STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

* Settlement Tracking No.

* SA-AE-22-0092

LINDE INC. F/K/A PRAXAIR, INC.

* Enforcement Tracking No.

AI # 2218 * AE-CN-18-00478

*

PROCEEDINGS UNDER THE LOUISIANA

ENVIRONMENTAL QUALITY ACT

LA. R.S. 30:2001, <u>ET SEQ.</u>

* Docket No. 2021-0515-DEQ

SETTLEMENT

The following Settlement is hereby agreed to between Linde Inc. f/k/a Praxair, Inc. ("Respondent") and the Department of Environmental Quality ("DEQ" or "the Department"), under authority granted by the Louisiana Environmental Quality Act, La. R.S. 30:2001, et seq. ("the Act").

Ι

Respondent is a corporation that owns and/or operates an industrial gas and chemical manufacturing facility located in Geismar, Ascension Parish, Louisiana ("the Facility").

II

On November 1, 2019, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement Tracking No. AE-CN-18-00478 (Exhibit 1).

Ш

In response to the Consolidated Compliance Order & Notice of Potential Penalty, Respondent made a timely request for a hearing.

ΙV

Respondent denies it committed any violations or that it is liable for any fines, forfeitures

and/or penalties.

V

Nonetheless, Respondent, without making any admission of liability under state or federal statute or regulation, agrees to pay, and the Department agrees to accept, a payment in the amount of FOURTEEN THOUSAND FIVE HUNDRED AND NO/100 DOLLARS (\$14,500.00), of which One Thousand Four and 92/100 Dollars (\$1,004.92) represents the Department's enforcement costs, in settlement of the claims set forth in this agreement. The total amount of money expended by Respondent on cash payments to the Department as described above, shall be considered a civil penalty for tax purposes, as required by La. R.S. 30:2050.7(E)(1).

VI

Respondent further agrees that the Department may consider the inspection report(s), the Consolidated Compliance Order & Notice of Potential Penalty and this Settlement for the purpose of determining compliance history in connection with any future enforcement or permitting action by the Department against Respondent, and in any such action Respondent shall be estopped from objecting to the above-referenced documents being considered as proving the violations alleged herein for the sole purpose of determining Respondent's compliance history.

VII

This agreement shall be considered a final order of the Secretary for all purposes, including, but not limited to, enforcement under La. R.S. 30:2025(G)(2), and Respondent hereby waives any right to administrative or judicial review of the terms of this agreement, except such review as may be required for interpretation of this agreement in any action by the Department to enforce this agreement.

This settlement is being made in the interest of settling the state's claims and avoiding for both parties the expense and effort involved in litigation or an adjudicatory hearing. In agreeing to the compromise and settlement, the Department considered the factors for issuing civil penalties set forth in La. R. S. 30:2025(E) of the Act.

IX

As required by law, the Department has submitted this Settlement Agreement to the Louisiana Attorney General for approval or rejection. The Attorney General's concurrence is appended to this Settlement Agreement.

X

The Respondent has caused a public notice advertisement to be placed in the official journal of the parish governing authority in Ascension Parish, Louisiana. The advertisement, in form and wording approved by the Department, announced the availability of this settlement for public view and comment and the opportunity for a public hearing. Respondent has submitted an original proof-of-publication affidavit and an original public notice to the Department and, as of the date this Settlement is executed on behalf of the Department, more than forty-five (45) days have elapsed since publication of the notice.

ΧI

Payment is to be made within ten (10) days from notice of the Secretary's signature. If payment is not received within that time, this Agreement is voidable at the option of the Department. Payments are to be made by check, payable to the Department of Environmental Quality, and mailed or delivered to the attention of Accountant Administrator, Financial Services Division, Department of Environmental Quality, Post Office Box 4303, Baton Rouge, Louisiana, 70821-4303. Each

payment shall be accompanied by a completed Settlement Payment Form attached hereto.

XII

In consideration of the above, any claims for penalties are hereby compromised and settled in accordance with the terms of this Settlement.

XIII

Each undersigned representative of the parties certifies that he or she is fully authorized to execute this Settlement Agreement on behalf of his or her respective party, and to legally bind such party to its terms and conditions.

LINDE INC. F/K/A PRAXAIR, INC.

(Signature)
TOOD SALFRAD
(Printed)
TITLE: EXECUTIVE AREGON OF GARATIONS
THUS DONE AND SIGNED in duplicate original before me this 28 day of June, 20 23, at The Woodlands, TX.
NOTARY PUBLIC (ID #13 0674000)
SULEYMA ORTIZ Notary Public, State of Texas Comm. Expires 05-24-2024 Notary ID 130674000 (stamped of Partiel)
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY Roger W. Gingles, Secretary
Celena I. Cage, Assistant Secretary Office of Environmental Compliance
THUS DONE AND SIGNED in duplicate original before me this day of, 20, at Baton Rouge, Louisiana.
NOTARY PUBLIC (ID # 51205)
DEIDRA JOHNSON NOTARY PUBLIC EAST BATON ROUGE PARISH LOUISIANA NOTARY ID NO. 51205
Approved: Lew J. Cage, Assistant Secretary (stamped or printed)

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY OFFICE OF ENVIRONMENTAL COMPLIANCE

ENFORCEMENT DIVISION POST OFFICE BOX 4312

l.

CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY



BATON ROUGE, LOUISIANA 70821-4312

Enforcement Tracking No.	AE-CN-18-00478	Certified Mail No.	7018 2290 0000 5826 1364	
Agency Interest (AI) No.	2218	Contact Name	Christopher Clement	
Alternate ID No.	0180-00031	Contact Phone No.	(225) 219-3748	
Respondent:	PRAXAIR, INC.	Facility Name:	Geismar Plant	
	c/o The Prentice-Hall Corporation System, Inc	Physical Location:	9154 Louisiana Highway 75	
	Agent for Service of Process			
4,	501 Louisiana Avenue	City, State, Zip:	Geismar, LA 70734	
	Baton Rouge, LA 70802	Parish:	Ascension	

This CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY is issued by the Louisiana Department of Environmental Quality (the Department), under the authority granted by the Louisiana Environmental Quality Act (the Act), La. R.S. 30:2001, et seq., and particularly by La. R.S. 30:2025(C), 30:2050.2 and 30:2050.3(B).

FINDINGS OF FACT

An authorized representative of the Department inspected the abovementioned facility or conducted a file review of the facility to determine the degree of compliance with regulations promulgated in the Louisiana Administrative Code, Title 33. The State regulatory citations for the violation(s) identified during the inspection and/or file review are indicated below.

The Respondent owns and/or operates Praxair, Inc. - Geismar Plant (facility), an industrial gas and chemical manufacturing facility, located at 9154 Louisiana Highway 75, in Geismar, Ascension Parish, Louisiana. The facility is subject to 40 CFR 68 Program Level 3 Chemical Accident Prevention Provisions (CAPP) and operates or has operated under the following permits:

Title V Air Permit No.	Date Issued	Expiration Date
0180-00031-V9	June 14, 2019	June 14, 2024
0180-00031-V8	May 23, 2017	October 31, 2018
0180-00031-V7	November 3, 2015	October 31, 2018
0180-00031-V6	October 31, 2013	October 31, 2018
0180-00031-V5	May 12, 2011	July 21, 2014
0180-00031-V4	December 23, 2010	July 21, 2014
0180-00031-V3	July 21, 2009	July 21, 2014
0180-00031-V2	January 10, 2008	January 10, 2013
0180-00031-V1	July 18, 2003	July 18, 2008
0180-00031-V0	January 21, 1997	January 21, 2002

	Date of Violation	Description of Violation
11.	Inspection(s) October 3-5, 2017	The Respondent failed to have an accurate relief system design basis for each Pressure Safety (Relief) Valve (PSV). Specifically, documentation of relief system design basis for three PSV's was inaccurate or not available. PSV 5314 had relief system design basis calculations; however, they were inaccurate because they failed to account for inlet pressure drop. There were no relief system design basis calculations performed for PSV 802 A/B and PSV 099. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.65(d)(1)(iv), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
 ,	Inspection(s) October 3-5, 2017	The Respondent failed to include information on ventilation system design in process safety information. Specifically, the process safety information for the control room ventilation unit only included a drawing, and there were no calculations to ensure the ventilation system provides sufficient air changes. Additionally, there was no documentation that the control room is explosion-proof. The material safety data sheet for Syngas by Air Products specifies ventilation systems should meet the National Electrical Code (NEC) requirements for Class 1, Group B areas. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.65(d)(1)(v), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). During the inspection, the Respondent performed calculations for air changes per hour for the control room ventilation system.
IV.	Inspection(s) October 3-5, 2017	The Respondent failed to identify previous incidents in the 2009 revalidation Process Hazard Analysis (PHA). The PHA listed thirteen (13) action items; however, after further review, the Respondent stated that was an error and that there was only one (1) action item: Check safeguard PSXL-5133. The Respondent stated the person entering the information into the system did not know how to use the program, and therefore created the extra entries. However, the inspector discovered six (6) additional open action items: 1) verify temperature indicator TI-6043 2) consider toxic gas monitoring for cooling tower 3) check on high pressure protection for fuel to burner 4) review piping and instrumentation diagram (P&ID) for accuracy 5) two (2) valves labeled the same — V-1643A

