Decatur Site
2012 External Health, Safety, Security & Environmental Statement

Verified Site Report

Including details of the environmental, health, safety & security performance and programs for the BP Amoco Chemical Company Decatur Site in 2012

5/17/2013
Foreword

The BP Decatur Site is committed to effective management of health, safety, security, and environmental (HSSE) issues, including responsible stewardship of the environment and natural resources.

This commitment is demonstrated through the day-to-day core company values on safety and protection of the environment. The site embeds this through the implementation of a Decatur Site version of the BP Corporate Operating Management System (OMS) and widespread communication of BP’s vision of “no accidents, no harm to people and no damage to the environment.”
**Introduction**

The BP Decatur Site has adopted Health, Safety and Environmental Policies. The policies are a broad statement of BP’s commitment to outstanding HSE performance and are the foundation of the HSSE philosophy employed at the Decatur Site. The Health, Safety and Environmental Policies are endorsed by the Site Manager.

The Local Operating Management System (LOMS) describes the system used to manage and improve performance at Decatur, including HSSE performance. The LOMS details the responsibilities of management, employees, and contractors for managing risk and improving performance. The overall responsibility for HSSE management lies with the Site Manager and HSSE Manager, while the Site Leadership Team (LT) is responsible for oversight of the LOMS and the compliance program. As is made clear in the LOMS Management System documentation, *all employees and contractors working at the BP Decatur Site are directly responsible for HSSE performance.* The Decatur Site management system follows the Performance Improvement Cycle of "Intent, Risk Assessment and Prioritization, Planning and Controls, Implementation and Operations, Measurement, Evaluation, and Corrective Actions, and Management Reviews and Improvement."

The Training and Awareness requirements of the OMS help to ensure that all employees, whether administrative, manufacturing, or support staff, consider the potential health and safety risks, environmental impacts and legal requirements of their particular jobs, and what to do to minimize impacts and deliver compliance. This awareness is achieved through communications, education, training, and experience, and is supported by HSSE and operational procedures, work practices, monitoring and measuring, and auditing.
The efficacy of these systems is verified through internal and external audits.

The BP Decatur Site Safety and Health Policy is reproduced below:

**Safety & Health Policy Statement**

Management at the Decatur Site considers no phase of operation or administration as being of greater importance than our employee’s safety and health. It is our policy, therefore, to provide and maintain safe and healthful working conditions, and to follow operating practices that will protect employees and result in safe working conditions, as well as efficient operations.

Accident prevention, quality, and efficient production go hand-in-hand. Each level of management has a primary responsibility for the safety of its employees. This responsibility can be met only by working diligently to promote a safe work culture and to require that property and equipment be maintained in a safe operating condition.

The adherence to safe work practices by every employee is a condition of employment. No job shall be attempted unless each employee has followed every reasonable precaution and safety rule to protect fellow employees and themselves. It is the responsibility of each employee to know and observe all HSSE regulations. Failure to do so will be considered a serious matter, and appropriate action will be taken.

The safe, efficient conduct of our tasks is essential.

The BP Decatur Site Environmental Policy is reproduced below:

**Environmental Policy**

BP Decatur Site is committed to producing quality chemical products with minimal impacts to the environment and natural resources. Therefore, we commit to continually improve our environmental effectiveness and performance by:

- Driving down the environmental impacts of our operations by reducing waste, emissions, discharges and energy consumption.
- Complying fully with all applicable environmental laws and regulations produced by federal, state, and local agencies.
- Ensuring that all employees, contractors and others are informed, trained, engaged and committed to the environmental improvement process.
- Developing environmental objectives and targets utilizing the planning process.
- Incorporating environmental provisions into business decisions, including expansion, renovation, and acquisition activities.
- Maintaining public confidence in the integrity of our operations by openly reporting our performance and consulting with people outside the company to improve our understanding of external and internal environmental issues associated with our operations.
Description of our operations

The BP Decatur Site is located on 1,000 acres of land on the south bank of the Tennessee River in Northern Alabama. The plant employs approximately 475 people, plus an average of 250-350 contractors.

