

CAA112(r) INSPECTION REPORT

Name: Landus Cooperative - Collins	
Address: 70500 South Main Street, Collins, Iowa	Date of Inspection: September 21, 2022
County: Story	Case No: 22IA0921
Phone: (515) 817-2100	RMP No: 1000080142
High Risk: Yes	FRS No: 1000 0009 0929
CAA Title V: No	Program Level: Program 2
Mailing Address: 2321 North Loop Drive, Suite 220, Ames, Iowa 50010	
Process: anhydrous ammonia tank storage, nurse tanks, anhydrous ammonia bulk receiving, dispensing and appurtenances.	

SUMMARY OF OBSERVATIONS

A review of the Landus Cooperative documents and facility revealed the following deficiencies:

1. Landus Cooperative failed to include accident history data in hazard assessment as per §68.42(b).
2. Landus Cooperative failed to update accident history information as per §68.195(a).

INTRODUCTION

I, Diana Chaney, a Compliance Inspector with the U.S. Environmental Protection Agency (EPA), Region VII, inspected Landus Cooperative located in Collins, IA Lynelle Ladd an inspector in training on September 21, 2022.

The inspection was conducted to determine if the facility complies with Section 112(r) of the Clean Air Act (CAA), as amended in 1990. The inspection also included reporting provisions of the Emergency Planning and Community Right to Know Act (EPCRA) and the release reporting provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

EPA's regulations describing how these laws are to be implemented are found in the Code of Federal Regulations, Title 40, Part 68 (CAA), 355, 370, and 372 (EPCRA). The law and the implementing regulations 40 CFR 68, Chemical Accident Prevention Program (CAPP) require that the facilities must submit a complete Risk Management Plan (RMP) to the EPA for those

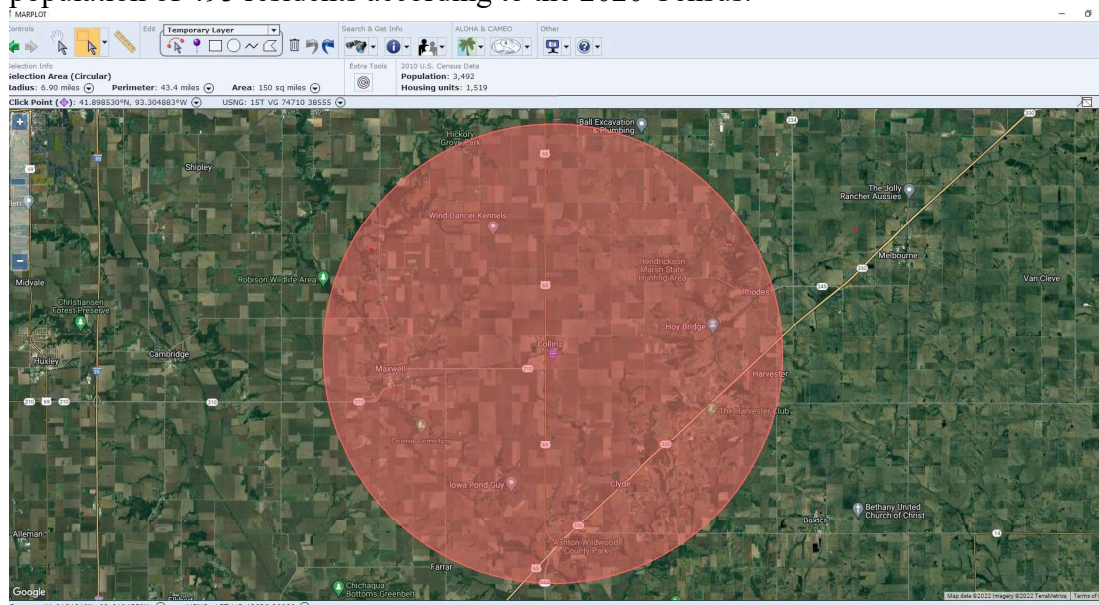
regulated chemicals they process in amounts above the applicable threshold quantities after June 21, 1999 and to implement the program described in the RMP.