EXHIBIT 1

AE-CN-18-00478 CO FORM 2

The Respondent Studies of the any documentation that the action items had been assigned, given due states, or were addressed/competed. Further, the Respondent Could not provide the stark insides mixing malific the beaction felies. This is a violation of Specific Requirement to, 351 of this VAR Permit No. (9.090-0031-V3, 40 CPR 40 CFR 58-KP(¢2), Wilch language has been adopted as a toulistan regulation in IAC 3311-8500, IAC 3811-8500, CA, and Iz. R. S. 2005/76/[A]Z. The Imagestor rendewing the above its view addressing attom is the processing of the stark of			
given dus dates, or were additissed/completed. Further, this Respondent could not provide the risk intalking mistric for the action Reins. This is a violation of specific Requisitement to, 351 of Title V Air Permit Mo, 0180-00031479, 40 CFR 68-67(c)21, which instrugage has been adopted as a toolstan regulation in IAC 3311/5001, LAC 3311/5001, LAC, 3911.8-10, 2002/57(A)27. The impector verdewed the above action Reins with the Respondent's representative who agreed the above issue with every additional stipin Reins. Inspection(a) The Respondent failed to perform a siting study during the 2007 revalidation PIAC 118 of Complete 3-5, 40 CFR 68-67(c)(5), which iniguage has been adopted as a Coustiana regulation in IAC 33.118501. AC 3311501.C AC 3311501.			
risk rinking riskty for the action items, This is a violation of Specific Requirigement to, 35.1 of Title V.A.P. remit Mc, 0.180 0.031.1/3, ALC 93.11.501.C.A; and Is. R.S. 300.057(A)(A). The Impector reviewed the above action items with the Respondent's representative who agreed the above list weirs additional ection items. Impector reviewed the above action items with the Respondent's representative who agreed the above list weirs additional ection items. Impector reviewed the above action items with the Respondent's representative who agreed the above list weirs additional ection items. Impector of the Respondent Respondent is still by during the 2009 revalidation PAA. This is a violation of Specific Requirement to, 351 of Title V Air Permit No. 0.180-00031-V3. LAC 33:01.501.C.A, and La. R.S. 30.0057(A)(Z). The Respondent conducted a foll PHA in 2014 which clearly defined severity, illustification and risk raising chatrix, included a facility sting study and human factor analysis. The Respondent failed to consider human factors during the 2009 revalidation PHA. This is a violation of Specific Requirement No. 351 of Title V Air Permit No. 0.180-0.0031-V3. 40 CP16 68.57(E)(6), which language has been adopted as a Louislana regulation in LAC 33.II.5901. LAC 33.II.501.C.4, and La. R.S. 30.0057(A)(2). The Respondent conducted a fail PHA in 2014 which clearly defined severity, illustification, and risk raisking matrix, included a facility stiling study advisor in the commendations, assure that the recommendations are resolved in a timely minner and that the respondent failed to act of a side state in the 2009 PHA. The Respondent to be completed. This is a violation of Specific Requirement flow, 50.35 of Title V Air Permit No. 10 180-00031-V3, 40 CP16 68.57(E), which language has been adopted as a Louislana regulation in LAC 33.II.9001, LAC 33.II.901.C.A, and L.R.S. 30.0057(A)(A). 10 180-00031-V3, 40 CP16 68.57(E), which language has been adopted of when these actions are to be completed. This is a violatio		are after a contract of	The Respondent could not find any documentation that the action items had been assigned,
V.A.F. Pernth Rés. 0.1896-00031-V3. Ad CRFA 00 CFA 08.87(c)(1), which insquage has been adopted as a louisians registation in Just 331.1550(1), LVG. 3318.15.01.C.A, and La. R.S. 2002057/A()2. The Inspector reviewed the above altricol beave its view additional scloph lears. Inspection(1) The Paspondent failed to perform a siting study during the 2005 revalidation PIA. This is a contribution of Specific Requirement No. 351: of Title V Air Permit. No. 0508-00031-V3. AC 3311.5301.C.A, and La. R.S. 202057/A()2. The Respondent conducted a full PIA in 2014 which clearly defined severity. Bleethood, and risk making antity. Included and homan factor analysis. Inspection(3) The Respondent failed to consider hyman factors during the 2009 revalidation PIA. This is a violation of specific Requirement No. 351: of Title V Air Permit No. 0180-00031-V3. AC 3311.5501.C.A, and La. R.S. 30.0037/A(2). The Respondent conducted a full PIA in 2014 which clearly defined severity, Bleethood, and risk making ratios, included and human factor analysis. Inspection(1) Cochear-3-5, 2017 VII. Inspection(1) Cochear-3-5, 2017 VIII. Inspection(1) Cochear-3-5, 2			given due dates, or were addressed/completed. Further, the Respondent could not provide the
inspection(s) October 3-5, 2017 V. 201			Tisk raining matrix for the action items. This is a violation of Specific Requirement No. 351 of Title
Inspection(s) Inspection(s) Inspection(s) Inspection(s) Inspection(s) Inspection(s) The Respondent Railed to perform a string study during the 2009 revalidation PIA. This is a violation of Specific Requirement (No. 351 of Title V Air Permit No. 0180-0014) 40 CRR 8.6.7(c)(S), which briguage has been adopted as a Guidstans regulation in LAC 33.II.5901. LAC 38.II.5901.CA and La. R.S. 30:2007/A(IZ). The Respondent Gardin PIA in 2014 which clearly ineffined severity, Relibingod, and risk ranking metric, included a facility string study and human factor analysis. Inspection(s) 70 CRR 8.6.7(c)(S), which briguage has been adopted as a Guidstan regulation in LAC 33.II.5901. LAC 39.III.5901.CA, and La. R.S. 30:2007/A(IZ). The Respondent Gardin Vision of Specific Regulrement No. 351 of Title V Air Permit No. 0180-0031-V301. LAC 39.III.5901.CA, and La. R.S. 30:2007/A(IZ). The Respondent conducted a full PIA in 2014 which clearly defined severity, Illeholon, and risk raining matrix, included a facility string study and human factor analysis. Inspection(s) October 3-5, 2017 VII. Inspection(s) In			v Air Permit No. 0180-00051-V3, 40 CFR 40 CFR 68.67(c)(2), which language has been adopted as
Inspection(s) October 3-5, 2017 We have a defictional exclosi Resultaneous No. 351. of Title V AIP Permit No. 0180-00031-V3, V	14 N 4		a cousiana regulation in LAC 33.HL5901, LAC 33:HL501.C,4, and La. R.S. 30:2057(A)(2). The
Inspection(s) October 3-5, 2017 W. 2017 The Respondent Railed to perform a titing study during the 2009 revalidation PIA. This is a violation of Specific Requirement (No. 351 of Title V /AP Permit Ro. 0.158-0031). A CA 33/III.501.CA 31/II.501.CA 31/I			inspector reviewed the above action items with the Respondent's representative who agreed the
dotation of Specific Requirement No. 351 of Title V Air Permit Ro. 0.180/0031-375, 40 CFR 88.67(c)(5), which insignate has been adopted as a furbian regulation in LAC 33.11.5901. LAC 32.11.501.CA, and La. R.S. 30.2077(A)(2). The Respondent conducted a full Plat In 2014 which clearly desired severity, itselfibrod, and risk ranking matrix, included a facility stiling study and characteristic and analysis. The Respondent field to corisider human factors during the 2009 revalidation Plat. This is a constant of the complete	1	Incountion/e)	
40 CFR 88.67(q(S), which language has been adopted as a Louisiana regulation in LAC 33.III.5001. LAC 33.III.5001. CA, and LAC 33.III.5001. The Respondent conducted a full PHA in 2014 willich clearly defined severity, National, and risk ranking matrix, Included a facility stitute study and human factor analysis. Inspection(s) October 3-5, VI. 2017 VI. 2017 VI. 2017 VI. 2017 VI. 2017 VI. 2017 VII. 2016 Inspection(s) Inspection(s) Inspection(s) Inspection(s) October 3-5, 2017 VIII. 2016 Inspection(s) Inspect			Modellon of Specific Basis maner the 261 of Tale V As never to accompany
LAC 33:III.501.C.4, and La. R.S. 30:2057/A(12). The Respondent conducted a facility sting study and human factor analysis.			40 CFR 59 57/AVST which is some has been adapted as a local secretary as a page 10 and
which clearly idefined seventry, likelihood, and risk ranking matrix, included a facility siting study and human factor analysis. Inspection(s) October 3-4, 2017 AI CPR 68.67(c)(6), which language has been adopted as a Louistana regulation in LAC 33.III.5001, LAC 33.II.5001, LAC 33.	V.		LAC 33:11:501 C.4 and ta R.S. 20:2057/AV2). The Bernanderts associated a fall plac to 20:4
Inspection(s) October 3-5, 2017 VI. 2017 No. 2017 N			Which clearly defined severity likelihood, and rick ranking matrix, included a familiar string study
Mesection(s) The Respondent falled to coasister human factors during the 2009 revalidation PHA. This is a violation of Specific Requirement No. 351 of "Titler VAIr Permit No. 0.180-00031-VA, 2017 AC CPR 68.575([6]), which language has been adopted as a fousistana regulation in LAC 33.III.5901, LAC 33.III.			and human factor analysis
VII. October 3-5, Volation of Specific Requirement No. 351. of Title V Air Permit No. 0180-00031-V3. VII. Dec Re 6.87(c)(6), which language has been adopted as a Louistan regulation in LAC 33.III.5901. LAC 33.III.5901. As and I see a severity, likelihood, and risk ranking matrix, included a facility string study and human factor analysis. Inspection(4) October 3-5, 2017 VIII. December 2014 and the resolution is documented; document what actions are to be taken; 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; and develop a written schedule of when these actions are to be completed. This is a violation of Specific Requirement No. 351. of Title V Air Permit No. 0180-00031-V3 AO CRF 68.67(4), which language has been adopted as a Louislana regulation in LAC 33.III.5901,		Inspection(s)	- the control of the
VII. 40 CPR 68.67/c[6], which language has been adopted as a Louishana regulation in LAC 33.III.5901, AC 33III.501.CA, and Ita. R.S. 30.2057/A[J2]. This Respondent conducted a full lything study and human factor analysis. Inspection(s) October 3-5, 2017 VIII. Will. Manage and the second sec		October 3-5,	Violation of Specific Requirement No. 351 of Title V Air Permit No. 0180-00031-V3
LAC 33:III.501.C.4, and La. R.5. 30:2057(A)(2). The Respondent conducted a facility sting study with clearly defined severin; likelishood, and risk ranking matrix, included a facility sting study and human factor analysts. The Respondent failed to list or address the team's findings in the 2009 PHA. The Respondent footing the could not provide evidence that they established a system to promptly address the team's findings and recommendations; assure that the recommendations are resolved in a time to be completed. This is a violation of Specific Requirement No. 351 of Title V Air Permit No. 0180-00031-V3, 40 CFR 68.67(e), which inguage has been adopted as a Louisian regulation in LAC 33.III.5901, LAC 33:III.591.C.4, and La. R.5. 30:2057(A)(2). Inspection(4) October 3-5, PHA was completed in December 2014 and the action items were not assigned or given due dates until December 2015. The regulations state that, "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 document what actions are to be taken; complete actions are not assigned of when these actions are to be taken; completed" Additionally, the Respondent sopic written schedule of when these actions are to be completed" Additionally, the Respondent sopic written schedule of when these actions are to be completed" Additionally, the Respondent sopic written schedule of when these actions are to be completed. The schedule of when these actions are to be completed. Additionally, the Respondent sopic written schedule of when these actions are to be completed. The schedule of when these actions are to be completed. The schedule of when these actions are to be completed. The schedule of when these actions are to be completed. The schedule of when these actions are a schedule of when these actions are a schedule of when these actions are a schedule of when the schedule of when these actions are to be completed	1.0	2017	40 CFR 68.67(c)(6), which language has been adopted as a Louisiana regulation in LAC 33 III 5901
which clearly defined seventhy, likelihood, and risk ranking matrix, included a facility siting study and human factor analysis. Inspection(s) October 3-6, 2017 VII. The Respondent failed to list or address the team's findings in the 2009 PHA. The Respondent could not provide evidence that they established 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 a soon as possible; and develop a written schedule of when these actions are to be completed. This is a violation of Specific Requirement No. 351 of Title V Air Permit No. 0180-00031-V3, 40 CFR 86.87(e), which inspugage has been adopted as a louislana regulation in LAC 33.III.5901, LAC 33.III.5	*		LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). The Respondent conducted a full PHA in 2014
Inspection(s) October 3-5, 2017 NIL. Inspection(s) Inspection(s) Inspection(s) Inspection(s) Inspection(s)			which clearly defined severity, likelihood, and risk ranking matrix, included a facility sitting study
October 3-5. 2017 October 3-5. October 3-5. October 3-5. October 3-5. October 3-5. October 3-5. October 3-6. October 3-7. October 3-7. October 3-7. October 3-7. October 3-7. October 3-7. Inspection(s) Inspection(s) Inspection(s) October 3-7. Inspection(s) October 3-7. Octobe			and human factor analysis.
VII. October 3-5. Could not provide evidence that they established 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; and develop a written schedule of when these actions are to be completed. This is a violation of Specific Requirement No. 351 of Title V Air Permit No. 0180-00031-V3; 40 CFR 68.67(e), which language has been adopted as a Louislana regulation in LCC 33.III.5901, LAC 33.III.5901, CA, and La, R.S. 30:2057(A)(2). Inspection(s) October 3-5. 2017 Inspection(s) October 3-5. 2017 The Respondent failed to address action items in the 2014 PNA in a timely manner. The 2014 PNA was completed in December 2014 and the action items were not assigned or given due dates until December 2015. The regulations state that, "The owner or operations 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" Additionally, the Respondert's policy states that Level 2 risk ranked action items are unacceptable and should be mitigated with engineering or administrative actions to a risk level of 3 or less within 12 months. Once the four (4) Identified Level 2 action items were assigned they were given due dates out an additional 12 to 19 months, instead of addressing them immediately. Therefore, the four (4) Level 2 action items were completed 8 to 19 months present or 354 in 18 to 18 months instead of addressing them immediately. Therefore, the four (4) Level 2 action items were completed 8 to 19 months past the original 12 month time frame stated in the policy. This is a violation of Specific Requirement No. 354 of Title V Air Permit No. 0180-0			The Respondent failed to list or address the team's findings in the 2009 PHA. The Respondent
