



**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	05/20/2014		
Media:	Air		
Regulatory Program(s)	RMP		
Company Name:	Invista S.a.r.l.		
Facility Name:	Invista Victoria Plant		
Facility Physical Location:	2695 Old Bloomington Road		
(city, state, zip code)	Victoria, Texas 77905		
Mailing address:	P.O. Box 2626		
(city, state, zip code)	Victoria, Texas 77902		
County/Parish:	Victoria County		
Facility Contact:	Brian G. Alexander	PSM Leader	
	Brian.g.alexander@invista.com		
FRS Number:	1000 0018 8021		
Identification/Permit Number:	O-01904		
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Facility Representatives:	Brian G. Alexander	PSM Leader	(361) 572-2032
	Lance E. Thomasson	Environmental Manager	(361) 572-2317
	Kevin Burke	Plant Manger	(307) 630-6770
EPA Inspectors:	Sherronda K. Phelps	Region 6/6EN-ASH	(281) 983-2122
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	Author:	US EPA Region 6 Compliance Assurance and Enforcement Division Dallas TX	
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EPA Lead Inspector	<i>Sherronda Phelps</i>		7/14/2014
Signature/Date	Sherronda Phelps		Date
Supervisor	<i>Samuel Tates</i>		7/9/2014
Signature/Date	Samuel Tates		Date

Section I - INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector, Sherronda Phelps, arrived at the Invista Victoria Plant at 9:05 AM on May 20, 2014 for an unannounced inspection. I met with Brian G. Alexander, PSM Leader; Lance Thomasson, Environmental Manager; and Kevin Burke, Plant Manager during the Opening Conference. I presented my credentials to Brian Alexander and informed him that this was an EPA inspection to determine compliance with the facility's Risk Management Plan implementation. The scope of the inspection is a partial compliance evaluation (PCE) and includes evaluation of the compliance of the facility with the Clean Air Act Section 112(r) and 40 CFR Part 68 – Chemical Accident Prevention Provisions.

FACILITY DESCRIPTION

The Invista Victoria Plant was previously known as the DuPont Victoria Plant. On April 30, 2004, the facility was purchased by INVISTA S.a.r.l., a private company owned by a subsidiary of Koch Industries. The Invista Victoria Plant consists of manufacturing processes to produce Nylon Intermediates (hexamethylenediamine, adipic acid and dodecanedioic acid). With the production of these products the following regulated substances are used or produced as intermediates: Anhydrous Ammonia, Aqueous Ammonia, Hydrocyanic Acid, 1,3 Butadiene, Chlorine, Hydrogen, and Natural Gas. Invista employs about 677 employees. They are a facility that operates 24 hours, 7 days a week.

Section II - OBSERVATIONS

68.10 Applicability

I observed that, as reported in their 10/21/2011 RMP submittal, the Invista Victoria Plant is a stationary source that has more than a threshold quantity of regulated substance in a process proving that 40 CFR Part 68 is applicable.

68.12 General Requirements

The Invista Victoria Plant has submitted a single RMP that reflects all covered processes. As a facility with program 3 processes, Invista must develop and implement a management system, conduct a hazard assessment, implement the prevention requirements of 68.65 through 68.87, develop and implement an emergency response program, and submit the data elements from 68.175 in their RMP.

68.15 Management

The Invista Victoria Plant has developed a management system that oversees the implementation of the RMP elements and has assigned a qualified person or position to oversee the RMP. I observed this by the organization chart provided by Mr. Alexander. This chart detailed and identified the organizational structure and the personnel assigned to RMP elements and their responsibilities. Mr. Brian Alexander is the PSM Leader where he oversees the Risk Management Plan Program and its implementation.

*Subpart B – Hazard Assessment**68.20 Applicability*

Invista is a Program 3 stationary source 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 area of concern with information pertaining to sections 68.22 – 68.33 or any OCA data. The facility used the EPA Model RMP Comp.

68.36 Review and Update

The Invista Victoria Plant indicated they review their OCA at least once every five years.

68.39 Documentation

The Invista Victoria Plant maintained documentation describing the vessel selected as worst case scenario, and assumptions and parameters used. A description of the scenarios identified were documented which included estimated quantity released rate, duration of release, methodology used to determine distances to endpoints, and data used to estimate population and environmental receptors potentially affected.

