

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	September 23 - 25, 2025	
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 Prevention Provisions – Risk Management Program (RMP)	
Company Name:	Seatex - Pasadena	
Facility Name:	Seatex - Pasadena	
Facility Physical Location:	9730 Bay Area Blvd.	
(city, state, zip code)	Pasadena, Texas 77507	
Mailing address:	(same as above)	
(city, state, zip code)	(same as above)	
County/Parish:	Harris County	
Facility Phone Number	(281)-291-9966	
Facility Contact:	Bill Van Horn	EHS&S Director
	bvanhorn@seatexgroup.com	
FRS Number:	110060259704	
Identification/Permit Number:	N/A	
Media Identifier Number:	100000232562	
NAICS:	325998 – All Other Miscellaneous Chemical Product and Preparation Manufacturing	
SIC:	N/A	
Personnel participating in inspection:		
Charese Simpson	EPA Region 6	Lead Inspector
Sherronda Phelps	EPA Region 6	Sr. Inspector
Bill Van Horn	Seatex	EHS&S Director
EPA Lead Inspector Signature/Date	<i>Charese Simpson</i> Charese Simpson	1.26.2026 Date
Supervisor Signature/Date	Kayla Buchanan	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

I, United States Environmental Protection Agency (EPA) Region 6 Inspector, Charese Simpson, arrived at the Seatex - Pasadena (Seatex) facility at 9:00 AM on Tuesday, September 23, 2025, for an announced inspection. I met with Bill Van Horn (EHS&S Director) for an opening meeting [**Appendix 1**]. I presented my credentials and informed Mr. Van Horn that this was an EPA inspection to determine compliance with the federal Chemical Accident Prevention Program. The scope of the inspection was a partial compliance evaluation (PCE), which included an evaluation of the facility's compliance with the Clean Air Act (CAA) Section 112(r)(1) & (7), the General Duty Clause and the Chemical Accident Prevention Provisions in 40 C.F.R. Part 68. Seatex's Risk Management Plan (RMP) lists the facility as a Program Level Three (3) facility. I inquired if an employee representative was available pursuant to Section 112(r)(6)(L) of the CAA to participate in this inspection and was informed that Seatex is a non-union facility.

FACILITY DESCRIPTION

Seatex is located at 9730 Bay Area Blvd Pasadena, Texas, 77507 in Harris County. Seatex operates a batch chemical blending and manufacturing facility that includes processes that utilize ammonia and formaldehyde. The ammonia is stored in storage tanks, drums, totes and tank trucks. The formaldehyde is stored in storage tanks. Seatex's regulated process includes two Program Level 3 RMP-Covered Processes: Anhydrous and Aqueous Ammonia Production System and Formaldehyde. The facility handles two regulated, toxic chemicals under the Risk Management Program: Anhydrous Ammonia and Ammonia (conc 20% or greater). Seatex has approximately 10 full-time employees that work at the site.

Section II – OBSERVATIONS

On Wednesday, September 24, 2025, I was accompanied by Bill Van Horn, Mark Keller, and Todd Wilson to conduct a tour of the site, specifically of the Ammonia Distribution area. While on the tour, I observed the covered process, emergency equipment, and other process equipment. Seatex's employees can access standard operating procedures (SOPs) electronically. In addition, the facility obtains updated, hard copies of SOPs to access in case of a power outage or emergency. Prior to the tour, I was provided with piping and instrumentation diagrams (P&IDs) and a block flow diagram of the process unit that assisted in the tour.

Subpart A – General

40 C.F.R. § 68.10 Applicability – Seatex 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 – I reviewed Seatex’s RMP registration submitted on March 20, 2023. It listed the toxic chemicals for its Program 3 processes.

40 C.F.R. § 68.15 Management – Seatex developed a management system to oversee the implementation of risk management program elements, documented the positions responsible for implementing the individual requirements of the risk management program, and defined the lines of authority using its RMP Management Organizational Chart.

Subpart B – Hazard Assessment

40 C.F.R. § 68.20 Applicability – Seatex has two Program Level 3 processes subject to this subpart. Seatex is required to prepare an off-site consequence analysis and complete the five-year accident history.

