

Section 1. Registration Information

Source Identification

Facility Name:	TPC Group- Port Neches Operations
Parent Company #1 Name:	
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	Revised PHA / Hazard Review due to process change (40 CFR 68.190(b)(5))
Description:	Port Neches Operations
Receipt Date:	10-Dec-2020
Postmark Date:	10-Dec-2020
Next Due Date:	10-Dec-2025
Completeness Check Date:	10-Dec-2020
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0011 5314
Other EPA Systems Facility ID:	77651TXSPT212SP
Facility Registry System ID:	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	102647005
Parent Company #1 DUNS:	
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	2102 SPUR 136
Street 2:	
City:	PORT NECHES
State:	TEXAS
ZIP:	77651
ZIP4:	
County:	JEFFERSON

Facility Latitude and Longitude

Latitude (decimal):	29.978056
Longitude (decimal):	-093.939167
Lat/Long Method:	Interpolation - Photo
Lat/Long Description:	Plant Entrance (General)
Horizontal Accuracy Measure:	25
Horizontal Reference Datum Name:	North American Datum of 1983

Source Map Scale Number:

24000

Owner or Operator

Operator Name:

Texas Petrochemicals, LLC

Operator Phone:

(409) 724-4900

Mailing Address

Operator Street 1:

2102 SPUR 136

Operator Street 2:

Operator City:

PORT NECHES

Operator State:

TEXAS

Operator ZIP:

77651

Operator ZIP4:

Operator Foreign State or Province:

Operator Foreign ZIP:

Operator Foreign Country:

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:

RMP Title of Person or Position:

Plant Manager

RMP E-mail Address:

Emergency Contact

Emergency Contact Name:

Christina Clifton

Emergency Contact Title:

EHSS Manager

Emergency Contact Phone:

(409) 724-4999

Emergency Contact 24-Hour Phone:

(409) 724-4700

Emergency Contact Ext. or PIN:

Emergency Contact E-mail Address:

christina.clifton@tpcgrp.com

Other Points of Contact

Facility or Parent Company E-mail Address:

Facility Public Contact Phone:

Facility or Parent Company WWW Homepage

Address:

Local Emergency Planning Committee

LEPC:

Jefferson County LEPC

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:

92

FTE Claimed as CBI:

Covered By

OSHA PSM :

Yes

EPCRA 302 :

Yes

CAA Title V:	Yes
Air Operating Permit ID:	0-01327

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	30-Jun-2020
Last Safety Inspection Performed By an External Agency:	US Coast Guard

Predictive Filing

Did this RMP involve predictive filing?:	Yes
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Preparer Information

Preparer Name:
Preparer Phone:
Preparer Street 1:
Preparer Street 2:
Preparer City:
Preparer State:
Preparer ZIP:
Preparer ZIP4:
Preparer Foreign State:
Preparer Foreign Country:
Preparer Foreign ZIP:

Confidential Business Information (CBI)

CBI Claimed:
Substantiation Provided:
Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents:	See Section 6. Accident History below to determine if there were any accidents reported for this RMP.
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Process Chemicals

Process ID:	1000113430
Description:	C4 Terminal
Process Chemical ID:	1000141712
Program Level:	Program Level 3 process
Chemical Name:	Flammable Mixture
CAS Number:	00-11-11
Quantity (lbs):	120000000
CBI Claimed:	
Flammable/Toxic:	Flammable

Flammable Mixture Chemical Components

Flammable Mixture Chemical ID: 1000125265
Chemical Name: Isopentane [Butane, 2-methyl-]
CAS Number: 78-78-4
Flammable/Toxic: Flammable

Flammable Mixture Chemical ID: 1000125266
Chemical Name: Pentane
CAS Number: 109-66-0
Flammable/Toxic: Flammable

Flammable Mixture Chemical ID: 1000125267
Chemical Name: Propane
CAS Number: 74-98-6
Flammable/Toxic: Flammable

Flammable Mixture Chemical ID: 1000125268
Chemical Name: Propylene [1-Propene]
CAS Number: 115-07-1
Flammable/Toxic: Flammable

Flammable Mixture Chemical ID: 1000125269
Chemical Name: Vinyl acetylene [1-Buten-3-yne]
CAS Number: 689-97-4
Flammable/Toxic: Flammable

Flammable Mixture Chemical ID: 1000125270
Chemical Name: Propyne [1-Propyne]
CAS Number: 74-99-7
Flammable/Toxic: Flammable

Flammable Mixture Chemical ID: 1000125271
Chemical Name: Ethane
CAS Number: 74-84-0
Flammable/Toxic: Flammable

