Section 1. Registration Information

Source Identification

Facility Name:	Intercontinental Terminals Company, LLC
Parent Company #1 Name:	
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	Regulated substance present above TQ in new (or previously not covered) process (40 CFR 68.190(b)(4))
Description:	
Receipt Date:	12-Feb-2014
Postmark Date:	12-Feb-2014
Next Due Date:	12-Feb-2019
Completeness Check Date:	12-Feb-2014
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 0009 3971
Other EPA Systems Facility ID:	
Facility Registry System ID:	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	67280073
Parent Company #1 DUNS:	
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	1943 Independence Pkwy.
Street 2:	
City:	La Porte
State:	TEXAS
ZIP:	77571
ZIP4:	
County:	HARRIS

Facility Latitude and Longitude

Latitude (decimal):	29.743333
Longitude (decimal):	-095.100278
Lat/Long Method:	Classical Surveying Techniques
Lat/Long Description:	Center of Facility
Horizontal Accuracy Measure:	1056.5

Horizontal Reference Datum Name:	North American Datum of 1983
Source Map Scale Number:	

Owner or Operator

Operator Name:	Intercontinental Terminals Company
Operator Phone:	(281) 884-0300

Mailing Address

Operator Street 1:	P.O. Box 698
Operator Street 2:	1943 Independence Pkwy.
Operator City:	Deer Park
Operator State:	TEXAS
Operator ZIP:	77536
Operator ZIP4:	0698
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:	Carl Holley
RMP Title of Person or Position:	VP of SHES and Regulatory Comp.
RMP E-mail Address:	cholley@iterm.com

Emergency Contact

Emergency Contact Name:	Carl Holley
Emergency Contact Title:	VP of SHES and Regulatory Comp
Emergency Contact Phone:	(281) 884-0350
Emergency Contact 24-Hour Phone:	(281) 380-1012
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	cholley@iterm.com

Other Points of Contact

Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	
Facility or Parent Company WWW Homepage Address:	www.iterm.com

Local Emergency Planning Committee

LEPC:	Harris County-Deer Park Area L

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	227
FTE Claimed as CBI:	

Covered By

OSHA PSM :	Yes

EPCRA 302 :	Yes
CAA Title V:	Yes
Air Operating Permit ID:	0-01061

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	15-Dec-2008
Last Safety Inspection Performed By an External Agency:	OSHA

Predictive Filing

Did this RMP involve predictive filing?:

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.

Process Chemicals

Process ID:	1000047657
Description:	Ref BD 25's Spheres
Process Chemical ID:	1000057918
Program Level:	Program Level 3 process
Chemical Name:	1,3-Butadiene
CAS Number:	106-99-0
Quantity (lbs):	15360303
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000047676
Description:	VAM 30
Process Chemical ID:	1000057941
Program Level:	Program Level 3 process
Chemical Name:	Vinyl acetate monomer [Acetic acid ethenyl ester]
CAS Number:	108-05-4
Quantity (lbs):	9108788
CBI Claimed:	
Flammable/Toxic:	Toxic

Process ID:	1000047663
Description:	Raffinate 31's
Process Chemical ID:	1000057924
Program Level:	Program Level 3 process
Chemical Name:	1-Butene
CAS Number:	106-98-9
Quantity (lbs):	11964956
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000047661
Description:	VAM 12's
Process Chemical ID:	1000057922
Program Level:	Program Level 3 process
Chemical Name:	Vinyl acetate monomer [Acetic acid ethenyl ester]
CAS Number:	108-05-4
Quantity (lbs):	18441320
CBI Claimed:	
Flammable/Toxic:	Toxic

Process ID:	1000047659
Description:	CR BD 35's Sphere
Process Chemical ID:	1000057920
Program Level:	Program Level 3 process
Chemical Name:	1,3-Butadiene
CAS Number:	106-99-0
Quantity (lbs):	20143434
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000047662
Description:	Piperylene 12's
Process Chemical ID:	1000057923
Program Level:	Program Level 3 process

Chemical Name:	1,3-Pentadiene
CAS Number:	504-60-9
Quantity (lbs):	5631122
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000047655
Description:	1-Butene 35-12
Process Chemical ID:	1000057916
Program Level:	Program Level 3 process
Chemical Name:	1-Butene
CAS Number:	106-98-9
Quantity (lbs):	7470465
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000047656
Description:	VAM 35
Process Chemical ID:	1000057917
Program Level:	Program Level 3 process
Chemical Name:	Vinyl acetate monomer [Acetic acid ethenyl ester]
CAS Number:	108-05-4
Quantity (lbs):	11624383
CBI Claimed:	
Flammable/Toxic:	Toxic

