



Tulane Environmental Law Clinic

April 22, 2013

Reference No. 101-055.1

CERTIFIED MAIL

7010 0780 0002 1577 5934

RETURN RECEIPT REQUESTED

Mr. Paul Stratford, Site Manager

ExxonMobil Chemical Co.

Baton Rouge Chemical Plant

4999 Scenic Highway, P.O. Box 241

Baton Rouge, LA 70805-3359

CERTIFIED MAIL

7010 0780 0002 1577 5941

RETURN RECEIPT REQUESTED

Corporation Service Company

(As registered agent for Exxon Mobil Corporation)

320 Somerulos St.

Baton Rouge, LA 70802-6129

CERTIFIED MAIL

7010 0780 0002 1577 5958

RETURN RECEIPT REQUESTED

Bob Perciasepe, Acting Administrator

U.S. Environmental Protection Agency

Ariel Rios Building

1200 Pennsylvania Avenue, N.W.

Mail Code 1101A

Washington, DC 20460-0001

CERTIFIED MAIL

7010 0780 0002 1577 5965

RETURN RECEIPT REQUESTED

Peggy M. Hatch, Secretary

Louisiana Department of Environmental Quality

Office of the Secretary

P.O. Box 4301

Baton Rouge, LA 70821-4301

Re: 60 Days Notice of Violations and Intent to File Citizen Suit Against Exxon Mobil Corporation d/b/a ExxonMobil Chemical Co., 40 C.F.R. § 54.3(b)
Pursuant to Clean Air Act 42 U.S.C. § 7604(b)(1)(A)

Dear Mr. Stratford, Mr. Perciasepe and Ms. Hatch:

This letter provides notice under Clean Air Act, 42 U.S.C. § 7604(b)(1)(A), and 40 C.F.R. §54.3(b) that Louisiana Environmental Action Network (“LEAN”) and Ms. Stephanie Anthony intend to file a citizen suit against ExxonMobil Corporation d/b/a ExxonMobil Baton Rouge Chemical Company (“ExxonMobil”) for ongoing violations of the Clean Air Act, including but not limited to violations of 42 U.S.C. § 7661a(a).

Tulane Environmental Law Clinic

6329 Freret St., Ste. 130, New Orleans, LA 70118-6231 tel 504.865.5789 fax 504.862.8721 www.tulane.edu/~telc

The law requires us to provide advance notice of this lawsuit in part to give the parties an opportunity to try to resolve the issues that this notice raises without litigation. We would be pleased to use this time to explore a cooperative resolution of the violations we allege here.

Persons Giving Notice:

Louisiana Environmental Action Network
P.O. Box 66323
Baton Rouge, Louisiana 70896
Phone: (225) 928-1315

Ms. Stephanie Anthony
7741 Governor Derbigny Drive
Baton Rouge, Louisiana 70811

LEAN is an incorporated, non-profit community organization whose purpose is to preserve and protect Louisiana's land, air, water, and other natural resources, and to protect the organization's members who live, work, and recreate within the state from threats of pollution, including harmful emissions from chemical plants. LEAN has members who live, work, and recreate in or near Baton Rouge, an area designated as non-attainment for ozone. ExxonMobil's unpermitted discharges of air contaminants, which include toxic air pollutants and potent ozone precursors, contribute to air pollution that impairs LEAN members' quality of life and enjoyment of the area and poses risks to those members' health.

Ms. Anthony is a long-time resident of Baton Rouge and resides less than 6 miles from the plant. Ms. Anthony is concerned about the health, safety, and negative environmental impacts associated with ExxonMobil's unpermitted discharges of air contaminants.

LEAN and Ms. Anthony's Counsel:

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Lisa W. Jordan, SBN: 20451
Tulane Environmental Law Clinic
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New Orleans, LA 70118
Phone: (504) 862-8818 (Babich) (504) 314-2481 (Jordan)
Fax: (504) 862-8721

Person Responsible for Alleged Violations:

ExxonMobil Corporation d/b/a/ ExxonMobil Chemical Company (ExxonMobil), as owner and operator of the Exxon Mobil Baton Rouge Chemical Plant in Baton Rouge, Louisiana, is responsible for the violations that this notice raises.

Locations of the Violations:

ExxonMobil's violations have occurred and continue to occur at the ExxonMobil Baton Rouge Chemical Plant located at 4999 Scenic Highway, Baton Rouge, Louisiana 70805-3359.

Dates of the Violations:

The violations that are the subject of this notice began by at least January 1, 2009 and are ongoing.

