

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	January 24-28, 2022	
Media Program:	Air	
Regulatory Program(s)	Clean Air Act Section 112(r) and 40 Code of Federal Regulations (C.F.R.) Part 68 Chemical Accident Prevention Provisions – Risk Management Program (RMP)	
Company Name:	Honeywell International Inc.	
Facility Name:	Honeywell International Inc., - Geismar Plant	
Facility Physical Location:	5525 Highway 3115	
(city, state, zip code)	Geismar, Louisiana 70034 (30.228335, -091.053827)	
Mailing address:	5525 Highway 3115	
(city, state, zip code)	Geismar, Louisiana 70034	
County/Parish:	Ascension	
Facility Phone Number	(973) 455-2000	
Facility Contact:	H. Jason Ayres	Sr. HSE Manager
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FRS Number:	110033659878	
Identification/Permit Number:	CAA Title V / Air Operating Permit ID: 0180-00003-V1	
Media Identifier Number:	1000 0008 5061 (EPA Facility ID)	
NAICS:	325199 (All Other Basic Organic Chemical Manufacturing) 32518 (Other Basic Inorganic Chemical Manufacturing) 32511 (Plastics Material and Resin Manufacturing)	
SIC:	2819 (Industrial Inorganic Chemicals); 2869 (Industrial Organic Chemicals)	
Personnel participating in inspection:		
Justin McDowell	US EPA Region 6	Inspector / Enforcement Officer
Howard Cole	US EPA Region 6	Inspector
Keri Meyers	LDEQ	Inspector
Bryn LeBlanc	LDEQ	Inspector
Glen Jenkins	LDEQ	Inspector
Jamie Vicknair	LDEQ	Inspector
Jason Ayres	Honeywell Geismar Plant	Sr. HSE Manager
Jim Hudson	Honeywell Geismar Plant	Plant Manager
Danny Sherman	Honeywell Geismar Plant	PSM Leader
EPA Lead Inspector Signature/Date		
	Justin McDowell	Date
Supervisor Signature/Date		
	Samuel Tates	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

United States Environmental Protection Agency (EPA) Region 6 inspectors Justin McDowell and Howard Cole, and the Louisiana Department of Environmental Quality (LDEQ) inspectors Keri Meyers, Bryn LeBlanc, Glen Jenkins, and Jamie Vicknair arrived at the Honeywell – Geismar Plant (Honeywell Geismar) at 10:00 on Monday January 24, 2022, for an announced inspection. I met with Jason Ayres, James Hudson, Danny Sherman, in addition to conference call participants for an opening meeting. I presented my credentials and informed Honeywell Geismar personnel that this was an EPA inspection to determine compliance with the federal Chemical Accident Prevention Program. The scope of the inspection was a partial compliance evaluation (PCE), which included an evaluation of the facility's compliance with the Clean Air Act (CAA) Section 112(r) and the Chemical Accident Prevention Provisions in 40 C.F.R. Part 68 and the General Duty Clause. On October 27, 2021, a plant worker was killed during an onsite chemical release accident of a regulated substance. Honeywell Geismar's Risk Management Plan (RMP) is listed as a Program Level Three (3), Title V facility. I inquired if an employee representative was available pursuant to section 112(r)(6)(L) of the CAA to participate in this inspection and was informed that the Honeywell Geismar plant is a non-union facility.

FACILITY DESCRIPTION

The Honeywell Geismar Plant is an inorganic acid, refrigerant and fluoropolymer resin manufacturing facility that has approximately 280 employees. The plant's products are used to make refrigerants, fluorocarbons, high octane gasoline, pharmaceutical films, foam insulation, and other chemical derivatives. Some of the regulated substances stored and used by the facility are hydrogen fluoride, oleum, chlorine, hydrogen chloride, trifluorochloroethylene, boron trifluoride, vinylidene fluoride, chloroform and other chemicals which are on the RMP Rule's list of regulated substances. The Honeywell Geismar Plant's storage and use of these substances exceeds the specified threshold quantities as defined by the EPA's RMP Rule.

Section II - OBSERVATIONS

On Wednesday January 26, 2022, EPA inspectors were accompanied by Honeywell Geismar personnel to conduct a driving tour of the entire plant, a detailed walking tour through each process unit; and operator interviews related to the October 21, 2021, accident, and other accidental releases. G-245fa and 1234YF process units were selected as a focus of the inspection.

Subpart A – General

40 C.F.R. § 68.10 Applicability – Honeywell Geismar is the owner/operator of a stationary source that has more than threshold quantities of five regulated toxic substances (Chloroform, Chlorine, Boron Trifluoride, Hydrogen fluoride/ Hydrofluoric acid, and Oleum) and two regulated flammable substances (Trifluorochloroethylene and Vinyl fluoride) in a covered process, as listed in 40 C.F.R. § 68.130, and, as such, is subject to the Chemical Accident Prevention Provisions. Honeywell has a Clean Air Act Title V permit and an Air Operating Permit ID: 0180-00003-V1 and is classified under the North American Industrial Classification System (NAICS) codes 32518 (Other Basic Inorganic Chemical Manufacturing), 325211 (Plastics Material and Resin Manufacturing) and 325199 (All Other Basic Organic Chemical

Manufacturing). Honeywell is subject to the Occupational Safety and Health Administration (OSHA) process safety management (PSM) standard, 29 C.F.R. § 1910.119, and has five Program Level Three (3) processes under OSHA PSM.

40 C.F.R. § 68.10 Program Eligibility – Honeywell Geismar re-submitted an RMP registration voluntary update on February 13, 2017. Honeywell's next registration e-submittal is due on February 13, 2022, unless an update or correction is required by 40 C.F.R. 68.190 or 40 C.F.R. 68.195 prior to the five-year renewal date.

40 C.F.R. § 68.12 General requirements – Honeywell Geismar's re-submitted RMP plan requires the facility to: develop and implement a management system; conduct a hazard assessment; implement the prevention requirements of 40 C.F.R § 68.65 - § 68.67; develop and implement an emergency response program; and include the data elements from 40 C.F.R §68.175 in their RMP.

40 C.F.R. § 68.15 Management – Honeywell Geismar developed a management system to oversee the implementation of risk management program elements; assigned a qualified person or position that has the overall responsibility for the development, implementation, and integration of the risk management program elements; and documented and the lines of authority defined through an organization chart or similar document.

