

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 6
DALLAS, TEXAS

FILED
2015 APR -6 PM 11:52
OFFICE OF THE REGIONAL ADMINISTRATOR
DALLAS, TEXAS

IN THE MATTER OF:)
)
)
ENTERPRISE PRODUCTS OPERATING,) DOCKET NO. CAA-06-2015-3316
L.L.C.)
)
RESPONDENT)
_____)

ADMINISTRATIVE ORDER ON CONSENT

The Director of the Compliance Assurance and Enforcement Division of the United States Environmental Protection Agency, Region 6 (EPA) and Enterprise Products Operating, L.L.C. (Respondent) in the above-referenced proceeding, hereby enter into this Administrative Order on Consent (Order).

I. INTRODUCTION AND JURISDICTION

1. This Order is issued by EPA pursuant to Section 113(a)(3) and (4) of the Clean Air Act (CAA), 42 U.S.C. § 7413(a)(3) and (4), which authorizes EPA issue compliance orders for violations of the CAA, including violations of Section 112(r) of the CAA, 42 U.S.C. § 7412(r), and the regulations promulgated at 40 C.F.R. Part 68. The Director, Compliance Assurance and Enforcement Division, EPA Region 6, is the person to whom the authority has been delegated to issue compliance orders in the States of Arkansas, Louisiana, Oklahoma, New Mexico, and Texas.

2. This Order is issued for the Respondent's failure to comply with the Chemical Accident Prevention Provisions of 40 C.F.R. Part 68 regarding the Respondent's facility located at 10207 FM 1942, Mont Belvieu, Texas, 77580.

3. This Order is entered into upon mutual agreement of the parties. Accordingly, the Respondent agrees to undertake all actions required by it by the terms and conditions of this Order. The Respondent consents to and agrees not to contest the authority or jurisdiction of EPA to issue or enforce this Order, and also agrees not to contest the validity or terms of this Order in any action to enforce its provisions.

4. This Order shall apply to and be binding upon the Respondent, its officers, directors, servants, employees, agents, successors and assigns. No change in ownership or corporate or partnership status of the Respondent will in any way alter the status of the Respondent or its responsibilities under this Order.

II. FINDINGS OF FACT AND CONCLUSIONS OF LAW

A. PRELIMINARY ALLEGATIONS

5. Enterprise Products Operating, L.L.C. (Respondent) is a limited liability company authorized to do business in the State of Texas.

6. "Person" is defined in Section 302(e) of the CAA, 42 U.S.C. § 7602(e), as "an individual, corporation, partnership, association, State, municipality, political subdivision of a State, and any agency of the United States and any officer, agent, or employee thereof."

7. The Respondent is a "person" as defined by Section 302(e) of the CAA, 42 U.S.C. § 7602(e).

8. The Respondent operates a facility that processes liquid petroleum gases to produce petroleum products and certain synthetic organic chemicals located at 10207 FM 1942, Mont Belvieu, Texas 77580. This facility includes property that the Respondent identifies as the North Plant and South Plant.

9. "Stationary source" is defined by Section 112(r)(2)(C) of the CAA, 42 U.S.C.

§ 7412(r)(2)(C), and 40 C.F.R. § 68.3 as meaning:

any buildings, structures, equipment, installations or substance emitting stationary activities which belong to the same industrial group, which are located on one or more contiguous properties, which are under the control of the same person (or persons under common control), and from which an accidental release may occur.

10. The Respondent's facility identified in Paragraph 8 is a "stationary source" as that term is defined by Section 112(r)(2)(C) of the CAA, 42 U.S.C. § 7412(r)(2)(C), and 40 C.F.R. § 68.3.

11. The Respondent is the owner and/or operator of the stationary source identified in Paragraph 8.

12. Ammonia (concentration 20% or greater), butane, butene, 1,3-butadiene, 2-butene-cis, chlorine, ethane, hydrogen, isobutane, isopentane, methane, pentane, propane, propylene, and 2,2-dimethylpropane, are "regulated substances", as set forth in 40 C.F.R. § 68.130.

13. "Process" is defined in 40 C.F.R. § 68.3 as meaning

any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances, or combination of activities. For the purpose of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

14. The Respondent has the following processes at the stationary source identified in Paragraph 8:

- A. Propane/Propylene Splitter Process;
- B. Iso-Octane/Methyl Tertiary Ether (MTBE) Process;
- C. Deisobutanizer Process;
- D. Butane Isomerization Process;
- E. Fractionation Process; and
- F. Product Storage and Treating Process.

15. The Respondent has exceeded the threshold quantity for one or more of the regulated substances listed in Paragraph 12 in each of the following processes:

- A. Propane/Propylene Splitter Process;
- B. Iso-Octane/Methyl Tertiary Ether (MTBE) Process;
- C. Deisobutanizer Process;
- D. Butane Isomerization Process;
- E. Fractionation Process; and
- F. Product Storage and Treating Process.

16. "Covered process" is defined in 40 C.F.R. § 68.3 as meaning "a process that has a regulated substance present in more than a threshold quantity as determined under § 68.115."

17. Each of the processes identified in Paragraphs 14 and 15 is "covered process" as that term is defined by 40 C.F.R. § 68.3.

18. Each of the covered processes identified in Paragraphs 14, 15, and 17 is subject to the "Program 3" requirements of the RMP regulations and must, among other things, comply with the Program 3 Prevention Program of 40 C.F.R. Part 68, Subpart D.

19. On or about February 14 – 18 and February 21 – 24, 2011, EPA inspectors conducted an inspection of the Respondent's facility.

20. On or about January 31, 2012, EPA sent an Information Request (Information Request) to the Respondent pursuant to Section 114 of the CAA, 42 U.S.C. § 7414.

21. On or about June 18, 2012, the Respondent submitted its Response to the Information Request.

B. VIOLATION – FAILURE TO TIMELY INSPECT AND/OR TEST CERTAIN PROCESS EQUIPMENT

22. 40 C.F.R. § 68.73(a) provides that the requirements of 40 C.F.R. § 68.73(d) applies to the following process equipment:

- A. Pressure vessels and storage tanks;
- B. Piping systems (including piping components and valves);

- C. Relief and vent systems and devices;
- D. Emergency shutdown systems;
- E. Controls (including monitoring devices and sensors, alarms, and interlocks); and
- F. Pumps.

23. 40 C.F.R. § 68.73(d)(1) - (3) provides that inspections and tests shall be performed on process equipment. Inspection and testing procedures shall follow recognized and generally accepted good engineering practices. The frequency of inspections and tests of process equipment shall be consistent with applicable manufacturers' recommendations and good engineering practices, and more frequently if determined to be necessary by prior operating experience.

24. As of the date of the February 14 – 18 and February 21 – 24, 2011, EPA inspection, the Respondent failed to timely conduct inspections and/or testing of certain process equipment at certain “covered processes” (as defined by 40 C.F.R. § 68.3) identified in Paragraphs 14 – 15.

25. Therefore, the Respondent violated 40 C.F.R. § 68.73(d) by failing to timely conduct inspections and/or testing of certain process equipment at covered processes.

III. ORDER

26. Based on the foregoing Findings of Fact and Conclusions of Law, and other information available to EPA, it is hereby **Ordered and Agreed** that the Respondent shall comply with the requirements set forth below:

A. Within ninety (90) days of the effective date of this Order, the Respondent shall submit to the Texas Commission on Environmental Quality (TCEQ), with a copy to EPA, an application for a Title V Revision [Application] in accordance with 30 T.A.C. §§ 122.132, 122.210, 122.220, and 122.221 [40 C.F.R. §§ 70.5 and 70.7(e)(4)]. The purpose of the Application is to incorporate a Compliance Schedule into the Respondent's Title V Permit,

requiring the Respondent to conduct overdue mechanical integrity inspections for the Units listed below according to a schedule set forth in the Application:

- 800 Butamer;
- Butamer Common;
- Carbon Dioxide Removal;
- Caustic Handling Area;
- Cogeneration II;
- Common Hydrogen System;
- CSP Unit;
- Defluorinator Units;
- Dehydration/Refrigeration Unit;
- 300 Deisobutanizer Unit;
- 400 Deisobutanizer Unit;
- 600 Deisobutanizer Unit;
- 900 Deisobutanizer Unit;
- 1200 Deisobutanizer Unit;
- 1300 Deisobutanizer Unit;
- Dixie Dehydrator Unit;
- East Storage;
- East Storage Dehydrator Unit;
- High Purity Isobutane Dryers;
- High Purity Isobutane Unit;
- Isobutane Cooling Tower;
- 100 Isomerization Unit;
- 200 Isomerization Unit;
- Merox Unit;
- Mantell P-L/Arsine Unit;
- MTBE Ethermax Unit;
- MTBE Oleflex;
- MTBE Regenerant Tower;
- MTBE Utilities;
- North Storage;
- Pentane Stripper;
- Propane/Propene Splitter I;
- Propane/Propene Splitter II;
- Propane/Propene Splitter IV;
- Seminole Fractionator;
- South Plant Flare System;
- Splitter III Unit 1;
- Splitter III Unit 2;
- Splitter III Unit 3;
- Sulfur Removal Tower;
- West Texas Fractionator;
- West Terminal;

- West Texas Deisobutanizer;
- West Texas Storage; and
- 700 Towers.

B. For the Units set forth above, the Respondent shall identify (or otherwise reference) in the Application to TCEQ overdue mechanical inspections, separated into three lists, Overdue Internal Mechanical Integrity Inspections (Exhibit 1), Overdue External Mechanical Integrity Inspections (Exhibit 2), and Overdue External Mechanical Integrity Inspections Requiring Additional Time (Exhibit 3). The Respondent shall also include such additional information in the Application as the TCEQ may direct. The Respondent shall request in the Application to TCEQ a Compliance Schedule in accordance with the provisions set forth in Paragraphs 26.C through 26.G. below.

C. The Compliance Schedule shall require the Respondent to complete the inspections by the following dates:

1. Internal Mechanical Integrity Inspections (Exhibit 1)
 - a. A minimum of 105 inspections by December 31, 2015;
 - b. A minimum of 158 inspections by December 31, 2016;
 - c. A minimum of 210 inspections by December 31, 2017; and
 - d. 263 internal inspections by December 31, 2018.
2. External Mechanical Integrity Inspections

The Respondent shall complete all external mechanical inspections set forth in Exhibit 2 by December 31, 2015.

3. External Mechanical Integrity Inspections Requiring Additional Time

Exhibit 3 consists of external inspections that are not able to be conducted while the Units on which the external inspections will be conducted are online for reasons such as high

temperature limitations or for inspection points that are difficult to reach. For any Unit with external inspections identified on Exhibit 3, Respondent shall conduct the external inspections identified on Exhibit 3 for that Unit during the time that the Unit is shutdown or taken offline in order to conduct internal inspections on the Unit in accordance with the schedule set forth in Paragraph 26.C. Accordingly, all external mechanical integrity inspections set forth on Exhibit 3 shall be completed no later than December 31, 2018.

D. Inspections completed on or after January 1, 2014 shall count for purposes of determining whether the minimum inspection requirements in this Paragraph 26.C have been met.

