

U.S. EPA REGION 6
ENFORCEMENT & COMPLIANCE ASSURANCE DIVISION
CLEAN AIR ACT SECTION 112(r) INSPECTION REPORT

Stationary Source	Placid Refining Co. L.L.C.
Facility Location	1940 Hwy 1 North Port Allen, LA 70767
Media	Clean Air Act (CAA) – Section 112(r) Risk Management Program (RMP) - 40 CFR Part 68
FRS Number	110000449863
USEPA RMP Facility ID	1000 0011 7759
Latitude / Longitude	30.477096, -91.211180
Date of Inspection	November 13–15, 2024
US EPA Contact	Kristen Latiolais, U.S. EPA Region 6 Chemical Accident Enforcement Section
Description of Activities	Inspection included the following activities: • Opening conference with facility representatives • On-site document review • Field verification • Personnel interviews • Closing meeting with facility representatives
Inspection Participants	U.S. EPA Region 6 • Kristen Latiolais Louisiana Department of Environmental Quality (LDEQ) • Glen Jenkins • Jamie Vicknair • Christopher Smith Eastern Research Group, Inc. (ERG), contractor for U.S. EPA • Dan Roper • Sarah Biscardi
Facility Participants	Barry Joffrion, Placid/ Health, Safety, and Environmental Manager Lacy Louque, Placid/Regulatory Coordinator Patrick Hobbins, Placid/Tech Services Manager Luke Stein, Placid/Operations Manager John Kaiser, Placid/Vice President of Refining Jonathan Devall, Placid/Health & Safety Compliance Specialist Nicole Brien, Placid/Environmental Affairs Supervisor Tucker Brown, Placid/Environmental Engineer Brett “Junior” Cowart, Placid/Emergency Response Safety & Security Team Leader Jason Midgett, Placid/Environmental Engineer

Facility Participants (contd.)	Karey LaBauve, Placid/VPP Safety Coordinator	
	Chuck Blanchard, Placid/Training Manager	
	Eddie Acosta, Placid/Reliability Manager	
	Kyle Bowman, Placid/Reliability Supervisor	
	Duwane Dolan, Placid/Chief Inspector	
	Tod Gauthe, Placid/Training Coordinator	
	Kirk Mancuso, Placid/Assistant Training Coordinator	
	Joey Gilbert, Placid/Process Superintendent	
	Troy Blair, Placid/Southside Process Forman	
	Ricky Riche, Placid/Engineering Manager	
	Connor Hinson, Placid/Maintenance Engineering Superintendent	
	Stacey Beassie, Placid/Instrumentation and Electrical (I/E) Manager	
	Larry Adcox, Placid/Maintenance I/E Supervisor	
	Carrol Marks, Placid/Terminal Superintendent	
	For EPA – ERG Lead Inspector Signature/Date	
Dan Roper, ERG		Date
EPA Supervisor Signature/Date		
	Kayla Buchanan	Date

FACILITY/PROCESS DESCRIPTION

The Port Allen Refinery (the Facility, or the refinery) is located in Port Allen, West Baton Rouge Parish, Louisiana. Placid Refining Company, LLC is the current owner and operator of the Facility, having acquired the refinery in 1975 from the previous owners Toro Petroleum Corp. Facility representatives stated that the Crude Unit began operations in the early 1970s and other RMP covered units in 1975 or later.

The Facility operates 24 hours per day and 7 days per week via four rotating 12-hour shifts. The facility employs approximately 228 full-time employees with approximately 187 reporting to the refinery. On any given day, the Facility could have between 75 and 100 nested contractor employees supporting the Facility. There are no labor unions at the Facility. The Facility operations are controlled from the Operations Control Room, which is located near other administrative buildings on the west side of the site.

The Facility uses domestically sourced crude oil supplied by barges, trucks, or one of several common carrier pipelines. Refinery products include gasoline, diesel products, commercial and military jet fuel, liquified petroleum gas (LPG), and heavy fuel oil. The Facility's products are primarily sold in the southeastern United States and transported via barges, trucks, or pipelines. The Facility has the capacity to process a maximum of 82,000 barrels per day (bpd) of crude oil, with a nominal capacity of 75,000 bpd. The Facility receives hydrofluoric (HF) acid via truck for use in the HF Alkylation Unit.

The Facility reported eight (8) Program Level 3 covered processes subject to the requirements of United States Environmental Protection Agency's (EPA) Risk Management Program (RMP) regulations in its most recent RMP submission, dated September 30, 2024, which are listed in Table 1, below.

Table 1. RMP Covered Process for the Facility

Process ID	Process Name	Program Level	Chemical	Quantity (lb.)	Category
1000145239	CGHT Unit	3	Flammable Mixture	760,000	Flammable
		3	Flammable Mixture	20,000	Flammable
1000145240	Treaters	3	Flammable Mixture	120,000	Flammable
		3	Flammable Mixture	250,000	Flammable
1000145241	Crude Unit	3	Flammable Mixture	83,000	Flammable
		3	Flammable Mixture	430,000	Flammable
		3	Flammable Mixture	140,000	Flammable

Table 1. RMP Covered Process for the Facility

Process ID	Process Name	Program Level	Chemical	Quantity (lb.)	Category
1000145242	Tanks/Terminal Storage	3	Flammable Mixture	440,000	Flammable
		3	Flammable Mixture	5,100,000	Flammable
		3	Flammable Mixture	300,000	Flammable
		3	Flammable Mixture	2,100,000	Flammable
		3	Flammable Mixture	160,000	Flammable
		3	Flammable Mixture	540,000	Flammable
		3	Flammable Mixture	62,000,000	Flammable
		3	Flammable Mixture	92,000,000	Flammable
1000145243	Rose Unit	3	Flammable Mixture	280,000	Flammable
1000145244	Reformer Unit	3	Flammable Mixture	1,100,000	Flammable
1000145245	HF Alkylation	3	Hydrogen Fluoride/HF Acid	45,000	Toxic
		3	Flammable Mixture	390,000	Flammable
		3	Flammable Mixture	1,100,000	Flammable
1000145246	FCCU	3	Flammable Mixture	68,000	Flammable
		3	Flammable Mixture	290,000	Flammable
		3	Flammable Mixture	190,000	Flammable

Based on the limited time available for the inspection, the EPA Region 6 inspection team (EPA inspection team) focused on the following units:

- Hydrofluoric Acid Alkylation (HF Alky) [RMP Process ID 1000145245]; and
- Fluidized Catalytic Cracking Unit (FCCU) Complex [RMP Process ID 1000145246].

The EPA inspection team selected the HF Alky unit because it was the basis for the Facility's worst-case release scenario for toxic in substances its Offsite Consequence Analysis (OCA). The EPA inspection team selected the FCCU due to nationwide safety concerns following FCCU accidents at the ExxonMobil Torrance and Husky Superior refineries.

PURPOSE OF THE INSPECTION

EPA selected the Placid facility for inspection because it operates an alkylation unit that uses HF acid. EPA's National Enforcement and Compliance Initiatives (NECIs) for FY 2024-2027¹ prioritize the inspection of facilities that use HF, due to recent incidents involving the release or potential release of HF and the potentially catastrophic consequences of an HF release.

The EPA inspection team, consisting of two contractor inspectors from Eastern Research Group, Inc. (ERG), one EPA inspector, and three representatives of the Louisiana Department of Environmental Quality (LDEQ), inspected the Facility from November 13, 2024 through November 15, 2024. The inspection focused on the Facility's implementation of and compliance with the requirements under CAA § 112(r) Risk Management Plan. While at the refinery, the EPA inspection team performed a field walkdown of the HF Alky Unit and FCCU, conducted interviews with refinery representatives, and requested documents for review.

