



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: Pratum Co-op
Physical Address: 28410 Milliron Road, Junction City, OR 97448
Phone Number: (541) 998-1121
Latitude/Longitude: 44.170872/-123.229875
RMP Facility ID#: 100000052774
FRS ID#: 110070864192
EJ Concerns: No (Below 80%)

CONTACT INFORMATION (RMP Implementation):

Name: Michael Kesling
Phone Number: (541) 998-1121
E-mail: mkesling@pratumcoop.com

EMERGENCY CONTACT INFORMATION:

Name: Michael Kesling
Phone (24-hr): (541) 501-1596
E-mail: mkesling@pratumcoop.com

TRIP DETAILS:

Inspection Date: February 6, 2024
Inspection Time: 0900 hours through 0940 hours
EPA Inspection Team:

Peter Phillips, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Terry Garcia, US EPA Region 10 SEE Grantee, RMP Inspector
Edward Johannes, US EPA Region 10 SEE Grantee, RMP Inspector
Robert Faries, Weston Solutions, Inc., EPA START Contractor
Ken Valder, Weston Solutions, Inc., EPA START Contractor

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: August 5, 1999
Date of Latest Update: December 18, 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)
1000113499	S&H/Fertilizer Blend	1000141802	325314	3	Ammonia, Anhydrous (7664-41-7)	139,915

PURPOSE:

The purpose of this inspection was to determine if 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 ☐
- 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 ☐

RELEASE/ACCIDENT HISTORY:

Did the facility have a reportable release in the past 5 years? No ☒ Yes ☐

EPCRA TIER II REPORTING:

Did the facility submit the 2022 Tier II report to the SERC? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: February 17, 2023

Did the facility submit a Tier II to the LEPC and local fire department? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: February 17, 2023

INSPECTION ENTRY:

Peter Phillips led the inspection entry. The EPA Inspection Team (EPA) met with facility representatives Mandy Rebel, Maryhelen Sams, Michael Kesling at the Pratum Co-op facility in Junction City, Oregon. EPA arrived at the facility at 0900 and was joined by the following facility personnel:

Name	Title, Organization
Mandy Rebel	Compliance Director, Pratum Co-op
Maryhelen Sams	Safety Director, Pratum Co-op
Michael Kesling	Site Manager, Pratum Co-op

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

The facility is a first responder: No ☒ Yes ☐

If No, Responding Agency: Junction City Fire Department

Facility representatives escorted EPA to a conference room located in the facility's office building. Lead Inspector Peter Phillips, introduced all parties present, provided a summary of the Risk Management Program (RMP), and explained the purpose of the visit. Each EPA Inspector presented their credentials.

EPA requested an explanation of the facility's operations and any additional safety measures that should be taken during the site tour. Michael Kesling 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 ☐

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

GENERAL INFORMATION:

The facility is regulated under RMP rule as a Program Level 3 facility and is owned and operated by Pratum Co-op. The facility's operations included agricultural chemical handling, storage, blending, retail sales, and distribution. Anhydrous ammonia was stored in a 30,000-gallon pressure vessel. Due to financial inefficiencies and market pressures Pratum Co-op chose to decommission the anhydrous ammonia pressure vessel and cease ammonia blending operations. On December 27, 2023, Central Washington Refrigeration performed the required maintenance to decommission the pressure vessel. On January 3, 2024, Pratum Co-op submitted a Risk Management Program De-Registration Form to the EPA.

ON-SITE OBSERVATIONS:

EPA toured the facility from approximately 0910 hours to 0930 hours, escorted by facility representatives Michael Kesling, Mandy Rebel, and Maryhelen Sams. The facility lead the inspection team out of the main office building into the west lot. EPA observed the decommissioned anhydrous ammonia pressure vessel and confirmed it had been decommissioned and marked appropriately (Photos 1-4).

