

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	4/5/2022-4/7/2022	
Media Program:	Air	
Regulatory Program(s)	RMP	
Company Name:	Ecovyst Inc.	
Facility Name:	Eco Services Operations, LLC. Houston Plant	
Facility Physical Location:	8615 Manchester Street	
(city, state, zip code)	Houston, Texas, 77012	
Mailing address:	2002 Timberloch Place	
(city, state, zip code)	The Woodlands, Texas, 77381	
County/Parish:	Harris County	
Facility Phone Number	(844) 812-1812	
Facility Contact:	Owen Soppet	Plant Manager
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FRS Number:	110000460901	
Identification/Permit Number:	Air Operating Permit ID: O-3049	
Media Identifier Number:	RMP: 100000082983	
NAICS:	325188	
SIC:	2819	
Personnel participating in inspection:		
Kayla Buchanan	EPA Region 6	Inspector
Charese Simpson	EPA Region 6	Inspector
Owen Soppet	Eco Services Houston Plant	Plant Manager
George Zolas	Eco Services Houston Plant	Process Safety Engineer
Tom Johns	Eco Services Houston Plant	Process Safety Manager
Bill Reasoner	Eco Services Houston Plant	Logistics Manager
Lisa Joseph	Eco Services Houston Plant	Training Specialist
Marcus Gonzales	Eco Services Houston Plant	I/E Planner/Scheduler
John Willis	Eco Services Houston Plant	Fixed Equipment Specialist
Theodore Trevino	Eco Services Houston Plant	Maintenance Manager
Rock Demarnis	Eco Services Houston Plant	Environmental Specialist
Grant Cooley	Eco Services Houston Plant	Health and Safety Manager
Larry Barnett	Eco Services Houston Plant	Regional Health and Safety Manager
Tayo Ogundiya	Eco Services Houston Plant	Operations Manager
EPA Lead Inspector Signature/Date	<i>Kayla Buchanan</i> Kayla Buchanan	05/26/2022 Date
Supervisor Signature/Date	Samuel Tates	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

I, Environmental Protection Agency (EPA) Region 6 inspectors Kayla Buchanan and Charese Simpson arrived at the Eco Services Operations, LLC. Houston Plant (Eco Services Houston) at 9:00 AM on April 5, 2022, for an announced inspection. EPA convened an opening conference and met with several representatives from the facility (*see Appendix 1*). Kayla presented her credentials to the opening conference attendees and informed them that this was an EPA inspection to determine Eco Services Houston's compliance with Section 112r(1) and (7) (the General Duty Clause and Risk Management Program requirements).

FACILITY DESCRIPTION

Eco Services Houston is located at 8615 Manchester Street, Houston, Texas, 77012. Eco Services Houston employs approximately 104 full time employees. Its hourly workers are represented by United Steelworkers. The facility manufactures sulfuric acid and conducts hazardous waste incineration. The site handles multiple RMP regulated substances including include Oleum (Fuming Sulfuric acid), Sulfur Trioxide (liquefied), Carbon Disulfide, Vinyl Acetate, Toluene Di-isocyanate, Propionitrile, Acrylonitrile, Methyl Mercaptan, Ethyl Mercaptan, Acetaldehyde, Allyl Alcohol, Propylene Oxide, Hydrazine, Hydrogen Sulfide, Isopropylamine, 1-Butene, Propylene, Cis Butene-2, Trans Butene-2, Isobutylene, 1,3 Butadiene, Isopentane, Ethyl Chloride, Dimethylamine, Ethylamine, Methylamine, Trimethylamine, and Propane. Oleum (Fuming Sulfuric acid) is used as a chemical intermediate, as a drying agent and is a raw material for dyes and detergents. Sulfur trioxide is used as an intermediate in the production of high purity sulfuric acid for use in the electronics industry. Carbon Disulfide, Vinyl Acetate, Toluene Di-isocyanate, Propionitrile, Acrylonitrile, Methyl Mercaptan, Ethyl Mercaptan, Acetaldehyde, Allyl Alcohol, Propylene Oxide, Hydrazine, Hydrogen Sulfide, Isopropylamine, 1-Butene, Propylene, Cis Butene-2, Trans Butene-2, Isobutylene, 1,3 Butadiene, Isopentane, Ethyl Chloride, Dimethylamine, Ethylamine, Methylamine, Trimethylamine, and Propane could be received as waste streams for energy recovery and raw material value.

