



**WALLY WISE GUY**

*The Deer Park LEPC is a cooperative partnership between community, government, emergency response agencies, businesses, and industry striving to promote and maintain public health and safety by preparing for hazardous materials-related incidents as part of a comprehensive community program. Our goal is to protect citizens and the environment by providing hazard awareness education, training exercises, emergency response plans and an emergency notification system.*

## **DEER PARK LOCAL EMERGENCY PLANNING COMMITTEE AGENDA**

A meeting of the Deer Park Local Emergency Planning Committee is to be held at the Deer Park City Hall, 710 E. San Augustine, Deer Park, Texas on August 27, 2024, beginning at 11:00 a.m. to discuss the following business:

### **PLEDGE OF ALLEGIANCE**

### **INTRODUCTIONS**

### **COMPANY OVERVIEW**

- Westlake Epoxy Inc.

### **PRESENTATION**

- Witt O'Briens

### **PUBLIC COMMENTS**

- On LEPC Mission/Function (3-minute time limit)

### **APPROVALS**

- Consideration and approval of minutes from the June 25, 2024 meeting
- Consideration and approval of the monthly financial report

### **COMMITTEE REPORTS**

- Executive Committee
- Communications
  - 2025 Company Overview Sign-Up
  - Review any Level 2 and Level 3 incidents
- Community Awareness
  - 2024 Volunteer Opportunities
  - 2025 Calendar
- Emergency Response/Transportation
  - Drill

### **OPEN FOR NEW BUSINESS**

### **NEXT MEETING**

- Sept. 24, Oct. 22, and Nov 26, 2024

### **ADJOURN**

*Angela Smith*

Angela Smith, TRMC, CMC, Treasurer/Board Secretary



Council Chambers  
710 E. San Augustine  
Deer Park, TX 77536

## Deer Park LEPC Meeting Minutes August 27, 2024

### CALL TO ORDER/PLEDGE OF ALLEGIANCE

Chairman James Stokes called the meeting to order at 11:02 a.m. and led members in the Pledge of Allegiance to the United States and Texas flags.

### INTRODUCTIONS

Joe Reynolds, Business Coordinator for C.I.M.A., Daniel Diaz, Process Safety Engineer for Texas Molecular Corpus Christi, and Chelsea Ward, Environment Health Safety Security & Quality (E.H.S.S.Q.) Manager for Evonik introduced themselves as first-time visitors.

### COMPANY OVERVIEW

Bradley Lyons, the HSE Manager, gave a company overview for Westlake Epoxy Inc. Westlake was founded in 1986 by T.T. Chao and his sons Albert and James Chao. Westlake is located within the Pemex/Shell Deer Park complex along the Houston Ship Channel. This site is notable for its focus on epoxy production, especially after Westlake acquired Hexion Inc.'s global epoxy business. Westlake plays a crucial role in the local industrial sector, particularly petrochemicals. The Deer Park Westlake site concentrates on safety and environmental sustainability, requiring specialized training for workers to meet safety protocols. The founder's statement, "*We have put safety first, and it will remain our number one priority. No job can be so important or urgent that people cannot take the time to work safely. Life is precious and irreplaceable.*" is displayed in every Westlake facility. Westlake operates continuously, 24/7, with 120 employees and approximately 40 supplemental maintenance contractors from Turner. These workers handle the facility's maintenance and operational needs. The facility's workforce includes hourly associates represented by the United Steel Workers, ensuring that labor relations are essential to site operations.

### PRESENTATION

John Carroll is Witt O'Brien's Associate Managing Director of Onshore Compliance. Witt O'Brien is a crisis and emergency management company that Ambipar Group acquired in October 2022. Ambipar Group specializes in global and emergency response services. Mr. Carroll presented the New Clean Water Act Hazardous Substance Facility Response Plans Final Rule. The rule significantly impacts facilities in chemical manufacturing, oil and gas, utilities, and transportation, requiring them to invest in prevention and response infrastructure, personnel training, and regulatory compliance efforts. The 90 E.P.A. Rule mandates that certain facilities that store or manage hazardous substances must develop Facility Response Plans (F.R.P.s) to mitigate the risk of substantial environmental harm from hazardous substance spills into navigable waters. The purpose is to ensure facilities are prepared to prevent and respond effectively to a

worst-case discharge (W.C.D.) of hazardous substances. The rule requires that after meeting the criteria set by the E.P.A., facilities must submit their Facility Response Plans within 90 days or within a similar time frame after certain triggering events, such as facility changes, updates in operations, or regulatory criteria being met.

**PUBLIC COMMENTS ON LEPC MISSION/FUNCTION (3-MINUTE TIME LIMIT)**

No comments.

**MINUTES**

Christina Perez made a motion and Don Davis seconded to accept the minutes for June 25, 2024, as presented. The motion carried unanimously.

**FINANCIAL REPORT**

Jamie Galloway made a motion and Don Davis seconded to accept the financial report as presented. The motion carried unanimously.

**COMMITTEE REPORTS**

**Executive Committee:** None at the time.

**Communications Committee Chairman, Jamie Galloway:** Mr. Galloway announced there was one level 2 at Geo Specialty Chemicals and one level 3 at Pemex

**Level 2 and Level 3 Incidents:** Mario Saenz with Geo Specialty Chemicals informed Mr. Galloway directly on August 12, 2024 regarding the level 2 incident, due to a transformer losing power and as a precaution activated the EOC. There were some issues with e-notify and Mr. Heiken is aware and taking action to correct issues. Geo was able to call an all clear three hours after the incident occurred.

