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Emergency Operations Plan

Formosa Utility Venture, Ltd.,
&
Neumin Production Company

March 2023

Emergency Operations Plan Table of Contents

Executive Summary

In accordance with 16 Tex. Admin. Code ("TAC") § 25.53 ("the Rule"), Formosa Utility Venture, Ltd. ("Formosa") submits its emergency operations plan ("EOP") and supporting documents on behalf of itself and Neumin Production Company ("Neumin"). Formosa is a registered Power Generating Company ("PGC"), and Neumin is a registered Option II Retail Electric Provider ("REP"). Formosa has assembled this EOP to address common operational functions that are relevant across emergency types and specific types of emergencies relevant to power generating companies and retail electric providers.

EOP Sections 1.0–5.0 are applicable to both the Formosa PGC and Neumin REP. EOP Section 6.0 provides the annexes relevant to PGCs and REPs, as required by 16 TAC § 25.53(e). While all the EOP Section 6.0 annexes are applicable to the Formosa PGC, only EOP Sections 6.4–6.8 apply to the Neumin REP.

The EOP contains the following sections, organized around the Rule's requirements:

- **1.0 Approval and Implementation Plan**
    - Introduces the EOP and outlines its applicability to the relevant entities. Provides the individuals responsible for maintaining, implementing, and changing the EOP, a revision control summary, and relevant approvals.
- **2.0 Communication Plan**
    - 2.1 Communications During Incidents and Severe Weather: Provides procedures to facilitate open communications with outside entities during incidents and severe weather events, and ensures these communications are managed appropriately.
    - 2.2 Community / Agency Notifications: Provides a list of community and agency contacts to notify if an incident occurs.
    - 2.3 Emergency Notification System & Activation: Provides the conditions under which the facility will activate its emergency alarms.
    - 2.4 Emergency Action Plan: Provides emergency escape routes, guidelines, evacuation routes, and assigned safe assembly locations for accountability purposes.
- **3.0 Emergency Response Supply Plan**
    - 3.1 Tropical Weather Plan: Provides a pre-identified list of supplies relevant to emergency responses.
    - 3.2 Tropical Weather Checklist: Provides a checklist that includes securing supplies and equipment before, during, and after an incident, and provides steps for inventorying resources post-incident.
- **4.0 Emergency Response Staffing Plan**
    - 4.1 Emergency Response Team: Provides information on staffing and membership of the emergency response team.

- **5.0 Weather-related Hazard Identification Plan**
    - 5.1 Weather Phases: Provides procedures for identifying weather-related hazards and guidelines for the protection of personnel and equipment during inclement weather events, including lightning strikes, fog, tropical weather, high winds, extreme heat, and winter weather conditions.
- **6.0 Annexes**
- **6.1 Weather Emergency Annex**
    - 6.1.1 Winter Weatherization Plan: Provides procedures to prepare and protect the facility's power generation resources from freezing temperatures and/or severe weather storms.
    - 6.1.2 Freeze Protection Procedure: Provides guidelines for implementing freeze protection measures and preventing equipment damage due to freezing conditions.
    - 6.1.3 Cogen Freeze Protection Procedure & Cogen Freeze Protection Checklist: Provides procedures for protecting instrument sensing tubing that is susceptible to freezing temperatures, and a checklist to protect Cogen equipment from freezing.
    - 6.1.4 Demin Freeze Protection Procedure: Provides guidelines for implementing freeze protection measures for water treatment areas to maintain equipment integrity, unit operation, and employee well-being.
    - 6.1.5 Freezing Weather Guideline: Provides guidelines to ensure the well-being of employees and the integrity of equipment and operations during freezing weather events.
    - 6.1.6 Summer Weatherization Plan: Provides procedures for preparing and protecting power generation resources for summer temperatures, such as excessive prolonged heat events and/or severe weather storms, to ensure the safe and reliable operation of the units.
    - 6.1.7 Heat Stress Procedure: Provides guidelines for recognizing and addressing the hazards associated with working in hot environments.
    - 6.1.8 Utility Internal Tropical Weather Plan: Provides guidelines and checklists to be used during tropical storms, hurricanes, and the summer months. The Summer Weatherization Plan refers to these checklists for use during extreme heat. Assists the Utilities Plant with following the FPC TX Tropical Weather Plan.
- **6.2 Water Shortage Annex**
    - 6.2.1 Lavaca-Navidad River Authority Drought Contingency Plan: Provides temporary methods designed to be used during an emergency or other short water supply events and explains how stored water supplies will be managed during water shortages.
- **6.3 Restoration of Service Annex**
    - 6.3.1 Utility Start Up After a Black Out: Provides an operational list of steps to restart and restore the utility service after a black out event.

- 6.3.2 Emergency Load Shedding: Provides operational guidelines to implement power load shedding actions during emergency situations.

- **6.4 Pandemic and Epidemic Annex**
  - 6.4.1 Pandemic Preparedness Plan: Provides procedures to respond safely, efficiently, and effectively to a pandemic, including reducing transmission of the virus, informing and preparing employees, and maintaining essential operations and services.

- **6.5 Hurricane Annex**
  - 6.5.1 FPC TX Tropical Weather Plan: Provides guidelines to ensure the wellbeing of employees, contractors, and their families, and the local community during the threat of a severe tropical storm or hurricane. Defines specific areas of responsibility and procedures to implement when a tropical storm or hurricane is expected in the area.
  - 6.5.2 CFB Tropical Weather Plan: Provides information concerning the actions required before, during, and after tropical weather or hurricane events, including evacuation and re-entry/restart guidelines.
  - 6.5.3 Tropical Weather Checklist: Provides action items and duties for personnel before, during, and after tropical weather or hurricane events.
  - 6.5.4 Utility Internal Tropical Weather Plan: Provides guidelines and checklists to be used during tropical storms, hurricanes, and the summer months. Assists the Utilities Plant with following the FPC TX Tropical Weather Plan.

- **6.6 Cyber Security Annex**
  - 6.6.1 Bulk Electric System Cyber Security Analysis and Planning: Provides a risk-based methodology to identify and document the impact level and cyber assets related to the Bulk Electric System in accordance with NERC Standards.
  - 6.6.2 Process Control and Process Information Network Cyber Security Policy: Provides a series of thirteen procedures to establish a process control and process information network cyber security policy that outlines what must be done to protect Formosa assets and data during a cyber security incident.

- **6.7 Physical Security Incident Annex**
  - 6.7.1 Facility Security Plan: Provides procedures and guidelines for preparing for and responding to an actual, potential, or perceived Transportation Security Incident.
  - 6.7.2 NERC Event Reporting Requirements: Provides guidelines for the threat response team to understand, recognize, communicate, and respond to a physical event or threat occurrence (either threatened or recognized) and to report them to the appropriate personnel, governmental entities, and regulatory bodies.

- **6.8 Other Emergency Incidents**
  - 6.8.1 Fire: Provides guidelines for responding to a fire incident in the facility.

Training

Training for this procedure will be computer-based training. Relevant operating personnel within Formosa and Neumin have received the EOP and received training on the applicable contents and execution of the EOP by March 15, 2023.

Record of Distribution

Name	Title	Review/Training Date:
Philip PJ Manning	Power Department Manager	3/6/2023
Yvonne Solis	Administrator	2/28/2023
Wei-ching Sun	Utility Executive Director	2/24/2023
Nicolas Brito	Staff Engineer	2/23/2023
Bobby Flores	Day Shift Supervisor	2/27/2023
Chance Goodman	Staff Engineer	3/6/2023
Lucas Lu	Staff Engineer	2/23/2023
Michael Metting	Staff Engineer	2/28/2023
Chuan Qin	Staff Engineer	2/24/2023
Case Winter	Staff Engineer	2/23/2023
Tony Grantland	Shift Supervisor	2/27/2023
Freddie Hernandez	Shift Supervisor	2/26/2023
Don Parker	Shift Supervisor	On Short-Term, Will Be Trained Upon Return
Xiangting (Ting) Hou	Staff Engineer	2/27/2023
Jay Huang	Staff Engineer	2/27/2023
Lee Jones	Day Shift Supervisor	3/2/2023
Chad Lee	Operations Manager	3/2/2023
Randy Nichols	Day Shift Supervisor	2/28/2023
David Sassman	Operations Staff	3/6/2023
Sam Wilson	Staff Engineer	2/27/2023
Kirk Zhang	Staff Engineer	2/24/2023
Richard Chavez	Day Shift Supervisor	3/3/2023
Chris Gonzales	Day Shift Supervisor	2/27/2023
Matt Kurtz	Day Shift Supervisor	2/27/2023
Mark Rodriguez	Day Shift Supervisor	3/3/2023
Eric Woelfel	REP	3/2/2023
Thomas Lo	REP	2/24/2023

List of Emergency Contacts

Name	Title	Contact Information
Mike Rivet	General Manager	361-920-2934
Paul Murry	Emergency Response Coordinator	361-220-0127
Stephen Phillips	HS Manager	361-220-1119
Shane Burgin	Safety Director	361-212-2620

STATE OF NEW JERSEY §
§
COUNTY OF ESSEX §

AFFIDAVIT OF KEN MOUNGER

BEFORE ME, the undersigned authority, on this day appeared Ken Mounger who being by me first duly sworn, on oath, deposed and said the following:

1. I am the highest-ranking representative, official, or officer with binding authority over Formosa Utility Venture, Ltd. ("Formosa") and Neumin Production Company ("Neumin"). Formosa is a registered power generation company and Neumin is an Option II retail electric provider. I have personal knowledge of the facts stated in this affidavit and they are true and correct.

2. I am familiar with the foregoing, attached Emergency Operations Plan ("EOP")—which is being submitted on behalf of Formosa and Neumin—and the executive summary of the EOP being filed with the Public Utility Commission of Texas in accordance with 16 Tex. Admin. Code ("TAC") § 25.53.

3. The EOP contains confidential, security-sensitive information requiring filing under seal in accordance with 16 TAC § 22.71(d). The EOP also contains Protected Information under the ERCOT Protocols.

4. As required by 16 TAC § 25.53(d)(C)(i), I affirm that all relevant operating personnel within Formosa and Neumin have received the EOP and were trained on their respective applicable portions by March 15, 2023. Such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency.

5. As required by 16 TAC § 25.53(d)(C)(ii), I affirm that the EOP has been reviewed and approved by the appropriate executives.

6. As required by 16 TAC § 25.53(d)(C)(iii), I affirm that a drill was conducted in calendar year 2022 and another drill will be conducted in calendar year 2023 as appropriate for Formosa and Neumin, in accordance with 16 TAC § 25.53(f).

7. As required by 16 TAC § 25.53(d)(C)(iv), I affirm that the EOP or an appropriate summary has been distributed to local jurisdictions as needed.

8. As required by 16 TAC § 25.53(d)(C)(v), I affirm that Formosa and Neumin each maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.

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9. As required by 16 TAC § 25.53(d)(C)(vi), I affirm that Formosa's and Neumin's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

Further affiant sayeth not.

Ken Mounger, Executive Vice President
Formosa Plastics Corporation, Texas as general partner of
Formosa Utility Venture, Ltd.

SUBSCRIBED AND SWORN TO BEFORE ME ON THIS 8th OF MARCH 2023.

Notary Public

NORBERTO J. TORRES
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires March 14, 2024

Emergency Operations Plan

Formosa Utility Venture, Ltd.,
&
Neumin Production Company

March 2023

Introduction and Summary

In accordance with 16 Tex. Admin. Code ("TAC") § 25.53 ("the Rule"), Formosa Utility Venture, Ltd. ("Formosa") submits its emergency operations plan ("EOP") and supporting documents on behalf of itself and Neumin Production Company ("Neumin"). Formosa is a registered power generating company ("PGC"), and Neumin is a registered Option II Retail Electric Provider ("REP"). Formosa has assembled this EOP to address common operational functions that are relevant across emergency types and specific types of emergencies relevant to power generating companies and retail electric providers.

