

## Section 1. Registration Information

### Source Identification

---

Facility Name:	LRBG Chemicals (USA) Inc
Parent Company #1 Name:	N/A
Submission Type:	Resubmission
Receipt Date:	March 2021

### Facility Identification

---

Facility ID:	1000 0011 5412
--------------	----------------

### Dun and Bradstreet Numbers (DUNS)

---

Facility DUNS:	116722007
----------------	-----------

### Facility Location Address

---

Street 1:	2112 Sylvan Avenue
Street 2:	P.O. Box 2570
City:	Toledo
State:	OH
ZIP:	43606
ZIP4:	N/A
County:	Lucas

### Facility Latitude and Longitude

---

Latitude (decimal):	41.661944
Longitude (decimal):	-083.572778

### Local Emergency Planning Committee and Regulations

---

LEPC:	Lucas County LEPC
OSHA PSM:	Yes
EPCRA 302:	Yes
CAA Title V:	Yes

## Process Chemicals

---

Program Level:	Program Level 3 process
Chemical Name:	Formaldehyde (solution)
CAS Number:	50-00-0
Flammable/Toxic:	Toxic

## Process NAICS

---

NAICS Code:	325211
NAICS Description:	Plastics Material and Resin Manufacturing

## Section 6. Accident History

### Accident History ID: Accident 1

---

Date of Accident:	October 2020
Time Accident Began (HH:MM):	17:00
NAICS Code of Process Involved:	325211
NAICS Description:	Plastics Material and Resin Manufacturing
Release Duration:	000 Hours 20 Minutes

## Release Event

---

Gas Release:	N/A
Liquid Spill/Evaporation:	Yes
Fire:	N/A
Explosion:	N/A
Uncontrolled/Runaway Reaction:	N/A

## Release Source

---

Storage Vessel:	N/A
Piping:	N/A
Process Vessel:	Yes
Transfer Hose:	N/A
Valve:	N/A
Pump:	N/A
Joint:	N/A
Other Release Source:	N/A

## Weather Conditions at the Time of Event

---

Wind Speed:	N/A
Units:	N/A
Direction:	N/A
Temperature:	N/A
Atmospheric Stability Class:	N/A
Precipitation Present:	N/A
Unknown Weather Conditions:	Yes

## On-Site Impacts

---

Employee or Contractor Deaths:	0
Public Responder Deaths:	0
Public Deaths:	0
Employee or Contractor Injuries:	0
Public Responder Injuries:	0
Public Injuries:	0
On-Site Property Damage (\$):	0

## Known Off-Site Impacts

---

Deaths:	0
Hospitalizations:	0
Public Deaths:	0
Other Medical Treatments:	0
Evacuated:	0
Sheltered-in-Place:	0
Off-Site Property Damage (\$):	0

## Environmental Damage

---

Fish or Animal Kills:	N/A
Tree, Lawn, Shrub, or Crop Damage:	N/A
Water Contamination:	N/A
Soil Contamination:	N/A
Other Environmental Damage:	N/A

## Initiating Event

---

Initiating Event:	Equipment Failure
-------------------	-------------------

## Contributing Factors

---

Equipment Failure:	Yes
Human Error:	Yes
Improper Procedures:	N/A
Overpressurization:	N/A
Upset Condition:	N/A
By-Pass Condition:	N/A
Maintenance Activity/Inactivity:	N/A
Process Design Failure:	N/A
Unsuitable Equipment:	N/A
Unusual Weather Condition:	N/A
Management Error:	N/A
Other Contributing Factor:	N/A

## Off-Site Responders Notified

---

Off-Site Responders Notified:	No, not notified
-------------------------------	------------------

## Changes Introduced as a Result of the Accident

---

Improved or Upgraded Equipment:	Yes
Revised Maintenance:	N/A
Revised Training:	N/A
Revised Operating Procedures:	N/A
New Process Controls:	N/A
New Mitigation Systems:	N/A
Revised Emergency Response Plan:	N/A
Changed Process:	N/A
Reduced Inventory:	N/A
None:	N/A
Other Changes Introduced:	Programming changed in PLC

