



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
25063 CENTER RIDGE ROAD
WESTLAKE, OHIO 44145**

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Gaston Branch, Gaston, Indiana

FROM: Danny Nguyen, Risk Management Program (RMP) Inspector
WECAB, Multimedia Section

THRU: Mr. Brooke Furio, Section Supervisor
WECAB, Multimedia Section

TO: File

BASIC INFORMATION

Facility Name: Gaston Branch

Facility Location: 430 South Sycamore Street, Gaston, Indiana 47342

Date of Inspection: December 14, 2023

EPA Inspector(s):

1. Danny Nguyen, RMP Inspector, USEPA Region 5
2. Sasa Dunovic, RMP Inspector, USEPA Region 5

Other Attendees:

1. Marty Clock, Plant Manager, Gaston Branch
2. Cory Cocanower, Risk Management of Central Indiana

Contact Email Address: coryc@agbest.com

Purpose of Inspection: Compliance with the prevention of accidental release provisions found in Section 112(r) of the Clean Air Act (CAA), 42 U.S.C. §§7414(r)

Facility Type: Support activities for crop production

Regulations Central to Inspection: The Chemical Accident Prevention Provisions at 40 C.F.R. Part 68

Arrival Time: 9:55 AM (December 14, 2023)

Departure Time: 5:55 PM (December 14, 2023)

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 the Gaston Branch representatives unless otherwise noted.

Process Description:

The parent company for the Gaston Branch facility is AgBest LLC. Gaston Branch is one of three agriculture facilities in Indiana with the main office located in Granville, Indiana.

The facility has eight full time employees along with several hired seasonal employees. The facility operates 7:30AM to 4:30PM Monday through Friday. During the Summer, the facility operates on weekends to meet seasonal demands.

The Gaston Branch site receives all their bulk ammonia through third party tanker trucks. Ninety percent of the ammonia is brought in during April through May months. Ten percent is delivered from June to July to support corn production. Truck drivers are responsible for unloading ammonia from their tanker trucks to one of the two outdoor ammonia storage tanks using their own unloading equipment. Capacity of the above ground storage tanks are 18,000 and 30,000 gallons (hereafter "storage tanks"). There is not an auto-shutoff or active monitoring for overfilling the storage tanks. The storage tanks are not equipped with bleeder valves. The truck driver looks at the volume indicator to monitor current tank level and ensures the tank does not overfill beyond 85% of the total capacity. Tanker trucks can unload ammonia at any time of day or night whether an operator is on-site or not. There is a single unloading point that serves both storage tanks. The unloading connection is equipped with a back valve. It

was stated that only anhydrous ammonia from the tanker truck would be spilled if the unloading hose broke. The unloading and storage area is not equipped with ammonia sensors or alarms, and it is not actively monitored.

The Gaston Branch operators unload ammonia from the storage tanks and fill the ammonia into approximately 88 on-site 1000-gallon nurse tanks to be provided as product to support corn and crop production.

The Gaston Branch reports as RMP program level 2 facility.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

- Storage tanks were seventy seven percent full at the time of the inspection.
- Pipes around the storage tanks were corroded.
- It was observed that paint was excessively peeling off the storage tanks.
- Labels on the storage tanks were observed to be peeling off.
- No permanent or portable eye wash was available in the maintenance shop where ammonia could be present.
- Loading and unloading of ammonia is the responsibility of the truck drivers and could be done at any time of the day or night without a site operator present.
- No safeguards or administrative controls to prevent overfilling of the storage tanks.
- No ammonia sensors, alarms, or active monitoring in the storage tanks area.
- A public walk and pathway were observed next to the property and storage tank. Part of the wooden fence separating the public path from the site property was not intact.

Photos and/or Videos: were taken during the inspection.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

The following records were provided by the Facility representatives electronically to USEPA prior to the inspection and are filed on a secure One Drive folder provided by EPA Inspector Danny Nguyen under the folder "Gaston Branch Document Folder":

2015-02-26 SDS Sheet - Anhydrous Ammonia.pdf
2019-05-21 Operating Procedures - Gaston.docx
2019-05-21 Maintenance Manual - Gaston.pdf

Base Manual.pdf
Maintenance Manual Base Document.docx
2020-04-20 USEPA Incident Investigation Form - Gaston NH3.pdf
2020-04-20 Notes From Incident - Cory.docx
2020-04-20 Notes From Incident - Cory.pdf
2020-04-20 NRC Confirmation Email - Gaston NH3.pdf
2020-04-20 USEPA RMP Incident Investigation Form - Gaston NH3.pdf
2020-04-22 Map of Incident and Sample Points - Gaston.pdf
2020-04-22 SARA Title III Report - Gaston.pdf
5 Year Incident Review - Gaston.docx
2023-01-01 Emergency Action Plan - Gaston.pdf
Anhydrous Ammonia Incident Investigation Form.pdf
Marplot Map - Population Count - Gaston.pdf
Marplot Map - Worst Case Scenario - Gaston.pdf
RMP Comp - Worst Case - Gaston.pdf
Worst Case Base Document.docx
Alternate Case Base Document.docx
Marplot Map - Alternate Case Scenario - Gaston.pdf
Marplot Map - Population Count - Gaston.pdf
RMP Comp - Alternate Case - Gaston.pdf
2015-08-16 Compliance Audit - Gaston.pdf
2017-01-27 Compliance Audit - Gaston.pdf
2019-05-30 Compliance Audit - Gaston.pdf
2022-05-11 Compliance Audit - Gaston.pdf
2017-01-27 Hazard Review - Gaston.pdf
2019-05-21 Hazard Review - Gaston.pdf
2016-08-29 Integrity Testing NH3 System Part 1 - Gaston.pdf
2016-08-29 Integrity Testing NH3 System Part 2 - Gaston.pdf
2016-08-29 Tank Testing 18k no NB - Gaston.pdf
2016-08-29 Tank Testing NB77200 - Gaston.pdf
2017-06-22 OISC Inspection Report.pdf
2019-04-16 Bulk Storage Inspection - Gaston.pdf
2020-05-26 Annual Bulk Storage Inspection - Gaston.pdf
2021-03-22 Annual Bulk Storage Inspection - Gaston.pdf
2021-09-29 OISC Bulk Storage and Nurse Tanks Inspection - Gaston.pdf
2022-05-09 Bulk NH3 Storage Inspection - Gaston.pdf
1956 U1A Report for Bulk Tank - Gaston.pdf
1956 U1A Report for Bulk Tank - Gaston.pdf
1976 U1A Report for Bulk Tank - Gaston.pdf
2019-05-21 Executive Summary - Gaston.docx
Training Documents (19 total documents)
2019-06-04 Submission Certification - Gaston.pdf
2020-04-22 Voluntary Update Certification - Gaston.pdf

