

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	February 10-14, 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:	CF Industries Nitrogen, LLC	
Facility Name:	CF Industries Donaldsonville Nitrogen Complex	
Facility Physical Location:	39018 Highway 3089	
(city, state, zip code)	Donaldsonville, LA 70346	
Mailing address:	P.O. Box 468	
(city, state, zip code)	Donaldsonville, LA 70346	
County/Parish:	Ascension Parish	
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FRS Number:	110014466372	
Identification/Permit Number:	1000 0012 6446	
Media Identifier Number:	RMP 1000106020	
NAICS:	325311 Nitrogenous Fertilizer Manufacturing	
SIC:		
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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 CF Industries Donaldsonville Nitrogen Complex Facility (“CFI”), operated by CF Industries Nitrogen, LLC., in Donaldsonville, Louisiana at 8:00 AM on February 10, 2025, for an announced inspection. EPA and Louisiana Department of Environmental Quality (“LDEQ”) inspectors met with Laura Durst (Process Safety Superintendent), Morris Johnson (General Manager) and their Environmental and Process Safety Team at the opening conference. I presented my credentials to Laura Durst, Morris Johnson 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

CFI is located at 39018 Highway 3089, Donaldsonville, Louisiana 70346. The facility is in operation 24 hours a day, seven days a week and has approximately 578 employees at the Donaldsonville location. The facility start-up of the first ammonia plant began in 1966, following 5 other ammonia plants installed between 1967 and 2016. The facility also contains 5 urea plants, 4 nitric acid plants, 3 Urea Ammonium Nitrate (“UAN”) plants, and one Diesel Exhaust Fluid (“DEF”) unit installed between 1973 to 2021. The facility utilizes pipeline, ship, barge, rail and truck modes of shipping material on and offsite. The facility is currently working on Green (ammonia produced using renewable energy sources) and Blue (ammonia produced from fossil fuels/low carbon alternative) Ammonia expansion projects. The Green ammonia expansion project is North America’s first commercial scale Green ammonia project. The alkaline water electrolysis unit will generate green hydrogen and enable the site to produce up to 20,000 tons of green ammonia annually. The Blue ammonia expansion project is for carbon dioxide (“CO₂”) dehydration and compression.

The facility stores more than a threshold quantity for Risk Management Plan (“RMP”) regulated substances of ammonia and flammable gas mixtures- synthesis gas and natural gas.

CFI reported fifteen (15) Program Level 3 covered processes subject to the requirements of EPA’s RMP regulations in its most recent RMP submission, dated January 24, 2024, which include six (6) covered ammonia plants, five (5) covered urea plants and four (4) covered nitric acid plants. The facility plans to have one (1) covered green hydrogen unit and one (1) carbon capture unit in the near future.

The EPA inspection team focused on the Ammonia 1 & 2 units for records including but not limited to mechanical integrity, training, and process safety information (“PSI”). Some documents reviewed contain information from other units on site were reviewed as necessary.

PROCESS DESCRIPTION

The Donaldsonville Nitrogen Complex produces the nitrogen-based compounds ammonia, granular urea, and urea ammonium nitrate (UAN). Production starts with the manufacture of ammonia. Ammonia is used to produce urea, nitric acid, and ammonium nitrate (AN). Urea solution and ammonium nitrate are mixed to form UAN solution. All the ammonia plants are interconnected via a CO₂ header. Current production capacity is 4.5 MM tons per year (tpy) of ammonia, 4.1 MM tpy of urea and DEF, and 4.5 MM tpy of UAN.

Ammonia Production

Ammonia is formed from air, water, and natural gas in a series of process steps. Initially, air is filtered and compressed to 600 psig., water is clarified and demineralized, and natural gas is desulfurized. Steam and natural gas are reformed in a catalytic reactor furnace to hydrogen and carbon oxides (1500°F, 500 psig., nickel catalyst). Unreacted gases go to the secondary reformer, compressed air is added, and further reaction occurs.

The reformed gases are purified by high and low temperature shift converters, which lower carbon monoxide (“CO”) levels and generate more hydrogen by converting CO to CO₂. The CO₂ is removed from the process gas in an absorber column by passing it through an alkanol amine solution. Trace quantities of carbon oxides are reacted to methane in the methanator. Steam strippers remove CO₂ from the alkanol amine solution. About 70% of the CO₂ produced in the ammonia plants is used as feed for urea production; the rest is vented.

The purified process gas, a 3-to-1 mixture of hydrogen and nitrogen known as synthesis gas (Syngas), is compressed to 2,300 psig by a steam-driven centrifugal compressor and circulated through an ammonia converter. Approximately 13% of syn gas reacts to form ammonia. A refrigeration system condenses the ammonia out of the synthesis loop gas stream that is then recycled. A “warm” ammonia stream (56°F) is sent as feed material to the urea, nitric acid, and UAN production units or to the product pipeline. A “cold” ammonia liquid (-28°F) is sent to storage.

