

INCIDENT REPORT FORM

Received by: Cindy

Dispatch # 507-0851 Incident # T 94771

Date Reported: 3/20/07

Time Reported: 15:05

Spill Incident/Release  Citizen Complaint  Emergency?  Yes  No Drill?  Yes  No

CALLER INFORMATION: Citizen  Industry  Anonymous Complaint

Other (i.e. Coast Guard): \_\_\_\_\_

Name/Company: Scott Longon - Formosa Plastics

Title: \_\_\_\_\_

Address: Gulf States Rd. Baton Rouge

Is caller requesting a follow-up call? Yes  No

Date of Caller Contact: \_\_\_\_\_

Telephone No. 225-356-3341

Parish (of occurrence): East Baton Rouge

SITE INFORMATION:

Company Name/  
Alleged Violator: \_\_\_\_\_

Agency Interest # 288

Other: \_\_\_\_\_

Location Address: \_\_\_\_\_

Site is Active or Inactive: \_\_\_\_\_

Date of discharge if different from date report: disc. 3/19/07

Time discharge noticed: Began 11:10a

Ended \_\_\_\_\_

Media Affected: Air  Land  Surface Water  Ground Water  Other \_\_\_\_\_

If water affected, name of nearest water body (Basin/Subsegment): \_\_\_\_\_

If air affected, note wind direction and weather conditions (if provided): \_\_\_\_\_

DESCRIPTION OF RELEASE/SPILL/COMPLAINT:

Product/material release and quantity (reported): 2% caustic

Product/material released and quantity (actual): \_\_\_\_\_

Description of release/complaint: Potential groundwater impact - while performing maintenance work at the old VCMJ plant they found evidence of a historic release of caustic to groundwater.

How was spill contained? Offsite Impact? \_\_\_\_\_

How was spilled cleaned/remediated? \_\_\_\_\_

DIRECTIONS FOR REACHING THE SITE:

Investigator's Comments: \_\_\_\_\_

RECEIVED  
INVESTIGATED

MAR 21 2007

Region Assigned: CRO - Crain

Summary Report: Yes  No

Investigator Assigned: \_\_\_\_\_

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

Time: \_\_\_\_\_

Investigator's Signature: \_\_\_\_\_

Reviewer's Initials & Date: \_\_\_\_\_

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

Closed by: Site Visit

Telephone

Other: \_\_\_\_\_

## INCIDENT REPORT

Incident ID: 94771

Incident Description

**Incident Type:** Release/Spill, Miscellaneous  
**Incident Date:** MAR-19-07 11:10  
**Parish:** East Baton Rouge  
**Municipality:** Baton Rouge  
**Location:** Formosa PlasticsGulf States RdBaton Rouge  
**Lat/Lon:**  
**Basin/Segment:**  
**Substance(s):** Sodium Hydroxide 537-lb  
**Media Impacted:** Water/Soil  
**Incident Desc:** s07-0851Potential groundwater impact...jd

Incident Status

**Lead Investigator:** Mary David  
**Incident Region:** Capital  
**Incident Status:** Closed  
**Followup Status:** Closed  
**As Of:** JUL-30-2007 15:03

Incident Reporter

**Received By:** Robert ("Bob") Crain  
**Received Date:** MAR-20-2007 15:05  
**Dispatch #:** s07-0851  
**Reported By:** Scott Longon, Agency Interest Self Rept  
**Phone:** 225-356-3341  
**Reporter Title:**  
**Organization:** Formosa Plastics  
**Address:** Gulf States Rd  
  
**Municipality:** Baton Rouge  
**State:** LA  
**Zip Code:**  
**Comments:**

**Incident Source****Source Name:** Formosa Plastics Corp Louisiana - Baton Rouge Plant**Address:** N end of Gulf States Rd**Municipality:** Baton Rouge**State:** LA**Phone:** 2253563341**Parish:** East Baton Rouge**AI #:** 288**Related Permits:**

**Comments:** Discovered evidence of historic release of caustic to groundwater while performing maintenance work at old VCMI plant. mhd  
4/24/2007 written notification recd- update. Amount involved estimated at 537 lbs, below the RQ. Source of caustic contamination was determined to be from a leaking valve on an upstream caustic header system that drained to the storm sewer. Source isolated and contamination recovered. May be possible groundwater contamination. mhd



