wilding	10/10/2021
Rev. 09	Added the requirement to include the VP of EHS Services USA in distribution for one-pagers. Considered a minor change. No MOC.	C. Wilding	3/23/2022

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1 Purpose

The purpose of this document is to define the minimum requirements for consistent and timely notification and reporting of accidents and incidents. Make external reporting of accidents/incidents to outside agencies in accordance with approved local procedures and regulatory requirements throughout the BASF Beaumont Site.

Security Incidents and Incidents that result solely in Product Quality Issues should be reported to supervision but will not follow the incident reporting and investigation requirements outlines by this document.

2 Summary of Requirements

This section is intended to summarize and clarify requirements in this document. It is not intended as a substitute for the information in the body of the document.

- After an incident occurs, injuries shall be tended to and immediate steps shall be taken to minimize EHS&S consequences.
- All incidents must be reported to supervision immediately and entered into the AIM database by the end of the shift.
 - Where circumstances prevent entering the incident into the AIM database, this may be delayed until no later than the end of the next shift.
- Shift supervisors are responsible for filling out the preliminary accident / incident report in Lotus, including release information and all GID required fields within 24 hours of the incident.
 - In non-operations areas, the person reporting the incident is responsible for filling out the incident report and ensuring that the preliminary information is complete.
- For releases, a shift supervisor is required to make an initial assessment for the release amount.
 - Where a supervisor is unable to make a determination on release amount, an appropriate unit engineer shall be consulted.
 - If the release is significant and the exact amount cannot be determined, the unit MUST notify EHS to begin making agency notifications.
- Certain incidents require immediate notification of the next level of management. These can be found in Addendum 6.
- Certain incidents require additional internal and external reporting. These incidents and their requirements are outlined Addendum 2: Incident Notification Reporting Requirements Chart.
- Contractors are required to report incidents to their supervision and to BASF supervision immediately. Incidents involving contractors are required to be reported and investigated in the same manner as BASF incidents.
 - Contractors must participate in the investigation process, as defined in BMEHS-002.036, Contractor EHS Management.
- Area supervision is responsible for assigning a team to conduct the investigation. Investigation requirements are as required by the corporate Incident Management requirements document N-R-EHS-001 Incident Management. A summary of these requirements is found in Addendum 3: Potential Severity Rating, Incident Management Actions.

3 Notifications and Immediate Actions

Category of Incidents

- emergencies - incidents at BASF locations that initiate the unit or site emergency procedures and

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where those procedures make the proper notifications by alarms or other procedures. Please see the Beaumont Site Emergency Action Plan for requirements for reporting and responding to these incidents.

- minor Incidents - incidents in which the task can normally be completed before notifying supervision of the incident; include but are not limited to small cuts or scratches, and low potential severity near-misses. Report these events as soon as practical but no later than the end of the work shift.
- standard notification incidents - These are all other incidents that are neither an emergency nor a minor incident and must be reported to unit/department supervision as soon as possible.

Immediate Actions & Incident Notification –

All Employees shall *verbally* inform their immediate Unit/Department Supervision of all incidents. Immediate Actions include the following:

- In the event of an incident, appropriate immediate actions must be taken to minimize consequences to human health and environment, including activation of emergency response procedures, as necessary.
- All personnel must notify their supervisor or manager of any incident of which they become aware, as soon as possible.
- As appropriate, evidence must be preserved, and an initial investigation conducted to gather facts about the incident.
- Incidents must be reported internally, based on their actual outcome, in accordance with N-ID-OSA 010: Incident Notification and Reporting.
- Incidents must be reported externally (e.g., to authorities) as legally required and locally regulated.
- The previous steps are time sensitive and must be conducted as soon as practicable but no later than 24 hours after the incident.

Incident Notification – Next Levels of Management

Any incident involving the incidents listed in Addendum 6 shall be reported immediately to the next level of management by unit/department supervision, as appropriate for the incident. This notification is required to be made through confirmed communication. Voicemails are not an acceptable means of making this communication.

The auto notification functionality of the AIM System will serve as notification for minor incidents not covered by the chart.

Status Information

Communicate the change in status of enforcement details, potential citations or notices of violation (NOVs) to site management and the EHS manager as soon as practical.

Investigation – Preliminary

After incident mitigation, an initial investigation shall begin as soon as practical but not later than 24 hours. Unit/department supervision is responsible for gathering facts and preserving data needed to conduct a formal investigation and for proper reporting. Recording basic information on the first page of an incident report in AIM is one method to document the beginning of the investigation.

Attachment 8 may be used to aid in gathering the appropriate information.

Potential Severity Rating (PSR)

Determine the potential severity as soon as practical after the incident, and enter the rating in the incident report, so that the proper incident investigation team can be notified.

Refer to N-R-EHS 001: *Incident Management*, Section 5.2 to classify actual and potential severity.

Incident Classification-

Once the preliminary investigation has been completed, the incident must be classified in one of four levels: 1–Moderate, 2–Significant, 3–Serious or 4–Catastrophic, by a person trained in the use of the risk matrix, proceeding as follows:

- Determine the incident level based on the actual outcome by using Table 3.9.1. If additional information

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regarding factors TQ and M are necessary, refer to Table 3.9.2.

- Determine the potential severity and probability by applying the criteria in Tables 3.9.3 and 3.9.4, along with available information from any similar past occurrences.
- Determine the incident potential using the simplified BASF Risk Matrix (Figure 3.9.1), based on the BASF Global Risk Matrix (Figure. 3.9.2).
- Assign an incident level to the incident potential using the criteria in Figure 3.9.3.

4 Contract/Contractor Employee Incidents

Reporting Incidents - Contract Employee (Contingent Staff) and Contractor Employees –

All incidents involving Contract Employees and Contractor Employees shall be reported immediately to their company's supervision and to the BASF unit / department supervision where work is being performed in accordance with site reporting requirements.

Contract Employee/Contractor Employee Incident Investigation –

Incident investigation is the responsibility of the BASF operating unit/department that has control of the incident. BASF will lead investigations for incidents that originate under its operation (spills or releases, fires, plant upsets, etc.) and in designated contractor work areas (i.e., contractor office buildings, etc.).

Contractor Employee Incidents Added to AIM Database –

The BASF operating unit/department will enter incidents involving Contract and Contractor employees into the AIM database. Approvals will always contain the minimum approvals as stated in Section 11 of this procedure.

NOTE: The AIM database is not to be used by Contractors to meet regulatory requirements. Where Contract Employee/Contractor Employee companies create separate incident reports they shall be attached in the AIM report. Do not include injury/illness diagnosis or any attachment that gives personal information.

5 Additional Notification Requirements by Classification

Permit/Regulatory Deviations

The unit or department manager shall ensure that deviations are reported immediately after initial mitigating action is taken by contacting the EHS contact. The EHS contact will notify the regulatory agency and as necessary will follow up with site/unit management and the BG EHS manager.

Inspections/Citations/Notices of Violation (NOVs)

Receipt of state, federal, or provincial agency inspections/citations/NOVs requires that:

- immediate (within the hour) notification be given to:
- the EHS contact, and
- site/unit management
- that the EHS contact give same-day notification to the EHS BG leader
- Although triggered by a previous incident or event, enter these items into the AIM database as new and separate reports. Inspections resulting in findings shall have root cause determination and corrective actions to prevent recurrence. Reference related incident reports in the description. Use the "Link Report" feature in the AIM database.

Incident Notification – Regulatory

Immediate Notifications of EHS are required for incidents that require regulatory notification and internal BASF notifications as required by law, regulation, or internal BASF guidelines.

Odor Complaint

In the event of a Spill/Release/Incident where an odor is present, immediately notify security with the complaint and the complainants contact information so that EHS can be properly notified. EHS will utilize the Odor Complaint Guidelines in Addendum 5. The complainants will be notified of actions taken to resolve the complaint.

