

**Region 6 - Enforcement & Compliance Assurance Division**  
**INSPECTION REPORT**

|                                        |                                                                                                                                                          |                                 |
|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| Inspection Date(s):                    | February 22-25, 2022                                                                                                                                     |                                 |
| Media Program:                         | Air                                                                                                                                                      |                                 |
| Regulatory Program(s)                  | Clean Air Act Section 112(r) and 40 Code of Federal Regulations (C.F.R.) Part 68 Chemical Accident Prevention Provisions – Risk Management Program (RMP) |                                 |
| Company Name:                          | <b>Mosaic Fertilizer, LLC / Tampa Port Services, LLC (TPS)</b>                                                                                           |                                 |
| Facility Name:                         | <b>Faustina Plant</b>                                                                                                                                    |                                 |
| Facility Physical Location:            | 9959 HWY 18                                                                                                                                              |                                 |
| (city, state, zip code)                | St. James, Louisiana 70086                                                                                                                               |                                 |
| Mailing address:                       | 9959 HWY 18                                                                                                                                              |                                 |
| (city, state, zip code)                | St. James, Louisiana 70086                                                                                                                               |                                 |
| County/Parish:                         | St. James Parish                                                                                                                                         |                                 |
| Facility Phone Number                  | (225) 474-9700                                                                                                                                           |                                 |
| Facility Contact:                      | Ronald L. Yasurek                                                                                                                                        | General Manager                 |
|                                        | Ronald.Yasurek@mosaicco.com                                                                                                                              |                                 |
| FRS Number:                            | 1100223240337                                                                                                                                            |                                 |
| Identification/Permit Number:          | CAA Title V Permit; Air Operating Permit ID: 2560-00298-V0                                                                                               |                                 |
| Media Identifier Number:               | RMP ID: 1000 0011 7651                                                                                                                                   |                                 |
| NAICS:                                 | 325312 (Phosphatic Fertilizer Manufacturing)                                                                                                             |                                 |
| SIC:                                   | 2819 (Industrial Inorganic Chemicals); 2873 (Nitrogenous Fertilizers); 2874 (Phosphatic Fertilizer)                                                      |                                 |
| Personnel participating in inspection: |                                                                                                                                                          |                                 |
| Justin McDowell                        | US EPA Region 6                                                                                                                                          | Inspector / Enforcement Officer |
| Keri Meyers                            | LDEQ                                                                                                                                                     | Inspector                       |
| Bryn LeBlanc                           | LDEQ                                                                                                                                                     | Inspector                       |
| Glen Jenkins                           | LDEQ                                                                                                                                                     | Inspector                       |
| Ronald Yasurek                         | Mosaic                                                                                                                                                   | General Manager                 |
| Tom Miller                             | Mosaic                                                                                                                                                   | Sr. Manager Operations          |
| Neisy Ellis                            | Mosaic                                                                                                                                                   | Sr. Manager PSM MMS             |
| Matt Duhe                              | Mosaic                                                                                                                                                   | Sr. Manager Operations          |
| Joshua Baldassaro                      | Mosaic                                                                                                                                                   | Production Superintendent       |
| Kateryna Gliebova                      | Mosaic                                                                                                                                                   | PSM Engineer                    |
| Kristin Rosendale                      | Mosaic                                                                                                                                                   | Sr. Safety Specialist           |
| Mickey Kraemer                         | Mosaic                                                                                                                                                   | Safety Lead                     |
| EPA Lead Inspector<br>Signature/Date   |                                                                                                                                                          |                                 |
|                                        | Justin McDowell                                                                                                                                          | Date                            |
| Supervisor<br>Signature/Date           |                                                                                                                                                          |                                 |
|                                        | Samuel Tates                                                                                                                                             | Date                            |

## **Section I – INTRODUCTION**

### **PURPOSE OF THE INSPECTION**

I, United States Environmental Protection Agency (EPA) Region 6 inspector Justin McDowell, and the Louisiana Department of Environmental Quality (LDEQ) inspectors Keri Meyers, Bryn LeBlanc, and Glen Jenkins arrived at the Mosaic Fertilizer, LLC – Faustina Plant (Mosaic Faustina) at 11:30 AM on Tuesday, February 22, 2022, for an announced inspection. I met with Tom Miller, Neisy Ellis, Ron Yasurek, Matt Duhe, Joshua Baldassaro, Kateryna Glielova, and Mickey Kraemer for an opening meeting. I presented my credentials and informed Mosaic Faustina personnel that this was an EPA inspection to determine compliance with the federal Chemical Accident Prevention Program. The scope of the inspection was a partial compliance evaluation (PCE), which included an evaluation of the facility's compliance with the Clean Air Act (CAA) Section 112(r), the Chemical Accident Prevention Provisions in 40 C.F.R. Part 68, and the General Duty Clause. Mosaic Faustina's Risk Management Plan (RMP) is listed as a Program Level Three (3), Title V facility. I inquired if an employee representative was available pursuant to section 112(r)(6)(L) of the CAA to participate in this inspection and was informed that the Mosaic Faustina Plant is a non-union facility.

### **FACILITY DESCRIPTION**

The Mosaic Faustina Facility produces granular monoammonium phosphate (GMAP) and diammonium phosphate (DAP) products. The raw materials used in this process include molten sulfur, phosphate rock, anhydrous ammonia, air, and steam. Natural gas mixtures are used as a fuel source for some equipment within the granulation facilities. Additionally, the Faustina Facility manufactures anhydrous ammonia through a catalytic reaction involving natural gas, steam, and air; the ammonia is used within the granulation facilities, stored, and shipped offsite. The manufacturing process for anhydrous ammonia also includes carbon dioxide as a byproduct. The regulated substances involved in these processes at the Faustina Facility that exceed the threshold quantities as described by the Risk Management Program ("RMP") rule include anhydrous ammonia and a flammable gas mixture generated in the ammonia plant. Anhydrous ammonia is stored in a large, refrigerated storage tank surrounded by a dike. In addition to the anhydrous ammonia manufactured in the facility's ammonia plant, the Faustina Facility also receives anhydrous ammonia via an underground commercial pipeline, as well as, by ship and barge at the Facility's river dock on occasion. Ammonia is loaded into tanker trucks for transport at the ammonia truck loading facility. Natural gas is received at the facility by an underground commercial pipeline that is connected by piping to the ammonia plant.