Flammable Mixture Chemical ID: 1000125272
Chemical Name: 2-Butene-cis
CAS Number: 590-18-1
Flammable/Toxic: Flammable

Flammable Mixture Chemical ID: 1000125273
Chemical Name: Hydrogen
CAS Number: 1333-74-0
Flammable/Toxic: Flammable

Flammable Mixture Chemical ID: 1000125274
Chemical Name: Methane
CAS Number: 74-82-8
Flammable/Toxic: Flammable

Flammable Mixture Chemical ID: 1000125275
Chemical Name: 2-Methyl-1-butene
CAS Number: 563-46-2
Flammable/Toxic: Flammable

Flammable Mixture Chemical ID:	1000125276
Chemical Name:	3-Methyl-1-butene
CAS Number:	563-45-1
Flammable/Toxic:	Flammable
Flammable Mixture Chemical ID:	1000125277
Chemical Name:	Methyl ether [Methane, oxybis-]
CAS Number:	115-10-6
Flammable/Toxic:	Flammable
Flammable Mixture Chemical ID:	1000125278
Chemical Name:	2-Methylpropene [1-Propene, 2-methyl-]
CAS Number:	115-11-7
Flammable/Toxic:	Flammable
Flammable Mixture Chemical ID:	1000125279
Chemical Name:	1,3-Butadiene
CAS Number:	106-99-0
Flammable/Toxic:	Flammable
Flammable Mixture Chemical ID:	1000125280
Chemical Name:	1-Butene
CAS Number:	106-98-9
Flammable/Toxic:	Flammable
Flammable Mixture Chemical ID:	1000125281
Chemical Name:	2-Butene-trans [2-Butene, (E)]
CAS Number:	624-64-6
Flammable/Toxic:	Flammable
Flammable Mixture Chemical ID:	1000125282
Chemical Name:	Butane
CAS Number:	106-97-8
Flammable/Toxic:	Flammable
Flammable Mixture Chemical ID:	1000125283
Chemical Name:	Ethyl acetylene [1-Butyne]
CAS Number:	107-00-6
Flammable/Toxic:	Flammable
Flammable Mixture Chemical ID:	1000125284
Chemical Name:	Isobutane [Propane, 2-methyl]
CAS Number:	75-28-5
Flammable/Toxic:	Flammable

Process NAICS

Process ID:	1000113430
Process NAICS ID:	1000114803
Program Level:	Program Level 3 process
NAICS Code:	42471
NAICS Description:	Petroleum Bulk Stations and Terminals

Section 2. Toxics: Worst Case

No records found.

Section 3. Toxics: Alternative Release

No records found.

Section 4. Flammables: Worst Case

Flammable Worst ID: 1000069100

Model Used:

Endpoint used:

EPA's RMP*Comp(TM)

1 PSI

Passive Mitigation Considered

Blast Walls:

Other Type:

Section 5. Flammables: Alternative Release

Flammable Alter ID: 1000064616

Model Used:	EPA's RMP*Comp(TM)
Passive Mitigation Considered	
Dikes:	Yes
Fire Walls:	
Blast Walls:	
Enclosures:	
Other Type:	
Active Mitigation Considered	
Sprinkler System:	
Deluge System:	Yes
Water Curtain:	
Excess Flow Valve:	
Other Type:	

Section 6. Accident History

Accident History ID: 1000070597

Date of Accident:	27-Nov-2019
Time Accident Began (HH:MM):	01:00
NAICS Code of Process Involved:	32511
NAICS Description:	Petrochemical Manufacturing
Release Duration:	999 Hours 13 Minutes

Release Event

Gas Release:	Yes
Liquid Spill/Evaporation:	
Fire:	Yes
Explosion:	Yes
Uncontrolled/Runaway Reaction:	

Release Source

Storage Vessel:	Yes
Piping:	Yes
Process Vessel:	Yes
Transfer Hose:	
Valve:	Yes
Pump:	Yes
Joint:	Yes
Other Release Source:	

Weather Conditions at the Time of Event

Wind Speed:	6.0
Units:	miles/h
Direction:	SSW
Temperature:	74
Atmospheric Stability Class:	E
Precipitation Present:	
Unknown Weather Conditions:	

On-Site Impacts

Employee or Contractor Deaths:	0
Public Responder Deaths:	0
Public Deaths:	0
Employee or Contractor Injuries:	3
Public Responder Injuries:	0
Public Injuries:	0
On-Site Property Damage (\$):	450000000

