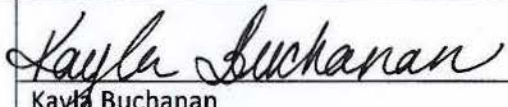
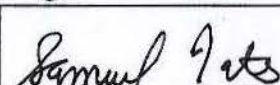


**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	08/28/2018-08/31/2018		
Media:	Air		
Regulatory Program(s)	RMP, Title V		
Company Name:	Chemours		
Facility Name:	La Porte Plant		
Facility Physical Location:	12350 Strang Road		
(city, state, zip code)	La Porte, Texas, 77571		
Mailing address:	12350 Strang Road		
(city, state, zip code)	La Porte, Texas, 77571		
County/Parish:	Harris		
Facility Contact:	Shannon Davis	Environmental Health & Safety (EHS) Specialist	
	Shannon.davis@chemours.com		
FRS Number:	110064375260		
Identification/Permit Number:	Title V Air Operating Permit ID: O1845; O1846		
Media Number:	RMP: 100000229068		
NAICS:	32518		
SIC:	N/A		
Primary Personnel participating in inspection:			
Don Kuhlmann	Chemours La Porte Plant	Plant Manager	(281) 417-7800
James Gallion	Chemours La Porte Plant	EHS Specialist	(281) 417-7824
Shannon Davis	Chemours La Porte Plant	EHS Specialist	(281) 417-7784
Sharon Cantu	Chemours La Porte Plant	Administration Assistant	(281) 417-7781
EPA Lead Inspector Signature/Date	 Kayla Buchanan		10/15/2018 Date
Supervisor Signature/Date	 Samuel Tate		10/17/2018 Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

I, the Environmental Protection Agency (EPA) Region 6 inspector Kayla Buchanan, arrived at the Chemours La Porte Plant (Chemours La Porte) at 9 a.m. on August 28, 2018 for an announced inspection. I convened an opening conference and met with several representatives from the facility (*see Appendix 1*). I presented my credentials to the opening conference attendees and informed them that this was an EPA inspection to determine Chemours La Porte's compliance with the Clean Air Act (CAA) Sections 112(r)(1) and 112(r)(7). The scope of the inspection was a partial compliance evaluation of the facility pursuant to 40 CFR Subpart 68 – Chemical Accident Prevention Provisions. The facility does have union representation and provided its union with notice of this inspection.

FACILITY DESCRIPTION

Chemours La Porte is located at 12350 Strang Road in La Porte, Texas. The facility produces hydrofluoric and sulfuric acid. The owner/operator uses both chemicals in amounts above the threshold quantities listed in 40 C.F.R. Part 68 rule in its process streams. Approximately 136 full time employees and 40 contract employees work at the plant.

Section II - OBSERVATIONS

On August 30, 2018, I conducted a walk-through of the facility and was accompanied by EHS Specialists Shannon Davis and David Gallion to observe the covered processes, equipment, operations, and emergency equipment. I observed no visible spills, leaks, or unpermitted air emissions

40 C.F.R. Part 68 – CHEMICAL ACCIDENT PREVENTION PROVISIONS

Subpart A – General

40 C.F.R. § 68.10 Applicability – Chemours La Porte is the owner of a stationary source that has more than a threshold quantity of regulated substances, sulfuric acid (oleum), and hydrogen fluoride, in its process streams; therefore, this regulation is applicable. The distance to a toxic or flammable endpoint for a worst-case release assessment conducted under Subpart B of the regulation is more than the distance to any public receptor, and this facility is subject to the Occupational Safety and Health Administration's (OSHA) Process Safety Management (PSM) Standard (29 CFR 1910.119), categorizing it as a Program 3 facility.

40 C.F.R. § 68.12 General Requirements – I reviewed Chemours La Porte's May 15, 2015 Risk Management Plan (RMP) submission. It reflected all its covered processes.

40 C.F.R. § 68.15 Management – Chemours La Porte developed a management system to oversee the implementation of the RMP elements and assigned a qualified person or position that has the overall responsibility for the development, implementation, and integration of the risk management program elements. When responsibility for implementing individual requirement of this part is assigned to

individuals other than the person identified, the names or positions of these people were documented and the lines of authority were defined through an organization chart.