We are a world scale manufacturer of purified terephthalic acid (PTA) and its basic raw material, paraxylene (PX), and are also the world’s only commercial scale producer of naphthalene dicarboxylate (NDC). PTA is the preferred feedstock used in the manufacture of polyester resin for fibers, films, packaging, and engineering resins. PX in turn is mainly used as a feedstock in the production of PTA. NDC is a specialty monomer which is the foundation for a new generation of versatile, high performance polyesters and specialty resins. NDC is used in such varied applications as food and medical packaging, data storage, LCD screens, high performance automobile and motorcycle tires, and suntan lotion.

The BP Decatur Site is committed to operational excellence with no accidents, no harm to people and no damage to the environment. We aim to be both the lowest cost and most reliable producer, delivering high returns and creating growth opportunities for BP.

Safety and Environmental Stewardship: BP’s commitment to health, safety, security and environmental performance is simply stated in our goal of no accidents, no harm to people, and no damage to the environment. Providing a safe and healthy environment for all employees and contractors is critical. This is reflected in our commitment to continuous improvement in all HSSE areas.

Community Involvement: BP links up with BP Foundation and Fabric of America, where we are able to contribute to charitable organizations. In addition, our employees participate in a variety of organizations such as the United Way, Relay-for-Life and others. In 2001, BP partnered with the Decatur City School System to create the Wetlands Edge Environmental Center (WEEC). Located on BP’s 530 acre wildlife habitat, WEEC provides hands-on environmental educational opportunities to local students.

Each year BP Decatur and its employees generously donate volunteer time and funding to the United Way, Northern Alabama schools, chambers of commerce and numerous non-profit organizations, to name a few.

In 2012, the site donated $180,000 to 23 organizations, including Decatur Cities Schools Foundation, United Way agencies, Wetlands Edge Environmental Center and the Morgan County Veteran’s Memorial.

To develop future workers and leaders, BP Decatur reaches out to local colleges and universities to find candidates for its co-op and intern programs.
In 2012, BP Decatur employees donated $134,000 to 179 local and national non-profit and educational organizations through the BP Fabric of America program. BP's Fabric of America Fund enables each US-based BP employee to designate $300 in company dollars to a non-profit organization of their choice within the US. BP Decatur employees also generously give their time. They helped neighbors recover after the 2011 tornado, supported the Decatur High School Partners-In-Education program and cleaned up Decatur households, and participated in ChemiCollection Day household hazardous waste collection events, just to mention a few. You'll also see the BP logo on BP Decatur volunteers at the annual American Cancer Society Relay for Life and other fund-raising events.

**How we identify and manage important Health, Safety, Security, and Environmental impacts**

HSSE impacts at the Decatur Site are identified in several ways. These include; periodic identification of OMS gap/risk assessments and environmental aspects through the ISO 14001 management system, requirements imposed by state and/or federally issued permits and programs, corporate requirements, review of past incidents to identify recurring problems or trends, and other established safety and environmental programs.

Decatur conforms to the ISO 14001-2004 standard and includes a procedure for the identification and significance assessment of environmental aspects and impacts.

State and/or federally issued legislation, regulation, and/or permits and programs set minimum compliance expectations for BP.

The BP OMS Framework, BP Group Defined Practices, the BP Code of Conduct, and the greenhouse gas reporting program all ensure consistency of local management systems globally throughout the BP corporation.

Incidents are investigated to determine the root cause, with actions taken to prevent recurrence. Lessons-learned from incidents at other sites are also assessed and actions completed, as appropriate, to prevent occurrence at Decatur Site.

Employee involvement is critical to deliver HSSE results with programs directed to promote visible leadership and engagement of the entire workforce in HSSE programs. Site involvement programs include Safety Observation Programs, Advanced Safety Audits, Process Safety Management Programs and employee participation in HSSE committees.

Site management also takes a very active role in the delivery of HSSE results. The Site Leadership Team performs periodic program audits, mentors Safety and Environmental Project Teams, and participates in Safety Audits where appropriate.
During 2012 the Decatur Site completed the roll-out of the BP Group Defined Practice on Accident Investigations, HSSE Reporting, and Decatur continued to manage the requirements of the BP Control of Work Standard, BP Driving Standard and the BP Integrity Management Standard.

Examples of some of the prominent HSSE issues and performance results of the Decatur Works site are given in the following section.

