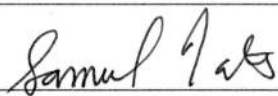




Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT

Inspection Date(s):	07/22-24/2019		
Media:	Air		
Regulatory Program(s)	RMP Clean Air Act Section 112(r) and 40 C.F.R. Part 68 Chemical Accident Prevention Provisions		
Company Name:	Ineos		
Facility Name:	Gemini HDPE LLC – La Porte Plant		
Facility Physical Location:	1230 Independence Parkway South		
(city, state, zip code)	La Porte, TX 77571		
Mailing address:	1230 Independence Parkway South		
(city, state, zip code)	La Porte, TX 77571		
County/Parish:	Harris		
Facility Contact:	Morgan French	SHE Manager	
	Morgan.french@ineos.com		
FRS Number:			
Identification/Permit Number:			
Media Number:	RMP: 1000 0023 6185		
NAICS:	325211		
SIC:			
Personnel participating in inspection:			
Robert Bradshaw	INEOS	Site Manager	713-307-3437
Carlos Sanchez	INEOS	PSM	281-535-3355
Don Turner	INEOS	Safety Engineer	713-307-3533
Stephen Jackson	INEOS	PSM Coordinator	713-307-3468
William Steiner	INEOS	Lead Engineer	713-307-3370
EPA Lead Inspector Signature/Date	 Sherronda Phelps		9/10/2019 Date
Supervisor Signature/Date	 Samuel Tate		7/10/2019 Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

I, United States Environmental Protection Agency (EPA) Region 6 Inspector Sherronda Phelps, arrived at the Gemini HDPE – La Porte Plant at approximately 9:30 AM on Monday July 22, 2019 for an announced inspection. I presented my credentials and informed INEOS personnel that this was an EPA inspection to determine compliance with the facility's Chemical Accident Prevention Provisions Program. The scope of the inspection was a partial compliance evaluation (PCE) and included an evaluation of the compliance of the facility with the Clean Air Act (CAA) Section 112(r) and the Chemical Accident Prevention Provisions (40 C.F.R. Part 68). The Gemini HDPE – La Porte Plant is listed as a Risk Management Plan (RMP) Program three (3) facility. INEOS is not a union facility. The Texas Commission on Environmental Quality was notified of this PCE inspection and did not participate during this inspection.

FACILITY DESCRIPTION

INEOS operates Gemini HDPE, a polyethylene manufacturing facility which is co-located with INEOS Battleground Manufacturing. The facility is in LaPorte, Texas. Gemini is a facility which receives and/or stores various regulated chemicals by railcar, trucks and pipelines. The products stored, handled or processed onsite include propane, ethylene, 1-butene, isobutane, ethane and hydrogen. Approximately 24 INEOS full time employees (FTEs) operate the facility for Gemini HDPE LLC.

Section II - OBSERVATIONS

On Monday July 22, 2019, Morgan French, SHE Manager and I conducted a site tour of the Gemini HDPE Unit to observe the covered process, equipment, and operations. William Steiner, Lead Engineer, provided a process overview of the unit.

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

Subpart A – General

40 C.F.R. § 68.10 Applicability – Gemini HDPE is a stationary source with a CAA Title-V permit (O-3758) that has more than a threshold quantity of regulated substances in their process. The first RMP submittal was made on August 1, 2017. Gemini HDPE is a RMP Program 3 facility. The facility is subject to the Occupational Safety and Health Administration's (OSHA) Process Safety Management (PSM) Standard (29 CFR § 1910.119).

40 C.F.R. § 68.12 General requirements- Gemini HDPE submitted their first RMP on August 1, 2017. The regulated substances ethylene, isobutane, ethane and hydrogen are the regulated substances listed over the threshold for the Program Level 3 processes.

