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Benzene Fenceline Monitoring at Refineries: U.S. EPA Office of Inspector General Project Notification



Walter Wright, Jr. wwright@mwlaw.com (501) 688.8839

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The United States Environmental Protection Agency ("EPA") Office of Inspector General ("OIG") issued a February 22nd Notification of Audit ("Notification") titled:

Benzene Fenceline Monitoring at Refineries

See Project No. OA-FY22-0070.

The Notification is transmitted from Tim Lovingood, Director, OIG Office of Audit – Pollution Control and Cleanup Directorate to EPA Acting Assistant Administrator Joseph Goffman, Office of Air and Radiation and Lawrence Starfield, Acting Assistant Administrator, Office of Enforcement and Compliance Assurance.

OIG states that the audit will address EPA's benzene fenceline monitoring program for petroleum refineries. The objective is stated to include determining to what extent oversight of the benzene fenceline monitoring program by EPA and delegated state and local agencies:

... assures that refineries take corrective action and lower benzene, as required, when measured benzene concentrations exceed the action level.

The Notification further characterizes the intent of the fenceline monitoring program as assuring that petroleum refineries exceeding a certain annual average benzene concentration (i.e., the action limit) at their perimeter or fenceline take corrective actions to lower the benzene concentrations.

EPA updated the Petroleum Refinery Sector Rule in 2015. The upgrade included a requirement that petroleum refineries conduct continuous fenceline monitoring of benzene along the facility's perimeter. See 40 CFR § 63.658. The rule requires:

- Samplers placed on the property boundary
- Periodic collection of the results of the sampling for laboratory analysis of benzene concentrations
- Reporting to EPA on a quarterly basis through its data management system
- Root cause/corrective action analysis in specified circumstances

OIG provides in the Notification that it will conduct its fieldwork at EPA headquarters, selected EPA Regions, and delegated state and local agencies.

A copy of the Notification can be downloaded <u>here</u>.