The Low-Pressure Purge Gas Recovery Unit (LPPGRU) removes ammonia from the low-pressure purge gas streams and used as fuel in the ammonia plant reformers. Recovered ammonia is recycled, reducing the amount combusted. This recycled ammonia reduces the average Nitrogen Oxide (“NO_x”) emitted from the reformer stack from 500 ppm to 150 ppm.

Ammonia process condensate is steam-stripped to meet effluent standards. Prior to 1986, stripper overhead streams were added to flue gas for Ammonia Plants Nos. 3 & 4 reformers. Stripper overhead streams are now condensed, with noncondensibles venting to the reformer stacks and condensed liquids routing to a condensate surge drum prior to recycle through a KTI feed saturator unit into the feedstock for Ammonia Plant Nos. 1 & 2.

Ammonia Production Units 1-5 produce ammonia using the Kellogg Process, and Ammonia 6 uses technology provided by ThyssenKrupp Uhde. All use ingredients common in the environment: natural gas, air, and water. Under high temperature and in the presence of a catalyst, the substances react to form a gas stream consisting primarily of hydrogen, nitrogen, carbon monoxide, carbon dioxide, and other gases. Using a series of catalysts and chemical solutions, all gases are removed except for nitrogen and hydrogen. The commingled nitrogen and hydrogen, called syn gas, is then brought in contact with another catalyst under high pressure. The synthesis gas reacts to form ammonia gas. The ammonia gas is then condensed to a liquid using a refrigeration machine.

Urea Production

Urea, manufactured from ammonia and CO₂, can be granulated to produce a solid fertilizer or left in solution to be used as feed in UAN production. Liquid ammonia and gaseous CO₂ are mixed at 2,200 psig in a condenser to form ammonium carbamate that is sent to a reactor where half is converted to urea and water. Ammonia and CO₂ are produced from the unconverted carbamate in a high-pressure stripper and routed back to the condenser along with make-up ammonia, CO₂, and ammonium carbamate solution recycled from the high-pressure scrubber.

Urea solution from the stripper flows to the rectifying column. Ammonia and CO₂ are removed from the urea solution. Water is removed from the purified urea solution by vacuum evaporation to produce a concentrated urea melt.

Granular Urea Production

In Urea Plant Nos. 1, 2 & 4, the concentrated urea melt goes through a granulization step. Urea-formaldehyde concentrate additive (“UF-85”), is injected into the molten urea prior to granulation, reacting to make the solid product dust free.

In Urea Plant Nos. 1 & 2, urea melt is sprayed inside granulation drums onto a moving bed of urea granules. The granules are removed, screened to the desired size, and conveyed to a urea bulk warehouse. Cooling air from the granulation drums is passed through scrubbers before venting.

In Urea Plant No. 4, urea melt is sprayed inside the granulator onto a fluidized bed of urea granules. Granules are removed, screened to the desired size, cooled, and stored in a urea bulk warehouse. Fluidization air from the granulator and cooling air are scrubbed before venting.

Emissions associated with the granular urea production include natural gas combustion emissions from the plant boiler, ammonia emissions from a low-pressure absorber, and process discharge to the urea stack. Ammonia emissions, along with particulate emissions, are released from the granulator scrubbers. Scrubber water is recycled to the process. Formaldehyde emissions from the UF-85 Tanks are scrubbed before venting. The effluent liquid is recycled with the granulator solution.

Hydrogen contamination is removed from CO₂ feedstock for all Urea Plants by the catalytic reaction of hydrogen and oxygen to form water. This reduces the gas load, primarily hydrogen and nitrogen, to the control equipment and allows greater contact between the ammonia vented along with these gases and the scrubbing medium. More ammonia is therefore removed.

Urea Solution Production

Urea Plant No. 3 has no granulation capability. It supplies the urea solution for UAN production. Urea solution for UAN production is also obtained, prior to the granulation step, from Urea Plant No. 4 and No. 6 and can be obtained from Urea Plant No. 2. Process steps in the plants are the same up to the evaporation step of granulation. Urea solution is processed through a flash tank, then directed to the UAN mix tank.

Urea Plant No. 3 vent gases from the urea reactor and the urea solution flash tank are fed to the urea ammonium nitrate ("UAN") unit to provide the ammonia feed for the neutralizer and lower ammonia emissions from the urea solution process.

Urea Ammonium Nitrate ("UAN") Production

UAN production starts by making nitric acid from ammonia, air and water. The nitric acid is reacted with ammonia to form AN. AN is then combined with urea solution to form urea ammonium nitrate.