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6 Additional Steps Loss of Containment Incidents

When there is loss of primary containment, the shift supervisor shall immediately make a first evaluation/determination as to the quantity/severity of the incident/release. This is essential to be done immediately after the discovery is made, but no later than 24-hours after discovery of the leak. If the release is a significant quantity and the unit is unable to make a determination on the release amount, notify the EHS Department to begin making Environmental Agency Notifications

If a shift supervisor is unable to make a determination, unit management should be notified, and a unit engineer should assist with determining the release amount.

After a determination has been made, the unit representative should consult the site's Release Thresholds List, available on the EHS section of the Beaumont Website. If a release threshold has been exceeded, the appropriate EHS specialist shall be notified immediately. This notification should be made immediately upon discovery of the incident becoming an RQ. For practical purposes and by BASF corporate policy immediately means within 15 minutes.

For all loss of containment incidents, the Shift Supervisor will complete all information required in an AIMs report for the incident describing in detail the events that led to the incident and the estimated amount of the release.

Any significant spills or leaks which occur in containment should be reported and evaluated for hazardous waste characteristics prior to cleanup. Some substances can become hazardous wastes upon being leaked or spilled and must be cleaned up and disposed of appropriately and cannot be sent to the site's injection wells. **(See the Beaumont Site Reportable Quantity list - RCRA Code column- on the Beaumont website. A Code listed in this column indicates the material potentially could be a hazardous waste.**

7 BASF and AP Incident Reporting Requirements

Also refer to Addendum 2: *Incident Reporting Requirements Chart*.

Initial Incident Report in AIM

Submit initial incident reports in AIM the same day of the incident immediately after taking action to minimize consequences to human health and environment, including activation of emergency response procedures, as necessary. Under unusual circumstances, the report can be entered as soon as possible given the incident but no later than the end of the next business day or end of the next shift.

Completing and submitting information in the first tab in the AIM database and then identifying the relevant classification types in subsequent report tabs satisfies the initial report requirement to the GID.

Note: Security Incidents shall be reported to Site Security and/or recorded in the Ethics Point Security Database at the following link:

<https://basf.ethicspointvp.com/custom/basf/forms/security/>

Initial One Pager - Flash Reporting North America

Recordable injuries for any BASF employee, Contract Employee (Contingent Staff), or Contractor Employee, or Potential Severity Rated (PSR) incidents 4 or 3, or Incidents meeting the criteria for Process Safety Incident (PSI).

The management of the Site / department where the event occurred should prepare a statement. The preparer should then send the communication to the regional president, SVP of the RBU, vice president and/or director of the employee, VP Site EHS Services NA and the SVP of NCU.

Rapid Incident Report (RIR)

Rapid Reporting is the reporting of Major Incidents within BASF Group Companies, BASF majority

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holdings, and joint ventures with operational control. This will ensure BASF senior management is informed in a timely manner and, if necessary, crisis communication is activated and assistance by internal specialists is assured.

- Site Management – Notify within 2 hours the BASF Emergency Response Hotline (800-832-4357), press Option 1 to begin corporate and group notifications. Please note the Emergency Response Hotline is answered by Chemtrec from 1630 until 0700. Chemtrec will document the call and forward the information to the Corporate ER on-call staff for follow-up.
- BASF Emergency Response Staff – Notifies Incident support team chairperson and the BASF Fire Department (GUS/F) at Ludwigshafen as required.
- Refer to Attachment 4 – Rapid Report Form in the Related Documents section for types of incidents, reporting details and form.

Flash Reporting

Major Incidents Ludwigshafen - This Flash Report is used to further communicate Rapid Reports. BASF NA Emergency Response will notify the Site of the need to complete a Flash Report after the Rapid Report has been submitted. The Site will complete the PowerPoint form and return within 48 hours to the BASF ER Staff. BASF ER staff will send by email to the distribution list within 24 hours.

Rapid Incident Reporting (RIR) Follow-up

The site will follow up as necessary through the BASF emergency response group and incident support team chairperson.

Communication of Lessons Learned - GIS and GSA Flash Reports

Information on incidents that provides a learning lesson to BASF is communicated within BASF Group to avoid reoccurrence of such incidents. A Global Incident Sharing (GIS) shall be developed for each incident with a severity potential of fatality (level 4) or irreversible damage (level 3) for incidents with a learning potential for BASF Group. Site or Local / regional EHS will develop the one-pager incident sharing, as soon as possible after the incident investigation using the Global EHS Sharing and Learning Portal to initiate the GIS. The link to the EHS Sharing and Learning Portal is below.

In addition, the site will develop a Global Safety Alert (GSA) flash report for relevant findings from risk assessments, safety inspections, etc., that could result in a severe impact in other BASF locations. The GSA flash report should include applicable countermeasures.

To initiate an incident sharing one-pager report, click on this link [Global EHS Sharing and Learning Portal](#). Instructions for adding an incident sharing one-pager report can be found at this link [Create Incident Sharing](#).

8 Externally Reportable Incidents

OSHA-Reportable Work-Related Incidents

Site Management must report the following OSHA-reportable work-related incidents to the OSHA area office:

- any employee fatality within eight (8) hours
- any in-patient hospitalization of one (1) or more employees within 24 hours
- any employee amputation within 24 hours
- any employee loss of an eye within 24 hours

If the OSHA area office is closed, call 1-800-321-OSHA or 1-800-321-6742. Site management will ensure that OSHA is informed, normally through the EHS contact. If possible, talk to a person, and document all information given in detail. (For detailed information on these reporting aspects, refer to the link to Attachment 3: OSHA FAQs on Reporting Serious Injuries.

OSHA-Reportable Incidents to Contract or Contractor Employees

The employee's company is to report incidents that result in a death of a contract employee

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or contractor employee or in-patient hospitalization, amputation, or loss of an eye. BASF site management will ensure that each company involved understands the contact requirements per the OSHA time frame specified in Section 8.

Recordable Incidents

The Site EHS Safety Specialist will ensure that recordable injuries and illnesses are added to the OSHA 300 log within seven (7) calendar days.

OSHA Summary Form

The OSHA 300A form must be displayed from February 1 to April 30 with the summary of injuries/illnesses from the previous year. The form must be displayed in each of the areas where the employees report to work in conspicuous place(s) where notices to employees are customarily posted.

Reporting of Accidental Releases to the Chemical Safety Board (CSB)

To ensure the Chemical Safety Board (CSB) receives prompt notice of accidental releases within its jurisdiction, an owner/operator of a stationary source must report any accidental release resulting in

- a fatality,
- serious injury or
 Serious injury means any injury or illness that results in death or inpatient hospitalization. Inpatient hospitalization is a formal admission to the inpatient service of a hospital or clinic for care.
- substantial property damage
 Substantial property damage means estimated property damage at or outside the stationary source equal to or greater than \$1,000,000. Property damage means damage to or the destruction of tangible public or private property, including loss of use of that property.

Issuing a Report

If an accidental release meets the requirements a report may be made by email to: report@csb.gov, or by telephone at 202-261-7600 in one of two forms:

If a site has submitted a report to the National Response Center (NRC), they can meet the CSB reporting requirement by submitting the incident's NRC identification number to the CSB within 30 minutes of submitting a report to the NRC, or

If a site has not submitted a report to the NRC and notified the CSB, they must submit a report directly to the CSB within eight hours of the accidental release and must include the required information listed below. The CSB will allow corrections or updates to reports when the owner / operator has additional information regarding the incident.

9 Environmental Agency Initial Reporting

If it is determined that an RQ Release amount has been exceeded, the following steps are required to be taken immediately.

The shift supervisor shall notify the responsible environmental specialist, or the on-call EHS specialist for after-hours events.

This notification shall include the following information:

- The identity of the material

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- CAS # (if applicable)
- The date/time, duration, and location of the spill/release
- The amount spilled
- The portion that was lost to environment (i.e. land, water or air).

The Environmental Specialist will verify the information to confirm whether the regulatory agencies should be notified.

The Environmental Specialist will report all Environmental Incidents that are classified as Reportable Environmental Incidents to the appropriate agency(s).

