United States Environmental Protection Agency

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	December 8-11, 2025	
Media Program:	Air	
Regulatory Program(s)	Clean Air Act (CAA) Section 112(r) and 40 Code of Federal Regulations (C.F.R.) Part 68 Chemical Accident Risk Management Plan (RMP)	
Company Name:	**PVS CHEMICALS, INC.**	
Facility Name:	**PVS DX, INC.**	
Facility Physical Location:	1919 Jacintoport Blvd.	
(city, state, zip code)	Houston, Texas 77015	
Mailing address:	1919 Jacintoport Blvd	
(city, state, zip code)	Houston, Texas 77015	
County/Parish:	Harris	
Facility Phone Number	281-457-4835	
Facility Contact:	Ellen Beverly	EHSS Specialist
	ebeverly@dxgroup.com	
FRS Number:	1000 0008 4259	
Identification/Permit Number:	N/A	
Media Identifier Number:	RMP 1000 0014 1526	
NAICS:	42469	
SIC:	N/A	

Personnel participating in inspection:		
Christina Golden	PVS DX, INC.	Operations Manager
Brad Dubose	PVS DX, INC	Training Manager
Ellen Beverly	PVS DX, INC.	EHS Specialist
Sherronda Phelps	US EPA	CAA Inspector

EPA Lead Inspector Signature/Date	Sherronda Phelps	1/29/2026
	Sherronda Phelps	Date
Supervisor Signature/Date	KAYLA BUCHANAN Digitally signed by KAYLA BUCHANAN Date: 2026.01.29 10:38:45 -06'00'	
	Kayla Buchanan	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector, Sherronda Phelps (I), arrived at the PVS Chemicals, INC./PVS DX, INC. at 10:00 AM on December 8, 2025, for an announced inspection. I met Ellen Beverly, EHS Specialists, and other representatives at the Opening Conference. I presented my credentials to all present and informed them that this was an EPA inspection to determine compliance with CAA Section 112(r)(1) and 112(r)(7). The scope of the inspection was a partial compliance evaluation (PCE) and included evaluation of the compliance of the facility with 40 C.F.R. Subpart 68 – Chemical Accident Prevention Provisions. An employee representative was invited to participate in the inspection; however, this site is a non-union facility.

FACILITY DESCRIPTION

According to the facility's executive summary, PVS DX primary activities include distributing and repackaging inorganic chemicals including compressed gases for use in water and wastewater treatment. The only chemicals meeting the threshold quantity as determined under 40 CFR § 68.115 is Chlorine and Sulfur Dioxide(anhydrous). The facility employs approximately 65 full-time employees (FTE's).

Section II - OBSERVATIONS

The initial documentation review began in person with Christina Golden (Operations Manager), Ellen Beverly (EHSS Specialist), and Brad DuBose (Training Manager). See sign in sheets for the personnel who participated during the inspection (Appendix A). A facility site tour took place on December 9, 2025 to observe the flow of the process operation.

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

Subpart A – General

40 C.F.R. § 68.10 Applicability – PVS DX, INC. is a stationary source that has more than a threshold quantity of regulated substances in their process. The last submittal was made May 20, 2022, due to the five-year resubmission date. PVS DX Industries 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 CFR § 1910.119).

40 C.F.R. § 68.12 General requirements – PVS DX submitted their most recent RMP submission on May 20, 2022. The regulated substance(s) chlorine and sulfur dioxide (toxics) are the regulated substances listed over the threshold quantity for the RMP Program Level 3 processes.

40 C.F.R. § 68.15 Management – PVS DX developed a management system to oversee the implementation of the risk management program elements. PVS DX 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 – PVS DX 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 – PVS DX 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 – PVS DX 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 – PVS DX 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 – PVS DX 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 – PVS DX 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 - PVS DX 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 2027.

40 C.F.R. § 68.39 Documentation - PVS DX 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 - PVS DX reported an incident that occurred on October 10, 2022, where an employee inhaled chlorine vapor with the disconnection of a fill line without completing a leak check as required by the operating procedure. The incident was documented and investigated, and employees were retrained in November 2022, from the records reviewed during the onsite inspection.

Subpart D – Program 3 Prevention Program

40 C.F.R. § 68.65 Process safety information (PSI) - I reviewed various sections of the process safety information (PSI) for the RMP covered process at PVS DX. There were no areas of concern identified.

40 C.F.R. § 68.67 Process Hazard Analysis (PHA) - I reviewed the PHAs conducted for the Sulfur Dioxide and Chlorine packaging processes. Specifically titled: "Sulfur Dioxide Repacking and Sulfite Manufacturing and Compressed Gas Warehousing Process Hazard Analysis (11/2022)" and "Chlorine Packaging, Bleach Manufacturing, and Compressed Gas Warehousing Process Hazard Analysis (10/2022)". The next revalidation is set for the last quarter of 2027. The PHA study was conducted using What-if, Checklist, and the Hazard and Operability Analysis (HAZOP) method. All recommendations noted were completed as scheduled.

40 C.F.R. § 68.69 Operating procedures - I reviewed several operating procedures for the covered process. I reviewed and discussed with PVS DX personnel operating procedures, which included the Standard Operating Procedure (SOP) certification procedure, confined space entry, and lockout/tag out procedures. PVS DX certified that the operating procedures were current, accurate, and that the procedures were reviewed as often as necessary, as required by this subpart, and used a single certification document for operating procedures annually. Hard copies of the operating procedures are available in control room for operators. No areas of concern were identified with this subpart.

