From: Gage, Terry
To: Trawick, Matthew
Subject: RE: Ramsey Gas Plant Incident
Date: Friday, December 08, 2017 11:34:01 AM

Thanks, Matt. The group is meeting next week to get a response over to you. I think we should have that over to you by the end of the week. As far as scheduling for the informal meeting is concerned – how about January 9th at 1pm CST?

Thanks-

Terry L. Gage | Sr. Attorney

Anadarko Petroleum Corporation

From: Trawick, Matthew [mailto:Trawick.Matthew@epa.gov]
Sent: Tuesday, December 5, 2017 3:58 PM
To: Gage, Terry <Terry.Gage@anadarko.com>
Subject: RE: Ramsey Gas Plant Incident

Hi Terry,

I'm glad to hear that you've got a team together, and I certainly understand the holiday slowdown. We can push the formal meeting back to the week of January 8, but we'd like the relevant documentation (PHAs, SOPs, maintenance procedures & records, etc.) to review as soon as possible. I don't think that our request is terribly onerous, but let me know if you think you'll have trouble gathering the documents by December 15.

It's not our Region's usual practice to issue a notice of violation for RMP cases, and I don't foresee issuing one here. We do occasionally issue formal information requests, but we prefer to begin with informal information requests (like my Nov. 29 email) until it becomes necessary to proceed formally.

Feel free to call with any questions or concerns.

Best,

Matt

From: Gage, Terry [mailto:Terry.Gage@anadarko.com]
Sent: Tuesday, December 05, 2017 2:53 PM
To: Trawick, Matthew <Trawick.Matthew@epa.gov>
Subject: RE: Ramsey Gas Plant Incident

Good afternoon, Matthew-

I hope all is well. Sean Urvan forwarded your below correspondence to me and has asked that I take over from here. I have assembled a small team in an effort to gather the necessary information you have requested; however, and as you can imagine, it is difficult at this time of the year to get everyone in one room/on the phone. With this in mind, I am hoping that we can postpone this initial meeting with EPA until January (preferably sometime between the 8th – 16th). Please advise.

Also, does EPA plan on submitting a more formal information request/notice of violation or is that something that we may anticipate coming later in the process, if ever?

Thanks-

Terry L. Gage | Sr. Attorney
Anadarko Petroleum Corporation
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The Woodlands, Texas 77380
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O: 832-636-1404
C: 713-423-5273

Begin forwarded message:

From: "Trawick, Matthew" <Trawick.Matthew@epa.gov>
Date: November 29, 2017 at 2:49:07 PM CST
To: "sean.urvan@anadarko.com" <sean.urvan@anadarko.com>
Subject: Ramsey Gas Plant Incident

Sean,

Thanks for speaking with me today. As I mentioned on the phone, I'm following up on EPA Region 6's investigation of the fire/explosion that occurred at the Ramsey Gas Plant in Orla, Texas ("Facility") on December 3, 2015, as well at EPA's subsequent inspection of that facility on June 29-30, 2016.

Based on documentation provided to EPA inspectors, it appears that the Facility's owners/operators violated one or more of the Part 68 Risk Management Plan regulations promulgated pursuant to the Clean Air Act Section 112(r). In particular, we have identified potential violations related to the following:

1. Performing process hazard analyses pursuant to 40 C.F.R. 68.67(a)&(e);
    a. HARP unit lacked downstream emergency isolation valves
    b. Application of heat to liquid filled closed system
    c. Addressing PHA findings in timely manner based on risk vs. likelihood as a company standard
2. Developing and implementing written operating procedures pursuant to 40 C.F.R. 68.69(a);
    a. Inconsistent diagnosis and handling/removal of methane hydrates
3. Hot work documentation pursuant to 40 C.F.R. 68.85(b);
    a. generalized and unspecific hot work permits
4. Developing and implementing mechanical integrity procedures pursuant to 40 C.F.R. 68.73(b); and
    a. relating to line heater being out of service
5. Updating emergency contact information pursuant to 40 C.F.R. 68.95(b).
    a. Emergency contact numbers incorrect at time of incident – not updated within 12 months of acquisition from Nuevo midstream.

I think that this summary should give you enough information to share with relevant personnel such that we can have a productive teleconference in the next week or two. It would help if your team could gather documentation relevant to the items above, and also have a description of steps the Facility has taken to prevent recurrence. I'd like to schedule a call for the week of December 11, provided that you'll have enough time to get everyone on the same page. Please feel free to call with any questions or concerns.

Best,

Matt
Matthew K. Trawick
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