**Our impacts and performance**

The following are some of the key HSSE issues being addressed at the Decatur Site:

<table>
<thead>
<tr>
<th>Issue: Site Safety Performance</th>
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<tbody>
<tr>
<td>• Ensuring no harm to people</td>
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<tr>
<td>• Compliance with all legal requirements</td>
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<tr>
<td>• Implementation of Group Safety Standards</td>
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<td>• Learning lessons from other sites</td>
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**Impact**

Working safely at the BP Decatur Site impacts not only BP employees and contractors, but their families and loved ones as well. Providing a safe workplace is a core value throughout BP and is embedded in all of the work practices and processes at the Decatur Site.

**Management**

**Operational controls:**
Site HSSE is addressed in all aspects of our work. HSSE issues are addressed in: operating procedures, work planning, training, contractor orientation and evaluation, communication of lessons learned from other BP sites, project planning, and workforce involvement programs.

**Objectives and targets:**
The goal for injuries and illnesses is, naturally, zero. Numerical targets are established to focus on improvement. Our objective remains “…no accidents, no harm to people…”

**Audits and Assessments:**
During 2012 the Decatur Site experienced 5 OSHA recordable injuries involving contractors, and 2 OSHA recordable illnesses which involved BP employees. While injuries are not acceptable, it is nevertheless encouraging that the frequency of injuries at the site has been declining for the past several years and this was the best year for the Decatur site. In addition, the site reached 4.4 Million Safe Work Hours without a Day Away From Work Case. In addition, the Site conducted 4 major turnarounds (TARs) during 2012 with minor incident/injuries. The Decatur Site also continued to
conduct audits and assessments throughout the site, which included:

- Supervision’s Safety Audits, Tri-Fold Audits, Safety and Health Program Audits, and HSS Committee Safety Regulation Reviews.
- There were approximately 4,698 audits conducted during the year.
- A gap assessment for the BP LOMS implementation, Control of Work Practices, the Site’s Investigation/Reporting requirements and the Site’s Hazard & Operability Review (HAZOP) process.

**Performance**

During 2012 the BP Decatur Site experienced 5 OSHA recordable injuries which were all related to contractor employees. In addition, the site had 2 OSHA recordable illnesses which came out to be an OSHA Recordable rate of 0.38. Even though there were several injuries during the year, we see that the OSHA Recordable Incident Rate trend for the past several years has been improving.

![Graph showing OSHA Recordable Rate](image)

The site seeks to involve everyone in delivering HSSE programs to comply with legal and corporate requirements, and improve performance.

2012 programs and accomplishments included the following:

- The Contractor Program was re-evaluated and enhanced to a new system called PICs which will assist the site in establishing a systematic way for the selection of qualified contractors.
- The current Lessons Learned Process is being enhanced to make it more systematic and to ensure that the incidents (including incidents external to Decatur Site) are imbedded into existing procedures, processes, etc.
- The site continued to roll out its’ Behavior Based Safety process to the site.
- The site continued to increase the reporting of near misses so that these incidents could be investigated and prevent more serious incidents/injuries.
- The site continued to enhance the site’s Compliance Audit System’s Tools.
- The site continued to focus on the Control of Work Process.

### Future plans

In 2013, BP Decatur Site will continue its focus on improving the safety and awareness of employees, contractors, and visitors. Building on the success of the programs that were implemented in the past we will:

- Develop a systematic way to communicate lessons learned from other sites, both within and outside of BP.
- Continue to maintain the OMS within the site.
- Increase the number of near misses reported.
- Continue to implement the Behavior Based Safety System.
- Continue to implement the BP Standards and Practices.

### Issue: Health and Wellness

- Ensuring no harm to people
- Compliance with all legal requirements
- Implementation of Group Safety Standards
- Learning lessons from other sites

### Impact

Creating a Healthy working environment at the BP Decatur Site impacts not only BP employees and contractors, but their families and loved ones as well. Providing a healthful workplace is a core value throughout BP and is embedded in all of the work practices and processes at the Decatur Site.

### Management

**Operational controls:**

Health related issues are addressed in all aspects of our work. They are reflected in: operating procedures, work planning, training, contractor orientation and evaluation, communication of lessons learned from other BP sites, project planning, and workforce involvement programs.

