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Sweeny Cogeneration LLC (RE)

Emergency Operations Plan

Revision 0

Effective Date: 04/18/2022

Prepared by: Gavin Myers **Date:** April 14, 2022

Approved by: Mark Evans **Date:** April 18, 2022

Table of Contents

1.0 Executive Summary

1.1 General

1.1.1 The Phillips 66 Sweeny Cogeneration facility (Sweeny Cogen) is a simple-cycle power plant located entirely in Brazoria County, approximately 2.3 air miles northwest of the town of Sweeny, Texas, within the Sweeny Complex. The Sweeny Complex consists of several facilities owned and operated by Phillips 66 (P66) and Chevron Phillips Chemical Company Limited Partnership (CPChem) located in southern Brazoria County, Texas. These assets are linked by multiple pipelines and operate as a single petrochemical complex. Sweeny Cogen operates four gas turbine / heat recovery steam generators and provides steam and electricity for the operation of the Sweeny Complex, exporting any surplus electricity to the Bulk Electrical System grid via interconnects with Texas New Mexico Power and CenterPoint Energy. Sweeny Cogeneration LLC (RE) does not operate any gas or water production/storage/treatment assets. All required, finished products (fuel gas, process water, potable water) necessary for the operation of Sweeny Cogen are acquired via pipelines from the Sweeny Complex therefore operability of Sweeny Cogen is dependent on the status of the Sweeny Complex.

1.1.2 This Emergency Operations Plan (EOP) outlines how Sweeny Cogen complies with and implements the requirements of the Public Utilities Commission of Texas (PUCT) TAC §25.53. The EOP is a descriptive document that outlines Sweeny Cogen's many emergency and incident response policies and procedures. As an integrated asset within the Sweeny Complex, Sweeny Cogen's EOP utilizes the Sweeny Complex Integrated Contingency Plan (ICP) for incidents requiring emergency response such as fires, spills, hazardous waste releases, gas releases, explosions, utility failures, injuries, medical conditions, confined space\high angle rescues, severe weather, bomb threats, or other physical security issues.

1.1.3 The ICP, which utilizes the standard plan format recommended by the National Response Team's Guidance Document on Integrated Contingency Planning as published in the Federal Register, 61 FR 2 8641, was developed to provide emergency response procedures for the entire Sweeny Complex. The ICP was designed to consolidate emergency planning requirements mandated by Texas Administrative Code and the Code of Federal Regulations. The Incident Management Section of the ICP is based on the National Incident Management System (NIMS).

1.1.4 Senior Management is ultimately responsible for approval, implementation, and activation of the Sweeny Complex ICP and this EOP. An affidavit containing an attestation by the Senior Vice President is included with this filing. Future revisions to the EOP will be accompanied by an additional affidavit.

1.1.5 This plan prescribes emergency response procedures for Sweeny Cogen in accordance with the Sweeny Complex ICP, while it reflects the structure of emergency operating procedures detailed in the PUCT's TAC §25.53.

1.1.6 This plan serves as an emergency management link between Sweeny Cogen, the other facilities within the Sweeny Complex, local municipalities and state government while incorporating the PUCT, TDEM (Texas Division of Emergency Management) and federal (FEMA, etc.) organizational concepts of emergency operations planning.

1.1.7 Sweeny Cogen's EOP employs a functional, all-hazards approach that manages Sweeny Cogen's needs by incorporating seven (7) Annexes This functional approach is basically the same at the local, state, and federal levels. Sweeny Cogen distributes the plan by providing specific instruction to key personnel coupled with providing access to other supportive personnel. This distribution is documented within Sweeny Cogen's site process for providing information and training to its staff. A record of this distribution is included as Table 1 to this EOP.

1.2 Organization

1.2.1 The plan (EOP) is divided into supporting annexes, all are developed, approved, and maintained separately. Each annex refers to several implementing procedures/processes. This allows the specific annexes to contain the appropriate level of detail, organizational review and implementation guidance needed to ensure a more effective response. Annexes are a listing of Supporting Plans that:

1.2.1.1 support this EOP for assignment of responsibilities and operational principles that implement this plan during specific emergencies,

1.2.1.2 because of regulatory requirements or the specific nature of the hazards they address, best stand alone,

1.2.1.3 are published separately, and incorporated into this plan by reference,

1.2.1.4 annexes provide additional information (definitions, explanation of terms, maps, etc.) which will be helpful during emergency response.

1.3 Requirements Matrix

1.3.1 Each Annex included within the Sweeny Cogen EOP has referred to PUCT requirements and associated Sweeny Cogen procedure sections and/or page numbers have been captured in a composite cross-reference included as Enclosure 3 to this EOP.

2.0 Purpose and Scope

2.1 Purpose: This plan is to outline those activities to be taken by Sweeny Cogeneration LLC (RE) to manage and coordinate emergency response activities specific to Sweeny Cogen and to interface when required with the private sector, State of Texas Division of Emergency Management (TDEM), PUCT, ERCOT, and Federal government agencies (FEMA, etc.) in the event of a natural or human-caused event or disaster. This plan serves to satisfy the requirements of the PUCT TAC §25.53. This plan is designed as an "All-Hazards" plan. Its organization into Emergency Operations Plan Annexes allows it to be used for several potential disasters and emergencies.

2.2 Scope: The plan will apply to all emergencies that require Sweeny Cogen response. The plan is to be applied to all personnel and assets of Sweeny Cogeneration LLC (RE) and supporting emergency response organizations.

3.0 Definitions

3.1 Annex – a section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.

3.2 Drill – An operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.

3.3 Emergency – A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.

3.4 EOP – Emergency Operations Plan (PUCT required plan per TAC §25.53)

3.5 Hazard – A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.

3.6 TDEM – Texas Division of Emergency Management

3.7 Threat – the intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.

4.0 Plan Development, Maintenance and Distribution

4.1 Sweeny Cogen's EOP is developed and maintained consistent with the organization's procedure development processes. The Original and all subsequent revisions to the EOP will be maintained within the Sweeny Complex ICP document control process.

4.2 The Sweeny Cogen EOP is reviewed and approved by the onsite Senior Management, including Vice Presidents of Sweeny Cogeneration LLC.

4.3 Maintenance and implementation are the responsibility of the Senior Management.

4.4 Revisions to the Sweeny Cogen EOP are to be approved by the Senior Management (Same as approval).

4.5 The EOP contains an "Approval and Summary of Changes" where the approval accompanied by the date are recorded. This summary page will list all versions of the EOP and will clearly indicate that the most recent version supersedes all others.

4.6 A typical EOP Approval and Summary of Changes page is included as Table 2 to the EOP.

4.7 The EOP is distributed via familiarization training and access provision as detailed in Section 5.0 of this EOP.

5.0 Access/Training and Drills

5.1 Sweeny Complex emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events receive training that is believed to be equivalent to the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training. This includes both technical staff and communications personnel as appropriate to the position.

5.2 Training of Emergency Response Organization personnel is part of a rigorous training program. For Emergency Planning, designated personnel are frequently trained in incident management systems. Additionally, appropriate staff meet during training with external media and others.

5.3 Sweeny Cogen provides key operating personnel with familiarization training on this EOP and provides access to the EOP to other supportive personnel. Key personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate because of specific circumstances during an emergency.

5.4 Training activities are documented within the Phillips 66 Sweeny Refinery's training records process. An example of the information captured is provided as Table 1, "Emergency Operation Plan Distribution Listing" contained within this EOP.

5.5 Sweeny Cogen may conduct multiple tables tops and drills in any given year. Sweeny Cogen will ensure that it conducts at least one drill each calendar year to test its EOP or portions thereof.

5.6 Sweeny Cogen prior to conducting an annual drill will, at least 30 days prior to the date of at least one drill each calendar year, notify commission staff, using the method and form prescribed by commission staff on the commission's website, and the appropriate TDEM District Coordinators, by email or other written form, of the date, time, and location of the drill.

5.7 The Sweeny Complex conducts periodic hurricane drills/table-tops (or actual hurricane response); at least one of these will be documented to meet the annual drill requirement for Sweeny Cogen.

5.8 Following any drill, Sweeny Cogen will capture lessons learned to assess the effectiveness of its emergency response and revise its EOP and supporting processes as needed.

6.0 Staffing

6.1 Sweeny Cogen provides continuous (24 hour/day) operation. Key functions will be maintained throughout an emergency by providing relief of the on-shift personnel and augmenting positions by qualified individuals. The shift rotations may be adjusted during an emergency as dictated by Senior Management.

6.2 Sweeny Cogen's on-shift staffing can perform the actions required by Emergency Operating Procedures (EOP) and those required by the Emergency Plan, without task overlap or overburden.

6.3 In weather related events such as a hurricane, storm crew personnel are activated.

7.0 Communications

7.1 Phillips 66 Communications and Public Affairs Personnel maintain plans and processes regarding the coordination of information with other organizations and the methods and means by which it is released to the media and the public as outlined in the Integrated Contingency Plan.

7.2 Sweeny Cogen has identified specific personnel and their contact information to immediately address urgent requests and questions from the PUCT if needed. This listing is included as Table 3 to this EOP.

7.3 Phillips 66 Sweeny Refinery operations supervision and the designated QSE communicate periodically with the Balancing Authority and Reliability Coordinator (RC) during normal operations and those communications essential to continued operation are expected to continue during an emergency as needed. Coordination with Phillips 66 Communications and Public Affairs Personnel is also expected to occur.

8.0 Concept of Operations

8.1 The concepts address both common operational functions that are relevant across emergency types and annexes that outline the response to specific types of emergencies. It is expected that the appropriate portions of this EOP be implemented when a situation or condition is recognized.

8.2 The Sweeny Cogen concept of operations and overall expectations for event response are as follows:

8.2.1 Recognize and classify the event or emergency:

8.2.1.1 The Integrated Contingency Plan outlines the workflow to classify an event or emergency.

8.2.1.2 The Sweeny Complex utilizes a paid weather monitoring service, StormGeo, for detailed weather forecasts.

8.2.2 Review this EOP's annexes to augment or direct actions as appropriate.

8.2.2.1 The Integrated Contingency Plan provides guidance on external communications appropriate for the specific emergency.

8.2.2.2 For weather-related hazards, Sweeny Cogen will invoke Annex 1," Weather Emergency", Annex 2, "Hurricane", or Annex 3, "Water Shortage" to this EOP (as applicable).

8.2.3 Notify appropriate Sweeny Complex personnel and offsite authorities.

8.2.4 Request additional support from County, State, Federal and private organizations (as needed).

8.2.5 Establish and maintain effective communications with onsite and offsite (local, state, TDEM, PUCT, ERCOT, QSE, FEMA, etc.) entities.

8.2.6 Continuously assess the consequences of the event or emergency, and periodically communicate response status and assessment information to the appropriate groups and authorities.

8.2.7 Take actions onsite and communicate any actions to offsite authorities as defined by the Integrated Contingency Plan.

8.2.8 In conjunction with State and County officials, provide information to the public.

8.2.9 Inform Phillips 66 Executive Leadership of the situation at the site.

8.2.10 Emergency contacts will respond to requests from TDEM, PUCT, ERCOT, OPUC and other regulators or government officials.

8.2.11 Upon request of PUCT Staff during an activation of the State Operations Center by TDEM, Sweeny Cogen Emergency Contacts will provide updates on status of operations, outages, and restoration efforts as applicable.

8.2.11.1 These updates may continue until all incident related outages of customers able to take service are restored or unless notified by PUCT Staff.

8.2.11.2 PUCT Staff may require after action or lessons learned reporting by a date specified by the commission.

8.3 Depending on the situation, Sweeny Cogen will invoke the appropriate Annex/es to the EOP to govern response activities specific to the event at hand.

8.4 The Sweeny Complex has made provisions for necessary emergency response supplies and conducts appropriate inventories and functional checks. Only key supplies are maintained as pre-identified and thereby inventoried and controlled. Hurricanes and declared emergencies are the drivers of these equipment and supply listing (specifics included in appropriate Annex).

9.0 EOP Filing requirements

9.1 Sweeny Cogen must file an executive summary that:

9.1.1 describes the contents and policies contained in the EOP,

9.1.2 includes a reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule,

9.1.3 includes the record of distribution, and is

9.1.4 submitted by affidavit[1].

9.2 Sweeny Cogen must file a complete copy[2] to ERCOT[3] and a redacted copy to PUCT[4].

9.2.1 The initial filing must be completed no later than April 18, 2022.[5]

9.3 Beginning in 2023, Sweeny Cogen must annually update information included in the EOP no later than March 15.

9.3.1 For a change that materially effects how Sweeny Cogen would respond to an emergency, Sweeny Cogen must:

9.3.1.1 file an executive summary that:

a. describes the changes to the contents or policies contained in the EOP,

b. includes an updated reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule,

c. includes the record of distribution, and

d. is submitted under affidavit.

9.3.1.2 file with the commission a complete, revised copy of the EOP with all confidential portions removed, and

9.3.1.3 submit to ERCOT its revised unredacted EOP in its entirety.

9.3.2 If no changes were made to the EOP that materially affects Sweeny Cogen's emergency response, Sweeny Cogen must:

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[1] Contents of the affidavit is detailed in PUCT TAC §25.53 (c)(4)(C).
[2] Contents of the EOP is detailed in PUCT TAC §25.53 (c)
[3] ERCOT will protect the unredacted filing as Protected Information per ERCOT Protocols.
[4] PUCT must be provided with an unredacted copy of the EOP upon request.
[5] Contents of the EOP is detailed in PUCT TAC §25.53 (c)

9.3.2.1 Document any changes made to the list of emergency contacts,

9.3.2.2 provide an attestation from an officer stating that no change to the EOP that materially affects Sweeny Cogen's emergency response had been made, and

9.3.2.3 submit an affidavit documenting the submittal.