EOP Sections 1.0–5.0 are applicable to both the Formosa PGC and Neumin REP. EOP Section 6.0 provides the annexes relevant to PGCs and REPs, as required by 16 TAC § 25.53(e). While all the EOP Section 6.0 annexes are applicable to the Formosa PGC, only EOP Sections 6.4–6.8 apply to Neumin.

The contents and policies of this EOP are as follows:

1.0 Approval and Implementation Plan

Introduces the EOP and outlines its applicability to the relevant entities. Provides the individuals responsible for maintaining, implementing, and changing the EOP, a revision control summary, and relevant approvals.

2.0 Communication Plan

The Communication Plan facilitates effective communication with the media, regulators, local and state government officials, and other relevant personnel during an emergency response. Section 2.1 contains the "Communications During Incidents and Severe Weather" procedure. This procedure provides guidelines to maintain open communications with outside entities during incidents and severe weather events, and ensures these communications are managed appropriately. Section 2.2 provides the "Community/Agency Notifications" list that contains community and agency contacts to notify if an incident occurs. Section 2.3 provides contains the "Emergency Notification System & Activation" procedure that provides the conditions under which the facility will activate its emergency alarms. Section 2.4 provides the "Utility-1 Emergency Action Plan" which includes emergency escape routes, guidelines, evacuation routes, and assigned safe assembly locations for accountability purposes.

3.0 Emergency Response Supply Plan

The Emergency Response Supply Plan identifies procedures that include pre-identified supplies for use during emergency responses. Section 3.1 contains the "CFB Tropical Weather Plan," which includes a list of supplies relevant to tropical weather events and other emergency responses. Section 3.2 provides the "CFB Tropical Weather Checklist" that includes guidelines for securing supplies and equipment before, during, and after an incident, and provides steps for inventorying resources post-incident. While titled "CFB," these tropical weather plans are applicable to the Formosa PGC and Neumin REP. In addition to the procedures provided in this section, Formosa maintains a supply closet stocked throughout the year with supplies that can be used for emergency response. Formosa's warehouse also contains supplies that can be used during an emergency response.

4.0 Emergency Response Staffing Plan

The Emergency Response Staffing Plan ensures that qualified personnel are available to respond to an emergency. Section 4.1 includes the "Emergency Response Team" procedure that provides information on emergency response team staffing and membership. All emergency response team members are expected to respond to incidents and provide staffing during emergency responses.

5.0 Weather-related Hazard Identification Plan

The Weather-related Hazard Identification Plan addresses how the entities identify a variety of weather-related hazards. Section 5.1 includes the "Weather Phases" procedure that provides guidelines for the protection of personnel and equipment during inclement weather events, including lightning strikes, fog, tropical weather, high winds, extreme heat, and winter weather conditions.

6.0 Annexes

6.1 Weather Emergency Annex

The Weather Emergency Annex provides operational plans for responding to both hot and cold weather emergencies and includes checklists for personnel to use during extreme hot and cold weather emergency responses. Section 6.1.1 includes the "Winter Weatherization Plan" that provides procedures to prepare and protect the facility's power generation resources from freezing temperatures and/or severe weather storms. Section 6.1.2 provides the "Freeze Protection Procedure" that includes guidelines for implementing freeze protection measures and preventing equipment damage due to freezing conditions. Section 6.1.3 provides the "Cogen Freeze Protection Procedure & Cogen Freeze Protection Checklist." This procedure provides guidelines for protecting instrument sensing tubing that is susceptible to freezing temperatures, and a checklist to follow to protect Cogen equipment from freezing. Section 6.1.4 includes the "Demin Freeze Protection Procedure" that provides guidelines for implementing freeze protection measures for water treatment areas to maintain equipment integrity, unit operation, and employee well-being. Section 6.1.5 provides the "Freezing Weather Guideline." This guideline ensures the well-being of employees and the integrity of equipment and operations during freezing weather events. Section 6.1.6 contains procedures for extreme heat, excessive prolonged heat events, and/or severe weather storms. This section includes the "Summer Weatherization Plan," which provides procedures for preparing and protecting power generation resources for summer temperatures to ensure the safe and reliable operation of the units. Section 6.1.7 contains the "Heat Stress Procedure" that includes guidelines for recognizing and addressing the hazards associated with employees working in extreme heat. Section 6.1.8 contains the "Utility Internal Tropical Weather Plan" that assists the Utilities Plant with following the FPC TX Tropical Weather Plan. This plan provides guidelines and checklists for use during tropical storms, hurricanes, and the summer months. In addition, the Summer Weatherization Plan in Section 6.1.6 refers to these checklists for use during extreme heat.

6.2 Water Shortage Annex

The Water Shortage Annex addresses supply shortages of water used in the generation of electricity. Because the Formosa PGC relies on freshwater drawn from its own intakes, rather than municipal or other public water systems for the water used to generate electricity, it is unlikely to experience a water shortage that is not based on a broader drought condition. Accordingly, Section

6.2.1 includes the "Lavaca-Navidad River Authority Drought Contingency Plan" which provides temporary methods designed for use during an emergency or other short water supply events and explains how stored water supplies will be managed during water shortages.

6.3 Restoration of Service Annex

The Restoration of Service Annex identifies steps to take to restore service to a generation resource that has tripped offline or failed to start due to a hazard or threat. Section 6.3.1 contains the "Utility Start Up After a Black Out" list, which provides operational steps to restart and restore the utility service. Section 6.3.2 provides the "Emergency Load Shedding" procedure that includes operational guidelines to implement power load shedding actions during emergency situations.

6.4 Pandemic and Epidemic Annex

The Pandemic and Epidemic Annex provides procedures to respond to the highly variable and unique scenarios posed by a pandemic. Section 6.4.1 includes the "Pandemic Preparedness Plan" that provides procedures to respond safely, efficiently, and effectively to a pandemic, including reducing transmission of the virus, informing and preparing employees, and maintaining essential operations and services.

6.5 Hurricane Annex

The Hurricane Annex provides several procedures that facilitate hurricane preparation efforts, evacuation and re-entry, and hurricane response efforts. Section 6.5.1 includes the "FPC TX Tropical Weather Plan" that provides guidelines to ensure the wellbeing of employees, contractors, and their families, and the local community during the threat of a severe tropical storm or hurricane. The plan also defines specific areas of responsibility and provides procedures to implement when a tropical storm or hurricane is expected in the area. The "CFB Tropical Weather Plan" in Section 6.5.2 provides information concerning the actions required before, during, and after tropical weather or hurricane events, including evacuation and re-entry/restart guidelines. Section 6.5.3 contains the "CFB Tropical Weather Checklist" that provides action items and duties for personnel before, during, and after tropical weather or hurricane events. Section 6.5.4 includes the "Utility Internal Tropical Weather Plan." This plan assists the Utilities Plant with following the FPC TX Tropical Weather Plan and provides guidelines and checklists for use during tropical storms, hurricanes, and the summer months

6.6 Cyber Security Annex

The Cyber Security Annex provides procedures to effectively and immediately respond to a cyber security incident. Section 6.6.1 includes the "Bulk Electric System Cyber Security Analysis and Planning" procedure that provides a risk-based methodology to identify and document the impact level and cyber assets related to the Bulk Electric System in accordance with NERC Standards. Section 6.6.2 provides the "Process Control and Process Information Network Cyber Security Policy." This robust cyber security policy provides a series of thirteen procedures to establish a process control and process information network cyber security policy that protects critical assets and data during cyber security incidents.

6.7 Physical Security Incident Annex

The Physical Security Incident Annex includes comprehensive procedures to respond to a variety of physical security incidents. Section 6.7.1 includes the "Facility Security Plan" that provides procedures and guidelines for preparing for and responding to an actual, potential, or

perceived Transportation Security Incident. Section 6.7.2 includes the "NERC Event Reporting Requirements." These requirements help the threat response team to understand, recognize, communicate, and respond to a physical event or threat occurrence (either threatened or recognized) and to report the events to the appropriate personnel, governmental entities, and regulatory bodies.

6.8 Other Emergency Incidents

The Other Emergency Incidents section provides additional procedures relevant to incident and emergency responses. Section 6.8.1 contains the "Fire" procedure that provides guidelines for responding to a fire incident in the facility.

Emergency Operations Plan

1.0 Approval and Implementation Plan

Formosa Utility Venture, Ltd.,
&
Neumin Production Company

March 2023

1.0 Approval and Implementation Plan

Approval

As of the approval date provided below, this Emergency Operations Plan supersedes and rescinds all previous versions of this document.

Approved:

CT Chen
2/23/2023 5:17:21 PM

Date: _____

Chao-Tang Chen
Vice President
Formosa Plastics Corporation, Texas as general partner of
Formosa Utility Venture, Ltd.

Implementation

The implementation of the various portions of this EOP is the responsibility of a wide swath of personnel across Formosa and Neumin. The EOP itself will be maintained and updated primarily by the following individuals:

- Eric Woelfel, REP Assist
- Thomas Lo, REP
- Wei-Ching Sun, Utility Executive Director
- Phillip Manning, Power Department Manager
- Nicolas Brito, Staff Engineer
- Case Winter, Staff Engineer

Revision Control Summary

Description of Change	Entered By	Date Entered
Revised to include individual procedures that had been updated in the previous calendar year, including the procedures for: • Community and Agency Notifications • Tropical Weather Plan • Weather Phases • Winter Weatherization Plan • Heat Stress Procedure • Utility Internal Tropical Weather Plan • FPC TX Tropical Weather Plan • Emergency Action Plan • Facility Security Plan	N. Brito	3/15/2023

Emergency Operations Plan

2.0 Communication Plan

Formosa Utility Venture, Ltd.,
&
Neumin Production Company

March 2023

FORMOSA PLASTICS CORPORATION, TEXAS
PROCEDURE 04
Communications During Incidents and Severe Weather

Revision Number: 1

FORMOSA PLASTICS CORPORATION, TEXAS
PROCEDURE 04
Communications During Incidents and Severe Weather

1.0 PURPOSE

The purpose of this procedure is to ensure communications between Formosa Plastics Corporation, Texas (FPC-TX) and outside entities are managed appropriately.

2.0 SCOPE

This procedure applies to all communications made to outside entities during incidents and sever weather.

3.0 ORGANIZATIONS AFFECTED

All FPC-TX Facilities

4.0 RESPONSIBILITIES

4.1 The Vice-President and General Manager of FPC-TX is responsible for approving all media correspondences related to incidents and severe weather.

4.2 The Communications Department Director or designee is responsible for specific duties as outlined in this procedure.

4.3 The ISC Department Manager is responsible for specific duties as outlined in this procedure.

4.4 The Health & Safety Department Director is responsible to ensure that the Emergency Operations Center Manager In Charge is knowledgeable and that they comply with the requirements of this procedure.

5.0 DEFINITIONS

5.1 Outside Entities - these may include, but are not limited to employees, community, news media, magazines, trade publications, city and county officials, regulatory agencies, etc.

5.2 EOC MIC – this acronym stands for Emergency Operations Center Manager In Charge. The EOC MIC will be one of the following persons:

5.2.1. Health and Safety Department Director

5.2.2. Health & Safety Department Manager

6.0 KEY POINTS

6.1 None

7.0 GUIDELINES

7.1 Everbridge Mass Notification System

7.1.1 This system allows FPC-TX employees, contractors as well as residents in the surrounding area to receive important notifications and announcements instantly, via email, office phone, cell phone or home phone.

7.1.2 Notifications may be emergency alerts, or may be general announcements. Alerts may include but are not limited to fire, hurricane, and evacuation alerts.

