



Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	05/03/2022	
Media Program:	Air	
Regulatory Program(s)	Clean Air Act (CAA) Section 112(r) and 40 C.F.R. Part 68 Chemical Accident Prevention Provisions – Risk Management Program (RMP)	
Company Name:	Airgas, Inc.	
Facility Name:	Airgas USA, LLC	
Facility Physical Location:	12275 Robin Blvd.	
(city, state, zip code)	Houston, Texas 77045	
Mailing address:	259 N. Radnor-Chester Road	
(city, state, zip code)	Radnor, PA 19087	
County/Parish:	Harris County	
Facility Phone Number	713-433-3998	
Facility Contact:	Trae Gressett	Area Plant Manager
	Trae.gressett@airgas.com	
FRS Number:	110070374759	
Identification/Permit Number:		
Media Identifier Number:	RMP 1000 0015 4156	
NAICS:	42469	
SIC:		
Personnel participating in inspection:		
Dan Farris	Airgas USA	Airgas VP HSE
Ace Ririe	Airgas USA	Director of Engineering
Trae Gressett	Airgas USA	Area Plant Manager
Sherronda Phelps	US EPA	CAA Inspector
EPA Lead Inspector Signature/Date	<i>Sherronda Phelps</i>	6/30/2022
	Sherronda Phelps	Date
Supervisor Signature/Date		07/05/2022
	Samuel Tates	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

United States Environmental Protection Agency (EPA) Region 6 inspector, Sherronda Phelps, arrived at the Airgas USA (Airgas Houston) facility at 9:00 AM on May 3, 2022, for an announced inspection. I met with Trae Gressett, Area Plant Manager, and other facility personnel at the opening conference. I presented my credentials to all present and informed them 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 assessment of the facility's compliance with the Clean Air Act (CAA) Section 112(r), the General Duty Clause CAA 112(r)(1), and the Chemical Accident Prevention Provisions in 40 C.F.R. Part 68, CAA 112 (r)(7). Pursuant to section 112(r)(6)(L) of the CAA, an employee representative was invited to participate in the inspection; however, this site is a non-union facility.

FACILITY DESCRIPTION

According to the facility's executive summary, the Airgas Specialty Gases facility handles gases that are repackaged from storage vessels into tube trailers and cylinders. Airgas Houston handles ethylene, ethane, and methane at this location. These flammables being handled meet the threshold quantity as determined under 40 CFR § 68.115. The facility employs approximately 6 full-time employees (FTE's).

Section II - OBSERVATIONS

The initial documentation review began in person with Trae Gressett, Area Plant Manager, Dan Farris, Airgas VP HSE and Ace Ririe, Director of Engineering.

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

Subpart A – General

40 C.F.R. § 68.10 Applicability – Airgas Houston is a stationary source that has more than a threshold quantity of regulated substances in their process. The last submittal was made October 29, 2019, due to the five-year resubmission date. Airgas Houston is a RMP Program 3 facility. The facility is subject to the Occupational Safety and Health Administration's (OSHA) Process Safety Management (PSM) Standard (29 CFR § 1910.119).

40 C.F.R. § 68.12 General requirements - Airgas Houston submitted their most recent RMP submission on October 29, 2019. The regulated substances Ethylene, Ethane and Methane (flammables) are the regulated substance listed over the threshold quantity for the RMP Program Level 3 processes.

40 C.F.R. § 68.15 Management - Airgas Houston developed a management system to oversee the implementation of the risk management program elements. Airgas Houston provided an organizational chart that outlined the positions to implement the individual elements of the RMP, as required by this subpart.

Subpart B – Hazard Assessment

40 C.F.R. § 68.20 Applicability - Airgas Houston operates a RMP program level 3 process which is subject to this subpart and thus is required to prepare a worst-case release scenario analysis and complete the five-year accident history. I reviewed the documentation provided to make this analysis and identified no areas of concern with this subpart.

40 C.F.R. § 68.36 Review and update – Airgas Houston understands documentation associated with the worst-case scenarios that should be updated and reviewed at least every five years and are anticipating a review in 2024.

40 C.F.R. § 68.39 Documentation – Airgas Houston operates a RMP program level 3 process which is subject to this subpart and thus is required to prepare a worst-case release scenario analysis and complete the five-year accident history. I reviewed the documentation provided to make this analysis and identified no areas of concern with information pertaining to this subpart to include the Offsite Consequence Analysis (OCA) data. The facility used the EPA Model RMP*Comp™.