9.3.3 Sweeny Cogen will update its EOP if requested by the PUCT.

10.0 Annexes

10.1 Sweeny Cogen has included seven annexes within this EOP. The annexes are to be used to address each specific event or emergency type or classification. The annexes are made up of documents, each with specific implementation requirements, responsibilities, and review and approvals. Additionally, this EOP includes a Sweeny Cogen PUCT Requirements Matrix that can be used to link procedures to specific PUCT requirements. The seven annexes are:

10.1.1 Weather Emergency

10.1.2 Hurricane

10.1.3 Water Shortage

10.1.4 Pandemic/Epidemic

10.1.5 Cyber Security

10.1.6 Physical Security

10.1.7 Restoration

ANNEX 1

WEATHER EMERGENCY

Section	Sub-Section	16 TAC 25.53 Requirement	Procedure/Page	Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(A)	A weather emergency annex that includes: (i) operational plans for responding to a cold or hot weather emergency, distinct from the weather preparations required under §25.55 of this title; (ii) verification of the adequacy and operability of fuel switching equipment, if installed; and (iii) a checklist for generation resource personnel to use during a cold or hot weather emergency response that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.	SW-COGEN-EOP-GEN02 – Cogen Freeze Protection Actions, Pages: Whole Document	Weather Emergency annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(A)	A weather emergency annex that includes: (i) operational plans for responding to a cold or hot weather emergency, distinct from the weather preparations required under §25.55 of this title; (ii) verification of the adequacy and operability of fuel switching equipment, if installed; and (iii) a checklist for generation resource personnel to use during a cold or hot weather emergency response that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.	Cogen Freeze Rounds Logsheet, Pages: Whole Document	Weather Emergency annex

(e) Annexes to be included in the emergency operations plan	(e)(2)(A)	A weather emergency annex that includes: (i) operational plans for responding to a cold or hot weather emergency, distinct from the weather preparations required under §25.55 of this title; (ii) verification of the adequacy and operability of fuel switching equipment, if installed; and (iii) a checklist for generation resource personnel to use during a cold or hot weather emergency response that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.	Severe Weather, Pages: ICP Annex XIII pages 144-145	Weather Emergency annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(A)	A weather emergency annex that includes: (i) operational plans for responding to a cold or hot weather emergency, distinct from the weather preparations required under §25.55 of this title; (ii) verification of the adequacy and operability of fuel switching equipment, if installed; and (iii) a checklist for generation resource personnel to use during a cold or hot weather emergency response that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.	SW-COGEN-EOP-GEN03 – Cogen Hot Weather Actions, Pages: Whole Document	Weather Emergency annex

ANNEX 2

HURRICANE

Section	Sub-Section	16 TAC 25.53 Requirement	Procedure/Page	Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(E)	A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;	Emergency Response Plan - Hurricane Plan (PRIVATE & CONFIDENTIAL), Pages: Whole Document	Hurricane annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(E)	A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;	Hurricane Plan Core Plan, Pages: ICP Annex XV pages 147-156	Hurricane annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(E)	A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;	Hurricane Preparation List, Pages: ICP Annex XVI pages 157-158	Hurricane annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(E)	A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;	Personal Hurricane Plan, Pages: ICP Annex XVIII pages 159-160	Hurricane annex

ANNEX 3

WATER SHORTAGE

Section	Sub-Section	16 TAC 25.53 Requirement	Procedure/Page	Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(B)	A water shortage annex that addresses supply shortages of water used in the generation of electricity;	SWE-RWT-NOP-SBR01 Raw Water Inventory Management Plan (PRIVATE & CONFIDENTIAL), Pages: Whole Document	Water shortage annex

ANNEX 4

PANDEMIC/EPIDEMIC

Section	Sub-Section	16 TAC 25.53 Requirement	Procedure/Page	Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(D)	A pandemic and epidemic annex;	Sweeny Refinery Pandemic Plan (2020) V4 (PRIVATE & CONFIDENTIAL), pages: Whole Document	Pandemic and epidemic annex

ANNEX 5

CYBER SECURITY

Section	Sub-Section	16 TAC 25.53 Requirement	Procedure/Page	Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(F)	A cyber security annex;	O-33-BP-01 Industrial Control Systems Cyber Security Incident Response Process, Pages: Whole Document	Cyber security annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(F)	A cyber security annex;	ICP-GOV-09 Cyber Security Incident Response and CIP Exceptional Circumstances, Pages: Whole Document	Cyber security annex

ANNEX 6

PHYSICAL SECURITY

Section	Sub-Section	16 TAC 25.53 Requirement	Procedure/Page	Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(G)	A physical security incident annex; and	Bomb Threat Procedure, Pages: ICP Annex IV pages 100-107	Physical security incident annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(G)	A physical security incident annex; and	Prevention, Pages: ICP Annex IX page 137	Physical security incident annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(G)	A physical security incident annex; and	ICP-GOV-09 Cyber Security Incident Response and CIP Exceptional Circumstances, Pages: Whole Document	Physical security incident annex

ANNEX 7

RESTORATION

Section	Sub-Section	16 TAC 25.53 Requirement	Procedure/Page	Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(C)	A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;	Core Plan Establish Objectives & Priorities, Pages: ICP pages 52-54	A restoration of service annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(C)	A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;	Debrief & Critique Guidelines, Pages: ICP Annex I pages 90-92	A restoration of service annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(C)	A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;	Power Restoration Priority List, Pages: Hurricane Plan Attachment 10.019	A restoration of service annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(C)	A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;	Startup Sequence, Pages: Hurricane Plan Attachment 10.020	A restoration of service annex

TABLE 1

EMERGENCY OPERATION PLAN DISTRIBUTION LISTING

(TYPICAL)

Emergency Operation Plan Distribution Listing

	Title	Name	OPERATING PERSONNEL[6] (YES/NO)	Date Access Provided	Date Trained
1	General Manager	Mark Evans	NO	4/18/22	
2	HSE Manager	Ben Way	NO	4/18/22	
3	Emergency Response Team Leader	Ronnie Thompson	NO	4/18/22	
4	Operations Manager	Duncan Crosbie	NO	4/18/22	
5	Production Superintendent	Steve Miller	NO	4/18/22	
6	Shift Superintendents (601s)	Kurt Hankins Dan Turbett Nick Aparicio Max Howell	NO	4/18/22	
7	Business Team Leader	Brett Walczak	NO	4/18/22	
8	Utilities Operations Supervisor	Gavin Myers	NO	4/18/22	
9	Utilities Shift Leaders	Brett Boenisch Joe Trevino Jon Wilhelm David Pena	YES	4/18/22	
10	Cogen Console Operators	Mike Luera Thanh Nguyen Gary White Chris Goodson Will Sanders Max Carrion Clayton Arlitt Justin Burney	YES	4/18/22	

[6] Operating personnel should be familiar with and have received training on applicable contents of the EOP and instructed to follow applicable portions except to the extent deviations are appropriate because of specific circumstances during an emergency.

TABLE 2

APPROVAL AND SUMMARY OF CHANGES

CHANGE NUMBER	PREPARED BY	DATE OF CHANGE	SUMMARY OF CHANGE	APPROVAL SIGNATURE[7]	DATE APPROVED
0	Gavin Myers	4/14/22	Initial Plan to meet revised PUCT TAC §25.53	Per Filing Affidavit	4/18/22

7 *This Signature Constitutes Approval and attests that this change supersedes previous versions of the EOP.

TABLE 3

EMERGENCY OPERATION PLAN CONTACT LISTING

(TYPICAL)

	Title	Name	PUCT Responder[8] (YES/NO)	Contact Information	Primary (P)	Backup (B)
1	Business Team Leader, AR	Brett Walczak	YES	248-770-0064	X	
2	Operations Supervisor, Backup AR	Gavin Myers	YES	346-347-0538		X
3	Emergency Response Team Leader	Ronnie Thompson	YES	346-274-0617		X
4	Production Superintendent	Steve Miller	YES	979-248-9811		X
5	Operations Manager, VP	Duncan Crosbie	YES	806-274-0063		X

[8] This contact information is for the individuals who can immediately address urgent requests from the PUCT during an emergency.

STATE OF TEXAS §
§
COUNTY OF _____ §

AFFIDAVIT OF _____

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

1. My name is [___], and I am the [title] of Sweeny Cogeneration LLC ("Sweeny Cogen"). Sweeny Cogen is a registered power generation company. I have personal knowledge of the facts stated in this affidavit and they are true and correct.

2. I am familiar with Sweeny's Emergency Operations Plan ("EOP") and the executive summary of the EOP being filed with the Public Utility Commission of Texas in accordance with 16 Tex. Admin. Code § 25.53.

3. All relevant operating personnel at Sweeny are familiar with the applicable contents and execution of the EOP and will receive the appropriate training, and such personnel have been instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate because of specific circumstances during the course of an emergency.

4. The EOP has been reviewed and approved by the appropriate executives.

5. Sweeny will conduct or participate in at least one drill each calendar year to test its EOP. At least one of the annual drills will include a test of its hurricane annex.

6. The EOP or an appropriate summary has been distributed to local jurisdictions as needed.

7. Sweeny maintains response procedures that address business continuity and returning to normal operations after disruptions caused by an incident.

8. Sweeny 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.

_____
[signatory name].

SUBSCRIBED AND SWORN TO BEFORE ME ON THIS _____ OF April, 2022.

_____
Notary Public in and for the State of Texas

ENLCOSURE 2

ATTESTATION EXAMPLE

ATTESTATION OF ANNUAL REVIEW

This EOP has been reviewed by the Sweeny Cogeneration LLC Management.

In the previous calendar year of XXXX, Sweeny Cogen did not make a change to its EOP that materially affects how the entity would respond to an emergency.

Additionally, no changes to the list of emergency contacts have been made.

I _____ attest that the above statements are true to the best of my knowledge.

Title:
Name:
Signature:

THIS DOCUMENT AND AN AFFIDAVIT MUST BE FILED WITH THE PUCT BY MARCH 15 OF EACH YEAR COMMENCING IN 2023.

NOTE: An Affidavit is also required to be submitted to the PUCT.

ENCLOSURE 3

Sweeny Cogen PUCT REQUIREMENTS MATRIX

Section	Sub-Section	16 TAC 25.53 Requirement	Procedure/Page	Annex
(c) Filing Requirements	(c)(1)	An entity must file an emergency operations plan (EOP) and executive summary under this section by April 15, 2022.	Sweeny Cogen Emergency Operations Plan, Page 8, Section 9.2.	
(c) Filing Requirements	(c)(1)(A)(i)	An entity must file with the commission: an executive summary that: (a) describes the contents and policies contained in the EOP; (b) includes a reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule; (c) includes the record of distribution required under subparagraph (c)(4)(A) of this section; and (d) contains the affidavit required under subparagraph (c)(4)(C) of this section.	Sweeny Cogen Emergency Operations Plan: (a) Page 3, Section 1.0 (b) Page 3, Section 1.0 (c) Page 3, Section 1.1.7 (d) Page 29, Enclosure 1.1.4	
(c) Filing Requirements	(c)(1)(A)(ii)	A complete copy of the EOP with all confidential portions removed.	Sweeny Cogen Emergency Operations Plan, Page 9, Section 9.3.1.2.	
(c) Filing Requirements	(c)(1)(B)	For an entity with operations within the ERCOT power region, the entity must submit its unredacted EOP in its entirety to ERCOT.	Sweeny Cogen Emergency Operations Plan, Page 9, Section 9.3.1.3.	
(c) Filing Requirements	(c)(1)(D)	An entity must make its unredacted EOP available in its entirety to commission staff on request at a location designated by commission staff.	Sweeny Cogen Emergency Operations Plan, Page 9, Section 9.2.	
(c) Filing Requirements	(c)(3)	An entity must continuously maintain its EOP. Beginning in 2023, an entity must annually update information included in its EOP no later than March 15 under the following circumstances:	Sweeny Cogen Emergency Operations Plan, Page 9, Section 9.3.	

(c) Filing Requirements	(c)(3)(A)	An entity that in the previous calendar year made a change to its EOP that materially affects how the entity would respond to an emergency must: (i) file with the commission an executive summary that: (a) describes the changes to the contents or policies contained in the EOP; (b) includes an updated reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule; (c) includes the record of distribution required under subparagraph (c)(4)(A) of this section; and (d) contains the affidavit required under subparagraph (c)(4)(C) of this section. (ii) file with the commission a complete, revised copy of the EOP with all confidential portions removed; and (iii) submit to ERCOT its revised unredacted EOP in its entirety if the entity operates within the ERCOT power region.	Sweeny Cogen Emergency Operations Plan, Page 3, Section 1.0.	

(c) Filing Requirements	(c)(3)(B)	An entity that in the previous calendar year did not make a change to its EOP that materially affects how the entity would respond to an emergency must file with the commission: (i) a pleading that documents any changes to the list of emergency contacts as provided under subparagraph (c)(4)(B) of this section; (ii) an attestation from the entity's highest-ranking representative, official, or officer with binding authority over the entity stating the entity did not make a change to its EOP that materially affects how the entity would respond to an emergency; and (iii) the affidavit described under subparagraph (c)(4)(C) of this section.	(i) Sweeny Cogen Emergency Operations Plan, Page 27, Table 2, Approval and Summary of Changes. (ii) Sweeny Cogen Emergency Operations Plan, Page 30, Enclosure 2, Attestation Example. (iii) Sweeny Cogen Emergency Operations Plan, Page 29, Enclosure 1, Affidavit Example.	
(c) Filing Requirements	(c)(3)(C)	An entity must update its EOP, or other documents required under this section if commission staff determines that the entity's EOP or other documents do not contain sufficient information to determine whether the entity can provide adequate electric service through an emergency. If directed by commission staff, the entity must file its revised EOP or other documentation, or a portion thereof, with the commission and, for entities with operations in the ERCOT power region, with ERCOT.	Sweeny Cogen Emergency Operations Plan, Page 9, Section 9.3.1.2 and 9.3.1.3.	
(c) Filing Requirements	(c)(3)(E)	An entity must make a revised unredacted EOP available in its entirety to commission staff on request at a location designated by commission staff.	Sweeny Cogen Emergency Operations Plan, Page 9, Section 9.2.	
(c) Filing Requirements	(c)(4)	In accordance with the deadlines prescribed by paragraphs (1) and (3) of this subsection, an entity must file with the commission the following documents:		

(c) Filing Requirements	(c)(4)(A)	A record of distribution that contains the following information in table format: (i) titles and names of persons in the entity's organization receiving access to and training on the EOP; and (ii) dates of access to or training on the EOP, as appropriate.	Sweeny Cogen Emergency Operations Plan, Page 6, Section 5.0. Sweeny Cogen Emergency Operations Plan, Page 26, Table 1, Emergency Operation Plan Contact Listing.	
(c) Filing Requirements	(c)(4)(B)	A list of primary and, if possible, backup emergency contacts for the entity, including identification of specific individuals who can immediately address urgent requests and questions from the commission during an emergency.	Sweeny Cogen Emergency Operations Plan, Page 28, Table 3, Emergency Operation Plan Contact Listing.	
(c) Filing Requirements	(c)(4)(C)	An affidavit from the entity's highest-ranking representative, official, or officer with binding authority over the entity affirming the following: (i) relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and 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; (ii) the EOP has been reviewed and approved by the appropriate executives; (iii) drills have been conducted to the extent required by subsection (f) of this section; (iv) the EOP or an appropriate summary has been distributed to local jurisdictions as needed; (v) the entity maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and (vi) the entity'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,	Sweeny Cogen Emergency Operations Plan, Page 29, Enclosure 1, Affidavit Example.	