Nitric Acid ("HNO₃") Production

Production of HNO₃ is initiated by converting anhydrous ammonia to a vapor at 150°F. Compressed air and gaseous ammonia are mixed and reacted over a platinum-rhodium gauze at 1625°F to produce NO_x. The NO_x gas is cooled in the waste heat boiler and sent to the absorption tower, where it is absorbed in water to produce HNO₃.

Nitric Acid Plant Nos. 1, 3, & 4 are dual pressure processes. NO_x is produced at 60 psig., and the acid reactions in the absorption tower take place at 160 psig. Nitric Acid Plant No. 2 employs a single pressure process. The air and gaseous ammonia streams are reacted, and the resultant NO_x is absorbed at a pressure of about 130 psig. Plant No. 1 absorber provides NO_x abatement through extended absorption. Catalytic abatement units are utilized to reduce NO_x emissions from the Plant No. 2, 3, & 4 absorbers.

AN/UAN Production

AN is generated by combining nitric acid and ammonia feed in a neutralizer. In the UAN No. 1 Plant, vent gases from the urea reactor and the urea solution flash tank of Urea plant No. 3 provide the ammonia feed to the ammonium nitrate neutralizer. After reaction, the AN solution flows into the UAN mixing tank with urea solution and forms UAN. The UAN solution is cooled, adjusted for optimum pH, and pumped to storage.

Section II - OBSERVATIONS

The documentation review began onsite with the CF Industries Nitrogen, LLC 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, accompanied by facility representatives, to observe the facility process equipment, overall operations and major emission sources at the facility. Operators from the Ammonia 1 & 2 units assisted during the facility tour. The facility was in operation at the time of inspection. Inspectors did note unusual odors at the time of inspection. However, the facility had personnel inspect the areas with handheld monitors and were not able to detect a leak.

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

Subpart A – General

40 C.F.R. § 68.10 Applicability – CFI 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 – CFI submitted their most recent 5-year Risk Management Plan submission on July 13, 2023, with a voluntary update on January 24, 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: ammonia and flammable gas mixtures (synthesis gas and natural gas).

40 C.F.R. § 68.15 Management – CFI has developed a management system to oversee the implementation of the RMP Program elements. CFI 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. CFI 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 ammonia and flammable mixtures held in a covered process. CFI analyzed and reported a worse-case scenario for both chemicals in the RMP.

40 C.F.R. § 68.28(a) Alternative Worse-case Release Scenario Analysis – EPA reviewed the Offsite Consequence Analysis- Alternative release scenario for ammonia and flammable mixtures on site. CFI analyzed and reported an alternative release scenario for both chemicals in the RMP.

40 C.F.R. § 68.30 Defining offsite impacts-population – CFI used the most current census bureau population data available in January 2024 at the time of the RMP update.

40 C.F.R. § 68.33 Defining offsite impacts-environment – EPA reviewed the Offsite Consequence Analysis document with associated Marplot maps. CFI did not have any environmental receptors within a distance to endpoint, as required by § 68.22.

40 C.F.R. § 68.36 Review and update – CFI submitted their offsite consequence analysis with its RMP submission on January 24, 2024. The next 5-year offsite consequence analysis submission is due on July 13, 2028.

40 C.F.R. § 68.39 Documentation – CFI operates fifteen (15) RMP Program level 3 processes subject to this subpart and are 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 – CFI reported two accidental releases in their RMP submission on January 24, 2024. An accident that occurred on 12/1/2022 was originally included because there was a precautionary shelter in place (SIP) by the nearby school. The SIP was lifted as the fence line monitoring did not detect anything. The accident reported on 2/24/2021 involved a synthesis gas release that ignited. No injuries were reported as part of either incident.

Subpart D – Program 3 Prevention Program

40 C.F.R. § 68.65 Process safety information (PSI) – CFI 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. Departments within the facility are 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 has documented safety-related limits for specific process parameters (e.g., temperature, level, composition) in the operation manuals. CFI 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). CFI also maintains numerous technical documents that provide information about the design and construction of process equipment.

EPA reviewed the annual deluge system inspections conducted by a third-party contractor and noted the facility does not perform deluge inspections in each unit on an annual basis **[AOC 1 - 68.65(d)(2)]**.

The inspection team identified refinery process equipment and piping, 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 1 - 68.65(d)(2)]**.

EPA requested a list of relief devices with specific information as to where each device is located and the determination if the device is atmospheric in which CFI did not provide in enough time for EPA to review prior to meeting the 60-day timeline EPA is required to adhere by for this report submittal. Therefore, a review of the pressure relief devices could not be made at this time but will be made during the enforcement review.

40 C.F.R. § 68.67 Process hazard analysis (PHA) – CFI 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. CFI primarily uses the Hazard and Operability (HAZOP) and Layer of Protection Analysis (LOPA) techniques to perform these evaluations. These analyses are conducted using a team who has operating, maintenance, experience, and engineering expertise. This team identifies and evaluates hazards of the process as well as recommends accident prevention and/or mitigation measures when the team believes such measures are necessary. To ensure that the process controls and/or process hazards do not deviate significantly from the original design safety features, CFI

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 Information System (EMIS) where they are tracked to completion.