Subpart B – Hazard Assessment

40 C.F.R. § 60.20 Applicability – Chemours La Porte is a Program 3 stationary source subject to this subpart; therefore, it is required to prepare a worst-case release scenario analysis and complete the five-year accident history.

40 C.F.R. § 60.22 Offsite Consequence Analysis (OCA) Parameters – Chemours La Porte utilized EPA RMP*Comp™ software and the RMP Offsite Consequence Analysis Guidance to ensure the OCA parameters were met. I reviewed the facility's OCA documentation to ensure the data was accurate and up to date.

40 C.F.R. § 60.22 Worst-case Release Scenario Analysis – Chemours La Porte identified and analyzed its worst-case release scenario that is estimated to create the greatest distance in any direction to an endpoint for each regulated toxic substance held in a covered process using the parameters specified in the regulation.

40 C.F.R. § 68.28 Alternative Release Scenario Analysis – Chemours La Porte identified and analyzed at least one alternative release scenario for each regulated toxic substance held in a covered process using the parameters specified in the regulation.

40 C.F.R. § 68.30 Defining offsite impacts- Population – Chemours La Porte estimated the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint; likewise, they used the most recent Census data to estimate the population potentially affected.

40 C.F.R. § 68.33 Defining offsite impacts- Environment – Chemours La Porte listed in its RMP environmental receptors within a circle with its center at the point of the release and a radius determined by the distance to the endpoint as defined in § 68.22(a) of this part; likewise, they relied on U.S. Geological Survey (U.S.G.S.) data to identify environmental receptors.

40 C.F.R. § 68.36 Review and Update – Chemours La Porte is required to update its OCA once every five years. The corporation has only been in existence for three years.

40 C.F.R. § 68.39 Documentation – Chemours La Porte is required to maintain the following records on the offsite consequence analyses: (a) For worst-case scenarios, a description of the vessel or pipeline and substance selected as worst case, assumptions and parameters used, and the rationale for selection; assumptions shall include use of any administrative controls and any passive mitigation that were assumed to limit the quantity that could be released. Documentation shall include the anticipated effect of the controls and mitigation on the release quantity and rate. (b) For alternative release scenarios, a description of the scenarios identified, assumptions and parameters used, and the rationale for the selection of specific scenarios; assumptions shall include use of any administrative controls and any mitigation that were assumed to limit the quantity that could be released. Documentation shall

include the effect of the controls and mitigation on the release quantity and rate. (c) Documentation of estimated quantity released, release rate, and duration of release. (d) Methodology used to determine distance to endpoints. (e) Data used to estimate population and environmental receptors potentially affected. Several elements of this documentation were missing, including the anticipated effect of the controls and mitigation on the release quantity and rate and the rationale for the selection of specific scenarios **(AOC #1)**. After the inspection, Chemours La Porte provided additional documentation to address the missing elements **(Appendix 2)**.

40 C.F.R. § 68.42 Five-year Accident History – I reviewed Chemours La Porte’s five-year accident history and I did not locate any accidental releases from covered processes that resulted in deaths, injuries, significant property damage on site, known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage. I examined Chemours La Porte’s OSHA’s Form 300 logs from the past five years and queried the National Response Center (NRC) database to ensure additional releases from the facility that could possibly be included in the facility’s five-year accident history were not omitted. There was one accidental release included in Chemours La Porte’s five-year accident history but it occurred in 2012, exceeding the five-year statute of limitations; therefore, a report was not needed.

Subpart D – Program 3 Prevention Program

40 C.F.R. § 68.65 Process Safety Information (PSI) – I reviewed Chemours La Porte’s compilation of PSI. This PSI included information pertaining to the hazards of the regulated substances used or produced by the process, information pertaining to the technology of the process, and the information pertaining to the equipment of the process. The information pertaining to the hazards of the regulated substance consisted of toxicity information, permissible exposure limits, physical data, reactivity data, corrosivity data, thermal and chemical stability data, and hazardous effects of inadvertent mixing of different materials that could foreseeably occur. The information concerning to the technology of the process consisted of a block flow diagram or simplified process flow diagram, process chemistry, maximum intended inventory, safe upper and lower limits for such items as temperatures, pressures, flows or compositions and, an evaluation of the consequences of deviations. The information pertaining to the equipment in the process consisted of materials of construction, piping and instrument diagrams (P&ID’s), electrical classification, relief system design and design basis, ventilation system design, design codes and standards employed, material and energy balances for processes built after June 21, 1999; and safety systems (e.g. interlocks, detection or suppression systems). Chemours La Porte documented that its equipment complies with recognized and generally accepted good engineering practice.