Process ID:	1000047665
Description:	BD Tank 105-3
Process Chemical ID:	1000057926
Program Level:	Program Level 3 process
Chemical Name:	1,3-Butadiene
CAS Number:	106-99-0
Quantity (lbs):	22241593
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000047664
Description:	Butene-1 Spheres 11&22
Process Chemical ID:	1000057925
Program Level:	Program Level 3 process
Chemical Name:	1-Butene
CAS Number:	106-98-9
Quantity (lbs):	6965706
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000047660
Description:	CR Isoprene 105-1/35-16
Process Chemical ID:	1000057921
Program Level:	Program Level 3 process
Chemical Name:	Isoprene [1,3-Butadiene, 2-methyl-]
CAS Number:	78-79-5
Quantity (lbs):	33571077
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000047658
Description:	Butylene 25
Process Chemical ID:	1000057919
Program Level:	Program Level 3 process
Chemical Name:	1-Butene
CAS Number:	106-98-9
Quantity (lbs):	4880433
CBI Claimed:	
Flammable/Toxic:	Flammable

Process NAICS

Process ID:	1000047655
Process NAICS ID:	1000048077
Program Level:	Program Level 3 process
NAICS Code:	49319
NAICS Description:	Other Warehousing and Storage

Process ID:	1000047657
Process NAICS ID:	1000048079
Program Level:	Program Level 3 process
NAICS Code:	49319
NAICS Description:	Other Warehousing and Storage

Process ID:	1000047659
Process NAICS ID:	1000048081
Program Level:	Program Level 3 process
NAICS Code:	49319
NAICS Description:	Other Warehousing and Storage

Process ID:	1000047660
Process NAICS ID:	1000048082
Program Level:	Program Level 3 process
NAICS Code:	49319
NAICS Description:	Other Warehousing and Storage

Process ID:	1000047661
Process NAICS ID:	1000048083

Program Level:	Program Level 3 process
NAICS Code:	49319
NAICS Description:	Other Warehousing and Storage

Process ID:	1000047662
Process NAICS ID:	1000048084
Program Level:	Program Level 3 process
NAICS Code:	49319
NAICS Description:	Other Warehousing and Storage

Process ID:	1000047663
Process NAICS ID:	1000048085
Program Level:	Program Level 3 process
NAICS Code:	49319
NAICS Description:	Other Warehousing and Storage

Process ID:	1000047664
Process NAICS ID:	1000048086
Program Level:	Program Level 3 process
NAICS Code:	49319
NAICS Description:	Other Warehousing and Storage

Process ID:	1000047656
Process NAICS ID:	1000048078
Program Level:	Program Level 3 process
NAICS Code:	49319
NAICS Description:	Other Warehousing and Storage

Process ID:	1000047658
Process NAICS ID:	1000048080
Program Level:	Program Level 3 process
NAICS Code:	49319
NAICS Description:	Other Warehousing and Storage

Process ID:	1000047665
Process NAICS ID:	1000048087
Program Level:	Program Level 3 process
NAICS Code:	49319
NAICS Description:	Other Warehousing and Storage

Process ID:	1000047676
Process NAICS ID:	1000048098
Program Level:	Program Level 3 process
NAICS Code:	49319
NAICS Description:	Other Warehousing and Storage

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000038979

Percent Weight:	100.0
Physical State:	Liquid
Model Used:	EPA's RMP*Comp(TM)
Release Duration (mins):	2560
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Urban

Passive Mitigation Considered

Dikes:	Yes
Enclosures:	
Berms:	
Drains:	Yes
Sumps:	Yes
Other Type:	Remote monitoring capability of operating conditions

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000041189

Percent Weight:	100.0
Physical State:	Liquid
Model Used:	EPA's RMP*Comp(TM)
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Urban

Passive Mitigation Considered

Dikes:	Yes
Enclosures:	
Berms:	
Drains:	Yes
Sumps:	Yes
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	Yes
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	Yes
Scrubbers:	
Emergency Shutdown:	Yes
Other Type:	Remote monitoring capability of operating conditions

Section 4. Flammables: Worst Case

Flammable Worst ID: 1000029897

Model Used:	EPA's RMP*Comp(TM)
Endpoint used:	1 PSI

Passive Mitigation Considered

Blast Walls:	
Other Type:	Remote monitoring capability of operating conditions

Section 5. Flammables: Alternative Release

Flammable Alter ID: 1000028058

Model Used:	EPA's RMP*Comp(TM)

Passive Mitigation Considered

Dikes:	Yes
Fire Walls:	Yes
Blast Walls:	
Enclosures:	
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	Yes
Water Curtain:	
Excess Flow Valve:	
Other Type:	Remote monitoring capability of operating conditions

Section 6. Accident History

No records found.