Section II - OBSERVATIONS

On April 7, 2022, EPA participated in a walking tour of Eco Services Houston. Eco Services Houston plant manager Owen Soppet accompanied us. EPA observed the covered processes, equipment, operations, control rooms, and emergency equipment. EPA interviewed operators and asked questions about their training, the Management of Change (MOC) and Process Hazard Analysis (PHA) processes, and the facility's regular operating and emergency procedures.

40 C.F.R. § 68.10 Applicability – Eco Services Houston is a Title V stationary source that has an air operating permit and more than the threshold quantities of toxic regulated substances in its process streams; therefore, the RMP regulations are applicable. Eco Services Houston re-submitted a RMP on November 29, 2021, which describes the processes containing regulated chemicals stored at more than threshold quantities. In addition, this facility is subject to the Occupational Safety and Health Administration's (OSHA) Process Safety Management (PSM) Standard (29 CFR § 1910.119), which categorizes Eco Services Houston as a Program 3 facility.

40 C.F.R. § 68.12 General requirements – The owner or operator of a stationary source subject to this regulation shall submit a single Risk Management Plan (RMP), as provided in 40 CFR §§ 68.150 to 68.185. The RMP shall include a registration that reflects all covered processes. I reviewed the re-submission of Eco Service Houston's RMP. It listed the toxic regulated chemicals and the associated Program 3 processes.

40 C.F.R. § 68.15 Management – Eco Services Houston developed a management system to oversee the implementation of the risk management program elements. It assigned a qualified person or position that has overall responsibility for the development, implementation, and integration of the risk management program elements. Responsibility for implementing individual requirements of this part was assigned to persons other than the person identified, so the names or positions of these people were documented, and the lines of authority were defined through an organization chart or similar document.

Subpart B – Hazard Assessment

40 C.F.R. § 68.20 Applicability – Eco Services Houston is a Program 3 stationary source subject to this subpart; therefore, it is required to prepare a worst-case release scenario analysis and complete the five-year accident history.

40 C.F.R. § 68.22 Off Site Consequence Analysis Parameters – Eco Services Houston employed the parameters specified by EPA in this rule by using the RMP*Comp™ software. I reviewed the offsite consequence analysis and supporting documentation to assure the data was accurate and correct.

40 C.F.R. § 68.25 Worse-case release scenario analysis – Eco Services Houston identified and analyzed worst-case scenarios for each toxic substance in its Program 3 processes using the RMP*Comp™ software, thus meeting the requirements of the regulation.

40 C.F.R. § 68.28 Alternative Release Scenario Analysis – Eco Services Houston identified and analyzed at least one alternative release scenario for each toxic substance in its Program 3 processes using the RMP*Comp™ software, thus meeting the requirements of the regulation.

40 C.F.R. § 68.30 Defining Off Site impacts - Population – Eco Services Houston used the most current (2010) Census Bureau population data and the distances to endpoints, as specified in the regulation, to calculate the population numbers reported in their RMP. Eco Services Houston used the Circular Area Profiles application to define the population surrounding the facility. In addition, Eco Services Houston provided a map documenting the nearest public receptor.

40 C.F.R. § 68.33 Defining Off Site impacts – Environment – Eco Services Houston used US Geological Survey maps data to determine the environmental receptors and the distances to endpoints.

40 C.F.R. § 68.36 Review and Update – Eco Services Houston's reviews and updates its offsite consequence analysis every 5 years.

40 C.F.R. § 68.39 Documentation – Eco Services Houston maintained records of the offsite consequence analyses in accordance with this subpart. These records included:

- a description of the vessel or pipeline and substance selected as worst case and alternate release scenarios, assumptions and parameters used, and the rationale for selection of specific substances
- documentation of estimated quantity released, release rate, and duration of release
- methodology used to determine distance to endpoint
- data used to estimate population and environmental receptors

40 C.F.R. § 68.42 Five-year accident history – The regulation requires Eco Services Houston to include in its five-year accident history in its RMP, all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage. Eco Services Houston stated it did not have any accidental releases in the past five years that met these criteria. EPA examined Eco Services Houston's OSHA Form 300 logs from 2017 to present to ensure that additional releases from the facility, which could possibly be included in the facility's five-year accident history, were not omitted.