**Objectives and targets:**

The goal for injuries and illnesses is, naturally, zero. Numerical targets are established to focus on improvement. Our objective remains “…no accidents, no harm to people…”

**Performance**

During 2012 the BP Decatur Site experienced 2 recordable hearing losses. Hearing loss is a loss of 25 decibels or greater averaged at 2000 Hz, 3000 Hz, and 4000 Hz in one or both ears from the baseline test. The overall trend is still every good.
2012 Health and Wellness related programs and accomplishments included the following:

- The StayWell Health management program evaluates, manages, and aids in the maintenance of the health and wellness of employees and eligible retirees. Health advisors are available to provide information and coaching for issues such as weight management, tobacco cessation, stress management, nutrition, blood pressure, cholesterol control, back care, and physical activity.

- Repeated the weight loss program Scale Back Alabama. The goal is to have each individual on a team to lose at least 10 pounds during a 12 week time period.

- Continued the smoking cessation program including prescriptions for smoking cessation medications and reimbursement of initial co-pay, annual seasonal influenza vaccinations, blood pressure screenings, diet information, exercise information, PSA screenings, and weight screenings.

- Implemented “Fruit of the Day.” Everyone on-site is provided with a piece of fruit. This is to aid in encouraging healthy food choices.

- Fitness center re-imbursement is provided to include full reimbursement for the cost of either a family membership or individual membership.

- Continued contractor medical surveillance audit process with primary contractor.

- Continued use of Health Mapping Database to evaluate site health hazards.

- Completed the 2012 sampling strategy and medical surveillance plan for BP employees and on-site contractors.

- Continued to characterize the specific tasks and size of equipment that require double hearing protection.
Future plans

In 2013, BP Decatur Site will continue its focus on improving the health of the employees, contractors, and visitors. Building on the success of the programs that were implemented in the past we will:

- Update and implement sampling strategy and medical surveillance plan for BP employees and on-site contractors.
- Increase noise monitoring for all job titles.
- Continue to collect air monitoring data on our on-site contractors including KBR, Rescar, MTSI, EMS, etc.
- Continue to guide the on-site contractors with their medical surveillance programs and expand the audit process of their occupational health programs.
- Encourage use of information and programs available in the new corporate wellness initiative, StayWell Online implemented in January 2010.

Issue: Site Security and Emergency Response Performance

- The BP Decatur Works is a waterfront facility that is regulated by the Department of Homeland Security, the United States Coast Guard (USCG) and the U.S. Department of Transportation (USDOT).
- Decatur’s’ emergency response capabilities are driven by numerous requirements, including those of the USEPA, US OSHA, US DOT and, not least, BP.

Impact

Operating the BP Decatur facility in a safe and secure manner is a core value throughout BP and is embedded in all of the work practices and processes at the Decatur Site.

Management

Operational controls:
Security at the Decatur Site is managed through controlled access to the facility, a perimeter fence line that includes video surveillance of critical areas, and frequent communication with employees, contractors and regulatory entities.

Emergency response activities are a core value within the BP Decatur site and are controlled by a well trained Management Team as well as an Emergency Response Team.

Objectives and targets:

Although generally not published, there are both internally and externally driven targets for security preparation, performance, and assessment. These include the requirement for security
audits, training, plans and, if required, physical improvements to site security. The site’s ability to meet these requirements is periodically verified through drills and exercises.

Emergency response procedures are periodically reviewed and updated as needed. Like security procedures, the efficacy emergency response procedures and plans are verified through audits, drills and exercises.

**Assessment and Audit:**
During 2012 the Decatur Site hosted several US Coast Guard compliance inspections related to security, emergency response and DOT. The site also continued to manage the Coast Guard Transportation Worker Identification Credential (TWIC) Program as well as the requirements for the National Incident Management System (NIMS).