The Environmental Agencies should be contacted in the following order:

1	National Response Center (EPA)	notification by phone or NRC website (800) 424-8802
2	LEPC – Jefferson County	(notification by Fax or e-mail) (409-835-8767 fax
3	State Emergency Response Center	(notification by phone) 800-832-8224
4	TCEQ Regional Office	(notification by STEERS website)
5	General Land Office (GLO)	(notification by phone, if applicable)

The incident must be fully investigated with corrective actions, release calculations, and root cause analysis completed, and the AIMS report completed before 14 days from the ending date and time of the incident. This must be completed in less than 14 days to allow the Environmental Specialist to complete the STEERS report in less than 14 days. Failure to complete the final STEERS report within 14 days will result in a Deviation and potential fines.

Process Safety Management (PSM) and Risk Management Plan (RMP) Incidents – US Only

Refer to N-R-PRS 001: *Process Safety* for all requirements.

Initiate an incident investigation as promptly as possible but not later than 24 hours after the incident.

Establish an incident investigation team consisting of at least one (1) person knowledgeable in the process involved including a contractor company employee if the incident involved personnel from a different company and other persons with appropriate knowledge and experience to thoroughly investigate and analyze the incident.

Review the report with all affected personnel whose job tasks are relevant to the incident findings including contract employees (contingent staff), or contractor employees where applicable.

For RMP incidents, the investigation must include, and the incident report must document, the following items in addition to the standard information in the AIM report:

the potential off-site impact to human health and the environment

- on-site impacts (injuries and significant property damage)
- off-site impacts (injuries, evacuation, sheltering in place, property damage and environmental damage)
- if off-site responders were notified; e.g., Fire Department, Local Emergency Planning Committee (LEPC)
- duration of release

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10 EcoweeK Reporting

Events to Report to ECOWEEK

Incidents that require reporting via the ECOWEEK reporting procedure include:

- Potential Severity Rating 4 or 3 incidents (formerly A or B incidents)
- citation/notice of violation, notice of enforcement
- recordable injury or illness to BASF employees, contract employees (contingent staff), or contractor employees
- permit exceedance / excursion
- CERCLA / EPCRA reportable quantity (RQ) spills as dictated by state or federal requirements
- process safety events resulting in a PSI (formerly FER)
- major incident

Information Reported to ECOWEEK

Events reported to ECOWEEK shall comprise an Incident summary that includes:

- date
- incident classification
- when, where, and what happened
- how it happened (briefly, if known)
- chemical or substance involved, where applicable
- amount released to air, land or water (if spill or release) and
- job title of employee, (if injury or illness)

ECOWEEK Incident Summary

The EHS contact is responsible for the initiation, site approval, and transmission of the incident summary to the EHS manager. For sites that do not have an assigned EHS contact, the site manager (or designee) is accountable for initiation, approval and transmission.

Enter the summary into the AIM database under the ECOWEEK section.

The EHS manager (or designee) sends the ECOWEEK incident summary to the ECOWEEK mailbox within 72 hours of becoming aware of the incident, preferably by Monday of the week following the incident.

11 Incident Reporting in AIM

The Accident / Incident Management (AIM) database system will be used to report and document Incidents.

A report coordinator(s) is assigned to each incident report and is responsible for managing the flow of incident reporting. The Report Coordinator is notified as soon as an incident has been submitted. The Report Coordinator is responsible for ensuring; required reporting sections are entered on time (e.g. ECOWEEK, GID reporting, OSHA information), initiating the investigation, ensuring completed fields have accurate data (e.g. title, description, causes, action items), submitting the report for approval, and ensuring the report is closed.

Information required to submit a preliminary report is notated by a red asterisk and the GID required information is notated by a blue "GID Required" in the database. This information is required to be input by the shift/area supervisor or the person filling out the report within 24 hours of the report being submitted.

Recording the Injury/Illness –

Record Injury/Illness, Health Exposure, and Near Miss classifications under the unit or department where the Employee is assigned, unless:

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- i. The incident occurs while working on a site other than employee's home site; then record the injury under the site being visited.
- ii. The incident is a result of work performed on behalf of another operating unit/department; record the incident under the unit/department that has most control over the cause of the incident. For example, work conducted under a Safe Work Permit or SOP, an unsafe condition, spill or release, or other emergency situation would be attributed to the unit or department of the owning process.
- iii. Record all other incident classifications under the owning unit/department. Refer to the flowchart in Addendum 1 – Recording the Injury/Illness.
- iv. Injuries and Illness of BASF personnel from another country working at one of the BASF NA facilities is recordable under the site where the incident occurred and the business group for which the person is working or visiting at the site. This includes recording in AIM and the regulatory forms of the country where the incident occurred as necessary.

The Incident Report-

Description - Include information about how, where, and when the incident occurred. Include basic information about the injury, like cut to right hand or strain to lower back. This information is the basis for the incident investigation.

For injuries/Illnesses, do not use the name of the employee. Use the term "employee", "operator" or "technician" instead of using "he" or "she". Do not include the diagnosis or any attachment that gives personal information in the body of the report. When personal performance is a cause of an incident, an explanation should always be given; however, do not use specific references that are personal and confidential. It is acceptable to identify matters of frustration, rushing, fatigue, or complacency. Specific medication, home, mental, or other personal health issues shall not be entered in the report. In addition, do not list specific disciplinary action taken.

Root Cause and Corrective Actions

Root Cause - The Incident report shall include identified root causes and assigned corrective actions in accordance with the criteria for Level 1, 2, 3, or 4 incidents.

Corrective actions - Should focus on items that will prevent recurrence of identified root causes. Action items must be verified for completeness (VC) and verified for effectiveness (VE) for all Level 2, 3, or 4 incidents or if corrective actions are included in Level 1 investigations. Verification requirements are managed within the AIM database, the person and the method for verification must be determined before entering action items into the AIM.

For Potential Severity Rating 4 or 3 Incidents – The VE in AIM must be used for applicable action items. Applicable action items are those that are related to root causes of the incidents that will prevent recurrence. Action items with VE must be verified effective by the Site or Unit Manager (or designee).

Global Incident Database (GID) Reporting

GID reporting:

1. Includes specific AIM reports that are injuries (first aid or greater), RQ spills/releases, near-hit (injury/illness potential or high potential severity) and all process safety events.
2. Should be reported into the local database, so that incidents are recorded in the GID within 24 hours
3. These specified newly created or updated reports are automatically transferred to the GID daily.
4. All global data fields in AIM must be completed by the second working day following the close of the month in which the incident occurred for LTIs and PSIs.
5. These specific AIM reports are included in global monthly reports that are issued between the sixth and twelfth days of each month.

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6. AIM reports that are in a “submitted” status need certain fields completed before the sixth calendar day, so that GID reporting can be as current as possible.
7. AIM reports in “submitted” status must have as a minimum the injury type, spill/release type, or process safety type entered to tag it for transfer to the GID. Near-hits must have the near-hit type and the potential severity rating entered to tag it for transfer to the GID. Incident reports with a status of “pending approval,” “final-pending,” and “closed” contain all the necessary information for global reporting for the prior month’s incidents
8. Send e-mail reminders on the first day of each month for AIM reports with missing information. Identify the relevant fields in the AIM incident form.

Incident Report Approval

Minimum approvals include:

- two (2) signatures: Unit, Group, or Department Manager and EHS contact
- Other Approvals: based on the Actual or Potential Severity, classification of incident, or the individual site or business group.

The two minimum approvals are responsible for the overall accuracy of the report, agreement of causes, and agreement of the corrective measures. Other approvers are responsible for the same items that are within their area(s) of responsibility.

See Attachment 8 for an incident approvers checklist that may be used as a guide during approvals

Potential Severity Ratings 4-Catastrophic (formerly A) or 3-Serious (formerly B) require SVP approval. PSR 2-Significant (formerly C) incidents require the next level higher than that appointing the investigation team.

