



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

October 15, 2012

CERTIFIED MAIL – RETURN RECEIPT REQUESTED: 7010 1060 0002 1872 6674

Mr. Michael P. Cook  
Chief Financial Officer, Chief Operating Officer  
Sun Drilling  
503 Main Street  
Belle Chasse, Louisiana 70037

Re: Clean Air Act Section 114 Information Request

Dear Mr. Cook:

Enclosed is an Information Request (Request) issued to Sun Drilling under the authority of Section 114 of the Clean Air Act (CAA). The purpose of this Request is to obtain information regarding the polymerization incident that occurred on August 17, 2012, at Sun Drilling's facility in Belle Chasse, Louisiana.

Please provide the information requested within three (3) working days of your receipt of this letter to Donald M. Smith at the above address. If you have any questions relating to this Request, please contact Mr. Smith, of my staff, at (214) 665-7270.

Sincerely,

A handwritten signature in black ink, appearing to read "John Blevins".

John Blevins  
Director  
Compliance Assurance and  
Enforcement Division

Enclosure

cc: Chris Piehler, Administrator  
Inspection Division  
Louisiana Department of Environmental Quality

Celena Cage, Administrator  
Enforcement Division  
Louisiana Department of Environmental Quality

## Enclosure A

### Information Request Sun Drilling

The U.S. Environmental Protection Agency (EPA) Region 6 is issuing this Information Request (Request) to Sun Drilling 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 Request pertains to Sun Drilling, 503 Main Street, Belle Chasse, Louisiana 70037.

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:

Donald M. Smith (6EN-AS)  
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.

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 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 "Sun Drilling" includes any officer, director, agent, or employee of Sun Drilling, 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 Sun Drilling, 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 Sun Drilling facility in Belle Chasse, Louisiana, where a polymerization incident occurred on August 17, 2012.

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. Questions**

1. With respect to the polymerization incident that occurred at the Facility on August 17, 2012 (the "Incident"):
  - a. Please identify any process chemicals or other hazardous substances released to air in connection with the Incident, the amount released, and the duration of the release.
  - b. What were the cause/s and contributing factors of the Incident? Please provide documentation supporting your answer, including any investigation reports and related documents.
  - c. What was the extent and duration of the explosion/fire associated with the Incident?
  - d. Please describe any property or equipment damage that resulted from the Incident.
  - e. Please describe any injuries attributed to the Incident.
  - f. What emergency response measures were taken to stop and/or to minimize hazards from the Incident?
  - g. Did you evacuate or issue a shelter in place order as a result of the Incident?
2. Did you perform a Process Hazard Analysis ("PHA") covering the process unit/s associated with the Incident before August 17, 2012? If so, please provide a copy of the PHA covering the process unit/s. If you have revised this part of the PHA since August 17, 2012, please describe the revisions and provide a copy of the revised PHA concerning the process unit/s.
3. Provide a brief Process Description for the process unit/s associated with the Incident on August 17, 2012. Please describe any revisions that have been made since August 17, 2012, to the Process Description.
4. Please identify, and provide a copy of, any industry standard, internal standard, or manufacturer's recommendations you followed with respect to the mechanical integrity of process equipment in the affected process unit/s associated with the Incident.

**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: \_\_\_\_\_