Inspection Date(s):	04/28/2025 – 05/02/2025	
Media Program:	Air	
Regulatory Program(s)	Clean Air Act Section 112(r) and 40 Code of Federal Regulations (C.F.R.) Part 68 Chemical Accident Prevention Provisions – Risk Management Program (RMP)	
Company Name:	**INEOS Group LTD**	
Facility Name:	**INEOS O&P USA LLC – Battleground Manufacturing**	
Facility Physical Location:	1230 Independence Parkway South	
(city, state, zip code)	La Porte, Texas 77571	
Mailing address:	(same as above)	
(city, state, zip code)	(same as above)	
County/Parish:	Harris County	
Facility Contact:	Rosy Novo	BMC PSIM Team Lead
	Rosa.novo@ineos.com	
FRS Number:	1100 3870 5817	
Identification/Permit Number:	N/A	
Media Identifier Number:	1000 0008 4534	
NAICS:	325211 – Plastics Material and Resin Manufacturing	
SIC:	N/A	
Personnel participating in inspection:		
Sherronda Phelps	US EPA Region 6	CAA RMP Inspector
William Steiner	INEOS	PSM Manager
Chock Ganapathy	INEOS	SSHE Manager
EPA Lead Inspector Signature/Date	Sherronda Phelps	06/27/2025
	Sherronda Phelps	Date
Acting Supervisor Signature/Date	KAYLA BUCHANAN Digitally signed by KAYLA BUCHANAN Date: 2025.07.08 16:30:15 -05'00'	
	Kayla Buchanan	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector, Sherronda Phelps, (I) arrived at the INEOS facility at 9:00 AM on April 28th for an announced inspection. I was met by Rosy Novo (BMC PSIM Team Lead) and other INEOS representatives at the Opening Conference. I presented my credentials to Mrs. Novo and INEOS representatives at the Opening Conference and informed them that this was an EPA inspection focused on the implementation of and compliance (PCE), which included an evaluation of the facility's compliance with the Clean Air Act (CAA) Section 112(r), the Chemical Accident Prevention Provisions in 40 C.F.R. Part 68.

FACILITY DESCRIPTION

As stated from the Executive Summary in INEOS's Risk Management Plan, INEOS Battleground Manufacturing Complex (BMC) is comprised of multiple polyethylene facilities and a propylene facility. The polyethylene facility manufactures polyethylene for a wide variety of industrial and consumer application. The manufacturing process uses ethylene as the basic building block for producing polyethylene. The regulated substances above the threshold quantity within the polyethylene facility include ethylene, isobutane and propane.

Section II - OBSERVATIONS

The initial documentation review began on-site with INEOS personnel as listed on the attached, Appendix A, sign in sheets.

40 C.F.R. Part 68 – CHEMICAL ACCIDENT PREVENTION PROVISION

Subpart A – General

40 C.F.R. § 68.10 Applicability – INEOS is a stationary source that has more than a threshold quantity of regulated substances in their process. The last submittal was made August 12, 2021, due to the 5-year update per 40 CFR 68.190(b)(1). The facility is subject to the Occupational Safety and Health Administration's (OSHA) Process Safety Management (PSM) Standard (29 CFR § 1910.119).

40 C.F.R. § 68.12 General requirements – INEOS submitted their most recent RMP submission on August 12, 2021. The regulated substance(s) under the toxic and flammable tables are listed over the threshold quantity for the RMP Program Level 3 processes.

40 C.F.R. § 68.15 Management – INEOS developed a management system to oversee the implementation of the risk management program elements. INEOS provided an organizational chart that outlined the positions to implement the individual elements of the RMP as required by this subpart.

Subpart B – Hazard Assessment

40 C.F.R. § 68.20 Applicability – INEOS operates an RMP Program Level 3 process which is subject to this subpart and thus is required to prepare a worst-case release scenario analysis and complete the five-year accident history. I reviewed the documentation provided to make this analysis and identified no areas of concern with this subpart.

40 C.F.R. § 68.22 Offsite Consequence Analysis Parameters – INEOS employed the parameters specified by EPA in this rule by using the RMP*Comp™ software. I reviewed the offsite consequence analysis and supporting documentation to assure the data was accurate and correct.

40 C.F.R. § 68.25 Worse-case release scenario analysis – INEOS identified and analyzed at least one worst-case scenario in its Program 3 processes using the RMP* Comp™ software, thus meeting the requirements of the regulation.

40 C.F.R. § 68.28 Alternative Release Scenario Analysis – INEOS identified and analyzed at least one alternative release scenario in its Program 3 processes using the RMP* Comp™ software, thus meeting the requirements of the regulation.

