LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
INTRA-AGENCY ROUTING FORM

TO: Enforcement Division

FROM: ERSD

Routing Date: 9/7/2022

Facility Information

Company Name: Westlake Vinyls, Company LP

Facility Site Name: Geismar Facility

Agency Interest No: 1138	**Alt. AI No:**
Mailing Address: P.O. Box 228	**Physical Address:** 36045
Street:	**Street** Louisiana Hwy. 30
City, State, Zip: Geismar, LA. 70734	**City, Parish** Geismar, Ascension

Responsible Party/Contact Person: Ryan Estevens

Responsible Party/Contact Person Telephone No: 225 313 9501

Inspection/Referral Information

Inspection Date: 6/9/2022 Hours Spent On Inspection/Report: 11

Media: Check all that apply

Air (inc. asbestos/lead):	☒	Water:	☐	Haz. Waste:	☐	Risk MPs:	☐	Remediation:	☐
Solid Waste (inc. tires):	☐	UST:	☐	Radiation:	☐	Stage 1 & 2:	☐		

Complaint? ☐ Yes ☐ No	**Follow up?** ☐ Yes ☐ No	*If yes*
		Enforcement Action Number

Inspector/Team Leader Name: Nathan Prince

Inspector/Team Leader Contact No.: 225 219 3464

Approved By:		**Date:**	10/3/22
Approved By:		**Date:**	
Circuit Rider Review:		**Date**	

Revised 02/08/2013

Basis for Routing (check all that apply)			
Areas of Concern: ☐		**Contamination Above RECAP:** ☐	
☐ **Conveyance Notice Only**		**TEMPO Task ID No:**	
Other: ☐	Please Explain:		

Additional Information: *This section should state the specific reason for the referral, actions that have been taken by the referring division and supporting documentation. This section should also provide sufficient discussion and/or documentation for the Division receiving the referral to take action including documentation of events leading to the referral and company contact information.*

On June 8, 2022, Westlake Vinyls Company (WVC) reported a release of multiple chemicals at their Geismar facility. Within the Vinyl Chloride Monomer via Ethylene (VCM-E) Plant, a power loss occurred resulting in an air release from the HCl Vent Tank Scrubber (VTS) and Pressure Safety Valves (PSVs). WVC investigated the incident and determined that the release was caused when a power transformer was inadvertently energized. This caused a current imbalance in the electrical grid and resulted in a breaker trip; sending gasses in the plant to the HCl VTS (EQT 0093 83-01) and PSVs (FUG 0002). The HCl VTS and the PST are permitted emission points within Part 70 Permit Number 1248-VII: effective November 1, 2021.

In response to the release, starting at approximately 4:40 p.m., the Ascension Parish Sheriff's Office and Hazmat group closed LA Hwy 30 at WVC's Gate and Industrial Road; LA Hwy 75 at Enlink's gate; LA Hwy 73 at Cornerview Road. The road closures were lifted approximately 20 minutes later at 5:03 p.m. A complete listing of the times is attached to this report. The release of the chemicals created an *emergency condition* resulting in WVC's Incident Commander to issue a Level-2 Site Area Emergency that prompted the Parish to close multiple roads to protect the community. In addition, four (4) contractors and one (1) WVC employee was evaluated for exposure to the hydrogen chloride, was cleared and released to return to work.

LAC 33.I.3925 – Failure to submit a written notification report that contains the required information. As required by LAC 33:I.3915, notification requirements for Unauthorized Discharges that Cause Emergency Conditions. More specifically, WVC failed to account for road closures that the Parish initiated in response to the release.

On June 15, 2022 and August 5, 2022, LDEQ received WVC's required Seven (7) day and 60 day written notifications. In both documents, WVC failed to include the offsite road closures that Ascension Parish initiated due to WVC's issuance of a Level-2 Site Area Emergency.

In addition, "question 6" of the written notification shall include a statement of the actual or probable fate of the pollutants and the result of the off-site impact must be addressed. WVC's failure to address the road closure and "question 6" is in violation of LAC 33:I.3925.B.6, the requirements of written notification reports.

LAC 33:III.905.A – unauthorized release from a permitted emission point. More specifically, several chemicals were released in excess of their reportable quantities (RQs) during a release on 6/8/2022. The permitted emission points of the release were the HCl Vent Tank Scrubber (EQT 0093 (83-01)) and Pressure Safety Valves (FUG 0002).

In this incident carbon tetrachloride, chloroform, ethyl chlcride, ethylene dichloride, and vinyl chloride were released to the atmosphere in excess of their RQs. The amcunt released and RQ for these chemicals is: 556 lbs. (10 lbs. RQ), 457 lbs. (10 lbs. RQ), 167 lbs. (100 lbs. RQ), 9428 lbs. (100 lbs. RQ), and 14321 lbs. (1 lbs. RQ) respectively.