Section 7. Program Level 3

Description

1-Butene 35-12

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000049378
Chemical Name:	1-Butene
Flammable/Toxic:	Flammable
CAS Number:	106-98-9

Process ID:	1000047655
Description:	1-Butene 35-12
Prevention Program Level 3 ID:	1000041386
NAICS Code:	49319

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	01-Dec-2010

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	01-Dec-2010

The Technique Used

What If:	Yes
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):	30-Nov-2012

Major Hazards Identified

Toxic Release:	
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	Yes
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes

Earthquake:	
Floods (Flood Plain):	Yes
Tornado:	Yes
Hurricanes:	Yes
Other Major Hazard Identified:	

Process Controls in Use

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

Mitigation Systems in Use

Sprinkler System:	
Dikes:	Yes
Fire Walls:	Yes
Blast Walls:	
Deluge System:	Yes
Water Curtain:	
Enclosure:	
Neutralization:	
None:	
Other Mitigation System in Use:	Fixed monitors

Monitoring/Detection Systems in Use

Process Area Detectors:	
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	Remote monitoring capability of operating conditions

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	Yes
Change Process Parameters:	Yes

Installation of Process Controls:	
Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	Yes
None Recommended:	
None:	
Other Changes Since Last PHA or PHA Update:	Remote monitoring capability of operating conditions

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	26-Mar-2013

Training

Training Revision Date (The date of the most recent review or revision of training programs):	03-Jun-2013

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	Computer Based Training

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	Yes
Demonstration:	Yes
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):	05-Dec-2013
Equipment Inspection Date (The date of the most recent equipment inspection or test):	11-Dec-2013
Equipment Tested (Equipment most recently inspected or tested):	Pumps, Relief Valves, Piping, Refrigeration, Tanks

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	18-Jun-2012
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	26-Nov-2013

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	25-Jun-2012

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	20-Sep-2013
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	31-Jul-2014

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	11-May-2010
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	19-Jan-2012

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	05-Jul-2012

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	27-Feb-2012

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	22-Feb-2013
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	02-Dec-2013

Confidential Business Information

CBI Claimed:

Description

Butadiene 25's

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000049379
Chemical Name:	1,3-Butadiene
Flammable/Toxic:	Flammable
CAS Number:	106-99-0

Process ID:	1000047657
Description:	Ref BD 25's Spheres
Prevention Program Level 3 ID:	1000041387
NAICS Code:	49319

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	01-Dec-2011

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	01-Dec-2011

The Technique Used

What If:	Yes
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):	01-Dec-2016

Major Hazards Identified

Toxic Release:	
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	Yes
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	

Floods (Flood Plain):	Yes
Tornado:	Yes
Hurricanes:	Yes
Other Major Hazard Identified:	

Process Controls in Use

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

Mitigation Systems in Use

Sprinkler System:	
Dikes:	Yes
Fire Walls:	Yes
Blast Walls:	
Deluge System:	
Water Curtain:	
Enclosure:	
Neutralization:	
None:	
Other Mitigation System in Use:	Fixed monitors

Monitoring/Detection Systems in Use

Process Area Detectors:	
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	Remote monitoring capability of operating conditions

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:	
None:	
Other Changes Since Last PHA or PHA Update:	Remote monitoring capability of operating conditions

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	26-Mar-2013

Training

Training Revision Date (The date of the most recent review or revision of training programs):	03-Jun-2013

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	Computer Based Training

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	Yes
Demonstration:	Yes
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):	05-Dec-2013
Equipment Inspection Date (The date of the most recent equipment inspection or test):	10-Dec-2013
Equipment Tested (Equipment most recently inspected or tested):	Pumps, Relief Valves, Piping, Refrigeration, Tanks

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	14-Mar-2012
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	26-Nov-2013

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	30-Mar-2012

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	20-Sep-2013
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	31-Jul-2014

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	24-May-2012
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	24-May-2012

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	05-Jul-2012

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	27-Feb-2012

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	22-Feb-2013
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	02-Dec-2013

Confidential Business Information

CBI Claimed:

Description

Butadiene 35's

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000049380
Chemical Name:	1,3-Butadiene
Flammable/Toxic:	Flammable
CAS Number:	106-99-0

Process ID:	1000047659
Description:	CR BD 35's Sphere
Prevention Program Level 3 ID:	1000041388
NAICS Code:	49319