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; and develop a written schedule of when these actions are to be completed. This is a violation of Specific Requirement No. 351 of Title V Air Permit No. 0180-00031-V.4 of CR 68.7(e), which language has been adopted as a Louislana regulation in LAC 33.III.5001, LAC 33.III.5001, C.4, and La. R.S. 30:2057(A)/2). Inspection(s) Inspection(s) October 3-5; 2017 Inspection(s) PHA was completed in December 2014 and the action items were not assigned or given due dates until December 2015. The regulations state that, "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 the completed." Additionally, the promoder's policy states that Level 2 risk ranked action items are unacceptable and should be mitigated with engineering or administrative actions to a risk level of 3 or less within 12 months. Once the four (4) Identified Level 2 action frems were assigned they were given due dates an additional 21 to 19 months, instead of addressing them immediately. Therefore, the four (4) Level 2 action frems were assigned they were given due dates an additional 21 to 19 months, instead of addressing them immediately. Therefore, the four (4) Level 2 action frems were completed 8 to 19 months past the original 12 month time frame stated in the policy. This is a violation of Specific Requirement No. 354 of Title V Air Permit No. 0180-00031-V6, 40 CFR 68.67(e), which language has been adopted as a Louislana regulation in LAC 33.III.501.CA, and La. RS. 30.20257(A)(2). Inspection(s) Inspection(s) October 3-5, 2017 In preciping Circuit Spec			could not provide evidence that they established a system to promptly address the team's
complete actions as soon as possible; and develop a written schedule of when these actions are to be completed. This is a violation of Specific Requirement No. 351 of Title V Air Permit No. 0180-00031-V3, 40 CFR 68.67(e), which language has been adopted as a Louisiana regulation in LAC 33.II.5901, LAC 33:III.5901, LAC 33:III.59		2017	findings and recommendations; assure that the recommendations are resolved in a timely
complete actions as soon as possible; and develop a written schedule of when these actions are to be completed. This is a violation of Specific Requirement No. 351 of Title V Air Permit No. 0180-00031-V3, 40 CFR 68.67(e), which language has been adopted as a Louisiana regulation in LAC 33.II.5901, LAC 33.III.5901, LAC 33.II.5901, LAC 33.	VII.		manner and that the resolution is documented; document what actions are to be taken:
Olso-00031-V3, 40 CFR 68.67(e), which language has been adopted as a Louislana regulation in LAC 33.II.5901, LAC 33III.5901. CA, and La, R.S. 30:2057(A)(2). The Respondent failed to address action items in the 2014 PHA in a timely manner. The 2014 PHA was completed for December 2015. The regulations rate that, "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 takein; complete actions as soon as possible; develop a written schedule of when these actions are to be completed" Additionally, the Respondent's policy states that Level 2 risk ranked action items are unacceptable and should be mitigated with engineering or administrative actions to a risk level of 3 or less within 12 or 19 months, once the four (4) identified Level 2 action items were assigned they were given due dates out an additional 12 to 19 months, instead of addressing them immediately. Therefore, the four (4) Level 2 action items were completed 8 to 19 months past the original 12 month time frame stated in the policy. This is a violation of Specific Requirement No. 354 of Title V.Air Permit No. 0180-00031-V6, 40 CFR 88.67(e), which language has been adopted as a Louislana regulation in IAC 33.III.5901, LAC 33.III.5901. The Respondent failed to provide records of inspections and tests on process piping prior to 2011. This piping is defined as class 2; per API 570, it is to be thickness tested every ten (10) years. All piping circuits selected for inspection had current ultrasonic thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not	1		complete actions as soon as possible; and develop a written schedule of when these actions are
Inspection(s) The Respondent falled to address action items in the 2014 PHA in a timely manner. The 2014 PHA was completed in December 2015 and the action items were not assigned or given due dates until December 2015. The regulations atate that, "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 takin; complete actions as soon as possible; develop a written schedule of when these actions are to be completed" Additionally, the Respondent's policy states that Level 2 risk ranked action items are unacceptable and should be mitigated with engineering or administrative actions to a risk level of 3 or less within 12 months. Once the four (4) Identified level 2 action items were assigned they were given dues out an additional 12 to 19 months, instead of addressing them immediately. Therefore, the four (4) Level 2 action items were assigned they were given dues out an additional 12 to 19 months, instead of addressing them immediately. Therefore, the four (4) Level 2 action items were completed 3 to 19 months past the original 12 month time frame stated in the policy. This is a violation of Specific Requirement No. 324 of Title. V. Air Permit No. 0180-00031-V6, 40 CRR 68.67(e), which language has been adopted as a Louislana regulation in LAC 33.III.5901, LAC 33:III.501.C.4, and Ia. R.S. 30:2057(A)(2). Inspection(s) October 3-5, 2017 The Respondent failed to provide records of inspections and tests on process equipment. Specifically, there was no record of ultrasonic thickness (UT) testing being performed on process piping prior to 2011. This piping is defined as class 2; per API 570, it is to be thickness inspections; however, there was only one (1) round of UT inspection data available for the piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed			to be completed. This is a violation of Specific Requirement No. 351 of Title V Air Permit No.
Inspection(s) October 3-5, 2017 October 3-5, 2017 October 3-5, 2017 PHA was completed in December 2014 and the action items were not assigned or given due after suiti December 2015. The regulations state that, "The owner 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 taking complete actions as soon as soble; develop a written schedule of when these actions are to be completed" Additionally, the Respondent's policy states that Level 2 risk rainked action items are unacceptable and should be mitigated with engineering or administrative actions to a risk level of 3 or less within 12 months. Once the four (4) Identified Level 2 action items were assigned they were given due dates out an additional 12 to 19 months, instead of addressing them immediately. Therefore, the four (4) Level 2 action items were completed 8 to 19 months past the original 12 month time mestated in the policy. This is a violation of Specific Requirement No. 354 of Title V Air Permit No. 0180-00031-V6, 40 CFR 68.67(e), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.5910, LAC 33:III.5911, CA, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, 2017 In Respondent failed to provide records of inspections and tests on process equipment. Specifically, there was no record of ultrasonic thickness (UT) testing being performed on process inspections; however, there was only one (1) round of UT inspection data available for the piping circuits. The facility has been registered with the Chemical Accident Prevention Provisions (CAPP) program since 1994, and should have conducted thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015. In Inspection(s) The R			U180-00031-V3, 40 CFR 68.67(c), which language has been adopted as a Louisiana regulation in
October 3-5, 2017 PHA was completed in December 2014 and the action items were not assigned or given due dates until December 2015. The regulations ataite that, "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." Additionally, the Respondent's policy states that Level 2 risk ranked action items are unacceptable and should be mitigated with engineering or administrative actions to a risk level of 3 or less within 12 months. Once the four (4) Identified level 2 action items were assigned they were given due dates out an additional 12 to 19 months, instead of addressing them immediately. Therefore, the four (4) Level 2 action items were completed 8 to 19 months past the original 12 month time frame stated in the policy. This is a violation of Specific Requirement No. 324 of Title V. Alf Permit No. 0180-00031-V6, 40 CFR 68.67(e), which language has been adopted as a Louislana regulation in LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, 2017 Inspection(s) October 3-5, 2017 The Respondent failed to provide records of inspections and tests on process equipment. Specifically, there was no record of ultrasonic thickness (UT) testing being performed on process piping prior to 2011. This piping is defined as class 2; per API 570, it is to be thickness inspections; however, there was only one (1) round of UT inspection data available for the piping circuits. The facility has been registered with the Chemical Accident Prevention Provisions (CAPP) program since 1994, and should have conducted thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed wer	-	Inspection(s)	The December 14/14 Ac 35:111:301:C.4, and 12, K.S. 30:2057(A)(2).
dates until December 2015. The regulations state that, "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" Additionally, the Respondent's policy states that tevel 2 risk ranked action items are unacceptable and should be mitigated with engineering or administrative actions to a risk level of 3 or less within 12 months. Once the four (4) Identified Level 2 action items were assigned they were given due dates out an additional 12 to 19 months, instead of addressing them immediately. Therefore, the four (4) Level 2 action items were completed 8 to 19 months past the original 12 month time frame stated in the policy. This is a violation of Specific Requirement No. 354 of Title V. Air Permit No. 0180-00031-V6, 40 CFR 68.67(e), which language has been adopted as a cluislana regulation in LAC 33.III.5901, LAC 33:III.501.C4, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, 2017 Piping Circuits This piping is defined as class 2; per API 570, it is to be thickness tested every ten (10) years. Ail piping circuits selected for inspection had current ultrasonic thickness inspections; however, there was only one (1) round of UT inspection data available for the piping circuits. The facility has been registered with the Chemical Accident Prevention Provisions (CAPP) program since 1994, and should have conducted thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until Augus			PHA was completed to address action items in the 2014 PHA in a timely manner. The 2014
ystem 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" Additionally, the Respondent's policy states that Level 2 risk rainked action items are unacceptable and should be mitigated with engineering or administrative actions to a risk level of 3 or less within 12 months. Once the four (4) Identified Level 2 action items were assigned they were given due dates out an additional 12 to 19 months, instead of addressing them immediately. Therefore, the four (4) Level 2 action items were completed 8 to 19 months past the original 12 month time frame stated in the policy. This is a violation of Specific Requirement No. 354 of Title V Air Permit No. 0180-00031-V6, 40 CFR 68.67(e), which language has been adopted as a Louislana regulation in LAC 33.III.501.C.4, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, 2017 In Respondent failed to provide records of inspections and tests on process equipment. Specifically, there was no record of ultrasonic thickness inspections; however, there was only one (1) round of UT inspection data available for the piping circuits. The facility has been registered with the Chemical Accident Prevention Provisions (CAPP) program since 1994, and should have conducted thickness measurement Inspections in 2004. Piping Circuit 595-001-SG-01-DL was not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that the respondent could only provide records of the most current external inspections of other and inspections of T-008 and T-010 pr			dates until December 2015. The consistence state share The account of the same and the second states until December 2015.
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" Additionally, the Respondent's policy states that Level 2 risk ranked action items are unacceptable and should be mitigated with engineering or administrative actions to a risk level of 3 or less within 12 months. Once the four (4) Identified Level 2 action items were assigned they were given due dates out an additional 12 to 19 months, instead of addressing them immediately. Therefore, the four (4) Level 2 action items were completed 8 to 19 months past the original 12 month time frame stated in the policy. This is a violation of Specific Requirement No. 354 of Title V. Air Permit No. 0180-00031-V6, 40 CFR 68.67(e), which language has been adopted as a Louislanar regulation in LAC 33.III.5901, LAC 33:III.591.C.4, and La. R.5. 30:2057(A)(2). Inspection(s) October 3-5, 2017 IX. IX. IX. IX. IX. IX. IX. IX			system to promptly address the team's findings and recommendations seems that the
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" Additionally, the Respondent's policy states that Level 2 risk ranked action items are unacceptable and should be mitigated with engineering or administrative actions to a risk level of 3 or less within 12 months. Once the four (4) Identified Level 2 action items were assigned they were given due additional 12 to 19 months, instead of addressing them Immediately. Therefore, the four (4) Level 2 action items were completed 8 to 19 months past the original 12 month time frame stated in the policy. This is a violation of Specific Requirement No. 354 of Title. V. Air Permit No. 0180-00031-V6, 40 CPR 68.67(e), which language has been adopted as a Louislana regulation in LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057/Ai/(2). Inspection(s) October 3-5, 2017 Inspections; however, there was one cord of ultrasonic thickness (UT) testing being performed on process piping pripr for 2011. This piping is defined as class 2; per API 570, it is to be thickness tested every ten (10) years. All piping circuits selected for inspection had current ultrasonic thickness inspection at a available for the piping circuits. The facility has been registered with the Chemical Accident Prevention Provisions (CAPP) program since 1994, and should have conducted thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until August 2012. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 2014. Specifically, the Respondent could only provide records of the most current external inspections of 1-008 and 1-010 prior to the performed eve			recommendations are resolved in a timely manner and that the parallellon is documented
yviii. Ischedule of when these actions are to be completed" Additionally, the Respondent's policy states that Level 2 risk ranked action items are unacceptable and should be mitigated with englineering or administrative actions to a risk level of 3 or less within 12 months. Once the four (4) Identified Level 2 action items were assigned they were given due dates out an additional 12 to 19 months, instead of addressing them immediately. Therefore, the four (4) Level 2 action items were completed 8 to 19 months past the original 12 month time frame stated in the policy. This is a violation of Specific Requirement No. 354 of Title V Air Permit No. 0180-00031-V6, 40 CFR 68.67(e), which language has been adopted as a Louislana regulation in LAC 33.III.5910.1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, 2017 Inspection(s) October 3-5, 2017 IX. IX. IX. IX. IX. IX. IX. IX			document what actions are to be taken; complete actions as soon as nostible develor a written
