

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	August 5-8, 2025	
Media Program:	Air	
Regulatory Program(s)	Clean Air Act (CAA) § 112(r) and 40 Code of Federal Regulations (C.F.R.) Part 68 Chemical Accident Risk Management Plan (RMP)	
Company Name:	ChemTreat Nederland, Texas	
Facility Name:	City of Victoria Surface Water Treatment Plant	
Facility Physical Location:	4200 Twin City Highway	
(city, state, zip code)	Nederland, Texas 77627	
Mailing address:	5650 Cox Road	
(city, state, zip code)	Glen Allen, Virginia 23060	
County/Parish:	Henrico	
Facility Phone Number	361-485-3416	
Facility Contact:	Antonio Moore	Plant Manager
	antonio.moore@chemtreat.com	
FRS Number:	1100005033688	
Identification/Permit Number:	Air Permit Number: 20342	
Media Identifier Number:	RMP 100000077506	
NAICS:	325998 All Other Miscellaneous Chemical Product and Preparation Manufacturing	
SIC:	N/A	
Personnel participating in inspection:		
Julia Torres	EPA Region 6 ECDSC	RMP Inspector
Tho Tran	TCEQ	TCEQ Inspector
Antonio Moore	ChemTreat	Plant Manager
Jace Wood	ChemTreat	EHS Manager
Kendra Ochoa	ChemTreat	EHS Operations Manager
Carlos Salazar	ChemTreat	VES Leader
Tom Carter	ChemTreat	Senior Maintenance Manager
Noel Parker	ChemTreat	Director of EHS and Sustainability
Jayne Deal	ChemTreat	Global Environmental Manager
Kevin Nance	ChemTreat	Director of Operations
EPA Lead Inspector		
Signature/Date	Julia Torres	Date
Supervisor		
Signature/Date	Kayla Buchanan	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

United States Environmental Protection Agency (“EPA”) Region 6, inspector Julia Torres, and Texas Commission on Environmental Quality (“TCEQ”) inspector Tho Tran (“the inspection team,” “we”) arrived at the ChemTreat, Inc. (“ChemTreat”) facility in Nederland, Texas at 8:30 AM on August 5, 2025, for an announced inspection. I, Julia Torres, met with and presented credentials to Antonio Moore (Plant Manager), Jace Wood (EHS Manager), Kendra Ochoa (EHS Operations Manager), Carlos Salazar (VES Leader), Tom Carter (Senior Maintenance Manager), Noel Parker (Director of EHS and Sustainability), Jayne Deal (Global Environmental Manager) and Kevin Nance (Director of Operations) at the opening conference. I, Julia Torres, informed them that this was an EPA inspection to evaluate compliance with the requirements of the Chemical Accident Prevention Provisions of Title 40 of the Code of Federal Regulations (“C.F.R.”) Part 68 under Clean Air Act (“CAA”) § 112(r). An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 C.F.R. § 68.115, shall comply with the requirements of the CFR Part 68. Employee representatives were invited to participate in the inspection. The facility does not have union representation.

FACILITY DESCRIPTION

ChemTreat is located at 4200 Twin City Highway Nederland, Texas. The facility currently has forty-one (41) full time employees working in two shifts, 6AM to 2PM and 1PM to 9PM, with an hour overlap for a shift meeting at the beginning of both shifts. ChemTreat is a blending facility that manufactures and distributes industrial water treatment chemicals to service cooling towers, boilers, and wastewater treatment. Their Nederland facility is one of their three north American facilities, the other two being in Iowa and Virginia. The facility receives the inbound material, and following a quality check of the material, the product being ordered is entered into the system for ChemTreat to manufacture the batch order. Following a quality check of the material, the material is packaged and shipped to the customer. ChemTreat reported one (1) Program Level 2 covered process subject to the requirements of EPA’s RMP regulations in its most recent RMP submission, dated June 4, 2024. ChemTreat stores more than the threshold quantity for the Risk Management Plan (“RMP”) regulated substance cyclohexylamine, also known in the facility as Raw Material 29 (“RM 29”). The facility stores the cyclohexylamine in Tank 12, located in Tank Farm C. This tank was replaced from a carbon steel tank to a stainless steel tank in April of 2025 and began flowing in May of 2025. On the start date of the inspection, the facility had approximately 27,000 pounds of cyclohexylamine onsite.