## **Section II – OBSERVATIONS**

On Wednesday, February 23, 2022, Glen Jenkins and I were accompanied by Mosaic personnel to conduct a facility tour. The Ammonia plant was in the process of start-up, so we did not tour that process area. I toured the Ammonia storage area, truck and barge loading docks, piping inlet to the facility, and received a general overview of the facility. Prior to the facility tour, I completed the facility's visitor safety video and discussed relevant process safety information including block flow diagrams and piping and instrumentation diagrams (P&IDs) that assisted during the tour. Unrelated to the tour, the facility did lose power at the administration building; however, this did not impact plant operations.

## Subpart A – General

**40 C.F.R. § 68.10 Applicability** – Mosaic Faustina is the owner/operator of a stationary source that has more than threshold quantities of one regulated toxic substance (ammonia) and one regulated flammable substance (flammable mixture- hydrogen and methane) in a covered process, as listed in 40 C.F.R. § 68.130; therefore, Mosaic Faustina is subject to the Chemical Accident Prevention Provisions. Mosaic Faustina has a Clean Air Act Title V permit and an Air Operating Permit (ID# 2560-00021-V6) and is classified under the North American Industrial Classification System (NAICS) code 325312 (Phosphatic Fertilizer Manufacturing). Mosaic Faustina is subject to the Occupational Safety and Health Administration (OSHA) process safety management (PSM) standard, 29 C.F.R. § 1910.119, and has one Program Level Three (3) process under OSHA PSM.

**40 C.F.R. § 68.10 Program Eligibility** – Mosaic Faustina re-submitted an RMP registration, as required under 40 C.F.R. § 68.190 (b)(5), after completing a revised process hazard review due to a process change, on November 5, 2020. Mosaic Faustina's next registration re-submittal is due on November 5, 2025, unless an update or correction is required by 40 C.F.R. § 68.190 or 40 C.F.R. § 68.195 prior to the five-year renewal date.

**40 C.F.R. § 68.12 General requirements** – The re-submitted RMP plan requires the facility to: develop and implement a management system; conduct a hazard assessment; implement the prevention requirements of 40 C.F.R. § 68.65 - § 68.67; develop and implement an emergency response program; and include the data elements from 40 C.F.R. § 68.175 in their RMP.

**40 C.F.R. § 68.15 Management** – Mosaic Faustina has developed a management system to oversee the implementation of risk management program elements but failed to document the lines of authority defined through an organization chart or similar document. **[AOC 1 – 40 C.F.R. § 68.15(c)]**

## Subpart B – Hazard Assessment

**40 C.F.R. § 68.20 Applicability** – Mosaic Faustina has one Program Level 3 process subject to this subpart. The facility is required to prepare an off-site consequence analysis and complete the five-year accident history.

**40 C.F.R. § 68.22 Offsite Consequence Analysis Parameters** – Mosaic Faustina used RMP\*Comp™ as the technique for modeling the release scenarios. For both the worst-case and alternative case scenarios involving toxics and flammables, the facility used the endpoints provided in Appendix A of 40 C.F.R. Part 68, appropriate wind speeds and stability classes, ambient temperatures and humidity values, values for height of the release, and surface roughness values for the release scenario analyses.

**40 C.F.R. § 68.25 Worst-case Release Scenario Analysis** – Mosaic Faustina analyzed and reported in the RMP one worst-case release scenario, estimated to create the greatest distance to endpoint, and resulting from an accidental release of a regulated toxic substance from a covered process under worst-case conditions and one worst-case release scenario, estimated to create the greatest distance to endpoint, and resulting from an accidental release of a regulated flammable substance from a covered process under worst-case conditions. The worst-case release quantity was determined as the greatest amount held in a single vessel, considering administrative controls that limit the maximum quantity released.

**40 C.F.R. § 68.28 Alternative Release Scenario Analysis** – Mosaic Faustina identified and analyzed one toxic release scenario (liquid spill and vaporization) and one alternative release scenario to represent all flammable substances held in a covered process, using a scenario that is likely to occur (vapor cloud explosion).

**40 C.F.R. § 68.30 Defining Offsite Impacts - Population** – Mosaic Faustina uses the MARPLOT mapping program to define the affected off-site population. The documentation describes how the facility estimated the population that would be affected in the distance to endpoint in the RMP, based on a circle with the point of release at the center. It also identified the presence of institutions, parks, and recreational areas, major commercial, office, and industrial buildings in the RMP. The facility used the most recent Census data (estimated to two significant digits) in the documentation.

**40 C.F.R. § 68.33 Defining Offsite Impacts - Environment** – Mosaic Faustina identified environmental receptors within a circle where its center is the point of the release and a radius determined by the distance to endpoint. The plant relied on information provided on local United States Geographical Survey (U.S.G.S.) maps and data to identify environmental receptors.

**40 C.F.R. § 68.36 Review and Update** – Mosaic Faustina reviewed and updated the off-site consequence analyses at least once every five years.

**40 C.F.R. § 68.39 Documentation** – For the worst-case and alternative release scenarios, a description of the vessel or pipeline and substance selected, assumptions and parameters used, the rationale for selection, the anticipated effect of the administrative controls and passive mitigation on the release quantity, and rate were provided.

**40 C.F.R. § 68.42 Five-year accident history** – Mosaic Faustina has not reported any accidental releases from covered processes that resulted in one or more of the following: on-site deaths, injuries, significant property damage on-site, known off-site deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage in its accident history.