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<th>Performance</th>
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<tbody>
<tr>
<td>• Completed all scheduled security drills/exercises.</td>
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<td>• Completed all mandatory Emergency Response training/exercises/inspections.</td>
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<tr>
<td>• Completed all Maritime Transportation Security Act compliance requirements.</td>
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<tr>
<th>Future plans</th>
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<tr>
<td>The site will continue to meet or exceed the security and emergency response requirements of local, state, federal, international agencies and BP mandates. We are also preparing for the initial cycle of TWIC renewals with over 150 workers who require a reissuance of their TWIC credentials.</td>
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<th>Issue: Process Safety Management (PSM)</th>
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<tr>
<td>• Ensuring no harm to people through safe operations.</td>
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<tr>
<td>• Maintaining compliance with all legal, group, and local requirements associated with PSM.</td>
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<tr>
<td>• Evaluating site practices and procedures for compliance as new PSM related requirements are published.</td>
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<tr>
<td>• Learning lessons from sources internal and external to Decatur.</td>
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<td>Operating the BP Decatur Site impacts not only BP employees and contractors, but their families and loved ones as well. Operating safely is a core value throughout BP and is embedded in all of the work practices and processes at the Decatur Site.</td>
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<td><strong>Operational controls:</strong></td>
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| Process safety hazards are controlled through implementation of the PSM elements: incident investigations, process safety information, process hazard analysis, operating procedures, training, contractor management and evaluation, management of change/pre-startup safety reviews, mechanical integrity, safe work practices, employee involvement, hot work, emergency response and compliance audits. Decatur has site
specific procedures, programs and processes that utilize these elements as a foundation base.

**Objectives and targets:**
Decatur’s goal for process safety incidents is, naturally, zero. Numerical targets are established to focus on improvement. Our objective remains “…no accidents, no harm to people…”

**Audits and Assessments: update copy**
During 2012 the Decatur Site performed a series of internal/external audits and reviews that included:

- Audits of process safety elements embedded into the plant audit system.
- MOC audits performed by the Unit PSM Coordinators and the Site PSM Engineer.
- HAZOP Quality checks performed by HAZOP leaders and Site PSM Engineer.
- PSM Elements reviewed within the Site PSM Committee.
- PSM Element review lead by the site PSM Coordinator and presented to the PSM Unit Coordinators.
- Contractor evaluations performed by the contractor management group.
- Maintenance Work Orders audited to insure proper documentation within Management of Change.

## Performance

The site seeks to involve everyone in delivering the PSM Program to comply with legal and corporate requirements, and improve performance.

2012 programs and accomplishments included the following:

- Conducted HAZOP/LOPA training for site process safety engineers and HAZOP/LOPA facilitators and scribes.
- Conducted Major Accident Risk and Consequence Modeling training for site process safety engineers.
- Completed PSM training for 77 new hires.
- The site successfully completed all of the Safety and Operational Risk (S&OR) Audit findings on time.
Complete annual review of site risks with site leadership which included reviewing inspection results, action plans, safety instrumented systems.

Presented site’s Risk Management Plan during Neighbor’s Night.

Completed a deep dive on the qualifications of contractors that perform work on barriers associated with protecting from high risk.

The site reviewed all incidents for process safety applicability and included the required incidents in the Process Safety Index.

The site initiated 874 MOCs in 2012.

The site completed 39 Minor HAZOP/LOPA studies in 2012.

The site completed 6 major HAZOP/LOPA studies in 2012.

The site completed a new Major Accident Risk Assessment study.

Reviewed all risks identified in major HAZOP/LOPA studies with Site Management.

The site continues to utilize an on-line, real time tool to monitor process safety information, such as Safe Upper and Lower Operating Limits and other critical process safety elements. The tool is being utilized for a rigorous, efficient, and transparent review of performance on a daily basis.

Maintained a Site PSM Committee, including changing members to provide new perspective.

Continued with existing auditing process for Maintenance Work Orders.

Implemented an auditing process for temporary MOCs.

Implemented an auditing process for ensuring health and safety considerations are evaluated for all MOCs.

Completed the OSHA VPP Renewal Process in 2012.

Developed a new Emerging Risk Process for site risk identification.

Developed process for action plans generated from risk reviews to be incorporated into the annual operating plan.

Conducted gap assessments on site procedures based on BP guidelines.