## Chemicals in Accident History

---

Quantity Released (lbs):	10
Percent Weight:	22
Chemical Name:	Formaldehyde (solution)
CAS Number:	50-00-0
Flammable/Toxic:	Toxic

## Accident History ID: Accident 2

---

Date of Accident:	May 2018
Time Accident Began (HH:MM):	08:10
NAICS Code of Process Involved:	325211
NAICS Description:	Plastics Material and Resin Manufacturing
Release Duration:	000 Hours 05 Minutes

## Release Event

---

Gas Release:	N/A
Liquid Spill/Evaporation:	Yes
Fire:	N/A
Explosion:	N/A
Uncontrolled/Runaway Reaction:	N/A

## Release Source

---

Storage Vessel:	N/A
Piping:	N/A
Process Vessel:	N/A
Transfer Hose:	N/A
Valve:	Yes
Pump:	N/A
Joint:	N/A
Other Release Source:	Truckers Valve was leaking, not LRBG valve

## Weather Conditions at the Time of Event

---

Wind Speed:	10.0
Units:	Miles/h
Direction:	SSW
Temperature:	62
Atmospheric Stability Class:	C
Precipitation Present:	N/A
Unknown Weather Conditions:	N/A

### On-Site Impacts

---

Employee or Contractor Deaths:	0
Public Responder Deaths:	0
Public Deaths:	0
Employee or Contractor Injuries:	0
Public Responder Injuries:	0
Public Injuries:	0
On-Site Property Damage (\$):	0

### Known Off-Site Impacts

---

Deaths:	0
Hospitalizations:	0
Public Deaths:	0
Other Medical Treatments:	0
Evacuated:	0
Sheltered-in-Place:	0
Off-Site Property Damage (\$):	0

### Environmental Damage

---

Fish or Animal Kills:	N/A
Tree, Lawn, Shrub, or Crop Damage:	N/A
Water Contamination:	N/A
Soil Contamination:	N/A
Other Environmental Damage:	N/A

### Initiating Event

---

Initiating Event:	Equipment Failure
-------------------	-------------------

## Contributing Factors

---

Equipment Failure:	Yes
Human Error:	N/A
Improper Procedures:	N/A
Overpressurization:	N/A
Upset Condition:	N/A
By-Pass Condition:	N/A
Maintenance Activity/Inactivity:	N/A
Process Design Failure:	N/A
Unsuitable Equipment:	N/A
Unusual Weather Condition:	N/A
Management Error:	N/A
Other Contributing Factor:	Truckers Valve was leaking, not LRBG valve

## Off-Site Responders Notified

---

Off-Site Responders Notified:	No, not notified
-------------------------------	------------------

## Changes Introduced as a Result of the Accident

---

Improved or Upgraded Equipment:	N/A
Revised Maintenance:	N/A
Revised Training:	N/A
Revised Operating Procedures:	N/A
New Process Controls:	N/A
New Mitigation Systems:	N/A
Revised Emergency Response Plan:	N/A
Changed Process:	N/A
Reduced Inventory:	N/A
None:	N/A
Other Changes Introduced:	Very small release (1/4 to 1/2 cup)...procedures and equipment to stop leak worked

## Chemicals in Accident History

---

Quantity Released (lbs):	1
Percent Weight:	45
Chemical Name:	Formaldehyde (solution)
CAS Number:	50-00-0
Flammable/Toxic:	Toxic

### Accident History ID: Accident 3

---

Date of Accident:	February 2018
Time Accident Began (HH:MM):	10:15
NAICS Code of Process Involved:	325211
NAICS Description:	Plastics Material and Resin Manufacturing
Release Duration:	000 Hours 15 Minutes

### Release Event

---

Gas Release:	N/A
Liquid Spill/Evaporation:	Yes
Fire:	N/A
Explosion:	N/A
Uncontrolled/Runaway Reaction:	N/A

