



Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	04/21/2022	
Media Program:	Air	
Regulatory Program(s)	Title V	
Company Name:	Occidental Chemical Corporation	
Facility Name:	Convent Facility	
Facility Physical Location:	7377 Highway 3214	
(city, state, zip code)	Convent, LA 70723	
Mailing address:	7377 Highway 3214	
(city, state, zip code)	Convent, LA 70723	
County/Parish:	St. James	
Facility Phone Number	225-563-9200	
Facility Contact:	Chad Orillion	Environmental Manager
	Chad_Orillion@oxy.com	
FRS Number:	110000597328	
Identification/Permit Number:	LDEQ AI 3544; Permit 2560-00019-V7	
Media Identifier Number:	AFS 22-09300019	
NAICS:	2812, 2869	
SIC:	325180, 213112	
Personnel participating in inspection:		
Sarah Frey	EPA ECD-AT	Inspector
Chris Williams	EPA OECA-AED	Chemical Engineer
Richard Helmich	EPA NEIC	Chemist
David Mahoney	EPA NEIC	Technical Coordinator
Ali Gitipour	EPA ORD	Engineer
Sophia Ong	LDEQ	Environmental Scientist
Steve Welch	OxyChem	Plant Manager
Mark Raimondi	OxyChem	Production Manager
Jake Valenti	OxyChem	Safety and Security Manager
Courtney Rome	OxyChem	Technical Manager
Matt Delicata	OxyChem	Production Superintendant
EPA Lead Inspector Signature/Date	<i>Sarah Frey</i> Sarah Frey	7/29/2022 Date
Supervisor Signature/Date	 James Leathers	 Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA inspectors Sarah Frey (Region 6) and Chris Williams (Headquarters), accompanied by Richard Helmich (National Enforcement Investigations Center, “NEIC”), David Mahoney (NEIC), and Ali Gitipour (Office of Research and Development), arrived at Occidental Chemical Corporation’s Convent Facility (“OxyChem”) at 8:45 am on April 21, 2022 for an unannounced inspection. We were accompanied by Louisiana Department of Environmental Quality inspector Sophia Ong. We met Steve Welch/Plant Manager, Courtney Rome/Technical Manager, Mark Raimondi/Production Manager, Jake Valenti/Safety and Security Manager, and Matt Delicata/Production Superintendent. Credentials were presented to Mr. Welch and we informed him that this was an EPA inspection to evaluate potential sources of excess emissions using EPA’s Geospatial Measurement of Air Pollution (“GMAP”) vehicle and evaluate compliance with the facility’s Title V Permit and the Clean Air Act. The scope of the inspection is a partial compliance evaluation (“PCE”). This inspection occurred as part of the Administrator’s Multi-Scale Monitoring Project called the Pollution Accountability Team (“PAT”).

FACILITY DESCRIPTION

OxyChem (the “Facility”) is a chemical manufacturing facility that operates 24 hours a day, seven days a week under Permit Number 2560-00019-V7 issued June 27, 2019. The Facility employs approximately 125 employees and 80 contractors. The Facility was shutdown for 11 months during the COVID-19 pandemic, but returned to full operations in May 2021.

The Facility consists of three basic operations: a chlor-alkali plant utilizing modified asbestos diaphragm cells to produce chlorine, sodium hydroxide and hydrogen, an Ethylene Dichloride (“EDC”) plant utilizing direct chlorination technology to produce EDC, and steam generating facilities that provide support to the chlor-alkali and EDC plants. Final product EDC is stored in one of four in-service EDC storage tanks (fixed roof) where it awaits shipment via ships or barges. Emissions from the EDC tanks are routed through a common header to a scrubber. The main control device is incineration at a boiler system.

Section II - OBSERVATIONS

The NEIC GMAP was driven by Mr. Mahoney and the instruments were operated by Mr. Helmich and Mr. Gitipour. A facility representative, Mr. Raimondi, was present in the GMAP. Inspectors Dr. Frey, Mr. Williams, and Ms. Ong were escorted by Mr. Welch in a separate vehicle. Mr. Raimondi guided the GMAP through the drivable roads at the Facility, where air pollution data was collected and recorded. A full report from the GMAP will be issued by NEIC at a later date.

Near the boilers, concentrations of methane emissions were detected at approximately 0.6 parts-per-million above background. No other emissions were detected during the site tour. The tour concluded around 11am.

Section III – AREAS OF CONCERN

Richard Helmich, Sarah Frey, and Chris Williams conducted a closing conference at Occidental Chemical Corporation's Convent Facility at 11:05 am on April 21, 2022 with Mr. Welch and Mr. Raimondi. During the closing conference, Mr. Helmich reviewed the emissions detected by the GMAP during the inspection. We observed no areas of concern at the time of the inspection and departed the facility at 11:15 am.

Section IV – FOLLOW UP

No additional information was received by EPA after exiting the Facility on April 21, 2022.

Section V – LIST OF APPENDICES

No Appendices.