AP Agreement – Since the requirement for higher levels of approval in N-ID-OSA-010 is different in the body of the implementation document than in the summary chart for report approvals. Any reports requiring a one-pager, as defined in Section 7 of this document, will include sign off of the VP of Operations, AP.

The incident investigation must be completed timely to meet all state and regulatory requirements

Incident investigations and reports for all incidents should be completed as soon as practical after the incident occurs with a recommended target date of within 30 days of the incident. Timely completion of investigations and identification of corrective actions are paramount to preventing incident reoccurrence. NOTE: Other required information time frames for Global Incident reporting, OSHA reporting, and other agency reporting must still be adhered to.

12 Incident Investigation

Investigation Requirements vary by incident severity rating. Incident investigation requirements can be found in **N-R-EHS 001 - Incident Management**. Incident investigations shall be led by someone knowledgeable in the requirements for incident investigations.

Assigning and Documenting Corrective Action

Personnel assigned corrective actions are responsible for completing and documenting the corrective action as assigned. Reference the attachment described below for the changing of target dates. Any differences in the way action items are completed from the description must be documented in the “comments” section.

Personnel outside the unit should only be assigned corrective actions with the agreement of the individual or his/her supervision.

Refer to Attachment 2: Guidance on Management of Action Items

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13 Training

Personnel must receive training in the following areas:

- initial incident notification for all BASF employees, contract employees (contingent staff), and contractor employees
- incident reporting for personnel who enter or complete incident reports
- training in root cause for personnel as defined in the BASF EHS Curriculum Assignment Process

The EHS Curriculum Assignment Process defines the BASF personnel training process.

N-ID-OSA 034: *Contingent Staff EHS Management* specifies contract employee training, and N-ID-OSA 002: *Contractor EHS Management* specifies contractor employee training.

14 Employee Involvement

Employees are involved in the incident notification and reporting process. Examples include but are not limited to:

- informing employees of how they are to report an incident
- providing a contact list for employees to contact supervisors or managers promptly, even during off hours
- involving employees in the incident investigation process as appropriate
- sharing incidents as appropriate and as regulations require

15 Record Retention of Incident Reporting

The AIM database is the record retention tool for incident reports. AIM will archive all reports into a separate archive database. Remove reports in accordance with the longest record retention schedule for incidents in BC037: *Records Management Policy*. If you are keeping any other files associated with these incident reports, you must reference them in the incident report and retain them according to this records retention policy.

16 Definitions

Accident/Incident

An event that has or could have resulted in adverse health effects, process safety events, damage to property or harm to the environment.

Manage regulatory inspections/citations/deviations as events. This document refers to these events as incidents and classifies them as, but not limited to the following:

Near-Hit / Near-Miss	Property Loss	Contractor
Process Safety Event	Citation / Notice of Violations	Contractor Injury / Illness
Injury / Illness	Health Exposure	Contract Injury / Illness (Contingent Staff)
Spill / Release	Inspection	Process Safety Management
Permit / Regulatory Deviation	Major Incident	Plant Upset
Fire	Non-Occupational	EHS Management System Failure
Odor Complaint	Risk Management Plan	Other

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Unsafe acts and unsafe conditions could have the potential to cause one of the above classifications and may be entered under a Near-Hit / Near-Miss. Enter minor unsafe acts and conditions into a system with a shorter form. Refer to Attachment 1: *Definitions and Explanations of Classifications* for detailed descriptions of classifications.

AIM

The accident / incident management (AIM) system used for incident reporting

Contract employee (contingent staff)

A non-BASF worker for whom BASF provides supervision of his/her day-to-day activities and direction as to how an activity is to be performed; often referred to as contingent staff, leased, or temporary employees.

Contractor employee

A non-BASF worker for whom BASF does not provide supervision of his/her day-to-day activities or direction as to how an activity is to be performed

Note: In this procedure, a contractor employee includes subcontractors.

Control System or Control Device

A control system or control device is any part, chemical, machine, equipment, contrivance, or combination of same, used to destroy, eliminate, reduce, or control the emission of air contaminants to the atmosphere. For example, the DMTA Incinerator, DMTA Emergency Flare, Dicamba Fume Burner, Dicamba Process Flare, scrubbers, or carbon absorption systems are emission control devices.

Days Away from Work (DAFW)

The number of days that could not be worked due to an occupational injury/illness.

Days Away from Work Case (DAFWC)

An occupational injury/illness that causes missing scheduled work days or requires absence calendar days from work when recommended by physician or Health Care Professional.

Deviation (Environmental)

Any exceedance, divergence, departure, or variation from a regulatory or permit limit requirement or threshold

ECOWEEK summary

A brief narrative of an Environmental, Safety, Industrial Hygiene, or Process Safety incident as described in Section 10 of this document that is submitted to the ECOWEEK mailbox and compiled into a weekly report.

EHS contact

Assigned resource from an EHS to a BASF site, unit, or business function.

Employee(s)

For this document only, any BASF employee or contract employee (contingent staff) for whom BASF provides direct supervision in his/her day-to-day activities and direction as to how an activity is to be performed.

Environment

The "navigable waters....any other surface water, groundwater, drinking water supply, land surface or subsurface strata, or ambient air "Environmental Incident/Event.

Environmental Incident/Event

Any event including but not limited to: upsets; scheduled or unscheduled maintenance activities; startups, or shutdowns which impacts the environment; and which results in an unauthorized release, emission, or discharge to the environment. Such an event could potentially trigger state or federal agency reporting. These events are to be reported internally through the verbal notification procedures and the AIMS incident report system. Environmental Incidents consist of the following:

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- smoking flare or excessive opacity (5 min. in a 2-hour period)
- visible emissions from heaters (6 min. in a 2-hour period)
- odor that has the potential to have off-site impact
- any event that creates a Public Nuisance
- oil sheen, foam, debris or discolored ditches
- explosion or fire
- a flaring event that exceeds permitted allowable limits in the permit(s) MAERT Tables
- any permit or regulatory limit threshold exceedance or deviation
- any unauthorized release or unauthorized discharge.
- A process operation or upset that results in an unauthorized release or unauthorized discharge.
- An unauthorized maintenance operation that results in an unauthorized release.
- Expected or Unexpected shutdown of a unit that results in an unauthorized release to the environment.
- Start-up of unit that results in an unauthorized release to the environment.
- Outage of a control system or control device.
- Outage of a permit required continuous monitoring system (CMS) used to demonstrate continuous compliance or operation.

Additionally, any significant spills or leaks which occur in containment should be reported and evaluated for hazardous waste characteristics prior to cleanup. Some substances can become hazardous wastes upon being leaked or spilled and must be cleaned up and disposed of appropriately. (See the Beaumont Site Reportable Quantity list – RCRA Code column – on the Beaumont website. A Code listed in this column indicates the material potentially could be a hazardous waste.)

First Aid Cases

For the purposes of Part 1904, "first aid" means the following:

- Using a nonprescription medication at nonprescription strength (for medications available in both prescription and non-prescription form, a recommendation by a physician or other licensed health care professional to use a non-prescription medication at prescription strength is considered medical treatment for recordkeeping purposes);
- Administering tetanus immunizations (other immunizations, such as Hepatitis B vaccine or rabies vaccine, are considered medical treatment);
- Cleaning, flushing or soaking wounds on the surface of the skin;
- Using wound coverings such as bandages, Band-Aids™, gauze pads, etc.; or using butterfly bandages or Steri-Strips™ (other wound closing devices such as sutures, staples, etc. are considered medical treatment);
- Using hot or cold therapy;
- Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid other systems designed to immobilize parts of the body are considered medical treatment for recordkeeping purposes);
- Using temporary immobilization devices while transporting an accident victim (e.g., splints, slings, neck collars, back boards, etc.).
- Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister;
- Using eye patches;
- Removing foreign bodies from the eye using only irrigation or a cotton swab;
- Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means;

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- Using finger guards;
- Using massages (physical therapy or chiropractic treatment are considered medical treatment for recordkeeping purposes); or
- Drinking fluids for relief of heat stress