		IS-200, IS-700, and IS-800 National Incident Management System training.		
(d) Information to be included in the emergency operations plan	(d)	An entity's EOP must address both common operational functions that are relevant across emergency types and annexes that outline the entity's response to specific types of emergencies, including those listed in subsection (e) of this section. An EOP may consist of one or multiple documents. Each entity's EOP must include the information identified below, as applicable. If a provision in this section does not apply to an entity, the entity must include in its EOP an explanation of why the provision does not apply.	Sweeny Cogen Emergency Operations Plan, Whole Document Emergency Action Plan, Pages: ICP Core Plan pages 30-45	
(d) Information to be included in the emergency operations plan	(d)(1)	An approval and implementation section that: (A) introduces the EOP and outlines its applicability; (B) lists the individuals responsible for maintaining and implementing the EOP, and those who can change the EOP; (C) provides a revision control summary that lists the dates of each change made to the EOP since the initial EOP filing pursuant to paragraph (c)(1) of this section; (D) provides a dated statement that the current EOP supersedes previous EOPs; and (E) states the date the EOP was most recently approved by the entity.	Sweeny Cogen Emergency Operations Plan (A) Page 5, Section 2.0. (B) Page 5, Section 4.0 (C) Page 27, Table 2, Approval and Summary of Changes (D) Page 27, Table 2, Approval and Summary of Changes (E) Page 27, Table 2, Approval and Summary of Changes	
(d) Information to be included in the emergency operations plan	(d)(2)	A communication plan	Internal & External Communications, Pages: ICP Core Plan pages 45-50 Sweeny Cogen Emergency Operations Plan, Page 7, Section 7.0.	

(d) Information to be included in the emergency operations plan	(d)(2)(B)	An entity with generation operations must describe the procedures during an emergency for communicating with the media; the commission; OPUC; fuel suppliers; local and state governmental entities, officials, and emergency operations centers, as appropriate in the circumstances for the entity; and the applicable reliability coordinator.	Internal & External Communications, Pages: ICP Core Plan pages 49-50 Sweeny Cogen Emergency Operations Plan, Page 3, Section 1.1.5.	
(d) Information to be included in the emergency operations plan	(d)(3)	A plan to maintain pre-identified supplies for emergency response.	Hurricane Plan (PRIVATE & CONFIDENTIAL), Attachment 10.4 Logistics Plan Sweeny Cogen Emergency Operations Plan, Page 8, Section 8.4.	Hurricane annex
(d) Information to be included in the emergency operations plan	(d)(4)	A plan that addresses staffing during emergency response.	Hurricane Plan (PRIVATE & CONFIDENTIAL), Attachment 10.9 Hurricane Staffing Sweeny Cogen Emergency Operations Plan, Page 7, Section 6.0.	Hurricane annex
(d) Information to be included in the emergency operations plan	(d)(5)	A plan that addresses how an entity identifies weather-related hazards, including tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding, and the process the entity follows to activate the EOP.	Sweeny Cogen Emergency Operations Plan, Page 7, Section 8.2.2.1. Severe Weather, Pages: ICP Annex XIII pages 144-145	Weather Emergency annex

(d) Information to be included in the emergency operations plan	(d)(6)	Each relevant annex, as detailed in subsection (e) of this section and other annexes applicable to an entity.	Sweeny Cogen Emergency Operations Plan, Page 10, Section 10.0.	
(e) Annexes to be included in the emergency operations plan	(e)(2)(A)	A weather emergency annex that includes: (i) operational plans for responding to a cold or hot weather emergency, distinct from the weather preparations required under §25.55 of this title; (ii) verification of the adequacy and operability of fuel switching equipment, if installed; and (iii) a checklist for generation resource personnel to use during a cold or hot weather emergency response that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.	(i) SW-COGEN-EOP-GEN02 – Cogen Freeze Protection Actions, Pages: Whole Document (i) SW-COGEN-EOP-GEN03 – Cogen Hot Weather Actions, Pages: Whole Document (i) Severe Weather, Pages: ICP Annex XIII pages 144-145 (ii)Not applicable, Sweeny Cogen has no fuel switching capability (iii) Cogen Freeze Rounds Logsheet, Pages: Whole Document (iii) SW-COGEN-EOP-GEN03 – Cogen Hot Weather Actions, Pages: Whole Document	Weather Emergency annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(B)	A water shortage annex that addresses supply shortages of water used in the generation of electricity;	SWE-RWT-NOP-SBR01 Raw Water Inventory Management Plan (PRIVATE & CONFIDENTIAL), Pages: Whole Document	Water shortage annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(C)	A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;	Core Plan Establish Objectives & Priorities, Pages: ICP pages 52-54	Restoration annex

(e) Annexes to be included in the emergency operations plan	(e)(2)(D)	A pandemic and epidemic annex;	Sweeny Refinery Pandemic Plan (2020) V4 (PRIVATE & CONFIDENTIAL), pages: Whole Document	Pandemic and epidemic annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(E)	A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;	Hurricane Plan (PRIVATE & CONFIDENTIAL), Pages: Whole Document Hurricane Plan Core Plan, Pages: ICP Annex XV pages 147-156 Hurricane Preparation List, Pages: ICP Annex XVI pages 157-158 Personal Hurricane Plan, Pages: ICP Annex XVIII pages 159-160	Hurricane annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(F)	A cyber security annex;	ICP-GOV-09 Cyber Security Incident Response and CIP Exceptional Circumstances, Pages: Whole Document O-33-BP-01 Industrial Control Systems Cyber Security Incident Response Process, Pages: Whole Document	Cyber security annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(G)	A physical security incident annex; and	ICP-GOV-09 Cyber Security Incident Response and CIP Exceptional Circumstances, Pages: Whole Document Prevention, Pages: ICP Annex IX page 137 Bomb Threat Procedure, Pages: ICP Annex IV pages 100-107	Physical security incident annex

(f) Drills		An entity must conduct or participate in at least one drill each calendar year to test its EOP. Following an annual drill, the entity must assess the effectiveness of its emergency response and revise its EOP as needed. If the entity operates in a hurricane evacuation zone as defined by TDEM, at least one of the annual drills must include a test of its hurricane annex. An entity conducting an annual drill must, at least 30 days prior to the date of at least one drill each calendar year, notify commission staff, using the method and form prescribed by commission staff on the commission's website, and the appropriate TDEM District Coordinators, by email or other written form, of the date, time, and location of the drill. An entity that has activated its EOP in response to an emergency is not required, under this subsection, to conduct or participate in a drill in the calendar year in which the EOP was activated.	Hurricane Plan (PRIVATE & CONFIDENTIAL), Page 15 Sweeny Cogen Emergency Operations Plan, Page 6, Section 5.0. Training, Exercises & Drills, Pages: ICP Annex X pages 143-145	
(g) Reporting requirements		Upon request by commission staff during an activation of the State Operations Center by TDEM, an affected entity must provide updates on the status of operations, outages, and restoration efforts. Updates must continue until all incident-related outages of customers able to take service are restored or unless otherwise notified by commission staff. After an emergency, commission staff may require an affected entity to provide an after action or lessons learned report and file it with the commission by a date specified by commission staff.	Sweeny Cogen Emergency Operations Plan, Page 8, Section 8.2.11.	

STATE OF TEXAS §
§
COUNTY OF Brazoria §

AFFIDAVIT OF Sweeny Cogeneration LLC

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

1. My name is Mark Evans, and I am the Vice President of Sweeny Cogeneration LLC ("Sweeny Cogen"). Sweeny Cogen is a registered power generation company. I have personal knowledge of the facts stated in this affidavit and they are true and correct.

2. I am familiar with Sweeny's Emergency Operations Plan ("EOP") and the executive summary of the EOP being filed with the Public Utility Commission of Texas in accordance with 16 Tex. Admin. Code § 25.53.

3. All relevant operating personnel at Sweeny are familiar with the applicable contents and execution of the EOP and will receive the appropriate training, and such personnel have been instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate because of specific circumstances during the course of an emergency.

4. The EOP has been reviewed and approved by the appropriate executives.

5. Sweeny will conduct or participate in at least one drill each calendar year to tests its EOP. At least one of the annual drills will include a test of its hurricane annex.

6. The EOP or an appropriate summary has been distributed to local jurisdictions as needed.

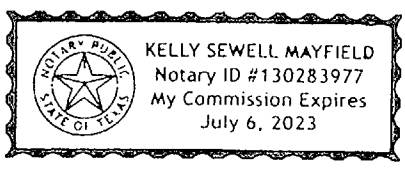
7. Sweeny maintains response procedures that address business continuity and returning to normal operations after disruptions caused by an incident.

8. Sweeny 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.

[signatory name].

SUBSCRIBED AND SWORN TO BEFORE ME ON THIS 18th OF April, 2022.



Kelly Sewell Mayfield
Notary Public in and for the State of Texas

SWEENY COMPLEX

INTEGRATED CONTINGENCY PLAN

Old Ocean, Texas

Sweeny Refinery

Sweeny/Old Ocean Facilities

Key Contacts for Plan Development and Maintenance:

Ronnie Thompson

Emergency Response Team

ADDRESS: 8189 old FM 524
Old Ocean TX 77463

PHONE: (979) 491-2269

Dustin Zingale

CPChem Health & Safety Team

ADDRESS: 21441 Loop 419
Sweeny, TX 77480

PHONE: (979)491-5506

CURRENT REVISION DATE: 01/16/2021

PURPOSE AND SCOPE

This Integrated Contingency Plan (ICP) has been developed to provide emergency response procedures for the Sweeny Complex. The Sweeny Complex consists of several facilities, which are linked by multiple pipelines and operates as a single unit. The Sweeny Complex is defined as the assets owned and operated by Phillips 66 (P66), Chevron Phillips Chemical Company Limited Partnership (CPChem) and Sweeny Cogen Limited Partnership located in southern Brazoria County, Texas.

At the Sweeny Complex a variety of operations occur, these include: petrochemical refining and processing, olefin and polyolefin production, product storage in above ground tanks and underground caverns; loading and unloading of trucks, railcars and railcar storage; loading and unloading of marine vessels; pipeline operations; and electric power generation.

Incidents requiring emergency response may include fire, spills, hazardous waste release, gas release, explosion, utility failure, injury, medical condition, confined space\high angle rescue, severe weather, bomb threat, or security issue.

The Sweeny Complex ICP is designed to consolidate emergency planning requirements for the following regulations:

29 CFR 1910.38 (a) OSHA Emergency Response Plan
29 CFR 1910.119 OSHA Process Safety Management - PSM
29 CFR 1910.120 OSHA HAZWOPER
33 CFR Part 154, subpart F USCG Facility Response Plan - OPA
40 CFR Part 68 Risk Management Program – RMP
40 CFR Part 112.7 EPA – SPCC
40 CFR Part 112.7(d) and 112.20-21 EPA Facility Response Plan – OPA
40 CFR Part 265, subpart C & D 40 CFR 279.52 – RCRA
49 CFR Part 192, DOT Transportation of Natural Gas & Other Gas By Pipeline
49 CFR Part 194 RSPA Pipeline Response Plan
49 CFR Part 195, DOT Transportation of Hazardous Liquids by Pipeline
16 TAC Section 7.70-7.73
16 TAC Section 7.80-7.87
31 TAC Chapter 19 TGLO – OSPRA
18 TEXREG 5447 Rule 95 & 97
TRRC: SIT YARD

The Sweeny Complex ICP utilizes the standard plan format recommended by the National Response Team's Guidance Document on Integrated Contingency Planning as published in the Federal Register, 61 FR 2 8641. The Incident Management Section of the Sweeny Complex ICP is based on the National Incident Management System (NIMS).

GENERAL FACILITY INFORMATION

The Sweeny Complex classifies emergencies into four categories: Medical, Level 3, Level 2 and Level 1. They are defined as follows:

MEDICAL EMERGENCY:

A Medical Emergency is an emergency in which only medical responders are requested and there is a single patient for transport. Medical Emergencies may include work-related injuries, as well as personal illness, and require the patient be transported to a local medical facility.

LEVEL 3:

A Level 3 incident is an incident with minor or no impact to the operation of the facility. A Level 3 incident can be managed by the Shift Team with on-site personnel or call-out of the ERT. The incident will not require significant process rate changes to any process unit, has no off-site impact, requires minimal or no repairs to return to normal operations, and will not carry through the current shift.

LEVEL 2:

A Level 2 incident is an incident with medium impact to the operation of the facility and/ or will require additional resources to manage. This incident may require significant process rate changes to single process units, may have off- site impact, or may require additional personnel to make repairs to return to normal operations. The impacts of this incident may carry through more than one shift.

LEVEL 1:

A Level 1 incident is an incident with major impacts that will require all site resources and, possibly, some off-site resources to manage. This incident requires shutting down two or more process units; may have multiple injuries to personnel; requires repairs or assistance from additional personnel to stabilize the Complex; or results in significant off-site impacts. The impacts of this incident will carry through multiple shifts.