40 C.F.R. § 68.22 Off-Site Consequence Analysis Parameters – Seatex used parameters required in this part to calculate toxic worst-case and alternative release scenarios. Seatex 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 – During the inspection, I reviewed documentation from Seatex regarding the worst-case release scenario analysis for their toxic process. This analysis used RMP*Comp™ which is a dispersion modeling suite that includes toxic dispersion, fire, and explosion models. Seatex analyzed and reported in the RMP their worst-case release scenario, estimated to create the greatest distance to endpoint, and resulting from an accidental release of a regulated toxic substance from a covered process under worst-case conditions. Based upon the criteria for determining a worst-case event, anhydrous ammonia was selected as having the worst release potential.

40 C.F.R. § 68.28 Alternative Release Scenario Analysis – Seatex identified and documented the alternative release scenario to represent all toxic substances held in a covered process, using a scenario that is likely to occur. Anhydrous ammonia is at most risk, or more likely to be released during transfer between storage vessels and delivery trucks. Therefore, a transfer hose failure is the most likely release scenario for anhydrous ammonia. Excess flow valves are intended to mitigate the flow upon hose failure. Seatex utilizes RMP*Comp™ and Marplot. They maintain aerial photos showing the alternative release scenario endpoint distance radius and a circle centered on the approximate location of the unit that is considered in the alternative release scenario; therefore, meeting the requirements of the regulation.

40 C.F.R. § 68.30 Defining Off-Site Impacts - Population – Seatex used the most current Census Bureau population data and the distances to endpoints, as specified in the regulation, to calculate the population numbers reported in their RMP.

40 C.F.R. § 68.33 Defining Off-Site Impacts - Environment – Seatex 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 – Seatex reviewed and updated the off-site consequence analyses at least once every five years, as required by this subpart.

40 C.F.R. § 68.39 Documentation – Seatex maintained records of the off-site consequence analyses, in accordance with this subpart. These records included:

- documentation of vessels or pipelines;
- substances selected for worse case and alternative release scenarios;
- documentation of estimated quantity released, release rate, and duration of release;
- methodology used to determine distance to endpoint; and,
- data used to estimate population and environmental receptors.

40 C.F.R. § 68.42 Five-year accident history – I reviewed Seatex’s five-year accident history and OSHA 300 Log of Work-Related Injuries and Illnesses logs for 2022 – 2024. I did not identify accidental releases from the covered process that resulted in one or more of the following: on-site deaths, injuries, significant property damage on-site, known off-site deaths, evacuations, sheltering in place, property damage, or environmental damage in its accident history.

Subpart D – Program 3 Prevention Program

40 C.F.R. § 68.65 Process Safety Information – Seatex compiled written process safety information, which included information pertaining to the hazards of the regulated substances used or produced by the process, information pertaining to the technology of the process, and information pertaining to the equipment in the process. Seatex provide Safety Data Sheets (SDSs) for the process chemicals as well as detailed process safety information that contained the following data for the hazards of the substances used: toxicity information, permissible exposure limits, physical data, reactivity data, corrosivity data, thermal and chemical stability data, and the hazardous effects of inadvertent mixing of materials that could foreseeably occur. I reviewed documentation concerning the technology of the process, which included a block flow diagram, process chemistry, maximum intended inventory, safe upper and lower limits for such items as: temperatures, pressures, flows or compositions, and an evaluation of the consequences of deviation for each covered process. I reviewed documentation pertaining to the equipment of the process, including materials of construction, P&IDs, electrical classification, relief system design and design basis, design codes and standards employed, material and energy balances, and safety systems.

40 C.F.R. § 68.67 Process hazard analysis (PHA) – Seatex has a comprehensive program to help ensure that hazards associated with the various processes are identified and controlled. Within this program, each covered process is systematically examined to identify hazards and ensure that adequate controls are in place to manage these hazards. Seatex primarily uses the hazard and operability (HAZOP) to perform these evaluations. The analyses are conducted using a team of people who have operating, maintenance, and engineering expertise. The PHA was performed by a team with expertise in engineering and process operations. The team included at least one employee who had experience and knowledge that was specific to the process being evaluated and one employee who was knowledgeable in the specific PHA methodology used.

