

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	February 4 – 6, 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:	Gulf Coast Ammonia Holdings, LLC	
Facility Name:	Gulf Coast Ammonia LLC	
Facility Physical Location:	2800 Loop 197 South	
(city, state, zip code)	Texas City, TX 77590	
Mailing address:	435 5th Street South	
(city, state, zip code)	Texas City, Texas 77591	
County/Parish:	Galveston County	
Facility Phone Number:	(409) 797-1700	
Facility Contact:	Dominique Briquet	Technical and Operations Director
	dbriquet@gulfcoastammonia.com	
FRS Number:	110071536448	
Identification/Permit Number:		
Media Identifier Number:	RMP 100000251309	
NAICS:	325311 Nitrogenous Fertilizer Manufacturing	
SIC:		
Personnel participating in inspection:		
Aimee Boss	EPA Region 6 – ECDSC	Physical Scientist
Dominique Briquet	Gulf Coast Ammonia	Technical and Operations Director
Freddy Mota	Air Products	Unknown
Joel Garza	Air Products	Unknown
Clint McAlister	Air Products	Unknown
Edward Mas Rivera	Air Products	Unknown
Steve McManos	Air Products	Project Manager
Matthew Harmon	Air Products	Storage Site Manager
Valerie Kaelauskas	Air Products	EHS Regional Manager
Jose Granja	Air Products	Unknown
Ram Tekumalla	Air Products	Project Director
Piyush Raval	Air Products	Process Systems
Drew Smith	Air Products	Operations Manager
Shauna Dallmer	Tricord Consultants	Consultant
Miguel Perales	Advario	Process Operations
Clare Emerson	Air Products	Operations Process Safety Manager
Eric Flemming	Gulf Coast Ammonia	Project Manager

EPA Lead Inspector Signature/Date		
	Aimee Boss	Date
Supervisor Signature/Date		
	Kayla Buchanan	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

United States Environmental Protection Agency (EPA) Region 6 Inspector Aimee Boss (“I”) arrived at the Gulf Coast Ammonia LLC (“GCA” or the “Facility”), located in Texas City, Texas at 9:00 AM on February 4, 2025, for an announced inspection. I presented my credentials to security. Once inside the facility for the opening conference, I presented my credentials to Dominique Briquet and informed the attendees listed in Appendix 1 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 CAA § 112(r). Employee representatives were invited to participate in the inspection. The Facility does not have union representation.

FACILITY DESCRIPTION

GCA is an anhydrous ammonia storage facility located at 2800 Loop 197 South, Texas City, Texas 77590 on a lease track within the Advorio Texas City, L.P. (“Advorio”) facility. The Facility is in operation 24 hours a day, seven days a week. Air Products and Chemicals, Inc. (“Air Products”) is the operator of the GCA owned facility. Advorio is present onsite as contractors, in addition to other third-party contractors. Anhydrous Ammonia is the only regulated substance used at this facility with a quantity of 154,322,000 lbs, over the 10,000 lbs threshold quantity for regulated substances and is a Program 3 process. 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 § 68.115, shall comply with the requirements of the Part 68 – Chemical Accident Prevention Provision. The anhydrous ammonia is transported into the facility via pipeline to a storage tank that is under positive pressure. The systems to maintain pressure in the system includes condensers, compressors, and flare. The intention is to be able to transport the product out via marine transport.

Section II - OBSERVATIONS

The documentation review began onsite with GCA, Air Products, and Advorio personnel following the list of documentation I requested in the inspection notification emails sent on

January 27 and 30, 2025. Additional documentation was requested during the on-site inspection and electronic upload of documents was requested in emails sent on February 4, 6, and 7, 2025.

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

Subpart A – General

40 C.F.R. § 68.10 Applicability – GCA is a stationary source that has more than a threshold quantity of regulated substances in their process. The most recent Risk Management Plan (“RMP”) re-submittal was on January 31, 2025. GCA submitted its initial RMP on June 14, 2023. GCA is a RMP Program 3 facility. The Facility is subject to the Occupational Safety and Health Administration’s (OSHA) Process Safety Management (PSM) Standard (29 C.F.R. § 1910.119).