states that Level 2 risk ranked action items are unacceptable and should be mitigated with engineering or administrative actions to a risk level of 3 or less within 12 months. Once the four (4) Identified Level 2 action items were assigned they were given due dates out an additional 12 to 19 months, instead of addressing them immediately. Therefore, the four (4) Level 2 action items were completed 8 to 19 months past the original 12 month time frame stated in the policy. This is a violation of Specific Requirement No. 354 of Title V Air Permit No. 0180-00031-V6, 40 CFR 68.67(e), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). Inspection(s) Inspection(s) October 3-5, 2017 In Respondent falled to provide records of inspections and tests on process equipment. Specifically, there was no record of ultrasonic thickness (UT) testing being performed on process piping prior to 2011. This piping is defined as class 2; per API 570, it is to be thickness tested every ten (10) years. All piping circuits selected for inspection had current ultrasonic thickness inspection had current ultrasonic thickness inspection that available for the piping circuits. The facility has been registered with the Chemical Accident Prevention Provisions (CAPP) program since 1994, and should have conducted thickness inspected until November 2015; all other piping circuits: 595-001-56-01-DL was not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits. The Respondent failed to provide re			schedule of when these actions are to be completed" Additionally, the Respondent's policy
engineering or administrative actions to a risk level of 3 or less within 12 months. Once the four (4) Identified Level 2 action items were assigned they were given due dates out an additional 12 to 19 months, instead of addressing them immediately. Therefore, the four (4) Level 2 action items were completed 8 to 19 months past the original 12 month time frame stated in the policy. This is a violation of Specific Requirement No. 354 of Title V. Air Permit No. 0180-00031-V6, 40 CFR 68.67(e), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33.III.5901, CA, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, Specifically, there was no record of ultrasonic thickness (UT) testing being performed on process piping prior to 2011. This piping is defined as class 2; per AP) 570, it is to be thickness tested every ten (10) years. All piping circuits selected for inspection data available for the piping circuits. The facility has been registered with the Chemical Accident Prevention Provisions (CAPP) program since 1994, and should have conducted thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until August 2012. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501,C/4, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, 2017 Inspection(s) October 3-6, 2017 Inspection(s) October 3-7, 2017 Inspection(s) October 3-8, 2017 Inspection(s) October 3-8, 2017 Inspection(s) October 3-8, 2017 Inspection(s) October 3-8, 2017 Inspection(s) October	VIII.		states that Level 2 risk ranked action items are unacceptable and should be mitigated with
(4) Identified Level 2 action items were assigned they were given due dates out an additional 12 to 19 months, instead of addressing them immediately. Therefore, the four (4) Level 2 action items were completed 8 to 19 months past the original 12 month time frame stated in the policy. This is a violation of Specific Requirement No. 354 of Title V Air Permit No. 0180-00031-V6, 40 CFR 68.67(e), which language has been adopted as a Louislana regulation in LAC 33.III.5901, LAC 33:III.501.CA, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, 2017 The Respondent failed to provide records of inspections and tests on process equipment. Specifically, there was no record of ultrasonic thickness (UT) testing being performed on process piping prior to 2011. This piping is defined as class 2; per API 570, it is to be thickness tested every ten (10) years. All piping circuits selected for inspection thad current ultrasonic thickness inspections; however, there was only one (1) round of UT inspection data available for the piping circuits. The facility has been registered with the Chemical Accident Prevention Provisions (CAPP) program since 1994, and should have conducted thickness measurement inspections in 2004. Piping Circuit 595-001-36-01-DL was not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2016. Inspections of 50-03 and 7-010 dated November 17, 2014. Per 4PI 510, exter			engineering or administrative actions to a risk level of 3 or less within 12 months. Once the four
to 19 months, instead of addressing them immediately. Therefore, the four (4) Level 2 action litems were completed 8 to 19 months past the original 12 month time frame stated in the policy. This is a violation of Specific Requirement No. 354 of Title V Air Permit No. 0180-00031-V6, 40 CFR 68.67(e), which language has been adopted as a Louislana regulation in LAC 33.III.5901, LAC 33:III.591.C.4, and La. R.S. 30:2057(A)[2]. Inspection(s) October 3-5, 2017 In Respondent failed to provide records of inspections and tests on process equipment. Specifically, there was no record of ultrasonic thickness (UT) testing being performed on process piping prior to 2011. This piping is defined as class 2; per API 570, it is to be thickness tested every ten (10) years. All piping circuits selected for inspection had current ultrasonic thickness inspections; however, there was only one (1) round of UT inspection data available for the piping circuits. The facility has been registered with the Chemical Accident Prevention Provisions (CAPP) program since 1994, and should have conducted thickness magneted until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness m			(4) Identified Level 2 action items were assigned they were given due dates out an additional 12
Inspection(s) October 3-5, 2017 Inspection(s)			to 19 months, instead of addressing them immediately. Therefore, the four (4) Level 2 action
AC CFR 68.67(e), which language has been adopted as a Louislana regulation in LAC 33.III.5901, LAC 33:III.501.C.A, and La. R.S. 30:2057(A)[2]. Inspection(s) October 3-5, 2017 The Respondent falled to provide records of inspections and tests on process equipment. Specifically, there was no record of ultrasonic thickness (UT) testing being performed on process piping prior to 2011. This piping is defined as class 2; per API 570, it is to be thickness tested every ten (10) years. All piping circuits selected for inspection had current ultrasonic thickness inspections; however, there was only one (1) round of UT inspection data available for the piping circuits. The facility has been registered with the Chemical Accident Prevention Provisions (CAPP) program since 1994, and should have conducted thickness measurement inspections in 2004. Piping Circuit 595-001-SG-01-DL was not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until August 2012. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.591.C.A, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, 2017 Respondent falled to perform inspections and tests of process equipment at a frequency consistent with applicable manufacturers' recommendations and good engineering practices. The Respondent falled to perform visual inspections on PSV-5314 consistent with annual frequency. PSV 5314 was not inspected in 2016; it was visually inspected in April 2017. Additionally,			items were completed 8 to 19 months past the original 12 month time frame stated in the policy.
Inspection(s) October 3-5, 2017 The Respondent falled to provide records of inspections and tests on process equipment. Specifically, there was no record of ultrasonic thickness (UT) testing being performed on process piping prior to 2011. This piping is defined as class 2; per AP) 570, it is to be thickness tested every ten (10) years. All piping circuits selected for inspection had current ultrasonic thickness inspections; however, there was only one (1) round of UT inspection data available for the piping circuits. The facility has been registered with the Chemical Accident Prevention Provisions (CAPP) program since 1994, and should have conducted thickness measurement Inspections in 2004. Piping Circuit 595-001-SG-01-DL was not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness measurement Inspections in LAC 33.III.5901. LAC 33:III.5901. Inspection(s) October 3-5, 2017 The Respondent falled to provide records of external inspections of T-008 and T-010 prior to 2014. Specifically, the Respondent could only provide records of the most current external inspections of T-008 and T-010 dated November 17, 2014. Per API 510, external inspections are to be performed every five (5) years. The facility have been registered with the CAPP program since 1994; therefore, previous external inspections should have been conducted in 1999, 2004, and 2009. This is a violation of Specific Requirement No. 265 of T			This is a violation of Specific Requirement No. 354 of Title V Air Permit No. 0180-00031-V6,
The Respondent failed to provide records of inspections and tests on process equipment. Specifically, there was no record of ultrasonic thickness (UT) testing being performed on process piping prior to 2011. This piping is defined as class 2; per API 570, it is to be thickness tested every ten (10) years. All piping circuits selected for inspection had current ultrasonic thickness inspections; however, there was only one (1) round of UT inspection data available for the piping circuits. The facility has been registered with the Chemical Accident Prevention Provisions (CAPP) program since 1994, and should have conducted thickness measurement inspections in 2004. Piping Circuit 595-001-SG-01-DL was not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until August 2012. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.591, the Respondent failed to provide records of external inspections of T-008 and T-010 prior to 2014. Specifically, the Respondent could only provide records of the most current external inspections of T-008 and T-010 dated November 17, 2014. Per API 510, external inspections are to be performed every five (5) years. The facility has been registered with the CAPP program since 1994; therefore, previous external inspections should have been conducted in 1999, 2004, and 2009. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, 2017 The Respondent failed to perform visual inspections and good engineering practices. The Respondent failed to perform visual inspections on PSV-5314 consistent with annual frequency. PSV 5314 was not inspected in 2016; it was visually inspected i			40 CPR 68.07(e), which language has been adopted as a Louisiana regulation in LAC 33.11.5901,
Specifically, there was no record of ultrasonic thickness (UT) testing being performed on process piping prior to 2011. This piping is defined as class 2; per API 570, it is to be thickness tested every ten (10) years. All piping circuits selected for inspection add current ultrasonic thickness inspections; however, there was only one (1) round of UT inspection data available for the piping circuits. The facility has been registered with the Chemical Accident Prevention Provisions (CAPP) program since 1994, and should have conducted thickness measurement inspections in 2004. Piping Circuit 595-001-SG-01-DL was not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until August 2012. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68-73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501,CA, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, 2014. Specifically, the Respondent could only provide records of the most current external inspections of T-008 and T-010 prior to 2014. Specifically, the Respondent could only provide records of the most current external inspections of T-008 and T-010 dated November 17, 2014. Per API 510, external inspections are to be performed every five (5) years. The facility has been registered with the CAPP program since 1994; therefore, previous external inspections should have been conducted in 1999, 2004, and 2009. This is a violation of Specific Requirement No. 255 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68-73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.CA, and La. R.S. 30:2057(A)(2). The Respondent failed to perform visual inspections and tests of process equipment at a frequency consistent with applicable manufacturers' recommendations and good engineering practices. The Respondent failed to perform visual inspections on PSV-5314 consistent with an	-	(nenection/s)	The Data-data (alica t
piping prior to 2011. This piping is defined as class 2; per APi 570, it is to be thickness tested every ten (10) years. All piping circuits selected for inspection had current ultrasonic thickness inspections; however, there was only one (1) round of UT inspection data available for the piping circuits. The facility has been registered with the Chemical Accident Prevention Provisions (CAPP) program since 1994, and should have conducted thickness measurement inspections in 2004. Piping Circuit 595-001-SG-01-DL was not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until August 2012. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5901, LAC 33:III.591.C.A, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, 2017 Inspections of T-008 and T-010 dated November 17, 2014. Per API 510, external inspections are to be performed every five (5) years. The facility has been registered with the CAPP program since 1994; therefore, previous external inspections should have been conducted in 1999, 2004, and 2009. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.5901, LAC 33:III.5901, EAC 33:III.5901, LAC 33:III.5901, TAC 33:III.5901, TA			Specifically, there was no record of ultransials shiptons and tests on process equipment.
ix. Every ten (10) years. All piping circuits selected for inspection had current ultrasonic thickness inspections; however, there was only one (1) round of UT inspection data available for the piping circuits. The facility has been registered with the Chemical Accident Prevention Provisions (CAPP) program since 1994, and should have conducted thickness measurement Inspections in 2004. Piping Circuit 595-001-SG-01-DL was not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until November 2012. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.591. The Respondent failed to provide records of external inspections of T-008 and T-010 prior to 2014. Specifically, the Respondent could only provide records of the most current external inspections of T-008 and T-010 dated November 17, 2014. Per API 510, external inspections are to be performed every five (5) years. The facility has been registered with the CAPP program since 1994; therefore, previous external inspections should have been conducted in 1999, 2004, and 2009. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). Inspection(s)			pioing prior to 2011. This pioing is defined as class 2: nor ADI 570. Is to be ablationed because