Based on the root cause analysis, WVC determined that this release was preventable.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
INCIDENT REPORT
Incident:209043

Incident Description

Incident Type:	Release/Spill, Facility Air Release
Incident Date:	06/08/2022 16:30:00
Parish:	Ascension
Municipality:	Geismar
Location:	36045 HWY 30 - Geismar
Lat/Lon:	/
Basin/Segment:	
Substance(s):	Carbon tetrachloride Chloroform 457 lbs., Ethyl Chloride 167 lbs., Ethylene Dichloride 9428 lbs. Vinyl chloride
Media Impacted:	Air
Incident Desc:	SPILLRelease of vapor to air from facility due to unknown cause CML

Incident Status

Lead Investigator:	Nathan Prince
Incident Region:	Capital
Incident Status:	Referred to Enforcement NP 9/7/2022
Followup Status:	Referred to Enforcement
As Of:	09/07/2022 14:11:59 CTF 9/14/22

Incident Reporter 1

Received By:	Spo Contact
Received Date:	06/08/2022 17:55:00
Dispatch Number(s):	1338183, 22-03111
Reported By:	Ray Kirk
Phone:	225-673-0377 (Work phone number)
Reporter Title:	
Organization:	Westlake Chemical
Address:	
Municipality:	
State:	LA
Zip Code:	
Comments:	

INCIDENT REPORT

Incident:209043

Incident Source 1

Source Name: Westlake Vinyls Co LP

Address: 36045 Hwy 30

Municipality: Geismar

State: LA

Phone: 2256730647(Work phone number)

Parish:

AI #: 1138

Related Permits:

Comments: On June 8, 2022, Westlake Vinyls Company. LP reported a release of multiple chemicals at their Geismar facility. Within the VCME Plant, a power loss occurred and resulted in an air release from the HCl Vent Tank Scrubber (VTS) and Pressure Safety Vavles (PSVs). Westlake investigated the incident and determined that the release was caused when a power transformer was inadvertedly energized. This caused a current imbalance in the electrical grid and resulted in a breaker trip; sending gasses in the plant to the HCl VTS (EQT 0093 83-01) and PSVs (FUG 0002).

In this incident Carbon Tetrachloride, Chloroform, Ethyl Chloride, Ethylene Dichloride, and Vinyl Chloride were released to the atmosphere in excess of their reportable quantities. The amount released and RQ for these chemicals is: 556 lbs. vs 10 lbs. RQ, 457 lbs. vs 10 lb. RQ, 167 lbs. vs 100 lb. RQ, 9428 lbs. vs 100 lb. RQ, 14321 lbs. vs 1 lbs. RQ, respectively.

Based on the root cause analysis, Westlake Chemical determined that this release was preventable. The HCl VTS and PSVs are permitted emission points within Part 70 Permit Number 1248-V11. In response to the release, the Ascension Parish Sheriffs Office and Hazmat group closed LA Hwy 30 at the Westlake Gate and Industrial Rd; LA Hwy 75 at Enlink's gate; LA Hwy 73 at Cornerview Rd. The road closures were lifted approximately 20 minutes later at 5:03 p.m. A complete listing of the times is attached to this report.

This incident is being referred to enforcement for LAC 33:III.905.A and LAC 33.I.3925 - Failure to submit all the necessary information in a written notification. NRP

Nathan Prince

Subject: CRO SPILL T 209043 Ascension LSP#22-03111

Importance: High

CRO SPILL T 209043 Ascension LSP#22-03111

Sent: Thursday, June 9, 2022 7:46 AM
To: Nathan Prince; _DEQ-CROcallouts
Subject: # 22-03111

Sent: Thursday, June 9, 2022 7:23 AM
Subject: LSP Hazardous Material Incident Incident # 22-03111

INCIDENT # 22-03111 SOURCE: STATE POLICE HAZMAT HOTLINE
877-925-6595 / 225-925-6595

** (INITIAL REPORT) DATE AND TIME **********
HOTLINE NOTIFIED: 06/08/22 17:00
INCIDENT OCCURRED: 06/08/22 16:26

** (INITIAL REPORT) INCIDENT LOCATION **********
PARISH: Ascension
ADDRESS: 36054 HWY 30
CITY: Geismar

** (INITIAL REPORT) CALLER INFORMATION **********
CALLER'S NAME: Deputy Tullier
CALLER'S ADDRESS OR EMPLOYER: Ascension Parish Sheriffs Office
CALLER'S PHONE NUMBER: 225-621-8300 opt. 1

** (INITIAL REPORT) RESPONSIBLE PARTY **********
NAME: Westlake

** (INITIAL REPORT) DETAILS **********
Road Closures: HWY 73 @ Industrial, HWY 73 @ Cornerview, HWY 75 @ IMTT, HWY 75 @ Ienlink, HWY 30 @ Gateway... Road Closures are reopening at this time... 17:02 downgraded from level 2 alert to level 1... Police on scene, no medical needed at this time, Fire Department has cleared at thsi time... Will update if they upgrade or downgrade...