40 C.F.R. § 68.67 Process Hazard Analysis (PHA) – Chemours La Porte performed initial PHAs on processes covered by this part and maintained previously revalidated PHAs every five years after the initial completion dates. The facility utilizes various methodology to conduct PHAs including HAZOP, What-If Checklists, and Fault Tree Analysis. Prior to conducting a PHA, the Chemours La Porte PHA team uses a decision tree to determine which methodology is most appropriate to the complexity of the process and identifies, evaluates, and controls the hazards involved in the process.

The PHAs reviewed addressed: (1) the hazards of the process; (2) the identification of any previous incident, which had a likely potential for catastrophic consequences; (3) engineering and administrative controls applicable to the hazards and their interrelationships; and (4) consequences of failure of engineering and administrative controls.

The PHAs were performed by a team with expertise in engineering and process operations and the team included at least one employee who had experience and knowledge specific to the process being evaluated and a member of the team must be knowledgeable in the specific PHA methodology used.

Chemours La Porte established a system to promptly address the team's findings and recommendations and assured the recommendations were established in a timely manner and that the resolutions were documented. The facility developed a written schedule of when these actions were to be completed. They communicated the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations of actions.

40 C.F.R. § 68.69 Operating Procedures – I reviewed several of Chemours La Porte's written operation procedures. Each operating procedure reviewed provided clear instructions for safely conducting activities involved in each covered process consistent with the PSI. The operating procedures addressed the steps for each of the operating phase, operating limits, safety and health considerations, and safety systems and their functions.

The operating procedures were readily accessible to employees who work in or maintain a process. While on the facility site tour, I requested randomly selected process operators to dictate, as well as, demonstrate how to access the operating procedures and each were knowledgeable about the way to access the procedures.

Chemours La Porte certified annually that its operating procedures are current and accurate. They developed and implemented safe work practices to provide for the control of hazards during operations such as: lockout/ tagout; confined space entry; opening process equipment or piping; and control over entrance into a stationary source by maintenance, contractor, laboratory, or other support personnel.

40 C.F.R. § 68.71 Training -- The regulation requires that each employee presently operating a process and each employee newly assigned to a covered process be trained or tested to be competent in the operating procedures provided that pertain to their duties. I reviewed training records for randomly selected employees with the training coordinator to ensure that initial training was documented and that each employee involved in operating processes received and understood the training. The training coordinator provided me with a list of employee's refresher training, and identified two employees that were five months overdue for refresher training (**Appendix 3**) (**AOC #2**). After the inspection, Chemours La Porte provided documentation showing that these employees have since completed the refresher training (**Appendix 4**).

40 C.F.R. § 68.73 Mechanical Integrity – I reviewed Chemours La Porte's written operating procedures for maintaining the mechanical integrity of its process equipment. I also reviewed the training documentation for its employees involved in maintaining the on-going integrity of process equipment.

Chemours LaPorte's inspections and tests complied with recognized and generally accepted good engineering practices (RAGAEP) and the frequency of these tests were consistent with applicable manufacturers' recommendations and good engineering practices. The facility stated that none of its process equipment inspections were overdue. Chemours La Porte uses the SAP software system to track its mechanical integrity tests and inspection. I reviewed mechanical integrity inspection documentation for several tanks, as well as, preventative maintenance tests for rotating equipment. The inspection documentation identified the date of the inspection or test, the name of the person who performed the inspection or test, the serial number or other identifier of the equipment on which the inspection or test was performed, a description of the inspection or test performed, and the results of the inspection or test.

40 C.F.R. § 68.75 Management of Change (MOC)– I reviewed Chemours La Porte's written MOC procedure, which the facility has implemented to manage changes to process chemicals, technology, equipment, procedures, and changes to stationary sources that effect a covered process. The implementation of the procedure assured that the following considerations are addressed prior to any change: technical basis for change, impact of change on safety and health, modifications to operating procedures, necessary time period for the change, and authorization requirements for a proposed change.