Description of ExxonMobil's Clean Air Act Violations:

Section 7661a(a) of the Clean Air Act provides that "it shall be unlawful for any person to violate any requirement of a permit." Sections 7604(a) & (f) impose liability for violation of any "emission standard or limitation," including without limitation any "applicable State implementation plan." Paragraphs A through D, below, describe ExxonMobil's violations of 42 U.S.C. §7661a(a) and other "emission standards or limitations," as 42 U.S.C. § 7604(f) defines that phrase.

These lists of violations are not exhaustive. LEAN and Ms. Anthony intend to include in their lawsuit additional violations, legal or factual, revealed in the course of investigation or discovery, including, without limitation, violations that occur after submission of this notice.

- A. Reported Permit Violations:** ExxonMobil violates the Act by discharging air pollutants from its facility in excess of permit limits or without appropriate permits for such discharges, and by violating other permit conditions.

ExxonMobil is in violation of the Act because, in the course of operating the facility at 4999 Scenic Highway, ExxonMobil repeatedly discharges air contaminants such as, but not limited to, Carbon Monoxide, and Nitrogen Oxide, and hazardous air pollutants including, but not limited to, 1,3-Butadiene, Benzene, Propylene, Ethylene, and other unauthorized substances in violation of its permits and/or without an applicable permit. Exxon also violates other permit conditions.

By way of example and not limitation, LEAN and Ms. Anthony present an illustrative list of these violations in Table 1, based on publicly available information. Based on a review of the permits and ExxonMobil's own reports, the emissions in Table 1 (attached) violate the requirements of ExxonMobil's permits or are not covered by any permit.

- B. Violations of Reporting Requirements:** ExxonMobil violates the Act by failing to meet the notification requirements of La. Admin. Code 33:I.39 and the Act.

ExxonMobil is in violation of the Act because it repeatedly fails to: 1) provide timely notification to the Louisiana Department of Environmental Quality after an unauthorized discharge, 2) file required follow-up written reports, and 3) provide all information required by

the Clean Air Act, the state implementation plan and ExxonMobil's permits in Unauthorized Discharge Notification Reports and other incident reports.

By way of example and not limitation, LEAN and Ms. Anthony present an illustrative list of these violations in Table 2 (attached). LEAN and Ms. Anthony base Table 2 on publicly available information. Based on a review of reports by the Louisiana Department of Environmental Quality and ExxonMobil's own reports, the listed instances in which notifications were incomplete, not timely or not appropriately followed-up violate reporting requirements of the permits held by ExxonMobil.

C. Additional Violations (on information and belief): In addition to the violations noted above, ExxonMobil is in violation of the Act because of additional excess emissions, described below.

By way of example and not limitation, LEAN and Ms. Anthony present an illustrative list in Table 3 (attached) of incidents that, on information and belief, are violations of ExxonMobil's permit(s) and the Clean Air Act. Table 3 is based on publicly available information. These allegations of permit violations are made upon information and belief because ExxonMobil's reports are insufficient to reliably link the reported excess emissions with applicable permit limits.

D. Failure to Maintain a Safe Facility and to Appropriately Maintain Equipment

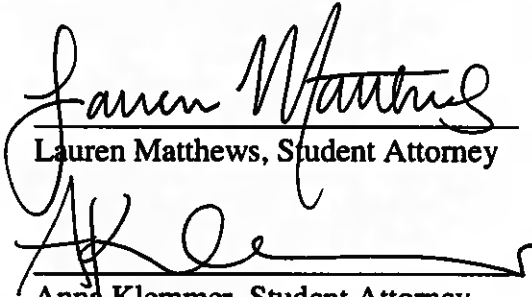
The violations alleged in paragraphs A through C above demonstrate that ExxonMobil has failed to maintain its facility, including associated air pollution control equipment in a manner "consistent with good air pollution control practice for minimizing emissions" at all times, including periods of startup, shutdown, and malfunction. This is a violation of ExxonMobil's duties under its permits and the Act, including without limitation 40 C.F.R. § 60.11(d).

Final Note

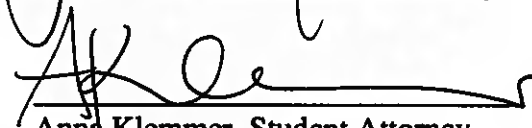
Should ExxonMobil find any part of this letter inaccurate or otherwise disagree with the letter's contents, please contact us as soon practical. Again, we would welcome the opportunity to discuss any part of this letter during the notice period.

ExxonMobil Chemical Plant
Notice of Violation
April 22, 2013
Page 5 of 5

Substantially prepared by:

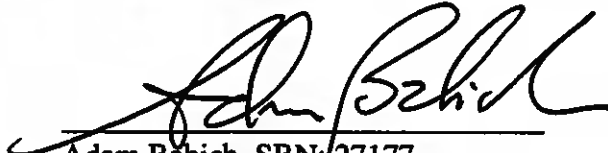


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Counsel for Louisiana Environmental
Action Network and Stephanie Anthony

Cc:

CERTIFIED MAIL

7010 0780 0002 1577 5972

RETURN RECEIPT REQUESTED

**Ron Curry, Administrator for Region Six
United States Environmental Protection
Agency, Region Six
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2711**

TABLE 1.