Bryan Moody from Pemex stated that on August 13, 2024, an overload of Sulphur diesel spilled into the ship channel, their emergency response team was on location and worked with the U.S. Coast Guard to mitigate the issue.

**Community Awareness Chairman, Christina Perez:**

**2024 Volunteer Opportunities:** Ms. Perez thanked Nouryon and Oxy for working the Salute to Education event. Companies who have volunteered or have signed up to volunteer are Dow, Geo, Evonik, Lubrizol, Pemex, Oxy, Texas Molecular, Vopak, E3, Nouryon, CTEH, and Exxon Mobil. The next volunteer opportunity is Shelter in Place being held on Sept 4, 2024, at the Maxwell Center, she just needs one more volunteer to assist with answering questions. The other opening for volunteers is for HOTZONE, on Friday October 18, 2024, for the 7 a.m. - 9 a.m. shift. The sign-up sheet was sent to the members at the meeting.

**2025 Calendar:** Ms. Perez stated she is still waiting for commitments from a few companies, and that we are needing to wrap up the loose ends to have the calendar completed. Please contact Ms. Perez after the meeting or via email.

**Emergency Response/Transportation Chairman, Robert Campise:**

**Drill:** Mr. Campise announced that on October 31, 2024, C.I.M.A. will be hosting the All Four Zones Simultaneous Drill. The Sub-Committee met this morning to work drill planning and alignment specifically for Zone 3. DPISD, City of Deer Park, emergency services and C.I.M.A. were all present. If anyone has any questions regarding C.I.M.A. and the zones drill please see Mr. Campise after the meeting.

**NEW BUSINESS**

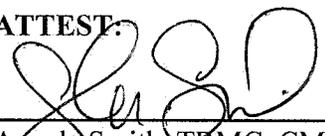
The Southeast Harris County Emergency Services along with local LEPC's and Industry Partners are hosting an event: Seer & Serve BBQ Cook-off on October 11 & 12, 2024, at the Pasadena Fairgrounds. This event is an appreciation BBQ Cook-off for all First Responders. If you would like to participate an email will be sent out with the rules and registration forms.

**NEXT MEETING**

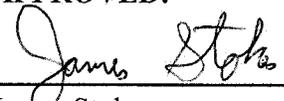
The next meeting is September 24, 2024. Meetings for the 2024 year are available on the agenda.

The meeting adjourned at 11:50 a.m.

**ATTEST:**

  
\_\_\_\_\_  
Angela Smith, FRMC, CMC  
LEPC Board Secretary/Treasurer

**APPROVED:**

  
\_\_\_\_\_  
James Stokes  
Chairman



## History

Westlake was founded in 1986 by T.T. Chao and his sons Albert and James Chao. T.T. Chao brought his expertise to the United States after more than 30 years in the petrochemical industry in Asia. The company started with the acquisition and restarting of a shuttered plant near Lake Charles, Louisiana. Over the years, Westlake has grown significantly, now including a family of companies with team members across multiple nations, all working together to produce essential products for everyday life



# Statement From Our Founder

“We have put safety first, and it will remain our number one priority. No job can be so important or urgent that people cannot take the time to work safely. Life is precious and irreplaceable.”

-T.T. Chao

This quote is displayed on a plaque at every Westlake facility around the world and is a cornerstone of Westlake's commitment to safety.

Westlake

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## Site History and History of Resins at Deer Park

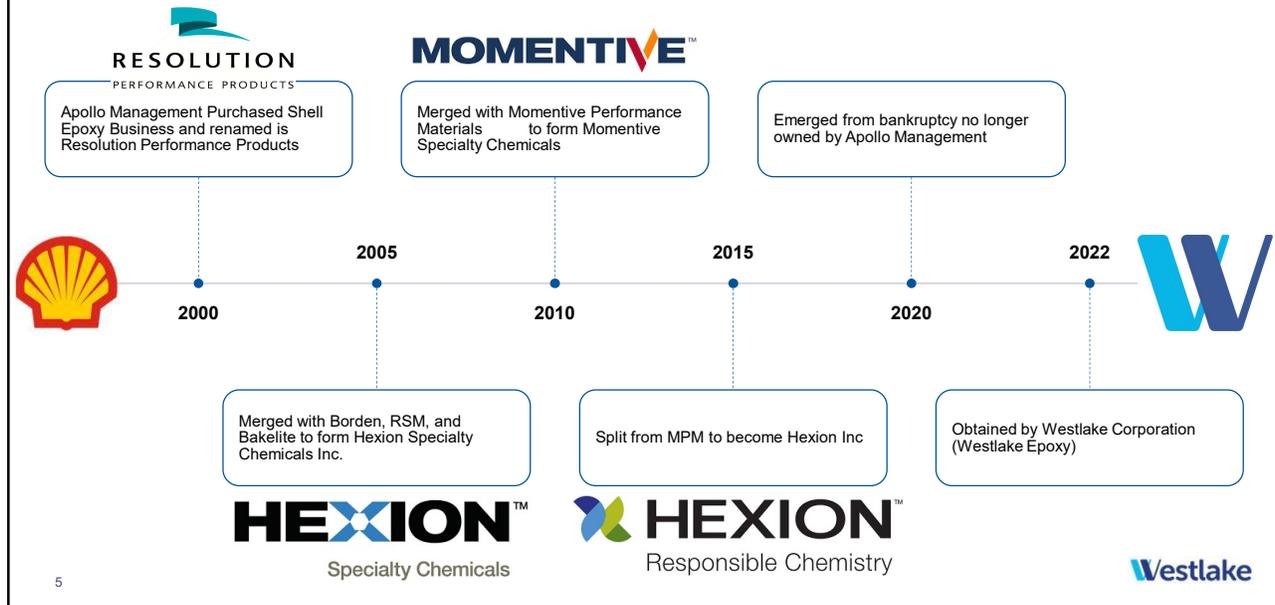
- **Deer Park Chemical Plant Started in 1930's**
- **ECH as by-product of Glycerine production during WWII**
- **Devoe develops Epoxy Resins while working in conjunction with Shell for a use for ECH**
- **First Epoxy Resin plant in the World (ERU-1) built at Deer Park in 1948**
- **Decommissioned Facilities**
  - ERU-2,3,4 and BPA-1,2 started up in the 1960's
  - BPA-3 start up 1978 (OOS)
- **Operating Assets**
  - ERU-5, ERU-6 completed in 1978
  - BPA-4 completed in 1992



