

**US EPA REGION 6
CLEAN AIR ACT SECTION 112(r)
INSPECTION REPORT**

Stationary Source	Chalmette Refining, L.L.C. PBF Holding Company LLC	
Dates of Inspection	December 2-5, 2024	
USEPA Contact	Aimee Boss, U.S. EPA Region 6	
Description of Activities	Inspection included the following activities: • Opening conference with facility representatives • On-site document review • Field verification of piping and instrumentation diagrams (P&IDs) and other field observations • Personnel interviews • Closing meeting with facility representatives	
Inspection Participants	Eastern Research Group, Inc. (ERG) • Anthony Gaglione • Liam Prendergast Louisiana Department of Environmental Quality • Christopher Smith	
Facility Participants	Katherine Orgeron, HSE Manager	
	Grady Thigpen, PSM Manager	
	Sara Valentine, Refinery Attorney	
	Peter Whitfield, Outside Counsel	
	See Attachment 1 for all facility participants	
EPA Lead Inspector Signature/Date		
	Anthony Gaglione, ERG	Date
EPA Section Supervisor Signature/Date		
	Kayla Buchanan	Date

STATIONARY SOURCE INFORMATION

USEPA Facility ID #	1000 0009 3515
Most Recent RMP Submission	September 28, 2023
Facility Location	500 West Saint Bernard Highway Chalmette, Louisiana 70044
Latitude / Longitude	29.933333, -89.971667
Number of Employees	598 Chalmette Refining LLC facility employees and 470 day-shift contractors.
Description of Surrounding Area	The facility is in a mixed-use urban and industrial area.

FACILITY/PROCESS DESCRIPTION

The Chalmette Refining, L.L.C. refinery (the Facility), located in Chalmette, Louisiana, was founded in 1915 as part of the Pelican Oil Company. The Facility was sold by the Pelican Oil company in 1923 and then transferred ownership an additional seven times until 1999, when it was owned by a joint venture of ExxonMobil and Petroleos de Venezuela, S.A. (PDVSA). PBF Energy, Inc. purchased 100 percent of the Facility in 2015.^{1,2} The Facility employs approximately 598 full-time Facility employees and approximately 470 day-shift contractors during normal operations (and approximately 760 day-shift contractors during turnarounds). The refinery operates 24 hours per day, 7 days per week and follows a four-crew (and one relief shift), 12-hour shift schedule (with shift changes at 4:00 am and 4:00 pm) for operations personnel. Operations personnel are represented by the United Steelworkers (USW) union.

The Facility has a rated crude oil refining capacity of 197,000 barrels per stream day (bpsd)³. The Facility has two crude units: The #1 Crude Unit refines sweet crude grades and the #2 Crude Unit refines foreign sour crude grades. The Facility's products include gasoline, ultra-low sulfur diesel (ULSD), light cycle oil, fuel oil, asphalt, lubricants, aromatics, propylene, ethylene, propane, butane, sulfur, and petroleum coke.

The Chalmette Refining, L.L.C. refinery also produces renewable diesel fuel from feedstocks such as soybean oil, distillers corn oil, and other biogenic fats and oils. The renewable diesel processes were constructed in 2022 (Bates CHLM_01_00009386), and a renewable diesel Program 3 covered process was included by the Facility in a new Risk Management Plan

¹ Chalmette Refining, L.L.C.; *Re: Response to Information Request*; Received by U.S. Environmental Protection Agency, Region 6; November 18, 2024.

² *ExxonMobil Sells Share of Chalmette Refining, LLC In Louisiana*; Exxon Mobil Corporation; June 18, 2015; <https://ir.exxonmobil.com/news-releases/news-release-details/exxonmobil-sells-share-chalmette-refining-llc-louisiana> (accessed January 2, 2025).

³ *Refinery Capacity: Refinery capacity data by individual refinery as of January 1, 2024*; U.S. Energy Information Administration (EIA); Released June 14, 2024; <https://www.eia.gov/petroleum/data.php> (accessed September 6, 2024).

submitted on April 23, 2023. The facility name associated with that submission is St. Bernard Renewables, LLC, and the parent company is PBF Energy Company, LLC.⁴

The Facility reported seventeen (17) Risk Management Program covered processes in its most recent risk management plan (RMP) submission dated September 28, 2023, summarized in Table 1 below.⁵ All seventeen (17) of the covered processes are Program Level 3. The Facility's flare system includes one flare gas recovery (FGR) system and two flare stacks: One candelabra flare and one continuous pencil flare.

Table 1. Facility RMP Covered Processes

Process ID	Program Level	Chemical	Category
1000133600	3	Flammable Mixture	Flammable
1000133601	3	Flammable Mixture	Flammable
1000133602	3	Flammable Mixture	Flammable
1000133603	3	Flammable Mixture	Flammable
1000133604	3	Flammable Mixture	Flammable
1000133605	3	Flammable Mixture	Flammable
1000133606	3	Flammable Mixture	Flammable
1000133607	3	Flammable Mixture	Flammable
1000133608	3	Flammable Mixture	Flammable
1000133669	3	Flammable Mixture	Flammable
1000133670	3	Flammable Mixture	Flammable
1000133671	3	Flammable Mixture	Flammable
1000133672	3	Flammable Mixture	Flammable
1000133673	3	Hydrogen fluoride (conc 50% or greater)	Toxic
		Flammable Mixture	Flammable
1000133674	3	Flammable Mixture	Flammable
1000133675	3	Flammable Mixture	Flammable
1000133677	3	Flammable Mixture	Flammable

⁴ St. Bernard Renewables, LLC; *Risk Management Plan Submission*; EPA Facility Identifier 1000 0025 0426; Receipt Date April 23, 2023.

⁵ Chalmette Refining, LLC; *Risk Management Plan Submission*; EPA Facility Identifier 1000 0009 3515; Receipt Date September 28, 2023.

PURPOSE OF THE INSPECTION

The inspection of the Chalmette Refining, LLC refinery occurred from December 2, 2024, through December 5, 2024, and focused on the Facility's implementation of and compliance with the requirements under the Clean Air Act (CAA) § 112(r) (the Risk Management Program and the General Duty Clause). The inspection further focused on the following RMP-covered processes:

- Alkylation Unit (Alky) [RMP Process ID 1000133673]; and
- Fluidized Catalytic Cracking Unit (FCCU) [RMP Process ID 1000133675].

The EPA selected the Alky covered process as it uses hydrogen fluoride (HF), a chemical identified as a focus under the fiscal year (FY) 2024 to 2027 National Enforcement and Compliance Initiative (NECI) *Chemical Accident Risk Reduction*. The EPA selected the FCCU covered process due to a known and established history of incidents and releases that have occurred in association with FCCUs at other U.S. refineries.

In preparation for the inspection, Aimee Boss of U.S. EPA Region 6 sent an electronic notice of inspection (NOI) and request for information (RFI) to Katherine Orgeron, the Facility Health, Safety, and Environment (HSE) Manager, on September 18, 2024. The NOI announced the original date of the inspection as the week of October 7, 2024. The Facility acknowledged receipt of both the NOI and RFI on September 20, 2024. Within the confirmation email, the Facility indicated that the Alky and FCCU would be out of service due to a major turnaround scheduled to occur from September 23, 2024, through approximately mid-November 2024. The EPA Inspection team rescheduled the inspection to take place during the week of December 2, 2024. The RFI included a list of documentation that the inspection team intended to review upon their arrival at the Facility on December 2, 2024. The EPA NOI also informed the Facility of the right of employees and their representatives to participate in the inspection as provided by CAA § 112(r)(6)(L) and requested that the Facility inform employee representatives of the inspection and extend to them an invitation to participate.

OPENING CONFERENCE

The EPA Inspection Team arrived at the Facility at approximately 8:40 am CST on Monday, December 2, 2024. The EPA Inspection Team received a facility-wide safety briefing and an Alkylation Unit-specific safety briefing. The EPA Inspection Team held an opening conference with Facility representatives at approximately 9:45 am CST in a conference room in the contractor building. Inspector Gaglione initiated the opening conference by introducing the members of the inspection team and presenting credentials. Inspector Gaglione explained the purpose and scope of the inspection and proposed the schedule for the inspection and expected activities, which included interviews with personnel, a driving tour of the Facility, walkthroughs of the Alky and FCCU processes, and documentation requests. The opening conference included Facility representatives who also participated throughout the inspection. The Attendance Sheet (see Attachment 1) records all Facility representatives who were either

present at the opening conference and/or closing conference or participated in interviews during the inspection.