Incident notification

The verbal communication process required to ensure Incidents are initially communicated and managed properly

Incident reporting

The written communication process required to manage the collection, dissemination, approval, and archiving of Incidents using AIM or an approved paper form

injury or illness

An abnormal condition or disorder caused by exposure to environmental factors associated with employment; may be further classified into one of the following injury/illness types:

- injuries with no treatment
- illnesses with no treatment
- first aid Injuries
- first aid Illnesses
- recordable Injury or Illness

Major incident

An incident that results in:

- fatality – any incident resulting in death that is caused by BASF business activities, including criminal acts against BASF
- severe Injury – hospitalization of any person injured by BASF business activities that is expected to last longer than 24 hours
- significant damage – direct damage to buildings or equipment exceeding > €500,000
- significant production interruption – unexpected/unplanned production loss exceeding a value of €500,000 because of process, energy or utility failures (Value is the sum of running fix costs, not gained profit and additional costs.)
- environmental damage – off-site accidental material release h an actual or expected impact to any person or the environment exceeding thresholds (100 kg. (220 lbs.) of any UN dangerous goods and/or > 1000 kg. (2200 lbs.) of any non-UN dangerous goods). For on-site releases, see significant damage, significant production interruption and public impact
- public impact – incidents occurring off-site or on-site that could cause a negative perception of
- the company in the public, by authorities, or in the media
- security incident - incidents that are caused by or related to a breach in security and leading to above-mentioned consequences

Near Miss

An incident in which no injury, illness or significant property damages occurred but the potential was present.

Nuisance Complaint

Any complaint that the site is creating a nuisance that has resulted in adverse environmental effects that affect the community. Examples of nuisance complaints are excessive noise, odor, fog, smoke or vapor cloud that could affect the public.

Occupational Illness

Any abnormal health condition or disorder, other than one resulting from an occupational injury, caused

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by exposure to environmental factors associated with employment, such as acute and chronic illnesses and diseases which may be caused by Inhalation, absorption, injection, ingestion, or direct contact.

Occupational Injury

An occupational injury is classified as a death, loss of consciousness, administration of medical treatment, temporary assignment to other duties, transfer to another job, or an inability to perform all duties on any day after the injury.

Examples of physical occupational injuries include:

Any physical injury, such as, cut, abrasion, fracture, sprain, amputation, condition from chemical exposures results from a work-related incident or single instantaneous exposure in the work environment.

OSHA-reportable incidents (U.S. only)

Incidents that must be reported directly to OSHA that result in:
the death of an employee, contract employee (contingent staff), or contractor employee within 8 hours of the work-related incident;
amputations or loss of an eye that occur within 24 hours of the work-related incident for these employees; or
in-patient hospitalization of one (1) or more persons within 24 hours of the work-related incident

Permit Exceedance

Any violation of permit conditions, limits, allowable emission rates, or concentration limit in an air or water permit issued to the Beaumont Site.

Permit/regulatory deviation

An event that results in any exceedance, divergence, departure, or variation from a regulatory or permit limit, requirement or threshold and is reportable to a regulatory agency. For reporting purposes, an event resulting in multiple Permit / Regulatory Deviations shall be counted as a single incident, regardless of the number of deviations attributed to the event.

Deviations include but are not limited to:

- permit exceedance / excursion – exceeding a pollutant-based limit (e.g., mass emission rate, concentration) in a permit or a permit by rule
- deviation from an operating parameter requirement in a permit or regulation (e.g., temperature, pressure, opacity)
- other – any administrative deviations including but not limited to: failure to test, monitor, sample, record, report, notify, or perform such activities as is required by applicable regulations or permit release of a substance more than the reportable quantity as defined by a regulatory agency
- with jurisdiction
- an event that results in an unauthorized release of a substance (substance not limited by permit)

Plant Upset

An incident that is defined as any unintended or unanticipated event in the process that causes or has the potential to cause business impacts. This is not intended to include incidents where a backup of the equipment is available in the event of a failure. Where a backup existed but was not in service or otherwise did not function properly when needed, this is considered a plant upset.

Potential Severity Rating (PSR)

An incident assessment that identifies the worst reasonable potential outcome independent of the actual outcome (**formerly A/B rating**); reference N-R-EHS 001: *Incident Management*.

Process Safety Event

An incident caused by a failure of equipment or instrumentation that resulted in or could reasonably

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have resulted in serious adverse effects on safety, health or the environment. Examples include but are not limited to:

- Fire/explosion/deflagration in any part of the plant
- Opening of an emergency relief device
- Near-miss involving a potential or actual runaway reaction
- Overpressure of equipment
- Failures in engineering or administrative controls
- Mechanical failures, and
- Release of (highly hazardous) chemicals in the workplace

Property Loss/Damage

An incident that results in loss of property (i.e. material or equipment)

Recordable injury or illness

An injury or illness is classified as “recordable” if it is a new work-related case that results in one (1) or more of the following:

- medical treatment beyond first aid
- restricted duty (includes job transfer or re-assignment)
- days away from work
- a work-related fatality
- loss of consciousness, or
- significant Injury or Illness diagnosed by a physician or other licensed health care professional

Note: Refer to Attachment 1: *Definitions and Explanations of Classifications* for more detailed descriptions of injuries and illnesses.

Reportable Quantity (RQ) Spills/Releases

These are State or Federally defined quantities, which if released in an amount greater than or equal to the listed amounts to the land, water, or the atmosphere must be reported to the appropriate state or federal agencies within the prescribed time. If a chemical is not specifically listed in the Federal list, then the RQ amount defaults to 100 lbs. For Federal RQ's the report time frame is “as soon as possible” (defined by BASF as within 15 minutes of determining that a Reportable Quantity of material was released). For State / TCEQ (Texas Commission on Environmental Quality) RQ's, the time frame is “As soon as practicable, but not later than 24 hours after the discovery of an emissions event”. All reports to the agencies will be made by the Environmental Specialist for the area responsible for the release during normal working hours, or the Environmental On-call Person on nights, weekends and Holidays after receiving information from the Shift Coordinator and verified as accurate. Spills/Releases above an RQ are regarded as Agency Reportable Environmental Incidents. Reportable Quantities for the Beaumont Site can be found in the Reportable Quantity list on the Ecology portion of the Beaumont Site website.

Reportable Agency Incident

Those releases or permit exceedances that exceed the Reportable Quantity (RQ) or are visible to the public, exceed permit limits, or have the potential to affect the community (i.e., odor, sound, visible, oil on water, smoking flare, etc.). Other incidents that may be reported to the agency include unplanned, unanticipated and emergency shutdowns and maintenance.

Reportable Site Incident

Report all environmental incidents to the Shift Supervisor. These are to be reported to the Shift Supervisor and subsequently reported through AIMS. Once reported to Shift Supervisor, incidents should follow the steps outlined in this procedure to determine if it is an agency reportable incident or only a site reportable incident.

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Restrictive Duty Case

An occupational injury or illness, as a result of which, an employee is assigned to:

- keeps the employee from performing one or more of the routine functions of his or her job, or from working the full workday that he or she would otherwise have been scheduled to work; or a physician or other licensed health care professional recommends that the employee not perform one or more of the routine functions of his or her job, or not work the full workday that he or she would otherwise have been scheduled to work.
- another job on a temporary basis
- a permanent job less than full time
- A permanently assigned job, with elimination of some of the duties normally required

Restrictive Duty Days

The number of restricted work activity days that result from an occupational injury or illness

Count the days of job transfer or restriction in the same manner days away from work is tabulated. The only difference is that, if an injured or ill employee is permanently assigned to a job that has been modified or permanently changed in a manner that eliminates the routine functions the employee was restricted from performing; the employer may stop the day count when the modification or change is made permanent.

NOTE: A minimum of one day of restricted work or job transfer for such cases must be recorded.