In preparation for the inspection, Aimee Boss of U.S. EPA Region 6 sent an electronic notice of inspection and request for information (RFI) to John Kaiser, Vice President of Refining and Barry Joffrion, Health, Safety & Environmental (HSE) Manager for Placid Refining on October 23, 2024. The RFI included a list of documentation that the EPA inspection team intended to review upon their arrival at the Facility on November 13, 2024. The EPA correspondence to the Facility also requested that the Facility inform employee representatives of the inspection and invite them to participate as required by CAA § 112(r)(6)(L). Barry Joffrion, HSE Manager, confirmed the receipt of the notice of inspection on behalf of the Facility on October 23, 2024.

OPENING CONFERENCE

Inspector Dan Roper initiated the opening conference at approximately 8:10 am on Wednesday, November 13, 2024, by introducing the members of the EPA inspection team and explaining the purpose and scope of the inspection. He presented his inspector credentials to Barry Joffrion, HSE Manager, and discussed the expected logistics of each day, which included interviews with Facility personnel, documentation requests, a general walking tour of the entire refinery, and walkthroughs of the HF Alky unit and FCCU processes. The opening meeting included Placid representatives who also participated throughout the inspection. The Sign-In

¹ <https://www.epa.gov/system/files/documents/2023-08/fy2024-27necis.pdf>

Sheet (see Attachment 2) records all Placid representatives who were either present at the opening conference or who participated in interviews during the inspection.

INSPECTION OVERVIEW

Facility representatives provided a brief overview of the Facility's operations as well as specific details about the operation of the HF Alky unit and FCCU processes and details regarding their Mechanical Integrity Program. The Facility coordinated a walking tour of the refinery to allow the EPA inspection team to become familiar with the physical layout and equipment at the Facility. The EPA inspection team met with multiple personnel to discuss the implementation of and compliance with the requirements of CAA § 112(r) Risk Management Plan with respect to the operation and maintenance of each unit. The Interview Sign-In Sheets (see Attachment 2) tracked all personnel that participated in interviews with the EPA inspection team. The EPA inspection team also completed walkthroughs of the FCCU and the perimeter of the HF Alky unit processes.

While on-site, the EPA inspection team requested additional documentation to support the Facility's implementation of the applicable requirements of CAA § 112(r) Risk Management Plan at each of the selected operating units. The Inspection Document Review/Request List (see Attachment 3) recorded each document identified for further review by the EPA inspection team. The EPA inspection team provided a copy of the document request list to Placid at the conclusion of the inspection. Placid representatives provided the requested documentation during and immediately following the inspection.

FIELD AND INITIAL INSPECTION OBSERVATIONS

Around 9:00 am on Wednesday, November 13, 2024, refinery representatives provided a walking tour of the refinery to the EPA inspection team, but weather conditions ended the tour after only walking along the HF Alky battery limits. On Thursday, November 14, 2024, facility representatives escorted EPA inspectors to the FCCU, around other refinery process units, and to the Operations Control Room. Facility representatives also provided a tour of select emergency response equipment, including the two Quick Attack trucks, Fire Truck, and Emergency Response Vehicle. Across both walkthroughs, the EPA inspection team took a total of 12 photographs of process equipment. The photographs and photograph log are provided in Attachment 4. Observations made during the walkthrough of the processing units and onsite conversations with facility personnel include:

- Process piping throughout the Facility, particularly in the HF Alky unit (see photograph #PB130003) was not sufficiently labeled or color-coded to indicate the contents or direction of flow per American Society of Mechanical Engineers (ASME) A13.1 (2023). As such, this equipment does not comply with recognized and generally accepted good engineering practices (RAGAGEP) per 40 CFR § 68.65(d)(2).
- The EPA inspection team identified inconsistencies between piping and instrumentation diagrams (P&IDs) and equipment observed during the field inspection. Due to these observed inconsistencies, the Facility has failed to maintain accurate process safety

information and has not ensured that its P&IDs are accurate and up to date in accordance with 40 CFR § 68.65(d)(1)(ii). Additional details are provided in the Process Safety Information Section of the inspection report.

- An SCBA on the North side of the unit was identified to be overdue for annual inspection by one month. Facility representatives stated that due to an issue with the contractor, annual inspections have been delayed but are expected to be completed soon. However, this does not comply with 40 CFR § 68.95(a)(2) to follow procedures for the inspection, testing, and maintenance of emergency response equipment. Additional details are provided in the Emergency Response Section of the inspection report.
- Generally, the ground in the FCCU was observed to be slick, covered with oily materials, and appeared to present a potential slip hazard. The EPA inspection team recommended that the Facility ensure they have good housekeeping procedures in place for the safety of all personnel working throughout the process units.

DOCUMENTATION REVIEW

Facility representatives responded to EPA's pre-inspection RFI and provided the requested documentation by November 8, 2024. Additional facility documents were provided to the EPA inspection team in response to the Document Request List (Attachment 3) by November 20, 2024, via electronic means. The following subsections include an overview of the EPA inspection team's review of program documentation for the relevant Program 3 (P3) Prevention Program elements and a summary of observed areas of concern (AOCs), where appropriate.

40 CFR PART 68 – CHEMICAL ACCIDENT PREVENTION PROVISIONS

40 CFR § 68.10 – Applicability

The Facility's most recent RMP submission, dated September 30, 2024, listed 8 covered processes (see Table 1), all of which the Facility reported to be RMP P3 covered processes for flammable mixtures. The Facility also reported the HF Alky Unit to be RMP P3 covered processes for toxics (HF).

The Facility's 2024 RMP Submittal Report indicated that a worst-case release and an alternative release scenario were identified for each reported toxic and flammable substance. Only the alternative release scenario of flammables from the Tanks Unit produces a distance to endpoint that is less than the distance to any public receptors². BakerRisk's RMP Submittal Development Final Report, dated September 26, 2024, provided tables of each scenario, including quantities of each chemical, conditions of release, and distance to endpoint (in miles) based on RMPComp® model results. This report also provided maps showing the distance to endpoint and nearest public receptors for each scenario. Additionally, the Facility indicated that it had not had any accidental releases of regulated substances meeting the criteria for inclusion in the five-year accident history. Further, the Facility indicated that it had coordinated emergency

² See RFI Responses #5, EPA Upload RMP Sections 2 through 5.pdf and RMP Submittal 093024 - Sections 2.3 and 2.4.pdf

response procedures with local emergency planning and response organizations for P3 processes.

The EPA inspection team did not identify any potential AOCs in relation to this program element based on documentation reviewed, to-date.

40 CFR § 68.15 – Management Systems

The Facility has developed a management system to oversee implementation of the RMP elements. The Vice President of Refining oversees the risk management program, and each program element is assigned to various managers, superintendents, or team leaders. An organizational chart shows the positions responsible for each RMP element and the reporting structure of the overall program³.

The EPA inspection team did not identify any potential AOCs in relation to this program element based on documentation reviewed, to-date.