40 C.F.R. § 68.69 Operating procedures – CFI maintains written procedures that address various modes of process 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 (SOCL) 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. Procedures are maintained current by revising them as necessary and certified on an annual basis to reflect changes made to the process. In addition, the facility's operating procedures provide guidance on responding to events in which safe operating limits have been exceeded. 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, normal shutdown, and startup following a turnaround including corresponding SOCL's. CFI's operating procedures for the Ammonia 1 & 2 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 **[AOC 2 - 68.69(a)]**.

EPA reviewed several hot work permits for the month of September 2024 for all units. Hot work permits are required by 40 C.F.R. 68.69(d) to document the provisions in 29 CFR 1910.252A. And 29 CFR 1910.252A requires the facility to have a fire watch remain on site for 30 minutes after completion of hot work. Five hot work permits were identified as not having the appropriate fire watch signature **[AOC 3 - 68.69(d) & 68.85(b)]**.

40 C.F.R. § 68.71 Training – CFI 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. Operators are required to score a certain percentage on all tests, including retests. 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.

CFI 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. We reviewed the training records of six selected process operators in the Ammonia 1 & 2 units. CFI was able to provide initial and refresher training records for multiple employees addressing an overview of the process, operating procedures, Hazwoper, first responder, and fire brigade training. However, EPA noted scores on tests that were less

than the required passing score, missing dates on tests taken, and consultation of refresher training not provided **[AOC 4 - 68.71(a) & (c)]**.

CFI provided a form that documents the consultation on the frequency of refresher training for operators for the year of 2024. The facility verbally stated this is performed on an annual basis where the facility meets with operators for a two-day training for each shift where they go over safety topics and operating procedures. Of the six (6) operator training records reviewed, EPA identified eleven (11) trainings from 2021-2023 in which documentation of the consultation of refresher training was not provided **[AOC 5 - 68.71(b)]**.

40 C.F.R. § 68.73 Mechanical integrity (MI) – CFI 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 CFI 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).

CFI failed to ensure to perform ultrasonic and external inspections on High 1 piping circuits according to the CF mechanical integrity program schedule, Section 9.3 Inspection Frequency **[AOC 6 - 68.73(b)]**.

CFI failed to implement a deferral approval process for internal, external and ultrasonic testing inspection of pressure vessels and piping in accordance with API 510 and API 570 **[AOC 7 - 68.73(d)(2)]**.

CFI did not ensure that the frequency of inspections and tests on piping, tanks and pressure vessels were performed in accordance with API 570, API 653, and API 510 **[AOC 8 - 68.73(d)(3)]**.

CFI failed to correct deficiencies in equipment that are outside acceptable limits before further use or in a safe and timely manner when seventy-seven (77) mechanical integrity related inspection work requests were not marked as requiring a turnaround and were overdue for completion, as identified in the 2023 compliance audit. The audit also identified 3 pipe clamps that were not replaced during an available turnaround on the unit where they were installed **[AOC 9 - 68.73(e)]**.

CFI failed to ensure appropriate checks and inspections were being performed to assure that equipment is installed properly and consistent with design specifications and the manufacturer's instructions [AOC 10- 68.73(f)(2)].

40 C.F.R. § 68.75 Management of change (MOC) – CFI has a comprehensive 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) – CFI 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.

EPA reviewed CFI's written PSSR procedures, as well as various PSSRs completed by the facility within the past 5 years and found no areas of concern.

40 C.F.R. § 68.79 Compliance Audits – To ensure that the accident prevention program is functioning properly, CFI 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 CFI's most recent compliance audits, conducted in 2020 and 2023. All compliance audits provided were conducted by at least one person knowledgeable in the process. CFI assigns audit findings to the PSM department.

EPA reviewed the findings and recommendations to the compliance audits provided during the inspection. CFI presented to promptly determine and document an appropriate response to each of the findings and recommendations from the 2020 and 2023 PSM-RMP Audits, documenting that deficiencies have been corrected in EMIS.

40 C.F.R. § 68.81 Incident investigation – CFI is required to investigate each incident which resulted in, or could reasonably have resulted in, a catastrophic release of a regulated substance. CFI 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 Environmental Management Information System (EMIS) 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 EMIS within 48 hours of the

incident and undergo a formal root cause investigation led by the EH&S department. 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. CFI uses a root cause investigation methodology to identify probable causes, corrective actions or recommendations, and lessons learned. Recommendations are tracked in EMIS and may lead to development of action items in other systems, such as MOCs, training assignments, SOP modifications, and generated Work Orders.