Doc ID	Incident Date	Permit No	Reported Details	Source Point/ Unit	Chemical Emitted (where available)
8433260, 8570451, 856249, 8458721	6/14/12	(2299-V5), 2795-V6, 2234-V5, 2363-V3, 2341-V2	emission exceedances	Aromatics Tank 801, bleeder plug failure	Benzene
8433260, 8570451, 856249, 8458721	6/14/12	(2299-V5), 2795-V6, 2234-V5, 2363-V3, 2341-V2	emission exceedances	Aromatics Tank 801, bleeder plug failure	Toluene
8433260, 8570451, 856249, 8458721	6/14/12	(2299-V5), 2795-V6, 2234-V5, 2363-V3, 2341-V2	emission exceedances	Aromatics Tank 801, bleeder plug failure	Cyclohexane
8433260, 8570451, 856249, 8458721	6/14/12	(2299-V5), 2795-V6, 2234-V5, 2363-V3, 2341-V2	emission exceedances	Aromatics Tank 801, bleeder plug failure	Hexane
8433260, 8570451, 856249, 8458721	6/14/12	(2299-V5), 2795-V6, 2234-V5, 2363-V3, 2341-V2	emission exceedances	Aromatics Tank 801, bleeder plug failure	additional VOCs
8125078	5/31/11	2390-V1	emission exceedances	M-1000 flare cap	chloroethane
8125078	5/31/11	2390-V1	emission exceedances	M-1000 flare cap	Chloroform
8125078	5/31/11	2390-V1	emission exceedances	M-1000 flare cap	Methyl Bromide
8125078	5/31/11	2390-V1	emission exceedances	M-1000 flare cap	Methylene Chloride
7801248	2010	2390-V1	emission exceedances; also exceeded interim limits in compliance order 09-0197	Infrastructure; EIQ# M-1000 (GRP092)	Toulene and SO2

Doc ID	Incident Date	Permit No	Reported Details	Source Point/ Unit	Chemical Emitted (where available)
7645098	2010	2166-V2	exceeded 2010 annual permit limits	Halobutyl; EQT-0982; EQT-0974	VOC, n-hexane
7645098	12/5/09	2365-V2	vent gas from Towers T-710 and T-740 vented to the atmosphere; vented to furnace F-635; failure to vent streams to furnace is a violation.	OXO Alcohol; Towers T-710 and T-740	Not Available
6654495	11/30/09	2012-V2	Turbine Generator lost NOx suppression steam due to drop in temperature; caused a 10 minute exceedance of NOx concentration in the exhaust (approx. 4.5 lbs of excess NOx released)	Baton Rouge Turbine Generator	NOx
7645098	11/6/09	2031-V7	SACC "F" Furnace (Furnace FF-01, EI# S-06) exceeded 20% opacity, due to tube leak	Maintrain Ethylene Production; SACC "F" Furnace FF-01 EI# S-06	Not Available
7645098	10/2/09	2031-V7	SACC "B" Furnace (Furnace BF-01, EI# S-02) exceeded 20% opacity, due to tube leak	Maintrain Ethylene Production; SACC "B" Furnace BF-01, EI# S-02	Not Available
6654495	discovered 6/18/09	1924-V3	open ended lines	Isopropyl Alcohol	Not Available
6654495	5/20/09	2031-V7	Furnace smoked for approx. 3 hours and 20 minutes due to a tube leak.	Maintrain Ethylene Production; SACC "A" Furnace AF-01 EI# S-01	Not Available
6654495	5/20/09	2031-V7	Furnace smoked for approx. 9 minutes due to a tube leak.	Maintrain Ethylene Production; SACC "G" Furnace GF-01 EI# S-07	Not Available

