UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 Ross Avenue

Dallas, Texas 75202-2733

JUN 10 2014

CERTIFIED MAIL – RETURN RECIEPT REQUESTED: 7007 3020 0002 5102 2087

L.G. Bayer
Director, Gulf Olefins Operations
Williams Olefins, LLC
Post Office Box 470
5205 Highway 3115
Geismar, LA 70734

Re: Clean Air Act Section 114 Information Request

Dear Mr. Bayer:

Enclosed is an Information Request (Request) issued to Williams Olefins, LLC's Geismar Olefins Plant under the authority of Section 114 of the Clean Air Act. The purpose of this Request is to obtain information regarding the explosion and fire incident that occurred on June 13, 2013.

Please provide the information requested within thirty (30) working days of your receipt of this letter to Dave Hensley (6EN-AS) at the above address. If you have any questions, need to request an extension, or wish to schedule a meeting to discuss this request, please contact Dave Hensley, of my staff, at 214-665-6739.

Sincerely,

John Blevins
Director
Compliance Assurance and
Enforcement Division

Enclosure

Enclosure A

Information Request
Williams Olefins, LLC's Geismar Olefins Plant

The U.S. Environmental Protection Agency (EPA) Region 6 is issuing this request for information to Williams Olefins, LLC's Geismar Olefins Plant pursuant to Section 114 of the Clean Air Act (CAA), 42 U.S.C. §7414 for the purpose of determining compliance with the CAA, including CAA section 112(r). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Compliance Assurance and Enforcement Division, EPA Region 6. This information request pertains to Williams Olefins, LLC's Geismar Olefins Plant located in Geismar, Louisiana.

You must submit all requested information under an authorized signature on the certification statement in Enclosure B, which provides:

> 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.

We may use any information submitted in response to this request in an administrative, civil, or criminal action.

All information responsive to this Request should be sent to the following:

Dave Hensley (6EN-AS)
U.S. EPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

I. Instructions

1. If information or documentation not known or not available to you as of the date of submission of a response to this Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response, that any portion of the submitted information is

you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response, that any portion of the submitted information is false of misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. There are significant penalties for submitted false information, including the possibility of fine or imprisonment.

2. For each document produced in response to this Request, indicate on the document, or in some other reasonable manner, the number of the question to which it responds. Please submit all information for each question in a logically sequenced, bound format.

3. Please provide a separate response to each question and subpart of a question set forth in this Request and precede each answer with the number of the question to which it corresponds.

4. In your response to each question, identify each person answering the question, including each person answering any subparts of the question, as well as each person consulted in the preparation of your response.

5. For each question, identify each document consulted, examined, or referred to in the preparation of the response or that contains information responsive to the question, and provide a true and correct copy of each such document if not provided in response to another specific question. Indicate on each document produced in response to this Request the number of question to which it corresponds.

6. If you have previously provided information responsive to one or more of the questions in Part IV of this information request, please either (1) re-submit the information with your response to this information request or, (2) in your response to such questions, identify the information previously provided to EPA, indicate the date and the person to whom you provided the information and acknowledge that the certification of your response to this information request (see Enclosure B) also applies to the information you previously submitted. Additionally, please be sure to include the identity of each person answering or consulted in the preparation of previously submitted documents pursuant to instruction number four of this part.

7. Failure to submit requested information in accordance with statutory or regulatory requirements constitutes a violation of the CAA.

II. Confidential Business Information

You must provide the information requested even though you consider it confidential information or trade secrets. You may assert a business confidentiality claim for part or all of the information requested, as described below and set forth in 40 C.F.R. Part 2, Subpart B. Information covered by such a claim will be disclosed by EPA only to the extent and only by the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no confidentiality claim

accompanies the information when EPA receives it, the information may be made available to the public by the EPA without further notice to you. 40 C.F.R § 2.203(a); see also 41 Fed. Reg. 36,902 (Sept. 1, 1976); 43 Fed. Reg. 4,000 (Dec. 18, 1985).

If you wish EPA to treat any information or response as confidential, you must advise EPA and comply with the following procedures. Place on or attach to the information at the time it is submitted to EPA a cover sheet, stamped or typed legend, or other suitable form of notice employing such language as trade secret, proprietary, or company confidential. You must clearly identify allegedly confidential portions of otherwise non-confidential documents and you may want to submit these separately to facilitate identification and handling by EPA. If you seek confidential treatment only until a certain date or until occurrence of a certain event, state this in your notice. Include an explanation of your claim that disclosure of the information would likely result in substantial harmful effects on your business' competitive position, referring to the applicable substantive criteria in 40 C.F.R. § 2.308. Specify the harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and substantial harmful effects. You must make a separate assertion of confidentiality for each response and each record that you consider confidential. Submit a written index for each record for which you assert a claim of confidentiality that includes the following information:

1. Describe the response or document and nature of the information. For a document, include the name of the author(s), the date the document was issued, the summary title, and the names of the recipient(s).

2. Specify the portion of the response or document for which you assert a claim of confidentiality by reference to page numbers, paragraphs, and lines, or specify entire document.

3. Identify the basis of your claim.

If you believe that facts and documents necessary to substantiate confidentiality are themselves confidential, please identify them as such so that EPA may maintain their confidentiality pursuant to 40 C.F.R. Part 2, Subpart B.

III. Definitions

1. Unless specifically defined in this Request or in the CAA or its implementing regulations, all terms used in this Request will have their ordinary meaning

2. The terms "document" or "documents" shall mean written documentation of any kind, including those in a physical or electronic format. It includes any document in the possession or control of the company or the possession or control of any person hired, or working on behalf of, the company. A copy of a document rather than the original may be provided; however, the copy must be an exact replica including any handwritten notes, annotations, etc.

3. The term "Williams Olefins, LLC," or "Williams Olefins," "Williams," or "Company" includes any officer, director, agent, or employee of Williams Olefins, LLC, including any merged, consolidated, or acquired predecessor or any parent, subsidiary, division, or affiliate thereof, and any related partnerships or limited partnerships.

4. The terms "you" or "yours" shall mean Williams Olefins, LLC, as defined in Paragraph 3, above, including the company or corporation, its subsidiaries, divisions, affiliates, predecessors, successors, assigns, and its former and present officers, directors, agents, employees, representatives, attorneys, consultants, accountants and all other persons acting on its behalf.

5. The term "Facility" refers to Williams Olefins, LLC's Geismar Olefins Plant located at 5205 Highway 3115 in Geismar, Louisiana.

6. Words in the masculine shall be construed as the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.

IV. Information Requested

1. Who owns and operates the Facility?

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?

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.

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?

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

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?

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.

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.

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.

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.

11. Provide a detailed timeline of all relevant events leading to, and during, the June 13, 2013, release, fire, and explosion at the facility.

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.

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?

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.

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.

16. Has any insurance company or anyone 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.

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.

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.

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?

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.

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.

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?

23. When was the last inspection of EA-425B Propylene Fractionator Overhead Reboiler? Please provide the results of this inspection.

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 unit/s associated with the release, fire, and explosion on June 13, 2013.

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.

26. Were any mechanical integrity issues with EA-425B Propylene Fractionator Overhead Reboiler known prior to June 13, 2013?

27. What safety measures were in place at the time of the incident to prevent over pressurization of EA-425B Propylene Fractionator Overhead Reboiler?

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: _____

Printed Name: _____

Office or Title: _____

Date: _____