E. Inspections for a Unit shall be considered completed upon removal of all 40 C.F.R. § 68.130 regulated substances from the Unit, provided that the inspection and testing procedures specified in Paragraph 26.G are satisfied prior to reintroducing regulated substances into the Unit. This condition shall be included in the Compliance Schedule. For the Compliance Schedule to be terminated and removed from Respondent's Title V Permit, all required inspection and testing procedures specified in Paragraph 26.G must be satisfied for the inspections identified on Exhibit Nos. 1, 2, and 3 or, for any inspections identified on Exhibit Nos. 1, 2, and 3 on a Unit from which all 40 C.F.R. § 68.130 substances have been removed, the Respondent must certify to TCEQ that it does not intend to reintroduce 40 C.F.R. § 68.130 regulated substances into the Unit.

F. If the Respondent claims that inspections have been completed pursuant to Paragraph 26.E of this AOC, the Compliance Schedule shall require the Respondent to submit the following information to TCEQ. This information shall be considered a monitoring report and is required to be reported to TCEQ pursuant to 30 T.A.C. § 122.145(1):

- a. Name of unit;
- b. Date unit taken out of service;
- c. Reason unit taken out of service;
- d. Regulated substances removed from the unit;
- e. Number of inspections deferred;
- f. A detailed explanation of how all regulated substances were removed from the unit;

and

- g. Expected date of unit startup (if known).

G. The Compliance Schedule shall require that all inspections and testing procedures be conducted in accordance with applicable manufacturers recommendations and recognized and generally acceptable good engineering practices, as required by 40 C.F.R. § 68.73.

H. Nothing in this AOC shall limit EPA's rights under applicable environmental laws or regulations, including, but not limited to, Section 505 of the CAA, 42 U.S.C. § 7661d, and 40 C.F.R. § 70.8 to object to the permit revision.

I. Unless otherwise specifically provided elsewhere in this Order, whenever notice is required to be given, whenever a report or other document is required to be forwarded by one party to another, or whenever a submission or demonstration is required to be made, it shall be directed to the individuals specified below at the addresses given (in addition to any action specified by statute or regulation), unless these individuals or their successors give notice in writing to the other party that another individual has been designated to receive the communication:

EPA:

Chief, Surveillance Section (6EN-AS)
Air Enforcement Branch
U.S. EPA, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733
Attention: Marie Stucky

Respondent:

Graham Bacon
Group Senior Vice President, Operations and EHS & T
Enterprise Products Partners
1100 Louisiana Street
Houston, TX 77002

Eddie Lewis
Norton Rose Fulbright
1301 McKinney, Suite 5100
Houston, Texas 77010

IV. GENERAL PROVISIONS

27. The Respondent neither admits nor denies the Findings of Fact and Conclusions of Law set forth in this Order.

28. This Order shall not relieve the Respondent of its obligation to comply with all applicable federal, State, and local laws, regulations and other legal requirements, nor shall it be construed to be a ruling on, or determination of, any issue related to any federal, State or local permit.

29. EPA reserves all of its statutory and regulatory powers, authorities, rights, and remedies, both legal and equitable, which may pertain to the Respondent's failure to comply with any of the requirements of this Order. This Order shall not be construed as a covenant not to sue, release, waiver, or limitation of any rights, remedies, powers, and/or authorities, civil or criminal,

which EPA has under any other statutory, regulatory, or common law authority of the United States.

30. This Order does not resolve any civil or criminal claims of the United States for the violations alleged in this Order, nor does it limit the rights of the United States to obtain penalties or injunctive relief under the CAA or other applicable federal law or regulation.

31. This Order is not intended to be, nor shall it be construed to be, a permit. Further, the Parties acknowledge and agree that EPA's approval of this Order does not constitute a warranty or representation that requirements provided hereunder will meet the requirements of Section 112(r) of the CAA. Compliance by the Respondent with the terms of this Order shall not relieve the Respondent of its obligations to comply with the CAA or any other applicable local, State, or federal laws and regulations.

32. Nothing herein shall limit the power and authority of EPA or the United States to take, direct, or order all actions necessary to protect public health, welfare, or the environment or to prevent, abate, or minimize an actual or threatened release of a regulated substance, extremely hazardous substance, or other substance on, at, or from the Facility. This Order shall not constitute or be construed as a release of any liability that the Respondent or any other person has under the CAA or any other law.

33. Nothing herein shall be construed as an extension of time for complying with any statutory or regulatory requirement under the CAA or any other law.

34. The Respondent waives any and all remedies, claims for relief and otherwise available rights to judicial or administrative review that the Respondent may have with respect to any issue of fact or law set forth in this Order, including any right of judicial review under Section 307(b)(1) of the CAA, 42 U.S.C. § 7607(b)(1).

35. In any subsequent administrative or judicial proceeding initiated by EPA or the United States for injunctive or other appropriate relief relating to the Facility, the Respondent shall not assert, and may not maintain, any defense or claim based upon the principles of waiver, res judicata, collateral estoppels, issue preclusion, claim-splitting, or other defenses based upon any contention that the claims raised by EPA or the United States in the subsequent proceeding were or should have been raised in the present matter.

36. Neither EPA nor the United States, by issuance of this Order, assumes any liability for any acts or omissions by Respondent or its employees, agents, contractors, or consultants engaged to carry out any action or activity pursuant to this Order. Nor shall EPA or the United States be held as a party to any contract entered into by Respondent or by its employees, agents, contractors, or consultants.

37. The Parties shall bear their own costs and fees in this action, including attorney fees.

38. Each undersigned representative of the parties to this Order certifies that he or she is fully authorized by the party represented to enter into the terms and conditions of this Order and to execute and legally bind that party to it.

39. This Order shall terminate upon EPA's notice to the Respondent that it has received a copy of the Respondent's Application for a Title V Revision, as set forth in Paragraph 26.A of this Order.

40. Pursuant to Section 113(a)(4) of the CAA, 42 U.S.C. § 7413(a)(4), an Order does not take effect until the person to whom it has been issued has had an opportunity to confer with the EPA concerning the alleged violations. By signing this Order, the Respondent acknowledges and agrees that it has been provided an opportunity to confer with the EPA prior to issuance of this Order. Accordingly, the effective date of this Order shall be the date of signature by EPA.

**THE UNDERSIGNED PARTIES CONSENT TO THE ENTRY OF THIS
ADMINISTRATIVE ORDER ON CONSENT**

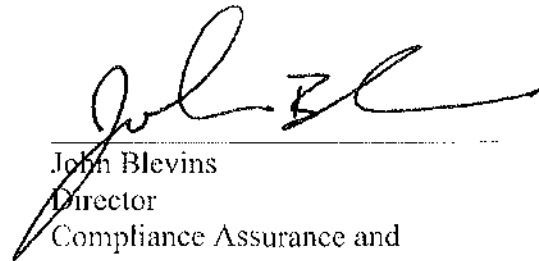
FOR THE RESPONDENT:

Date: 3/27/2015


Enterprise Products Operating, L.L.C.
Graham W. Bacon

FOR EPA:

Date: 4.6.15



John Blevins
Director
Compliance Assurance and
Enforcement Division

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of April, 2015, the original and one copy of the foregoing Administrative Order on Consent was hand delivered to the Regional Hearing Clerk, U.S. EPA - Region 6, 1445 Ross Avenue, Dallas, Texas 75202-2733, and that a true and correct copy of the Administrative Order on Consent was sent to the following by the method indicated below:

Certified mail, return receipt requested 7007 3020 0002 5102 1837:

Eddie Lewis
Norton Rose Fulbright
Fulbright & Jaworski, L.L.P.
Fulbright Tower
1301 McKinney
Suite 5100
Houston, Texas 77010-3095

Certified mail, return receipt requested 7007 3020 0002 5102 1851:

Graham Bacon
Group Senior Vice President, Operations and EHS & T
Enterprise Products Partners
1100 Louisiana Street
Houston, TX 77002

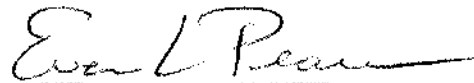


EXHIBIT 1 - INTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
1	100 ISOM	040HT16119	Shell and Tube Exchanger
2	100 ISOM	040HT16108	Shell and Tube Exchanger
3	100 ISOM	040HT16201	Air Cooled Exchanger
4	100 ISOM	040HT16105	Shell and Tube Exchanger
5	100 ISOM	040HT16220	Shell and Tube Exchanger
6	100 ISOM	040HT16120	Shell and Tube Exchanger
7	100 ISOM	040PV17125	Pressure Vessel
8	100 ISOM	040PV17125	Pressure Vessel
9	100 ISOM	040PV17127	Pressure Vessel
10	100 ISOM	040PV17127	Pressure Vessel
11	100 ISOM	040PV17128	Pressure Vessel
12	100 ISOM	040PV17128	Pressure Vessel
13	100 ISOM	040PV17129	Pressure Vessel
14	100 ISOM	040PV17129	Pressure Vessel
15	100 ISOM	040PV17106	Pressure Vessel
16	100 ISOM	040PV17224	Pressure Vessel
17	100 ISOM	040PV17224	Pressure Vessel
18	100 ISOM	040PV17229	Pressure Vessel
19	100 ISOM	040PV17229	Pressure Vessel
20	100 ISOM	040PV17227	Pressure Vessel
21	100 ISOM	040PV17227	Pressure Vessel
22	100 ISOM	040PV17228	Pressure Vessel
23	100 ISOM	040PV17228	Pressure Vessel
24	100 ISOM	040PV17006	Pressure Vessel
25	100 ISOM	040PV17225	Pressure Vessel
26	100 ISOM	040PV17225	Pressure Vessel
27	100 ISOM	040HT16110-2	Air Cooled Exchanger
28	100 ISOM	040HT16110-1	Air Cooled Exchanger
29	100 ISOM	040HT16001	Shell and Tube Exchanger
30	100 ISOM	040HT16002	Air Cooled Exchanger
31	100 ISOM	040HT16003	Air Cooled Exchanger
32	100 ISOM	040HT16003	Air Cooled Exchanger
33	100 ISOM	040HT16002	Air Cooled Exchanger
34	100 ISOM	040PV17001	Pressure Vessel
35	100 ISOM	040HT16107	Air Cooled Exchanger
36	100 ISOM	040HT16110-2	Air Cooled Exchanger