Doc ID	Incident Date	Permit No	Reported Details	Source Point/ Unit	Chemical Emitted (where available)
6654495	5/20/09	2379-V0	Furnace smoked for approx. 10 minutes due to a mechanical lag in oxygen supply.	Neo Acids	Not Available
6654495	discovered 4/27/09	2166-V1	Tank was equipped with a vapor mounted primary seal instead of required liquid mounted seal.	Halobutyl; Tank 1987 (Group I Storage Vessel)	Not Available
6654495	4/21/09	2396-V0	2 bleeder valves with missing plugs discovered, violated 40 CFR Subpart FFFF	POLY/No.5 Light Ends	Not Available
6654495	discovered April 2009	2367-V1	open ended lines	Co-Products	Not Available
6461570	3/9/09	2031-V6	Exceeded the reportable quantity of benzene (15 lbs released in 17 minutes, over RQ of 10lbs); failure to diligently maintain facility.	Maintrain Ethylene Production; WILA Tanks 8 & 9	Benzene
6461570	2/17/09	2390-V1	>20% opacity from flares; chemicals released above reportable quantity. Each exceedance is a violation of specific requirements 7, 213, and 316 of the permit.	Infrastructure; EPLA-W Compressor; Flares 10, 25, 26; Benzene Hydrotreating Unit	Sulfur Dioxide
6461570	2/17/09	2390-V1	>20% opacity from flares; chemicals released above reportable quantity. Each exceedance is a violation of specific requirements 7, 213, and 316 of the permit.	Infrastructure; EPLA-W Compressor; Flares 10, 25, 26; Benzene Hydrotreating Unit	Ethylene

Doc ID	Incident Date	Permit No	Reported Details	Source Point/ Unit	Chemical Emitted (where available)
6461570	2/17/09	2390-V1	>20% opacity from flares; chemicals released above reportable quantity. Each exceedance is a violation of specific requirements 7, 213, and 316 of the permit.	Infrastructure; EPLA-W Compressor; Flares 10, 25, 26; Benzene Hydrotreating Unit	Benzene
6461570	2/17/09	2390-V1	>20% opacity from flares; chemicals released above reportable quantity. Each exceedance is a violation of specific requirements 7, 213, and 316 of the permit.	Infrastructure; EPLA-W Compressor; Flares 10, 25, 26; Benzene Hydrotreating Unit	Nitrogen Oxide
6461570	2/17/09	2390-V1	>20% opacity from flares; chemicals released above reportable quantity. Each exceedance is a violation of specific requirements 7, 213, and 316 of the permit.	Infrastructure; EPLA-W Compressor; Flares 10, 25, 26; Benzene Hydrotreating Unit	1, 3 Butadiene
6461570	2/17/09	2390-V1	>20% opacity from flares; chemicals released above reportable quantity. Each exceedance is a violation of specific requirements 7, 213, and 316 of the permit.	Infrastructure; EPLA-W Compressor; Flares 10, 25, 26; Benzene Hydrotreating Unit	Propylene
6654495	2/14/09	2031-V7	Furnace smoked for approx. 4 minutes due to a tube leak	Maintrain Ethylene Production; SACC "A" Furnace AF-01 EIQ #S-01	Not Available
6654495	2/5/09	2031-V7	Furnace smoked for 25 minutes due to tube leak	Maintrain Ethylene Production; SACC "A" Furnace AF-01 EIQ #S-01	Not Available
6650794	1/10/09	1200-V3; 2012-V0	exceeded emission limits	Baton Rouge Turbine Generator	VOC, NOx
6654495	Jan 2009	2367-V1	open ended lines	Co-Products	Not Available

Doc ID	Incident Date	Permit No	Reported Details	Source Point/ Unit	Chemical Emitted (where available)
7645098	2009	2295-V5, 2361-V1, 2031-V7, 2393-V1, 2396-V0, 2166-V2, 2376-V1,	27 Open Ended Lines		Not Available
7645098	2009	2390-V1	exceeded annual permit limit for E1Q3M-I000 Flare Gas Recovery (9.325 tpy instead of .86 tpy)	Infrastructure; EQ3M-1000	Not Available
7645098	2009	2166-V1	exceeded 2009 annual VOC permitted limits by 1.89 tpy for EQT0974 secondary wastewater emissions and by 4.44 tpy for EQT 0982 fines recovery tank	Halobutyl; EQT 0974; EQT-0982	VOC
7645098	2009	2166-V1	exceeded 2009 annual n-hexane permitted limits by 0.28 tpy for EQT0974	Halobutyl; EQT-0974	n-hexane
7645098	2009	2166-V1	exceeded 2009 annual n-hexane permitted limits by 2.65 tpy for EQT-0982	Halobutyl; EQT-0982	n-hexane
6654495	2009	2390-V1	Flare #25 smoked for approx. 35 minutes due to an upset in a process unit.	Infrastructure; Flare #25	Not Available
6654495	2009	2390-V1	Flare #65 smoked for approx. 34 minutes due to an upset in a process unit.	Infrastructure; Flare #25	Not Available
6654495	2009	2390-V1	Flare #10 smoked for approx. 28 minutes due to an upset in a process unit.	Infrastructure; Flare #25	Not Available

