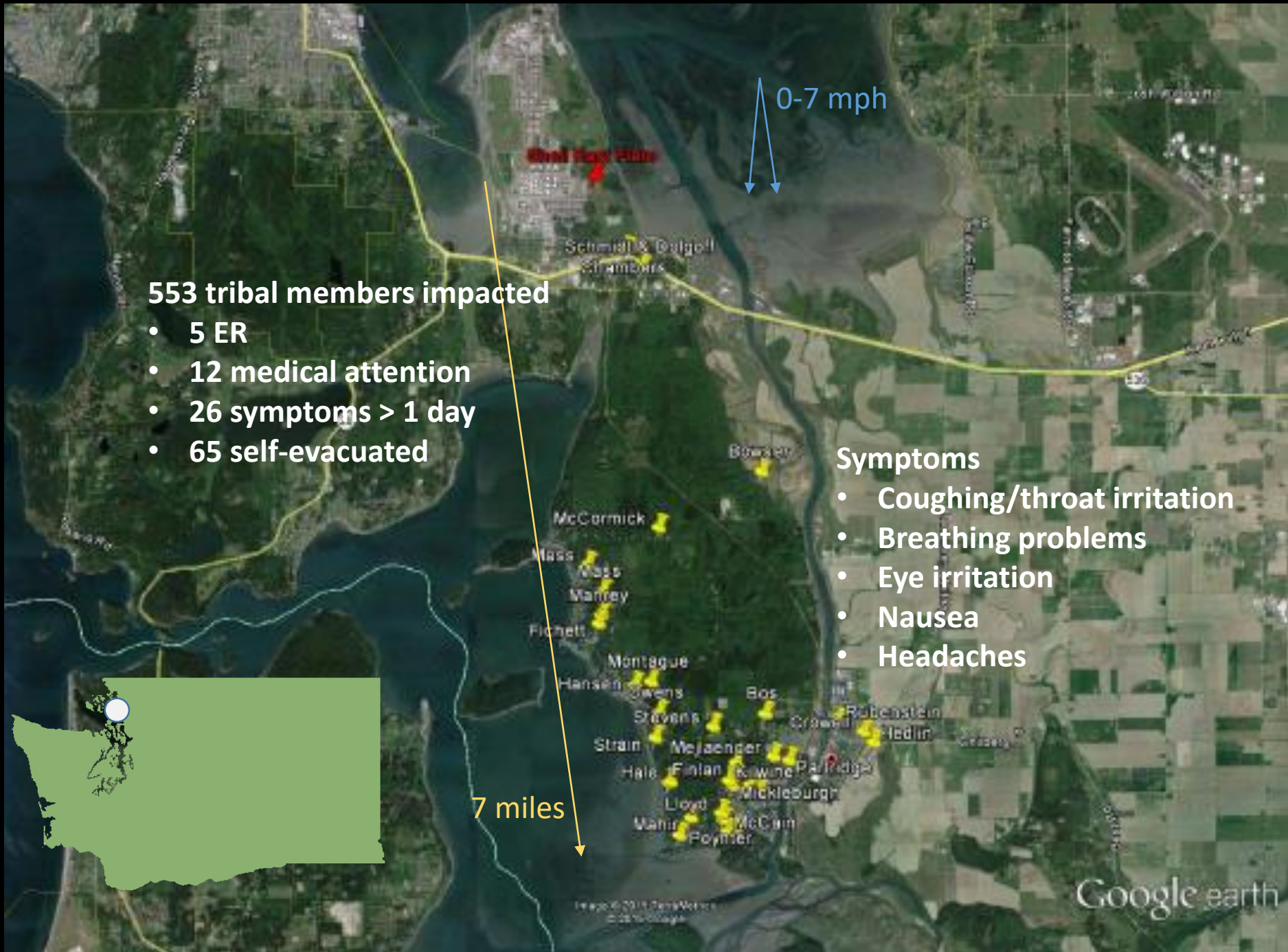


A large industrial facility, possibly a refinery or chemical plant, is situated in the foreground. The facility consists of numerous tall distillation columns, complex piping, and storage tanks. A prominent smokestack on the right side is emitting a thick plume of white steam or smoke that drifts across the sky. In the background, a range of rugged mountains is visible, with the highest peaks covered in snow and partially obscured by soft, white clouds. The sky is a pale blue, suggesting a clear or slightly hazy day. The overall scene contrasts the industrial activity with the natural beauty of the mountains.