GENERAL FACILITY IDENTIFICATION INFORMATION

REFINERY

Facility Name:	Sweeny Refinery
Owner/Operator of Facility:	Phillips 66
Facility Mailing Address:	P.O. Box 866 Sweeny, TX 77480
Facility Physical Address:	Brazoria County, Texas 8189 Old FM 524 Old Ocean, TX 77463
Directions:	Travel State Highway 35. At the intersection of SH 35 and FM 524, turn left on FM 524. Turn right on Old FM 524. Travel .5 miles to the Main Plant Gate.
Facility Phone Number:	(979) 491-2200
Facility Fax Number:	(979) 491-2800
Latitude\Longitude:	29 degrees, 04 minutes, .08 seconds North 95 degrees, 44 minutes, .48 seconds West
Dun & Bradstreet Number:	003913498
EPA ID Number:	TXD 048 210 645
TCEQ Solid Waste Reg. No.:	30048
NPDES Permit:	TX0007536
TPDES Permit:	WQ 0000721
TCEQ Air Acct. No.:	BL-0042-G

SIC Codes:	2911, 2819
Operation Commenced:	1949
Facility Operations:	Refining, processing, tank storage, truck and railcar loading/ unloading, pipeline

CHEMICAL PLANT

Facility Name:	Sweeny Facility
Owner/Operator of Facility:	Chevron Phillips Chemical Company LP
Facility Physical Address:	Brazoria County, Texas 21441 Loop 419 Old Ocean, TX 77463
Directions:	Travel State Highway 35 to the town of Old Ocean. At the intersection of SH 35 and Loop 419, turn left on FM 419. Travel .5 miles and turn left to the Administration building.
Facility Phone Number:	(979) 491-5500
Facility Fax Number:	(979) 491-5522
Latitude\Longitude:	29 degrees, 04 minutes, .08 seconds North 95 degrees, 44 minutes, .48 seconds West
Dun & Bradstreet Number:	07-883-7500
EPA ID Number:	TXR000039834
TCEQ Solid Waste Reg. No.:	86586
TCEQ Air Acct. No.:	BL-0768-C
SIC Codes:	2869
Operation Commenced:	1949
Facility Operations:	Processing, tank storage, pipeline

Polyethylene Unit

Facility Name:	Old Ocean Facility
Owner Operator:	Chevron Phillips Chemical Company, LP
Facility Mailing Address:	P.O. Box 866, Sweeny, Texas 77480
Facility Physical Address:	Brazoria, County, Texas Highway 35, Old Ocean, Texas 77463
Tract Location:	Brazoria County, Texas
Directions:	Travel state highway 35 to the town of Old Ocean. At the intersection of SH 35 and 419, turn left onto route 419. Travel .5 miles and turn left to the Administration building.
Facility Phone Number:	979-491-5500
Facility Fax Number:	979-491-5522
EPA ID Number:	TXD048210645
Latitude\Longitude:	029.04.47 N/95.44.58W
TCEQ Air Permit Number:	103832
NPDES Permit:	TX0135917
SIC Codes:	2821
Operation Commenced Date:	2017
Facility Operations:	Polyethylene production

Rail Operations Facility / SIT Yard

FACILITY NAME: Old Ocean Rail Operations
Facility OWNER OPERATOR: Chevron Phillips Chemical Company, LP
FACILITY PHYSICAL ADDRESS: 25735 SR 35 Old Ocean, TX 77480

TRACK LOCATION: Brazoria County, Texas
Facility Phone Number: 979-491-5500
Facility Fax Number: TBD
TCEQ Permit Number: 103832

SIC Codes: 4013

Operation Commenced Date: 2017

Facility Operations: Rail / SIT Yard

Cogen Facility

Facility Name:	Sweeny Cogen Limited Partnership
Owner/Operator of Facility:	Phillips 66
Facility Mailing Address:	P.O. Box 87 Sweeny, TX 77463
Facility Physical Address:	Brazoria County, Texas 8189 Old FM 524 Old Ocean, TX 77463
Directions:	Travel State Highway 35. At the intersection of SH 35 and FM 524, turn left on FM 524. Turn right on Old FM 524. Travel .5 miles to the Main Plant Gate.
Facility Phone Number:	(979) 491-2200
Facility Fax Number:	(979) 491-2422
Latitude\Longitude:	29 degrees, 04 minutes, 22 seconds North 95 degrees, 44 minutes, 42 seconds West
Dun & Bradstreet Number:	118819478
EPA ID Number:	TXD 988 069 548
TCEQ Air Account. No.:	BL-0622-F
NERC ID Number:	NCR10183
SIC Codes:	4961
Operation Commenced:	1949
Facility Operations:	Steam generation, electric power generation

San Bernard Terminal

Facility Name:	Sweeny Refinery – San Bernard Terminal
Owner/Operator of Facility:	Phillips 66
Facility Mailing Address:	P.O. Box 866 Sweeny, TX 77480
Facility Physical Address:	Brazoria County, Texas CR 372 Sweeny, TX 77480
Directions:	Travel State Highway 35 to the town of Old Ocean. At the intersection of SH 35 and FM 524, turn left on FM 524. Travel 4.5 miles through the town of Sweeny. At the intersection of FM 524 and Avenue A, turn left onto Avenue A. Travel 2.1 miles to San Bernard Terminal.
Facility Phone Number:	(979) 491-2397
Facility Fax Number:	(979) 491-2800
Latitude\Longitude:	29 degrees, 03 minutes, 37.08 seconds North 95 degrees, 40 minutes, 21.8 seconds West
Dun & Bradstreet Number:	003913498
EPA ID Number:	TXD 987 996 550
TCEQ Solid Waste Reg. No.:	39487
NPDES Permit:	TX0007536
TPDES Permit:	WQ 0000721
TCEQ Air Acct. No.:	BL-0339-D

TRCC:	No. 04052 (Operating permit for products pipelines)
TRCC:	No. 04057 (Operating permit for crude pipelines)
SIC Codes:	5171, 4491, 4612, 4613
Operation Commenced:	1949
Facility Operations:	Tank Storage, barge loading/unloading, pipeline
Oil Storage Capacity:	4,869,000 gallons
Oil Transfer Capacity:	4,330 gallons per minute
Total Throughput Capacity	136,435,000 gallons
Average:	
Average Daily Throughput:	374,000 gallons

Chevron Phillips Clemens Terminal

Facility Name:	Sweeny Facility – Clemens Terminal
Owner/Operator of Facility:	Chevron Phillips Chemical Company LP
Facility Physical Address:	Brazoria County, Texas
	2611 CR 314
	Brazoria, TX 77480
Directions:	Travel State Highway 36 through the town of Brazoria
	1.6 miles to the intersection of SH 36 and County Road 310. Turn right on CR 310 and travel 2.0 miles to the intersection of CR 310 and Cr 314. Turn right on CR 314 and travel 0.5 miles to the Clemens Terminal.
Facility Phone Number:	(979) 798-3950
Facility Fax Number:	(979) 798-3956
Latitude\Longitude:	028.59.00N/095.33.30W
EPA ID Number:	TXD 987 996 543
TRRC Reg on Solid Waste:	TXD987996543
NPDES WW Permit:	TX0007587
TCEQ SW Permit:	TXR050000
TNRCC Air Acct. No.:	BL-0044-C
TRCC:	Tidal Disposal No. 00576
TRCC:	Pit Permit No. P008438
TRCC:	Pit Permit No. P008439 A
TRCC:	Pit Permit No. P008439 B

TRCC:	Pit Permit No. P008440 A
TRCC:	Pit Permit No. P008440 B
TRCC:	WW Discharge Permit UHS-005
TCEQ:	Pesticide General Permit TXG870000
SIC Codes:	5171, 4613, 4619, 2869
Operation Commenced:	1956
Facility Operations:	Underground storage (caverns), pipeline
Oil Storage Capacity:	5,000 gallons
Oil Transfer Capacity:	0
Total Throughput Capacity	10,000 gallons
Average Daily Throughput:	30 gallons

Facility Name:	**Sweeny Refinery – Jones Creek Terminal**
Owner/Operator of Facility:	Phillips 66
Facility Mailing Address:	P.O. Box 866 Sweeny, TX 77480
Facility Physical Address:	Brazoria County, Texas 6225 Highway 36 Jones Creek, TX 77541
Directions:	Travel State Highway 36 south through the town of Jones Creek. Approximately 1.5 miles south of Jones Creek turn right and travel 1.5 miles to the Terminal.
Facility Phone Number:	(979) 239-2090
Facility Fax Number:	(979) 239-2757
Latitude\Longitude:	28 degrees, 56 minutes, .28 seconds North 95 degrees, 92 minutes, .05 seconds West
Dun & Bradstreet Number:	003913498
EPA ID Number:	TXD 084 966 639
TCEQ Solid Waste Reg. No.:	33226
NPDES Permit:	TX0007528
TPDES Permit:	WQ-01852
TNRCC Air Acct. No.:	BL-0050-H
SIC Codes:	5171, 4612, 4613
Operation Commenced:	1984
Facility Operations:	Tank storage, pipeline

Oil Storage Capacity:	159,244,000 gallons
Oil Transfer Capacity:	22,400 gallons per minute
Total Throughput Capacity	1,743,868,000 gallons
Average Daily Throughput:	4,778,000 gallons

Facility Name:	**Sweeny Refinery – Freeport Terminal**
Owner/Operator of Facility:	Phillips 66
Facility Mailing Address:	P.O. Box 866 Sweeny, TX 77480
Facility Physical Address:	Brazoria County, Texas CR 731 and FM 1495 or 1000 County Rd. 731 (911) Freeport, TX 77541
Directions:	Travel State Highway 36 to the town of Freeport. Turn right at the intersection of SH 36 and FM 1495 (Pine Street). Travel 0.7 miles on FM 1495 to CR 731. Turn left on CR 731 and travel one mile to Freeport Terminal.
Facility Phone Number:	(979) 239-4190
Facility Fax Number:	(979) 239-2358
Latitude\Longitude:	28 degrees, 55 minutes, .45 seconds North 95 degrees, 20 minutes, .29 seconds West
Dun & Bradstreet Number:	003913498
EPA ID Number:	TXD 988 000 204
TCEQ Solid Waste Reg. No.:	30059
NPDES Permit:	TX0007528
TPDES Permit:	WQ-01852
TNRCC Air Acct. No.:	BL-0041-I
SIC Codes:	5171, 4491, 4612, 4613

Operation Commenced:	1949
Facility Operations:	Marine tanker unloading, barge loading/ unloading, tank storage, pipeline
Oil Storage Capacity:	88,610,000 gallons
Oil Transfer Capacity:	63,000 gallons per minute
Total Throughput Capacity	588,588,000 gallons
Average Daily Throughput:	1,613,000 gallons

Facility Name:	**Sweeny Complex – Pipelines**
Owner/Operator of Facility:	Phillips 66 and Chevron Phillips Chemical Company LP
Facility Mailing Address:	P.O. Box 866
	Sweeny, TX 77480
Facility Physical Address:	Brazoria County, Texas
	8189 Old FM 524
	Old Ocean, TX 77463
Location of Pipelines:	Brazoria County, Texas
Facility Phone Number:	(979) 491-2200
Facility Fax Number:	(979) 491-2800
Texas Railroad Commission	
Permit Numbers:	
Gas Pipelines	T-4 Permit No. 04051
Products Pipelines	T-4 Permit No. 04052
Crude Pipelines	T-4 Permit No. 04057
Phillips Utility Gas	
Company Pipelines	T-4 Permit No. 03065
Hydrogen Pipelines	T-4 Permit No. 05920
SIC Codes:	
Operation Commenced:	1949
Facility Operations:	Pipelines

Key Contact Information

Switch Board – P66 Admin. Bldg:	(979) 491-2200
Switch Board – CPChem Admin. Bldg:	(979) 491-5500
Phillips 66 Shift Superintendent (601):	(979) 491-2384 (Office)
Chevron Phillips Chemicals Shift Superintendent (602):	(979) 491-5776 (Office)
Sweeny Complex Stock Dispatcher:	(979) 491-2206 (979) 491-2389 (Fax)
CAER (Community Awareness and Emergency Response):	(979) 491-2237

INITIAL DISCOVERY & FLOWCHART

The Discovery elements are addressed by the "Initial Discovery" flow chart found at the end of this document.

The Initial Discovery Flow Chart provides the person discovering the incident with guidance on whether to handle the incident themselves or to initiate the appropriate level of response under the Sweeny Complex Emergency Management System. These incidents may include: fire, spills, gas release, and explosion, utility failure, injury, medical condition, confined space/high angle rescue, severe weather, bomb threat, and security threat.

The responsibility of the decision to activate the alarm is at the discretion of the notifying party. The notifying party must also determine what type of incident is being reported, emergency or non-emergency. The primary and secondary alarm systems will be sounded for an emergency incident. The secondary alarm system and/or advisory tone and P. A. of the primary alarm system will be used to communicate a non-emergency incident. An emergency incident is defined as an incident that can impact or affect: personnel safety or health; operations in the reporting or surrounding units; or the community. A non-emergency incident is defined as an incident of a magnitude not impacting or affecting: personnel safety or health; operations in the reporting or surrounding units; or the community. Examples of non-emergency incidents are grass fires, dump/trash fires, and small releases.

The notifying party is defined as the person reporting the incident.

A copy of the notices received from the public and Pipeline procedures are included in this section.

Addendum 1 addresses RCRA Waste Facility Contingency Plan and Emergency Response Procedures required to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the Sweeny Complex Old Ocean, TX for the Phillips 66 Company and Chevron Phillips Chemical Company LP, Hazardous Waste Container Storage Areas.

The "P66 Bomb Threat" procedure and checklist along with the P66 Bomb Threat Call In sheet are found in the Bomb Threat Section of the ICP.

CPChem employees notify 602, (who will notify the manager on duty who is the "single point" of contact for CPChem Global Security), immediately and follow the requirements of Chevron Phillips Global Security Procedures and Guideline EHS-7510, *Bomb Threat Procedure*

ACTIVATION OF ALARM SYSTEM BY PHONE OR RADIO

The plant alarm system may be activated through the plant radio system or by telephone (plant or non-plant extension) by:

- Sweeny Emergencies
  - Dial 2911 from any plant phone
  - Dial 491-2911 from afirtny non-plant phone
  - Depress the phone button on a plant radio

  The plant fire phone rings at the Main Guard Gate, Shift Team Office, Fire Station, and Stock Dispatchers Officer.

- Old Ocean/SIT Yard Emergencies
  - Dial 4737 or 4777 from any plant phone to notify PE Security at the PE Main Gate.

- Freeport Office Building:
  - Dial 911 for any fire or fire alarms at the FOB

Caller should provide the following information:

- Name of person reporting emergency
- Location of emergency
- Type of emergency (fire, release, medical, etc.)
- Additional information such as wind direction, injuries, etc.
- Advise if plant alarm should be sounded
- Resources needed

Upon activation, the plant alarm will sound, providing:

- Type of emergency (fire, gas release, etc.)
- General location of emergency

Additional Information and updates will be broadcast as required.

Emergency Road Closure Support

If an emergency response may require traffic to be stopped on any of the major highways/roadways or should it be necessary to reroute traffic on any of the roads near the facility the Incident Commander (IC) can request Plant Security to initially block the affected roadway/highway and/or request to call 911 asking for assistance from Brazoria County or State to block the affected roadway/highway.

CPChem FIELD ACTIVATION STATIONS

Field activation stations are located throughout the Sweeny/Old Ocean Facilities. These

stations allow for immediate activation of the plant alarm for a fire or gas release. The field activation stations work in the following manner:

Push appropriate button to activate plant alarm system:

- Red for Fire
- Blue for Gas Release

Plant alarm will activate providing the following information on the public-address system:

- Type of Emergency
- General location of Emergency (unit or area)
- Wind direction based on Plant North

When possible, person discovering the emergency should activate 2911 via phone or radiophone with additional information of the emergency.

NON-EMERGENCY INCIDENT

A non-emergency incident is defined as an incident of a magnitude not impacting or affecting: personnel safety or health; operations in the reporting or surrounding units; or the community. Examples of non-emergency incidents are grass fires, dump/trash fires, and small releases.

If a small fire (grass, dumpster, trash, etc.) is discovered:

Make appropriate notifications – these include Phillips 66 Shift Superintendent (601), Chevron Phillips Shift Superintendent (602), Emergency Response Specialist (605), and Stillman/ Lead Operator of the area the incident is occurring in. Notification may be done via radio and/ or 2911 system.

Verify there are no immediate exposures – exposures include personnel, buildings, structures, and equipment

Use extinguishing equipment – if trained to do so, utilize available firefighting equipment to extinguish or contain fire

If a small release is discovered:

Make appropriate notifications – these include 601, 602, 605, and Stillman/ Lead Operator of the area the incident is occurring in. Notification may be done via radio and/ or 2911 system

Identify material – if possible identify the material being release

Isolate area – if possible isolate/ barricade the release location for approximately 100' in all directions

Containment – if trained and properly equipped to do so, utilize available resources to contain and/or stop the release

In all cases personnel safety is the highest priority.