** (INITIAL REPORT) CHEMICAL INFORMATION **********
CHEMICAL 1: Hydrochloric Acid
RELEASED STATE: CLASS: Corrosive ID: 1789 EHS: No

CHEMICAL 2: Vyinal Chloride Monomer

** (INITIAL REPORT) RELEASE INFORMATION **********
INCIDENT CLASSIFICATION: Unusual Event
DID MATERIAL GO OFFSITE? Yes
RELEASED TO: Unknown
ANY OFF-SITE PROTECTIVE ACTION?
ROAD CLOSURE: Yes
SHELTER IN PLACE: No
EVACUATION: No

RELEASE EFFECTS:
FIRE: No
INJURIES: No :
FATALITIES: No :

** (INITIAL REPORT) WEATHER **********
WIND OUT OF: mph TEMP: 91 F PRECIPITATION: Clear

** (UPDATE TO THE REPORT) DETAILS **********
PERSON/REPRESENTING: Ray Kirk/ Westlake
PHONE: 225-673-0377/225-290-6820
Ray was unaware of road closures... Vapor release to air...

** (UPDATE TO THE REPORT) DETAILS **********
PERSON/REPRESENTING: INV. Hall
PHONE: 225-938-2810
Hall was advised

** (UPDATE TO THE REPORT) DETAILS **********
PERSON/REPRESENTING: Deput Armenio/ Ascension Parish Sheriff Office
PHONE: 225-621-8300
Road blocks are clear at this time

** (UPDATE TO THE REPORT) DETAILS **********
PERSON/REPRESENTING: DeputyTullier/ Ascension Parish Sheriff Office
PHONE: 225-621-8300
MOVED DOWN TO CARE ALERT

** (UPDATE TO THE REPORT) DETAILS **********
PERSON/REPRESENTING: National Response Center
PHONE: 800-424-8802
NRC Report # 1338183...

Westlake

Post Office Box 228, 36045 Hwy 30 • Geismar, Louisiana 70734
Tel 225/673-6121 • Fax 225/673-0644

June 15, 2022

Surveillance Division - SPOC
Louisiana Department of Environmental Quality
P.O. Box 4312
Baton Rouge, LA 70821-4312
Attention : Office of Environmental Compliance – SPOC
UNAUTHORIZED DISCHARGE NOTIFICATION REPORT

Certified Mail 7020 3160 0001 8985 2815
Return Receipt Requested

Subject: Unauthorized Discharge Notification Report – Westlake Vinyls Company, LP
Agency Interest Number 1138
Louisiana State Police (LSP) Incident 22-03111
Ascension Parish Sheriff's Office (APSO) Incident 2022-21349

This letter is being submitted in order to provide information relating to a release that occurred on June 8, 2022 at Westlake Vinyls Company (WVC) located at 36045 Highway 30, Geismar, LA, and Agency Interest Number 1138. The release, which involved WVC's VCME-E Plant, was reported to Ascension Parish Sheriff's Office, Louisiana State Police, and National Response Center.

Enclosed is the required follow-up incident report and attached release calculations. At this time, the cause of incident remains under investigation. An update will be provided within 60 days.

Should you have any questions concerning this issue, please contact me at 225-673-0656 or restevens@westlake.com.

Regards,

Ryan Estevens
HSE Manager
Westlake Vinyls Company, LP

Enclosure

bcc w/attachments:

File: AIR.2.A.1

H:\Environmental\2022 Correspondence Scans\Unauthorized Discharge Notification Report

Westlake Vinyls Company
Incident Report for Incident Number 22-03111

1. The name, address, telephone number, Agency Interest (AI) number (number assigned by the department) if applicable, and any other applicable identification numbers of the person, company, or other party who is filing the written report, and specific identification that the report is the written follow-up report;

Company Name:	**Westlake Vinyls Company (WVC)**
Physical Location:	**LA Hwy 73 & 30, 36045 Highway 73**
St. or P.O. Box:	**P.O. Box 228 Geismar, LA 70734**
Telephone Number:	**225-673-0600**
Agency Interest Number:	**1138**
Incident Number:	**22-03111**

2. The time and date of prompt notification, the state official contacted when reporting, the name of the person making that notification, and identification of the site or facility, vessel, transport vehicle, or storage area from which the unauthorized discharge occurred;

Date and Time of verbal notification:	**6/8/2022 @ 5:18 PM**
LSP official contacted:	**Kaylee**
Unauthorized Discharge Location:	**VCME Plant**
Company official who made the call:	**Ray Kirk, Sr. Environmental Engineer**
Telephone Number:	**225-673-0600**

Date and Time of verbal notification:	**6/8/2022 @ 4:20 PM**
LEPC official contacted:	**Dispatch**
Company official who made the call:	**Jeff Harrell, Shift Supervisor**
Unauthorized Discharge Location:	**VCME Plant**
Incident Number	**2021-25967**

3. Date(s), time(s), and duration of the unauthorized discharge and, if not corrected, the anticipated time it is expected to continue;
The incident began at approximately 4:16 PM on 6/8/2022 and ended at approximately 6:37 PM on 6/8/2022.