The regulation requires employees involved in operating a process and maintenance and contract employees whose job tasks will be affected by a change in the process to be informed of, and trained in, the change prior to the start-up of the process or affected part of the process, however, Chemours La Porte did not always do this (**Appendix 5**) (**AOC #3**). In August 2018, the facility finalized a new procedure to ensure compliance with this subpart; it requires that some form of training be provided to the employees affected by the change (**Appendix 6**).

If a change results in a change in safety information, the regulation requires such information to be updated accordingly. I reviewed several MOCs that required an update to piping and instrumentation diagrams (P&IDs) and each of which were completed. I also reviewed MOCs that required a procedure change and Chemours La Porte provided me with the updated procedures.

40 C.F.R. § 68.77 Pre-startup Review (PSSR) – I reviewed Chemours La Porte's written PSSR procedures, as well as, various PSSRs completed by the facility in the past five years. The PSSRs I reviewed confirmed that prior to the introduction of regulated substance into the process, construction and equipment were in accordance with design specifications and safety, operating, maintenance, and emergency procedures were in place and were adequate. The PSSRs did not always ensure that training of each employee involved in operating a process was complete because training was not always required for MOCs (**see AOC #3**).

40 C.F.R. § 68.79 Compliance Audits – Chemours La Porte performs a 1st party audit of the various RMP elements on a rotating basis, but evaluates all elements once per three years (**see Appendix 7**). An additional 2nd party audit is performed by a corporate Chemours employee at least once every five

years. I reviewed both the 1st and 2nd party audits. The audits were conducted by at least one person knowledgeable in the process, and reports of the findings were developed. Chemours La Porte promptly determined and documented an appropriate response to each of the findings of the compliance audits, and documented that the deficiencies were completed or scheduled to be completed.

Chemours La Porte is required to certify that they have evaluated compliance with the provisions of this subpart at least every three years to verify that the procedures and practices developed under the rule are adequate and are being followed, yet the certification statement reviewed only certifies compliance with the OSHA PSM Standard not EPA's RMP requirements (**Appendix 8**) (**AOC #4**).

40 C.F.R. § 68.81 Incident Investigations – I reviewed incident investigations conducted by Chemours La Porte within the past three years. Chemours La Porte investigated each incident, which resulted in, or could reasonably have resulted in a catastrophic release. Each incident investigation that I reviewed was initiated no later than 48 hours following the incident. After the investigation, Chemours La Porte prepared a report which included the date of incident, the date the investigation began, a description of the incident, the factors that contributed to the incident, and any recommendations resulting from the investigation.

40 C.F.R. § 68.83 Employee Participation – I reviewed Chemours La Porte's written plan of action regarding the implementation of employee participation at its facility. Chemours La Porte's written plan describes how they consult its employees and their representatives on the conduct and development of PHA and on the development of the other elements of process safety management regarding this rule and provides them access to PHAs and to all other information required to be developed under this rule.

40 C.F.R. § 68.85 Hot Work Permit – I reviewed hot work permits issued for hot work operations conducted on or near a covered process by Chemours La Porte in the past year. The permits documented that the fire prevention and protection requirements were implemented prior to beginning the hot work operations. They also indicated the date(s) authorized for hot work and identified the object on which hot work was performed. The permit was kept on file until completion of the hot work operations.

Chemours La Porte requires employees to obtain two approving signatures before beginning work, but I identified 12 of 55 instances when only one approver was designated (**AOC #5**). After the inspection, Chemours La Porte provided a revised hot work procedure as well as employee training documentation that ensures employees are now properly carrying out the hot work procedure (**Appendix 9**).

40 C.F.R. § 68.87 Contractors – I reviewed Chemours La Porte's procedure for selecting and evaluating contractors. Chemours La Porte requires each potential contractor to complete a prequalification self-assessment through which they obtain and evaluate information regarding the contract owner or operator's safety performance and programs. Before beginning work at Chemours La Porte, contract employees must attend the Houston Areas Safety Council to learn about the known potential fire,

explosion, or toxic release hazards related to the contractor's work and the process. Chemours La Porte periodically evaluates the performance of the contract owner or operator in fulfilling their obligations.

Subpart E – Emergency Response

40 C.F.R. § 68.90 Applicability – Chemours La Porte employees are first responders that respond to fires and releases onsite.