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	13-Dec-2011

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	13-Dec-2011

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):	13-Dec-2016

Major Hazards Identified

Toxic Release:	
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	Yes
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	

Floods (Flood Plain):	Yes
Tornado:	Yes
Hurricanes:	Yes
Other Major Hazard Identified:	

Process Controls in Use

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

Mitigation Systems in Use

Sprinkler System:	
Dikes:	Yes
Fire Walls:	Yes
Blast Walls:	
Deluge System:	Yes
Water Curtain:	
Enclosure:	
Neutralization:	
None:	
Other Mitigation System in Use:	Fixed Monitors

Monitoring/Detection Systems in Use

Process Area Detectors:	
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	Remote monitoring capability of operating conditions

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	
Change Process Parameters:	
Installation of Process Controls:	Yes

Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	Yes
None Recommended:	
None:	
Other Changes Since Last PHA or PHA Update:	Remote monitoring capability of operating conditions

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	26-Mar-2013

Training

Training Revision Date (The date of the most recent review or revision of training programs):	03-Jun-2013

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	Computer Based Training

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	
Demonstration:	Yes
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):	05-Dec-2013
Equipment Inspection Date (The date of the most recent equipment inspection or test):	11-Dec-2013
Equipment Tested (Equipment most recently inspected or tested):	Pumps, Relief Valves, Piping, Refrigeration, Tanks

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	14-Mar-2012
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	26-Nov-2013

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	30-Mar-2012

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	20-Sep-2013
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	31-Jul-2014

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	11-Jan-2012
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	11-Jan-2012

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	05-Jul-2012

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	27-Feb-2012

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	22-Feb-2013
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	02-Dec-2013

Confidential Business Information

CBI Claimed:

Description

Crude Isoprene 105-1/35-16

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000049381
Chemical Name:	Isoprene [1,3-Butadiene, 2-methyl-]
Flammable/Toxic:	Flammable
CAS Number:	78-79-5

Process ID:	1000047660
Description:	CR Isoprene 105-1/35-16
Prevention Program Level 3 ID:	1000041389
NAICS Code:	49319

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	30-Sep-2009

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	30-Sep-2009

The Technique Used

What If:	Yes
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):	30-Sep-2010

Major Hazards Identified

Toxic Release:	
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	Yes
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	

Floods (Flood Plain):	Yes
Tornado:	Yes
Hurricanes:	Yes
Other Major Hazard Identified:	

Process Controls in Use

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

Mitigation Systems in Use

Sprinkler System:	
Dikes:	Yes
Fire Walls:	Yes
Blast Walls:	
Deluge System:	
Water Curtain:	
Enclosure:	
Neutralization:	
None:	
Other Mitigation System in Use:	Fixed monitors

Monitoring/Detection Systems in Use

Process Area Detectors:	
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	Remote monitoring capability of operating conditions

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:	
None:	
Other Changes Since Last PHA or PHA Update:	Remote monitoring capability of operating conditions

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	26-Mar-2013

Training

Training Revision Date (The date of the most recent review or revision of training programs):	03-Jun-2013

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	Computer Based Training

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	Yes
Demonstration:	Yes
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):	05-Dec-2013
Equipment Inspection Date (The date of the most recent equipment inspection or test):	12-Dec-2013
Equipment Tested (Equipment most recently inspected or tested):	Pumps, Relief Valves, Piping, Refrigeration, Tanks

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	30-Sep-2009
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	26-Nov-2013

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	12-Dec-2013

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	20-Sep-2013
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	31-Jul-2014

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	09-Jul-2013
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	31-Dec-2013

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	05-Jul-2012

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	27-Feb-2012

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	22-Feb-2013
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	02-Dec-2013

Confidential Business Information

CBI Claimed:

Description

VAM 12's

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000049382
Chemical Name:	Vinyl acetate monomer [Acetic acid ethenyl ester]
Flammable/Toxic:	Toxic
CAS Number:	108-05-4

Process ID:	1000047661
Description:	VAM 12's
Prevention Program Level 3 ID:	1000041390
NAICS Code:	49319

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	06-Jan-2011

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	06-Jan-2011

The Technique Used

What If:	Yes
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):	31-Jan-2011

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	Yes
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	
Earthquake:	

Floods (Flood Plain):	Yes
Tornado:	Yes
Hurricanes:	Yes
Other Major Hazard Identified:	

Process Controls in Use

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

Mitigation Systems in Use

Sprinkler System:	
Dikes:	Yes
Fire Walls:	Yes
Blast Walls:	
Deluge System:	
Water Curtain:	
Enclosure:	
Neutralization:	
None:	
Other Mitigation System in Use:	Fixed monitors

