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

FACILITY INFORMATION:

Company Name:	The McGregor Company
Facility Name	Grangeville, ID 36
Physical Address:	38 Frontage Road Grangeville, Idaho 83530
Phone Number:	(509) 397-4355
Latitude/Longitude:	45.935489, -116.140893
EPA Facility ID#	1000 0006 8972

CONTACT INFORMATION (RMP Implementation):

Name:	Clark Capwell
Phone Number:	(509) 595-5005
E-mail:	clark.capwell@mcgregor.com

EMERGENCY CONTACT INFORMATION:

Name:	Levi Stone, Service Manager
Phone (24-hr):	(208) 507-0339
E-mail:	levi.stone@mcgregor.com
Website:	https://mcgregor.com/

AUDIT DETAILS:

Contact Date:	August 24, 2022
Inspector:	Edward Johannes, US EPA Region 10 SEE Grantee, Lead RMP Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date:	June 21, 1999
Date of Latest Update:	August 25, 2020

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)
1000110411	Storage & Transfer	1000137813	42491	2	Ammonia, Anhydrous (7664-41-7)	260,000

PURPOSE:

The purpose of this document review 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 and compliance with Section 312 of the Emergency Planning and Community Right to Know Act (EPCRA) which requires the Tier II Chemical Inventory Reports to be submitted annually. EPA Region 10 RMP inspectors are conducting offsite compliance monitoring when warranted for the RMP facility.

- The facility has been previously inspected in the past 5 years: No ☒ Yes ☐
  If Yes, Date of Last Inspection:
- Is the emergency contact information current? No ☐ Yes ☒
- The facility is High Risk: No ☒ Yes ☐

- Joint EPCRA inspection: No ☐ Yes ☒

<u>CAA Title V Air Permit</u>:
Does the facility have a CAA Title V Permit? No ☒ Yes ☐
If Yes, Permit Number:

<u>RELEASE/ACCIDENT HISTORY</u>:
Did the facility have a reportable release in the past 5 years? No ☒ Yes ☐
If Yes, Date and Description of the Release:

<u>EPCRA TIER II REPORTING</u>:
Did the facility submit their 2021 Tier II report to the SERC? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: January 7, 2022
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: January 18, 2022

<u>GENERAL INFORMATION</u>:
The facility is regulated under the Risk Management Program as a Program Level 2 process and is owned and operated by The McGregor Company. The primary activity at this facility is the storage and handling of anhydrous ammonia for sale to farmers. Anhydrous ammonia is received by truck and stored in one pressurized tank and distributed for direct application to the soil as a crop production nutrient. There are seven full-time employees on site.

<u>INFORMATION REQUESTED FROM FACILITY</u>:

1. **Hazard Review** – A copy of the last two Hazard Reviews with recommendations and tracking sheets.
2. **Compliance Audit** – A copy of the last two Compliance Audits with recommendations and tracking sheets.
3. **Training** – Training records for each process operator
    a. **Initial Training Records**: Training in the overview of the process and in the operating procedures, emphasis on the specific safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks.
    b. **Refresher Training Records**: Training of each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process.
    c. **Training Documentation:** Records which contains the identity of the employee, the date of training, and the means used to verify that the employee understood the training.
    d. Fill in **Facility Training Summary** sheet.
4. **Emergency Response** – A copy of emails, letters, or notes on meetings with LEPC and local responders including contact information (individual names, phone numbers, email addresses, organization name), dates, and coordination activities.

5. **Tier II Reporting** - Evidence of submission of a Tier II as described in 40 C.F.R. Part 370 to the State Emergency Response Commission (SERC), the Local Emergency Response Committee (LEPC), and the fire department (FD) with jurisdiction over the facility.

ANALYSIS OF DOCUMENTATION SUBMITTED:

1. **Hazard Review:** The McGregor Company provided their 2016 Process Hazard Analysis (PHA) conducted for Program 3 and the 2020 PHA conducted for Program 2. The 2016 PHA used the Asmark Institute® myPSM+RMP checklist method. The 2020 PHA used the Asmark Institute® myRMP checklist method. The 2016 PHA had one finding and recommendation which was closed on March 15, 2016. The 2020 PHA had no findings and recommendations and was conducted on July 31, 2020, by Levi Stone.
2. **Compliance Audit:** The facility provided their 2017 and 2020 Compliance Audit reports. Both audits used Asmark Institute® MyRMP Compliance Audit for Program 2 facilities checklist for the anhydrous ammonia storage and handling. The 2017 Compliance Audit was performed on August 21, 2017, and the 2020 Compliance Audit was performed on July 31, 2020. Both audits were conducted by Levi Stone. The 2017 and 2020 audits did not identify deficiencies at the facility.
3. **Training:** Nathan Duman, Service Manager, provided a completed Training Summary for five operators. The operators, the dates of initial and refresher training, and verification means for training are listed in the table below. The initial training records for the five operators was provided. The facility uses the Asmark Institute® MyPSM+RMP Operator Training and Qualification form for training records. These records show a list of subjects covered including safety and health hazards, emergency operations (including shutdown), and safe work practices applicable to the employee's job tasks. The forms include the evaluator's name and signature, date signed and operator's name and signature. The facility also provided annual refresher training records also using Asmark Institute® MyPSM+RMP Operator Training and Qualification form for four operators (see below). The means to verify training was thru demonstration by the operator.

