

Region 6 Enforcement and Compliance
Assurance Division
INSPECTION REPORT

Inspection Date(s):	02/15/2022 – 02/17/2022	
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 Risk Management Plan (RMP)	
Company Name:	LACC, LLC US	
Facility Name:	LACC, LLC US	
Facility Physical Location:	2200 Bayou d'Inde Pass	
(city, state, zip code)	Westlake, LA 70669	
Mailing address:	P.O. Box 1316	
(city, state, zip code)	Westlake, LA 70669	
County/Parish:	Calcasieu	
Facility Contact:	Andrew Lavin	EHSS Manager
	Andrew.Lavin@lottechem.com	
FRS Number:	110070031367	
Identification/Permit Number:		
Media Identifier Number:	RMP 1000 0024 0465	
NAICS:	32511 Petrochemical Manufacturing	
SIC:	2869 Industrial Organic Chemicals, Not Elsewhere Classified	
Personnel participating in inspection:		
Tony Robledo	U.S. EPA	Inspector/Enforcement Officer
Glen Jenkins	LDEQ	Inspector
Andrew Lavin	Lotte Chemical	EHSS Manager
Kaili Patterson	Lotte Chemical	Environmental Supervisor
Heather Holbrook	Lotte Chemical	Environmental Coordinator
Lauren Schiffman	Lotte Chemical	PSM Engineer
Carley Simon	Lotte Chemical	EHA Admin Assistant
Mark Peters	Lotte Chemical	Site Executive Director
Maite Sedaba	Lotte Chemical	Process Engineer
Samuel Gauspohl	Lotte Chemical	Mechanical Reliability Engineer
Joshua Cormier	Lotte Chemical	Day Supervisor
Lance Tucker	Lotte Chemical	IH/Safety
Michael Estes	Lotte Chemical	Emergency Response
EPA Lead Inspector Signature/Date		
	Tony Robledo	
Supervisor Signature/Date		
	Samuel Tates	

Section I – INTRODUCTION PURPOSE OF THE INSPECTION

I, Environmental Protection Agency (EPA) Region 6 inspector Tony Robledo, arrived at LACC, LLC US at approximately 9:00 a.m. on February 15, 2022, for an announced inspection. I met with Andrew Lavin, LACC, LLC US (LACC), and LACC staff at the opening meeting. I presented my credentials to him and LACC staff, and informed them that this was an EPA inspection to determine compliance with the Clean Air Act (CAA) Sections 112(r)(1) and 112(r)(7). The scope of the inspection was a partial compliance evaluation (PCE) and included evaluation of the compliance with 40 C.F.R. Part 68 – Chemical Accident Prevention Provisions. Glen Jenkins, Louisiana Department of Environmental Quality (LDEQ) inspector, assisted with this inspection on February 16 – 17, 2022.

FACILITY DESCRIPTION

The facility manufactures ethylene and is owned and operated by LACC, a joint venture between Lotte Chemical Louisiana LLC, a wholly owned subsidiary of Lotte Corporation of South Korea, and Axiall a Westlake Company. The ethylene facility uses ethane in an ethane cracking process to produce up to 1 million metric tons per year of ethylene product. The facility also consists of an Integrated Combustion Control System that consists of an enclosed ground flare and a high-pressure ground flare. The facility handles both regulated flammable and toxic substances above their threshold quantities. The regulated flammable RMP chemicals are 1,3 butadiene, propane, propylene, ethylene, butene, methane, ethane, butane, and pentane. The regulated toxic RMP chemical is chlorine. There are 243 full-time employees at this non-union plant. The plant operates 24 hours a day, seven days a week.

Section II – OBSERVATIONS

Glen Jenkins, LDEQ inspector, and I conducted a walk-through of the facility, accompanied by LACC personnel, to observe the facility process, equipment, pressure vessels, and operations. I observed no spills, leaks, or fugitive hydrocarbon emission trails with the Forward Looking Infrared (FLIR™) Series GF320 camera. Additional observations and findings are found on the RMP Program Level 3 Checklist, located in **Appendix #1**.

Section III – AREAS OF CONCERN

Closing Meeting – I convened a closing meeting on Thursday, February 17, 2022, to discuss the Areas of Concern (AOC) noted during the inspection, the completion process, and to answer questions from LACC personnel.

AOC 1 - 40 C.F.R. § 68.30(b) Defining off site impacts – population

(b) Population to be defined. Population shall include residential population. The presence of institutions (schools, hospitals, prisons), parks and recreational areas, and major commercial, office, and industrial buildings shall be noted in the RMP.

In its worse-case scenario and alternative-release scenarios, LACC failed to identify the presence of public receptors within a circle with its center at the point of release and a radius determined by the distance to the endpoint, as defined in § 68.22(a). LACC used EPA's RMP*Comp program for its offsite consequence analysis and indicated public receptors in its RMP.

AOC 2 – 40 C.F.R § 68.67(f) Process Hazard Analysis (PHA)

(f) At least every five (5) years after the completion of the initial process hazard analysis, the process hazard analysis shall be updated and revalidated by a team meeting the requirements in paragraph (d) of this section, to assure that the process hazard analysis is consistent with the current process. Updated and revalidated process hazard analyses completed to comply with 29 CFR 1910.119(e) are acceptable to meet the requirements of this paragraph.

LACC failed to complete a PHA five years after its initial PHA completed on May 20, 2016. LACC noted that it initiated its most recent PHA on January 25, 2021, but has yet to complete a final report.

AOC 3 – 40 C.F.R § 68.69(c) Operating Procedures

(c) The operating procedures shall be reviewed as often as necessary to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to stationary sources. The owner or operator shall certify annually that these operating procedures are current and accurate.

LACC failed to provide documentation that it conducted an annual certification of its operating procedures for years 2020 and 2021.

AOC 4 – 40 C.F.R § 68.96(b)(1)(i)(ii) Emergency Response Exercises

(b)(1) Emergency response field exercises. The owner or operator shall conduct field exercises involving the simulated accidental release of a regulated substance (i.e., toxic substance release or release of a regulated flammable substance involving a fire and/or explosion).

(i) Frequency. As part of coordination with local emergency response officials required by § 68.93, the owner or operator shall consult with these officials to establish an appropriate frequency for field exercises.

(ii) Scope. Field exercises shall involve tests of the source's emergency response plan, including deployment of emergency response personnel and equipment. Field exercises should include: Tests of procedures to notify the public and the appropriate Federal, state, and local emergency response agencies about an accidental release; tests of procedures and measures for emergency response actions including evacuations and medical treatment; tests of communications systems; mobilization of facility emergency response personnel, including contractors, as appropriate; coordination with local emergency responders; emergency response equipment deployment; and any other action identified in the emergency response program, as appropriate.

LACC failed to conduct emergency response field exercises in coordination with local emergency response officials for the year 2021.

AOC 5 – 40 C.F.R § 68.195(b) Risk Management Plan Required Corrections

(b) Emergency contact information - Beginning June 21, 2004, within one month of any change in the emergency contact information required under § 68.160(b)(6), the owner or operator shall submit a correction of that information.

LACC failed to update in its RMP the name of the designated emergency contact within one month from the retirement of that individual in October 2019. LACC updated its RMP with a new designated emergency contact on February 8, 2022.

Section IV – FOLLOW UP

There were no additional records requested and no additional follow up for this inspection.

Section V – LIST OF APPENDICES

Appendix #1 – RMP Program 3 Checklist

Inspection Symbol Key: Y - Yes, N - No, N/A - Not Applicable;
S - Satisfactory, M - Marginal, U - Unsatisfactory.