

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	April 7-10, 2025	
Media Program:	Air	
Regulatory Program(s)	Clean Air Act (CAA) § 112(r) and 40 Code of Federal Regulations (C.F.R.) Part 68 Chemical Accident Risk Management Plan (RMP)	
Company Name:	International Matex Tank Terminals	
Facility Name:	IMTT- Geismar	
Facility Physical Location:	8112 Highway 75	
(city, state, zip code)	Geismar, Louisiana 70734	
Mailing address:	P.O. Box 138	
(city, state, zip code)	Geismar, Louisiana 70734	
County/Parish:	Ascension Parish	
Facility Phone Number	225-474-1528	
Facility Contact:	Robert Nemeth	General Manager
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FRS Number:	110018855746	
Identification/Permit Number:	1000 0020 0953/ Title V 0180-00102-V1	
Media Identifier Number:	RMP 1000109571	
NAICS:	493190 Other Warehousing and Storage	
SIC:		
Personnel participating in inspection:		
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EPA Lead Inspector Signature/Date		
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Supervisor Signature/Date		
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Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

United States Environmental Protection Agency (“EPA”) Region 6 inspector Kristen Latiolais (“I”) arrived at the IMTT-Geismar facility, operated by International Matex Tank Terminals, in Geismar, Louisiana at 8:00 AM on April 7, 2025, for an announced inspection. EPA and Louisiana Department of Environmental Quality (“LDEQ”) inspectors met with Byrne Evans (Regional Director of EHSS), Ryan Meaux (Site Director of EHSS) and their Environmental and Maintenance team at the opening conference. I presented my credentials to Byrne Evans, Ryan Meaux and team, and informed them that this was an EPA inspection to evaluate compliance with the requirements of the Chemical Accident Prevention Provisions of Title 40 of the Code of Federal Regulations (“C.F.R.”) Part 68 under Clean Air Act (“CAA”) § 112(r). An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 C.F.R. § 68.115, shall comply with the requirements of the CFR Part 68. Employee representatives were invited to participate in the inspection. The facility does not have union representation.

FACILITY DESCRIPTION

IMTT-Geismar is located at 8112 Highway 75, Geismar, Louisiana 70734. The facility is in operation 24 hours a day, seven days a week and has approximately 113 employees at the Geismar location. The facility is a “for-hire” bulk liquids storage terminal, providing tank storage capacity for customers. Products are received by ship, barge, tank car, tank truck, and pipeline and are shipped by the same means. The terminal has a total storage capacity greater than 3 million barrels. Products are stored in bulk in a combination of fixed roof and floating roof storage tanks.

The facility stores more than a threshold quantity for Risk Management Plan (“RMP”) regulated substances of Dimethylamine (“DMA”), Propylene Oxide (“PO”) and Toulene Diisocyanate/mixed isomers (“TDI”).

IMTT- Geismar reported three (3) Program Level 3 covered processes subject to the requirements of EPA’s RMP regulations in its most recent RMP submission, dated January 12, 2024.

Section II - OBSERVATIONS

The documentation review began onsite with the IMTT- Geismar personnel as listed on the sign in sheets, **see Attachment 1**.

This inspection was a routine partial compliance evaluation conducted to determine compliance with the CAA RMP regulations. A file review in LADEQ’s EDMS was conducted before the on-site compliance inspection to determine compliance history. A review of the air permit conditions was conducted prior to the facility inspection.

Federal and State inspectors, conducted a walk-through of the facility on April 9, 2025, accompanied by facility representatives, to observe the facility process equipment, overall operations and major emission sources at the facility. Operators from the DCF Control room assisted during the facility tour. The facility was in operation at the time of inspection

40 C.F.R. Part 68 – CHEMICAL ACCIDENT PREVENTION PROVISION

Subpart A – General

40 C.F.R. § 68.10 Applicability – IMTT- Geismar is a stationary source that has more than a threshold quantity of regulated substances in their process. The facility is subject to the Occupational Safety and Health Administration’s (OSHA) Process Safety Management (PSM) Standard (29 C.F.R. § 1910.119) and is therefore a RMP Program 3 facility.

40 C.F.R. § 68.12 General requirements – IMTT- Geismar submitted their most recent 5-year Risk Management Plan submission on January 12, 2024. The Risk Management Plan listed the following chemicals as present in processes in amounts greater than the threshold quantity, prescribed in the standard, and therefore classified as RMP Program 3 regulated substances by rule: Dimethylamine, Propylene Oxide and Toluene Diisocyanate/mixed isomers.

40 C.F.R. § 68.15 Management – IMTT- Geismar developed a management system to oversee the implementation of the RMP Program elements. IMTT- Geismar provided an organizational chart that outlined the positions for the implementation of the individual elements of the RMP.

Subpart B – Hazard Assessment

40 C.F.R. § 68.20 Applicability – The owner or operator of a stationary source subject to this part shall prepare a worst-case release scenario analysis as provided in § 68.25 of this part and complete the five-year accident history as provided in § 68.42. IMTT- Geismar provided the worst-case release scenario analysis and a five-year accident history in the RMP.

40 C.F.R. § 68.25 Worse-case release scenario analysis – EPA reviewed the Offsite Consequence Analysis- Worst Case scenarios for Dimethylamine, Propylene Oxide and Toluene Diisocyanate/mixed isomers held in a covered process. IMTT- Geismar analyzed and reported a worse-case scenario for all chemicals in the RMP.

