

HCB Stores Emergency Response Plan

BOMB THREAT

A Bomb threat is a notice received by any means, of any explosive device or bomb said to have been placed anywhere on Site. A bomb warning will not automatically lead to the declaration of an emergency but it may do so.

GENERAL POLICY

1. While most bomb threats are hoaxes, every one must be taken seriously.
2. The appropriate Production Manager (for plants) or Functional Manager will decide whether to call Police.
3. Unless there are clear reasons for evacuation of a building or plant area then normal activity should continue. This decision will be made by the Production Manager/Functional Manager concerned or his/her deputy
4. In all cases a careful search must be conducted, aiming to find a package or any object which is out of place or cannot be identified.
5. When directed by police, or if the evidence suggests the warning is genuine then an emergency will be declared and the appropriate area must be evacuated until at least 30 minutes after the bomb is due to explode or until the bomb is found and removed by the bomb disposal squad.
6. If a suspicious object is found **DO NOT TOUCH**. Clear people away from the vicinity, secure the area and advise the police of the location.

RECEIVING BOMB THREAT PHONE CALL

The call may be received by the switchboard, or after hours by any Control Room or No. 3 Gate. The receiver of the call should:

1. Show interest in the call
2. Keep the caller talking
3. Get as much information as possible about the location, timing, nature of the bomb. Information about the caller, reason for bomb, knowledge of plant should also be sought. Write down the wording of the threat and the time. Refer to Appendix I for the Bomb Threat Check List BOT176123164.

The person receiving the call should also try to assess the approximate age and sex of the caller, speech type eg. accented, intoxicated, rambling, irrational. What, if any, background noises.

Do not hang up the phone, even if the caller has.

COMMUNICATIONS AND PROCEDURES

Detailed Communications and procedures for dealing with bomb threats are set out in individual plant Emergency Procedure Manuals

DEFINITION OF AN EMERGENCY

An emergency is any hazardous or potentially hazardous situation where there is danger to personnel, property or the environment generally. It may also be described as a situation which cannot be immediately brought under control by staff on duty using available resources, where serious injury or death could be incurred, where property damage could occur or where serious environmental consequences could result.

Three levels of emergency are specified:

- (a) **LOCAL** alert for any situation which threatens life, property or the environment and cannot be contained by local resources. For example, a man collapsed in a confined space and/or a small fire.
- (b) **SITE** alert where other areas of the site or people, property or the environment outside the site may be affected. For example, contamination of town's water on site.
- (c) **EVACUATION** alert when *non-critical* personnel are required to leave an affected plant area and assemble in a safe location. For example, a serious bomb threat.

More information on the types of emergency which may occur are listed in Section 7 of BOT170759994 Types of Emergencies:

TYPES OF EMERGENCIES

The types of emergencies that can occur on Botany Site are extensive. Details are given in the individual Plant Emergency Procedures. An overview of the types of emergencies which may occur on the Site follows.

FIRE

Fire emergencies may occur in any part of the Botany Site. Hydrocarbon storage areas and plants processing hydrocarbons are obvious fire hazard locations. All the storage areas described below contain several tanks, thus a major aim in firefighting will always be to prevent fire spreading to more than one tank. All the areas are provided with appropriate fixed and portable firefighting appliances. There are also leak detection systems.

Should a fire occur, it will also be necessary to manage contaminated firewater runoff to minimise the off-site effects of such an incident.

HYDROCARBON STORAGE AREAS

Nant Street Tank Farm, Botany

This isolated storage area is located south of the railway line with road access from Nant St. Diesel, pyrolysis gasoline, avgas, unleaded petrol and naphtha stock varies from 10,000 - 50,000 tonnes. The area is mostly un-manned in normal working hours except when material transfers are in progress. At other times the storage area is monitored remotely from the Olefines Plant Control Room. Naphtha is a stand-by feedstock for the Olefines plant and any interruption to supply would have a severe effect on the productivity of the Botany Site. The floating roof tanks are protected by a fixed foam installation.

Flammable Liquid Tank Farm

Located near No. 3 Gate and Denison Street, this area includes storage spheres containing ethylene and C4's. There is also a tank containing propylene oxide. In the event of fire, water deluge systems automatically cool the exterior walls and supporting structures of adjacent vessels.