Future plans
In 2013, BP Decatur Site will continue its focus on improving process safety performance and awareness of employees, contractors, and visitors. Building on the success of the programs that were implemented in the past we will:

- Continue to communicate lessons learned from other sites, both within and outside of BP.
- Increase quality of the PSM elements within the site’s audit system.
- Evaluate site practices and procedures for compliance as new PSM related requirements are published.
- Update Site Risk Management Plan.
- Execute the annual plan for conducting Major HAZOPs.
- Execute the annual plan for conducting Major Layer of Protection Analysis.
- Conduct HAZOPs on minor modifications.
- Review results of PSM scorecard with units during operational unit meetings.
- Continue to update unit Operating Procedures based on Document Control Procedure.
- Continue to review incidents for process safety applicability.
- Continue to review PSM dashboard which includes PSM leading and lagging indicators.
- Continue to Identify, assess and rank Site Risks according to a BP Group Practice and include them on the Site Risk Register.
- Conduct Management of Change Training on-site.
- Roll-out updated version of Management of Change Software.
- Develop list of Site Best Practices for PSM.
- Focus on reporting Loss of Primary Containment Incidents into reporting tool.
- Complete a deep dive on Corrosion Management.
- Complete 3 year PSM compliance audit lead by BP Safety and Operational Group (S&O).

**Issue: Site Environmental Performance**
• Minimize site environmental impacts by reducing waste, emissions, and energy consumption
• Compliance with all legal requirements

Impact
Minimizing environmental impacts at the BP Decatur Site is imperative to maintaining the site’s license to operate. Additionally, not only do BP Decatur Site employees work at the site, but they also live and raise families in the surrounding areas which underscores the importance of strong environmental performance.

Management

Operational controls: Operational controls for environmental compliance at the BP Decatur site include:

• Local Operating Management System and Environmental Management System meeting ISO 14001-2004 requirements.
• Properly maintained pollution control devices.
• Communication and training of compliance requirements (CBTs).
• Electronic monitoring and management of many compliance indicators.
• Operating procedures and management programs.
• On-going monitoring and measuring of performance.
• An audit and assessment Program including both internal (site) and external inspections and audits.
• Management of Change (MOCs).
• Compliance task tracking through the Essential Compliance Task Management System.
• Environmental staff monitors new and changing regulations through Cyber Regs notifications, participation in trade organizations such as Manufacture Alabama, and participation in corporate environmental work groups.
• An aggressive & effective Open-Ended Line (OEL) tracking and Leak Detection and Repair (LDAR) program.

Objectives and targets:
• The goal for environmental incidents is, naturally, zero. Numerical targets on environmental performance are established annually as part of the ISO 14001 EMS and tracked and communicated throughout the year to plant personnel.
Audits and Assessments:

- Decatur successfully completed a scheduled surveillance audit of the ISO 14001:2004 site through our external registrar auditor in 2012.
- An internal audit of the ISO14001 EMS was conducted in 2012 by off-site BP personnel with favorable results.
- ADEM conducted 9 environmental inspections across several different media during 2012. No significant issues were noted.

Performance

- Releases to the environment and reportable events to agencies are tracked through the BP Chemicals A&A matrix called Government Reportable Events (GRs). Reducing these types of events directly leads to our goal reducing our impact to the environment. There were 4 Government Reportable Events (GRs) in 2012 vs. a site target of less than ≤ 2. While Decatur strives to have minimal impacts on the environment, partially by setting ambitious environmental goals, 2012 proved to be a year of challenges.

The Essential Compliance Task Management System is the Decatur
management system that helps ensure that the site is in compliance with all legal and regulatory tasks. This tool can effectively measure, track, and notify management when compliance and legal task are not completed by their due date. This has allowed Decatur to develop a Key Performance Indicator (KPI) and track this monthly. Decatur met its target KPI > 96% in 2012 with a final task completed on time value of 98.6%.

- Decatur Site completed 1 Environmental Improvement project during 2012, vs. our goal of 2 projects. The project included:

  - Completion of the new anaerobic process waste reactor/digester system at Waste Treatment.

The Decatur site is continuing to implement projects that will allow the site to reduce natural gas usage in fired sources by burning more process generated fuels that would otherwise vent to a flare. Identifying ways to reduce the Site’s natural gas consumption will help continue control of CO2/methane emissions, which are suspected of contributing to climate change. Below is a 5 year trend for emissions of these compounds:
Tremendous progress has been made in recent years in the effort by Decatur Site to locate, repair, and ultimately prevent open-ended lines (OEL's) which could potentially emit regulated gases and/or liquids, result in safety risks, and potentially constitute violations of existing permits. As the following graph shows, Decatur Site progress in attacking OEL’s has been nothing less than spectacular in recent years, with a 99% reduction from 2007 to 2012.