EXHIBIT 1 - INTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
37	100 ISOM	040HT16110-1	Air Cooled Exchanger
38	100 ISOM	040HT16206A	Shell and Tube Exchanger
39	100 ISOM	040HT16205	Shell and Tube Exchanger
40	100 ISOM	040HT16124	Air Cooled Exchanger
41	100 ISOM	040PV17101	Pressure Vessel
42	100 ISOM	040PV17101	Pressure Vessel
43	100 ISOM	040HT16001	Shell and Tube Exchanger
44	100 ISOM	040HT16111	Shell and Tube Exchanger
45	1200 DIB	112HT16002	Shell and Tube Exchanger
46	200 ISOM	036HT16004	Shell and Tube Exchanger
47	200 ISOM	036PV17202B	Pressure Vessel
48	300 DIB	038HT16003B	Air Cooled Exchanger
49	300 DIB	038HT16008	Air Cooled Exchanger
50	300 DIB	038HT16003D	Air Cooled Exchanger
51	300 DIB	038HT16003A	Air Cooled Exchanger
52	300 DIB	038HT16003C	Air Cooled Exchanger
53	300 DIB	038HT16003B	Air Cooled Exchanger
54	300 DIB	038HT16008	Air Cooled Exchanger
55	300 DIB	038HT16003D	Air Cooled Exchanger
56	300 DIB	038HT16003A	Air Cooled Exchanger
57	300 DIB	038HT16003C	Air Cooled Exchanger
58	300 DIB	038HT16016	Shell and Tube Exchanger
59	300 DIB	038HT16015	Shell and Tube Exchanger
60	700 Towers	052HT16605B	Air Cooled Exchanger
61	700 Towers	052HT16605D	Air Cooled Exchanger
62	700 Towers	052HT16610	Air Cooled Exchanger
63	700 Towers	052HT16605A	Air Cooled Exchanger
64	700 Towers	052HT16605C	Air Cooled Exchanger
65	700 Towers	052HT16609	Air Cooled Exchanger
66	700 Towers	052HT16605B	Air Cooled Exchanger
67	700 Towers	052HT16605D	Air Cooled Exchanger
68	700 Towers	052HT16609	Air Cooled Exchanger
69	700 Towers	052HT16610	Air Cooled Exchanger
70	700 Towers	052HT16605A	Air Cooled Exchanger
71	700 Towers	052HT16605C	Air Cooled Exchanger
72	700 Towers	052HT16003	Air Cooled Exchanger

EXHIBIT 1 - INTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
73	700 Towers	052HT16003	Air Cooled Exchanger
74	700 Towers	052HT16004	Air Cooled Exchanger
75	700 Towers	052HT16004	Air Cooled Exchanger
76	800 Butamer	048PV17019	Pressure Vessel
77	800 Butamer	048PV17017	Pressure Vessel
78	800 Butamer	048PV17010	Pressure Vessel
79	900 DIB	053HT16002B	Shell and Tube Exchanger
80	Butamer Common	050HT16069A	Air Cooled Exchanger
81	Butamer Common	050HT16069B	Air Cooled Exchanger
82	Butamer Common	050PV17001	Pressure Vessel
83	Butamer Common	050PV17509	Pressure Vessel
84	Butamer Common	050PV17509	Pressure Vessel
85	Butamer Common	050PV17001	Pressure Vessel
86	Butamer Common	050PV17115	Pressure Vessel
87	Caustic Handling Area	123SV19060	Storage Tank
88	Caustic Handling Area	123SV19060	Storage Tank
89	Caustic Handling Area	123PV17066	Pressure Vessel
90	Caustic Handling Area	123SV19056	Storage Tank
91	Caustic Handling Area	123SV19056	Storage Tank
92	Caustic Handling Area	123SV19061	Storage Tank
93	Caustic Handling Area	123SV19061	Storage Tank
94	Common Hydrogen System	122PV17131	Pressure Vessel
95	Common Hydrogen System	122PV17501A	Pressure Vessel
96	Common Hydrogen System	122PV17501A	Pressure Vessel
97	Common Hydrogen System	122PV17501B	Pressure Vessel
98	Common Hydrogen System	122PV17501B	Pressure Vessel
99	CSP Unit	014HT16002	Shell and Tube Exchanger
100	Defluorinator	120PV17002	Pressure Vessel
101	Dehydration-Refrigeration	143FL20022	Pressure Vessel
102	Dixie Dehydrator	068PV17803	Pressure Vessel
103	Dixie Dehydrator	068PV17804	Pressure Vessel
104	Dixie Dehydrator	068PV17802	Pressure Vessel
105	Dixie Dehydrator	068PV17805	Pressure Vessel
106	Dixie Dehydrator	068FL20801	Pressure Vessel
107	Dixie Dehydrator	068HT16801C	Air Cooled Exchanger
108	Dixie Dehydrator	068HT16801B	Air Cooled Exchanger

EXHIBIT 1 - INTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
109	E. Stor Dehydrator	063EFL20017	Pressure Vessel
110	E. Stor Dehydrator	063EFL20012	Pressure Vessel
111	High Purity Isobutane	110FL20003	Pressure Vessel
112	High Purity Isobutane	110FL20004	Pressure Vessel
113	High Purity Isobutane	110FL20002	Pressure Vessel
114	Isobutane Cooling Tower	044HT16002	Air Cooled Exchanger
115	Isobutane Cooling Tower	044HT16002	Air Cooled Exchanger
116	Isobutane Cooling Tower	044HT16004	Air Cooled Exchanger
117	Isobutane Cooling Tower	044HT16004	Air Cooled Exchanger
118	Merox	030PV17001	Pressure Vessel
119	Merox	030PV17001	Pressure Vessel
120	Merox	030HT16001	Shell and Tube Exchanger
121	Merox	030PV17003	Pressure Vessel
122	Merox	030PV17004	Pressure Vessel
123	Merox	030PV17004	Pressure Vessel
124	Montell P-L/Arsine Trtr	089PV17003	Pressure Vessel
125	MTBE Ethermax	102HT16402	Shell and Tube Exchanger
126	MTBE Ethermax	102HT16401	Shell and Tube Exchanger
127	MTBE Ethermax	102HT16217	Shell and Tube Exchanger
128	MTBE Ethermax	102HT16213	Shell and Tube Exchanger
129	MTBE Utilities	107SV19804	Storage Tank
130	North Storage	061PV17002	Pressure Vessel
131	North Storage	061PV17001	Pressure Vessel
132	P/P Splitter I	078HT16001	Air Cooled Exchanger
133	P/P Splitter I	078HT16027	Shell and Tube Exchanger
134	P/P Splitter I	078HT16010	Shell and Tube Exchanger
135	P/P Splitter I	078HT16019B	Air Cooled Exchanger
136	P/P Splitter I	078HT16025	Shell and Tube Exchanger
137	P/P Splitter I	078HT16807A	Air Cooled Exchanger
138	P/P Splitter I	078HT16807B	Air Cooled Exchanger
139	P/P Splitter I	078HT16807C	Air Cooled Exchanger
140	P/P Splitter I	078HT16006	Air Cooled Exchanger
141	P/P Splitter I	078PV17023	Pressure Vessel
142	P/P Splitter I	078PV17021	Pressure Vessel
143	P/P Splitter I	078PV17010	Pressure Vessel
144	P/P Splitter I	078PV17013	Pressure Vessel

EXHIBIT 1 - INTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
145	P/P Splitter I	078PV17007	Pressure Vessel
146	P/P Splitter I	078PV17001	Pressure Vessel
147	P/P Splitter I	078PV17001	Pressure Vessel
148	P/P Splitter I	078FL20003	Pressure Vessel
149	P/P Splitter I	078FL20007	Pressure Vessel
150	P/P Splitter I	078PV17003	Pressure Vessel
151	P/P Splitter I	078HT16025	Shell and Tube Exchanger
152	P/P Splitter I	078HT16027	Shell and Tube Exchanger
153	P/P Splitter I	078PV17009	Column
154	P/P Splitter I	078PV17008	Column
155	P/P Splitter I	078PV17014	Column
156	P/P Splitter I	078HT16014A/B	Shell and Tube Exchanger
157	P/P Splitter I	078HT16007B	Air Cooled Exchanger
158	P/P Splitter I	078HT16019C	Air Cooled Exchanger
159	P/P Splitter I	078HT16019A	Air Cooled Exchanger
160	P/P Splitter I	078HT16007A	Air Cooled Exchanger
161	P/P Splitter I	078SV19015	Storage Tank
162	P/P Splitter I	078SV19013	Storage Tank
163	P/P Splitter I	078PV17808	Column
164	P/P Splitter I	078HT16020	Air Cooled Exchanger
165	P/P Splitter I	078HT16021	Air Cooled Exchanger
166	P/P Splitter I	078HT16013A	Air Cooled Exchanger
167	P/P Splitter I	078HT16013B	Air Cooled Exchanger
168	P/P Splitter I	078PV17004	Column
169	P/P Splitter I	078PV17012	Column
170	P/P Splitter I	078HT16009	Shell and Tube Exchanger
171	P/P Splitter I	078PV17020	Pressure Vessel
172	P/P Splitter I	078PV17019	Pressure Vessel
173	P/P Splitter II	055HT16011B	Shell and Tube Exchanger
174	P/P Splitter II	055HT16025	Pipe
175	P/P Splitter II	055HT16018	Shell and Tube Exchanger
176	P/P Splitter II	055HT16007	Shell and Tube Exchanger
177	P/P Splitter II	055HT16011A	Shell and Tube Exchanger
178	P/P Splitter II	055HT16009	Shell and Tube Exchanger
179	P/P Splitter II	055HT16018	Shell and Tube Exchanger
180	P/P Splitter II	055HT16011A	Shell and Tube Exchanger

EXHIBIT 1 - INTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
181	P/P Splitter II	055PV17001	Column
182	P/P Splitter II	055SV19007	Pressure Vessel
183	P/P Splitter II	055HT16011B	Shell and Tube Exchanger
184	P/P Splitter II	055HT16021	Air Cooled Exchanger
185	P/P Splitter II	055HT16017	Air Cooled Exchanger
186	P/P Splitter II	055HT16016	Shell and Tube Exchanger
187	P/P Splitter II	055HT16004	Shell and Tube Exchanger
188	P/P Splitter II	055HT16020	Shell and Tube Exchanger
189	Pentane Stripper	046HT16901A	Air Cooled Exchanger
190	Pentane Stripper	046HT16901D	Air Cooled Exchanger
191	Pentane Stripper	046HT16901D	Air Cooled Exchanger
192	Pentane Stripper	046HT16901A	Air Cooled Exchanger
193	Pentane Stripper	046HT16901B	Air Cooled Exchanger
194	Pentane Stripper	046HT16906	Air Cooled Exchanger
195	Pentane Stripper	046HT16906	Air Cooled Exchanger
196	Pentane Stripper	046HT16905	Air Cooled Exchanger
197	Pentane Stripper	046HT16905	Air Cooled Exchanger
198	Pentane Stripper	046HT16901B	Air Cooled Exchanger
199	Pentane Stripper	046HT16901C	Air Cooled Exchanger
200	Pentane Stripper	046HT16901C	Air Cooled Exchanger
201	Seminole Fractionator	042HT16631A	Shell and Tube Exchanger
202	Seminole Fractionator	042HT16631B	Shell and Tube Exchanger
203	Seminole Fractionator	042HT16632	Air Cooled Exchanger
204	Seminole Fractionator	042HT16633	Shell and Tube Exchanger
205	Seminole Fractionator	042HT16602	Shell and Tube Exchanger
206	Seminole Fractionator	042PV17636	Pressure Vessel
207	Seminole Fractionator	042HT16619	Shell and Tube Exchanger
208	Seminole Fractionator	042HT16624	Shell and Tube Exchanger
209	Seminole Fractionator	042HT16112	Air Cooled Exchanger
210	Seminole Fractionator	042PV17620	Pressure Vessel
211	Seminole Fractionator	042PV17619	Column
212	Seminole Fractionator	042PV17631	Column
213	Seminole Fractionator	042PV17601	Column
214	Seminole Fractionator	042HT16618	Shell and Tube Exchanger
215	Seminole Fractionator	042HT16619	Shell and Tube Exchanger
216	South Plant Flare System	359PV17011	Pressure Vessel

