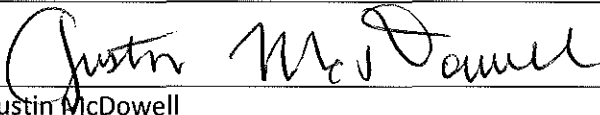
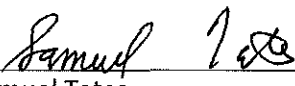


**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	September 25-26, 2018		
Media:	Air		
Regulatory Program(s)	Clean Air Act Section 112(r) and 40 C.F.R. Part 68 Chemical Accident Prevention Provisions (Risk Management Program)		
Company Name:	Arkema Inc.		
Facility Name:	Arkema Inc. – Beaumont Plant		
Facility Physical Location:	2810 Gulf States Road		
(city, state, zip code)	Beaumont, Texas 77704		
Mailing address:	900 First Street		
(city, state, zip code)	King of Prussia, Pennsylvania 19406		
County/Parish:	Jefferson		
Facility Contact:	Jeff McHenry	Plant Manager	
	Jeff.McHenry@arkema.com		
FRS Number:	110000464168		
Identification/Permit Number:	Title V Permit; Air Operating Permit: O1636		
Media Number/ RMP Number:	100000089334		
NAICS:	325199 (All Other Basic Organic Chemical Manufacturing);		
Personnel participating in inspection:			
Justin McDowell	USEPA R6	Inspector	(214) 665-6557
Jeff McHenry	Arkema	Plant Manager	(409) 838- 3981
Bret Duplant	Arkema	HSE Manager	(409) 838- 3981
Scott Frost	Arkema	Operations Manager	(409) 838- 3981
Hassan Samatar	Arkema	Process Technology Manager	(409) 838- 3981
Katherine Prem	Arkema	Process Safety Engineer	(409) 838- 3981
Patrick Gonzales	Arkema	Environmental Team Lead	(409) 838- 3981
Harry Yekel	Arkema	Principal Environmental Engineer – Corporate	(409) 838- 3981
Maricela Hernandez	Arkema	Maintenance/ Inspection Project Lead	(409) 838- 3981
Servelio Camacho	Arkema	Training Coordinator	(409) 838- 3981
Wendell Mills	Arkema	Safety Team Lead	(409) 838- 3981
Didier Auber	Arkema	Thiochemical Manufacture Director	(409) 838- 3981
EPA Lead Inspector Signature/Date			
EPA Lead Inspector Signature/Date			11/14/18
	Justin McDowell		Date
Supervisor Signature/Date			
Supervisor Signature/Date			11/14/2018
	Samuel Tate		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

The United States Environmental Protection Agency (EPA) Region 6 inspector, Justin McDowell, arrived at the Arkema Inc. Beaumont Plant (Arkema Beaumont) at 9:00 AM on Tuesday September 25, 2018, for an announced inspection. I met with Jeff McHenry (Plant Manager), Bret Duplant (HSE Manager), Scott Frost (Operations Manager), Hassan Samatar (Process Technology Manager), Katherine Prem (Process Safety Engineer), Patrick Gonzales (Environmental Team Lead), and Harry Yekel (Principal Environmental Engineer- Corporate) for an opening meeting. I presented my credentials and informed Arkema Beaumont personnel that this was an EPA inspection to determine compliance with the facility's 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. Arkema Beaumont's Risk Management Plan (RMP) is listed as a Program Level three (3) process(es) 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 Arkema Beaumont is a non-union facility.

Table 1: Opening Meeting Attendance, Tuesday September 25, 2018

NAME	POSITON
Justin McDowell	USEPA Inspector
Jeff McHenry	Plant Manager
Bret Duplant	HSE Manager
Scott Frost	Operations Manager
Hassan Samatar	Process Technology Manager
Katherine Prem	Process Safety Manager
Patrick Gonzales	Environmental Team Lead
Harry Yekel	Corporate- Principal Environmental Engineer

FACILITY DESCRIPTION

"The Arkema Inc. Beaumont facility currently manufactures Methyl Mercaptan and Ethyl Mercaptan. Methyl Mercaptan is used to produce photographic chemicals, pharmaceuticals, and Methionine, a synthetic amino acid used in animal feed supplement. Ethyl Mercaptan is used to produce agrichemicals such as biodegradable herbicides and pesticides. Acrolein is used as an intermediate product to manufacture Methylmercaptopropiadehyde (MMP)."- Arkema Beaumont Executive Summary. Arkema Beaumont has approximately 125 employees.