40 CFR § 68.22 – Off site Consequence Analysis (OCA)

The Facility used EPA's RMP*Comp program to model the worst-case scenarios (WCSs) and alternative release scenarios (ARSs) for flammables and toxics from its P3 covered processes. The Facility modeled and reported one toxic WCS for a release of hydrogen fluoride (HF) from the HF Alky unit (RMP Process ID 1000145245) as well as one ARS from a HF transfer hose failure. The Facility did not assume any mitigation measures when calculating the distance to endpoint for worst case scenario, but considered the double seal, deluge, and emergency shutdown systems in the ARS.⁴

The Facility also used EPA's RMP*Comp to model both WCSs and ARSs for flammables from the Tanks/Terminal Storage P3 covered process. The Facility modeled the WCS for flammables that resulted in the largest distance to endpoint as a loss of containment and Vapor Cloud Explosion (VCE) from various storage tanks in the Terminal Storage covered process (RMP Process ID 1000145242).⁵

The Facility defined offsite populations using EPA's Mapping Application for Response, Planning, and Local Operational Tasks (MARPLOT). Maps provided from MARPLOT use 2010 Census data, as MARPLOT has not been updated to use the most recent 2020 Census data. Therefore, the Facility should compare the 2010 and 2020 Census data to ensure estimates of population are accurate until MARPLOT is updated. Additionally, population data was not reported to two significant digits.

³ See Risk Management Org Chart 2024.pdf

⁴ See RFI Responses #5, EPA Upload RMP Sections 2 through 5.pdf and RMP Submittal 093024 - Sections 2.3 and 2.4.pdf

⁵ See RFI Responses #5, EPA Upload RMP Sections 2 through 5.pdf and RMP Submittal 093024 - Sections 2.3 and 2.4.pdf

The Facility identified the presence of institutions (e.g., schools, hospitals, prisons); parks and recreational areas; and major commercial, office and industrial buildings using Google Earth. The Facility provided maps of offsite impact distances, offsite populations, and environmental receptors for each WCS and ARS as a section in the BakerRisk RMP Submittal Development Report.⁶

The EPA inspection team has identified AOC 1 at the end of this inspection report for this program element.

40 CFR § 68.42 – Five Year Accident History

The Facility did not report any accidents in its September 2024 RMP submittal. The EPA inspection team did not identify any accidents meeting the requirements for reporting.

The EPA inspection team did not identify any potential AOCs in relation to this program element based on documentation reviewed, to-date.

40 CFR § 68.65 – Process Safety Information (PSI)

The Facility maintains PSI for the entire facility on their intranet site which is accessible by all employees. The PSI contains process flow diagrams, safety data sheets, process chemistry, maximum intended inventory, cause and effect diagrams and consequences of deviation, electrical classification drawings, relief and ventilation system design basis, design codes and standards employed, and material and energy balances for the entire facility. The Facility also maintains piping and instrumentation diagrams (P&IDs) of all equipment as well as documentation of safety systems employed at the facility. The Facility refers to a list of API standards and corporate design standards to ensure equipment is made of adequate materials.

During the two walkthroughs of the facility conducted on November 13 and 14, 2024, Facility representatives ensured that the EPA inspection team had an adequate understanding of the Facility's layout. During these walkthroughs, the EPA inspection team identified inconsistencies between P&IDs and equipment observed during the field inspection. For example, P&ID # 05-D-100-106 did not depict a drain line that was present in the field on the four-inch boiler feed water supply line to shell side between the 4" valve and flange on the bottom of Exchanger E-532. Additionally, P&ID # 05-D-100-119-1 depicted a car seal on the 3/4" valve upstream of the PSV on Exchanger E-590 but inspectors did not observe a car seal in the field. Due to these observed inconsistencies, the Facility has failed to maintain accurate PSI nor ensured that its P&IDs are accurate and up to date.

During the inspection, the EPA inspection team interviewed engineers and management on the implementation of the HF detection system. In approximately 2016, the Facility installed three parallel Boreal open-path HF detectors running from North to South on the East side, West side, and middle of the HF Alky Unit and later installed point source detectors outside the unit

⁶ See RFI Responses #5, EPA Upload RMP Sections 2 through 5.pdf and RMP Submittal 093024 - Sections 2.3 and 2.4.pdf

battery limits. At the time of the implementation, Section 6.4 of the 2013 Version of American Petroleum Institute Recommended Practice (API RP) 751, *Safe Operation of Hydrofluoric Acid Alkylation* did not specify any guidance on placement of detectors. In 2021, API RP 751 was updated to provide the following specification on placement of detectors in Section 9.4.2: “HF sensors should be selected and located such that they detect potential HF releases of concern per quantitative assessment criteria under varying weather conditions (including all wind directions, not just prevailing wind directions), release rates, potential leak sources, and elevation.” While the current detectors may comply with this requirement, the Facility was not able to produce documentation that explained its logic for placement of current detectors. Facility representatives noted that they are considering a future project to install additional point source detectors, and therefore, the EPA inspection team encouraged the Facility to consider the current API RP 751 (2021) specifications when identifying new detector locations in order to comply with RAGAGEP.

The Emergency Evacuation plan⁷ stated that the Operations Control Room is a designated shelter in place area that can be converted to a “Safe Haven” if necessary. If prevailing winds direct a vapor release towards the Operations Control Room or if LEL readings or toxic air readings are present in the area, it can be converted by shutting off the HVAC system and sealing doorways and vents. Additionally, respirators and air bottles are available for the operators that remain in the Operations Control Room. However, API RP 751 (2021) Section 3.1.80 defines a safe haven as a building that has specifically engineered design level of protection. Section 4.1.6.2 states:

“As safe havens can be of varying designs, including fresh air supplies for essential occupants at a minimum and scrubbing systems for air ingress points, engineering is involved in determining the suitability of the safe havens response for a given external release condition. If a site has a safe haven, then the design basis of the safe haven shall be documented. The safe haven design basis uses an external contaminant concentration and duration profile to determine the exposure level for occupants inside the building (or inside a particular designated area of the building) based on infiltration.”

Though requested, the Facility was unable to produce a design basis for the designated safe haven. Therefore, the Operations Control Room does not meet the requirements for a designated safe haven. Additionally, per API RP 751 (2021) Section 3.1.83, the Operations Control Room may be considered a shelter in place, defined as a building that gets additional isolation by the occupants closing doors, closing windows, and shutting off HVAC systems. If the Facility intends to designate the Operations Control Room as a safe haven, a design basis should be developed to justify the level of protection granted from engineering controls to prevent migration of outside airborne contaminants from infiltrating the room. The lack of a safe haven design basis was identified in the Facility’s 2022 API RP 751 audit. Facility representatives indicated a budget request had been made to conduct a study on the Operations Control Room ventilation.

⁷ See EP_05 Emergency Evacuation Plan.pdf

The Facility's 2022 API RP 751 audit indicated the seven (7) water mitigation cannons could be remotely activated but could not be remotely controlled as required by API RP 751 (2021) Section 9.2(b). Facility representatives indicated a project to add remote control capability was a future budget item. Of note, the EPA inspection team observed that the 2019 API RP 751 audit did not identify such a deficiency. However, Section 6.2 of the previous version of API RP 751 (2013), which was applicable prior to 2021, included a similar requirement for "Remotely-activated and remotely-controlled water mitigation" as a mitigation system that "... shall be provided for all HF alkylation units." Therefore, the Facility has not complied with this requirement under API RP 751 since at least 2013.

The EPA inspection team has identified AOCs 2, 3, 4, and 5 at the end of this inspection report for this program element.

40 CFR § 68.67 – Process Hazard Analysis (PHA)

The Facility revalidates PHAs every five years according to their PHA procedure (undated)⁸. This procedure establishes standards, guidance, and minimum requirements for the development and implementation of PHA programs. The procedure states that all PHAs involving existing units and new processes will use the Guideword Hazard and Operability (HAZOP) methodology supplemented with a Siting and Human Factors checklist and Independent Protection Layer (IPL) Analysis as needed for high severity scenarios. The PHA procedure also establishes requirements for the PHA schedule, team composition, preparation, and execution. While the Facility can conduct PHAs in-house, they typically contract a third party to facilitate PHAs.