Personnel trained in the use of portable multi-gas sensors shall approach equipment or areas presenting hydrocarbon or toxic concerns from upwind or crosswind assuming that the chemical with the highest personnel exposure concerns, such as Butadiene, Benzene, Chlorine, Hydrogen Sulfide, etc. These trained personnel shall remove people out of areas with potential exposure concerns and sound the alarm if hazardous materials are observed spilling, releasing, or are on fire and to set up barricades accordingly.

Daylight unit operations personal can consult with Personnel Safety, or Shift Superintendent (601/602/605) after business hours to determine levels of PPE needed to establish barricade locations and to further assess expanding or reducing the length of the barricade based on process hazard knowledge.

MEDICAL EMERGENCY AT REMOTE LOCATIONS
For incidents requiring Emergency Medical Services (ambulance) at one of the outlying facilities, the following procedure should be utilized:

CLEMENS TERMINAL
Dial 911

This will activate the West Brazos EMS via the Brazoria Police Department dispatcher

An ambulance will be dispatched to Clemens Terminal as directed by the notifying party

FREEPORT AND JONESCREEK
1) Dial 911

2) This will activate the Freeport Volunteer Fire Department via the Freeport dispatcher

3) An ambulance will be dispatched to the Terminal as directed by the notifying party

SAN BERNARD AND SWEENY BUSINESS OFFICE
1) Dial 911

2) This will activate Sweeny EMS via the Brazoria Police Department dispatcher

3) An ambulance will be dispatched to the location as directed by the notifying party

After contacting EMS, dial 491-2911 and report the emergency to the appropriate personnel. Provide information on actions already taken and any additional resources that may be needed.

All other emergencies are to be r reported via activation of plant alarm system by field activation station or dialing 491-2911.

NOTICES RECEIVED FROM THE PUBLIC

In the event that an employee receives a call from the public, follow the guidelines below:

1) Be courteous, polite and calm.

2) Complete the following questions:
    a. Name of Caller
    b. Phone Number
    c. Incident Location
    d. Type of Incident
    e. Injuries or Fatalities
    f. Assistance Requested

3) Contact appropriate Shift Superintendent immediately to relay information

4) Complete First Report of Incident

The Shift Superintendent will direct the call, or information, as follows:

⇒ Noise, Odor, Smoke, Emergency Response Vehicle traffic or Non-Emergency Inquiries for any of the Sweeny Complex facilities should be directed to:

Normal Hours: CAER (Community Awareness and Emergency Response) Coordinator

Off Hours: Appropriate Environmental Call-Out contact

Note: In the event of five or more calls, the CAER Center should be activated.

⇒ Pipeline Reports should be directed to the Stock Dispatcher.

⇒ Mystery Oil Sheens should be reported to the Shift Superintendent.

The Shift Superintendent will activate the appropriate level of response to emergency reports.

INITIAL DISCOVERY FLOW CHART

The Initial Discovery Flow Chart is a tool to assist a Sweeny Complex worker or visitor should they discover an adverse condition. The individual should utilize the Initial Discovery Flow Chart as outlined in the following:

1. DISCOVER INCIDENT – The individual discovers an adverse condition requiring immediate attention. This may include: fire, explosion, gas release, hazardous materials spill or release, medical emergency, etc.

2. CAN I SAFELY CONTROL INCIDENT? – The individual must determine if they can safely control the incident without additional assistance. This decision will be based on size and type of the incident and knowledge, experience, and capabilities of the individual.
    a. **NO** – Should the employee determine that additional assistance is required; they should **report the emergency.**
    b. **YES** – Should the employee decide that no additional assistance is required, they should determine:

3. CAN OTHERS BE IMPACTED? – Others may be impacted directly or indirectly.
    a. **YES – Report the emergency.**
    b. **NO –** The individual should USE THE INITIAL RESPONSE EQUIPMENT available and within their level of training to mitigate the adverse condition.

4. IS INCIDENT UNDER CONTROL? – The individual should determine if the incident is under control.
    a. **YES –** The individual should NOTIFY SHIFT SUPERINTENDENT & TEAM LEADER AND COMPLETE DOCUMENTATION
    b. **NO – Activate 2911**

5. NOTIFIY SHIFT SUPERINTENDENT AND COMPLETE DOCUMENTATION – The individual should, at minimum, notify the Shift Superintendent of the incident and complete the proper documentation. Other notifications that should be considered are the: unit or area Stillman/ Lead Operator, Specialist; area or production Team Leader, Specialist and individuals Team Leader, Specialist or supervisor.

6. REPORTING EMERGENCIES – If the individual determines they may need more assistance or others may be impacted by the incident, the emergency should be reported as follows:

a. Sweeny
   i. By phone – From a plant extension, dial 2911 – all others should dial 491-2911

   ii. By radio – Use the phone patch to call 2911 or call the Shift Superintendent on Shift Team/Operations channel

   iii. By field activation station – push the appropriate button (red for fire or blue for gas release) on a field activation station – follow-up with a phone call to 2911 or a radio call to the Shift Superintendent on Shift Team/ Operations channel.

b. Old Ocean/SIT Yard
   i. Dial 4737 to notify the PE Main Gate
   ii. Field activation station – red for fire or blue for gas release. Follow-up with phone call to 4737 or radio call to the Shift Superintendent

c. When reporting emergencies by phone or radio, slowly and clearly state:
   i. Type of emergency – this may be a fire, gas release, spill, explosion, medical emergency, etc.

   ii. Location of emergency – provide the unit, area, or building, and where within the unit, area, or building

   iii. Name of person reporting incident – who is calling in the emergency

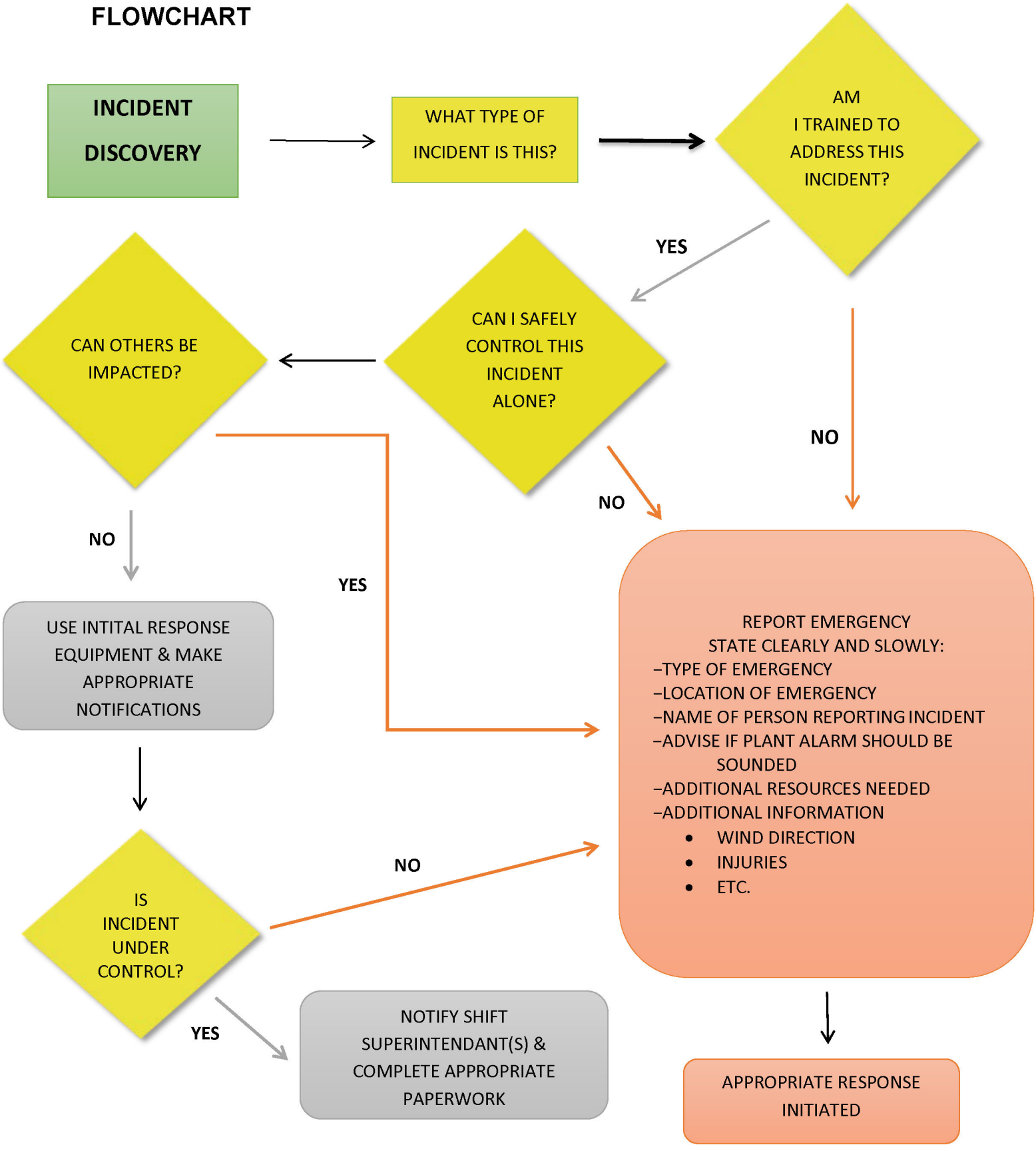
   iv. Advise if plant alarm should be sounded – based on the type and magnitude of the incident, the caller should determine if the plant alarm should be sounded

   v. Additional resources needed – the caller should advise if additional resources such as fire truck, ambulance, and additional personnel are needed to address the incident

   vi. Additional information – the caller should provide any additional information such as wind direction, injuries, recommended approach direction, or any other critical information that could impact the response or the overall incident

   vii. If possible, have personnel stationed to direct emergency traffic and responders to the appropriate location.

FLOWCHART


INCIDENT DISCOVERY
WHAT TYPE OF INCIDENT IS THIS?
AM I TRAINED TO ADDRESS THIS INCIDENT?
YES
NO
CAN I SAFELY CONTROL THIS INCIDENT ALONE?
CAN OTHERS BE IMPACTED?
NO
YES
NO
USE INTITAL RESPONSE EQUIPMENT & MAKE APPROPRIATE NOTIFICATIONS
REPORT EMERGENCY
STATE CLEARLY AND SLOWLY:
–TYPE OF EMERGENCY
–LOCATION OF EMERGENCY
–NAME OF PERSON REPORTING INCIDENT
–ADVISE IF PLANT ALARM SHOULD BE SOUNDED
–ADDITIONAL RESOURCES NEEDED
–ADDITIONAL INFORMATION
• WIND DIRECTION
• INJURIES
• ETC.
IS INCIDENT UNDER CONTROL?
NO
YES
NOTIFY SHIFT SUPERINTENDANT(S) & COMPLETE APPROPRIATE PAPERWORK
APPROPRIATE RESPONSE INITIATED

EMERGENCY ACTION PLAN

1.0 SCOPE

The Emergency Action Plan (EAP) applies to the P66 Sweeny Complex and CPChem Sweeny/Old Ocean Facilities and SIT Yard.

2.0 PURPOSE

The EAP for the Sweeny Complex and Sweeny/Old Ocean Facilities is published to inform personnel of basic emergency information and action plans to protect the health, safety and wellbeing of those that may be in jeopardy. Life safety is of paramount concern to the Sweeny Complex and Sweeny/Old Ocean Facilities management.

3.0 DEFINITIONS

Essential Personnel (CPChem) - Personnel with specific work activities that require them to be in buildings near a hazardous process area for logistical and response purposes. The identification of Essential Personnel will vary with the phase of operation and work activities including normal operation, start-up, and planned shutdown. Examples of Essential Personnel include but are not limited to operators and maintenance personnel.

Incident Commander (IC) – Person responsible for all aspects of an emergency response. The P66 Shift Superintendent (601) is designated as the IC for P66 incidents and the CPChem Shift Superintendent (602) is designated as the Initial Incident Commander, then the Operations Section Chief to the Incident Management Team for CPChem incidents.

Non-Essential Personnel (CPChem) – Personnel without critical job responsibilities requiring them to be near a hazardous process unit. Examples of Non-Essential Personnel include, but are not limited to designers, clerical staff, and administrative support.

Shelter-in-Place (SIP) (CPChem) - A building that affords passive protection during certain emergency scenarios but is not designed to prevent infiltration of contaminated air or withstand overpressure from a blast wave. Generally, an SIP is utilized during the initial response to adverse weather conditions; security issues; off-site emergencies; or, other incidents as directed by the local Incident Command. SIP buildings may serve as an initial assembly point and accounting point for personnel following evacuation from an incident area. See CPChem Global OE Procedure EHS-6110, Building Siting, Attachment B, Shelter-In-Place (SIP) Buildings, for more detailed information on design and construction requirements.

Safe Haven (CPChem) – A fully enclosed building designed and equipped to provide protection to occupants from toxic, flammable, and overpressure hazards. These buildings shall be equipped with toxic and flammable detection, alarm, and control systems designed to notify occupants of deviation(s) above prescribed safe conditions, and to prevent rapid ingress of

toxic or flammable materials. A safe haven may function as a Shelter-in-Place in certain circumstances. Criteria for any building designated or used as a Chevron Phillips Safe Haven are defined in Attachment B – Safe Haven (SIP) Buildings of CPChem Global OE Procedure EHS-6110 Building Siting Procedure.

Save Haven (P66) – Refers to a location/building where essential personnel (e.g., operations personnel) can safely remain to control or shut down operations during a hazardous gas release. Safe havens are designed prevent the infiltration of outside airborne contaminants while occupants are carrying out operational activities.

Hazardous Vapors or Toxic Substance Release – Has the potential to cause physical harm.

HVAC – Building heating, ventilation and air conditioning systems.

4.0 RESPONSIBILITY

P66 Sweeny Complex and CPChem Sweeny/Old Ocean Facilities Management

- Ensure that an Emergency Evacuation and Action Plan exists for the facility.
- Institute emergency loss control operations to protect life, property, and the environment.

Incident Commander

- Quickly develop incident objectives
- Manage all incident operations
- Determine application of resources
- Assume responsibility for all persons involved with the incident

Team Leaders or Specialists – Review and document the review of this plan with each employee at the following times:

a) Initially when the plan is developed.
b) Whenever the employee's responsibilities or designated actions under the plan change.
c) Whenever the plan is changed.

Employees – Act/react prudently to protect the safety, health and wellbeing of themselves and others, as well as preserve the assets of the Complex.

