EPA United States Environmental Protection Agency

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	April 1-4, 2025	
Media Program:	Air	
Regulatory Program(s)	Clean Air Act (CAA) § 112(r) and 40 Code of Federal Regulations (C.F.R.) Part 68 Chemical Accident Risk Management Plan (RMP)	
Company Name:	**Airgas, Inc.**	
Facility Name:	**Airgas Specialty Products – Waxahachie, TX**	
Facility Physical Location:	6260 I-35 East	
(city, state, zip code)	Waxahachie, Texas 75165	
Mailing address:	2530 Sever Road, Suite 300	
(city, state, zip code)	Lawrenceville, Georgia 30043	
County/Parish:	Gwinnett	
Facility Phone Number	972-576-3202	
Facility Contact:	Michael Lewis	Regional Safety and Compliance Manager
	michael.lewis.asp@airgas.com	
FRS Number:	110000906244	
Identification/Permit Number:	Air Permit Number: 21539	
Media Identifier Number:	RMP 100000060863	
NAICS:	42269 Other Chemical and Allied Products Wholesalers/ 42469 Other Chemical and Allied Products Merchant Wholesalers	
SIC:	N/A	
Personnel participating in inspection:		
Julia Torres	EPA Region 6 ECDAC	RMP Inspector
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Faith Browining	ASP-Waxahachie	Amines Customer Service Representative
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Albert Buelna	ASP-Waxahachie	Plant Manager
Patrick Lansing	ASP-Waxahachie	Regional Operations Manager
Tonya Sumners	ASP-Waxahachie	Vice President of Safety
Paul Holifield	ASP-Waxahachie	Plant Supervisor
EPA Lead Inspector Signature/Date	JULIA TORRES Digitally signed by JULIA TORRES Date: 2025.05.28 08:42:44 -05'00'	
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Supervisor Signature/Date	KAYLA BUCHANAN Digitally signed by KAYLA BUCHANAN Date: 2025.05.28 08:52:32 -05'00'	
	Kayla Buchanan	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

United States Environmental Protection Agency ("EPA") Region 6, inspectors Julia Torres, Aimee Boss, and Elizabeth Pham ("the EPA team", "we") arrived at the Airgas Specialty Products-Waxahachie ("ASP-Waxahachie") facility, operated by Airgas, in Waxahachie, Texas at 9:00 AM on April 1, 2025, for an announced inspection. EPA met with and presented my credentials to Michael Lewis (Regional Safety and Compliance Manager), Tonya Sumners (Vice President of Safety) and their Environmental and Maintenance team at the opening conference. I, Julia Torres, informed them that this was an EPA inspection to evaluate compliance with the requirements of the Chemical Accident Prevention Provisions of Title 40 of the Code of Federal Regulations ("C.F.R.") Part 68 under Clean Air Act ("CAA") § 112(r). An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 C.F.R. § 68.115, shall comply with the requirements of the CFR Part 68. Employee representatives were invited to participate in the inspection. The facility does not have union representation.

FACILITY DESCRIPTION

ASP-Waxahachie is located at 6260 I-35 East, Waxahachie, Texas 75165. The facility is in operation from 8 AM – 5 PM Monday through Friday and has approximately twenty-eight (28) employees at the Waxahachie location. The facility purifies and makes refrigerate-grade anhydrous ammonia for large meat-packing facilities. ASP Waxahachie stores and distributes anhydrous ammonia and aqueous ammonia. ASP Waxahachie also repackages and distributes amines. The facility distributes products to customers via tanker trucks. ASP-Waxahachie stores more than the threshold quantity for the following Risk Management Plan ("RMP") regulated substances: anhydrous ammonia, aqueous ammonia, methylamine ("MMA"), dimethylamine ("DMA"), and trimethylamine ("TMA").

ASP-Waxahachie reported two (2) Program Level 3 covered processes subject to the requirements of EPA's RMP regulations in its most recent RMP submission, dated July 13, 2023.