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

40 C.F.R. § 68.33 Defining offsite impacts- Environment – INEOS used US Geological Survey maps data to determine the environmental receptors and the distances to endpoints.

40 C.F.R. § 68.36 Review and update – INEOS understands documentation associated with the worst-case scenarios that should be updated and reviewed at least every five years and are anticipating a review in 2026.

40 C.F.R. § 68.39 Documentation – INEOS operates a RMP Program Level 3 process which is subject to this subpart and thus is required to prepare a worst-case release scenario analysis and complete the five-year accident history. I reviewed the documentation provided to make this analysis and identified no areas of concern with information pertaining to this subpart to include the Offsite Consequence Analysis (OCA) data. The facility used the EPA Model RMP*Comp™.

40 C.F.R. § 68.42 Five-year accident history – INEOS did not report any accidental release(s) in their RMP that resulted in deaths, injuries or property damage.

Subpart D – Program 3 Prevention Program

40 C.F.R. § 68.65 Process safety information (PSI) – EPA reviewed various sections of the process safety information for the RMP covered processes at INEOS. There were no areas of concern identified.

40 C.F.R. § 68.67 Process Hazard Analysis (PHA) – EPA reviewed the Process Hazard Analysis (PHA) for the RMP. The PHA study was conducted using What-if, Checklist, and Layer of Protection Analysis (LOPA). EPA reviewed several recommendations for follow-up purposes. The PHA study was conducted using the Hazard and Operability Analysis (HAZOP) method. No areas of concern were observed from the information reviewed.

40 C.F.R. § 68.69 Operating procedures – EPA reviewed and discussed with INEOS personnel operating procedures of several units, which included the Standard Operating Procedure (SOP) certification procedure, confined space entry, and lockout/tag out procedures. EPA requested the last five years of annual operating procedure certifications, and all were current.

40 C.F.R. § 68.71 Training – INEOS has established operator training as required by this subpart. Operator Training consists of both On the Job Training and Computer Based Training. Written tests were used to evaluate operator competency. As a new hire, at least three to four months is allocated to initial job training while refresher training is required every three years per the regulation or sooner. EPA requested training records for review and was provided the files for several employees at different experience levels. I reviewed employee training records and determined training to operate in the unit is current and refresher trainings are administered as required. There were no areas of concern noted from the information reviewed.

40 C.F.R. § 68.73 Mechanical integrity – I reviewed mechanical integrity records for randomly selected inspections of RMP covered equipment and the written procedure for maintaining the integrity of the process.

40 C.F.R. § 68.75 Management of change (MOC) – EPA reviewed and discussed written procedures for MOCs with site personnel and their implementation at the facility. The MOCs were implemented using their onsite SharePoint site. EPA reviewed several MOC's from a query of MOCs created over the last five years. They were reviewed for proper implementation and completeness. EPA did not identify any areas of concern.

40 C.F.R. § 68.77 Pre-startup safety review (PSSR) – INEOS provided documentation regarding pre-startup safety procedures and site plan. EPA did not identify any areas of concern.

40 C.F.R. § 68.79 Compliance audits – EPA requested the two most recent compliance audits for review. INEOS provided compliance audit reports completed in February of 2022 and the most recent audit was completed in February 2025, however the report is still in draft form and has not been finalized. EPA did not identify any areas of concern.

40 C.F.R. § 68.81 Incident investigation - I reviewed a list of incident reports/investigations for all incidents, which resulted in, or could have reasonably resulted in, a catastrophic release of a regulated substance for the last five years. Of the incident investigations reviewed there were two investigations noted for failing to initiate as promptly as possible, but not later than forty-eight (48) hours following

the incident. Incident No: 17672 and 10517. INEOS failed to implement 68.81(b) as required by the regulation.

40 C.F.R. § 68.83 Employee participation – INEOS has implemented the requirements of this subpart. No areas of concern were noted at the time of the inspection.

40 C.F.R. § 68.85 Hot work permit – INEOS discussed the process for conducting hot work onsite and several hot work permits were reviewed from within the last quarter of 2025. All hot work permits are retained for three years as required by the regulation. There were no areas of concerned noted at the time of the inspection.

40 C.F.R. § 68.87 Contractors – INEOS uses Zachary, an embedded contractor, to conduct in house maintenance. INEOS uses ISNET World for its contractor selection and assures that all contractors that may work on site have been trained on the potential hazards related to the process equipment and work that the contractor may perform. In addition, performance reviews are handled annually. There were no areas of concern noted at the time of the inspection.

Subpart E – Emergency Response

40 C.F.R. § 68.90 Applicability –INEOS is a first responder stationary source in case of an accidental release of a regulated substance, therefore, the facility is subject to the requirements of part 68.95.

