Occupational Safety and Health Administration Inspection Date(s): 06/13/2013 - 06/13/2013

Inspection Number: 915682

Issuance Date: 12/11/2013



Citation and Notification of Penalty

Company Name: Williams Olefins, LLC

Inspection Site: 5205 Hwy 3115, Geismar, LA 70734

Citation 1 Item 1 Type of Violation: Serious

29 CFR 1910.119(d)(1)(vii): The employer did not describe the hazardous effects of inadvertent mixing different materials that could foreseeably occur.

The employer does not describe in the process safety information the hazardous effects of inadvertently mixing hot water with propylene which may occur due to a rupture or failure of the reboilers (EA 425 A and/or EA 425 B) tubes or leaking of the process inflow valve. This violation was documented on or about July 14, 2013.

Pursuant to 29 CFR 1903.19, within 10 calendar days of the abatement date, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that process safety information contains the potential effects of chemical mixtures within the process.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: Proposed Penalty:

12/21/2013 \$7000.00

Occupational Safety and Health Administration Inspection Date(s): 06/13/2013 - 06/13/2013

Inspection Number: 915682

Issuance Date: 12/11/2013



Citation and Notification of Penalty

Company Name: Williams Olefins, LLC

Inspection Site: 5205 Hwy 3115, Geismar, LA 70734

Citation 1 Item 2 Type of Violation: **Serious**

29 CFR 1910.119(d)(3)(ii): The employer did not document that equipment complies with recognized and generally accepted good engineering practices.

- a) The employer does not ensure compliance with recognized and generally accepted good engineering practices (RAGAGEP-ASME BPVC Section 8, Div 1, UG-125 (a)1-3)), specifically operating and maintaining process vessels without overpressure protection. EA-425B was exposed to process conditions through the introduction of quench water without an open relief path or pressure relief device. This violation was documented on or about July 3, 2013 at the Williams Olefins Geismar, Louisiana Facility.
- b) The employer does not ensure compliance with recognized and generally accepted good engineering practices (RAGAGEP-API 521-paragraph 2.3.15) in that EA-425B did not have a pathway to relief in the event of exposure to fire. This violation was documented on July 3, 2013 at the Williams Olefins Geismar, Louisiana Facility.

Pursuant to 29 C.F.R. 1903.19, within (10) calendar days of the abatement date, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that the hazards of the process are addressed and comply with recognized and generally accepted good engineering practices.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: Proposed Penalty:

12/21/2013 \$7000.00

Occupational Safety and Health Administration Inspection Date(s): 06/13/2013 - 06/13/2013

Inspection Number: 915682

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Citation and Notification of Penalty

Company Name: Williams Olefins, LLC

Inspection Site: 5205 Hwy 3115, Geismar, LA 70734

Citation 1 Item 3 Type of Violation: Serious

29 CFR 1910.119(e)(3)(i): The employer did not ensure that the process hazard analysis considered the hazards of the process;

The employer did not ensure that the process hazard analysis was appropriate to the complexity of the process which identify, evaluate, and control the hazards involved in the process. This violation was documented on or about June 21, 2013, when the employer's process hazard analysis (July 1996, July 2001, July 2006, and September 2011) for the propylene fractionation area did not address opening the quench water flow to a stand-by reboiler when shell side hydrocarbon residuals may exist through valve leakage.

Pursuant to 29 CFR 1903.19, within (10) calendar days of the abatement date, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that the process hazard analysis addresses all potential hazards of the process.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: Proposed Penalty:

12/21/2013 \$7000.00

Occupational Safety and Health Administration Inspection Date(s): 06/13/2013 - 06/13/2013

Inspection Number: 915682

Issuance Date: 12/11/2013



Citation and Notification of Penalty

Company Name: Williams Olefins, LLC

Inspection Site: 5205 Hwy 3115, Geismar, LA 70734

Citation 1 Item 4 Type of Violation: Serious

29 CFR 1910.119(g)(3): Training documentation. The employer did not prepare a record which contained the identity of the employee, the date of training, and the means used to verify that the employee understood the training.

The employer does not prepare a record containing the verification used to determine that the employee understood the training. This violation was documented on or about July 17, 2013 when the process safety training records did not contain a means of verification for three operator technicians.

