



Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	06/23/2025 – 6/25/2025	
Media Program:	Air	
Regulatory Program(s)	RMP	
Company Name:	Trecora	
Facility Name:	Trecora WAX LLC	
Facility Physical Location:	12500 Bay Area Blvd.	
(city, state, zip code)	Pasadena, Texas 77507	
Mailing address:	12500 Bay Area Blvd.	
(city, state, zip code)	Pasadena, Texas 77507	
County/Parish:	Harris County	
Facility Phone Number	281-474-7500	
Facility Contact:	Douglas Wallace	EHS Director
	Douglas.wallace@trecora.com	
FRS Number:	110069449378	
Identification/Permit Number:	N/A	
Media Identifier Number:	100000089771	
NAICS:	325199 - All Other Basic Organic Chemical Manufacturing	
SIC:	N/A	
Personnel participating in inspection:		
Sherronda Phelps	US EPA Region 6	CAA RMP Inspector
Rigo Montemayor	Trecora	Maintenance Manager
Susan Bice	Trecora	Enviro Tech
Keyur Mehta	Trecora	PSM Engineer
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Jason Clayborn	Trecora	Safety Engineer
EPA Lead Inspector Signature/Date	<i>Sherronda Phelps</i> Sherronda Phelps	8/28/2025 Date
Supervisor Signature/Date	CARLOS FLORES Digitally signed by CARLOS FLORES Date: 2025.08.29 10:35:46 -05'00' Kayla Buchanan	 Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

I, EPA Region 6 Inspector Sherronda Phelps, arrived at the Trecora WAX LLC (Trecora) facility at 9:00 AM on June 23, 2025, for an announced inspection. I was met by Doug Wallace (EHS Director) and other Trecora representatives at the Opening Conference. I presented my credentials to Mr. Wallace and Trecora representatives at the Opening Conference and informed them that this EPA inspection focused on the implementation the Clean Air Act (CAA) Section 112(r) and was a partial compliance evaluation (PCE), which included an evaluation of Trecora's compliance with the Chemical Accident Prevention Provisions in 40 C.F.R. Part 68.

FACILITY DESCRIPTION

Trecora is comprised of multiple polyethylene facilities and a propylene facility. Trecora produces Polyols and Co-Polymers through batch reaction technology. Trecora is located in Pasadena, Texas and employs 113 full-time employees. The polyethylene facility manufactures polyethylene for a wide variety of industrial and consumer applications. Trecora is a batch facility where the manufacturing process uses ethylene as the basic building block for producing polyethylene. The regulated substances above the threshold quantity within the polyethylene facility include ethylene, propylene, and allyl alcohol.

Section II – OBSERVATIONS

EPA's onsite inspection began with a documentation review with the Trecora personnel listed on the sign in sheets. **(See Appendix 1)**

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

Subpart A – General

40 C.F.R. § 68.10 Applicability – Trecora is a stationary source that has more than the threshold quantities of regulated substances in their processes. The last Risk Management Plan (RMP) submittal was made April 8, 2024, and was the required 5-year update pursuant to 40 C.F.R. § 68.19(b)(1). The facility is subject to the Occupational Safety and Health Administration's (OSHA) Process Safety Management (PSM) Standard (29 C.F.R. § 1910.119).

40 C.F.R. § 68.12 General requirements – Trecora submitted their most recent RMP submission on April 8, 2024. The regulated toxic and flammable substances are over the threshold quantity for the RMP Program Level 3 processes are listed.

40 C.F.R. § 68.15 Management – Trecora developed a management system to oversee the implementation of the Risk Management Program elements. Trecora provided an organizational chart that outlined the positions to implement the individual elements of the Risk Management Program as required by this subpart.

Subpart B – Hazard Assessment

40 C.F.R. § 68.20 Applicability – Trecora operates RMP Program Level 3 processes which are subject to this subpart and are required to prepare a worst-case release scenario and to complete the five-year accident history. I reviewed the documentation provided worst-case release scenario and identified no areas of concern with this subpart.