Section II - OBSERVATIONS

The documentation review began on Tuesday, August 5, 2025, with the ChemTreat personnel as listed on the sign in sheets, **see Appendix 1.**

On Thursday, August 7, 2025, inspectors were accompanied by Antonio Moore, Jace Wood, Kendra Ochoa, and Carlos Salazar to conduct a tour of the facility, specifically Tank Farm C. EPA observed the covered process, emergency equipment, and the control room.

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

Subpart A – General

40 C.F.R. § 68.10 Applicability – ChemTreat has more than a threshold quantity of the regulated toxic substance cyclohexylamine as listed in 40 C.F.R. § 68.130 and is subject to the provisions of the Chemical Accident Prevention Program requirements. ChemTreat has a CAA Title V Air Operating Permit, Number 20342 and a North American Industry Classification System (NAICS) code of 325998 - All Other Miscellaneous Chemical Product and Preparation Manufacturing. ChemTreat is not subject to the Occupational Safety and Health Administration (OSHA) process safety management standard, 29 C.F.R. § 1910.119, and is an EPA RMP Level 2 facility.

40 C.F.R. § 68.12 General requirements – ChemTreat submitted their most recent 5-year Risk Management Plan submission on June 4, 2024. The Risk Management Plan listed cyclohexylamine as their RMP Program 2 regulated substance present in processes with amounts greater than the threshold quantity, prescribed in the standard, and therefore classified as by rule.

40 C.F.R. § 68.15 Management – ChemTreat has a management system to oversee the implementation of the RMP Program elements. The inspection team reviewed the organizational chart ChemTreat provided. ChemTreat failed to define the lines of authority for implementing individual requirements of this part to persons other than the person defined with the overall responsibility. The organizational chart provided failed to specify which employee(s) were responsible for individual elements of the program [AOC 1 -§68.25].

Subpart B – Hazard Assessment

40 C.F.R. § 68.20 Applicability – The owner or operator of a stationary source subject to this part shall prepare a worst-case release scenario analysis as provided in § 68.25 of this part and complete the five-year accident history as provided in § 68.42. The inspection team reviewed the worst-case release scenario analysis and a five-year accident history in the RMP.

40 C.F.R. § 68.22 Off-Site Consequence Analysis (“OCA”) Parameters – ChemTreat used parameters required in this part to calculate toxic worst-case and alternative release scenarios in their Offsite Consequence Analysis, completed April 16, 2020. ChemTreat utilizes RMP*Comp™ as the technique for modeling the release scenarios. For the worst-case and alternative case scenarios involving the toxic chemicals, 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 (WCS) Analysis – The inspection team reviewed the WCS for a release of chlorine. ChemTreat analyzed and reported in the RMP their worst-case release scenario, estimated to create the greatest distance to endpoint utilizing RMP*Comp™, and resulting from an accidental release of a regulated toxic substance from a covered process under worst-case conditions. ChemTreat identified the greatest amount held in a single vessel for their determination of the worst-case release quantity.

40 C.F.R. § 68.28 Alternative Release Scenario Analysis – The inspection team reviewed the alternative release scenario for chlorine. ChemTreat analyzed and reported an alternative release scenario for chlorine in the RMP. ChemTreat utilizes RMP*Comp™ to calculate the distance to endpoint.

40 C.F.R. § 68.30 Defining Offsite Impacts-Population – ChemTreat stated they used the most current census bureau population data made available in the software used to calculate the population numbers reported in their RMP.

40 C.F.R. § 68.33 Defining Offsite Impacts -Environment –The inspection team reviewed the OCA document with associated maps. ChemTreat identified environmental receptors in the distance to the endpoint or in the vicinity of the facility, as appropriate, in the area maps used for the modeling.

40 C.F.R. § 68.36 Review and Update – ChemTreat most recent off-site consequence analyses were last reviewed in June 2024 during the last RMP re-submission. ChemTreat ensures that this documentation is reviewed and updated at least once every five years.