### Release Source

---

Storage Vessel:	N/A
Piping:	N/A
Process Vessel:	Yes
Transfer Hose:	N/A
Valve:	N/A
Pump:	N/A
Joint:	N/A
Other Release Source:	N/A

### Weather Conditions at the Time of Event

---

Wind Speed:	N/A
Units:	N/A
Direction:	N/A
Temperature:	N/A
Atmospheric Stability Class:	N/A
Precipitation Present:	N/A
Unknown Weather Conditions:	Yes



## On-Site Impacts

---

Employee or Contractor Deaths:	0
Public Responder Deaths:	0
Public Deaths:	0
Employee or Contractor Injuries:	0
Public Responder Injuries:	0
Public Injuries:	0
On-Site Property Damage (\$):	0

## Known Off-Site Impacts

---

Deaths:	0
Hospitalizations:	0
Public Deaths:	0
Other Medical Treatments:	0
Evacuated:	0
Sheltered-in-Place:	0
Off-Site Property Damage (\$):	0

## Environmental Damage

---

Fish or Animal Kills:	N/A
Tree, Lawn, Shrub, or Crop Damage:	N/A
Water Contamination:	N/A
Soil Contamination:	N/A
Other Environmental Damage:	N/A

## Initiating Event

---

Initiating Event:	Equipment Failure
-------------------	-------------------

## Contributing Factors

---

Equipment Failure:	N/A
Human Error:	Yes
Improper Procedures:	Yes
Overpressurization:	N/A
Upset Condition:	N/A
By-Pass Condition:	N/A
Maintenance Activity/Inactivity:	N/A
Process Design Failure:	N/A
Unsuitable Equipment:	N/A
Unusual Weather Condition:	N/A
Management Error:	N/A
Other Contributing Factor:	N/A

## Off-Site Responders Notified

---

Off-Site Responders Notified:	No, not notified
-------------------------------	------------------

## Changes Introduced as a Result of the Accident

---

Improved or Upgraded Equipment:	N/A
Revised Maintenance:	Yes
Revised Training:	N/A
Revised Operating Procedures:	N/A
New Process Controls:	N/A
New Mitigation Systems:	N/A
Revised Emergency Response Plan:	N/A
Changed Process:	N/A
Reduced Inventory:	N/A
None:	N/A
Other Changes Introduced:	Bucket to capture amount when breaking line during maintenance

## Chemicals in Accident History

---

Quantity Released (lbs):	9
Percent Weight:	45
Chemical Name:	Formaldehyde (solution)
CAS Number:	50-00-0
Flammable/Toxic:	Toxic

## Accident History ID: Accident 4

---

Date of Accident:	August 2014
Time Accident Began (HH:MM):	00:30
NAICS Code of Process Involved:	325211
NAICS Description:	Plastics Material and Resin Manufacturing
Release Duration:	000 Hours 03 Minutes

## Release Event

---

Gas Release:	N/A
Liquid Spill/Evaporation:	Yes
Fire:	N/A
Explosion:	N/A
Uncontrolled/Runaway Reaction:	N/A

## Release Source

---

Storage Vessel:	N/A
Piping:	N/A
Process Vessel:	Yes
Transfer Hose:	N/A
Valve:	N/A
Pump:	N/A
Joint:	N/A
Other Release Source:	N/A

## Weather Conditions at the Time of Event

---

Wind Speed:	N/A
Units:	N/A
Direction:	N/A
Temperature:	N/A
Atmospheric Stability Class:	N/A
Precipitation Present:	N/A
Unknown Weather Conditions:	Yes

### On-Site Impacts

---

Employee or Contractor Deaths:	0
Public Responder Deaths:	0
Public Deaths:	0
Employee or Contractor Injuries:	0
Public Responder Injuries:	0
Public Injuries:	0
On-Site Property Damage (\$):	0

### Known Off-Site Impacts

---

Deaths:	0
Hospitalizations:	0
Public Deaths:	0
Other Medical Treatments:	0
Evacuated:	0
Sheltered-in-Place:	0
Off-Site Property Damage (\$):	0