Inspector Gaglione and Katherine Orgeron, the Facility HSE Manager, signed the Notice of Inspection form (see Attachment 2) and the Receipt of Notice of Right to Claim Confidentiality form (see Attachment 3). The Facility made copies of the signed forms for its records and the EPA Inspection Team retained the originals.

INSPECTION OVERVIEW

Facility representatives presented an overview of refinery operations and then escorted the EPA Inspection Team on a driving tour of the Facility. Throughout the week, the EPA Inspection Team conducted interviews with Facility personnel to discuss the implementation of and compliance with the requirements under the CAA § 112(r) (the Risk Management Program and the General Duty Clause). The Attendance Sheet (see Attachment 1) tracked all personnel that participated in interviews with the EPA Inspection Team. While at the Facility, the inspection team performed a field walkdown of the Alky and FCCU covered processes on December 3, 2024.

At the end of the inspection, the EPA Inspection Team submitted a request for additional documentation on December 5, 2024, with a requested due date of January 24, 2025. Due to the 2025 Gulf Coast Blizzard (Winter Storm Enzo) in the area, EPA granted an extension for the additional documentation with a due date of January 31, 2025. The Facility provided responsive documentation on January 31, 2025. In response to the first draft of this report, the Facility provided additional documentation on February 28, 2025.

FIELD OBSERVATIONS

Facility representatives escorted the EPA Inspection Team on a driving tour of the refinery on Monday, December 2, 2024. On Tuesday, December 3, 2024, Facility representatives escorted the EPA Inspection Team on a walkthrough of the Alky and FCCU covered processes, which included field verifying P&IDs, and a walkthrough of the central control room where the inspection team spoke with console operators for the Alky and FCCU processes. The Alky Unit walkthrough began with a walkthrough along the perimeter of the unit. Then, the EPA Inspection Team entered the Alky Unit change house to don HF-specific PPE and entered the Alky Unit inside of the HF safety perimeter. During the walkthrough of these two covered processes, the EPA Inspection Team took a total of 27 photographs of process equipment. The photographs and photograph log are provided in Attachment 4. Observations made during the walkthroughs include:

- FCCU observations:
 - The P&ID of spent catalyst slide valve (SCSV) 78HV105 identified 4-inch piping that discharges to atmosphere (line number 78-688-A1-4"—(F)) located immediately upstream of SCSV 78HV105 (drawing number 10091500-78A-1216, revision 5; Bates CHLM_01_00005019). The P&ID identified a blind installed on this piping on the

downstream side of the second 4-inch valve from the spent catalyst line. However, the EPA Inspection Team observed this blind installed on the upstream side of the third 4-inch valve from the spent catalyst line (see Photographs 4 and 5 of Attachment 4).

- On February 28, 2025, the Facility provided a redlined version of the P&ID showing the planned corrections to the location of the blind (drawing number 10091500-78A-1216, revision 5, redlined February 21, 2025; Bates CHLM_01_00011997) and the finalized, corrected version of the P&ID (drawing number 10091500-78A-1216, revision 6; Bates CHLM_01_00011996).
- The EPA Inspection Team observed a local pressure indicator (PI) installed on the regenerated catalyst line immediately downstream of the regenerated catalyst slide valve (RCSV) 78HV106 (see Photograph 10 of Attachment 4). However, the P&ID for RCSV 78HV106 did not show this local PI (drawing number 10091500-78A-1213, revision 8; Bates CHLM_01_00004987).
 - On February 28, 2025, the Facility provided a redlined version of the P&ID showing the planned correction to include the local PI (drawing number 10091500-78A-1213, revision 8; Bates CHLM_01_00011995) and the finalized, corrected version of the P&ID (drawing number 10091500-78A-1213, revision 9; Bates CHLM_01_00011998).
- Alky Unit observations:
 - The EPA Inspection Team observed a leaking spiral nozzle on the water curtain on the east side of the acid evacuation system (AES) drum (C7956) (see Photograph 19 of Attachment 4).
 - The EPA Inspection Team observed vegetation growing through the fire protection of electrical wiring along the north side of the AES drum (C7956) (see Photograph 20 of Attachment 4).

DOCUMENTATION REVIEW

In response to the September 18, 2024, RFI, the Facility provided responsive documentation on November 18, 2024. This inspection report is inclusive of the documentation provided in response to the September 18, 2024, RFI. The EPA Inspection Team requested additional documentation at the end of the inspection on December 5, 2024, with a requested due date of January 24, 2025. Due to the 2025 Gulf Coast Blizzard (Winter Storm Enzo) in the area, EPA granted an extension for the additional documentation with a due date of January 31, 2025. The Facility provided responsive documentation on January 31, 2025. In response to the first draft of this report, the Facility provided additional documentation on February 28, 2025. This report has been updated to incorporate the review of the documentation received on February

28, 2025. After the EPA Inspection Team completes review of the documentation received on January 31, 2025, this inspection report will be updated accordingly.

40 CFR § 68.10 – Applicability

The EPA Inspection Team requested additional documentation on the applicability determination of the Facility's hydrodesulfurization (HDS) Unit, which is not included as a covered process in the Facility's risk management plan, and on the inclusion of railcars in maximum intended inventory calculations.

The EPA Inspection Team did not identify any areas of concern at this time pending receipt of additional documentation from the Facility in response to the December 5, 2024, document request and further document review.

40 CFR § 68.15 – Management Systems

The Facility maintains a document that provides guidance on the implementation of Risk Management Program requirements and references the Facility's Process Safety Management System (PSMS), which provides additional information on the implementation of Risk Management Program requirements (Bates CHLM_01_00002493 to CHLM_01_00002511).

The Facility's September 28, 2023, risk management plan submission identifies the Refinery Manager as the position responsible for Risk Management Program implementation.

The Facility's Risk Management Program implementation guidance document identifies, for each Risk Management Program requirement, the associated administrator from the corresponding section of the Facility's PSMS that is responsible for the implementation of that requirement (Bates CHLM_01_00002493 to CHLM_01_00002511).

The Facility also maintains an overall organization chart that identifies all positions and persons employed at the refinery and lines of authority among the positions (Bates CHLM_01_00000001 to CHLM_01_00000106).

The EPA Inspection Team requested additional documentation from the Facility that connects the PSMS Administrators to the positions identified in the organization chart.

The EPA Inspection Team did not identify any areas of concern at this time pending receipt of additional documentation from the Facility in response to the December 5, 2024, document request and further document review.

40 CFR § 68.22 – Offsite Consequence Analysis (OCA)

The Facility reported in its September 2023 RMP one worst-case release scenario (WCS) and one alternative release scenario (ARS) for a toxic regulated substance. For flammable regulated substances, the Facility reported one WCS and one ARS to each represent all flammable regulated substances across all covered processes.

Toxics WCS

The toxics WCS reported in the September 2023 RMP submission is described as a release of a gas liquified by pressure. The Facility used EPA's RMP*Comp to determine a worst-case distance to endpoint.

In the November 18, 2024, documentation, the Facility provided a spreadsheet (Bates CHLM_01_00002624) that provides additional details on the toxics WCS. The EPA Inspection Team used the MARPLOT^{6,7} software to map a radius centered at the approximate location of the point of release and determined a population within the mapped circle consistent with the population reported in the RMP to two significant figures.

The November 18, 2024, documentation provided by the Facility does not document the data used to estimate population and environmental receptors potentially affected. The documentation does not identify any mapping software, U.S. Census data, U.S. Geological Survey data, or other information used to estimate the residential population and identify the types of public and environmental receptors. The February 28, 2025, documentation provided by the Facility states that the Facility uses the MARPLOT software for identifying residential populations and public and environmental receptors. The Facility provided a screenshot of a MARPLOT map; however, the date the map was generated was not provided (Bates CHLM_01_00011988).

Flammables WCS

The flammables WCS reported in the September 2023 RMP submission is described as a vapor cloud explosion of a flammable mixture. The endpoint was defined as a 1 psi overpressure. The Facility used EPA's RMP*Comp to determine a distance to endpoint.

In the November 18, 2024, documentation, the Facility provided a spreadsheet (Bates CHLM_01_00002622) that provides additional details on the flammables WCS. The EPA Inspection Team used the MARPLOT^{6,7} software to map a radius centered at the approximate location of the point of release and determined a population within the mapped circle consistent with the population reported in the RMP to two significant figures.