7.1.3 Enroll in this service to utilize the system by going to the FPC-TX intranet site "Everbridge Portal" and following instructions provided.

7.1.4 The FPC-TX Communications Department Director or designee will utilize this system to make notifications as determined appropriate.

7.2. Employee Information Hotline

7.2.1 Hotline numbers are [redacted] or [redacted]. This Hotline will include messages containing information about FPC-TX employees work schedules.

7.2.2 Hotline Information and contact phone numbers will be developed and maintained by the Communications Department Director and the ISC Department Manager.

7.2.3 Information regarding the Hotline and its purpose will be maintained on the FPC-TX Intranet. The Communications Department Director will ensure that this information is maintained and available at all times.

7.2.4 The Communications Department Director will test and/or update Hotlines monthly, or more frequently as necessary to communicate changes in work schedules or other activities required,.

7.3 Emergency/Media Information Center Center (Center) - See General Manager Office Manual, Procedure 33.

7.4 Release of Information to the Public.

7.4.1 Public information related to the incident or severe weather will be developed and delivered by the Communications Department Director. The EOC MIC will develop and deliver messages in the absence of the Communications Department Director. The Formosa Plastics Corporation, U.S.A. (FPC-USA) Corporate Communications Department must be consulted when appropriate.

7.4.1.1 Public information for the Local and Regional Media will be developed by the FPC-TX Communications Department Director.

7.4.1.2 Public information for the National Media will be developed by the FPC-USA Communications Manager.

7.4.2 All Public Information must be approved by the VP/General Manager of FPC-TX prior to being released/delivered to any outside entity. Approval will be considered obtained only after the VP/General Manager has signed the message.

7.4.3 Public Information related to incidents and weather must be developed based on information provided by the EOC MIC.

7.4.4 Frequency of Public Information releases

7.4.4.1 Messages will be updated every 2 hours unless otherwise instructed by the VP/General Manager of FPC TX.

7.4.4 Messages will be sent to outside entities by the Communications Department Director by one of the following Methods: hardline telephone, cell phone, email or social media.

8.0 TRAINING REQUIREMENTS

8.1 None

9.0 FLOW CHARTS

9.1 None

10.0 REFERENCES

10.1 Releasing Company Information – Corporate Communications Procedure #2; FUESJ002

11.0 RECORD RETENTION

11.1 Documented messages must be kept for one (1) year.

12.0 ATTACHMENTS

12.1 None

Date:	Alarm Sent: Yes □ or No □	Time Shift Safety Notified:	Release Number:

Primary Notifications (Emergency \ Non - Emergency)

Agency/Contact to be Notified	Method of Contact/Contact Information		Time	Method of Notification (Check all that apply)				Person Spoken to / Comments
				PH	Fax	Email	Everbridge	
Mike Rivet (All incidents)	Cell	[redacted]		□			□	
Paul Murry (J.P.) (All Incidents)	Cell	[redacted]		□			□	
Fred Neske (Plant Wide, Everbridge confirmation)	Cell	[redacted]		□			□	
Thomas Anderson (Plant Wide, Everbridge confirmation)	Cell	[redacted]		□			□	
Point Comfort Mayor (Stephen Lambden) (Only incidents with possible offsite impacts affecting Point Comfort)	Cell	[redacted]		□			□	
Environmental On Call (All incidents except Medical/Exposure)	Cell	[redacted]		□			□	
CCSO Dispatch (All incidents except Medical/Exposure & Non-RQ)		[redacted]		□			□	
Point Comfort City Hall (All incidents except Medical/Exposure & Non-RQ) during work hours 8AM to 5PM Mon.-Fri.	Office	[redacted]		□			□	
Point Comfort Police Department (Troy Baxter) (Only possible offsite impacts)	Office	[redacted]		□			□	
	Cell	[redacted]		□			□	
Stephanie Schmidt (Fire, Air , Ground, or Water Release)	Cell	[redacted]		□			□	
Justin Iwuala (Fire, Air Release)	Cell	[redacted]		□			□	
Bill Duke (Air, Ground or Water Release)	Cell	[redacted]		□			□	
Laurie Harvey (FPC Injury)	Cell	[redacted]		□			□	
Amy Blanchett (All Incidents)	Cell	[redacted]		□			□	
Matt Brogger (Ground or Water Release)	Cell	[redacted]		□			□	
Shane Burgin (All Incidents)	Cell	[redacted]		□			□	
Kassie Billings (FPC Injury)	Cell	[redacted]		□			□	
David Keller (All Incidents)	Cell	[redacted]		□			□	
Stephen Phillips (All Incidents)	Cell	[redacted]		□			□	
Keith Koudela (All Incidents)	Cell	[redacted]		□			□	
Sammy Grimaldo (All Incidents)	Cell	[redacted]		□			□	
Sue Martinez (All Security & Plant Wide Alarms)	Cell	[redacted]		□			□	
Local Emergency Planning Coordinator (LEPC) (Sectional and Plant Wide Alarms)		[redacted]		□			□	
Justice of the Peace(for worker fatalities at FPC-TX)	Office	[redacted]		□			□	
OSHA (See flow chart located in EOC for reporting requirements)				□			□	

Notifications Made By:	Shift Safety On Duty:

Initial notification must not be delayed pending collection of all information.

Plant wide Alarm / Community Alarm / Land Owner Alarm - Notifications — **Section Applicable YES □ NO □**

Agency/Contact to be Notified	Method of Contact/Contact Information		Time	Method of Notification (Check all that apply)				Person Spoken to / Comments
				PH	Fax	Email	Everbridge	
Activate Everbridge System **(If Incident can be Heard/Seen/Smelled Off-Site)**	**EOC Computer / Everbridge**			□			□	
Point Comfort Alarm System **(Only If Shelter In Place Required)**	**C-7**			□			□	
Land Owner Alarm System (LAS) **(Only If Shelter In Place Required)**	**C-3**			□			□	
Jacob Belicek Jeff Hermes **(Landowner Liaison: Courtesy Call for Plant Wide Alarms or Incidents w/Potential Offsite Impacts)**	Cell	[redacted]		□			□	
Jackson Co. Sheriff/Emergency Mgmt.. Coord.		[redacted]		□			□	
IISD Superintendent (Ross Aschenbeck)	Office	[redacted]		□			□	
		[redacted]		□			□	
	Cell	[redacted]		□			□	

IISD Maintenance Director (Billy Barr)	Office	[redacted]		□			□	
	Cell	[redacted]		□			□	
IISD (Fax IISD Incident Advisory Communications Log)	Fax	[redacted]			□			
CCISD Superintendent (Evan Cardwell)	Office	[redacted]		□			□	
	Cell	[redacted]		□			□	
Port of Port Lavaca-Point Comfort Navigation District (formerly CP&L - Joslin)		[redacted]		□			□	
Alcoa		[redacted]		□			□	
Inteplast		[redacted]		□			□	
Simplot		[redacted]		□			□	
Port Lavaca Police Dept.		[redacted]		□			□	
Air Release (RQ or 30 Minute Unknown Quantity)				**Section Applicable YES □ NO □**				
TCEQ	Email	tceqr14air@tceq.texas.gov			□	□		
Local Emergency Planning Coordinator (LEPC)	Fax	[redacted]			□		Saved in fax machine: Group Upset	
Fred Neske	Email	[redacted]				□		
National Response Center (NRC)	1-800-424-8802			Event #		Contact:		
Chemical Safety and Hazard Investigation Board (CSB) (NRC Event Number will satisfy CSB requirement if called within 30 minutes of NRC Event Reporting)	1-202-261-7600 or report@CSB.gov			Contact:				
EPA (only if NRC notification was initially "unknown" or initial estimates change) This can be done by Environmental Staff at earliest convenience.	1-866-372-7745			□			□	
Ground/Water Release (RQ or 30 Minutes Unknown Quantity)				**Section Applicable YES □ NO □**				
TCEQ / State Emergency Response Commission	1-800-832-8224			□			□	
National Response Center (NRC)	1-800-424-8802			Event #		Contact:		
GLO (Release into Water or if Release Threatens Water, Notify within 1 hour)	1-800-832-8224			□			□	
TPW - (Oil release that affects wildlife)	281-842-8100			□			□	
Wildlife Rehab & Education (Oil release that affects wildlife)	**713-643-9453**			□			□	
Coast Guard (Marine Traffic) (Water Release Only)	361-582-0362			□			□	
	361-533-0087 (24 hr.)			□			□	
ALCOA Env. Manager, Tom Engelgau (Water Releases to Cox Creek only)	[redacted]			□			□	
Fred Neske	Email	[redacted]				□		
Permit Exceedance (Environmental Staff To Make Regular Calls Within 24 Hours)								
Security Threat Notifications								
FBI (Houston Office)	713-693-5000			☐			☐	
Roger Morris (All Cyber Security)	[redacted]			☐			☐	
Bobby Sparkman	[redacted]			☐			☐	
National Response Center (NRC)	1-800-424-8802			Event #		Contact:		
Coast Guard **(Use cell phone if EOC Land line will not connect)**	361-939-0450 (COTP)			☐			☐	
	361-533-0087 (24 hr.)			☐			☐	
FAA Obstruction Lighting Failure or Malfunction (If Light is off for more than 30 minutes)								
FAA Notice To Airmen (NOTAM)	877-487-6867			NOTAM #		Contact:		
CFB Chimney Stack required Information								
Lat: [redacted] **Long:** [redacted] **Height (AGL):** [redacted] **(AMSL):** [redacted] **Nearest Airport: Port Lavaca Distance: 7.54 nm Dir: East**								
EG 2 Wash Tower (BC-115) required information								
Lat: [redacted] **Long:** [redacted] **Height (AGL):** [redacted] **(AMSL):** [redacted] **Nearest Airport: Port Lavaca Distance: 7.54 nm Dir: East**								
EG 2 Regenerator Column (BC-220) required information								
Lat: [redacted] **Long:** [redacted] **Height (AGL):** [redacted] **(AMSL):** [redacted] **Nearest Airport: Port Lavaca Distance: 7.54 nm Dir; East**								
HDPE 3 Product Purge Bin required Information								
Lat: [redacted] **Long:** [redacted] **Height (AGL):** [redacted] **(AMSL):** [redacted] **Nearest Airport: Port Lavaca Distance: 7.54 nm Dir: East**								
Notifications Made By:	Shift Safety On Duty:							

Initial notification must not be delayed pending collection of all information.

FORMOSA PLASTICS CORPORATION, TEXAS
PROCEDURE 37
EMERGENCY NOTIFICATION SYSTEM and ACTIVATION

Revision: 3

1.0 Purpose

The purpose of this procedure is to describe how the Facility Emergency Notification System is setup and activated and on how information is provided by the system under normal conditions and during an emergency.

2.0 Scope

This procedure covers Gas Releases, Spills, Fires, Medical/Rescues, Power Failure, and ASP (Air Separations Plant) Down type alarm activation criteria used to communicate emergency information as quickly as possibly through out the FPC TX, Point Comfort facility.

3.0 Organizations Affected

Any and all FPC-TX Units, Departments, Employees, Contractors, Transporters
and Visitors at the FPC-TX property at 201 Formosa Drive,
Marine Traffic Shore Tank Farm at 1593 South & Matagorda St. in Point Comfort Texas 77978,
Marine Traffic Dock Tank Farm at 1593 South & Diebel Ln. in Point Comfort Texas 77978,
Formosa Hydrocarbons at 103 Fannin Road,
EG-2/CFB Power Plant at 2159 FM1593 South in Point Comfort, Texas 77978,
LLPC at 14368 SH 172 La Ward, Texas 77970.

4.0 Responsibilities

4.1 All employees designated as “authorized employee” within this procedure are responsible to conduct appropriate actions in accordance with this procedure.