Pursuant to 29 CFR 1903.19, within 10 calendar days of the abatement date, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that a means of training verification is utilized with the training program.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: Proposed Penalty:

12/21/2013 \$3000.00

Occupational Safety and Health Administration Inspection Date(s): 06/13/2013 - 06/13/2013

Inspection Number: 915682

Issuance Date: 12/11/2013



Citation and Notification of Penalty

Company Name: Williams Olefins, LLC

Inspection Site: 5205 Hwy 3115, Geismar, LA 70734

Citation 1 Item 5 Type of Violation: Serious

29 CFR 1910.119(o)(4): The employer did not promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected.

This violation was observed on or about June 13, 2013, where the 2013 Williams Olefins, LLC, Chemical Process Safety Management Compliance Audit (Bates# 5963-5977) was reviewed and it was determined that the employer failed to promptly correct 12 out of 32 recommendations (2010 Compliance Audit -Bates#5906-5962) such as but not limited to the following:

- A) Recommendation to modifying the alarm settings in the written operating procedures to reflect the minimum/maximum setting for alarms rather than current TDC setting for the alarms remains open.
- B) The current fixed equipment program does not address the inspection and thickness testing of small bore piping.
- C) No documentation that pipe hangars, supports and insulation were being inspected

These deficiencies are not being corrected in a timely manner.

Pursuant to 29 CFR 1903.19(d), within 10 calendar days of the date of the citation, the employer must submit documentation that it is in compliance with the standard, illustrating how the remaining findings/deficiencies will be corrected.

One method of abatement among others is to have a second party verify completion of all recommendations/corrections.

Occupational Safety and Health Administration Inspection Date(s): 06/13/2013 - 06/13/2013

Inspection Number: 915682

Issuance Date: 12/11/2013



Citation and Notification of Penalty

Company Name: Williams Olefins, LLC

Inspection Site: 5205 Hwy 3115, Geismar, LA 70734

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 12/21/2013

Proposed Penalty:

\$5000.00

Occupational Safety and Health Administration Inspection Date(s): 06/13/2013 - 06/13/2013

Inspection Number: 915682

Issuance Date: 12/11/2013



Citation and Notification of Penalty

Company Name: Williams Olefins, LLC

Inspection Site: 5205 Hwy 3115, Geismar, LA 70734

Citation 2 Item 1 Type of Violation: Willful

29 CFR 1910.119(f)(1): The employer did not develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information.

The employer does not ensure that written operating procedures provide clear instructions for safely conducting activities involved in the covered process. This violation occurred on or about June 13, 2013, and at times prior thereto when the employer failed to develop a clear, written procedure to change the service between reboilers EA-425A and EA-425B.

Pursuant to 29 CFR 1903.19(d), within 10 calendar days of the date of the citation, the employer must submit documentation showing that it is in compliance with the standard including developing a written procedure for switching the service between reboiler EA-425A and EA-425B.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

Proposed Penalty:

12/21/2013

\$70000.00

. Dorinda Folse

Occupational Safety and Health Administration 9100 Bluebonnet Centre Blvd. Suite 201

Baton Rouge, LA 70809

Phone: 225-298-5458 Fax: 225-298-5457



INVOICE / DEBT COLLECTION NOTICE

Company Name:

Williams Olefins, LLC

Inspection Site:

5205 Hwy 3115, Geismar, LA 70734

Issuance Date:

12/11/2013

Summary of Penalties for Inspection Number

915682

Citation 1, Serious

\$29000.00

Citation 2, Willful

\$70000.00

TOTAL PROPOSED PENALTIES

\$99000.00

To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to: "DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance. You can also make your payment electronically on www.pay.gov. On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type "OSHA" and click Go. From the results, click on OSHA Penalty Payment Form. The direct link is https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334. You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$50,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will cash the check or money order as if these restrictions or conditions do not exist.

If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to 2 times.

Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent charges, and administrative costs for the collection of delinquent penalty debts for violations of the Occupational Safety and Health Act.

<u>Interest</u>: Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent (1%). Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

<u>Delinquent Charges</u>: A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per annum will be assessed accruing from the date that the debt became delinquent.

Administrative Costs: Agencies of the Department of Labor are required to assess additional charges for the recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for demand letters sent in an attempt to collect the unpaid debt.

Dorinda Folse

Area Director

Date

12-10-13