#### **Subpart D – Program 3 Prevention Program**

**40 C.F.R. § 68.65 Process Safety Information** – Mosaic Faustina compiled written process safety information, which includes information pertaining to the hazards of the regulated substances used or produced by the process, information pertaining to the technology of the process, and information pertaining to the equipment in the process. I reviewed the Safety Data Sheet for the process chemical Ammonia (anhydrous). The detailed process safety information that was provided contains the following data for the hazards of the substance used: toxicity information, permissible exposure limits, physical data, reactivity data, corrosivity data, thermal and chemical stability data, and the hazardous effects of inadvertent mixing of materials that could foreseeably occur. I reviewed documentation concerning the technology of the process, which included the Faustina Production block flow diagram, as well as, the Ammonia Plant Process block flow diagram, process chemistry, maximum intended inventory, safe upper and lower limits for such items as temperatures, pressures, flows, or compositions and an evaluation of the consequences of deviation (found on SOCLs – standard operating conditions and limits). I reviewed documentation pertaining to the equipment of the process including materials of construction, piping and instrumentation diagrams (P&IDs), electrical classification, relief system design and design basis (pressure safety valve (PSV) systems), ventilation system design, design codes and standards employed, material and energy balances, and safety systems (process interlocks, safety

instrumentation systems – SIS, fire systems, deluge systems and lower explosive limit (LEL) alarm systems). The facility failed to document that equipment complies with recognized and generally accepted good engineering practices. The facility failed to have an American Petroleum Institute (API) 580 inspector actively involved in the process and assessments of Risk Based Inspections (RBI). RBI data is not being documented to get corrosion rates or damage mechanisms to develop the RBI Program. In addition, weld records for 2019 repairs on 104-D and test reports were not maintained, only pictures of weld repairs. Progressive records need to be maintained for the life of the vessel per API 510. RBI assessment data was not documented for Ammonia piping. Previous inspection records for circuits could not be provided to inspectors during the audit and these records are what Mosaic personnel claimed to have used in July 2020 for the RBI assessment on Ammonia piping. **[AOC 2 – §68.65(d)(2)]**

**40 C.F.R. § 68.67 Process hazard analysis (PHA)** – Mosaic Faustina provided the PHA procedure (revision 3) for review. Mosaic performed initial PHAs that identified, evaluated, and controlled the hazards involved in the processes. The facility completes each PHA based on the five-year cycle from the previous PHA and the PHA is divided among the covered process units/work areas. The PHAs performed use the Hazard and Operability Study (HAZOP) and Layers of Protection Analysis (LOPA) technologies to identify hazards. The PHAs reviewed (2016 and 2021 Ammonia Plant PHAs, 2018 Ammonia Storage PHA, and the 2020 Ammonia Truck Loading Station PHA) addressed the hazards of the process; identification of any incident that had a likely potential for catastrophic consequences; engineering and administrative controls applicable to hazards and their interrelationships; consequences of failure of engineering and administrative controls; stationary source siting; human factors; and a qualitative evaluation of a range of the possible safety and health effects of failed controls. PHAs were performed by a team that consisted of both facility and third-party staff. Mosaic has failed to establish a system to promptly address the team's findings and recommendations; assure that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete actions as soon as possible; develop a written schedule of when these actions are to be completed; communicate the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions. The 2016 Ammonia Plant PHA has 12 open findings, with several dated to be due by 12/31/2025. There are an additional 14 open PHA findings from the 2018, 2019 and 2020 PHAs. The 2016 Ammonia Plant PHA did not track 62 of 169 action items. Of the 107 that were tracked, 83 were not completed over 2.5 years after the PHA meetings were completed. Several open findings had a residual risk ranking of red marked in the PHAs. **[AOC 3 – §68.67(e)]** PHAs have been revalidated at least every five years after the completion of the initial or previous PHA. (Figure 1) Mosaic has retained the PHA updates or revalidations for each process covered, as well as, the resolution of recommendations for the life of the process.

Figure 1.

| PHA Schedule              |                                 |                              |
|---------------------------|---------------------------------|------------------------------|
| PHA                       | Finalized                       | Session Dates                |
| Ammonia Plant             | December 2011                   | July 18- August 1, 2011      |
|                           | February 1, 2018                | July 6-21, 2016              |
|                           | November 8, 2021 (draft report) | May 10- July 15, 2021        |
| Granulation / Dry Storage | October 22, 2009                | October 22, 2009             |
|                           | March 2015                      | October 14-17, 2014          |
|                           | May 28, 2020                    | August 19-September 19, 2019 |
| Ammonia Storage           | August 2013                     | July 16-17, 2013             |
|                           | November 29, 2018               | July 9-13, 2018              |

**40 C.F.R. § 68.69 Operating Procedures** – Mosaic Faustina has developed and implemented written operating procedures that provide instructions or steps for conducting activities associated with each covered process, consistent with the safety information. Mosaic provided a list of operating procedures used at the facility. The operating procedures I reviewed addressed steps for each operating phase, operating limits, safety and health considerations, and safety systems with their functions. Operating procedures are kept on the facility’s intranet website (DOCULINK) and the most recent versions as hard copy inside the control room. Mosaic failed to certify annually that operating procedures are current and accurate. There were No Dry Products/Granulation annual certifications between 2014-2018. This was self-identified prior to the inspection on a “Note to File” document, as well as, mentioned in the most recent Compliance Audit. **[AOC 4 – §68.69(c)]** Mosaic has developed and implemented 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.

Figure 2.

| Operating Procedure Certifications |                             |                            |
|------------------------------------|-----------------------------|----------------------------|
| Ammonia Plant                      | Shipping/ Material Handling | Granulation / Dry Products |
| January 22, 2019                   | February 8, 2019            | 2014-2018 MISSING          |
| January 29, 2020                   | February 4, 2020            | December 10, 2019          |
| January 28, 2021                   | February 9, 2021            | February 18, 2020          |
| January 10, 2022                   | January 20, 2022            | February 2, 2021           |
|                                    |                             | January 20, 2022           |