Section II – OBSERVATIONS

On Wednesday September 26, 2018, I conducted a walking tour of the facility accompanied by Arkema Beaumont personnel. We began the tour at Beaumont 1/Beaumont 2 process area then moved to the storage spheres, Acrolein unit, Hydrogen sulfide unit as well as the control room. As I arrived at the facility on Tuesday September 25, 2018, I was provided with a safety orientation video that included a site overview, emergency rally points, and hazards present at the site. The facility has been in turnaround since September 5, 2018, and anticipates completion by October 10, 2018.

Subpart A – General

40 C.F.R. § 68.10 Applicability – Arkema Beaumont is the owner or operator of a stationary source that has more than a threshold quantity of regulated toxic substances, listed in 40 C.F.R § 68.130, in a process and is subject to the Chemical Accident Prevention Provisions. Arkema Beaumont has a Title V Permit along with an Air Operating Permit: O1636 for their Basic Organic Chemical Manufacturing (NAICS: 325199). Arkema Beaumont is subject to the Occupational Safety and Health Administration (OSHA) process safety management (PSM) standard, 29 C.F.R. § 1910.119, and has six (6) Program Level 3 processes.

40 C.F.R. § 68.12 General requirements – Arkema Beaumont re-submitted a RMP 5-year update (40 C.F.R 68.190(b)(1)) on December 8, 2017. This re-submission listed six covered processes containing four regulated toxic chemicals (methyl mercaptan, hydrogen sulfide, acrolein, carbon disulfide) and two regulated flammable chemicals (propane, ethyl mercaptan). This 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 submit the data elements from 40 C.F.R § 68.175 in their RMP.

40 C.F.R. § 68.15 Management – Arkema Beaumont has developed a management system to oversee the implementation of risk management program elements and provided an organization chart that defines the lines of authority for each individual requirement. Arkema Beaumont has assigned the Plant Manager as the qualified person/position that has the overall responsibility for the development, implementation and integration of the RMP elements.

Subpart B – Hazard Assessment

40 C.F.R. § 68.20 Applicability – Arkema Beaumont is a program level three (3) stationary source subject to this subpart. Arkema Beaumont is required to prepare an offsite consequence analysis and complete the five-year accident history.

40 C.F.R. § 68.22 Offsite Consequence Analysis Parameters – I reviewed and discussed Arkema Beaumont's offsite consequence analysis and supporting documentation. The facility uses RMP*Comp™ to document endpoints for offsite consequence analyses for both worst-case and alternative release scenarios from the rule. RMP*Comp™ ensures the appropriate wind speeds and stability classes for the release analyses, ambient temperatures and humidity values for release analyses, values for height of the release for the release analyses, and surface roughness values for the release scenarios with parameters specified by EPA.

40 C.F.R. § 68.25 Worse-case Release Scenario Analysis – Arkema Beaumont analyzed and reported in the RMP two worst-case release scenarios estimated to create the greatest distance to endpoint resulting from an accidental release of a regulated toxic substance and six worst-case release scenarios estimated to create the greatest distance to endpoint resulting from an accidental release of a regulated flammable substance. Each scenario was determined based on the greatest quantities held in a single vessel, considering administrative controls that limit the maximum quantity. The facility used the modeling technique RMP*Comp™ to determine the rate of release to air for all scenarios.

40 C.F.R. § 68.28 Alternative Release Scenario Analysis – Arkema Beaumont identified and analyzed at least one alternative release scenario for each regulated toxic substance held in a covered process and at least one alternative release scenario to represent all flammable substances held in covered processes. The facility examined six models total, all having a scenario with the greatest occurrence being a 0.5-inch hose rupture based on the facility's recommendations. The facility used the modeling technique RMP*Comp™ to determine the rate of release to air for all scenarios. While reviewing both facility provided documentation, as well as the current RMP re-submission, it was confusing as to how many models were run for toxic and flammable substances, but there was at least one scenario for each toxic and flammable. The release scenario analyses could be simplified for more clarity.