40 C.F.R. § 68.22 Offsite Consequence Analysis Parameters – Trecora used 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.

40 C.F.R. § 68.25 Worse-Case Release Scenario Analysis – Trecora identified and analyzed at least one worst-case releases scenario for its Program Level 3 processes using the RMP*Comp™ software, which appears to meet the requirements of this subpart.

40 C.F.R. § 68.28 Alternative Release Scenario Analysis – Trecora identified and analyzed at least one alternative release scenario in its Program 3 processes using the RMP*Comp™ software, which appears to meet the requirements of this subpart.

40 C.F.R. § 68.30 Defining Offsite Impacts- Population – Trecora used the most current Census Bureau population data and the distances to endpoints to calculate the population numbers reported in their RMP, which appears to meet the requirements of this subpart.

40 C.F.R. § 68.33 Defining Offsite Impacts- Environment – Trecora 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 – Trecora understands documentation associated with the worst-case scenarios should be updated and reviewed at least every five years. Trecora will be conducting the required review in 2026.

40 C.F.R. § 68.39 Documentation – Trecora operates RMP Program Level 3 processes, which are subject to this subpart and are required to prepare a worst-case release scenario analysis and complete the five-year accident history. I reviewed the documentation provided for the worst-case release scenario and identified no areas of concern with the provided information pursuant to this subpart. This included the Offsite Consequence Analysis (OCA) data. The facility used the RMP*Comp™ software.

40 C.F.R. § 68.42 Five-year Accident History – Trecora did not report any accidental releases in their RMP, which resulted in deaths, injuries, or significant property damage.

Subpart D – Program 3 Prevention Program

40 C.F.R. § 68.65 Process Safety Information (PSI) – EPA reviewed various sections of the process safety information (PSI) for the RMP covered processes at Trecora. There were no areas of concern identified pursuant to this subpart.

40 C.F.R. § 68.67 Process Hazard Analysis (PHA) – EPA reviewed the process hazard analysis (PHA) procedure and schedule for the RMP covered processes. EPA reviewed several recommendations for

timeliness and proper documentation. Trecora used the hazard and operability analysis (HAZOP) method to conduct the PHA study. No areas of concern were observed from the information reviewed pursuant to this subpart.

40 C.F.R. § 68.69 Operating Procedures – EPA reviewed and discussed with Trecora personnel the operating procedures for several units, which included the standard operating procedure (SOP) certification procedure, confined space entry, and lockout/tag out procedures. EPA requested the last 5 years of annual operating procedure certifications and all were current. EPA reviewed several critical procedures while onsite. Several of these critical procedures failed to include the consequences of deviations or emergency shutdown procedures. Trecora failed to address the emergency shutdown elements pursuant to 40 C.F.R. § 68.69(1)(iv) in their operating procedures. **[AOC 1]** Trecora also failed to address the operating limits elements as required by 68.69(2)(i) in their operating procedures. **[AOC 2]**

40 C.F.R. § 68.71 Training – Trecora established the initial RMP and refresher training for its operators pursuant to this subpart. Operator training consists of both on-the-job training and computer-based training. Written tests were used to evaluate operator competency. As a new hire, at least three to four months is allocated to initial job training. RMP refresher training is required every three years pursuant to this subpart or sooner if necessary. EPA requested several training records for review and was provided the files for several employees with different experience levels. I reviewed the employee training records and determined the trainings provided to operate in the unit were current and the refresher trainings were administered as required. There were no areas of concern noted from the information reviewed pursuant to this subpart.