68.42 Five year accident history

As required Invista is reporting in their RMP accident history when there is an incident that may have caused injury. However, the RMP submitted, October 21, 2011, there were no incidents to be reported.

*Subpart D – Program 3 Prevention Program**68.65 Process Safety Information*

Invista provided process safety information (PSI) including information pertaining to the hazards of substances in the processes, technology of the process, and maximum intended inventories of the units reviewed. I reviewed PSI for the following units of focus: **OP1/OP1A – Cyclohexane Oxidation, HMD Synthesis & NH3 Recovery, and OP11/OP11A – Catalyst and BD Reaction**. Mr. Alexander guided me through the facility's intranet where these items are accessed. Invista provided the Maximum Intended Inventory for the RMP covered process and an example calculation for reference which is included in the confidential file **Appendix CBI**.

68.67 Process Hazard Analysis

Invista provided a revalidation matrix which details the next due date for the covered processes. Of the covered processes I reviewed, all appeared to be current. Revalidation dates are provided in the table below. Mr. Alexander explained Invista's PHA Risk Matrix and how it is implemented during the review. I also reviewed the findings made within these PHA's and requested the follow up information on said findings. Invista uploads all findings/recommendations into the Lynxx system where they are assigned and tracked to completion.

PHA Revalidation Dates		
Process Name	Last Revalidation Date	Next Revalidation Due Date
OP1	October 2009	May 2014

OP1A	August 2011	April 2016
HMD/NH3 Recovery	June 2012	April 2017
OP11/11A	December 2009	November 2014

68.69 Operating Procedures

Invista Victoria provided all certification of operating procedures and the corresponding documentation that the operating procedures have been annually certified in years past.

68.71 Training

Invista Victoria provided training records, for the last five years, of the randomly selected employees I chose from a list provided by, Mike Cavazos, Training Coordinator. Mr. Cavazos provided me with information on the 6 week orientation new hires attend. I selected several employees and reviewed their training records. I observed all employees had been refreshed at least every three years as required. I observed that the certifications of all pressure vessel, tank, and piping inspectors were all current. I also reviewed the training records for selected team members on the Emergency Brigade and all were current and up to date.

68.73 Mechanical Integrity

Invista has established and implemented a procedure to maintain the on-going integrity of process equipment. I requested a list of overdue inspections in the Invista Victoria facility for fixed equipment, rotating equipment and controls. I observed from the list provided there appeared to be no past due or overdue inspections. I then requested follow up documentation on several piping components, interlocks, storage tanks, pumps and pressure vessels to confirm the dates noted and how the facility came to the determination for the next due date. Invista Victoria also works with Centennial and PetroChem in meeting the inspection requirements of their fixed equipment program. Invista uses SAP as the master database for inputting, scheduling and tracking inspection dates, as well as, maintenance work orders for all equipment pieces in the mechanical integrity program.

68.75 Management of Change

Invista has established and implemented a procedure to manage changes to process chemicals, technology, equipment, and procedures. I observed this procedure via the Invista's intranet. The procedure addresses the technical basis for the change, the impact on safety and health, modifications or operating procedures, and authorization requirements for the proposed change. I reviewed and retrieved at least two items from the Lynxx system in order to follow up on the corresponding MOC.

68.79 Compliance Audits

After reviewing the compliance audits it appears that the facility is evaluating all elements of the RMP as required. All findings and recommendations are being uploaded, assigned and tracked to completion via the facility's Lynxx program. Invista works with ERM in meeting these requirements. The facility provided documentation, I reviewed, certifying these audits were conducted in 2009 and 2012.

68.81 Incident Investigation

Invista ranks incidents at three different levels where level 1 is the lowest and level 3 being the highest. I requested a list of recent incidents to occur at the facility. There were no Level 3 incidents listed, I reviewed some randomly selected incidents for purposes of confirming implementation of the regulation. The facility investigates all incidents within 48 hours and assigns personnel to the recommendations and finding. The facility uses the incidents as required in the Process Hazard Analysis to identify any mitigating factors that might have been overlooked or that still leave an opportunity for improvement.