THREADING THE NEEDLE

Enforcement strategy



553 tribal members impacted

- 5 ER
- 12 medical attention
- 26 symptoms > 1 day
- 65 self-evacuated

Symptoms

- Coughing/throat irritation
- Breathing problems
- Eye irritation
- Nausea
- Headaches



7 miles

0-7 mph

Google earth

What Happened on February 20, 2015?

Partial facility shutdown (including the main flare)

Worker safety

Community safety

Decontamination procedure shortcuts prior to steaming

On-site priorities and focus

History

Wet stream to flare – doused the flame. Release of mercaptans, H₂S, dimethyl sulfide, and benzene that impacted downwind communities.

Weather conditions

Shell refinery apologizes for odor released over Anacortes

Posted: Tuesday, February 24, 2015 10:37 am

ANACORTES, Wash. (AP) — The Shell oil refinery at Anacortes has apologized to its neighbors in Skagit County for releasing a strong sulfur odor.

The Skagit Valley Herald (<http://bit.ly/18hVGVA>) the odor was reported in the area and was stopped as soon as the source was identified.

Maintenance work at Shell Refinery causes bad odors

By Evan Marczynski | Posted: Saturday, February 21, 2015 6:30 pm

ANACORTES — A strong chemical odor from the Shell Puget Sound Refinery late Friday afternoon had an impact on some of its neighbors, and the chairman of the Swinomish Indian Tribal Community says he wants answers.

At least 13 instances of offensive odors were reported Friday to the Northwest Clean Air Agency, which said the affected areas included the Swinomish reservation and La Conner. An air quality inspector went to the scene to investigate the source of the odor, the agency said.

The Skagit County Department of Emergency Management issued an alert Friday night saying the odor was expected to dissipate with time but advised anyone who felt ill to call 911 or visit a hospital.



Harsh chemical odor in Skagit County coming from Shell refinery, sheriff's office says

POSTED 7:52 PM, FEBRUARY 20, 2015, BY Q13 FOX NEWS STAFF, UPDATED AT 07:53PM, FEBRUARY 20, 2015

Shell Refinery odors

The skies were clear over the Shell Anacortes refinery Saturday, but a strong odor emanating from the plant has caused numerous complaints. Colette Weeks, Skagit Valley Herald

ANACORTES, Wash. — The Skagit County Sheriff's Office said Friday the Shell Puget Sound Refinery in Anacortes is the source of the harsh chemical smell that the public has complained about in the area.

The sheriff's office said the refinery has a flare that is out of service for maintenance, and that is causing the odor. The flare is now capped, the sheriff's office said, but the odor is lingering.



The Shell Puget Sound Refinery on the south end of March Point. Padilla Bay is in the background. (Photo: Shell)