A review of the LDEQ's Electronic Document Management System (EDMS) and the National Response Center (NRC) databases, CFI reported approximately ninety-eight (98) incidents since January 2021. EPA gathered 43 incident reports of interest to review. Multiple investigation reports were not initiated within 48 hours of the discovery of the incident, missing investigation start dates or had a root cause that could not be determined [AOC 11 - 68.81(b) & AOC 12 - 68.81(h)(2)].

40 C.F.R. § 68.83 Employee participation – Employees participate on PHA teams and have access to all HAZOP and LOPA information and recommendations. Operation manuals are developed, updated, and reviewed by Operations personnel and the Training Department. 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. CFI provided EPA with their written employee participation plan.

40 C.F.R. § 68.85 Hot Work Permit – CFI'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 Occupational Safety Supervisor. 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 has 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 CFI 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 September 2024 that required fire prevention and protection requirements in 29 CFR 1910.252(b). CFI 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. [AOC 3 – 68.69(d) & 68.85(b)].

40 C.F.R. § 68.87 Contractors – CFI 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.

CFI utilizes a third party contractor to manage contractor qualification, 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. CFI reports any contractor performance issues to the third party contractor. CFI performs an evaluation of contractors annually through their internal PO system and the third party contractor.

Subpart E – Emergency Response

40 C.F.R. § 68.90 Applicability – CFI 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 – CFI coordinates response needs with local emergency planning and response organizations. CFI is a member of the local Community Awareness Emergency Response (CAER) committee, that also provides aid to other local facilities. Meetings with Ascension Local Emergency Planning Committee (LEPC) and the parish Hazmat response team are coordinated on an annual basis as required by 40 C.F.R. § 68.93(a). CFI also performs tabletop drills on an annual basis and include the LEPC and the local fire department.

40 C.F.R. § 68.95 Emergency Response Program – CFI 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, natural disasters, and terrorist threats. 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. CFI currently has on site fire pumps, hose hoses and hose cabinets, portable fire extinguishers and foam units, fire hydrants with monitors and high rise monitors, a rescue truck with portable monitors and rescue equipment, portable foam trailer and foam generator, and a loop system that supplies water (from the Mississippi River) throughout the facility with jockey pumps and a pressure drop system for emergency response capability. CFI also utilizes spill response kits, SCBA's and Level A suits throughout the facility. CFI utilizes an audible horn and PA system and emergency phone communications via Everbridge in the event of an emergency, which is tested weekly. The facility has trained operators, loaders and maintenance employees who voluntarily trained in

industrial firefighting, medical first responder, Hazmat tech and confined space and high angle rescue. Each shift has a selected amount of 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, while the facility also provides weekly inspections of all equipment.

The Emergency Response Plan contains emergency notification procedures and telephone numbers for the local fire district and other agency contacts (e.g. Ascension Parish Hazmat Response Team).

EPA reviewed the facility's ERP and noted it did not include procedures for inspection, testing, maintenance, or the use of emergency response equipment. During the file review of the annual deluge system inspections from 2022-2024, we observed the facility does not perform annual inspections of the deluge system in each unit on an annual basis due to "the nature of the inspections and its impact on process equipment." Additionally, multiple reoccurring deficiencies were noted in the annual post indicator valve (PIV) inspections from 2022-2024.

CFI did not ensure that inspection and testing of emergency alarm activation from control rooms was being conducted and did not include ammonia and smoke sensors located in the HVAC intakes of designated SIP buildings in the calibration and testing program, as identified in the 2023 compliance audit.

Furthermore, EPA reviewed the facility's safety inspections on emergency response equipment in and around the facility that were provided. These inspections are intended to include 4-point shower and eye wash checks, 9-point fire extinguisher checks, fire hose equipment checks, container labeling, gas masks, escape packs, emergency lights, fire loop efficiency, fire monitor checks, dike checks, and oil checks in the diked areas. The form the facility is using to perform these inspections states "weekly", but the facility provided forms that had dates indicating the facility is performing the inspections monthly. **[AOC 13 -68.95(a)(2)]**

Subpart G – Risk Management Plan

40 C.F.R. § 68.150 Submission – CFI submitted their 5-year update to their RMP on July 13, 2023, and a voluntary update on January 24, 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 – CFI 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 – CFI's RMP submittal was on July 13, 2023, and the previous submittal for this facility was on June 17, 2021.

SECTION III - AREAS OF CONCERN

Piping circuit, procedure and equipment identification has been removed for confidential business information purposes.

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

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

i. CFI failed to document that the process is designed and maintained in compliance with recognized and generally accepted good engineering practices in accordance with NFPA 15 2022, Paragraph 12.5.1.