Pyrolysis Gasoline Storage

There are two floating roof tanks of crude petrol (pyrolysis gasoline). These tanks are located near the northern site boundary between 1st and 2nd Streets. The inventory in storage is 500 tonnes. The tanks are protected by a fixed foam installation.

Fuel Oil Storage

Two fuel oil storage tanks are located south west of the Olefines plant. These tanks are protected by foam deluge.

LPG Storage/Loading Bay

The storage tank area at the rear of the Olefines Plant contains a number of horizontal "bullets" and other tanks of LPG. Road tankers are loaded here which increases the risk of fire. The tanks and tankers are protected by water sprays.

Other Hydrocarbon Storage Areas

Specific fire hazards outside these storage areas include:

- * DEAC (diethyl aluminium chloride) storage area at the former Propathene plant.
- * *Methanol storage at Surfactants Plant*
- * Ethylene oxide storage in 8th Avenue at the rear of the Surfactants plant.
- * TEAL (triethyl aluminium) storage area with a fixed water fog spray system at the Alkatuff Plant.
- * Hydrogen gas holders at the Chlorine plant.
- * Butane and C4's storage at the Olefines plant.

Process Plants

The Surfactants, Alkathene, Alkatuff, and Olefine plants all process hydrocarbons and are possible sources of fire emergencies. Inventories are less than in the storage areas previously described, but due to the process and maintenance activities in these plants there is a risk of a fire emergency situation developing.

EXPLOSION

Major explosion hazards include the ethylene oxide and propylene oxide storage tanks, the ethylene sphere and the LPG loading bay/storage area.

Organic peroxides are explosion hazards if not stored correctly (cold storage required).

Emergencies may be initiated by an explosion within operating plant units or through leakage of flammable gas eg. (LPG liquefied petroleum gas) to the atmosphere or a BLEVE (boiling liquid expanding vapour explosion).

In such an emergency there may be events triggered by the original explosion which affect other plant or storage areas eg. damage to plant, fire or spillage, personnel injury, etc. Such events cannot be planned for in minute detail but emergency control staff must be aware of the possibility.

SPILLS

Spillage of significant quantities of any of the hazardous materials listed in Table 1 would immediately result in an emergency situation.

The effects of spillages vary widely and depend on the material involved.

Corrosive liquids such as caustic soda, sodium hypochlorite and hydrochloric acid create personnel hazards and possible environmental damage. Spillage of flammable liquids such as naphtha create fire and explosion hazards.

In the cases of corrosive and toxic materials a major concern is to ensure that all personnel dealing with the emergency are properly protected to prevent contact with these chemicals.

GAS LEAKS

Gas leaks of both flammable and toxic materials *could* occur on the Botany Site. All the materials stored in the LPG Storage/Loading Bay area and the Tank Farm *could* form flammable gas clouds if a serious leak occurs. Flammable gas clouds may also occur in other plant and storage facilities.

Chlorine and hydrogen chloride leaks form toxic gas clouds. These can occur in the Chlorine Plant. Specific procedures for dealing with each of these types of material leaks are included in the individual Plant Emergency Procedures.

Ethylene oxide is a flammable and toxic gas risk.

NATURAL EVENTS

No attempt is made in plant procedures or this plan to specifically deal with natural events such as flood, bush fire, earthquake, tidal wave or similar situations. General emergency procedures will be used to manage such events in the remote circumstance of their occurrence at the Botany Site.

IMPACT EVENTS

Road vehicles and aircraft do present a real possibility of impact with plant or storage facilities. Large road vehicles such as semi-trailers and tankers are constantly moving on internal site roads. Aircraft using the east/west runway approach Sydney Airport within 2 kilometres of the BIP. *Under certain weather conditions, the BIP is now directly under the landing approach path for helicopters using Sydney Airport. Airspace above the BIP is not "restricted".*

Emergency situations caused by impact of road vehicles or aircraft are likely to be similar to those emergency types described previously ie. fire, explosion, gas leak or spillage. Normal plant emergency procedures will be used, ensuring that all emergency services and BIP plants and staff are alerted immediately.

CIVIL DISTURBANCES

Demonstrations, riots and bomb threats may result in emergency situations. Specific procedures for dealing with bomb threats are given in Section 14. Bomb threats relating to individual plants are dealt within their Emergency Procedures.