The November 18, 2024, documentation provided by the Facility does not document the data used to estimate population and environmental receptors potentially affected. The documentation does not identify any mapping software, U.S. Census data, U.S. Geological Survey data, or other information used to estimate the residential population and identify the types of public and environmental receptors. The February 28, 2025, documentation provided by the Facility states that the Facility uses the MARPLOT software for identifying residential populations and public and environmental receptors. The Facility provided a screenshot of a

⁶ MARPLOT [Mapping Application for Response, Planning, and Local Operational Tasks] Software; U.S. Environmental Protection Agency (EPA); <https://www.epa.gov/cameo/marplot-software>

⁷ At the time of the EPA Inspection Team's analysis, the current version of the MARPLOT software was still using the 2010 U.S. Census Data.

MARPLOT map; however, the date the map was generated was not provided (Bates CHLM_01_00011992).

Toxics ARS

The toxics ARS reported in the September 2023 RMP submission was described as a release of a gas liquified by pressure. The Facility used EPA's RMP*Comp to determine a distance to endpoint.

In the November 18, 2024, documentation, the Facility provided a spreadsheet (Bates CHLM_01_00002623) that provides additional details on the toxics ARS. The EPA Inspection Team used the MARPLOT^{6,7} software to map a radius centered at the approximate location of the point of release and determined a population within the mapped circle consistent with the population reported in the RMP.

The November 18, 2024, documentation provided by the Facility does not document the data used to estimate population and environmental receptors potentially affected. The documentation does not identify any mapping software, U.S. Census data, U.S. Geological Survey data, or other information used to estimate the residential population and identify the types of public and environmental receptors. The February 28, 2025, documentation provided by the Facility states that the Facility uses the MARPLOT software for identifying residential populations and public and environmental receptors. The Facility provided a screenshot of a MARPLOT map; however, the date the map was generated was not provided (Bates CHLM_01_00011990).

Flammables ARS

The flammables ARS reported in the September 2023 RMP submission was described as a vapor cloud explosion of a flammable mixture. The endpoint was defined as a 1 psi overpressure. The Facility used EPA's RMP*Comp to determine a distance to endpoint.

In the November 18, 2024, documentation, the Facility provided a spreadsheet (Bates CHLM_01_00002621) that provides additional details on the flammables ARS. The spreadsheet does not provide an estimate or basis of the duration of the release used to calculate the quantity released.

The February 28, 2025, documentation stated that the deluge and emergency shutdown systems were considered in modeling the scenario, but the documentation did not document the effect of the controls and mitigation on the release quantity and rate.

The November 18, 2024, documentation provided by the Facility does not document the data used to estimate population and environmental receptors potentially affected. The documentation does not identify any mapping software, U.S. Census data, U.S. Geological Survey data, or other information used to estimate the residential population and identify the types of public and environmental receptors. The February 28, 2025, documentation provided by the Facility states that the Facility uses the MARPLOT software for identifying residential

populations and public and environmental receptors. The Facility provided a screenshot of a MARPLOT map; however, the date the map was generated was not provided (Bates CHLM_01_00011986).

The EPA Inspection Team has identified AOC #1 and AOC #2 at the end of this inspection report for this Subpart B §§ 68.22 to 68.39 – Offsite Consequence Analysis provision.

40 CFR § 68.42 – Five Year Accident History

The Facility reported no accidents subject to 40 CFR § 68.42 reporting in its September 23, 2023, RMP.

40 CFR § 68.65 - Process Safety Information (PSI)

In response to the September 18, 2024, RFI, the Facility provided the following PSI documentation for Alky Unit and FCCU:

- Detailed process flow diagrams (Bates CHLM_01_00000116 to CHLM_01_00000117);
- P&IDs (Bates CHLM_01_00004779 to CHLM_01_00005170);
- Electrical classification drawings (Bates CHLM_01_00005171 to CHLM_01_00005172);
- Cause and effect diagrams (Bates CHLM_01_00005173 to CHLM_01_00005267);
- Safety data sheets (SDSs) (Bates CHLM_01_00005268 to CHLM_01_00005612);
- Narratives of process descriptions (Bates CHLM_01_00005651 to CHLM_01_00005686, CHLM_01_00005697 to CHLM_01_00005718, CHLM_01_00005804 to CHLM_01_00005862, and CHLM_01_00005895 to CHLM_01_00005946);
- Process chemistry documentation (Bates CHLM_01_00005688 to CHLM_01_00005696) and CHLM_01_00005876 to CHLM_01_00005894);
- Maximum intended inventories (Bates CHLM_01_00005719, CHLM_01_00005875, and CHLM_01_00005947);
- Safe upper and lower limits and consequences of deviation (Bates CHLM_01_00005613 to CHLM_01_00005650 and CHLM_01_00005720 to CHLM_01_00005803);
- List of codes and standards used to design and maintain each process (Bates CHLM_01_00005984 to CHLM_01_00006807);
- Material and energy balances (Bates CHLM_01_00005687 and CHLM_01_00005863 to CHLM_01_00005874); and
- Safety systems and their functions (Bates CHLM_01_00006808 to CHLM_01_00006946).

The EPA Inspection Team also requested additional PSI documentation in the December 5, 2024, document request.

The EPA Inspection Team has identified AOC #3 at the end of this inspection report for this Subpart D § 68.65 – Process Safety Information provision. For additional detail, please refer to the Field Observations section of this inspection report for findings and potential areas of concern identified based on the detailed P&ID walkdown conducted during the inspection.

40 CFR § 68.67 - Process Hazard Analysis (PHA)

The Facility maintains a procedure for conducting PHAs (Bates CHLM_01_00002660 to CHLM_01_00002718 and CHLM_01_00002659). The methods used by the Facility for conducting PHAs include Hazard and Operability Study (HAZOP), What-if, What-if/Checklist, and Layers of Protection Analysis (LOPA).

The EPA Inspection Team also requested additional PHA documentation in the December 5, 2024, document request.

The EPA Inspection Team has not identified any areas of concern at this time pending receipt of additional documentation from the Facility in response to the December 5, 2024, document request and further document review.

40 CFR § 68.69 – Operating Procedures

The Facility maintains a procedure for developing, updating, reviewing, and managing operating procedures (Bates CHLM_01_00002720 to CHLM_01_00002752).

Review of Hardcopy Operating Procedures in the Central Control Room

During the walking tour of the central control room the EPA Inspection Team reviewed a selection of hardcopy FCCU emergency procedures. The Facility maintains binders of hardcopies of emergency procedures in the central control room in the event electronic procedures stored on the Facility's SharePoint site become inaccessible. The EPA Inspection Team reviewed the following emergency procedures in the FCCU emergency procedure binder:

- An emergency procedure printed on October 16, 2019.
- An emergency procedure dated July 2015.
- An emergency procedure dated August 2007.
- An emergency procedure dated August 2007.

The Facility's list of FCCU operating procedures identified the following most recent audit and modification dates of the four emergency procedures listed above (Bates CHLM_01_00008901):

- Last audit and last modified on October 6, 2023.
- Last audit on June 16, 2022, and last modified on June 26, 2022.
- Last audit on June 16, 2022, and last modified on June 26, 2022.
- Last audit on April 19, 2021, and last modified on July 13, 2021.

The hardcopies of four FCCU emergency procedures located in the FCCU emergency procedure binder were not the current copies of those procedures at the time of the inspection available via the Facility's SharePoint. Therefore, in the event the operating procedure SharePoint becomes inaccessible, the current versions of these emergency procedures would not be readily accessible to employees.

The EPA Inspection Team has identified AOC #4 at the end of this inspection report for this Subpart D § 68.69 – Operating Procedures provision.

40 CFR § 68.71 – Training

The Facility has developed a Basic Operator Training (BOT) program for all new refinery operators. Training involves a five-week BOT course that has a set curriculum for all new operators. Following this, new operators are evaluated for their proficiency and assigned to a unit where they are required to pass unit specific qualification tests, which are then signed off after the operator completes a review board interview and test. During the initial operator training, an operator completes a total of 15 exams (field and paper) as well as a comprehensive final exam to show proficiency in their operating abilities. Operators must work 48 hours within a six-month period to maintain the qualification for a position within a unit. Refresher training occurs every three years for each operator and is tracked in Active Learner®.⁸ Operator refresher training can be led by any other person that is qualified in the same position. Facility representatives stated the lead refresher training position is most often filled by the lead unit operator.

The EPA Inspection Team has not identified any areas of concern at this time pending receipt of additional documentation from the Facility in response to the December 5, 2024, document request and further document review.