Subpart B – Hazard Assessment

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

40 C.F.R. § 68.22 Offsite Consequence Analysis Parameters – Honeywell Geismar used RMP*Comp™ as the technique for modeling the release scenarios. For both the worst-case and alternative case scenarios involving toxics and flammables, the facility used the endpoints provided in Appendix A of 40 C.F.R. Part 68, appropriate wind speeds and stability classes, ambient temperatures and humidity values, values for height of the release, and surface roughness values for the release scenario analyses.

40 C.F.R. § 68.25 Worse-case Release Scenario Analysis – Honeywell Geismar analyzed and reported in the RMP one worst-case release scenario, estimated to create the greatest distance to endpoint, and resulting from an accidental release of a regulated toxic substance from a covered process under worst-case conditions and one worst-case release scenario, estimated to create the greatest distance to endpoint, and resulting from an accidental release of a regulated flammable substance from a covered process under worst-case conditions. The worst-case release quantity was determined as the greatest amount held in a single vessel, taking into account administrative controls that limit the maximum quantity released.

40 C.F.R. § 68.28 Alternative Release Scenario Analysis – Honeywell Geismar identified and analyzed six toxic alternative release scenarios and two alternative release scenarios to represent all flammable substances held in a covered process, using a scenario that is likely to occur.

40 C.F.R. § 68.30 Defining Offsite Impacts - Population – Honeywell Geismar uses the MARPLOT mapping program to define the affected off-site population. The documentation describes how the facility estimated the population that would be affected in the distance to endpoint in the RMP, based

on a circle with the point of release at the center. It also identified the presence of institutions, parks, and recreational areas, major commercial, office and industrial buildings in the RMP. The facility used the most recent Census data (estimated to two significant digits) in the documentation.

40 C.F.R. § 68.33 Defining Offsite Impacts - Environment – Honeywell Geismar identified environmental receptors within a circle where its center is the point of the release and a radius determined by the distance to endpoint. The plant relied on information provided on local United States Geographical Survey (U.S.G.S.) maps and data to identify environmental receptors.

40 C.F.R. § 68.36 Review and Update – Honeywell Geismar has not reviewed and updated the offsite consequence analyses at least once every five years. The last review and update of the offsite consequence analyses was completed May 2016, leading up to the RMP submittal on February 13, 2017. The 5-year mark would be May 2021. The next RMP submission is due February 13, 2022, and Honeywell intends to complete the analyses prior to. The facility stated that the process has not had any significant changes to alter the analyses. [AOC 1 – §68.36(a)]

40 C.F.R. § 68.39 Documentation – Honeywell Geismar failed to maintain records with the description of the vessel or pipeline used in the worst-case scenario, as well as the description of parameters used, specifically for the liquid temperature. [AOC 2 – §68.39(a)]

40 C.F.R. § 68.42 Five-year accident history – Honeywell Geismar has not included in the five-year accident history all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage. The March 29, 2020, accident is not listed in the RMP. This accident involved an operator clearing a transfer pump of Hydrofluoric acid to a refrigerant plant. While ensuring it was cleared of material, the material caused a burn to an operator's ear. There are two accidents upcoming that meet the criteria of § 68.42 that should be included such as September 28, 2021, and October 21, 2021. [AOC 3 – §68.42(a)]

Subpart D – Program 3 Prevention Program

40 C.F.R. § 68.65 Process Safety Information – Honeywell Geismar compiled written process safety information, which includes information pertaining to the hazards of the regulated substances used or produced by the process, information pertaining to the technology of the process, and information pertaining to the equipment in the process. I reviewed the Safety Data Sheets for the process chemicals that detailed process safety information was provided that contains the following data for the hazards of the substance used: toxicity information, permissible exposure limits, physical data, reactivity data, corrosivity data, thermal and chemical stability data, and the hazardous effects of inadvertent mixing of materials that could foreseeably occur. I reviewed documentation concerning the technology of the process, which included block flow diagrams, maximum intended inventory, safe upper and lower limits for such items as temperatures, pressures, flows, or compositions and an evaluation of the consequences of deviation. Honeywell provided documentation related to process chemistry for the G-245fa or 1234YF units. I reviewed documentation pertaining to the equipment of the process including materials of construction, piping and instrumentation diagrams (P&IDs), electrical classification, relief system design and design basis (PSV systems), ventilation system design, design codes and standards employed, material and energy balances, and safety systems (process interlocks, safety instrumentation systems – SIS, fire systems, deluge systems and LEL alarm systems).

40 C.F.R. § 68.67 Process hazard analysis (PHA) – Honeywell Geismar provided their PHA procedure. Honeywell performed initial PHAs that identified, evaluated, and controlled the hazards involved in the processes. The facility completes each PHA based on the five-year cycle from the previous PHA, as they are divided among the covered process units/ work areas. The PHAs performed use the Hazard and Operability Study (HAZOP) and Layers of Protection Analysis (LOPA) technologies to identify hazards. The PHAs reviewed (2021 and 2016 Apollo 1234YF and G-245fa units) addressed the hazards of the process; identification of any incident that had a likely potential for catastrophic consequences; engineering and administrative controls applicable to hazards and their interrelationships; consequences of failure of engineering and administrative controls; stationary source siting; human factors; and an qualitative evaluation of a range of the possible safety and health effects of failed controls. PHAs were performed by a team that consists of facility personnel. Honeywell failed to establish a system to promptly address the team's findings and recommendations; assure that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete actions as soon as possible; develop a written schedule of when these actions are to be completed; communicate the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions. The 2016 G-245fa unit PHA has action items open 17 PHA recommendations and the Apollo 1234YF unit PHA has one open recommendations. The 2016 PHAs reviewed also have recommendations completed past their target due dates. **[AOC 4 – §68.67(e)]** PHAs were revalidated at least every five years after the completion of the initial or previous PHA. Honeywell has retained the PHA updates or revalidations for each process covered, as well as the resolution of recommendations for the life of the process.