### Environmental Damage

---

Fish or Animal Kills:	N/A
Tree, Lawn, Shrub, or Crop Damage:	N/A
Water Contamination:	N/A
Soil Contamination:	N/A
Other Environmental Damage:	N/A

### Initiating Event

---

Initiating Event:	Human Error
-------------------	-------------

## Contributing Factors

---

Equipment Failure:	N/A
Human Error:	Yes
Improper Procedures:	N/A
Overpressurization:	N/A
Upset Condition:	N/A
By-Pass Condition:	N/A
Maintenance Activity/Inactivity:	N/A
Process Design Failure:	N/A
Unsuitable Equipment:	N/A
Unusual Weather Condition:	N/A
Management Error:	N/A
Other Contributing Factor:	N/A

## Off-Site Responders Notified

---

Off-Site Responders Notified:	No, not notified
-------------------------------	------------------

## Changes Introduced as a Result of the Accident

---

Improved or Upgraded Equipment:	N/A
Revised Maintenance:	N/A
Revised Training:	Yes
Revised Operating Procedures:	Yes
New Process Controls:	N/A
New Mitigation Systems:	N/A
Revised Emergency Response Plan:	N/A
Changed Process:	N/A
Reduced Inventory:	N/A
None:	N/A
Other Changes Introduced:	N/A

## Chemicals in Accident History

---

Quantity Released (lbs):	50
Percent Weight:	45
Chemical Name:	Formaldehyde (solution)
CAS Number:	50-00-0
Flammable/Toxic:	Toxic

## Accident History ID: Accident 5

---

Date of Accident:	May 2014
Time Accident Began (HH:MM):	06:00
NAICS Code of Process Involved:	325211
NAICS Description:	Plastics Material and Resin Manufacturing
Release Duration:	000 Hours 15 Minutes

## Release Event

---

Gas Release:	N/A
Liquid Spill/Evaporation:	Yes
Fire:	N/A
Explosion:	N/A
Uncontrolled/Runaway Reaction:	N/A

## Release Source

---

Storage Vessel:	N/A
Piping:	N/A
Process Vessel:	N/A
Transfer Hose:	N/A
Valve:	Yes
Pump:	N/A
Joint:	N/A
Other Release Source:	N/A

## Weather Conditions at the Time of Event

---

Wind Speed:	N/A
Units:	N/A
Direction:	N/A
Temperature:	N/A
Atmospheric Stability Class:	N/A
Precipitation Present:	N/A
Unknown Weather Conditions:	Yes

## On-Site Impacts

---

Employee or Contractor Deaths:	0
Public Responder Deaths:	0
Public Deaths:	0
Employee or Contractor Injuries:	0
Public Responder Injuries:	0
Public Injuries:	0
On-Site Property Damage (\$):	0

## Known Off-Site Impacts

---

Deaths:	0
Hospitalizations:	0
Public Deaths:	0
Other Medical Treatments:	0
Evacuated:	0
Sheltered-in-Place:	0
Off-Site Property Damage (\$):	0

## Environmental Damage

---

Fish or Animal Kills:	N/A
Tree, Lawn, Shrub, or Crop Damage:	N/A
Water Contamination:	N/A
Soil Contamination:	N/A
Other Environmental Damage:	N/A

## Initiating Event

---

Initiating Event:	Equipment Failure
-------------------	-------------------

## Contributing Factors

---

Equipment Failure:	N/A
Human Error:	Yes
Improper Procedures:	N/A
Overpressurization:	N/A
Upset Condition:	N/A
By-Pass Condition:	N/A
Maintenance Activity/Inactivity:	N/A
Process Design Failure:	N/A
Unsuitable Equipment:	N/A
Unusual Weather Condition:	N/A
Management Error:	N/A
Other Contributing Factor:	N/A

## Off-Site Responders Notified

---

Off-Site Responders Notified:	No, not notified
-------------------------------	------------------