4. Details of the circumstances (unauthorized discharge description and root cause) and events leading to any unauthorized discharge, including incidents of loss of sources of radiation, and if the release point is subject to a permit:

a. Details
The incident occurred in the VCME Plant. A power loss resulted in a release to the air from the HCl Vent Tank Scrubber, and a release to the air from Pressure Safety Valves (PSVs). The root cause of the power loss is still under investigation. WVC will provide an update to this report after the investigation is complete.

b. the current permitted limit for the pollutant(s) released;

c. the permitted release point/outfall ID; and

d. which limits were exceeded (SO2 limit, mass emission limit, opacity limit, etc.) for air releases;

The HCl Vent Tank Scrubber is permitted as Emission Point EQT 0093 (83-01) under Part 70 Permit Number 1248-V11. It is permitted for the following maximum emission rates:

- **Carbon Monoxide (CO): 73.67 lbs/hr**
- **Volatile Organic Compounds (VOCs): 676.44 lbs/hr**
- **1,2-Dichloroethane: 466.49 lbs/hr**

The PSVs are LDAR components permitted under Emission Point FUG 0002 under Part 70 Permit Number 1248-V11. The applicable limits that were exceeded are as follows:

- **VOCs 2.76 lb/hr**
- **1,2-Dichloroethane: 2.03 lb/hr**

5. The common or scientific chemical name of each specific pollutant that was released as the result of an unauthorized discharge, including the CAS number and U.S. Department of Transportation hazard classification, and the best estimate of amounts of any or all released pollutants (total amount of each compound expressed in pounds, including calculations);
See Attachment 1.

6. A statement of the actual or probable fate or disposition of the pollutant or source of radiation and what off-site impact resulted;
Release was to the atmosphere as a vapor. No offsite impacts were reported.

7. Remedial actions taken, or to be taken, to stop unauthorized discharges or to recover pollutants or sources of radiation;
Upon discovery, operations took immediate actions to shut down equipment safety.

8. Procedures or measures which have or will be adopted to prevent recurrence of the incident or similar incidents, including incidents of loss of sources of radiation;
At this time, the cause of the incident remains under investigation. WVC will provide an update to this report after the investigation is complete.

9. If an unpermitted or unlicensed site or facility is involved in the unauthorized discharge, a schedule for submitting a permit or license application to the department, or rationale for not requiring a permit or license;
NA

10. The reporting party's status (former or present owner, operator, disposer, etc.);
Present owner/operator.

11. For discharges to the ground or groundwater, the following information shall also be included: all information of which the reporting party is aware that indicates pollutants are migrating, including, but not limited to, monitoring well data; possible routes of migrations; and all information of which the reporting party is aware regarding any public or private wells in the area of the migration used for drinking, stock watering, or irrigation;
NA

12. What other agencies were notified;
Louisiana State Police (22-03111)
Ascension Parish LEPC (2022-21349)
National Response Center (1338183)

13. The names of all other responsible parties of which the reporting party is aware;
No other responsible parties.

14. A determination by the discharger of whether or not the discharge was preventable, or if not, an explanation of why the discharge was not preventable;
At this time, the cause of the incident remains under investigation. WVC will provide an update to this report after the investigation is complete.

15. The extent of injuries, if any; and
Four contractors and one Westlake employee were evaluated for exposure and released to full duty. None of them received medical treatment.

16. The estimated quantity, identification, and disposition of recovered materials, if any.
Not Applicable

I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Company Official: Signature: _____
John Scroggins

Title: Plant Manager

Date: 6-15-2022

Attachment 1 - Release Summary

Chemical	CAS#	DOT Hazard Classification	Total Released (lbs)	RQ (lbs)	RQ Release (Yes/No)
1,1-Dichloroethane	75-34-3	Flammable Liquid	105.77	1000	No
1,2-Dichloroethylene	156-60-5	Flammable Liquid	0.05	1000	No
Benzene	71-43-2	Flammable Liquid	3.37	10	No
Carbon Dioxide	124-38-9	Nonflammable Gas	0.62	NA	No
Carbon Monoxide	630-08-0	Poison Gas, Flammable Gas	0.72	NA	No
Carbon Tetrachloride	**56-23-5**	**Poison**	**556.39**	**10**	**Yes**
Chloroform	**67-66-3**	**Poison**	**457.11**	**10**	**Yes**
Chloroprene	126-99-8	Flammable Liquid	0.62	100	No
Ethyl Chloride	**75-00-3**	**Flammable Gas**	**166.66**	**100**	**Yes**
Ethylene	74-85-1	Flammable Gas	61.88	1,000	No
Ethylene Dichloride	**107-06-2**	**Flammable Liquid, Poison**	**9,428.32**	**100**	**Yes**
Hydrogen Chloride	7647-01-0	Poison Gas, Corrosive	2,115.41	5,000	No
Trichloroethylene	79-01-6	Poison	85.92	100	No
Vinyl Chloride	**75-01-4**	**Flammable Gas**	**14,321.20**	**1**	**Yes**
Vinylidene Chloride	75-35-4	Flammable Liquid	0.12	100	No