40 CFR § 68.73 – Mechanical Integrity

According to interviews with Facility personnel conducted during the inspection, the Facility follows American Petroleum Institute (API) 570, *Piping Inspection Code: In-Service Inspection, Rating, Repair, and Alteration of Piping Systems* for setting ultrasonic thickness (UT) testing and visual inspection intervals for piping and implements a risk-based inspection (RBI) program following API Recommended Practice (RP) 580, *Elements of a Risk-Based Inspection Program* for defining its mechanical integrity program for pressure vessels. For the Alkylation Unit, the Facility follows the intervals in API RP 751, *Safe Operation of Hydrofluoric Acid Alkylation Units* for defining the visual, thickness, and internal inspection program for that unit.

The Facility uses the Plant Condition Management Software (PCMS) for managing inspection data. The Facility uses a third-party contractor, Acuren, to conduct non-destructive examination (NDE) inspections and has Facility-employed API-certified inspectors who conduct visual external and internal inspections and review inspection results produced by contractor inspectors.

The Facility uses an SAP⁹ software product to manage its preventative maintenance (PM) and predictive maintenance (PdM) tasks for rotating equipment. The Facility uses the IntelliTrack software to document visual observations of rotating equipment conducted by operators

⁸ Active Learner® is a web-based training management software sold and licensed by PetroSkills. *Learning Management & Compliance*; PetroSkills; <https://petroskills.com/solutions/learning-management-and-compliance>

⁹ SAP is a company that provides enterprise application software products; <https://www.sap.com/index.html>.

during rounds. Approximately more than three-quarters of the Facility's rotating equipment assets have online monitoring instrumentation. The Facility also conducts monthly rounds on rotating equipment using handheld vibration monitors.

The EPA Inspection Team has not identified any areas of concern at this time pending receipt of additional documentation from the Facility in response to the December 5, 2024, document request and further document review.

40 CFR § 68.75 – Management of Change (MOC)

The Facility maintains a management of change procedure that governs changes subject to the MOC process (Bates CHLM_01_00003042 to CHLM_01_00003077). The procedure defines the roles, responsibilities, and process for implementing changes. The Facility uses the IMPACT software to manage changes and track MOC action items.

The EPA Inspection Team has not identified any areas of concern at this time pending receipt of additional documentation from the Facility in response to the December 5, 2024, document request and further document review.

40 CFR § 68.77 – Pre-Startup Safety Review (PSSR)

The Facility maintains a pre-startup safety review procedure that governs pre-startup safety reviews conducted as part of capital projects and the MOC process (Bates CHLM_01_00003079 to CHLM_01_00003095). The procedure defines the roles, responsibilities, and process for conducting pre-startup safety reviews. The Facility uses the IMPACT software to manage changes and track MOC action items, including PSSR action items.

The EPA Inspection Team has not identified any areas of concern at this time pending receipt of additional documentation from the Facility in response to the December 5, 2024, document request and further document review.

40 CFR § 68.79 – Compliance Audits

The Facility completed its two most recent compliance audits in December 2019 and December 2022 using audit teams comprising members from PBF Energy and AcuTech Consulting Group, a third-party contractor used across PBF Energy sites. The 2019 compliance audit resulted in 13 findings related to process safety information, process hazard analysis, mechanical integrity, management of change, incident investigation, and emergency response (Bates CHLM_01_00003098 to CHLM_01_00003118). The 2022 compliance audit resulted in 12 findings related to process safety information, mechanical integrity, management of change, emergency response, and compliance audits (Bates CHLM_01_00003122 to CHLM_01_00003141).

The December 2019 compliance audit (Bates CHLM_01_00003098 to CHLM_01_00003118) identified the following two findings on the mechanical integrity program:

- Finding #9
- Finding #10

The Facility provided documentation of the tracking and resolution of the action items assigned to the 2019 compliance audit recommendations (Bates CHLM_01_00003096 to CHLM_01_00003097). This documentation does not include any actions that the Facility took to respond to recommendations Finding #9 and Finding #10. Therefore, the Facility did not document an appropriate response to each of the findings of the 2019 compliance audit and did not document that deficiencies had been corrected.

The EPA Inspection Team has identified AOC #5 at the end of this inspection report for this Subpart D § 68.79 – Compliance Audits provision.

40 CFR § 68.81 – Incident Investigation

The Facility maintains an incident investigation procedure that covers the requirements for incident documentation, notification, and investigation at the Facility (Bates CHLM_01_00003150 to CHLM_01_00003182).

The EPA Inspection Team has not identified any areas of concern at this time pending receipt of additional documentation from the Facility in response to the December 5, 2024, document request and further document review.

40 CFR § 68.83 – Employee Participation

The Facility maintains an employee participation plan that details how the employee participation requirements of OSHA’s Process Safety Management (PSM) standard and EPA’s Risk Management Program standard are implemented at the Facility (Bates CHLM_01_00003168 to CHLM_01_00003196).

This plan states that union employees and managers attend monthly meetings of the Joint Health and Safety Committee (JHSC). The JHSC members, “discuss and seek resolution on safety related issues and concerns (Bates CHLM_01_00003188).” The policy states that employees also participate in updating PSI, PHA and compliance audit sessions, reviewing operating procedures, the development and validation of training materials, reviewing site-specific safety information with contractors as part of the Safe Work Permit process, the MOC and PSSR process, incident investigations, and refinery emergency drills.

The EPA Inspection Team has not identified any areas of concern at this time pending receipt of additional documentation from the Facility in response to the December 5, 2024, document request and further document review.

40 CFR § 68.85 – Hot Work Permits

The Facility maintains a safe work permitting procedure that sets requirements for the safe execution of work (Bates CHLM_01_00003197 to CHLM_01_00003260).

Section 17 of the *Safe Work Permitting* procedure provides the procedures for conducting hot work. Section 17 and an attachment define three classes of hot work: 1) Class 1 (Non-Flame Hot Work Permit); 2) Class 2 (Hot Work Permit); and Class 3 (Special Hot Work Permit). Class 1 example work includes, but is not limited to, the use of electronic and electrical tools and equipment and sandblasting. Class 2 example work includes, but is not limited to, the use of welding/brazing, cutting/grinding, arc gouging, and explosive actuated tools. Class 3 example work includes, but is not limited to, conducting hot tapping and welding on in-service hydrocarbon piping. A firewatch is required for Class 2 and Class 3 work but not Class 1 work (Bates CHLM_01_00003244).

The EPA Inspection Team has not identified any areas of concern at this time pending receipt of additional documentation from the Facility in response to the December 5, 2024, document request and further document review.

40 CFR § 68.87 – Contractors

The Facility maintains a contractor safety manual, which includes procedures on the selection and removal of contractors (Bates CHLM_01_00003261 to CHLM_01_00003272), the orientation of contractors (Bates CHLM_01_00003273 to CHLM_01_00003286), and a buddy manager program (Bates CHLM_01_00003287 to CHLM_01_00003299).

The Facility requires all contractors to subscribe to ISNetwork (ISN), a third-party contractor safety data management provider, to become qualified to perform work at the refinery. Contractors designated as Level 1 or Level 2 must receive an ISN status of “A” or “B” before being approved to work at the Facility. Level 1 and Level 2 contractors that have fewer than five people who work at the Facility may be exempted from the Facility’s ISN requirements. Contractors designated as Level 3 receive from the Facility a copy of the ACL [Approved Contractor List] Contractor Qualification and Contractor Qualification Questionnaire, which are then reviewed by the Facility’s Contractor Safety Coordinator for approval (Bates CHLM_01_00003269).

The contractor orientation provides the minimum topics included in contractor site orientation (Bates CHLM_01_00003280). The buddy manager program establishes a program for the managers of embedded contractors with significant personnel exposure hours, contractors with performance issues, and contractors performing high risk work to be paired with a Facility representative who works with the contractor manager to ensure safety (Bates CHLM_01_00003287).

The EPA Inspection Team has not identified any areas of concern at this time pending receipt of additional documentation from the Facility in response to the December 5, 2024, document request and further document review.

40 CFR § 68.95 – Emergency Response

The Facility is a responding facility and has the capability to address emergency situations including fires, chemical releases, and medical emergencies. The Facility’s fire brigade is led by a

full-time fire chief and includes five full-time Emergency Response Technicians (ERTs), one for each shift and one relief, a firewater technician, and 139 trained volunteer members. The fire chief and one volunteer are also certified emergency medical technicians (EMTs) and one volunteer is a certified paramedic. Three Medical Occupational Health (MOH) employees are certified nurses. One ERT is onsite 24/7 and acts as the incident commander in the case of an incident.

