



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

February 1, 2012

CERTIFIED MAIL – RETURN RECEIPT REQUESTED: 7010 2780 0002 4357 3759

W. S. Stewart
Environmental Coordinator
ExxonMobil Refining and Supply Company
P.O. Box 3311
Beaumont, TX 77704-3311

Re: Consent Decree - United States of America, State of Illinois, State of Louisiana,
and the State of Montana v. Exxon Mobil Corporation and ExxonMobil Oil
Corporation – Refinery Flaring Reports – Beaumont Refinery, Beaumont, Texas

Dear Mr. Stewart:

The U.S. Environmental Protection Agency (EPA) received reports dated March 17, 2011 and April 5, 2011, regarding acid gas flaring incidents at the ExxonMobil Beaumont Refinery located in Beaumont, Texas. Enclosed is a consolidated response outlining EPA's determination on the flaring incidents, as well as a table summarizing the reported incidents and any stipulated penalties that have been assessed. The total stipulated penalty amount assessed for the incidents referenced in the enclosure is \$3,075 and should be paid in accordance with Paragraph 214 of the consent decree. To expedite the processing of the payment of stipulated penalties, please clearly identify the incident date and amount of the penalty both on the check, if paying by check, and in the letter accompanying payment by check or wire transfer. Please also send a copy of the letter accompanying the payment to braby.sharon@epa.gov.

If you have any questions regarding this matter, please contact Clint Rachal of my staff at (214) 665-6474.

Sincerely,

A handwritten signature in black ink that reads "John Blevins".

John Blevins

Director

Compliance Assurance and
Enforcement Division

cc (electronically): Sharon Braby, U.S. EPA, Region 6
Pam Elder-Schweers, U.S. EPA, Region 6
Clare Sullivan, Matrix Engineering
Michelle Angel, U.S. EPA/Cincinnati Finance Center

Re: ExxonMobil Oil – Beaumont Refinery
Flaring Report

cc: Bruce Gelber, Chief
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice

Phillip Brooks, Director
Air Enforcement Division
Office of Regulatory Enforcement
U.S. Environmental Protection Agency

Clare Sullivan
Matrix New World Engineering, Inc.

Richard Hyde, Deputy Director
Office of Compliance & Enforcement
Texas Commission on Environmental Quality

Jack Balagia
Assistant General Counsel, Litigation
Law Department
Exxon Mobil Corporation

Mike McWilliams
Downstream Environment and Global Compliance Manager
Exxon Mobil Corporation

USEPA Region 6 Consolidated Flaring Report Response
ExxonMobil – Beaumont Refinery
Acid Gas Flaring Events
2/2/2011 and 2/23/2011

The following table provides a summary of the incidents reported and any stipulated penalties that have been assessed:

Incident Date	Report Date	Incident Type	Applicable CD Paragraph	Tons Released	Penalty Amount Assessed
2/02/2011	3/17/2011	AG	85.a.	0.8	\$0
2/23/2011	4/05/2011	AG	83.iii.	4.1	\$3,075

February 2, 2011 – On March 17, 2011, EMBR reported a February 2, 2011 acid gas flaring incident (AGI). The report stated that the flaring incident lasted for approximately 0.72 hour and resulted in the release of 0.8 tons of SO₂.

In the incident report, EMBR reported that failures of several pieces of equipment during a cold weather event led to hydrocarbon carryover in the Diethanolamine (DEA) System leading to the shutdown of Sulfur Recovery Unit 1 (SRU1) and the subsequent flaring.

EMBR identified the root cause of the incident as inadequate freeze protection. Corrective actions included evaluating and upgrading winterization of instruments associated with the Refinery DEA System; adding additional alarms to identify future occurrences of faulty instrumentation; and, reviewing and implementing alarms and Real Time Advisor rules on DEA Absorbers as appropriate.

EPA has determined that the reported AGI was a first time occurrence of a root cause and assesses no penalty for the incident. EPA notes that this is the first AGI in a rolling 12-month period.

February 23, 2011 – On April 5, 2011, EMBR reported a February 23, 2011 AGI. The report stated that the flaring incident lasted for 9.2 hours and resulted in the release of 4.1 tons of SO₂.

In the incident report, EMBR reported that during the event the Coker Unit Wet Gas Compressor (WGC) suffered a trip due to the loss of the Intermediate Pump-Around section of the Combination Tower. The Fractionator Absorber then filled with the Coker Wild Naptha stream due to the loss of pressure on the Fractionator and carried over into the DEA System.

The root cause of the AGI was inadequate emergency procedures covering the trip on the WGC. The Coker Wild Naptha stream could have been routed to slop upon tripping the WGC preventing the flaring incident. To prevent recurrence of the root cause, EMBR committed to implementing revised emergency procedures to cover routing wild naptha stream to slop upon trip of the WGC.

EPA has determined that the reported AGI was due to failure of equipment that was due to a failure by EMBR to operate and maintain their equipment in a manner consistent with good engineering practice. Therefore, in accordance with Paragraph 83(iii) of the CD, EPA assesses a penalty of \$3,075. The penalty should be paid in accordance with Paragraph 165 of the CD. EPA notes that this is the second AGI in a rolling 12-month period.