



This document provides chemical hazard information for regulated processes in accordance with 40 CFR part 68, Risk Management Program requirements.

Facility: Rubicon LLC	Address: 9156 Highway 75 Geismar, LA 70734	County: Ascension Parish	RMP ID: 100000146781
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List of Regulated Substances in processes:

(Note: Safety Data Sheet for regulated substance is included)

Chemicals		Chemicals in a Flammable Mixture			
Ammonia					
Chlorine					
Ethylene Oxide					
Formaldehyde					
Propylene Oxide					
Phosgene					

5-Year Accident History information as reported under 40 CFR 68.42:

Rubicon has had four RMP reportable incidents in the last 5 years. They are described below:

On October 29, 2014, a tubing leak developed on a process instrument on the recovery column feed pump in the MDI 1 unit that released a mixture of chlorobenzene and phosgene. The release lasted fifteen minutes during which 0.2 pounds of chlorobenzene and 0.8 pounds of phosgene were released to the air. The Ascension Parish Sherriff's Office was notified of a site alert that is expected to impact offsite receptors. One public road was closed during the release as a precautionary measure. During the emergency response, a Rubicon production technician received first and second degree burns to his hands. He was sent to the Baton Rouge General burn unit and released later that day

On November 11, 2015, the MDI 3 unit lost power to its Distributive Control System (DCS) while maintenance activities were being performed on the MDI 3 Uninterrupted Power Supply (UPS) system. This temporary power loss resulted in a vapor release of phosgene from vents on two MDI 3 test tanks and a monochlorobenzene (MCB) storage tank. The release lasted approximately forty minutes and released 0.7 pounds of phosgene vapor. The Ascension Parish Sherriff's Office was notified of a site alert that is expected to impact offsite receptors. The surrounding industrial facilities were instructed to shelter in place.

On April 6, 2016, a leak on the MDI 1 C Phosgene Reactor cooling water system released a gaseous phosgene/chlorine/carbon monoxide mixture to the air due to a reactor tube failure. The release lasted two minutes and released 0.6 pounds of phosgene, 1.5 pounds of chlorine and 0.8



pounds of carbon monoxide. Chlorine is not held above the threshold quantity in the MDI 1 unit. During the emergency response a Production Technician was exposed to phosgene. He was transported to St. Elizabeth Hospital where he received treatment for phosgene exposure. He was released later that night and returned to work on April 7, 2016. The Ascension Parish Sherriff's Office, the Louisiana State Police and the Louisiana Department of Environmental Quality were notified when the Production Technician was transported to the hospital.

On April 21, 2016, a release occurred from a bleed valve in the MDI 2 unit while clearing a pump for planned maintenance the following day. A liquid mixture of chlorobenzene, methylene diphenyl diisocyanate (MDI), phosgene and hydrochloric acid (HCl) was released. 0.62 pounds of phosgene and 0.1 pounds of chlorobenzene were released to the air from the spill pool. The rest of the liquid mixture was contained within the unit. Two Production Technicians were exposed to the liquid mixture. Both Production Technicians were transported St. Elizabeth Hospital and were treated for phosgene exposure. One Production Technician was also treated for burns. As a precautionary measure, the Production Technicians were transported to Louisiana State University Health Science Center (LSU HSC) in Shreveport, LA for further monitoring. Both Production Technicians were released from LSU HSC and were cleared to return to work on April 22, 2016. The Ascension Parish Sherriff's Office was notified of a site alert that was not expected to impact off site receptors. The Ascension Parish Sherriff's Office, the Louisiana State Police and the Louisiana Department of Environmental Quality were notified when the Production Technicians were transported to the hospital.



Emergency Response Program information:

Rubicon is a responding facility. Information on Rubicon Emergency Response Program is discussed below.

Rubicon's emergency response program is based on the philosophy of prevention, preparation and response. Some practices at Rubicon for preventing situations that could possibly lead to an emergency incident are the use of good engineering design and nationally accepted standards, conducting process hazard analyses, safety procedures, the management of change system, unit operating policies and procedures, continuous process control and monitoring, inspection and testing of equipment and preventative maintenance of equipment. The second and third elements of Rubicon's emergency response program are preparation and response. Preparing for emergency situations at Rubicon includes exercises and drills for the training of the internal emergency response units. The internal emergency response units are the Fire Brigade, HAZMAT personnel with equipped van, medical first responders with equipped ambulance and a first aid station with nurse, and teams specializing in vertical and confined space rescues. Formal written fire and release preplans have been developed to assist training and drill scenarios. A plant-wide evacuation drill for all employees is performed at least once per year.

Another important aspect of preparation for an emergency is communication. Rubicon has the following internal communication systems: 888 emergency notification telephone system, two way radios, public announcement system in the units, fire alarms, gas alarms, telephones, cellular telephones and faxes. External communication systems include the Community Awareness Emergency Response (CAER) radio, the telephone system with backup switch and power, cellular telephones, and the use of 911. Upon using the CAER radio or 911, Rubicon coordinates with the Ascension Parish Sheriff's Office (APSO) the activation of all or part of the CAER emergency sirens that are designed to be heard within an approximate radius of 2.5 miles of each plant in the area where the CAER chemical facilities are located. This coordination can also activate the computerized Emergency Telephone Alerting System provided by the Community Alert Network (CAN) and the Emergency Broadcast System (television and/or radio) for Ascension Parish. These external communication systems inform and coordinate efforts with neighboring chemical plants, the Ascension Parish Sheriff Department, Ascension Parish Office of Homeland Security and Emergency Preparedness, the Louisiana State Police and/or the general public.

Rubicon works closely with outside authorities and other neighboring companies to coordinate emergency response. These authorities are Louisiana State Police, Ascension Parish Sheriff Department, Ascension Parish Office of Homeland Security and Emergency Preparedness, Geismar Fire Department, Prairieville Fire Department, Red Cross, St. Elizabeth Hospital (Gonzales), Our Lady of the Lake Regional Hospital (Baton Rouge), Baton Rouge General Medical Center (Baton Rouge), Summit Hospital (Baton Rouge) and the Industrial Mutual Aid Group (IMAG). The Ascension Parish Office of Homeland Security and Emergency Preparedness has the ability to facilitate the activation of the National Guard Civil Support Team to respond to an on-site emergency. IMAG also has reciprocal agreements for equipment exchange with the St. James Mutual Aid and Baton Rouge Area Mutual Aid Systems. Rubicon performs annual training with most of these organizations or provides information necessary for coordinated emergency response.

Rubicon has also developed formal emergency action plans such as the SPC/SPCC Plan, RCRA Contingency Plan, and the One Plan for emergency situations. Rubicon also has emergency internal procedures that address Emergency Action and Crisis Management, Emergency Brigade, 888 Emergency Notification Telephone System, Radiation Sources, Plant-wide Evacuation, Bomb Threats, and Hurricanes and Parking Area Emergency Notification System. Preplanned emergency responses are practiced and are used during release drill scenarios. Other response practices include utilizing wind socks to determine wind direction, the SAFER System for air dispersion modeling of a toxic gas release, sampling on-site and off-site by HAZMAT response personnel, the phosgene detection monitoring system in occupied buildings, water deluge systems for fire and toxic air release suppression, equipment and operating unit shutdown systems and waste handling procedures.



Scheduled Exercises:

Exercise	Frequency	Participating Party
Fire Drill	Weekly	Rubicon Emergency Brigade
Evacuation Drill	Annually	All personnel on Rubicon Site
CFATS Security Drill	Annually	Rubicon, Ascension Parish Sheriff's Office

LEPC Contact Information/Community Preparedness:

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