40 C.F.R. § 68.69 Operating Procedures – Honeywell Geismar developed and implemented written operating procedures that provide instructions or steps for conducting activities associated with each covered process, consistent with the safety information. Honeywell provided a list of Operating procedures used at the facility. The operating procedures I reviewed addressed steps for each operating phase, operating limits, safety and health considerations, and safety systems with their functions. Operating procedures are maintained online. Honeywell failed to certify annually that operating procedures are current and accurate for the HF unit (January 21, 2022, to December 23, 2020); the Aclon unit (January 20, 2021, to December 23, 2019) and the 245fr unit (December 10, 2021, to November 30, 2020). The procedure certifications were past due their annual certification date. **[AOC 5 – §68.69 (c)]** Honeywell developed and implemented safe work practices to provide for the control of hazards during operations such as lockout/tagout; confined space entry; opening process equipment or piping; and control over entrance into a stationary source by maintenance, contractor, laboratory, or other support personnel.

40 C.F.R. § 68.71 Training – Honeywell Geismar provided their Honeywell Geismar Operator Training, Certification, and Recertification QSOP-TRN-003 Revision 33 document, but it did not fully explain the training plan. Douglass Graham, from the Training Department, described the training plan was an initial two-week basic training that includes:

- Week 1: Basic Orientation (getting registered into the system); an entire day with safety to go over the site chemicals, hazards, and emergency procedure; a day with HSE and Medical; and safety driven computer-based training such as LOTO, safe work, hot work procedures.
- Week 2: basic operator computer base training on how different pieces of equipment work; and unit specific training which consists of a set of lesson plans that take anywhere from 2-5 days to complete depending on which unit an operator is assigned to. This class introduces unit specific chemicals and their hazards, overview of the process, etc.

After new operators complete the first two weeks of training, they are assigned an On-The-Job (OJT) Trainer. OJT Trainers are defined in the policy as Operators selected by management who are certified in the job/material they are instructing and have successfully completed an OJT training course. This training is 30 to 120 days (more if needed). There is an extensive checklist of items that needs to be completed. After completing the requirements and passing a 25-50 question test (with a score of 80% or better), operators receive their certification. This allows them to work without OJT oversight. Honeywell's recertification training did not meet the refresher training requirements of 68.71(b).

Mr. Alleman, from the Training Department, discussed what each unit does in order to recertify an operator. He stated that he brings the operators around the plant and makes them explain the purpose of the equipment, how it works, etc. In addition, he said they have to review the procedures annually. He said they do document which operators review which procedures. In the training records that were discussed as possible refresher trainings there were several examples of operator training/ sign-off sheets that were not dated or were missing operator names on the record. Some records indicate that a particular operator may not work in that unit area. [AOC 6 – §68.71(c)]

40 C.F.R. § 68.73 Mechanical Integrity – Honeywell Geismar did not ensure that the following inspections were performed in accordance with their mechanical integrity program. Honeywell failed to implement written procedures to maintain the on-going integrity of process equipment for fixed and rotation equipment. [AOC 7 – §68.73(b)] Inspections and tests were not performed on process equipment. E-202 had no records of an internal inspection since its installation in the 1234yf unit. This vessel has manufacture dates of 1993, 1994, and 1995. It was used in another unit and brought to 1234yf. E-206 had no records of an internal inspection having been performed since its installation in 1234yf. This vessel has manufacture dates of 9/1/2002. It was used in another unit and brought to 1234yf. [AOC 8 – §68.73(d)(1)] Honeywell failed to follow recognized and generally accepted good engineering practices related to ultrasonic testing (UT) and corrosion under insulation (CUI). [AOC 9 – §68.73(d)(2)] Honeywell failed to demonstrate that the frequency of inspections and tests of process equipment was consistent with applicable manufacturers' recommendations and good engineering practices, and more frequently if determined to be necessary by prior operating experience [AOC 10 – §68.73(d)(3)]. Honeywell's documentation of each inspection and test on process equipment did not include a description of the inspection or test performed and the results of the inspection or test [AOC 11 – §68.73(d)(4)]. Honeywell failed to ensure that appropriate checks and inspections were performed to assure that equipment is installed properly and consistent with design specifications and the manufacturer's instructions. [AOC 12 – §68.73(f)(2)] Honeywell failed to assure that maintenance materials, spare parts and equipment are suitable for the process application for which they will be used. [AOC 12 – §68.73(f)(3)]

40 C.F.R. § 68.75 Management of Change (MOC) – Honeywell Geismar established written procedures to manage changes to process chemicals, technology, equipment, procedures, and changes to stationary sources that affect a covered process. The procedures assured that the following considerations were addressed prior to any change: the technical basis for the proposed change; impact of change on safety and health; modifications to operating procedures; necessary time period for the change; and, authorization requirements for the proposed change. Honeywell provided a list of MOCs for review implementation of the selected MOCs.

40 C.F.R. § 68.77 Pre-startup Safety Review – Honeywell Geismar provided a "Pre-Start Up Safety Review Field Walk" form. For MOCs requested, it was not clear if the pre-startup safety review

confirmed that prior to the introduction of regulated substances to a process: (1) Construction and equipment is in accordance with design specifications; (2) Safety, operating, maintenance, and emergency procedures are in place and are adequate; (3) For new stationary sources, a process hazard analysis has been performed and recommendations have been resolved or implemented before startup; and modified stationary sources meet the requirements contained in management of change, and (4) Training of each employee involved in operating a process has been completed.

40 C.F.R. § 68.79 Compliance Audits – Honeywell Geismar certified that they evaluated compliance with the provisions of this subpart at least every three years to verify that procedures and practices developed under this subpart are adequate and are being followed in its two most recent reports completed on September 18-22, 2017, and September 14-25, 2020. The audit teams consisted of Honeywell personnel and a third-party contractor. Honeywell failed to promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies were corrected. The 2017 audit had findings repeated on the 2020 audit. **[AOC 13 – §68.79(d)]**