40 C.F.R. § 68.95 Emergency Response Program – I reviewed Chemours La Porte emergency response plan (**Appendix 4**). According to its response manual “Emergency Planning and Response is executed through two primary means: 1) Landlord (DuPont) Managed Emergency Services and 2) Chemours Specific response plans and actions.” Chemours La Porte maintains a Service Level Agreement with Dupont that outlines which emergency response activities Dupont is responsible for. Chemours La Porte is a member of Channel Industries Mutual Aid (CIMA), a non-profit organization combining the fire-fighting, rescue, hazardous material handling, and emergency medical capabilities of the refining and petrochemical industry in the Greater Houston Metropolitan Area. Its emergency responders receive annual HAZMAT training at Industrial Rescue Instruction Services.

Chemours La Porte's emergency response plan included procedures for informing the public and local emergency response agencies about accidental releases and procedures and measures for emergency response after an accidental release of a regulated substance as well as the medical response protocols describing proper first-aid and emergency medical treatment necessary to treat accidental human exposures. It also contained procedures on the use of emergency response equipment and for its inspection, testing, and maintenance. I reviewed the inspection and testing record to ensure that they were being done as detailed in the plan.

Subpart G – Risk Management Plan

40 C.F.R. § 68.190 Updates – Chemours La Porte completed its first time RMP submission on May 16, 2015. Its next RMP re-submission is due by May 16, 2020, unless an update or correction is required by 40 CFR § 68.190 and 40 CFR § 68.195

40 C.F.R. § 68.195 Required Corrections – Prior to my inspection, I tried to contact facility representatives using the information found in Chemours La Porte's RMP submission. After getting no response from the person responsible for RMP implementation, I tried calling the 24-hour emergency contact. This number directed me to the onsite security office that provides security for several co-located facilities, including Chemours La Porte. The security officer was not able to get me in contact with the emergency contact at the facility. Chemours La Porte is required to designate a facility representative to serve as its emergency contact and update its RMP with this information within one month (**AOC #5**). After the inspection, Chemours La Porte updated its emergency contact information.

Section III – AREAS OF CONCERN

During the closing conference, the following areas of concerns were discussed.

1. **40 C.F.R. § 68.39** requires the owner or operator to maintain the following records on the offsite consequence analyses: (a) For worst-case scenarios, a description of the vessel or pipeline and substance selected as worst case, assumptions and parameters used, and the rationale for selection; assumptions shall include use of any administrative controls and any passive mitigation that were assumed to limit the quantity that could be released. Documentation shall include the anticipated effect of the controls and mitigation on the release quantity and rate. (b) For alternative release scenarios, a description of the scenarios identified, assumptions and parameters used, and the rationale for the selection of specific scenarios; assumptions shall include use of any administrative controls and any mitigation that were assumed to limit the quantity that could be released. Documentation shall include the effect of the controls and mitigation on the release quantity and rate. Chemours La Porte failed to maintain all of the required OCA documentation as outlined in the regulation.
2. **40 C.F.R. § 68.54(b)** requires refresher training to be provided at least every three years, and more often if necessary, to each employee operating a process to ensure that the employee understands and adheres to the current operating procedures of the process. Chemours La Porte failed to provide two employees with refresher training in March 2018.
3. **40 C.F.R. § 68.75(c)** requires employees involved in operating a process and maintenance and contract employees whose job tasks will be affected by a change in the process to be informed of, and trained in, the change prior to start-up of the process or affected part of the process. Chemours La Porte failed to inform and train employees in a change prior to start-up of that process.
4. **40 C.F.R. § 68.69(d)** requires the owner or operator shall develop and implement safe work practices to provide for the control of hazards during operations. Chemours La Porte failed to implement its hot work procedure.
5. **40 C.F.R. § 68.160(b)(6)** requires the owner or operator to include in its RMP the name, title, telephone number, and 24-hour telephone number of the emergency contact. **40 C.F.R. § 68.195(b)** requires the owner or operator to submit a correction of that information within one month of the change. Chemours La Porte failed to designate a proper emergency contact in its RMP.

Section IV – FOLLOW UP

On September 26, 2018, Shannon Davis sent a follow up e-mail with additional information which is detailed throughout the report.

