

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	September 16-18, 2025	
Media Program:	Air	
Regulatory Program(s)	Clean Air Act (CAA) § 112(r) and 40 Code of Federal regulations (C.F.R.) Part 68 Chemical Accident Risk Management Plan (RMP)	
Company Name:	Pioneer Americas LLC d/b/a Olin Chlor Alkali	
Facility Name:	Olin Chlor Alkali	
Facility Physical Location:	4205 Highway 75	
(city, state, zip code)	St. Gabriel, Louisiana 70776	
Mailing address:	190 Carondelet Plaza, Suite 1530	
(city, state, zip code)	Clayton, Missouri 63105	
County/Parish:	Iberville	
Facility Phone Number	225-642-1800	
Facility Contact:		Plant Manager
FRS Number:	110056959073	
Identification/Permit Number:	N/A	
Media Identifier Number:	RMP 100000082457	
NAICS:	32518 – Other Basic Inorganic Chemical Manufacturing	
SIC:	2812	
Personnel participating in inspection:		
Elizabeth Pham	EPA Region 6	RMP Inspector
Aimee Boss	EPA Region 6	RMP Inspector
Glen Jenkins	LDEQ	LDEQ Inspector
Christopher Smith	LDEQ	LDEQ Inspector
	Olin	Plant Manager
	Olin	Production Manager
	Olin	Process Safety Manager
	Olin	Process Safety Technology Engineer
	Olin	Division EHS
	Olin	E/R and Sec. TXO
	Olin	Proc Safety Lead
	Olin	Global Process Safety
	Olin	MI Leader
EPA Lead Inspector Signature/Date		
	Elizabeth Pham	Date
Supervisor Signature/Date		
	Kayla Buchanan	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

United States Environmental Protection Agency (“EPA”) Region 6 inspectors, Elizabeth Pham (“I”) and Aimee Boss (“the EPA team”, “we”) and Louisiana Department of Environmental Quality (“LDEQ”) inspectors, Glen Jenkins and Christopher Smith, arrived at the Pioneer Americas LLC d/b/a Olin Chlor Alkali (“Olin”) facility, operated by Olin Chlor Alkali, in St. Gabriel, Louisiana at 9:30 AM on September 16, 2025. The EPA and LDEQ inspectors met with [REDACTED] (Plant Manager), and other Olin employees for an opening conference. I, Elizabeth Pham, presented my EPA inspector credentials and informed Olin personnel that this was an EPA inspection to evaluate compliance with the requirements of the Chemical Accident Prevention Provisions of Title 40 of the Code of Federal Regulations (C.F.R.) Part 68 under the Clean Air Act (CAA) § 112(r). An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 C.F.R. § 68.115, shall comply with the requirements of the C.F.R. Part 68. Employee representatives were invited to participate in the inspection. The facility does not have union representation.

FACILITY DESCRIPTION

Olin is located at 4205 Highway 75, St. Gabriel, Louisiana 70776. The facility is in operation 24 hours, 7 days of the week and has approximately one hundred seventeen (117) employees and sixty-five (65) nested contractors at the St. Gabriel location. The facility produces chlorine at the St. Gabriel site through a cell membrane room via electrolysis and supplies to their customers via pipeline or railcar. Olin stores more than the threshold quantity for the Risk Management Plan (“RMP”) regulated substance chlorine. Olin reported one (1) Program Level 3 covered process subject to the requirements of EPA’s RMP regulations in the most recent RMP submission dated November 23, 2021.

Section II - OBSERVATIONS

Subpart A – General

40 C.F.R. § 68.10 Applicability – Olin Chlor Alkali is the owner/operator of a stationary source that has more than a threshold quantity of the regulated substance chlorine, as listed in 40 C.F.R. § 68.130; therefore, the facility is subject to the Chemical Accident Prevention Provisions of Part 68. Olin is classified under the North American Industrial Classification System (“NAICS”) code 32518 (Other Basic Inorganic Chemical Manufacturing). The facility is also subject to the Occupational Safety and Health Administration (“OSHA”) process safety management (“PSM”) standard, 29 C.F.R. § 1910.119. The facility handles the listed RMP regulated toxic substance at or above the RMP threshold quantity.