40 C.F.R. § 68.30 Defining Offsite Impacts - Population – Arkema Beaumont uses the Mapping Application for Response, Planning, and Local Operational Tasks (MARPLOT) software to estimate the population that would be included in the distance to endpoint in the RMP based on a circle with the center of the facility at the center due to the small site size, not the release point [AOC 1]. The MARPLOT image identified the presence of institutions, parks and recreational areas, major commercial, office, and industrial buildings in the RMP and listed the estimated population using the most recent (2010) Census. "Arkema chose the facility's center point as the release location because of the facility's small size and the proximity of the RMP processes to each other. The alternative scenarios are based on potential 0.5-inch release cases identified in a Baker Risk study, which does not specify exact release locations. Arkema re-plotted all of the alternative release scenarios in MARPLOT at their respective unit centers and the worst-case scenarios at their respective locations. Based on this re-plotting, Arkema has determined that the only RMP representations affected by the revised analysis are the estimated residential population numbers." -Arkema statement.

40 C.F.R. § 68.33 Defining Offsite Impacts - Environment – Arkema Beaumont used MARPLOT to identify environmental receptors that would be included in the distance to endpoint based on a circle with the center of the facility at the center due to the small size of the site, not the release point [AOC 1].

40 C.F.R. § 68.36 Review and Update – Arkema Beaumont documented that the off-site consequence analyses are reviewed and updated, at least once every five years, and within six months of a change that might reasonably be expected to increase or decrease the distance to the endpoint, by a factor of two or more.

40 C.F.R. § 68.39 Documentation – For the worst-case and alternative case scenarios, a description of the vessel or pipeline, the substance selected as worst-case, and the rationale for selection was included; likewise, assumptions included use of any administrative controls and any passive mitigation that were assumed to limit the quantity that could be released, estimated quantity released, release rate, and duration of release. The RMP*Comp™ methodology used to determine distance to endpoint

was documented by the facility along with associated MARPLOT documentation used to determine population and environmental receptors potentially affected.

40 C.F.R. § 68.42 Five-year accident history – Arkema Beaumont reported one accidental release caused by an equipment failure in their RMP that resulted in property damage at the time of their last re-submission which occurred on May 2, 2011.

Subpart D – Program 3 Prevention Program

40 C.F.R. § 68.65 Process Safety Information – Arkema Beaumont complied 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. The process safety information contained Safety Data Sheets (SDSs), 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. The facility documented information pertaining to the technology of the process including a block flow diagram, process chemistry, maximum intended inventory, safe upper and lower limits, and an evaluation of consequences of deviation. The facility also compiled safety information that contained materials on construction, piping and instrumentation diagrams (P&IDs), electrical classification, relief system design and design basis, ventilation system design, design codes and standards employed, material and energy balances for processes and safety systems. The facility stated that equipment complies with recognized and generally accepted good engineering practices (RAGAGEP) via design codes such as American Petroleum Industry (API) codes.