40 C.F.R. § 68.71 Training - I requested training records for review and was provided the files for several employees at different experience levels. Of the employee files I reviewed, all took the initial training to operate within the unit and should be up for refresher training later this year while others are scheduled to refresh well into the year 2026. Training was a combination of classroom and hands on. There were no areas of concern identified.

40 C.F.R. § 68.73 Mechanical integrity - I reviewed mechanical integrity records for randomly selected inspections of RMP covered process equipment and the written procedure for maintaining the integrity of the process. EPA requested a list of past due/overdue MI inspections. There were none to populate from that query. EPA reviewed records on PVS DX's critical equipment list and their historical inspection details. There were no areas of concern identified.

40 C.F.R. § 68.75 Management of change (MOC) – EPA discussed PVS DX's written procedure for MOC and the documentation with site personnel. The MOCs were implemented using an electronic System, Reliance. I reviewed several MOCs to evaluate the implementation of the procedures in place. No areas of concern were identified.

40 C.F.R. § 68.77 Pre-startup safety review – PVS DX provided documentation regarding pre-startup safety review which accompanied several MOC's reviewed, all PSSR requirements were satisfied before startup.

40 C.F.R. § 68.79 Compliance audits – EPA requested the two most recent compliance audits for review. PVS DX provided compliance audit reports completed on April 2022 and April 2025. Action Items from the audit were placed in the electronic tracking system titled Safety Amp. I followed up on several items from the most recent audit to observe PVS DX's follow through, and implementation of each action item created. PVS DX brought each action item to a close in a timely manner as required by the regulation.

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. All incident investigations appear to have been conducted as required per the subpart.

40 C.F.R. § 68.83 Employee participation – PVS DX implemented the requirements of this subpart.

40 C.F.R. § 68.85 Hot work permit - PVS DX discussed the process for conducting hot work onsite and several hot work permits were reviewed. All permits are scanned into Safety Amp upon completion and are kept one year on site and archived into Safety Amp.

40 C.F.R. § 68.87 Contractors – PVS DX hires contractors on occasion to conduct specific maintenance and construction activities. Prior to selecting a contractor, a thorough evaluation of safety performance of the contractor is carried out. The company has a strict policy of informing the contractors of known potential hazards related the contractor's work and the processes. Contractors are also informed of all the procedures for emergency response should an accidental release of a regulated substance occur. No areas of concern were identified.

Subpart E – Emergency Response

40 C.F.R. § 68.90 Applicability – PVS DX is a “non-responding” stationary source in case of an accidental release of a regulated substance, therefore, the facility need not comply with the requirements of part 68.95.

40 C.F.R. § 68.93 Emergency Response Coordination Activities – PVS DX coordinates with the local emergency planning and response organizations to ensure that local response organization are aware of the regulated substances of the stationary source. I reviewed PVS DX coordination notification documentation which included the names of the individuals involved, their contact information, dates of the coordination activities, and the nature of the coordination activities. PVS DX coordinates with the local authorities in the city at least annually. I reviewed the facility’s Emergency Response Drill forms. The facility conducts drills on a quarterly basis that consist of exercises such as: air monitoring, entry control, medical checks, decontamination, and HAZMAT immediate control.

40 C.F.R § 68.96 Emergency response exercises – As part of coordination with local emergency response officials required by § 68.93, PVS DX consult with officials to establish an appropriate frequency for tabletop exercises. In addition, PVS DX provided notification exercises dates and indicated that notification exercises are conducted on an annual basis.

Subpart G – Risk Management Plan

40 C.F.R. § 68.190 Updates – There have been no recent additions or upgrades to the unit that would have triggered an update to the Risk Management Plan.

40 C.F.R. § 68.195 Required corrections -The next RMP re-submission is due by May 20, 2027, unless an update or correction is required by 40 C.F.R. § 68.190 and § 68.195.

Section III – AREAS OF CONCERN

I observed no areas of concern at the time of the inspection.

Closing Conference

EPA Region 6 inspector, Sherronda Phelps, conducted a closing conference at PVS Chemicals, Inc./at 11:30 AM on December 11, 2025, for the inspection. During the closing conference, EPA reviewed the elements of the RMP covered during the inspection, field questions from facility personnel, and provided information about the next steps in the inspection process.

Section IV – FOLLOW UP

No additional information was requested or received by EPA after exiting the Facility on December 11, 2025.

Section V – LIST OF APPENDICES

Appendix A – Opening and closing conference sign-in sheets

There are no photos, videos, or other appendices to the report.

APPENDIX A

12/8/25

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
SHERRONDA PHELPS	US EPA	EPA INSPECTOR
BRAD DuBose	PVS DX	TRAINING MGR.
Christine Golden	PVS DX	Operation Manager
Ellen Beverly	PVS DX	EHS Specialist

10/9/25

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~~ Company
SHEKONDA PHELPS	CAA INSPECTOR	USEPA
Christina Gelda	Operation Manager	
Ellen Beverly	EHS Specialist	Company
Jason Wisdom	Process Safety & Emergency Response Mgr	

12/10/25

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~~ Company
Sherronda Phelps	CAA INSPECTOR	US EPA
Ellen Beverly	EHS Specialist	PVS DX
Christina Golden	Operation Manager	PVS DX
Isaac Vargas	Engineering	PVS DX

12/11/25

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
SHEKKOLDA PHELPS	US EPA	CAA INSPECTOR
Ellen Beverly	PVS DX	EHS Specialist
Christina Golden	PVS DX	Operation Manager