Firefighting equipment includes two pumper trucks (2,000 gallons per minute [gpm] capacity), one super pumper truck (6,500 gpm capacity), one ladder truck (75-foot reach, 2,000 gpm capacity), one rescue truck that carries equipment, and one hazardous materials (HAZMAT) response truck. The Facility maintains HF acid treatment kits at the machine shop, in the onsite laboratory, within the Alkylation Unit, and in the ERT pickup truck. HF acid treatment kits contain calcium gluconate to treat eye, inhalation, ingestion, and topical contact with HF acid. The Facility also maintains “to-go” HF acid treatment kits that include instructions for the next level of care and are given to the responding ambulance in the event a person is exposed to HF at the Facility and requires medical transport to the hospital.

Water spray cannons are located both in and around the Alkylation unit (Bates CHLM_01_00006833 to CHLM_01_00006907) to contain an HF release from the unit. The Facility contracts the maintenance of the self-contained breathing apparatuses (SCBAs), hoses, pumps, sprinklers, and fire extinguishers located throughout the refinery to a third party.

All fire brigade members receive an annual 8-hour live fire training and are part of weekly onsite drills specific to one area of the refinery that changes each month. The same drill is completed once for each shift to ensure that all employees are a part of the same drill before switching to the next area of the refinery. The Facility meets bimonthly with the St. Bernard Parish Local Emergency Planning Committee (LEPC) at meetings held by the LEPC and provided documentation of attendance of these meetings. Additionally, Facility personnel indicated that the fire chief for the nearby Valero Refinery and representatives of the Department of Homeland Security attend these LEPC meetings.

The EPA Inspection Team has not identified any areas of concern at this time pending receipt of additional documentation from the Facility in response to the December 5, 2024, document request and further document review.

40 CFR § 68.195 – Risk Management Plan

The Facility submitted risk management plans to EPA in 1999, 2004, 2008, 2013, 2018, and 2023. The Facility submitted its most recent risk management plan on September 28, 2023, which was a five-year update.

The EPA Inspection Team has not identified any areas of concern at this time pending receipt of additional documentation from the Facility in response to the December 5, 2024, document request and further document review.

CLOSING CONFERENCE

The EPA Inspection Team held a closing conference with Facility representatives at approximately 12:41 pm CST on December 5, 2024, in a conference room in the administration building. Inspector Gaglione initiated the closing conference by summarizing the inspection activities that occurred over the week and thanked the Facility personnel for their time and cooperation. Inspector Gaglione summarized the next steps including a follow-up document request and the estimated timing of the delivery of the inspection report to the Facility within 60 days. Inspector Gaglione stated that the EPA Inspection Team did not have any areas of concern to share at that time. The Attendance Sheet (see Attachment 1) records all Facility personnel present at the closing conference.

After the closing conference, the EPA Inspection Team reviewed the request for additional documentation with Facility personnel. Inspector Gaglione and Katherine Orgeron, the Facility HSE Manager, signed this document request (see Attachment 5). The Facility made a copy of the signed document request for its records and the EPA Inspection Team retained the originals.

The Facility reviewed the 27 inspection photographs taken by the EPA Inspection Team and opted not to make any CBI claims on the contents of the photographs.

AREAS OF CONCERN

1. **OCA Documentation, 40 CFR § 68.39(b)** – *The owner or operator shall maintain the following records on the offsite consequence analyses: (b) For alternative release scenarios, a description of the scenarios identified, assumptions and parameters used, and the rationale for the selection of specific scenarios; assumptions shall include use of any administrative controls and any mitigation that were assumed to limit the quantity that could be released. Documentation shall include the effect of the controls and mitigation on the release quantity and rate.*
 - The Facility's flammables ARS documentation (Bates CHLM_01_00002621) does not identify the vessel or piping from which the release occurs or the flammable substances that comprise the released flammable mixture. The spreadsheet provides the calculation used to estimate the release rate but does not provide an estimate or basis of the duration of the release used to calculate the quantity released including any administrative controls or mitigation assumed to limit the quantity released. Therefore, the Facility failed to maintain records on the description of the scenario identified, assumptions and parameters used, and the effect of controls and mitigation on the release quantity and rate.
2. **OCA Documentation, 40 CFR § 68.39(e)** – *The owner or operator shall maintain the following records on the offsite consequence analyses: (e) Data used to estimate population and environmental receptors potentially affected.*

- The November 2024 documentation provided by the Facility for each WCS and ARS reported in its RMP does not document the data used to estimate population and environmental receptors potentially affected. The November 2024 documentation does not identify any mapping software, U.S. Census data, U.S. Geological Survey data, or other information used to estimate the residential population and identify the types of public and environmental receptors. Therefore, the Facility failed to maintain records of the data used to estimate population and environmental receptors potentially affected.
- 3. Process Safety Information (PSI), 40 CFR § 68.65(d)(1)(ii) – 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).**
- During the field verification of equipment noted on P&IDs, the EPA Inspection Team observed inaccuracies in the P&ID of spent catalyst slide valve (SCSV) 78HV105 (drawing number 10091500-78A-1216, revision 5; Bates CHLM_01_00005019) and the P&ID of the regenerated catalyst slide valve (RCSV) 78HV106 (drawing number 10091500-78A-1213, revision 8; Bates CHLM_01_00004987). Therefore, the Facility failed to maintain accurate PSI.
- 4. Operating Procedures, 40 CFR § 68.69(b) – Operating procedures shall be readily accessible to employees who work in or maintain a process.**
- The hardcopies of four FCCU emergency procedures located in the FCCU emergency procedure binder were not the current copies of those procedures at the time of the inspection. Therefore, in the event the operating procedure SharePoint becomes inaccessible, the current versions of these emergency procedures would not be readily accessible to employees in the central control room. Therefore, the Facility failed to maintain operating procedures readily accessible to employees who work in or maintain a process, as required.
- 5. Compliance Audits, 40 CFR § 68.79(d) – The 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.**
- The Facility provided documentation of the tracking and resolution of the action items assigned to the 2019 compliance audit recommendations (Bates CHLM_01_00003096 to CHLM_01_00003097). This documentation does not include any actions in response to recommendations Finding #9 and Finding #10. Therefore, the Facility did not document an appropriate response to each of the findings of the 2019 compliance audit and did not document those deficiencies had been corrected, as required.

LIST OF ATTACHMENTS

Attachment 1: Attendance Sheet

Attachment 2: Signed Notice of Inspection

Attachment 3: Signed Receipt of Notice of Right to Claim Confidentiality

Attachment 4: Photograph Log

Attachment 5: Signed Document Review/Request List

Attachment 1

Attendance Sheet



INSPECTION ATTENDANCE SHEET
U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 6
Clean Air Act §112(i) General Duty Clause (GDC) and Risk Management Program (RMP)

DATE/TIME:
December 2 to 6, 2024

Inspector Name:
Anthony Gaglione

FACILITY NAME:
Chalmette Refining, L.L.C.

FACILITY ADDRESS:
500 West Saint Bernard Highway
Post Office Box 1007
Chalmette, Louisiana 70044

NAME	AFFILIATION/TITLE	PHONE	EMAIL
Anthony Gaglione	ERG, Contractor for EPA / Inspector		
Grady Thibodeau	ISM Manager CAC		
Kathleen Deppe	HSE manager CAC		
Sara Valentin	Refining Attorney		
Peter Christians	Answer		
Chris Cunningham	Env Manager		
Scott Eberhart	Lead Process Engineer		
Joe Salzer	Mech. Engineer		
Joan Buas	Unit Inspector		
Justin Alessandro	Instrumentation & Controls Mgr		
Kevin Fares	Technical Manager		

DATE/TIME: December 2 to 6, 2024		FACILITY NAME: Chalmette Refining, L.L.C.	
NAME	AFFILIATION/TITLE	PHONE	EMAIL
Matthew Cassidy	Mechanical Integrity & Reliability Manager		
Greg Ruiz	Safety Manager		
Christopher Smith	Env Scientist LDEQ		
Liam Prud'homme	ERG		
Adam Egan	Business Team Lead		
Allison Tinsley	Training Superintendent		
Cheryl Keller	MOC Admin/Coordinator		
James Hindman	Machinery Engineering Supv.		
Jeremy Stamwits	Business Lead		
Gra Phillips	Stillman/Union V.P.		
Greg Gaudet	PSM Rep		
James Mermy	Contractor Safety		
Mark Ethelwood	FIRE CHIEF		
JOSEPH VODAREN	MEDICAL DEPT		
Rebecca Bourne	HSE Audits Mgr		
Brad Karske	SWP Supervisor		
Anastasia Zhilypova	Ops Manager		
Tara Wimbush	Refinery Manager		
Layne Araki	Economics and Planning Mgr		

Attachment 2

Signed Notice of Inspection



NOTICE OF INSPECTION

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 6

Clean Air Act §112(r) General Duty Clause (GDC) and Risk Management Program (RMP)

DATE/TIME:
December 2 to 8, 2024
5

FACILITY NAME:
Chalmette Refining, L.L.C.