4.2 All Department Heads are responsible for implementation of this procedure in their areas of responsibility.

5.0 Definitions

5.1 Alarms Severity – severity is determined by process knowledge, air monitoring, potential offsite impact and any other abnormal conditions that may exist inside the facility that may warrant additional actions.
- 5.1.1 Plant Wide Alarm – Any incident that involves or envelopes more than one units/depts.
- 5.1.2 Section Alarm – Any incident that is confined to the battery limits of the units under an alarm situation.

5.2 Alarm Tones - The system generates three distinct tones and has "Voice Over" capability (Towers Only). A local buzzer sounds at each ENS (Emergency Notification System) unit for a duration of 20 seconds when an alarm is activated using an ENS. Each tone indicates a specific condition as noted below:

SECTIONAL YELP (fast high/low siren, duration 30 sec.)

PLANT WIDE WAIL (slow high/low siren, duration 60 sec.)

ALL CLEAR STEADY TONE (duration 60 sec.)

5.3 Authorized Employee – are those listed below or as designated by the Dept. Management.

	System Location	System Activator
1.	Control Room	Panel board operator or designee
2.	Maintenance Shop	Any Maint Shop employee
3.	Warehouse	Any Warehouse employee
4.	All Laboratory Facilities	Any Laboratory employee
5.	Emergency Operations Center	EOC Staff/Shift Safety Coordinator
6.	Administration Building (101/201)	Any Administration Building employee

5.4 Emergency – An unexpected situation that requires alarm activation and prompt action.

5.5 Emergency Inside Warning System (EIWS) - The individual units use a Gai-Tronics P.A. and/or Page/Party System to provide tone notification to alert unit personnel. The EIWS is activated during plant-wide and during section alarms in the affected unit. For individual units that do not have a Page/Party System a one way-paging microphone has been installed. This allows the Control Room to provide information to personnel within that specific unit via the Gai-Tronics PA system.

5.6 Emergency Notification System (ENS) - Consists of a computer, mouse, keyboard, monitor, UPS back up, alarm software, and a local buzzer. Used for activating Unit Alarms and displaying alarms that has been sent from other units.

5.7 Emergency Outside Warning System (EOWS) - The facility uses a radio-based audible alarm system, which consists of electronic siren towers located throughout the facility. The system can be activated from the unit's ENS, the EOC, the Shift Safety Coordinator or from the dispatch console.

5.8 Facility Emergency Notification System - The System components include (1) Mouse activated Emergency Notification System (ENS) to activate facility wide alarms. (2) Emergency Outside Warning System (EOWS) composed of siren towers. (3) Emergency Inside Warning System (EIWS) composed of Gai-Tronics P.A. and/or Page/Party Systems. (4) Facility Radio System. (5) Manual Alarm System.

5.9 Facility Radio System - The facility radio system is capable of initiating and "All Call", alerting all radio systems and groups simultaneously for emergency notification, instructions during an emergency and incident specific information. The Radio "All Call" is tied into the EIWS for providing coverage to all individuals in areas with an EIWS not just those who carry the Facility Radios. An "All Call" will be issued at the time an alarm is activated and approximately every 30 minutes thereafter during the incident to update the facility of the alarm status.

5.10 Manual Alarm System - Backup system that sounds the affected units EIWS. It does not provide notification to EOC or show up on the ENS screens. For notification of Unit personnel only. To give the alarm units the means of activating an alarm in a unit in the event an alarm cannot be sent from the Unit's ENS node or EOC Command Node.

5.11 Nodes - Alarm and View Nodes - The Emergency Notification System (ENS) has two different types of nodes:

5.11.1 Alarm node - this means that the ENS can initiate and clear alarms for its unit, as well as, view the status of the ENS.
5.11.2 View node - this means that the ENS can only view the status of the ENS

6.0 Key Points

6.1 To provide the steps required for proper operation of the ENS and the backup systems that have been put in place to provide notification of Plant Personnel in the event of an Emergency.

6.2 To ensure the Units/Departments verify proper operations and maintenance of the ENS and backup systems by monitoring the Monday testing and reporting (utilizing attachment 2) the status to ISC the same day.

7.0 Guidelines

7.1 Alarm Status Monitor Use

7.1.1 Once an employee observes an incident*, they must report it at once to the Department or Section in which the event is occurring. Incidents are defined as:

7.1.1.1 Gas Release
7.1.1.2 Spill
7.1.1.3 Fire
7.1.1.4 Medical / Rescue
7.1.1.5 Power Failure
7.1.1.6 ASP Down
7.1.1.7 Test

* The determination to send an alarm is based on process knowledge, visible incidents, air monitoring data and any other abnormal condition that may require alarm activation and prompt action.

7.1.2 Once reported, activation of the system (Section and Plantwide Alarms) must be made through the authorized employee as follows:

System Location	System Activator
1. Control Room	Panel board operator or designee
2. Maintenance Shop	Any employee
3. Warehouse	Any employee
4. All Laboratory Facilities	Any employee
5. Emergency Operations Center	EOC Staff/ Shift Safety Coordinator
6. Administration Building (101/201)	Any employee

The Emergency Notification System uses the ENS as a means of entering the type and severity for sending an alarm. (See Fig. 1 for Screen)

Fig. 1 (Sample Picture)

7.2 Alarm System Activation Steps - In the event of an incident in which the Emergency Notification System needs to be activated, the authorized employee will follow the steps below:

7.2.1 Sending an Alarm

7.2.1.1 Select the Incident Type - Use the mouse to position the cursor over the appropriate incident and left click once. The incident block should blink red.

Note: ASP Down, Power Failure, and Medical Rescue Alarm are both an Incident type and severity combined into one.

7.2.1.2 Select Severity - Use the mouse to position the cursor over the appropriate severity and left click once. The severity block should blink red. Severity is defined as:

7.2.1.2.1 Section Alarm - The incident should be confined to one plant section; the risk of affecting other sections is minimal. Alarm sounds for 30 seconds.

7.2.1.2.2 Plantwide Alarm - The incident could affect the entire facility, but should not exceed the Facility perimeter. Alarm sounds for 60 seconds.

7.2.1.3 Select "Send" - Once the severity block has been selected the "Send" block needs to be left-clicked once. This initiates the appropriate alarm. Alarm Incident type, and severity will blink red until the alarm updates the area view. (See Fig 2) Note: The Alarm is not sent until the "Send" block has been left-clicked once. Note: All steps have to be performed within ten seconds of the first step or the screen will clear all entries. An "All Call" will be issued at the time an alarm is activated and approximately every 30 minutes thereafter during the incident to update the facility of the alarm status.

Fig. 2 (Sample Picture)

7.2.2 Clearing an Alarm

7.2.2.1 Select Clear Alarm - Use the mouse to position the cursor over the "Clear Alarm" block and left click once. The block should blink red.

7.2.2.2 Select Send - Use the mouse to position the cursor over the "Send" block and left click once. The ENS will show normal prior to the All Clear tone being heard.

If there are multiple alarms within the facility including a plant wide alarm the all clear will not sound until the plant wide alarm has been cleared.
Both the Unit Supervisor, and the Shift Safety Coordinator (Incident Commander) must authorize clearing Section Alarms.

In order for Plant Wide Alarms to be cleared, authorization must come from the Shift Safety Coordinator (Incident Commander) and Operations Supervisor.

7.2.3 Clearing a Special Alarm

7.2.3.1 Select the Special Alarm - Use the mouse to position the curser over the special alarm block that needs to be cleared and left click once. The block should blink red.

7.2.3.2 Select Clear Alarm - Use the mouse to position the cursor over the "Clear Alarm" block and left click once. The block should blink red.

7.2.3.3 Select Send - Use the mouse to position the cursor over the "Send" block and left click once. The ENS will show normal prior to the All Clear tone being heard.

7.2.4 Upgrade or Downgrading Alarms

7.2.4.1 Select Incident Type - Use the mouse to select the appropriate incident type.

7.2.4.2 Select Severity - To Upgrade or Downgrade an alarm, the user must left-click once the appropriate change in Severity or Incident type.

7.2.4.3 Select Send - Use the mouse to position the cursor over the "Send" block and left click once. This sequence must be completed within 10 seconds of selecting the first block or the system will return to the original alarm mode.

The decision to upgrade or downgrade should be determined by atmospheric monitoring or visible signs of off-site impact beyond the host unit or FPC-TX property limits. The Shift Safety Coordinator has the authority to send additional Section Alarms in surrounding units as necessary. In some cases odor may require an upgrade depending on chemical, wind direction etc.

Fig. 3 (Sample Picture)

7.3 FACILITY ALARM SIREN & SPEAKER LOCATIONS

7.3.1 Siren Towers:

7.3.1.1 EG-1/ASP (East Side Plant)
7.3.1.2 Central Maintenance Shop (North Side Plant)
7.3.1.3 VCM Plant (Chlorine Unloading Station)
7.3.1.4 Olefins 3 Control Room
7.3.1.5 LDPE

7.3.2 Alarm and View Nodes - The Emergency Notification System (ENS) has two different types of nodes: (1) Alarm- this means that the ENS can initiate and clear alarms for it's unit, as well as, view the status of the ENS. (2) View- this means that the ENS can only view the status of the ENS.

7.4 The Back-up Emergency Notification System

7.4.1 Primary Backup - The Command center located at the EOC will be used to activate the desired alarm(s) in event that the unit is unable to activate their alarm(s). In any type of incident an "All Call" from the dispatch console will be made to inform the facility of the

incident. The Radio "All Call" is being tied into the Each Units Gai-Tronics Sound Systems so that "All Calls" can be heard by individuals working in the Unit that do not have FPC Facility Radios.

7.4.2 Secondary Backup - Manual Alarm System - In the event of both the Primary System and Backup System failure the Host Unit can send the alarm by utilizing the Manual Alarm System Activation. This method is intended as a third redundant system for notification of Personnel within the Unit of an Alarm. This alarm will only sound in the host unit and will not be reflected on the ENS Screens.

7.4.2.1 Before sending a Manual Alarm The Incidents must first be reported by one of the following methods:

7.4.2.1.1 Calling the Dispatcher the 'EMERGENCY' channel (any Zone channel 16) on the Facility Radio System

7.4.2.1.2 Calling Shift Safety Coordinator through the 'EHS1-3' channel (Zone 1 channel 1) on the Facility Radio System

7.4.2.1.3 Phoning the Dispatcher at [redacted] to report the emergency.

7.4.2.2 Activation of Manual Alarm

7.4.2.2.1 The activation of the Manual Alarm System is controlled by a push button box that is located next to the Unit's ENS. The Manual Alarm has the ability to send three different types of alarms: Sectional, Plant Wide and All Clear.

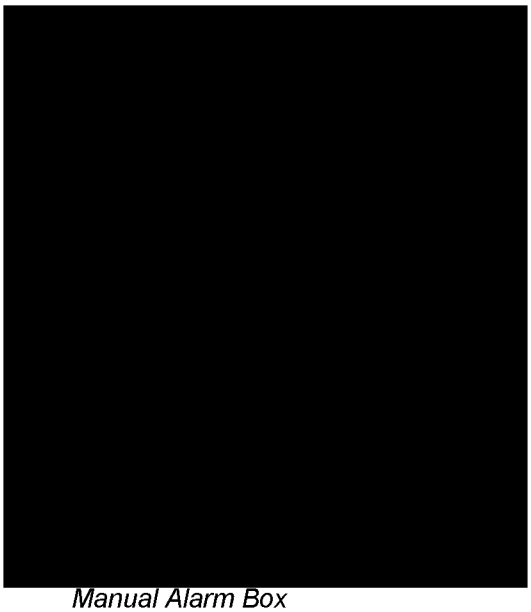
7.4.2.2.2 The Alarm is activated by pushing and releasing the button associated with the alarm that is intended to be sent. (Only the Units speakers will produce the tone.)