40 C.F.R. § 68.28(a) Alternative case Release Scenario Analysis – EPA reviewed the Offsite Consequence Analysis- Alternative release scenario for Dimethylamine, Propylene Oxide and Toluene Diisocyanate/mixed isomers on site. IMTT- Geismar analyzed and reported an alternative release scenario for all chemicals in the RMP.

40 C.F.R. § 68.30 Defining offsite impacts-population – IMTT- Geismar used the most current Census Bureau population data available in the MARPLOT software in January 2024 at the time of the RMP

update. When reviewing the offsite consequences, EPA noted several discrepancies between the RMP submittal to EPA and the documents provided on site for the toxics worst case scenario of PO, toxic alternate release scenario of PO, flammable worst-case scenario of DMA and flammable alternative release scenario of DMA [AOC 1- 68.30(a) & (d)].

40 C.F.R. § 68.33 Defining offsite impacts-environment –EPA reviewed the Offsite Consequence Analysis document with associated Marplot maps. IMTT- Geismar reported environmental receptors within a distance to endpoint, as required by § 68.22, including schools, residences, hospitals, public recreation and commercial/industrial areas.

40 C.F.R. § 68.36 Review and update – IMTT- Geismar submitted their offsite consequence analysis with its RMP submission on January 12, 2024. The next 5-year offsite consequence analysis submission is due on January 12, 2029.

40 C.F.R. § 68.39 Documentation – IMTT- Geismar operates three (3) RMP Program level 3 processes subject to this subpart and is required to prepare a worst-case release scenario analysis and complete the five-year accident history. EPA reviewed the worst-case and alternative-case scenarios provided. Methodology and explanation of the parameters for the Offsite Consequence Analysis (OCA) was documented as required by this subpart.

40 C.F.R. § 68.42 Five-year accident history – IMTT- Geismar reported three accidental releases in their RMP submission on January 12, 2024. However, the accidents reported were from 2019 and are considered outside the 5-year accident history for the inspection.

Subpart D – Program 3 Prevention Program

40 C.F.R. § 68.65 Process safety information (PSI) – IMTT- Geismar maintains a variety of technical documents used to maintain safe operation of the processes. These documents address chemical properties and associated hazards, limits for key process parameters and specific chemical inventories, and equipment design basis/configuration information. The maintenance department within the facility is assigned responsibility for maintaining and updating process safety information. Chemical-specific information, including exposure hazards and emergency response/exposure treatment considerations, is provided in safety data sheets (SDSs). In addition, the facility documented safety-related limits for specific process parameters (e.g., temperature, level, composition) in the operation manuals. IMTT- Geismar ensures that the process is maintained within these limits by using process controls and monitoring instruments, operating procedures, and protective instrument systems (e.g., automated shutdown systems).

The EPA reviewed the P&IDs for the covered processes and noted inconsistencies between the P&IDs and the equipment observed in the field in the PO unit. Two car seals were indicated on the PO unit P&IDs to be in the open position upstream from two pumps, but both were observed hanging from the valve wheel not holding any valves open. The facility corrected this deficiency while I was on site. [AOC 2 - 68.65(d)(1)(ii)].

The EPA identified refinery process equipment and piping, particularly associated with the TDI, DMA and PO covered process areas, that was not labeled, or color coded to indicate contents, direction of flow and potential hazards, per ASME standard A13.1(2023). As a result, this equipment does not conform with RAGAGEP pursuant to 40 CFR §68.65(d)(2) **[AOC 3 - 68.65(d)(2)]**.

40 C.F.R. § 68.67 Process hazard analysis (PHA) – IMTT- Geismar has a comprehensive PHA program to ensure that hazards associated with the various processes are identified and controlled. Within this program, the covered process is systematically examined to identify hazards and ensure that adequate controls are in place to manage those hazards. However, IMTT- Geismar failed to address the hazards of the process for node 5 in the 2021 PHA revalidation for TDI **[AOC 4- 68.67(c)(1)]**. IMTT- Geismar primarily uses the Hazard and Operability (HAZOP) and Layer of Protection Analysis (LOPA) techniques to perform these evaluations. These analyses are supposed to be conducted using a team who has operating, maintenance, experience, and engineering expertise. However, IMTT- Geismar failed to include a PO terminal operator on the PHA team for the 2021 PHA Revalidation **[AOC 5- 68.67(d) & 68.83(b)]**.

To ensure that the process controls and/or process hazards do not deviate significantly from the original design safety features, IMTT- Geismar periodically updates and revalidates its process hazard analyses. These periodic reviews are conducted at least every five years and will be conducted at this frequency until the process is no longer operating. The results and recommendations from these updates are documented and retained in the facility's Environmental Management System (Intelex) where they are tracked to completion.

40 C.F.R. § 68.69 Operating procedures – IMTT- Geismar maintains written procedures that address various modes of operations, such as unit startup, normal operations, temporary operations, emergency shutdown, normal shutdown, and initial startup of a new process. A section of the operating manual contains safe operating conditions and limits for each production area as required which is consistent to process safety information. These procedures can be used as a reference by experienced operators and provide a basis for consistent training of new operators. The written operating procedures are readily available to operators to use as necessary to safely perform their job tasks.