40 C.F.R. § 68.81 Incident Investigation – Honeywell Geismar investigated each incident which resulted in, or could reasonably have resulted in a catastrophic release. One incident was initiated more than 48 hours following the incident: 351252. (Figure 1) **[AOC 14 – §68.81(b)]**. One incident did not show documentation of involving the contractor during the investigation when the contractor was, or possibly could have been, impacted: Incident # 318087 on 2/5/2021. **[AOC 15 – §68.81(c)]** The following incidents did not promptly address and resolved the incidents and document resolutions and corrective actions: 329413, 334083, 335477 and 350353. (Figure 2) **[AOC 16 – §68.81 (e)]** The following incidents did not provide documentation that they were reviewed with all affected personnel whose job tasks are relevant to the incident: Incident #212833 – 01/14/2019; Incident # 222480 – 04/05/2019; Incident #227214- 04/29/2019; Incident # 235325 – 06/06/2019; Incident # 236498 – 06/11/2019; Incident #237161-06/03/2019; Incident #238050- 05/29/2019; Incident #257631 – 08/24/2019; Incident #271402 – 01/10/2020; Incident #310809- 12/28/2020; Incident #329413 – 5/6/21; Incident #330956 – 5/18/21; Incident #345466 – 8/28/21; Incident #349732 – 9/16/21; Incident # 350353 – 9/28/21; and Incident #356376 – 11/11/21. **[AOC 17 – §68.81(f)]**

Figure 1

Incident	Date	Date Investigation Began	
351252	10/1/21	10/4/2021	started more than 48 hours after the incident occurred

Figure 2

Incident	Incident Date	Resolution
329413	5/6/21	Target completion dates given for action items. Says “Closed” but no completion dates given or what was done to close.
334083	6/4/21	Long Term Corrective Action #1 (Honeywell inspectors to inspect the liner damage) had a due date of 6/23/2021 but was not completed until 7/7/2021.

335477	6/14/21	Target completion dates given for action items. Says “Closed” but no completion dates given or what was done to close.
350353	9/28/21	Target completion dates given for action items. Says “Closed” but no completion dates given or what was done to close.

40 C.F.R. § 68.83 Employee Participation – Honeywell Geismar developed a written plan of action regarding the implementation of the employee participation required by this section, which is integrated into the program elements. Honeywell did not consult with employees and their representatives on the development of training as it pertains to process safety management in the chemical accident prevention provisions. The ERP plan discusses training in regard to emergency response training and not the required operator training. *Training: Emergency brigade members attend quarterly training to maintain their level of proficiency. Whereas the medical responders attend annual training to maintain their level of proficiency and state certification.* This has nothing to do with training requirements within the Prevention program. **[AOC 18 – §68.83(b)]**

40 C.F.R. § 68.85 Hot Work Permit – Honeywell Geismar provided their hot work procedure that detailed guidance for hot work that generates an external flame or spark. I reviewed several hot work permits that involved an external flame or spark in the process area. The permits reviewed documented that fire prevention requirements were implemented, as well as the dates authorized for hot work and the object(s) upon which hot work would be performed.

40 C.F.R. § 68.87 Contractors – Honeywell Geismar uses the *ISNetWorld* contractor database to evaluate information regarding contractor’s safety performance and programs. All contractors must have a minimum grade or an approved variance to be permitted to work onsite. All contractors report to the Safety Alliance to received Basic Plus and site-specific training prior to gaining access to work onsite. The Safety Alliance provides contractors who successfully completed training a badge card that is valid for one year to gain entry to the site. Honeywell runs monthly reports on *ISNetWorld* for contractor status reports.

Subpart E – Emergency Response

40 C.F.R. § 68.90 Applicability – Honeywell Geismar is designated as a “responding stationary source”.

40 C.F.R. § 68.93 Emergency Response Coordination Activities – Honeywell Geismar coordinated response needs with local emergency planning and response organizations to determine how the covered processes at the facility are addressed in the emergency response plan. The facility provided documentation of coordination with the Ascension Parish LEPC and the Iberville Parish Local Emergency Planning Committee (LEPC) due to the site’s proximity to the Mississippi River.

40 C.F.R. § 68.95 Emergency Response Program – Honeywell Geismar developed and implemented an emergency response program for the purpose of protecting public health and the environment. All emergency responders are required to have basic ER training including 40-hour HAZMAT and refresher. Two nurses work onsite five days/week. CAER sends notifications in the event of an accidental release when mutual aid may be needed. The program includes the following elements: (1) An emergency response plan, which shall be maintained at the stationary source and contain at least the following elements: (i) Procedures for informing the public and the appropriate federal, state, and local

emergency response agencies about accidental releases via the code red system; (ii) Documentation of proper first-aid and emergency medical treatment necessary to treat accidental human exposures via SDSs; and (iii) Procedures and measures for emergency response after an accidental release of a regulated substance via the code red system; (2) Procedures for the use of emergency response equipment and for its inspection, testing, and maintenance; (3) Training for all employees in relevant procedures; and (4) Procedures to review and update, as appropriate, the emergency response plan to reflect changes at the stationary source and ensure that employees are informed of changes.

40 C.F.R. § 68.96 Emergency Response Exercises – Honeywell Geismar conducts monthly and quarterly meetings/ drills with the Local Emergency Planning Committee.

Subpart G – Risk Management Plan (RMP)

40 C.F.R. § 68.190 Updates – Honeywell Geismar’s RMP was last re-submitted on February 13, 2017.

40 C.F.R. § 68.195 Required corrections – Honeywell Geismar next RMP registration re-submission is due by February 13, 2022, unless an update or correction is required by 40 C.F.R. 68.190 or 40 C.F.R. 68.195 prior to the five-year renewal deadline.

Section III – AREAS OF CONCERN

AOC 1 – 40 C.F.R §68.36 (a) Hazard Assessment

“(a) The owner or operator shall review and update the offsite consequence analyses at least once every five years.”

The last review and update of the offsite consequence analyses was completed May 2016, leading up to the RMP submittal on February 13, 2017. The 5-year mark would be May 2021. The next RMP submission is due February 13, 2022, and Honeywell intends to complete the analyses prior to. The facility stated that the process has not had any significant changes to alter the analyses.

AOC 2 – 40 C.F.R §68.39 (a) Documentation

“(a) For worst-case scenarios, a description of the vessel or pipeline and substance selected as worst case, assumptions and parameters used, and the rationale for selection; assumptions shall include use of any administrative controls and any passive mitigation that were assumed to limit the quantity that could be released. Documentation shall include the anticipated effect of the controls and mitigation on the release quantity and rate.”

Honeywell Geismar failed to maintain records with the description of the vessel or pipeline used in the worst-case scenario, as well as the description of parameters used, specifically for the liquid temperature.

AOC 3 – 40 C.F.R §68.42 Five-year accident history/ §68.195 (a) Required corrections

“(a) The owner or operator shall include in the five-year accident history all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage.”

