

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	August 26 - 28, 2025	
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:	Airgas Inc.	
Facility Name:	Airgas Specialty Products - LaPorte, TX	
Facility Physical Location:	11426D W Fairmont Pkwy	
(city, state, zip code)	La Porte, Texas 77571	
Mailing address:	2530 Sever Road, Suite 300	
(city, state, zip code)	Lawrenceville, Georgia	
County/Parish:	Harris County	
Facility Phone Number	(678) 407-7504	
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FRS Number:	110071820734	
Identification/Permit Number:	N/A	
Media Identifier Number:	100000255056	
NAICS:	42469 - Other Chemical and Allied Products Merchant Wholesalers	
SIC:	N/A	
Personnel participating in inspection:		
Charese Simpson	EPA Region 6	Lead Inspector
Mark Keller	Airgas	Regional Compliance Manager
Tonya Sumners	Airgas	VP Safety & Compliance
Michael (Mike) Lewis	Airgas	Regional Compliance Manager
Todd Wilson	Airgas	Facility Manager
EPA Lead Inspector	<i>Charese Simpson</i>	12/2/2025
Signature/Date	Charese Simpson	Date
Supervisor		
Signature/Date	Kayla Buchanan	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

The United States Environmental Protection Agency (EPA) Region 6 Inspector, Charese Simpson (“I”), arrived at the Airgas Specialty Products - LaPorte, TX (Airgas) facility at 9:00 AM on Tuesday, August 26, 2025, for an announced inspection. I met with Mike Lewis (Regional Compliance Manager) and Mark Keller (Regional Compliance Manager) for an opening meeting [Appendix 1]. I presented my credentials and informed Airgas 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)(1) & (7), the General Duty Clause and the Chemical Accident Prevention Provisions in 40 C.F.R. Part 68. Airgas’s Risk Management Plan (RMP) is listed as a Program Level Three (3) 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 Airgas is a non-union facility.

FACILITY DESCRIPTION

Airgas is located at 11426D W Fairmont Pkwy La Porte, Texas 77571 in Harris County. Airgas’s site stores and distributes anhydrous ammonia and aqueous ammonia which is at a concentration greater than 20%. Airgas’s regulated process includes one Program Level 3 RMP-Covered Process: Anhydrous and Aqueous Ammonia Production System. Airgas handles two regulated, toxic chemicals in its process under the Risk Management Program: Anhydrous Ammonia and Ammonia (conc 20% or greater). Airgas has approximately 10 full-time employees that work at the site.

Section II - OBSERVATIONS

On Wednesday, August 27, 2025, Mike Lewis, Mark Keller, and Todd Wilson accompanied me as I conducted a tour of the site, specifically of the Ammonia Distribution area. While on the tour, I observed the covered process, emergency equipment, other process equipment, and areas. Airgas’s employees can access standard operating procedures (SOPs) electronically. In addition, the facility obtains hard copies of SOPs to access in case of a power outage or emergency. Prior to the tour, I was provided with piping and instrumentation diagrams (P&IDs) and a block flow diagram of the process unit that assisted in the tour.

Subpart A – General

40 C.F.R. § 68.10 Applicability – Airgas 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 3 process under OSHA PSM.

40 C.F.R. § 68.12 General Requirements – I reviewed Airgas’s RMP registration submitted on August 30, 2024. It listed the toxic chemicals for its Program 3 process.

40 C.F.R. § 68.15 Management – Airgas developed a management system to oversee the implementation of risk management program elements, documented the positions for implementing the individual requirements of the risk management program, and defined the lines of authority using its RMP Management Organizational Chart, which lists responsibilities.

Subpart B – Hazard Assessment

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

40 C.F.R. § 68.22 Off-Site Consequence Analysis Parameters – Airgas used parameters required in this part to calculate toxic worst-case and alternative release scenarios. Airgas 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 Worse-Case Release Scenario Analysis – During the inspection, I reviewed documentation from Airgas regarding the worst-case release scenario analysis for their toxic process. This analysis used RMP*Comp™ which is a dispersion modeling suite that includes toxic dispersion, fire, and explosion models. Airgas analyzed and reported in the RMP their 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. Based upon the criteria for determining a worst-case event, anhydrous ammonia was selected as having the worst release potential. The quantity in the largest vessel was used, which was a storage tank with a capacity of 131,325 pounds of anhydrous ammonia.