Inspections; however, there was only one (1) round of UT inspection data available for the piping circuits. The facility has been registered with the Chemical Accident Prevention Provisions (CAPP) program since 1994, and should have conducted thickness measurement inspections in 2004. Piping Circuit 595-001-SG-01-DL was not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until August 2012. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68-73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, 2017 Xi. The Respondent failed to provide records of external inspections of T-008 and T-010 prior to 2014. Specifically, the Respondent could only provide records of the most current external inspections of T-008 and T-010 dated November 17, 2014. Per API 510, external inspections are to be performed every five (5) years. The facility has been registered with the CAPP program since 1994; therefore, previous external inspections should have been conducted in 1999, 2004, and 2009. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68-73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.5901, CA, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, 2017 Inspection(s) The Respondent failed to perform inspections and tests of process equipment at a frequency consistent with applicable manufacturers' recommendations and good engineering practices. The Respondent failed to perform visual inspections on PSV-5314 consistent with annual frequency. PSV 5314 was not inspected in 2016; it was visually inspected in April 2017. Additionally,	1		every ten (10) years. All piping circuits selected for inchestion had current ultraconta thickness
circuits. The facility has been registered with the Chemical Accident Prevention Provisions (CAPP) program since 1994, and should have conducted thickness measurement inspections in 2004. Piping Circuit 595-001-SG-01-DL was not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until August 2012. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68-73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.CA, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, 2017 X. The Respondent failed to provide records of external inspections of T-008 and T-010 prior to 2014. Specifically, the Respondent could only provide records of the most current external inspections of T-008 and T-010 dated November 17, 2014. Per API 510, external inspections are to be performed every five (5) years. The facility has been registered with the CAPP program since 1994; therefore, previous external inspections should have been conducted in 1999, 2004, and 2009. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68-73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.CA, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, 2017 The Respondent failed to perform inspections and tests of process equipment at a frequency consistent with applicable manufacturers' recommendations and good engineering practices. The Respondent failed to perform visual inspections on PSV-5314 consistent with annual frequency. PSV 5314 was not inspected in 2016; it was visually inspected in April 2017. Additionally,	1 2 2		Inspections; however, there was only one (1) round of UT inspection data available for the plains
program since 1994, and should have conducted thickness measurement inspections in 2004. Piping Circuit 595-001-SG-01-DL was not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until August 2012. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68:73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.591, LAC 33:III.591, LAC 33:III.591, LAC 33:III.591, the Respondent could only provide records of the most current external inspections of T-008 and T-010 dated November 17, 2014. Per API 510, external inspections are to be performed every five (5) years. The facility has been registered with the CAPP program since 1994; therefore, previous external inspections should have been conducted in 1999, 2004, and 2009. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68:73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.C4, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, October 3-5, 2017 No. 2017 The Respondent falled to perform inspections and tests of process equipment at a frequency consistent with applicable manufacturers' recommendations and good engineering practices. The Respondent falled to perform visual inspections on PSV-5314 consistent with annual frequency. PSV 5314 was not inspected in 2016; it was visually inspected in April 2017. Additionally,	iv		circuits. The facility has been registered with the Chemical Accident Prevention Provisions (CAPP)
Piping Circuit 595-001-SG-01-DL was not thickness inspected until November 2015; all other piping circuits that were reviewed were not thickness inspected until August 2012. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501,CA, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, 2017 Xi. Xi. Dispections of T-008 and T-010 dated November 17, 2014. Per API 510, external inspections are to be performed every five (5) years. The facility has been registered with the CAPP program since 1994; therefore, previous external inspections should have been conducted in 1999, 2004, and 2009. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). The Respondent falled to perform inspections and tests of process equipment at a frequency consistent with applicable manufacturers' recommendations and good engineering practices. The Respondent falled to perform visual inspections on PSV-5314 consistent with annual frequency. PSV 5314 was not inspected in 2016; it was visually inspected in April 2017. Additionally,			program since 1994, and should have conducted thickness measurement inspections in 2004.
piping circuits that were reviewed were not thickness inspected until August 2012. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501,CA, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, 2017 X. The Respondent falled to provide records of external inspections of T-008 and T-010 prior to 2014. Specifically, the Respondent could only provide records of the most current external inspections of T-008 and T-010 dated November 17, 2014. Per API 510, external inspections are to be performed every five (5) years. The facility has been registered with the CAPP program since 1994; therefore, previous external inspections should have been conducted in 1999, 2004, and 2009. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). The Respondent falled to perform inspections and tests of process equipment at a frequency consistent with applicable manufacturers' recommendations and good engineering practices. The Respondent falled to perform visual inspections on PSV-5314 consistent with annual frequency. PSV 5314 was not inspected in 2016; it was visually inspected in April 2017. Additionally,	1		Piping Circuit 595-001-SG-01-DL was not thickness inspected until November 2015; all other
violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501,CA, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, 2017 X. X. X. X. Inspections of T-008 and T-010 dated November 17, 2014. Per API 510, external inspections are to be performed every five (5) years. The facility has been registered with the CAPP program since 1994; therefore, previous external inspections should have been conducted in 1999, 2004, and 2009. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, 2017 The Respondent falled to perform inspections and tests of process equipment at a frequency consistent with applicable manufacturers' recommendations and good engineering practices. The Respondent falled to perform visual inspections on PSV-5314 consistent with annual frequency. PSV 5314 was not inspected in 2016; it was visually inspected in April 2017. Additionally,			piping circuits that were reviewed were not thickness inspected until August 2012. This is a
LAC 33:III.501,C.4, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, 2017 The Respondent falled to provide records of external inspections of T-008 and T-010 prior to 2014. Specifically, the Respondent could only provide records of the most current external inspections of T-008 and T-010 dated November 17, 2014. Per API 510, external inspections are to be performed every five (5) years. The facility has been registered with the CAPP program since 1994; therefore, previous external inspections should have been conducted in 1999, 2004, and 2009. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, XI, 2017 The Respondent falled to perform inspections and tests of process equipment at a frequency consistent with applicable manufacturers' recommendations and good engineering practices. The Respondent falled to perform visual inspections on PSV-5314 consistent with annual frequency. PSV 5314 was not inspected in 2016; it was visually inspected in April 2017. Additionally,			violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8.
Inspection(s) October 3-5, 2017 The Respondent falled to provide records of external inspections of T-008 and T-010 prior to 2014. Specifically, the Respondent could only provide records of the most current external inspections of T-008 and T-010 dated November 17, 2014. Per API 510, external inspections are to be performed every five (5) years. The facility has been registered with the CAPP program since 1994; therefore, previous external inspections should have been conducted in 1999, 2004, and 2009. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). The Respondent falled to perform inspections and tests of process equipment at a frequency consistent with applicable manufacturers' recommendations and good engineering practices. The Respondent falled to perform visual inspections on PSV-5314 consistent with annual frequency. PSV 5314 was not inspected in 2016; it was visually inspected in April 2017. Additionally,			40 CFR 68:73(d)(1), Which language has been adopted as a Louisiana regulation in LAC 33.III.5901,
October 3-5, 2014. Specifically, the Respondent could only provide records of the most current external inspections of T-008 and T-010 dated November 17, 2014. Per API 510, external inspections are to be performed every five (5) years. The facility has been registered with the CAPP program since 1994; therefore, previous external inspections should have been conducted in 1999, 2004, and 2009. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, Cotober 3-5, Cotob	-	Internation of the	LAU 55:III.5U1,UA, and La. R.S. 30:2057(A)(2).
inspections of T-008 and T-010 dated November 17, 2014. Per API 510, external inspections are to be performed every five (5) years. The facility has been registered with the CAPP program since 1994; therefore, previous external inspections should have been conducted in 1999, 2004, and 2009. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, Consistent with applicable manufacturers' recommendations and good engineering practices. The Respondent falled to perform visual inspections on PSV-5314 consistent with annual frequency. PSV 5314 was not inspected in 2016; it was visually inspected in April 2017. Additionally,		4.5.000	ine respondent tailed to provide records of external inspections of T-008 and T-010 prior to
to be performed every five (5) years. The facility has been registered with the CAPP program since 1994; therefore, previous external inspections should have been conducted in 1999, 2004, and 2009. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, XI, 2017 The Respondent failed to perform inspections and tests of process equipment at a frequency consistent with applicable manufacturers' recommendations and good engineering practices. The Respondent failed to perform visual inspections on PSV-5314 consistent with annual frequency. PSV 5314 was not inspected in 2016; it was visually inspected in April 2017. Additionally,			licenetions of TONs and TOO detail to a second of the most current external
since 1994; therefore, previous external inspections should have been conducted in 1999, 2004, and 2009. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, Consistent with applicable manufacturers' recommendations and good engineering practices. The Respondent falled to perform visual inspections on PSV-5314 consistent with annual frequency. PSV 5314 was not inspected in 2016; it was visually inspected in April 2017. Additionally,		*	to be nectormed about five (\$1) years. The facility has been restricted at the facility of the facility has been restricted at the facility of the facility has been restricted at the facility of the facility has been restricted at the facility of the
and 2009. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, Consistent with applicable manufacturers' recommendations and good engineering practices. The Respondent falled to perform visual inspections on PSV-5314 consistent with annual frequency. PSV 5314 was not inspected in 2016; it was visually inspected in April 2017. Additionally,	χ,		since 1994; therefore, provings systemal inspections should have been accommand to some
0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, XI, 2017 Respondent falled to perform inspections and tests of process equipment at a frequency consistent with applicable manufacturers' recommendations and good engineering practices. The Respondent falled to perform visual inspections on PSV-5314 consistent with annual frequency. PSV 5314 was not inspected in 2016; it was visually inspected in April 2017. Additionally,			and 2009. This is a violation of Specific Regularement No. 265 of Tible V Air December Man
In LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2). Inspection(s) October 3-5, XI, 2017 Respondent falled to perform inspections and tests of process equipment at a frequency consistent with applicable manufacturers' recommendations and good engineering practices. The Respondent falled to perform visual inspections on PSV-5314 consistent with annual frequency. PSV 5314 was not inspected in 2016; it was visually inspected in April 2017. Additionally,	1		0180-00031-V8, 40 CFR 68.73(d)(1), which language has been adonted as a fouldiana condition
Inspection(s) October 3-5, XI, The Respondent falled to perform inspections and tests of process equipment at a frequency consistent with applicable manufacturers' recommendations and good engineering practices. The Respondent falled to perform visual inspections on PSV-5314 consistent with annual frequency. PSV 5314 was not inspected in 2016; it was visually inspected in April 2017. Additionally,			In LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
Consistent with applicable manufacturers' recommendations and good engineering practices. The Respondent falled to perform visual inspections on PSV-5314 consistent with annual frequency. PSV 5314 was not inspected in 2016; it was visually inspected in April 2017. Additionally,		inspection(s)	The Respondent falled to perform inspections and tests of process equipment at a frequency
Respondent falled to perform visual inspections on PSV-5314 consistent with annual frequency, PSV 5314 was not inspected in 2016; it was visually inspected in April 2017. Additionally,			consistent with applicable manufacturers' recommendations and good engineering practices. The
PSV 5314 was not inspected in 2016; it was visually inspected in April 2017. Additionally,	XI.	2017	Respondent falled to perform visual inspections on PSV-5314 consistent with annual frequency.
preventative maintenance for the rod packing and bore clearance measurements were	1		PSV 5314 was not inspected in 2016; it was visually inspected in April 2017. Additionally,
The state of the s	L		preventative maintenance for the rod packing and bore clearance measurements were