40 C.F.R. § 68.12 General requirements – GCA’s regulated substance (anhydrous ammonia) is a listed toxic substance over the threshold quantity for the RMP Program Level 3 process.

40 C.F.R. § 68.15 Management – GCA provided documentation that outlined the positions for implementation of the individual elements of the RMP, as required by this subpart, at the time of this inspection. I identified no areas of concern with this subpart.

Subpart B – Hazard Assessment

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

40 C.F.R. § 68.22 Offsite consequence analysis parameters – GCA provided the parameters in the RMP as required by this subpart. I identified no areas of concern with this subpart.

40 C.F.R. § 68.25 Worse-case release scenario analysis – GCA analyzed and reported a worst-case release scenario in the RMP as required by this subpart. I identified no areas of concern with this subpart.

40 C.F.R. § 68.28 Alternative release scenario analysis – GCA identified an alternative release scenario in its Program 3 process as required by this subpart. I identified no areas of concern with this subpart.

40 C.F.R. § 68.30 Defining offsite impacts-population – GCA provided Marplot maps with the current Census Bureau population data in the software program. I identified no areas of concern with this subpart.

40 C.F.R. § 68.33 Defining offsite impacts-environment –GCA provided Marplot maps with data to identify environmental receptors. I identified no areas of concern with this subpart.

40 C.F.R. § 68.36 Review and update – GCA provided Marplot maps of the worst-case and alternative-case scenarios. The worst-case scenarios should be updated and reviewed at least every five years. I identified no areas of concern with this subpart.

40 C.F.R. § 68.39 Documentation – GCA operates a RMP Program Level 3 process, which is subject to this subpart and is required to prepare a worst-case release scenario analysis and complete the five-year accident history. I reviewed the worst-case and alternative-case scenarios provided. I identified no areas of concern with this subpart.

40 C.F.R. § 68.42 Five-year accident history – I reviewed GCA’s incidents since operation began in December of 2023. I identified no areas of concern with this subpart.

Subpart D – Program 3 Prevention Program

40 C.F.R. § 68.65 Process safety information (PSI) – I reviewed various sections of the PSI for the RMP covered process at GCA. I was provided the original process and instrumentation diagram (“P&ID”) associated with the process, block flow diagram, safety data sheet, maximum indented inventory, and upper and lower limits. I reviewed documentation that outlines the design codes and standards, including the American Petroleum Institute (“API”).

During the facility tour on February 5, 2025, I observed piping that did not have labels as required by direction of flow, color-coding to identify the hazardous material present, placement of pipe labels, and type and size of letters on pipe labels, as required by the American National Standards Institute (ANSI) and the American Society of Mechanical Engineers (ASME) Standard ANSI/ASME A13.1, Scheme for the Identification of Piping Systems (Appendix 2). Air Products representatives stated that the piping wasn’t labeled because it was going to re-stripped and painted. On March 20, 2025, I requested work orders or invoices to verify the recent painting. On March 21, 2025, I received photographs of the pipes in question with labels attached **[AOC 1]**.

40 C.F.R. § 68.67 Process hazard analysis (PHA) – I reviewed the initial PHA for this facility. The facility startup date was in December of 2023, therefore the only PHA identified by the facility at the time of this inspection was the initial PHA as there had not been an additional stationary source added to the process and is within the 5-year revalidation requirement of this subpart. At the time of this inspection, GCA had not finalized the initial PHA **[AOC 2]**. There were seven (7) recommendations from the PHA that had not been completed by the projected due date of October 31, 2024. One (1) recommendation was in the process of being complete while I was on site **[AOC 3]**. Additionally, GCA had not conducted a stationary source siting for the storage tank at the time of this inspection **[AOC 4]**.