Westlake

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## Site History and History of Resins at Deer Park



## Site

**Situated on the PEMEX/Shell Deer Park complex along the Houston Ship Channel in the City of Deer Park**

**Historically strong Safety and Environmental performance.**

**Ability to produce exceptional high quality and on-spec purity products as part of engineering design.**

**Staff of 120 Westlake employees and about 40 Supplemental maintenance contractors (Turner)**

**The facility operates 24/7 on a 12-hour rotating shift**

**Westlake Epoxy hourly associates represented by United Steel Workers**

**Well integrated with upstream feeds**

**Robust distribution and logistics/transportation systems.**

**Close proximity to Westlake Corporate Business Partners and Epoxy Stafford**

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**Westlake**

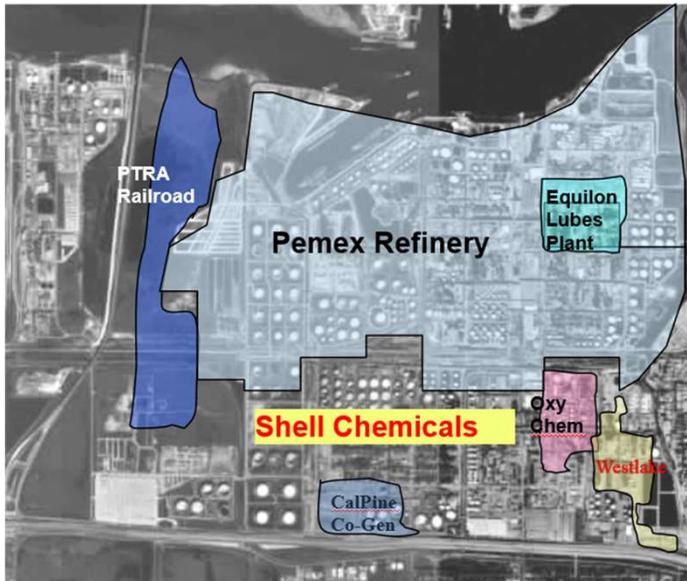
A map of the Houston area with three blue callout boxes. One box labeled 'Westlake Corporate' points to a location in central Houston. Another box labeled 'Stafford offices and labs' points to a location in the southwest. A third box labeled 'Westlake Deer Park Site' points to a location on the eastern shore of the Houston Ship Channel.

Deer Park Site is located along the Houston Ship Channel and inside the PEMEX/Shell Deer Park complex  
 About 30 minutes from the Stafford location which includes Business and Supply Chain as well as Process Technology resources and labs  
 About 30 minutes from the Westlake Corporate offices

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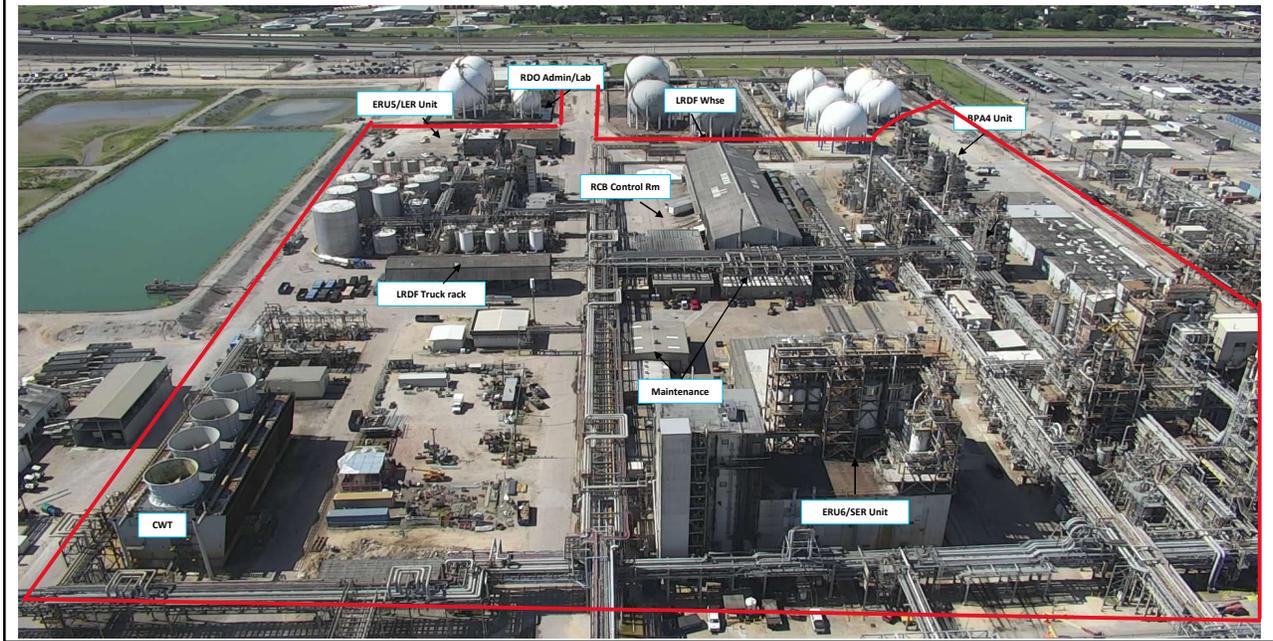
**Westlake**

