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Air/Toxics & Inspection
Coordination Branch
6EN-A

August 12, 2014

Mr. Dave Hensley (6EN-AS)
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Clean Air Act Section 114 Request for Information
Williams Olefins, LLC – Geismar Facility

Dear Mr. Hensley:

Williams Olefins, LLC (Williams) received, via Certified Mail, a Request for Information under Section 114(a) of the Clean Air Act, on June 13, 2014. The EPA granted Williams an extension of time until August 13, 2014.

Williams objects to the 114 Request to the extent that the information requested is beyond the scope of Section 114 of the Clean Air Act, 42 U.S.C. § 7411. Williams further objects to the Request to the extent that it is vague, unclear, or ambiguous. Williams further objects to the extent any requests call for documents or information that are privileged or otherwise protected from disclosure. Williams will not produce any such information or documents in response to EPA's request. Subject to such objections, Williams responds to the 114 Request as follows:

QUESTION NO. 1	Who owns and operates the Facility?
RESPONSE NO. 1	The Facility owned by Williams Olefins, LLC and SABIC. Williams Olefins, LLC operates the facility.
QUESTION NO. 2	Is the Facility a stationary source pursuant to 112(r)(2)(C) of the CAA, 42 U.S.C. § 7412? Are the heat exchanger vessels stationary sources pursuant to 112(r)(2)(C) of the CAA, 42 U.S.C. § 7412? Is the propylene fractionation tower a stationary source pursuant to 112(r)(2)(C) of the CAA, 42 U.S.C. § 7412?
RESPONSE NO. 2	Williams objects to this request as vague and ambiguous with reference to "heat exchangers." In responding to this request, Williams understands this phrase to refer to the EA-425A and B

reboilers. Williams further objects that this request calls for a legal conclusion. Without admitting any questions of law, Williams responds that one or more stationary sources exist at the Facility. The EA 425A and B reboilers are part of a stationary source when they are in operation. The DA-406 propylene fractionation tower is part of a stationary source when it is in operation.

QUESTION NO. 3

Limited to regulated substances identified at 112(r)(3) of the CAA, 42 U.S.C. § 7412, or "other extremely hazardous substances" as used in 112(r)(1) of the CAA, 42 U.S.C. § 7412, please identify all substances produced, processed, stored, or handled at the facility, including specifically any associated with the heat exchanger vessels and propylene fractionation tower.

RESPONSE NO. 3

Williams objects that this request calls for a legal conclusion, is vague and ambiguous, and is unduly burdensome. Without admitting any question of law, Williams refers to the 5-year Risk Management Plan update, submitted to EPA on August 7, 2014, which contains responsive information for the facility. The propylene fractionation system separates propylene and propane. Responsive information can be found at WMS_EPA_0000001-18.

QUESTION NO. 4:

Was the heat exchanger vessel that exploded and burned on June 13, 2013, in use at the time of the release, explosion and fire?

RESPONSE NO. 4:

Williams objects that this request assumes facts that are contrary to the evidence. The EA-425B reboiler did not "explode and burn" on June 13, 2013. Williams is informed and believes that the EA-425B reboiler was not in service on June 13, 2013. Responsive information can be found at WMS_0012143.

QUESTION NO. 5

What substances were in the heat exchanger vessel that experienced a release, fire, and explosion on June 13, 2013?

RESPONSE NO. 5

Williams objects that this request assumes facts that are contrary to the evidence. Williams is unable to determine what specific "substances" were in EA-425B at the time of the June 13, 2013 incident.

QUESTION NO. 6

When was the last time, before the release, fire, and explosion that occurred on June 13, 2013, that the heat exchanger had been used? What had it been used for and what substances had been involved in that use?

RESPONSE NO. 6

The EA-425B reboiler was removed from service on or about June 9, 2011. Prior to that date, the EA-425B reboiler heated bottoms materials from the DA-406 tower using quench water. Responsive information can be found at WMS_0003701, 0011435, 0012143, 0026207, and 0026418.

QUESTION NO. 7

Was there a pressure relief device in operation on the heat exchanger vessel that experienced a release, fire, and explosion on June 13, 2013? If so, then was the pressure relief device in use? If not, then please explain why no pressure relief device was in use on that day. How does Williams decide when to have pressure relief available to a piece of equipment? Is there a written process for determining when pressure relief is needed on equipment? If so, then please attach a copy.