40 C.F.R. § 68.69 Operating procedures – I reviewed several operating procedures such as: Air Products Energy Isolation and Lockout/Tag out/Try with Isolations Requiring Review (“IRR”), Air Products Permit-Required Confined Space Procedure, and selected and reviewed fifteen (15) operating procedures from a list index of operating procedures. The operating procedures contain HAZOP information and notes that relate to why the operating procedure is required, and what safeguards are being addressed in the procedure. While on the facility tour, I witnessed binders of operating procedures in the control room on site for operators to access.

As a requirement of this subpart, operating procedures shall be certified annually as current and accurate. The initial review and certification of operating procedures was on November 8, 2023. GCA completed the certification of operating procedures on January 24, 2025. At the time of this inspection, I did not receive a certification from 2024 **[AOC 5]**.

40 C.F.R. § 68.71 Training – I reviewed the Air Products Texas City Training Policy. This policy covers several units within the Texas City area, including the GCA facility. I reviewed the Air Products Anhydrous Ammonia Training procedure, the ammonia awareness PowerPoint, and training records housed on the online system, Learnex. I reviewed the status training system summary for three (3) randomly selected Air Products employees with a variety of tenure. I identified no areas of concern with this subpart.

40 C.F.R. § 68.73 Mechanical integrity (MI) – I reviewed Air Products Mechanical Integrity documentation such as, Air Products and Chemicals APCI Gulf Coast Ammonia Plant – Ammonia storage tank and associated process equipment and piping – Inspection scope notice, Mechanical Integrity Program for Pressure Systems, and Mechanical Integrity Program for Rotating equipment, API inspection and certification for the storage tank. Air Products uses a Risk Based Inspection frequency for the storage tank and corrosion. The Risk based analysis assessment was completed by third-party contractor, MISTRAS.

I reviewed the concrete column non-destructive testing records, pressure safety valve inspections, and alarm preventative maintenance inspections for the last 6 months. I identified no areas of concern with this subpart.

40 C.F.R. § 68.75 Management of change (MOC) – I reviewed Air Products MOC procedure and reviewed a list of issued MOC’s for the past three years at the time of this inspection. Three MOC’s were reviewed during this inspection, identification numbers 1728512083, 1738850654, and 1734540156. MOC’s are tracked electronically in the Air Products software, eMOC, after GCA and technical approve of the MOC. eMOC populates the requirements based on the type of change. A simple change populates an electronic PSSR checklist while a complex change that requires a manual PSSR checklist that is uploaded into eMOC. I identified no areas of concern with this subpart.

40 C.F.R. § 68.77 Pre-startup safety review (PSSR) – I reviewed the Air Products Operational Readiness Inspection Process (or Pre-Startup Safety Reviews) procedure and the two (2) most recent PSSR’s. The PSSR checklist for MOC OPS-1736348256 indicates that housekeeping needs

to be suitable before start-up, however this section was not completed and signed off on before the start-up approval on January 31, 2025 (Appendix 3) **[AOC 6]**.

40 C.F.R. § 68.79 Compliance audits – At the time of the inspection, GCA had not completed a compliance audit. The rule requires GCA to complete a compliance audit “at least every three years to verify that the procedures and practices developed under this subpart are adequate and are being followed.” The facility has been in operation since December 2023 therefore has not reached the three-year requirement as required by this subpart.

40 C.F.R. § 68.81 Incident investigation - I reviewed GCA’s Incident Investigation Policy and incident investigations for the past year. Four (4) incident investigations were not initiated within 48 hours of the incident, as required by this subpart (Appendix 4) **[AOC 7]**.

40 C.F.R. § 68.83 Employee participation – I reviewed GCA’s Employee Participation Policy. I did not identify any areas of concern with this subpart.

40 C.F.R. § 68.85 Hot work permit – I reviewed GCA’s Safe Work Permit Procedures and one year worth of safe work permits that contain hot work. Two (2) of safe work permits that require hot work were missing atmospheric monitoring information, Safe Work Permit Procedures **[AOC 8]**.

