



**Region 6 - Enforcement & Compliance Assurance Division**  
**INSPECTION REPORT**

|                                        |                                                    |                          |
|----------------------------------------|----------------------------------------------------|--------------------------|
| Inspection Date(s):                    | 04/13/2022                                         |                          |
| Media Program:                         | Air                                                |                          |
| Regulatory Program(s)                  | Title V                                            |                          |
| Company Name:                          | <b>Eagle US 2 LLC, a Westlake Chemical Company</b> |                          |
| Facility Name:                         | <b>Lake Charles South - Eagle</b>                  |                          |
| Facility Physical Location:            | 1300 PPG Drive                                     |                          |
| (city, state, zip code)                | Westlake, Louisiana 70669                          |                          |
| Mailing address:                       | 1300 PPG Drive                                     |                          |
| (city, state, zip code)                | Westlake, Louisiana 70669                          |                          |
| County/Parish:                         | Calcasieu Parish                                   |                          |
| Facility Phone Number                  | 337-708-4688                                       |                          |
| Facility Contact:                      | Paula McCain                                       | Environmental Manager    |
|                                        | pmccain@westlake.com                               |                          |
| FRS Number:                            | 110000494894                                       |                          |
| Identification/Permit Number:          | AI No. 1255/2040-V9                                |                          |
| Media Identifier Number:               | LA0000002201900004                                 |                          |
| NAICS:                                 | 325181, 325199                                     |                          |
| SIC:                                   | 2869                                               |                          |
| Personnel participating in inspection: |                                                    |                          |
| Nicholas Bobbs                         | EPA/OECA/OCE/AED                                   | Inspector                |
| Richard Helmich                        | EPA/OECA/OCEFT/NEIC                                | Chemist                  |
| Agustin Martinez                       | EPA/OECA/OCEFT/NEIC                                | Technician               |
| Ali Gitipour                           | EPA/ORD/CEMM/AMCD                                  | Physical Scientist       |
| Elena Mayard                           | LDEQ/OEC/SD                                        | Inspector                |
| Paula McCain                           | Westlake Chemical                                  | Environmental Manager    |
| Don Johnson                            | Westlake Chemical                                  | Environmental Specialist |
|                                        |                                                    |                          |
|                                        |                                                    |                          |
|                                        |                                                    |                          |
|                                        |                                                    |                          |
| EPA Lead Inspector<br>Signature/Date   |                                                    |                          |
|                                        | {Inspector name}                                   | Date                     |
| Supervisor<br>Signature/Date           |                                                    |                          |
|                                        | {Supervisor name}                                  | Date                     |

## Section I – INTRODUCTION

### PURPOSE OF THE INSPECTION

EPA inspectors Richard Helmich, Agustin Martinez, Ali Gitipour, and I, Nicholas Bobbs, and LDEQ inspector Elena Mayard (“We”, “Us”) arrived at Eagle US 2 LLC/Lake Charles South (the “Facility”, the “Site”, or “WLCS”) at 8:00 AM on April 13, 2022 for an unannounced Clean Air Act (“CAA”) inspection. We met with Paula McCain, Environmental Manager, and Don Johnson, Environmental Specialist. I presented my credentials to Mrs. McCain and informed her that this was an EPA inspection to determine compliance with the facility’s Title V Air Permit and the Clean Air Act. The scope of the inspection is a partial compliance evaluation (“PCE”) including a survey of the facility using the Geospatial Measurement of Air Pollutants (“GMAP”) Vehicle. This inspection occurred as part of the Administrator’s Multi-Scale Monitoring Project called the Pollution Accountability Team (PAT).

### FACILITY DESCRIPTION

The Lake Charles South facility is owned and operated by Eagle US 2 LLC, which is wholly owned by parent company Westlake Chemical. The facility is a chemical manufacturing facility which produces chlorine, caustics, chlorinated derivatives, and solvents, along with other chemicals.

## Section II – OBSERVATIONS

The GMAP surveyed the entire facility. The complete GMAP data can be found in the GMAP R6 Pollution Accountability Team FY2022 report for the April 2022 GMAP project.

### Plant A

The GMAP detected elevated VOCs near the halogenated hydrocarbon tank farm. [AOC 1] I recorded FLIR video MOV\_0157 of VOC emissions coming from the area of the tank farm. I recorded FLIR video MOV\_0158 of VOC emissions coming from the stack of the Plant A Powerhouse. It is unknown if the GMAP detections were due to emissions from the Plant A Powerhouse or a source in the halogenated hydrocarbon tank farm.

### Plant B

The GMAP detected elevated concentrations of VOCs on Ave H, downwind of the “Per Tri” process area. [AOC 2]

### Plant C

The GMAP detected elevated concentrations of methane downwind of the natural gas breakout south of Plant C. I recorded FLIR videos MOV\_0153, MOV\_0154, MOV\_0155 and MOV\_0156 at around 4:10 pm. Mr. Helmich recorded FLIR videos MOV\_0187 and MOV\_0188 at the same time. We observed several leaks using the FLIR GF320 cameras in the natural gas breakout, including leaks from wheel valves, pilot valves, and gages. [AOC 3] We identified the leaking components to the facility personnel.