		performed annually as found in the standard maintenance procedure, SMP-080, rather that quarterly as found in SMP-086, which is specific to equipment in a hydrogen and carbo monoxide (HYCO) facility. This is a violation of Specific Requirement No. 265 of Title V Air Permi No. 0180-00031-V8, 40 CFR 68.73(d)(3), which language has been adopted as a Louisian regulation in LAC 33.11.5901, LAC 33:111.501.C.4, and ta. R.S. 30:2057(A)(2).
vii	inspection(s) October 3-5, 2017	The Respondent failed to ensure appropriate checks and inspections were performed to assure that equipment is installed properly and consistent with design specifications and the manufacturer's instructions. Specifically, piping in carbon monoxide service was not consistent with the facility's piping specification (HSG150L1). The use of threaded piping was identified a
XII.		the root cause in a 2,800 pound liquid methane release on December 8, 2013. This type of pipin was specifically excluded per note 20 of HSF150L1, Piping Design and Material Specification for Praxair HYCO Plants. This is a violation of Specific Requirement No. 265 of Title V Air Permit No. 0180-00031-V8, 40 CFR 68.73(f)(2), which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
	Inspection(s) October 3-5, 2017	The Respondent failed to establish a system to promotly address and resolve incident repoint findings and recommendations. Specifically, the incident investigation for the December 8, 201 incident resulted in twenty-five (25) recommendations of which twenty-four (24)
XIII.		recommendations were implemented. The recommendation that was not completed was to ad a step to clean and inspect the inlet strainers to LCH ₄ (liquid methane) pumps. This is a violatio of Specific Requirement No. 354 of Title V Air Permit No. 0180-00031-V6, 40 CFR 68.81(e), whic language has been adopted as a Louislana regulation in LAC 33.iii.5901, LAC 33:iii.501.C.4, an La. R.S. 30:2057(A)(2).
	Inspection(s) October 3-5, 2017	The Respondent falled to submit the information provided in 40 CFR 68.42(b) on each accider covered by 40 CFR 68.42(a) in the Risk Management Plan (RMP). Specifically, the RMP was no properly updated with the information from the December 8, 2013, incident. Because onsit property damage was significant, the incident meets the criteria in in 40 CFR 68.42(a), and should be contacted in the contac
XIV.		have been included in the 5-year accident history of the RMP within six (6) months per 40 CFR 68.195(a). This is a violation of Specific Requirement No. 354 of Title V Air Permit No. 0180-00031-V6, 40 CFR 68.168, which language has been adopted as a Louisiana regulation in LAC 33.III.5901, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
		ORDER
Based or	the foregoing, the	Respondent is hereby ordered to comply with the requirements that are indicated below:
,	To take, immediat with the Act, Cher correcting all of the	ely upon receipt of this COMPLIANCE ORDER, any and all steps necessary to meet and maintain complianc mical Accident Prevention Provisions, and Air Quality Regulations. This shall include, but not be limited to e violations described in the "Findings of Fact" portion.
II. Dir.	To submit to the i demonstrates that	Enforcement Division, within thirty (30) days after receipt of this COMPLIANCE ORDER, documentation the tan accurate relief system design basis for each PSV, as described in Findings of Fact Paragraph II, is available Enforcement Division, within thirty (30) days after receipt of this COMPLIANCE ORDER, documentation that the control room is explosion proof and ventilation systems meet NEC requirements for Class 1, Group I in Findings of Fact Paragraph III.
IV.	To submit to the I	Enforcement Division, Within thirty (30) days after receipt of this COMPLIANCE ORDER, documentation the UT testing has been performed on process piping, as described in Findings of Fact Paragraph IX.
٧.	To submit to the I demonstrates that addressed/comple	Enforcement Division, within thirty (30) days after receipt of this COMPLIANCE ORDER, documentation that the action items from the 2009 revalidation PHA have been assigned, given due dates, or were ted, as described in Findings of Fact Paragraph IV.
VI.	To submit to the I demonstrates that quarterly, as descr	Enforcement Division, within thirty (30) days after receipt of this COMPLIANCE ORDER, documentation that t preventative maintenance for the rod packing and bore clearance measurements has been conducted ibed in Findings of Fact Paragraph XI.
VII.	To submit to the I demonstrates that Findings of Fact Pa	Enforcement Division, within thirty (30) days after receipt of this COMPLIANCE ORDER, documentation that the Piping Design and Material Specifications are consistent with the facility's specifications, as described in prograph XII.
VIII.	To submit to the I demonstrates that of Fact Paragraph	Enforcement Division, within thirty (30) days after receipt of this COMPLIANCE ORDER, documentation that all recommendations from the December 8, 2013, incident have been implemented, as described in Finding XIII.
VIV.	demonstrates that the Risk Managem	Enforcement Division, within thirty (30) days after receipt of this COMPLIANCE ORDER, documentation that information provided in 40 CFR 68.42(b) on each accident covered by 40 CFR 68.42(a) has been submitted in ent Plan, as described in Findings of Fact Paragraph XIV.
w.	achieve compliand required to be sub	inforcement Division, within thirty (30) days after receipt of this COMPLIANCE ORDER, a written report that description of the circumstances surrounding the cited violation(s) and actions taken or to be taken to with the "Order" portion of this COMPLIANCE ORDER. This report and all other reports or information witted to the Enforcement Division by this COMPLIANCE ORDER shall be submitted to the Department at the notion of this document.
	Tananasa abcomes .	