Because civil disturbances such as public demonstrations may become violent and result in employee injury or property damage, it is important that Police be called immediately.

ENVIRONMENTAL INCIDENTS

Environmental incidents may occur on the Botany site. These include emissions to air, water or land. Of particular concern are incidents involving noise, odour and/or fallout across the site boundary which could have impact on residential and industrial neighbours.

Although some detection systems are in place, the diligence of site-based personnel is required to help identify potential problems. The plant in question may be busy tackling the problem and may fail to see the potential impact off-site. The control room should be notified of any problems. Site Safety or Site Security should be contacted if the source of the problem is unknown.

Such incidents rarely reach emergency proportions. However, the external community may perceive it to be a possible emergency and therefore it must be treated accordingly. This is now a condition of the EPA Licence for each BIP Company.

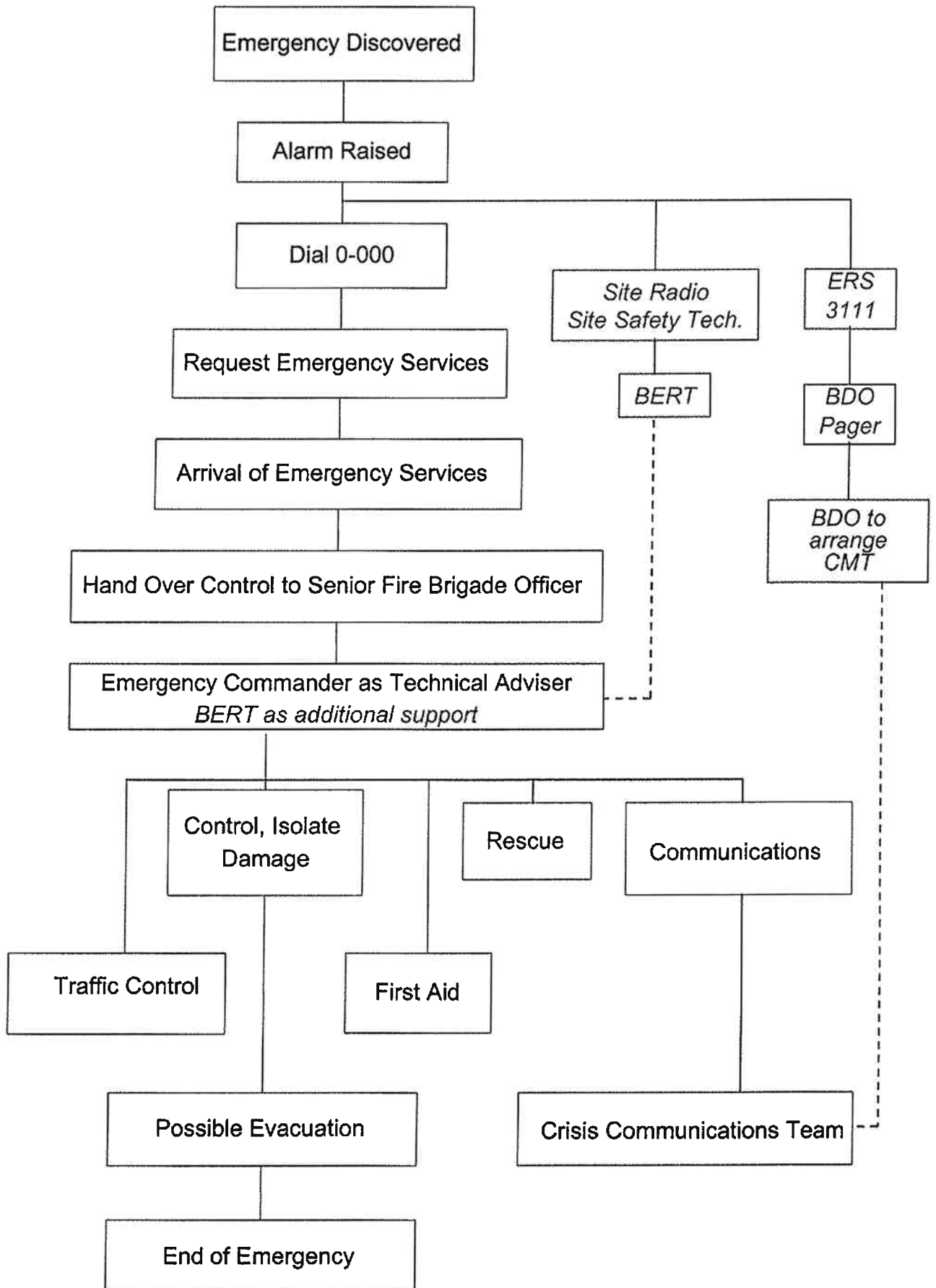
The Site and Plant Emergency Procedures cover these incidents.

