



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 Ross Avenue  
Dallas, Texas 75202-2733

DEC 4 2014

CERTIFIED MAIL – RETURN RECEIPT REQUESTED: 7014 0150 0000 2453 3405

Mr. Bill Gibson  
Director EHS&T Audits  
Enterprise GC, LP  
1100 Louisiana  
Houston, Texas 77002

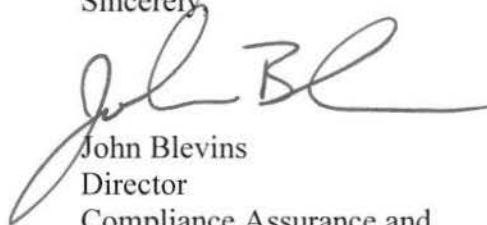
Re: Clean Air Act Section 114 Information Request

Dear Mr. Gibson:

Enclosed is an Information Request (Request) issued to Enterprise GC, LP under the authority of Section 114 of the Clean Air Act (CAA). The purpose of this Request is to obtain information regarding the fire that occurred on March 11, 2014, at the Shoup Plant located at 802 McKenzie Road, Corpus Christi, Texas 78410.

Please provide the information requested within thirty (30) days of your receipt of this letter to Tony Robledo at the above address. If you have any questions relating to this Request, please contact Tony Robledo, a member of my staff, at 214-665-8182.

Sincerely,



John Blevins  
Director  
Compliance Assurance and  
Enforcement Division

Enclosure

cc: Michael De La Cruz, TCEQ

## **Enclosure A**

### **Information Request Enterprise GC, LP**

The U.S. Environmental Protection Agency (EPA) Region 6 is issuing this request for information to Enterprise GC, LP pursuant to Section 114 of the Clean Air Act (CAA), 42 U.S.C. §7414 for the purpose of determining compliance with the CAA, including CAA section 112(r). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Compliance Assurance and Enforcement Division, EPA Region 6. This information request pertains to the Enterprise GC, LP Shoup Plant located in Corpus Christi, Texas.

You must submit all requested information under an authorized signature on the certification statement in Enclosure B, which provides:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for submitting false statements and information, including the possibility of fine and imprisonment for knowing violations.

We may use any information submitted in response to this request in an administrative, civil, or criminal action.

All information responsive to this Request should be sent to the following:

Tony Robledo (6RC-ER)  
U.S. EPA Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733

#### **I. Instructions**

1. If information or documentation not known or not available to you as of the date of submission of a response to this Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response, that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. There are significant penalties for submitting false information, including the possibility of fine or imprisonment.

Re: Information Request  
Enterprise GC, LP

2. For each document produced in response to this Request, indicate on the document, or in some other reasonable manner, the number of the question to which it responds. Please submit all information for each question in a logically sequenced, bound format.
3. Please provide a separate response to each question and subpart of a question set forth in this Request and precede each answer with the number of the question to which it corresponds.
4. In your response to each question, identify each person answering the question, including each person answering any subparts of the question, as well as each person consulted in the preparation of your response.
5. For each question, identify each document consulted, examined, or referred to in the preparation of the response or that contains information responsive to the question, and provide a true and correct copy of each such document if not provided in response to another specific question. Indicate on each document produced in response to this Request the number of question to which it corresponds.
6. Failure to submit requested information in accordance with statutory or regulatory requirements constitutes a violation of the CAA.

## **II. Confidential Business Information**

You must provide the information requested even if you consider it confidential information or trade secrets. You may assert a business confidentiality claim for part or all of the information requested, as described below and set forth in 40 C.F.R. Part 2, Subpart B. Information covered by such a claim will be disclosed by EPA only to the extent and only by the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no confidentiality claim accompanies the information when EPA receives it, the information may be made available to the public by the EPA without further notice to you. 40 C.F.R. § 2.203(a); see also 41 Fed. Reg. 36,902 (Sept. 1, 1976); 43 Fed. Reg. 4,000 (Dec. 18, 1985).