EPA reviewed the annual deluge system inspections conducted by a third-party contractor and noted the facility does not perform deluge inspections in each unit on an annual basis. CFI stated that due to the nature of the inspections and its impact on process equipment, inspections are only performed when the unit goes down during a turnaround. Annual inspections were provided for the Ammonia units on 8/29/2022, 6/11/2023, 9/18/2024, 10/02/2020 and 9/25/2023. The third-party contractor follows NFPA 15: Standard for Water Spray Fixed Systems for Fire Protection for the guidance on inspection and testing the facility's deluge system. NFPA 15 states flow tests should be conducted annually for active systems.

ii. CFI 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 refinery process equipment and piping in multiple areas of the facility 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 2 – 40 C.F.R. §68.69(a) Operating Procedures

(a) 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: Steps for each operating phase, operating limits, safety and health considerations & safety systems and their functions.

i. CFI failed to address the consequences of deviation and steps required to correct or avoid deviation in their operating procedures and SOCL's. PPE or hazards listed in the procedures were also inconsistent with the hazards of working with the process. Some procedures listed PPE wasn't required in areas where workers have the potential to be exposed to ammonia.

ii. CFI failed to develop and implement operating procedures when a release of ammonia and syn gas was discovered from an NO₂ outlet nozzle due to incorrect installation of a lip seal gasket. The root cause was determined to be the lack of a written procedure for quality assurance activities during lip seal gasket installation. Another incident with the same root cause occurred just 23 days later at the same location.

iii. CFI failed to develop and implement operating procedures when operators were trying to clear the piping on the primary sulfuric acid injection pumps, resulting in a plugged pressure gauge that injured 2 employees. The root cause was determined to be ineffective communication and implementation of a procedure as well as human/machine interface.

iv. The following procedures reviewed did not address consequences of deviation and steps required to correct or avoid deviation:

- 01.02.21	- 02.02.23	- 03.12.01
- 01.02.26	- 02.02.32	- 04.08
- 01.02.65	- 02.08.02	- 04.09
- 01.02.68	- 03.02.63	- 04.13
- 01.02.69	- 03.02.64	- General
- 01.02.75	- 03.02.65	- 02.10.01
- 01.06.01	- 03.02.74	- 03.10.01
- 01.06.03	- 03.02.79A	
- 01.06.06	- 03.02.79B	
- 01.11.02	- 03.11.01	

v. The following procedures reviewed had inconsistencies with safety and health considerations including PPE and hazards identified in the procedure:

- 01.06.01	- 03.10.01
- 01.06.03	- 02.10.01
- 02.08.02	- 03.12.01
- 03.02.64	- 03.11.01
- 03.02.65	- 03.02.79B
- 03.02.74	- 03.02.79A

vi. During a review of incident investigations conducted by the facility, EPA noted one incident where operators were attempting to fill a sulfuric acid day tank, resulting in a tank failure that injured 4 employees. After an inspection was performed on the tank, it was noted that buildup in the vent lines was the cause of the obstruction to a location of the wall already affected by corrosion, that caused the tank failure. The root cause on the incident report also indicated the procedure provided was incorrect.

AOC 3 – 40 C.F.R. §68.69(d) & 68.85(b) Operating Procedures & Hot Work Permits

(d) The owner or operator shall develop and implement safe work practices to provide for the control of hazards during operations such as lockout/tagout; confined space entry; opening process equipment or piping; and control over entrance into a stationary source by maintenance, contractor, laboratory, or other support personnel. These safe work practices shall apply to employees and contractor employees.

(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.

i. CFI 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.. The following permits reviewed that required a fire watch did not have a fire watch signature include but not limited to:

- Work order 965681
- Work order 965681
- Work order 965681
- Work order 953627

ii. While EPA was on site, CFI failed to develop and implement safe work practices to provide for the control of hazards when an incident occurred while preventative maintenance was being performed on the outlet of a new FES flash drum receiver. A thermal relief valve located in a routine maintenance area, contained ammonia that was released from the discharge side of the relief valve. When EPA asked if proper PPE was worn during this maintenance activity, it was verbally stated that the release was down wind of the personnel, and no PPE was required.

AOC 4 - 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.

(2) In lieu of initial training for those employees already involved in operating a process on June 21, 1999, an owner or operator may certify in writing that the employee has the required knowledge, skills, and abilities to safely carry out the duties and responsibilities as specified in the operating procedures.

(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.

CFI failed to properly train each employee involved in a process and identify the date of the training.

CFI operators undergo a series of training in multiple units prior to commencement of work throughout the facility. The operators are required to pass the test with an internally specified percentage. If failing the first time, a letter is written, and the operator will have to retest to get a passing grade. EPA reviewed initial and refresher training documentation for 6 random operators, whose names will not be identified in this report to maintain their privacy, in the two of the Ammonia units.