Monitoring/Detection Systems in Use

Process Area Detectors:	
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	Remote monitoring capability of operating conditions

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	
Change Process Parameters:	
Installation of Process Controls:	Yes

Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	
None Recommended:	
None:	
Other Changes Since Last PHA or PHA Update:	Remote monitoring capability of operating conditions

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	26-Mar-2013

Training

Training Revision Date (The date of the most recent review or revision of training programs):	06-Sep-2013

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	Computer Based Training

The Type of Competency Testing Used

Written Tests:	
Oral Tests:	Yes
Demonstration:	Yes
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):	05-Dec-2013
Equipment Inspection Date (The date of the most recent equipment inspection or test):	05-Dec-2013
Equipment Tested (Equipment most recently inspected or tested):	Pumps, Piping, Tanks

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	06-Dec-2011
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	26-Nov-2013

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	10-Feb-2012

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	20-Sep-2013
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	31-Jul-2014

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	09-Mar-2012
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	09-Mar-2012

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	05-Jul-2012

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	27-Feb-2012

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	22-Feb-2013
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	02-Dec-2013

Confidential Business Information

CBI Claimed:

Description

12's Piperylene

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000049383
Chemical Name:	1,3-Pentadiene
Flammable/Toxic:	Flammable
CAS Number:	504-60-9

Process ID:	1000047662
Description:	Piperylene 12's
Prevention Program Level 3 ID:	1000041391
NAICS Code:	49319

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	31-Dec-2012

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	31-Dec-2012

The Technique Used

What If:	Yes
Checklist:	
What If/Checklist:	
HAZOP:	
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):	31-Dec-2014

Major Hazards Identified

Toxic Release:	
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	Yes
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	

Floods (Flood Plain):	Yes
Tornado:	Yes
Hurricanes:	Yes
Other Major Hazard Identified:	

Process Controls in Use

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

Mitigation Systems in Use

Sprinkler System:	
Dikes:	Yes
Fire Walls:	Yes
Blast Walls:	
Deluge System:	Yes
Water Curtain:	
Enclosure:	
Neutralization:	
None:	
Other Mitigation System in Use:	fixed fire monitors

Monitoring/Detection Systems in Use

Process Area Detectors:	
Perimeter Monitors:	
None:	Yes
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:	
None:	Yes
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):	26-Mar-2013

Training

Training Revision Date (The date of the most recent review or revision of training programs):	06-Sep-2013

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	computer based training

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	Yes
Demonstration:	Yes
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):	05-Dec-2013
Equipment Inspection Date (The date of the most recent equipment inspection or test):	22-Mar-2012
Equipment Tested (Equipment most recently inspected or tested):	pumps, valves, refrigeration, piping

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	28-Mar-2008
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	26-Nov-2013

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	28-Mar-2008

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	20-Sep-2013
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	31-Jul-2014

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	05-Jul-2012

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	27-Feb-2012

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	22-Feb-2013
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	02-Dec-2013

Confidential Business Information

CBI Claimed:

Description

Raffinate 31's

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000049384
Chemical Name:	1-Butene
Flammable/Toxic:	Flammable
CAS Number:	106-98-9

Process ID:	1000047663
Description:	Raffinate 31's
Prevention Program Level 3 ID:	1000041392
NAICS Code:	49319

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	17-Nov-2011

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	17-Nov-2011

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):	17-Nov-2016

Major Hazards Identified

Toxic Release:	
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	

Floods (Flood Plain):	Yes
Tornado:	Yes
Hurricanes:	Yes
Other Major Hazard Identified:	

Process Controls in Use

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

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	Yes
Fire Walls:	Yes
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:	Remote monitoring capability of operating conditions

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:	Yes
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	
None Recommended:	
None:	
Other Changes Since Last PHA or PHA Update:	Remote monitoring capability of operating conditions

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	26-Mar-2013

Training

Training Revision Date (The date of the most recent review or revision of training programs):	03-Jun-2013

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	computer based training

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	Yes
Demonstration:	Yes
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):	05-Dec-2013
Equipment Inspection Date (The date of the most recent equipment inspection or test):	17-Dec-2013
Equipment Tested (Equipment most recently inspected or tested):	piping, pumps, relief valves

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	23-Sep-2010
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	26-Nov-2013

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	31-Jan-2012

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	20-Sep-2013
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	31-Jul-2014

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	05-Jul-2012

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	27-Feb-2012

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	22-Feb-2013
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	02-Dec-2013

Confidential Business Information

CBI Claimed:

Description

Butene-1 Spheres 11 & 22

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000049385
Chemical Name:	1-Butene
Flammable/Toxic:	Flammable
CAS Number:	106-98-9