Known Off-Site Impacts

Deaths:	0
Hospitalization:	0
Other Medical Treatments:	0
Evacuated:	50000

Sheltered-in-Place:	13000
Off-Site Property Damage (\$):	153000000

Environmental Damage

Fish or Animal Kills:	Yes
Tree, Lawn, Shrub, or Crop Damage:	
Water Contamination:	Yes
Soil Contamination:	Yes
Other Environmental Damage:	

Initiating Event

Initiating Event:	Equipment Failure
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Contributing Factors

Equipment Failure:	Yes
Human Error:	
Improper Procedures:	
Overpressurization:	
Upset Condition:	
By-Pass Condition:	
Maintenance Activity/Inactivity:	
Process Design Failure:	
Unsuitable Equipment:	
Unusual Weather Condition:	
Management Error:	
Other Contributing Factor:	Reaction in a dead-leg section of line.

Off-Site Responders Notified

Off-Site Responders Notified:	Notified and Responded
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Changes Introduced as a Result of the Accident

Improved or Upgraded Equipment:	Yes
Revised Maintenance:	Yes
Revised Training:	Yes
Revised Operating Procedures:	Yes
New Process Controls:	
New Mitigation Systems:	
Revised Emergency Response Plan:	
Changed Process:	Yes
Reduced Inventory:	Yes
None:	
Other Changes Introduced:	No longer operating impacted processing units. Will operate as a terminal facility.

Confidential Business Information

CBI Claimed:

Chemicals in Accident History

Accident Chemical ID:	1000056974
Quantity Released (lbs):	11337920
Percent Weight:	
Chemical Name:	Flammable Mixture
CAS Number:	00-11-11
Flammable/Toxic:	Flammable

Flammable Mixture Chemical Components in Accident History

Accident Chemical Flammable Mixture ID:	1000009121
Chemical Name:	1,3-Butadiene
Flammable/Toxic:	Flammable
Accident Chemical Flammable Mixture ID:	1000009122
Chemical Name:	1-Butene
Flammable/Toxic:	Flammable
Accident Chemical Flammable Mixture ID:	1000009123
Chemical Name:	2-Butene-cis
Flammable/Toxic:	Flammable
Accident Chemical Flammable Mixture ID:	1000009124
Chemical Name:	2-Butene-trans [2-Butene, (E)]
Flammable/Toxic:	Flammable
Accident Chemical Flammable Mixture ID:	1000009125
Chemical Name:	2-Methyl-1-butene
Flammable/Toxic:	Flammable
Accident Chemical Flammable Mixture ID:	1000009126
Chemical Name:	3-Methyl-1-butene
Flammable/Toxic:	Flammable
Accident Chemical Flammable Mixture ID:	1000009127
Chemical Name:	Butane
Flammable/Toxic:	Flammable
Accident Chemical Flammable Mixture ID:	1000009128
Chemical Name:	Ethane
Flammable/Toxic:	Flammable
Accident Chemical Flammable Mixture ID:	1000009129
Chemical Name:	Hydrogen
Flammable/Toxic:	Flammable
Accident Chemical Flammable Mixture ID:	1000009130
Chemical Name:	Ethyl acetylene [1-Butyne]
Flammable/Toxic:	Flammable
Accident Chemical Flammable Mixture ID:	1000009131
Chemical Name:	Isobutane [Propane, 2-methyl]
Flammable/Toxic:	Flammable
Accident Chemical Flammable Mixture ID:	1000009132
Chemical Name:	Isopentane [Butane, 2-methyl-]

Flammable/Toxic:	Flammable
Accident Chemical Flammable Mixture ID:	1000009133
Chemical Name:	Methane
Flammable/Toxic:	Flammable
Accident Chemical Flammable Mixture ID:	1000009134
Chemical Name:	Methyl ether [Methane, oxybis-]
Flammable/Toxic:	Flammable
Accident Chemical Flammable Mixture ID:	1000009135
Chemical Name:	2-Methylpropene [1-Propene, 2-methyl-]
Flammable/Toxic:	Flammable
Accident Chemical Flammable Mixture ID:	1000009136
Chemical Name:	Pentane
Flammable/Toxic:	Flammable
Accident Chemical Flammable Mixture ID:	1000009137
Chemical Name:	Propane
Flammable/Toxic:	Flammable
Accident Chemical Flammable Mixture ID:	1000009138
Chemical Name:	Propylene [1-Propene]
Flammable/Toxic:	Flammable
Accident Chemical Flammable Mixture ID:	1000009139
Chemical Name:	Propyne [1-Propyne]
Flammable/Toxic:	Flammable
Accident Chemical Flammable Mixture ID:	1000009140
Chemical Name:	Vinyl acetylene [1-Buten-3-yne]
Flammable/Toxic:	Flammable

Section 7. Program Level 3

Description

Process operations, aside from terminal activities have been suspended following the November 27, 2019 event. The Receiving, Storage and Transfer Operations will operated as a Terminal. Operation of the other units has been suspended.