	Start Time	End Time	duration (seconds)	
UVS Bypass	6/8/2022 16:16	6/9/2022 0:05	28140	
			28140	Power outage, Primary Incinerator and Oxy Incinerator tripped at 16:16 Vents back in incinerator at 00:05.
Area 1 LE Column Vent	6/8/2022 16:16	6/8/2022 16:43	1620	Area 1 LE vent closed at 16:43
Area 79 LE Column Vent	6/8/2022 16:16	6/8/2022 17:13	3420	Area 79 LE Column vent closed at 17:13
PVC Dry Vent	Closed			Closed when Incinerator tripped.
PVC Wet Vent	Closed			Closed when Incinerator tripped.
Recycle Column	6/8/2022 16:16	6/8/2022 16:40	1440	Recycle Column vent closed at 18:16
Wash System	6/8/2022 16:16	6/8/2022 22:41	23100	
Old Stripper	6/8/2022 16:16	6/8/2022 16:28	720	Feed and steam out at 19:43
New Stripper	6/8/2022 16:16	6/8/2022 16:43	1620	Feed and steam out at 19:43
R101A	6/8/2022 16:16	6/8/2022 16:16	0	R101A not running
R101B	6/8/2022 16:16	6/8/2022 16:16	0	R101B not running
Oxy A Train	6/8/2022 16:16	6/8/2022 16:18	120	Oxy A tripped at same time as incinerators 16:16, oxy vent closed at 16:18
Oxy B Train	6/8/2022 16:16	6/8/2022 16:18	120	Oxy B tripped at same time as incinerators 16:16, oxy vent closed at 16:18
Recovery Columns	6/8/2022 16:16	6/8/2022 18:38	8520	Recovery column vent closed @ 18:38
Mole Sieve	6/8/2022 16:16	6/8/2022 16:16	0	Not regenerating mole sieve
VCM Column PSV	6/8/2022 16:30	6/8/2022 16:32	120	VCM column relieved to atmosphere PSV design relief rate 274,623 lb/hr
VCM Column Vent	6/8/2022 16:32	6/8/2022 17:18	2760	VCM condenser vents open 40% . Flow calculated using valve Cv.
VCM Reboiler PSV	6/8/2022 16:30	6/8/2022 16:32	120	VCM reboiler PSV rated flow 145818 lb/hr
HCl Column PSV	6/8/2022 16:17	6/8/2022 16:26	540	HCl column PSV - 95% recovery in Emergency Vent Scrubber rated flow 258487 lb/hr
HCl Column Reboiler	6/8/2022 16:18	6/8/2022 16:21	180	HCL Reboiler PSV rated flow 127,259 lb/hr
Quench Accumulator	6/8/2022 16:20	6/8/2022 16:21	60	Quench Accumulator 2x3 PSV, rated flow 27319 lb/hr

Incinerator Bypass Totals (pounds)

Component	Area 1 LE	Area 79 LE	Recovery Col	Area 1 Wash	Recycle Col	Old Stripper	New Stripper	R101A/B	PVC Vents	A Oxy Vent	B Oxy Vent	Mole Sieve Dryer	VCM Column PSV	VCM Condenser Vent	VCM Reboiler PSV	Quench Accum PSV	HCL Column PSV	HCl Col Reboiler PSV	Total	Avg	Permitted	Released vs Permitted	RQ
	lb	lb	lb	lb	lb	lb	lb	lb	lb	lb	lb	lb							lb	lb/hr	lb/hr	lb	lb
Ethylene	7.5	49.7		0	7.1			0.0		0.9	1.6								61.9			61.9	1,000
Carbon Dioxide										0.2	0.4								0.6			0.6	
Carbon Monoxide										0.3	0.4								0.7			0.7	
Argon																			0.0			0.0	
HCl																176.8	1938.7		2115.4			2115.4	5000
Vinyl Chloride	67.0	9.9		0.0	0.8	0.1	0.1					0.00	9154.1	1873.3		252.9		2962.9	14321.2			14321.2	1
Ethyl Chloride	23.9	142.6			0.0					0.0	0.0								166.7			166.7	100
1,1-Dichloroethylene					0.1														0.1			0.1	100
1,2-Dichloroethylene					0.1														0.1			0.1	1000
Carbon Tetrachloride	297.0	252.9			6.6														556.4			556.4	10
Chloroform	110.1	345.7			0.3	0.2	0.4												457.1			457.1	10
EDC	80.6	172.9	290.5	298.8	200.5	16.7	61.6	0.0		0.1	0.3				4860.6	25.6		3400.0	9428.3			9428.3	100
TriCl Ethylene(E)	0.4	2.5	10.0	69.9	3.2					0.0	0								85.9			85.9	100
1,1-Dichloroethane	79.3	24.0			2.4														105.8			105.8	1000
Benzene	0.5	0.0			2.9														3.4			3.4	10
Chloroprene	0.5	0.1			0.1														0.6			0.6	100