“New accident history information – For any accidental release meeting the five-year accident history reporting criteria of § 68.42 and occurring after April 9, 2004, the owner or operator shall submit the data required under §§ 68.168, 68.170(j), and 68.175(l) with respect to that accident within six months of the release or by the time the RMP is updated under § 68.190, whichever is earlier.”

The March 29, 2020, accident is not listed in the RMP. This accident involved an operator clearing a transfer pump of Hydrofluoric acid to a refrigerant plant. While ensuring it was cleared of material, the material caused a burn to operator’s ear. There are other accidents upcoming that meet the criteria of § 68.42 that should be included such as September 28, 2021, and October 21, 2021.

AOC 4 – 40 C.F.R §68.67 (e) Process Hazard Analysis

“(c) The owner or operator shall establish a system to promptly address the team’s findings and recommendations; assure that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete actions as soon as possible; develop a written schedule of when these actions are to be completed; communicate the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions.”

The 2016 G-245fa unit PHA has 17 open PHA recommendations and the Apollo 1234YF unit has one open recommendation. The 2016 PHAs reviewed also have recommendations completed past their target due dates.

AOC 5 – 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.

Honeywell failed to certify **annually** that operating procedures are current and accurate for the HF unit (January 21, 2022, to December 23, 2020); the Aclon unit (January 20, 2021 to December 23, 2019) and the 245fr unit (December 10, 2021 to November 30, 2020). The procedure certifications were past due their annual certification date.

AOC 6 – 40 C.F.R §68.71 (c) Training

Training documentation. The owner or operator shall ascertain that each employee involved in operating a process has received and understood the training required by this paragraph. The owner or

operator shall prepare a record which contains the identity of the employee, the date of training, and the means used to verify that the employee understood the training.

Mr. Alleman came in to discuss what each unit does in order to recertify an operator. He stated that he brings the operators around the plant and makes them explain the purpose of the equipment, how it works, etc. In addition, he said they have to review the procedures annually. He said they do document which operators review which procedures but did not provide documentation for recertifications. This should be documented to ensure an operator has received and understood the training given. In the unofficial training records that were discussed as possible refresher trainings there were several examples of operator training/ sign-off sheets that were not dated or No name and No date on the record. Some records were also complete that may indicate that particular operator may not work in that unit area.

AOC 7 – 40 C.F.R §68.73 (b) Mechanical Integrity

(b) *Written procedures.* The owner or operator shall establish and implement written procedures to maintain the on-going integrity of process equipment.”

Honeywell did not ensure that the following inspections were performed in accordance with their mechanical integrity program. Internal visual inspections are required every 10 years.

1. R-6100A Honeywell did not ensure that an internal inspection was conducted by September 2021.
2. R-6100B Honeywell did not ensure that an internal inspection was performed on R6100B by March 8, 2021; the last internal inspection was conducted March 8, 2011.
3. R-6100D Honeywell did not ensure that an internal inspection was performed on R6100D by July 2018; the last internal inspection was conducted July 29, 2008.
4. R-6100E Honeywell did not ensure that an internal inspection has been performed; there is no history of an internal inspection ever being performed.

Honeywell failed to implement written procedures to maintain the on-going integrity of process equipment:

1. CUI Inspections.
2. Vessel inspections are not being implemented in accordance with the ITPM001 procedure or the vessel inspection plans in DMAPS.
 - a. Annual visual inspections are being performed without thickness testing. ITPM001 states that 1-year external inspections shall include thickness testing for vessels in HF service. Thickness testing is set on separate intervals within the vessel inspection plan in DMAPS, which contradicts requirements in ITPM001.
 - b. U-7216 has internal inspections set to a seven (7) year frequency within DMAPS; however, ITPM001 states that internal inspections are not to exceed five (5) years based on favorable inspection results for vessels in HF service.
 - c. Many vessels have their internal inspections set to a two (2) or three (3) year interval within DMAPS; however, ITPM001 sets this interval to five years based on favorable inspection results for vessels in HF service. ITPM001 directly contradicts the specific vessel inspection plans in DMAPS.

3. SOP-MNT-404 is not being implemented for pump vibration inspection records in AMS suite for the following: P-6110 A and B; P-6112 B; and P-6118 A.
4. API 510 thickness examinations for anomalies.

Deficiencies were found in rotation equipment.

For P6118A, the pump was not running, and the in-line spare was being tested for the vibration route PM; however, AMS suite had no notes that this pump was not in-service and therefore would not be tested for February through June of 2021 routes.

Section 5.3.1 of SOP-MNT-404 requires that if a piece of equipment is not running when a vibration route is taken, this piece of equipment shall be recorded as so in the data collector and can be skipped until the next vibration route is conducted. By not having the note in AMS to indicate that P6118A was not running at the time the vibration route was taken for those months in 2021, Honeywell's procedure (SOP-MNT-404) failed to be implemented.

P6118 A and P6118B were not tested for vibration in July, September, or December of 2021 and there was no note in AMS suite that both these pumps were down. SOP-MNT-404 section 5.3.1 failed to be implemented in these cases.

P6110A was not running, and the in-line spare was being tested for vibration route, but AMS suite had no notes that pump A was not in service for May, August, and December 2021. SOP-MNT-404 section 5.3.1 failed to be implemented in these cases.

P6110B was not running, and the in-line spare was being tested for vibration route, but AMS suite had no notes that pump B was not in service for February through April of 2021; June and July of 2021; and for September 2021. SOP-MNT-404 section 5.3.1 failed to be implemented in these cases.

P6112B was not running, and the in-line spare was being tested for vibration route, but AMS suite had no notes that pump B was not in service for February 2021; and May through September of 2021. SOP-MNT-404 section 5.3.1 failed to be implemented in these cases.

AOC 8 – 40 C.F.R §68.73 (d)(1) Mechanical Integrity

(d) *Inspection and testing.* (1) Inspections and tests shall be performed on process equipment.

1234yf (Apollo) Unit:

1. E-202 had no records of an internal inspection having been performed since its installation in 1234yf. This vessel has manufacture dates of 1993, 1994, and 1995. It was used in another unit and brought to 1234yf.
2. E-206 had no records of an internal inspection having been performed since its installation in 1234yf. This vessel has manufacture dates of 9/1/2002. It was used in another unit and brought to 1234yf.