HISTORY OF BUSINESS

Landus Cooperative - Collins is an Anhydrous Ammonia Retailer and provider of agronomy products located in Collins, Iowa. Landus Cooperative- Collins. Landus Cooperative- Collins is owned by the parent company Landus Cooperative. The parent company, [Landus Cooperative](#), has been in business under its current name since 2016 and has approximately 725 employees and operates more than 70 other agronomy facilities in Iowa and Minnesota, in addition to the facility in Collins.

Landus Cooperative uses the North American Industry Classification System (NAICS) code 424910, Agricultural chemicals merchant wholesalers, to classify its primary industrial operations.

Landus Cooperative is located at 70500 South Main Street, Collins, Story County, Iowa. Based on the 2010 Census, 3,492 residents which includes 1,519 housing units live within a 6.9 mile radius of the facility. The facility is located at the south end of the community of Collins which has a population of 495 residents according to the 2020 Census.



PERSONS INTERVIEWED AND INDIVIDUAL RESPONSIBILITIES

Name	Title/Responsibilities
Brad Chrisman	EHS Manager
Tom Hudson	Location Lead
Austin Jewell	Operations Tech
Chase Hunter	EHS Manager
Ahad Majeeb	EHS Director

OPENING CONFERENCE

The opening conference and inspection began on September 21st, 2022. Introductions of EPA inspection staff and facility representatives participating in the opening conference were made. Facility representatives participating in the opening conference were Brad Chrisman, Tom Hudson, Austin Jewell, and Chase Hunter . The facility representatives were told that the inspection would be performed under the authority of the CAA' s Chemical Accident Prevention Provisions. The inspection process was detailed to the facility representatives which includes discussing facility operations, reviewing, and obtaining scans or copies of applicable records, a facility walk-through and photographs of facility processes and operations. The facility representatives were notified that at the end of the inspection, an exit interview to explain inspection findings would be performed. At the end of the exit interview any questions the facility representatives had would be answered, they would be given copies of forms completed and a receipt for documents copied or scanned during the inspection. A Notice of Inspection Form (Attachment 1) was signed by Ahad Majeed at the end of the inspection .

The facility representatives were informed they had the right to claim Confidential Business Information (CBI) and informed that a Confidentiality Notice (Attachment 1) would be provided at the end of the inspection to make any CBI claims. The representatives were shown the CBI form. In addition to CBI, the facility representatives were told and provided with a copy of U.S. Federal Code 1001 and 1002 pertaining to false statements and documents.

RISK MANAGEMENT PLAN

Landus Cooperative seems to have completed the executive summary, off-site consequences analysis, and section nine information in an accurate & timely fashion. However, the accident history information does include the release which occurred on August 13th, 2019. This accident seems to be a reportable accidental release due to the evacuation of employees during the release. Due to the missing accident history information, I find the deficiency:

2. Landus Cooperative failed to update accident history information as per §68.195(a).

The risk management plan was submitted June 6th, 2019 and can be seen in Attachment #2.

HAZARD ASSESSMENT

The hazard assessment was requested, and the facility provided the documents which can be found in Attachment 3. The parameters for offsite consequence analysis were followed. RMP*Comp was utilized for the worst-case scenario (WCS) and alternative release scenario (ARS). The distance-to-endpoint (DTE) for Anhydrous Ammonia was 4.4 miles for the WCS and 0.3 miles for the ARS. The population potentially affected by WCS is 1,100. The offsite consequence analysis was generated on December 2nd, 2022.

SAFETY INFORMATION

Regarding the regulated chemical, Anhydrous Ammonia, at Landus Cooperative:

Quantity - pounds	
Maximum Intended Inventory	520,000
Actual Quantity at the Time of Inspection	
Quantity Listed on RMP	419,975

Landus Cooperative compiled information on the hazards of the regulated substances stored on site. The safety information included information pertaining to the hazards of Anhydrous Ammonia, which can be seen in Attachment 4.