7.4.2.2.3 The following color coded buttons are associated with the different alarms (Diagram under Reference Section)

7.4.2.2.3.1 Sectional Alarm – YELLOW

7.4.2.2.3.2 Plant Wide Alarm – RED

7.4.2.2.3.3 All Clear – GREEN



Manual Alarm Box

7.4.2.3 Alarm tone length will be controlled by the Gai-tronics or Page/Party system 30 seconds Sectional or 60 seconds Plant Wide and All Clear depending on the alarm. Note: DO NOT Send another tone until the first one has completed.

7.4.2.4 EHS will first attempt to send the alarm from the Command Node. If the Alarm does not sound in Unit. EHS will authorize the sending of the Manual Alarm as detailed.

7.4.2.5 The Manual Alarm for the Locations in which they are installed will be tested during the scheduled PM for that Unit.

7.4.3 Tertiary Backup - The Shift Safety Coordinator, the Security Dispatcher and the dispatch console have the ability to activate the Facility Siren Towers in the event that the EOC Command center is unable to send out the alarm. This will be done for plant wide. For Section alarms the affected unit should manually activate the EIWS. An "All Call" describing the incident will follow up activation of the alarm. NOTE: In the event that the secondary or Tertiary systems of the Back-up Emergency Notification System are used the alarm(s) will not be reflected on the ENS.

7.5 One way paging from the Control Room to the Field has been added to the Gai-Tronics System in the Units that do not already have Page/Party Systems so that the Control Room can provide instructions to field personnel as a supplemental means of communication or in the event of a Radio Failure.

7.6 The Radio "All Call" system has been tied into the Units Gai-Tronics Sound Systems so that "All Calls" can be heard by individuals working in the Unit that do not have FPC Facility Radios.

This provides an additional means of getting Critical Instructions to Plant Personnel during an Emergency.

7.7 System Redundancy - The Emergency Notification System has a built in redundancy. The ENS communicates by both radio and Ethernet. If either one fails the other takes over. If the system is communicating by radio there may be a delay from when an alarm is sent until it is sounded. This delay is due to radio traffic and should be no more than 60 seconds.

7.8 Monday Testing of the Emergency Notification System

7.8.1 The Emergency Notification System is tested every Monday from 1100 to 1200. (Reference I.S.C document FTMTF040)

7.8.2 All Areas need to monitor their ENS for proper operation during the Monday Testing.

7.8.3 All Areas with a Page/Party or Public Address system need to monitor their speaker systems that are tied to the ENS and report their findings on Attachment 2. **The Completed form shall be sent to ISC by E-mailed to "FTPC Monday Testing" by 14:00 on the day of testing.** If a deficiency is noted on the attachment, the department will issue a "C" work order for the repairs of the system to ISC and notify Shift Safety. This must be done within 15 minutes of the discovery.

7.9 Inspections

7.9.1 Periodically the EH&S department and the ISC department will inspect the ENS to insure that the ENS checks (Attachment 3) and the Monday sound system tests (Attachment 2) are being performed as required by this procedure.

7.9.2 If the ENS checks are not being performed or if the system is abnormal and the department has not taken action to have this system repaired, the EH&S department will issue the department an audit per the EH&S Procedure # 13.

7.10 Troubleshooting

7.10.1 Department personnel are required to monitor the ENS at all times. If the unit's node does not have a green indicator dot in the upper left corner then then the node is on the backup system. (See Figure 4) This condition means that the unit node is not communicating with the Emergency Notification System on the primary network. Contact Shift Safety at [redacted] for Instructions. (PVC L/S is running on the back-up network system as seen below)

Fig. 4 (Sample Picture)

7.11 ENS Check - The Emergency Notification System should be checked for operation once per shift as follows:

7.11.1 Move the mouse and observe the cursor move. If the mouse does not move, contact the Shift Safety Coordinator. If the cursor does move, proceed to the next step.

7.11.2 The next step would be to position the cursor over any Incident and click once. The Incident block should blink red. If the block does not blink red, attempt to click it one more time. If the block still does not blink red, Contact the Shift Safety Coordinator.

7.11.3 After completing the above two steps, click on the corresponding shift block at the top of the screen. This will log the ENS check. (Log this on Attachment 3 ENS check sheet.)

7.12 Help Screen - The system has a built in help screen that provides information on how to initiate alarms, clear alarms and change the status of alarms. To activate the help screen position the mouse cursor over the green question mark block, and left click once. This will bring up the help screen as shown in figure 5.

Fig. 5 (Sample Picture)

7.13 To close the help screen left mouse click on the close block and the ENS will return to the Alarm Status mode.

7.14 Weather Phases - The ENS show's weather phase information. Refer to the help screen for example of weather phase.

7.14.1 Wind Speed and Direction - The ENS shows current wind speed and direction. The direction the wind is coming from is notated on the screen, thus if it shows north the wind is blowing from the north to the south.

7.15 Command Center Message - The Command Center (EOC) can send text message's to each ENS. When this information is sent the ENS node will sound alerting personnel in the area.

Fig. 6 (Sample Picture)

8.0 Training Requirements

8.1 Trainees

8.1.1 Training will be available to all FPC Point Comfort, Texas employees via the training module in Litmos.

8.1.2 It is mandatory that all authorized employees assigned to activate the ENS receive hands on training via the Mobile Training Node once per year.

8.2 Trainers

8.2.1 Shift/Day Supervisors will be responsible for ensuring all Shift Members can activate the ENS. The Managers of each related Department will be responsible for ensuring training is conducted within their Department(s) and scheduling of the use of the ENS Training Node.

8.3 Means of Training:

8.3.1 Yearly Litmos Module – All FPC Employees

8.3.2 Hands on Classroom training on the ENS Training Node – All Authorized Employees

9.0 Flow Charts

9.1 Alarm System Decision Tree - Attachment 1

10.0 References

10.1 I.S.C document FTMTF040 - MONDAY TESTING OF THE PLANTWIDE ALARM PROCEDURE

11.0 Record Retention

11.1 All records generated by following this procedure shall be maintained for a minimum of five years.

12.0 Attachments:

12.1 Alarm System Decision Tree – Attachment 1

12.2 Outdoor Sound System Monitoring – Attachment 2

12.3 Shift ENS log sheet – Attachment 3

Attachment 1

Alarm System Decision Tree

Alarm System Decision Tree

Attachment 2

Outdoor Sound System Monitoring

Monday ENS Testing – Sound System Check

Attachment 3

Shift ENS Log Sheet

Shift ENS Log Sheet

Formosa Plastics

UTILITY-1 EMERGENCY ACTION PLAN

Document Code: FVUU-A001 A.4.2.3-AD Revision: 12 Effective Date: 09/22/2022 Original Issue Date: 05/01/1994	**Administrative / Directive**	Formosa Utilities Administrative Procedures <All>

Table of Contents

1.0 Purpose/Scope

1.1 PURPOSE

This PLAN is specific to the Utility-1 and Utility-3 Department in the event of an Emergency. It is to supplement the Facility Emergency Response Integrated Contingency Plan (ICP). It is the intent of the PLAN to assure that all personnel in any Utility Area are given guidance in an emergency situation.

1.2 SCOPE

This procedure covers the following:

a) Emergency escape guideline and emergency escape route assignments.

b) Assigned safe assembly locations for employees and others present during various types of emergencies.

c) Establish primary and secondary assembly locations and area accountability.

d) Evacuation routes for each area of Utilities Department.

e) Designate essential personnel for the safe shut-down of the Utility areas.

2.0 Organizations Affected

Formosa TX.Utility-1 and Utility-3 Operations Personnel, all permitted workers, visitors and vendors in all Utility areas.

3.0 Responsibilities/Duties

Employees may contact their supervisor, area managers, HSP, or PSM Coordinator for more information about this plan. The Utilities Operations and Department Managers are responsible for:

a) The implementation of this procedure.

b) Insure that all personnel are trained and follow this procedure.

The Utilities Operations Day/Shift Supervisors are responsible for:

a) Insure that all Operations personnel follow this procedure.

b) The accountability of all Utility personnel and visitors.

c) The accountability of all contractors (permitted workers), visitors/un-escorted visitors and any other personnel within the Utilities Unit.

d) Report any **UNACCOUNTED** Formosa personnel, contractors or visitors to the FPC,TX. Emergency Operations Center as soon as possible after any (Utility Section Alarm) or Plant Wide emergency event.

e) Reporting of all emergencies and non-emergencies incidents per, Procedure 3 of the FPC,TX. EH&S Dept.

f) Determine if an area alarm needs to be sent to notify all FPC, TX. of an emergency within the Utility Dept.

g) Making the decision to shelter in place or evacuate during an emergency situation.

4.0 Definitions

Emergency - An enexpected situation that requires prompt action such as a fire, spill, leak, injury, etc.

EAP - Emergency Action Plan.

ENS - Emergency Notification System.

EOC - Emergency Operations Center.

ERT - Emergency Response Team

FPC, TX. Emergency Response ICP - Formosa Plastics Corporation, Texas - Emergency Response, Integrated Contingency Plan.

Essential Personnel - Personnel required for a safe plant shut-down. (see section; PROCEDURE 7.0 = 6.1 Utility Essential Personnel) Trained to operate plant (certified) supervisor and operators.

Non-Essential Personnel - Personnel working or visiting the Utilities Department who are not needed to operate critical plant equipment. These personnel shall shelter-in-place or evacuate after area accountability is complete. Operation staff (Admins,Specialists, HSP, Engineers, Managers)

Note: Utility Tropical Weather Plan Has Essential, Transition Team and Non- Essential A.4.2.2

5.0 Safety and Health Considerations

Key Points of this procedure:

To ensure the safety and health of all perosnnel working or visiting the Utility Department during an emergency.

See FPC,TX EH&S Integrated Contingency Plan; FTESE001

6.0 Tools Required

This procedure and FPC, TX EH&S Intergrated Contingency Plan Procedure; FTESE001

7.0 Procedure

ALL personnel in the Utility Department will be trained on the Emergency Action Plan. New Hire Training and Annual Refresher Training is required. Refresher training will be completed annually during a monthly safety meeting, quarterly refresher training or through the FPC, TX Litmos System.

1.0 **EMERGENCY REPORTING:**
If there is an emergency situation that occurs in any Utility area; notify your supervisor immediately!

Or you can use the following:

1.1 By pushing the orange button on top of the radio and holding it down: This will send an alarm notification to the shift safety and EOC that your have an emergency.

1.1.1 Broadcast of alarms will be via the Emergency Notification System (ENS). ENS terminals are located in each Utility Control Room and in Utilities Administration Building.

1.2 Emergencies can also be reported by the Radio System, Zone 1, Group 1 or dialing [redacted].

2.0 **EMERGENCY NOTIFICATION SYSTEM (ENS):**

The ENS can be monitored (only) from any personal computer at FPC,TX. through the local Intranet network. See the top title [ENS ALARMS]

Each Utility Control Room and Administration Building has the ability to send an alarm on their ENS.

2.1 Alarm Type

2.1.1 Section Alarm – affects only the unit sending the alarm. Conditions of the incident remain within the battery limits of the unit sending the alarm.

2.1.2 Plant Wide Alarm – affects more than one unit. Conditions of the incident have exceeded the battery limits of the unit and affect other units.

2.1.3 Community Wide Alarm – affects areas outside of the Formosa Industrial Complex.

2.2 Incident Types

Fire, Spill, Toxic Gas Release, Power Failure, ASP Status and Medical/Rescue.