Section V – LIST OF APPENDICES

- Appendix 1 – Inspection Sign-in Sheet
- Appendix 2 – OCA Documentation (FU)*
- Appendix 3 – Training Records received during inspection
- Appendix 4 – Training records (FU)
- Appendix 5 – Example MOC Training Documentation
- Appendix 6 – Revised MOC Training Procedure
- Appendix 7 – Compliance Audit Schedule
- Appendix 8 – Compliance Audit Certification Statement
- Appendix 9 – Hot Work Procedure and Training (FU)

*FU denotes follow up documentation received after the inspection.

Appendix 1

Inspection Sign-in Sheet

Chemours La Porte Plant

Opening Conference Sign-In Sheet

Name	E-mail	Phone #
Kayla Buchanan	klb b Buchanan.Kayla.Cepa.gov	281-417-6480
Don Kuhlmann	donald.r.kuhlmann@chemours.com	361-230-0404 cell 281-417-7800 office
James Gallen	James.O.Gallen@chemours.com	281-417-7824
STEVEN COFFMAN	STEVEN.D.COFFMAN-1@CHEMOURS.COM	361-776-6731
Bubba Cooper	richard r-bubba.cooper-1@chemours.com	281-417-7800
Shannon Davis	Shannon.DAVIS@chemours.com	281-417-7784
Sharon Cantu	sharon.cantu@chemours.com	281-417-7781
Sid Sylvalie	Sidique.M.Sylvalie@chemours.com	281-417-7816
Larry Schwarz	larry.d.schwarz@chemours.com	281-417-7809
JAMES CRAWTHER	james.kent.crawther@chemours.com	281-417-7819
Rich Lypps	Richard.L.Lypps-1@chemours.com	281-417-7819
Joe Garcia	Joe.L.Garcia@chemours.com	281-417-7842
JOHN COUCH RE.	JOHN.F.COUCH-1@CHEMOURS.COM	281-417-7814
Brad Watson	Bredley.R.Watson@chemours.com	559-681-5799
Ariana Cornwell	ARIANA.M.CORNWELL@CHEMOURS.COM	240-678324

Plant Manager

Health & Safety / PSM lead
EHS (corpus christi)

Document control / Admin

EHS specialist

HF Technology Guardian

HF AREA SPECIALIST

Sn Inspector

Appendix 2

OCA Documentation (FU)

Not included in online version of report to
preserve sensitive information.

Appendix 3

Training Records received during inspection

Not included in online version of report to preserve personal identifiable information of employees.

Appendix 4

Training Records (FU)

Not included in online version of report to preserve personal identifiable information of employees.

Appendix 5

Example MOC Training Documentation

TITLE: Upgrade MOC Lime Contactors Top HeadsDATE: 10/20/2017ORIGINATOR: NGUYEN TRANComplete each of the following sections. If not applicable, mark N/A. Utilize additional pages if necessary.*** Present Conditions and Purpose of Change:**

Currently, the top head of the lime contactors have severe impingement corrosion. The material of construction of the top head is Alloy 20. To prolong the service life of the top head with minimum cost of maintenance repair, Hastelloy C2000 is the proposed material to replace Alloy 20.

***Description of Proposed Change and how process technology will be changed:**

Upgrade material of construction of the lime contactor top heads from Alloy 20 to Hastelloy C2000.

***Technical Basis for Change (include why change is safe to implement):**

The design of the top head remains as-is. Only MOC is upgraded.

***RAGAGEP and/ or Standards & Guidelines being Followed:**

RAGAGEP

Safety, Health, and Emergency Response & Planning Impact: N/A**Environmental Impact: Prevent HF leak out at Lime Contactors due to corrosion.**

Cost Impact/Quality Impact and/ or Production Impact: N/A

MI/QA Impact: Improve the Material of Construction of Lime Contactors top heads**Training/Communication Required (how and by whom):**

- TYPES: A - No communication/training required
 B - Informal communication (i.e. email or verbal)
 C - Change log book or change notice
 D - Documented formal training (Classroom or TLM's)

If formal or documented training required, provide a training sheet of all individuals who require formal training. This training sheet is to be included in closing documentation with all signatures or follow up action item for missing signatures.