EPA reviewed several operating procedures which included: initial startup, normal operations, temporary, emergency shutdown, emergency operations and normal shutdowns. IMTT- Geismar's operating procedures for the TDI, DMA and PO units did not address the consequences of deviation and steps required to correct or avoid deviation. Also, Personal Protective Equipment (PPE) or hazards listed in the procedures were inconsistent with the hazards of working with the process. Additionally, conditions under which emergency shutdown is required was not included in select procedures **[AOC 6 - 68.69(a)]**. IMTT- Geismar also failed to certify operating procedures on an annual basis **[AOC 7- 68.69(c)]**.

40 C.F.R. § 68.71 Training – IMTT- Geismar has implemented a training program for all employees involved in operating a process. All operations employees receive basic training in the facility operations. After operators demonstrate (e.g., through tests, skills demonstration) having adequate knowledge to perform the duties and tasks in a safe manner on their own, they can work independently. In addition, all operators periodically receive refresher training on the operating procedures to ensure that their skills and knowledge are maintained at an acceptable level. As required per 40 C.F.R. 68.71, refresher training is conducted every three years or more often if determined to be necessary.

IMTT- Geismar provided EPA with their available training documentation and corresponding policy. This subpart requires each new employee to be trained in an overview of the process, the operating procedures, and provide refresher training at least every three years. The EPA reviewed the training records of fifteen (15) selected process operators associated with the tank farm, maintenance and emergency response. IMTT- Geismar provided initial and refresher training records for multiple employees addressing an overview of the process, operating procedures, HAZWOPER, first responder, and fire brigade training. However, IMTT- Geismar failed to maintain initial training records for three (3) operators and maintenance employees. **[AOC 8 - 68.71(a) & (c)].**

IMTT- Geismar provided a form that documents the consultation on the frequency of refresher training for operators. However, the documentation of the consultation of refresher training was not being utilized **[AOC 9 - 68.71(b)].**

40 C.F.R. § 68.73 Mechanical integrity (MI) – IMTT- Geismar uses established practices and procedures to maintain pressure vessels, piping systems, relief and vent systems, controls, pumps and compressors, and emergency shutdown systems in a safe operating condition. The basic aspects of this program include developing written procedures, performing and documenting inspections and tests, correcting identified deficiencies, and applying quality assurance measures. Inspections and tests are completed to evaluate equipment functioning as compared to that intended, and to verify that equipment is within acceptable limits (e.g., adequate wall thickness for pressure vessels). If a deficiency is identified, the deficiency is corrected before placing the equipment back into service (if possible), or a management of change team will review the use of the equipment and determine what actions are necessary to ensure the safe operation of the equipment.

EPA reviewed the written procedures IMTT- Geismar established to maintain the ongoing integrity of the process equipment. The review was conducted both on site and in further detail after leaving the facility, post- inspection. EPA examined the inspections and tests performed on equipment to ensure that the frequency of inspections and tests of process equipment are consistent with applicable manufacturers' recommendations and recognized and generally accepted good engineering practices (RAGAGEP).

EPA requested initial and refresher training documentation for maintenance employees who are directly involved in the process and maintain process equipment. The facility has procedures in place for

maintenance activities but was unable to provide training documentation indicating the maintenance personnel are trained on these procedures [AOC 10- 68.73(c)].

40 C.F.R. § 68.75 Management of change (MOC) – IMTT- Geismar has a system to manage changes to processes. This system requires that changes to items such as process equipment, chemicals, technology (including process operating conditions), procedures, and other facility changes be properly reviewed and authorized before being implemented. Changes are reviewed to ensure that adequate controls are in place to manage any new hazards and verify that existing controls have not been compromised by the change. Affected chemical hazard information, process technology information, and equipment information, as well as procedures are updated to incorporate these changes.

40 C.F.R. § 68.77 Pre-startup safety review (PSSR) – IMTT- Geismar personnel conduct a PSSR for any new facility or facility modification that requires a change in the process safety information (not required for replacement in kind). The review ensures that safety features, procedures, personnel, and the equipment are appropriately prepared for startup prior to placing the equipment into service. This review provides one additional check to make sure construction is in accordance with the design specifications and that all supporting systems are operationally ready. A review involves field verification of the construction and serves a quality assurance function.

40 C.F.R. § 68.79 Compliance Audits – To ensure that the accident prevention program is functioning properly, IMTT- Geismar periodically conducts audits to confirm the procedures and practices required by the accident prevention program are being implemented. Compliance audits are conducted at least every three years.

EPA reviewed IMTT- Geismar's most recent compliance audits, conducted in 2019 and 2022. All compliance audits provided were conducted by at least one person knowledgeable in the process. IMTT- Geismar assigns audit findings to the appropriate department responsible for implementing the change.

EPA reviewed the findings and recommendations to the compliance audits provided during the inspection. IMTT- Geismar failed to promptly determine and document an appropriate response to each of the findings and recommendations from the 2019 PSM-RMP Audit [AOC 11-68.79(d)]. The facility initiated a new method of response for the compliance audit conducted in 2022 and presented to determine and document an appropriate response to each of the findings.