68.83 Employee Participation

Invista Victoria has developed a written plan of action regarding the implementation of employee participation. I was provided a copy and upon review it met all conditions as required.

68.85 Hot Work Permit

I reviewed several hot work permits during the inspection. It appeared that all necessary information was listed given the particular work performed. All the necessary signatures were noted as well as the corresponding dates of work, from start to finish. I was advised that all permits are kept on site at least 30 days after completion of work.

68.87 Contractors

Invista has a policy in place which defines the requirements for the management of contractor selection and evaluation. I was provided with information which supports the process and how audits are conducted on the contractor's safety performance. There is a badging system in place to control the entrance, exit, and presence of the contractor and its employees in the covered processes.

*Subpart E – Emergency Response**68.90 Applicability*

Invista is a stationary source with program 3 processes subject to this part and is thus required to comply with the requirements of 68.95. Invista has an Emergency Brigade that will respond to incidents on site.

68.95 Emergency Response Program

Invista Victoria is designated as a "first responder" in the case of an accidental release of a regulated substance. Invista provided me with their Emergency Operations Procedures and Plan. This emergency plan includes procedures for informing the public and local emergency response agencies about accidental releases. First aid and emergency medical treatment is detailed in the procedure this information is also available via the Invista's intranet. Participants of the Emergency Brigade undergo Medical Monitoring every two years and fit testing once a year. I randomly selected members of the Emergency Brigade to review their training records. Invista also provided me with inspection records of the emergency equipment. The inspection, testing and maintenance of Emergency Response equipment is all handled by a 3rd party. Two companies by the name of Hegemyer and Universal Fire & Safety Inc.

Subpart G – Risk Management Plan

68.150 Submission

Invista has submitted a single RMP which includes the information required in 40 CFR 68.150.

Section III – AREAS OF CONCERN

On May 22, 2014, I conducted a closing conference with Invista personnel.. All information reviewed during my time on site was summarized. I observed no areas of concern during the time of the inspection.

Section IV – FOLLOW UP

Not applicable.

Section V – LIST OF APPENDICES

Appendix 1 – Opening/Closing conference sign-in sheet

Appendix CBI (not included in published version of the report)

Appendix 1

Opening/Closing Conference Sign-in sheet

5/20/14

INVISTA - GIBN-IN - RMP AUDIT

- 1) SHERRONDA PHELPS, EPA INSPECTOR
phelp.sherronda @ epa.gov
281-983-2122
- 2) Seth Brooks, Health & Safety Manager
seth.brooks @ invista.com
361.572-1335
- 3) Lance Thomasson, Environmental Manager
lance.e.thomasson @ invista.com
(361) 572-2317
- 4) Louis Rodriguez - Compliance Manager
louis.g.rodriguez @ Invista.com
361-572-1232
- 5) Brian Alexander - PSM Leader
brian.g.alexander @ INVISTA.com
361-572-2032

5/21/14

INVISTA - SIGN-IN - Rmp Audit

- 1) SHERONDA PHELPS
- 2) ROBERT W. GOMEZ 361-572-1522 robert.w.gomez@invista.com
- 3) DANIEL M. CHARRON 361-572-1503 daniel.m.charron@invista.com
- 4) RONNIE J. FASKUS 361-572-1531 RONNIE.J.FASKUS-1@INVISTA.COM
- 5) MICHAEL L. CAUNZOS 361-572-1484 MICHAEL.L.CAUNZOS@INVISTA.COM
- 6) BILL MCKNIGHT 361-572-1370 WILLIAM.A.MCKNIGHT@INVISTA.COM
- 7) DON HANCOCK 361-648-5467 MALCOLM D. HANCOCK@INVISTA.COM

INVISTA ~~RE~~ - RMP AUDIT - MAY 22, 2014

1) DAN Mikulenska H+S LEADER 361-572-2016
DANIEL.J.MIKULENKA@INVISTA.COM

2) Brandon Ulbrich Production Coordinator 361-571-1183
bl.ulbrich@INVISTA.COM

INVISTA - EXIT BRIEFING - MAY 22, 2014

1) SHERONDA-PHELPS

2) PAUL HUAHUA

3) Kevin Burke

4) JASON LEIGH