Process ID:	1000047664
Description:	Butene-1 Spheres 11&22
Prevention Program Level 3 ID:	1000041393
NAICS Code:	49319

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	17-Nov-2011

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	17-Nov-2011

The Technique Used

What If:	Yes
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):	17-Nov-2016

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):	Yes
Tornado:	
Hurricanes:	Yes
Other Major Hazard Identified:	

Process Controls in Use

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

Mitigation Systems in Use

Sprinkler System:	
Dikes:	Yes
Fire Walls:	Yes
Blast Walls:	
Deluge System:	Yes
Water Curtain:	
Enclosure:	
Neutralization:	
None:	
Other Mitigation System in Use:	

Monitoring/Detection Systems in Use

Process Area Detectors:	
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	Remote monitoring capability of operating conditions

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:	
None:	
Other Changes Since Last PHA or PHA Update:	Remote monitoring capability of operating conditions

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	26-Mar-2013

Training

Training Revision Date (The date of the most recent review or revision of training programs):	03-Jun-2013

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	Computer Based Training

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	Yes
Demonstration:	Yes
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):	05-Dec-2013
Equipment Inspection Date (The date of the most recent equipment inspection or test):	17-Dec-2013
Equipment Tested (Equipment most recently inspected or tested):	pumps, piping, refrigeration

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	20-Jan-2012
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	26-Nov-2013

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	27-Jan-2012

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	20-Sep-2013
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	31-Jul-2014

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	05-Jul-2012

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	27-Feb-2012

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	22-Feb-2013
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	02-Dec-2013

Confidential Business Information

CBI Claimed:

Description

VAM 35

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000049386
Chemical Name:	Vinyl acetate monomer [Acetic acid ethenyl ester]
Flammable/Toxic:	Toxic
CAS Number:	108-05-4

Process ID:	1000047656
Description:	VAM 35
Prevention Program Level 3 ID:	1000041394
NAICS Code:	49319

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	25-Jun-2009

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	25-Jun-2009

The Technique Used

What If:	Yes
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):	25-Jun-2014

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	Yes
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	
Earthquake:	

Floods (Flood Plain):	Yes
Tornado:	Yes
Hurricanes:	Yes
Other Major Hazard Identified:	

Process Controls in Use

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

Mitigation Systems in Use

Sprinkler System:	
Dikes:	
Fire Walls:	Yes
Blast Walls:	
Deluge System:	
Water Curtain:	
Enclosure:	
Neutralization:	
None:	
Other Mitigation System in Use:	Fixed monitors

Monitoring/Detection Systems in Use

Process Area Detectors:	
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	Remote monitoring capability of operating conditions

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	Yes
Change Process Parameters:	
Installation of Process Controls:	Yes

Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	Yes
None Recommended:	
None:	
Other Changes Since Last PHA or PHA Update:	Remote monitoring capability of operating conditions

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	26-Mar-2013

Training

Training Revision Date (The date of the most recent review or revision of training programs):	12-Nov-2013

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	Computer Based Training

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	Yes
Demonstration:	Yes
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):	05-Dec-2013
Equipment Inspection Date (The date of the most recent equipment inspection or test):	26-Sep-2011
Equipment Tested (Equipment most recently inspected or tested):	pumps, relief valves, piping, tanks

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	06-Dec-2011
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	26-Nov-2013

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	20-Dec-2011

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	20-Sep-2013
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	31-Jul-2014

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	05-Jul-2012

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	27-Feb-2012

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	22-Feb-2013
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	02-Dec-2013

Confidential Business Information

CBI Claimed:

Description

butylene 25

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000049387
Chemical Name:	1-Butene
Flammable/Toxic:	Flammable
CAS Number:	106-98-9

Process ID:	1000047658
Description:	Butylene 25
Prevention Program Level 3 ID:	1000041395
NAICS Code:	49319

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	01-Dec-2011

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	01-Dec-2011

The Technique Used

What If:	Yes
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):	01-Dec-2016

Major Hazards Identified

Toxic Release:	
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	Yes
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	

Floods (Flood Plain):	Yes
Tornado:	Yes
Hurricanes:	Yes
Other Major Hazard Identified:	

Process Controls in Use

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

Mitigation Systems in Use

Sprinkler System:	
Dikes:	Yes
Fire Walls:	Yes
Blast Walls:	
Deluge System:	Yes
Water Curtain:	
Enclosure:	
Neutralization:	
None:	
Other Mitigation System in Use:	

Monitoring/Detection Systems in Use

Process Area Detectors:	
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	Remote monitoring capability of operating conditions