STEERS

State of Texas Environmental Electronic Reporting System. This is the TCEQ's online reporting system for reporting emissions events as well as for other media including DMR's (Discharge Monitoring Reports), waste summaries, etc.... Initial and final State RQ reports are made in STEERS. Final State reports MUST be finalized within 14 days of the end of the RQ emissions event. Events that are not finalized within 14 days could potentially receive a NOV (Notice of Violation) or NOE (Notice of Enforcement).

Unit/department supervision

Supervisors, team leaders, shift leaders, managers, or other management staff positions

Daily Life Incidents

Daily life incidents are incidents that are related to activities:

- not specific to a particular work procedure or process
- not regulated by operating instructions/procedures or covered in risk assessments
- well known to all from private life, as well
- mainly influenced by the personal behavior
- not specific to an unsafe condition in the work environment

Daily life activities have certain hazards and can also result in accidents with severe outcomes. Nevertheless, the related hazards are usually well known as people are exposed to these hazards frequently in their private lives as well. Therefore, incidents resulting from these daily life activities and without apparent/obvious causes (e.g., infrastructure or housekeeping deficiencies), have, in most cases, little valuable learning potential, even when the subject of extensive incident investigations. Because of this, few investigation efforts into daily life incidents are considered necessary/fruitful.

Note: Daily life accidents are work accidents as well and, therefore, are often subject to local legal regulations and laws regarding incident management!

The decision to classify an incident as a daily life incident or not must be taken locally, according to the specific situation and the related conditions. The examples in Table 5.1-1 provide a simple guidance.

17 References

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[BC037: Records Management Policy](#)
[BC037.001: Records Retention Schedules](#)
[EHS Curriculum Assignment Process](#)
[GIS flash report template](#)
[GSA flash report template](#)
[G-R-OSA 001: Occupational Safety](#)
[N-ID-OSA 002: Contractor EHS Management](#)
[N-ID-OSA 010: Incident Notification and Reporting](#)
[N-ID-OSA 034: Contingent Staff EHS Management](#)
[N-R-PRS 001: Process Safety](#)
[N-R-EHS 001: Incident Management](#)
[G-AP-EHS-RG-100-001: Incident Reporting](#)

Title 30 Texas Administrative Code (TAC) 101 – General Rules
30 TAC 327 – Spill Prevention and Control
Section 304 of the Emergency Planning and Community Right to Know Act
(EPCRA/CECRLA)

18 Attachments / Addenda

[Attachment 1:](#) Definitions and Explanations of Classifications



N-ID-OSA_010_a01.
pdf

[Attachment 2:](#) Guidance on Management of Action Items



N-ID-OSA_010_a02.
pdf

[Attachment 3:](#) OSHA FAQs on Reporting Serious Injuries



N-ID-OSA_010_a03.
pdf

[Attachment 4:](#) Rapid Incident Report form



N-ID-OSA_010_a04.
pdf

[Attachment 5:](#) AP Incident Reporting Requirements



G-AP-EHS-RQ-100-0
01 Incident Reportir

[Attachment 6:](#) AP EHS One-Pager Template (PDF)



G-AP-ES-RQ-100-00
1 Annex 1 OnePager

[Attachment 7:](#) AP EHS One-Pager Template (pptx)

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1 Annex 1 OnePager

[Attachment 8:](#) Preliminary Incident Information Sheet
Last page of this document

[Attachment 9:](#) Incident Approvers Checklist



Incident Report
Approvers Checklist.

[Addendum 1:](#) Recording the Injury/Illness
[Addendum 2:](#) Incident Reporting Requirements Chart
[Addendum 3:](#) Incident Management Actions for Potential Severity Rating
[Addendum 4:](#) Beaumont Site Environmental Incident Notification
[Addendum 5:](#) Odor Complaint Guidance
[Addendum 6:](#) Tables and Figures

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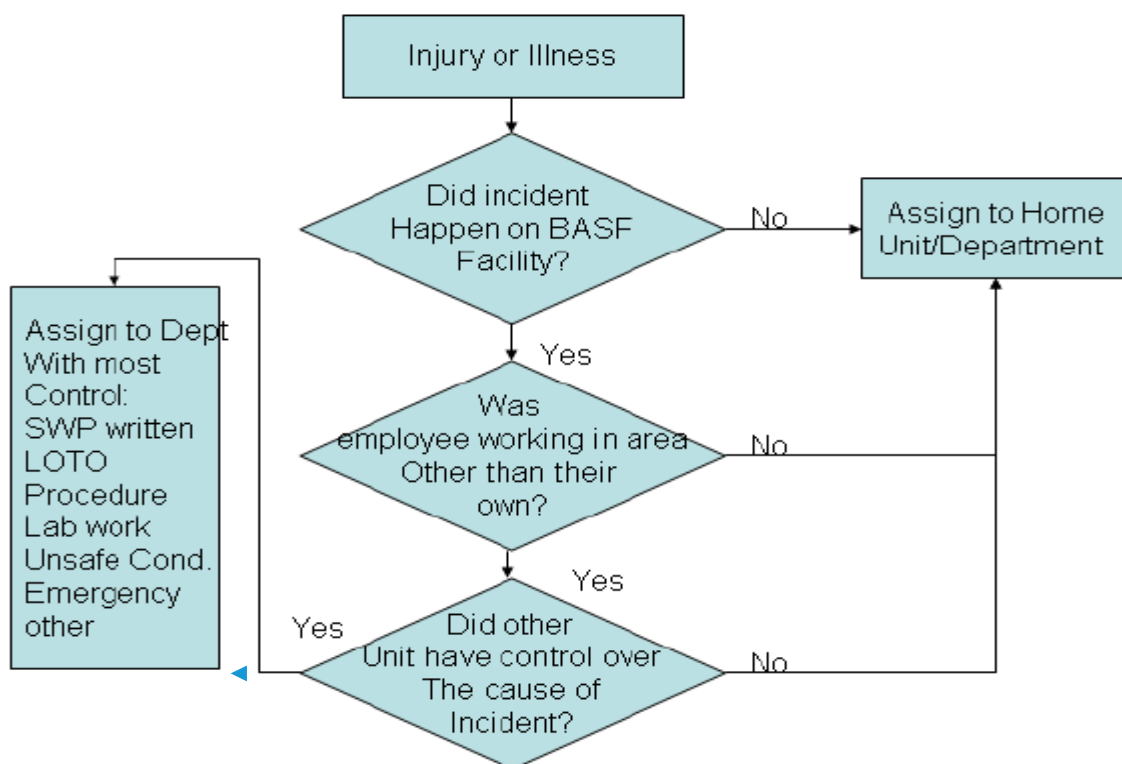
Addendum 1: Recording the Injury/Illness

Rule 1: Incidents must be recorded on the OSHA log of the facility where the incident occurred.

Rule 2: Incidents must be recorded in AIM under the facility where the OSHA log resides. The AIM report is the substitute OSHA 301 form. Both must be recorded within seven (7) working days.

Rule 3: Injuries and illness of BASF personnel from another country or site working at a BASF facility is recordable under the site where the incident occurred and the business group that the person is working for or visiting at the site.

Rule 4: Apply the following logic. For odd cases, discuss with site management, site EHS, or OSIH Expert Services.