If you wish EPA to treat any information or response as confidential, you must advise EPA and comply with the following procedures. Place on or attach to the information at the time it is submitted to EPA a cover sheet, stamped or typed legend, or other suitable form of notice employing such language as trade secret, proprietary, or company confidential. You must clearly identify allegedly confidential portions of otherwise non-confidential documents and you may want to submit these separately to facilitate identification and handling by EPA. If you seek confidential treatment only until a certain date or until occurrence of a certain event, state this in your notice. Include an explanation of your claim that disclosure of the information would likely result in substantial harmful effects on your business' competitive position, referring to the applicable substantive criteria in 40 C.F.R. § 2.308. Specify the harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and substantial harmful effects. You must make a separate assertion of

Re: Information Request  
Enterprise GC, LP

confidentiality for each response and each record that you consider confidential. Submit a written index for each record for which you assert a claim of confidentiality that includes the following information:

1. Describe the response or document and nature of the information. For a document, include the name of the author(s), the date the document was issued, the summary title, and the names of the recipient(s).
2. Specify the portion of the response or document for which you assert a claim of confidentiality by reference to page numbers, paragraphs, and lines, or specify entire document.
3. Briefly identify the basis of your claim.

If you believe that facts and documents necessary to substantiate confidentiality are themselves confidential, please identify them as such so that EPA may maintain their confidentiality pursuant to 40 C.F.R. Part 2, Subpart B.

### **III. Definitions**

1. Unless specifically defined in this Request or in the CAA or its implementing regulations, all terms used in this Request will have their ordinary meaning.
2. The terms "document" or "documents" shall mean written documentation of any kind, including documentation solely in electronic form. It includes any document in the possession or control of the company or the possession or control of any person hired by the company. A copy of a document rather than the original may be provided
3. The term "Enterprise GC, LP" includes any officer, director, agent, or employee of Enterprise GC, LP, including any merged, consolidated, or acquired predecessor or parent, subsidiary, division, or affiliate thereof, and any related partnerships or limited partnerships.
4. The terms "you" or "yours" shall mean Enterprise GC, LP, as defined in Paragraph 3 above, including the company or corporation, its subsidiaries, division, affiliates, predecessors, successors, assigns, and its former and present officers, directors, agents, employees, representatives, attorneys, consultants, accountants and all other persons acting on its behalf.
5. The term "Facility" refers to the Enterprise GC, LP Shoup Plant located at McKenzie Road, Corpus Christi, Texas 78410.

6. Words in the masculine shall be construed as the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.

#### **IV. Information Requested**

With respect to the fire that occurred at the Facility on March 11, 2014 (the "Incident"):

- 1) Please describe the facility, including the purpose of the facility, what processes take place there, the equipment used, etc.
- 2) Describe the Inlet Gas Separator maintenance that was taking place on March 11, 2014.
- 3) Identify by name, company, position, and function who was performing that maintenance.
- 4) What substances were inside the Inlet Gas Separator on March 11, 2014?
- 5) Was the standard operating procedure (SOP) for cleaning the Inlet Gas Separator followed on March 10, 2014, and March 11, 2014? If not, then explain any deviation from the SOP.
- 6) If a contractor was performing work on the Inlet Gas Separator on March 11, 2014, then please explain how you provided oversight to ensure SOP and other safety requirements were followed by the contractor during the maintenance activities.
- 7) Please provide a detailed narrative describing the Incident that occurred on March 11, 2014.
- 8) Please provide a timeline of the maintenance activities on the Inlet Gas Separator, including the Incident and the responses to the Incident.
- 9) Did the water used to clean the inside of the vessel react with a substance inside the vessel or otherwise cause the Incident? If so, then please explain.
- 10) Please describe Procedure SHP-001. Please attach a copy. Does the Procedure require that all High Point Vent Valves be open when the vessel is flooded with water? If so, then were the Inlet Gas Separator High Point Vent Valves open on the vessel at issue in the Incident? If not, then why not? What was the impact of having the High Point Vent Valves remain closed during cleaning or flooding with water?

Re: Information Request  
Enterprise GC, LP

- 11) Who sprayed water into the vessel in response to the smoke? Did you have a representative managing the contractors at the time water was sprayed into the vessel in response to the smoke?
- 12) Is the Inlet Gas Separator part of a risk management plan covered process?
- 13) Please describe any injuries that resulted from the incident describing the extent of injury.
- 14) Please describe any property damage, on-site or off, that resulted from the Incident.
- 15) Are you undertaking an investigation or analysis into the cause of the Incident? If so, then please describe any conclusions that have resulted from the investigation or analysis.
- 16) Have you, or any other entity, performed a root cause analysis of the causes of the incident? If so, then please attach any draft or final copy of the root cause analysis currently in your possession or under your control.
- 17) What measures have you undertaken to prevent a recurrence of the Incident?

Re: Information Request  
Enterprise GC, LP

**Enclosure B**

Clean Air Act Section 114 Information Request  
Statement of Certification

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for submitting false statements and information, including the possibility of fine and imprisonment for knowing violations.

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Office or Title: \_\_\_\_\_

Date: \_\_\_\_\_