5.0 RALLY/EVACUATION POINTS

5.1 Sweeny/Old Ocean

Rally Points		
Rally Point	**Location**	**Drawing**
#1	Northeast of P66 Administration Building	RBAS-66-VAR-M-000150
#2	CPChem Admin Building Multipurpose Room 209	
#2a	CPChem Admin Extension Lunchroom	
#3	South of CPChem Admin Building & Area G on Tank Farm road	
#4	North gate of center parking lot, east of Transportation.	
#5	West of Gate 2	
#6	East of Lab Building	
#7	South of #4 Warehouse	
#8	Southwest of Unit 30	
#9	Northeast of Cooling Tower 1	
#10	Southeast of Wastewater #2	
#11	East End & High Voltage Shop by Main Gate	
#12	CPChem Visitor Overflow Parking Lot	
#13	East of PE Ground Flare	RBAS-66-VAR-M-000162
#14	South side of PE Unit	
#15	Southwest corner of PE Employee Parking	
#16	Southwest corner of SIT Yard	RBAS-66-VAR-M-000163
#17	Southeast of SIT Rail Car Shop	
#18	South of Unit 47	B-066-VAR-M-000150-22
#19	North of FRAC FIC	B-066-VAR-M-000150-22
#20	At Major Projects area North of Contractor Compound	B-066-VAR-M-000150-22
Evacuation Points		

Evacuation Point	Location	Drawing
A	Recreation Center Parking Area	RBAS-66-VAR-M-000150
B	East End & High Voltage Shop by Main Gate	
C	Southeast WWT #2 Entrance	

5.2 Terminals

5.2.1 Clemens Terminal

Rally Point	Location
#1	North of the Control Room
#2	South of the Control Room
#3	West end of Terminal near Contractor work area
#4	Across the street from RP #3 near the Maintenance BRM

5.2.2 Freeport Terminal

Rally Point	Location
#1	Guard Gate – Main Entrance
#2	Emergency Entrance Gate – Southwest corner of the Tank Farm

5.2.3 Jones Creek Terminal

Rally Point	Location
#1	Terminal East Gate
#2	Terminal West Gate

5.2.4 San Bernard Terminal

Rally Point	Location
#1	Gate G-1 on County Road 371 (Plant West of the Control Room)
#2	East of the Control Room

6.0 SAFE HAVENS & SHELTER-IN-PLACE

6.1 Phillips 66

Location	Inlet Duct Gas Detection	Automatic Inlet Damper Closure	Automatic HVAC Shutdown	Handheld Gas Detector

Central Control Room (CCB)	H_2S, LEL, SO_2, NH_3	Yes	Recirculation of inside air	H_2S, LEL, CO, O_2
Cogen Control Room	No	No	No	H_2S, LEL, CO, O_2
Refinery Tank Farm Control Room	H_2S, LEL	Yes	Yes	H_2S, LEL, CO, O_2
Sweeny Tank Farm Control Room	LEL	Yes	Yes	H_2S, LEL, CO, O_2
Waste Water Treater II Control Room	H_2S, LEL	Yes	Yes	H_2S, LEL, CO, O_2
Freeport FIC Unit 85	LEL	Yes	Yes	H_2S, LEL, CO, O_2
FRAC 1, 2, 3	H_2S, LEL	Yes	Yes	H_2S, LEL, CO, O_2

6.2 Chevron Phillips

6.2.1 **Safe Havens**

6.2.1.1 Buildings designated as Safe Havens shall meet the requirements of CPChem Global OE Standard EHS-6110, Building Siting.

6.2.1.2 Safe Havens have flammable and toxic analyzers, including LEL, H2S, Cl2, HF, and NH3.

6.2.1.3 Safe Havens have automatic inlet damper closure and HVAC shutdown features.

6.2.1.4 The following is a list of CPChem Safe Havens with number of emergency escape respirators:

6.2.1.4.1 U33 Control Room 16
6.2.1.4.2 U24 Control Room 34
6.2.1.4.3 U22/NGL Control Room 39
6.2.1.4.4 PE Control Room 40

6.2.2 Shelter-in-Place

6.2.2.1 CPChem has multiple designated SIP locations that meet the requirements of EHS-6110:

6.2.2.2 SIP for Process Events

6.2.2.2.1 CPChem Admin Building
6.2.2.2.2 CPChem Admin Extension
6.2.2.2.3 PE Main Gate Guard House

6.2.2.3 SIP for Process Events have flammable and toxic analyzers, including LEL, H2S, Cl2, HF, and NH3.

6.2.2.4 Levels of 5 ppm H2S, 25 ppm NH3, 1 ppm CL2, 2 ppm HF or 10% LEL will alarm at the Sweeny and Old Ocean Main Guard Gate.

6.2.2.5 Levels of 10 ppm H2S, 35 ppm NH3, 3 ppm CL2, 4 ppm HF or 20% LEL will alarm at the Sweeny and Old Ocean Main Guard Gate and will also shut down the fresh air inlet blower fan and close the inlet damper.

6.2.2.6 SIP for Weather

6.2.2.6.1 PE Lab

6.2.2.6.2 PE Maintenance Warehouse

7.0 PROCEDURAL CONTENT

In the event of a hazardous gas release, the appropriate Shift Superintendent will act as the initial Incident Commander (IC) and will determine what source control measures must be taken (up to and including process unit shutdown(s)), and whether a localized or site wide evacuation is warranted. The Incident Commander will also determine when the gas release is under control and when to issue an All Clear message.

The Sweeny Complex and Sweeny/Old Ocean Facilities are divided into 7 alarm zones.

7.1 Outside of Safe Havens

7.1.1 If an alarm is activated, pause and listen to the alarm system. The affected zone will be announced. **If you are in the affected zone**, proceed to the nearest and safest Rally Point. Remember to always travel up- and crosswind.

7.1.2 If you **are not in the affected zone**, you may remain in the unaffected zone(s). Remain vigilant and listen for additional instructions over the radio and/or the alarm system. Additional zone alarms may be activated requiring you to proceed to the nearest Rally Point.

7.1.3 Use the windsocks and steam vents throughout the facility to determine the wind direction and proceed cross wind and up wind to the nearest appropriate Rally Point without passing through the affected area.

7.1.4 ***DURING FIRES OR IF NOT LOCATED DOWNWIND OF A TOXIC RELEASE, OPERATIONS PERSONNEL MAY REMAIN AT FIC UNLESS DIRECTED TO EVACUATE BY THE IC.***

7.1.5 Personnel shall not seek shelter in Shelter-in-Place buildings directly impacted by an explosion, fire, or chemical release or a Safe Haven.

7.1.6 Remain at the Rally Point until All Clear has sounded or directed to relocate to another Rally Point.

7.1.7 Do not attempt to Rescue an employee overcome by a gas release

without the appropriate PPE (e.g. Self-Contained Breathing Apparatus) and training.

7.1.8 All personnel driving vehicles shall stop, pull over to clear the roadways for emergency vehicles, shut off engines, leave keys in the ignition, and evacuate to the appropriate Rally Point.

7.1.8.1 All security gates will hold or redirect traffic to a staging area based on instructions from the IC.

7.1.8.2 Emergency Response vehicles and personnel (Initial Response Team, Emergency Response Team, and Loss Prevention) will be allowed to respond as directed.

7.1.9 All hot work will stop. All engines on welding machines and equipment will be shut down and secured. All smoking permits will be suspended.

7.1.10 All confined space entries will be vacated.

ALL PERMITS IN THE AFFECTED ZONE WILL BE SUSPENDED UNTIL THE AREA IS DETERMINED SAFE BY THE SHIFT SUPERINTENDENT AND THE PERMITTING AGENT REVIEWS THE PERMIT.

7.1.11 Cease all non-emergency use of phones and radios.

7.1.12 Be aware of changing conditions and the need to react to conditions.

7.1.13 The first employee or contractor at the Rally Point (RP) shall assume the RP Representative role and begin the accountability process:

7.1.13.1 **Sweeny** – Switch to radio channel to RP Coordinator (Zone 7 Channel 7)

7.1.13.2 **Old Ocean** – Switch radio channel to PE Security (Zone 29 Channel 2).

7.1.13.3 Have all employees/contractors sign in on the Rally Point sign-in sheet and scan into the badge reader if there's one available.

7.1.13.4 Notify RP Coordinator or PE Security of:

- RP Number
- Name of RP Representative
- Number of employees/contractors at Rally Point.

7.1.13.5 Maintain contact with P66 RP Coordinator or PE Security to verify personnel whereabouts and communicate any changes at the RP – total head count, wind, weather, smells/odors, etc. Keep radio traffic to a minimum.

7.1.13.6 Notify P66 RP Coordinator or PE Security if any emergency response or medical assistance is needed.

7.1.14 Employees shall remain at the RP until instructed to leave by P66 RP Coordinator or PE Security/IC, the All Clear sounds, or it is unsafe to stay in the area.

7.2 Phillips 66 Safe Havens/Shelter-in-Place

7.2.1 Refinery & Sweeny Tank Farms and Wastewater II Control Rooms

7.2.1.1 Close and seal all exterior doors with duct tape.

7.2.1.2 Account for all personnel in the building and be prepared to report the names/list per existing emergency evacuation and accountability procedures.

7.2.1.3 Conduct inside air monitoring with handheld monitor every 15 minutes.

7.2.1.4 Remain in the building until the IC gives instructions to leave.

7.2.2 Central Control Room (BRT)

7.2.2.1 Shut down HVAC system (P66 does not allow recirculation of inside air)

7.2.2.2 Close and seal all exterior doors with duct tape.

7.2.2.3 Account for all personnel in the building and be prepared to report the names/list per existing emergency evacuation and accountability procedures.

7.2.2.4 Conduct inside air monitoring with handheld monitor every 15 minutes.

7.2.2.5 Remain in the building until the IC gives instructions to leave.

7.2.3 Cogen Control Room

7.2.3.1 Shut down the HVAC system

7.2.3.2 Cover ventilation intakes and seal all exterior doors with duct tape.

7.2.3.3 Account for all personnel in the building and be prepared to report the names/list per existing emergency evacuation and accountability procedures.

7.2.3.4 Conduct inside air monitoring with handheld monitor every 15 minutes.

7.2.3.5 Remain in the building until the IC gives instructions to leave.

7.2.4 Freeport Terminal Control Room Unit 85

7.2.4.1 Close and seal all exterior doors with duct tape.

7.2.4.2 Account for all personnel in the building and be prepared to report the names/list per existing emergency evacuation and accountability procedures.

7.2.4.3 Conduct inside air monitoring with handheld monitor every 15 minutes.

7.2.4.4 Remain in the building until the IC gives instructions to leave.

7.2.5 FRACs 1, 2, 3

7.2.5.1 Close and seal all exterior doors with duct tape.

7.2.5.2 Account for all personnel in the building and be prepared to report the names/list per existing emergency evacuation and accountability procedures.

7.2.5.3 Conduct inside air monitoring with handheld monitor every 15 minutes.

7.2.5.4 Remain in the building until the IC gives instructions to leave.

7.2.6 Testing the Atmosphere Inside the Safe Haven:

7.2.6.1 At least one portable 4-gas monitor (LEL, O2, H2S, SO2) shall be maintained in the CCB to periodically check the building's entrances and penetrations for potential intrusion of toxic or combustible gases/vapors. The portable monitor must be maintained and calibrated in the same manner as other existing portable monitors maintained by Operations.

7.2.6.2 If readings are obtained at or above the Occupational Exposure Limit (8-hr) in D.8. Respiratory Protection contact the 605 for further instructions.

7.2.7 Listing of Equipment to be Maintained:

7.2.7.1 Equipment and materials to be maintained in Safe Haven buildings to accomplish the tasks and requirements of sealing/securing and monitoring the inside of safe haven buildings, as indicated in Items B & C above include:

- Polyethylene sheeting,
- Scissors,
- Duct tape,
- Flashlights,
- Batteries,
- All-purpose light duty gloves,
- 4-gas monitor (LEL, O2, H2S, SO2)

7.2.7.2 The Safe Haven building shall have a designated storage area for sealing materials, and a posted checklist providing

instructions on how to shut down the HVAC system as necessary.

7.2.7.3 The Operations Team is required to conduct a semi-annual inspection to verify the equipment and materials and identified above are in adequate supply and being properly maintained and calibrated as necessary.

7.2.8 The following locations require essential operations critical personnel to remain to control or shutdown operations during a major emergency incident:

7.2.8.1 Central Control Room (BRT)
7.2.8.2 Refinery Tank Farm
7.2.8.3 Sweeny Tank Farm
7.2.8.4 Waste Water Treater II
7.2.8.5 Freeport LPG Control Room FIC
7.2.8.6 Coker Control Room
7.2.8.7 Cogen Control Room

7.3 Chevron Phillips Safe Haven/Shelter-in-Place

7.3.1 Operations personnel in the Safe Haven at the time of the alarm shall remain until the All Clear has been given or alternate instructions have been given by the IC.

7.3.2 Operations personnel should be prepared to shut down the unit per Emergency SOPs if necessary or directed by the IC.

7.3.3 If safe to do so, non-essential personnel shall vacate the Safe Haven building and proceed cross- and up-wind to the nearest Rally Point without passing through the affected area.

7.3.4 After evacuation of non-essential personnel Safe Haven doors shall remain closed for the duration of the emergency.

7.3.5 **Old Ocean** – the PE Shift Supervisor or designee shall account for all employees and report headcount to PE Security on the Security radio channel (Zone 29 Channel 2).

7.3.6 **Sweeny** – the NGL/U22/U24/U33 Shift Supervisor or designee shall account for all employees and report headcount to the P66 Rally Point Coordinator by radio (Zone 7 Channel 7).

7.3.7 Employees shall remain in the Safe Haven until the All Clear is sounded or directed to leave by the IC.

7.3.8 If the Safe Haven toxic or hydrocarbon alarm sounds:

7.3.8.1 Ensure the HVAC has tripped
7.3.8.2 Trip the HVAC manually if it has not tripped.
7.3.8.3 Confirm the damper position is closed via DCS indication.
7.3.8.4 Ensure the Safe Haven doors remain shut.
7.3.8.5 Operations personnel shall monitor the internal environment with a 4-gas or 6-gas meter.

7.3.9 If the Safe Haven becomes compromised (i.e., pressure loss, contamination):
7.3.9.1 All personnel shall don an SCBA/Escape Pack.
7.3.9.2 Non-essential personnel shall evacuate under the direction of the IC.
7.3.9.3 Operations personnel shall assess the plant situation and safe the unit as needed. After the unit is secured Operations personnel shall evacuate under direction of the IC.

7.3.10 Personnel located in the Administration and Administration Extension buildings will be notified, by Security Personnel, if an alarm has occurred. Instructions to Shelter-in-Place or evacuate will be given at that time.

7.3.11 For all plant alarms other than a fire alarm in the Administration and Extension buildings, personnel in the Administration building will rally in the Multi-Purpose Room (Room 209) and those personnel in the Extension Building will rally in the lunchroom (Room 502) until otherwise directed by the IC or an All Clear has been issued.