40 C.F.R. § 68.12 General Requirements – Olin submitted their most recent 5-year RMP submission on November 23, 2021. The RMP listed one (1) chemical as present in processes with amounts greater than the threshold quantity, prescribed in the standard, and therefore classified as RMP Program 3 regulated substances by rule: Chlorine.

40 C.F.R. § 68.15 Management – Olin has developed a management system to oversee the implementation of the RMP program elements. The EPA team reviewed an organizational chart that satisfactorily documents the lines of authority and coverage of RMP program areas.

Subpart B – Hazard Assessment

40 C.F.R. § 68.20 Applicability – The facility is required to prepare an off-site consequence analysis and complete the five-year accident history. Olin has one (1) Program Level 3 process subject to this subpart.

40 C.F.R. § 68.22 Offsite Consequence Analysis Parameters – Olin uses 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 Worst-Case Release Scenario Analysis – Olin identified and analyzed the toxic worst-case scenario for chlorine, estimated to create the greatest distance to endpoint, resulting from an accidental release of the regulated toxic substance from a covered process under worst-case conditions.

40 C.F.R. § 68.28 Alternative Release Scenario Analysis – Olin identified and analyzed the alternative release scenario for chlorine held in the covered process. The alternate release scenario represents potential releases that are more likely to occur during the course of operation in the covered process areas.

40 C.F.R. § 68.30 Defining Offsite Impacts-Population – Olin estimated the population in their RMP for their worst-case scenario and alternative release determined by the distance to the endpoint. However, within their documentation, they failed to provide a definite population size for the offsite impacts.

[AOC #1 - 68.30 (c)].

40 C.F.R. § 68.33 Defining Offsite Impacts-Environment – Olin has identified environmental receptors in the OCA, as determined by the distance to endpoint using methods such as local U.S. Geological Survey (U.S.G.S.) maps. The worst-case release scenario reviewed onsite did not identify the Mississippi River or Bayou Braud as environmental receptors **[AOC #2 - 68.33(a)]**.

40 C.F.R. § 68.36 Review and Update – The worst-case release scenario reviewed onsite was from 2018 and was not reviewed and/or updated within 5 years **[AOC #3 - 68.36(a)]**.

40 C.F.R. § 68.39 Documentation – Olin operates one (1) RMP Program level 3 process subject to this subpart and is required to prepare a worst-case release scenario analysts and complete the five-year accident history. The EPA team reviewed the worst-case and alternative-case scenarios provided. Methodology and explanation of the parameters for the Offsite Consequence Analysis were documented as required by this subpart.

40 C.F.R. § 68.42 Five-year Accident History – The facility did not have any reportable accidents in the last five years. Olin had three (3) RMP-reportable accidental releases of regulated substance identified in their RMP. The accidents occurred on July 8, 2017, February 21, 2018, and June 18, 2018. For

information regarding incidents in the last five years, they can be reviewed under the Incident Investigation section of this report.

Subpart D – Program 3 Prevention Program

40 C.F.R. § 68.65 Process Safety Information – Olin maintains a variety of process safety information that describes the chemical hazards, operating parameters, and equipment designs associated with all covered processes. Olin compiled written process safety information, which includes information pertaining to the hazards of the regulated substance used or produced by the covered process, information pertaining to the technology of the process, and information pertaining to the equipment in the process.

The EPA team reviewed documentation pertaining to the hazards of the regulated substance in the process, including the Safety Data Sheet (SDS). The SDS contains information as required by this subpart.

The EPA team reviewed documentation concerning the technology of the covered processes, which included block flow diagrams, process chemistry, maximum intended inventory.

The EPA team reviewed documentation pertaining to the equipment of each process, including piping and instrumentation diagrams (P&IDs), electrical classification, the design bases, design codes and standards employed, and other safety systems. The P&ID for the covered process was missing information regarding the ‘Drawing Issue Record’, including missing signatures for certifying who it was drawn by, designed by, checked by, and approved by **[AOC #4 - 68.65(d)(1)(ii)]**.