WHO TO COMMUNICATE TO	TYPE OF COMMUNICATION

*** List Operational Procedures / Technical Standards to be updated (attach draft):**

Appendix 6

Revised MOC Training Procedure

Chemours 15

TO: DOCUMENT CONTROL ADMIN ASSISTANT

FROM: Whitney Jansen

DATE: 7/16/2018

REQUEST TO CHANGE - EHS PROCEDURE

TITLE OF DOCUMENT TO BE CHANGED:

PSM Manual: Section 10B: Change of Design (COD) Procedure
PSM-SECTION-10B-ATTACHMENT A-COD Authorization Form

DESCRIPTION OF CHANGES:

Update procedure and Authorization page to require training, in some form, for all CODs that take place.

BASIS FOR CHANGE:

Follow up item from 2018 PSM audit.

***ATTACH A COPY OF THE CONTROLLED DOCUMENT TO BE CHANGED, CLEARLY STATING THE REQUESTED CHANGES.**

REVIEWED AND APPROVED BY:

WHITNEY JANSEN

Procedure Steward (Print)

Signature

Date

Carlos Cortez

Union Representative (Print)

Signature

Date

JAMES GALLION

EHS Representative (Print)

Signature

Date

FRANK LUNKWITZ OR WHITNEY JANSEN

Management Sponsor (Print)

Signature

Date

MARK REYES

Plant Manager or Designee (Print)

Signature

Date

Whitney Jansen

7-16-18

Carlos Cortez

7-26-18

James Gallion

7/26/2018

Whitney Jansen

7-16-18

Mark Reyes

8/14/18

Page 2

1. Enter COD/TCOD number, title, originator, and date.
2. Complete sections if applicable:

Review of Present Conditions and Purpose of Change – This section should provide approvers with a brief summary of the present conditions necessitating the change and should explain the objective(s) of the change.

Description of Proposed Work- This section provides detail description of the proposed work, indicating how the process technology (hazards of process, equipment design basis, and process design basis) is being modified, including impacts to existing safety systems and lines of defense. For mothballed equipment, this section should have a clear description on how it will be de-energized and maintained.

Technical Basis for Change – This section should include “**why the change is safe to implement**” by documenting what part of the process technology is being changed and how. This should be based on laboratory results, engineering evaluations, and/or vendor/supplier data. This section should also identify the technology basis to address changes involving HTM's. If the process technology is not being changed, a statement of that fact is required. **This section cannot be left blank.** Include the RAGAGEP referenced or where applicable RAGAGEPs do not exist, include the referenced Chemours internal standards and guidelines.

Safety, Health Emergency Planning and Response Impact - This section should include a discussion of the all safety, health, and emergency planning and response considerations. This section should reference the project hazard screening method used to determine the appropriate safety review (i.e., COD Checklist, PHA, etc.). The documented safety review should be complete prior to and circulated with the COD for approval. Also, included in this section should be the impact this change will have on Emergency Planning and Response (EPR). The EPR discussion should include any impact this change will have on fire protection systems, early warning systems (alarms & Toxic detectors), temporary shelters, or emergency power systems.

Environmental Impact - This section should discuss the impact this change will have on the environmental footprint of the operating unit. It should discuss if there will be any changes to equipment containing volatile organic compounds or changes in operating limits that will affect air, waste or wastewater permits.

Cost Impact and Quality Impact- Originators should identify any cost impact or quality impact related to the change. This impact should be quantified in terms of additional or reduction to cost, or the quantities or change in quality specification of the product from this change. This impact is not limited to final product.

MI/QA impact – If applicable, originators are required to provide QA strategy and/or QA plans for any new PSM critical equipment/components. This QA strategy must be attached with the design transmittal package. See the site MIQA manual for QA strategy definition and requirements. Also included in this section will be documentation on the impact on the mechanical integrity program. Any changes to corrosion rates, predicted failure mechanisms, equipment test and inspection methods or frequencies, and maintenance procedures should be described/ listed in this section.

Training/Communication Required - Identify training required for technical, operators & mechanics in relationship to the change. Training and communication is required to be completed prior to startup of the change. All CODs should have some form of training, whether it be formal training or just an awareness of the change that was made. This needs to be documented in the COD folder.

List OP's/Tech Standards to be updated. - These are the identified sections of operating procedures or technical standards that require updating as a result of this change. The changes to the procedures/standards must be completed and issued prior to the startup of the change.