The EPA inspection team requested and received the two most recent PHAs for the HF Alky unit and FCCU, as well as the status of any recommendations from these PHAs and the timeline for PHAs covering other processes. The 2016 PHA for the HF Alky Unit resulted in eighteen (18) recommended actions, which were all addressed and completed in a timely manner. The 2021 PHA for the HF Alkylation Unit resulted in five (5) action items that were ultimately cancelled due to technical infeasibility of the recommended action. The Facility provided cancellation forms for these action items that denote the reason and approval for cancellation. The 2018 PHA for the FCCU resulted in nine (9) recommended actions that were addressed and completed in a timely manner. Lastly, the 2023 PHA for the FCCU did not result in any recommended actions. Recommended actions from PHAs are tracked by Brett "Junior" Cowart, Emergency Response Safety & Security Team Leader. Brett Cowart works with the PHA team to assign a responsible party and due date for each action and coordinate recurring bi-monthly action item review meetings. Lastly, Facility management communicates actions to operating, maintenance, and other employees whose work assignments may be affected by recommendations during daily or weekly meetings. Final PHA reports and recommendation forms are uploaded to the Placid Intranet so that affected employees can access this information at all times.

⁸ See RFI Responses #8, Process Hazard Analysis (PHA) Procedure.pdf

The EPA inspection team did not identify any potential AOCs in relation to this program element based on documentation reviewed, to-date.

40 CFR § 68.69 – Operating Procedures

The Facility has developed written operating procedures that include written instructions to safely startup, shutdown, and maintain normal operations⁹. Included in the operating procedure is an overview section that gives the scope or purpose of the operating procedure, associated hazards, prerequisites, and safety systems and devices. Operating procedures also reference the not-to-exceed (NTE) limits or consequences of deviations via a link to another document on the Intranet site. Operating procedures are reviewed annually and updated if needed. All manuals and procedures are available electronically on the Placid Intranet.

The EPA inspection team reviewed several operating procedures for the FCCU and HF Alky unit, including, but not limited to: OI-AU-1502 – Unloading a HF Acid Truck; OI-AU-1526 – Alky Unit Shutdown; OI-AU-1587 – Emergency Acid De-Inventory; OI-AU-1589 – Alky Unit Temporary Shutdown; and OI-FC-1215 – FCCU Shutdown.

During the inspection, the EPA inspection team discussed with Facility representatives how operators are directed to maintain a separation between air and flammable hydrocarbons during FCCU shutdown operations due to the 2018 refinery explosion and fire at the Husky Superior Refinery in Wisconsin. Upon review of the FCCU emergency shutdown procedure, OI-FC-1215, the EPA inspection team determined that the procedure does not clearly identify the need to maintain reactor pressure higher than regenerator pressure nor does it specify a minimum pressure differential (ΔP). Facility representatives stated during interviews that operators are generally aware of this requirement, but insufficient documentation was produced to document the hazards and consequences of deviation. Therefore, the Facility failed to document a proper shutdown procedure that ensures FCCU shutdown events are executed safely.

The EPA inspection team noted that HF Alky unit NTEs are more clearly defined than FCCU NTEs¹⁰. For example, in the HF Alky Unit NTEs for the HF Stripper Tower Bottoms Temperature, it states, “The NTE on the HF stripper Tower Bottoms temperature will be a low temperature of 135°F.” In comparison, in the FCCU NTEs for low reactor temperature, it states, “The NTE on the reactor should be a low temperature of 890°F.” The difference in language between “will” and “should” may provide confusion for operators on what is a recommended limit for operational efficiency and what is a safety requirement. Therefore, the Facility did not document clear operating limits.

Lastly, the EPA inspection team identified inconsistencies in documenting steps required to correct or avoid deviation. Specifically, steps provided in NTE documentation are not specific enough to direct an operator through each action to make the correction or avoid deviation.

⁹ See PSM Manual Section 21 – Operating Procedures.pdf and SP-49 Policy for Developing Procedures.pdf.

¹⁰ See Alkylation Unit (NTE) Limits & (IOW).pdf and FCC (NTE).pdf.

For example, in the FCCU NTEs for the Regenerator Temperature, the following is provided as one of three potential actions if the regenerator temperature is approaching NTE: “Slow catalyst circulation.” However, this is stated as the action and does not direct the operator on how to perform this action. The EPA inspection team would expect to see more specific steps of how to accomplish the process change, such as “Close regenerated catalyst slide valve X% to slow catalyst circulation.” Therefore, the Facility failed to provide clear instructions to safely conduct all required activities.

The EPA inspection team has identified AOCs 6 and 7 at the end of this inspection report for this program element.

40 CFR § 68.71 – Training

The Facility has developed a training program to onboard new employees and provide continuous training to tenured employees. Training Manager, Chuck Blanchard, maintains training records for all employees electronically via the learning management system, Exxtend Learn. The new employee training program assigns new personnel to either the North or South Side Area Units and each new employee is required to certify in all process units in that area to become a Technician Level 4. The new employee training program is a two-week course that covers basic health and safety, emergency response, process unit overviews, and other general topics for working in the area. Training programs use a mix of computer-based training and instructor-led and/or on-the-job training, and certification in any process unit requires successful completion of both a Unit Field Test and a Unit Written Test. New hires progress through four certification levels (i.e., Technician 1 through 4) as they gain experience. Once an operator has been certified as a Technician 4, they may undergo training to become a Distributive Control System (DCS) or Board Operator. Operators maintain their training requirements by taking required refresher training every three years. The training coordination team reviews upcoming training needs in Exxtend Learn on a regular basis and the system automatically notifies personnel when training is coming due. During the inspection, the Facility provided training documentation for one HF Alky Unit Operator and one FCCU Operator, which included a summary of training and recertification from the last six years and pass/fail designations.

The EPA inspection team did not identify any potential AOCs in relation to this program element based on documentation reviewed, to-date.

40 CFR § 68.73 – Mechanical Integrity

The Facility implements a mechanical integrity program that covers fixed equipment (e.g., process piping, pressure vessels), rotating equipment (e.g., pumps), instrumentation, and electrical equipment. The Facility provided multiple procedures that the Facility uses to maintain the on-going integrity of process equipment. Procedures shared with the EPA inspection team include guidance for completing visual inspections and testing of various process components, maintenance of dead-leg piping circuits and components, risk-based inspection procedures, and planning, executing, and managing a turnaround. The content of

the procedures reflected details discussed with the Reliability Manager and process engineers involved with equipment inspections and maintenance while at the Facility.

Inspection documents are collected and saved in an equipment condition tracking software called Plant Condition Monitoring Software (PCMS), which also has the ability to track inspection intervals, corrosion rates, and identify problem areas. The maintenance department also uses computerized maintenance management (CMM) software, Maximo, to manage and track equipment work orders, cost, and history.

Maintaining the reliability of pressure equipment such as pressure vessels, process piping, storage tanks, heat exchangers, and pressure relief devices is dictated by the Facility's Risk Based Inspection (RBI) program. This program allows users to define, measure, and use risk to make maintenance decisions, manage safety related risks in a cost-effective and efficient manner, and reduce the overall unit risk by optimizing inspection resources¹¹. The Facility's RBI program is implemented per API RP 580, *Risk-Based Inspection* and API RP 581, *Risk-Based Inspection Technology* and tracked via the SagePlus software system, which informs the upcoming risk-based inspection dates that are tracked in PCMS.