40 C.F.R. § 68.28 Alternative Release Scenario Analysis – Airgas identified and documented the alternative release scenario to represent all toxic substances held in a covered process, using a scenario that is likely to occur. The ammonia is at most risk, or more likely to be released during transfer between storage vessels and delivery trucks. Therefore, a transfer hose failure is the most likely release scenario for anhydrous ammonia. Excess flow valves are intended to mitigate the flow upon hose failure. Airgas utilizes RMP*Comp™ and Marplot. They maintain aerial photos showing the alternative release scenario endpoint distance radius and a circle centered on the approximate location of the unit that is considered in the alternative release scenario; therefore, meeting the requirements of the regulation.

40 C.F.R. § 68.30 Defining Off-Site Impacts - Population – Airgas used the most current Census Bureau population data and the distances to endpoints, as specified in the regulation, to calculate the population numbers reported in their RMP.

40 C.F.R. § 68.33 Defining Off-Site Impacts - Environment – Airgas 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 – Airgas reviewed and updated the off-site consequence analyses at least once every five years, as required by this subpart.

40 C.F.R. § 68.39 Documentation – Airgas maintained records of the off-site consequence analyses, in accordance with this subpart. These records included:

- documentation of vessels or pipelines;
- substances selected for worse case and alternative release scenarios;
- documentation of estimated quantity released, release rate, and duration of release;
- methodology used to determine distance to endpoint; and,
- data used to estimate population and environmental receptors.

40 C.F.R. § 68.42 Five-year accident history – I reviewed Airgas five-year accident history and OSHA logs for 2022 – 2024. I did not identify accidental releases from the covered process that resulted in one or more of the following: on-site deaths, injuries, significant property damage on-site, known off-site deaths, 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 – Airgas compiled written process safety information, which 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. Safety Data Sheets (SDSs) for the process chemicals were provided and detailed process safety information was provided that contained the following data for the hazards of the substances 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 a 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 for each covered process. I reviewed documentation pertaining to the equipment of the process, including materials of construction, P&IDs, electrical classification, relief system design and design basis, design codes and standards employed, material and energy balances, and safety systems.

40 C.F.R. § 68.67 Process hazard analysis (PHA) – Airgas has a comprehensive program to help ensure that hazards associated with the various processes are identified and controlled. Within this program, each covered process is systematically examined to identify hazards and ensure that adequate controls are in place to manage these hazards. Airgas primarily uses the hazard and operability (HAZOP) and What-If techniques to perform these evaluations. The analyses are conducted using a team of people who have operating, maintenance, and engineering expertise. The PHA was 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.

I reviewed the facility's PHAs dated September 2024 and February 2021 for the Anhydrous and Aqueous Ammonia Production Systems. In addition, I reviewed Airgas's facility siting evaluation and checklist and their human factors checklist. Both PHAs addressed the hazards of the process and included: identification of any incident that had a likely potential for catastrophic consequences; engineering and administrative controls applicable to hazards and their interrelationships; human factors; and an evaluation of a range of the possible safety and health effects of failed controls.

Airgas currently utilizes Intalex to track and promptly address the PHA 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. During the inspection, I reviewed the facility's tracking system that contained actions items from their PHAs. I also followed up to ensure the actions were officially closed through the facility's management of change process. All action items are currently closed in the system.