EPA SSM Provisions



EPA

Tribe

NWCAA

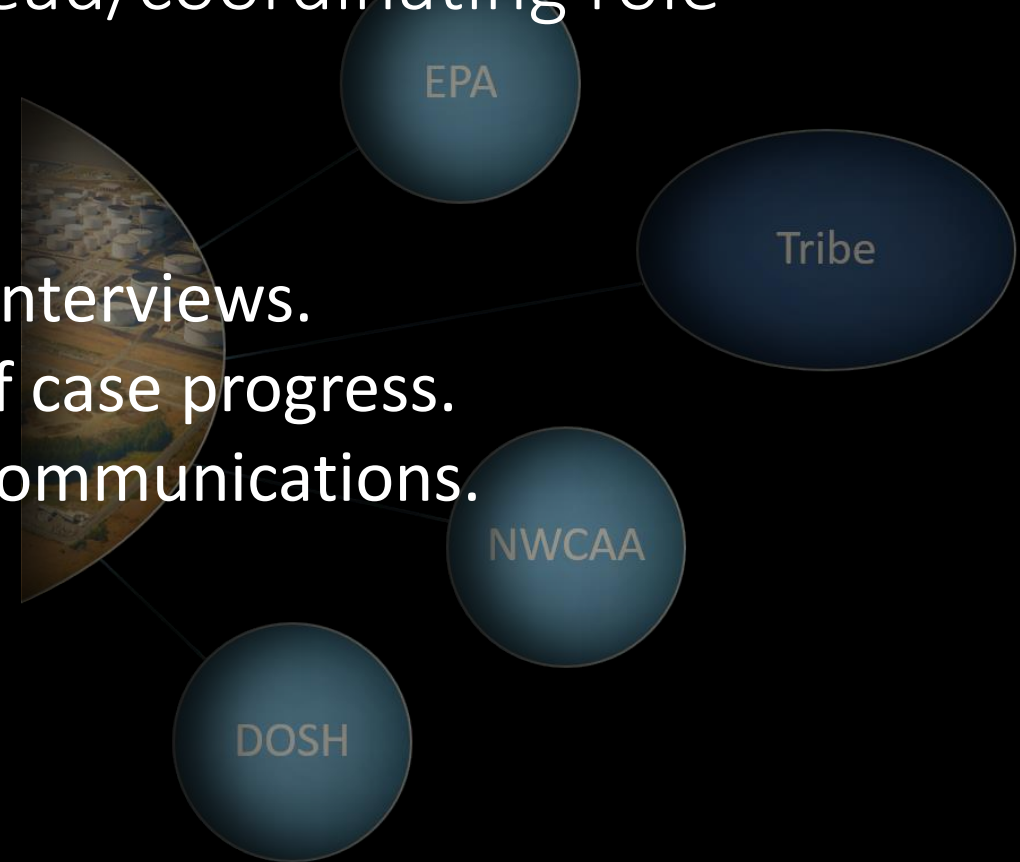
DOSH

- Emergency Management/911
- Health Department

Strategic Plan: NWCAA in lead/coordinating role


Stakeholder agreements:

- Coordinated investigation interviews.
- Informal communication of case progress.
- Tribal considerations and communications.



Outcomes

- NEW – NO RELEASE procedure
- DOSH violation & settlement \$77,000
- NWCAA violation & penalty \$133,000 – November 2016
 - General duty violations under NSPS & NESHAP
 - Statutory maximum collected
- EPA has 5 year SOL (Feb 2020)

 1600 South Second Street
Mount Vernon, WA 98273-5202
ph 360.428.1617
fax 360.428.1620
www.nwcleanair.org

NOTICE OF VIOLATION
This notice is provided pursuant to NWCAA Reg. 131 and RCW 70.94.

CASE NUMBER: 4179 **Violator:** Shell Puget Sound Refinery

DATE OF VIOLATION: 2/20/2015

VIOLATOR(S): Shell Puget Sound Refinery
PO Box 622
Anacortes, WA 98221-0622

OWNER(S):

DID YOU KNOW? Shell Puget Sound Refinery is a regulated source under the Clean Air Act.

AND FOR INFORMATION: 40 CFR 60.11(d), 40 CFR 60.18(c)(2), 40 CFR 60.18(e), 40 CFR 63.11(b)(3), 40 CFR 63.11(b)(5), 40 CFR 63.6(e)(1), Section 535.1, Section 535.3, Section 535.4, WAC 173-400-040(5) and WAC 173-400-040(6).

NOTICE OF IMPOSITION OF PENALTY


TO: Shell Puget Sound Refinery
PO Box 622
Anacortes, WA 98221-0622

The Northwest Clean Air Agency (NWCAA) hereby levies a civil penalty against you in the sum of \$133,000.00.

You have incurred this penalty for the following violations and/or acts of commission or omission as detailed in Notice of Violation (NOV) 4179. (Regulation(s) cited: 40 CFR 60.11(d), 40 CFR 60.18(c)(2), 40 CFR 60.18(e), 40 CFR 63.11(b)(3), 40 CFR 63.11(b)(5), 40 CFR 63.6(e)(1), Section 535.1, Section 535.3, Section 535.4, WAC 173-400-040(5) and WAC 173-400-040(6). Please find a copy of NOV 4179 enclosed detailing these violations.

The Agency authority to issue this penalty is under RCW 70.94.431, WAC 173-400-230(2), and NWCAA Regulation Section 133.

This penalty, \$133,000.00, is immediately due and payable to the Treasurer of the NWCAA, 1600 South Second Street, Mount Vernon, WA 98273-5202.


Mark Buford, Deputy Director

November 15, 2016
Date



Lessons Learned...

Questions?

Toby Mahar
Northwest Clean Air Agency
tobym@nwcleanairwa.gov