11.	and shall briefly describe the basis for the reque	dfy the provisions of the COMPLIANCE ORDER on which the hearing is requested st. This request should reference the Enforcement Tracking Number and Agency right-hand corner of the first page of this document and should be directed to
II.	this COMPLIANCE ORDER may be scheduled by a Administrative Procedure Act (La. R.S. 49:950,	r a hearing, a hearing on the disputed issue of material fact or of law regarding the Secretary of the Department. The hearing shall be governed by the Act, the et seq.), and the Division of Administrative Law (DAL) Procedural Rules. The MPLIANCE ORDER prior to the hearing, after providing sufficient notice and an the hearing.
IV.	This COMPLIANCE ORDER shall become a final er	aforcement action unless the request for hearing is timely filed. Failure to timely spondent's right to a hearing on a disputed issue of material fact or of law under
V.	COMPLIANCE ORDER shall not preclude the Res	to file an appeal or the Respondent's withdrawal of a request for hearing on this pondent from contesting the findings of facts in any subsequent penalty action espondent is estopped from objecting to this COMPLIANCE ORDER becoming a
VI.	Civil penalties of not more than thirty-two thouse Respondent's fallure or refusal to comply with the possible enforcement procedures under La. R.S.	and five hundred dollars (\$32,500) may be assessed for each day of violation. The is COMPLIANCE ORDER and the provisions herein will subject the Respondent to 30:2025, which could result in the assessment of a civil penalty in an amount of
VII.	For each violation described herein, the Departm nothing herein shall be construed to preclude the	reach day of continued violation or noncompliance. Tent reserves the right to seek civil penalties in any manner allowed by law, and right to seek such penalties.
1.	NOTIC	E OF POTENTIAL PENALTY
I.	violation(s) described herein. Written comment	y notified that the issuance of a penalty assessment is being considered for the s may be filed regarding the violation(s) and the contemplated penalty. If you be submitted within ten (10) days of receipt of this notice.
B.	Prior to the Issuance of additional appropriate en	forcement action(s), you may request a meeting with the Department to presentation(s). If you would like to have such a meeting, please contact Christopher
	forward the Respondent's most current annual noncompliance for the cited violations to the all POTENTIAL PENALTY. Include with your statement assert that no monetary benefits have been gain submit the requested most current annual gross.	e whether a penalty will be assessed and the amount of such penalty. Please gross revenue statement along with a statement of the monetary benefits of bove named contact person within ten (10) days of receipt of this NOTICE Or ent of monetary benefits the method(s) you utilized to arrive at the sum. If you ined, you are to fully justify this statement. If the Respondent chooses not to revenues statement within ten (10) days, it will be viewed by the Department as to pay the statutory maximum penalty as outlined in La. R.S. 30:2025.
IV.	The Department assesses civil penalties based or PENALTY portion, the Respondent may offer a described herein. The Respondent may offer a settlement negotiations. The decision to proceed amount may be entered on the attached "CONSC TO CLOSE" form. The Respondent must include a	LAC 33::Subpart1.Chapter7. To expedite closure of this NOTICE OF POTENTIAL settlement amount to resolve any claim for civil penalties for the violation(s) settlement amount, but the Department is under no obligation to enter into i with a settlement is at the discretion of the Department. The settlement offer DLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY REQUEST Justification of the offer. DO NOT submit payment of the offer amount with the offer and notify the Respondent as to whether the offer is or is not accepted.
v.		FICE OF POTENTIAL PENALTY is effective upon receipt.
		D SUBMITTAL OF INFORMATION
	ement Division: and Department of Environmental Quality	Hearing Requests:
Office	of Environmental Compliance	Department of Environmental Quality Office of the Secretary
Air En	forcement Division	Post Office Box 4302
	Vilice Box 4312 Rouge, LA 70821	Baton Rouge, Louisiana 70821-4302
	Christopher Clement	Attn: Hearings Clerk, Legal Division Re: Enforcement Tracking No. AE-CN-18-00478 Agency Interest No. 2218
	Division (if necessary):	Physical Address (if hand delivered):
	rtment of Environmental Quality of Environmental Services	Department of Environmental Quality
Post (Office Box 4313	602 N Fifth Street
	Rouge, LA 70821-4313 Air Permits Division	Baton Rouge, LA 70802
		•