I reviewed the facility's PHAs dated March 2025 for both the Ammonia and Formaldehyde Systems. In addition, I reviewed Seatex's facility siting evaluation and checklist and their human factors checklist. Both PHAs addressed the hazards of the process and included: identification of any incident that had a likely potential for catastrophic consequences; engineering and administrative controls applicable to hazards and their interrelationships; human factors; and an evaluation of a range of the possible safety and health effects of failed controls.

Seatex currently utilizes Chempax, a third-party software system, to track and promptly address the PHA 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. During the inspection, I reviewed the facility's tracking system that contained actions items from their PHAs. I also followed up to ensure the actions were officially closed through the facility's management of change process. All action items are currently closed in the system.

40 C.F.R. § 68.69 Operating Procedures – Seatex developed and implemented written operating procedures that provide instructions or steps for conducting activities associated with each covered process, consistent with the safety information. The SOPs I reviewed addressed: the steps for each operating phase (initial and normal startup, normal operations, temporary operations, emergency operation and shutdown, normal shutdown, and startup following a turnaround or after emergency shutdown); the consequences of deviation and mechanisms to correct and/or avoid deviation; safety and health considerations; the properties of, and hazards presented by, chemicals used in the process; the precautions necessary to prevent exposure; quality control for raw materials; and, the safety systems and their functions. Operating procedures are accessible to process operators, and other employees, electronically. In addition, hard copies of SOPs are kept in the control room and are updated whenever a change is made. During the inspection, I reviewed Seatex's safe work procedures, including lock out/tag out procedures and confined space entry procedures. The company utilizes safe work permits, which are required prior to any contractor entering a confined space. Seatex is required to

annually certify that operating procedures are current and accurate. I requested Seatex's operating procedure certifications. The facility failed to certify annually that their operating procedures are current and accurate for the following SOPs, but are not limited to: Cooking 29% Ammonia to the 29 tank (AMM-1008), What if Scenarios Procedure Ammonia (AMM-1024), Missionscav 6045 and 6050 (PRO-2059), Ammonia Unit Shutdown Procedure (AMM-1002), and Ammonia Unit Start-up Procedure (AMM-1027). **[Appendix 2] [AOC #1 - 40 C.F.R. § 68.69(c)]**

40 C.F.R. § 68.71 Training – I reviewed Seatex's training program procedure and employee training records. The facility's training program ensured that each employee presently operating the covered process, and each employee newly assigned to a covered process are trained or tested to qualify as competent in an overview of the process and in the operating procedures that pertain to their duties. In addition, Seatex operator(s) must go through a training program, which includes the following: on-the-job training, a testing process that is written and computer-based, and a series of field demonstration tests. I reviewed several individuals' training documents. Seatex is required to provide refresher training 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. I requested documentation to ensure that operators understood the training. Seatex provided sufficient documentation for the means of verification that the operators understood the training.

40 C.F.R. § 68.73 Mechanical Integrity – I reviewed the written procedures Seatex established to maintain the ongoing integrity of its process equipment. I spoke with Mr. Van Horn who explained the facility's mechanical integrity program and procedures. I reviewed the facility's inspection records for several tanks, piping circuits, safety valves, and other RMP covered equipment. Seatex utilizes appropriate equipment surveillance and preventative maintenance activities for the process equipment. The facility uses a third-party contractor to maintain and conduct inspections on equipment. During the inspection, Seatex provided training records of personnel who are American Petroleum Institute (API) certified. In addition, I requested overdue inspection or testing on RMP equipment. Two Aqua Ammonia Tanks, AT-41 and AT-44, are currently overdue for ultrasonic testing (UT) inspections, which are to be completed every 5 years according to API 510. The last date of the UT was conducted on 7/9/2020. In addition, there were 2 safety valves that failed to be tested every 3 years: ¾ Kunkle 916BFEB01AME (Last tested: 3/23/21), 1" 910BFEM01-PE (Last tested: 7/7/16), 1" Kunkle 910BFEM01-NE (Last Tested: 4/8/21), and 1" Kunkle 910BFE-01 (Last Tested: 4/14/21). ¾ Kunkle 916BFEB01AME (Last tested: 3/23/21) & 1" 910BFEM01-PE (Last tested: 7/7/16) **[Appendix 3] [AOC #2 68.73(d)(1)]**. In addition, Seatex failed to perform internal inspections on their process equipment, specifically their Aqua Ammonia Tanks (AT-41, AT-42, and AT-44). Seatex relies solely on UT measurements in lieu of performing required internal inspections on process vessels/tanks. I requested documentation or justification for the facility to have UT-only inspections in lieu of internal inspections. The facility could not produce documentation demonstrating that UT-only inspections provide equivalent information to internal inspections, nor did they provide an RBI assessment supporting the deferral of internal inspections which is typically every 10 years or half remaining life according to API 510. Therefore, the