## Changes Introduced as a Result of the Accident

---

Improved or Upgraded Equipment:	N/A
Revised Maintenance:	Yes
Revised Training:	N/A
Revised Operating Procedures:	N/A
New Process Controls:	N/A
New Mitigation Systems:	N/A
Revised Emergency Response Plan:	N/A
Changed Process:	N/A
Reduced Inventory:	N/A
None:	N/A
Other Changes Introduced:	N/A

## Chemicals in Accident History

---

Quantity Released (lbs):	1
Percent Weight:	45
Chemical Name:	Formaldehyde (solution)
CAS Number:	50-00-0
Flammable/Toxic:	Toxic



## Accident History ID: Accident 6

---

Date of Accident:	March 2014
Time Accident Began (HH:MM):	08:00
NAICS Code of Process Involved:	325211
NAICS Description:	Plastics Material and Resin Manufacturing
Release Duration:	000 Hours 05 Minutes

## Release Event

---

Gas Release:	N/A
Liquid Spill/Evaporation:	Yes
Fire:	N/A
Explosion:	N/A
Uncontrolled/Runaway Reaction:	N/A

## Release Source

---

Storage Vessel:	N/A
Piping:	N/A
Process Vessel:	N/A
Transfer Hose:	N/A
Valve:	N/A
Pump:	N/A
Joint:	Yes
Other Release Source:	N/A

## Weather Conditions at the Time of Event

---

Wind Speed:	N/A
Units:	N/A
Direction:	N/A
Temperature:	N/A
Atmospheric Stability Class:	N/A
Precipitation Present:	N/A
Unknown Weather Conditions:	Yes

### On-Site Impacts

---

Employee or Contractor Deaths:	0
Public Responder Deaths:	0
Public Deaths:	0
Employee or Contractor Injuries:	0
Public Responder Injuries:	0
Public Injuries:	0
On-Site Property Damage (\$):	0

### Known Off-Site Impacts

---

Deaths:	0
Hospitalizations:	0
Public Deaths:	0
Other Medical Treatments:	0
Evacuated:	0
Sheltered-in-Place:	0
Off-Site Property Damage (\$):	0

### Environmental Damage

---

Fish or Animal Kills:	N/A
Tree, Lawn, Shrub, or Crop Damage:	N/A
Water Contamination:	N/A
Soil Contamination:	N/A
Other Environmental Damage:	N/A

### Initiating Event

---

Initiating Event:	Equipment Failure
-------------------	-------------------

### Contributing Factors

---

Equipment Failure:	Yes
Human Error:	N/A
Improper Procedures:	N/A
Overpressurization:	N/A
Upset Condition:	N/A
By-Pass Condition:	N/A
Maintenance Activity/Inactivity:	N/A
Process Design Failure:	N/A
Unsuitable Equipment:	N/A
Unusual Weather Condition:	N/A
Management Error:	N/A
Other Contributing Factor:	N/A

### Off-Site Responders Notified

---

Off-Site Responders Notified:	No, not notified
-------------------------------	------------------

### Changes Introduced as a Result of the Accident

---

Improved or Upgraded Equipment:	Yes
Revised Maintenance:	N/A
Revised Training:	N/A
Revised Operating Procedures:	N/A
New Process Controls:	N/A
New Mitigation Systems:	N/A
Revised Emergency Response Plan:	N/A
Changed Process:	N/A
Reduced Inventory:	N/A
None:	N/A
Other Changes Introduced:	N/A

### Chemicals in Accident History

---

Quantity Released (lbs):	1
Percent Weight:	45
Chemical Name:	Formaldehyde (solution)
CAS Number:	50-00-0
Flammable/Toxic:	Toxic

## Section 9. Emergency Response

### Written Emergency Response (ER) Plan

---

Community Plan (Is facility included in written community emergency response plan?):	Yes
Facility Plan (Does facility have its own written emergency response plan?):	Yes
Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):	Yes
Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):	Yes
Healthcare (Does facility's ER plan include information on emergency health care?):	Yes

### Local Agency

---

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated):	Lucus County LEPC
Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):	(419) 213-6527