40 C.F.R. § 68.39 Documentation – ChemTreat operates one (1) RMP Program level 2 process subject to this subpart and is required to prepare a worst-case release scenario analysis and complete the five-year accident history. The inspection team reviewed the worst-case and alternative-case scenarios provided. For the worst-case and alternate release scenarios, the substance selected as worst-case, and the rationale for selection was included. RMP* Comp™ was used to verify the distance to endpoint for each scenario.

40 C.F.R. § 68.42 Five-year Accident History – The inspection team reviewed the five-year accident history for ChemTreat for 2020 – 2024. ChemTreat had no accidents to report in their five-year accident history. The facility listed one incident in their RMP submission on June 4, 2024, that did not meet the requirements for being considered an accident. ChemTreat removed the incident from their five-year accident history from their RMP submission prior to the inspection. The inspection team reviewed and verified the incident listed did not fall under the five-year accident history for ChemTreat.

Subpart C – Program 2 Prevention Program

40 C.F.R. § 68.48 Safety Information – ChemTreat maintains a variety of technical documents used to maintain safe operation of the processes. These documents address chemical properties and associated hazards, limits for key process parameters and specific chemical inventories, and equipment design basis/configuration information. Chemical-specific information, including exposure hazards and emergency response/exposure treatment considerations, is provided in safety data sheets (SDSs). In addition, the facility documented safety-related limits for specific process parameters (e.g., temperature, level, composition), as well as the equipment specifications codes and standards used to operate the process.

40 C.F.R. § 68.50 Hazard Review – We reviewed ChemTreat’s two most recent hazard reviews, conducted in 2024 and 2025. ChemTreat used both the HAZOP and checklist technique on the most recent PHA to perform these evaluations. A team of people who have operating, maintenance, and engineering expertise conducted the hazard review. When conducting the hazard review, the covered process is systematically examined to identify hazards and ensure that adequate controls are in place to manage those hazards. ChemTreat performed their scheduled Hazard Review in 2024 and conducted a Review in 2025 prior to the replacement of Tank 12. The 2024 Review identified the opportunities for human error or equipment failure that could lead to an accidental release, as did the 2025 Review. The 2025 review conducted prior to the installation of the new RM 29 tank incorrectly identified the tank on the form as Tank 24. The only action item in progress also incorrectly identifies the tank as Tank 24. In

addition, the 2024 and 2025 Reviews document that one item in 2024 and two items in 2025 are complete, but the status update fails to document or verify how the action item was completed. One action item from the 2024 hazard review as well as two action items from the 2025 review were completed past their due date. The 2024 Hazard Review reported one action item as closed two months before its due date of September 30, 2025, but did not reflect the resolution of the item, noting that a Teams message was sent on the date it was marked as closed, but does not indicate which of the two contacts listed it was sent to for verification. In the 2025 Hazard Review, one overdue action item involved a failure to verify that a valve was marked as open, and another lacked documentation of the date when a line was partially opened. [AOC 2 -§68.50(c)]. ChemTreat failed to update the hazard review every five years, as their previous review was in 2018 and was due in 2023, as noted in their 2024 Compliance Audit. [AOC 3 -§68.50(d)]. See Appendix 2.

40 C.F.R. § 68.52 Operating Procedures – ChemTreat maintains written procedures that address various modes of operations, such as unit startup, normal operations, temporary operations, emergency shutdown, normal shutdown, and initial startup of a new process. The standard operating procedures (SOPs) contain safe operating conditions and limits for each production area as required which is consistent to process safety information. These SOPs can be used as a reference by experienced operators and provide a basis for consistent training of new operators. When one of the three ChemTreat facilities develops a new SOP, it shares the SOP with the other two sites. The SOPs are available to operators while in the control room through an electronic copy on their KPA app to use as necessary to safely perform their job tasks. ChemTreat is working to develop the SOPs as hard copies for access. On June 12, 2023, an incident occurred involving the RM 29 pump releasing product on an operator who was checking the shut off valve. At the time of the incident, there was no formalized procedure in place that included the personal protective equipment during a line break. ChemTreat later included and formalized the addition of PPE in their cyclohexylamine operating procedure in February 2024. [AOC 4 -§68.52(a)]. See Appendix 3.