LEAD INSPECTOR:
Anthony Gaglione

FACILITY ADDRESS:
500 West Saint Bernard Highway
Post Office Box 1007
Chalmette, Louisiana 70044

REASON FOR INSPECTION: U.S. EPA is conducting this inspection for the purpose of determining compliance with the requirements of Section 112(r) of the Clean Air Act (CAA).

The scope of this inspection may include but is not limited to reviewing and obtaining copies of documents and records; interviews and taking of statements; reviewing of chemical manufacturing, importing, processing, and/or use facilities, including waste handling and treatment operations; taking samples and photographs; and any other inspection activities necessary to determine compliance with the Acts.

INSPECTOR SIGNATURE

RECIPIENT SIGNATURE

NAME

Anthony Gaglione

NAME

Katherine O'Keefe

TITLE

Inspector

DATE SIGNED

12/2/2024

TITLE

HSE manager

DATE SIGNED

12/2/2024

Attachment 3

Signed Receipt of Notice of Right to Claim Confidentiality



RECEIPT OF NOTICE OF RIGHT TO CLAIM CONFIDENTIALITY

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 6

Clean Air Act §112(r) General Duty Clause (GDC) and Risk Management Program (RMP)

DATE/TIME: 5 th December 2 to 8, 2024	FACILITY NAME: Chalmette Refining, L.L.C.
LEAD INSPECTOR: Anthony Gaglione	FACILITY ADDRESS: 500 West Saint Bernard Highway Post Office Box 1007 Chalmette, Louisiana 70044

Notice of Right to Claim Confidentiality: You may assert a business confidentiality claim covering all or part of the information requested during the course of this inspection, as provided in 40 C.F.R. §2.203(b). To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document over which you make a claim of confidentiality should be marked by either attaching a cover sheet stamped or typed with a legend to indicate the intent to claim confidentiality. The stamp or typed legend or other suitable form of notice should employ language such as "trade secret" or "proprietary" or "company confidential" and indicate a date if any when the information should no longer be treated as confidential.

All confidentiality claims are subject to agency verification and must be made in accordance with 40 C.F.R. §2.208 which provides in part that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; and that the information is not and has not been, reasonably obtainable by legitimate means without your consent.

NOTE: Signature of this Receipt of Notice of Right to Claim Confidentiality verifies only that such notice has been received and does not waive that right.

INSPECTOR SIGNATURE 		RECIPIENT SIGNATURE 	
NAME Anthony Gaglione		NAME Katherine Orgeron	
TITLE Inspector	DATE SIGNED 12/2/2024	TITLE HSE manager	DATE SIGNED 12/2/2024

Attachment 4

Photograph Log

Attachment 4: Photograph Log

Facility	Chalmette Refining, L.L.C.
Facility Location	Chalmette, Louisiana
Photographers	Liam Prendergast
Camera Equipment	OM System TG-7 (C0010)
Inspection and Photograph Date(s)	12/3/2024

Photo ID	Camera ID	Photograph Date	Description
1	PC030014.JPG	12/3/2024	Overview of the regenerator catalyst slide valve (78HV106) hydraulic skid located at ground level in the FCC Unit.
2	PC030015.JPG	12/3/2024	Overview of the spent catalyst control valve (78HV104) hydraulic skid located at ground level in the FCC Unit.
3	PC030016.JPG	12/3/2024	Bottom of third stage separator (C7827) on the regenerator overhead duct in the FCC Unit.
4	PC030017.JPG	12/3/2024	Vent line (line number 78-688-A1-4"--(F)) between spent catalyst slide valves 78HV104 and 78HV105 in the FCC Unit.
5	PC030018.JPG	12/3/2024	Vent line (line number 78-688-A1-4"--(F)) between spent catalyst slide valves 78HV104 and 78HV105, which vents to atmosphere (right), with a blind installed upstream of the third 4-inch valve (center) in the FCC Unit.
6	PC030019.JPG	12/3/2024	Manual bypass engagement panel for spent catalyst control valve 78HV104 in the FCC Unit.
7	PC030020.JPG	12/3/2024	Spent catalyst control valve 78HV104 in the FCC Unit.
8	PC030021.JPG	12/3/2024	Reactor riser emergency steam control valve (78HV103) in the FCC Unit.
9	PC030022.JPG	12/3/2024	Handwheel engagement operation job aid placard for regenerator catalyst slide valve 78HV106 in the FCC Unit.
10	PC030023.JPG	12/3/2024	Regenerator catalyst slide valve 78HV106 in the FCC Unit.
11	PC030024.JPG	12/3/2024	Overview of HF acid truck unloading station showing HF line (left), nitrogen line (center), and emergency shutdown air supply (right) in the Alky Unit.
12	PC030025.JPG	12/3/2024	Overview of HF acid truck unloading station showing HF line (left), nitrogen line (center), and emergency shutdown air supply (right) in the Alky Unit.

Attachment 4: Photograph Log

Photo ID	Camera ID	Photograph Date	Description
13	PC030026.JPG	12/3/2024	HF acid truck unloading station with HF line (center), nitrogen line (right), and emergency shower (left, background) in the Alky Unit.
14	PC030027.JPG	12/3/2024	Line-of-sight HF detectors AT028 (left) and AT027 (right) on the northeast corner of the Alky Unit. AT028 points south, covering the east perimeter of the unit, and AT027 points west, covering the north perimeter of the unit.
15	PC030028.JPG	12/3/2024	Reflectors for line-of-sight HF detectors AT028 (right) and AT030 (left) on the southeast corner of the Alky Unit.
16	PC030029.JPG	12/3/2024	Reflectors for line-of-sight HF detectors AT028 (right) and AT030 (left) on the southeast corner of the Alky Unit.
17	PC030030.JPG	12/3/2024	Three elevated water monitors (V-7933, V-7932, and V-7920, left to right) along the east perimeter of the Alky Unit.
18	PC030031.JPG	12/3/2024	Acid evacuation drum (AED) (C-7956) (right) and acid evacuation system (AES) acid relief neutralizer (C-7955) (left) in the Alky Unit.
19	PC030032.JPG	12/3/2024	Fixed water monitor and water curtain on the southeast corner of the AES area in the Alky Unit.
20	PC030033.JPG	12/3/2024	North side of AED (C-7956) with vegetation growing from fire protection of electrical wiring in the Alky Unit.
21	PC030034.JPG	12/3/2024	Reflectors for line-of-sight HF detectors AT027 (left) and AT029 (right) on the northwest corner of the Alky Unit.
22	PC030035.JPG	12/3/2024	Reflector for line-of-sight HF detector AT027 on the northwest corner of the Alky Unit.
23	PC030036.JPG	12/3/2024	HF acid sample station underneath the E7904C and E7904D HF acid coolers in the Alky Unit.
24	PC030037.JPG	12/3/2024	HF acid sample station (back) and eyewash/safety shower (front) in the Alky Unit.
25	PC030038.JPG	12/3/2024	E7904C HF acid cooler dump valve (79HV202) (right) and block valve (left) in the Alky Unit.
26	PC030039.JPG	12/3/2024	E7904C HF acid cooler and boot with acid rerun emergency block valve (EBV) 79EBV7906
27	PC030040.JPG	12/3/2024	Acid rerun pump in the Alky Unit.

Attachment 4: Photograph Log



Photograph 1 - File: PC030014.JPG

Overview of the regenerator catalyst slide valve (78HV106) hydraulic skid located at ground level in the FCC Unit.



Photograph 2 - File: PC030015.JPG

Overview of the spent catalyst control valve (78HV104) hydraulic skid located at ground level in the FCC Unit.

Attachment 4: Photograph Log



Photograph 3 - File: PC030016.JPG

Bottom of third stage separator (C7827) on the regenerator overhead duct in the FCC Unit.

Attachment 4: Photograph Log



Photograph 4 - File: PC030017.JPG

Vent line (line number 78-688-A1-4"--(F)) between spent catalyst slide valves 78HV104 and 78HV105 in the FCC Unit.



Photograph 5 - File: PC030018.JPG

Vent line (line number 78-688-A1-4"--(F)) between spent catalyst slide valves 78HV104 and 78HV105, which vents to atmosphere (right), with a blind installed upstream of the third 4-inch valve (center) in the FCC Unit.

