



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 155
Seattle, WA 98101

ENFORCEMENT &
COMPLIANCE ASSURANCE
DIVISION

**Clean Air Act - Section 112(r)
Risk Management Program
and EPCRA 312 – Tier II
Facility Inspection Report**

FACILITY INFORMATION:

Name: Carlisle Construction Materials, LLC
Physical Address: 19727 57th Avenue East, Puyallup, Washington 98375
Phone Number: (253) 271-3045
Latitude/Longitude: 47.076185, -122.351422
RMP Facility ID#: 1000 0021 9612
FRS ID#: 110054934675
EJ Concerns: No/62 percentile

CONTACT INFORMATION (RMP Implementation):

Name: Shawn Osler
Phone Number: (253) 271-3045
E-mail: shawn.osler@carlisleccm.com

EMERGENCY CONTACT INFORMATION:

Name: Shawn Osler
Phone (24-hr): (253) 973-7074
E-mail: shawn.osler@carlisleccm.com
Website: www.carlisleconstructionmaterials.com

TRIP DETAILS:

Inspection Date: June 16, 2021
Inspection Time: 09:00 through 11:45
Inspectors: Bob Hales, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Peter Phillips, US EPA Region 10 SEE Grantee, RMP Inspector
Ed Johannes, US EPA Region 10 SEE Grantee, EPCRA Inspector
Carman Marquez, US EPA Region 10, RMP Inspector in Training

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: October 29, 2012
Date of Latest Update: November 15, 2019

Process (Program 1, 2, 3) as reported in RMP:

Process ID	Description	Process Chemical ID	NAICS Code	Program Level	Chemical Name CAS Number	Quantity (lbs)
1000104494	Pentane Process	1000130874	32615	3	Pentane (109-66-0)	131,500
1000104494	Pentane Process	1000130875	32615	3	Isopentane [Butane, 2-methyl] (78-78-4)	130,250

PURPOSE:

The purpose of this inspection was to determine whether this facility is in compliance with Section 112(r) of the Clean Air Act and Title 40 Code of Federal Regulations (CFR) Part 68, Chemical Accident Prevention Provisions.

- The facility has been previously inspected in the past 5 years: No ☒ Yes ☐
If Yes, Date of Last Inspection:
- The facility is High Risk: No ☒ Yes ☐
- Joint EPCRA inspection: No ☐ Yes ☒

CAA Title V Air Permit:

Does the facility have a CAA Title V Permit? No ☐ Yes ☒
If Yes, Permit Number: 11336

RELEASE/ACCIDENT HISTORY:

Did the facility have a reportable release in the past 5 years? No ☒ Yes ☐
If Yes, Date and Description of the Release:

EPCRA TIER II REPORTING:

Did the facility submit the 2020 Tier II report to the SERC? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: 3/1/2021
If No, calendar year of the most recent Tier II:

Did the facility submit a Tier II to the LEPC and local fire department? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: 3/1/2021

INSPECTION ENTRY:

Bob Hales led the inspection entry. The inspection team met with Shawn Osler and Scott Redding at the Carlisle Construction Materials LLC manufacturing facility in Puyallup Washington. The team arrived at the facility at 09:00 and was joined by the following facility personnel:

Name	Title
Shawn Osler	Plant Manager
Scott Redding	Environmental Manager

Was a state/county/or local emergency representative present? No ☒ Yes ☐

If Yes, Name and Title of Representative:

The facility is a first responder: No ☒ Yes ☐

If No, Responding Agency:

The inspection team was escorted to a conference room located in the facility's office building. Introductions were made by Bob Hales, who provided a summary of the risk management program (RMP) and explained the purpose of the visit. Each team member presented his/her credentials.

EPA then requested an explanation of the facility's operations and any additional safety measures that should be taken during the site tour. Scott Redding gave a brief description of the facility, operations, and personal protective equipment required for the tour.

Prior to the inspection, EPA sent a certified notice of inspection letter to the facility informing them of the CAA Section 112(r)(6)(L) requirement that facility employees and employee representatives (such as a union representative) have the right to participate in the RMP inspection, and that a copy of the letter must be provided to the employee representative(s) and the letter posted in a manner accessible to employees in the facility.