**40 C.F.R. § 68.71 Training** – Mosaic Faustina discussed their training program and progressions. The facility provided a list of operators in the ammonia plant. The operators were selected at random to review their training records. Mosaic failed to provide initial training for Operator L.V. in the ammonia plant. **[AOC 5 – § 68.71 (a)]** Mosaic failed to provide refresher training at least every three years to each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process. Consultation with the employees on the appropriate frequency of refresher training was not documented. **[AOC 6 – § 68.71 (b)]** Mosaic failed to prepare a record that contains the identity of the employee, the date of training, and the means used to verify that the employee understood the training. Some of the operator training exams were not fully completed and had blank fields. It was difficult to determine if the operator received and understood the training required. For employees working prior to 2016, a training certification statement was provided inside each file that stated “Effective 1/1/2016, the initial testing for each job qualification in the Ammonia Plant will be changed due to the lack of integrity of the previous testing format and procedure. The new testing format procedure will not consist of multiple-choice testing format but will now be a fill in the blank testing format. The test questions will be pulled from a bank of questions, where the number of questions asked on any qualifying tests, depends on the particular job classification. For example: Front End, Back End, Compressor Deck and Board Certifications. This new testing format and procedure is a more thorough testing procedure, which will show the knowledge and skill level of the qualifying employee.” This was not consistent with the training records reviewed. For example, there were still multiple-choice tests given. **[AOC 7 – § 68.71 (c)]**

**40 C.F.R. § 68.73 Mechanical Integrity** – Mosaic Faustina provided mechanical integrity procedures for selected equipment. Mosaic failed to establish and implement written procedures for vibration, thermography, or oil analysis procedures for pumps/rotating equipment. There were no procedures for

the maintenance of rupture disks; maintenance of SIS and individual components; and no procedures for Emergency Shut Down (ESD) maintenance testing and frequency. **[AOC 8 – § 68.73 (b)]** Mosaic failed to train each employee involved in maintaining the on-going integrity of process equipment in an overview of that process and its hazards and in the procedures applicable to the employee's job tasks to assure that the employee can perform the job tasks in a safe manner. Mosaic did not train the following I&E (instrumentation and electrical) technicians in the procedures applicable to the employee's job tasks to assure that the employee can perform the job tasks in a safe manner – MM; CH; MS **[AOC 9 – § 68.73 (c)]** Mosaic failed to provide internal inspections were ever performed prior to 2019 for T-1. Also, there were no internal inspections ever performed on H-1 (scheduled for upcoming turnaround) and no internal inspections for 114-F MDEA prior to 2020. **[AOC 10 § – 68.73 (d)(1)]** Mosaic failed to ensure inspection and testing procedures follow recognized and generally accepted good engineering practices (RAGAGEP). An API 510 certified inspector was not used for the 2019 internal inspection of vessel 104-D High Temperature Shift Converter. API 510 *Pressure Vessel Inspection Code: In-service Inspection, Rating, Repair, and Alteration* requires that the internal inspection shall be performed by an inspector. Other properly qualified personnel (e.g., NDE examiner) may assist the inspector (but not replace) in the internal inspection, when approved and under the direction of the authorized inspector. CW performed the 2019 internal inspection of 104-D, but CW was only a level II technician and was not API 510 certified at that time, which does not follow RAGAGEP. **[AOC 11 – § 68.73 (d)(2)]** Mosaic failed to ensure the frequency of inspections and tests of process equipment was consistent with applicable manufacturers' recommendations and good engineering practices, and more frequently if determined to be necessary by prior operating experience. There were no internal inspections for H-2 since 2000; quarterly thermography inspections were not taken for equipment 109J and 109JA. Overdue equipment inspections for piping, vessels (internals and externals) are as following: 74 piping circuits overdue for inspection; 19 pieces of equipment overdue for external inspections; 27 pieces of equipment overdue for internal inspections; monthly vibration not done for pumps P1 and P2 in January, April, August, October, and November of 2021; quarterly thermography for pump P2 has not been done since July 2021; monthly vibration testing missed in May 2021 for pumps P109J and P109JA; 2018 external inspection for 105D performed two years late; H2 and H1 thickness readings performed late; H2 internal inspection last performed in 2000 and was due in 2010, but was missed and is still overdue; external visuals performed 4 years late in 2020 for H1 and H2; 104D thickness history does not follow frequency; 121-C thickness baseline taken in 2011 but the next one due in 2016 was missed and the next thickness reading not taken until 2022; 121-C internal inspection last performed in 2006 and was due in 2016, but was missed and is still overdue. **[AOC 12 – § 68.73 (d)(3)]** Mosaic failed to document each inspection and test that has been performed on process equipment. Documentation was missing for the following: previous inspections and thickness history of ammonia piping; 2018 external inspection for 105-D; 2017 repair and test reports were missing date, inspector, and other result information for relief valves 400A; 400B; and 401. **[AOC 13 – § 68.73 (d)(4)]** Mosaic failed to correct deficiencies in equipment that are outside acceptable limits. An engineering firm in the 2021 PHA noted that relieve valve RV-100-146 is not sized properly. AON RC# RC136092; Due: 1/ 31/ 2021. **[AOC 14 – § 68.73 (e)]**

**40 C.F.R. § 68.75 Management of Change (MOC)** – Mosaic Faustina has established written procedures to manage changes to process chemicals, technology, equipment, procedures, and stationary sources that affect a covered process. MOCs are typically started by operations or maintenance staff who have successfully completed computer based MOC training. MOCs are managed to completion in the MAXIMO database. Mosaic has failed to implement MOC procedure for MOC: U262515034 - Install clamp on flange RV-0100-001A. This MOC is listed as a "Permanent MOC". The MOC Procedure defines a Temporary Change as an approved change that is made with the intent to revert to original or designed conditions. A temporary change: Only remains in effect for a predetermined period of time; Converts to

a permanent change if the decision is made not to return to original conditions. Temporary changes are subject to review after a maximum of 6 months. MOC MPH3213 - Install gate valve with blind on ¾" line off of NH3 Deaerator (condensate/ steam) - Permanent MOC has blank fields and is incomplete. (February 23, 2021). **[AOC 15 – § 68.75 (a)]** Employees involved in operating a process and maintenance and contract employees whose job tasks will be affected by a change in the process were not trained in the change prior to start-up of the process or affected part of the process. For MOC 262101420 and associated PSSR, the start-up occurred before training, operational procedures, and process safety information were updated. Start-up: 9/19/2017; Training: 9/21/2017; SOP revised: 10/4/2017. **[AOC 16 – § 68.75 (c)] [AOC 17 – § 68.75 (d)] [AOC 18 – § 68.75 (e)]**

**40 C.F.R. § 68.77 Pre-startup Safety Review** – Mosaic Faustina failed to confirm that prior to the introduction of regulated substances to a process, that the training of each employee involved in operating a process has been completed. For MOC 262101420 and associated PSSR, the startup occurred before training and process safety information was updated. Start-up: 9/19/2017; Training: 9/21/2017; SOP revised: 10/4/2017.