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Addendum 2: Incident Notification Reporting Requirements Chart

Type of Report or Notification	What	When	How
Supervisor Notifications	All incidents	Immediately	Verbally
Immediate Management Notification (Higher Level)	See Addendum 6 for the chart of required notifications.	ASAP	Confirmed communication (no voicemail, emails, etc.)
AIM	All incidents	Initial report-same day unless extenuating circumstances exist; GID within 24 hours; suggested: approved in 30 days	AIM Database
Quick Information	Fatality, Lost time injury, Environmental incident, Notification to Authorities. Statement of incident, type of incident, how occurred.	Within 48 hours of knowledge of recordability.	E-mail notification- AP Pres (Fatality only) Head of APT Head of Operations Head of Global RC Head of Global EHS Head of EHS Operations NA
Incident Flash (Preliminary One Pager)	Fatality, Lost time injury, Process Safety Incident, Environmental incident, High potential incident	Within a week	PowerPoint slide – initial information: Head of APT Head of Operations Head of Global RC Head of Global EHS Head of EHS Operations NA Responsible Manufacturing Director Regional EHS contact Vice President, EHS Services USA
Final One Pager	Fatality, Lost time injury, Process Safety Incident, Environmental incident,	Within one month	PowerPoint slide – final information from investigation:

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	High potential incident		Head of Operations Head of Global RC Head of Global EHS Head of EHS Operations NA Responsible Manufacturing Director Regional EHS contact Vice President, EHS Services USA
ECOWEEK	<u>Incidents</u> PSA A or B Citation NOV recordable injury/illness Permit exceedance/excursion RQ spill/release Major incident	Within a week	AIM database
Rapid Incident Report	<u>Major Incidents</u> Fatality Severe injury Significant damage Significant production interruption Environmental damage Public impact Security incident Transport incident	Within two (2) hours to Ludwigshafen Fire Department	Phone to hot line (800-832-4357, Option 1) Electronic rapid incident (eRIR)
Chemical Safety Board	If a release results in fatality, inpatient hospitalization, or damage > \$1 Million.	Chemical Safety Board within 8 hrs.	E-mail NRC Report number report@csb.gov or telephone 202-261-7600
Communication of Lessons Learned			
GIS-Global Incident Sharing	High severity incidents. Could result in a severe	After incident report has been verified correct (generally final approval)	- Regional EHS prepares - VP approves - Global EHS posts to web
GSA-Global Safety Alert	impact to other BASF locations		- Site prepares - Regional EHS forwards to global EHS for distribution

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Addendum 3: Potential Severity Rating, Incident Management Actions

(based upon the more severe actual or potential outcome incidents)

	Rating 4 Catastrophic (formerly A)	Rating 3 Serious (formerly B)	Rating 2 Significant (formerly C)	Rating 1- Moderate or Other (formerly D)
AIM Report	Yes	Yes	Yes	Yes
ECOWEEK	Yes	Yes	Yes, if actual Recordable case and/or PSI	Yes, if actual Recordable case and/or PSI
GSA or GIS	Yes, can be exempted by approval	Yes, can be exempted by approval	As needed to share lessons learned	As needed to share lessons learned
Investigation (minimum levels of management oversight and involvement)	See 5.3 N-R- EHS 001: <i>Incident Management</i>	See 5.3 N-R- EHS 001: <i>Incident Management</i>	Simplified Investigation	Documented Incident Dialogue
Approval of ✓ Investigation ✓ Root Causes ✓ Corrective Actions	VP of Operations	VP of Operations	Management level higher than that appointing investigation team (Not intended to be level higher than Site Manager)	Unit Manager
Corrective Action Rating (CAR) Not required	Rating of Corrective Action for scope of impact in Preventing Recurrence	Rating of Corrective Action for scope of impact in Preventing Recurrence		
(VE) Verification of Effectiveness of Corrective Actions	Site or Responsible Unit Manager or Designee	Responsible Unit Manager or Designee	Optional - As determined by Unit Manager	Optional - As determined by Unit Manager

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Addendum 4

Beaumont Site Environmental Incident Notification Form	
Person Making Notification:	Date
Time:	
Location/Area of Plant and/or Equipment Involved:	
Weather Conditions:	
Temperature: degrees	Wind Direction (circle one): N NE E SE S SW W NW
Sky (circle one): PC Clear Overcast Cloudy Rain	Wind Speed (mph):
Type of Incident:	
Media Affected (circle one): Air Water Soil	
☐ RQ Release ☐ Non-RQ Release	☐ Oil Sheen on Water ☐ Smoking Flare
☐ Oil Spill ☐ Other Nuisance/Complaint	☐ Odor
Offsite Impact: ☐ Yes ☐ No	
Name of Water Body if Off-site Impacted: N/A	
Description of Incident:	
Material Name of Substance(s) Released	Amount released (initial estimation):
Measures taken to mitigate or stop release/spill/emission:	

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Addendum 5

BMT ODOR COMPLAINT GUIDE

<u>Event / Condition</u>	<u>Action(s)</u>
Odor Complaint	EHS will check fence line for odor, identify source, investigate until source found or odor desists.
Odor not expected to reach fenceline	Document reason for determination odor will not impact off-site.
Odor at fenceline or near fenceline, no public complaint	Document investigation and describe odor.
Odor at fenceline or near fenceline and public complaint	Document source and amount, (if known), complaint, and investigation.
Odor at fenceline or near fenceline and public complaint and TCEQ investigation is initiated	Document source and amount, (if known), complaint, and investigation.
Additional actions depending on source.	
Source is an authorized LDAR component.	Repair and monitor following LDAR procedure.
Source is an open vent or drain.	
MSS Activity	Minimize emissions, document MSS emissions
OEL (not exempt)	Install blind/cap/plug, document OEL non-compliance (May also be an emission event.)
Source is an unauthorized emission event.	
If greater than RQ event	NRC, LEPC, and STEERS reports, as required.
If greater than 0.01 lb/day and less than RQ	Internal recordable <RQ emission event per 101.201.
If less than 0.01 lb/day	De Minimis - Non-emission event, document.

BMT ODOR COMPLAINT GUIDE NOTES

In all cases, follow Corporate Procedure N-ID-OSA-010

In all cases, minimize emissions, employ any Emergency Response plans as necessary.

AIMS to be entered by Shift Supervisor for area with odor.

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Addendum 6 – Tables and Figures

Table 3.9.1 - Criteria for incident classification based on incident actual outcome, this table is used for internal reporting classification only, review workflow to determine appropriate level of investigation

Incident Classification		Actual Outcome(s)				
		Occupational Safety (Human Health Impact)	Fire, Explosion or Implosion	Chemical Impact beyond secondary containment	Community Impact	Environmental Impact
	1 Moderate	Other Injuries/Illnesses (First Aid/medical recordables)	Resulting in $\geq$ € 2,500 to € 250,000 of direct cost damages.	Release above TQ for which the effects are confined within secondary containment irrespective of the released amount or released quantity $\leq 5^*TQ^*M$ release with effects beyond secondary containment	Officially declared [including precautionary] shelter-in-place for ≤ 3 Hrs.	Short-term [acute] environmental remediation required with cost $\geq$ € 25,000 < € 250,000. or Required notification to authorities
	2 Significant	LTI/ RDI with reversible injury or restricted duty	Resulting in $\geq$ € 250,000 to € 2,500,000 of direct cost damages.	$5^*TQ^*M <$ released quantity $\leq 25^*TQ^*M$ with effects beyond secondary containment	Officially declared [including precautionary] shelter-in-place extending > 3Hrs	Environmental remediation required with cost $\geq$ € 250,000 < € 2,500,000. or Required detailed report to authorities
High-severity incidents	3 Serious	≥ 1 LTI with irreversible bodily damage	Resulting in $\geq$ € 2,500,000 to € 25,000,000 of direct cost damages.	released quantity > 25^*TQ^*M with effects beyond secondary containment	Officially declared evacuation ≤ 1 day	Environmental remediation required with cost of $\geq$ € 2,500,000 < € 25,000,000 or Required detailed report to authorities with expected financial penalties
	4 Catastrophic	One or more fatalities	Resulting in $\geq$ € 25,000,000 of direct cost damages.		Officially declared evacuation > 1 day	Environmental remediation required with cost $\geq$ € 25,000,000 or Required detailed report to authorities with expected significant financial penalties or potential loss of license to operate

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Table 3.9.2 - Criteria for incident classification based on incident actual outcome – Factors TQ and M

Thres hold ("TQ") [kg]	Material Hazards (H sentences)	Material Factor "M"
1	Substance H300, H310, H330 liquids with boiling point < 60 °C and gases	0.5
1	Substance H300, H310, H330 liquids with boiling point ≥ 60 °C	1.0
10	H331, H332 boiling point < 60 °C	0.5
10	H 301, H 311, H312 and H331, H332 boiling point ≥ 60 °C	1.0
10	H 302	2.0
100	H224 H220, H221	0.5
100	GHS Classified substances except mentioned above	1.0
100	H226 boiling point ≥ 60 °C	2.0
100	H 341, H 361, H 362, H 373	2.0