Section II - OBSERVATIONS

The documentation review began on Tuesday, April 1, 2025, with the ASP-Waxahachie personnel as listed on the sign in sheets, **see Appendix 1.**

On Wednesday, April 2, 2025, and Thursday, April 3, 2025, EPA inspectors were accompanied by Michael Lewis, and other ASP-Waxahachie representatives to conduct a tour of the site, specifically the Anhydrous Ammonia Storage/Ammonium Hydroxide Manufacturing and Ammonium Hydroxide Toting areas. EPA observed the covered processes, emergency equipment, hot work permits, and the control room. ASP-Waxahachie operators can access standard operating procedures (SOPs) electronically. Prior to the tour, ASP-Waxahachie provided us with piping and instrumentation diagrams (P&IDs) of the process units that assisted in the tour.

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

Subpart A – General

40 C.F.R. § 68.10 Applicability – ASP-Waxahachie is subject to the Occupational Safety and Health Administration (OSHA) process safety management (PSM) standard, 29 C.F.R. § 1910.119, and has two Program Level 3 processes under OSHA PSM.

40 C.F.R. § 68.12 General requirements – ASP-Waxahachie submitted their most recent 5-year Risk Management Plan submission on July 13, 2023. The Risk Management Plan listed three (3) chemicals as present in processes with amounts greater than the threshold quantity, prescribed in the standard, and therefore classified as RMP Program 3 regulated substances by rule: Anhydrous Ammonia, Aqueous Ammonia, MMA, DMA, and TMA.

40 C.F.R. § 68.15 Management – ASP-Waxahachie has a management system to oversee the implementation of the RMP Program elements. The EPA team reviewed the ASP-Waxahachie organizational chart that outlined the positions for the implementation of the individual elements of the RMP.

Subpart B – Hazard Assessment

40 C.F.R. § 68.20 Applicability – The owner or operator of a stationary source subject to this part shall prepare a worst-case release scenario analysis as provided in § 68.25 of this part and complete the five-year accident history as provided in § 68.42. The EPA team reviewed the worst-case release scenario analysis and a five-year accident history in the RMP.

40 C.F.R. § 68.22 Off-Site Consequence Analysis ("OCA") Parameters – ASP-Waxahachie used parameters required in this part to calculate toxic and flammable worst-case and alternative release scenarios for 2013 and 2018. One (1) alternative release scenario for anhydrous ammonia, aqua ammonia & amines was verified for 2025. ASP-Waxahachie 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 – The EPA team reviewed the 2013 and 2018 Offsite Consequence Analysis- Worst-Case scenario for a release of Anhydrous Ammonia, Aqueous Ammonia, and the amines (MMA, DMA, and TMA). ASP-Waxahachie analyzed and reported in the RMP their worst-case release scenario, estimated to create the greatest distance to endpoint utilizing RMP*Comp™, and resulting from an accidental release of a regulated toxic substance from a covered process under worst-case conditions. The worst-case release quantity was determined by the greatest amount held in a single vessel, considering administrative controls that limit the maximum quantity released.

40 C.F.R. § 68.28(a) Alternative Release Scenario Analysis – The EPA team reviewed the 2018 Offsite Consequence Analysis- Alternative Case scenario for a release of anhydrous ammonia, aqueous ammonia, and the amines (MMA, DMA, and TMA). ASP-Waxahachie analyzed and reported an alternative release scenario for all chemicals in the RMP. ASP-Waxahachie utilizes RMP*Comp™. to calculate the distance to endpoint

40 C.F.R. § 68.30 Defining offsite impacts-population – ASP-Waxahachie used the most current census bureau population data available in the MARPLOT software to calculate the population numbers reported in their RMP.

40 C.F.R. § 68.33 Defining offsite impacts-environment –The EPA team reviewed the 2018 OCA document with associated MARPLOT maps. ASP-Waxahachie 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 – ASP-Waxahachie submitted their RMP on July 13, 2023. The next 5-year offsite consequence analysis submission is due on July 13, 2028. The EPA team reviewed the most recent offsite consequence analysis submission from 2018. EPA noted ASP-Waxahachie verified the 2018 submission on March 24, 2025.