Note: If there is any doubt as to whether any hazardous situation constitutes an emergency, **then it must be treated as an emergency.**

Emergencies may also be categorized on a scale which reflects an increasing degree of media interest, eg.:

- (a) Minor industrial disputation, bomb threats, minor accidents, contained spillages and other minor environmental incidents, minor fires etc.
- (b) Major gas emissions, on site loss of life or serious injury, plant threatening fires and explosions, major environmental incidents, community or trade union demonstrations etc.
- (c) Major disasters, eg. air crashes, incidents involving people trapped, on site violence, etc.

ERP - APP.C EMERGENCY ORGANISATION FLOW CHART



EMERGENCY COMMUNICATIONS

This communication procedure shall be used for all emergencies on Botany Site. The Company Emergency Commander shall ensure that the following steps are carried out.

Initial Communication

1. The person discovering the emergency shall immediately raise the local area alarm to alert everyone in the area of the emergency. This will also allow non-essential people to leave the affected area.
2. Contact shall then be made with any required Emergency Services - Fire Brigade, Police, Ambulance and/or Police Rescue. Only one call is required to 0-000. In the event of an external alert, all emergency services must be notified. *For those areas whose fire alarms automatically contact the Fire Brigade, no further call to that Service is required.*

The format of the emergency telephone report shall be:

- ♦ location (plant, suburb, street, nearest intersecting street to relevant site entry)
- ♦ type of emergency
- ♦ casualties
- ♦ assistance required
- ♦ hazards
- ♦ telephone contact number
- ♦ name

3. The Site Safety Technician shall be called on the Emergency Radio. The Site Safety Technician shall organise the Botany Emergency Response Team (BERT) and the Safety Response Vehicle (SRV).
4. The Company Emergency Commander shall appoint a Telephone Liaison Officer (TLO). The Company Emergency Commander shall keep the TLO regularly updated so that the TLO can keep others informed of progress throughout the emergency.
5. The TLO shall make an initial *notification by the emergency radio* (other control rooms on the Botany site and the Communications Centre) to warn others of the emergency. A response from the Communications Centre and the Site Utilities control room shall be requested to confirm that the message was successfully received and understood.
6. The TLO shall call the Emergency Response Service (ERS) on 3111 or 0-1 800 033 111. The TLO shall advise the ERS of the nature and the extent of the emergency. The TLO shall request the assistance of the *BIP Crisis Management Team (CMT)*. The ERS shall contact a member of the *CMT* and call the plant list. See Appendix H for details of the ERS; BOT176481153.
7. The Company Emergency Commander shall communicate directly with plant management and other resources he/she needs to control or combat the emergency. This shall include the NSW Fire Brigade who are the authorised lead combat agency for incidents of the type likely to occur on the Botany site.

Ongoing Communication

8. The Company Emergency Commander shall maintain ongoing communication with BERT, the Emergency Services and plant management.
9. The TLO shall be the key communications link between the Company Emergency Commander and the Communications Centre.
10. The Communications Centre shall relay information received to:
 - ♦ the *CMT* who are responsible for communication with:
 - ♦ statutory authorities;
 - ♦ the local council;
 - ♦ resident groups;
 - ♦ the Emergency Response Service (ERS);
 - ♦ the media;
 - ♦ *Corporate* Head Office (Directors, Legal, Insurance etc.)
 - ♦ neighbours; and
 - ♦ downstream parties.
 - ♦ the Occupational Health Centre who are responsible for communication with:
 - ♦ hospitals
 - ♦ the Emergency Police Coordinator who is responsible for communication with:
 - ♦ the neighbourhood.