Formosa Plastics\*

Formosa Plastics Corporation, Louisiana  
P.O. Box 271  
Baton Rouge, LA 70821-0271  
Telephone: (225)-356-3341  
Fax: (225)-356-8611

April 24, 2007

CERTIFIED MAIL (7003 1010 0005 5100 6056) RETURN RECEIPT REQUESTED

Louisiana Department of Environmental Quality  
Post Office Box 4312  
Baton Rouge, LA 70809-4312  
ATTENTION: SURVEILLANCE DIVISION-SPOC

*507-0851  
T 94771  
Mary David  
CEO*

RE: Update Report to the Initial Written Report  
Formosa Plastics Corporation, Louisiana AI No. 288  
Groundwater Contamination Notification  
LAC 33:3919  
Section VII (HSWA Provisions)  
Post Closure Permit No. LAD041224932

RECEIVED

MAY 1 2007

DEQ  
Single Point of Contact

Dear Sir or Madam:

On March 26, 2007, FPC submitted a written notification to a March 20, 2007 telephone report of potential groundwater contamination, due to caustic soda, at the FPC facility. FPC submits this report to update the information provided in previous reports. A copy of the March 26, 2007 report is attached for your reference.

Based on FPC's further investigation, FPC amends its findings as reported in its March 26 report to include additional details as follows:

On March 15, 2007, FPC's contractor discovered contamination in the trench being excavated for the fire water line repair. The source of the high pH contamination (sodium hydroxide or caustic soda) appeared to be coming from the ground in the surrounding excavation area, but additional excavation was necessary to confirm this conjecture. The contamination in the trench area was recovered and neutralized. The area was blocked in and the job shut down. On March 19, upon resuming work on the fire water line repair, liquid contamination was again discovered.

Additional excavation was necessary to determine that the near-by storm water sewer line was leaking into the repair trench and further investigation was begun to determine the source of this. Even though the contents of this storm water sewer line is routinely collected and treated, caustic soda is not a normal constituent in this sewer. On March 23, 2007, the source of the caustic contamination was determined to be from a leaking valve on an upstream caustic header system which drained to this storm sewer. The source was isolated and the contamination was recovered as much as possible from the sewer system and trench.

The release calculation as attached, conservatively accounts for the caustic contamination from



April 24, 2007  
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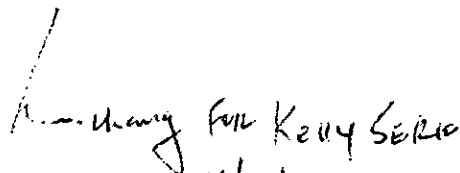
the initial discovery on March 15 and is estimated to be 537 lb. While this is not a reportable quantity (RQ) release (sodium hydroxide RQ = 1000 lb), FPC provides this notification of potential contamination to groundwater. The impact to groundwater appears to be localized with no known off-site impact.

As previously reported, as an immediate corrective action, FPC collected and pumped the potentially impacted liquids from the fire water repair trench for on-site recovery and neutralization. In addition, FPC has also replaced the leaking six-inch isolation valve and is in the process of repairing the leaking storm sewer line.

If you need additional information please contact Mr. Omer Wolff, Environmental and Safety Manager, at (225) 358-8511.

Sincerely,

**FORMOSA PLASTICS CORP., LA**

A handwritten signature in black ink that reads "Kelly Serio". The signature is written in a cursive style and is positioned above the typed name and title.

Kelly Serio 4/26/2007  
Vice President/Plant Manager

Attachment: Release Calculation  
FPC Written Notification (March 26, 2007)

50% Caustic Release at U-9

Date of Incident: 03/15/2007

Calculation using Orifice Flowmeter Calculator

Input Data

Flange Tap internal diameter: 6 inch (1" bleed)  
Material: CS  
Temperature: 75 °F  
Pressure: 50 PSIG\*  
Viscosity: 72 Centipoise  
Density: 94.84 lb/ft<sup>3</sup>  
Maximum Differential Pressure: 1384 inches W.C.  
Orifice bore: 0.0078125 inches (1/128")\*\*

Output Data

Maximum Flow: 0.00154 lb/s = 5.544 lb/h (=133.1 lb/d)

Duration of leak

Based on eyewitness testimony.