AOC 9 – 40 C.F.R §68.73 (d)(2) Mechanical Integrity

(d) *Inspection and testing.* (2) Inspection and testing procedures shall follow recognized and generally accepted good engineering practices.

1. Honeywell conducted ultrasonic testing (UT) on pressure vessel **U-6112** in 2013 and the results indicated that the metal thickness of a nozzle (N-17) on this vessel had experienced a 66% metal wall loss at the testing location. The following retirement dates were calculated:

TML 99- retirement thickness date: 9/19/2014

TML 100- retirement thickness date: 6/23/2014

TML 101- retirement thickness date: 5/10/2014

TML 102- retirement thickness date: 5/7/2014

Honeywell conducted additional ultrasonic testing on this nozzle (N-17) on June 16, 2014, September 20, 2017, and September 22, 2021, and the results indicated that the metal thickness of this nozzle continued to experience a 66% metal wall loss at testing locations 99, 100, 101, and 102. Honeywell failed to properly calculate the corrosion rates, the remaining life, and next inspection intervals to determine the limiting component and failed to perform additional testing in 2018, 2019, and 2020 based on the remaining life as established in 2013 in accordance with API 510 Section 6.5 and Section 5.6.2.1.

2. Honeywell conducted ultrasonic testing on pressure vessel **T-6110** on May 17, 2019, and the results indicated that the metal thickness of this vessel had experienced a 41%-49% metal loss at testing locations 139, 140, 141, and 142. Honeywell failed to properly calculate the corrosion rates, the remaining life, and next inspection intervals to determine the limiting component in accordance with API 510 Section 5.6.2.1.

3. Following ultrasonic testing conducted on December 16, 2017, on **T-6210**, Honeywell failed to perform additional testing on the shell of the vessel by January 2018 for TML 20 when the remaining life is less than four years in accordance with API 510 Section 6.5.

4. Following ultrasonic testing conducted on February 16, 2018, on **T-6210**, Honeywell failed to perform additional testing on the shell of the vessel by January 2018 for TML 9, June 2018 for TML 72, and February 2019 for TML 104 when the remaining life is less than four years in accordance with API 510 Section 6.5.

5. Following ultrasonic testing conducted on February 6, 2019, on **T-6300**, Honeywell failed to perform additional testing on the shell of the vessel by April 2020 for TML 37, 38, and 39 when the remaining life is less than four years in accordance with API 510 Section 6.5.

6. Honeywell conducted ultrasonic testing on March 19, 2018, on pressure vessel **R-6100D** and the results indicated a nozzle N-02 (9, 10, 11, 12) had experienced a 66% metal loss in metal thickness upon testing. Honeywell failed to conduct further testing on this nozzle at the three-year interval as is required by their Inspection and Test Plan or one-half the remaining life of the vessel in accordance with API 510 Section 6.5.

7. Corrosion Under Insulation (CUI)

Honeywell failed to develop and implement a corrosion under insulation inspection program to address the visual condition of the external covering, insulation damage, and evidence of fluid leakage and stains which are factors in CUI in accordance with API 510 Section 5.5.6 and API 583, As an example, external visual inspection reports indicated the following assessments.

T-6200- Insulation bad-CUI possible, staining observed, insulation damage staining and deterioration observed throughout the tank, 2 nozzles have leak boxes, discoloration

T-6205- insulation minor damage and discoloration, warped in spots

U-6112-staining present throughout tank and fasteners, staining throughout tank, staining throughout shell and heads

T-6210- shell and heads rusting and staining, insulation with staining and minor damage, damaged insulation

T-6110- staining and discoloration minor damage throughout, fasteners have staining, damaged insulation on third and fourth deck.

8. Honeywell failed to utilize API 510 certified inspectors for vessel internal inspections as well as vessel external and thickness inspection results. This was observed across all vessels selected for review in units 245fa and 1234yf. For vessel E-6101A, the person utilized (J. Maller) for the thickness and visual inspection had "no certifications" listed within the physical report for either a certified inspector or examiner/technician.

The following pressure vessels were operated beyond their due date without a valid deferral (per API 510):

Equipment	Inspection Due Date	Deferral Request Date	Approved
U-140	12/9/2021	1/18/2022	No
U-1201	9/26/2021	12/2/2021	No
R-200	10/12/2021	11/16/2021	Approval after due date
R-201	10/12/2021	11/16/2021	Approval after due date
R-202	10/12/2021	11/16/2021	Approval after due date
R-203	10/12/2021	11/16/2021	Approval after due date
E-206	10/12/2021	11/16/2021	Approval after due date
U-1310	10/12/2021	11/16/2021	Approval after due date
U-7294	10/12/2021	11/12/2021	Approval after due date
E-202	10/12/2021	11/16/2021	Approval after due date
U-205C	05/27/2021	06/15/2021	Approval after due date

Honeywell failed to conduct external visual inspections of piping every five-years as is required by API 570 Section 6.3.3; and Honeywell failed to conduct external visual inspections annually as is required by the Honeywell Inspection and Test Plan for each piping circuit.

Piping Circuit	Last Visual Inspection Dates	Prior Inspection Date	Chemical
PRM-08703	August 12, 2021	September 4, 2019 August 13, 2020	Chlorine
PRC-10203	December 7, 2021	None	HF, HCL
PJH-06114	October 23, 2021	None	Anhydrous HF
PJH-06115	October 23, 2021	None	Anhydrous HF
PJH-06116	October 23, 2021	None	Anhydrous HF
PJH-07722	October 23, 2021	None	Anhydrous HF
PJ-06102	October 20, 2021	None	Anhydrous HF
PJ-06103	October 20, 2021	None	Anhydrous HF
PJ-11202	February 25, 2021	February 20, 2019 February 27, 2020	Anhydrous HF
PJH-06109	October 23, 2021	None	Anhydrous HF

U.S. EPA would consider anhydrous hydrogen flouride, hydrogen fluoride, and chlorine as Class 1 chemicals.

2a. Honeywell had not conducted piping thickness measurements inspections every 5 years (Class 1) or 10 years (Class 2) in accordance with: Table 1—Recommended Maximum Inspection Intervals, for the following piping circuits:

2b. Honeywell failed to establish the corrosion rate and remaining life calculations, and next due inspection in accordance with “API 6.3.3(a) Setting Inspection Intervals Without the Use of RBI”.