40 C.F.R. § 68.73 Mechanical Integrity – I reviewed mechanical integrity (MI) records for randomly selected inspections of RMP covered equipment and the written MI procedure (PSM-009) for maintaining the integrity of the process. In 2024, Trecora implemented a new maintenance work order system, Data Corp. Data Corp. aids the facility in tracking work orders and their progress towards completion. Also, the Data Corp. system tracks the frequency of preventative maintenance requests. Trecora provided a list of rotating equipment overdue or past due for inspection. **(See Appendix 2)** Trecora failed to implement the frequency of inspections and tests on process equipment, as required pursuant to 40 C.F.R. § 68.73 (d)(3). **[AOC 3]**

40 C.F.R. § 68.75 Management of Change (MOC) – EPA reviewed and discussed written procedures for management of change (MOC) with site personnel. EPA also evaluated how the MOC procedures were implemented at the facility. The MOCs were implemented using their onsite SharePoint site. EPA reviewed several MOCs over the last five years. They were reviewed for proper implementation and completeness. EPA did not identify any areas of concern pursuant to this subpart at this time.

40 C.F.R. § 68.77 Pre-startup Safety Review (PSSR) – Trecora has established and implemented procedures to perform a pre-startup safety review (PSSR) for new stationary sources and modifications of stationary sources onsite when the change is significant enough to require a change in process safety information. EPA evaluated the MOCs requested for review from the facility. The procedures for PSSRs are being implemented as required. All the necessary signatures and required safety checks were completed. EPA did not identify any areas of concern noted pursuant to this subpart at the time of the inspection.

40 C.F.R. § 68.79 Compliance Audits – EPA requested the two most recent compliance audits for review. Trecora provided compliance audit reports completed in November 2021 and December 2024. All the audit recommendations were tracked to completion via Intalex. EPA did not identify any areas of concern pursuant to this subpart at this time.

40 C.F.R. § 68.81 Incident Investigation - I reviewed a list of incident reports and investigations for all incidents, which resulted in or could have reasonably resulted in, a catastrophic release of a regulated substance during the last five years. Of the incident investigations I reviewed, I noted that one incident investigation was not initiated within the 48-hour window required by this subpart (Incident No. 5976). The incident report stated that the incident occurred on December 3, 2021; however, the investigation was not initiated until December 6, 2021. Trecora failed to implement 40 C.F.R. § 68.81(b) as required pursuant to this subpart. **[AOC 4]**

40 C.F.R. § 68.83 Employee Participation – Trecora implemented the requirements of this subpart. EPA did not identify areas of concern at this time regarding employee participation.

40 C.F.R. § 68.85 Hot Work Permit – Trecora discussed the process for conducting hot work onsite and the process of issuing hot work permits. I reviewed several hot work permits that were issued during the first two quarters of 2025. Several hot work permits were not signed by the issuer and other hot work permits failed to make the proper selections to identify the activity as hot work. All hot work permits are retained for three years as required by the regulation. Trecora failed to properly implement their hot work permit procedure pursuant to 40 C.F.R. § 68.85. **[AOC 5]**

40 C.F.R. § 68.87 Contractors – Trecora utilizes several contractors to conduct maintenance projects along with other as needed services depending on the scope of work. Trecora uses Avetta for its contractor selection, which assures that all contractors that may work onsite are trained on the potential hazards related to both the process equipment and the work that the contractor may perform. Performance reviews are conducted annually. Currently, there is no dedicated entrance for contractors; however, Trecora is working to get a separate badging system in place. There were no areas of concern noted at the time of the inspection pursuant to this subpart.

Subpart E – Emergency Response

40 C.F.R. § 68.90 Applicability –Trecora is a first responder stationary source, which means in case of an accidental release or emergency situation Trecora would be the first to respond; therefore, the facility must comply with the requirements of 40 C.F.R. §§ 68.93, 68.95, and 68.96.

40 C.F.R. § 68.93 Emergency Response Coordination Activities – Trecora implemented the requirements of this subpart, which included coordination with the Local Emergency Planning Committee and the local Fire Department. No areas of concern pursuant to this subpart were noted during the inspection.