PSV Totals	EDC	VCM	HCl
9154.1		9154.1	
		1873.3	
4860.6	4860.6		
1938.7			1938.7
6362.9	3400.0	2962.9	
455.3	25.6	252.9	176.8

Westlake

Post Office Box 228, 36045 Hwy 30 ▪ Geismar, Louisiana 70734
Tel 225/673-6121 ▪ Fax 225/673-0644

Re: LSP Incident #22-03111 / NRC report # [1338183]/ AI#

Nathan,

Per our phone conversation of June 24th and your email inquiry of the same day, I am responding by this email to provide the additional information you have requested related to the release event which took place at Westlake's Geismar facility on 6/8/2022. In response to that release event, Westlake made timely initial notifications, and has made every effort to be open and transparent through meetings, emails, phone calls, and written reports following the initial verbal notifications.

The safety of the community and personnel is Westlake's top priority. The Westlake Incident Commander's first response action was a Level 2 – Site Area Emergency notice to the Ascension Parish Sherriff's Office indicating the incident may affect the near-site population. This was done in an effort to ensure precautions were implemented as quickly as possible.

We have diligently reviewed information and timeline details internally in order to provide follow up information on this release event. Please see the responses below in bold to your specific follow up inquiries.

1. On 6/8/2022 how did Westlake Chemical determine that HCl and VCM were being released?
   The incident began at approximately 4:16 PM on 6/8/2022 and ended at approximately 6:37 PM. While the release remained ongoing, site personnel utilized available information including visual observations, gas detection, and process knowledge to estimate the nature, quantity, and potential off-site impacts considering the exigency of the circumstances. Notifications were made immediately (within one hour of discovery) in accordance with this initial information, while the release was still ongoing.

   Following the initial notification to the hotline ((225) 925-6595), for the remaining duration of the incident, and after the all clear had been issued, the site personnel did not observe or identify any: (1) adverse changes in the nature or rate of the discharge, (2) any different causes or sources of the discharge, or (3) any substantial difference in the nature of the discharges.

2. What time and date did Westlake Chemical initially determine that Carbon Tetrachloride, ethylene dichloride, and chloroform were being released to the atmosphere?
   Preliminary calculation numbers that identified these chemicals began on the morning of 6/9/2022 at an estimated time of 8:00 AM.

3. How did Westlake Chemical determine the chemicals in question #2 were being released?
Site engineers began work on preliminary release calculations on the morning of 6/9/2022 at an estimated time of 8:00 AM, utilizing process information from the Digital Control System (DCS), review of post incident process conditions, and sampling results. At that time, the event release had been stopped and the all clear issued for approximately 13 hours. These initial calculations developed the morning of 6/9 were finalized over the next few days and submitted within seven calendar days of the release with the required 7-day written report.

Westlake hopes this information meets LDEQ's needs and clarifies any open questions you have on the release event of 6/8/2022. If we can provide any further information please feel free to contact me directly at (225) 673-0656.

Regards,

Ryan Estevens

Ryan Estevens
HSE Manager
Westlake Vinyls Company, LP

2022-21349 Westlake 6/8/22 16:26:25

Road Blocks and times roads were closed

30@ Gateway - 16:40
75 @ Enlink gate - 16:47:15
73 @ Cornerview - 16:45:24
30 @ Industrial - 16:52:30
75 @ IMTT – No time available – event was downgraded before it was blocked

I am not finding any radio traffic on D3 or Hazmat about A221 going on scene at 75/IMTT before it was downgraded; called for a clear of all road blocks at 17:03:38.

Long version if you want this

Road Blocks and times roads were closed

30@ Gateway - A845 at a detail will block 30/Gateway 16:40 (Methanex Construction entrance) along with A317
75 @ Enlink gate - A309 X97 75/Enlink 16:47:15
73 @ Cornerview - A321 X97 16:45:24
30 @ Industrial - A317 X97 30/Industrial 16:52:30
75 @ IMTT - A221 going to 75/IMTT 16:36:42 / A221 er r IMTT 16:58:45

I am not finding any radio traffic on D3 or Hazmat about A221 going on scene at 75/IMTT before it was downgraded.
Called for a clear of all road blocks at 17:03:38

8/5/22

Westlake

Post Office Box 228, 36045 Hwy 30 Geismar, Louisiana 70734
Tel 225/673-6121 Fax 225/673-0644

August 5, 2022

Surveillance Division - SPOC
Louisiana Department of Environmental Quality
P.O. Box 4312
Baton Rouge, LA 70821-4312
Attention : Office of Environmental Compliance – SPOC
UNAUTHORIZED DISCHARGE NOTIFICATION REPORT

Certified Mail 7020 3160 0001 8985 2945
Return Receipt Requested

Subject: 60 Day Unauthorized Discharge Notification Report – Westlake Vinyls Company, LP
Agency Interest Number 1138
Louisiana State Police (LSP) Incident 22-03111
Ascension Parish Sheriff's Office (APSO) Incident 2022-21349

This letter is being submitted to provide additional information relating to a release that occurred on June 8, 2022 at Westlake Vinyls Company (WVC) located at 36045 Highway 30, Geismar, LA, and Agency Interest Number 1138. The release, which involved WVC's VCME-E Plant, was reported to Ascension Parish Sheriff's Office, Louisiana State Police, and National Response Center.