HAZARD REVIEW

Landus Cooperative completed their last hazard review on December 2nd, 2021, using “What If” method. A document regarding how the hazard review is to be conducted was provided. The hazard review addresses hazards, safeguards, and equipment. A previous hazard review conducted June 5th, 2019, was also provided.

During the inspection the accident history information was requested as required per 68.42(b), Landus Cooperative was unable to provide the information at that time. Post inspection Landus Cooperative sent the information shared with the fire department which seems to include the information required by 68.42(b). Due to the accident history data missing from the hazard review at the time of the inspection, I find the deficiency:

- 1. Landus Cooperative failed to include accident history data in hazard assessment as per §68.42(b).**

The most recent process hazard analysis and extended accident history documents can be seen in Attachment 5.

STANDARD OPERATING PROCEDURES (SOPs)

The operating procedures for Landus Cooperative can be found in Attachment 6. The SOPs covered process that addressed all seven elements of each operating phase. The operating limits, consequences of deviation, steps required to correct or avoid deviation were all addressed, as well as the safety and health considerations. The SOPs were certified on December 2nd, 2021.

TRAINING

Landus Cooperative trains on employees on the hazards of anhydrous ammonia, as well as proper operating procedures. Employees are trained when they begin working at Landus Cooperative and refresher training is performed annually. The annual training tests attendee’s knowledge of anhydrous ammonia hazards. Training Policy and supporting documentation can be seen in Attachment 7.

MAINTENANCE

Landus Cooperative has a maintenance policy which includes Bulk tanks and Nurse tanks. The maintenance schedules are in accordance with ANSI CGA G-2.1 2014. The maintenance policy and inspection schedule for a bulk tank and nurse tank can be found in Attachment 8. This facility uses I-beams as for part of the barrier protection around the east bulk tank, this can be seen photo 11 in appendix 13.

COMPLIANCE AUDIT

Landus Cooperative provided the August 31, 2021, compliance audits, as well as, the July 28, 2020 compliance audit. The audits were conducted by Tom Hudson and Jason Lemmert. The compliance audits can be seen in Attachment 9.

INCIDENT INVESTIGATION

Landus Cooperative has prepared for Incident Investigation with a form can be found in Attachment 10. The form includes date of incident, date investigation began, incident description, contributing factors, and recommendations as a result.

EMERGENCY PLAN

The facility plans to CALL 911 in the event of a release. Landus Cooperative coordinates with the Story County LEPC and the Collins Volunteer Fire Department.

MANAGEMENT SYSTEM

Landus Cooperative provided a risk management program organization chart to document their management system, which can be seen in Attachment 12. Jason Lemmert oversees the majority of the implementation of the RMP at the facility. Electronic filing is delegated to Ahad Mujeeb.

CLOSING CONFERENCE

All scanned Recorded on the Receipt of Samples and Documents form, which was signed by Ahad Mujeeb. Preliminary Findings were reviewed, and it was explained that more maybe identified upon further review. Ahad Mujeeb signed the Preliminary Findings form. The signed forms can be seen in Attachment 1. The next steps were described to the facility, the report would be written, then reviewed by management, a case review officer would be assigned and finally the facility will be sent a copy of the finalized report. The inspection ended on September 21, 2022.

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Date: 2023.05.05 16:56:02 -05'00'

Diana Chaney
Compliance Inspector

DAVE HENSLEY Digitally signed by DAVE HENSLEY
Date: 2023.05.08 10:27:39 -05'00'

Dave Hensley
Chemical Accident Prevention Section Chief

ATTACHMENTS

- 1 – Inspection Forms
- 2 – Risk Management Plan
- 3 – Hazard Assessment
- 4 – Safety Information
- 5 – Hazard Review
- 6 – Standard Operating Procedures
- 7 – Training
- 8 – Maintenance
- 9 – Compliance Audit
- 10 – Incident Investigation
- 11 – Emergency Plan
- 12 – Management System
- 13 – Photo Log