8.0 Role-Specific Procedures

8.1 LEAD OPERATOR/SHIFT SUPERVISOR

When the emergency is in the unit:

8.1.1 Deploy unit personnel and initial response equipment to control the emergency. Limit fuel source as soon as possible. Begin Unit Safe-ing procedures (located in Unit Operating Procedures Manual) where applicable.
8.1.2 Account for all personnel located in the unit when the emergency started. Notify the IC of unaccounted for personnel.
8.1.3 Access the Op Emerg. TG channel on the plant radio and announce:
8.1.3.1 Unit location of the incident
8.1.3.2 What the nature of the incident is

When the emergency is not in the unit:

8.1.4 Secure unit and give any needed immediate instructions to operators.
8.1.5 Determine location of incident and wind direction. If downwind of gas

release, notify IC and evacuate to safe location.

8.1.6 Monitor the plant radio on "Shift Team\Operations" channel to obtain updates on the status of the emergency.

NOTE: If directed to do so by the Incident Commander due to unsafe conditions, operations personnel will evacuate to a safe location.

8.2 OPERATIONS PERSONNEL

When the emergency is in the unit:

8.2.1 Shut down the operation in progress following established Unit Emergency Procedures to attempt prevention of further damage.
8.2.2 Extinguish all possible sources of ignition.
8.2.3 Obtain positive product or stream identification if possible.
8.2.4 Evaluate the situation for personnel safety hazards.
8.2.5 Conduct an assessment to determine the source utilizing proper PPE.
8.2.6 Secure the source or minimize the potential discharge by transferring the product if possible.
8.2.7 Conduct containment activities, as appropriate, to minimize the spread of the product.
8.2.8 Activate fire spray systems to protect equipment and people and to mitigate a gas release.

When the emergency is in another unit/area:

8.2.9 Secure area and report to control room for further instructions.
8.2.10 If requested, Initial Response Team members report to designated pick up points for transport to the emergency.
8.2.11 Determine location of incident and wind direction. If downwind of gas release, notify IC and evacuate to safe location.

NOTE: If directed to do so by the IC due to unsafe conditions, operations personnel will evacuate to a safe location.

8.3 WATER TREATER AND #2 STEAM PLANT PERSONNEL

In the event an emergency occurs in the area:

8.3.1 Shut down the operation in progress following established Unit Emergency Procedures to attempt prevention of further damage.
8.3.2 Extinguish all possible sources of ignition.
8.3.3 Obtain positive product or stream identification if possible.
8.3.4 Evaluate the situation for personnel safety hazards.
8.3.5 Conduct an assessment to determine the source utilizing proper PPE.
8.3.6 Secure the source or minimize the potential discharge by transferring the product if possible.
8.3.7 Conduct containment activities, as appropriate, to minimize the spread

of the product.

8.3.8 Activate fire spray systems to protect equipment and people and to mitigate a gas release.

When the emergency is not in the area:

8.3.9 Report to control room.

8.3.10 Determine location of incident and wind direction. If downwind of gas release, notify Incident Commander and evacuate to safe location.

8.3.11 Monitor plant radio (Shift Team\Operations channel), fire water header pressure and fire water pump operation.

8.3.12 Wait for further instructions.

8.3.13 One Water Treater operator should stay with 66P-99, 100, 101 and 102 during a fire and monitor operation until the All Clear Signal is sounded.

8.3.14 One #2 Steam Plant operator should stay with 66P-61, 79, 97, 98 and 107 during a fire and monitor operation until the All Clear Signal is sounded.

NOTE: If directed to do so by the IC due to unsafe conditions, operations personnel will evacuate to a safe location.

8.4 STOCK TEAM PERSONNEL

If emergency is in Tank Farm areas:

8.4.1 Stock Specialist in the emergency area should report to the Shift Superintendent, give information type of product(s) involved in the emergency or in the area of the emergency.

8.4.2 Personnel already mitigating the emergency should continue until relieved by the Initial Response Team or the Volunteer Fire Brigade. Fixed fi re protection systems should be activated to protect equipment and personnel.

8.4.3 Personnel not in the immediate area of the emergency should proceed to the control room for further instructions.

If emergency is in Process Units:

8.4.4 Report to IC in normal work areas for instructions.

8.4.5 Product charge may be requested to be removed from the unit.

NOTE: If directed to do so by the IC due to unsafe conditions, operations personnel will evacuate to a safe location.

8.5 RALLY POINT COORDINATORS

8.5.1 Personnel designated as Rally Point Coordinators should report to the Rally Point Coordinator via radio Zone 7 channels 7 & 8. Rally Point

Coordinator Team will be located in BRT for Complex Personnel Accountability.

8.5.2 In the event of an evacuation the Rally Point Coordinators are responsible for accounting for all personnel (employees, contractors, and visitors) in the plant. The Rally Point Coordinators will also direct movement of personnel at rally points if relocation of personnel is required due to changing conditions.

8.5.3 In the event of ICS activation; the Rally Point Coordinators will report to the Planning Section Chief in the ICS. If the Planning Section Chief position is not staffed, the Rally Point Coordinators will report directly to the Incident Commander.

8.5.4 Roles and responsibilities of the Rally Point Coordinators are:

8.5.4.1 Report to Rally Point Coordinator Center (BRT) when notified of an evacuation.

8.5.5 Assemble and maintain a roster of all personnel at occupied Rally Points.

8.5.6 Maintain contact with occupied Rally Points via plant radios on "Rally Point" channel.

8.5.7 Track all personnel at occupied Rally Points throughout the incident.

8.5.8 Coordinate personnel movement as instructed by the Planning Section Chief or Incident Commander. Personnel movement may be required based on air monitoring results, safe distance guidance determined by product released, or duration personnel must remain at rally or evacuation points.

8.5.9 Participate in debriefing after incident.

8.6 EMERGENCY RESPONSE TEAM AND HEALTH AND SAFETY (H&S) MEMBERS

8.6.1 The Sweeny Complex Emergency Response Team and the H&S Team should proceed to the Fire Station (designated Staging Area) unless the Fire Station is unsafe due to the incident. If the Fire Station is unsafe, an alternate Staging Area will be designated. Once at the Staging Area, they should check in with the Staging Officer and await further instructions.

8.7 ALL REMAINING SWEENY COMPLEX EMPLOYEES, CONTRACTOR EMPLOYEES AND VISITORS

8.7.1 Stop all work and "SAFE" and secure any equipment and tools

8.7.2 Proceed to appropriate Rally Point.

8.7.3 Check in at Rally Point, remain at Rally Point until the All Clear Signal is sounded or otherwise instructed by the Rally Point Coordinator.

NOTE: The first employee or contractor at the Rally Point will assume the role as initial Rally Point Representative. For more information on the roles and responsibilities of the Rally Point Representatives, see ANNEX II – RALLY POINT REPRESENTATIVE.

8.8 OLD OCEAN SECURITY

8.8.1 Security Officers (SO) shall hold traffic or traffic to a staging area at direction of the 602.

8.8.2 Security Operations Center (SOC) shall activate fire/gas alarm on Old Ocean EAS system when notified.

8.8.3 SOC shall communicate with IC and Security Sargent and advise of alarm activation.

8.8.4 Security shall close PE Main Gate and turnstiles for all entry with exception of Emergency Response Team.

8.8.5 SOC shall muster at PE Main Gate.

8.8.6 The Security Sargent or designee shall account for all SO at the PE Main Gate.

8.8.7 SO shall maintain contact with Old Ocean RP Representatives on PE Security radio station (Zone 29 Channel 2) and

8.8.7.1 Communicate changing conditions reported by RP Representatives to the IC.

8.8.7.2 Communicate required RP personnel movements to RP Representatives per direction of the IC.

8.8.7.3 Sum personnel counts from RPs and communicate to IC.

8.8.8 Sargent or designee shall run Accountability Report after all RP Representatives have reported headcount.

8.8.9 Sargent or designee shall report Accountability Report numbers and gaps to IC immediately after report is finished.

8.8.10 On All Clear notification from IC, Sargent shall verify Operations has cleared alarm if fire/gas button was use for activation.

8.8.11 SO shall activate All Clear alarm on EAS system from PE Main Gate.

9.0 TRAINING

9.1 CPChem Employees shall receive training on the ICP:

9.1.1 Upon initial hire,

9.1.2 Whenever the employee's responsibilities or designated actions under the plan change, and

9.1.3 Whenever the plan is changed.

10.0 REFERENCES

- API 752 "Management of hazards Associated with Location of Plant Process Buildings"
- API 751 "Safe Operation of Hydrofluoric Acid Alkylation Units"
- Chevron Phillips Global OE Standard EHS-5200, *Emergency Action and Accounting Plan*
- Chevron Phillips Global OE Standard EHS-6110, *Building Siting*

INTERNAL COMMUNICATIONS

"2911" SYSTEM

The Sweeny Complex Emergency Response System is activated by dialing "2911" on any plant extension (including San Bernard Terminal), by pressing the phone button on any plant radio, or by dialing "491-2911" from any telephone at any one of the three Terminals (Freeport I, Jones Creek, Clemens and Pipelines). The 2911 extension will ring "Emergency Phones" located at the:

⇒ Main Guard Gate
⇒ Shift Team Office
⇒ Stock Dispatchers Office
⇒ Fire Station

This extension is manned 24 hours a day at the Main Guard Gate, and Stock Dispatchers Office. The caller may request that the Plant Alarm System be activated. The appropriate Shift Superintendent is designated the Incident Commander at the time of the call, and sets into motion a Level 1,2 or 3 response based on the information from the caller. Information the caller should provide includes:

⇒ Type of emergency
⇒ Location of emergency
⇒ Any injuries
⇒ Wind direction
⇒ Name of caller
⇒ Should the Plant Alarm be activated
⇒ Resources Needed

"2911" SYSTEM TESTING

The "2911" phone system is tested daily, Monday-Friday, at the plant by the switchboard operator at 11:30 am. The Terminals test at 11:45 am as follows:

Freeport I	Monday
Jones Creek	Tuesday
P66 Clemens	Wednesday
San Bernard	Thursday

RADIOS

The plant radios are equipped with a "Phone Patch" key, when depressed automatically gives dial tone and displays "2911" on radio display. By depressing the push to talk button, the phone will ring. The person activating the phone patch then proceeds with the information in the same manner as if they were on a telephone. Conversation is transmitted by depressing the "Push to Talk" button on the radio.

All emergency communications will begin on the "Shift Team/Operations" channel on the radio. Should the emergency escalate or radio traffic on this channel becomes congested, there are designated channels for the emergency response operations and incident command branches to utilize. Radio communications during an emergency should be limited to those essential to handling the emergency and safe operations of the facility.

All Team Leaders, Emergency Operations Center (EOC) Staff, Shift Team members, Emergency Response Team members, Shift Brigade Captains and Staging Area personnel are assigned hand held portable radios. Key personnel in the Emergency Response System have phone patch capabilities with their radios. There are Base station radios assigned to San Bernard Terminal control room, Clemens Terminal control room, Jones Creek Terminal control room and Freeport I Terminal control room.

PLANT ALARM SYSTEM

The plant alarm system for Sweeny Complex, San Bernard Terminal, Clemens Terminal, Jones Creek Terminal and Freeport I Terminal utilizes strategically located alarm stations.

If an emergency occurs (fire, gas release, or other emergency that could impact personnel), the plant alarm will be sounded, as defined below:

A dual tone wail of 30 seconds that is followed by a public address announcement of the location and nature of the emergency. This will be repeated.

Additional public address announcements may follow as needed.

When the incident is determined to be over by the Incident Commander, the All Clear will be sounded as defined below:

A dual tone, pulsed, steady signal of 30 seconds will be given, followed by a public address announcement of "All Clear".

All Clear signifies that the emergency situation has ended and all personnel should return to normal work activities unless otherwise instructed.

The plant alarm system may be activated by an emergency field activation station, or manually through one of the means below:

From the Main Gate or the Shift Superintendent's office in the P66 Main Office Building.

Interconnect programmed into the portable radios of the Shift Superintendents or operators on duty at San Bernard, Freeport One and Jones Creek Terminals.

Alarm System Central Control Unit (CCU) located in the Control Room of the Terminal for activation of the Emergency Alarm at the Terminals.

EMERGENCY FIELD ACTIVATION STATIONS (CPC ONLY)

The Sweeny Complex also has remote field activation stations located strategically in the process units. These are identified by green and yellow striped triangular pylons situated above the push buttons or by signs having red lettering printed on a bright yellow background at the exit of all plant control rooms. Activating either the FIRE or GAS RELEASE buttons at one of the remote stations will activate the Plant Alarm System.

NON-EMERGENCY ALARM ACTIVATION

Non-Emergency activation of the alarm system consists of the “Westminster Chime” tone, followed by a pre-recorded or live announcement. All activation of the Emergency Alarm System beginning with the “Westminster Chime” tones are to be considered as non-emergency in nature. All work activities should proceed normally unless instructed otherwise.

Non-Emergency announcements may be made Plant wide or to a specific area.

PLANT ALARM TESTING

Testing of the plant alarm systems will be conducted on the following schedule:

Weekly testing:
Plant-Noon on Wednesday
Terminals-Noon on Monday

Routine Alarm System maintenance

Testing Responsibility:

The Main Guard Gate will test the Plant Alarm System. The activation of the Alarm System tests will include alternating the initiation of the system via the local controls.

The Terminals Personnel will test the Alarm System in their respective areas via local controls.

Testing:

The Emergency Alarm System test is the "Westminster Chime" tone followed by "This is a test of the Sweeny Complex Emergency Alarm System. Emergency Alarm Tone" followed by approximately 10 seconds of dual tone wail, then "All Clear tone" followed by approximately 10 seconds of dual tone pulsed signal, concluded by "The test of the Sweeny Complex Emergency Alarm System is complete".

EMERGENCY CALLOUT LIST

In the unlikely event that the Vesta Communicator System cannot be activated, the Emergency Call out List can be found at the Main Guard Gate-Command Center, as they will more than likely initiate the call out list as directed by the Incident Commander.

Hydrogen Sulfide (H2S) MONITOR ANALYZER ALARMS

H2S analyzer alarms are strategically located throughout the Sweeny Complex.

Levels of 5ppm will alarm in the control room only. Levels of 10ppm, or greater, will activate a local alarm consisting of an alternating two tone (high-low) horn and a blue flashing light to alert personnel in the affected area. Personnel in those areas should evacuate cross wind to a safe location.

P66 Main Office Building Alarms

The P66 Main Office Building has H2S, Ammonia (NH3) and Lower Explosive Limit (LEL) gas detection. Levels of 5 ppm's (H2S and NH3) or 20% LEL will alarm in the Shift Superintendent's Office and at the Main Guard Gate. Levels of 10 ppm H2S, 20 ppm NH3 or 40% LEL, or greater will alarm in the Shift Superintendent's Office and at the Main Guard Gate and will also shut down the fresh air inlet blower fan and close the inlet damper. No MOB strobes or horns will be activated.