2c. Honeywell failed to comply with the Inspection and Test Plan for thickness monitoring which requires piping circuit thickness monitoring every two years.

Piping Circuit	Thickness Monitoring Inspection Date	Previous Monitoring	Chemical
PRM-08703	September 21, 2021	September 4, 2019	Chlorine
PRC-10203	December 7, 2021	None	HF, HCL
PJH-06114	None	None	Anhydrous HF
PJH-06115	None	None	Anhydrous HF
PJH-06116	None	None	Anhydrous HF
PJH-07722	None	None	Anhydrous HF
PJ-06102	October 20, 2021	None	Anhydrous HF
PJ-06103	October 20, 2021	None	Anhydrous HF
PJ-11202	March 3, 2021	February 20, 2019	Anhydrous HF
PJH-06109	None	None	Anhydrous HF
PJH-06113	None	None	

Honeywell failed to conduct external visual inspections, which included an examination of flanged joints prior to October 20, 2021, as is required by API 570 Section 5.15.

Prior to October 20, 2021, flange joints on the following piping circuits were not evaluated for evidence of leakage, such as stains, deposits, process leaks or drips and a visual examination of flange fasteners for corrosion and thread engagement was not performed.

Piping Circuit	Last Visual Inspection Dates	Prior Inspection Date	Chemical
PRC-10203	December 7, 2021	None	HF, HCL
PJH-06114	October 23, 2021	None	Anhydrous HF
PJH-06115	October 23, 2021	None	Anhydrous HF
PJH-06116	October 23, 2021	None	Anhydrous HF
PJH-07722	October 23, 2021	None	Anhydrous HF
PJ-06102	October 20, 2021	None	Anhydrous HF
PJ-06103	October 20, 2021	None	Anhydrous HF
PJH-06109	October 23, 2021	None	Anhydrous HF

Honeywell’s inspecting and testing of pressure relief valve PSV-6105C00, protecting pressure vessel T-6105C, containing HF, HCL, Chlorine, Organics, surpassed five years, therefore exceeding the required time interval of for inspection of API 510 Section 6.6.3.

Pressure Vessel	Pressure Relief Valve	Last Inspection Date	Required Inspection Date
T-6105C	PSV-6105C00	April 16, 2015	April 16, 2020

AOC 10 – 40 C.F.R §68.73 (d)(3) Mechanical Integrity

(d) Inspection and testing. (3) 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.

1234yf (Apollo) Unit:

1. E-211 had a baseline internal inspection performed on 7/17/2019; however, this was not done at the frequency identified in the ITPM001 procedure. Baselines are required to be conducted after 1 year of service. This unit went into service in October 2016, which set the internal to be conducted in October 2017. The baseline internal inspection was performed two (2) years late.
2. U-7216 had external and internal visual inspections performed late based on what the previous inspection had set.
3. U-300 had two (2) annual visual inspections missed, which were for 2017 and 2018.
4. E-202 had external visual and thickness measurements performed late in 2021 based on what the previous inspection had set.

245fa Unit:

1. P-6118B had Equipment Lubrication Route inspections performed three (3) months late in 2019, two (2) months late in 2020, and missed an inspection in 2021. The Equipment Lubrication Route is set to an interval of twelve (12) months.
2. P-6118A had an Equipment Lubrication Route inspection performed two (2) months late in 2021. The Equipment Lubrication Route is set to an interval of twelve (12) months.
3. E-6202 had external visual, thickness measurements, and internal inspections performed late based on what the previous inspection had set. Annual visual inspections were missed for four (4) consecutive years between 3/19/2015 and 2/7/2020.
4. E-6111 had annual visual inspections missed for four (4) consecutive years between 3/2/2015 and 4/14/2020.
5. E-6101B had an external thickness measurement taken on 6/2/2014 where two (2) CML points were identified with a remaining life of 2.2 years. Given API 510 requires that the next inspection be at ½ the remaining life if below 10 years, the next inspection was required reduced to 1.1 years per RAGAGEP. The inspection was kept on a 2-year frequency. Those same CML points had a remaining life of 2.1 years during the next inspection on 5/24/2016, which also required the interval to be reduced to ½ remaining life to follow RAGAGEP; however, it was kept on a 2-year frequency again. New CML points were identified on the 12/16/2020 inspection to have a remaining life of 2.8 years; thus, the interval needed to be shortened to 1 year and five (5) months for the next thickness reading. This was kept on a 2-year frequency. This vessel also had several thickness measurements performed late based on what the previous inspection had set.

Honeywell failed to calculate the appropriate next due inspection date and retirement thickness date on the March 3, 2021, ultrasonic testing report for TMLs 3 and 4.

E-6100A has an inspection plan set in the DMAP file provided to EPA and LDEQ inspectors on-site for the vessel. The inspection plan sets external visual inspection (VT) and ultrasonic thickness (UT) inspection

frequencies to every two (2) years, unless frequency needs to be reduced based on API inspector findings.

*Please also note that the ITPM001 Equipment Reliability Standard sets external inspection frequencies, both UT and VT, for pressure vessels in HF service to a frequency of 1 year. The inspection plan in DMAP for these vessels prescribed two-year intervals for this type of inspection, which goes against this policy; however, the frequency set by the inspectors in the DMAP inspection file for each vessel assigns the 1-year interval that aligns with ITPM001. This one-year interval was not being met for this vessel.

The following inspections did not meet that frequency –

- External VT was one (1) year and eleven (11) months late for the 12/14/2020 inspection. The previous VT inspection was performed 1/23/2018, and the API inspector, J. Bryant, noted the next VT due on 1/23/2019 within the DMAP file. This frequency was not met because the inspection was not performed until 12/14/2020, which was one (1) year and eleven (11) months after the assigned due date.
- External VT was one (1) year late for the 1/23/2018 inspection. The previous VT inspection was performed on 1/28/2016, and the inspector, J. Bourgeois, noted the next VT due on 1/28/2017 within the DMAP file. This frequency was not met because the VT inspection wasn't performed until 1/23/2018, which was one (1) year after the assigned due date.
- External VT was eleven (11) months late for the 1/28/2016 inspection. The previous VT inspection was performed on 2/11/2014, and the API inspector, M. Wells, noted the next VT due on 2/11/2015 within the DMAP inspection file. This frequency was not met because the VT inspection was not performed until 1/28/2016, which was eleven (11) months after the assigned due date.
- External UT was eight (8) months late for the 2/11/2014 inspection. The previous VT inspection was performed 6/21/2011, and the inspector, D. Whitehead, noted the next UT due on 6/21/2013 (this is at the two-year interval per the inspection plan, but goes against the ITPM interval of one year). This frequency was not met because the VT inspection was not performed until 2/11/2014, which was eight (8) months after the assigned two-year due date, but also two (2) years and four (4) months late per the ITPM frequency of 1 year.
- Other UT readings were meeting the two-year frequency assigned in the inspection plan DMAP file, but this does not meet the frequency set in ITPM.