40 C.F.R. § 68.67 Process Hazard Analysis (PHA) – We reviewed Olin’s PHA Policy and two most recent process hazard analyses: facility sitings conducted in 2019 and 2023 along with summary and closure reports in 2020 and 2024. Olin conducts periodic comprehensive studies to ensure that hazards associated with the covered process is identified, evaluated, and controlled effectively. The methodology used to carry out these analyses may include Hazard and Operability Studies (HAZOP), Layers of Protection Analysis (LOPA) checklists, and “what-if” analyses. The analyses conducted included participants with expertise in engineering and process operations. Section 7.0 of the 2024 PHA states “The 2024 PHA did not determine these considerations were needed.” This did not include a rationale, so it is unclear if Olin properly evaluated the recommendations from the 2023 facility siting and additional review is needed to ensure if previous 2019 facility siting was included in the PHAs **[AOC #5 - 68.67(c)(5)]**.

40 C.F.R. § 68.69 Operating Procedures – We reviewed Olin’s Operating Procedure Certification Policy along with the facility’s previous certifications for the last 5 years from 2020-2024. The facility must certify annually that the operating procedures are current and accurate, however, Olin certified the operating procedures on November 23, 2021 and then November 29, 2022 **[AOC #6 - 68.69(c)]**. In May 2024, the facility revised the policy and now requires the certifier to certify operating procedures for each department. For the November 26, 2024 certification, Olin was only able to provide one certification for the ‘Production Organization’ department, missing certifications for all other areas **[AOC #7 - 68.69(c)]**.

40 C.F.R. § 68.71 Training – Olin provided the EPA team with their Training Policy, Training Policy Addendum, and Operator Training Policy. Olin has implemented a training program for all employees involved in operating the process.

40 C.F.R. § 68.73 Mechanical Integrity (MI) – The EPA team reviewed the Mechanical Integrity Program Manual. Its intent is to provide a management system that helps Olin comply with internal and external requirements and recommendations. Olin uses established practices and procedures to maintain pressure vessels, storage tanks, heat exchangers, control systems, alarms, power systems, emergency shutdown systems, pumps, piping systems and piping components, relief valves and vent systems, compressors, blowers, and fans. The manual mentions that the required inspection for each piece of equipment that is covered by PM work orders is produced and scheduled through the plan maintenance computer software (“SAP”), however, the tracking system is now using the Olin Asset Integrity Standard (OASIS) and has not been updated in the manual [AOC #8 - 68.73(b)]. Specific inspection criteria are noted on Olin’s work orders denoting priority codes: 1-5. The requirements for those with a priority code 2 is said to address the recommendation before the next inspection or the item will become a priority code 1 noting ‘deficiency’. The EPA team reviewed multiple work orders on site and noted work orders reviewed for 2023 had items with priority code 2 but had not been addressed by the next inspection in 2024 and the priority code did not change to identify ‘deficiency’ [AOC #9 - 68.73(d)(3)]. On multiple work orders, there were photos of corrosion taken during the inspection, but the same photos were used for the inspection in following years [AOC #10 - 68.73 (d)(4)]. During EPA’s walkthrough of the facility, corrosion can be seen throughout the plant as documented in facility’s work order and inspections [AOC #11 - 68.73(e)]. Photos during the time of EPA’s inspection can be viewed in Appendix 1.

40 C.F.R. § 68.75 Management of Change (MOC) – The EPA team reviewed the Olin Management of Change (MOC) Work Process and Olin MOC Work Process Addendum for St. Gabriel policies. Olin uses OASIS to manage and track the status of changes to processes. Olin’s “Organizational Change Checklist” is required if the organizational change results in or could reasonably be expected to result in changes to process chemicals, technology, equipment procedures, or facilities of PSM covered processes. Olin provided a list of MOCs completed in the last three (3) years. The EPA team reviewed six (6) MOCs on this list.