40 C.F.R. § 68.81 Incident investigation – IMTT- Geismar is required to investigate each incident which resulted in, or could reasonably have resulted in, a catastrophic release of a regulated substance. IMTT- Geismar has an incident investigation procedure that requires investigation for an employee injury/accident, equipment failure, loss of product containment, fire, explosion, and in some cases, near misses. The facility uses Intelix Management System for all incident investigation reports to document and track detailed information about the incident. Facility representatives noted that initial incident investigation reports are generated and filed electronically in Intelix within 48 hours of the incident and undergo a formal root cause investigation led by the EH&S department if the incident meets a certain

criteria. Near miss incidents are not required to undergo a root cause analysis according to the facility policy. Appropriate investigation team members are determined based on the nature of the incident, such as a person knowledgeable in the process or a contract employee if the incident involved a contractor. IMTT- Geismar uses a root cause investigation and 5- Why's methodology to identify probable causes, corrective actions or recommendations, and lessons learned. Recommendations are tracked in Intelix and may lead to development of action items such as MOCs, training assignments, SOP modifications, and generated Work Orders.

EPA and State inspectors conducted a review of the LDEQ's Electronic Document Management System (EDMS) and the National Response Center (NRC). EPA also gathered multiple incident reports and near miss reports of interest to review while on site. Multiple investigation reports were not initiated within 48 hours of the discovery of the incident **[AOC 12 - 68.81(b)]**.

40 C.F.R. § 68.83 Employee participation – Employees have access to all HAZOP and LOPA information and recommendations. Operation manuals are developed, updated, and reviewed by EHSS personnel. Safety meetings are held regularly for Operations, Maintenance, Terminal, Administration, and Contract personnel. Selected topics for the safety meetings are relevant to respective personnel assigned duties, and general and specific information is provided informally to enhance employee participation in facility-wide safety performance. IMTT- Geismar provided EPA with their written employee participation plan. Employees experienced and knowledgeable in the process area evaluated are required to participate on PHA team. However, IMTT- Geismar failed to include a PO terminal operator on the PHA team for the 2021 PHA revalidation **[AOC 5- 68.67(d) & 68.83(b)]**.

40 C.F.R. § 68.85 Hot Work Permit – IMTT- Geismar's hot work procedure requires that detailed permitting takes place before, during, and after any job that has the potential to provide a source of ignition. The permit is followed through to completion of the work and those permits are maintained by the Maintenance & EHSS department. The facility implements other work permits as necessary to assure safe work conditions are communicated to maintenance and contract personnel.

EPA reviewed hot work permits and the corresponding hot work policy. The facility developed and implemented a hot work safety procedure for any work that involves burning, welding, brazing, soldering, grinding and creating sparks in areas where flammable liquids or gases may be present. This procedure is applicable to all IMTT- Geismar employees and contractors, and it outlines the responsibilities of the operations worker, supervisors, fire watch, and superintendents. The procedure delineates the different types of hot work permits, pre-requisites and procedures for conducting hot work, and duties of the fire watch which align with the fire prevention and protection requirements in 29 CFR 1910.252(a).

EPA reviewed hot work permits for the month of January 2025 that required fire prevention and protection requirements in 29 CFR 1910.252(b). IMTT- Geismar failed to develop and implement safe work practices to provide for the control of hazards when performing operations on equipment requiring a hot work permit. Specifically, hot work permits are required by 29 CFR 1910.252(b) to have a

fire watch remain on the job site 30 minutes after work and inspection are complete. The IMTT- Geismar hot work permits failed to include the time in which the fire watch signed off stating they remained on site for at least 30 minutes after the hot work had been completed **[AOC 13 – 68.85(b)]**. IMTT- Geismar self-identified this area of concern prior to EPA’s arrival and has ordered new permits to address this issue.

IMTT- Geismar Job Safety Analysis (“JSA”) policy states completed JSA forms associated with a permit must be retained with the associated work permit for one year after the JSA is returned. The facility JSA policy also mentions that contractors using their own JSA must follow their own JSA program which at minimum meets the IMTT’s JSA policy requirements of completing the JSA form and returning to the permit issuer at the completion of the shift. EPA identified 2 hot work permits in January of 2025 with incomplete JSA’s attached **[AOC 6- 68.69(a)]**.

40 C.F.R. § 68.87 Contractors – IMTT- Geismar uses contractors to supplement its workforce as needed. The facility has procedures in place to ensure that contractors perform their work in a safe manner and are aware of the procedures to take during an emergency. This is accomplished by providing contractors with a process overview, information about safety and health hazards, emergency response plan requirements, and safe work practices.

IMTT- Geismar utilizes ISNetworld for the selection of contractors, who are required to go through a screening process, meeting the training credential qualifications outlined by the facility and receive a grade prior to selection. IMTT- Geismar reports any contractor performance issues to ISNetworld. IMTT- Geismar performs an evaluation of contractors annually through their internal Purchasing Order system and ISNetworld.

Subpart E – Emergency Response

40 C.F.R. § 68.90 Applicability – IMTT- Geismar is a responding stationary source in case of an accidental release of a regulated substance.

40 C.F.R. § 68.93 Emergency response coordination activities – IMTT- Geismar coordinated response needs with local emergency planning and response organizations for 2022 & 2024 but failed to provide documentation that indicated response needs were coordinated in 2023 **[AOC 14-68.93(a)]**. IMTT- Geismar is a member of the local Community Awareness Emergency Response (CAER) committee, that also provides aid to other local facilities.