40 C.F.R. § 68.67 Process hazard analysis (PHA) – Arkema Beaumont had performed an initial PHA, and this analysis identified, evaluated, and controlled the hazards involved in the process. The facility has five RMP PHAs on an alternating cycle. I requested and reviewed the PHA for the acrolein process. The acrolein process, as well as other facility PHAs, were completed using the Hazard and Operability Study (HAZOP)/Layers of Protection Analysis (LOPA) technology. Every 10 years, the facility does a redo of each PHA from scratch followed by a revalidation 5 years later. The PHA addresses hazards of the process, identification of any incident that had a likely potential for catastrophic consequences, engineering and administrative controls applicable to hazards and interrelationships, consequences of failure of engineering and administrative controls, stationary source siting, human factors and an evaluation of a range of the possible safety and health effects of failure of controls. The PHA team consists of Arkema Beaumont personnel. Arkema Beaumont uses IMPACT software as a system to promptly address the team's findings and recommendations; assured that the recommendations are resolved in a timely manner and documented; documented what actions are to be taken; completed actions as soon as possible; developed a written schedule of when these actions are to be completed; and communicated the actions to operating, maintenance, and other employees whose work assignments are in the process and who may be affected by the recommendations. Arkema Beaumont failed to update and revalidate one RMP PHAs every 5 years after the completion of the initial PHA to assure that the PHA is consistent with the current process. The following PHA was not completed every five years: Acrolein including T.O.: 2009 and 2016. **[AOC 2]** The facility has retained PHAs and 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 – Arkema Beaumont has developed and implemented written operating procedures that provide instructions or steps for conducting activities associated with each covered process consistent with the safety information. The facility organizes operating procedures in three categories: critical procedures, emergency procedures and routine procedures. I viewed selected operating procedures to identify steps for each operating phase (initial startup, normal operations, normal shutdown and startup following a turnaround or after emergency shutdown). I reviewed the facility's procedures to ensure they addressed operating limits as well as safety and health considerations. Operating procedures are accessible to employees via Arkema Beaumont's SharePoint site so that all employees, especially those involved in a process, have access. Arkema Beaumont did not certify annually that the operating procedures are current and accurate. The annual certifications for procedures were certified on July 10, 2015; October 18, 2016; December 4, 2017 and April 30, 2018. **[AOC 3]** I reviewed Arkema Beaumont's general plant procedure that was developed to implement safe work practices to provide for the control of hazards during specific operations, such as lockout/tagout and confined space.

40 C.F.R. § 68.71 Training – Arkema Beaumont's training coordinator discussed how each employee involved in operating a process was initially trained in an overview of the process and in the operating procedures including emphasis on safety and health hazards and emergency operations. Refresher training had not been provided at least every three years to one of the three employees whose training records I reviewed. **[AOC 4]** I reviewed Arkema Beaumont's training procedure that described how each employee involved in operating a process has received and understood that training through a mixture of examinations with a 90% pass score requirement and on-the-job training. Each training record reviewed contained the needed elements and was stored in an online repository called "Successfactors".

40 C.F.R. § 68.73 Mechanical Integrity (MI) – Arkema Beaumont established procedures to maintain the on-going integrity of the process equipment listed in 68.73(a). The facility has a MI Written Procedures index that lists approximately 30 procedures with corresponding forms. The facility contracts out all MI training and uses site personnel in a supervisory role. The facility uses API standards for inspection and testing procedures of process equipment. Arkema Beaumont failed to ensure the frequency of inspections and tests of process equipment is consistent with applicable manufacturers' recommendations and API standards. The site provided me with a list of 138 overdue equipment inspections. After a second review, Arkema Beaumont found a total of 128 RMP equipment inspections were found to be overdue. **[AOC 5]** During the inspection, I discussed with personnel the completion of these past due inspections regarding the current turnaround. Initially, there were inspections anticipated to be remaining after the turnaround. However, on October 3, 2018, Arkema Beaumont's Plant Manager called to update me that the facility made the decision to complete all past due inspections during the turnaround. All of these overdue inspections were completed during turnaround. The facility's next phase includes implementation of Risk Based Inspections (RBI). The facility has several corrosion procedures and has implemented corrosion studies to establish corrosion rates on process equipment.

40 C.F.R. § 68.75 Management of Change (MOC) – Arkema Beaumont has established written procedures to manage changes to process chemicals, technology, equipment, procedures, personnel and changes to stationary sources that affect a covered process (Beaumont Management of Changing PSM-100). I reviewed the procedure and several MOCs to assure the necessary considerations were addressed prior to any change including: the technical basis for the proposed change, impact of change on safety and health, modifications to operating procedures, necessary time period for change and the

proper authorization requirements. The facility provided documentation that assured employees who would be affected were informed and trained in the change prior to start-up via the MOC Beaumont Acknowledgement Tool, as well as the updates made to PSI and operating procedures. The facility uses IMPACT Enterprise software system to initiate, approve and track any eMOC from initiation to closure. MOC levels are designated into categories: Level 1 (minor not requiring a PSSR), 2 (minor) and 3 (major).

