

United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report

Ardent Mills

Chattanooga, Tennessee

March 31, 2022

1.0 Introduction

The U.S. Environmental Protection Agency's efforts to reduce the likelihood and severity of chemical accidents includes planning and legislative initiatives such as the National Contingency Plan, the Emergency Planning and Community Right-to-Know Act (EPCRA), and the Accidental Release Prevention requirements under Section 112(r) of the Clean Air Act (CAA), as amended in 1990. This report outlines an inspection of the Risk Management Program (RMP) as mandated by Section 112(r)(7) of the CAA.

The focus of this inspection was to assess the RMP for the chlorine storage and use in the flour bleaching process at the Ardent Mills facility located in Chattanooga, Hamilton County, Tennessee. This facility was selected for inspection because it had never been inspected under the RMP. The inspection, which was conducted on March 31, 2022, consisted of an examination of program documentation as well as site reviews of various aspects of facility operations. Personnel from the facility participated throughout the inspection. Requested program documents were provided for further review off-site. This report will provide a background of the facility and a listing of observations.

2.0 Background

The Ardent Mills facility is located in Chattanooga, Tennessee. The facility uses chlorine in the flour milling process as a way to whiten the flour. The process is regulated as program level 3. According to facility records, the facility has a maximum of 12,000 pounds of chlorine on site. The chlorine storage and use at the facility is subject to the RMP requirements of 40 C.F.R. Part 68 and EPCRA Section 302. The background specifics are summarized as follows in Table 1.

TABLE 1: Inspection Information Summary

Inspection Team

Lead Inspector-In-Training: Bethany Terpin, EPA

Inspector: Jordan Noles, EPA

Inspector-In-Training: Chet Gala, EPA

Date of Facility Visit: March 31, 2022

Facility Identification

Name: Ardent Mills
Street Address: 1B Riverside Lane
City: Chattanooga County: Hamilton State: Tennessee Zip: 37406
EPA Facility ID No: 1000 0013 4302
Dun & Bradstreet (D&B) No: 622781300
Latitude: 35.0811868
Longitude: -085.272378

Name, address and phone of corporate parent company:
Owner/Operator: Ardent Mills, LLC
Mailing Address: 1875 Lawrence Street, Suite 1200
City: Denver State: Colorado Zip: 80202
Phone: (866) 994-3069

Name, title, and email of person responsible for 40 C.F.R. Part 68 implementation:
Name: Matt Trancucci
Title: Plant Manager
Phone: (423) 697-6236
Email: Matt.Trancucci@ArdentMills.com

Name and title of emergency contact:
Name: Matt Trancucci
Title: Plant Manager
Day phone: (423) 697-6236
24-hour Phone: (478) 258-4601
Email: Matt.Trancucci@ArdentMills.com

Name and titles of stationary source personnel involved in site inspection (*accompanied site tours, provided documents and explanations*):
Name: Matt Trancucci
Title: Plant Manager
Phone: (423) 697-6236
Email: Matt.Trancucci@ArdentMills.com

Name: Al Hargis
Title: Head Miller
Phone: (423) 834-1714
Email: don.hargis@ardentmills.com

Name: Kenneth Hill
Title: Maintenance Manager
Phone: (423) 618-0874
Email: Kenneth.hill@ardentmills.com

Note: This is not a union facility.

Date and Program Levels of Submitted Risk Management Plan

Date of initial submission: September 11, 2014

Date of most recent submissions: August 19, 2021

Process: Flour Bleaching

Process ID: 1000118349

Program Level as reported in RMP: 3

NAICS code: 311211 (Flour Milling)

3.0 Observations

The inspection of the Ardent Mills facility evaluated various sections of the RMP regulations (40 C.F.R. Part 68, Program Level 3) and the inspection checklist included in “Guidance for Conducting Risk Management Programs Inspections under Clean Air Act Section 112(r).” The inspection began with an opening discussion of facility operations. The discussion was followed by a tour of the facility’s chlorine storage areas and the flour bleaching process in the mill. EPA inspectors then requested paperwork associated with the facility’s Risk Management Plan (RMPlan). The documents were reviewed by EPA inspectors on-site and later off-site. An inspection out-brief was conducted where EPA inspectors described their observations. Observations from the RMP inspection at the Ardent Mills facility are discussed below:

1. 40 C.F.R. § 68.39(a) requires the owner or operator to maintain the following records on the offsite consequence analyses: For worst-case scenarios, a description of the vessel or pipeline and substance selected, assumptions and parameters used, and the rationale for selection; assumptions shall include use of any administrative controls and any passive mitigation that were assumed to limit the quantity that could be released. Documentation shall include the anticipated effect of the controls and mitigation on the release quantity and rate.
 - At the time of the inspection, facility representatives were not able to provide documentation of the items listed above on the offsite consequence analysis for worst-case scenarios.
2. 40 C.F.R. § 68.39(b) requires the owner or operator to maintain the following records on the offsite consequence analyses: For alternative release scenarios, a description of the scenarios identified, assumptions and parameters used, and the rationale for the selection of specific scenarios; assumptions shall include use of any administrative controls and any mitigation that were assumed to limit the quantity that could be released. Documentation shall include the effect of the controls and mitigation on the release quantity and rate.
 - At the time of the inspection, facility representatives were not able to provide documentation of the items listed above on the offsite consequence analysis for alternative release scenarios.

3. 40 C.F.R. § 68.39(e) requires the owner or operator to maintain the following records on the offsite consequence analyses: Data used to estimate population and environmental receptors potentially affected.
 - At the time of the inspection, there were no records provided on the data used to estimate population and environmental receptors potentially affected.
4. 40 C.F.R. § 68.67(e) requires the owner or operator to establish a system to promptly address the team's findings and recommendations from the Process Hazard Analysis (PHA); assure that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete actions as soon as possible; develop a written schedule of when these actions are to be completed; and communicate the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions.
 - At the time of the inspection, the PHA completed in 2021 had a list of recommendations and completion dates, but it did not include a schedule of when actions were to be completed. Therefore, there is no way to assure that recommendations were resolved in a timely manner.
5. 40 C.F.R. § 68.69(a)(2) requires the owner or operator to develop and implement written operating procedures that address consequences of deviations and steps required to correct or avoid deviation.
 - At the time of the inspection, none of the operating procedures addressed consequences of deviations or steps required to correct or avoid deviation.
6. 40 C.F.R. § 68.69(c) requires the owner or operator to certify annually that operating procedures are current and accurate.
 - At the time of the inspection, there was no evidence that the facility certifies operating procedures annually.
7. 40 C.F.R. § 68.79(d) requires the owner or operator to promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected.
 - At the time of the inspection, the compliance audit completed in 2019 did not have an action plan to respond to the findings of the audit, and it did not document that deficiencies had been corrected.

Inspection Report,

Prepared by:

BETHANY TERPIN

Digitally signed by BETHANY
TERPIN

Date: 2022.05.20 14:51:38 -04'00'

Bethany Terpin, Inspector-In-Training
North Air Enforcement Section
U.S. EPA Region 4

Date

JORDAN NOLES

Digitally signed by JORDAN
NOLES

Date: 2022.05.23 15:00:05 -04'00'

Jordan Noles, Inspector
North Air Enforcement Section
U.S. EPA Region 4

Date

Approved by:

JASON DRESSLER

Digitally signed by JASON
DRESSLER

Date: 2022.05.24 07:32:57 -04'00'

Jason Dressler, Section Chief
North Air Enforcement Section
U.S. EPA Region 4

Date