

February 18, 2020

Via Hand Delivery

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



Re: Letter of Notification  
Unauthorized Discharge Report  
State Police Incident #20-00569  
Agency Interest Number: 2638

Dear Sir or Madam:

This letter is formal written notification (the "Seven Day Letter") concerning the incident that occurred at the ExxonMobil Baton Rouge Refinery (BRRF) on February 11, 2020. By way of brief summary, and as detailed in the attached Unauthorized Discharge Notification Report, the reportable quantities for certain substances were exceeded as a result of this event. Most importantly, air quality monitoring in the community, as well as fence line monitoring during and after the fire all showed results below the detection limit. This information demonstrates that although the reportable quantities of some materials were exceeded at the situs of the fire, the majority of the released material was combusted and therefore not detected off-site.

The incident began at approximately 11:16 p.m. with a release and subsequent combustion of hydrocarbons from an elevated pipe rack<sup>1</sup> in the ExxonMobil Baton Rouge Refinery. The wind direction was blowing from the east to the west at approximately 8 mph. Approximately 75 trained ExxonMobil volunteer fire team members responded to the fire<sup>2</sup>. These responders were able to contain the fire within the immediate area of the elevated pipe rack within minutes. The fire was completely extinguished at approximately 5:45 a.m. on Wednesday, February 12th. There were no injuries associated with the incident. Air quality monitoring was conducted during the event by Baton Rouge Fire Department HAZMAT, Louisiana Department of Environmental Quality and ExxonMobil with all results below detection limits.<sup>3</sup>

For your further information here is a summary timeline of initial activities:

- 11:16 p.m. - Discovery of combustion event
- 11:18 p.m. - ExxonMobil fire team called
- 11:23 p.m. - First ExxonMobil fixed high volume water spray was applied to the fire
- 11:30 p.m. - ExxonMobil Emergency Responders conduct air monitoring of "hot zone"<sup>4</sup> around fire

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<sup>1</sup> An elevated pipe rack consists of a series of structural steel supports that run along the length of the overhead pipe system.

<sup>2</sup> The ExxonMobil Baton Rouge Complex has its own trained emergency response and fire team.

<sup>3</sup> During the fire, ExxonMobil took 126 real-time readings of fence line air quality monitoring.

<sup>4</sup> The hot zone sets a safe perimeter allowing the ExxonMobil fire team to get as close to the fire as safely possible. Air quality monitoring is a part of establishing the hot zone.

- 11:42 p.m. - Call to Baton Rouge Fire Department Public Information Officer
- 11:59 p.m. - ExxonMobil made required notification to the Louisiana State Police
- 12:11 a.m. - Baton Rouge Fire Department Hazmat air quality monitoring began

As detailed in the Unauthorized Discharge Notification Report, the reportable quantities for flammable vapors, benzene, 1,3 butadiene, sulfur dioxide, sulfuric acid, and >1 barrel of oil to soil (contained on-site) were exceeded as a result of this event. After further technical evaluation, the reportable quantity for hydrogen sulfide was not exceeded during this event.

The initial notification of released materials to the Louisiana State Police was a conservatively high estimate meant to be the most protective of the general public before actual quantities were calculated. The purpose of this Seven Day Report is to provide updated information as more data is available.

An investigation is being conducted to determine the root cause of the release; an update of which will be communicated in a 60 day follow-up letter.

If you have any questions regarding this notification, please contact me at 540-0277.

Sincerely,



D. Keith Andrepont  
Section Supervisor  
Environmental Regulatory Compliance Programs

ENV 1000

KGC

cc: Local Emergency Planning Committee  
State Police, HAZMAT Unit  
April Baiamonte, LDEQ

Certified Mail No.: 7017 0530 0000 6715 2327  
Certified Mail No.: 7017 0530 0000 6715 2334

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**Louisiana Department of Environmental Quality  
Unauthorized Discharge Notification Report (LAC 33:I.3925)**

**1. Company Name:** ExxonMobil Refining & Supply Company  
**Physical Address:** 4045 Scenic Highway  
Baton Rouge, LA 70805  
**Mailing Address:** P.O. Box 551  
Baton Rouge, LA 70821  
**Contact Name:** D. Keith Andrepont  
**Telephone Number:** 225-540-0277

**2. Date and Time of Verbal Notification:** February 11, 2020 at 11:59 p.m.  
**Official Contacted:** Jada Johnson  
**Officials Making Notifications:** K.Chamupathi  
**Site Identification:** Baton Rouge Refinery

**3. Date and Time Incident Started:** February 11, 2020 at 11:16 p.m.  
**Date and Time Incident Ended<sup>1</sup>:** February 12, 2020 at 5:45 a.m.  
**Duration:** 6 hours and 29 minutes

**4. Unauthorized Discharge Description and Root Cause:**

On February 11, 2020 at approximately 11:16 p.m., a release and subsequent combustion of hydrocarbons from an elevated pipe rack in the ExxonMobil Baton Rouge Refinery occurred. Approximately 75 trained ExxonMobil volunteer fire team members responded to the fire. These responders were able to contain the fire within the immediate area of the elevated pipe rack within minutes. The fire was completely extinguished at approximately 5:45 a.m. on Wednesday, February 12<sup>th</sup>. There were no injuries associated with the incident. Air quality monitoring was conducted during the event by Baton Rouge Fire Department HAZMAT, Louisiana Department of Environmental Quality and ExxonMobil with all results below detection limits. An investigation is being conducted to determine the root cause of the release; the results will be communicated in the 60 day follow up letter.

As a result of this incident, the reportable quantities for benzene, 1,3-Butadiene, flammable vapor, sulfur dioxide, sulfuric acid, and > 1 barrel of oil to soil (contained on-site) were exceeded. After further evaluation, the reportable quantity for hydrogen sulfide was not exceeded during this event.