40 C.F.R. § 68.77 Pre-startup Safety Review (PSSR) – The EPA team reviewed the Olin Pre-Startup Safety Review Policy and PSSR Work Process Addendum for St. Gabriel. All personnel that participate in PSSRs or authorize PSSRs must be trained on the PSSR requirements that apply to them initially and then at least on a three-year frequency. There are two forms in use: PSSR long forms are used for Level 3 Significance MOC and PSSR short forms are used for Level 1 or 2 Significance MOC. The PSSR Team Leader will initiate the PSSR and assemble to appropriate PSSR team to field review and inspect the process, project, or change. Training is provided in Olin’s Learning Management System called SABA utilizing the Level 2 MOC SABA training courses ‘UPSSR’. Olin provided the list of reviewers for the long form PSSR dated 8/30/25 for ‘Removing X-319 Bypass Valve’ and we identified one reviewer who was past due on their three-year training review [AOC #12 - 68.77(b)(4)]. For the short form PSSR dated 8/30/25 for ‘X607 to Elliot compressor’, there was a question about verifying if safety, operating,

maintenance, and emergency procedures are in place and affected personnel are trained with directions instructing that it must be answered affirmatively for all PSSRs. This question was marked as 'N/A' by the reviewer and facility stated that the reviewer had marked the question accurately [AOC #13 - 68.77(b)(2)].

40 C.F.R. § 68.79 Compliance Audits – The EPA team reviewed the facility's RMP Compliance Audit policy and the two most recent audit reports conducted on May 17-20, 2021 and April 22-25, 2024.. Training for auditors is maintained in SABA as a level 2 course record. The Olin compliance audits were conducted by at least one person knowledgeable in the process. There were five (5) findings in the 2021 Compliance Audit report and 14 findings in the 2024 Compliance Audit report. Upon review of the closure reports, we identified one (1) finding in the 2024 Closure Report that remained open at the time of inspection but was not overdue yet.

40 C.F.R. § 68.81 Incident Investigation – Olin provided a list of all incident investigations that have occurred at the facility in the last five (5) years and there were two (2) incidents with an investigation status marked as complete. Olin uses a root cause analysis (RCA) to identify the causes of an unplanned event or nonconformity and implement steps to prevent similar events from occurring. Of those reviewed, the incident investigation team consisted of at least one (1) person knowledgeable in the process involved. The EPA team reviewed an incident investigation report with an event date of November 17, 2024. There is a recommendation in the report marked open with a due date of December 31, 2025, but the status of the investigation is marked complete in the list of investigations [AOC #14 - 68.81(e)]. All RCA documents are uploaded to the Action Management Tool (AMT) and SABA is used for training.

40 C.F.R. § 68.83 Employee Participation – The EPA team reviewed the facility's Employee Participation policy as documentation of a written action plan outlining the responsibility for all employees to engage and actively participate in EH&S activities. Expectations for employee participation are covered during the new employee orientation and a PSM Operator Refresher Training Consultation is assigned in SABA for employees involved in operating an RMP covered process. Olin described that employees are given an anonymous training survey every two (2) years. This process is not described in the policy that was provided to the EPA team. Additional documents need to be requested.

40 C.F.R. § 68.85 Hot Work Permit – The EPA team reviewed the facility's Global Hot Work Standard and Addendum for St. Gabriel along with fourteen (14) Olin Safe Work Permits. According to the facility's work process, secondary approval is required for all 'High Energy' hot work in flammable areas. On all work permits reviewed, there is no secondary approver signature, as required, and some marked as not applicable although the category of hot work is marked high energy and the hot work permit was issued [AOC #15 - 68.85(a)]. On two (2) of the work permits, the initial time of the hot work permit was not filled in.

40 C.F.R. § 68.87 Contractors – Olin has procedures in place to ensure that contractors perform their work in a safe manner and are aware of the procedures to take during an emergency. Olin performs evaluations of contractors annually using Olin's third-party contractor verification provider, ISNetworld. It will review the contractor qualification data for approval, and the contractor is graded using the

grading criteria established in the Olin Division Contractor Management System. The EPA team reviewed the facility's Division Contractor Management System and St. Gabriel Addendum Procedure along with two (2) Contractor ORC Evaluation Forms. Additional documents may need to be requested to determine compliance with training requirements for this section.