EXHIBIT 1 - INTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
217	Splitter III Unit 1	023AHT16007	Shell and Tube Exchanger
218	Splitter III Unit 1	023APV17001	Pressure Vessel
219	Splitter III Unit 1	023APV17035	Pressure Vessel
220	Splitter III Unit 1	023APV17034	Pressure Vessel
221	Splitter III Unit 3	023CHT16012D	Air Cooled Exchanger
222	Splitter III Unit 3	023CPV17006	Pressure Vessel
223	Splitter III Unit 3	023CHT16002	Shell and Tube Exchanger
224	Splitter III Unit 3	023CHT16012D	Air Cooled Exchanger
225	Splitter III Unit 3	023CHT16001	Shell and Tube Exchanger
226	Splitter III Unit 3	023CPV17023	Pressure Vessel
227	Splitter III Unit 3	023CHT16009	Shell and Tube Exchanger
228	Splitter III Unit 3	023CPV17005	Pressure Vessel
229	Splitter III Unit 3	023CSV19003	Storage Tank
230	Splitter III Unit 3	023CSV19004	Storage Tank
231	Splitter III Unit 3	023CSV19001	Storage Tank
232	W. Texas Fractionator	058HT16056A	Air Cooled Exchanger
233	W. Texas Fractionator	058HT16056A	Air Cooled Exchanger
234	W. Texas Fractionator	058HT16061	Air Cooled Exchanger
235	W. Texas Fractionator	058HT16062	Air Cooled Exchanger
236	W. Texas Fractionator	058HT16062	Air Cooled Exchanger
237	W. Texas Fractionator	058HT16006	Shell and Tube Exchanger
238	W. Texas Fractionator	058HT16011	Shell and Tube Exchanger
239	W. Texas Fractionator	058HT16009A	Shell and Tube Exchanger
240	W. Texas Fractionator	058PV17025	Pressure Vessel
241	W. Texas Fractionator	058HT16011	Shell and Tube Exchanger
242	W. Texas Fractionator	058PV17023	Pressure Vessel
243	W. Texas Fractionator	058PV17062	Pressure Vessel
244	W. Texas Fractionator	058PV17012	Pressure Vessel
245	W. Texas Fractionator	058PV17114	Pressure Vessel
246	W. Texas Fractionator	058PV17115	Pressure Vessel
247	W. Texas Fractionator	058PV17008	Pressure Vessel
248	W. Texas Fractionator	058HT16007	Shell and Tube Exchanger
249	West Terminal	062SV19006	Pressure Vessel
250	West Terminal	062HT16001A	Air Cooled Exchanger
251	West Terminal	062HT16002	Air Cooled Exchanger
252	West Terminal	062HT16002A	Air Cooled Exchanger

EXHIBIT 1 - INTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
253	West Terminal	062HT16001	Air Cooled Exchanger
254	West Texas DIB	082HT16009	Air Cooled Exchanger
255	West Texas DIB	082HT16005B	Air Cooled Exchanger
256	West Texas DIB	082FL20001 Sump	Pressure Vessel
257	West Texas DIB	082HT16009	Air Cooled Exchanger
258	West Texas DIB	082HT16005C	Air Cooled Exchanger
259	West Texas DIB	082HT16005C	Air Cooled Exchanger
260	West Texas Storage	084SV19604	Pressure Vessel
261	West Texas Storage	084SV19006	Pressure Vessel
262	West Texas Storage	084SV19602	Pressure Vessel
263	West Texas Storage	084SV19601	Pressure Vessel

EXHIBIT 2 - EXTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
1	100 ISOM	040FL20001	Pressure Vessel
2	100 ISOM	040HT16104A	Shell and Tube Exchanger
3	100 ISOM	040HT16105	Shell and Tube Exchanger
4	100 ISOM	040HT16110-1	Air Cooled Exchanger
5	100 ISOM	040HT16111	Shell and Tube Exchanger
6	100 ISOM	040HT16206A	Shell and Tube Exchanger
7	100 ISOM	040MI35015C	Pipe
8	100 ISOM	040PV17102	Pressure Vessel
9	100 ISOM	040PV17109	Pressure Vessel
10	100 ISOM	040PV17112	Column
11	100 ISOM	040PV17127	Pressure Vessel
12	100 ISOM	040PV17228	Pressure Vessel
13	1200 DIB	112HT16001	Shell and Tube Exchanger
14	1200 DIB	112HT16002	Shell and Tube Exchanger
15	1200 DIB	112PV17001	Column
16	200 ISOM	036FL20214B	Pressure Vessel
17	200 ISOM	036HT16005	Shell and Tube Exchanger
18	200 ISOM	036HT16106B	Shell and Tube Exchanger
19	200 ISOM	036HT16204A	Shell and Tube Exchanger
20	200 ISOM	036HT16204B	Shell and Tube Exchanger
21	200 ISOM	036HT16204C	Shell and Tube Exchanger
22	200 ISOM	036HT16204D	Shell and Tube Exchanger
23	200 ISOM	036HT16207A	Air Cooled Exchanger
24	200 ISOM	036HT16207B	Air Cooled Exchanger
25	200 ISOM	036HT16208	Shell and Tube Exchanger
26	200 ISOM	036HT16212	Shell and Tube Exchanger
27	200 ISOM	036PV17011	Pressure Vessel
28	200 ISOM	036PV17201	Pressure Vessel
29	200 ISOM	036PV17204	Pressure Vessel
30	200 ISOM	036PV17206	Pressure Vessel
31	200 ISOM	036PV17209	Pressure Vessel
32	200 ISOM	036PV17210	Column
33	200 ISOM	036PV17211	Pressure Vessel
34	200 ISOM	036PV17232	Pressure Vessel
35	200 ISOM	036PV17233	Pressure Vessel
36	300 DIB	038HT16003A	Air Cooled Exchanger

EXHIBIT 2 - EXTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
37	300 DIB	038HT16003B	Air Cooled Exchanger
38	300 DIB	038MI35002A	Pipe
39	300 DIB	038PV17001	Column
40	300 DIB	038PV17002	Pressure Vessel
41	300 DIB	038PV17004	Pressure Vessel
42	400 DIB	033FL20004	Pressure Vessel
43	400 DIB	033HT16003G	Air Cooled Exchanger
44	400 DIB	033PV17003	Pressure Vessel
45	400 DIB	033PV17006	Pressure Vessel
46	600 DIB	047PV17001	Column
47	700 Towers	052MI35002G	Pipe
48	700 Towers	052MI35005A	Pipe
49	700 Towers	052PV17604	Pressure Vessel
50	800 Butamer	048HT16001B	Shell and Tube Exchanger
51	800 Butamer	048HT16003A	Shell and Tube Exchanger
52	800 Butamer	048HT16003B	Shell and Tube Exchanger
53	800 Butamer	048HT16006A	Air Cooled Exchanger
54	800 Butamer	048HT16008A	Air Cooled Exchanger
55	800 Butamer	048HT16008B	Air Cooled Exchanger
56	800 Butamer	048HT16008C	Air Cooled Exchanger
57	800 Butamer	048HT16009	Shell and Tube Exchanger
58	800 Butamer	048HT16010	Shell and Tube Exchanger
59	800 Butamer	048HT16012A	Shell and Tube Exchanger
60	800 Butamer	048HT16012B	Shell and Tube Exchanger
61	800 Butamer	048HT16013A	Air Cooled Exchanger
62	800 Butamer	048HT16013B	Air Cooled Exchanger
63	800 Butamer	048HT16014	Shell and Tube Exchanger
64	800 Butamer	048HT16015A	Air Cooled Exchanger
65	800 Butamer	048HT16015B	Air Cooled Exchanger
66	800 Butamer	048MI35001R	Pipe
67	800 Butamer	048PV17002	Pressure Vessel
68	800 Butamer	048PV17007	Column
69	800 Butamer	048PV17008	Column
70	800 Butamer	048PV17012	Pressure Vessel
71	800 Butamer	048PV17013	Pressure Vessel
72	800 Butamer	048PV17014	Pressure Vessel

EXHIBIT 2 - EXTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
73	800 Butamer	048PV17016	Pressure Vessel
74	800 Butamer	048PV17021	Pressure Vessel
75	800 Butamer	048PV17023	Pressure Vessel
76	900 DIB	053HT16002A	Shell and Tube Exchanger
77	900 DIB	053HT16002B	Shell and Tube Exchanger
78	900 DIB	053HT16003A	Air Cooled Exchanger
79	900 DIB	053HT16003B	Air Cooled Exchanger
80	900 DIB	053HT16003C	Air Cooled Exchanger
81	900 DIB	053HT16003D	Air Cooled Exchanger
82	900 DIB	053HT16003E	Air Cooled Exchanger
83	900 DIB	053HT16003F	Air Cooled Exchanger
84	900 DIB	053MI35001K	Pipe
85	900 DIB	053MI35001R	Pipe
86	900 DIB	053MI35005A	Pipe
87	900 DIB	053MI35006A	Pipe
88	900 DIB	053PV17002	Pressure Vessel
89	Butamer Common	050PV17002	Pressure Vessel
90	Butamer Common	050PV17115	Pressure Vessel
91	Butamer Common	050SV19101	Pressure Vessel
92	C5 Stripper	013HT16002A	Air Cooled Exchanger
93	C5 Stripper	013HT16002B	Air Cooled Exchanger
94	C5 Stripper	013HT16002C	Air Cooled Exchanger
95	C5 Stripper	013HT16002D	Air Cooled Exchanger
96	C5 Stripper	013HT16002E	Air Cooled Exchanger
97	C5 Stripper	013HT16002F	Air Cooled Exchanger
98	C5 Stripper	013HT16002G	Air Cooled Exchanger
99	C5 Stripper	013HT16002H	Air Cooled Exchanger
100	C5 Stripper	013HT16004	Air Cooled Exchanger
101	C5 Stripper	013MI35002B	Pipe
102	C5 Stripper	013MI35005E	Pipe
103	C5 Stripper	013MI35007A	Pipe
104	C5 Stripper	013PV17003	Column
105	CO2 Removal	057FL20001	Pressure Vessel
106	CO2 Removal	057HT16703	Shell and Tube Exchanger
107	CO2 Removal	057HT16706	Shell and Tube Exchanger
108	CO2 Removal	057MI35002A	Pipe