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

Subpart B – Hazard Assessment

40 C.F.R. § 68.20 Applicability- Gemini operates a program level 3 process which is subject to this subpart and thus is required to prepare a worst-case release scenario analysis and complete the five-

year accident history. I reviewed the documentation provided to make this analysis and identified no area of concern with information pertaining to sections 40 C.F.R. §§ 68.22 – 68.33 or any Offsite Consequence Analysis (OCA) data. The facility used the EPA Model RMP*Comp™.

40 C.F.R. § 68.36 Review and update – Gemini understands documentation associated with the Worst-case scenarios should be updated and reviewed at least every five years and are anticipating a review in 2022.

40 C.F.R. § 68.39 Documentation – Gemini operates a program level 3 process which is subject to this subpart and thus is required to prepare a worst-case release scenario analysis and complete the five-year accident history. I reviewed the documentation provided to make this analysis and identified no area of concern with information pertaining to sections 40 C.F.R. §§ 68.22 – 68.33 or any Offsite Consequence Analysis (OCA) data. The facility used the EPA Model RMP*Comp™.

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

Subpart D – Program 3 Prevention Program

40 C.F.R. § 68.65 Process safety information – I reviewed various sections of process safety information for the RMP units at Gemini HDPE.

40 C.F.R. § 68.67 Process Hazard (PHA) – I reviewed the Process Hazard Analysis (PHA) for the RMP. The June 8, 2017 PHA study was conducted using What-if, Checklist, and Layer of Protection Analysis (LOPA).

40 C.F.R. § 68.69 Operating procedures – EPA reviewed several operating procedures for the Gemini HDPE process. I reviewed and discussed with Gemini personnel operating procedures, which included the Standard Operating Procedure Certification, Confined Space Entry, and Lockout/Tag out Procedures. Gemini certified that the operating procedures were current, accurate, and that the procedures were reviewed as often as necessary, as required by this subpart, and used a single certification document for operating procedures annually.

40 C.F.R. § 68.71 Training – I requested and was provided the training files for several employees at different experience levels. Given the newness of the unit several of the operators are not set to have refresher training on its procedures until the year 2020. Of the employee files reviewed, all took the initial training to operate within the unit.

40 C.F.R. § 68.73 Mechanical integrity – I reviewed Mechanical integrity records for randomly selected inspections of RMP covered equipment and the written procedure for maintaining the integrity of the process.

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

40 C.F.R. § 68.77 Pre-startup safety review – Gemini provided documentation regarding pre-startup safety review.

40 C.F.R. § 68.79 Compliance audits – The Gemini Unit was commission and went through start up in late 2017. The initial RMP for the unit was submitted on August 8, 2017. An internal PSM/RMP audit of the INEOS Battleground Manufacturing Complex site (which includes the Gemini Unit) was conducted in March 2019. A draft audit report is currently being reviewed prior to being finalized and released. There was a previous audit conducted in early 2016 but the Gemini Unit was not included as it was still under construction.

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

40 C.F.R. § 68.83 Employee participation – Gemini implemented the requirements of this subpart.

40 C.F.R. § 68.85 Hot work permit – Gemini discussed the process for conducting hot work onsite and several hot work permits were reviewed. Hot work permits reviewed looked satisfactory.

40 C.F.R. § 68.87 Contractors – Gemini uses Zachry, a vetted contractor, to conduct in house maintenance. Gemini uses ISNET World for its contractor selection and assures that all contractors that may work on site have been trained on the potential hazards related to both the process equipment and the work that the contractor may perform.

Subpart E – Emergency Response

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

40 C.F.R. § 68.95 Emergency response program – I reviewed the Emergency Response Plan at INEOS.

Subpart G – Risk Management Plan

40 C.F.R. § 68.190 Updates – No updates to submit as the initial RMP was submitted on August 1, 2017.

40 C.F.R. § 68.195 Required corrections – The next RMP re-submission is due August 2022, unless an update or correction is required by 40 C.F.R. § 68.190 and § 68.195.

Section III – AREAS OF CONCERN

There were no areas of concern noted during the site visit.

Section IV – FOLLOW UP

No information was received by EPA after exiting the Facility on July 24, 2019.