Subpart E – Emergency Response

40 C.F.R. § 68.90 Applicability – Olin is designated as a responding stationary source and is subject to the requirements of 68.93 to 68.96.

40 C.F.R. § 68.93 Emergency Response Coordination Activities – Olin provided their Emergency Response Plan (ERP) document for EPA's review along with the last five (5) years of agency coordination and planning sheets. It is stated that the ERP is reviewed annually and updated when necessary changes need to be made. Detailed emergency response plans must be developed and coordinated with the Parish Local Emergency Planning Committee (LEPC) and the community's local response organization, the fire department. Olin has coordinated annually to meet with LA State Police, LEPC, Geismar Fire Department, and East Iberville Volunteer Fire Department to provide and review Olin ERP including response capabilities. Of the five (5) agency coordination and planning sheets, four of the sheets documented a coordination to review the facility's ERP and one of the sheets documented a coordination that occurred during a site event on April 4, 2024.

40 C.F.R. § 68.95 Emergency Response Program – Olin provided their Emergency Response Plan document, and the inspection and tests performed on its emergency response equipment for EPA's review. All Olin St. Gabriel employees are trained on the Emergency Response Plan (ERP), as well as their roles and responsibilities before, during, and after an emergency. Olin's Emergency Response Team members are trained to respond to various types of emergency situations including, but not limited to chemical releases, fires, and severe weather emergencies. Training requirements for personnel based on their intended roles include HAZWOPER, Incident Command, Confined Space Rescue, First Aid and Medical Responder training.

40 C.F.R. § 68.96 Emergency Response Exercises – Olin indicated that the facility has conducted emergency response drills in coordination with local emergency planning and response organizations. Olin provided a list of emergency response equipment and records of inspections for the last 3 years along with the 6 most recent eyewash and safety shower inspections.

Section III – AREAS OF CONCERN

AOC #1 - 40 C.F.R. § 68.30(c) Defining Offsite Impacts-Population

The owner or operator may use the most recent Census data, or other updated information, to estimate the population potentially affected.

Olin failed to identify the means used to determine population data to calculate the population numbers reported in their RMP.

AOC #2 - 40 C.F.R. § 68.33(a) Defining Offsite Impacts-Environment

The owner or operator shall list in the RMP environmental receptors within a circle with its center at the point of the release and a radius determined by the distance to the endpoint.

Olin failed to identify the Mississippi River or Bayou Braud as environmental receptors in their worst-case scenario.

AOC #3 - 40 C.F.R. § 68.36(a) Review and Update

The owner or operator shall review and update the offsite consequence analyses at least once every five years.

Olin failed to update the offsite consequence analysis every five years. The worst-case scenario reviewed was from 2018 and had not been updated.

AOC #4 - 40 C.F.R. § 68.65(d)(1)(ii) Process Safety Information

Information pertaining to the equipment in the process shall include piping and instrument diagrams (P&ID's).

Olin failed to ensure the P&ID's had certifying signatures indicating the P&ID is accurate and completed. The P&ID for the covered process was missing information regarding the 'Drawing Issue Record', including missing signatures for certifying who it was drawn by, designed by, checked by, and approved by.

AOC #5 - 40 C.F.R. § 68.67(c)(5) Process Hazard Analysis

The process hazard analysis shall address stationary source siting.

Olin failed to incorporate their 2023 facility siting into the 2024 PHA, it is unclear if Olin properly evaluated the recommendations.

AOC #6 - 40 C.F.R. § 68.69(c) Operating Procedures

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.

Olin failed to certify the operating procedures from 2021 to 2022. The certification from 2021 was certified on November 23, 2021. However, the certification form 2022 was a few days late and certified on November 29, 2022.

AOC #7 - 40 C.F.R. §68.69(c) Operating Procedures

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.

Olin failed to certify their operating procedures for all departments and only certified for the "Production Organization" department on November 26, 2024.