EXHIBIT 2 - EXTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
109	CO2 Removal	057MI35011A	Pipe
110	CO2 Removal	057PV17001	Pressure Vessel
111	CO2 Removal	057PV17002	Pressure Vessel
112	CO2 Removal	057PV17003	Pressure Vessel
113	Common Hydrogen System	122HT16001	Air Cooled Exchanger
114	Common Hydrogen System	122HT16500	Air Cooled Exchanger
115	Common Hydrogen System	122PV17131	Pressure Vessel
116	Common Hydrogen System	122PV17501A	Pressure Vessel
117	CSP Unit	014FL20003	Pressure Vessel
118	CSP Unit	014HT16001	Shell and Tube Exchanger
119	CSP Unit	014HT16002	Shell and Tube Exchanger
120	CSP Unit	014PV17001	Pressure Vessel
121	Defluorinator	120HT16001B	Shell and Tube Exchanger
122	Defluorinator	120HT16001D	Shell and Tube Exchanger
123	Defluorinator	120HT16003A	Air Cooled Exchanger
124	Defluorinator	120HT16003B	Air Cooled Exchanger
125	Defluorinator	120MI35001B	Pipe
126	Dixie Dehydrator	068FL20801	Pressure Vessel
127	Dixie Dehydrator	068PV17801	Pressure Vessel
128	Dixie Dehydrator	068PV17806	Pressure Vessel
129	East Storage	063EMI35018A	Pipe
130	East Storage	063EMI35030AA	Pipe
131	East Storage	063EMI35030AC	Pipe
132	East Storage	063EMI35030AD	Pipe
133	East Storage	063EMI35030AE	Pipe
134	East Storage	063EMI35030AF	Pipe
135	East Storage	063EMI35030AG	Pipe
136	East Storage	063EMI35030AH	Pipe
137	East Storage	063EMI35030AJ	Pipe
138	East Storage	063EMI35030AK	Pipe
139	East Storage	063EMI35030N	Pipe
140	East Storage	063EMI35030P	Pipe
141	East Storage	063EMI35030Q	Pipe
142	East Storage	063EMI35030R	Pipe
143	East Storage	063EMI35030T	Pipe
144	East Storage	063EMI35030Y	Pipe

EXHIBIT 2 - EXTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
145	East Storage	063EMI35030Z	Pipe
146	East Storage	063EMI35031G	Pipe
147	East Storage	063EMI35031H	Pipe
148	East Storage	063EMI35031K	Pipe
149	East Storage	063EMI35031L	Pipe
150	East Storage	063EMI35031M	Pipe
151	East Storage	063EMI35031N	Pipe
152	East Storage	063EMI35031R	Pipe
153	East Storage	063EMI35031U	Pipe
154	East Storage	063EMI35032A	Pipe
155	East Storage	063EMI35032AC	Pipe
156	East Storage	063EMI35032AF	Pipe
157	East Storage	063EMI35032AK	Pipe
158	East Storage	063EMI35032B	Pipe
159	East Storage	063EMI35032E	Pipe
160	East Storage	063EMI35032G	Pipe
161	East Storage	063EMI35032N	Pipe
162	East Storage	063EMI35032P	Pipe
163	East Storage	063EMI35032Q	Pipe
164	East Storage	063EMI35032R	Pipe
165	East Storage	063EMI35032X	Pipe
166	East Storage	063EPV17005	Pressure Vessel
167	East Storage	063EPV17006	Pressure Vessel
168	Frac.4	126FL20001A	Pressure Vessel
169	Frac.4	126FL20001B	Pressure Vessel
170	Frac.4	126FL20003A	Pressure Vessel
171	Frac.4	126FL20003B	Pressure Vessel
172	Frac.4	126FL20004	Pressure Vessel
173	Frac.4	126FL20005	Pressure Vessel
174	Frac.4	126FL20006A	Pressure Vessel
175	Frac.4	126FL20006B	Pressure Vessel
176	Frac.4	126FL20045	Pressure Vessel
177	Frac.4	126HT16001	Pressure Vessel
178	Frac.4	126HT16004	Air Cooled Exchanger
179	Frac.4	126HT16005	Shell and Tube Exchanger
180	Frac.4	126HT16006	Air Cooled Exchanger

EXHIBIT 2 - EXTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
181	Frac.4	126HT16009	Shell and Tube Exchanger
182	Frac.4	126HT16014	Shell and Tube Exchanger
183	Frac.4	126HT16016	Shell and Tube Exchanger
184	Frac.4	126HT16018	Shell and Tube Exchanger
185	Frac.4	126HT16021	Shell and Tube Exchanger
186	Frac.4	126HT16032B	Air Cooled Exchanger
187	Frac.4	126HT16033	Air Cooled Exchanger
188	Frac.4	126HT16034	Air Cooled Exchanger
189	Frac.4	126MI35001A	Pipe
190	Frac.4	126MI35001M	Pipe
191	Frac.4	126MI35002D	Pipe
192	Frac.4	126MI35003N	Pipe
193	Frac.4	126MI35004F	Pipe
194	Frac.4	126MI35005L	Pipe
195	Frac.4	126MI35008A	Pipe
196	Frac.4	126MI35009F	Pipe
197	Frac.4	126PV17001	Column
198	Frac.4	126PV17002	Column
199	Frac.4	126PV17003	Column
200	Frac.4	126PV17005	Pressure Vessel
201	Frac.4	126PV17010	Pressure Vessel
202	Frac.4	126PV17012	Column
203	Frac.4	126PV17013	Pressure Vessel
204	Frac.4	126PV17014	Pressure Vessel
205	Frac.4	126PV17015	Pressure Vessel
206	Frac.4	126PV17016	Pressure Vessel
207	Frac.4	126PV17017	Pressure Vessel
208	Frac.4	126PV17027	Pressure Vessel
209	Frac.4	126PV17028	Pressure Vessel
210	Frac.4	126PV17029	Pressure Vessel
211	Frac.4	126PV17030	Pressure Vessel
212	Frac.4	126PV17036	Pressure Vessel
213	Frac.4	126PV17039	Pressure Vessel
214	Frac.4	126PV17040	Pressure Vessel
215	Frac.4	126PV17051	Pressure Vessel
216	Frac.4	126PV17052	Pressure Vessel

EXHIBIT 2 - EXTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
217	Frac.4	126PV17054	Pressure Vessel
218	Frac.4	126SV19003	Storage Tank
219	Frac.5	128FL20001A	Pressure Vessel
220	Frac.5	128FL20001B	Pressure Vessel
221	Frac.5	128FL20002A	Pressure Vessel
222	Frac.5	128FL20002B	Pressure Vessel
223	Frac.5	128FL20003A	Pressure Vessel
224	Frac.5	128FL20003B	Pressure Vessel
225	Frac.5	128FL20004	Pressure Vessel
226	Frac.5	128FL20005	Pressure Vessel
227	Frac.5	128FL20006A	Pressure Vessel
228	Frac.5	128FL20006B	Pressure Vessel
229	Frac.5	128FL20012A	Pressure Vessel
230	Frac.5	128FL20012B	Pressure Vessel
231	Frac.5	128FL20013	Pressure Vessel
232	Frac.5	128FL20014	Pressure Vessel
233	Frac.5	128FL20016	Pressure Vessel
234	Frac.5	128FL20017	Pressure Vessel
235	Frac.5	128FL20042A	Pressure Vessel
236	Frac.5	128FL20042B	Pressure Vessel
237	Frac.5	128FL20045	Pressure Vessel
238	Frac.5	128HT16004	Air Cooled Exchanger
239	Frac.5	128HT16006	Air Cooled Exchanger
240	Frac.5	128HT16008	Air Cooled Exchanger
241	Frac.5	128HT16009	Shell and Tube Exchanger
242	Frac.5	128HT16014	Shell and Tube Exchanger
243	Frac.5	128HT16016	Shell and Tube Exchanger
244	Frac.5	128HT16018	Shell and Tube Exchanger
245	Frac.5	128HT16021	Shell and Tube Exchanger
246	Frac.5	128HT16022	Air Cooled Exchanger
247	Frac.5	128HT16031A	Air Cooled Exchanger
248	Frac.5	128HT16031B	Air Cooled Exchanger
249	Frac.5	128HT16032A	Air Cooled Exchanger
250	Frac.5	128HT16032B	Air Cooled Exchanger
251	Frac.5	128HT16033	Air Cooled Exchanger
252	Frac.5	128HT16034	Air Cooled Exchanger

EXHIBIT 2 - EXTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
253	Frac.5	128MI35001E	Pipe
254	Frac.5	128MI35002F	Pipe
255	Frac.5	128MI35002K	Pipe
256	Frac.5	128MI35003F	Pipe
257	Frac.5	128MI35003M	Pipe
258	Frac.5	128MI35003N	Pipe
259	Frac.5	128MI35004B	Pipe
260	Frac.5	128MI35004E	Pipe
261	Frac.5	128MI35005C	Pipe
262	Frac.5	128MI35005F	Pipe
263	Frac.5	128MI35005M	Pipe
264	Frac.5	128MI35005Q	Pipe
265	Frac.5	128MI35013A	Pipe
266	Frac.5	128MI35014C	Pipe
267	Frac.5	128MI35014F	Pipe
268	Frac.5	128MI35018K	Pipe
269	Frac.5	128PV17001	Column
270	Frac.5	128PV17002	Column
271	Frac.5	128PV17003	Column
272	Frac.5	128PV17005	Pressure Vessel
273	Frac.5	128PV17010	Pressure Vessel
274	Frac.5	128PV17011	Pressure Vessel
275	Frac.5	128PV17013	Pressure Vessel
276	Frac.5	128PV17014	Pressure Vessel
277	Frac.5	128PV17016	Pressure Vessel
278	Frac.5	128PV17017	Pressure Vessel
279	Frac.5	128PV17027	Pressure Vessel
280	Frac.5	128PV17028	Pressure Vessel
281	Frac.5	128PV17029	Pressure Vessel
282	Frac.5	128PV17030	Pressure Vessel
283	Frac.5	128PV17032	Pressure Vessel
284	Frac.5	128PV17034	Pressure Vessel
285	Frac.5	128PV17036	Pressure Vessel
286	Frac.5	128PV17038	Pressure Vessel
287	Frac.5	128PV17051	Pressure Vessel
288	Frac.5	128PV17052	Pressure Vessel

EXHIBIT 2 - EXTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
289	Frac.6	129DH22001	Pressure Vessel
290	Frac.6	129DH22002	Pressure Vessel
291	Frac.6	129FL20001A	Pressure Vessel
292	Frac.6	129FL20001B	Pressure Vessel
293	Frac.6	129FL20002A	Pressure Vessel
294	Frac.6	129FL20002B	Pressure Vessel
295	Frac.6	129FL20003A	Pressure Vessel
296	Frac.6	129FL20003B	Pressure Vessel
297	Frac.6	129FL20004	Pressure Vessel
298	Frac.6	129FL20005	Pressure Vessel
299	Frac.6	129FL20006A	Pressure Vessel
300	Frac.6	129FL20006B	Pressure Vessel
301	Frac.6	129FL20008A	Pressure Vessel
302	Frac.6	129FL20008B	Pressure Vessel
303	Frac.6	129FL20013	Pressure Vessel
304	Frac.6	129FL20014	Pressure Vessel
305	Frac.6	129FL20016	Pressure Vessel
306	Frac.6	129FL20017	Pressure Vessel
307	Frac.6	129FL20045	Pressure Vessel
308	Frac.6	129HT16005	Shell and Tube Exchanger
309	Frac.6	129HT16006	Air Cooled Exchanger
310	Frac.6	129HT16007A	Shell and Tube Exchanger
311	Frac.6	129HT16007B	Shell and Tube Exchanger
312	Frac.6	129HT16008	Air Cooled Exchanger
313	Frac.6	129HT16013	Shell and Tube Exchanger
314	Frac.6	129HT16014	Shell and Tube Exchanger
315	Frac.6	129HT16016	Shell and Tube Exchanger
316	Frac.6	129HT16018	Shell and Tube Exchanger
317	Frac.6	129HT16021	Shell and Tube Exchanger
318	Frac.6	129HT16028	Shell and Tube Exchanger
319	Frac.6	129HT16029A	Shell and Tube Exchanger
320	Frac.6	129HT16029B	Shell and Tube Exchanger
321	Frac.6	129HT16029C	Shell and Tube Exchanger
322	Frac.6	129HT16031	Air Cooled Exchanger
323	Frac.6	129HT16032A	Air Cooled Exchanger
324	Frac.6	129HT16032B	Air Cooled Exchanger