40 C.F.R. § 68.69 Operating Procedures – Airgas developed and implemented written operating procedures that provide instructions or steps for conducting activities associated with each covered process, consistent with the safety information. The SOPs I reviewed addressed: the steps for each operating phase (initial and normal startup, normal operations, temporary operations, emergency operation and shutdown, normal shutdown, and startup following a turnaround or after emergency shutdown); 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. Operating procedures are accessible to process operators and other employees electronically through APSM which is a web-based process safety management compliance software that unifies action tracking. In addition, hard copies of SOPs are kept in the control room and are updated whenever a change is made. During the inspection, I reviewed Airgas's safe work procedures, including lock out/tag out procedures and confined space entry procedures. The company

utilizes safe work permits, which are required prior to any contractor entering a confined space. Airgas is required to annually certify that operating procedures are current and accurate. I reviewed a sample of Airgas's operating procedure certifications. The operating procedures and certifications were current and accurate.

40 C.F.R. § 68.71 Training – EPA reviewed Airgas' training program procedure and employee training records. The facility's training program ensured that each employee presently operating the covered process, and each employee newly assigned to a covered process are trained or tested to qualify as competent in an overview of the process and in the operating procedures that pertain to their duties. In addition, Airgas operator(s) must go through a training program, which includes the following: on-the-job training, a testing process that is written and computer-based, and a series of field demonstration tests. The Airgas University training system is Airgas's online system to house training documents and certifications. I reviewed several individuals' training documents. Airgas is required to provide refresher training 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. I requested documentation to ensure that operators understood the training. Airgas provided sufficient documentation for the means of verification that the operators understood the training.

40 C.F.R. § 68.73 Mechanical Integrity – I reviewed the written procedures Airgas established to maintain the ongoing integrity of its process equipment. I spoke with Airgas's Facility Manager and other representatives for Airgas, who explained the facility's mechanical integrity program and procedures. I reviewed the facility's inspection records for several tanks, pressure relief valves, and other RMP covered equipment. Airgas utilizes appropriate equipment surveillance and preventative maintenance activities for the process equipment. The facility uses a third-party contractor to maintain and conduct inspections on equipment. During the inspection, Airgas provided training records of personnel who are American Petroleum Institute (API) certified. In addition, I requested any overdue inspection or testing on fixed or rotating equipment. Airgas indicated and provided documentation to show that there was no overdue process equipment at the time of the inspection.

40 C.F.R. § 68.75 Management of Change (MOC) – I reviewed Airgas's MOC procedure. 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. Airgas's MOC procedure indicates that the "MOC Coordinator" has verified that all steps of the MOC process have been completed, that all sign offs have been received, that all post-startup actions have been completed, and that the supporting documentation is available in the electronic MOC record. I requested a sample of MOCs, and Airgas indicated that they did not have any MOCs available to review. I followed through to ensure there were

none available through their Intelex database which houses and tracks any MOCs at the facility. I observed no areas of concern within this element at the time of the inspection.

40 C.F.R. § 68.77 Pre-startup Safety Review (PSSR) – I requested Airgas’s pre-startup safety reviews for any associated MOCs. There were no PSSRs available to review at the time of the inspection. After implementation of an MOC, the MOC Initiator shall attach all relevant documentation to the MOC record. This could include, but is not limited to, ‘as-built’ P&IDs, red-lined SOPs, training documentation and the completed PSSR.

40 C.F.R. § 68.79 Compliance Audits – Airgas provided their two most recent certified RMP Compliance Audits conducted in September 2021 and April 2025. Both compliance audits were conducted by at least one person knowledgeable in the process. The audit team consists of Airgas’s employees and resources not residing at the facility. When conducting its RMP compliance audits, Airgas uses procedural reviews, interviews, field verifications, and a representative sampling of records which provided insight into the adequacy of the design and implementation of the program relative to the requirements of EPA’s RMP rule and OSHA PSM standards. Airgas also provided their compliance audit certifications during the inspection.

40 C.F.R. § 68.81 Incident Investigation – Airgas provided a list of all incident investigations that occurred within the past five years. Of those reviewed, the incident investigation team consisted of at least one person knowledgeable in the process involved. Airgas has an incident management standard work practice procedure for both near-miss and incident reporting. Airgas did not have any incidents that could have resulted in, or could reasonably have resulted in, a catastrophic release of a regulated substance.