40 C.F.R. § 68.39 Documentation – ASP-Waxahachie operates two (2) RMP Program level 3 processes subject to this subpart and are required to prepare a worst-case release scenario analysis and complete the five-year accident history. The EPA team reviewed the worst-case and alternative-case scenarios provided. Methodology and explanation of the parameters for the Offsite Consequence Analysis were documented as required by this subpart.

40 C.F.R. § 68.42 Five-year accident history – The EPA team reviewed the five-year accident history for ASP-Waxahachie and OSHA logs for 2022 – 2024. The EPA team also reviewed two (2) incidents reported from 2019 which are considered outside the 5-year accident history for the inspection.

Subpart D – Program 3 Prevention Program

40 C.F.R. § 68.65 Process safety information (PSI) – ASP-Waxahachie maintains a variety of technical documents used to maintain safe operation of the processes. These documents address chemical properties and associated hazards, limits for key process parameters and specific chemical inventories, and equipment design basis/configuration information. Chemical-specific information, including exposure hazards and emergency response/exposure treatment considerations, is provided in safety data sheets (SDSs). In addition, the facility documented safety-related limits for specific process parameters (e.g., temperature, level, composition) in the operation manuals. ASP-Waxahachie ensures that the process is maintained within these limits by using process controls and monitoring instruments, operating procedures, and protective instrument systems. ASP-Waxahachie references using National Fire Protection Association ("NFPA") 55 for designing the amine repackaging process and American National Standards Institute ("ANSI")/Compressed Gas Association ("CGA") G-2.1 for the anhydrous ammonia process.

The EPA team reviewed seven (7) P&IDs for the covered processes and noted inconsistencies within the P&IDs signatures. Six (6) of the P&IDs were missing signatures certifying who they had been drawn by, designed by, checked by, and approved by, see Table 1 **[AOC 1 – 68.65(d)(1)(ii)].**

Table 1. Missing P&ID Signatures

Section Missing Signature	P&ID
Drawn By:	ASP-SP36-F1, ASP-SP36-F2, ASP-SP36-F3, ASP-SP36-F14

Design By:	ASP-SP36-F1, ASP-SP36-F2, ASP-SP36-F3, ASP-SP36-F14
Checked By:	ASP-SP36-F1, ASP-SP36-F2, ASP-SP36-F3, ASP-SP36-F12, ASP-9731-F13, ASP-SP36-F14
Approved By:	ASP-SP36-F1, ASP-SP36-F2, ASP-SP36-F3, ASP-SP36-F12, ASP-9731-F13, ASP-SP36-F14

40 C.F.R. § 68.67 Process hazard analysis (PHA) – We reviewed ASP-Waxahachie's most recent process hazard analyses, conducted in 2018 and 2023, along with the PHA Policy and Revalidation Policy. ASP-Waxahachie has a comprehensive PHA program to ensure that hazards associated with the various processes are identified and controlled. Within this program, the covered process is systematically examined to identify hazards and ensure that adequate controls are in place to manage those hazards. ASP-Waxahachie primarily used the Hazard and Operability ("HAZOP") and What-If techniques on the 2023 PHA to perform these evaluations. The analyses conducted used a team of people who have operating, maintenance, and engineering expertise. As documented in the PHA policy, The Safety Director, along with the Vice President of Safety and Compliance and other Environmental and Maintenance "…shall ensure 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." We reviewed the 2023 PHA and found four (4) recommendations with four (4) associated action plans. Two (2) of the four (4) action items had completion dates past their due date, and one (1) action item with a due date of January 17, 2024 was still open as of April 3, 2025 **[AOC 2 – 68.67(e)]**.

40 C.F.R. § 68.69 Operating procedures – ASP-Waxahachie maintains written procedures that address various modes of operations, such as unit startup, normal operations, temporary operations, emergency shutdown, normal shutdown, and initial startup of a new process. A section of the operating manual contains safe operating conditions and limits for each production area as required which is consistent to process safety information. These procedures can be used as a reference by experienced operators and provide a basis for consistent training of new operators. The written operating procedures are readily available to operators on their phones while in the process area to use as necessary to safely perform their job tasks.