The Butadiene Process is made up of five units as well as a Receiving, Storage, and Transfer (RS&T) process area. The Acetylene Hydrogenation Unit (AHU) removes acetylenes from the crude butadiene feed, the Butadiene Purification Unit purifies butadiene products and byproducts, the Sponge Oil Unit recovers C4s from the Vent Gas System and depentanizer bottoms streams, the Flare and Vent Gas Systems collect off-gas for recovery and/or combustion in an elevated flare, and the Waste Water Stripper Unit removes process chemicals from the process water. Several HAZOPs were conducted in order to cover all of the equipment in this process. The process controls, mitigation, monitors and detection systems noted in the PHA section apply to all units except as follows: Interlocks are used in the Butadiene Purification Unit, the AHU, the Flare and Vent Gas Systems, and the W3F54 Wastewater Stripper. Automatic shut-offs are in the AHU, Butadiene Purification Unit, and Flare and Vent Gas Systems. The deluge system is only used on all pumps and accumulators in the BD portion of the process and on the accumulator in the vent recovery system. The Receiving, Storage and Transfer (RS&T) process area includes the tankage, loading and unloading of all C4 Plant feed chemicals, intermediates and products including two docks for loading and unloading from barges and ships. This area also includes storage of finished product for the O&O Plant F5 Unit.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000120819
Chemical Name:	Flammable Mixture
Flammable/Toxic:	Flammable
CAS Number:	00-11-11
Process ID:	1000113430
Description:	C4 Terminal
Prevention Program Level 3 ID:	1000096875
NAICS Code:	42471

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	05-Feb-2018
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Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	24-Sep-2020
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The Technique Used

What If:	
Checklist:	
What If/Checklist:	
HAZOP:	Yes
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	

PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):

Major Hazards Identified

Toxic Release:	
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	Yes
Polymerization:	Yes
Overpressurization:	Yes
Corrosion:	
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	
Floods (Flood Plain):	
Tornado:	
Hurricanes:	
Other Major Hazard Identified:	

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	Yes
Flares:	Yes
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	Yes
Emergency Power:	Yes
Backup Pump:	Yes
Grounding Equipment:	Yes
Inhibitor Addition:	Yes
Rupture Disks:	Yes
Excess Flow Device:	
Quench System:	
Purge System:	Yes
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	Yes
Fire Walls:	
Blast Walls:	
Deluge System:	Yes
Water Curtain:	
Enclosure:	

Neutralization:

None:

Other Mitigation System in Use:

Monitoring/Detection Systems in Use

Process Area Detectors: Yes

Perimeter Monitors: Yes

None:

Other Monitoring/Detection System in Use:

Changes Since Last PHA Update

Reduction in Chemical Inventory:

Increase in Chemical Inventory:

Change Process Parameters:

Installation of Process Controls:

Installation of Process Detection Systems:

Installation of Perimeter Monitoring Systems:

Installation of Mitigation Systems:

None Recommended: Yes

None:

Other Changes Since Last PHA or PHA Update:

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures): 30-Sep-2020

Training

Training Revision Date (The date of the most recent review or revision of training programs): 13-Aug-2020

The Type of Training Provided

Classroom: Yes

On the Job: Yes

Other Training:

The Type of Competency Testing Used

Written Tests: Yes

Oral Tests:

Demonstration:

Observation: Yes

Other Type of Competency Testing Used:

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures): 20-Jul-2020

Equipment Inspection Date (The date of the most recent equipment inspection or test): 06-Oct-2020

Equipment Tested (Equipment most recently inspected or tested): Tank 109

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures): 05-Oct-2020

Change Management Revision Date (The date of the most recent review or revision of management of change procedures): 01-Sep-2020

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review): 30-Sep-2020

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit): 12-Apr-2018

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit): 12-Apr-2021

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)): 11-Oct-2020

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation): 30-Jun-2021

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans): 16-Aug-2018

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures): 06-Oct-2020

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures): 01-Sep-2020

Contractor Safety Performance Evaluation Date 26-Oct-2020
(The date of the most recent review or revision of
contractor safety performance):

Confidential Business Information

CBI Claimed:

Section 8. Program Level 2

No records found.