40 C.F.R. § 68.95 Emergency Response Program – IMTT- Geismar maintains a written Emergency Response Plan (ERP), which aims to protect employees, public health, and the environment. The purpose of the ERP is to minimize potential adverse impacts on the facility and surrounding areas during an emergency situation. The plan consists of procedures for responding to emergencies such as fires, explosions, hazardous gas or liquid releases and natural disasters. The plan addresses all aspects of emergency response including coordination with mutual aid organizations, timely notification of

authorities, maintenance of proper documentation, and guidelines for compliance with applicable government regulations.

EPA reviewed the ERP which included procedures and measures for emergency response after an accidental release of a regulated substance. IMTT- Geismar currently has on site portable fire extinguishers and foam units, fire hydrants with monitors, a rescue truck with rescue equipment, and a loop system that supplies water (from a half million-gallon tank supplied from BASF) throughout the facility for emergency response capability. IMTT- Geismar also utilizes spill response kits, SCBA's and Level A suits throughout the facility. IMTT- Geismar utilizes an audible horn and PA system in the event of an emergency, which is tested weekly. The facility trained operators and maintenance employees who voluntarily trained in industrial firefighting, medical first responder, Hazmat tech and confined space and high angle rescue. Each shift has five (5) members of the Emergency Response Team so that each shift contains an operational team able to respond to situations. Contractors inspect and maintain a majority of the response equipment annually.

The Emergency Response Plan contains emergency notification procedures and telephone numbers for the local fire district and other agency contacts.

EPA reviewed the facility's ERP and noted it did not include procedures for inspection, testing, maintenance, or the use of emergency response equipment. IMTT- Geismar's ERP states internal weekly tests of the emergency alarm will be conducted but were missing 10 weeks of tests between 2022-2025 **[AOC 15- 68.95(a)(2)]**.

By December 19, 2024, and annually thereafter, facilities are responsible for conducting a notification exercise of the stationary source's emergency response notification mechanisms required under § 68.90(b)(3) or § 68.95(a)(1)(i). IMTT- Geismar failed to perform the annual emergency response notification mechanism by December 19, 2024 **[AOC 16- 68.96(a)]**.

Subpart G – Risk Management Plan

40 C.F.R. § 68.150 Submission – IMTT- Geismar submitted their 5-year update to their RMP on January 12, 2024. The re-submission was within the 5-year timeframe as required by 40 C.F.R. § 68.150.

40 C.F.R. § 68.160 Registration – IMTT- Geismar included in their RMP all regulated substances present at the site above their designate threshold quantity as required by 40 C.F.R. § 68.160.

40 C.F.R. § 68.190 Updates – IMTT- Geismar's RMP submittal was on January 12, 2024, and the previous submittal for this facility was on June 18, 2021.

40 C.F.R. § 68.195 Required Corrections- IMTT- Geismar failed to correct the RMP to include new accident history information when an HCL vapor cloud formed and went offsite to the neighboring facility. The vapor cloud was due to a weld seam and tank wall that was compromised due to contact with the HCL. A shelter in place was initiated for this event **[AOC 17- 68.195(a)]**.

Clean Air Act (CAA) §112(r)(1) – General Duty Clause

Purpose and General Duty - to identify hazards which may result from such releases using appropriate hazard assessment techniques, to design and maintain a safe facility taking such steps as are necessary to prevent releases, and to minimize the consequences of accidental releases which do occur.

IMTT- Geismar failed to design and maintain a safe facility taking such steps as are necessary to prevent the release of hazardous substances such as Dimethylamine (DMA), Propylene Oxide (PO) and Toluene Diisocyanate (TDI). **[AOC 18 - CAA Section 112(r)(1) - General Duty Clause]**

SECTION III - AREAS OF CONCERN

AOC 1- 40 C.F.R. §68.30(a)& (d) Hazard Assessment- Defining offsite impacts-

(a)The owner or operator shall estimate in the RMP the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in § 68.22(a). (d) Level of accuracy. Population shall be estimated to two significant digits.

IMTT- Geismar failed to have the correct distance to endpoint and the correct population estimate submitted in their January 12, 2024, RMP submittal. Discrepancies were noted between the RMP submittal and the documents provided on site for the toxics worst case scenario of PO, toxic alternate release scenario of PO, flammable worst case scenario of DMA and flammable alternative release scenario of DMA.

AOC 2- 40 C.F.R. §68.65(d)(1)(ii) Process Safety Information

(d)Information pertaining to the equipment in the process (1) Information pertaining to the equipment in the process shall include: (ii)Piping and instrument diagrams (P&ID's)

The EPA inspection team identified inconsistencies between P&IDs and equipment observed during the field inspection. P&ID # 4700-PA-001 indicated car seals in the open position upstream from pump 4701B and 4701A. The EPA inspection team identified car seals were present but were hanging freely, not holding any valves open. The facility corrected this deficiency while EPA was on site. The Facility failed to maintain accurate PSI and did not ensure that its P&IDs are accurate and up to date in accordance with 40 CFR § 68.65(d)(1)(ii).

AOC 3- 40 C.F.R. §68.65(d)(2) Process Safety Information

(d)(2) The owner or operator shall document that equipment complies with recognized and generally accepted good engineering practices.