During the inspection, the Facility's Reliability Manager, Eddie Acosta, provided the EPA inspection team with a walkthrough of PCMS and SagePlus to demonstrate the implementation of the Facility's mechanical integrity program. Vessels, valves, heat exchangers, and other equipment were randomly selected to review the inspection and testing history and ensure that current testing needs are not overdue. Specifically, the EPA inspection team viewed: D-603 Acid Storage Drum in the HF Alky Unit as well as the Acid Blowdown pressure relief valve PSV-6112 on this drum; Acid Settler #1, D-617 in the HF Alky Unit; heat exchanger E-634 on the HF Alky Unit; LPG bullets; and, various condition monitoring locations (CMLs) throughout the HF Alky Unit as well as dead leg CMLs, such as along the overhead depropanizer piping run DOV-001. The EPA inspection team viewed inspection schedules, inspection reports, and results of previous testing events for this equipment.

The Facility identified one (1) pressure safety valve (PSV) in the HF Alky Unit and eleven (11) PSVs in the FCCU that were overdue for their 5-year inspection and testing.¹² Facility representatives indicated these inspections had been deferred six months as allowed by API 510, *Pressure Vessel Inspection Code: In-Service Inspection, Rating, Repair, and Alteration*. API 510 (2022), Section 6.7.2 defines a simplified deferral process that allows deferral for no more than 10 % of the inspection interval or six (6) months, whichever is less.

The EPA inspection team did not identify any potential AOCs in relation to this program element based on documentation reviewed, to-date.

¹¹ See Risk Based Inspection Procedural Manual, QA-GEN-VT34.pdf

¹² See RFI Responses # 29, FCC&Alky PSV Deferral.pdf

40 CFR § 68.75 – Management of Change (MOC)

The Facility has implemented an electronic MOC system through Gateway System, Facilix, along with a written policy to ensure changes to equipment, chemicals, technology, procedures, and other facility modifications are properly reviewed and authorized before being implemented¹³. MOCs are initiated by an originator and the area Process Engineer is responsible for conducting a risk screening via a form to determine the level of risk for the MOC, which may require a Simplified PHA checklist, a “What-if” analysis or full HAZOP depending on the risk. For all MOCs, the originator is responsible for completing the MOC form, which details the type of change, technical basis for the change, priority and necessary time period for the change, and what additional documentation will require updates due to the change, such as operating procedures and PSI. An owner of the MOC is assigned, typically a mechanical engineer in the Maintenance Engineering Department, and additional action items are created within Facilix to track minor subtasks required for MOC completion. The MOC process also directs coordination with the Training Department to ensure that employees whose job tasks would be affected by a change in the process is informed of and trained in the change. Once completed, the MOC designer verifies that the MOC is completed in the field, the Operations Liaison ensures that updated documents are uploaded to the portal, and the MOC owner closes the MOC within Facilix. The MOC program also delineates a process for an Emergency MOCs that expedites approval processes for situations where the change cannot be reviewed on a typical MOC timeline but is needed for the safe operation of the refinery or to mitigate imminent risk to safety, the environment, or community¹⁴.

The EPA inspection team did not identify any potential AOCs in relation to this program element based on documentation reviewed, to-date.

40 CFR § 68.77 – Pre-Startup Safety Review (PSSR)

The Facility requires the completion of a PSSR checklist for new or modified processes when the change requires a physical change or documentation update to ensure the continued accuracy of process details. Per the Facility’s PSSR policy, PSSRs may fall into three categories: Alarm or Control Change PSSR, Emergency Change PSSR, and Normal Change PSSR¹⁵. The PSSR team consists of the field coordinator, project engineer, inspection department, equipment maintenance technicians, and representatives from training and safety. Prior to receiving approval for operations, the PSSR team confirms the following: that construction and equipment installation was in accordance with design specifications; safety, operating, maintenance, and emergency procedures were in place and adequate; a PHA has been performed and recommendations resolved as necessary; stationary source requirements are met; and training of each employee involved in the operation has been completed. The Operations Designee is responsible for ensuring that all “showstopper” action items are

¹³ See Management of Change Program.pdf and SP-108, Process for Developing an MOC.pdf

¹⁴ See SP-100 Process for Developing an EMOC.pdf.

¹⁵ See PSSR Procedure.pdf and SP-114 Pre startup safety review PSSR for MOC work activity.pdf.

completed prior to the final approval of the PSSR. The field coordinator coordinates the sign-off requirements with appropriate department representatives.

The EPA inspection team did not identify any potential AOCs in relation to this program element based on documentation reviewed, to-date.

40 CFR § 68.79 – Compliance Audits

The Facility completed their most recent compliance audits in June 2021 and September 2024. While the 2021 audit was conducted in-house, the 2024 audit was led by a third-party contractor, AcuTech Consulting Group. The 2021 compliance audit¹⁶ identified two (2) findings related to implementation of the PHA and MOC program elements. Specifically, the 2021 Compliance Audit identified findings related to communication of PHA actions to operating, maintenance and other employees and a lack of consistent updates to PSI in follow-up to completed MOCs. Both actions were completed before the assigned due date. The 2024 compliance audit developed seventeen (17) findings in various RMP/PSM program areas, including the following: P&ID discrepancies; unavailable documentation on relief system design basis; undefined consequences of deviation; outstanding corrective actions related to equipment maintenance; and insufficient testing records. At the time of the inspection, recommendation tracking documentation indicated that eleven (11) of the seventeen (17) actions had been completed. However, the Facility did not consistently document the corrective actions taken toward each action item, specifically 2024-13, 2024-15, and 2024-16. As such the Facility has not promptly determined or documented an appropriate response to each of the findings of the compliance audit nor documented that deficiencies have been corrected, as required.

The EPA inspection team has identified AOC 8 at the end of this inspection report for this program element.

40 CFR § 68.81 – Incident Investigation

The Facility has an Incident Investigation Procedure (SP44) 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 a standard form for all incident investigation reports to document detailed information about the incident. Facility representatives noted that initial incident investigation reports are generated and filed electronically on the Intranet within 12 hours of the incident, and incidents resulting in a fire, injury, or fatality undergo a formal incident investigation led by the Training Manager. 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. The Facility uses a root cause investigation methodology to identify probable causes, corrective actions or recommendations, and lessons learned. Recommendations are tracked on the Facility's Intranet

¹⁶ See 2021 PSM-RMP Audit Report.pdf.

and may lead to development of action items in other systems, such as MOCs, training assignments, SOP modifications, and generated Work Orders.

Incidents and near-misses are discussed in weekly safety meetings, including contractor safety meetings. All employees have access to all incident reports and findings via the Intranet. Additionally, the Facility develops a quarterly safety newsletter highlighting the lessons learned from three recent incidents, which is distributed via email and hard copies posted throughout the Facility. Refinery managers meet annually with the Incident Investigation Leader to review the previous year's incidents to determine ways to improve safety and hazard communication. Facility representatives provided multiple incident investigation reports to the EPA inspection team.

The EPA inspection team did not identify any potential AOCs in relation to this program element based on documentation reviewed, to-date.

40 CFR § 68.83 – Employee Participation

The Facility developed a policy for employee participation in all elements of the Facility's RMP and PSM programs¹⁷. The policy details responsibilities of employees for the development and implementation of each program element, and interviews with personnel during the EPA inspection verified that operators are encouraged to participate in RMP elements relevant to their operating unit. Completed PHAs are available to all operations employees through the refinery intranet system. Operators are also able to directly request changes to operating procedures. All employees participate in periodic safety meetings, and operators are encouraged to identify and report any identified issues.