Doc ID	Incident Date	Permit No	Reported Details	Source Point/ Unit	Chemical Emitted (where available)
6654495	2009	2390-V1	open drain valve on distance piece of a compressor associated with BRCP Flare system	Infrastructure; BRCP Flare System	Not Available
6654495	2009	2396-V0	4 valves on Poly MCPU found on delay of repair list dated 2005. Had been shut down from 4/28/08-5/2/08 for major turnaround. Monitored on 5/6/09 found to be leaking. First attempt to repair 5/11/09 was unsuccessful. Adjusted by an instrument technician 5/12/09.	POLY/No.5 Light Ends; Poly MCPU	Not Available
6654495	2009	2031-V7	certified compression ignition engine over 500 HP brought onsite for 105 days without emission reduction equipment. Was used to replace EIQ# S-109 but had higher HP than listed in the permit.	Maintrain Ethylene Production; replacement certified compression ignition engine	Not Available
6654495	2009	2166-V1	Exceedances for secondary wastewater emissions at the Halobutyl Unit. Maximum flowrate exceeded 400 gpm for 9 hours over 5 days.	Halobutyl; EIQ M-57 in Halobutyl Unit	VOCs
6654495	2009	2367-V1	4 open ended lines	Co-Products; CPLA Unit	Not Available
6654495	2009	1924-V3	4 open ended lines	Isopropyl Alcohol; IPA Unit	Not Available
6654495	2009	2281-V1	1 open ended line	Methyl Ethyl Ketone/Sec-Butyl Alcohol; MEK Unit	Not Available
6654495	2009	2379-V0	1 open ended line	Neo Acids; OLA-2X Unit	Not Available

Doc ID	Incident Date	Permit No	Reported Details	Source Point/ Unit	Chemical Emitted (where available)
6654495	2009	2396-V0	2 open ended lines	POLY/No.5 Light Ends; Poly Unit	Not Available
6654495	2009	2361-V1	1 open ended line	Refinery Gas Recovery; RGR Unit	Not Available
6654495	2009	2376-V1	2 unpermitted engines	VISTALON®	Not Available
6654495	2009	2390-V1	Unpermitted emergency generator	Infrastructure	Not Available
6654495	2009	2166-V1	Exceedances for secondary wastewater emissions at the Halobutyl Unit. Maximum hourly n-hexane emissions exceeded permitted emissions for a total of 9 hours on 4 days.	Halobutyl; EIQ M-57 in Halobutyl Unit	n-hexane
6654495	2009	2390-V1	permit limits exceeded	Infrastructure; Flare Cap Emissions Point M-1000	2,2,4-Trimethylpentane
6654495	2009	2390-V1	permit limits exceeded	Infrastructure; Flare Cap Emissions Point M-1000	Acetonitrile
6654495	2009	2390-V1	permit limits exceeded	Infrastructure; Flare Cap Emissions Point M-1000	Biphenyl
6654495	2009	2390-V1	permit limits exceeded	Infrastructure; Flare Cap Emissions Point M-1000	Cumene

Doc ID	Incident Date	Permit No	Reported Details	Source Point/ Unit	Chemical Emitted (where available)
6654495	2009	2390-V1	permit limits exceeded	Infrastructure; Flare Cap Emissions Point M- 1000	Dimethylforma- mide
6654495	2009	2390-V1	permit limits exceeded	Infrastructure; Flare Cap Emissions Point M- 1000	Ethylene Glycol
6654495	2009	2390-V1	permit limits exceeded	Infrastructure; Flare Cap Emissions Point M- 1000	Methanol
6654495	2009	2390-V1	permit limits exceeded	Infrastructure; Flare Cap Emissions Point M- 1000	Methyl Ethyl Ketone
6654495	2009	2390-V1	permit limits exceeded	Infrastructure; Flare Cap Emissions Point M- 1000	Methyl Isobutyl Ketone
6654495	2009	2390-V1	permit limits exceeded	Infrastructure; Flare Cap Emissions Point M- 1000	Methyl Tert-Butyl Ether
6654495	2009	2390-V1	permit limits exceeded	Infrastructure; Flare Cap Emissions Point M- 1000	N-Butyl Alcohol, Phenol
6654495	2009	2390-V1	permit limits exceeded	Infrastructure; Flare Cap Emissions Point M- 1000	Ammonia
6654495	2009	2390-V1	permit limits exceeded	Infrastructure; Flare Cap Emissions Point M- 1000	Sulfur Dioxide