## Shell/PEMEX Deer Park Manufacturing Complex



- **Seven Separate Corp Operating on Site**
  - Shell Chemicals
  - Pemex Refinery – since January 2022
  - Oxy Vinyl's
  - Westlake Epoxy – 29 acres
  - Equilon - Lubes, PTRA Railroad, CalPine Co-Generation
  - Utilities Jointly owned - Run by Refinery

## Deer Park Site Picture



**What We Produce**

## What We Produce

### (PEM) Performance and Essential Materials:

This segment includes several divisions, each focusing on different product lines:

- **Westlake North American Vinyls:** Deals with products related to polyvinyl chloride (PVC) and vinyl chloride monomer (VCM), which are essential for various plastic and vinyl products.
- **Westlake North American Chlor-alkali & Derivatives:** Focuses on chlorine and caustic soda, which are used in many chemical processes and products.
- **Westlake European & Asian Chlorovinyls:** Similar to the North American Vinyls division but operates in European and Asian markets.
- **Westlake Olefins:** Produces ethylene, polyethylene, and other olefin products.
- **Westlake Polyethylene:** Specializes in the production of polyethylene, which is a widely used plastic.
- **Westlake Epoxy:** Produces epoxy resins used in coatings, adhesives, and other applications.

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### (HIP) Housing and Infrastructure Products:

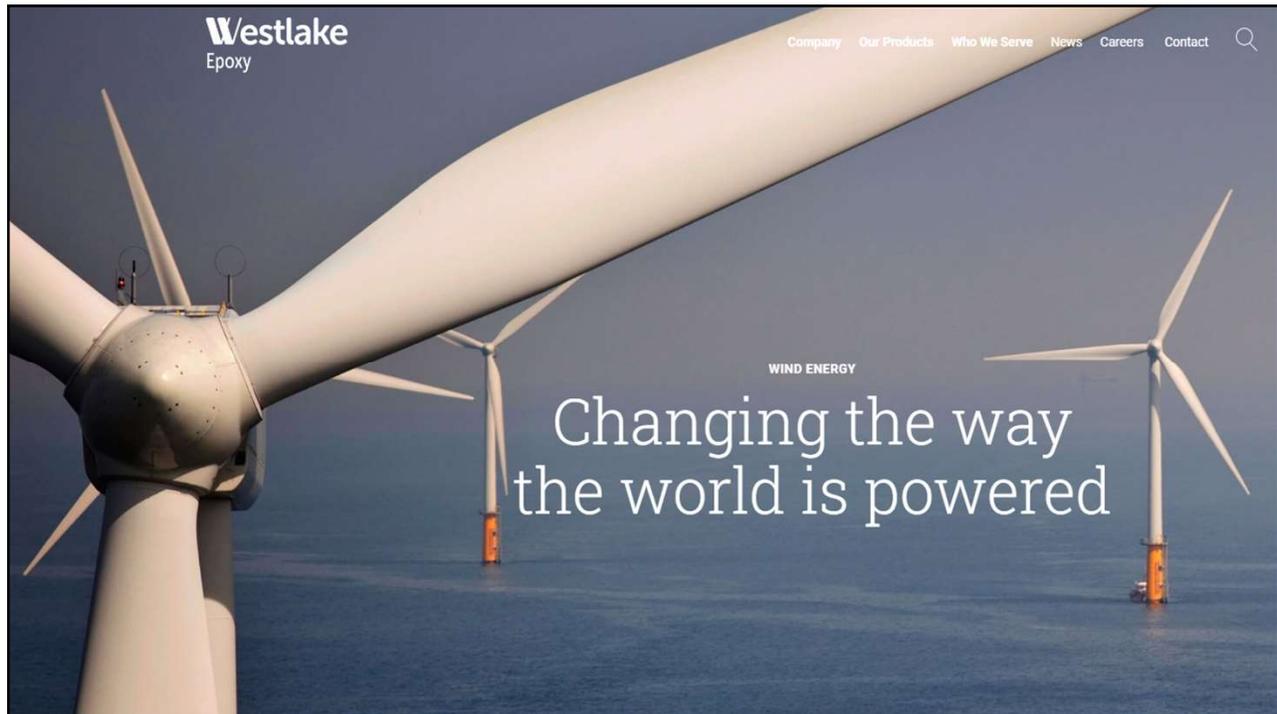
This segment produces consumer facing products comprised of several divisions:

**Westlake Royal Building Products:** Offers a range of building products, including siding, trim, and mouldings.

**Westlake Pipe & Fittings:** Provides PVC pipes and fittings for various applications.

**Westlake Global Compounds:** Deals with compounds based on PVC and other materials.

**Westlake Dimex:** Focuses on products made from post-industrial recycled materials, such as landscape edging and matting.