Employee Name	Initial SOP Training Date	Last SOP Refresher Training Date	Verification Means
David Todd	2/27/2016	8/5/2020	Demonstration
Kevin Reuter	3/11/2016	8/5/2020	Demonstration
Michael Mizer	2/27/2016	8/5/2020	Demonstration
Frank Spencer	5/18/2016	8/5/2020	Demonstration
Nathan Duman	3/23/2022	-	Demonstration

4. **Emergency Response Coordination (Annually after 9/21/18):** A copy of the Fire Prevention Plan Review Documentation Certification Page was provided by the facility. It indicates that a Fire Prevention Plan and a copy of the Checklist for Emergency Responders was given to the Grangeville City and Rural Volunteer FD on January 10, 2022. It also includes a sign in sheet that shows personal from the FD and the McGregor Company participated in a tour of the facility on January 8, 2022. No notes on meetings, coordination activities, or contact with the LEPC were provided by the facility.
5. **Tier II Reporting:** The McGregor Company submitted the Grangeville facility 2021 Tier II on January 7, 2022, to the SERC, Boise, Idaho. They submitted the 2021 Tier II to the appropriate LEPC and FD on January 18, 2022. For this facility the LEPC is Idaho Disaster Management, Grangeville, Idaho, and the FD is Grangeville City and Rural Volunteer FD, Grangeville, Idaho.

The table below is a list and amount of Hazardous or Extremely Hazardous Substances over threshold reporting quantity (except for one) reported on-site by the facility on their 2021 Tier II.

Chemical Name	CAS Number	Amount (in lbs)
Anhydrous Ammonia	007664-41-7	50,000
40 Rock	007722-76-1	60,000
Ammonium Chloride Solution	012125-02-9	63,630
Ammonium Polyphosphate Sol.	068333-79-9	84,630
Ammonium Sulfate	007783-20-2	65,000
Ammonium Thiosulfate Solution	007783-18-8	81,760
Fertilizer, Liquid Blend	-	66,780
Gramoxone SL 2.0	001910-42-5	182
Monoammonium Phosphate	007722-76-1	35,000
Potash, Muriate	007447-40-7	35,000
RT 3	070901-12-1	39,690
Sulfur	007704-34-9	30,000
UAN Solution (28%-32%)	000057-13-6	90,780
Urea	000057-13-6	70,000

AREAS OF CONCERNS:

1. The McGregor Company Grangeville facility did not perform annual emergency response coordination activities required by 40 CFR § 68.93. The McGregor Company could not produce documentation that emergency response coordination activities were done prior to 2022. This requirement has been in effect since September 21, 2018.

The findings in this report will be discussed with the facility via telephone and email after certification of this report.

DOCUMENTS REQUESTED ON FOLLOW-UP:
The following documents were requested after the initial submission of documents. These documents were reviewed to determine compliance with Section 112(r) of the Clean Air Act.

1. Certified mail receipts showing dates the 2021 Tier IIs were mailed to the LEPC and local FD.

AUDIT REPORT CERTIFICATION:
This is to certify that I, Edward Johannes, was the lead inspector at this facility and that I have verified the accuracy of the observations in this inspection report:

EDWARD JOHANNES (Affiliate) Digitally signed by EDWARD JOHANNES (Affiliate) Date: 2022.12.16 11:05:45 -08'00'

Signature Date

JAVIER MORALES Digitally signed by JAVIER MORALES Date: 2022.12.16 13:03:22 -08'00'

RMP Coordinator/Approval Date

ERIN WILLIAMS Digitally signed by ERIN WILLIAMS Date: 2022.12.21 11:59:15 -08'00'

EPCRA Coordinator/Approval Date

Jennifer A Sullivan Digitally signed by Jennifer A Sullivan Date: 2022.12.21 13:59:23 -08'00'

Land Enforcement Section Chief/Approval Date