**40 C.F.R. § 68.79 Compliance Audits** – Mosaic Faustina certified that they have evaluated compliance with the provisions of this subpart at least every three years to verify that procedures and practices developed under this subpart are adequate and are being followed in its two most recent audits that took place February 22-26, 2016, and February 11-13, 2019. Mosaic failed to document that the compliance audit was conducted by at least one person knowledgeable in the process. The audit team listed on the final report for the 2019 Compliance Audit lists James Thompson and James Klein, both from ABS Consulting and does not list a facility employee. ABS Consulting noted this as a finding in the 2021 Compliance Audit. **[AOC 19 – § 68.79 (b)]** Mosaic failed to promptly determine and document an appropriate response to each of the findings of the compliance audit and that any deficiencies have been corrected. For the 2019 compliance audit, 6 of 20 findings are still open, several were closed late, and it could be argued that they should have been closed on time. In addition, there are a few repeat findings from the 2016 compliance audit. The 2016 audit had 6 findings that were not completed promptly and past the due dates. **[AOC 20 – § 68.79 (d)]**

**40 C.F.R. § 68.81 Incident Investigation** – Mosaic Faustina uses the INTELEX database for managing incident investigations covered by this subpart. Mosaic failed to investigate each incident, which resulted in, or could reasonably have resulted in, a catastrophic release. Incident RC171212 involved a small fire at 103-C and was not investigated. The event summary was a small fire on the west head of the 103-C waste head boiler. The fire was extinguished with a steam ring. According to the facility, this has occurred more than once. Incident RC157972 involved a natural gas leak and was not investigated. This event involved a natural gas leak on the inlet piping to PIC-4. **[AOC 20 – § 68.81 (a)]**

**40 C.F.R. § 68.83 Employee Participation** – Mosaic Faustina has developed a written plan of action regarding the implementation of employee participation required by this section, which is integrated into the program elements. The plant has consulted with employees and their representatives on the conduct and development of the process hazard analysis and on the development of the other elements of process safety management in the Chemical Accident Prevention Provisions. The plant has provided access to the process hazard analysis and all other information required to be developed under this rule.

**40 C.F.R. § 68.85 Hot Work Permit** – Mosaic Faustina provided their hot work procedure that detailed guidance for hot work that generates an external flame or spark. I reviewed several hot work permits that involved an external flame or spark in the process area. The permits reviewed documented that fire

prevention requirements were implemented, as well as, the dates authorized for hot work and the object(s) upon which hot work would be performed. Permits are retained for 60 days.

**40 C.F.R. § 68.87 Contractors** – Mosaic Faustina uses the ISNetWorld contractor database to evaluate information regarding contractor's safety performance and programs. All contractors must have a minimum grade of a "B" or an approved waiver to be permitted to work onsite. I was provided with the facility's Contractor Safety Management Process procedure. All contractors report to the Safety Council to receive basic and site-specific training prior to gaining access to work onsite. The Safety Council provides contractors who have successfully completed training a Transportation Workers Identification Card (TWIC) card that is valid for one year. I was provided with the syllabus and training curriculum Mosaic provides to the Safety Council on behalf of their facility. I reviewed the status of several contractors actively working onsite in ISNetWorld. The Business Unit of Mosaic provides a monthly list of approved contractors as a means of periodically evaluating each contractor's ability to work onsite.

#### **Subpart E – Emergency Response**

**40 C.F.R. § 68.90 Applicability** – Mosaic Faustina is designated as a responding stationary source.

**40 C.F.R. § 68.93 Emergency Response Coordination Activities** – Mosaic Faustina has coordinated response needs with local emergency planning and response organizations to determine how the covered processes at the facility are addressed in the emergency response plan. The facility provided documentation of coordination with the St. James Parish Local Emergency Planning Committee (LEPC) and local fire department (for structural fires only).

**40 C.F.R. § 68.95 Emergency Response Program** – Mosaic Faustina has developed and implemented an emergency response program for the purpose of protecting public health and the environment. Mosaic has 24 emergency response team members with various skills set, 7 employees trained in incident command and the use of Industrial Emergency Services (IES) for supplemental assistance. The program includes the following elements: (1) An emergency response plan, which shall be maintained at the stationary source and contain at least the following elements: (i) Procedures for informing the public and the appropriate federal, state, and local emergency response agencies about accidental releases via the code red system; (ii) Documentation of proper first-aid and emergency medical treatment necessary to treat accidental human exposures via SDSs; and (iii) Procedures and measures for emergency response after an accidental release of a regulated substance via the code red system; (2) Procedures for the use of emergency response equipment and for its inspection, testing, and maintenance (IES is used as a third-party for the inspection and testing of emergency response equipment); (3) Training for all employees in relevant procedures (includes EMR, HAZMAT, confined space, incident, fire, and incident command); and (4) Procedures to review and update, as appropriate, the emergency response plan to reflect changes at the stationary source and ensure that employees are informed of changes. The owner or operator shall review and update the plan as appropriate based on changes at the stationary source or new information obtained from coordination activities, emergency response exercises, incident investigations or other available information, and ensure that employees are informed of the changes.

**40 C.F.R. § 68.96 Emergency Response Exercises** – Mosaic Faustina conducts quarterly and tabletop drills for emergency response and security purposes in coordination with the local Emergency Operations Center (EOC).

## **Subpart G – Risk Management Plan**

**40 C.F.R. § 68.190 Updates** – Mosaic Faustina’s RMP was re-submitted on November 5, 2020, after a Revised PHA/Hazard Review due to a process change, pursuant to 40 C.F.R. § 68.190 (b)(5).

**40 C.F.R. § 68.195 Required corrections** – Mosaic Faustina’s next RMP registration re-submission is due by November 5, 2025, unless an update or correction is required by 40 C.F.R. § 68.190 or 40 C.F.R. § 68.195 prior to the five-year renewal deadline.