IMTT- Geismar failed to ensure that the process equipment and piping were labeled, or color coded to indicate contents, direction of flow, and potential hazards, per ASME standard A13.1(2023). The inspection team identified RMP process equipment and piping associated with the TDI, DMA and PO covered process areas that were not labeled, or color coded to indicate contents, direction of flow and potential hazards, per ASME standard A13.1(2023). As a result, this equipment does not conform with RAGAGEP pursuant to 40 CFR §68.65(d)(2).

AOC 4- 40 C.F.R. §68.67(c)(1)- Process Hazard Analysis

(c)The process hazard analysis shall address: (1) The hazards of the process.

IMTT- Geismar failed to address the hazards of the process for node 5 in the 2021 PHA Revalidation for TDI. The 2021 TDI PHA Revalidation covered 5 nodes over a period of 6 sessions (March 29, March 30, March 31, April 1, April 6 & April 7, 2021) to include the hazards of the process. The session notes did not show that Node 5 was covered in any of the sessions.

AOC 5- 40 C.F.R. §68.67(d) & 68.83(b) Process Hazard Analysis & Employee Participation

68.67(d) The process hazard analysis shall be performed by a team with expertise in engineering and process operations, and the team shall include at least one employee who has experience and knowledge specific to the process being evaluated. Also, one member of the team must be knowledgeable in the specific process hazard analysis methodology being used. 68.83(b) The owner or operator shall consult with employees and their representatives on the conduct and development of process hazards analyses and on the development of the other elements of process safety management in this part.

IMTT- Geismar failed to include a Propylene Oxide (PO) terminal operator on the PHA team for the 2021 PHA revalidation. The facility's PHA policy also states in section 3.2.2 that the PHA revalidation team must include "Terminal Operators experienced and knowledgeable in the process area being evaluated."

AOC 6- 40 C.F.R. §68.69(a) Operating Procedures

The owner or operator shall develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information and shall address at least the following elements. (1) Steps for each operating phase: (iv) Emergency shutdown including the conditions under which emergency shutdown is required, and the assignment of shutdown responsibility to qualified operators to ensure that emergency shutdown is executed in a safe and timely manner. (2) Operating limits (i) Consequences of deviation (ii) steps required to correct or avoid deviation. (3) Safety and Health Considerations (i) Properties of, and hazards presented by, the chemicals used in the process; (ii) Precautions necessary to prevent exposure, including engineering controls, administrative controls, and personal protective equipment; (v) Any special or unique hazards.

- IMTT- Geismar failed to develop and implement written operating procedures that provide conditions under which emergency shutdown is required for the following procedures, including but not limited to:
 - IMTT-GE-SOP-1013
 - IMTT-GE-SOP-5043
- IMTT- Geismar failed to develop and implement written operating procedures that provide consequences of deviation and steps required to correct or avoid deviation for the following procedures, including but not limited to:
 - IMTT-GE-SOP-5071
 - IMTT-GE-SOP-5084

- IMTT-GE-SOP-5099
- IMTT- Geismar failed to develop and implement written operating procedures that provide the proper safety and health considerations or precautions necessary to prevent exposure for the following procedures, including but not limited to:
 - IMTT-GE-SOP-1023
 - IMTT-GE-SOP-5044
 - IMTT-GE-SOP-5057
- IMTT- Geismar failed to implement the IMTT- Geismar Job Safety Analysis (JSA) procedure by failing include a completed JSA with the following completed hot work permits, including but not limited to:
 - 33065
 - 33021

Section 9.2 of the facility JSA policy states completed JSA forms associated with a permit must be retained with the associated permit to work for one year after the JSA is returned. The JSA policy also mentions that contractors using their own JSA must follow their own JSA program which at minimum meets the IMTT's JSA policy requirements of completing the JSA form and returning to the permit issuer at the completion of the shift. The JSA's were missing supervisor signatures and supervisor walk through signatures indicating the job had been completed.

- IMTT- Geismar failed to develop and implement operating procedures for an incident that occurred on 11/11/2024 when a load valve was only open approximately 10-15% due to a high-level switch not inserted, allowing TDI to vent to the atmosphere. It was noted a contractor did not follow loading procedure.

AOC 7- 40 C.F.R. §68.69(c) Operating Procedures

The operating procedures shall be reviewed as often as necessary to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to stationary sources. The owner or operator shall certify annually that these operating procedures are current and accurate.

IMTT- Geismar failed to certify operating procedures on an annual basis for the following operating procedures listed below. This finding was also noted in the 2022 third party compliance audit, including but not limited to:

- IMTT-GE-SOP-1013- 2022 annual certification not provided
- IMTT-GE-SOP-5043- 2023 annual certification not provided
- IMTT-GE-SOP-5044- 2020 and 2023 annual certification not provided
- IMTT-GE-SOP-5049- 2020 and 2023 annual certification not provided
- IMTT-GE-SOP-5057- 2020 and 2023 annual certification not provided
- IMTT-GE-SOP-5059- 2020 and 2023 annual certification not provided
- IMTT-GE-SOP-5071- 2022 and 2023 annual certification not provided
- IMTT-GE-SOP-5072- 2023 annual certification not provided

- IMTT-GE-SOP-5073- 2023 annual certification not provided
- IMTT-GE-SOP-5080- 2020 and 2023 annual certification not provided
- IMTT-GE-SOP-5084- 2020 and 2023 annual certification not provided
- IMTT-GE-SOP-5096-2023 annual certification not provided
- IMTT-GE-SOP-5099- 2022 and 2023 annual certification not provided

AOC 8- 40 C.F.R. §68.71(a) & (c) – Training

(a)Initial training. (1) Each employee presently involved in operating a process, and each employee before being involved in operating a newly assigned process, shall be trained in an overview of the process and in the operating procedures as specified in § 68.69. The training shall include emphasis on the specific safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks. (c)Training documentation. The owner or operator shall ascertain that each employee involved in operating a process has received and understood the training required by this paragraph. The owner or operator shall prepare a record which contains the identity of the employee, the date of training, and the means used to verify that the employee understood the training.