RESPONSE NO. 7

Williams objects to this request as vague, ambiguous, and overbroad. There was no dedicated pressure relief device on the out-of service heat exchanger vessel (EA-425B) reboiler that ruptured on June 13, 2013. Pressure relief was to be provided to the heat exchangers serving the propylene tower via a relief valve located on the propylene fractionator tower overhead line as documented in the fractionation section P&ID previously produced to the EPA with the Bates numbers WMS_0009728. That relief valve (SV-421) was in use on the day of the incident. However, the two process block valves on the out-of service EA-425B reboiler were blocked in on the day of the incident, thereby isolating it from SV-421 relief valve. On June 13, 2013 EA-425A was in service; EA-425B was out of service. Williams uses a combination of regularly-scheduled Process Hazard Analysis studies on each operating area of the plant, and pressure relief engineering studies by independent consultants to determine when changes to the pressure relief system are needed. See the PHA excerpts noted in Response Nos. 9 and 10. Williams' written policies and standards for relief system design and overpressure protection are attached at WMS_0009728 and WMS_0049548.

QUESTION NO. 8	When designing the facility why was the heat exchanger vessel located in such close proximity to the propylene fractionation tower? Could it have been placed further away? If not, then please explain.
RESPONSE NO. 8	Williams did not design the facility and therefore is not aware of all the factors that may have been considered in determining the location of the EA-425 reboilers.
QUESTION NO. 9	Has the Facility performed a process hazard analysis related to the heat exchanger vessels? If so, then was the possibility of a release, fire, or explosion in the heat exchanger vessel identified as a potential issue? Please attach a copy of the document.
RESPONSE NO. 9:	Responsive information can be found in the 2011 PHA report, which Williams has already produced to EPA [WMS_0004986 – WMS_0005337].
QUESTION NO. 10	Has the Facility performed a process hazard analysis related to the propylene fractionation tower? If so, then was the possibility of a release, fire, or explosion in the heat exchanger vessel identified as a potential issue? Please attach a copy of the document.
RESPONSE NO. 10	Responsive information can be found in the 2011 PHA report, which Williams has already produced to EPA [WMS_0004986 – WMS_0005337].
QUESTION NO. 11	Provide a detailed timeline of all relevant events leading to, and during, the June 13, 2013, release, fire, and explosion at the facility.
RESPONSE NO. 11	Williams objects that this request is vague and ambiguous. Subject to this objection, and based on clarification provided by EPA on June 30, responsive information can be found at WMS_EPA_0000019_Confidential Business Information.xlsx.
QUESTION NO. 12	Provide a description of the on-site impacts of the release, explosion, and fire that occurred on June 13, 2013, including deaths, injury, or property damage.
RESPONSE NO. 12	Williams provided the requested information in the required 6 month update to the 5 year accident history submitted to EPA via the RMP-Submit program originally on December 12, 2013. The requested information can be found on pages 11-12 of the 5 year

update submitted on August 7, 2014 found at WMS_EPA_0000001-18.

QUESTION NO. 13

Provide a description of the off-site impacts of the release, explosion, and fire that occurred on June 13, 2013, including any impacts of blast, fire or explosion, shelters in place, road closures, etc. Were there any injuries or deaths associated with off-site impacts?

RESPONSE NO. 13

The fire event that occurred on June 13, 2013 did not result in environmental damage or offsite injuries or deaths. Williams understands that despite the lack of offsite impacts, Ascension Parish issued a shelter-in-place notice at 9:10 AM upon receiving a general emergency notification from Williams. Ascension Parish issued an "all clear" notification at 1:25 PM. The Louisiana State Police closed off streets surrounding the facility. Offsite air monitoring did not indicate an exceedance of any ambient air standard. Expert reports (Zannetti and Kind) filed with the U.S. District Court – Eastern District by Williams are attached.

LDEQ posted results of ambient air testing on the website at http://www.deq.louisiana.gov/portal/WilliamsOlefins.aspx

Documents with relevant information can be found at WMS_0012556 and 0061934 and WMS_EPA_0000020-55, 0000056-57 and 0000058-113.

QUESTION NO. 14

Describe all activities undertaken by Williams Olefins in response to the June 13, 2013, release, fire, and explosion at the facility to prevent or mitigate further releases, releases, fires, or explosions at the facility.