- To appeal the COMPLIANCE ORDER portion, the Respondent must follow the guidelines set forth in the "Right to Appeal" portion of this COMPLIANCE ORDER.
- To request closure of this CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY, the Respondent must demonstrate compliance with the "Order" portion of this COMPLIANCE ORDER by completing the attached "CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL REQUEST TO CLOSE" form and returning it to the address specified.
- To expedite closure of the NOTICE OF POTENTIAL PENALTY portion, the Respondent may offer a settlement amount to resolve
 any claim for civil penalties for the violation(s) described herein.
- The Department assesses civil penalties based on LAC 33:t.Subpart1.Chapter7.
- The Respondent may offer a settlement amount but the Department is under no obligation to enter into settlement negotiations. It is decided upon on a discretionary basis.
- The settlement offer amount may be entered on the attached "NOTICE OF POTENTIAL PENALTY REQUEST TO SETTLE" form. The Respondent must include a justification of the offer.
- DO NOT submit payment of the offer amount with the form. The Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.

If you have questions or need more information, you may contact Christopher Clement at (225) 219-3748 or Christopher.Clement@la.gov.

Lourdes Iturralde
Assistant Secretary

Office of Environmental Compliance

: Praxalr, Inc. c/o Craig Robnik P.O. Box 230 Geismar, LA, 70734

Attachment(s)
- Request to Close

LDEO-EDMS Documental 1937212. Page 6 of 7

ENFORCEMENT DIVISION

CONSOLIDATED COMPLIANCE ORDER &

NOTICE OF POTENTIAL PENALTY

POST OFFICE BOX A312

nforcement Tracking No.	AE-CN-18-0047	0	Contact Name	Christopher Cleme	116
gency interest (Al) No.	2218		Contact Phone No.	[225] 219-3748	
Iternate ID No.	0180-00031				
espondent:	PRAXAIR, INC.		Facility Name:	Geismar Plant	
		ce Hall Corporation	Physical Location:	9154 Louisiana Hig	hway 75
	Agent for Servi				
	SO1 Louisiana		City, State, Zip:	Geismar, LA 70734	
·	Baton Rouge, I	A 70802	Parish:	Ascension	
		STATEMENT O	F COMPLIANCE		
	STATEMENT O			Date Completed	Copy Attached?
written report was subm ne COMPLIANCE ORDER. Il necessary documents w	ere submitted to th	e Department within	30 days of receipt of the		
OMPLIANCE ORDER In acc					
III necessary documents w COMPLIANCE ORDER in a COMPLIANCE ORDER.				N/A	N/A
OMPLIANCE ORDER. If necessary documents w. COMPLIANCE ORDER in acc. COMPLIANCE ORDER.				N/A	N/A
III items in the "Findings o			were addressed and of the "Order" portion		
		was achieved as of:	FFER (OPTIONAL)		
of the COMPLIANCE ORDER	. Final compliance v	was achieved as of: SETTLEMENT O (check the op	oplicable option)	Department with the	understanding that th
of the COMPLIANCE ORDER	s not interested in	SETTLEMENT O (check the ap		Department with the (7).	understanding that th
The Respondent Department has to prevent of the control of the con	s not interested in the right to assess ci any claim for civil 18-00478), the Res	SETTLEMENT Of check the open entering into settlement of penalties based on penalties for the violations.	ent negotiations with the LAC 33:1.Subpart1.Chapte of the control	000 OMPLIANCE ORDER &	NOTICE OF POTENTIA
The Respondent Department has to PENALTY (AE-CN would like to set of the property of the present that the property of the present that the present the prese	s not interested in he right to assess ci a any claim for civil 18-00478), the Res up a meeting to disc e any claim for civil 18-00478), the Res	SETTLEMENT O (check the ap entering into settleme vil penalties based on penalties for the violation settlement process penalties for the violation spondent is interested.	ent negotiations with the LAC 33:1.Subpart1.Chapte of the control	OMPLIANCE ORDER & nent negotiations with OMPLIANCE ORDER & nent negotiations with negotiations with the negotiation with th	NOTICE OF POTENTIA the Department an NOTICE OF POTENTIA the Department an
The Respondent Department has to Department of Departm	s not interested in the right to assess class any claim for civil 18-00478), the Response of the component at the component a	entering into settlement of check the appendities for the violation penalties for the	ent negotiations with the LAC 33:1.Subpart1.Chapte attons in CONSOLIDATED Cod in entering into settlen dures. Stions in CONSOLIDATED Cod in entering into settlen clude LDEQ enforcement specially \$ Spotional) \$ Spotional \$	OMPLIANCE ORDER & nent regotiations with OMPLIANCE ORDER & nent regotiations with a costs and any monwill review the settlem	NOTICE OF POTENTIA the Department an NOTICE OF POTENTIA nothe Department an letary benefit of nor letary benefit of nor
The Respondent Department has to Department of Departm	s not interested in the right to assess of any claim for civil 18-00478), the Response of the arry claim for civil 18-00478), the Response of the right of the response of the	entering into settlement of check the appendities for the violations settlement process settlement is interested which shall in sect (BEP) component (contract the offer is or is not accided the offer is or is not accided the settlement of the offer is or is not accided the settlement of the offer is or is not accided the settlement of the offer is or is not accided the settlement of the set	ent negotiations with the LAC 33:1.Subpart1.Chapte stions in CONSOLIDATED Cd in entering into settlen dures. Itions in CONSOLIDATED Cd in entering into settlen clude LDEQ enforcement specially settlen clude LDEQ enforcement specially settlen settlen settlen clude LDEQ enforcement specially settlen settlen settlen clude LDEQ enforcement settlen set	OMPLIANCE ORDER & nent negotiations with COMPLIANCE ORDER & nent negotiations with a costs and any months will review the settlem.	NOTICE OF POTENTIAN the Department and the Department and the Department and the Department and the Department of normal benefit of normal benefit of normal period of the Department of the Dep
The Respondent Department has to Department of Departm	s not interested in the right to assess of any claim for civil 18-00478), the Response of the arry claim for civil 18-00478), the Response of the right of the response of the	entering into settlement of check the appending into settlement of penalties for the violations settlement is interested which shall in the offer is or is not according to the offer is not according	ent negotiations with the LAC 33:1.Subpart1.Chapte atlons in CONSOLIDATED Code in entering into settlen dures. Intions in CONSOLIDATED Code in entering into settlen clude LDEQ enforcement to the code in entering into settlen clude LDEQ enforcement in the code in entering into settlen clude LDEQ enforcement in the code in the co	OMPLIANCE ORDER & nent negotiations with COMPLIANCE ORDER & nent negotiations with a costs and any months will review the settlem.	NOTICE OF POTENTIAN the Department and the Department and the Department and the Department and the Department of notice of the Department of notify the Department of the Dep
The Respondent Department has to Department of Departm	s not interested in he right to assess cius any daim for civil 18-00478), the Resup a meeting to disce any claim for civil 18-00478), the Resup a meeting to disce any claim for civil 18-00478), the Resup a meeting to disce any claim for civil 18-00478), the Resup a meeting to whether that to whether that reviewed the resup and has attached in Louisiana and Uneconable inquiry, also certify that I do	entering into settlement of check the appending into settlement of penalties for the violation of the offer is or is not according to the violation of its off the statements and it not owe outstanding into the owe outstanding into owe outstanding into the statements and it not owe outstanding its statements and it not owe outstanding its statements and its statements	ent negotiations with the LAC 33:1.Subpart1.Chapte LAC 33:1.Subpart1.Chapte in the entering into settlen dures. Intions in CONSOLIDATED Code in entering into settlen clude LDEQ enforcement in the entering into settlen in the entering into settlen in the entering in the	OMPLIANCE ORDER & nent negotiations with COMPLIANCE ORDER & nent negotiations with a costs and any monwill review the settlem will review the settlem by BEPs if included in second in the compliance state portment for this facility.	NOTICE OF POTENTIAN the Department and the Department and the Department and the Department and the Department of normalization of the Potential Penaltitlement offer.
The Respondent Department has to Department of Departm	s not interested in he right to assess cius any daim for civil 18-00478), the Resup a meeting to disce any claim for civil 18-00478), the Resup a meeting to disce any claim for civil 18-00478), the Resup a meeting to disce any claim for civil 18-00478), the Resup a meeting to whether that to whether that reviewed the resup and has attached in Louisiana and Uneconable inquiry, also certify that I do	entering into settlement of check the appending into settlement of penalties for the violation of the offer is or is not according to the violation of its off the statements and it not owe outstanding into the owe outstanding into owe outstanding into the statements and it not owe outstanding its statements and it not owe outstanding its statements and its statements	ent negotiations with the LAC 33:1.Subpart1.Chapte LAC 33:1.Subpart1.Chapte in the entering into settlen dures. Intions in CONSOLIDATED Code in entering into settlen clude LDEQ enforcement in the entering into settlen in the entering into settlen in the entering in the	OMPLIANCE ORDER & nent negotiations with COMPLIANCE ORDER & nent negotiations with a costs and any monwill review the settlem will review the settlem by BEPs if included in second in the compliance state portment for this facility.	NOTICE OF POTENTIA the Department and NOTICE OF POTENTIA the Department and the Department and the Department of nor ent offer and notify the POTENTIAL PENALT ttlement offer.

MAIL COMPLETED DOCUMENT TO THE ADDRESS BELOW:

Date

Respondent's Phone #

Respondent's Physical Address

LDKOADMS Document 1937212, Page

Copartment of Environmental Call Environmental Compliance

Etterpomeri, Division
P D: Becks 12
Beton | Zue LA Fuez 1
Attn: Christopher Clement

CO FORM 2