Note: It is essential that a brief record be kept of all internal and external communications showing times, information transmitted and by whom. This duty must be delegated to the person handling the communications.

Refer to Appendix D for Emergency Communications Flowcharts BOT176475772.

COMMUNICATION SYSTEMS

All major plants are equipped with the communication devices listed below in their control rooms:

- (1) Telephone
- (2) Motorola radio for emergency use. These radios are a portable "walkie-talkie" type and intrinsically safe. They are also referred to as VH2AHN (previously Starphone). Spare units are available in the Communication Centre.

Some plants also have an internal public address system which may be used in an emergency to clear the operating area of contractors or visitors not involved in emergency control. Plants (or groups of plants) have internal radio systems for general operational communications

COMMAND CENTRE

In most instances the Command Centre for emergency control will be the local plant control room. Where this control room is unsuitable for any reason eg. it is threatened by the emergency situation, the Emergency Controller will choose an alternative location, fitted with telephones and Motorola radios. This may be another plant control room or the Site Communication Centre.

THE TELEPHONE SWITCHBOARD

The telephone system is a central part of emergency communications. The switchboard provides 32 incoming lines and a network of private lines giving external/internal access. Each production centre can be accessed on phone numbers listed in the directory. The lines can be interrupted at the switchboard if the situation requires.

The main *Orica* switchboard is *no longer* operated by receptionists, *but calls are diverted to another telephone* Monday to Friday, between 7am and 5pm. The main switchboard lines are switched at all other times and calls are received at No. 3 Gate.

To minimise communication difficulties during emergencies it is essential to:

1. Restrict use of telephone by personnel to essential emergency type calls.
2. Arrange to man the switchboard during emergencies.
3. Have *temporary* switchboard operators interrupt calls to production centres so lines are kept clear for emergency communication.

EMERGENCY RESPONSE AND CONTROL

COMPANY EMERGENCY COMMANDER

In the first instance of an emergency, the Team Leader of the plant involved will be the Emergency Commander. *During an emergency*, team Leaders wear an orange hat for easy identification. Where the Team Leader is incapacitated by the emergency incident a senior plant technician will don the orange hat and take over his/her role until relieved.

In the event of a situation escalating into a major emergency, the Team Leader may be assisted by the Safety Centre Technician. The Safety Centre Technician is identified by the yellow hat and overalls.

The responsibilities of the Emergency Commander during the initial period of any emergency will include the overseeing of:

- * incident and damage control (eg. fire fighting)
- * rescue and first aid
- * traffic control
- * *internal* communications
- * evacuation

The functions listed will be delegated to members of the shift team and BERT (Botany Emergency Response Team.)

For external communications, refer to BIP Crisis Communications Plan (BOT 164715171)

HAND OVER CONTROL

When the Fire Brigade units arrive on site, the Emergency Commander will hand over responsibility for directing emergency operations to the Senior Fire Brigade Officer, who then becomes the Chemical Incident Coordinator with overriding authority as the combat agency.

The handover briefing will include:-

- (a) location, nature & status of the emergency
- (b) details of personnel injured or trapped
- (c) action taken to date
- (d) location of all personnel involved
- (e) details of product(s) involved
- (f) Details of other known hazards
- (g) any other relevant information

The Emergency Commander will then continue to provide advice to the Chemical Incident Coordinator about the particular plant hazards, location of equipment, access to building, location of plant personnel etc. He/she will continue in this role unless relieved by a senior *Company* manager.

The **Chemical Incident Coordinator** (Senior Fire Brigade Officer on Site) takes charge of:

- Firefighting
- Spillage control
- Identification
- Containment
- Make safe
- Rescue
- Clean Up

The **Police Forward Commander** is in charge of:

- Control of access to the combat zone*
- External Traffic Control*
- Perimeter Control
- Evacuation (neighbours)
- Disaster victim registration/identification
- Investigation (Coronial/Criminal)
- Property Security
- Support to Fire Brigade
- Co-ordination

The **Ambulance Commander** is in charge of:

- Treating victims
- Rescue & Transport

An emergency organisation flow chart is given in Appendix C; BOT176466321.

Special Requirement:

In accordance with the Occupational Health and Safety Regulation 2001, where an accident or incident results in the death of a person, the scene must not be disturbed.