TABLE 2

Doc ID	Report Date	Incident Date	Permit No	Incident	Reporting Violation
6654495	9/30/09	2/5/09	2031-V7	SACC "A" Furnace AF-01 EIQ #S-01 smoked for 25 minutes due to tube leak	No timely report filed
6654495	9/30/09	2/14/09	2031-V7	SACC "A" Furnace AF-01 EIQ #S-01 smoked for approx. 4 minutes due to a tube leak	No timely report filed
6654495	9/30/09	5/20/09	2031-V7	SACC "A" Furnace AF-01 EIQ #S-01 smoked for approx. 3 hours and 20 minutes due to a tube leak.	No timely report filed
6654495	9/30/09	5/20/09	2031-V7	SACC "G" Furnace GF-01 EIQ#S-07 smoked for approx. 9 minutes due to a tube leak.	No timely report filed
6654495	9/30/09	5/20/09	2379-V0	Furnace smoked for approx. 10 minutes due to a mechanical lag in oxygen supply.	No timely report filed
7645098	3/31/10	10/2/09	2031-V7	SACC "B" Furnace (Furnace BF-01, EIQ #S-02) exceeded 20% opacity, due to tube leak	No timely report filed
7645098	3/31/10	11/6/09	2031-V7	SACC "F" Furnace (Furnace FF-01, EIQ #S-06) exceeded 20% opacity, due to tube leak	No timely report filed
6654495	12/4/09	11/30/09	2012-V2	Turbine Generator lost NOx suppression steam due to drop in temperature; caused a 10 minute exceedance of NOx concentration in the exhaust (approx. 4.5 lbs of excess NOx released)	No timely report filed

Doc ID	Report Date	Incident Date	Permit No	Incident	Reporting Violation
7645098	3/31/10	12/5/09	2365-V2	vent gas from Towers T-710 and T-740 vented to the atmosphere; required to be vented to furnace F-635; failure to vent streams to furnace is a violation.	No timely report filed
8244292, 8208292, 8263794	11/16/11	11/9/2011-11/19/2011	2031-V6	unauthorized emission of VOCs from KC-01 Thermowell	Insufficient information provided to identify applicable permit requirements
8244292, 8208292, 8263794	11/16/11	11/9/2011-11/19/2011	2031-V6	unauthorized emission of Benzene from KC-01 Thermowell	Insufficient information provided to identify applicable permit requirements
8244292, 8208292, 8263794	11/16/11	11/9/2011-11/19/2011	2031-V6	unauthorized emission of Ethylene from KC-01 Thermowell	Insufficient information provided to identify applicable permit requirements
8244292, 8208292, 8263794	11/16/11	11/9/2011-11/19/2011	2031-V6	unauthorized emission of Propylene from KC-01 Thermowell	Insufficient information provided to identify applicable permit requirements
8244292, 8208292, 8263794	11/16/11	11/9/2011-11/19/2011	2031-V6	unauthorized emission of Isoprene from KC-01 Thermowell	Insufficient information provided to identify applicable permit requirements
8244292, 8208292, 8263794	11/16/11	11/9/2011-11/19/2011	2031-V6	unauthorized emission of Nitrogen Oxide from KC-01 Thermowell	Insufficient information provided to identify applicable permit requirements
8244292, 8208292, 8263794	11/16/11	11/9/2011-11/19/2011	2031-V6	unauthorized emission of Sulfur Dioxide from KC-01 Thermowell	Insufficient information provided to identify applicable permit requirements
8244292, 8208292, 8263794	11/16/11	11/9/2011-11/19/2011	2031-V6	unauthorized emission of 1,3 Butadiene from KC-01 Thermowell	Insufficient information provided to identify applicable permit requirements

Doc ID	Report Date	Incident Date	Permit No	Incident	Reporting Violation
6104233	11/18/09	11/18/09	Not available	unauthorized emissions, pressure vapor release on storage tank	Insufficient information provided; failure to follow up on initial incident report
6636775	11/18/09	11/18/09	Not available	unauthorized emissions, pressure vapor vent release on storage tank	Insufficient information provided; failure to follow up on initial incident report
6168706	1/10/10	1/10/10	Not available	unauthorized emissions, HCE vacuum jet went positive	Insufficient information provided; failure to follow up on initial incident report
6668727	1/15/10	1/15/10	Not available	unauthorized emissions, starting maintain ethylene unit	Insufficient information provided; failure to follow up on initial incident report
1537976	3/16/10	3/16/10	Not available	unauthorized emissions, compressor tripped, extra gas in flare system, some of product uncombusted, close to RQ on sulfur dioxide	Insufficient information provided; failure to follow up on initial incident report
1537994	4/22/10	4/22/10	Not available	unauthorized emissions, DIPLA Unit, Cooling GFLA; heat exchanger leaking product into cooling tower water system, greater than 1000 VOC	Insufficient information provided; failure to follow up on initial incident report
1538058	4/26/10	4/26/10	Not available	unauthorized emissions, equipment failure, flaring, unknown gas	Insufficient information provided; failure to follow up on initial incident report