Attachment 4: Photograph Log



Photograph 6 - File: PC030019.JPG

Manual bypass engagement panel for spent catalyst control valve 78HV104 in the FCC Unit.



Photograph 7 - File: PC030020.JPG

Spent catalyst control valve 78HV104 in the FCC Unit.

Attachment 4: Photograph Log



Photograph 8 - File: PC030021.JPG

Reactor riser emergency steam control valve (78HV103) in the FCC Unit.



Photograph 9 - File: PC030022.JPG

Handwheel engagement operation job aid placard for regenerator catalyst slide valve 78HV106 in the FCC Unit.

Attachment 4: Photograph Log



Photograph 10 - File: PC030023.JPG

Regenerator catalyst slide valve 78HV106 in the FCC Unit.

Attachment 4: Photograph Log



Photograph 11 - File: PC030024.JPG

Overview of HF acid truck unloading station showing HF line (left), nitrogen line (center), and emergency shutdown air supply (right) in the Alky Unit.

Attachment 4: Photograph Log



Photograph 12 - File: PC030025.JPG

Overview of HF acid truck unloading station showing HF line (left), nitrogen line (center), and emergency shutdown air supply (right) in the Alky Unit.

Attachment 4: Photograph Log



Photograph 13 - File: PC030026.JPG

HF acid truck unloading station with HF line (center), nitrogen line (right), and emergency shower (left, background) in the Alky Unit.

Attachment 4: Photograph Log



Photograph 14 - File: PC030027.JPG

Line-of-sight HF detectors AT028 (left) and AT027 (right) on the northeast corner of the Alky Unit. AT028 points south, covering the east perimeter of the unit, and AT027 points west, covering the north perimeter of the unit.



Photograph 15 - File: PC030028.JPG

Reflectors for line-of-sight HF detectors AT028 (right) and AT030 (left) on the southeast corner of the Alky Unit.

Attachment 4: Photograph Log



Photograph 16 - File: PC030029.JPG

Reflectors for line-of-sight HF detectors AT028 (right) and AT030 (left) on the southeast corner of the Alky Unit.



Photograph 17 - File: PC030030.JPG

Three elevated water monitors (V-7933, V-7932, and V-7920, left to right) along the east perimeter of the Alky Unit.

Attachment 4: Photograph Log



Photograph 18 - File: PC030031.JPG

Acid evacuation drum (AED) (C-7956) (right) and acid evacuation system (AES) acid relief neutralizer (C-7955) (left) in the Alky Unit.



Photograph 19 - File: PC030032.JPG

Fixed water monitor and water curtain on the southeast corner of the AES area in the Alky Unit.

Attachment 4: Photograph Log



Photograph 20 - File: PC030033.JPG

North side of AED (C-7956) with vegetation growing from fire protection of electrical wiring in the Alky Unit.

Attachment 4: Photograph Log



Photograph 21 - File: PC030034.JPG

Reflectors for line-of-sight HF detectors AT027 (left) and AT029 (right) on the northwest corner of the Alky Unit.



Photograph 22 - File: PC030035.JPG

Reflector for line-of-sight HF detector AT027 on the northwest corner of the Alky Unit.

Attachment 4: Photograph Log



Photograph 23 - File: PC030036.JPG

HF acid sample station underneath the E7904C and E7904D HF acid coolers in the Alky Unit.

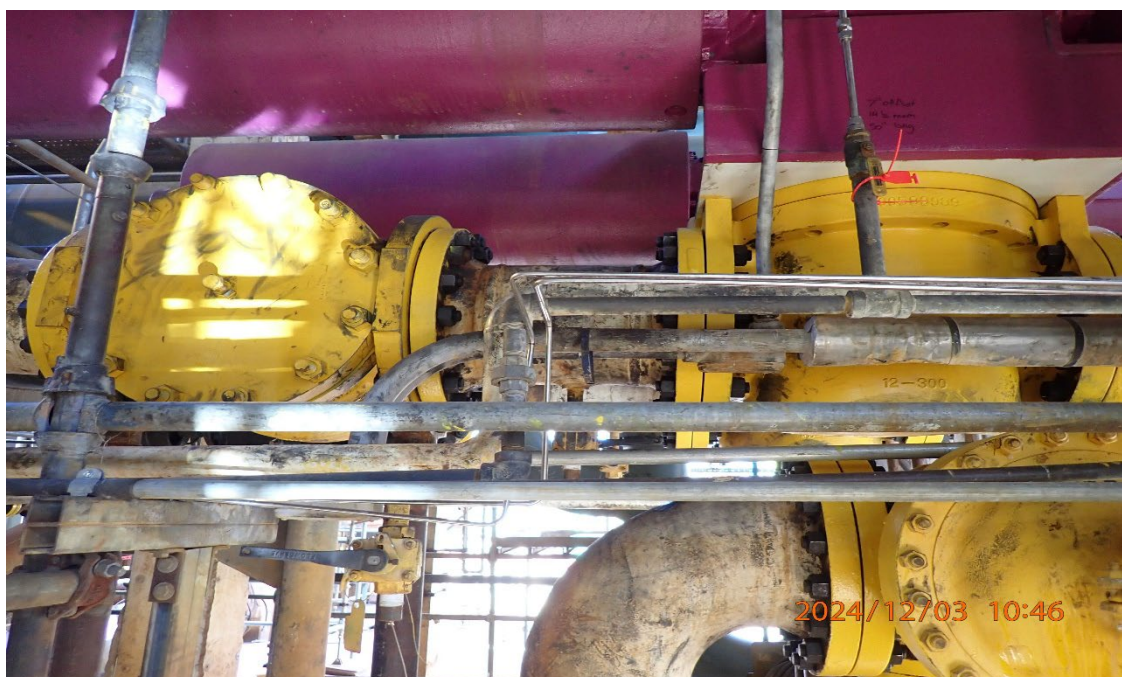
Attachment 4: Photograph Log



Photograph 24 - File: PC030037.JPG

HF acid sample station (back) and eyewash/safety shower (front) in the Alky Unit.

Attachment 4: Photograph Log



Photograph 25 - File: PC030038.JPG

E7904C HF acid cooler dump valve (79HV202) (right) and block valve (left) in the Alky Unit.



Photograph 26 - File: PC030039.JPG

E7904C HF acid cooler and boot with acid rerun emergency block valve (EBV) 79EBV7906

Attachment 4: Photograph Log



Photograph 27 - File: PC030040.JPG
Acid rerun pump in the Alky Unit.

Attachment 5

Signed Document Review/Request List



DOCUMENT REVIEW/REQUEST LIST
U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 6

Clean Air Act § 112(r) General Duty Clause (GDC) and Risk Management Program (RMP)

DATE/TIME:
December 2 to 5, 2024

FACILITY NAME:
Chalmette Refining, L.L.C.

LEAD INSPECTOR (NAME, ADDRESS, PHONE):
Anthony Gaglione

FACILITY ADDRESS:
500 West Saint Bernard Highway
Post Office Box 1007
Chalmette, Louisiana 70044

The following documents were reviewed and/or requested during the inspection unless indicate otherwise. If none of the boxes in the table are checked, the document was only reviewed onsite by the inspection team.

Item No.	Document Request Date	Document Description	Reviewed Prior to Site Visit	Provided for Onsite Review	Send a Copy to EPA for Offsite Review
1	12/5/2024	Applicability determination of hydrodesulfurization (HDS) unit, including supporting data and calculations.	☐	☐	☒
2	12/5/2024	Any policies or procedures that govern the management of fatigue of personnel and any fatigue studies conducted within the last 5 years of operations and maintenance personnel.	☐	☐	☒
3	12/5/2024	Crosswalk of PSMS Administrators to personnel positions.	☐	☐	☒
4	12/5/2024	Maximum intended inventory data and calculations of RMP regulated substances stored within railcars detached from motive force on site.	☐	☐	☒
5	12/5/2024	Process flow diagrams of all loading racks used for transfer of RMP regulated substances showing connections to light end and LPG storage.	☐	☐	☒
6	12/5/2024	Refinery block flow diagram	☐	☐	☒
7	12/5/2024	Relief system design and design basis for: a) 79PSV109 b) 79PSV191A c) 79PSV191B d) 78PSV912 e) 78PSV913	☐	☐	☒
8	12/5/2024	Emergency Shutdown (ESD) Sheets for the Safety Instrumented Systems (SISs) in the Alky Unit, other than the AES.	☐	☐	☒
9	12/5/2024	Updated progress status in IMPACT of the following 2019 Alky PHA Action Items: a) IMPACT #318450 b) IMPACT #318236	☐	☐	☒



DOCUMENT REVIEW/REQUEST LIST
U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 6

Clean Air Act § 112(r) General Duty Clause (GDC) and Risk Management Program (RMP)

DATE/TIME: December 2 to 5, 2024	FACILITY NAME: Chalmette Refining, L.L.C.
LEAD INSPECTOR (NAME, ADDRESS, PHONE): Anthony Gaglione	FACILITY ADDRESS: 500 West Saint Bernard Highway Post Office Box 1007 Chalmette, Louisiana 70044

The following documents were reviewed and/or requested during the inspection unless indicate otherwise. If none of the boxes in the table are checked, the document was only reviewed onsite by the inspection team.