## Adhesives



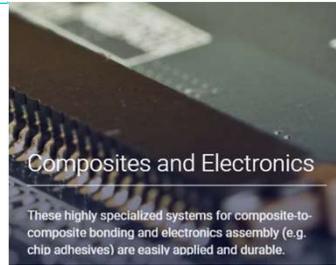
**Aerospace**

We provide proven, technologically advanced solutions for aerospace bonding.



**Automotive**

High performance systems enable adhesive applications such as rubber-to-metal, screw fastening, hem flanges and adhesion promotion in PVC...



**Composites and Electronics**

These highly specialized systems for composite-to-composite bonding and electronics assembly (e.g. chip adhesives) are easily applied and durable.



**Do-it-Yourself**

Bond many substrates and deliver a variety of pot lives and cure times.



**Chemical Anchoring**

Our epoxy or vinyl ester resin-based systems for adhesives that bond metal to a solid substrate can deliver cured systems stronger than the substrate.



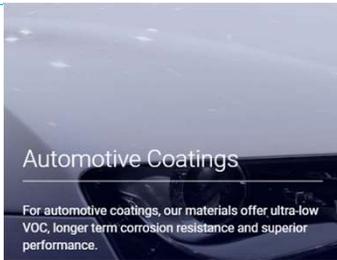
**Construction and Infrastructure**

Westlake epoxy offers resins for adhesives that bond concrete to concrete, metal or other substrates.

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## Coatings



**Automotive Coatings**

For automotive coatings, our materials offer ultra-low VOC, longer term corrosion resistance and superior performance.



**Aerospace Coatings**

Technologically advanced, proven solutions bring enhanced corrosion protection, adhesion and chemical resistance with faster dry times and lower...



**Concrete and Masonry Coatings**

Westlake Epoxy's systems are used to formulate coatings that provide outstanding resistance to water, chemicals and adhesion.



**Transportation Coatings**

Westlake Epoxy's systems and building blocks help produce more sustainable, high-performing coatings for transportation applications.



**Protective, Marine and Shipping Container Coatings**

Epoxy resin system solutions for protective coatings offer longer-term corrosion protection, lower VOC content and low-temperature cure.



**Can, Coil and General Industrial Coatings**

Our epoxy systems for development of can coatings enable improved flexibility, superior adhesion, lower viscosity, as well as, improved corrosion- and...

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# Composites



**Wind Composites**

For turbine blade manufacturers, efficient, reliable processing and excellent laminate quality are key to lowering the cost of wind energy.



**Automotive Composites**

Westlake Epoxy's expertise accelerates the production of lightweight, high performing under-the-hood, structural, exterior and suspension composites.



**General Composites**

From construction, industrial and marine applications to sporting goods, Westlake Epoxy can work with you to find practical composite solutions.



**Rail Composites**

When your rail composite parts need to meet the most stringent fire, smoke and toxicity standards, depend on Westlake Epoxy resins and technical expertise.



**Aerospace Composites**

Whether you build ultralights or commercial jets, Westlake Epoxy reliably supplies top performing composite resin technologies backed by global...

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# Product Highlights



**EPOSIL™ Resin 5550 and EPIKURE LY™ Curing Agent 3805 for marine protective coatings**



**EPIKOTE™ MGS RIMR035c and EPIKURE™ MGS RIMH037 for wind turbine blade production**



**EPON™ Resin and EPIKURE™ Curing Agent TRAC 06150 for light duty truck suspension components (lightweighting)**

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## How We Make it Safely

**Westlake**

## Primary Hazards at Deer Park are from Toxics

### Toxic Risks

- Phenol - Skin Contact - Lethal Contact Area (untreated) ~ 8" x 8"
- ECH – EPI- Epichlorohydrin - Potential Carcinogen; Significant Irritation, Can be toxic.
- Methyl Mercaptan - Inhalation - Lethal Concentration = 150 ppm
  - Replaced with proprietary material in 2018
  - New material is a non-toxic flammable liquid. Instead of receiving Methyl Mercaptan in rail cars, we receive new material in isotainers
  - Significant reduction in the EHS risk to our employees and neighbors from the shipping, unloading, storage and transferring Methyl Mercaptan, reduced RMP worst case scenario from 6.7 miles to 0.2 miles impact
- Sulfuric Acid - Strong Acid - Severe Burns on contact – Rapid Respiratory collapse at high concentrations
- Sodium Hydroxide (Caustic) - Chemical Burns on contact
- Isopropyl Ether and Isopropyl Alcohol