Those sections marked by an asterisk* are mandatory per Chemours Standard S21A and must be completed. Note that Wilmington projects are not exempted from having a COD required. However, this information on the COD form would be redundant with the project write-up. In that case, the text of the project write-up can be attached or referenced with file location. This ensures that changes are tracked and easily accessible for audits and PHAs.

PSM - Section 10B- Attachment A - CDD Authorization Form

ATTACHMENT A

C.O.D. ☐ T.C.O.D. ☐ No. Enter COD#

TITLE: [Title]

DATE: Date

ORIGINATOR: [Author]

Complete each of the following sections. If not applicable, mark N/A. Utilize additional pages if necessary.

*** Present Conditions and Purpose of Change:**

Enter text

***Description of Proposed Change and how process technology will be changed:**

Enter text

***Technical Basis for Change (include why change is safe to implement):**

Enter text

***RAGAGEP and/ or Standards & Guidelines being Followed:**

Enter text

***Safety, Health, and Emergency Response & Planning Impact:** Enter Impact

***Environmental Impact:** Enter impact

Cost Impact/Quality Impact and/ or Production Impact: Enter impact.

***MI/QA Impact:** Enter impact

***Training/Communication Required (how and by whom):**

TYPES: A- ~~No communication/training required~~

A- Informal communication (i.e. email or verbal)

B- Change log book or change notice

C- Documented formal training (Classroom or TLM's)

If formal or documented training required, provide a training sheet of all individuals who require formal training. This training sheet is to be included in closing documentation with all signatures or follow up action item for missing signatures.

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WHO TO COMMUNICATE TO	TYPE OF COMMUNICATION

*** List Operational Procedures / Technical Standards to be updated (attach draft):**

Appendix 7

Compliance Audit Schedule

[illegible]

Appendix 8

Compliance Audit Certification Statement

Attachment "C"
Page 1 of 1

PSM Standard S21A
OSHA Compliance Audits

Appendix C—OSHA requirements—PSM of Highly Hazardous Chemicals (29 CFR 1910.119, 2/24/92)

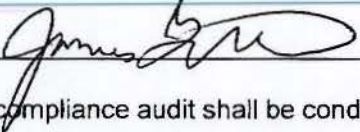
U.S. sites shall follow the mandatory regulatory requirements described in this appendix. Sites should review the full OSHA PSM rule and OSHA-related interpretations for additional requirements and technical guidance on their PSM programs.

C.6 Compliance audits [Last revised 5/07]

Employers shall certify that they have evaluated compliance with the provisions of this section, at least every three years, to verify that the procedures and practices developed under the standard are adequate and are being followed.

Suggested certification language is shown in the following paragraph:

The (insert name) process was evaluated for compliance with OSHA 29 CFR 1910.119 on (insert date). The audit report is attached.

Signed:  Date: 11/21/2017

- The compliance audit shall be conducted by at least one person knowledgeable in the process.
- When audits are conducted by an audit team leader and audit team members who are not knowledgeable in the process (i.e., from outside the unit being audited), the audit shall begin with a description of the PT, including a field tour, to help ensure that at least one member of the audit team is knowledgeable in the process.
- A report of the findings of the audit shall be developed.
- The employer shall promptly determine and document an appropriate response to each of the findings of the compliance audit and document that deficiencies have been corrected.
- Employers shall retain the two most recent compliance audit reports.

Appendix 9

Hot Work Procedure and Training (FU)



E.H.S Bulletin



Chemours™

La Porte Facility- Fluoroproducts

Hot Work Procedure Update

SB: 18-01
Date: 9/19/2018
Author: J. Gallion



During a recent compliance audit, it was identified that we are not consistent with authorizing and closing Hot Work Permits. Hot Work Permits are highly regulated under both OSHA's PSM Standard as well as the EPA's RMP Standard.

In an effort to improve consistency and clarify site requirements the site Hot Work procedure was revised to say the following in regard to permit authorization-

6. Permit Approvals

All Type A and Type B Hot Work permits must be authorized by two operators. The permit approver is the operator who inspects the work location and conducts the atmospheric test. This person will authorize the Hot Work activity by signing on the "Permit Approver" line on the Hot Work permit. A second operator is required to sign on the "Proprietor Group" line on the Hot Work permit.