- Of the six (6) operators reviewed, two (2) had a failing score on recertification tests, with no proof of a retest.
- Of the six (6) operators reviewed, dates were missing on eight (8) of the tests taken (multiple certifications) from 2021 and 2023.

AOC 5 - 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.

CFI failed to consult with the employees involved in operating the process on the frequency of refresher training.

CFI provided the 2024 Annual refresher training report form. This form provides documentation of the consultation on the frequency of refresher training for operators. The facility verbally stated this is performed on an annual basis where the facility meets with operators for a two-day training for each shift where they go over safety topics and operating procedures. However, this form was not provided prior to 2024. Of the six (6) operator training records reviewed, EPA identified eleven (11) trainings from 2021-2023 in which documentation of the consultation of refresher training was not provided.

AOC 6 - 40 C.F.R. §68.73(b) Mechanical Integrity

(b) Written procedures. The owner or operator shall establish and implement written procedures to maintain the on-going integrity of process equipment.

CFI failed to establish and implement written procedures to maintain the on-going integrity of process equipment.

Seven piping circuits did not receive an ultrasonic inspection and test every 5 years for High 1 piping circuits and/or did not have an external inspection performed every 5-year in accordance with the CF mechanical integrity program schedule, Section 9.3 Inspection Frequency.

**Equipment names have been withheld from this report due to confidential business information.*

AOC 7 - 40 C.F.R. §68.73(d)(2) Mechanical Integrity

(d) Inspection and testing. (2) Inspection and testing procedures shall follow recognized and generally accepted good engineering practices.

i. CFI failed to implement a deferral approval process for internal inspection of pressure vessels which could not be completed within a 10-year interval accordance with API 510. Two pressure vessels were overdue for internal inspection and were operated beyond their due date without a deferral that was processed prior to the due date.

***API 510 6.7.3 Deferrals**

Deferral requests not meeting the conditions of a simplified deferral (6 months) above shall follow a documented deferral procedure/process that includes all of the following minimum requirements:

- a. Perform a documented risk-assessment or update an existing RBI assessment to determine if the proposed deferral date would increase risk above acceptable risk threshold levels as defined by the owner-operator.*
 - The risk assessment may include any of the following elements as deemed necessary by the owner-operator:*
 - 1) FFS analysis results;*
 - 2) consequence of failure;*
 - 3) applicable damage mechanism susceptibilities and rates of degradation;*
 - 4) calculated remaining life;*
 - 5) historical conditions/findings from inspections, tests, and examinations and their technical significance;*
 - 6) extent and/or probability of detection (i.e., effectiveness) of previous inspections, tests, or examinations as well as the amount of time that has elapsed since they were last performed;*
 - 7) considerations for any previous changes to inspection or test intervals (e.g., reductions in interval due to deteriorating conditions);*
 - 8) disposition(s) of any previous requests for deferral on the same pressure vessel or pressure-relieving device;*
 - 9) historical conditions/findings for pressure vessels or pressure-relieving devices in similar service if available;*
- b. Determine if the deferral requires the implementation of, or modification to, existing IOWs or operating process control limits;*
- c. Review the current inspection plan to determine if modifications are needed to support the deferral;*
- d. Obtain the consent and approval of appropriate pressure vessel personnel including the inspector representing or employed by the owner-operator and appropriate operations management representative(s);*
- e. Updates to the pressure vessel or Pressure Relief Device records with deferral documentation are complete before it is operated beyond the original due date.*

ii. CFI failed to implement the deferral approval process for external CUI and UT inspections of piping which could not be completed within a 5-year interval as specified in API 570. Five piping circuits were overdue for external and UT testing and were operated beyond their due date without a written justification.

iii. CFI failed to implement a deferral approval process for internal inspection of pressure vessels which could not be completed within a 10-year interval accordance with API 510. Eight pressure vessels were overdue for internal inspection and were operated beyond their due date without a valid deferral.

AOC 8 - 40 C.F.R. §68.73(d)(3) Mechanical Integrity-

(d) Inspection and testing. (3) The frequency of inspections and tests of process equipment shall be consistent with applicable manufacturers' recommendations and good engineering practices, and more frequently if determined to be necessary by prior operating experience.

- i. On or about May 1, 2023, and at times prior to, CFI did not ensure that baseline thickness readings were taken on new small bore process piping within 3 months of being placed into service consistent with applicable manufacturers' recommendations and good engineering practices (e.g. such as API-570) as identified in the 2023 compliance audit.
- ii. On or about May 1, 2023, and at times prior to, CFI did not ensure that monthly inspections of above ground storage tanks were performed and documented consistent with applicable manufacturers' recommendations and good engineering practices (e.g. such as API-653) as identified in the 2023 compliance audit.
- iii. CFI failed to perform external inspections or ultrasonic testing at five-year intervals on four piping circuits in accordance with API 570 Section 6.3.
- iv. CFI failed to perform internal inspections at 10-year intervals on thirteen pressure vessels in accordance with API 510.
- v. CFI failed to perform external inspections at 5-year intervals on one pressure vessel in accordance with API 510.