### PSM and RMP Covered Facility

- RMP- TQ ECH and Pentane
- PSM- TQ ECH and Flammable materials

### Fire / Explosive Risk is Moderately Low

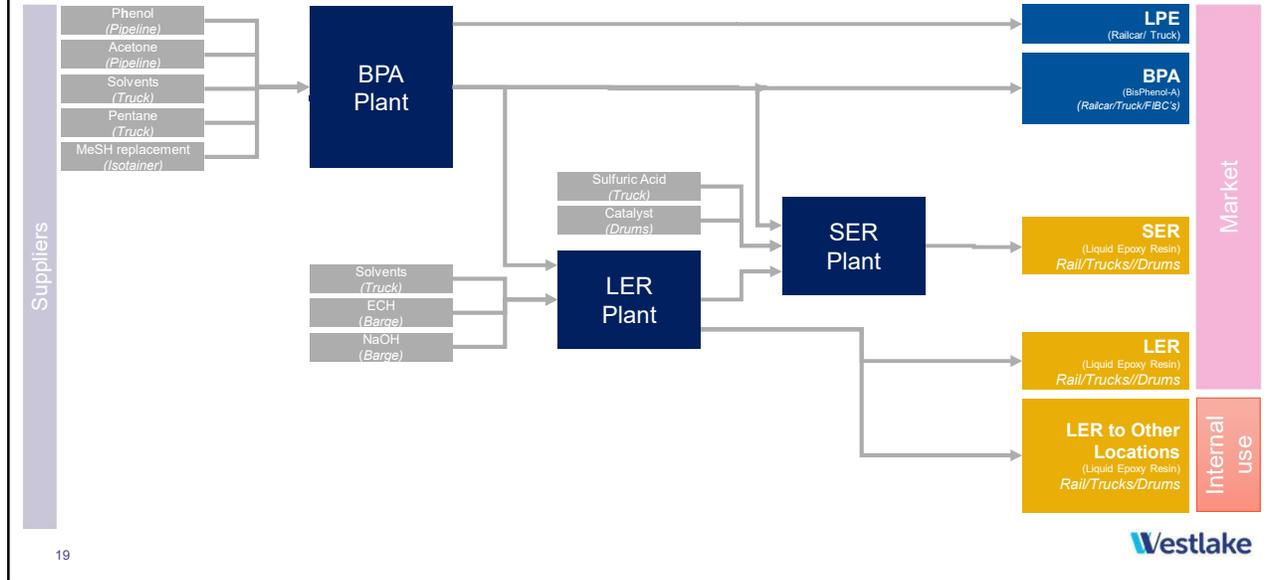
- Max Temp = 360 Deg F
- Max Pressure - Vapor = 15 PSIG
- Max Pressure - Liquid = 200 PSIG

### ERT Team Make Up

- Combination of Staff and Union Members
- Joint Response with Shell and Pemex ERT
- Obligated to supply have 2 members per shift available to respond via S.U.M.F. Agreement
- All new operations personnel are required to be a member of the ERT as a prerequisite to moving into operation

# Westlake Epoxy Deer Park BPA

Site product flows



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PART OF THE **AMBIPAR** GROUP

WITH YOU WHEN IT COUNTS

**DEER PARK LEPC MEETING**

VERSION 01 AUGUST 2024

wittobriens.com

**WITT O'BRIEN'S**  
LEADER IN CRISIS & EMERGENCY MANAGEMENT

**WITT O'BRIEN'S**  
**ambipar**  
response

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**COMPREHENSIVE SOLUTIONS**

 <p><b>EMERGENCY MANAGEMENT</b></p> <ul style="list-style-type: none"><li>• 24/7/365 Incident Response</li><li>• Emergency Planning</li><li>• Training &amp; Exercises</li></ul>	 <p><b>CRISIS COMMUNICATIONS</b></p> <ul style="list-style-type: none"><li>• Crisis Communications Response Planning</li><li>• Media Response Management</li><li>• Media Training &amp; Exercises</li></ul>
 <p><b>OPA-90 COMPLIANCE</b></p> <ul style="list-style-type: none"><li>• Qualified Individual (QI)</li><li>• Incident Management Team (IMT)</li><li>• Response Management &amp; Exercises</li></ul>	 <p><b>CRISIS MANAGEMENT</b></p> <ul style="list-style-type: none"><li>• Crisis Response Planning &amp; Support</li><li>• Policy &amp; Program Development</li><li>• Training &amp; Exercises</li></ul>
 <p><b>REGULATORY COMPLIANCE</b></p> <ul style="list-style-type: none"><li>• Plans &amp; Coverages</li><li>• Training &amp; Exercises</li><li>• Checklists &amp; Handbooks</li></ul>	 <p><b>BUSINESS CONTINUITY</b></p> <ul style="list-style-type: none"><li>• Risk Assessments &amp; Planning</li><li>• Policy &amp; Program Development</li><li>• Training &amp; Exercises</li></ul>
 <p><b>VESSEL ATTENDANCE &amp; TRAINING</b></p> <ul style="list-style-type: none"><li>• Audits</li><li>• Inspections</li><li>• Onboard &amp; eLearning Training Options</li></ul>	 <p><b>REGULATORY SECURITY COMPLIANCE</b></p> <ul style="list-style-type: none"><li>• Planning, Assessments &amp; Audits</li><li>• Policy &amp; Program Development</li><li>• Training &amp; Exercises</li></ul>

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**HAZMAT RESPONSE, ENVIRONMENTAL SERVICES AND WASTE MANAGEMENT**

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**ambipar**<sup>®</sup>  
response

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EMERGENCY RESPONSE (24/7)

