



Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	02/13/2024	
Media Program:	Air	
Regulatory Program(s)	Title V, NESHAP, NSPS, SIP	
Company Name:	Chevron Phillips Chemical Company	
Facility Name:	Port Arthur Plant	
Facility Physical Location:	2001 S Gulfway Dr	
(city, state, zip code)	Port Arthur, TX 77640	
Mailing address:	2001 S Gulfway Dr	
(city, state, zip code)	Port Arthur, TX 77640	
County/Parish:	Jefferson County	
Facility Phone Number	1-409-985-0726	
Facility Contact:	Kevin Mercy mercyk@cpchem.com	Environmental Supervisor
FRS Number:	110020148008	
Identification/Permit Number:	Title V Federal Operating Permit O-1235	
Media Identifier Number:	AFS 48-245-00125; 48-245-00162	
NAICS:	325110-Petrochemical Manufacturing; 325199-All Other Basic Organic Chemical Manufacturing	
SIC:	2869-Industrial Organic Chemicals, Not Elsewhere Classified	
Personnel participating in inspection:		
Nicholas Bobbs	EPA OECA AED	Lead Air Inspector
Daniel Heins	EPA OECA AED	Air Inspector
Philip Myers	EPA NEIC	Environmental Engineer
Conor Goulding	EPA NEIC	Physical Scientist
Kevin Mercy	Chevron Phillips Chemical Company	Environmental Supervisor
Connie Weber	Chevron Phillips Chemical Company	EHSS Manager
Davis Turner	Chevron Phillips Chemical Company	Technical Manager
Jim Dykes	Chevron Phillips Chemical Company	Maintenance Manager
James Alan Johnson	Chevron Phillips Chemical Company	Aromatics Operator
Hayden Guidry	Chevron Phillips Chemical Company	Environmental Specialist
Gary Parsley	Chevron Phillips Chemical Company	Plant Manager
Brian Kubsch	Chevron Phillips Chemical Company	Ops Manager
EPA Lead Inspector Signature/Date	NICHOLAS BOBBS Digitally signed by NICHOLAS BOBBS Date: 2024.04.12 08:59:47 -04'00'	
	Nicholas Bobbs	Date
Supervisor Signature/Date	GREGORY FRIED Digitally signed by GREGORY FRIED Date: 2024.04.12 09:09:55 -04'00'	
	Gregory Fried	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA inspectors Nicholas Bobbs and Daniel Heins (EPA Office of Enforcement & Compliance Assurance - Air Enforcement Division), accompanied by Philip Myers and Conor Goulding (EPA National Enforcement Investigations center, "NEIC") arrived at the Chevron Phillips Chemical Company – Port Arthur Plant (the "Facility") at 15:00 on 2/13/2024 for an unannounced inspection. We met Kevin Mercy, Environmental Supervisor, Connie Weber, EHSS Manager, and other facility personnel for an opening conference. Credentials were presented to Mr. Mercy, and we informed them that this was an EPA inspection to evaluate potential sources of excess emissions using EPA's Geospatial Measurement of Air Pollution ("GMAP") vehicle and evaluate compliance with the facility's Title V Air Permit and the Clean Air Act. The scope of the inspection is a partial evaluation ("PCE"). This inspection occurred as part of a multi-scale monitoring project in the Beaumont-Port Arthur area. The sign-in sheet for the opening conference is attached as Appendix 1.

FACILITY DESCRIPTION

The Facility is a petrochemical manufacturing plant that operates under Title V Permit number O-1235 issued August 29, 2018 and revised effective March 2023. The Port Arthur plant manufactures ethylene, propylene, and cyclohexane. The Facility is adjacent to the Valero Port Arthur Refinery and shares some air pollution control devices with Valero.

Cyclohexane is mainly used in the industrial production of nylon and is produced by hydrogenation of benzene. Ethylene and propylene are used as building blocks for various polymers and other products.

The Facility conducts fence line monitoring at 18 locations for benzene under an existing Consent Decree (Civil Action No. 4:11-cv-437) with EPA. The monitoring started in June 2023, and has shown elevated concentrations of benzene at locations PAC-5, PAC-6, and PAC-15.

Section II - OBSERVATIONS

The NEIC GMAP was driven by Mr. Goulding and the instruments were operated by Mr. Myers. A Facility representative, Mr. Mercy, followed the GMAP. Conditions were fair with winds from the SW. Mr. Bobbs and Mr. Heins followed the GMAP in a secondary vehicle, and operated a Data Acquisition in Real Time ("DART") unit on their vehicle, equipped with a photoionization detector ("PID") that measures volatile organic compounds ("VOC") in the air, and a wind monitor that monitors wind speed, wind direction and geolocation. The DART unit had a 10.6ev PID installed. The GMAP drove on all available facility roads measuring air pollutant concentrations downwind of each of the process areas, if possible. A full report from the GMAP will be issued by NEIC at a later date.

The inspection team observed benzene fence line monitoring location PAC-15, which is near Flare 40. Mr. Mercy informed us that Flare 40 controls the cyclohexane unit and tanks owned by Valero. The Valero tanks were de-inventorying at the time of the inspection, and Flare 40 was active.

The inspection team observed the tank farm owned by the Facility, which is separate from the main site and on the east side of Route 87. The tank farm had 5 tanks in use. The inspection team observed monitor locations PAC-5 and PAC-6, which are on the fence line of the tank farm. See Table 1 for the tank numbers and their contents at the time of the inspection.

Table 1

Tank Number	Contents
834	Offspec Cyclohexane
816	Cyclohexane
822	Cyclohexane
815	Benzene
800	Benzene

Mr. Mercy explained that benzene from tanks 815 or 800 is sent to the hydrogenation unit to produce cyclohexane, which is sent to tanks 822 or 816. At the time of the inspection, Tanks 800 and 816 were active i.e., the facility was drawing benzene off tank 800 and sending cyclohexane to tank 816. Tank 834 was also active, as offspec cyclohexane was being drawn off to send to distillation.

The GMAP and DART did not have any significant findings at the time of the inspection.

The site GMAP survey ended at 16:45 and we returned to the conference room/parking lot.

Section III – AREAS OF CONCERN

Mr. Bobbs conducted a closing conference at Chevron Phillips Chemical Company – Port Arthur Plant at 17:00 on February 13, 2024, for the inspection. Mr. Myers and Mr. Bobbs summarized the facility tour and presented their emissions observations. The inspection team had no Areas of Concern at the time of the closing conference. We departed the Facility at 17:15.

Section IV – FOLLOW UP

No additional information was received by EPA after exiting the Facility on February 13, 2024.

Section V – LIST OF APPENDICES

Appendix 1 – Opening Conference Sign-in Sheet

Appendix 1

Opening Conference Sign-In Sheet

Name

Title

Jim Dykes

Maint Mgr.

Davis Turner

Technical Mgr

Connie Weber

EHSS Mgr

James Alan Johnson

(Silsbee) Aromatics Operator

Daniel Heins

Air Inspector - US EPA - OECA-AED

Hayden Guidry

Environmental Specialist

GARY PARSLEY

PLANT MANAGER

Phil Myers

Mech. Engineer EPA

Conor Gardins

EPA NEIC

Kevin Mercy

Env. Superintendent

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Nicholas Bobbs

Env Eng. EPA

B Wbsch

Dps Manager

VISIT BY EPA

2/13/24 3pm