Leak discovered 16:00 03/15/07

Leak stopped 14:10 03/23/07

Total duration of leak = 193.83 hours

Total leak = 5.544 lb/hr x 193.83 hr = 1074.6 lb\*\*\*

\* Assumed pressure of main caustic supply header

\*\* Assumed bore diameter of internal leak of 6" valve that had leak-by. 50% Caustic flowed through 6" valve internal leak and then through 1" open bleed valve.

\*\*\* Only a small but unknown portion of this calculated amount had potential for groundwater contamination. This calculated amount represents a worst case scenario for potential groundwater contamination and the actual amount released over the time period specified will be much less than the calculated value.

% composition by mass and Quantities Released

Component	%	lb
NaOH	50.00	537.3
H2O	50.00	537.3

Note: Temperature and pressure used in calculations are averaged values over duration of release.

Prepared By Armando D. Lopez

Date 04/24/2007

Dept. Manager \_\_\_\_\_

Date \_\_\_\_\_



Formosa Plastics\*

Formosa Plastics Corporation, Louisiana  
P.O. Box 271  
Baton Rouge, LA 70821-0271  
Telephone: (225)-356-3341  
Fax: (225)-356-8611

March 26, 2007

**CERTIFIED MAIL (7003 1010 0005 5155 9989) RETURN RECEIPT REQUESTED**

Louisiana Department of Environmental Quality  
Post Office Box 82215  
Baton Rouge, LA 70884-2215  
ATTENTION: SURVEILLANCE DIVISION-SPOC  
"UNAUTHORIZED DISCHARGE NOTIFICATION REPORT"

**RE: Formosa Plastics Corporation, Louisiana ID# LAD 041 224 932  
Groundwater Contamination Notification  
LAC 33:3919  
Section VII (HSWA Provisions)  
Post Closure Permit No. LAD041224932  
AI No. 288**

Dear Sir:

In accordance with LAC 33:3919, LAC 33:3923, LAC 33:3925 and Section VII (HSWA Provisions) of Formosa Plastics Corporation, Louisiana (FPC's) Post Closure Permit No. LAD041224932, FPC submits this written notification to a telephone report on March 20, 2007 of potential groundwater contamination at the FPC facility. Scott Longon, Environmental Engineer, reported the potential groundwater contamination to Ms. Cindy LaFosse, with the Louisiana Department of Environmental Quality (LDEQ), at approximately 3:05pm on March 20, 2007. Details are summarized below.

On March 19, 2006 FPC was repairing a buried fire water line in the area of the facility that was formerly known as the VCM I Unit (the VCM I Unit is no longer an active production unit). As part of the fire water line repair activity, maintenance personnel dug a shallow trench to access the buried pipe. Following the digging operations, liquid was observed in the shallow trench and two personnel received first-aid after coming into contact with the liquid. The liquid was sampled and analytical testing of the liquid sample indicated the sample contained approximately 2.6% caustic soda (i.e. sodium hydroxide; CAS Number: 1310-73-2; DOT Hazard Classification: 8).

To determine probable fate and off-site impact, recent pH analytical data were reviewed for RW-3, a nearby groundwater recovery well screened in a shallow groundwater zone. The RW-3 pH analytical data reviewed did not indicate an impact of caustic soda on the groundwater quality of RW-3 and therefore the impact to groundwater appears to be localized with no known off-site impact.



March 26, 2007

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As an immediate corrective action, FPC is collecting and pumping the potentially impacted liquids from the trench for on-site recovery and neutralization. FPC has also initiated an investigation to determine the possible source(s) of the caustic soda. FPC anticipates submitting an update to this written notification, which will provide the findings of the investigation, within 30 days.

If you need additional information please contact Mr. Omer Wolff, Environmental and Safety Manager, at (225) 358-8511.

Sincerely,

**FORMOSA PLASTICS CORP., LA**

A handwritten signature in cursive script that reads "Kelly Serio".

Kelly Serio  
Vice President/Plant Manager