Personnel located in the Main office building will be notified, by Security Personnel, if an alarm has occurred. Instructions to shelter in place or evacuate will be given at that time.

CPChem Administration Building and Extension Building

The CPChem Administration building has Hydrogen sulfide (H2S), Ammonia (NH3), Chlorine (CL2), Hydrogen fluoride (HF) and Lower Explosive Limit (LEL) gas detection. Levels of 5 ppm H2S, 25 ppm NH3, 1 ppm CL2, 2 ppm HF or 10% LEL will alarm in the Shift Superintendent's Office and at the Main Guard Gate. Levels of 10 ppm H2S, 35 ppm NH3, 3 ppm CL2, 4 ppm HF or 20% LEL, or greater will alarm in the Shift Superintendent's Office and at the Main Guard Gate and will also shut down the fresh air inlet blower fan and close the inlet damper. The strobe light near the southwest exit will be activated.

Personnel located in the CPChem Administration Building will be notified, by Security

Personnel, if an alarm has occurred. Instructions to shelter in place or evacuate will be given at that time. For all plant alarms other than a fire alarm in the Administration Building, personnel in the Administration Building will rally in the Multi-purpose room until further notice.

Safe Havens for CPChem

Safe Havens for CPChem meet the standards of Chevron Phillips Chemical Company Global OE procedure 6110 *Building Siting Procedure.* Global OE procedure EHS-6110 defines **Shelter-In-Place (SIP)** – as "a building that affords passive protection during certain emergency scenarios, but it is not designed to prevent infiltration of contaminated air or withstand over pressure from a blast wave. Generally, a SIP is utilized during the original response to adverse weather conditions, security issues including bomb threats, off-site emergencies or other incident as directed by the local incident command. SIP buildings may serve as an initial assembly and accounting point for personnel following evacuation from an incident area. Criteria for any building designated or used as a Chevron Phillips SIP are defined in Attachment B – SHELTER IN PLACE (SIP) Buildings of CPChem Global OE Procedure EHS-6110 *Building Siting Procedure.*

EXTERNAL COMMUNICATIONS

RAPID NOTIFY SYSTEM

The Rapid Notify System is a telecommunications system utilized by the Sweeny Complex to notify residents of an emergency that may have community impact

In the event one of our facilities experiences some type of emergency, the following personnel are authorized to activate the system:

CAER Coordinator (and designated alternates) (P66 and CPChem)
Shift Superintendents (601 and 602)
Terminal Team Leaders (and their designates) (P66 and CPChem)
Emergency Response Team Leader (P66)
Health & Safety Superintendent (CPChem)
Environmental Team Leader (P66 and CPChem)
HSE Manager (P66 and CPChem)
Human Resources Team Leader (P66 and CPChem)
Operations Manager (P66 and CPChem) Maintenance Manager (P66 and CPChem)
Plant Manager (CPChem)
General Manager (P66)

The Rapid Notify system for the Sweeny Complex encompasses an area of at least a two-mile

radius of the facility and is activated by contacting the Rapid Notify Dispatch Center; only designated personnel can activate this system. Residents within the area will be notified upon activation of the system via telephone. The message will brief them of the nature the emergency, affected areas and possible actions to take.

The Rapid Notify systems for Clemens, Freeport I, and Jones Creek Terminals encompass an area of approximately one-mile radius of each of the terminals. These systems can be activated by contacting CAER Central, staffed by DOW Chemical employees. The residents in the activated zones are notified via telephone also.

CPCHEM CORPORATE NOTIFICATIONS

The CPChem Leadership Team/Manager-on-Call shall notify the CPChem Incident Management Team within 30 minutes by calling the Emergency Contact Number: 1-866-4HAZMAT (1-866-442-9628) of any incident that meets reporting criteria identified in Global OE Standard EHS-1200, *Incident Recording, Reporting, and Management* Appendix A.

OTHER COMMUNICATION METHODS

The Sweeny Complex will utilize the telephone system for making internal and external contacts and notifications. Cellular phones are also assigned to personnel in key roles of the Emergency Response System. Fax machines are located throughout the business unit for use during routine work assignments as well as emergency response efforts. Satellite phones are also located in the Shift Team Office and Clemens Control Room.

IMPLEMENTATION

PERSON(S) RECEIVING 2911 CALLS:
Dialing 2911 (or 491-2911) to report an emergency will ring phones in the following locations:

Stock Dispatchers Office
Main Guard Gate
Shift Team Office
Fire Station

The phones located in Stock Dispatchers Office and Main Guard Gate is equipped with I. D. displays which will denote the origin of the call, enabling the receiving party to call back if further information is required.

Stock Dispatcher or Main Guard Gate responsibilities: Ask questions of the caller to determine:

Name of the caller
Type of Emergency
Location of Emergency
Should Plant wide alarm be sounded
Resources Needed

Based on instruction received from the caller, activate the Plant wide alarm and state the type and location of the emergency over the P.A. system.

Upon notification of an incident, the following procedures should be activated.

Phillips 66 Shift Superintendent (601)

Initiate the Incident Command System and assume the role of Incident Commander.

Instruct the Emergency Response Specialist (605) to respond to the emergency scene. Brief them on the type of emergency and possible resources required. Suggest access routes if applicable.

Assess the emergency and activate the appropriate response personnel.

Notify appropriate personnel of type and size of incident

Chevron Phillips Shift Superintendent (602)

The Chevron Phillips Shift Superintendent (602) will assume the role of Deputy Incident Commander for a P66 incident and the role of Initial Incident Commander, then Deputy Operations Section Chief to the Incident Management Team for a CPChem incident.

Coordinate Unit Safe-ing Procedures of affected Units, as necessary.

Maintain communications with the Incident Commander, Operations Section Chief and affected Units.

Notify appropriate personnel of type and size of incident

Emergency Response Specialist (605)

Upon notification by Shift Superintendent, assume role of Tactical Chief.

Instruct the Shift Captains and Guards to bring necessary response equipment to the emergency scene. Suggest access routes if applicable.

Instruct the Shift Brigade Captains to respond to the emergency scene. Brief them on the type of emergency and suggest access routes if applicable.

Designate Safety Officer as applicable.

ERT INCIDENT COMMAND STRUCTURE

The Sweeny Complex definition of Level of Incident and the Emergency Management System structure for each level can be found in the Sweeny Complex ICP – Annex I.

Each section contains an organizational chart for the Emergency Management System, responsibilities for each function, primary and alternate designates, and the duties for which they are responsible.

CPChem Personnel can refer to the CPChem IMT for specifics of CPChem equivalent Incident Command Structure

EMERGENCY RESPONDERS

Within the Sweeny Complex, certain personnel are identified as Emergency Responders. These personnel can be divided into: Initial Response Team; Emergency Response Team; Incident Management Team or Emergency Operations Center personnel; and Team Leaders.

INITIAL RESPONSE TEAM (IRT)

PERSONNEL

The Initial Response Team (IRT) for the Complex consists of:

Shift Superintendents (601 and 602)

Emergency Response Specialist (605)

Shift Brigade Captains

Operations personnel
Unit 3 Operator

Unit 12/10B Outside Operator
Unit 24 Outside Water Treater Operator
Unit 24 Outside Heater Operator
Unit 25 Operator
Unit 27.2 Operator #1 (out)
Unit 30 Cooling Tower Operator
Unit 33 Outside Heater Operator
Unit 33 Outside Water Operator
Unit 38 Operator
Aromatics Operator
PE Unit Operator (2)

IRT ROLES AND RESPONSIBILITIES
In the event that an emergency is reported:

SHIFT TEAM MEMBERS(601 and 602)
Evaluate the information received from the person reporting the emergency.

Initiate Level of response (if required). (level 1, 2, 3, or medical)

The Phillips 66 Shift Superintendent (601) will assume the duties of Incident Commander as outlined in the Sweeny Complex ICP.

The Chevron Phillips Shift Superintendent, (602) will assume the role of Initial Incident Commander, then Deputy Operations Section Chief to the Incident Management Team for a CPChem Incident.

In the event of a toxic release, utilize available resources to determine safe distances and locations for evacuation purposes.

EMERGENCY RESPONSE SPECIALIST (605)
Contact the Incident Commander for briefing and further instructions, (i.e. type of incident, location of incident, resources needed, etc.)

Respond to the incident location.
Assume the duties of Operations Section Chief as outlined in the Sweeny Complex ICP.

Assess incident and request any additional resources.

Maintain radio communications with IC on Shift Team Operations channel on radio.

SHIFT BRIGADE CAPTAINS
Contact the Operations Section Chief for briefing and further instructions, (i.e. type of incident, location of incident, resources needed, etc.)

Respond to the incident location

Assume the duties of the Emergency Response Branch Director as outlined in the Sweeny Complex ICP.

Maintain radio communications with Operations Section Chief on Shift Team Operations channel on radio.

Security
Contact the 605 or Operations Section Chief for briefing and further instructions, (i.e. type of incident, location of incident, resources needed, etc.)

Respond as directed by the 605 or Operations Section Chief.

Maintain radio communications with 605 & Operations Section Chief on Shift Team Operations channel on radio.

Contact the 605 or Operations Section Chief upon arrival at the scene.

INITIAL RESPONSE TEAM MEMBERS
In the event of an incident, wait for request for IRT via Shift Team Operations channel on the radio.

Respond to incident location.

Monitor radio communications on Shift Team Operations channel on radio (any specific directions will be transmitted, i.e.; wind direction, travel routes, etc.)

Upon arrival at scene, check in with designated Site Safety Officer and receive briefing.

Begin implementing mitigating tactics as directed by Shift Brigade Captain.

The on shift 605 will conduct a daily/shift ERT manpower roll call to ensure availability and minimum staffing of on shift ERT members to assist / relieve IRT in the event of an emergency event

INITIAL RESPONSE SUPPORT ROLES
Raw Water Treater will supply one operator to maintain the river pumps and one operator to maintain the firewater pumps (66-P-99-100-101-102).

#2 Steam Plant will supply one operator to maintain the firewater pumps (66-P-61-79-97-98-107).

EMERGENCY RESPONSE TEAM (ERT)
ERT members in the plant at the time of an activation of the emergency alarm system should report to their Specialist and proceed to the Primary Staging Area (Fire Station) and check in with the Staging Officer.

Upon check in, locate bunker gear and await further instruction from the Staging Officer.

RALLY POINT COORDINATORS

The Rally Point Coordinators are responsible for the accounting of all personnel in the complex in the event an evacuation is necessary. The Rally Point Coordinators are also responsible for managing the movement of personnel at rally points if relocation of personnel is required due to changing conditions.

EMERGENCY OPERATIONS CENTER (EOC) PERSONNEL

Proceed as outlined in the P66 Emergency Action Plan.
CPChem untilizes an Incident Management Team (IMT) that is housed in an Emergency Operations Center (EOC). Refer to the Health & Safety Superintendent for IMT specifics and training.

TEAM LEADERS

Proceed as outlined in the P66 Emergency Action Plan until otherwise directed by the Incident Commander.

Affected unit team leader should contact the Incident Commander.

PRELIMINARY ASSESSMENT

The Sweeny Complex ICP addresses the Preliminary Assessment guidelines as noted below:

Identify Incident Type

An Incident Type may include; fire, spills, gas release, explosion, utility failure, injury, medical condition, confined space/high angle rescue, severe weather, bomb threat, or security threat.

Identify Hazards – Tools and References

SITE SAFETY PLAN (ICS 201-5 or ICS 208) The Shift Brigade Captains, Emergency Response Specialists, Safety Specialist assigned to the Terminals and the Terminals control rooms may have copies of the Site Safety Plan either in their vehicles or in the control room. The forms may also be found, via computer, on the Sweeny Intranet site.

The designated Site Safety Officer may reference the Sweeny Complex UNIT PRE- LANS, which includes Risk Identification Sheet, Chemical Inventory sheet, Process Overview sheets, unit plot plans and unit fire water drawings to identify the hazards for the unit or units involved in the emergency.

The Site Safety Officer will also utilize the MATERIAL SAFETY DATA SHEETS and electronic MSDS system for applicable information on the chemical or chemicals identified in the Unit Pre-Plans. From this information, appropriate levels of Personal Protective Equipment will be determined.

Level of Incident

The Sweeny Complex ICP defines Level of Incident as a Medical Emergency, a Level 3, Level 2, or Level 1 incident. These definitions are found in the Sweeny Complex ICP, Introduction, Purpose and Scope of Plan.

A Medical Emergency is defined as an incident in which only medical responders are requested and there is a single patient for transport.
A Level 3 incident is defined as an incident with minimal or no impact to the process, no off-site impact, and can be managed by the Shift Team with on-site personnel or call-out of the ERT.
A Level 2 incident is defined as an incident with significant impact to a single process unit, may have off-site impact, and may require additional resources to manage the incident.
A Level 1 incident is defined as an incident with significant impact to two or more process units, has off-site impact, and will require additional resources to manage the incident.

Resources Threatened

The Incident Commander, Deputy Incident Commander and the Operations Section Chief may reference the Unit Pre-Plans and other resources to identify the resources threatened in and around the facility.

The Area Contingency Plan (ACP) is located in the P66 E.O.C. and the P66 Environmental Team Library. The ACP may be referenced for information concerning Environmentally Sensitive Areas, Economic Impact Areas, etc. that may be impacted by spills and releases.

OBJECTIVES & PRIORITIES

The Sweeny Complex ICP (P66) utilizes the standardized ICS 202 – General Response Objectives form to assist in identifying and establishing Incident Objectives. The Incident Objectives may include one or more of the following:

Ensure the safety of citizens and response personnel
Control the source of the spill or release
Manage a coordinated response effort
Maximize protection of environmentally-sensitive areas
Contain and recovered spilled material
Recover and rehabilitate injured wildlife
Remove spill material from impacted areas
Minimize economic impacts
Keep stakeholders and public informed of response activities

Priorities for the Sweeny Complex ICP are based on the Phillips 66 and Chevron Phillips Chemical Company LP Loss Prevention philosophies. These philosophies establish the following priorities:

1. Personnel Safety (On-site personnel and Community members)

2. Environmental impact

3. Equipment/ Assets

The Incident Commander will determine the Incident Objectives with input from the Command and General Staff.

Resources will be requested and activated based on the strategic and tactical goals established to accomplish the Incident Objectives.

IMPLEMENTATION OF TACTICAL PLAN

The Tactical Plan will be developed and implemented using the following guidelines:

The Tactical Plan will be developed by the Operations Section, with input from the Command Section as necessary.

The Operations Section Chief is responsible for ensuring the Tactical Plan is completed, but may request or assign personnel to develop the plan.

The Tactical Plan will be developed to comply with the Site Safety Plan for the incident.

The resources necessary to implement the Tactical Plan will be identified by the Operations Section. Resource requests will be coordinated through the Logistics Section.

The Tactical Plan will be approved by the Incident Commander.