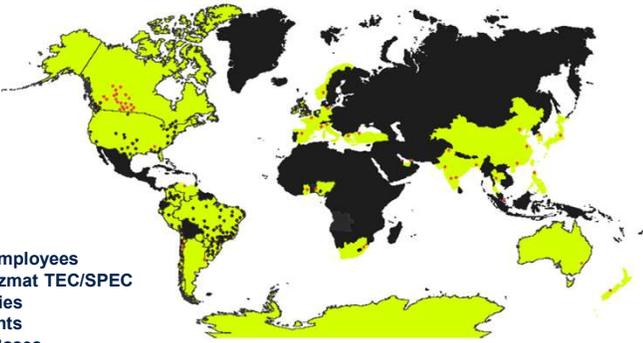
ENVIRONMENTAL RESPONSE

INDUSTRIAL RESPONSE

FIRE RESPONSE

MARINE RESPONSE

40 COUNTRIES, 6 CONTINENTS



- 15,000+ Employees
- 9,500+ Hazmat TEC/SPEC
- 36 Countries
- 6 Continents
- 400+ ER Bases
- 25,000+ Clients
- 120+ Hazmat Emergencies Per Day

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WITT O'BRIEN'S  
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response

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**NEW CLEAN WATER ACT  
HAZARDOUS SUBSTANCE  
FACILITY RESPONSE PLANS  
FINAL RULE**

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## Timeline for Compliance



**FRPs due 3 years after effective date of final rule**



**Substantial Harm Certification Forms due 3 years after effective date of final rule**



**After initial period:**  
FRPs due within **6 months of meeting criteria**  
Substantial Harm Certification forms due within **60 days of meeting criteria**



**Recertify plans and Substantial Harm Certification Forms every 5 years**



**Amendments (material changes) within 60 days**

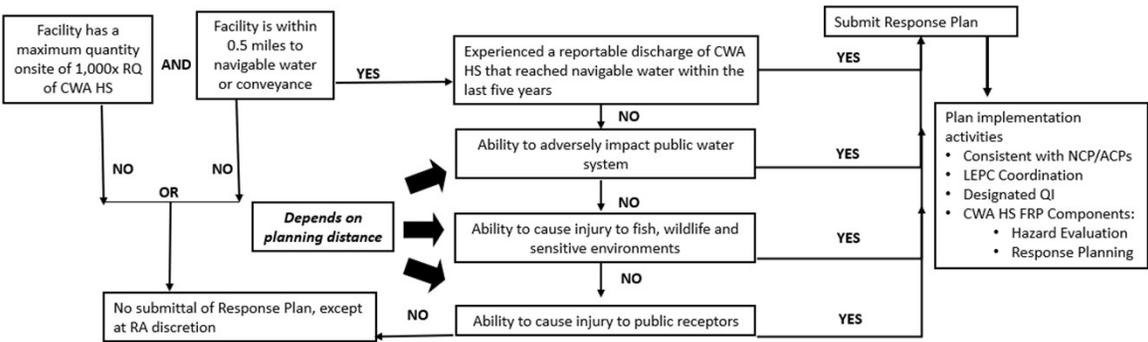




## Applicability Criteria







```

graph TD
    A[Facility has a maximum quantity onsite of 1,000x RQ of CWA HS] -- AND --> B[Facility is within 0.5 miles to navigable water or conveyance]
    A -- NO --> C[No submittal of Response Plan, except at RA discretion]
    B -- NO --> C
    B -- YES --> D[Experienced a reportable discharge of CWA HS that reached navigable water within the last five years]
    D -- YES --> E[Submit Response Plan]
    D -- NO --> F[Ability to adversely impact public water system]
    F -- YES --> E
    F -- NO --> G[Ability to cause injury to fish, wildlife and sensitive environments]
    G -- YES --> E
    G -- NO --> H[Ability to cause injury to public receptors]
    H -- YES --> E
    H -- NO --> C
    E --> I[Plan implementation activities: Consistent with NCP/ACPs, LEPC Coordination, Designated QI, CWA HS FRP Components: Hazard Evaluation, Response Planning]
    
```

*Depends on planning distance*





## Regulated: Threshold Quantity

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response

### **Clear:**

- 1,000x multiplier (different from the proposed rule of 10,000x)

### **Foggy:**

- Not just containers like oil OPA90, can be:
  - Containers, systems, interconnected piping/containers, etc., must be evaluated

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## Exemptions: Exclusions - Clear

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response

### **Clear:**

- USCG Transportation Modes - *33 U.S.C. 1321(j)(5)(C)*
- DOT Transportation Modes - *49 CFR parts 171-180*
- Equipment/Operations MOU - *40 CFR part 112, Appendix B*
- USTs/Piping – *Under 280 or 281*
- Articles – *Endpoint Design*
- Uses (*a term*) – *As defined in the new rule*

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## Exemptions: Foggy

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response

### Foggy (Will take a lot of time/effort):

- Known mixtures – use the highest range
  - Will require calculations per mixture
- Unknown mixtures – assume HS in 100% of the known portion
  - Will require calculations per mixture

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## Exemptions: Beware

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response

### Beware:

- Process/cooling water – limited, not all-inclusive
  - Natural and Municipal only
- Gases/Solids – Left to best judgment – revolving door
  - Not exempt outright
- POTW/Municipal versus Industrial – Exempt or not?
- Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities (40 CFR part 264 and part 265) and RCRA Generators (40 CFR part 262 subpart M)

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## Exemptions: Omission?

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response

### Confusing:

- Preamble excludes 40 CFR 112.20 OPA90 Oil
  - Rule doesn't include preamble statement
    - If meant for the rule, what about non-OPA90 oil = SPCC Oil? The preamble states 112.20 (OPA90), not 112.

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## Applicability – New Process

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response

### • Appeals and Petitions

- Key takeaways:
  - a process to appeal an EPA determination of applicability
  - a process for the public to argue your applicability

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## Applicability – Planning Distance

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response

### **Foggy: Conveyance to Navigable Water**

- No time frames like OPA90 Oil
- Distance limitations/cutoffs/...????