EVACUATION

When a Plant emergency alarm sounds, non-essential personnel are to evacuate to predefined assembly areas.

The Emergency Commander may decide to evacuate non-essential personnel to a safer area.

In the event of a major emergency which threatens the lives of employees, the Emergency Commander or the Incident Manager (the senior fire officer at the scene) may decide to evacuate the area affected by the emergency. Where more than one plant is affected the Emergency Commander will advise the Crisis Communications Team of his/her decision to evacuate and the Crisis Coordinator will decide whether to evacuate the other plants.

Where it is safe to do so, plants will be shut down, hazardous materials isolated and made safe, before evacuating. Personnel will be directed to evacuate by the shortest, safest route. The evacuation route should avoid toxic or flammable gas clouds, chemical spillages, electrical wires or similar hazards. (Wherever possible personnel will move at a fast walking pace cross wind to avoid panic and confusion.)

The Plant Emergency Plans nominate assembly areas for evacuation.

EXTERNAL EVACUATION

Where an emergency may affect people who live near the site, it may be necessary to arrange their evacuation. Such evacuation will be the responsibility of the NSW Police.

Generic Principles for Handling Emergencies

Specific examples of the types of emergencies which may occur at the HCB Stores, and the generic principles for handling such emergencies, are listed below.

Fire

Fire in the HCB Store may be caused by:

- grass fires outside the HCB Store
- an electrical fault within the HCB Store

Although HCB is not considered to be a significant fire risk it will burn if involved in a fire. On burning it will emit toxic fumes of chlorides. The heat from a major fire could cause the dispersion of HCB to the environment. Dust may sublime and, as the fumes cool, re-condense over a large area. Contaminated firewater could also make its way into the Springvale Drain in the case of a major fire in the HCB Store.

The Hazchem code for material in the HCB Store indicates that the equipment suitable for fire fighting and where appropriate, for dispersing spillage of dangerous goods, is either water jets or water fog. However, based on the physical and chemical properties of the material in the HCB Store and the following environmental considerations, the use of water for fire fighting and spillage dispersal should be avoided if possible:

- there is only minimal firewater retention capacity in the HCB Store. Consequently, contaminated firewater would quickly enter the Springvale Drain
- there are no opportunities available for isolating the Springvale Drain

To reduce the possibility of contaminated firewater entering the Springvale drain, firefighting should use dry powder, which is to be recovered and stored in the HCB Store as Scheduled Waste. However the use of this type of medium may only be appropriate in preventing small fires becoming large.

The HCB Store is protected by fire hydrants and the fire fighting equipment provided by the Safety Response Vehicle, Botany Emergency Response Team and the NSW Fire Brigade.

Fire water is retained in some sections of the HCB Store.

Spills

Spill management within the HCB Store is detailed in the Botany Chlorine HCB Store Procedure, "Emergency Containment and Cleanup of a Release" - BTC187979752 .

Natural events

No attempt is made in this plan to specifically deal with natural events such as flood, fire, earthquake, tidal wave or similar situations. General emergency procedures will be used to manage such events in the remote circumstance of their occurrence at the Botany site.

Impact events

Aircraft do present a real possibility of impact with storage facilities. Aircraft using the east/west runway, approach Sydney airport within 2 kilometres of the Botany site.

Emergency situations caused by impact of aircraft are likely to be similar to those emergencies described previously, i.e. fire and spillage. Normal plant emergency procedures will be used, ensuring that all emergency services and Botany site plants and staff are alerted immediately.

Road vehicles do not present a significant risk of impact as the roads surrounding the HCB Store are not normally accessed by large road vehicles.

Civil disturbances

Demonstrations, riots and bomb threats may result in emergency situations. Specific procedures for dealing with bomb threats are given in Chlorine Plant Emergency Response Plan, "Bomb Threat" - BTC147704016 .

Civil disturbances such as public demonstrations may become violent and result in employee injury or property damage, it is important that the Police be called immediately.

Secondary events

A fire or explosion on the nearby Alkatuff and Alkathene plants could cause an HCB Store emergency. Building separation distances have minimised risk should such an event occur.