40 C.F.R. § 68.83 Employee Participation – Airgas developed a written plan of action regarding the implementation of the employee participation required by this section, which is integrated into the program elements. Airgas written plan describes how they consult with employees on the performance and development of process hazard analyses, and on the development of the other elements of process safety management required under the rule. The action plan provides employees access to process hazard analyses and to all other information that must be developed under this rule.

40 C.F.R. § 68.85 Hot Work Permit – Airgas provided their hot work and safe work procedure that detailed guidance for hot work/safe work activities at the site. The facility discussed the process for conducting hot work onsite. I requested and reviewed a sample of hot work permits. There were no areas of concern noted from the review and follow up on implementation of hot work permits.

40 C.F.R. § 68.87 Contractors – I reviewed Airgas’s contractor procedure. Airgas evaluates contractors through their contractor packet. The packet consists of pre-qualification forms, evaluations, and screening questions to appropriately select the contractor. Their system requires each contractor to be evaluated based on the risk category of their work. All contractors that will perform work at the facility

shall receive and maintain the following training prior to work: OSHA Training, Airgas Site Specific Training, Unit Specific Training, and Contractor Specific Training. Contractors are also informed of known potential hazards, provisions of the Emergency Action Plan (EAP), and health and safety procedures through the work permit procedure. The Airgas - LaPorte site implements safe work practices consistent with 40 C.F.R. § 68.69(d), to control the entrance and exit of the contract employees via the security gate.

Subpart E – Emergency Response

40 C.F.R. § 68.90 Applicability – Airgas is designated as a “non-responding” stationary source in case of an accidental release of a regulated substance; therefore, the facility need not comply with the requirements of 40 C.F.R. § 68.95.

40 C.F.R. § 68.93 Emergency Response Coordination Activities – I reviewed Airgas’s Emergency Action Plan (EAP). The EAP indicates that it is intended to provide a standard for preparing for a fire, explosion and chemical release to ensure the safety of associates. I requested coordination documentation with La Porte Fire Department and other local emergency planning and response organizations. At the time of the inspection, Airgas failed to provide documentation of coordination with local authorities that included the names of the individuals involved, their contact information, and the nature of the coordination for the recent coordination activities that took place. Specifically, the facility could not provide documentation (e.g., meeting minutes, emails, letter, or agreements) showing coordination activities with their appropriate LEPC that reflects the dates of coordination activities, what activities took place, the content discussed, and the names of individuals involved and their contact information **[AOC 1 - 40 C.F.R. § 68.96(c)]**. Airgas did provide a generic coordination letter for their LEPC/Local Fire Department after the inspection **[Appendix 2]**.

40 C.F.R. § 68.96 Emergency Response Exercises – As part of coordination with local emergency response officials, required by §68.93, Airgas consulted with officials to establish an appropriate frequency for field exercises.

Section III – AREAS OF CONCERN

AOC 1 - Emergency Response Exercises – 40 C.F.R. § 68.96(c) requires the owner or operator of a stationary source shall 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. Specifically, the owner or operator shall document coordination with local authorities, including: The names of individuals involved and their contact information (phone number, email address, and organizational affiliations); dates of coordination activities; and nature of coordination activities.

Airgas failed to provide documentation showing coordination activities with their appropriate LEPC that reflects the dates of coordination activities, what activities took place, the content discussed, and the names of individuals involved and their contact information.

Closing Conference

EPA Region 6 inspector, Charese Simpson ("I"), conducted a closing conference at Airgas Specialty Products – La Porte on August 28, 2025. During the closing conference, I reviewed the area of concern noted above. There were fielded questions from Airgas's personnel, and I provided information about the next steps in the inspection process.

Section IV – FOLLOW UP

Additional documentation was received by EPA on 9/3/2025, 9/5/2025 and 9/13/2025, after exiting the Facility on August 28, 2025.

Section V – LIST OF APPENDICES (Confidential Business Information (CBI) appendices is not included in published version of the report)

- Appendix 1 – Opening/Closing Sign-in Sheet
- Appendix 2 – Generic LEPC/Local Fire Department Coordination Letter