

United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report

Ideal Chemical & Supply Co.

Memphis, Tennessee

August 18, 2021

1.0 Introduction

The U.S. Environmental Protection Agency's efforts to reduce the likelihood and severity of chemical accidents includes planning and legislative initiatives such as the National Contingency Plan, the Emergency Planning and Community Right-to-Know Act (EPCRA), and the Accidental Release Prevention requirements under Section 112(r) of the Clean Air Act (CAA), as amended in 1990. This report outlines an inspection of the Risk Management Program (RMP) as mandated by Section 112(r)(7) of the CAA.

The focus of this inspection was to assess the RMP for the chemical storage and distribution process at the Ideal Chemical & Supply Co. facility located in Memphis, Shelby County, Tennessee. This facility was selected for inspection because it hasn't been inspected within the last five years under the RMP. The inspection, which was conducted on August 18, 2021, consisted of an examination of program documentation as well as site reviews of various aspects of facility operations. Personnel from the facility participated throughout the inspection. Numerous documents were provided for review off-site. This report will provide a background of the facility and a listing of observations.

2.0 Background

The Ideal Chemical & Supply Co. facility is located in Memphis, Tennessee. The facility stores and distributes chemicals including aqueous ammonia (conc 20% or greater). The process is regulated as program level 2. According to facility records, the facility has a maximum of 56,800 pounds of aqueous ammonia (conc 20% or greater) on site. The chemical storage and distribution process at the facility is subject to the RMP requirements of 40 C.F.R. Part 68 and EPCRA Section 302. The background specifics are summarized as follows in Table 1.

TABLE 1: Inspection Information Summary

Inspection Team

Lead Inspector: Jordan Noles, EPA

Inspector-in-Training: Bethany Terpin, EPA

Date of Facility Visit: August 18, 2021

Facility Identification

Name: Ideal Chemical & Supply, Co.
Street Address: 4025 Air Park Street
City: Memphis County: Shelby State: Tennessee Zip: 38118
EPA Facility ID No: 1000 0007 4126
Dun & Bradstreet (D&B) No: 7040348
Latitude: 35.038611
Longitude: -089.932222

Name, address, and phone of corporate parent company:

Owner/Operator: Ideal Chemical & Supply Co.
Mailing Address: 4025 Air Park Street
City: Memphis State: Tennessee Zip: 38118
Phone: (901) 363-7720

Name, title, and email of person responsible for 40 C.F.R. Part 68 implementation:

Name: Kelly McCabe
Title: Vice President – Operations
Phone: (901) 363-7720
Email: kmccabe@idealchem.com

Name and title of emergency contact:

Name: Kelly McCabe
Title: Vice President – Operations
Day phone: (901) 363-7720
24-hour Phone: (901) 277-2422
Email: kmccabe@idealchem.com

Name and titles of stationary source personnel involved in site inspection (*accompanied site tours, provided documents and explanations*):

Name: Kelly McCabe
Title: Vice President – Operations
Phone: (901) 363-7720
Email: kmccabe@idealchem.com

Name: Gabrielle Scranton
Title: Environmental Engineer-in-Training
Phone: (907) 372-7962
Email: gscranton@ensafe.com

Name: Kevin Arick
Title: Senior Project Manager, Compliance Services
Phone: (901) 372-7962
Email: karick@ensafe.com

Note: This is a union facility.

Date and Program Levels of Submitted Risk Management Plan

Date of initial submission: June 21, 1999

Date of most recent submissions: July 13, 2021

Process: Aqueous Ammonia Storage

Process ID: 1000116230

Program Level as reported in RMP: 2

NAICS code: 42469(Other Chemical and Allied Products Merchant Wholesalers)

3.0 Observations

The inspection of the Ideal Chemical & Supply, Co. facility evaluated various sections of the RMP regulations (40 C.F.R. Part 68, Program Level 2) and the inspection checklist included in “Guidance for Conducting Risk Management Programs Inspections under Clean Air Act Section 112(r).” The inspection included discussions with the facility representatives regarding a myriad of issues related to the operation of its chemical storage and distribution process, the facility’s RMP, a review of paperwork associated with the facility’s most recent Risk Management Plan, and a tour of the facility. An inspection in-brief and out-brief were conducted. There were no findings of note as a result of the inspection.

Inspection Report,

Prepared by:

**JORDAN
NOLES**

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JORDAN NOLES
Date: 2021.10.15
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Jordan Noles, Inspector
North Air Enforcement Section
U.S. EPA Region 4

Date

Approved by:

JASON DRESSLER

Digitally signed by JASON
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Date: 2021.10.15 10:01:09 -04'00'

Jason Dressler, Chief
North Air Enforcement Section
U.S. EPA Region 4

Date