40 C.F.R. § 68.54 Training – ChemTreat provided the inspection team with their Training Policy. ChemTreat has implemented a training program for all employees involved in operating a process. All operations employees receive basic training for the facility operations. Operators must also demonstrate awareness of and competency through hands on and computer-based training (CBT). Currently the training is being moved from being tracked on Sharepoint to a new learning management system (LMS). Operators also complete their refresher training of being aware of the different operation procedures associated with the process annually. We requested the training records of six (6) selected operators associated with the RMP covered process for the past five years. Two (2) operators were missing refresher Environmental Aspects training for 2022, 2023, and 2025. One (1) operator was overdue for their 2024 refresher Environmental Aspects training, having taken it in 2025. The facility was also unable to provide refresher training records for the last five (5) years due to document control challenges from previous processes/systems and was only able to provide the operations and maintenance refresher training for 2024 and 2025, stated in their notification of having provided the supplemental documentation on August 13, 2025.[AOC 5 -§68.50(b)].

ChemTreat operators complete refresher training for Environmental Aspects every year, which includes training on the general requirements for the Risk Management Program. Operators go through the operating procedure and sign off demonstrating understanding, including the Cyclohexylamine Operating Procedure. The inspection team reviewed the sign off for the 2025 RMP and Emergency Response Training on July 4, 2025, two months after the startup of the new tank installation and startup [AOC 6 -§68.50(d)].

40 C.F.R. § 68.56 Maintenance – The inspection team reviewed the maintenance procedures and inspections ChemTreat keeps for maintaining the ongoing integrity of the process equipment. The basic aspects of this program include performing and documenting inspections and tests, correcting identified deficiencies, and applying quality assurance measures. ChemTreat conducts inspections on the Cyclohexylamine Bulk Tank as well as its critical pieces of equipment. Maintenance testing and inspections are tracked on the maintenance tracking system MaintainX, which ChemTreat began utilizing in May 2024. ChemTreat uploads past inspection records that were previously tracked via hard copy to MaintainX. The inspection team reviewed fifteen (15) maintenance procedures related to RM 29's bulk tank. The inspection and testing guidance in the procedures is developed with guidance from the applicable manufacturers' recommendations. The inspection team noted that the Maintenance procedures had different document numbers from their title in the Maintenance Checklist. The inspection team reviewed the monthly maintenance inspections for the process equipment. ChemTreat was unable to locate inspections that were transferred to MaintainX prior to November 2022. The inspection team also reviewed the maintenance employee training records for initial and refresher training from the past five (5) years. The training records for Maintenance Procedures MAINT-013, MAINT-014, AND MAINT 015 were missing the date of training, and ChemTreat was unable to provide the refresher training for maintenance procedures MAINT-001 to MAINT-012 **[AOC 7-§68.56(b)]**. ChemTreat also failed to provide the monthly inspections for January, February, March, and July of 2024, and failed to provide the monthly inspections for April and June of 2025 **[AOC 8-§68.56(d)]**. See **Appendix 5**.

40 C.F.R. § 68.58 Compliance Audits – The inspection team reviewed ChemTreat's most recent compliance audit, conducted on April 8, 2024. The compliance audit provided was conducted by a third-party auditor. The Compliance Audit had eight (8) findings and listed 8 action items to address the findings. The inspection team reviewed the findings, which are now tracked in the online system Gensuite. The Gensuite system showed that six (6) audit findings were closed out after their due dates. However, ChemTreat provided their tracking spreadsheet, which documented that these findings were actually completed before the due dates. ChemTreat was unable to provide their 2021 Compliance Audit for review **[AOC 9 -§ 68.58(e)]**.

40 C.F.R. § 68.60 Incident Investigation – The inspection team reviewed incidents that occurred in the last five (5) years. The EHS director begins the incident review within thirty (30) dates after the incident. Level 1 and 2 incidents are entered into Gensuite, while level 3 incidents are entered into KPA, a new management system ChemTreat is transitioning to, along with all reported near-misses. The report also includes a DIVE form, which is a more detailed investigation of the cause of the incident. The July 17, 2024, incident report for a leak at the top of Tank 12 listed the date of the incident, date the investigation began, the description of the incident, factors contributing to the incident, and recommendations resulting from the investigation. The incident reports for a release on June 12, 2023, involving the RM 29 pump listed the date of the incident, date the investigation began, the description of the incident, factors contributing to the incident, and recommendations resulting from the investigation. This incident indicated the operator was not wearing the appropriate PPE when operating the pump when RM 29 was released. Refer to **40 C.F.R. § 68.52 Operating Procedures** for further information.