Glossary

- HCB Store The HCB Store refers to the collection of buildings (A,B ,C,D,E,F,G,H) that are located on the Botany site at
A,B,C at corner of 12 th Ave and 1st St
D,F on the eastern end of 7th Ave
E on the corner of 2nd St and 8th Ave
G,H on 5th St near 10th Ave
The buildings are not manned and were constructed to house a mixture of chlorinated hydrocarbons, mainly HCB.
- HCB Hexachlorobenzene
- HCBD Hexachlorobutadiene
- OCS Octachlorostyrene
- HCE Hexachloroethane
- PCE Perchlorethylene
- EDC Ethylene Dichloride

Additional Glossary and Abbreviations are listed in the Botany Site Emergency Response Plan, "Glossary & Abbreviations" - BOT170507652

Hazardous Materials

The material stored in the HCB Store A is a mixture of chlorinated hydrocarbons. A typical composition would be:

Hexachlorobenzene (HCB)	80%
Hexachlorobutadiene (HCBD)	10%
Perchlorethylene (PCE)	5%
Hexachloroethane (HCE)	3%
Octachlorostyrene (OCS)	2%

With this composition the mixture is a solid powder. However, some of the material has a higher proportion of HCBD, and is a slurry form.

The material stored in HCB Stores B ,C and Store D is HCB crystals.HCB Stores F,G and H contain Vinyls legacy waste which is EDC tars waste, lights polymer and EDC sludges. The material in Store H is considered flammable. HCB Store E consists of six tanks approx 100m3 each, containing approx 1650 drums equivalent of contaminated rubble and soil from the Solvents demolition and new Chlorine Plant construction.

HCB is classified as a Class 6.1 poison. HCB is not considered to be a significant fire risk but will burn if involved in a fire. On burning it will emit toxic fumes of chlorides. The remaining components of the HCB waste are not likely to have a major effect, since they make up a minor portion of the total material and have similar properties to HCB.

A total of over 10,600 tonnes is kept in the HCB Stores in 200 litre plastic lined steel drums (around 62,000 drums equivalent). The drums are stored on timber pallets, stacked up to 4 levels high. Broken up discarded pallets and crushed drums are kept in closed containers inside a separate shed as they are considered to be potentially contaminated material. The material in Store H is held in concrete tanks of about 3000 drums equivalent.

The Hazchem code and MSDS number for the materials that are handled at the HCB Store and which may be of concern in an emergency are listed in Table 1. Material Safety Data Sheets (MSDS) containing details of these hazardous materials are held on file.

A complete set of MSDS is also available on the company's mainframe computer system.

Further information and advice can be obtained through the Orica Emergency Response Service on 1800-033-111 or internal extension 3111.

Table 1: HCB Store - Hazardous material

DESCRIPTION	HAZCHEM CODE	MSDS UN NUMBER
Hexachlorobenzene	1(Z)	2729
Hexachlorobutadiene	2X	2279
Hexachloroethane	Not available	Not available
Perchloroethylene	2(Z)	1897
Octachlorostyrene	Not available	Not available
Tars Waste	2XE	2928
Lights Polymer	2Y	2811
EDC Sludge	2X	1760

INTERACTION WITH EMERGENCY SERVICES

It is essential that complete co-operation is achieved between emergency services such as Fire Brigade, Police and Ambulance and the personnel managing any emergency.

This Emergency Response Plan requires that emergency services be called to the site immediately. **After arrival of the Fire Brigade, the Emergency Commander hands over control to the senior Fire Brigade officer.** The Emergency Commander then maintains a close liaison, providing advice and directing *plant* personnel as required.

Road access to the site via No. 3 Gate must be maintained so that large emergency service vehicles have easy entry. Where No. 3 Gate is not accessible because the emergency affects 10th Ave, eg. a tank farm emergency, then Gates No. 1, 2, 4, 5 and 6 will be made available for emergency vehicles (*as appropriate*).

Technical and general advice about chemical/toxic/fire hazards must be given. Material safety data sheet information will be made available to the Emergency Services.

The current procedures which set out the responsibility and obligations of the various Emergency Services are set out in the *Botany Bay Local Disaster Plan*.

These procedures establish the Senior Fire Brigade Officer at the scene, as the Chemical Incident Coordinator. In his/her absence the Senior Police Officer will fulfill his/her role.

The interaction of the various Emergency Services is summarised in chart form in *Appendix C BOT 176466321*.