The facility is unionized: No ☒ Yes ☐

If Yes, Name of Union:

An employee representative present during the facility visit: No ☒ Yes ☐

If Yes, Name/Title:

GENERAL INFORMATION:

The facility is regulated under the Risk Management Program as a Program Level 3 process and is owned and operated by Carlisle Construction Materials, LLC. The Hunter Panels facility located in Puyallup, Washington manufactures rigid polyisocyanurate foam insulating panels for use in commercial and industrial roofing applications. The company employs approximately 75 people at the facility. Hunter Panels occupies an approximate 400,000 square foot facility in Pierce County, Washington. Hunter Panels is a sister division of Insulfoam. Both divisions are part of Carlisle Construction Materials, LLC.

The polyisocyanurate foam insulating panels are produced by reacting a polyol (POLY) in a blend including a flame retardant and catalyst with polymeric diphenylmethane diisocyanate (ISO). Pentane material is used as an expanding or blowing agent in the production of the panels. Different varieties of pentane material can be used including various blends of n-pentane, isopentane, and cyclopentane. Isopentane and n-pentane are regulated under the Risk Management Program (RMP) Rule with a 10,000-pound threshold. The facility receives a liquid pentane blend via tank truck and stores it in a 25,000-gallon aboveground pressure vessel for use in the production process. The storage vessel has a storage capacity of 130,250 to 155,332 pounds depending upon which pentane blend is used. The combination of various isomers of pentane is simply referred to as pentane. No distinction is made to exclude a possible cyclopentane portion of the blend from the reported regulated substance. Their current Risk Management Plan (RMP) reported a maximum intended inventory of 131,500 pounds of n-pentane and 130,250 pounds of isopentane. The facility stores a maximum quantity of 155,332 pounds of cyclopentane which is not a regulated substance.

ON-SITE OBSERVATIONS:

The facility tour was conducted from approximately 09:30 to 10:15. The inspection team was escorted by Mr. Osler and Mr. Redding. The inspection team observed the pentane unloading station (photo #1), the pentane storage vessel (photo # 2), the storage tank pressure relief valve (photo # 3), the transfer piping and pumps for the unloading operations (photo # 5), the storage tank pressure relief valve and the pressure relief valve isolation valve (photo # 3 and 6), the pentane gas detector at the unloading rack (photo # 8), the pentane tank overflow detector (photo # 10), the pentane gas detector in the secondary containment for the pentane tank (photo # 11), the transfer station e-stop (photo # 12), the e-stop for the entire process (photo #13), the process e-stop at the building exit (photo # 15), the e-stop cable on the production floor (photo # 18), the finished foam conveyer (photo # 19), the pentane piping penetration from the outside storage to the process machinery (photo # 20), the pentane injection and mixing room (photo # 21), and the pentane gas detector at the end of the process (photo #23). The expansion process machinery is provided with forced air explosion proof ventilation equipment.

All of the photographs that were taken at the facility are included in Attachment A to this report.

After touring the RMP-covered process areas at the Carlisle Construction Materials, LLC, the inspection team returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a closing conference to Mr. Osler and Mr. Redding.

INFORMATION COLLECTED FROM FACILITY:

No additional information was collected from the facility.

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

1. During the tour of the facility and the covered process it was observed that they have installed an isolation valve between the pentane tank and the tank safety relief valve.

DOCUMENTS REQUESTED NOT INCLUDED IN REPORT:

The following documents were requested during the inspection but are not included in this report. These documents will still be reviewed to determine compliance with Section 112(r) of the Clean Air Act.

1. The standard that was followed for the installation of the isolation valve below the pentane tank safety pressure relief valve.

INSPECTION REPORT CERTIFICATION:

This is to certify that I, Bob Hales, was the lead inspector at this facility and that I have verified the accuracy of the observations in this inspection report:

Inspector Signature

RMP Coordinator/Approval

EPCRA Coordinator/Approval

Land Enforcement Section Chief/Approval