Weather conditions at the time of the release were as follows: 61 Deg F, with a 8 mph wind speed from the east to the west with no precipitation.

Off-site Protective Action: This incident did not result in any off-site road closures, shelter-in-place, or evacuation.

a. Permit Number	b. Pollutant Released	c. Permit Limit	d. Limit Exceeded
Not applicable			

<sup>1</sup>Fire was extinguished at 5:45AM, additional minor liquid loss of containment occur as pipes are repaired/replaced

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**5. Specific Pollutants Emitted and Amount Released:**

**Specific Pollutants Emitted and Amount Released Based on Engineering Calculations**

Compound	CAS Number	Physical State	Quantity (lbs)	State Police RQ (lbs)	DEQ RQ (lbs)	NRC RQ (lbs)	U.S. DOT Hazard/EHS
Benzene	71-43-2	Vapor	33	10	10	10	No
1,3-Butadiene	106-99-0	Vapor	2681	10	10	10	No
Flammable Vapor	-	Vapor	62,093	1000	1000	-	No
Sulfur Dioxide	7446-09-5	Vapor	13,162	500	500	-	Yes
Sulfuric Acid	7664-93-9	Liquid	35,290	1000	1000	1000	Yes
Oil	-	Liquid	5 BBL	N/A	1 bbl	-	No

**6. Disposition and Offsite Impacts:**

Disposition: Air / Soil (all material released to soil was contained on-site)

**7. Remedial Action Taken:** Approximately 75 trained ExxonMobil volunteer fire team members responded to the fire. These responders were able to contain the fire within the immediate area of the elevated pipe rack within minutes utilizing water suppression. The fire was completely extinguished at approximately 5:45 a.m. on Wednesday, February 12th.

**8. Specific Actions Taken and/or Planned to Prevent Recurrence:** An investigation is ongoing and further details will be provided in the 60 day follow up letter.

**9. Site/Facility Permit:** The facility involved in the unauthorized discharge is permitted per applicable environmental regulations. The release event did not occur through an existing point source or outfall and is considered an unauthorized discharge.

**10. Reporting Party Status:** Owner/Operator.

**11. Discharges to the Ground or Groundwater:** Sulfuric acid and oil were contained on-site.

**12. Agencies Notified:**

Agency	Official Notified	Time	Date	Incident #
State Police/DEQ	Jada Johnson	11:59 p.m.	02/11/2020	20-00569
LEPC	Tiwysa Weatherspoon	12:25 a.m.	02/12/2020	--
NRC	Antiba Upchurch	1:28 a.m.	02/12/2020	1271029
State Police/DEQ	Jennifer Erwin	6:30 a.m.	02/12/2020	20-00569
LEPC	Chelsea Klein	6:35 a.m.	02/12/2020	--
State Police/DEQ	Jennifer Erwin	6:48 a.m.	02/12/2020	20-00569
LEPC	Chelsea Klein	6:52 a.m.	02/12/2020	--
State Police/DEQ	Operator Monroe	8:02 a.m.	02/12/2020	20-00569
LEPC	Chelsea Klein	8:06 a.m.	02/12/2020	--
State Police/DEQ	Operator Monroe	11:15 a.m.	02/12/2020	20-00569
LEPC	Chelsea Klein	11:22 a.m.	02/12/2020	--
State Police/DEQ	Operator Mandi	3:25 p.m.	02/12/2020	20-00569

<sup>1</sup>Fire was extinguished at 5:45AM, additional minor liquid loss of containment occur as pipes are repaired/replaced

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LEPC	Operator Jacob	3:27 p.m	02/12/2020	--
State Police/DEQ	Katelyn Smith	8:18 p.m	02/12/2020	20-00569
LEPC	Tiwysa Weatherspoon	8:20 p.m	02/12/2020	--
State Police/DEQ	Jennifer Erwin	8:30 a.m	02/13/2020	20-00569
LEPC	Operator Sherry	8:20 p.m	02/13/2020	--
State Police/DEQ	Amanda McGrath	11:17 a.m	02/13/2020	20-00569
LEPC	Jada Kowal	11:19 a.m	02/13/2020	--
State Police/DEQ	Katelyn Smith	8:18 p.m	02/13/2020	20-00569
LEPC	Operator Sherry	8:24 p.m	02/13/2020	--
State Police/DEQ	Jennifer Erwin	9:28 a.m	02/14/2020	20-00569
State Police/DEQ	Katelyn Smith	6:33 p.m	02/14/2020	20-00569
State Police/DEQ	Operator Thompson	9:37 a.m	02/15/2020	20-00569
State Police/DEQ	Operator Ogunnaike	10:00 p.m	02/15/2020	20-00569
State Police/DEQ	Operator Lewis	11:16 a.m	02/16/2020	20-00569
State Police/DEQ	Jada Johnson	9:25 p.m	02/16/2020	20-00569
State Police/DEQ	Jennifer Erwin	9:13 a.m	02/17/2020	20-00569
State Police/DEQ	Operator Haley	9:03 p.m.	02/17/2020	20-00569
State Police/DEQ	Jennifer Erwin	12:11 p.m.	02/18/2020	20-00569

**13. Other Responsible Parties:** None

**14. Was the Release Preventable**      Yes      No      **Undetermined**

**If No, Explain Why the Release Was Not Preventable:**

Pending investigation results.

**15. Extent of injuries:** There were no reported injuries as a result of the unauthorized discharge.

**16. Recovered Material Information:** Material will be managed in accordance with all applicable solid waste regulations.

<sup>1</sup>Fire was extinguished at 5:45AM, additional minor liquid loss of containment occur as pipes are repaired/replaced