![Graph showing 2007-2012 Open Ended Lines](image)

**Future plans:**

Decatur will continue to pursue reductions in impacts to the environment in 2013 and support the Capital Project process. In part, this will be achieved through the following planned activities and programs:

- Support plant projects: New Waste Water Treatment anaerobic system.
- The site is currently in the planning stages for future site projects that will dramatically reduce both steam usage and power. Projects are planned to improve energy efficiency throughout the site. In addition, they will reduce the load to the on-site waste treatment facilities.
- Minimize landfilling through continued recycling/waste diversion efforts.
- Seek beneficial reuse of 17,000 cubic yards of clean South Pond dredged soil to avoid landfilling.
- Implementation of new Oil Spill Response group defined practice procedure.
- Eliminate storage/use of #6 fuel oil on Decatur Site in favor of transition to cleaner backup fuel such as natural gas.
• Achieve compliance with new Reciprocating Internal Combustion Engine (RICE) and Boiler/Heater (see below) National Emission Standards for Hazardous Air Pollutants.

The Decatur Site has 13 boilers/process heaters that are subject to the Boiler/Process Heater MACT regulations (40 CFR Part 63 Subpart DDDDD). These 13 sources are subject to the work practice standards due to the fuels they combust, which will require periodic boiler/process heater tune-ups to evaluate combustion efficiency. In addition to the periodic tune-ups, the Site’s two boilers will go through a one-time energy assessment that will include listing potential cost-effective energy conservation measures.

**Issue: BioDiversity – WEEC & Corporate Land for Learnings (CLL) Program**

The BP-Decatur plant joined forces with the Decatur Alabama city school system to develop and construct an environmental learning center in 2000. Our primary purpose was to find a way to express BP's concern for the natural habitat that surrounds the plant as well as our concern for the education of children in the area. The Plant's primary goal was to improve our wildlife habitat and providing place-based education opportunities for local students. The center utilizes best education practices to accomplish this goal. Since opening its doors in 2002, Wetlands Edge Environmental Learning Center (WEEC) has educated thousands of students, teachers and visitors. WEEC provides hands-on, environmental "place-based" educational opportunities across the K-16 curriculum to all who visit. Located on BP's 320+ acres of wildlife habitat, WEEC offers a brand new opportunity to explore the natural world in a setting that combines native species and natural beauty. This award winning wildlife habitat is certified through the Wildlife Habitat Council (WHC), a nonprofit, non-lobbying organization dedicated to increasing the quality and amount of wildlife habitat on corporate, private and public lands. The center offers programs in two classrooms/labs with numerous live displays, including two floor-touch tanks, a 1650-gallon marine tank, and a 780-gallon freshwater ecosystem. In addition, more than two miles of trails traverse the habitat enabling visitors to see several diverse ecosystems including a swamp, a marsh, a pond, bottomland hardwoods, upland species, young pines, and an old oak grove climax community. Such remarkable biodiversity in habitat and species places Alabama in the top five for the contiguous 48 states on the biodiversity index. These programs have earned BP-Decatur certification from the WHC for both “Wildlife at Work” and “Corporate Lands for Learning”. BP-Decatur also is a listed site on Alabama’s Birding Trail.

**Impact**

Through WEEC and Corporate Lands for Learning (CLL) programs, Decatur
demonstrates its outreach to the community and stakeholders as good stewards of the environment

Management

Operational controls:

The management and upkeep of the Decatur CLL process is managed in two distinctly different ways. The curriculum of the WEEC is managed by the Decatur City School System with input from BP Decatur. A Grant from BP to the School system for $30,000.00 per year helps maintain consumable portions of the curriculum. In addition special grants are available throughout the year. Periodic meetings are held with the Decatur City educators and BP to ensure that the two organizations are aligned in strategy and philosophy. Any organizations or groups from outside the Decatur City School that are visitors to the center or the wildlife habitat for educational purposes are coordinated by both groups (BP and The Decatur City School System).