Enclosed is the updated follow-up incident report and attached release calculations.

Should you have any questions concerning this issue, please contact me at 225-673-0656 or restevens@westlake.com.

Regards,

Ryan Estevens

Ryan Estevens
HSE Manager
Westlake Vinyls Company, LP

Enclosure

RECEIVED
ON
AUG 16 2022
BY
LDEQ/SPOC

bcc w/attachments:
File: AIR.2.A.1
H:\Environmental\2022 Correspondence Scans\Unauthorized Discharge Notification Report

Westlake Vinyls Company
Incident Report for Incident Number 22-03111

1. The name, address, telephone number, Agency Interest (AI) number (number assigned by the department) if applicable, and any other applicable identification numbers of the person, company, or other party who is filing the written report, and specific identification that the report is the written follow-up report;

Company Name:	**Westlake Vinyls Company (WVC)**
Physical Location:	**LA Hwy 73 & 30, 36045 Highway 73**
St. or P.O. Box:	**P.O. Box 228 Geismar, LA 70734**
Telephone Number:	**225-673-0600**
Agency Interest Number:	**1138**
Incident Number:	**22-03111**

2. The time and date of prompt notification, the state official contacted when reporting, the name of the person making that notification, and identification of the site or facility, vessel, transport vehicle, or storage area from which the unauthorized discharge occurred;

Date and Time of verbal notification:	**6/8/2022 @ 5:18 PM**
LSP official contacted:	**Kaylee**
Unauthorized Discharge Location:	**VCME Plant**
Company official who made the call:	**Ray Kirk, Sr. Environmental Engineer**
Telephone Number:	**225-673-0600**

Date and Time of verbal notification:	**6/8/2022 @ 4:20 PM**
LEPC official contacted:	**Dispatch**
Company official who made the call:	**Jeff Harrell, Shift Supervisor**
Unauthorized Discharge Location:	**VCME Plant**
Incident Number	**2021-25967**

3. Date(s), time(s), and duration of the unauthorized discharge and, if not corrected, the anticipated time it is expected to continue;
The incident began at approximately 4:16 PM on 6/8/2022 and ended at approximately 6:37 PM on 6/8/2022.

4. Details of the circumstances (unauthorized discharge description and root cause) and events leading to any unauthorized discharge, including incidents of loss of sources of radiation, and if the release point is subject to a permit:

a. Details
The incident occurred in the VCME Plant. A power loss resulted in a release to the air from the HCl Vent Tank Scrubber, and a release to the air from Pressure Safety Valves (PSVs). The root cause was determined to be inadvertent energization of a transformer causing a current imbalance resulting in a breaker trip.

b. the current permitted limit for the pollutant(s) released;

c. the permitted release point/outfall ID; and

d. which limits were exceeded (SO2 limit, mass emission limit, opacity limit, etc.) for air releases;

The HCl Vent Tank Scrubber is permitted as Emission Point EQT 0093 (83-01) under Part 70 Permit Number 1248-V11. It is permitted for the following maximum emission rates:

- **Carbon Monoxide (CO):** **73.67 lbs/hr**
- **Volatile Organic Compounds (VOCs):** **676.44 lbs/hr**
- **1,2-Dichloroethane:** **466.49 lbs/hr**

The PSVs are LDAR components permitted under Emission Point FUG 0002 under Part 70 Permit Number 1248-V11. The applicable limits that were exceeded are as follows:

- **VOCs** **2.76 lb/hr**
- **1,2-Dichloroethane:** **2.03 lb/hr**

5. The common or scientific chemical name of each specific pollutant that was released as the result of an unauthorized discharge, including the CAS number and U.S. Department of Transportation hazard classification, and the best estimate of amounts of any or all released pollutants (total amount of each compound expressed in pounds, including calculations);
See Attachment 1.

6. A statement of the actual or probable fate or disposition of the pollutant or source of radiation and what off-site impact resulted;
Release was to the atmosphere as a vapor. No offsite impacts were reported.

7. Remedial actions taken, or to be taken, to stop unauthorized discharges or to recover pollutants or sources of radiation;
Upon discovery, operations took immediate actions to shut down equipment safety.

8. Procedures or measures which have or will be adopted to prevent recurrence of the incident or similar incidents, including incidents of loss of sources of radiation;
WVC will review site power redundancy, electrical coordination, and energy isolation procedures, and implement changes as applicable.