TABLE 3

Doc ID	Incident Date	Source	Pollutant	Release (lbs)	Permit No
8085368	3/18/09	s09-0788 HCE compressor	Benzene	69	Not available
6359778	3/18/09	Not available	Total	121	Not available
6359808	3/19/09	DSLA unit	1,3 Butadiene	10	Not available
6359808	3/19/09	DSLA unit	Total	320	Not available
8085362	3/29/09	s09-0938 gasket on E506B exchanger	Benzene	44	2299-V4
8085362	3/29/09	s09-0938 gasket on E506B exchanger	Toluene	29	2299-V4
6364673	4/6/09	Not available	Propylene	3470	Not available
6364673	4/6/09	Not available	Flammable Vapors	13830	Not available
6364673	4/6/09	Not available	Ethylene	2348	Not available
6470739	6/20/09	Isopropyl Alcohol	Benzene	120	1924-V3
6499151	7/14/09	Aromatics	Benzene	30	2299-V4
6547929	8/27/09	Refinery Gas Recovery	Propylene	158	2361-V1
6076999	10/12/09	Phthalic Anhydride	Hydrogen Sulfide	230	1200-V2
6089709	11/6/09	Hydrocarbon Emissions (HCE) compressor C-500B	Benzene	17	2299-V4
6760996	3/5/10	EPLA unit	Propylene	2421834	2031-V6
6760996	3/5/10	EPLA unit	Flammable Vapors	2562647	2031-V6
6760996	3/5/10	EPLA unit	VOCs	141454	2031-V6
6760996	3/5/10	EPLA unit	Ethylene	716	2031-V6
8114220	1/10/10	vacuum jet	Benzene	139	Not available
7744102	1/16/10	Not available	Flammable Vapors	6201	Not available
7744102	1/16/10	Not available	VOCs	6201	Not available
6667786	1/29/10	Aromatics	Benzene	31	2299-V4
4122543	5/3/10	cooling tower #33, exchanger E-18X	Propylene	7258	2396-V0
4122543	5/3/10	cooling tower #33, exchanger E-18X	VOCs	6678	2396-V0
7727644	5/23/10	MEK unit; in SCLA unit	Flammable Vapors	412	Not available

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4121842	5/24/10	POLY/ No.5 Light Ends	Flammable Vapors	2000	2396-V0
8085354	7/8/10	Halobutyl Unit flare	Flammable Vapors	1809	2166-V1
8085354	7/8/10	Halobutyl Unit flare	Propylene	329	2166-V1
6172610	6/10/10	Propylene refrigeration system	Propylene	1260	2361-V1
6172610	6/10/10	Propylene refrigeration system	Flammable Vapors	1340	2361-V1
6596979	6/20/10	Not available	phthalic antride	1606	Not available
6786415	7/19/10	Not available	Propylene	480	Not available
6785771	7/25/10	Halobutyl	Hexane	225860	2166-V1
7295542	7/29/10	Halobutyl	Flammable Vapors	1871	2166-V1
7295542	7/29/10	Halobutyl	Ethylene	1873	2166-V1
7680803	9/10/10	Olefins Area	Benzene	209	Not available
7680803	9/10/10	Olefins Area	Propylene	819	Not available
7680803	9/10/10	Olefins Area	Ethylene	1052	Not available
7680803	9/10/10	Olefins Area	Butadiene	Not available	Not available
7680803	9/10/10	Olefins Area	Sulfur Dioxide	8726	Not available
7680803	9/10/10	Olefins Area	Nitrogen Oxide	1099	Not available
7701868	10/3/10	Refinery Gas Recovery; compressor piping	Propylene	278	2361-V1
7718937	10/13/10	Maintrain Ethylene Production Unit; HC-01 compressor	HRVOCs	107	2031-V6
7754740	10/16/10	Isopropyl Alcohol Unit	Propylene	366	1924-V3
7935501	10/21/10	Bela 5 Unit	1,3 Butadiene	20	2367-V0
7788707	12/1/10	Refinery Gas Recovery; Ethylene Unit	Ethylene	7346	2361-V1
7788707	12/1/10	Refinery Gas Recovery; Ethylene Unit	Nitrogen Oxide	2663	2361-V1
8029629	12/8/10	Aromatics	Benzene	63	2299-V4
7798091	12/29/10	Maintrain Ethylene Production Unit	Benzene	16	2031-V6
7798091	12/29/10	Maintrain Ethylene Production Unit	Propylene	Not available	2031-V6