## **Section III – AREAS OF CONCERN**

### **AOC 1 – 40 C.F.R §68.15 (c) Management**

“(c) When responsibility for implementing individual requirements of this part is assigned to persons other than the person identified under paragraph (b) of this section, the names or positions of these people shall be documented, and the lines of authority defined through an organization chart or similar document.”

The organization chart provided failed to define the names or positions of persons assigned for implementing the individual requirements.

---

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

“(d) Information pertaining to the equipment in the process. (2) The owner or operator shall document that equipment complies with recognized and generally accepted good engineering practices.”

- a. 104-D had a repair performed in 2019 that required penetrant testing to be performed. Records showing this repair was within specification was not maintained. Progressive records need to be maintained for the life of the vessel pursuant to API 510.
  - b. Mosaic facility personnel stated that Ammonia piping was on RBI for frequency of inspections. The RBI assessment is within PCMS; however, there is no record showing that an API 580 certified inspector performed the RBI assessment.
  - c. RBI assessment data was not documented for Ammonia piping. Previous inspection records for circuits could not be provided to inspectors during the audit and these records are what Mosaic personnel claimed to have used in July 2020 for the RBI assessment on Ammonia piping.
- 

### **AOC 3 – 40 C.F.R §68.67 (e) Process Hazard Analysis**

“(e) The owner or operator shall establish a system to promptly address the team's findings and recommendations; assure that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete actions as soon as possible; develop a written schedule of when these actions are to be completed; communicate the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions.”

The 2016 Ammonia Plant PHA has 12 open findings, with several dated to be due by 12/31/2025. There are an additional 14 open PHA findings from the 2018, 2019, and 2020 PHAs. The 2016 Ammonia Plant PHA did not track 62 of 169 action items. Of the 107 that were tracked, 83 were not completed over 2.5 years after the PHA meetings were completed. Several open findings had a residual risk ranking of red marked in the PHAs.

---

#### **AOC 4 – 40 C.F.R §68.69 (c) Operating Procedures**

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

No Dry Products/ Granulation annual certifications were documented between 2014-2018.

---

#### **AOC 5 – 40 C.F.R §68.71 (a) 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.”

There was no initial training for a board operator in the Ammonia plant.

---

#### **AOC 6 – 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.”

Consultation with the employees on the appropriate frequency of refresher training was not documented.

---

#### **AOC 7 – 40 C.F.R §68.71 (c) Training**

“(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.”

For some of the operator training records, exams were not fully completed and had blank fields. It was difficult to determine if the operator received and understood the training required. For employees working prior to 2016, a training certification statement was provided inside each file that stated "Effective 1/1/2016, the initial testing for each job qualification in the Ammonia Plant will be changed due to the lack of integrity of the previous testing format and procedure. The new testing format procedure will not consist of multiple-choice testing format but will now be a fill in the blank testing format. The test questions will be pulled from a bank of questions, where the number of questions asked on any qualifying tests, depends on the particular job classification. For example: Front End, Back End, Compressor Deck and Board Certifications. This new testing format and procedure is a more thorough testing procedure, which will show the knowledge and skill level of the qualifying employee." This was not consistent with the training records reviewed. For example, there were still multiple-choice tests given

---

#### **AOC 8 – 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."

Mosaic did not establish and implement written procedures to maintain the on-going integrity of the following covered process equipment:

- a. Rotating equipment: There were vibration, thermography, and oil analysis programs being implemented at the site for certain rotating equipment; however, there was no procedure established that assigned these programs to specific equipment e.g., pumps, compressors, motors, etc.) The procedure that Mosaic did have for rotating equipment (REEE002 *Reliability Indicators for Rotating Machinery*) only appeared to cover repair and procurement steps for repairs and not preventative maintenance activities.
  - b. Rupture disks: Mosaic procedure (MNT102-MOS *Installation, Inspection, Testing, and Repair of Pressure Relief Devices*) did not cover maintenance of rupture disks. The other procedure, (*Rupture Disk Devices EP 5-3-15*) only governed the design of rupture disks and not maintenance for on-going integrity.
  - c. Emergency shutdown devices (ESD): A procedure had not been established or implemented ESDs. Function testing was being performed as part of SIS proof testing; however, this testing was not outlined in any procedure.
  - d. Safety instrumented systems (SIS): Proof/function testing and calibration was being performed for selected SISs; however, there was no procedure established that assigned this testing to interlocks and related components (e.g., transmitters, gauges, controls). A procedure had not been established or implemented for the maintenance of safety instrumented systems.
- 

#### **AOC 9 – 40 C.F.R §68.73 (c) Mechanical Integrity**

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

There was no training of maintenance technicians in specific operating procedures - I&E technicians – MM; CH; MS.

---

#### **AOC 10 – 40 C.F.R §68.73 (d)(1) Mechanical Integrity**

“(d) *Inspection and testing.* (1) Inspections and tests shall be performed on process equipment.”

a. T-1 did not have any internal inspections performed prior to 2019. This tank is subject to API 653 *Tank Inspection, Repair, Alteration, and Reconstruction* per Mosaic's procedure (MNT417-MOS *Mechanical Integrity of Above Ground Storage Tanks*). API 653 Section 6.4.2 *Inspection Intervals* states, “the interval from initial service until the initial internal inspection shall not exceed 10 years. If a service assessment per Annex H or a risk-based inspection (RBI) assessment has been performed, and the tank has one of the following leak prevention, detection, or containment safeguards, the initial internal inspection interval shall not exceed the applicable maximum interval as shown in API 653.” T-1 has an under-bottom leak detection and containment system designed in accordance with API 650 as its safeguard; therefore, its maximum initial interval could have been extended to 20 years based on API 653, but there was no RBI assessment or service assessment performed by Mosaic. This lack of assessment would make the 20 year max initial interval not applicable; thus, the initial interval was required to not exceed 10 years. T-1 has been in operation since 1967.

b. 114-F MDEA Storage Tank did not have any internal inspections performed prior to 2020. This tank is also subject to API 653 *Tank Inspection, Repair, Alteration, and Reconstruction* and did not have a service assessment per Annex H or RBI assessment performed to extend the max initial internal inspection past 10 years. 114-F MDEA has been in operation since 1967.

c. H-1 product heater has never had an internal inspection performed since its installation in 1967. H1 is subject to API 510 *Pressure Vessel Inspection Code: In-service Inspection, Rating, Repair, and Alteration* requirements per Mosaic's procedure (MNT415-MOS *Mechanical Integrity of ASME Pressure Vessels*.) MNT415-MOS also requires that periodic internal inspections shall be performed to ensure integrity of a vessel and that the frequency for internal inspections shall meet the requirements of API 510. API 510 requires that internal inspections shall be performed at least every 10 years or one-half of the remaining corrosion rate life, whichever is less.