AOC #8 - 40 C.F.R. §68.73(b) Mechanical Integrity

The owner or operator shall establish and implement written procedures to maintain the on-going integrity of process equipment.

Olin failed to document changes to the software in the Mechanical Integrity Program. The Mechanical Integrity Program manual mentions that the required inspection for each piece of equipment that is covered by PM work orders is produced and scheduled through the plan maintenance computer software ("SAP"), however, the tracking system is now using the Olin Asset Integrity Standard (OASIS) and this software has not been updated in the manual.

AOC #9 - 40 CFR 68.73(d)(3) Mechanical Integrity

The frequency of inspections and tests of process equipment shall be consistent with applicable manufacturers' recommendations and good engineering practices, and more frequently if determined to be necessary by prior operating experience.

Olin failed to follow the facility's inspection criteria. Specific inspection criteria are noted on Olin's work orders denoting priority codes: 1-5. The requirements for those with a priority code 2 is said to address the recommendation before the next inspection or the item will become a priority code 1 noting 'deficiency'. The EPA team review multiple work orders on site and noted work orders reviewed for 2023 had items with priority code 2 but had not been addressed by the next inspection in 2024 and the priority code did not change to identify 'deficiency'.

AOC #10 - 40 CFR 68.73 (d)(4) Mechanical Integrity

The owner or operator shall document each inspection and test that has been performed on process equipment. The documentation shall identify the date of the inspection or test, the name of the person who performed the inspection or test, the serial number or other identifier of the equipment on which the inspection or test was performed, a description of the inspection or test performed, and the results of the inspection or test.

Olin failed to identify corrosion was mitigated. On multiple work orders, there were photos of corrosion taken during the inspection, but the same photos were used for the inspection in following years.

AOC #11 - 40 CFR 68.73(e) Mechanical Integrity

The owner or operator shall correct deficiencies in equipment that are outside acceptable limits before further use or in a safe and timely manner when necessary means are taken to assure safe operation.

Olin failed to correct deficiencies in equipment. During EPA's walkthrough of the facility, corrosion can be seen throughout the plant as documented in facility's work order and inspections from previous years.

AOC #12 - 40 C.F.R. §68.77(b)(4) Pre-startup Safety Review

The pre-startup safety review shall confirm that prior to the introduction of regulated substances to a process: Training of each employee involved in operating a process has been completed.

Olin failed to ensure training of an employee had been completed. An employee who was due on their three-year training review for "Removing X-319 Bypass Valve".

AOC #13 - 40 C.F.R. §68.77(b)(2) Pre-startup Safety Review

The pre-startup safety review shall confirm that prior to the introduction of regulated substances to a process: Safety, operating, maintenance, and emergency procedures are in place and are adequate.

Olin failed to follow their own documentation by answering "affirmatively". For the short form PSSR dated 8/30/25 for 'X607 to Elliot compressor', there was a question about verifying if safety, operating, maintenance, and emergency procedures are in place and affected personnel are trained with directions instructing that it must be answered affirmatively for all PSSRs. This question was marked as 'N/A' by the reviewer and facility stated that the reviewer had marked the question accurately.

AOC #14 - 40 C.F.R. §68.81(e) Incident Investigation

The owner or operator shall establish a system to promptly address and resolve the incident report findings and recommendations. Resolutions and corrective actions shall be documented.

Olin failed to ensure documentation of the incident investigation status is accurately reflected in the facility's records. The EPA team reviewed an incident investigation report "Investigation Summary – EV.SGAB.24.00116" with an event date of November 17, 2024. There is a recommendation in the report marked open with a due date of December 31, 2025, but the status of the investigation is marked complete in the list of investigations "Events with Required RCAs".

AOC #15 - 40 C.F.R. §68.85(a) Hot Work Permit

The owner or operator shall issue a hot work permit for hot work operations conducted on or near a covered process.

Olin failed to ensure hot work permits were filled out accurately. According to the facility's work process, secondary approval is required for all 'High Energy' hot work in flammable areas. On all work permits reviewed, there is no secondary approver signature, and some marked as not applicable although the category of hot work is marked high energy and the hot work permit was issued. Also, on two (2) of the work permits, the initial time of the hot work permit was not filled in.