The EPA team reviewed several operating procedures which included: initial startup, normal operations, Lock Out/Tag Out (LOTO), temporary, emergency shutdown, emergency operations and normal shutdowns. ASP-Waxahachie's operating procedures, in Table 2 below, were missing steps, contained general verbiage, used undefined acronyms, and included steps that were not specific enough to the procedure **[AOC 3- 68.69(a)]**. During the facility walkthrough on April 3, 2025, we observed one (1) lockout tag without a lock, which the facility removed while on the tour, and one (1) lockout with a tag that was not filled out. We also reviewed Hazardous Work Permits ("HWPs") for 2023 and 2024. ASP-Waxahachie failed to implement their LOTO operating procedure as well as their Hazardous Work Permit Program. The Hazardous Work Policy states that when a permit is voided or closed, the Team Leader performing the work and an Airgas Qualified HWP Issuer will each respectively record the date, time, printed name (legible), and signature. Several HWPs were missing the signatures of the HWP Issuer, as indicated in Table 2 below **[AOC 4-68.69(d)]**.

Table 2. Hazardous Work Permits Missing Information

Incomplete Section on HWP	HWP Number(s)
Section 1 (General)	102253, 122970, 122971, 122978, 184413, 186419, 227432, 227436, 227442
Section 2 (Hazard Control & Elimination)	184419
Section 3 (Atmospheric Testing)	184419
Section 4 (Acceptance of Responsibility and Authorization)	N/A
Section 5 (Permit Closure)	122970, 122971, 186412, 186413, 227430, 227425,

40 C.F.R. § 68.71 Training – ASP-Waxahachie provided the EPA team with their Training Policy. ASP-Waxahachie has implemented a training program for all employees involved in operating a process. All operations employees receive basic training for the facility operations. ASP-Waxahachie operators must go through a training program, which includes the following: on-the-job training, testing process that is written and computer-based, and a series of field demonstration tests. ASP-Waxahachie was also able to provide initial and refresher training records for multiple employees addressing an overview of the process, operating procedures, and Hazardous Waste Operations and Emergency Response ("HAZWOPER"). Operators complete their initial HAZWOPER and annual refresher training through a third-party, accessed on the online Airgas University platform. The annual Ammonia Awareness Training is completed in-house and is tracked on WB Manager. We reviewed the training records of five (5) selected operators associated with the RMP covered processes. One (1) operator was missing their Ammonia Awareness annual refresher training and HAZWOPER annual refresher training in 2022, and one (1) operator was three (3) months overdue on their HAZWOPER refresher training in 2023 **[AOC 5 - 68.71(b)].** The records for the compliance checklist for two (2) employees were missing signatures from the field safety manager **[AOC 6 - 68.71(c)]**.

40 C.F.R. § 68.73 Mechanical integrity (MI) – The EPA team reviewed the written policy ASP-Waxahachie established to maintain the ongoing integrity of the process equipment. ASP-Waxahachie uses established practices and procedures to maintain pressure vessels, piping systems, relief and vent systems, controls, pumps and compressors, and emergency shutdown systems in a safe operating condition. The basic aspects of this program include developing written procedures, performing and documenting inspections and tests, correcting identified deficiencies, and applying quality assurance measures. Inspections and tests are completed to evaluate equipment functioning as compared to that intended, and to verify that equipment is within acceptable limits (e.g., adequate wall thickness for pressure vessels). The Mechanical Integrity Policy states it uses WB manager. However, this system is no longer used for tracking **[AOC 7 - 68.73(b)]**.