IMTT- Geismar failed to maintain initial training records for three (3) operators and maintenance employees. That facility stated that due to the length of employment, some initial training records were lost. However, the facility created a certified statement that notes if employees received their initial training. This statement was not provided for these employees.

AOC 9- 40 C.F.R. §68.71(b) – Training

(b) Refresher training. Refresher training shall be provided at least every three years, and more often if necessary, to each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process. The owner or operator, in consultation with the employees involved in operating the process, shall determine the appropriate frequency of refresher training.

IMTT- Geismar failed to consult with the employees involved in operating the process on the appropriate frequency of refresher training. The facility provided a form that should be given to employees at the time of training. However, the form was not being utilized.

AOC 10- 40 C.F.R. §68.73(c) – Mechanical Integrity-Training

Training for process maintenance activities. The owner or operator shall train each employee involved in maintaining the on-going integrity of process equipment in an overview of that process and its hazards and in the procedures applicable to the employee's job tasks to assure that the employee can perform the job tasks in a safe manner.

IMTT- Geismar failed to train maintenance employees in an overview of the process and in the operating procedures relative to each covered process. The facility has procedures for maintenance activities in place but was unable to provide documentation indicating the maintenance personnel are trained on these procedures.

AOC 11- 40 C.F.R. §68.79(d) – Compliance Audits

(d) The owner or operator shall promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected.

IMTT- Geismar failed to promptly determine and document an appropriate response to each of the findings and document that deficiencies have been corrected for the compliance audit conducted in 2019. Responses to the findings were missing, there was no indication when tasks had been completed, no personnel assigned to tasks and no comments indicating how compliance was achieved for each finding. I found no areas of concern with the compliance audit conducted in 2022.

AOC 12- 40 C.F.R. §68.81(b) – Incident Investigation

(b) An incident investigation shall be initiated as promptly as possible, but not later than 48 hours following the incident.

IMTT- Geismar failed to initiate incident investigations within 48 hours following the incident, for incidents including but not limited to:

- Record 5159
- Record 3345
- Record 3284
- Record 2970
- Record 2806

The IMTT-Geismar incident investigation policy, Section 4.3.1. states “This initial documentation must be started as soon as reasonably possible after the incident but at a minimum prior to the end of the workday or work shift.”

AOC 13- 40 C.F.R. §68.85(b) – Hot work permits

(b) The permit shall document that the fire prevention and protection requirements in 29 CFR 1910.252(a) have been implemented prior to beginning the hot work operations; it shall indicate the date(s) authorized for hot work; and identify the object on which hot work is to be performed. 29 CFR 1910.252(a) states a fire watch shall be maintained for at least a half hour after completion of welding or cutting operations to detect and extinguish possible smoldering fires.

IMTT-Geismar failed to include the time in which the fire watch remains on site on the hot work permits, to ensure the fire watch remains on site for a half hour after the hot work is completed. Permits identified as needing a fire watch and missing a time signed out included but is not limited to permits 32896, 33075, 33065, 32562, 33021 & 33037. IMTT- Geismar ordered new hot work permits prior to EPA's arrival to address this concern.

AOC 14- 40 C.F.R. §68.93(a) – Emergency Response

The owner or operator of a stationary source shall coordinate response needs with local emergency planning and response organizations to determine how the stationary source is addressed in the community emergency response plan and to ensure that local response organizations are aware of the regulated substances at the stationary source, their quantities, the risks presented by covered processes, and the resources and capabilities at the stationary source to respond to an accidental release of a

regulated substance. (a) Coordination shall occur at least annually, and more frequently, if necessary, to address changes: At the stationary source; in the stationary source's emergency response and/or emergency action plan; and/or in the community emergency response plan. (b) Coordination shall include providing to the local emergency planning and response organizations: The stationary source's emergency response plan if one exists; emergency action plan; updated emergency contact information; and other information necessary for developing and implementing the local emergency response plan. For responding stationary sources, coordination shall also include consulting with local emergency response officials to establish appropriate schedules and plans for field and tabletop exercises required under § 68.96(b). The owner or operator shall request an opportunity to meet with the local emergency planning committee (or equivalent) and/or local fire department as appropriate to review and discuss those materials. (c) The owner or operator shall document coordination with local authorities, including: The names of individuals involved and their contact information (phone number, email address, and organizational affiliations); dates of coordination activities; and nature of coordination activities.

IMTT- Geismar failed to provide documentation that indicated response needs were coordinated with local emergency planning and response organizations for 2023. The facility was able to provide documentation for 2022 and 2024.