Item No.	Document Request Date	Document Description	Reviewed Prior to Site Visit	Provided for Onsite Review	Send a Copy to EPA for Offsite Review
10	12/5/2024	Updated progress status in IMPACT of the following 2018 FCC PHA Action Items: a) IMPACT #298813 b) IMPACT #298817 c) IMPACT #298819	☐	☐	☒
11	12/5/2024	Documentation and justification of the rejection of the following findings from the 2018 FCC PHA: a) Finding #5 (IMPACT #298763) b) Finding #12 (IMPACT #298858)	☐	☐	☒
12	12/5/2024	GLOB-NP-0006 – version with fixed header block	☐	☐	☒
13	12/5/2024	GLOB-NP-0006 Attachment 6	☐	☐	☒
14	12/5/2024	Alky Unit procedure for taking a manual acid sample on the acid rerun line using the new sample station.	☐	☐	☒
15	12/5/2024	FCC procedure FCC-NP-7103 Pre-Shutdown Checklist	☐	☐	☒
16	12/5/2024	FCC procedure FCC-NP-7301 Shut Down Fluid Catalytic Cracker	☐	☐	☒
17	12/5/2024	FCC procedure FCC-NP-7331 Shut Down Fluid Catalytic Cracker - Hot Shut Down	☐	☐	☒
18	12/5/2024	Documentation of completion of refresher training for all Alky operators in Shift #1: most recent and previous rounds of refresher training.	☐	☐	☒
19	12/5/2024	Documentation of completion of refresher training for all FCCU operators in Shift #4: most recent and previous rounds of refresher training.	☐	☐	☒
20	12/5/2024	Documentation of most recent and previous refresher training for all current qualified machinists.	☐	☐	☒



DOCUMENT REVIEW/REQUEST LIST
U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 6

Clean Air Act § 112(r) General Duty Clause (GDC) and Risk Management Program (RMP)

DATE/TIME: December 2 to 5, 2024	FACILITY NAME: Chalmette Refining, L.L.C.
LEAD INSPECTOR (NAME, ADDRESS, PHONE): Anthony Gaglione	FACILITY ADDRESS: 500 West Saint Bernard Highway Post Office Box 1007 Chalmette, Louisiana 70044

The following documents were reviewed and/or requested during the inspection unless indicate otherwise. If none of the boxes in the table are checked, the document was only reviewed onsite by the inspection team.

Item No.	Document Request Date	Document Description	Reviewed Prior to Site Visit	Provided for Onsite Review	Send a Copy to EPA for Offsite Review
21	12/5/2024	Alky Unit pressure vessel internal inspections, most recent and previous, for: a) Acid Evacuation Drum (C7956) b) Depropanizer Overhead Accumulator (C7910) c) Isostripper Overhead Accumulator (C7921)	☐	☐	☒
22	12/5/2024	Alky Unit pressure vessel external visual and thickness inspection, most recent and previous, for: a) Acid Evacuation Drum (C7956) b) Depropanizer Overhead Accumulator (C7910) c) Isostripper Overhead Accumulator (C7921)	☐	☐	☒
23	12/5/2024	Alky Unit piping external visual and NDE inspection, most recent and previous inspections, for: a) Piping circuit for acid circulation piping between the E-7904 A/B/C/D coolers and the G-7903/04 pumps. b) Piping circuit for HF Stripper (C7909) bottoms to E-7919.	☐	☐	☒
24	12/5/2024	Alky Unit mechanical integrity documentation that identifies any remaining high residual element (RE) carbon steel installed in unit.	☐	☐	☒
25	12/5/2024	Most recently reviewed and revalidated corrosion control document for the Alky Unit.	☐	☐	☒
26	12/5/2024	Alky Unit documentation, including any findings and IWRs, from weekly testing of fire monitors (water test and movement test) from most recent 4 weekly tests.	☐	☐	☒
27	12/5/2024	Alky Unit documentation, including any findings and IWRs, from the most recently completed inspection and testing of the AED and Settler water curtains.	☐	☐	☒
28	12/5/2024	Alky Unit documentation, including any findings and IWRs, from the most recently conducted test of the AES.	☐	☐	☒



DOCUMENT REVIEW/REQUEST LIST
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Region 6

Clean Air Act § 112(r) General Duty Clause (GDC) and Risk Management Program (RMP)

DATE/TIME:
December 2 to 5, 2024

FACILITY NAME:
Chalmette Refining, L.L.C.

LEAD INSPECTOR (NAME, ADDRESS, PHONE):
Anthony Gaglione

FACILITY ADDRESS:
500 West Saint Bernard Highway
Post Office Box 1007
Chalmette, Louisiana 70044

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Item No.	Document Request Date	Document Description	Reviewed Prior to Site Visit	Provided for Onsite Review	Send a Copy to EPA for Offsite Review
29	12/5/2024	Alky Unit documentation, including any findings and IWRs, from the most recent open path (line of sight) HF detector testing/calibration.	☐	☐	☒
30	12/5/2024	Alky Unit documentation, including any findings and IWRs, from the most recent HF point detector testing/calibration for point detectors: a) #1 b) #7 c) #16 d) #18 e) #23 f) #25	☐	☐	☒
31	12/5/2024	FCC Unit pressure vessel internal inspections, most recent and previous, for: a) Fractionator overhead accumulator (C7808)	☐	☐	☒
32	12/5/2024	FCC Unit pressure vessel external visual and thickness inspections, most recent and previous, for: a) Fractionator overhead accumulator (C7808)	☐	☐	☒
33	12/5/2024	FCCU Unit documentation of inspections and repairs and replacements of slide valves 78HV104, 78HV105, 78HV106 conducted during most recent turnaround.	☐	☐	☒
34	12/5/2024	Alky Unit MOC packages, including MOC forms, approvals, and attachments, for the following MOC's: a) IMPACT # 50026 b) IMPACT # 61923 c) IMPACT # 51848 d) IMPACT # 52423 e) IMPACT # 53051 f) IMPACT # 57054 g) IMPACT # 62182 h) IMPACT # 54114	☐	☐	☒



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DATE/TIME:

December 2 to 5, 2024

FACILITY NAME:

Chalmette Refining, L.L.C.

LEAD INSPECTOR (NAME, ADDRESS, PHONE):

Anthony Gaglione

FACILITY ADDRESS:

500 West Saint Bernard Highway

Post Office Box 1007

Chalmette, Louisiana 70044

The following documents were reviewed and/or requested during the inspection unless indicate otherwise. If none of the boxes in the table are checked, the document was only reviewed onsite by the inspection team.

Item No.	Document Request Date	Document Description	Reviewed Prior to Site Visit	Provided for Onsite Review	Send a Copy to EPA for Offsite Review
35	12/5/2024	FCC Unit MOC packages, including MOC forms, approvals, and attachments, for the following MOC's: a) IMPACT # 53926 b) MOC for 2018 PHA Finding #8 (PHA Action Item IMPACT #298813)	☐	☐	☒
36	12/5/2024	Documentation of the final resolution for the following 2019 compliance audit findings: a) Action Item # 369161 b) Action Item # 369163 c) Action Item # 369642 d) Action Item # 369645	☐	☐	☒
37	12/5/2024	Documentation of the final resolution for the following 2022 compliance audit findings: a) Action Item # 459798 b) Action Item # 369646 c) Action Item # 459797	☐	☐	☒
38	12/5/2024	Documentation of the most recent performance evaluation of the contractor Acuren.	☐	☐	☒

INSPECTOR SIGNATURE

RECIPIENT SIGNATURE

NAME:

Anthony Gaglione

NAME:

Katherine Bergeron

TITLE:

Inspector

DATE SIGNED:

12/5/2024

TITLE:

HSE manager

DATE SIGNED:

12/5/2024