**Section III – AREAS OF CONCERN**

EPA inspectors Richard Helmich, Agustin Martinez, Ali Gitipour, and I, Nicholas Bobbs, and LDEQ inspector Elena Mayard conducted a closing conference at Eagle US 2 LLC/Lake Charles South at 5:00 PM on April 14, 2022 for the inspection. During the closing conference, I reviewed the 3 Areas of Concern noted during the inspection.

**AOC 1 – Elevated VOCs downwind of Powerhouse A and halogenated hydrocarbons tank farm**

The GMAP detected elevated VOCs downwind of Powerhouse A and the halogenated hydrocarbons tank farm. OGI showed a significant VOC plume from the Powerhouse A stack. There may also be a source within the halogenated hydrocarbon tank farm that contributed to the GMAP detection.

**AOC 2 – Elevated VOCs downwind of Per Tri process area**

The GMAP detected elevated VOCs downwind of the Per Tri process area. Facility personnel told me that this process area appeared to have some maintenance activities being performed during the inspection.

**AOC 3 – Elevated methane downwind of Plant C natural gas pipeline breakout**

The GMAP detected elevated methane downwind of the natural gas pipeline breakout on the south end of Plant C. We observed several leaks with OGI from various valves in the breakout area. We identified the leaking components to the facility personnel and they started taking action to fix the leaking components.

**Section IV – FOLLOW UP**

No additional information was received by EPA after exiting the Facility on April 13, 2022.

**Section V – LIST OF APPENDICES**

Appendix 1 – Video Log – 8 FLIR videos taken 04/13/2022

## Appendix 1

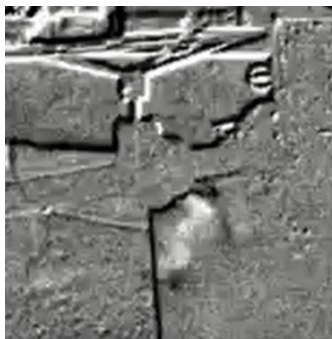
### Video Log



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Video Log

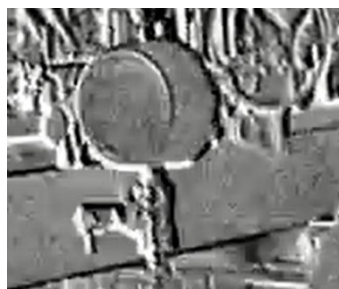
|                                                |                         |                         |
|------------------------------------------------|-------------------------|-------------------------|
| Location: <b>Westlake Chemical South Eagle</b> |                         |                         |
| City: <b>Westlake</b>                          | <b>Calcasieu Parish</b> | State: <b>Louisiana</b> |



File Name: MOV\_153.mp4  
 Date taken: 04/13/2022  
 Time taken: 4:10 pm  
 Videographer: Nicolas Bobbs  
 Description: OGI video of emissions from leaking components in Plant C



File Name: MOV\_154.mp4  
 Date taken: 04/13/2022  
 Time taken: 4:10 pm  
 Videographer: Nicholas Bobbs  
 Description: OGI video of emissions from leaking components in Plant C



File Name: MOV\_155.mp4  
 Date taken: 04/13/2022  
 Time taken: 4:10 pm  
 Videographer: Nicholas Bobbs  
 Description: OGI video of emissions from leaking components in Plant C



File Name: MOV\_156.mp4  
 Date taken: 04/13/2022  
 Time taken: 4:10 pm  
 Videographer: Nicholas Bobbs  
 Description: OGI video of emissions from leaking components in Plant C

File Name: MOV\_157.mp4



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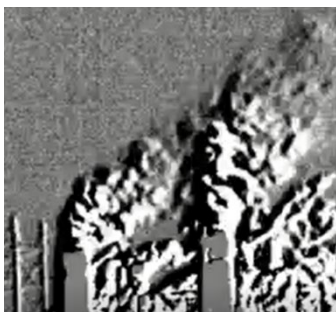
Appendix 1

## Video Log

|                                                |                         |                         |
|------------------------------------------------|-------------------------|-------------------------|
| Location: <b>Westlake Chemical South Eagle</b> |                         |                         |
| City: <b>Westlake</b>                          | <b>Calcasieu Parish</b> | State: <b>Louisiana</b> |



Date taken: 04/13/2022  
 Time taken: 9:00 am  
 Videographer: Nicolas Bobbs  
 Description: OGI video of emissions from area of the tank farm



File Name: MOV\_158.mp4  
 Date taken: 04/13/2022  
 Time taken: 9:30 am  
 Videographer: Nicholas Bobbs  
 Description: OGI video of emissions from the stack of power house A



File Name: MOV\_187.mp4  
 Date taken: 04/13/2022  
 Time taken: 4:10 pm  
 Videographer: Nicholas Bobbs  
 Description: OGI video of emissions from leaking components in Plant C



File Name: MOV\_188.mp4  
 Date taken: 04/13/2022  
 Time taken: 4:10 pm  
 Videographer: Nicholas Bobbs  
 Description: OGI video of emissions from leaking components in Plant C