RESPONSE NO. 14

Williams objects to this request as vague and ambiguous, overbroad and unduly burdensome. As part of its incident investigation, Williams is developing, tracking and resolving action items. Those action items developed to date are identified in the document labeled WMS_EPA_0000019_Confidential Business Information.xlsx. In addition, Williams is devoted to continuous improvement of its safety programs. These efforts have continued since the June 2013 incident, although not necessarily "in response" to the incident. Such projects have included, among others:

- Inspections and fitness for service evaluations of equipment in the fire zone
- Site-wide pressure relief survey based on API RP 521
- Upgraded safety instrumented systems on furnaces and emergency relief protection on certain pressure vessels
- Brittle fracture screening of all SA-212 pressure vessels

In addition, please see WMS_EPA_000001-18.

QUESTION NO. 15 Has Williams Olefins, LLC, or any contractor or any other party working on behalf of Williams Olefins, undertaken an audit or investigation into the events leading to or causes of the June 13, 2013, release, fire, and explosion at the facility? If so, then please provide a copy of any final or draft copies of the document.

RESPONSE NO. 15 Williams objects that this request to the extent it calls for disclosure of information subject to the attorney client privilege, attorney work product doctrine, and self-critical evaluation privilege. Williams will not provide any privileged information in response to this request. In accordance with regulatory requirements, Williams has been undertaking an investigation of the June 2013 incident. This investigation is not yet complete, and pending results of metallurgical testing being performed by the United States Chemical Safety and Hazard Investigation Board, no final report has been completed or approved. A preliminary, draft document prepared by the investigation team is attached at WMS_EPA_0000019_Confidential Business Information.xlsx. Preliminary information was provided on the 6 month update to the 5 year accident history, originally submitted December 12, 2013 to EPA and revised on August 7, 2014. In addition, preliminary information was provided to the Louisiana Department of Environmental Quality in reports found at WMS_ EPA_0000116-142.

QUESTION NO. 16: Has any insurance company or any entity working on behalf of an insurance company undertaken an audit or investigation into the events leading to or causes of the June 13, 2013, release, fire, and explosion at the facility? If so, then please provide a copy of any final or draft copies of the document.

RESPONSE NO. 16: Williams is not aware of any responsive information.

QUESTION NO. 17: Are you aware of any other audit or investigation into the events leading to, or causes of, the June 13, 2013, release, fire, and explosion at the facility? If so, then please provide a copy of any final or draft copies of the document that are in your possession. Otherwise please identify the individual or entity that has undertaken the audit or investigation, including a contact name, address, and other pertinent contact information.

RESPONSE NO. 17: Williams incorporates its objections and response to Request No. 15. In addition, Williams is informed and believes that OSHA, CSB, the Louisiana Department of Environmental Quality ("LDEQ"), the Louisiana State Police and EPA are conducting or have conducted investigations of the June 13, 2013 incident. See WMS_EPA_0000114-169.

QUESTION NO. 18: Were there trouble shooting activities underway at the time of the release, fire, and explosion on June 13, 2013? If so, then please describe what activities had taken place or may have taken place before the release, fire, and explosion. Were there standard operating procedures (SOPs) for these activities? If so, then please attach copies of all relevant SOPs.

RESPONSE NO. 18: Williams objects that this request is vague and ambiguous, overbroad and unduly burdensome. Subject to this objection, and based on clarifications EPA provided on June 30, Williams is informed and believes that on the morning of June 13, 2013, the quench water pump was switched to the spare to determine if this would provide greater quench water flow. Additional responsive information is included in the document labeled WMS_EPA_0000019_Confidential Business Information.xlsx and WMS_EPA_0000170-211.

QUESTION NO. 19: How many times had the Propylene Fractionator quench water system been trouble shot for low flow prior to the release, fire, and explosion on June 13, 2013?

RESPONSE NO. 19: Williams objects that this request is vague and ambiguous, overbroad, unduly burdensome and calls for speculation. Based on the information currently available to it, Williams is unable to determine what responsive information exists, if any.

QUESTION NO. 20: Describe the operations and maintenance history of the Propylene Fractionator quench water system for the year prior to the release, fire, and explosion on June 13, 2013.