Subpart E – Emergency Response

40 C.F.R. § 68.90 Applicability – ChemTreat is designated as a non-responding stationary source in case of an accidental release of a regulated substance; therefore, the facility shall comply with the requirements of 40 C.F.R. § 68.93 and 40 C.F.R. § 68.96.

40 C.F.R. § 68.93 Emergency Response Coordination– ChemTreat coordinated response needs with local emergency planning and response organizations in 2024. ChemTreat notified the LEPC of a coordination activity in 2024, which the LEPC attended. ChemTreat plans to hold a drill and walkthrough of the facility in September 2025. The inspection team requested documentation of coordination with the LEPC for the years 2021-2024, which the facility was unable to provide **[AOC 10 -§ 68.93(a)]**.

40 C.F.R. § 68.96 Emergency response exercises – As part of coordination with local emergency response officials required by §68.93, ChemTreat provided the inspection team with documentation of an emergency response exercise completed with officials to establish an appropriate frequency for field exercises in 2024. EPA also reviewed ChemTreat’s two unplanned fire drills in 2020 and 2021.

Subpart G – Risk Management Plan

40 C.F.R. § 68.150 Submission – ChemTreat submitted their 5-year update to their RMP on June 4, 2024. The re-submission was within the 5-year timeframe as required by 40 C.F.R. § 68.150.

40 C.F.R. § 68.160 Registration – ChemTreat included in their RMP all regulated substances present at the site above their designated threshold quantity as required by 40 C.F.R. § 68.160.

40 C.F.R. § 68.190 Updates – A ChemTreat’s RMP submittal was on June 4, 2024, and the previous submittal for this facility was on June 4, 2019.

SECTION III - AREAS OF CONCERN

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

ChemTreat failed to provide an organizational chart identifying the individuals responsible for implementing the requirements of their Risk Management Plan. The facility provided a screenshot of their Teams organizational chart that did not specify what each individual involved oversaw in their implementation.

AOC 2 – 40 C.F.R. § 68.50(c) Hazard Review. *The owner or operator shall document the results of the review and ensure that problems identified are resolved in a timely manner.*

ChemTreat failed to resolve one action item from the 2024 Hazard Review before its due date, and two action items on their 2025 Hazard Review were also completed past their due date. In addition, the 2024 and 2025 Reviews document that one item in 2024 and two items in 2025 are complete, but the status update fails to document or verify how the action item was completed. **See Appendix 2.**

AOC 3 – 40 C.F.R. § 68.50 (d) Hazard Review. *The review shall be updated at least once every five years. The owner or operator shall also conduct reviews whenever a major change in the process occurs; all issues identified in the review shall be resolved before startup of the changed process.*

ChemTreat failed to conduct their 2023 Hazard Review five years after the 2018 Hazard Review. The 2023 Hazard Review was conducted in 2024, one year past the expected updated Review.

AOC 4 – 40 C.F.R. § 68.52 (a) Operating Procedures. *The owner or operator shall prepare written operating procedures that provide clear instructions or steps for safely conducting activities associated with each covered process consistent with the safety information for that process. Operating procedures or instructions provided by equipment manufacturers or developed by persons or organizations knowledgeable about the process and equipment may be used as a basis for a stationary source's operating procedures.*

On June 12, 2023, an incident occurred where the operator checking the line break was splashed with RM 29. The report indicated that the associate was not wearing a face covering at the time of the exposure. ChemTreat failed to include clear instructions for safely operating the cyclohexylamine, which included the appropriate PPE involved in the line break procedure. ChemTreat later included the addition of PPE in their cyclohexylamine operating procedure in February 2024. **See Appendix 3.**

AOC 5 -40 C.F.R. § 68.54(b) Training. *Refresher training shall be provided at least every three years, and more often if necessary, to each employee operating a process to ensure that the employee understands and adheres to the current operating procedures of the process. The owner or operator, in consultation with the employees operating the process, shall determine the appropriate frequency of refresher training.*

ChemTreat failed to provide refresher training to each employee operating a process at least every three years, and more often if necessary. The inspection team reviewed the training records for six operators in the facility and found that two operators were missing from the annual refresher training sign in for 2022, 2023, and 2025. There was no documentation by ChemTreat to demonstrate that the refresher training was provided for them for 2022, 2023, and 2025. The facility was also unable to provide refresher training records for the last five (5) years due to document control challenges from previous processes/systems, and was only able to provide the refresher training for 2024 and 2025.