40 C.F.R. § 68.77 Pre-startup Safety Review (PSSR) – I reviewed Arkema Beaumont’s procedure to assure that when the facility installed a new stationary source, or significantly modified an existing source, that a review was implemented prior to the introduction of the newly regulated substance. A PSSR is required for all level 2 (minor) and level 3 (major) changes. Level 1’s does not require a PSSR. PSSRs should not be initiated without MOC approval. The MOC initiator must ensure that the PSSR is conducted prior to start-up of any change implemented and ensure all appropriate pre- start-up action items have been completed. Arkema Beaumont’s current software defaults the time period for PSSR changes at 90-days for all changes initiated on May 8, 2018 and before. A PSSR can be re-issued for an additional 90-days, if needed.

40 C.F.R. § 68.79 Compliance Audits – Arkema Beaumont provided me with their two most recent compliance audit reports dated July 13-16, 2015, and May 7-11, 2018. The audits were conducted by an audit team consisting of a third-party consultant, Beaumont staff personnel and Arkema corporate HSE personnel. The reports documented findings with an appropriate response to each of the findings. The facility uses IMPACT Sphere to track audit findings to assure that deficiencies have been corrected.

40 C.F.R. § 68.81 Incident Investigation – Arkema Beaumont provided me with the requested list of incident reports/investigations for all incidents which resulted in, or could reasonably have resulted in, a catastrophic release of a regulated substance that had been prepared after every investigation over the last five years pertaining to this subpart. Incident investigations are stored in the facility’s IMPACT system. IMPACT serves as the repository for incidents to address and resolve incident action items and store relevant information. All incidents I reviewed were initiated no later than 48 hours following the incident. Arkema Beaumont’s incident investigation team is selected depending on the severity of the incident. The facility has monthly “loss control” meetings to communicate incidents and PHA results to affected personnel.

40 C.F.R. § 68.83 Employee Participation – I reviewed Arkema Beaumont’s written plan of action regarding the implementation of the employee participation required by this subpart.

40 C.F.R. § 68.85 Hot Work Permit – I reviewed Arkema Beaumont’s Hot Work Fire Prevention procedure. The facility issues hot work permits for hot work operations conducted on or near a covered process that are for the duration of the shift being issued. I reviewed two recently conducted hot work permits to assure that each permit indicated the date authorized for the hot work and that the permit documents that the fire prevention and protection requirements in 29 C.F.R. 1910.252 (a) were implemented. The facility keeps each hot work permit onsite for three years and five years total.

40 C.F.R. § 68.87 Contractors – Arkema Beaumont uses a third-party administrator and information verification company to provide them with efficient ways to collect, verify, and maintain accurate records of a supplier/vendor’s prequalification, and related information to evaluate information regarding the contractor’s performance when selecting a contractor. The third-party administrator annually evaluates the performance of the contractors. Prior to arrival at the facility, contractors will

have received a briefing of potential hazards and overview of the facility. The contractors then meet with facility personnel for remaining site-specific training. Arkema Beaumont personnel stated that contractors are advised not to respond to emergencies. This Arkema Beaumont facility implements standards of the Chemical Facility Anti-Terrorism Standards (CFATS) government security regulations to control the entrance, presence, and exit of the contractors in covered process areas.

Subpart E – Emergency Response

40 C.F.R. § 68.90 Applicability – The Arkema Beaumont facility is designated as a “first responder” in case of an accidental release of regulated substances.

40 C.F.R. § 68.95 Emergency Response Program – I reviewed and discussed Arkema Beaumont’s Emergency Response Plan. The response plan constantly evolves and improves based on updates from feedback of conducted drills and incidents. Arkema Beaumont’s employees are first responders that may respond to fires, explosions, hazmat, rescue, bomb threats, medical emergencies and any foreseeable events that occurs onsite. The facility uses the Southeast Texas Alerting Network (STAN) community notification network line to coordinated responses to external partners managed through the Jefferson County Local Emergency Planning Committee (LEPC) and the Sabine Neches Chiefs Association (SNCA). They are a mutual aid participant within the Sabine Neches Chiefs. The facility has quarterly drills scheduled to anticipate real events based on worst-case scenario events, evacuation, hazmat and fire. The facility incorporates various elements into drills to simulate real events. Employees who are first responders are required to have Hazardous Waste Operations and Emergency Response (HAZWOPER) initial and refresher trainings in addition to skill specific training, such as rescue and advanced medical providers. The Plant Manager/HSE Manager attends LEPC meetings on behalf of the site.