40 C.F.R. § 68.65 Process Safety Information (PSI) – EPA reviewed Eco Services Houston's PSI. The written process safety information enables the owner or operator and the employees involved in operating the process to identify and understand the hazards posed by those processes involving regulated substance. Eco Services Houston's compilation of written process safety information included 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. Eco Services Houston documented that its equipment complies with recognized and generally accepted good engineering practices (RAGAGEP).

40 C.F.R. § 68.67 Process Hazard Analysis (PHA) – EPA reviewed Eco Services Houston's PHAs. Eco Services uses the Hazard and Operability Study (HAZOP) and Layer of Protection Analysis methodologies to determine and evaluate the hazards of the process being analyzed.

EPA specifically examined Eco Houston's most recent PHA reports for the Logistics, Unit 8, and Regen II processes. The PHAs reviewed addressed: (1) the hazards of the process; (2) the identification of any previous incident which had a likely potential for catastrophic consequences; (3) engineering and administrative controls applicable to the hazards, and their interrelationships; and (4) consequences of failure of engineering and administrative controls.

The PHAs were performed by a team with expertise in engineering and process operations. The team included at least one employee who had experience and knowledge that was specific to the process being evaluated, and one employee who was knowledgeable in the specific PHA methodology used.

Eco Services Houston is required to establish a system to promptly address the PHA team's findings and recommendations and assure that the recommendations are resolved in a timely manner and that the resolution is documented. At least one of twelve action items from the 2016 Logistics PHA is still open. Two actions items from the 2021 Logistics PHA were repeat actions from the 2016 Logistics PHA. **(Appendices 2, 6, 7) [AOC # 1 – 40 C.F.R. § 68.67(e)].**

40 C.F.R. § 68.69 Operating Procedures – EPA reviewed Eco Services Houston's operating procedures for the operation of the Logistics, Unit 8, and Regen processes. The operating procedures EPA reviewed addressed: the steps for each of the operating phases; the consequences of deviation and mechanisms to correct and/or avoid deviation; safety and health considerations; the properties of, and hazards presented by chemicals used in the process; the precautions necessary to prevent exposure; quality control for raw materials; and the safety systems and their functions.

Eco Services Houston is required to 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. The emergency shutdown procedure for the Regen Process (20.EOP.01) did not provide clear instructions for safely conducting activities involved in that process **(Appendix 3)**. This emergency shutdown procedure referenced several other procedures, and it was difficult to determine what steps an operator would take to shut down to the unit in the event of an emergency **[AOC #2 - 40 C.F.R. § 68.69(a)]** Eco Services Houston certified annually that its operating procedures are current and accurate.

EPA reviewed Eco Services Houston's safe work procedures, including lock out/tag out procedures and safe confined space entry procedures. The safe work procedures apply to both employees and contractors.

40 C.F.R. § 68.71 Training – Eco Services Houston is required to train each employee involved in operating a process in an overview of the process and in the operating procedures. Each employee presently involved in operating a process, and each employee before being involved in operating a newly assigned process must be trained. In addition to initial training, employees must undergo refresher training at least every three years.

EPA asked Eco Services Houston to explain its training process. Currently, each operator completes onboarding training during which they receive required safety and health training and are informed about the hazards of the process. Once onboarding is complete, the newly hired operator is assigned a job, and receives specific instruction about that job. The operator must pass a test at the end of training to certify competency. Each operator is able to progress from outside operator to inside operator but must train and certify on each job.

EPA randomly selected operators from the Logistics, Unit 8, and Regen II process areas and reviewed the training records for the selected operators **(Appendix 4)**. Four operators in the Logistics process area were at least 11 months overdue for refresher training, and one is missing documentation of initial training. There was no documentation of training for one operator in the Unit 8 process area between

2014 and 2018. There were several instances when operators received refresher training for only the inside job, although Eco Services stated that operators must recertify on both the inside and out job functions. **[AOC #3 - 40 C.F.R. § 68.71(a) and (b)].**

Eco Services acknowledged training gaps, and recently hired a training coordinator to ensure its training program is consistent and ensure refresher training is provided to its employees operating a process at least every three years.

40 C.F.R. § 68.73 Mechanical Integrity – EPA reviewed the written procedures Eco Services established and implemented to maintain the ongoing integrity of its process equipment. John Willis, Fixed Equipment Specialist for Eco Services Houston and Baytown, explained the facility’s mechanical integrity program. The procedures ensured that the mechanical integrity program was guided by recognized and generally accepted engineering practices.