2.3 Alarm Tones

2.3 SECTIONAL –**YELP** (fast high/low siren, duration, 30 seconds)
.1 Emergency Situation Exist

2.3 PLANT WIDE – **WAIL** (slow high/low siren, duration 60 seconds) Incident exists that
.2 effects more than one unit.

2.3 COMMUNITY – **WAIL** (Slow high/low siren, duration 90 seconds) Incident exists that
.3 affects areas outside of the facility

2.3 ALL CLEAR – **HORN** (constant steady tone) Incident no longer exists.
.4

2.4 All Call or Voice Over:

Emergency instructions/notification may be broadcast over all radios and intercom systems through the use of an "ALL CALL". Voice messages may also be broadcast over the emergency alarm system to provide additional response information.

3.0 EMERGENCY ALARM TYPES AND ASSEMBLY LOCATIONS:

The following apply:

3.1 Section Alarm (non-Utility Area):

No Action Required, monitor Emergency Notification System (ENS) and Radio System updates. Be aware of the Section Alarm location and the wind direction.

3.2 Section Alarm (Utility Area):

3.2 Personnel operating motor vehicles in the immediate vicinity of the incident will
.1 immediately pull to the side of the road and stop the vehicle and seek refuge.

3.2 Utility Operations personnel will proceed to a Control Room (Primary Assembly
.2 Point) and conduct an Accountability of all employees within the unit or area. This includes all other personnel (Permitted Workers, Non-Permitted Workers, Contractors employees, & visitors) in the Utility Area. All employees where the alarm is initiated should proceed to the designated assembly location and wait for further instructions. Be aware of the wind direction.

3.2 **Primary & Secondary Assembly Location for all personnel accounting:**

.3

3.3 Plant Wide Alarm

Upon the initiation of this alarm, all personnel in the Utility area should first seek refuge and follow the assembly/accountability instructions listed above under Utility Area Section alarm. Be aware of wind direction. Additional instructions will be given by the Department Manager. The Shift Supervisor will be responsible in the absence of the Department Manager. This will occur immediately after accountability has been completed. NOTE: [redacted]

4.0 PERSONNEL ACCOUNTABILITY:

Each Utility personnel shall be accounted for daily. The shift supervisor will account for all shift employees day/night. Upon his first round or initial roll call at the beginning of shift, can be used for shift accountability. The use of the radio system can also be used to communicate accountability & location. Day personnel can use the "marker boards" to indicate their location throughout the day. They may also use the radio system to communicate current locations & accountability.

All permited worker (Contractors), visitors or any other personnel must sign **in and out** on the "Utilities - Unit Accountability Log". Per FPC,TX. EH&S Procedure 42 Accountability - FTESP042 Attachment 1 Accountability Log.

"The Utility Accountability Form A" is only sent to the EH&S Emergency Operations Center if someone is not accounted for. After completion of the form and everyone is accounted for, then await additional instructions from Utility Operations Manager or Shift Supervisor. Keep the completed form in each area folder.

Alarm Situation:

All personnel within the Utility Area – Utility Operational Personnel, staff, permitted workers (contractors), permanent contractors [Testengeer, Taurus, Suez & Nalco], visitors escorted or unescorted visitors all must be accounted for. This occurs when a Utility Section, Plant Wide or Community Alarm is initiated.

Each person working on FPC, TX property is responsible to ensure they are accounted for during and following an emergency! **This measure will be strictly enforced.** If it is determined that someone is unaccoundted for, the Emergency Operations Center (EOC) must be notified at extension [redacted], Security Dispatcher at [redacted], Emergency [redacted] or radio system [redacted] as soon as possible.

4.1 Reporting is required from all assembly/accountability areas. All reporting will be through the Utility-1 (COGEN) Central Control Room by radio ([redacted] or telephone ([redacted]) to the Utility Shift Supervisor or his designee. Utility - 3 is to inform Utility - 1 if someone is unaccounted for.

4.2 The following are responsible for reporting from each assembly/accountability location **"As soon as possible"** to the Utility Shift Supervisor or designee. The total amount of Utility Operations personnel, staff, permanent contracters, permitted workers (contractors) and all escorted visitors in each area. Also, they will relay information to all personnel assembled regarding the incident as instructed:

COGEN Area ([redacted]) – COGEN Board Operator. All Permitted Workers (Contractors)

Water Treatment Building ([redacted]) – Water Treatment Board Operator. All Permitted Workers (Contractors)

CWTP Area ([redacted]) – CWTP Board Operator. All Permitted Workers (Contractors)

UTPC Control building ([redacted]) – UTPC Operator [Permanent Contract Employees - Baker & Nalco] All Permitted Workers (Contractors)

Utility Admin Conferance Room ([redacted]) – PIC or Department Staff [Permanent - Taurus Employees & Visitors]

Utility-3 Area ([redacted] – UT-3 Board Operator. All Permitted Workers (Contractors)

Accountability for Maintenance personnel from the UT Satellite Shop will be reported by the Maintenance Manager.

4.3 **IF SOMEONE IS NOT ACCOUNTED FOR:**

The AREA ACCOUNTABILITY FORM; "APPENDIX A" should be completed and sent or reported to by the Utility-1 Shift Supervisor or designee **"As soon as possible."**

If everyone is accounted for the form does not need to be sent to the Shift Supervisor. Keep the completed form in red folder.

4.4 Personnel unable to reach the designated primary assembly area are responsible for reporting their location to the Utility-1 Shift Supervisor **IMMEDIATELY.** NOTE: This includes personnel who are outside the fence area of the plant, i.e. *FPC, TX. Main Administration Building, EH&S Building or any other location.*

4.5 The Shift Supervisor or designee will report the Utility Department **UNACCOUNTED** status to the EOC at [redacted] – **"As soon as possible".** Report the total employees in all Utility area missing or unaccounted. **Unaccounted personnel should be listed by name and last known location.**

5.0 PLANT-WIDE OR COMMUNITY ALARM EVACUATION ROUTES:

PLANT-WIDE EVACUATION will be given at the directive of the Manager or Supervisor, after accountability procedures are complete. The directive shall be given directly to the person reporting accountability at each assembly location.

5.1 All other Non-Essential Personnel shall be accounted for, before evacuating the unit.

Orders for evacuation may be given to any or all assembly locations in the Utility area. The decision to evacuate should be based on the following minimum criteria: The Unit sending the alarm, wind direction proximity of Utility area(s) from unit sending alarm, nature and severity of alarm or the safety of all employees.

5.2 Evacuation routes will be based on the **Unit sending the alarm** and **wind direction.** If the alarm exists in a Unit or area West of 35th Street (the street running North and South between Utilities COGEN and Olefins-1), non-essential personnel [redacted]

SEE ATTACHED UTILITY EVACUATION ROUTE MAPS - Appendix C

UTPC Area – [redacted]

COGEN Area – [redacted]

Water Treating Area – [redacted]

CWTP Area – [redacted]

Utility ADMIN – [redacted]

Utility-3 – [redacted]

If the alarm exists in a Unit or area East of 35th Street (the street running North and South between Utilities COGEN Area and Olefins- 1), non-essential personnel [redacted]

UTPC Area – [redacted]

COGEN Area – [redacted]

Water Treating Area – [redacted]

CWTP Area – [redacted]

Utility ADMIN – [redacted]

Utility-3 – [redacted]

6.0 UTILITY ESSENTIAL PERSONNEL REQUIRED FOR SAFE SHUT-DOWN:

6.1 Essential personnel are those persons required to maintain a safe operation, facilitate the availability of emergency systems, (i.e. Diesel Firewater pumps, etc.) or bring the plant to a SAFE shutdown if required. Essential personnel [redacted] until Supervisor or Management instructions to evacuate. Essential personnel are:

1. [redacted]
2.
3.
4.
5.
6.
7.

NOTE: above count does not include Utility personnel assigned as ERT members who may have to respond to the incident.

REVIEW OF PROCEDURE EFFECTIVENESS:

1.0 Within 24 Hours of the incident, the Shift Supervisor will report any deficiencies or concerns by completing the CRITIQUE FORM in "APPENDIX B" of this procedure. The form is to be forwarded to the Unit PSM coordinator.

2.0 Deficiencies and concerns will be reviewed by Department Managers & Operation Manager and addressed as needed. Deficiencies should be forwarded to FPC, TX. EH&S for evaluation or for lessons learned.

3.0 The Utility-1 PIC is responsible for updating and issuing revisions to this procedure. All effected personnel are required to be trained on any revisions to this procedure.

BUILDING EVACUATION DRAWING:

"APPENDIX C" contains drawings of each of the Utility Buildings and Plant Evacuation Routes. These drawings are to be posted in each building. These Utility Plant & Evacuation Drawings were revised on: **07/28/22.** Drawing Revision Number: **8** Drawings **1 - 7**.

UT EAP Appendix Form A - A.4.2.3 Rev.10

UT EAP Appendix Form B - A.4.2.3

A.4.2.3-Evacuation Maps & Routes R8 07-29-22

8.0 Training Requirements

Utility Area; All New Hire Employees and Refresher Training in the 4th Quarter Annually.

FPC, TX Site Emergency Procedures - Completed Annually within FPC Litmos System.

9.0 Record Retention

Employee Training is kept for life of employment. All other documents kept for at least one year.

10.0 References

FPC,TX EH&S Intergrated Contingency Plan; FTESE001

FPC,TX EH&S Incident Investigation Procedure; FTESP003

FPC,TX EH&S Accountability Procedure; FTESP042

FPC,TX EH&S Alarm System Activation; FTESP037

FPC,TX EH&S ERT Procedure; FTESP045

Summary of Revisions

Emergency Operations Plan

3.0 Emergency Response Supply Plan

Formosa Utility Venture, Ltd.,
&
Neumin Production Company

March 2023

Table of Contents

1.0 Purpose/Scope

The purpose of this procedure is to provide information concerning the actions required of the CFB employeees in the event that a huricane approaches FPC, TX

2.0 Performance Frequency

2.1 This procedure will be updated annually prior to June 1st.

2.2 Anytime the Formosa Point Comfort, Texas is placed under a hurricane watch.

3.0 Safety and Health Considerations

3.1 SDS Reference

Refer to the SDS Equipment Cross Reference Guide for a listing of the chemicals used in the process equipment in this system. The Corporate SDS Database may be used to refer to properties of and hazards presented by these chemicals.

The Corporate Safe Handling Guidelines are a consolidated source of information on the hazards and protective equipment required to work with various chemicals used in the process or handled outside of the process. These guidelines also contain exposure limits and control measures to be taken if physical contact or airborne exposure occurs.

3.2 PPE Requirements

Below is a list of minimum personal protective equipment (PPE) required in all process areas:

- Approved Hard Hat
- Approved Safety Glasses with side shield
- Approved Hard Toe Footwear.
- Approved Appropriate Hand Protection
- Approved Hearing Protection
- Approved Flame Resistant Clothing

3.3 Cautionary Notes

The Cautionary Notes section is used for general safety cautionary notes, as well as special or unique hazards, relevant throughout the specific job task found in this procedure. N/A indicates that no unique or special hazards have been identified for inclusion in this section. Notes, Cautions, or Warnings relevant to specific sections or steps will be embedded within the procedure, in and around where the hazard is recognized during the specific job task.

If travel must be made through the plant, following a Tropical Storm or Hurricane, use extreme caution; snakes, downed electrical wires, or general debris may be a hazard.

3.4 Safety Systems

Refer to CFB PSI manual

3.5 Environmental

N/A

3.6 Other Considerations

The normal operating ranges are documented in the Log Sheets/Round sheets. The consequences of deviating from the normal operating ranges and the steps to avoid or correct deviations are documented in the Troubleshooting guidelines. The safe upper/lower limits and the health and safety hazards of exceeding the safe upper/lower limits are documented using Attachment 5 of the PSM/RMP Manual Procedure 02 and are part of the process safety information. This process safety information is located in the unit PSI manual.