Closing Conference

EPA Region 6 inspectors Elizabeth Pham and Aimee Boss conducted a closing conference at Pioneer Americas LLC d/b/a Olin Chlor Alkali at 3:15 PM on September 18, 2025, for the inspection. During the closing conference, I presented selected Areas of Concern (AOC) noted during the inspection, fielded questions from facility personnel, and provided information about the next steps in the inspection process. I indicated that there may be additional AOCs identified after all the documents EPA requested are received and reviewed.

Section IV – FOLLOW UP

No additional information was requested or received by EPA after exiting the Facility on September 18, 2025. All documents requested for EPA review were all uploaded by the Facility by October 3, 2025.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 32 photos taken 2/12/13

Appendix 1

Photograph Log

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Pioneer Americas LLC d/b/a Olin Chlor Alkali		
City: St. Gabriel	County/Parish: Iberville	State: Louisiana



Photo #:	IMG49758.jpg
Date:	9/17/2025
Camera:	CorDEX Toughpix Digitherm
Photographer:	Glen Jenkins
Witness:	Elizabeth Pham, Aimee Boss
Description: Corrosion and stains on storage tank T-906. Photo came out blurry.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Pioneer Americas LLC d/b/a Olin Chlor Alkali		
City: St. Gabriel	County/Parish: Iberville	State: Louisiana



Photo #:	IMG49759.jpg
Date:	9/17/2025
Camera:	CorDEX Toughpix Digitherm
Photographer:	Glen Jenkins
Witness:	Elizabeth Pham, Aimee Boss
Description: Corrosion and stains on storage tank T-906.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Pioneer Americas LLC d/b/a Olin Chlor Alkali		
City: St. Gabriel	County/Parish: Iberville	State: Louisiana



Photo #:	IMG49760.jpg
Date:	9/17/2025
Camera:	CorDEX Toughpix Digitherm
Photographer:	Glen Jenkins
Witness:	Elizabeth Pham, Aimee Boss
Description: Corrosion on chlorine cooler pneumatic valve.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Pioneer Americas LLC d/b/a Olin Chlor Alkali		
City: St. Gabriel	County/Parish: Iberville	State: Louisiana



Photo #:	IMG49761.jpg
Date:	9/17/2025
Camera:	CorDEX Toughpix Digitherm
Photographer:	Glen Jenkins
Witness:	Elizabeth Pham, Aimee Boss
Description: Corrosion on Chlorine cooler pneumatic valve.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 5

Location: Pioneer Americas LLC d/b/a Olin Chlor Alkali		
City: St. Gabriel	County/Parish: Iberville	State: Louisiana



Photo #:	IMG49762.jpg
Date:	9/17/2025
Camera:	CorDEX Toughpix Digitherm
Photographer:	Glen Jenkins
Witness:	Elizabeth Pham, Aimee Boss
Description: Sagging pipe behind the Elliot compressor.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Pioneer Americas LLC d/b/a Olin Chlor Alkali		
City: St. Gabriel	County/Parish: Iberville	State: Louisiana



Photo #:	IMG49763.jpg
Date:	9/17/2025
Camera:	CorDEX Toughpix Digitherm
Photographer:	Glen Jenkins
Witness:	Elizabeth Pham, Aimee Boss
Description: Corroded pipe just behind and to the left of box with blue label that reads "AI-307B H2 in Cl2 Outlet of X-311 A&B".	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Pioneer Americas LLC d/b/a Olin Chlor Alkali		
City: St. Gabriel	County/Parish: Iberville	State: Louisiana



Photo #:	IMG49764.jpg
Date:	9/17/2025
Camera:	CorDEX Toughpix Digitherm
Photographer:	Glen Jenkins
Witness:	Elizabeth Pham, Aimee Boss
Description: Corroded pipe just behind and to the left of box with blue label that reads "Al-307B H2 in Cl2 Outlet of X-311 A&B".	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Pioneer Americas LLC d/b/a Olin Chlor Alkali		
City: St. Gabriel	County/Parish: Iberville	State: Louisiana