Eco Services Houston uses the third-party contractor Tech Corr for its nondestructive testing of process equipment. Mr. Willis reviews the results of these tests. EPA confirmed both Mr. Willis and the Tech Core contractor S. Zabo were certified by the American Petroleum Institute and were able to perform and oversee the mechanical integrity tests. EPA reviewed mechanical integrity inspections and tests for various process equipment at the facility. Each test reviewed was conducted in a timely manner, and the documentation identified 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.

40 C.F.R. § 68.75 Management of Change (MOC) – Eco Services Houston is required to 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. MOC-3.3-HOU-20220331-1003 was designated complete, however, the change was still in progress (**Appendix 5**). When confirming the completion of action items from the 2016 Logistics PHA, EPA identified several instances when a change was made to the process, but a MOC was not generated (**Appendix 2**) **[AOC #4 - 40 C.F.R. § 68.75(a)]**

The written MOC procedure assured the facility managed changes to process chemicals, technology, equipment, procedures, and changes to stationary sources that effect a covered process. The procedure assured that the following considerations were addressed prior to any change: technical basis for change, impact of change on safety and health, modifications to operating procedures, necessary time period for the change, and authorization requirements for a proposed change

Eco Services Houston employees involved in operating a process and maintenance and contract employees whose job tasks will be affected by a change in the process must be informed of, and trained in, the change prior to start-up of the process or affected part of the process; however, Eco Services was unable to provide documentation that its employees affected by the process received training **[AOC #5 - 40 C.F.R. § 68.75(c)].**

When a change covered by this paragraph resulted in a change in the process safety information required by § 68.65 or in the operating procedures or practices required by § 68.69, Eco Services did not always update the PSI or operating procedures accordingly. EPA noted at least one instance where a process and instrumentation diagram (P&ID) was not updated after a change was made to the logistics process (**Appendix 2**) [AOC #6 - 40 C.F.R. § 68.75(c)].

40 C.F.R. § 68.77 Pre-startup review (PSSR) - EPA reviewed Eco Services Houston's written PSSR procedures, as well as various PSSRs completed by the facility within the past five years. The PSSRs reviewed confirmed that, prior to the introduction of a regulated substance into the process, the construction and equipment design were completed in accordance with design specifications, required safety, operating, and maintenance procedures, and with adequate emergency procedures in place.

40 C.F.R. § 68.79 Compliance audits – EPA reviewed Eco Services Houston's two most recent RMP compliance audits conducted in 2018 and 2021 (**Appendices 6,7**). The facility's audits were conducted by AE Solutions, but an Eco Services employee participated in the audits. Eco Services certified that the compliance audits 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. Eco Services Houston's compliance audits were conducted by at least one person knowledgeable in the processes and they developed a report of the audit findings.

Eco Services Houston is required to determine and document an appropriate response to each of the findings of the compliance audits and document that deficiencies were corrected; however, several findings from the 2018 compliance audit were repeated in the 2021 audit. Finding HOU-2018A-03 states that the site had open recommendations from the 2013 and 2016 PHA. Finding 2021A-6 states that PHA recommendations were not resolved in a timely manner due to open recommendations from the same 2013 and 2016 PHAs. The 2018 compliance audit identified gaps in Eco Services Houston's operator training program, and a similar gap was found during the compliance audit conducted in 2021. Finding HOU-2018B-02 mentions that some operator's refresher training occurred past the due date, and finding HOU-2021A-7 also states that operators were overdue for refresher training. During this inspection, EPA discovered the same training gaps, which indicates this Eco Services Houston has yet to address this persisting finding. At least one deficiency from the 2015 audit has yet to be addressed and is still open in Eco Services action item tracking system Enablon [AOC #7 - 40 C.F.R. § 68.79(d)].

40 C.F.R. § 68.81 Incident investigation – Eco Services Houston is required to investigate each incident, which resulted in or could reasonably have resulted in a catastrophic release of a regulated substance. According to the facility, no such incidents occurred within the past five years. EPA reviewed Eco Services Houston's incident investigation procedure to ensure that if such an incident occurred, the facility would initiate the investigation, prepare the report, and document, correct, and communicate the incident investigation findings according to the RMP regulations.