AOC 15- 40 C.F.R. §68.95(a)(2) – Emergency Response

(a) The owner or operator shall develop and implement an emergency response program for the purpose of protecting public health and the environment. Such program shall include the following elements: (2) Procedures for the use of emergency response equipment and for its inspection, testing, and maintenance;

- IMTT- Geismar failed to develop and implement an emergency response program that includes procedures for the use of emergency response equipment and for its inspection, testing and maintenance.
- IMTT- Geismar's ERP section 4.2.4 states internal weekly tests of the emergency alarm will be conducted. The facility failed to conduct weekly tests of the emergency alarm system on 2/1/2023, 11/1/23, 11/8/23, 11/15/23, 11/22/23, 11/29/23, 12/6/23, 12/13/23, 12/20/23, 9/11/24.

AOC 16 - 40 C.F.R. §68.96(a) – Emergency Response Exercises

(a) Notification exercises. At least once each calendar year, the owner or operator of a stationary source with any Program 2 or Program 3 process shall conduct an exercise of the stationary source's emergency response notification mechanisms required under § 68.90(b)(3) or § 68.95(a)(1)(i), as appropriate, before December 19, 2024, and annually thereafter. Owners or operators of responding stationary sources may perform the notification exercise as part of the tabletop and field exercises required in paragraph (b) of this section. The owner/operator shall maintain a written record of each notification exercise conducted over the last five years.

IMTT- Geismar failed to perform the annual emergency response notification mechanism by December 19, 2024.

AOC 17- 40 C.F.R. §68.195(a) – Required Corrections

The owner or operator of a stationary source for which a RMP was submitted shall correct the RMP as follows: (a) New accident history information—For any accidental release meeting the five-year accident history reporting criteria of § 68.42 and occurring after April 9, 2004, the owner or operator shall submit the data required under §§ 68.168, 68.170(j), and 68.175(l) with respect to that accident within six months of the release or by the time the RMP is updated under § 68.190, whichever is earlier.

IMTT- Geismar failed to correct the RMP to include new accident history information when an HCL vapor cloud formed and went offsite to the neighboring facility. The vapor cloud was due to a weld seam and tank wall that was compromised due to contact with the HCL. A shelter in place was initiated for this event.

AOC 18 - Clean Air Act (CAA) §112(r)(1) – General Duty Clause: *Purpose and General Duty - to identify hazards which may result from such releases using appropriate hazard assessment techniques, to design and maintain a safe facility taking such steps as are necessary to prevent releases, and to minimize the consequences of accidental releases which do occur.*

- IMTT- Geismar failed to design and maintain a safe facility when employees crossed a cordoned off area of TDI in the drumming facility without the proper PPE. The area was noted to have higher than normal and acceptable vapors of TDI due to the failure of the drum seams. Two days later, another incident occurred involving the leaking drums. Employees had overloaded a tractor trailer with the leaking drums, causing the trailer to collapse and release approximately 1,000 lbs. of TDI to the ground. Another release occurred when the forklift operator punctured the drums while trying to unload the collapsed trailer.
- IMTT- Geismar failed to design and maintain a safe facility when a HCL vapor cloud formed and went offsite due to overloading a railcar during loading activities on December 18, 2020. An employee at the neighboring facility encountered the vapor cloud and had to receive medical attention.
- IMTT- Geismar failed to design and maintain a safe facility when an operator noted HCL vapors forming around the truck rack due to an open bucket used to leave the loading Marty plug in between uses on July 12, 2023. The bucket, normally filled with water, accumulated enough HCL to form a vapor cloud.
- IMTT- Geismar failed to design and maintain a safe facility when EPA noted on the facility tour that TDI from the truck loading station is not contained on the second story of the station and consistently dropping product through the grating below the second story. The TDI is making contact with equipment and possibly any employee or contractor who stands below the second story. MDI and TDI are both loaded from the same truck loading station. MDI and TDI have potential health effects that may result from exposures.

At the conclusion of this RMP inspection, I conducted a closing conference at IMTT- Geismar at 3:00 PM on April 10, 2025, for the inspection. During the closing conference, I explained the EPA inspection report process. At the time of this closing conference, I identified ten (10) areas of concern. Additionally,

AOCs 4, 6, 8, 9, 10, 12, & 17 were determined after the conclusion of the inspection and were not included in the closing conference.

Section IV – FOLLOW UP

I requested supplemental documentation be downloaded to the EPA designated SharePoint site for review in which the facility did provide on April 14, 2025.

The Clean Air Act 42 U.S.C. Section 114(a)(2)(A) / Clean Air Act 42 U.S.C. Section 114(a)(2)(B)” CAA 42 U.S.C. Section 114(a)(2)(A) grants a representative authorized by the Administrator, upon presentation of credentials, the right of entry to, upon, or through any premises of such person on in which any records required to be maintained are located. Under CAA U.S.C. Section 114(a)(2)(B) the authorized representative may at reasonable times have access to and copy any records, inspect any equipment or method and sample any emission required to be sampled under CAA 42 U.S.C 7414(a)(1).”

Section V – LIST OF APPENDICES

The Appendices are not included in the online published inspection report. CBI Appendices include documents that are claimed CBI by the facility. Sensitive Appendices may include appendices that will not be posted but are not explicitly CBI. These could include Personally Identifiable Information (PII) or Homeland Security sensitive information.

Attachment 1—Opening and closing conference sign-in sheets