EXHIBIT 2 - EXTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
325	Frac.6	129HT16033	Air Cooled Exchanger
326	Frac.6	129HT16034	Air Cooled Exchanger
327	Frac.6	129MI35001AC	Pipe
328	Frac.6	129MI35001C	Pipe
329	Frac.6	129MI35001G	Pipe
330	Frac.6	129MI35001R	Pipe
331	Frac.6	129MI35001S	Pipe
332	Frac.6	129MI35001V	Pipe
333	Frac.6	129MI35001Y	Pipe
334	Frac.6	129MI35002D	Pipe
335	Frac.6	129MI35002F	Pipe
336	Frac.6	129MI35002J	Pipe
337	Frac.6	129MI35003A	Pipe
338	Frac.6	129MI35003G	Pipe
339	Frac.6	129MI35003H	Pipe
340	Frac.6	129MI35003M	Pipe
341	Frac.6	129MI35004A	Pipe
342	Frac.6	129MI35004E	Pipe
343	Frac.6	129MI35004H	Pipe
344	Frac.6	129MI35005A	Pipe
345	Frac.6	129MI35005C	Pipe
346	Frac.6	129MI35005D	Pipe
347	Frac.6	129MI35005H	Pipe
348	Frac.6	129MI35005T	Pipe
349	Frac.6	129MI35006E	Pipe
350	Frac.6	129MI35006H	Pipe
351	Frac.6	129MI35006L	Pipe
352	Frac.6	129MI35007E	Pipe
353	Frac.6	129MI35007F	Pipe
354	Frac.6	129MI35007G	Pipe
355	Frac.6	129MI35007M	Pipe
356	Frac.6	129MI35008A	Pipe
357	Frac.6	129MI35008B	Pipe
358	Frac.6	129MI35008C	Pipe
359	Frac.6	129MI35009D	Pipe
360	Frac.6	129MI35009J	Pipe

EXHIBIT 2 - EXTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
361	Frac.6	129MI35009N	Pipe
362	Frac.6	129MI35009S	Pipe
363	Frac.6	129MI35010C	Pipe
364	Frac.6	129MI35010G	Pipe
365	Frac.6	129MI35010P	Pipe
366	Frac.6	129MI35010U	Pipe
367	Frac.6	129MI35010W	Pipe
368	Frac.6	129MI35011C	Pipe
369	Frac.6	129MI35011H	Pipe
370	Frac.6	129MI35011K	Pipe
371	Frac.6	129MI35011S	Pipe
372	Frac.6	129MI35012A	Pipe
373	Frac.6	129MI35013A	Pipe
374	Frac.6	129MI35013B	Pipe
375	Frac.6	129MI35013F	Pipe
376	Frac.6	129MI35013G	Pipe
377	Frac.6	129MI35014B	Pipe
378	Frac.6	129MI35014G	Pipe
379	Frac.6	129MI35014J	Pipe
380	Frac.6	129MI35016D	Pipe
381	Frac.6	129MI35018H	Pipe
382	Frac.6	129PV17001	Column
383	Frac.6	129PV17002	Column
384	Frac.6	129PV17003	Column
385	Frac.6	129PV17005	Pressure Vessel
386	Frac.6	129PV17010	Pressure Vessel
387	Frac.6	129PV17011	Pressure Vessel
388	Frac.6	129PV17012	Column
389	Frac.6	129PV17013	Pressure Vessel
390	Frac.6	129PV17014	Pressure Vessel
391	Frac.6	129PV17017	Pressure Vessel
392	Frac.6	129PV17027	Pressure Vessel
393	Frac.6	129PV17029	Pressure Vessel
394	Frac.6	129PV17034	Pressure Vessel
395	Frac.6	129PV17036	Pressure Vessel
396	Frac.6	129PV17038	Pressure Vessel

EXHIBIT 2 - EXTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
397	Frac.6	129PV17041	Pressure Vessel
398	Frac.6	129PV17042	Pressure Vessel
399	Frac.6	129PV17051	Pressure Vessel
400	Frac.6	129PV17052	Pressure Vessel
401	Frac.6	129PV17054	Pressure Vessel
402	Frac.6	129SV19002	Storage Tank
403	Frac.6	129SV19003	Storage Tank
404	Frac.6	129SV19006	Storage Tank
405	Frac.6	129SV19008	Storage Tank
406	Frac.6	129SV19012	Storage Tank
407	High Purity IC4 Dryers	121HT16010	Air Cooled Exchanger
408	High Purity IC4 Dryers	121MI35001D	Pipe
409	Isobutane Cooling Tower	044HT16002	Air Cooled Exchanger
410	Isobutane Cooling Tower	044HT16004	Air Cooled Exchanger
411	Isobutane Cooling Tower	044HT16005	Shell and Tube Exchanger
412	Merox	030MI35001D	Pipe
413	Merox	030PV17001	Pressure Vessel
414	Merox	030PV17005	Pressure Vessel
415	Merox	048FL20002	Pressure Vessel
416	Merox	048FL20007	Pressure Vessel
417	Merox	048PV17015	Column
418	Montell P-L/Arsine Trtr	089FL20001	Pressure Vessel
419	Montell P-L/Arsine Trtr	089FL20004	Pressure Vessel
420	Montell P-L/Arsine Trtr	089PV17001	Pressure Vessel
421	Montell P-L/Arsine Trtr	089PV17002A	Pressure Vessel
422	Montell P-L/Arsine Trtr	089PV17003	Pressure Vessel
423	MTBE Ethermax	102FL20001	Pressure Vessel
424	MTBE Ethermax	102FL20201A	Pressure Vessel
425	MTBE Ethermax	102FL20201B	Pressure Vessel
426	MTBE Ethermax	102FL20203	Pressure Vessel
427	MTBE Ethermax	102FL20204	Pressure Vessel
428	MTBE Ethermax	102HT16101	Shell and Tube Exchanger
429	MTBE Ethermax	102HT16104	Shell and Tube Exchanger
430	MTBE Ethermax	102HT16108	Shell and Tube Exchanger
431	MTBE Ethermax	102HT16203B	Air Cooled Exchanger
432	MTBE Ethermax	102HT16203F	Air Cooled Exchanger

EXHIBIT 2 - EXTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
433	MTBE Ethermax	102HT16208	Shell and Tube Exchanger
434	MTBE Ethermax	102HT16209	Shell and Tube Exchanger
435	MTBE Ethermax	102HT16216	Shell and Tube Exchanger
436	MTBE Ethermax	102HT16402	Shell and Tube Exchanger
437	MTBE Ethermax	102PV17022	Pressure Vessel
438	MTBE Ethermax	102PV17102	Pressure Vessel
439	MTBE Ethermax	102PV17104	Column
440	MTBE Ethermax	102PV17201	Pressure Vessel
441	MTBE Ethermax	102PV17204	Column
442	MTBE Ethermax	102PV17205	Column
443	MTBE Ethermax	102PV17209	Pressure Vessel
444	MTBE Ethermax	102PV17304	Pressure Vessel
445	MTBE Ethermax	102PV17401	Pressure Vessel
446	MTBE Ethermax	102PV17402	Pressure Vessel
447	MTBE Ethermax	102PV17405	Pressure Vessel
448	MTBE Oleflex	101FL20001	Pressure Vessel
449	MTBE Oleflex	101HT16103A	Air Cooled Exchanger
450	MTBE Oleflex	101HT16106A	Air Cooled Exchanger
451	MTBE Oleflex	101HT16106B	Air Cooled Exchanger
452	MTBE Oleflex	101HT16106D	Air Cooled Exchanger
453	MTBE Oleflex	101HT16108	Shell and Tube Exchanger
454	MTBE Oleflex	101HT16109B	Air Cooled Exchanger
455	MTBE Oleflex	101HT16203	Shell and Tube Exchanger
456	MTBE Oleflex	101HT16208A	Shell and Tube Exchanger
457	MTBE Oleflex	101HT16208B	Shell and Tube Exchanger
458	MTBE Oleflex	101HT16310	Shell and Tube Exchanger
459	MTBE Oleflex	101HT16912A	Shell and Tube Exchanger
460	MTBE Oleflex	101HT16912B	Shell and Tube Exchanger
461	MTBE Oleflex	101MI35001B	Pipe
462	MTBE Oleflex	101PV17002	Pressure Vessel
463	MTBE Oleflex	101PV17104	Pressure Vessel
464	MTBE Oleflex	101PV17105	Pressure Vessel
465	MTBE Oleflex	101PV17110	Pressure Vessel
466	MTBE Oleflex	101PV17112	Pressure Vessel
467	MTBE Oleflex	101PV17117	Pressure Vessel
468	MTBE Oleflex	101PV17209	Pressure Vessel

EXHIBIT 2 - EXTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
469	MTBE Oleflex	101PV17210	Pressure Vessel
470	MTBE Oleflex	101PV17211	Pressure Vessel
471	MTBE Oleflex	101PV17212	Pressure Vessel
472	MTBE Oleflex	101PV17306	Pressure Vessel
473	MTBE Oleflex	101PV17308	Pressure Vessel
474	MTBE Oleflex	101PV17400	Pressure Vessel
475	MTBE Utilities	107FL20003	Pressure Vessel
476	MTBE Utilities	107FL20004	Pressure Vessel
477	MTBE Utilities	107HT16007	Air Cooled Exchanger
478	MTBE Utilities	107MI35017B	Pipe
479	MTBE Utilities	107PV17401	Pressure Vessel
480	MTBE Utilities	107PV17501	Pressure Vessel
481	MTBE Utilities	107PV17902	Pressure Vessel
482	MTBE Utilities	107SV19804	Storage Tank
483	MTBE Utilities	107SV19902	Storage Tank
484	MTBE Utilities	107SV19905	Pressure Vessel
485	North Storage	061MI35001B	Pipe
486	North Storage	061MI35001E	Pipe
487	North Storage	061MI35001J	Pipe
488	North Storage	061MI35001K	Pipe
489	North Storage	061MI35003AL	Pipe
490	North Storage	061MI35003AN	Pipe
491	North Storage	061MI35003AY	Pipe
492	North Storage	061MI35007AD	Pipe
493	North Storage	061MI35007AL	Pipe
494	North Storage	061MI35007AW	Pipe
495	North Storage	061MI35007AY	Pipe
496	North Storage	061MI35007BU	Pipe
497	North Storage	061MI35007BW	Pipe
498	North Storage	061MI35007BX	Pipe
499	North Storage	061MI35007CB	Pipe
500	North Storage	061MI35007CC	Pipe
501	North Storage	061MI35007CS	Pipe
502	North Storage	061MI35007CT	Pipe
503	North Storage	061MI35007EA	Pipe
504	North Storage	061MI35007EC	Pipe