40 C.F.R. § 68.95 Emergency Response Program – Like mentioned above, Trecora is the first to respond to an accidental release or emergency at the facility. EPA reviewed the facility's Emergency Response Plan. Trecora has an Emergency Response Team (ERT) of 40 employees from different process units and participation is voluntarily. The Emergency Response Plan details the steps to take in the event of a

release of regulated substances. EPA reviewed training records for several ERT members and no areas of concern were identified pursuant to this subpart.

40 C.F.R. § 68.96 Emergency Response Exercises – Trecora provided documentation of the required emergency response exercises. No areas of concern were identified pursuant to this subpart.

Subpart G – Risk Management Plan

40 C.F.R. § 68.190 Updates – No updates.

40 C.F.R. § 68.195 Required corrections -The next RMP re-submission is due by August 12, 2026, unless an update or correction is required by 40 C.F.R. §§ 68.190 and 68.195.

Section III – AREAS OF CONCERN

- 1) **Operating Procedures, 40 C.F.R. § 68.69** - EPA reviewed several critical procedures while onsite, several failed to include emergency shutdown procedures. Trecora failed to address emergency shutdown in their operating procedures pursuant to 40 C.F.R. § 68.69(1)(iv).
- 2) **Operating Procedures, 40 C.F.R. § 68.69** - EPA reviewed several critical procedures while onsite; however, several failed to include consequences of deviations or emergency shutdown procedures. Trecora also failed to address operating limits in their operating procedures pursuant to 40 C.F.R. § 68.69(2)(i).
- 3) **Mechanical Integrity, 40 C.F.R. § 68.73** – EPA requested a list of mechanical integrity inspections that were late for their equipment subject to this subpart. Trecora provided a list of overdue inspections for their rotating equipment. **(See Appendix B)** Trecora failed to implement the appropriate frequency of mechanical integrity inspections and tests for process equipment pursuant to 40 C.F.R. § 68.73 (d)(3).
- 4) **Incident Investigations, 40 C.F.R. § 68.81** - Trecora provided list of incident reports and investigations for all incidents, which resulted in or could have reasonably resulted in, a catastrophic release of a regulated substance for the last five years. Of the incident investigations reviewed, one incident investigation (Incident No: 5976) was noted for failing to initiate an investigation within 48 hours pursuant to 40 C.F.R. 68.81(b).
- 5) **Hot Work Permits, 40 C.F.R. § 68.85** - EPA reviewed hot work permits issued during the first two quarters of 2025. Several hot work permits failed to be signed by the issuer and others failed to make the proper selection on the permit to signify it was a hot work permit. Trecora failed to properly implement their Hot Work Issuance procedure pursuant to 40 C.F.R. § 68.85.

Closing Conference

I, EPA Region 6 Inspector Sherronda Phelps, conducted a closing conference at Trecora WAX LLC on June 25, 2025, for the inspection. During the closing conference, I reviewed the Areas of Concern noted during the inspection, noted and responded to any questions from facility personnel, and provided information about the next steps in the inspection process.

Section IV – FOLLOW UP

No additional information was requested or received by EPA after exiting the Trecora facility on June 25, 2025.

Section V – LIST OF APPENDICES

Appendix 1 – Sign In Log Sheets

Appendix 2 – ***CBI Appendices (not included in published version of the report)***

APPENDIX 1



Opening Meeting Sign in Sheet

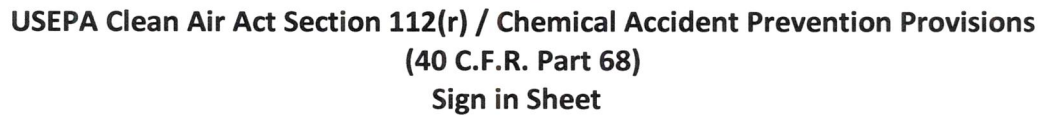
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(40 C.F.R. Part 68)

Sign in Sheet

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Close Out Meeting Sign in Sheet

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