



Region 6 Enforcement and Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	11/29/2022 - 11/30/2022	
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) Program 1	
Company Name:	St. James Holding, LLC	
Facility Name:	Koch Methanol St. James, LLC	
Facility Physical Location:	6586 Highway 3127	
(city, state, zip code)	St. James, Louisiana 70086	
Mailing address:	P.O. Box 510	
(city, state, zip code)	Vacherie, Louisiana 70090	
County/Parish:	St. James	
Facility Contact:	Marc Hoss	VP of Manufacturing & Plant Manager
	Marc.Hoss@kochind.com	
FRS Number:	110070870131	
Identification/Permit Number:	2560-00295-V4	
Media Identifier Number:	RMP 1000 0024 5585	
NAICS:	325199 – All Other Basic Organic Chemical Manufacturing	
Personnel participating in inspection:		
Tony Robledo	U.S. EPA	Inspector/Enforcement Officer
Howard Cole	U.S. EPA	Inspector
Marc Hoss	Koch Methanol	VP of Manufacturing & Plant Manager
Haleigh Engler	Koch Methanol	Environmental Engineer
Josh Wiggins	Koch Methanol	Technical Manager
Whitney Mantooth	Koch Methanol	Health and Safety Manager
Kevan Reardon	Koch Methanol	Environmental Health Safety & Security
EPA Lead Inspector Signature/Date		
	Tony Robledo	
Supervisor Signature/Date		
	Samuel Tates	

Section I – INTRODUCTION PURPOSE OF THE INSPECTON

We, the Environmental Protection Agency (EPA) Region 6 inspectors Tony Robledo and Howard Cole, arrived at the St. James Holding, LLC facility at approximately 9:00 a.m. on November 29, 2022, for an announced inspection. We met with facility representatives noted above at the opening meeting. We presented our credentials and informed them that this was an EPA inspection to determine compliance with the Clean Air Act (CAA) Sections 112(r)(1) and 112(r)(7). The scope of the inspection was a partial compliance evaluation (PCE) and included evaluation of the compliance with 40 C.F.R. Part 68 – Chemical Accident Prevention Provisions.

FACILITY DESCRIPTION

The Koch Methanol (Koch) Plant was designed to produce approximately 5,000 metric tons per day of refined methanol. Methanol is produced using the licensed Air Liquide Lurgi MegaMethanol® technology. The methanol production process consists of three main steps: synthesis gas (syngas) production, crude methanol synthesis, and methanol distillation. The facility handles one regulated flammable chemical (methane) above the RMP threshold quantity. The Koch Plant began operations in June 2021. There are 110 full-time employees at this non-union represented facility. The Plant operates 24 hours a day, 7 days a week.

Section II – OBSERVATIONS

We conducted a walk-through of the facility, accompanied by facility representatives to observe the facility process equipment, and overall operations. We observed no spills, leaks, or fugitive hydrocarbon emission trails with the Forward Looking Infrared (FLIR™) Series GF77 camera. Additional observations and findings are found on the RMP Program Level 1 Checklist, located in **Appendix #1**.

Section III – AREAS OF CONCERN

Close-out Meeting – We convened a closing meeting on Wednesday, November 30, 2022. We informed onsite personnel that a written report would be completed pending the review of additional information requested.

AOC 1. Clean Air Act (CAA) § 112(r)(1) – The General Duty Clause

The owners and operators of stationary sources producing, processing, handling, or storing such substances [i.e., a chemical in 40 CFR part 68 or any other extremely hazardous substance] have a general duty [in the same manner and to the same extent as the general duty clause in the Occupational Safety and Health Act (OSHA)] 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 releases which do occur.

Koch failed to design and maintain a safe facility taking such steps as are necessary to prevent releases. Koch reported to the National Response Center (NRC) 19 separate start-up/upset accidental release events from June 21, 2021, to November 27, 2021, resulting in a total of 4,118 lbs. of ammonia released to the atmosphere (See NRC Incident Chart).

NRC Incident Chart

Incident Date	Chemical	Amount (lbs.)
21 Jun 2021	Ammonia	108
23 Jun 2021	Ammonia	126
24 Jun 2021	Ammonia	184
25 Jun 2021	Ammonia	162
26 Jun 2021	Ammonia	462
27 Jun 2021	Ammonia	293
13 Jul 2021	Ammonia	542
14 Jul 2021	Ammonia	394
30 Jul 2021	Ammonia	209
31 Jul 2021	Ammonia	135
06 Aug 2021	Ammonia	417
26 Aug 2021	Ammonia	118
09 Sep 2021	Ammonia	119
13 Sep 2021	Ammonia	132
17 Sep 2021	Ammonia	202
06 Oct 2021	Ammonia	114
03 Nov 2021	Ammonia	109
07 Nov 2021	Ammonia	133
27 Nov 2021	Ammonia	159
Total	Ammonia	4,118

The Koch Plant does not appear to meet the RMP threshold quantity for anhydrous ammonia at 10,000 pounds, or for ammonia at a concentration of 20 percent or greater at 20,000 pounds. Koch provided documentation that it receives aqua ammonia from delivery at 19 percent concentration. However, EPA has determined that the ammonia handled at the Koch Plant is considered an extremely hazardous substance.

Koch noted that it took the necessary steps to prevent future releases and minimize the consequences of the start-up/upset releases of ammonia, including procedural changes and permit modifications, which were completed in 2022. The specific procedural changes included updates to the start-up procedure *Unit 100 Combined Reforming Initial Start-up* (ISP STJ2 02 100 005 Rev. 2.0), and to *Standard Operating Conditions and Limits* (SOCL STJ2 02 100 001).

Koch submitted its permit modification to the Louisiana Department of Environmental Quality (LDEQ) on June 29, 2022. The permit modification was subsequently approved by the LDEQ on August 12, 2022. LDEQ has delegated authority from EPA to review and issue permit modifications to regulated entities under the CAA.

Section IV – FOLLOW UP

No follow up occurred or was necessary after the inspection.

Section V – LIST OF APPENDICES

Appendix #1 – RMP Program 1 Checklist

Inspection Symbol Key: Y - Yes, N - No, N/A - Not Applicable; S - Satisfactory, M - Marginal,
U – Unsatisfactory.