Subpart G – Risk Management Plan

40 C.F.R. § 68.190 Updates – Arkema Beaumont’s RMP was re-submitted per the 5-year update (40 C.F.R. 68.190(b)(1)) on December 8, 2017.

40 C.F.R. § 68.195 Required corrections – Arkema Beaumont’s next RMP re-submission is due by December 8, 2022, unless an update or correction is required by 40 C.F.R. 68.190 and 40 C.F.R. 68.195.

Closing Meeting —A closing meeting was held to discuss Areas of Concern, recommendations, and the process of completing the inspection report.

Table 2: Closing Meeting Attendance, Wednesday September 26, 2018

NAME	POSITON
Justin McDowell	USEPA Inspector
Jeff McHenry	Plant Manager
Bret Duplant	HSE Manager
Scott Frost	Operations Manager
Hassan Samatar	Process Technology Manager
Katherine Prem	Process Safety Manager
Patrick Gonzales	Environmental Team Lead
Harry Yekel	Corporate- Principal Environmental Engineer
Didier Auber	Thiochemical Manufacturer Director

Section III – AREAS OF CONCERN

AOC 1 – 40 C.F.R. § 68.30 (a)/ § 68.33 (a) Hazard Assessment

“§ 68.30 (a) The owner or operator shall estimate in the RMP the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in §68.22(a).”

Arkema Beaumont uses the Mapping Application for Response, Planning, and Local Operational Tasks (MARPLOT) software to estimate the population that would be included in the distance to endpoint in the RMP based on a circle with the center of the facility at the center due to the small site size, not the release point.

“§ 68.33 (a) The owner or operator shall estimate in the RMP environmental receptors within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in §68.22(a) of this part.”

Arkema Beaumont used MARPLOT to identify environmental receptors that would be included in the distance to endpoint based on a circle with the center of the facility at the center due to the small size of the site, not the release point.

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

“(f) At least every five (5) years after the completion of the initial PHA, the PHA shall be updated and revalidated by a team meeting the requirements in paragraph (d) of this section, to assure that the process hazard analysis is consistent with the current process. Updated and revalidated process hazard analyses completed to comply with 29 CFR 1910.119(e) are acceptable to meet the requirements of this paragraph.”

Arkema Beaumont failed to update and revalidate two RMP PHAs every 5 years after the completion of the initial PHA to assure that the PHA is consistent with the current process. The following PHA was not completed every five years: Acrolein including T.O.: 2009 and 2016.

AOC 3 – 40 C.F.R. § 68.69 (c) Operating procedures

“(c) 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.”

Arkema Beaumont did not certify annually that the operating procedures are current and accurate. The annual certifications for procedures were certified on July 10, 2015; October 18, 2016; December 4, 2017 and April 30, 2018.

AOC 4 – 40 C.F.R. § 68.71 (b) Training

“(b) *Refresher training.* Refresher training shall be provided at least every three years, and more often if necessary, to each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process. The owner or operator, in consultation with the employees involved in operating the process, shall determine the appropriate frequency of refresher training.

Refresher training had not been provided for at least every three years to one of the three employees whose training records were reviewed.

AOC 5 – 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.”

Arkema Beaumont failed to ensure the frequency of inspections and tests of process equipment is consistent with applicable manufacturers’ recommendations and API standards. The site provided me with a list of 128 overdue equipment inspections.

Section IV – FOLLOW UP

At the conclusion of the inspection, I requested specific documents reviewed onsite and was provided those documents on September 26, 2018.

On October 3, 2018, Arkema Beaumont’s Plant Manager called to update me that the facility made the decision to complete all past due inspections during the turnaround.

On October 29, 2018, Arkema Beaumont provided comments regarding this report and supplemental documentation related to compliance of this CAA 112(r) inspection.

Section V – LIST OF APPENDICES

N/A.