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?): Yes

Facility Plan (Does facility have its own written emergency response plan?): Yes

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?): Yes

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?): Yes

Healthcare (Does facility's ER plan include information on emergency health care?): Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan): 21-Jul-2020

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees): 14-Jul-2020

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated): PORT NECHES FIRE DEPARTMENT

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated): (409) 722-5885

Subject to

OSHA Regulations at 29 CFR 1910.38: Yes

OSHA Regulations at 29 CFR 1910.120: Yes

Clean Water Regulations at 40 CFR 112: Yes

RCRA Regulations at CFR 264, 265, and 279.52: Yes

OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254: Yes

State EPCRA Rules or Laws: Yes

Other (Specify):

Executive Summary

TPC Group, LLC - Port Neches Operations (PNO) EXECUTIVE SUMMARY

1. Accidental release prevention and emergency response policies. The TPC Group Port Neches Operations (PNO Plant) is subject to the requirements of 40 Code of Federal Regulations (CFR) Part 68 - Chemical Accident Prevention Provisions. As a result, the PNO Plant maintains an EPA Risk Management Program (RMP) and OSHA Process Safety Management (PSM) program under 29 CFR Part 1910 that focus on preventing the release of regulated substances and highly hazardous chemicals, and mitigating the consequences of any releases that occur.

The PNO Plant is committed to providing a safe, healthy and environmentally conscious workplace for its associates and neighbors. The PNO Plant participates with the Jefferson County Local Emergency Planning Commission (LEPC) Sabine-Neches Chiefs Association and the Port Neches Fire Department in assisting local officials in the development of emergency response plans and participates in cooperative training with them. TPC Group participates in the Responsible Care initiative and is committed to the responsible management of chemicals. The PNO Plant Manager, or his designee, is responsible for implementation of the RMP.

2. The stationary source and regulated substances handled. The PNO Plant is located at the corner of Highway 136 and Highway 366 in Port Neches, Texas. The site began production in 1943 and was acquired by Huntsman in 1994 then TPC Group, LLC in 2007. The PNO Plant serves as a storage facility and terminal for volumes of Butadiene, Crude C4, and Raffinate. Butadiene is a PSM and RMP regulated substance, and is a monomer used in the production of butadiene rubber and various butadiene co-polymers.

3. General accidental release prevention program and chemical specific prevention steps.

The PNO Plant developed and implements an RMP/PSM program appropriate to the complexities of its process - a storage and terminal facility for 1,3-butadiene. While all elements contained in the RMP/PSM elements are important, key elements in our prevention efforts include process hazard analyses (PHA), mechanical integrity, and management of change.

PHAs are an exercise in which a team of subject matter experts identify and evaluate process hazards, and then make recommendations to control identified hazards. Mechanical integrity is the combination of inspections, testing, and preventive maintenance that is designed to prevent mechanical failures. Management of Change is a rigorous process for reviewing the safety implications of any covered change proposed to the facility. These key elements are supported by the remaining RMP/PSM elements, such as process safety information, operating procedures, training, to provide a comprehensive prevention program.

4. 5 Year Accident History. The PNO Plant has had one accident, an explosion in November 2019 when the PNO Plant was processing butadiene, that meets the EPA criteria for the five-year accident history. Since that time, TPC has discontinued processing butadiene. However, the site continues to serve as a terminal for Crude C4, Raffinate and Butadiene.

5. Emergency Response Program. TPC Group has a written emergency response program which encompasses the PNO Plant and contains procedures to be followed in the case of an accidental release of a hazardous chemical. These procedures include steps for informing the public, proper first aid and medical treatment, the proper use of emergency equipment and emergency response training for emergency response employees who perform emergency response duties and local emergency responders who may be called to assist in emergency response. The emergency response plan is reviewed annually and updated as necessary. Likewise, the emergency response equipment is maintained, tested and inspected periodically. TPC Group is actively involved with informing local officials about hazardous substances stored and processed on site. TPC Group participates with the Jefferson County LEPC and the Port Neches Fire Department in assisting local officials in the development of emergency procedures to identify resources, chemicals, contacts and material safety data sheets for participating companies. The Safety Manager is the person to contact in the event of an emergency. The Emergency Response Coordinator for the plant is the designated alternate contact. Initial response will be provided by TPC Group on-site fire department.

6. Planned changes to improve safety. The PNO Plant continues to upgrade fire water monitors and adding emergency block valves at various locations throughout the plant. There is an ongoing commitment to implement changes, when identified through HAZOP studies, employee suggestions, incident investigations, and other continuous improvement efforts that will improve the safety and protection of associates and neighbors from accidental releases of hazardous chemicals.