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7798091	12/29/10	Maintrain Ethylene Production Unit	1,3 Butadiene	13	2031-V6
7798091	12/29/10	Maintrain Ethylene Production Unit	Ethylene	304	2031-V6
7798091	12/29/10	Maintrain Ethylene Production Unit	Nitrous Oxide	Not available	2031-V6
7665023	6/27/10; 6/28/10	Not available	Flammable Vapors	1807	Not available
7873671	2/9/2011- 2/10/2011	BAC-01	1,3 Butadiene	121	2367-V0
7873669	2/25/2011- 2/26/2011	BAC-01	1,3 Butadiene	356	2367-V0
7924686	3/19/2011- 3/20/2011	EPLA-S	Propylene	2218	2361-V1
7924686	3/19/2011- 3/20/2011	EPLA-S	Ethylene	1282	2361-V1
7924688	4/13/11	RT-03	Propylene	4619	2361-V1
7924688	4/13/11	RT-03	Ethylene	3414	2361-V1
7924688	4/13/11	RT-03	Flammable Vapor	19903	2361-V1
8181684	7/3/11	EPLA-W	Propylene	1181	2031-V6
8244292, 8208292, 8263794	11/9/2011- 11/19/2011	Maintrain Ethylene Production Unit; KC-01 Thermowell	Ethylene	479	2031-V6
8244292, 8208292, 8263794	11/9/2011- 11/19/2011	Maintrain Ethylene Production Unit; KC-01 Thermowell	Ethane	157	2031-V6
8244292, 8208292, 8263794	11/9/2011- 11/19/2011	Maintrain Ethylene Production Unit; KC-01 Thermowell	Propylene	146	2031-V6
8244292, 8208292, 8263794	11/9/2011- 11/19/2011	Maintrain Ethylene Production Unit; KC-01 Thermowell	1,3 Butadiene	32	2031-V6
8244292, 8208292, 8263794	11/9/2011- 11/19/2011	Maintrain Ethylene Production Unit; KC-01 Thermowell	HRVOCs	1094	2031-V6
8244709, 8207350	11/11/11	EPLA-W, KD-14; (in connection with 11/9/2011 incident)	HRVOCs	108/day	2031-V6
8346105, 8398901	3/20/12	HC-01, EPLA-W	Ethylene	271.9	2031-V6

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8503388, 8530126	6/21/2012-7/13/2012	EPLA - W, MKC-02; (in combination with 6/14/2012 incident)	Propylene	93.6	2031-V8
8503388, 8530126, 8581260	6/22/12	EPLA - S; (in combination with 6/14/2012 incident)	Propylene	Not available	2031-V8
8569896	7/30/12	MkC-02, EPLA-W	Flammable Vapor	2073.4	2031-V8
8569896, 8530120	7/30/12	MkC-02, EPLA-W	Propylene	2073.4	2031-V8
8642907	11/30/2012-12/2/2012	RLA-1, C-571	Methylchloride	438	2166-V2
8642907	11/30/2012-12/2/2012	RLA-1, C-571	Hydrochloric Acid	62480	2166-V2
8642895	12/5/12	EPLA-W, KC-01	Ethylene	464.1	2031-V8
8642895	12/5/12	EPLA-W, KC-01	Propylene	109.4	2031-V8
8642895	12/5/12	EPLA-W, KC-01	1,3-Butadiene	18.8	2031-V8
8660528	12/11/12	RGR OLA-1X, EPLA-S	Ethylene	122	2361-V2
8660528	12/11/12	OLA-1X, MC-01	Flammable Vapors	5817	2361-V2
8660528	12/11/12	OLA-1X, MC-01	Propylene	5506	2361-V2
8684555	1/1/2013-1/3/2013	UE-07 to GFLA-3	Propylene	64179	2361-V2
8709523	1/12/13	IPA	Propylene	203	1924-V4
8695240	1/15/13	EPLA-S	Flammable Vapors	37820	2361-V1
8695240	1/15/13	EPLA-S	Propylene	35590	2361-V1
8775939	11/9/12	OLA-2X gas turbine, control valve servo actuator	VOCs	12,208	2031-V8
8775940	11/9/12	OLA-2X gas turbine, control valve servo actuator	Benzene	819	2031-V9
8775941	11/9/12	OLA-2X gas turbine, control valve servo actuator	Ethylene	3,572	2031-V10
8775942	11/9/12	OLA-2X gas turbine, control valve servo actuator	Propylene	1,423	2031-V11
8775943	11/9/12	OLA-2X gas turbine, control valve servo actuator	Isoprene	399	2031-V12
8775944	11/9/12	OLA-2X gas turbine, control valve servo actuator	Nitrogen Oxide	3,938	2031-V13

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8775945	11/9/12	OLA-2X gas turbine, control valve servo actuator	Sulfur Dioxide	28,986	2031-V14
8775946	11/9/12	OLA-2X gas turbine, control valve servo actuator	1,3 Butadiene	931	2031-V15