facility is not fully implementing its mechanical integrity program in accordance with RAGAGEP [Appendix 4] [AOC #3 68.73(d)(2)].

40 C.F.R. § 68.75 Management of Change (MOC) – I reviewed Seatex’s MOC procedure. The written MOC procedure assured the facility managed changes to process chemicals, technology, equipment, procedures, and changes to stationary sources that effect a covered process. The procedure assured that the following considerations were addressed prior to any change: technical basis for change, impact of change on safety and health, modifications to operating procedures, necessary time period for the change, and authorization requirements for a proposed change. I reviewed a sample of MOCs. I followed through to ensure each MOC was followed through to completion in their database which houses and tracks any MOCs at the facility. I observed no areas of concern within this element at the time of the inspection.

40 C.F.R. § 68.77 Pre-startup Safety Review (PSSR) – I requested Seatex’s pre-startup safety reviews for any associated MOCs. There were no PSSRs available to review at the time of the inspection. After implementation of an MOC, the MOC Initiator shall attach all relevant documentation to the MOC record. This could include, but is not limited to, ‘as-built’ P&IDs, red-lined SOPs, training documentation and the completed PSSR.

40 C.F.R. § 68.79 Compliance Audits – Seatex provided their two most recent certified RMP Compliance Audits for their Ammonia and Formaldehyde Processes. PHAs for both units were conducted on October 21, 2020, and March 7, 2023. Both compliance audits were conducted by at least one person knowledgeable in the process. The audit team consists of Seatex’s employees and resources not residing at the facility. When conducting its RMP compliance audits, Seatex uses procedural reviews, interviews, field verifications, and a representative sampling of records which provided insight into the adequacy of the design and implementation of the program relative to the requirements of EPA’s RMP rule and OSHA PSM standards. Seatex also provided their compliance audit certifications during the inspection.

40 C.F.R. § 68.81 Incident Investigation – Seatex provided a list of all incident investigations that occurred within the past five years. Of those reviewed, the incident investigation team consisted of at least one person knowledgeable in the process involved. Seatex has an incident management standard work practice procedure for both near-miss and incident reporting. Seatex did not have any RMP related incidents that could have resulted in, or could reasonably have resulted in, a catastrophic release of a regulated substance.

40 C.F.R. § 68.83 Employee Participation – Seatex developed a written plan of action regarding the implementation of the employee participation required by this section, which is integrated into the program elements. Seatex 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.

40 C.F.R. § 68.85 Hot Work Permit – Seatex provided their hot work and safe work procedure that detailed guidance for hot work/safe work activities at the site. The facility discussed the process for conducting hot work onsite. I requested and reviewed a sample of hot work permits. There were no areas of concern noted from the review and follow up on implementation of hot work permits.

40 C.F.R. § 68.87 Contractors – I reviewed Seatex’s contractor procedure. Seatex evaluates contractors through their contractor packet. The packet consists of pre-qualification forms, evaluations, and screening questions to appropriately select the contractor. Their system requires each contractor to be evaluated based on the risk category of their work. All contractors that will perform work at the facility shall receive and maintain the following training prior to work: OSHA Training, Houston Area Safety Council Training, Unit Specific Training, and Contractor Specific Training. Contractors are also informed of known potential hazards, provisions of the Emergency Action Plan (EAP), and health and safety procedures through the work permit procedure. The facility implements safe work practices consistent with 40 C.F.R. § 68.69(d), to control the entrance and exit of the contract employees via the security gate.

