Brian Buchmeier INEOS US Chemicals Company 150 West Warrenville Road Naperville, IL 60563



In response to your recent inquiry regarding HACCP, please find the following response.

The Texas City facility's Quality Control process has been certified per ISO 9001:2015 and has an extensive system to maintain safe operations and product quality -- consisting of standard operating procedures, a quality plan and quality procedures, continuous automatic control (distributed control system), properly designed and maintained equipment, and trained employees. The site has also undergone a HACCP risk assessment and developed a HACCP plan, which incorporates a Food Safety Plan.

No critical control points or operational PRPs were identified.

The acetic acid manufacturing site utilizes a 3rd party auditor to perform the ISO 9001 audit with the following scope of areas audited: Acetic Acid Manufacturing and associated services, Laboratory, Maintenance Customer Service, Purchasing and Stores/Receiving. The processes and procedures audited include Quality Management System, Management Responsibility, Resource Management, Product Realization and Measurement, Analysis and Improvement. Additionally, the site performs internal audits to ensure compliance with cGMP and food grade requirements. A specific 3rd party food safety audit is not performed.

I trust that this information addresses your inquiry.

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Sincerely,

Brian K Buchmeier

Supply Chain Manager, Ineos Acetyls

Ineos US Chemicals Company

II. PROCESS FLOW DIAGRAM