40 C.F.R. § 68.87 Contractors – GCA is the owner of the facility whereas Air Products leads the operations of the facility. The Facility is built on a lease that is collocated with the Advorio facility. Air products and Advorio are contractors for facility operations and maintenance. Additionally, third-party contractors are on site. I reviewed Air Products Rules for Contractor Safety and Supplier Qualification for Construction Contractors documents, and the Trade Construction Company LLC Site Safety Plan. Contractors must go through a pre-qualification process and once qualified, have an evaluation every three years after. Additionally, all contractor personnel are required to submit an accident preventative technique one a week and are used by Air Products Site Management team evaluate results of the APT’s on a weekly basis. After the completion of a project, the performance is evaluated to determine whether the contractor status should change. For new projects, a contractor’s performance is reviewed to determine if a re-audit is needed. I identified no areas of concern with this subpart.

Subpart E – Emergency Response

40 C.F.R. § 68.90 Applicability – GCA is not a responding stationary source in case of an accidental release of a regulated substance and is applicable to this subpart need not comply with § 68.95 of this part. I reviewed the Emergency Action Plan. I identified no areas of concern with this subpart.

40 C.F.R. § 68.93 Emergency response coordination activities – I reviewed the GCA Overall Evaluator Notes for the Texas City Drill on June 28, 2024, which documented communications,

as required by this subpart and reflected in 68.96(c)(2). I identified no areas of concern with this subpart.

40 C.F.R § 68.96 Emergency response exercises – GCA’s June 28, 2024, Texas City Drill, notification for annual coordination and exercise was completed, as required by this subpart. I identified no areas of concern with this subpart.

Subpart G – Risk Management Plan

40 C.F.R. § 68.195 Required Corrections – GCA’s initial RMP submittal was on June 14, 2024. When preparing for the inspection, the responsible party and emergency contact had not been updated. GCA identified the previous contact retired in April of 2024. The most recent update of January 31, 2025, after the one-month requirement for update for this contact change. The RMP was not updated within one month of the change in emergency contact **[AOC 9]**.

Section III – AREAS OF CONCERN (AOC)

AOC 1 – 40 C.F.R. § 68.65(d)(2) Process Safety Information (PSI)

(d) Information pertaining to the equipment in the process.

(2) The owner or operator shall ensure and document that equipment complies the process is designed and maintained in compliance with recognized and generally accepted good engineering practices.

*Standard ANSI/ASME A13.1, Scheme for the Identification of Piping Systems
This Standard is intended to establish a common system to assist in identification of hazardous materials conveyed in piping systems and the materials’ hazards when released in the environment.*

GCA failed to have piping labels consistently as required by Standard ANSI/ASME A13.1. During the facility tour, I observed areas missing pipe labeling, such as near the condenser and warm ammonia gas heater. Air Products representatives stated that the piping wasn’t labeled because it was going to be re-stripped and painted. On March 20, 2025, I requested work orders or invoices to verify the recent painting. On March 21, 2025, I received photographs of the pipes in question with labels attached.

AOC 2 – 40 C.F.R. § 68.67(a) Process hazard analysis (PHA)

(a) The owner or operator shall perform an initial process hazard analysis (hazard evaluation) on processes covered by this part. The process hazard analysis shall be appropriate to the complexity of the process and shall identify, evaluate, and control the hazards involved in the process. The owner or operator shall determine and document the priority order for conducting process hazard analyses based on a rationale which includes such considerations as extent of the process hazards, number of potentially

affected employees, age of the process, and operating history of the process. The process hazard analysis shall be conducted as soon as possible, but not later than June 21, 1999. Process hazards analyses completed to comply with 29 CFR 1910.119(e) are acceptable as initial process hazards analyses.

At the time of this inspection, GCA failed to officially complete their initial PHA.

AOC 3 – 40 C.F.R. § 68.67(e) Process hazard analysis (PHA)

(e) 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.

GCA failed to complete seven (7) PHA recommendation action items by the due date of October 31, 2024.

AOC 4 – 40 C.F.R. § 68.67(c)(5) Process hazard analysis (PHA).