RESPONSE NO. 20: Williams objects that this request is vague and ambiguous. Based on clarification provided by EPA on June 30, Williams understands that this question pertains only to equipment providing quench water to the Propylene Fractionator Reboilers (e.g. the Quench Tower (DA103), Quench Settler (FA114), Quench Water Pump (GA103), Propylene Fractionator Reboiler (EA-425A/B) and Quench Water Coolers (EA-120A/B and EA121). Based on this clarification, Williams responds that the quench water system operated continuously during the year prior to June 13, 2013. Maintenance records for the quench water system for the period June 2012 through June 2013 can be found at WMS_EPA_0000212-283.

QUESTION NO. 21: Does Williams Olefins have a standard of practice or other guideline delineating when a standard operating procedure needs to be written for emergency or temporary operations? Provide documentation of this standard or practice or guideline.

RESPONSE NO. 21: Williams objects that this request is vague and ambiguous. Williams develops operating procedures in accordance with 40 C.F.R. Part 68 and 29 C.F.R. 1910, et seq.

QUESTION NO. 22: What is the schedule for mechanical integrity inspections, both internal and external, for the EA-425B Propylene Fractionator Overhead Reboiler? What is the basis for this schedule?

RESPONSE NO. 22 Williams objects to this request as vague and ambiguous. For clarity, the correct name is for the referenced equipment is Propylene Fractionator Reboiler. Williams understands this request to refer to pressure vessel inspections described in API 510. The frequency of these inspections is determined based on the provisions of API 510 and any applicable legal requirements.

QUESTION NO. 23 When was the last inspection of EA-425B Propylene Fractionator Overhead Reboiler? Please provide the results of this inspection.

RESPONSE NO. 23 The last full inspection of the EA-425B reboiler occurred on November 29, 2005. Points 29-44 were retested on December 8, 2009. Both the 2005 and the 2009 reports are attached. Responsive information can be found at WMS_EPA_0000284-287.

QUESTION NO. 24 Please identify, and provide a copy of, any industry standard, internal standard, or manufacturer's recommendations you followed with respect to the mechanical integrity of piping and related process equipment in the affected process units associated with the release, fire, and explosion on June 13, 2013.

RESPONSE NO. 24: Williams objects that this request is vague and ambiguous, overbroad and unduly burdensome. Subject to this objection, and based on clarification provided by EPA on June 30, Williams responds that it follows API-510 for the inspection of pressure vessels and API-570 for the inspection of piping as documented in the attached internal procedures. Other standards and procedure may apply to a particular piece of equipment, or a specialized form of inspection or testing, depending on the circumstances. Responsive information can be found at WMS_049455-68 andWMS_EPA_0000288-387.

QUESTION NO. 25: On the inspection record of the EA-425A Propylene Fractionator Overhead Reboiler dated October 12, 2010, (WMS_0009799), explain the absence of thickness measurements documented for Test Points 1-28.

RESPONSE NO. 25: In 2005, EA-425A was inspected and metal thickness measurements were made. The inspection report is attached at WMS_EPA_0000388-389. In accordance with API 510, the next inspection is due by 2015. Points 29 through 42 were retested in 2010. Points 1-28 were not included in this retest but will be included in the next scheduled inspection.

QUESTION NO. 26 Were any mechanical integrity issues with EA-425B Propylene Fractionator Overhead Reboiler known prior to June 13, 2013?

RESPONSE NO. 26: Williams objects that this request is vague and ambiguous with respect to the phrase "mechanical integrity issues." Subject to this objection, and based on clarification provided by EPA on June 30, Williams responds that it is not aware of any mechanical integrity issue with EA-425B prior to June 2013. Although not a mechanical integrity issue, a tube leak was discovered in 2012, and corrective action was taken at that time.

QUESTION NO. 27 What safety measures were in place at the time of the incident to prevent over pressurization of EA-425B Propylene Fractionator Overhead Reboiler?

RESPONSE NO. 27: The EA-425B reboiler was cleaned, pressure tested with nitrogen and left-out-of-service.

Enclosure B

Clean Air Act Section 114 Information Request
Statement of Certification

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for submitting false statements and information, including the possibility of fine and imprisonment for knowing violations.

Signature: Larry Bayer

Printed Name: Larry Bayer

Office or Title: Director, Operations and Technical Services

Date: 8-12-14