EXHIBIT 2 - EXTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
505	North Storage	061MI35007ED	Pipe
506	North Storage	061MI35007EG	Pipe
507	North Storage	061MI35007EM	Pipe
508	North Storage	061MI35007J	Pipe
509	North Storage	061MI35007L	Pipe
510	North Storage	061MI35007X	Pipe
511	North Storage	061MI35007Y	Pipe
512	North Storage	061MI35012A	Pipe
513	North Storage	061MI35012C	Pipe
514	North Storage	061MI35012F	Pipe
515	North Storage	061MI35025H	Pipe
516	North Storage	061MI35025J	Pipe
517	North Storage	061MI35025L	Pipe
518	North Storage	061MI35025S	Pipe
519	North Storage	061MI35026F	Pipe
520	North Storage	061MI35026G	Pipe
521	North Storage	061MI35026J	Pipe
522	North Storage	061MI35026L	Pipe
523	North Storage	061MI35026Q	Pipe
524	North Storage	061MI35026R	Pipe
525	North Storage	061MI35026T	Pipe
526	North Storage	061MI35026U	Pipe
527	North Storage	061PV17001	Pressure Vessel
528	North Storage	061PV17002	Pressure Vessel
529	Oil Tanking Terminal	097HT16004	Shell and Tube Exchanger
530	Oil Tanking Terminal	097HT16005	Shell and Tube Exchanger
531	Oil Tanking Terminal	097HT16006	Shell and Tube Exchanger
532	Oil Tanking Terminal	097MI35002H	Pipe
533	Oil Tanking Terminal	097MI35003AE	Pipe
534	Oil Tanking Terminal	097MI35003H	Pipe
535	Oil Tanking Terminal	097MI35003X	Pipe
536	Oil Tanking Terminal	097PL010	Pipe
537	Oil Tanking Terminal	097PL035	Pipe
538	Oil Tanking Terminal	097PV17007	Pressure Vessel
539	Oil Tanking Terminal	097PV17009	Pressure Vessel
540	Oil Tanking Terminal	097PV17010	Pressure Vessel

EXHIBIT 2 - EXTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
541	P/P Splitter I	078FL20003	Pressure Vessel
542	P/P Splitter I	078FL20006	Pressure Vessel
543	P/P Splitter I	078HT16002	Shell and Tube Exchanger
544	P/P Splitter I	078HT16009	Shell and Tube Exchanger
545	P/P Splitter I	078HT16025	Shell and Tube Exchanger
546	P/P Splitter I	078HT16027	Shell and Tube Exchanger
547	P/P Splitter I	078HT16030	Shell and Tube Exchanger
548	P/P Splitter I	078HT16808	Shell and Tube Exchanger
549	P/P Splitter I	078MI35009A	Pipe
550	P/P Splitter I	078MI35012C	Pipe
551	P/P Splitter I	078PV17003	Pressure Vessel
552	P/P Splitter I	078PV17004	Column
553	P/P Splitter I	078PV17009	Column
554	P/P Splitter I	078PV17010	Pressure Vessel
555	P/P Splitter I	078PV17012	Column
556	P/P Splitter I	078PV17013	Pressure Vessel
557	P/P Splitter I	078PV17014	Column
558	P/P Splitter I	078PV17041	Pressure Vessel
559	P/P Splitter I	078PV17808	Column
560	P/P Splitter I	078SV19007	Pressure Vessel
561	P/P Splitter II	055FL20002	Pressure Vessel
562	P/P Splitter II	055FL20004	Pressure Vessel
563	P/P Splitter II	055FL20022	Pressure Vessel
564	P/P Splitter II	055HT16005	Shell and Tube Exchanger
565	P/P Splitter II	055HT16006	Shell and Tube Exchanger
566	P/P Splitter II	055HT16008	Shell and Tube Exchanger
567	P/P Splitter II	055HT16010	Shell and Tube Exchanger
568	P/P Splitter II	055HT16017	Air Cooled Exchanger
569	P/P Splitter II	055HT16021	Air Cooled Exchanger
570	P/P Splitter II	055PV17002	Column
571	P/P Splitter II	055PV17004	Pressure Vessel
572	P/P Splitter II	055PV17021	Pressure Vessel
573	P/P Splitter II	055PV17024	Pressure Vessel
574	P/P Splitter II	055PV17034	Pressure Vessel
575	P/P Splitter IV	024FL20002	Pressure Vessel
576	P/P Splitter IV	024FL20006	Pressure Vessel

EXHIBIT 2 - EXTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
577	P/P Splitter IV	024FL20007	Pressure Vessel
578	P/P Splitter IV	024FL20008	Pressure Vessel
579	P/P Splitter IV	024FL20022	Pressure Vessel
580	P/P Splitter IV	024FL20026	Pressure Vessel
581	P/P Splitter IV	024HT16004	Shell and Tube Exchanger
582	P/P Splitter IV	024HT16005	Shell and Tube Exchanger
583	P/P Splitter IV	024HT16007	Shell and Tube Exchanger
584	P/P Splitter IV	024HT16011B	Shell and Tube Exchanger
585	P/P Splitter IV	024HT16017	Shell and Tube Exchanger
586	P/P Splitter IV	024HT16018	Shell and Tube Exchanger
587	P/P Splitter IV	024MI35001A	Pipe
588	P/P Splitter IV	024MI35006C	Pipe
589	P/P Splitter IV	024MI35006K	Pipe
590	P/P Splitter IV	024PV17002	Column
591	P/P Splitter IV	024PV17003	Pressure Vessel
592	P/P Splitter IV	024PV17007	Pressure Vessel
593	P/P Splitter IV	024PV17010	Pressure Vessel
594	P/P Splitter IV	024PV17011	Pressure Vessel
595	P/P Splitter IV	024PV17012	Pressure Vessel
596	P/P Splitter IV	024PV17021	Pressure Vessel
597	P/P Splitter IV	024PV17022	Pressure Vessel
598	P/P Splitter IV	024PV17034	Pressure Vessel
599	P/P Splitter IV	024PV17035	Pressure Vessel
600	Pentane Stripper	046HT16905	Air Cooled Exchanger
601	Pentane Stripper	046PV17901	Column
602	Pentane Stripper	046PV17902	Pressure Vessel
603	Seminole Fractionator	042FL20103	Pressure Vessel
604	Seminole Fractionator	042HT16108	Shell and Tube Exchanger
605	Seminole Fractionator	042HT16601	Shell and Tube Exchanger
606	Seminole Fractionator	042HT16604	Shell and Tube Exchanger
607	Seminole Fractionator	042HT16618	Shell and Tube Exchanger
608	Seminole Fractionator	042HT16619	Shell and Tube Exchanger
609	Seminole Fractionator	042HT16621	Shell and Tube Exchanger
610	Seminole Fractionator	042HT16624	Shell and Tube Exchanger
611	Seminole Fractionator	042PV17602	Column
612	Seminole Fractionator	042PV17610	Pressure Vessel

EXHIBIT 2 - EXTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
613	Seminole Fractionator	042PV17611	Pressure Vessel
614	South Plant Flare System	359PV17011	Pressure Vessel
615	Splitter III Unit 1	023AHT16010C	Air Cooled Exchanger
616	Splitter III Unit 1	023AHT16010D	Air Cooled Exchanger
617	Splitter III Unit 1	023AHT16010E	Air Cooled Exchanger
618	Splitter III Unit 1	023AHT16010F	Air Cooled Exchanger
619	Splitter III Unit 1	023AHT16010G	Air Cooled Exchanger
620	Splitter III Unit 1	023AHT16010H	Air Cooled Exchanger
621	Splitter III Unit 1	023AHT16010I	Air Cooled Exchanger
622	Splitter III Unit 1	023AHT16010J	Air Cooled Exchanger
623	Splitter III Unit 1	023AHT16010K	Air Cooled Exchanger
624	Splitter III Unit 1	023AHT16010L	Air Cooled Exchanger
625	Splitter III Unit 2	023BHT16005	Shell and Tube Exchanger
626	Splitter III Unit 2	023BHT16007	Shell and Tube Exchanger
627	Splitter III Unit 2	023BHT16008	Shell and Tube Exchanger
628	Splitter III Unit 2	023BHT16010A	Air Cooled Exchanger
629	Splitter III Unit 2	023BHT16010B	Air Cooled Exchanger
630	Splitter III Unit 2	023BHT16010C	Air Cooled Exchanger
631	Splitter III Unit 2	023BHT16010D	Air Cooled Exchanger
632	Splitter III Unit 2	023BHT16010E	Air Cooled Exchanger
633	Splitter III Unit 2	023BHT16010F	Air Cooled Exchanger
634	Splitter III Unit 2	023BHT16010G	Air Cooled Exchanger
635	Splitter III Unit 2	023BHT16010H	Air Cooled Exchanger
636	Splitter III Unit 2	023BHT16010I	Air Cooled Exchanger
637	Splitter III Unit 2	023BHT16010J	Air Cooled Exchanger
638	Splitter III Unit 2	023BHT16010K	Air Cooled Exchanger
639	Splitter III Unit 2	023BHT16010L	Air Cooled Exchanger
640	Splitter III Unit 2	023BHT16010M	Air Cooled Exchanger
641	Splitter III Unit 2	023BHT16011	Shell and Tube Exchanger
642	Splitter III Unit 2	023BPV17005	Pressure Vessel
643	Splitter III Unit 2	023BPV17006	Pressure Vessel
644	Splitter III Unit 2	023BPV17007	Pressure Vessel
645	Splitter III Unit 2	023BPV17008	Pressure Vessel
646	Splitter III Unit 2	023BPV17012	Pressure Vessel
647	Splitter III Unit 2	023BPV17014	Column
648	Splitter III Unit 2	023BPV17015	Pressure Vessel