The management and upkeep of the surrounding wildlife habitat that is used for curriculum purposes in the CLL is the responsibility of the BP Decatur site. Some work is managed by volunteers, some by BP Decatur employees and some is contracted by BP Decatur.

Objectives:

• To create an understanding of the natural environment and the interrelationships among living things
  
• To promote sound stewardship and wise management of our natural resources for the welfare of man and all living things
  
• To create an awareness of global, national, and local environmental problems and foster sound decision making regarding their solutions

• To enrich, vitalize, extend, complement and culminate all content areas of the K-12 school curriculum by means of firsthand observation and direct experience outside the classroom

• To develop programs which are constructivist, meeting students where they are, inquiry based, and directly correlated to the National Science Standards, Decatur City Schools Hands-on Activities Science Program (HASP), the Alabama Course of Study and High School Graduation Exam requirements
• To emphasize the concept of biodiversity, a global issue with far-reaching implications that encompasses sustainable development, corporate and social environmental accountability and relationships with local and indigenous communities

Future Plans

• Continue to support the Wetlands Edge Environmental Learning Center annually through monetary donations and various maintenance activities.

• Maintain certification from the Wildlife Habitat Council for both “Wildlife at Work” and “Corporate Lands for Learning”.
Verification

“We have independently reviewed the Decatur Site Environmental Statement and conclude it represents a true and fair reflection of HSSE programs and performance within the 2012 reporting year. We have found no statements in this report which we have been unable to substantiate and verify through observations, visits and review of the appropriate systems.”

Signed: [Signature]  Date: May 17, 2013

(Verification statement by NSF-ISR, Inc., third party independent auditor.)

Glossary

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
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<tbody>
<tr>
<td>BACA</td>
<td>By-Product Aromatic Carboxylic Acid</td>
</tr>
<tr>
<td>CBT</td>
<td>Computer-Based Training</td>
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<tr>
<td>CCL</td>
<td>Corporate Lands for Learning</td>
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<tr>
<td>EEAA</td>
<td>Environmental Education Association of Alabama</td>
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<tr>
<td>EMS</td>
<td>Environmental Management System</td>
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<tr>
<td>GHG</td>
<td>Green House Gas</td>
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<tr>
<td>GHSER</td>
<td>Getting Health, Safety, Environmental Right</td>
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<tr>
<td>GR</td>
<td>Government Reportable Event</td>
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<tr>
<td>HAZOP</td>
<td>Hazard &amp; Operability Review</td>
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<tr>
<td>HSSE</td>
<td>Health, Safety, Security &amp; Environmental</td>
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<tr>
<td>KPI</td>
<td>Key Performance Indicator</td>
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<tr>
<td>LDAR</td>
<td>Leak Detection &amp; Repair</td>
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<tr>
<td>LOMS</td>
<td>Local Operating Management System</td>
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<tr>
<td>LOPA</td>
<td>Layers of Protection Analysis</td>
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<tr>
<td>LQG</td>
<td>Large Quantity Waste Generator</td>
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<tr>
<td>MOC</td>
<td>Memorandum of Change</td>
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<tr>
<td>NDC</td>
<td>Dimethyl 2,6 Naphthalene DiCarboxylate</td>
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<tr>
<td>NIMS</td>
<td>National Incident Management System</td>
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<tr>
<td>OSHA</td>
<td>Occupational Safety Health Administration</td>
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<tr>
<td>PSM</td>
<td>Process Safety Management</td>
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<tr>
<td>Acronym</td>
<td>Description</td>
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<tr>
<td>PTA</td>
<td>Purified Terephthalic Acid</td>
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<tr>
<td>PX</td>
<td>Para-Xylene</td>
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<tr>
<td>RICE</td>
<td>Reciprocating Internal Combustion Engine</td>
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<tr>
<td>S&amp;OR</td>
<td>Safety &amp; Operational Risk</td>
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<tr>
<td>SQG</td>
<td>Small Quantity Waste Generator</td>
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<tr>
<td>TWIC</td>
<td>Transportation Worker Identification Credential</td>
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<tr>
<td>VOC</td>
<td>Volatile Organic Carbon</td>
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<tr>
<td>WEEC</td>
<td>Wetlands Edge Environmental Center</td>
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<tr>
<td>WHC</td>
<td>Wildlife Habitat Council</td>
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