40 C.F.R. § 68.75 Management of change (MOC) – The EPA team reviewed the ASP Management of Change Policy. ASP-Waxahachie uses Intelex to manage and track the status of changes to processes. This system requires that changes to items such as process equipment, chemicals, technology (including process operating conditions), procedures, and other facility changes be properly reviewed and authorized before being implemented. The MOC Policy states that changes are reviewed to ensure that adequate controls are in place to manage any new hazards and verify that existing controls have not been compromised by the change. Affected chemical hazard information, process technology information, and equipment information, as well as procedures are updated to incorporate these changes. ASP-Waxahachie also provided a list of MOCs completed in the last three (3) years. The EPA team reviewed ten (10) MOCs on this list. Four (4) MOCs – 7632, 7993, 8610, and 9240, were found to be related to the same process change regarding the update of the inoperable Honeywell Ammonia and Amine sensors. The MOC Policy states that if it is discovered that the change authorized by the MOC is incorrect or requires adjustment, a new MOC will be created and describe the complete revised scope. The original MOC shall be closed as is and reference the new MOC, while the new MOC shall reference the original MOC. MOC 9420 referenced MOC 8610. However, MOC 8610 failed to reference MOC 7993, and MOC 7993 failed to implement MOC 7632 **[AOC 8 – 68.75(a)]**.

40 C.F.R. § 68.77 Pre-startup safety review (PSSR) – The EPA team reviewed ASP-Waxahachie selected pre-startup safety reviews for the associated MOCs as well as The Pre-Startup Safety Review Policy for ASP-Waxahachie. The PSSR Policy states that safety features, procedures, personnel, and the equipment are appropriately prepared for startup prior to placing the equipment into service. The PSSR Policy requires a team leader to be responsible for the completion of the PSSR form and to determine which PSSR checklists are applicable for the change completed. ASP-Waxahachie uses Intelex to track MOCs and includes screening questions to identify if a PSSR is required.

40 C.F.R. § 68.79 Compliance Audits – The EPA team reviewed ASP-Waxahachie's most recent compliance audits, conducted in 2022 and 2025. Both compliance audits provided were conducted by at least one person knowledgeable in the process. ASP-Waxahachie assigns audit findings to the appropriate department responsible for implementing the change. Airgas failed to provide the certification for the 2022 and 2025 compliance audits. In addition, the Compliance policy for Airgas references a form no longer in use for tracking by the facility **[AOC 9 – 68.79(a)]**. ASP-Waxahachie provided a certification for the 2025 compliance audit after the inspection on April 17, 2025. In addition, we reviewed the findings and recommendations to the compliance audits provided during the inspection. The facility transitioned from tracking the compliance audit findings on WB Manager in 2022 to tracking their compliance audit findings on Intelex. ASP-Waxahachie had a total of seven (7) corrective actions in their 2022 compliance audit, and a total of two (2) action items in their 2025 compliance audit. ASP-Waxahachie failed to promptly determine and document the completion date for finding 2.13 of the 2022 compliance audit and finding 11.1 from the 2022 compliance audit was listed as one of the Action Plan items in the 2025 compliance audit **[AOC 10 – 68.79(d)].**

40 C.F.R. § 68.81 Incident investigation – ASP-Waxahachie provided a list of all incident investigations that have occurred at the facility, none of which were within the last five (5) years. ASP-Waxahachie has an incident management standard work practice procedure for both near-miss and incident reporting. ASP-Waxahachie defines an incident which, whatever its actual consequences, could have led to serious injuries, an occupational disease or to a fatality as a Potentially Serious Safety Incident (PSSI). ASP-Waxahachie investigated each incident that resulted in, or could reasonably have resulted in, a catastrophic release of a regulated substance. Of those reviewed, the incident investigation team consisted of at least one (1) person knowledgeable in the process involved.

40 C.F.R. § 68.83 Employee participation – The EPA team reviewed the ASP-Waxahachie policy regarding the implementation of the employee participation required by this section, which is integrated into the program elements. ASP-Waxahachie's 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. ASP-Waxahachie holds monthly safety meeting presentations to discuss the safety topic of the month, the SOPs to review for that month, a discussion on near misses, good catches, any attachments, handouts, and visual aids used, as well as safety feedback. The EPA team also reviewed the safety meeting agendas and sign in sheets for January-December 2024.

40 C.F.R. § 68.85 Hot Work Permit – ASP-Waxahachie's hot work policy requires that detailed permitting takes place before, during, and after any job that has the potential to provide a source of ignition. The facility implements other work permits as necessary to assure safe work conditions are communicated to maintenance and contract personnel.