The EPA inspection team did not identify any potential AOCs in relation to this program element based on documentation reviewed, to-date.

40 CFR § 68.85 – Hot Work Permits

The Facility has developed and implemented a hot work safety procedure for any work that involves burning, welding, brazing, soldering, grinding, and creating or generating sparks in areas where flammable liquids or gases may be present¹⁸. This procedure is applicable to all Facility employees and contractors, and it outlines the responsibilities of the operations/terminal supervisor, process/terminal operator, and maintenance supervisor. 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). The hot work permit indicates the date issued and permits are only issued for one shift. Permits are completed and handled as hard copies to be displayed at the jobsite and kept on file for up to 30 years.

¹⁷ See Employee Participation Implementation Summary.pdf

¹⁸ See SP-09 Hot Work Safety Procedure.pdf

The EPA inspection team did not identify any potential AOCs in relation to this program element based on documentation reviewed, to-date.

40 CFR § 68.87 – Contractors

The Facility developed safety requirements for all contractors and subcontractors that visit or perform work at the Facility¹⁹. The safety procedure documents the contractor approval process such as submission of the Pre-Qualification Form (PQF) and supporting documentation, contractor orientation requirements, and other safety requirements applicable to all contractors or visitors. Contractor approvals expire and must be renewed annually. The Safety Department reviews and approves initial and renewal PQF packages and performs Contractor Safety Evaluations at the end of the work period. Contractors are required to take the Onsite Safety Review and must follow the Facility's Safety Procedures unless their company safety procedures are more stringent than the Facility's. This safety training covers confined space, hot work, safe work permits, lockout/tagout, welding, PPE, elevated (above ground) work, emergency response, and hazard communication. Additionally, the Facility offers a weekly training course for contractors on rotating topics to ensure safe work is performed²⁰. When contractors are conducting work on-site, the contractor must provide at least one safety officer depending on the number of employees the contracting company has on site.

The EPA inspection team did not identify any potential AOCs in relation to this program element based on documentation reviewed, to-date.

40 CFR § 68.95 – Emergency Response

The Facility is a responding facility and has the capability to address emergency situations including fire, chemical releases, and medical emergencies involving Facility employees and on-site contractors. Placid Refining has established an emergency action plan that is available to employees electronically on the Placid Intranet.

The Facility has trained 114 operators and technicians as the Emergency Response Team so that each shift contains an operational team able to respond to situations. Firefighting equipment includes a fire truck, two Quick Attack trucks, fire extinguishers, fixed fire boxes, fixed fire monitors, firefighting PPE, spill response trailer, and various portable equipment such as portable ground monitors. The Facility also maintains HF spill response kits, SCBAs, and fire hoses throughout the facility. Contractors inspect and maintain a majority of the response equipment annually, while the Facility provides monthly inspections of all equipment.

During the inspection walkthrough of the HF Alky Unit, an SCBA was identified on the North side of the unit that was overdue for annual inspection by a month. Facility representatives stated that due to an issue with the contractor, annual inspections have been delayed but are expected to be completed soon. As such, this does not comply with the requirement to follow procedures for the maintenance of emergency equipment.

¹⁹ See SP-41 Safety Requirements for all Contractors.pdf.

²⁰ See Resident Contractor Training Schedule 2024.pdf.

Additionally, the Emergency Evacuation Plan²¹ documents the steps personnel must take in administrative buildings if a “Shelter-in-Place” order is directed. Step 3 of the Emergency Evacuation Plan for “Shelter-in-Place” areas includes shutting down the HVAC system. However, no documentation of testing or inspection of this shutdown was provided. The EPA inspection team recommended including the inspection and testing of the HVAC emergency shutdown in emergency equipment maintenance procedures and to document the HVAC shutdown during muster drills.

Emergency drills are performed annually, and the most recent emergency response exercise was conducted in November 2023. The Facility conducts emergency response preparedness activities and coordinates any emergency response actions with the local Port Allen Fire Department, West Baton Rouge Parish Local Emergency Planning Committee (LEPC), and other local or regional entities that can provide support to emergency situations. Placid Refining uses the I-Notification system, an emergency notification system used by local industry for communication between Facility representatives and local community emergency responders during potential emergency situations. While Facility representatives stated that they meet with the LEPC quarterly, documentation was not provided to document coordination with the LEPC, including providing the Emergency Action Plan annually. The EPA inspection team recommended that the Facility keep a copy of each communication to the LEPC offering the plan to meet the requirements of 40 CFR § 68.93(b).

The EPA inspection team has identified AOCs 9 and 10 at the end of this inspection report for this program element.

40 CFR § 68.195 – Risk Management Plan

The Facility most recently submitted RMPs to EPA in May 2016 (resubmission for a revised PHA), October 2019 (5-year update), and September 2024 (5-year update). The resubmissions were all within the 5-year timeframe.

The EPA inspection team did not identify any potential AOCs in relation to this program element based on documentation reviewed, to-date.

CLOSING CONFERENCE

Inspector Dan Roper initiated the closing conference at 11:00 am on Friday, November 15, 2024. He reviewed eight (8) initial AOCs identified during the inspection and stated that additional AOCs may be identified once EPA reviews the documentation provided by the Facility in detail.

Inspectors Dan Roper and Kristen Latiolais discussed the estimated timing for delivery of the inspection report to the Facility and the expected coordination between U.S. EPA Region 6 and

²¹ See EP-05 – Emergency Evacuation Plan.pdf.

the Facility. There were no questions from the Facility personnel, and he adjourned the closing conference around 11:15 am.

AREAS OF CONCERN (AOCs)

[AOC 1] Hazard Assessment, 40 CFR 68.30(c) – (c) Data Sources Acceptable. *The owner or operator may use the most recent Census data, or other updated information, to estimate the population potentially affected.*

The Facility used MARPLOT, which uses 2010 Census data, to estimate the population potentially affected in its offsite consequence analysis. Because 2020 Census data are available, the Facility did not use an acceptable data source to estimate the population potentially affected.

[AOC 2] Process Safety Information (PSI), 40 CFR 68.65(d)(1)(ii) – (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. Due to these observed inconsistencies, the Facility has failed to maintain accurate PSI and has not ensured that its P&IDs are accurate and up to date in accordance with 40 CFR § 68.65(d)(1)(ii).

- P&ID # 05-D-100-106 did not depict a drain line that was present in the field on the four-inch boiler feed water supply line to shell side between the 4" valve and flange on the bottom of Exchanger E-532.
- P&ID # 05-D-100-106-1 depicted a car seal on the 3/4" valve upstream of the PSV on Exchanger E-590 but inspectors did not observe a car seal in the field.

[AOC 3] Process Safety Information (PSI), 40 CFR 68.65(d)(2) – (d) Information pertaining to the equipment in the process. *(2) The owner or operator shall ensure and document that the process is designed and maintained in compliance with recognized and generally accepted good engineering practices.*

The EPA inspection team identified refinery process piping, particularly in the HF Alky unit (see photograph #PB130003), that was not labeled or color coded to indicate contents, direction of flow, and/or potential hazard per ASME A13.1 (2023). As a result, this equipment does not comply with RAGAGEP pursuant to 40 CFR § 68.65(d)(2).