40 C.F.R. § 68.42 Five-year accident history - Airgas Houston did not report any accidental release(s) in their RMP that resulted in deaths, injuries, or property damage.

Subpart D – Program 3 Prevention Program

40 C.F.R. § 68.65 Process safety information - I reviewed various sections of the process safety information for the RMP covered processes at Airgas Houston.

40 C.F.R. § 68.67 Process Hazard Analysis (PHA) - I reviewed the last PHA completed August 6-10, 2018, where the final report was generated December 3, 2018. The PHA study was conducted using What-if, Checklist, and the Hazard and Operability Analysis (HAZOP) method via the Airgas Internal Risk group.

40 C.F.R. § 68.69 Operating procedures - I reviewed several operating procedures for the process. I reviewed and discussed with Airgas Houston personnel operating procedures, which included the Standard Operating Procedure (SOP) certification procedure, confined space entry, and lockout/tag out procedures. Airgas Houston certified that the operating procedures were current, accurate, and that the procedures were reviewed as often as necessary, as required by this subpart, and used a single certification document for operating procedures annually.

40 C.F.R. § 68.71 Training - I requested and was provided the training files for several employees at different experience levels. I reviewed a five year transcript history of several employees to check for refresher training and the initial trainings required. Airgas is implementing the necessary training program as required. Training is a combination of in-class, computer based as well as on the job training. Airgas makes use of Training Tracker to monitor the completion dates of all training.

40 C.F.R. § 68.73 Mechanical integrity - I reviewed mechanical integrity records for randomly selected inspections of RMP covered process equipment and the written procedure for maintaining the integrity of the process. There were no past due or overdue inspection items noted.

40 C.F.R. § 68.75 Management of change (MOC) - I discussed Airgas Houston's written procedure for MOC and the documentation with site personnel. The MOCs were implemented using an electronic

system. I reviewed several MOCs to evaluate the implementation of the procedures in place.

40 C.F.R. § 68.77 Pre-startup safety review - Airgas Houston provided documentation regarding pre-startup safety review. I reviewed several PSSR's while on site to follow the implementation of this element. No areas of concern were noted here.

40 C.F.R. § 68.79 Compliance audits – Airgas Houston conducted a PSM/RMP compliance audit of the facility in December 2019. Action Items from the audit were placed in the electronic tracking system titled, Intelix. I followed up on several items from the most recent audit to observe follow through and implementation of each action item created. Airgas brought each action item to a close in a timely manner as required by the regulation.

40 C.F.R. § 68.81 Incident investigation - I reviewed a list of incident reports/investigations for all incidents, which resulted in, or could have reasonably resulted in, a catastrophic release of a regulated substance for the last five years. Airgas Houston did not have any incident reports/investigations that met these criteria.

40 C.F.R. § 68.83 Employee participation - Airgas Houston implemented the requirements of this subpart.

40 C.F.R. § 68.85 Hot work permit - Airgas Houston discussed the process for conducting hot work onsite. The facility has had no recent hot work to occur onsite within the last two years.

40 C.F.R. § 68.87 Contractors - Airgas Houston makes use of a tiered system when selecting contractors to bring onsite. Airgas Houston makes certain that all contractors that may work onsite have been trained on the potential hazards related to both the process equipment and the work that the contractor may perform. Contractors must sign in and sign out daily to track their presence while onsite.

Subpart E – Emergency Response

40 C.F.R. § 68.90 Applicability – Airgas Houston employees are first responders.

40 C.F.R. § 68.95 Emergency response program – I reviewed Airgas Houston's Emergency Action Plan, and the plan addresses all the needed information.

Subpart G – Risk Management Plan

40 C.F.R. § 68.190 Updates – There have been no recent additions or upgrades to the unit that would have triggered an update to the Risk Management Plan.

40 C.F.R. § 68.195 Required corrections -The next RMP re-submission is due by October 29, 2024, unless an update or correction is required by 40 C.F.R. § 68.190 and § 68.195.

Section III – AREAS OF CONCERN

There were no areas of concern noted from this inspection.

Closing Meeting- EPA Region 6 inspector, Sherronda Phelps, conducted a closing conference at AirGas Houston on May3, 2022, for the inspection. During the closing conference, Sherronda Phelps, reviewed the elements covered during the inspection and any suggested recommendations made during the inspection. However, there were no AOC's to be noted from this inspection.

Section IV – FOLLOW UP

The following information was received by EPA on May 3, 2022, after exiting the Facility on May 3, 2022:
Houston Emergency Action Plan – January 2022

Section V – LIST OF APPENDICES

There are no photos, videos, or other appendices to share.