Table 3.9.3 – Definitions of Severity (S) within the Risk Matrix

Potential Severity	Criteria
S1	Potential for one or more fatalities
S2	Potential for one or more serious injuries (irreversible / life changing injury – examples: Severe head injury (unconsciousness, fractures), amputation, burns affecting >10% of body surface, loss of eye or sight, multiple fractures etc.)
S3	Potential for one or more LTI/RDI. Irreversible/life changing injury is not assumed.
S4	Potential for minor injuries, or irritation (First Aid Case - FAC)

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Table 3.9.4 – Definitions of Probability (P) within Risk Matrix

Probability		Criteria
P0	Frequent	It is anticipated that harm/scenario will happen (once per year or more often)
P1	Occasional	Harm/scenario may happen occasionally (approximately once in ten (10) years)
P2	Rare	Harm/scenario may happen rarely or almost happened within a plant lifetime (approximately once in 100 years)
P3	Very rare	Harm/scenario is not anticipated, but thinkable under very unfavorable circumstances (approximately once in 1,000 years)
P4	Reasonably not to be expected	Not a credible scenario, reasonably not to be expected (approximately less than once per 10,000 years)

Figure 3.9.5 – Global Risk Matrix

		S (Severity)			
P (Probability)		S1	S2	S3	S4
Frequent	P0	A	B	D1 _{os} D1 _{ps}	E1
Occasional	P1	A/B	B	E1	E2
Rare	P2	B	C	E2	F
Very Rare	P3	C	D2	F	F
Reasonably not to be expected	P4	E2	F	F	F

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Figure 3.9.6 – Simplified Risk Matrix for Incident Management Purposes

		S (Severity)			
P (Probability)		S1	S2	S3	S4
Frequent	P0	A	B	D1	E1
Occasional	P1	A/B	B	E1	E2
Rare	P2	B	C	E2	F
Very Rare	P3	C	D2	F	F
Reasonably not to be expected	P4	E2	F	F	F

Figure 3.9.7 – Correlation of Incident Level to Potential Outcome via Risk Matrix

Risk Class	Incident Level	Remark
A	4-Catastrophic	(Potential) High Severity Incident
B, C, D1	3-Serious	
D2, E1	2-Significant	
E2	1-Moderate	
F		

Figure 3.9.8 – Incident Level to Potential Outcome by Levels

			Severity			
Incident Management Potential Risk Matrix			S1 Potential for one or more fatalities	S2 Potential for one or more serious injury/illness (irreversible/life changing injury/illness)	S3 Potential for one or more LTI/RDI (non-irreversible/life changing injury/illness)	S4 Potential for minor injuries/illnesses, or irritation (first aid, no treatment, etc.)
Probability	It is anticipated that injury/illness/scenario will happen (once every year or more often)	P0 Frequent	Level 4 (Detailed Investigation)	Level 3 (Detailed Investigation)	Level 3 (Detailed Investigation)	Level 2 (Simplified Investigation)
	Injury/illness/scenario may happen occasionally (approximately once in 10 years)	P1 Occasional	Level 4 or 3 (Detailed Investigation)	Level 3 (Detailed Investigation)	Level 2 (Simplified Investigation)	Level 1 (Incident Dialogue)
	Injury/illness/scenario may happen rarely or almost happened within a plant lifetime (approximately once in 100 years)	P2 Rare	Level 3 (Detailed Investigation)	Level 3 (Detailed Investigation)	Level 1 (Incident Dialogue)	Level 1 (Incident Dialogue)
	Injury/illness/scenario is not anticipated, but thinkable under very unfavorable circumstances (approximately once in 1000 years)	P3 Very Rare	Level 3 (Detailed Investigation)	Level 2 (Simplified Investigation)	Level 1 (Incident Dialogue)	Level 1 (Incident Dialogue)
	Not a credible scenario, reasonably not to be expected (approximately less than once per 10000 years)	P4 Reasonably not to be expected	Level 1 (Incident Dialogue)	Level 1 (Incident Dialogue)	Level 1 (Incident Dialogue)	Level 1 (Incident Dialogue)

Table 2: Criteria for Incident Classification based on potential outcome of incident (severity & probability)

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Table 5.5-1: Examples of daily life incidents

Daily Life Incident	No Daily Life Incident
Stumble or fall while walking in a staircase accessible to all	Stumble or fall in the vertical ladders of a scaffold or a pipe bridge while performing maintenance
Slip in the shower of the changing room	Slip near an extruder because of granulate on the floor
Stumble while crossing the street	
Hand trapped when closing a car door	Stumble on a hose while discharging a tank truck wearing a chemical protection suit
While walking outdoors, employee gets a dust particle in an eye because of a wind gust	—
While grabbing a tool, employee is stung by a wasp that was in the toolbox	Hand trapped while stacking pipes in a carrier
While standing up in a company bus, employee hits his/her knee	By cleaning a machine, employee gets a catalyst dust particle in an eye
Cut while cutting a paper sheet with conventional scissors	While removing a honeycomb in an agriculture research lab, employee is stung by several bees
	While leaving a tower crane, operator falls three (3) meters and hurts his/her knee
	Cutting wrapping foil from a pallet

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Addendum 6 – Incident Reporting Requirements – Next Levels of Management

	Unit Management	EHS Representative	HR Partner	Potential Escalation
Injuries	X	X		X
Chemical Exposures	X	X		X
Fires	X	X		X
Events with High Severity (or Likely to be High)	X	X		X
Explosions/Implosions	X	X		X
Releases that exceed PSI or RQ threshold	X	X		X
Releases with potential to be a PSI or RQ	X	X		X
LsR Implementation Violations	X	X		X
Extreme or Willful Safety Violations	X	X		X
High Potential Near Misses	X	X		X
Off-Site Complaints	X	X	X	X
3rd Party Audits/Inspections		X		X
Events with Business Impact	X			X
Events with Potential to Cause Business Impact	X			X
Permit Deviations	X	X		X
Community Impact			X	X
Public Relations Issues			X	X

Note:

For these incidents, the AIM system does not fulfil the intent of notification. Confirmed communication (verbal or written with acknowledgement of receipt) of these incidents is required.

Notification does not mean that these individuals will conduct the incident investigation or takeover the responsibilities of the reporting the incident in AIM.

Unit Management and EHS Representative will determine if escalation to Site Director and/or EHS Manager is required.

In addition to these requirements, the site Contracted Services Manager shall be informed of any of these incidents that involve a contractor.

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Attachment 8 – Preliminary Investigation Information

Data to be Collected As Soon as Possible

1. Photographs (as needed to document location, surroundings, and contributing factors).
 - a. Adhere to phone/camera permitting and use guidelines
2. Witness Statement(s)
3. For Spills/Releases
 - a. Chemicals/materials released
 - b. Quantity of chemicals/materials released (verified by DCS, instrumentation, or best engineering judgment)
 - c. Estimated time duration for the release
 - d. If outside secondary containment estimated quantity that either has or could potentially be released from Site (CRITICAL FOR EPCRA & ENVIRONMENTAL REPORTING).
4. Mitigative measures taken to stop or manage the incident (i.e. first aid rendered, spills/released contained/disposed of, etc.).
5. Securing damaged equipment, instruments, tools, etc. in a safe, secure location for further investigative examination.
6. Identifying the sequence of events prior to, during, and after the incident (if possible).
7. Environmental Issues:
 - a. Any spills/releases with RQ designations? (IMMEDIATE Reporting needed; EHS&S can provide assistance)
 - b. Pressure Relief Device discharges to atmosphere. Did PRD monitoring alarm (if one exists for this PRD) activate? If so, measures taken to confirm an actual release from PRD and to cease any on-gong release