Although Eco Services Houston did not have any incidents that involved the release of a regulated substance, an incident did occur at the facility in 2018 that involved a release of spent sulfuric acid that sprayed four Eco Services Houston employees. Eco Services conducted an investigation to determine the

cause of this incident. It also conducted a hazard analysis and implemented changes to the Logistics process (specifically incorporating the automation of valves) to ensure such an incident would not reoccur.

40 C.F.R. § 68.83- Employee Participation – I reviewed Eco Services Houston’s written plan of action regarding the implementation of the employee participation. This plan outlines how Eco Services Houston consults with employees and their representatives on the conduct and development of process hazards analyses and on the development of the other elements of process safety management.

40 C.F.R. § 68.85 Hot work permit – I reviewed hot work permits issued by Eco Services Houston. Each permit that I reviewed documented that fire prevention and protection requirements were implemented prior to beginning hot work operations. The permits indicated the dates authorized for hot work and identified the object on which the hot work was performed.

40 C.F.R. § 68.87 Contractors – Eco Services Houston uses the online system Avetta to obtain and evaluate information regarding the contract owner or operator’s safety performance and programs. Prior to starting work onsite, contractors must attend the Houston Area Safety Council to receive site specific and general safety training during which the contractors are informed of known potential fire, explosion, or toxic release hazards related to the contractor’s work and the process.

Eco Services Houston periodically evaluates the performance of the contract owner or operator in fulfilling their obligations by conducting period critical procedure audits. During these audits, Eco Services Houston evaluates its contractor’s performance as they conduct critical procedures. They also audit critical procedures permits that are written by the contractors to ensure they contractors are compiling with the safe work procedures implemented on site.

Subpart E- Emergency Response

40 C.F.R. § 68.90 Applicability – Eco Services Houston is a responding stationary source and must comply with the requirements of §§ 68.93, 68.95, and 68.96

40 C.F.R. § 68.93 – Emergency response coordination activities – Eco Services Houston affirmed that they coordinate response needs with local emergency planning and response organizations to determine how the stationary source is addressed in the community emergency response plan and to ensure that local response organizations are aware of the regulated substances at the stationary source, their quantities, the risks presented by covered processes, and the resources and capabilities at the stationary source to respond to an accidental release of a regulated substance. Eco Services Houston attends the Channel Industries Mutual Aid (CIMA) Local Emergency Planning Committee (LEPC meetings).

40 C.F.R. § 68.95 Emergency response program – EPA reviewed Eco Services Houston’s emergency response plan. The plan included: procedures for informing the public and local emergency response agencies about accidental releases; documentation of proper first aid and emergency medical treatment necessary to treat accidental human exposures; and procedures and measures for emergency response

after an accidental release of a regulated substance. The plan did not include procedures for the use of emergency response equipment, and for its inspection, testing, and maintenance or training for employees in relevant emergency response procedures [AOC #8 -40 C.F.R. § 68.95(a)(2)(3)]. While EPA was onsite, Eco Services Houston developed procedures for the use of emergency response equipment, and for its inspection, testing and plans to implement it immediately. The facility also stated that its employees on its Emergency Response Team last received relevant training in 2019, but a training will be scheduled.

40 C.F.R. § 68.96 Emergency response exercises – As a part of coordination with local emergency response officials required by §68.93, Eco Services Houston will be required to conduct an emergency response tabletop exercise before December 21, 2026, and at a minimum of at least once every three years thereafter.

Subpart G- Risk Management Plan

40 C.F.R. § 68.190 Updates – Eco Services Houston resubmitted its RMP on November 29, 2021.

40 C.F.R. § 68.195 Required corrections – Eco Services Houston next RMP re-submission is due by November 29, 2026, unless an update or correction is required by 40 CFR § 68.190 and 40 CFR § 68.195.

Section III – AREAS OF CONCERN.

EPA Region 6 inspectors Kayla Buchanan and Charese Simpson conducted a closing conference at Eco Services Houston at 4:00 PM on April 7, 2022, for the inspection. During the closing conference, Kayla and Charese reviewed seven of the eight Areas of Concern noted below. AOC #6 was determined after the conclusion of the inspection and was not included in the closing conference.

AOC # 1: Process Hazard Analysis – 40 C.F.R. § 68.67(e) requires Eco Services Houston 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.

At least one of twelve action items from the 2016 Logistics PHA is still open.

AOC #2: Operating Procedures – 40 C.F.R. § 68.69(a) requires Eco Services Houston to 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.