4.0 Preconditions

Actions to be completed by June 1st

4.1 Update unit Tropical Weather plans and make available to CFB operations employees.

4.2 Update and account for supplies.

4.3 Identify members of Hurricane Strike Team (2 CFB certified operators minimum).

Definitions

4.4 **ESSENTIAL PERSONNEL:**

Per the purpose of implementing the Tropical Weather Plan, Essential Personnel are CFB and Contractor employees required to assist with shutting down (S/D) or starting up (S/U) a unit or an employee required to provide emergency assistance before or after a tropical event. Note: Being required to board up windows, prepare supplies, etc. will constitute essential employment needs.

4.5 **NON - ESSENTIAL PERSONNEL:**

For the purpose of implementing the Tropical Weather Plan, an employee not required for the shutdown (S/D) or startup (S/U) of a unit or to provide emergency assistance before or after a tropical event.

4.6 HURRICANE STRIKE TEAM:

The Hurricane Strike Team is made up of a limited number of ASP2 volunteer employees that will remain on site during or return to the site after a Tropical Storm/Hurricane.

4.7 H-Hour:

The H_Hour (such as H-8 or H-0) represents the number of hours remaining before expected or actual hurricane force winds make landfall at Port O'Connor or the immediate surrounding area.

5.0 Tools Required

The following is a list of required hurricane supplies.

- Weather proof duct tape - 12 Rolls
- Plastic Film - 1 Roll
- 1/4” Rope – 1200 FT
- Flashlights - 10 EA
- Batteries - 48 EA
- Insect Repellant - 12 Cans

6.0 Procedure

6.1

72 Hours Prior to Landfall - Areas of Responsibility

The CFB Plant Operating Manager will inform staff of the impending storm warning,engineers/supervisor responsible for each area will issue instructions for clean up and storage of non permanent fixed equipment.

6.1.1 CFB Engineer

6.1.2 CFB Control Room/Building – Relief Supervisor

6.1.3 The Safety Department must inventory hurricane equipment by June 1st of each year. Reinspection of the hurricane supply list must be made upon instructions from the Complex General Manager that a hurricane is a threat to our area.

6.1.4 Electronic Data backup - Section Staff

6.1.5 Check with CFB volunteer's availability as the hurricane strike team members are notified and send them home to secure their house if needed.

6.2

48 Hours Prior to Landfall

The following is a list of critical items that must be taken care of during hurricane preparation. Area engineers/supervisor will insure that all non permanent fix equipment has been tied down (using Duct tape or rope) or removed from the field and stored in the appropriate location.

6.2.1 Fire extinguishers can be secured tightly to I-beams using duct tape or rope.

6.2.2 SCBA's should be brought into the CFB Bay area, SCBA boxes may be left in the field as long as they are secured with duct tape or rope.

6.2.3 Utility hoses not being used after plant is shutdown can be tied to hose racks.

6.2.4 All temporary scaffolding or ladders are to be disassembled or removed and stored.

6.2.5 Trash cans are to be moved to the CFB Bay area.

6.2.6 Storage drums are to be removed from the Three Day and Empty drum storage areas and stored in a safe location.

6.2.7 All chemical hoses need to be secured to a permanent fixture in the field using rope.

6.2.8 All high pressure gas cylinders are to be secured to cylinder holders using rope.

6.3

Essential Personnel

6.3.1 Per FPC TX Tropical Weather Plan essential personnel are required for the safe shutdown and startup of CFB and emergency assistance before and after a tropical event.

6.3.2 The shift personnel who are scheduled to work will be the essential personnel. If needed, the scheduled off personnel may be requested to come in to assist the on duty shift.

6.3.3 CFB Plant personnel requirements:(Min.)

- [redacted]
- [redacted]
- [redacted]

6.3.4 CFB Operations might hold [redacted] as essential personnel, if additional man power is required to prepare for storm and possible unit shutdown. If the weather and Utility condition allow, the CFB Plant will continue to operate as needed for the Complex until H-8.

6.4

24 Hours Prior to Landfall - Essential Personnel Responsibilities and Required Equipment

6.4.1

- Insure that the CFB Plant continues to run; steam and electricity is vital duringthe EG2, ASP2 & CFB shutdown. The CFB Plant will be shutdown at the H-8.

- Essential personnel will report to work and will be responsible for monitoring of the equipment in the CFB Plant while on hurricane duty.

- Maintain close communications with the EOC, relaying CFB Plant status reports, until evacuated at H-6.

6.4.2 Required Equipment

- Weather proof duct tape
- Rolls Plastic Film - 1 Roll
- 1/4" Rope - 1200 FT
- Flashlights - 10 EA
- Batteries - 48 EA
- Insect Repellant - 12 Cans

6.5

18/6 Hours Prior to Landfall - Shutdown of the CFB Plant as dictated by Complex General Manager.

6.6

6 Hours Prior to Landfall

6.6.1 Depending on weather conditions and instructions from EOC, all essential personnel will be asked to evacuate by H-6.

6.6.2 Hurricane volunteers (2) will stay up to a category 3 hurricane or released by general manager.

6.7

Restart of the CFB Plant after Hurricane Passage

Recall of personnel by telephone Hot line, radio, FPC internet web site and television will be made at the instruction of the FPC EOC (Complex General Manager or Emergency Operations Center).

CFB Management has the phone list for all essential personnel

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6.7.1 **If travel must be made through the plant, use extreme caution; snakes, downed electrical wires, or general debris may be a hazard.**

6.7.2 The designated personnel will assess damage before attempting restart of equipment.

6.7.3 Instructions for start up will be issued once shift personnel have arrived.

6.7.4 Support group personnel shall be notified. (Electrical / Instruments / Maintenance).

6.7.5 Operators will follow CFB start up SOP's. Pre-start up checklists must be completed prior to starting equipment.

7.0 Training Requirements

Training on this procedure is required for all employees under the following conditions:

- Before operating any equipment involved or described in this process or system
- Before operating this process after any changes have been made to the hazards in the process, the technology of the process, or information pertaining to the equipment in the process, and/or
- As a part of refresher training provided at least every three years or more often as necessary.

Also refer to the Formosa Plastics Corporation, TX Process Safety/Risk Management (PSM) Manual, Procedure 5 - TRAINING for additional information.

8.0 Reference

9.0 Attachments

CFB Tropical Weather Checklist Rev. 6

Summary of Revisions

Emergency Operations Plan

4.0 Emergency Response Staffing Plan

Formosa Utility Venture, Ltd.,
&
Neumin Production Company

March 2023

FORMOSA PLASTICS CORPORATION, TEXAS
PROCEDURE 45
EMERGENCY RESPONSE TEAM

Revision Number: 2

FORMOSA PLASTICS CORPORATION, TEXAS
PROCEDURE 45
EMERGENCY RESPONSE TEAM

1.0 PURPOSE

The purpose of this procedure is to provide membership for the Formosa Plastics Corporation Emergency Response Team.

2.0 SCOPE

This procedure applies equally to all FPC Operations, Maintenance and Inventory Control Departments.

3.0 ORGANIZATIONS AFFECTED

Formosa Plastics Corporation, Texas; Formosa Plastics Corporation, America, Formosa Utilities Venture, Ltd.; Neumin Productions; Lavaca Pipeline; Formosa Hydrocarbons; NanYa America; Formosa Material Supply Venture, Ltd.

4.0 RESPONSIBILITY

4.1 Formosa Plastics Corporation, Texas

Formosa will provide training, equipment and personal protective equipment for all Emergency Response Team members with regard to the prerequisites of the Integrated Contingency Plan, OSHA Regulations, NFPA and FPC Policies and procedures.

5.0 DEFINITIONS

5.1 ERT – Emergency Response Team

5.2 EH&S – Environmental, Health and Safety Department

5.3 PPE – Personal Protective Equipment

5.4 Incidents – For the purpose of this procedure, incidents may be defined as Plant-wide Emergencies, Community Emergencies, Sectional Emergencies, Medical or Rescue Emergencies, or any other environmental, health or safety condition requiring one or more ERT members to respond or assist.

5.5 Navigable Waters – As defined in 40 CFR Part 110.1. Includes for the purpose of this procedure, CCND, Upper and Lower Lavaca Bay, Cox Creek, Keller Creek, any of adjoining estuaries, bays or creeks, Lavaca River, FPC-TX OSBL ditches, and any other spill to Navigable Waters in which we are

requested to respond under the Mutual Aid Agreements or which FPC-TX may be defined as a PRP.

5.6 Potential Responsible Party (PRP) – As defined in 40 CFR Part 300.5. For the purpose of this procedure, any incident involving a FPC-TX product, feedstock or waste material in which FPC-TX may be considered responsible for clean-up, mitigation, reclamation or some monetary liability, ERT members may be requested and expected to respond if called upon.

6.0 KEY POINTS

6.1. All ERT members are expected to respond to incidents according to their training, specialty, or classification. There are no exceptions to ERT members responding to an incident unless the ERT member is working in the host unit. Section 7.6 better describes response expectations and job duties of the ERT.

7.0 GUIDELINES

7.1 All Formosa Operations, Maintenance and Warehouse Departments are required to supply manpower for the ERT (Attachment 1).

7.2 The following employees are eligible to serve on the ERT:

7.2.1 All hourly employees

7.2.2 Shift relief operators (pending appropriate Unit Management approval) *

7.2.3 Supervisors (pending appropriate Unit Management approval) *

7.2.4 Other Salaried Employees (pending appropriate Unit Management approval)*

* *These employees are considered ERT members above and beyond the minimum ERT membership.*

7.3 Minimum ERT service shall be five years. Senior members (those members with five years or more service) have first option to remain on the ERT, or retire per paragraph 7.5 of this procedure.

7.4 All ERT positions will be filled on a volunteer basis if possible.

7.4.1 If no volunteers are available, the position/positions shall be filled in the following manner.

7.4.2 Employees with no previous ERT membership will serve first.

7.4.3 If more than one person has no ERT experience, the person with the lowest seniority will serve. (Seniority based on the vacation list)

7.4.4 If all members of a department have been on the ERT, the person who has been off of the team the longest will serve.

7.4.5 Departmental management must approve all ERT assignments.

7.5 Retiring ERT Members will adhere to the following criteria:

7.5.1 Must have served a minimum of five years consecutively.

7.5.2 The Health and Safety Manager must be notified by written resignation at least six (6) months in advance of yearly fire school.

7.5.3 The first four (4) written request(s) received each year (per shift) may retire, but no more than one in any area/department. This is to ensure a smooth transition and minimize impact on department/ shift operations activities, as well as ERT effectiveness.

7.5.4 Each new member must attend yearly fire school. The retiring member remains on the ERT until the new person has successfully completed fire school and any additional training required for a replacement in kind. (i.e. Rescue, Medical, Haz-Mat)

7.5.5 Members retiring due to promotions or transfers to another shift / department / area, must be replaced in kind, regarding the level of specialty training currently held by the retiring member. The Unit / Area / Department replacing the ERT member are responsible for the cost of this training. The EHS department will establish a training schedule. A written notice must be given to the Health and Safety Manager as required in 7.5.2.

7.6 Job Duties

NOTE: The ENS screens located in each unit and/or office area will indicate the type of incident occurring and should be referred to for

determining which ERT personnel are to respond. At times, Shift Safety may use the All-Call system to request initial or additional ERT personnel depending on the circumstances surrounding the incident. If additional ERT members are needed the unit supervisor or his designee must release them to responded.

7.6.1 During all incidents, EOC personnel are expected to respond to assist with reporting information to the regulatory agencies and community. This includes incidents in which a release has occurred (day or night) that may or may not exceed a Reportable Quantity.

7.6.2 During Plant-wide Alarms, all ERT members must respond, except for the Unit involved in the incident.

7.6.3 During all Incidents involving a Sectional Alarm, ERT Officers and Medical personnel shall respond for initial size-up/strategy development and other ERT members must respond as follows:

7.6.3.1 Toxic Gas Release

a. In the event of a Toxic Gas Release, all Haz-Mat ERT members and air monitors in addition to medical and EOC personnel must respond.