Subpart E – Emergency Response

40 C.F.R. § 68.90 Applicability – Seatex is designated as a “non-responding” stationary source in case of an accidental release of a regulated substance; therefore, the facility need not comply with the requirements of 40 C.F.R. § 68.95.

40 C.F.R. § 68.93 Emergency Response Coordination Activities – I reviewed Seatex’s Emergency Action Plan (EAP). The EAP indicates that it is intended to provide a standard for preparing for a fire, explosion and chemical release to ensure the safety of associates. I requested coordination documentation with the local fire department and other local emergency planning and response organizations. Seatex provided documentation of coordination with local authorities that included the names of the individuals involved, their contact information, and the nature of the coordination for the recent coordination activities that took place.

40 C.F.R. § 68.96 Emergency Response Exercises – As part of coordination with local emergency response officials, required by §68.93, Seatex consulted with officials to establish an appropriate frequency for field exercises. Exercises are performed, at a minimum, annually. Exercise-specific objectives are used to establish the exercise scope, specify the emergency response functions to be demonstrated.

Section III – AREAS OF CONCERN

AOC 1 – Standard Operating Procedure – 40 C.F.R. § 68.69(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.

The facility failed to certify annually that their operating procedures are current and accurate for the following SOPs, but are not limited to: Cooking 29% Ammonia to the 29 tank (AMM-1008), What if Scenarios Procedure Ammonia (AMM-1024), Missionscav 6045 and 6050 (PRO-2059), Ammonia Unit Shutdown Procedure (AMM-1002), and Ammonia Unit Start-up Procedure (AMM-1027).

AOC 2 – Mechanical Integrity – 40 C.F.R. § 68.73(d)(1) Inspection and testing. (1) Inspections and tests shall be performed on process equipment.

Seatex failed to perform UT inspections on two Aqua Ammonia Tanks (AT-41 and AT-44) which are to be completed every 5 years according to API standards. The last date of the UT was conducted on 7/9/2020. In addition, there were 2 safety valves that failed to be tested and certified every 3 years: ¾ Kunkle 916BFEB01AME (Last tested: 3/23/21), 1" 910BFEM01-PE (Last tested: 7/7/16), 1" Kunkle 910BFEM01-NE (Last Tested: 4/8/21), and 1" Kunkle 910BFE-01 (Last Tested: 4/14/21). ¾ Kunkle 916BFEB01AME (Last tested: 3/23/21) & 1" 910BFEM01-PE (Last tested: 7/7/16). Seatex also failed to perform internal inspections on their process equipment, specifically their Aqua Ammonia Tanks (AT-41, AT-42, and AT-44).

AOC 3 – Mechanical Integrity – 40 C.F.R. § 68.73(d)(2) Inspection and testing. (2) Inspection and testing procedures shall follow recognized and generally accepted good engineering practices.

Seatex failed to produce documentation demonstrating that UT-only inspections provide equivalent information to internal inspections, nor did they provide an RBI assessment supporting the deferral of internal inspections specifically for Aqua Ammonia Tanks (AT-41, AT-42, and AT-44). Seatex relies solely on UT measurements in lieu of performing required internal inspections on process vessels/tanks. Internal inspections are to be performed every 10 years or remaining half life, according to API 510. Therefore, the facility is not fully implementing its mechanical integrity program procedures in accordance with RAGAGEP.

Closing Conference

EPA Region 6 inspectors, Charese Simpson and Sherronda Phelps (we), conducted a closing conference at Seatex on September 25, 2025. During the closing conference, we reviewed the areas of concern noted above. There were fielded questions from Seatex's personnel, and we provided information about the next steps in the inspection process.

Section IV – FOLLOW UP

No additional documentation was received by EPA after the inspection.

Section V – LIST OF APPENDICES (Confidential Business Information (CBI) appendices are not included in published version of the report)

- Appendix 1 – Opening/Closing Sign-in Sheet
- Appendix 2 – SOPs
- Appendix 3 – UT Exam Reports
- Appendix 4 – Mechanical Integrity Procedure (MI-36)