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:	
None:	
Other Changes Since Last PHA or PHA Update:	Remote monitoring capability of operating conditions

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	26-Mar-2013

Training

Training Revision Date (The date of the most recent review or revision of training programs):	03-Jun-2013

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	Computer Based Training

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	Yes
Demonstration:	Yes
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):	05-Dec-2013
Equipment Inspection Date (The date of the most recent equipment inspection or test):	10-Dec-2013
Equipment Tested (Equipment most recently inspected or tested):	pumps, relief valves, tanks, piping

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	13-Apr-2011
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	26-Nov-2013

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	14-Apr-2011

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	20-Sep-2013
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	31-Jul-2014

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	05-Jul-2012

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	27-Feb-2012

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	22-Feb-2013
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	02-Dec-2013

Confidential Business Information

CBI Claimed:

Description

BD Tank 105-3

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000049388
Chemical Name:	1,3-Butadiene
Flammable/Toxic:	Flammable
CAS Number:	106-99-0

Process ID:	1000047665
Description:	BD Tank 105-3
Prevention Program Level 3 ID:	1000041396
NAICS Code:	49319

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	29-May-2012

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	29-May-2012

The Technique Used

What If:	Yes
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):	29-May-2017

Major Hazards Identified

Toxic Release:	
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	Yes
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	

Floods (Flood Plain):	Yes
Tornado:	Yes
Hurricanes:	Yes
Other Major Hazard Identified:	

Process Controls in Use

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

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:	Fixed Monitors

Monitoring/Detection Systems in Use

Process Area Detectors:	
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	Remote monitoring capability of operating conditions

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	Yes
Change Process Parameters:	
Installation of Process Controls:	Yes

Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	Yes
None Recommended:	
None:	
Other Changes Since Last PHA or PHA Update:	Remote montoring capability of operating conditions

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	21-Jan-2014

Training

Training Revision Date (The date of the most recent review or revision of training programs):	14-Jan-2014

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	Computer Based Training

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	Yes
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	Computer Based Training

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	05-Dec-2013
Equipment Inspection Date (The date of the most recent equipment inspection or test):	16-Dec-2013
Equipment Tested (Equipment most recently inspected or tested):	pumps, relief valves, refrigeration, piping, tanks

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	18-Jun-2012
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	26-Nov-2013

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	19-Jul-2012

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	20-Sep-2013
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	31-Jul-2014

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	05-Jul-2012

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	27-Feb-2012

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	22-Feb-2013
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	02-Dec-2013

Confidential Business Information

CBI Claimed:

Description

No description available.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000049626
Chemical Name:	Vinyl acetate monomer [Acetic acid ethenyl ester]
Flammable/Toxic:	Toxic
CAS Number:	108-05-4

Process ID:	1000047676
Description:	VAM 30
Prevention Program Level 3 ID:	1000041640
NAICS Code:	49319

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	04-Dec-2013

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	04-Dec-2013

The Technique Used

What If:	Yes
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):	04-Dec-2014

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	Yes
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	
Earthquake:	

Floods (Flood Plain):	Yes
Tornado:	Yes
Hurricanes:	Yes
Other Major Hazard Identified:	

Process Controls in Use

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

Mitigation Systems in Use

Sprinkler System:	
Dikes:	
Fire Walls:	Yes
Blast Walls:	
Deluge System:	
Water Curtain:	
Enclosure:	
Neutralization:	
None:	
Other Mitigation System in Use:	Fixed monitors

Monitoring/Detection Systems in Use

Process Area Detectors:	
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	Remote monitoring capability of operating conditions

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:	
None:	Yes
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):	13-Dec-2013

Training

Training Revision Date (The date of the most recent review or revision of training programs):	13-Dec-2013

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	Computer Based Training

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	Yes
Demonstration:	Yes
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):	08-Dec-2013
Equipment Inspection Date (The date of the most recent equipment inspection or test):	21-Nov-2013
Equipment Tested (Equipment most recently inspected or tested):	pumps, relief valves, piping, tanks

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	06-Dec-2013
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	26-Nov-2013

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	24-Dec-2013

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	20-Sep-2013
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	31-Jul-2014

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	05-Jul-2012

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	27-Feb-2012

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	22-Feb-2013
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	02-Dec-2013

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):	25-Jul-2012

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees):	19-Jul-2012

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated):	Deer Park Police Department
Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):	(281) 479-1511