AOC 6 -40 C.F.R. § 68.54(d) Training. *The owner or operator shall ensure that operators are trained in any updated or new procedures prior to startup of a process after a major change.*

ChemTreat failed to ensure the operators were trained in the cyclohexylamine operating procedure prior to the installation of the new tank. ChemTreat provided the sign in sheet for their training on RM 29 and Environmental Aspects. This sheet was dated July 9, 2025, two months after the tank had begun flowing in May of 2025. **See Appendix 4.**

AOC 7 -40 C.F.R. § 68.56(b) Maintenance. *The owner or operator shall train or cause to be trained each employee involved in maintaining the ongoing mechanical integrity of the process. To ensure that the employee can perform the job tasks in a safe manner, each such employee shall be trained in the hazards of the process, in how to avoid or correct unsafe conditions, and in the procedures applicable to the employee's job tasks.*

ChemTreat failed to provide the refresher training for maintenance procedures MAINT-001 to MAINT-012. Maintenance procedures MAINT-001 to MAINT-012 were created in 2023; the facility could only produce refresher training documentation for 2024 and 2025.

AOC 8 -40 C.F.R. § 68.56(d) Maintenance. *The owner or operator shall perform or cause to be performed inspections and tests on process equipment. Inspection and testing procedures shall follow recognized and generally accepted good engineering practices. The frequency of inspections and tests of process equipment shall be consistent with applicable manufacturers' recommendations, industry standards or codes, good engineering practices, and prior operating experience.*

ChemTreat failed to provide documentation confirming the frequency of inspections and tests of process equipment was consistent with applicable manufacturers' recommendations, industry standards or codes, good engineering practices, and prior operating experience. The facility was unable to verify or locate the process equipment inspections prior to November 15, 2022. The facility failed to provide the monthly Maintenance Monthly Task Checklist inspection for the months of January, February, March, and July of 2024, and for the months of April and June of 2025. The facility also failed to provide the Cyclohexylamine Monthly RMP Maintenance Checklists for eleven (11) of the twelve (12) months of 2024, and the months of January, March, and July of 2025. **See Appendix 5.**

AOC 8 -40 C.F.R. § 68.58 (e) Compliance Audits. *The owner or operator shall certify that they have evaluated compliance with the provisions of this subpart, at least every three years to verify that the procedures and practices developed under this subpart are adequate and are being followed. When required as set forth in paragraph (f) of this section, the compliance audit shall be a third-party audit.*

ChemTreat failed to certify that they evaluated compliance with the provisions at least every three years. The facility provided their most recent compliance audit listed in 2024. However, the facility was unable to provide a compliance audit for 2021.

AOC 9 -40 C.F.R. § 68.93 (a) Emergency Response Coordination. *Coordination shall occur at least annually, and more frequently if necessary, to address changes: At the stationary source; in the stationary source's emergency response and/or emergency action plan; and/or in the community emergency response plan.*

ChemTreat failed to provide documentation of coordination with the local emergency planning and response organizations for 2021-2023. The facility plans to conduct their next walkthrough in September 2025, sixteen months after their May 2024 walkthrough with the fire department.

Section IV – FOLLOW UP

I requested supplemental documentation be downloaded to the EPA designated SharePoint site for review by August 14, 2025, which the facility provided on August 13, 2025.

Section V – LIST OF APPENDICES

The Appendices 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. Sign-in sheets for opening and closing meetings

Appendix 2. 2024 and 2025 PHA

Appendix 3. Incident Report for the June 12, 2023 Release of RM 29

Appendix 4. RM 29 Training sign sheet

Appendix 5. Monthly Maintenance Checklists