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## Applicability – Make Note!

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response

### **Learning curve:**

- *(i) Violates any National Primary Drinking Water Standard or State Drinking Water Regulation, such as an exceedance of a Maximum Contaminant Level;*
- *(ii) Compromises the ability of the public water system to produce water that complies with any National Primary Drinking Water Standard or State Drinking Water Regulation;*
- *(iii) Results in adverse health impacts in people exposed to the maximum concentration that could enter a drinking water distribution system;*
- *(v) Impairs the taste, odor, or other aesthetic characteristic of the water entering a drinking water distribution system to a degree that could make the water unacceptable to consumers and that could prompt the public water system to issue use restrictions;*

WITT O'BRIEN'S

## WCD – More than one!

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response

- WCD per regulated HS
  - Will require multiple reviews/calculations
  - Not just a volume statement – impact considerations based on HS on the environment, too!
- Not largest container; largest capacity capable onsite
  - Not black and white
  - Container(s), systems, interconnected piping/containers, etc., must be evaluated

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## Planning Distance – Devl. Needed

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response

- Must use models – currently non-existent for application
  - Overland considerations – *similar to OPA90*
  - Distance considerations – *similar to OPA90*
  - CWA HS properties – many variables – dependent on HS
    - Evaporation
    - Solubility
    - Speciation in water
    - Polarity
    - ....

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## Response Resources

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response

- **Resources:** At plan holders' discretion based on HS
  - Open to interpretation – revolving door
- **Contracts**
  - Equipment – Like OPA90
  - Fire/explosion – New evidence
    - Must now have an internal fire liaison
- **New consideration:** Air and Water monitoring equipment

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## Training and Drills

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ambipar®  
response

- **Training:** At plan holders' discretion
  - No current PREP amendment – can lead to confusion
    - EPA is working on updating PREP
- Shall coordinate with gov. officials – or document attempts

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## Two Key Responses Timeframes

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- **i) One hour of discharge detection:** Complete notifications; mobilize facility response personnel for immediate response actions; identify the scale of the incident and coordinate with SRO on appropriate response actions; complete cross-check of worst case discharge scenarios and resulting potential effects to begin tactical planning based on the scale of the incident; ensure containment and neutralization systems are operational; coordinate evacuation of facility, if necessary; coordinate with drinking water authorities; mobilize response equipment, as appropriate; and coordinate with local police and fire officials. Initiate community evacuation plan, if necessary, and evaluate if downstream (or upstream, if tidally influenced waterbody) public receptors that could be impacted and may require evacuation.
- **(ii) Two hours of discharge detection:** As appropriate, deploy response resources identified in the response plan, including containment and recovery devices (such as containment dams, culvert plugs, underflow dams, containment booms, skimmer equipment or acid/base neutralization resources); and initiate any water, soil, and air monitoring as outlined in the response plan.

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## Disposal Plan

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response

- Mainly mirrors OPA90
  - **New item:** Management of spent chemicals, including firefighting runoff management.

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## Coordination Activities

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response

- Coordinate with LEPC and TEPC – Documented – **Initially and Annually**
  - Proof
  - Agreements
  - Attempts
- Coordinate with downstream public water systems – **Initially during plan development**

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## FRP Development

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response

- Format mainly mirrors oil OPA90
  - ACP/NCP alignment (where/when available, not always current: being updated-When?)
  - ERAP
  - Facility descriptions/overview/contacts/etc.
  - QIs
  - Planning discussions/resources
  - Evacuation Plans
  - Disposal Plans
  - Hazard Evaluation (more in-depth, but not complicated)
  - Training/Drills

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## FRP Development - New

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- A signed affirmation that the owner or operator has reviewed relevant plans during facility response plan development and resubmission
- QI responsibilities: align with new requirements in HS rule
  - Must understand HS characteristics to make proper notifications and determinations
  - Must have IC training = OSHA HAZWOPER
- Discharge Detection Systems: Emphasis on air and water monitoring capabilities – equipment/process/plan

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## FRP Development - New

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- Hazard Evaluation Additions
  - *impacts to communities with environmental justice concerns; and impacts of climate change, including but not limited to the increased frequency and intensity of extreme weather events, temperature fluctuations, rising seas, storm surges, inland and coastal flooding, drought, wildfires, and permafrost melt in northern areas. Illustrative diagrams of the hazard evaluation should be included.*
  - Risk identification matrix – *Similar to OPA90*
  - Risk characterization matrix
  - Risk control – *Similar to OPA90*
  - Risk communication – *Similar to OPA90*

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Deer Park LEPC

Report June 25 – August 20, 2024

**Plant Incident Reports Summary**

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Level 1 - Courtesy Notification	27
Level 2 - (Watch) Potential Off Site Impact	1
Level 3 - (Warning) Off Site Impact	1
Drill, Exercise or Fire Training	12
System Test	92
Training Report Submittal	8

**Level 2**

8201-2024-3710-1	Initial Report	Level 2 - (Watch) Potential Off Site Impact	8/12/2024 2:58:00 PM	GEO Specialty Chemicals
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Power Loss

**Level 3**

48201-2024-3729-1	Initial Report	Level 3 - (Warning) Off Site Impact	8/13/2024 10:52:00 AM	PEMEX Deer Park
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Official reported volume is two gallons of diesel