EXHIBIT 2 - EXTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
649	Splitter III Unit 2	023BPV17017	Pressure Vessel
650	Splitter III Unit 2	023BPV17019	Column
651	Splitter III Unit 2	023BPV17020	Column
652	Splitter III Unit 2	023BPV17021	Pressure Vessel
653	Splitter III Unit 2	023BPV17022	Pressure Vessel
654	Splitter III Unit 2	023BPV17032	Pressure Vessel
655	Splitter III Unit 3	023CHT16001	Shell and Tube Exchanger
656	Splitter III Unit 3	023CHT16002	Shell and Tube Exchanger
657	Splitter III Unit 3	023CHT16005	Shell and Tube Exchanger
658	Splitter III Unit 3	023CHT16008	Shell and Tube Exchanger
659	Splitter III Unit 3	023CHT16009	Shell and Tube Exchanger
660	Splitter III Unit 3	023CHT16011	Shell and Tube Exchanger
661	Splitter III Unit 3	023CMI35009D	Pipe
662	Splitter III Unit 3	023CMI35010E	Pipe
663	Splitter III Unit 3	023CPV17003	Pressure Vessel
664	Splitter III Unit 3	023CPV17004	Pressure Vessel
665	Splitter III Unit 3	023CPV17005	Pressure Vessel
666	Splitter III Unit 3	023CPV17006	Pressure Vessel
667	Splitter III Unit 3	023CPV17008	Pressure Vessel
668	Splitter III Unit 3	023CPV17009	Pressure Vessel
669	Splitter III Unit 3	023CPV17010	Pressure Vessel
670	Splitter III Unit 3	023CPV17011	Pressure Vessel
671	Splitter III Unit 3	023CPV17012	Pressure Vessel
672	Splitter III Unit 3	023CPV17015	Pressure Vessel
673	Splitter III Unit 3	023CPV17016	Pressure Vessel
674	Splitter III Unit 3	023CPV17017	Pressure Vessel
675	Splitter III Unit 3	023CPV17018	Pressure Vessel
676	Splitter III Unit 3	023CPV17021	Pressure Vessel
677	Splitter III Unit 3	023CPV17022	Pressure Vessel
678	Splitter III Unit 3	023CPV17023	Pressure Vessel
679	Splitter III Unit 3	023CPV17024	Pressure Vessel
680	Splitter III Unit 3	023CPV17032	Pressure Vessel
681	Sulphur Removal Tower	111HT16001	Shell and Tube Exchanger
682	Sulphur Removal Tower	111PV17004	Pressure Vessel
683	W. Texas Fractionator	058HT16005	Shell and Tube Exchanger
684	W. Texas Fractionator	058HT16014	Shell and Tube Exchanger

EXHIBIT 2 - EXTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
685	W. Texas Fractionator	058MI35008H	Pipe
686	W. Texas Fractionator	058MI35008J	Pipe
687	W. Texas Fractionator	058PV17001	Pressure Vessel
688	W. Texas Fractionator	058PV17015	Pressure Vessel
689	W. Texas Fractionator	058PV17016	Pressure Vessel
690	W. Texas Fractionator	058PV17022	Pressure Vessel
691	W. Texas Fractionator	058PV17024	Pressure Vessel
692	W. Texas Fractionator	058PV17025	Pressure Vessel
693	W. Texas Fractionator	058PV17052	Pressure Vessel
694	W. Texas Fractionator	058PV17057	Pressure Vessel
695	W. Texas Fractionator	058PV17065	Pressure Vessel
696	W. Texas Fractionator	058PV17101	Column
697	West Terminal	062PV17004	Pressure Vessel
698	West Terminal	062PV17008	Pressure Vessel
699	West Terminal	062PV17009	Pressure Vessel
700	West Terminal	062PV17010	Pressure Vessel
701	West Terminal	062PV17011	Pressure Vessel
702	West Terminal	062SV19001	Pressure Vessel
703	West Terminal	062SV19002	Pressure Vessel
704	West Terminal	062SV19004	Pressure Vessel
705	West Terminal	062SV19006	Pressure Vessel
706	West Terminal	062SV19012	Pressure Vessel
707	West Texas DIB	082FL20001	Pressure Vessel
708	West Texas DIB	082HT16001	Shell and Tube Exchanger
709	West Texas DIB	082HT16002	Shell and Tube Exchanger
710	West Texas DIB	082HT16005A	Air Cooled Exchanger
711	West Texas DIB	082HT16005B	Air Cooled Exchanger
712	West Texas DIB	082HT16009	Air Cooled Exchanger
713	West Texas DIB	082MI35002B	Pipe
714	West Texas DIB	082MI35002C	Pipe
715	West Texas DIB	082MI35003A	Pipe
716	West Texas DIB	082MI35003C	Pipe
717	West Texas DIB	082PV17003	Pressure Vessel
718	West Texas DIB	082PV17004	Pressure Vessel
719	West Texas Storage	084MI35010C	Pipe
720	West Texas Storage	084MI35011B	Pipe

EXHIBIT 2 - EXTERNAL INSPECTIONS

Inspection No.	Unit Name	EquipmentID	Equipment Type
721	West Texas Storage	084SV19006	Pressure Vessel
722	West Texas Storage	084SV19054	Pressure Vessel
723	West Texas Storage	084SV19601	Pressure Vessel
724	West Texas Storage	084SV19602	Pressure Vessel
725	West Texas Storage	084SV19603	Pressure Vessel
726	West Texas Storage	084SV19604	Pressure Vessel
727	West Texas Storage	084SV19606	Pressure Vessel

EXHIBIT 3 - EXTERNAL INSPECTIONS REQUIRING ADDITIONAL TIME

Inspection No.	Unit Name	EquipmentID	Equipment Type
1	1300 DIB	113HT16002A	Shell and Tube Exchanger
2	1300 DIB	113HT16002A	Shell and Tube Exchanger
3	1300 DIB	113HT16002A	Shell and Tube Exchanger
4	1300 DIB	113HT16002A	Shell and Tube Exchanger
5	200 ISOM	036HT16209	Shell and Tube Exchanger
6	200 ISOM	036PV17004	Pressure Vessel
7	200 ISOM	036PV17212	Column
8	300 DIB	038MI35003G	Pipe
9	700 Towers	052HT16003	Air Cooled Exchanger
10	700 Towers	052HT16004	Air Cooled Exchanger
11	800 Butamer	048PV17006	Pressure Vessel
12	East Storage	063EMI35030AB	Pipe
13	East Storage	063EMI35030X	Pipe
14	Frac.5	128HT16005	Shell and Tube Exchanger
15	Frac.6	129HT16022	Air Cooled Exchanger
16	MTBE Oleflex	101PV17114	Pressure Vessel
17	Oil Tanking Terminal	097MI35003C	Pipe
18	P/P Splitter I	078HT16007A	Air Cooled Exchanger
19	P/P Splitter I	078HT16012	Air Cooled Exchanger
20	P/P Splitter I	078HT16019B	Air Cooled Exchanger
21	P/P Splitter I	078HT16019C	Air Cooled Exchanger
22	P/P Splitter I	078HT16020	Air Cooled Exchanger
23	P/P Splitter I	078HT16026	Shell and Tube Exchanger
24	P/P Splitter II	055HT16002	Shell and Tube Exchanger
25	P/P Splitter II	055SV19007	Pressure Vessel
26	Splitter III Unit 2	023BHT16003	Shell and Tube Exchanger
27	Splitter III Unit 2	023BPV17004	Pressure Vessel
28	Splitter III Unit 2	023BPV17010	Pressure Vessel
29	Splitter III Unit 2	023BPV17011	Pressure Vessel
30	Splitter III Unit 2	023BPV17013	Pressure Vessel
31	Splitter III Unit 2	023BPV17023	Pressure Vessel
32	Splitter III Unit 2	023BPV17024	Pressure Vessel
33	Splitter III Unit 3	023CHT16003	Shell and Tube Exchanger
34	Splitter III Unit 3	023CPV17013	Pressure Vessel
35	Sulphur Removal Tower	111HT16002A	Air Cooled Exchanger
36	Sulphur Removal Tower	111HT16002B	Air Cooled Exchanger

EXHIBIT 3 - EXTERNAL INSPECTIONS REQUIRING ADDITIONAL TIME

Inspection No.	Unit Name	EquipmentID	Equipment Type
37	W. Texas Fractionator	058HT16056B	Air Cooled Exchanger
38	West Terminal	062HT16001	Air Cooled Exchanger
39	West Terminal	062HT16001A	Air Cooled Exchanger
40	West Terminal	062HT16002	Air Cooled Exchanger
41	West Terminal	062HT16002A	Air Cooled Exchanger
42	West Terminal	062SV19013	Pressure Vessel
43	700 Towers	052HT16002	Shell and Tube Exchanger
44	800 Butamer	048HT16002	Shell and Tube Exchanger
45	800 Butamer	048HT16005	Shell and Tube Exchanger
46	800 Butamer	048HT16011A	Shell and Tube Exchanger
47	800 Butamer	048MI35001H	Pipe
48	800 Butamer	048PV17005	Pressure Vessel
49	Defluorinator	120HT16001C	Shell and Tube Exchanger
50	Defluorinator	120HT16002A	Shell and Tube Exchanger
51	Defluorinator	120MI35001A	Pipe
52	Defluorinator	120PV17002	Pressure Vessel
53	Frac.4	126HT16003	Shell and Tube Exchanger
54	Frac.4	126HT16013	Shell and Tube Exchanger
55	Frac.4	126HT16017	Shell and Tube Exchanger
56	Frac.5	128HT16003	Shell and Tube Exchanger
57	Frac.5	128HT16013A/B	Shell and Tube Exchanger
58	Frac.5	128HT16017	Shell and Tube Exchanger
59	Frac.5	128PV17040	Pressure Vessel
60	Frac.6	129HT16003	Shell and Tube Exchanger
61	Frac.6	129HT16004	Air Cooled Exchanger
62	Frac.6	129HT16009	Shell and Tube Exchanger
63	Frac.6	129HT16017	Shell and Tube Exchanger
64	Frac.6	129MI35001M	Pipe
65	Frac.6	129MI35008D	Pipe
66	Frac.6	129MI35014A	Pipe
67	Frac.6	129PV17030	Pressure Vessel
68	Frac.6	129PV17039	Pressure Vessel
69	Frac.6	129PV17040	Pressure Vessel
70	High Purity IC4 Dryers	121HT16009B	Shell and Tube Exchanger
71	MTBE Ethermax	102HT16109	Shell and Tube Exchanger
72	MTBE Ethermax	102HT16217	Shell and Tube Exchanger

EXHIBIT 3 - EXTERNAL INSPECTIONS REQUIRING ADDITIONAL TIME

Inspection No.	Unit Name	EquipmentID	Equipment Type
73	MTBE Ethermax	102HT16301	Air Cooled Exchanger
74	MTBE Oleflex	101HT16101	Shell and Tube Exchanger
75	MTBE Oleflex	101PV17103	Pressure Vessel
76	MTBE Oleflex	101PV17601	Pressure Vessel
77	MTBE Oleflex	101PV17603	Pressure Vessel
78	MTBE Oleflex	101PV17904	Pressure Vessel
79	MTBE Oleflex	101PV17913	Pressure Vessel
80	P/P Splitter I	078PV17016	Pressure Vessel
81	P/P Splitter II	055HT16001	Shell and Tube Exchanger
82	P/P Splitter II	055HT16012	Shell and Tube Exchanger
83	P/P Splitter II	055HT16020	Shell and Tube Exchanger
84	P/P Splitter II	055PV17011	Pressure Vessel
85	P/P Splitter II	055PV17012	Pressure Vessel
86	P/P Splitter IV	024HT16012	Shell and Tube Exchanger
87	W. Texas Fractionator	058HT16010	Shell and Tube Exchanger
88	W. Texas Fractionator	058HT16018	Shell and Tube Exchanger
89	W. Texas Fractionator	058HT16055	Shell and Tube Exchanger