AOC 9 - 40 C.F.R. §68.73(e) Mechanical Integrity

(e) Equipment deficiencies. The owner or operator shall correct deficiencies in equipment that are outside acceptable limits (defined by the process safety information in [§ 68.65](#)) before further use or in a safe and timely manner when necessary means are taken to assure safe operation.

- i. On or about May 1, 2023, and at times prior to, there were seventy-seven (77) mechanical integrity related inspection work requests (IWRs) in APM that were not marked as requiring a turnaround and were overdue for completion (4 were due in 2020, 5 were due in 2022) as identified by the 2023 compliance audit.
- ii. On or about May 1, 2023, and at times prior to, there were 3 pipe clamps that were not replaced during an available turnaround on the unit where they were installed (Work orders 823512, 774494 and 840968) as identified by the 2023 compliance audit.

AOC 10 - 40 C.F.R. §68.73(f)(2) Quality Assurance

Appropriate checks and inspections shall be performed to assure that equipment is installed properly and consistent with design specifications and the manufacturer's instructions.

- i. CFI failed to maintain quality assurance when improper installation of a piping system that was installed with undocumented changes from the design drawings that were issued from construction caused a fire from a thermal relief valve.
- ii. CFI failed to maintain quality assurance by ensuring that thermal and atmospheric pressure relief valves relieve to a safe location in accordance with API 521. During the facility tour in the one of the Ammonia units, I observed a pressure relief valve in a routine maintenance area that was later identified by a facility engineer as being atmospheric relief.

- An incident that occurred in February 2024, due to a relief valve lifting during a reverse flow on a pump suction. It was determined that the thermal relief valve potentially discharges to an unsafe location and needs to be re-evaluated.

- iii. CFI failed to maintain quality assurance when a packing gland leak on a bleed valve that was seated incorrectly caused a fire from the bleed valve on an ammonia separator level column.

AOC 11 - 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.

CFI failed to initiate nine (9) incidents within 48 hours. Of the following forty-three (43) incident reports gathered by EPA to review, nine (9) incident investigations began 48 hours after the incident.

AOC 12 - 40 C.F.R. §68.81(h)(2) Incident Investigation

(h) The owner or operator shall ensure the following are addressed when the incident in paragraph (a) of this section meets the accident history reporting requirements under § 68.42:

(2) The report in paragraph (d) of this section shall include factors that contributed to the incident including the initiating event, direct and indirect contributing factors, and root causes. Root causes shall be determined by conducting an analysis for each incident using a recognized method.

An OSHA PSM and EPA RMP compliance audit conducted in September 2023 identified that incident reports often did not include a description of the factors that contributed to the incident, or a root cause was identified as "cannot be determined". No further information or context was provided during the inspection to explain why the root cause could not be determined.

Of the 43 incident reports gathered by EPA to review, CFI failed to include factors that contributed to the incident, direct and indirect, including root causes for four (4) incidents.

AOC 13 - 40 C.F.R. §68.95(a)(2) Emergency Response Program

(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.

CFI failed to develop and implement an emergency response program for the purpose of protecting public health and the environment.

i. EPA reviewed the facility's Emergency Response Plan (ERP). Emergency Response Equipment was included in Appendix J of the ERP but the plan did not include any procedures that outlined how the equipment would be maintained, what inspections would be performed or when these inspections would occur to maintain the equipment properly.

ii. EPA reviewed the facility's weekly safety inspections on emergency response equipment in and around the facility that were provided for two of the ammonia units. The form that the facility is using to perform these inspections states "weekly", but the facility provided forms that had dates indicating the facility is performing the inspections on a monthly basis.

CFI failed to maintain the fire deluge system appropriately.

iii. EPA reviewed the annual post indicator valve (PIV) inspection forms from 2022-2024 and noted multiple reoccurring deficiencies including but not limited to rust, missing paint, missing site glass, rusted blots, missing indicators, failure to turn handles and broken pins.

vi. On or about May 1, 2023, and at times prior to, CFI did not ensure that inspection and testing of emergency alarm activation from control rooms was being conducted as identified in the 2023 compliance audit.

v. On or about May 1, 2023, and at times prior to, CFI did not include ammonia and smoke sensors located in the HVAC intakes of designated SIP buildings in the calibration and testing program, as identified in the 2023 compliance audit.

At the conclusion of this RMP inspection, I conducted a closing conference at CFI at 11:15 AM on February 14, 2025, for the inspection. During the closing conference, I explained the EPA inspection report process. At the time of this closing conference, I identified four (4) areas of concern. Additionally, AOCs 2, 6, 7, 8, 9, 10, 11, 12 & 13 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.

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