The EPA team reviewed hot work permits for 2023 and 2024 and the corresponding Hot Work Policy. The facility developed and implemented a policy for any work that involves welding, cutting, and brazing in areas where flammable liquids or gases may be present or could produce a source of ignition. This policy is applicable to all ASP-Waxahachie employees and contractors, and it outlines the responsibilities of the operation's workers, supervisors, fire watch, and superintendents. The policy delineates the different types of hot work permits, pre-requisites and policy for conducting hot work, and duties of the fire watch. One (1) of the HWPs including hot work failed to include the team leader performing the work, as well as the fire watch written on the permit **[AOC 11 – 68.85(b)].**

40 C.F.R. § 68.87 Contractors – ASP-Waxahachie uses contractors to monitor alarm sensors and personnel monitor. They are also used to perform hazardous work, including hot work. The facility has procedures in place to ensure that contractors perform their work in a safe manner and are aware of the procedures to take during an emergency. This is accomplished by providing contractors with a process overview, information about safety and health hazards, emergency response plan requirements, and safe work practices in a pre-work meeting. Following the pre-work meeting, ASP-Waxahachie compiles a documentation to confirm they have received the Statement of Policy and have provided the necessary information to complete their contracted work. ASP-Waxahachie performs random evaluations of contractors using their Contractor Performance Evaluation Form.

Subpart E – Emergency Response

40 C.F.R. § 68.90 Applicability – ASP-Waxahachie is designated as a non-responding stationary source in case of an accidental release of a regulated substance; therefore, the facility shall comply with the requirements of 40 C.F.R. § 68.93 and 40 C.F.R. § 68.96.

40 C.F.R. § 68.93 Emergency response coordination activities – ASP-Waxahachie coordinated response needs with local emergency planning and response organizations for 2022 & 2024**.** ASP-Waxahachie compiled and sent their Tier II emergency to the Waxahachie Fire Department and Ellis County.

40 C.F.R. § 68.96 Emergency response exercises – As part of coordination with local emergency response officials required by §68.93, ASP-Waxahachie provided EPA with documentation of an emergency response exercise completed with officials to establish an appropriate frequency for field exercises.

Subpart G – Risk Management Plan

40 C.F.R. § 68.150 Submission – ASP-Waxahachie submitted their 5-year update to their RMP on June 13, 2024. The re-submission was within the 5-year timeframe as required by 40 C.F.R. § 68.150.

40 C.F.R. § 68.160 Registration – ASP-Waxahachie included in their RMP all regulated substances present at the site above their designated threshold quantity as required by 40 C.F.R. § 68.160.

40 C.F.R. § 68.190 Updates – ASP-Waxahachie's RMP submittal was on July 13, 2023, and the previous submittal for this facility was on July 13, 2023.

SECTION III - AREAS OF CONCERN

AOC 1 – 40 C.F.R § 68.65 (d)(1)(i) Process safety information.
(d) Information pertaining to the equipment in the process. (1) Information pertaining to the equipment in the process shall include: (ii) Piping and instrument diagrams (P&ID's).

ASP-Waxahachie failed to document the signatures of the P&ID's pertaining to the processes onsite. The EPA team reviewed seven (7) P&IDs related to the ammonia and amine process. Six (6) P&IDs reviewed were missing signatures for who they had been drawn by, designed by, checked by, and approved by, identifying the members involved in the design of the process. See Table 1 and Appendix 2.

AOC 2 – 40 C.F.R § § 68.67(e) Process hazard analysis.
(e) The owner or operator shall establish a system to promptly address the 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.

ASP Waxahachie failed to assure that their recommendations were resolved in a timely manner. The 2023 PHA had four (4) recommendations with four (4) Action Plans to address the recommendations. We reviewed the four (4) Action Plans and found action items 100598 and 100607, had completion dates after their due date and 100599 action item was still open as of April 3, 2025. Action item 100598 was also marked as a recommendation on the 2018 Process Hazard Analysis. ASP-Waxahachie provided documentation on April 18, 2025, marking action item 100599 was completed on April 10, 2025. See Appendices 3 and 4.