The following observations were made during the records review process:

Training:

- No documentation was provided that each employee operating a process had been trained or tested competent in the operating procedures.

Emergency Response (ER):

- No documentation was provided of coordination of response needs with local emergency planning and response organizations.
- No documentation was provided of annual coordination with local emergency planning and response organizations.

Incident Investigation:

- Incident investigations did not have a participant list to ensure team consists of at least one person knowledgeable in the process and other persons with appropriate knowledge and experience to thoroughly investigate.
- There were no recommendations from the incident investigation, so the resolutions and corrective actions were nonexistent.

Maintenance:

- The third-party contractors do all the maintenance at the site.
- The facility employees conduct a routine maintenance on the system's equipment and periodically replace pressure relief valves.
- No documentation was provided of training for employees involved in maintaining the integrity of the process.
- Mechanical integrity audits have not been conducted on the system's equipment except for the annual visual observations.

Safety Information (SI):

- There was no documentation provided or certification that equipment complies with recognized and generally accepted good engineering practices.

Operating Procedures (OPs):

- There were no initial startup, temporary operations, or normal shutdown procedures in the operating procedures.

- EPA was informed that there are no temporary operations at the site, that initial startup and normal shutdowns are part of normal operations therefore covered in normal operations procedures.
- OPs have not been updated as necessary whenever a major change has occurred and prior to startup of changed process.

CLOSING CONFERENCE

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

Areas of Concern:

- All observations identified above in the records review section.
- Pipes around the storage tanks were corroded.
- It was observed that paint was excessively peeling off the storage tanks.
- Labels on the storage tanks were observed to be peeling off.
- No permanent or portable eye wash was available in the maintenance shop where ammonia could be present.
- Loading and unloading of ammonia is the responsibility of the truck drivers and could be done at any time of the day or night without a site operator present.
- No safeguards or administrative controls to prevent overfilling of the storage tanks.
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POST INSPECTOR COMMUNICATION

Communication Log (Post Inspection):

- 12-15-23 Email: Mr. Cory Cocanower provided update of storage tank testing and inspection standards.
- 12-15-23 Email: Mr. Cory Cocanower provided update of references to agriculture exemption for storage tank inspection and testing.
- 12-15-23 Email: Mr. Cory Cocanower provided piping photos of new paint on storage tank and process piping (photos provided).

DIGITAL SIGNATURES

Report Author:

DANNY NGUYEN

Digitally signed by DANNY
NGUYEN
Date: 2024.02.12 20:30:37 -05'00'

Section Supervisor:

BROOKE FURIO

Digitally signed by BROOKE
FURIO
Date: 2024.02.13 07:43:25 -05'00'

Appendices and Attachments

1. Appendix A: Digital Image Log

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Danny Nguyen	2. Archival Record Location: <i>OneDrive/Desktop/Multi Media Section/112(r)/Inspections/Gaston Branch 14 Dec 2023/Photos</i>
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	DSCN0460.jpg	12/14/2023 / 2:01PM Eastern	Outdoor ammonia storage tank and sign with pipe color legend
2	DSCN0461.jpg	12/14/2023 / 2:01PM Eastern	Outdoor ammonia storage tank with peeling paint
3	DSCN0462.jpg	12/14/2023 / 2:01PM Eastern	Corroded process piping
4	DSCN0463.jpg	12/14/2023 / 4:02PM Eastern	Corroded process piping
5	DSCN0464.jpg	12/14/2023 / 2:02PM Eastern	Corroded process piping
6	DSCN0465.jpg	12/14/2023 / 2:02PM Eastern	Peeling and faded ammonia storage tank label
7	DSCN0466.jpg	12/14/2023 / 2:06PM Eastern	Nurse tanks used for ammonia storage
8	DSCN0467.jpg	12/14/2023 / 2:13PM Eastern	Piping and hoses at loading and unloading station
9	DSCN0468.jpg	12/14/2023 / 2:14PM Eastern	Piping and hoses at loading and unloading station
10	DSCN0469.jpg	12/14/2023 / 2:20PM Eastern	Ammonia storage tank volume indicator
11	DSCN0470.jpg	12/14/2023 / 2:28PM Eastern	Public walkway next to process equipment with broken fencing around site property

The following digital images were provided by the facility post inspection:

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Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	pro-KcJDXrjq.jpeg	Emailed on 12/15/2023	Cleaned up piping
2	Pro-oRfWK1de.jpeg	Emailed on 12/15/2023	Cleaned up piping
3	pro-yraVpLOn.jpeg	Emailed on 12/15/2023	Cleaned up piping