(c) The process hazard analysis shall address:
(5) Stationary source siting, including the placement of processes, equipment, and buildings within the facility, and hazards posed by proximate stationary sources, and accidental release consequences posed by proximity to the public and public receptors.

GCA failed to conduct a facility siting for the storage tank. GCA's submitted the Air Products Project Hazard Review Process document which states that the hazard review must cover a facility siting to mitigate the potential facility impact.

AOC 5 – 40 C.F.R. § 68.69(c) Operating procedures.

(b) 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

GCA failed to certify annually that the operating procedures are current and accurate in 2024. At the time of this inspection, I did not receive a certification from 2024.

AOC 6 – 40 C.F.R. § 68.77(b)(2) Pre-Start Up Safety Review (PSSR).

(b) The pre-startup safety review shall confirm that prior to the introduction of regulated substances to a process:

(2) Safety, operating, maintenance, and emergency procedures are in place and are adequate.

GCA failed to follow the PSSR procedure ensuring items were completed before startup. The PSSR checklist for MOC OPS-1736348256 to indicate that housekeeping was suitable before startup, was left unsigned indicating it was incomplete before startup.

AOC 7 – 40 C.F.R. § 68.81(b) Incident investigation

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

GCA failed to conduct four (4) incident investigations, identified in Incident Reports # 2730585, 2747111, 2751150, and 2811626, within 48 hours of the incidents.

AOC 8 – 40 C.F.R. § 68.85(b) Hot work permit

(b) The permit shall document that the fire prevention and protection requirements in 29 CFR 1910.252(a) have been implemented prior to beginning the hot work operations; it shall indicate the date(s) authorized for hot work; and identify the object on which hot work is to be performed.

GCA failed to document atmospheric monitoring was completed on safe work permits that required hot work.

- Safe Work Permit MPTK-47-1 to Remove/Reinstall Vacuum Break A (PSV 51160A) at top of tank was a hot work and line break permit. The special instructions mention continuous monitoring when using power tools. No air monitoring documentation or data was retained.
- Safe Work Permit MPTK-51 to Isolation of PSV 51160C and is a hot work and line break permit. On this safe work permit, hot work is not checked off under “Does the work involve other special equipment or activities” however hot work precautions such “fire blankets & fire extinguisher”, “O2/LEL test and complete log”, and “are isolation-install tarps or barricades” are checked, indicating hot work does require special equipment. No air monitoring documentation or data was retained.

AOC 9 – 40 C.F.R. § 68.195(b) Required corrections.

(b) Emergency contact information—Beginning June 21, 2004, within one month of any change in the emergency contact information required under § 68.160(b)(6), the owner or operator shall submit a correction of that information.

GCA failed to update the RMP emergency contact information within one month of a change in personnel. GCA’s first RMP submission was completed on June 14, 2023, and the most recent update was completed on January 31, 2025. When preparing for the inspection, the responsible party and emergency contact was not updated. GCA identified the previous contact retired in April of 2024. The most recent update of

January 31, 2025, is well after the one-month requirement for update for this contact change.

I conducted a closing conference at GCA at 4:30 pm on February 6, 2025, for the inspection. During the closing conference, I explained the EPA inspection report process. At the time of this closing conference, I identified seven (7) areas of concern. Additionally, AOCs 1 and 5 were determined after the conclusion of the inspection and were not included in the closing conference.

Section IV – FOLLOW UP

EPA received documentation on from GCA on February 4, 6, and 7, and March 21, 2025.

Section V – LIST OF APPENDICES

All Appendices other than Appendix 1 are classified as Confidential Business Information (CBI) or Sensitive Appendices and are not included in the online published inspection report. CBI Appendices include documents that are claimed CBI by the facility. Sensitive Appendices may include appendices that will not be posted but are not explicitly CBI. These could include Personally Identifiable Information (PII) or Homeland Security sensitive information.

Appendix 1 – List of Attendees

Appendix 2 – Photos of Piping Without Labels

Appendix 3 – PSSR Checklist for MOC OPS-1736348256

Appendix 4 – Incident Reports # 2730585, 2747111, 2751150, and 2811626