40 C.F.R. § 68.95 Emergency Response – INEOS is a first responder facility. EPA reviewed the facility's Integrated Contingency Plan - Emergency Response Plan. INEOS has an Emergency Response Team (ERT) of forty (40) employees from varied process units and participation is voluntarily. The Emergency Response Plan details the steps to take in the event of a release of the regulated substances. EPA reviewed training records for several ERT members, and no areas of concern were identified.

Subpart G – Risk Management Plan

40 C.F.R. § 68.190 Updates – No updates.

40 C.F.R. § 68.195 Required corrections -The next RMP re-submission is due by August 12, 2026, unless an update or correction is required by 40 C.F.R. § 68.190 and § 68.195.

Section III – AREAS OF CONCERN (AOC)

1) **Incident investigation, 40 C.F.R. § 68.81 -** A list of incident reports/investigations for all incidents, which resulted in, or could have reasonably resulted in, a catastrophic release of a regulated substance for the last five years. Of the incident investigations reviewed there were two investigations noted for failing to initiate as promptly as possible, but not later than forty-

eight 48 hours following the incident. Incident No: 17672 and 10517. INEOS failed to implement 68.81(b) as required by the subpart.

Closing Meeting - EPA Region 6 inspector, Sherronda Phelps, conducted a closing conference Closeout/Exit Briefing on May 1, 2025, for the inspection. During the closing conference, I reviewed the Areas of Concern noted and any comments or questions while on site.

Section IV – FOLLOW UP

No follow up correspondence was provided from the facility nor were there any requests made.

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

1. Appendix A – Sign in sheets

APPENDIX A

USEPA Clean Air Act Section 112(r) / Chemical Accident Prevention Provisions
(40 C.F.R. Part 68)
Opening Meeting Sign in Sheet

Name (Please Print)	Employer	Title
Randolph Winnegar	Ineos	Operations Manager
Alex Arafat	INEOS	PSM Engineer
Chad Eagleson	Ineos	Operations Manager
Rosa Novo	Ineos	PSM Team Lead
R J Brewster	INEOS	HR Manager
BILL SLOANE	INEOS	SITE MANAGER
Chock Ganapathy	INEOS	SSHE MANAGER
Ronnie Chaumont	INEOS	Maintenance & Engineering
Karen Cuvole	INEOS	Process Tech. Manager
William Steiner	Ineos	PSM Manager
Paul Ajibogun	INEOS	Sr Corporate Counsel
Sherronda Phelps	EPA	CAA INSPECTOR

USEPA Clean Air Act Section 112(r) / Chemical Accident Prevention Provisions
(40 C.F.R. Part 68)
Sign in Sheet

Name (Please Print)	Title	Program
William Steiner	PSM Manager	
CHOCK GANAPATHY	SSHE MANAGER	
Joel Gale	ER+ Security Supervisor	
Rosa M. Novo	DSM Team Lead	
Tim Buchanan	ER + Security Supervisor	
Elliott Gundelach	Sr. Contractor Coordinator	
Jonathan Bottego	Maintenance Superintendent	
Ronnie Chaumont	Maintenance & Engineering Mgr	
Joel Ankenbruck	SHE/Training WTL	
Caitlin Beegle	PE East Resource Team Lead	
BRANDON HAUTT	PE West Resource Team Lead	
Randolph Winnegar	PE Heritage Ops Manager	

USEPA Clean Air Act Section 112(r) / Chemical Accident Prevention Provisions
(40 C.F.R. Part 68)
Sign in Sheet

Name (Please Print)	Title	Program
Nicholas Turner	Mechanical Integrity Engineering Lead	
Rosa M. Novo	PSM Team Leader	
William Steiner	PSM Manager	
Ronnie Chaumont	Maint & Engineering Mgr	
Scott Hanes	Chief Inspector	
Karen Curole	Process Technology Mgr.	

USEPA Clean Air Act Section 112(r) / Chemical Accident Prevention Program
(40 C.F.R. Part 68)
Close Out Meeting Sign in Sheet

Name (Please Print)	Employer	Title
SHERRONDA PHELPS	US EPA	CAA INSPECTOR
Rosa M NOVO	Ineos	PSM Team Lead
William Steiner	Ineos	PSM Manage
Paul Ajibogun	INEOS	SR. Corporate Counsel.
Chock Ganapathy	INEOS	SSHE Manager
Bay Brewster	INEOS	HR Manager
Karen Curole	INEOS	Technology Mgr.
BILL SLOAT	INEOS	SITE MANAGER
Ronnie Chaumont	INEOS	Maint. & Eng. Mgr.
Randy Winnegar	INEOS	Heritage Ops Mgr.