---

#### **AOC 11 – 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.”

An API 510 certified inspector was not used for the 2019 internal inspection of vessel 104-D High Temperature Shift Converter. API 510 *Pressure Vessel Inspection Code: In-service Inspection, Rating, Repair, and Alteration* requires that the internal inspection shall be performed by an inspector. Other properly qualified personnel (e.g., NDE examiner) may assist the inspector (but not replace) in the internal inspection, when approved and under the direction of the authorized inspector. CW performed the 2019 internal inspection of 104-D, but CW was only a Level II Technician and was not API 510

certified at that time, which does not follow recognized and generally accepted good engineering practices.

---

**AOC 12 – 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.”*

- a. Seventy-four (74) piping circuits were overdue for external visual and thickness inspections at the time of EPA's audit;
- b. Nineteen (19) pieces of equipment were overdue for external visual inspections at the time of EPA's audit;
- c. Twenty-seven (27) pieces of equipment were overdue for internal inspections at the time of EPA's audit;
- d. Quarterly thermography inspection for pump P2 has not been done since July 2021;
- e. Monthly vibration was not performed for pumps P1 and P2 in January, April, August, October, and November 2021;
- f. Monthly vibration was not performed in May 2021 for pumps P109J and P109JA;
- g. 105-D had an external inspection performed March 2011, and per API 510 requirements, the next inspection was due on or before March 2016. This was not met. Mosaic personnel were able to find a 2018 date for an external inspection on this vessel; however, the report could not be located. If the external inspection was not performed until 2018, that makes the external inspection around two (2) years late;
- h. Vessel H1 has thickness readings set to a max inspection interval of sixty (60) months or half the remaining life, whichever is less, in PCMS (plant condition management software) as part of the RBI plan. For H1, thickness readings were taken March 2011, so the next thickness inspection was due on or before March 2016, but this was not met. The next thickness inspection for H1 was not performed until June 2020, which made it four (4) years late;
- i. Vessel H2 has thickness readings set to a max inspection interval of sixty (60) months or half the remaining life, whichever is less, in PCMS as part of the RBI plan. For H2, thickness readings were taken October 2013, so the next thickness inspection was due on or before October 2018, but this was not met. The next thickness inspection for H2 was not performed until June 2020, which made it one (1) year and eight (8) months late;
- j. H2 had an internal inspection performed in March 2000. The internal inspection interval for pressure vessels is ten (10) years or half the remaining life, whichever is less. The next internal inspection was due on or before March 2010, but this was not met. At the time of EPA's audit, an internal inspection had not been performed on H2 since March 2000, which makes it twelve (12) years overdue;
- k. Vessel H1 had an external visual inspection performed in March 2011. The next external inspection was due on or before March 2016 in accordance with API 510 requirements, but this was not met. The next external inspection was not performed until June 2020, which made it four (4) years late;
- l. Vessel H2 had an external visual inspection performed in March 2011. The next external inspection was due on or before March 2016 in accordance with API 510 requirements, but this was not met. The next external inspection was not performed until June 2020, which made it four (4) years late;

- m. Condition monitoring locations (CMLs) on vessel 104-D have sporadic measurements. Some CMLs have not had readings since 2005, and others since 2011. PCMS has max inspection intervals of thickness readings set to sixty (60) months or half the remaining life, whichever is less, in PCMS. The readings for those CMLs have exceeded that interval; therefore, they have not met the frequency of inspection and testing;
- n. Vessel 121-C Ammonia converter feed effluent exchanger had a thickness baseline readings taken in 2011. PCMS has max inspection intervals of thickness readings set to sixty (60) months or half the remaining life, whichever is less, in PCMS. The next thickness readings were due in 2016, but this was not met. The next thickness inspection was not performed until 2022, which made it six (6) years late;
- o. Vessel 121-C had an internal inspection performed in December 2006. Per code requirements, the next internal inspection was due on or before December 2016, but this was not met. At the time of EPA's audit, an internal inspection had not been performed on 121-C since December 2006, which made it six (6) years overdue; and,
- p. SIS testing for NH3 I-01; I-02A and B; I-04; I-05; I-10; I-11; and I-16 were two months overdue at the time of EPA's audit. The Mosaic MAXIMO system sets function testing to every two (2) years. The last round of testing had been performed between 12/27/2019 and 1/4/2020. The next round of testing was due between December 2021 and January 2022, but it had not yet been performed at the time of EPA's audit between 2/22/2022 and 2/25/2022. For previous records, SIS testing was also performed late from 2017 to 2019 and 2020 testing. See Table 1 below.

**Table 1. SIS Proof/function Testing for the Selected Ammonia Interlocks**

| SIS             | 2017 Testing                                       | 2019/2020 Testing | 2021 testing                                |
|-----------------|----------------------------------------------------|-------------------|---------------------------------------------|
| NH3 I-01        | No record                                          | 12/28/2019        | No testing has been done for the next cycle |
| NH3 I-02A and B | 1/22/2017 through 5/22/2017 for A; 5/29/2017 for B | 12/27/2019        | No testing has been done for the next cycle |
| NH3 I-04        | 5/15/2017                                          | 1/4/2020          | No testing has been done for the next cycle |
| NH3 I-05        | 5/5/2017                                           | 1/4/2020          | No testing has been done for the next cycle |
| NH3 I-10        | 5/5/2017                                           | 12/28/2019        | No testing has been done for the next cycle |
| NH3 I-11        | 4/26/2017                                          | 12/28/2019        | No testing has been done for the next cycle |
| NH3 I-16        | *Installed after 2017. New interlock.              | 12/31/2019        | No testing has been done for the next cycle |

#### AOC 13 – 40 C.F.R §68.73 (d)(4) Mechanical Integrity

“(d) *Inspection and testing.* (4) The owner or operator shall document each inspection and test that has been performed on process equipment. The documentation shall identify the date of the inspection or test, the name of the person who performed the inspection or test, the serial number or other identifier

of the equipment on which the inspection or test was performed, a description of the inspection or test performed, and the results of the inspection or test.”