[AOC 4] Process Safety Information (PSI), 40 CFR 68.65(d)(2) – (d) Information pertaining to the equipment in the process. (2) The owner or operator shall ensure and document that the process is designed and maintained in compliance with recognized and generally accepted good engineering practices.

The Facility considers the Operations Control Room to be a designated safe haven in the case of a toxic release that could potentially impact the control room. However, API RP 751 (2021) defines safe havens as having specifically engineered level of protection to prevent the migration of outside airborne contaminant from infiltrating these buildings while the occupants carry out operational activities, and the safe haven design basis shall be documented. The Facility has not documented the safe haven design basis, and therefore, this does not conform with RAGAGEP per API RP 751 (2021) Section 4.1.6.2.

[AOC 5] Process Safety Information (PSI), 40 CFR 68.65(d)(2) – (d) Information pertaining to the equipment in the process. (2) The owner or operator shall ensure and document that the process is designed and maintained in compliance with recognized and generally accepted good engineering practices.

The Facility's water mitigation cannons are not remotely controlled as currently required by API RP 751 (2021) Section 9.2(b) or previously required by API RP 751 (2013) Section 6.2. As a result, this equipment does not comply with RAGAGEP pursuant to 40 CFR § 68.65(d)(2). Although the Facility identified this deficiency in the Facility's 2022 API RP 751 audit, it has not been in compliance with RAGAGEP since at least 2013.

[AOC 6] Operating Procedures, 40 CFR 68.69(a)(1)(iv) – (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. (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.

FCCU emergency shutdown procedure, OI-FC-1215, did not clearly identify need to maintain reactor pressure higher than regenerator pressure nor did it specify a minimum pressure differential (ΔP). Therefore, the Facility failed to document a proper shutdown procedure that ensures the shutdown is executed safely.

[AOC 7] Operating Procedures, 40 CFR 68.69(a)(2)(ii) – (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. (2) Operating limits: [...] (ii) Steps required to correct or avoid deviation.

Steps provided in NTE documentation are not specific enough to direct an operator through each action to make the correction or avoid deviation. For example, in the FCCU NTEs for the Regenerator Temperature, the following is provided as one of three potential actions if the regenerator temperature is approaching NTE: "Slow catalyst circulation". However, this is stated as the action and does not direct the operator on how to perform this action. The EPA inspection team would expect to see more specific steps of how to accomplish the process change, such as "Close regenerated catalyst slide valve X% to slow catalyst circulation." Therefore, the Facility failed to provide clear instructions for the steps required to correct or avoid deviation.

[AOC 8] Compliance Audits, 40 CFR 68.79(d) – *(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.*

At the time of the November 2024 inspection, the response activities and completion status of the 2024 audit findings are not well documented, including 2024-13, 2024-15, and 2024-16.

[AOC 9] Emergency response coordination activities, 40 CFR 68.93(b) – *(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.*

While facility representatives stated that the Emergency Action Plan is offered to the LEPC annually and the LEPC does not request a copy, documentation was not provided of this coordination with LEPC. The EPA inspection team recommends that the Facility keep a copy of each communication to the LEPC offering the plan to meet the requirements of 40 CFR § 68.93(b).

[AOC 10] Emergency response coordination activities, 40 CFR 68.95(a)(2) – *(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;

The procedure for maintenance of emergency equipment²² states that all SCBAs are tested annually by a third-party contractor. During the inspection walkthrough of the HF Alky Unit, a SCBA was identified on the North side of the unit that was overdue for annual inspection by a month. Facility representatives stated that due to an issue with the contractor, annual inspections have been delayed but are expected to be completed soon. Ultimately, the Facility failed to follow their procedures for the inspection, testing, and maintenance of emergency response equipment.

²² See Emergency Procedure EP-08 – Emergency Equipment.pdf.

LIST OF ATTACHMENTS

Attachment 1: Notice of Inspection and Right to Claim Confidentiality

Attachment 2: Opening Meeting and Interview Sign-In Sheet

Attachment 3: Document Request List

Attachment 4: Photographs and Photograph Log



NOTICE OF INSPECTION

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region VI

Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) §103;
Emergency Planning and Community Right-to-Know Act (EPCRA) §§302-312; and
Clean Air Act §112r Risk Management Program (CAA RMP)

DATE/TIME: 11/13/24 – 11/15/24

FACILITY NAME: Placid Refining Company, LLC

LEAD INSPECTOR (NAME, ADDRESS, PHONE):

Dan Roper
ERC
14655 Arvon Parkway Ste 200
Channahly, VA 20151 571-329-2067

FACILITY ADDRESS:

1940 Highway 1 North
Port Allen, LA 70767

REASON FOR INSPECTION: U. S. EPA is conducting this inspection for the purpose of determining compliance with the requirements of Section 103(e) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Sections 302 through 312 of the Emergency Planning and Community Right-to-Know Act (EPCRA), and Section 112(r) of the Clean Air Act (CAA).

The scope of this inspection may include but is not limited to reviewing and obtaining copies of documents and records; interviews and taking of statements; reviewing of chemical manufacturing, importing, processing, and/or use facilities, including waste handling and treatment operations; taking samples and photographs; and any other inspection activities necessary to determine compliance with the Acts.

INSPECTOR SIGNATURE

RECIPIENT SIGNATURE

NAME

Dan Roper

NAME

Barry Jefferson

TITLE

Inspector

DATE SIGNED

11/13/2024

TITLE

HS & Safety Manager

DATE SIGNED

11/15/24



RECEIPT OF NOTICE OF RIGHT TO CLAIM CONFIDENTIALITY

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region VI

Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) §103;
Emergency Planning and Community Right-to-Know Act (EPCRA) §§302-312; and
Clean Air Act §112r Risk Management Program (CAA RMP)

DATE/TIME: 11/13/24 – 11/15/24

FACILITY NAME: Placid Refining Company, LLC

LEAD INSPECTOR (NAME, ADDRESS, PHONE):

Dan Roper
ERL
14556 Avion Parkway Ste. 200
Chantilly, VA 20151 571-329-2067

FACILITY ADDRESS:

1940 Highway 1 North
Port Allen, LA 70767

Notice of Right to Claim Confidentiality: You may assert a business confidentiality claim covering all or part of the information requested during the course of this inspection, as provided in 40 C.F.R. §2.203(b). To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document over which you make a claim of confidentiality should be marked by either attaching a cover sheet stamped or typed with a legend to indicate the intent to claim confidentiality. The stamp or typed legend or other suitable form of notice should employ language such as "trade secret" or "proprietary" or "company confidential" and indicate a date if any when the information should no longer be treated as confidential.

All confidentiality claims are subject to agency verification and must be made in accordance with 40 C.F.R. §2.208 which provides in part that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; and that the information is not and has not been, reasonably obtainable by legitimate means without your consent.

NOTE: Signature of this Receipt of Notice of Right to Claim Confidentiality verifies only that such notice has been received and does not waive that right.