7.6.3.2 Fire

a. In the event of a fire, each unit must release all ERT members.

7.6.3.3 Spill

a. In the event of a spill to the ground or concrete, all Haz-Mat personnel in addition to medical, air monitors and EOC personnel shall respond.

7.6.3.4 Power / ASP Down

a. An all-call may be performed by Shift Safety. ERT are not expected to respond unless a secondary emergency were to occur.

7.6.3.5 Medical / Rescue

a. All medical and rescue personnel shall respond along with other ERT members depending on the nature, cause or threat of an emergency.

7.6.4 FPC-TX is a signing member with the Calhoun County, Mutual Aid Agreement. Calhoun County is a signing member with Jackson and Victoria Counties. During Mutual Aid Requests by Calhoun, Jackson, or Victoria Counties, ERT Officers, Medical personnel and other ERT members will be requested and expected to respond based on the nature of the incident.

7.6.5 In the event of a transportation incident off-site involving a railcar, truck or tractor trailer rig, which is carrying a product, feedstock or waste material in behalf of FPC-TX or which FPC-TX may be considered a Potential Responsible Party (PRP), the ERT Officers, Medical Personnel, and Haz-Mat personnel, other ERT members may be requested to assist and expected to respond if called upon.

7.6.6 All responding ERT Members are required to attend an Incident Critique following all incidents. The critique identifies potential problems or concerns during a response and makes recommendations to prevent recurrence.

7.6.7 In all cases, the Shift Safety Coordinator (Incident Commander) will release ERT members to their respective areas of work, at the earliest possible time.

7.7 Equipment

7.7.1 The EH&S Department is responsible for the specifications regarding personal protective equipment for ERT members.

7.7.2 All requests for bunker gear are made by the Unit / Department. Most items are available through the Inventory Control Department. Specialty items may be requested and processed through the Shift Safety Coordinator.

7.7.3 The EH&S Department must approve all deviations to the equipment specification prior to purchase.

7.7.4 All responding ERT members are required to have their bunker gear available and bring it with them to all responses.

7.7.5 Each ERT member is responsible for the accountability, storage and care of his or her assigned PPE.

7.7.6 All defective, worn or damaged equipment must be reported to the Shift Safety Coordinator for repair or replacement of the gear.

7.8 Attendance

7.8.1 ERT performance is considered to be under the category of "and other duties as assigned" in each employee's job description.

7.8.2 If a member is unable to attend their scheduled ERT training due to an excused absence, he/she is responsible to make prior arrangements to attend training with another shift/department. The member will provide a copy of the sign-in roster to his/her shift safety coordinator.

7.8.3 All unexcused absences from scheduled ERT training will be handled according to the FPC-TX Personnel Manual procedures; Administrative Procedures for Attendance; and Overtime.

7.8.4 Whenever an ERT member is absent from his/her regular scheduled shift, that member shall be replaced with an ERT member whenever possible. (Operations only)

7.8.5 The Shift Safety Coordinator will be notified of all replacement ERT members at the beginning of the shift. (Operations only)

7.8.6 Security will call each department/area at the start of each shift for total ERT accountability and will relay the information to Shift Safety.

7.9 PHYSICAL REQUIRMENTS

Each ERT member must complete four tests to gauge physical fitness. The tests will be administered by the Shift Safety Coordinator or designee. The Safety Officer/Medical Officer will measure blood pressure and pulse prior to each test and after each tests. Blood pressure and/or pulse will also be measured any time during the test at the discretion of the Medical Officer. When ambient temperature exceeds 80° F, the tests must be taken at least

30 minutes apart and allow the participant to rest in an air conditioned area.

7.9.1 Test 1 - Ability to open and close a 10" rising stem gate valve

7.9.1.1 Time Allowed: 5 minutes

7.9.1.2 The valve is a 10" rising stem gate valve, permanently mounted on a metal stand, accessible for operation while standing on the ground. The resistance level must be the same for all applicants. The packing will be adjusted according to the resistance level.

7.9.1.3 The test will be considered satisfactorily completed when the applicant has fully opened and fully closed the valve.

7.9.1.4 Station Equipment: Full Bunker Gear and SCBA.

7.9.2 Test 2 - Ability to climb steps carrying a weighted object while wearing self-contained breathing apparatus and full bunker gear.

7.9.2.1 Time Allowed: 5 minutes

7.9.2.2 Climb a structure (height 40') carrying a hand held 20 lb. dry cartridge fire extinguisher (weighted object), while in full bunker gear.

7.9.2.3 The test will be satisfactorily completed when the applicant has successfully climbed to the 40' level with the fire extinguisher. Applicants will be required to carry the fire extinguisher back to the ground level. Applicants will be permitted to rest at each stair landing and deck, if desired. Applicants will be permitted to carry this object in any manner they choose as long as it is done safely and in accordance with the manufacturers' recommendation on the extinguisher. A safe manner of carrying the extinguisher will be demonstrated prior to the actual test.

7.9.2.4 Safety Officer/ Medical Officer will be available at the 1st deck of the structure to assist any applicant who feels he/she cannot successfully complete the test.

7.9.2.5 Station Equipment: Full Bunker Gear and SCBA.

7.9.3 Test 3 - Ability to climb steps while wearing self-contained breathing apparatus and full bunker gear.

7.9.3.1 Time Allowed: 5 minutes

7.9.3.2 Climb to the 40' level of the structure and return to the ground while wearing a Scott Air Pak (35 lbs.) and full bunker gear.

7.9.3.4 There are several flights of steps between each deck. This test will be considered satisfactorily completed when the applicant has successfully climbed to the top of the 40' structure and returned to the ground while wearing a Scott Air Pak.

7.9.3.5 Applicants will receive formal training in the use of the Scott Air Pak prior to the actual test.

7.9.3.6 Safety Officer/ Medical Officer will be available at both the 1st deck (mid) and 2nd deck (top) of the structure to assist any applicant who feels he/she cannot successfully complete the test.

7.9.3.7 Station Equipment: Full Bunker Gear and SCBA.

7.9.4 Test 4 - Ability to wear chemical impervious suit for 5 minute time period

7.9.4.1 Time Requirement: 5 minutes

7.9.4.2 Don the Level A suit and SCBA. Time will begin once the suit is fully donned. The applicant will remain stationary in the standing position for one (1) minute. After the one (1) minute is up the applicant will walk around for the remaining four (4) minutes. The test will be considered satisfactorily completed when the five (5) minute time period has expired.

7.9.4.3 The Safety Officer/ Medical Officer will be present to assist and monitor members.

7.9.4.4 Station Equipment: Level A and SCBA.

7.9.5 The purpose of the following tests is to check the capabilities of the ERT members.

7.9.6 These tests are required to join the Emergency Response Team and will be taken annually to remain on the Emergency Response Team.

7.9.7 The purpose of these tests is to comply with OSHA 1910.156 and NFPA 600, 1081 and keep the team prepared for any situation.

7.9.8 The tests will be required for all firefighting and specialized trained ERT members.

7.9.9 If the ERT member does not pass all tests the member shall retest all tests.

7.9.10 The retest shall be completed within 3 months if the member passed three out of four tests and within 6 months if the member failed two or more tests.

7.9.11 If the member is unable to pass all tests after three attempts, the unit shall replace the individual with a person capable of passing the tests.

8.0 TRAINING REQUIREMENTS

8.1 The EHS Department will provide ERT Training schedules annually.

8.2 Members must attend all mandatory training, which includes: Quarterly training, Annual Fire School, and any/all specialty training assigned.

8.3 Training will be provided by the EHS Department or through the use of outside companies.

8.4 Training is considered a scheduled meeting and should be treated like any other workday.

8.5 Only actual hours attended at training will be eligible for overtime pay. Each unit will approve overtime requisitions. Shift safety will initial all overtime requisitions for confirmation of attendance.

8.6 Each Unit is responsible to cover the following costs.

8.6.1 Training

8.6.2 Travel

8.6.3 Per Diem

8.6.4 Personal Protective Equipment

9.0 FLOW CHARTS

N/A

10.0 REFERENCES

N/A

11.0 RECORD RETENTION

N/A

12.0 ATTACHMENTS

Attachment 1 – Emergency Response Team Membership by Department/ Area

ATTACHMENT 1

Emergency Response Team Membership by Department/ Area

ATTACHMENT 1

Minimum Emergency Response Team Membership

FORMOSA PLASTICS CORPORATION, TEXAS
PROCEDURE 45
EMERGENCY RESPONSE TEAM

Emergency Operations Plan

5.0 Weather-related Hazard Identification Plan

Formosa Utility Venture, Ltd.,
&
Neumin Production Company

March 2023

FORMOSA PLASTICS CORPORATION, TEXAS
PROCEDURE 26
WEATHER PHASES

Revision Number: 4

FORMOSA PLASTICS CORPORATION, TEXAS
PROCEDURE 26
WEATHER PHASES

1.0 PURPOSE

It is the purpose of this procedure to provide guidelines for the protection of personnel and equipment during inclement weather conditions at the Formosa Plastics Corporation, Texas Facilities. The Weather Phase Areas will be divided into two areas: Main Facility and Lolita Area.

2.0 SCOPE

This procedure describes specific responsibilities, duties and requirements for protecting personnel during inclement weather conditions. Formosa utilizes a 3rd party vendor for all weather related notifications. These notifications include: lightning strikes that breach our predetermined boundary, fog, tropical weather, high winds, heat advisory and winter weather conditions for our facility.

3.0 ORGANIZATIONS AFFECTED

Formosa Plastics Corporation, Texas; Formosa Plastics Corporation, America, Formosa Utilities Venture. Ltd; Neumin Productions; Lavaca Pipeline; Formosa Hydrocarbons; NanYa America; Formosa Material Supply Venture, Ltd.; LLPC; Inland Traffic Rail Operations Lolita; Contractors, Visitors or Pick-up/Delivery personnel at these locations.

4.0 DEFINITIONS

4.1 Affected employee

An employee whose job requires them to work in an area that may be subject to inclement weather conditions.

4.2 Authorized employee

A properly trained and qualified person, who through a series of information outlined in this procedure, implements a “Weather Phase” which requires persons to be aware of approaching weather and the requirements of the particular phase.

4.3 Enclosed Grounded Structure

A structure or building that is electrically grounded and covered on all four sides and by a complete roof. The wall covering shall be extended to within 2 to 3 feet of the ground floor or decked floor levels and all the way to the roof line.

4.4 Grounded

Connected metal to metal to a structure with a clamp or other grounding and bonding device, verified by a qualified electrician.

4.5 Grounded Structure

A structure or building that is electrically grounded and or bonded to the earth.

4.6 Hazardous conditions

A Flooded area that hampers ingress and egress, low visibility, high winds, lightning in the immediate area, or other weather conditions that may affect the safety of employees. Lightning is the primary reason that weather phases tend be called for FPC-TX Facility.

4.7 Main Facility

Any Units or Departments located at the main complex area in Point Comfort which will include J7 rail yard on the north side, EG-2 on the south side and all of the areas in between.

4.8 Lolita Area

Any Unit or Departments located in the Lolita Area which will include Lolita Rail Car Repair Shop, Lolita Rail Repair Crew, Lolita Shipping Offices/Rail Yards and LLPC Shipping Warehouse

4.9 Phase I ***(also refer to Section 7.1)***

4.9.1 Lightning: please see attachment 2 for the phase distances of the Formosa Plant Boundary.

4.9.2 Sustained Winds of 28 – 38 miles per hour.

4.9.3 Icy or slippery conditions (Hail & Sleet), which would make working at heights extremely dangerous.

4.10 Phase II ***(also refer to Section 7.1)***

4.10.1 Lightning: please see attachment 2 for the phase distances of the Formosa Plant Boundary.