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):	DOT, 30 TAC, USCG

Executive Summary

ACCIDENTAL RELEASE PREVENTION AND EMERGENCY RESPONSE POLICIES

Intercontinental Terminals Company (ITC) in Deer Park, is committed to operating and maintaining our processes (especially those using hazardous substances) in a safe and responsible manner. We use a combination of accidental release prevention and emergency response planning programs to help ensure the safety of our associates and the public, as well as the protection of the environment. This document provides a brief overview of the comprehensive risk management activities that we have designed and implemented, including:

* A description of our facility and our uses of substances that are regulated by EPA's RMP regulation.
* An overview of our accidental release prevention programs.
* A five-year history of accidental releases for chemicals that are regulated by EPA's RMP rule.
* An overview of our emergency response program.
* An overview of planned improvements at the facility to help prevent accidental chemical releases from occurring and therefore adversely affecting our associates, the public, and the environment.
* EPA (RMP) - Required Certifications.
* Detailed information (data elements) about our risk management program.

STATIONARY SOURCE AND REGULATED SUBSTANCES

At the present time, our facility is a for hire bulk liquid storage facility that stores a variety of chemicals and petrochemicals. Our processes involve the following chemicals that EPA has identified as having the potential to cause significant offsite consequences in the event of a substantial accidental release:

Toxic

Vinyl Acetate Monomer 39,174,491 pounds

Flammables

1,3-Butadiene	57,745,330 pounds
Isoprene	33,571,077 pounds
1-Butene	26,401,127 pounds
Butylene	4,880,433 pounds
1,3-Pentadiene (Piperylene)	5,631,122 pounds

Our accidental release prevention programs and our contingency planning efforts help us to effectively manage the hazards that are presented to our associates, the public, and the environment by our handling of these chemicals.

GENERAL ACCIDENTAL RELEASE PREVENTION PROGRAM AND CHEMICAL-SPECIFIC PREVENTION STEPS

We take a systematic, proactive approach to the prevention of accidental releases of hazardous chemicals. Our management system addresses each key feature of a successful prevention program including:

* Process safety information
* Process hazard analysis
* Operating procedures
* Training
* Mechanical integrity
* Management of change
* Pre-startup review
* Compliance audits
* Incident investigation
* Employee participation

* Hot work permit
* Contractors

These individual elements of our prevention program work together to prevent accidental chemical releases. Our company and our employees are committed to the standard that these management systems set for the way we do business; and, we have specific accountabilities and controls to ensure that we are meeting our own high standards for accident prevention.

FIVE-YEAR ACCIDENT HISTORY

We keep records for all near misses and significant accidental chemical releases that occur at our facility. The following is a brief summary of accidental chemical releases involving materials covered under EPA's RMP rule during the past five years:

Toxic

No incidents have occured under the EPA's definition.

Flammables

No incidents have occured under the EPA's definition.

EMERGENCY RESPONSE PROGRAM

We maintain an integrated contingency plan, which consolidates all of the various federal, state, and local regulatory requirements for emergency response planning. Our program provides the essential planning and training for effectively protecting workers, the public, and the environment during emergency situations. Furthermore, we coordinate our plan with community emergency response plans.

PLANNED CHANGES TO IMPROVE SAFETY

The following is a list of improvements that we plan to implement at the facility to help prevent and/or better respond to accidental chemical releases:

Vinyl Acetate Monomer System

None

1,3-Butadiene System

None

Isoprene system

None

1-Butene System

None

1,3-Pentadiene (Piperylene)System

Will be transitioned to new tank with high/low level alarm, high level shutdown on tank, high temperature/pressure shutdown before end of 2014

CERTIFICATIONS

Within the past five years, ITC's processes have experienced no accidental releases that caused an offsite impact. No additional measures were necessary to prevent offsite impacts from accidental releases. In the event of fire, explosion, or the release of a regulated substance from a process, entry within the distance encompassed by the specified endpoints may pose a danger to public emergency responders. Therefore, public emergency responders should not enter this area except as indicated in the RMP plan. The undersigned certifies that, to the best of my knowledge, information, and belief, which was formed after reasonable inquiry, the information submitted is true accurate, and complete.

Toxic Chemical

Vinyl Acetate Monomer

Flammables
1,3-Butadiene
Isoprene
1-Butene
1,3-Pentadiene (Piperylene)

For all other covered processes, the undersigned also certifies that, to the best of my knowledge, information, and belief, which was formed after reasonable inquiry, the other information submitted in this RMP plan is true, accurate, and complete.

Signature:

Title:

Date:

RMP DATA ELEMENTS

The following pages present additional information about our risk management program as requested under the RMP rule of the EPA. The information is categorized as follows:

Registration
Offsite consequence analysis
Five-year accident history
Program 3 prevention program
Emergency response program