



REGION 5
CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Tippecanoe Laboratories, Lafayette, Indiana

FROM: Jason Schenandoah, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Supervisor
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Tippecanoe Laboratories (Tippecanoe)

Facility Location: 1650 Lilly Rd, Lafayette, IN 47909

Date of Inspection: October 24, 2023

EPA Inspector(s):

1. Jason Schenandoah, Environmental Engineer
2. Sasa Dunovic, Environmental Engineer

Other Attendees:

1. Additional attendees are listed in Appendix A to this report.

Contact Email Address: mckenzie.temme@evonik.com

Purpose of Inspection: To ensure compliance with the Chemical Accident Prevention Provisions (CAPP) at 40 C.F.R. Part 68.

Facility Type: Chemical manufacturing facility

Regulations Central to Inspection: The CAPP, specifically the Risk Management Plan (RMP).

Arrival Time: 10:00 am

Departure Time: 5:40 pm

Inspection Type:

- ☐ Unannounced Inspection
- ☒ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☐ Provided Small Business Resource Information Sheet
- ☒ Small Business Resource Information Sheet not provided. Reason: Not a small business
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Tippecanoe personnel unless otherwise noted.

Process Description:

Tippecanoe operates various chemical manufacturing processes to create chemicals for special additives, nutrition and care, and smart materials. In addition to chemical manufacturing, Tippecanoe operates solvent recovery and a waste incineration process. The focus of this inspection was on a fermentation process utilizing anhydrous ammonia and storage of hydrochloric acid in solution. Ammonia is consumed in the fermentation process in one of 14 tanks to make the necessary chemicals for each batch. The hydrochloric acid in solution is stored in totes in a warehouse building separate from any chemical manufacturing process.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Photos and/or Videos: were not taken during the inspection.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

RMP documents in the following categories were reviewed during the inspection:

- Management
- Offsite consequence analysis (OCA)
- Process Safety Information (PSI)
- Process Hazard Analysis (PHA)
- Operating Procedures
- Training
- Mechanical Integrity

- Management of Change
- Pre-startup Safety Review
- Incident Investigation
- Compliance Audits
- Employee Participation
- Hot Work Permit
- Emergency Response
- RMP submittals

The following observations were made during the records review process:

PSI

- The process flow diagram for the ammonia process was a piping and instrumentation diagram with sections highlighted.

Training

- The last two operator three-year refresher trainings occurred in November 2017 and late March and early April 2021. A software system is used to initiate training as it becomes necessary, it did not occur for the 2021 training.

Management of Change

- The management of change procedure does not address whether training is necessary based on the change. The changes are communicated to the operators prior to restarting the process, but there is no documentation of the communications.

Incident Investigation

- A recommendation was made to add a preventative maintenance task to the monthly checks on the ammonia system to include peanut pressure relief valve checks. At the time of the inspection, it had been over a year since the recommendation had been created and the procedure had not been implanted yet.
- No formal communications to operators for incident reports is conducted.

Emergency Response

- Tabletop and field exercises documentation did not contain a list of participants.

CLOSING CONFERENCE

- ☒ Provided U.S. EPA point of contact to the facility

DIGITAL SIGNATURES

Report Author: JASON
SCHENANDOAH

Digitally signed by JASON
SCHENANDOAH
Date: 2023.12.20
11:17:41 -06'00'

Section Supervisor: NATHAN
FRANK

Digitally signed by
NATHAN FRANK
Date: 2023.12.20
14:13:06 -06'00'

Facility Name: Tippecanoe Laboratories
Facility Location: 1650 Lilly Rd, Lafayette, IN 47909
Date of Inspection: October 24, 2023

APPENDICES AND ATTACHMENTS

Appendix A: Sign in sheet

APPENDIX A: SIGN-IN SHEET

Sign Up Sheet

Facility: Tippecanoe Laboratories Date: 10-24-2023

Number	Attendee	Company/Agency	Phone	Email
01	Sasa Dunovic	GPA	312-333-8123	dunovic.sasa@epa.gov
02	Travis Kearney			Travis.Kearney@sectom
03	McKenzie Temme	Evonik	765-337-6856	mckenzie.temme@evonik.com
04	Timothy Hahn	Evonik	765-414-6957	tim.hahn@evonik.com
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14	Matt Baumgart	Evonik		Matt.Baumgart@evonik.com
15	Justin Price	Evonik	765-237-2123	justin.price@evonik.com
16	Jason Schumacher	USEPA	312-826-9506	schumacher.jason@epa.gov
17	Joe Lash	Evonik	Director of Technology	
18	Jerry Pando	Evonik	Director of Quality	
19				