Eco Services Houston's emergency shutdown procedure for the Regen Process (20.EOP.01) did not provide clear instructions for safely conducting activities involved in that process. This emergency

shutdown procedure referenced several other procedures, and it was difficult to determine what steps an operator would take to shut down to the unit in the event of an emergency.

AOC #3: Training – 40 C.F.R. § 68.71(a) and (b) requires Eco Services Houston to train each employee presently involved in operating a process, and each employee before being involved in operating a newly assigned process, in an overview of the process and in the operating procedures; Eco Services Houston must provide refresher training 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.

Four operators in the Logistics process area were at least 11 months overdue for refresher training, and one is missing documentation of initial training. There was no documentation of training for one operator in the Unit 8 process area between 2014 and 2018. There were several instances when operators received refresher training for only the inside job, although Eco Services stated that operators must recertify on both the inside and out job function.

AOC #4: Management of Change – 40 C.F.R. § 68.75(a) requires Eco Services Houston to 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

MOC-3.3-HOU-20220331-1003 was designated complete, however, the change was still in progress. EPA identified several instances when a change was made to the process, but a MOC was not generated.

AOC #5: Management of Change – 40 C.F.R. § 68.75(c) requires Eco Services Houston to inform and train employees involved in operating a process, and maintenance and contract employees whose job tasks will be affected by a change, on the change prior to start-up of the process or affected part of the process.

Eco Services was unable to provide documentation that its employees affected by the process received training for several MOCs.

AOC #6: Management of Change – 40 C.F.R. § 68.75(e) requires Eco Services Houston to update its process safety information if a change in the process requires such an update.

EPA noted at least one instance where a process and instrumentation diagram (P&ID) was not updated after a change was made to the Logistics process.

AOC #7: Compliance Audits – 40 C.F.R. § 68.79(d) requires Eco Services Houston to promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected.

Several findings from Eco Services Houston's 2018 compliance audit were repeated in the 2021 audit. Finding HOU-2018A-03 states that the site had open recommendations from the 2013 and 2016 PHA. Finding 2021A-6 states that PHA recommendations were not resolved in a timely manner due to open recommendations from the same 2013 and 2016 PHAs. The 2018 compliance audit identified gaps in Eco Services Houston's operator training program, and a similar gap was found during the compliance audit conducted in 2021. Finding HOU-2018B-02 mentions that some operator's refresher training occurred past the due date, and finding HOU-2021A-7 also states that operators were overdue for refresher training. During this inspection, EPA discovered the same training gaps, which indicates this Eco Services Houston has yet to address this persisting finding. At least one deficiency from the 2015 audit has yet to be addressed and is still open in Eco Services action item tracking system Enablon.

AOC #8: Emergency Response -40 C.F.R. § 68.95(a)(2) and (3) requires Eco Services Houston to develop and implement an emergency response program that includes procedures for the use of emergency response equipment and for its inspection, testing, and maintenance and training for all employees in relevant procedures.

Eco Services Houston's emergency response plan did not include procedures for the use of emergency response equipment, and for its inspection, testing, and maintenance or training for employees in relevant emergency response procedures. The facility also stated that its employees on its Emergency Response Team last received relevant training in 2019.

Section IV – FOLLOW UP

No additional information was received by EPA after exiting the Facility on April 8, 2022.

Section V – LIST OF APPENDICES

All Appendices other than Appendix 1 are classified as Confidential Business Information (CBI) or Sensitive Appendices and are not included in the online published inspection report. CBI Appendices include documents that are claimed CBI by the facility. Sensitive Appendices may include appendices that will not be posted but are not explicitly CBI. These could include Personally Identifiable Information (PII) or Homeland Security sensitive information.

Appendix 1 – Opening and closing conference sign-in sheets

Appendix 2 – ECO-PHA-25 – 2016 Logistics PHA Recommendations

Appendix 3 – ECO-OP-15 – Regen 2 Emergency Shutdown Procedure (Procedure No. HO-R2_EOP1)

Appendix 4 – ECO-TR-18 – Training Records for Selected Operators

Appendix 5 – ECO-MOC-09 - MOC-3.3-HOU-20220331-1003

Appendix 6 – ECO-CA-06 – Eco Services Houston 2018 PSM-RMP Compliance Audit Report

Appendix 7 – ECO-CA-07 – Eco Services Houston 2021 PSM-RMP Compliance Audit Report