9. If an unpermitted or unlicensed site or facility is involved in the unauthorized discharge, a schedule for submitting a permit or license application to the department, or rationale for not requiring a permit or license;
NA

10. The reporting party's status (former or present owner, operator, disposer, etc.);
Present owner/operator.

11. For discharges to the ground or groundwater, the following information shall also be included: all information of which the reporting party is aware that indicates pollutants are migrating, including, but not limited to, monitoring well data; possible routes of migrations; and all information of which the reporting party is aware regarding any public or private wells in the area of the migration used for drinking, stock watering, or irrigation:
NA

12. What other agencies were notified:
Louisiana State Police (22-03111)
Ascension Parish LEPC (2022-21349)
National Response Center (1338183)

13. The names of all other responsible parties of which the reporting party is aware:
No other responsible parties.

14. A determination by the discharger of whether or not the discharge was preventable, or if not, an explanation of why the discharge was not preventable:
WVC has determined the discharge was preventable.

15. The extent of injuries, if any; and
Four contractors and one Westlake employee were evaluated for exposure and released to full duty. None of them received medical treatment.

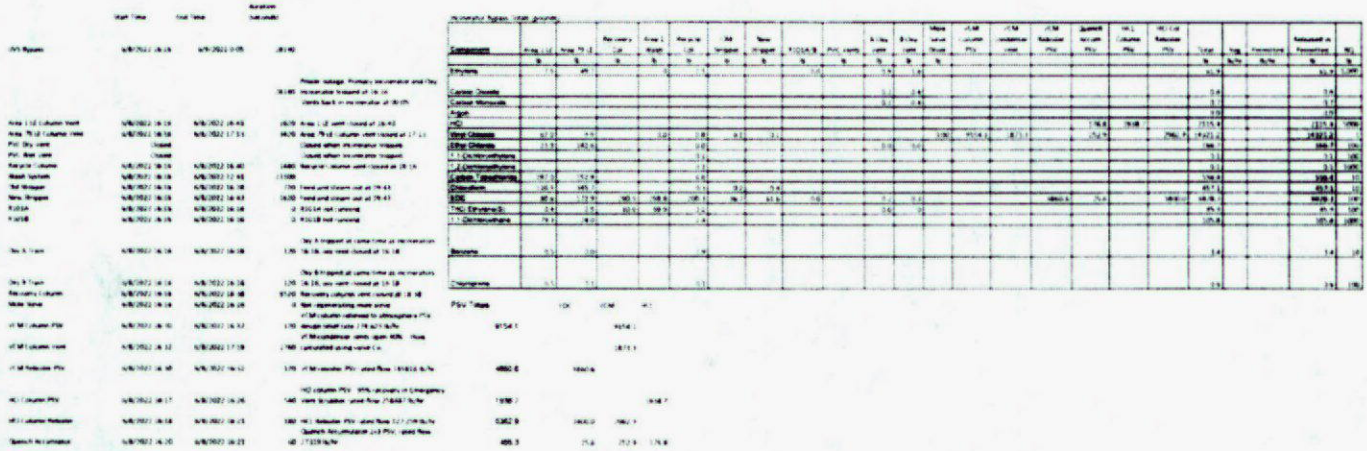
16. The estimated quantity, identification, and disposition of recovered materials, if any.
Not Applicable

I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Company Official: Signature: John Scroggins

Title: Plant Manager

Date: 8-5-2022

Attachment 1 - Release Summary

Chemical	CAS#	DOT Hazard Classification	Total Released (lbs)	RQ (lbs)	RQ Release (Yes/No)
1,1-Dichloroethane	75-34-3	Flammable Liquid	105.77	1000	No
1,2-Dichloroethylene	156-60-5	Flammable Liquid	0.05	1000	No
Benzene	71-43-2	Flammable Liquid	3.37	10	No
Carbon Dioxide	124-38-9	Nonflammable Gas	0.62	NA	No
Carbon Monoxide	630-08-0	Poison Gas, Flammable Gas	0.72	NA	No
Carbon Tetrachloride	**56-23-5**	**Poison**	**556.39**	**10**	**Yes**
Chloroform	**67-66-3**	**Poison**	**457.11**	**10**	**Yes**
Chloroprene	126-99-8	Flammable Liquid	0.62	100	No
Ethyl Chloride	**75-00-3**	**Flammable Gas**	**166.66**	**100**	**Yes**
Ethylene	74-85-1	Flammable Gas	61.88	1,000	No
Ethylene Dichloride	**107-06-2**	**Flammable Liquid, Poison**	**9,428.32**	**100**	**Yes**
Hydrogen Chloride	7647-01-0	Poison Gas, Corrosive	2,115.41	5,000	No
Trichloroethylene	79-01-6	Poison	85.92	100	No
Vinyl Chloride	**75-01-4**	**Flammable Gas**	**14,321.20**	**1**	**Yes**
Vinylidene Chloride	75-35-4	Flammable Liquid	0.12	100	No