AOC 3 – 40 C.F.R. § 68.69(a) Operating procedures.
(a) The owner or operator shall develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information and shall address at least the following elements.

ASP failed to develop and implement written operating procedures that provide clear instructions. The EPA team reviewed 14 standard operating procedures ("SOPs") relating to the two processes onsite. Operating Multiple operating procedures provided general verbiage, used undefined acronyms, and included steps that were unclear. SOP A-01 Anhydrous Ammonia Cylinder filling. Page 1 Hazard "gasket" is "in good shape" but does not define what "good shape" means. SOP A-04 Loading Anhydrous ammonia Cargo Truck Using Pump or Compressor. Line 13 states to "… reverse the compressor" but does not explain how to "reverse" the compressor. Lines are numbered incorrectly, missing #14 and 16. SOP A-27 Pump-Out of Ammonia Storage Tank & Vapor Removal repeats line numbers #6 and 7. See Appendix 5.

AOC 4 – 40 C.F.R § 68.69(d) Operating procedures.
(d) The owner or operator shall develop and implement safe work practices to provide for the control of hazards during operations such as lockout/tagout.

ASP-Waxahachie failed to develop and implement safe work practices to provide for the control of hazards during operations such as lockout/tagout. During the facility tour, we observed one (1) lockout tag without a lock, which was removed on the tour, and one (1) lockout with a tag that was not filled out. The EPA team reviewed Hazardous Work Permits pertaining to LOTO and found on multiple HWPs, Section 1 does not indicate LOTO but addresses LOTO in Section 2. See Table 2 and Appendix 6. (LOTO SOP and 2 HWPs)

AOC 5 – 40 C.F.R § 68.71(b) Training – Refresher training.
(b) Refresher training shall be provided at least 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. The owner or operator, in consultation with the employees involved in operating the process, shall determine the appropriate frequency of refresher training.

ASP-Waxahachie failed to provide refresher training at least every three (3) years. The EPA team reviewed the training records for five (5) operators involved in the process. The training requires annual refresher training for ammonia awareness, amine awareness, and HAZWOPER. One (1) operator was missing their Ammonia Awareness annual refresher training and HAZWOPER annual refresher training in 2022, and one (1) operator was three (3) months overdue on their HAZWOPER refresher training in 2023. See Appendix 7.

AOC 6 – § 68.71(c) Training – Training documentation.
(c) The owner or operator shall ascertain that each employee involved in operating a process has received and understood the training required by this paragraph. The owner or operator shall prepare a record which contains the identity of the employee, the date of training, and the means used to verify that the employee understood the training.

ASP-Waxahachie failed to verify that the employee understood the training. EPA reviewed the training records for five (5) operators involved in the process. The records for the compliance checklist for two (2) employees were missing signatures. See Appendix 7.

AOC 7 – 40 C.F.R § 68.73(b) Mechanical Integrity.
(b) The owner or operator shall establish and implement written procedures to maintain the on-going integrity of process equipment.

ASP-Waxahachie failed to implement their written procedures to maintain the on-going integrity of process equipment. The EPA team reviewed ASP-Waxahachie's Mechanical Integrity Policy-8.0. The policy made references to using WB Manager for tracking, but it is no longer used and has since transitioned to Intelex to track overdue inspections and the software Power BI to track critical safeguards. See Appendix 8.

AOC 8 – 40 C.F.R § 68.75(a) Management of Change.

(a) The owner or operator shall establish and implement written procedures to manage changes (except for "replacements in kind") to process chemicals, technology, equipment, and procedures; and, changes to stationary sources that affect a covered process.