AOC 11 – 40 C.F.R §68.73 (d)(4) Mechanical Integrity

(d) Inspection and testing. (4) 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.

Honeywell's documentation of each inspection and test on process equipment did not include a description of the inspection or test performed and the results of the inspection or test.

1. External visual inspection performed on T-6110 on March 18, 2019, did not include a description of the inspection or test performed and the results of the inspection or test.

2. External visual inspections performed on T-6205 on March 4, 2021, did not include a description of the inspection or test performed and the results of the inspection or test.

AOC 12 – 40 C.F.R §68.73 (f)(2) / (f)(3) Mechanical Integrity

(f)(2) Quality assurance. (2) Appropriate checks and inspections shall be performed to assure that equipment is installed properly and consistent with design specifications and the manufacturer's instructions.

And

(f)(3) The owner or operator shall assure that maintenance materials, **spare parts** and equipment are suitable for the process application for which they will be used.

Honeywell purchased aftermarket (and not original equipment manufacturer (OEM)) support trays for installation in pressure vessels T-7305B and T-7305C. These support trays failed during operation resulting in the release of approximately 268.31 lbs. of hydrogen fluoride on October 24, 2020 and 9.17 pounds of hydrogen fluoride on November 24, 2020. The failure of the support trays was attributed to a design flaw which allowed the support trays to be fabricated with sharp angles rather than arcs.

AOC 13 – 40 C.F.R §68.79 (d) Compliance Audits

“(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 2017 audit had findings repeated on the 2020 audit.

AOC 14 – 40 C.F.R §68.81 (b) Incident Investigations

“(b) An incident investigation shall be initiated as promptly as possible, but not later than 48 hours following the incident.”

The following incident was initiated more than 48 hours following the incident: 351252. The incident date was October 1, 2021, and the investigation began on October 4, 2021.

AOC 15 – 40 C.F.R §68.81 (c) Incident Investigations

“(c) An incident investigation team shall be established and consist of at least one person knowledgeable in the process involved, including a contract employee if the incident involved work of the contractor, and other persons with appropriate knowledge and experience to thoroughly investigate and analyze the incident.”

One incident did not show documentation of involving the contractor during the investigation when the contractor was, or possibly could have been, impacted: Incident # 318087 2/5/2021.

AOC 16 – 40 C.F.R §68.81 (e) Incident Investigations

“(c) 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.”

The following incidents did not promptly address and resolved the incidents and document resolutions and corrective actions: 329413, 334083, 335477 and 350353.

AOC 17 – 40 C.F.R §68.81 (f) Incident Investigations

“(f) The report shall be reviewed with all affected personnel whose job tasks are relevant to the incident findings including contract employees where applicable.”

The following incidents did not provide documentation that they were reviewed with all affected personnel whose job tasks are relevant to the incident: Incident #212833 – 01/14/2019; Incident # 222480 – 04/05/2019; Incident #227214- 04/29/2019; Incident # 235325 – 06/06/2019; Incident # 236498 – 06/11/2019; Incident #237161-06/03/2019; Incident #238050- 05/29/2019; Incident #257631 – 08/24/2019; Incident #271402 – 01/10/2020; Incident #310809- 12/28/2020; Incident #329413 – 5/6/21; Incident #330956 – 5/18/21; Incident #345466 – 8/28/21; Incident #349732 – 9/16/21; Incident # 350353 – 9/28/21; and Incident #356376 – 11/11/21.

AOC 18 – 40 C.F.R §68.83 (b) Employee Participation

“(b) The owner or operator shall consult with employees and their representatives on the conduct and development of process hazards analyses and on the development of the other elements of process safety management in this rule.”

Honeywell did not consult with employees and their representatives on the conduction and development of training as it pertains to process safety management in the chemical accident prevention provisions.

AOC 19 – 112(r)(1) of the CAA, 42 U.S.C. § 7412(r)(1) General Duty Clause

“Section 112(r)(1) of the CAA, 42 U.S.C. § 7412(r)(1), otherwise known as the “General Duty Clause” states the following:

“(r) Prevention of Accidental Releases (1) Purpose and General Duty – It shall be the objective of the regulations and programs authorized under this subsection to prevent the accidental release and to minimize the consequences of any such release of any substance listed pursuant to paragraph (3) or any other extremely hazardous substance. The owners and operators of stationary sources producing, processing, handling or storing such substances have a general duty, in the same manner and to the

same extent as section 654, title 29 of the United States Code, to identify hazards which may result from such releases using appropriate hazard assessment techniques, to design and maintain a safe facility taking such steps as are necessary to prevent releases, and to minimize the consequences of accidental release which do occur.”

On October 21, 2021, a plant worker was killed during an onsite chemical release accident of a regulated substance. The facility had a release of hydrofluoric acid in the 245FA process unit. A Honeywell employee was exposed to the HF and sustained fatal injuries. The release point occurred at a gasket on a flange on a block valve.

EPA Region 6 inspectors Justin McDowell and Howard Cole conducted a closing conference at Honeywell Geismar at 5PM on January 28, 2022, for the inspection. During the closing conference, EPA and LDEQ inspectors reviewed the Areas of Concern noted during the inspection.

Section IV – FOLLOW UP

The following information was received by EPA on February 7, 2022, after exiting the Facility on January 28, 2022:

1. RE: Honeywell Document Log Request Mechanical Integrity 1-25-2022.docx – Received January 28, 2022
2. Honeywell Document Request Inspection and Testing Piping Circuits, PSV – Received January 28, 2022
3. Honeywell Document Request – Received January 27, 2022
4. Draft Inspection Report Responses- April 1, 2022

Section V – LIST OF APPENDICES

N/A