Photo #:	IMG49765.jpg
Date:	9/17/2025
Camera:	CorDEX Toughpix Digitherm
Photographer:	Glen Jenkins
Witness:	Elizabeth Pham, Aimee Boss
Description: Corrosion on walkway supports above tank T-901G.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Pioneer Americas LLC d/b/a Olin Chlor Alkali		
City: St. Gabriel	County/Parish: Iberville	State: Louisiana



Photo #:	IMG49766.jpg
Date:	9/17/2025
Camera:	CorDEX Toughpix Digitherm
Photographer:	Glen Jenkins
Witness:	Elizabeth Pham, Aimee Boss
Description: Corrosion on walkway supports above tank T-901G.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Pioneer Americas LLC d/b/a Olin Chlor Alkali		
City: St. Gabriel	County/Parish: Iberville	State: Louisiana



Photo #:	IMG49767.jpg
Date:	9/17/2025
Camera:	CorDEX Toughpix Digitherm
Photographer:	Glen Jenkins
Witness:	Elizabeth Pham, Aimee Boss
Description: Corrosion on walkway supports above tank T-901F.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Pioneer Americas LLC d/b/a Olin Chlor Alkali		
City: St. Gabriel	County/Parish: Iberville	State: Louisiana



Photo #:	IMG49768.jpg
Date:	9/17/2025
Camera:	CorDEX Toughpix Digitherm
Photographer:	Glen Jenkins
Witness:	Elizabeth Pham, Aimee Boss
Description: Corrosion on valve flange.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Pioneer Americas LLC d/b/a Olin Chlor Alkali		
City: St. Gabriel	County/Parish: Iberville	State: Louisiana



Photo #:	IMG49769.jpg
Date:	9/17/2025
Camera:	CorDEX Toughpix Digitherm
Photographer:	Glen Jenkins
Witness:	Elizabeth Pham, Aimee Boss
Description: Corrosion on valve flange.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Pioneer Americas LLC d/b/a Olin Chlor Alkali		
City: St. Gabriel	County/Parish: Iberville	State: Louisiana



Photo #:	IMG49770.jpg
Date:	9/17/2025
Camera:	CorDEX Toughpix Digitherm
Photographer:	Glen Jenkins
Witness:	Elizabeth Pham, Aimee Boss
Description: Corrosion on valve flange.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: Pioneer Americas LLC d/b/a Olin Chlor Alkali		
City: St. Gabriel	County/Parish: Iberville	State: Louisiana



Photo #:	IMG49771.jpg
Date:	9/17/2025
Camera:	CorDEX Toughpix Digitherm
Photographer:	Glen Jenkins
Witness:	Elizabeth Pham, Aimee Boss
Description: Corrosion on walkway above tank T-901A.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: Pioneer Americas LLC d/b/a Olin Chlor Alkali		
City: St. Gabriel	County/Parish: Iberville	State: Louisiana



Photo #:	IMG49772.jpg
Date:	9/17/2025
Camera:	CorDEX Toughpix Digitherm
Photographer:	Glen Jenkins
Witness:	Elizabeth Pham, Aimee Boss
Description: Overview of Chlorine storage tanks.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: Pioneer Americas LLC d/b/a Olin Chlor Alkali		
City: St. Gabriel	County/Parish: Iberville	State: Louisiana



Photo #:	IMG49773.jpg
Date:	9/17/2025
Camera:	CorDEX Toughpix Digitherm
Photographer:	Glen Jenkins
Witness:	Elizabeth Pham, Aimee Boss
Description: Corrosion spot on the green pipe.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: Pioneer Americas LLC d/b/a Olin Chlor Alkali		
City: St. Gabriel	County/Parish: Iberville	State: Louisiana



Photo #:	IMG49774.jpg
Date:	9/17/2025
Camera:	CorDEX Toughpix Digitherm
Photographer:	Glen Jenkins
Witness:	Elizabeth Pham, Aimee Boss
Description: Corrosion on the yellow pipe support.	