ASP-Waxahachie failed to implement the MOC policy on four (4) MOCs -7632, 7993, 8610, and 9240. The MOC policy states that if it is discovered that the change authorized by the MOC is incorrect or requires adjustment, a new MOC will be created and describe the complete revised scope. The original MOC shall be closed as is and reference the new MOC, while the new MOC shall reference the original MOC. MOC 7632 was replaced by MOC 7993, which was replaced by MOC 8610, and MOC 8610 was replaced by MOC 9240. MOC 9240 referenced replacing MOC 8610. However, MOC 8610 failed to reference MOC 7993, and MOC 7993 failed to implement MOC 7632. See Appendices 9 and 10.

AOC 9 – 40 C.F.R § 68.79(a) Compliance Audits.
(a) The owner or operator shall certify that they have evaluated compliance with the provisions of this subpart, at least every three years to verify that the procedures and practices developed under this subpart are adequate and are being followed.

ASP-Waxahachie failed to provide the certifications for 2025 and 2022. On April 18, 2025, ASP-Waxahachie provided a certification for the 2025 Compliance Audit signed on April 17, 2025. ASP-Waxahachie also failed to verify that the procedures and practices developed are adequate. The Compliance Audit Policy mentions Form 13.1, which is no longer in use, instead of the newer Intelex system ASP-Waxahachie uses to track findings. See Appendix 11.

AOC 10- 40 C.F.R § 68.79 Compliance Audits. *(d) owner or operator shall promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected.*

ASP-Waxahachie failed to promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected. The EPA team reviewed the two most recent compliance audits. We were unable to track completion dates for 2022 finding 2.13, in WB manager, and finding 8.1 from the 2022 compliance audit was a repeat finding included in the 2025 compliance audit. See Appendix 12.

AOC 11- 40 C.F.R § 68.85 Hot Work Permits. *(b) The permit shall document that the fire prevention and protection requirements in 29 CFR 1910.252(a) have been implemented prior to beginning the hot work operations; it shall indicate the date(s) authorized for hot work; and identify the object on which hot work is to be performed.*

The EPA team reviewed the Hot Work and Hazardous Work Permits for ASP-Waxahachie issued in 2023 and 2024. Hazardous Work Permit 184419 was for Hot Work performed in the facility. The Team leader performing the work was not identified, nor was the fire watch for this permit. See Appendix 6.

Section IV – FOLLOW UP
I requested supplemental documentation be downloaded to the EPA designated SharePoint site for review in which the facility provided on April 18, 2025.

The Clean Air Act 42 U.S.C. Section 114(a)(2)(A) / Clean Air Act 42 U.S.C. Section 114(a)(2)(B)" CAA 42 U.S.C. Section 114(a)(2)(A) grants a representative authorized by the Administrator, upon presentation *of credentials, the right of entry to, upon, or through any premises of such person on in which any records required to be maintained are located. Under CAA U.S.C. Section 114(a)(2)(B) the authorized representative may at reasonable times have access to and copy any records, inspect any equipment or method and sample any emission required to be sampled under CAA 42 U.S.C 7414(a)(1)."*

Section V – LIST OF APPENDICES

The Appendices are not included in the online published inspection report. CBI Appendices include documents that are claimed CBI by the facility. Sensitive Appendices may include appendices that will not be posted but are not explicitly CBI. These could include Personally Identifiable Information (PII) or Homeland Security sensitive information.

- **Appendix 1:** Opening and closing conference sign-in sheets
- **Appendix 2:** P&IDs ASP-SP36-F1, ASP-SP36-F2, ASP-SP36-F3, ASP-SP36-F12, ASP-9731-F13, ASP-SP36-F14
- **Appendix 3**: 2018 PHA and recommendations
- **Appendix 4**: 2023 PHA and recommendations
- **Appendix 5:** SOPs A-01, A-04, A-27
- **Appendix 6:** LOTO Policy and HWPs
- **Appendix 7:** Operator Training Records
- **Appendix 8:** Mechanical Integrity Policy-8.0
- **Appendix 9:** MOC Policy 2-SAFECOR-IMS-020
- **Appendix 10:** MOCs 7632, 7993, 8610, and 9240
- **Appendix 11:** Compliance Audit Policy 13.0 and 2025 Certification Signature
- **Appendix 12:** 2022 Compliance Audit