INSPECTOR SIGNATURE

Dan Roper

RECIPIENT SIGNATURE

[Signature]

NAME

Dan Roper

NAME

BARRY TOTTI

TITLE

Inspector

DATE SIGNED

11/13/2024

TITLE

HSE Manager

DATE SIGNED

11/13/24



INSPECTION ATTENDANCE SHEET

U.S. ENVIRONMENTAL PROTECTION AGENCY Region VI

Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) §103;
Emergency Planning and Community Right-to-Know Act (EPCRA) §302-312; and
Clean Air Act §112r General Duty Clause (GDC) and Risk Management Program (RMP)

DATE/TIME: 11/13/24 - 11/15/24

FACILITY NAME: Placid Refining Company, LLC

LEAD INSPECTOR (NAME, ADDRESS, PHONE):

Dan Roper, E2G
14555 Avian Pkwy Ste. 200
Chantilly, VA 20151

FACILITY ADDRESS:
1940 Highway 1 North
Port Allen, LA 70767

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DATE/TIME: 11/13/24 - 11/15/24

FACILITY NAME: Placid Refining Company, LLC

NAME	AFFILIATION/TITLE	PHONE	EMAIL
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Carroll Marks	Placid	225-389-4087	Carrollmarks@placidrefining.com



DOCUMENT REVIEW/REQUEST LIST
U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VI

Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) § 103;
 Emergency Planning and Community Right-to-Know Act (EPCRA) §§ 302-312; and
 Clean Air Act § 112r Risk Management Program (CAA RMP)

DATE/TIME: 11/13/24 – 11/15/24

FACILITY NAME: Placid Refining Company, LLC

LEAD INSPECTOR (NAME, ADDRESS, PHONE):

FACILITY ADDRESS:
 1940 Highway 1 North
 Port Allen, LA 70767

The following documents were reviewed and/or requested during the inspection unless indicate otherwise. If none of the boxes in the table are checked, the document was only reviewed onsite by the inspection team.

Item No.	Document Request Date	Document Description	Reviewed Prior to Site Visit	Provided for Onsite Review	Send a Copy to EPA for Offsite Review
1	11/13/24	Truck unloading procedure OI-AU-1502	☐	☐	☒
2	11/13/24	Recommendation tracking from 2019 & 2022 API STI Audit	☐	☐	☒
3	11/13/24	Recommendation tracking from 2024 Compliance Audit	☐	☐	☒
4	11/13/24	Incident Investigation Procedure SP-44	☐	☐	☒
5	11/13/24	Training records (6 yrs & 2 cycles) for Blake Womack & Tray Blair	☐	☐	☒
6	11/13/24	FCC Startup Procedure OI-FC-1247	☐	☐	☒
7	11/14/24	SPS for Fire-fighting foam stored on site	☐	☐	☒
8	11/14/24	Any documentation of Borealis laser configuration logic	☐	☐	☒
9	11/14/24	Last two years of fire hose testing/inspection records	☐	☐	☒
10	11/14/24	Last two years of fire truck testing/inspection records	☐	☐	☒
11	11/14/24	Last two years of HPoint Source Detector PM documentation	☐	☐	☒
12	11/15/24	Presentations from 11/13/24, including Refinery overview & MI overview	☐	☐	☒
13			☐	☐	☐
14			☐	☐	☐

PHOTOGRAPH LOG

Facility	Placid Refining Co. L.L.C.
Facility Location	Port Allen, Louisiana
Photographer	Sarah Biscardi
Camera Equipment	OM Digital Solutions TG-7
Inspection and Photograph Date(s)	11/13/2024 – 11/15/2024

Photo ID	Camera ID	Photograph Date	Description
1	PB130001.jpg	11/13/2024	Alky Mitigation Control System near the Alkylation Unit Change House
2	PB130002.jpg	11/13/2024	Alky Mitigation Control System at the South end of the Alkylation Unit
3	PB130003.jpg	11/13/2024	HF Truck Unloading Station
4	PB130004.jpg	11/13/2024	Fire protection/release mitigation spiral nozzles covering the HF Truck Unloading Station at the south end of the Alkylation Unit
5	PB130005.jpg	11/13/2024	HF Truck Unloading Connection Point
6	PB130006.jpg	11/14/2024	Temporary Clamp under Tank E-621
7	PB140007.jpg	11/14/2024	Testing label for the SCBA showing overdue inspection on the north end of the FCC Unit
8	PB140008.jpg	11/14/2024	Testing label for the SCBA showing overdue inspection on the north end of the FCC Unit
9	PB140009.jpg	11/14/2024	Exchanger E-532 where a drain on the four-inch line on the bottom of the exchanger was identified as missing from the associated P&ID
10	PB140010.jpg	11/14/2024	Overview of heat exchanger bank in the FCC Unit
11	PB140011.jpg	11/14/2024	PSV on Exchanger E-590 identified to be missing a car seal
12	PB140012.jpg	11/14/2024	Overview of Exchanger E-590

Inspection Date: 11/13 – 15/2024
Facility: Placid Refining Co, LLC.

R6 Enforcement and Compliance Assurance Division
PHOTOGRAPH LOG



Photograph 1 - File: PB130001.JPG
Alky Mitigation Control System near the Alkylation Unit Change House.

Inspection Date: 11/13 – 15/2024

Facility: Placid Refining Co, LLC.

**R6 Enforcement and Compliance Assurance Division
PHOTOGRAPH LOG**



Photograph 2 - File: PB130002.JPG

Alky Mitigation Control System at the South end of the Alkylation Unit.

Inspection Date: 11/13 – 15/2024

Facility: Placid Refining Co, LLC.

**R6 Enforcement and Compliance Assurance Division
PHOTOGRAPH LOG**



Photograph 3 - File: PB130003.JPG
HF Truck Unloading Station.

Inspection Date: 11/13 – 15/2024

Facility: Placid Refining Co, LLC.

R6 Enforcement and Compliance Assurance Division

PHOTOGRAPH LOG



Photograph 4 - File: PB130004.JPG

Fire protection/release mitigation spiral nozzles covering the HF Truck Unloading Station at the south end of the Alkylation Unit.

Inspection Date: 11/13 – 15/2024

Facility: Placid Refining Co, LLC.

R6 Enforcement and Compliance Assurance Division
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Photograph 5 - File: PB130005.JPG
HF Truck Unloading Connection Point.

Inspection Date: 11/13 – 15/2024

Facility: Placid Refining Co, LLC.

**R6 Enforcement and Compliance Assurance Division
PHOTOGRAPH LOG**



Photograph 6 - File: PB130006.JPG
Temporary Clamp under Tank E-621.

Inspection Date: 11/13 – 15/2024

Facility: Placid Refining Co, LLC.

**R6 Enforcement and Compliance Assurance Division
PHOTOGRAPH LOG**



Photograph 7 - File: PB140007.JPG

Testing label for the SCBA showing overdue inspection on the north end of the FCC Unit.

Inspection Date: 11/13 – 15/2024
Facility: Placid Refining Co, LLC.

**R6 Enforcement and Compliance Assurance Division
PHOTOGRAPH LOG**



Photograph 8 - File: PB140008.JPG

Testing label for the SCBA showing overdue inspection on the north end of the FCC Unit.

Inspection Date: 11/13 – 15/2024

Facility: Placid Refining Co, LLC.

**R6 Enforcement and Compliance Assurance Division
PHOTOGRAPH LOG**



Photograph 9 - File: PB140009.JPG

Exchanger E-532 where a drain on the four-inch line on the bottom of the exchanger was identified as missing from the associated P&ID.

Inspection Date: 11/13 – 15/2024

Facility: Placid Refining Co, LLC.

**R6 Enforcement and Compliance Assurance Division
PHOTOGRAPH LOG**



Photograph 10 - File: PB140010.JPG

Overview of heat exchanger bank in the FCC Unit.

Inspection Date: 11/13 – 15/2024

Facility: Placid Refining Co, LLC.

**R6 Enforcement and Compliance Assurance Division
PHOTOGRAPH LOG**



Photograph 11 - File: PB140011.JPG

PSV on Exchanger E-590 identified to be missing a car seal.

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Photograph 12 - File: PB140012.JPG
Overview of Exchanger E-590.