- a. The previous inspections, including both external visual and thickness measurements, for ammonia piping was not found or provided to inspectors on-site. Inspection history could not be matched with the new circuits created by Mosaic.
  - b. 105-D appeared to have an external inspection performed in 2018 in PCMS by Mosaic inspectors; however, the inspection report could not be found.
  - c. The repair and test reports from 2017 for relief valves 400A, 400B, and 401 on T-1 did not have the date of the inspection or test, the name of the person who performed the inspection or test, and the results of the inspection or test.
- 

#### **AOC 14 - 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.”

2021 PHA open action item. An engineering firm has deemed that relieve valve RV-100-146 is not sized properly. (AON RC# RC136092; Assigned to JB; Due: 1/ 31/ 2021)

---

#### **AOC 15 – 40 C.F.R §68.75 (a) Management of Change**

“(a) The owner or operator shall establish and implement written procedures to manage changes (except for “replacements in kind”) to process chemicals, technology, equipment, and procedures; and changes to stationary sources that affect a covered process.”

Failure to implement MOC procedure for MOC: U262515034 - Install clamp on flange RV-0100-001A. This MOC is listed as a “Permanent MOC”. The MOC Procedure defines a Temporary Change as an approved change that is made with the intent to revert back to original or designed conditions. A temporary change: Only remains in effect for a predetermined period of time; Coverts to a permanent change if the decision is made not to return to original conditions. Temporary changes are subject to review after a maximum of 6 months. MOC: MPH3213- Install gate valve with blind on ¾” line off of NH3 Deaerator (condensate/ steam)- Permanent MOC has blank fields and is incomplete. (February 23, 2021).

---

#### **AOC 16 – 40 C.F.R §68.75 (c) Management of Change / 40 C.F.R §68.77 (b)(4) Pre-startup Safety Review**

“(c) Employees involved in operating a process and maintenance and contract employees whose job tasks will be affected by a change in the process shall be informed of, and **trained** in, the change prior to start-up of the process or affected part of the process.”

“(b) The pre-startup safety review shall confirm that prior to the introduction of regulated substances to a process:

- (1) Construction and equipment is in accordance with design specifications;

- (2) Safety, operating, maintenance, and emergency procedures are in place and are adequate;
- (3) For new stationary sources, a process hazard analysis has been performed and recommendations have been resolved or implemented before startup; and modified stationary sources meet the requirements contained in management of change, §68.75.
- (4) Training of each employee involved in operating a process has been completed.”

For MOC 262101420 and associated PSSR, the startup occurred before training, process safety information and operation procedures were updated. (Start-up: 9/19/2017, Training: 9/21/2017, SOP revised: 10/4/2017)

---

#### **AOC 17 – 40 C.F.R §68.75 (d) Management of Change**

“(d) If a change covered by this paragraph results in a change in the process safety information required by §68.65 of this part, such information shall be updated accordingly.”

For MOC 262101420 and associated PSSR, the startup occurred before training, process safety information and operation procedures were updated. (Start-up: 9/19/2017, Training: 9/21/2017, SOP revised: 10/4/2017)

---

#### **AOC 18 – 40 C.F.R §68.75 (e) Management of Change**

“(e) If a change covered by this paragraph results in a change in the operating procedures or practices required by § 68.69, such procedures or practices shall be updated accordingly.”

For MOC 262101420 and associated PSSR, the startup occurred before training, process safety information and operation procedures were updated. (Start-up: 9/19/2017, Training: 9/21/2017, SOP revised: 10/4/2017)

---

#### **AOC 19 - 40 C.F.R §68.79 (b) Compliance Audit**

“(b) The compliance audit shall be conducted by at least one person knowledgeable in the process.”

The audit team listed on the final report for the 2019 Compliance Audit lists James Thompson and James Klein, both from ABS Consulting and does not list a facility employee. ABS Consulting noted this a finding in the 2021 Compliance Audit.

---

#### **AOC 20 - 40 C.F.R §68.79 (d) Compliance Audit**

“(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.”

For the 2019 compliance audit, 6 of 20 findings are still open, several findings were closed late, and some could be argued that they should have been closed on time. In addition, there are a few repeat

findings from the 2016 compliance audit. The 2016 audit had 6 findings that were not completed promptly and beyond their due dates.

---

#### **AOC 21 - 40 C.F.R §68.81 (a) Incident Investigation**

“(a) The owner or operator shall investigate each incident which resulted in, or could reasonably have resulted in a catastrophic release.”

RC171212 involved a small fire at 103-C and was not investigated. The event summary was a small fire on the west head of the 103-C waste head boiler. The fire was extinguished with a steam ring. According to the facility, this has occurred more than once.

RC157972 involved a natural gas leak was not investigated. The event involved a natural gas leak on the inlet piping to PIC-4.

---

I, EPA Region 6 inspector Justin McDowell, conducted a closing conference for the inspection at Mosaic Faustina at 4:00PM on Friday, February 25, 2022. During the closing conference, EPA and LDEQ inspectors reviewed the Areas of Concern noted during the inspection with the Facility.

#### **Section IV – FOLLOW UP**

The following information was received by EPA on March 9, 2022, after exiting the Facility on February 25, 2022: preventative maintenance for the last 2 years on ammonia detectors (prints from MAXIMO, which is Mosaic Faustina’s system for managing work orders); Ammonia detector PM example (Applicable for all completed PMs); Ammonia Heater (H-2) Internal Inspection; 2017 Ammonia Storage Tank RV Inspection including RV-113-001A (RV-401), RV-113-001B (RV-400B) and RV-113-001C (RV-400A).

#### **Section V – LIST OF APPENDICES**

N/A