After viewing the empty tank, EPA made their way to the south lot, passing an emergency eyewash and shower station as well as a fire extinguisher (Photo 5). The south lot contained the tank farm surrounded by a secondary containment (Photos 6-8).

The team entered the chemical storage building and observed various products and EPCRA chemicals (Photos 9-10). An eyewash station and flammable storage area were also located in the chemical storage building (Photo 11).

Upon exiting the chemical storage building the inspection team made their way to the main shop, passing a product loading area (Photo 12). A windsock was observed on the southeast corner of the building and used oil tanks were marked next to the main entrance (Photo 13). Within the main shop were several products including herbicides and other EPCRA chemicals. Spill control materials were also observed in the main shop (Photos 14 & 15).

After touring the RMP-covered process areas at the facility, EPA returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to Michael Kesling, Mandy Rebel, and Maryhelen Sams.

INFORMATION COLLECTED FROM FACILITY:

1. Risk Management Program De-Registration Form
2. Management of Change Determination Form
3. 2022 Emergency and Hazardous Chemical Inventory
4. Sign-in Sheet

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

No areas of concern were identified during the inspection.

DOCUMENTS REQUESTED NOT INCLUDED IN REPORT:

No additional documents were requested at the time of the inspection.

INSPECTION REPORT CERTIFICATION:

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

Peter Phillips

Digitally signed by Peter Phillips
Date: 2024.04.24 10:56:46 -07'00'

Inspector Signature

JAVIER MORALES

Digitally signed by JAVIER
MORALES
Date: 2024.04.24 11:20:38 -07'00'

RMP Coordinator/Approval

ERIN WILLIAMS

Digitally signed by ERIN WILLIAMS
Date: 2024.04.24 13:13:47 -07'00'

EPCRA Coordinator/Approval

**MATTHEW
QUARTERMAN**

Digitally signed by MATTHEW
QUARTERMAN
Date: 2024.04.25 07:38:49 -07'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: Pratun Co-op

City, State: Junction City, Oregon

Photographer: Robert Faries, Weston Solutions

File	Photo Layout ID	Date	Time	Description
Photo1.jpg	1	2/6/2024	10:00 a.m.	Decommissioned 30,000-gallon Anhydrous Ammonia pressure vessel. Location in Facility: West lot.
Photo2.jpg	2	2/6/2024	10:12 a.m.	Decommissioned 30,000-gallon Anhydrous Ammonia pressure vessel. Location in Facility: West lot.
Photo3.jpg	3	2/6/2024	10:13 a.m.	Decommissioned 30,000-gallon Anhydrous Ammonia pressure vessel. Location in Facility: West lot.
Photo4.jpg	4	2/6/2024	10:13 a.m.	Decommissioned 30,000-gallon Anhydrous Ammonia pressure vessel. Location in Facility: West lot.
Photo5.jpg	5	2/6/2024	10:15 a.m.	Eye wash station, emergency shower, and fire extinguisher. Location in Facility: West lot.
Photo6.jpg	6	2/6/2024	10:18 a.m.	Tank farm and secondary containment. Location in Facility: South Lot.
Photo7.jpg	7	2/6/2024	10:21 a.m.	Out-of-service storage tank. Location in Facility: Tank farm.
Photo8.jpg	8	2/6/2024	10:22 a.m.	Ammonium Nitrate storage tank and secondary containment. Location in Facility: Tank farm.
Photo9.jpg	9	2/6/2024	10:22 a.m.	Chemical storage building. Location in Facility: South lot.
Photo10.jpg	10	2/6/2024	10:23 a.m.	Flammable storage area, chemical products, and EPCRA chemicals. Location in Facility: Chemical storage building.
Photo11.jpg	11	2/6/2024	10:24 a.m.	Emergency eye wash station. Location in Facility: Chemical storage building.

Photo12.jpg	12	2/6/2024	10:26 a.m.	Product loading zone. Location in Facility: South lot.
Photo13.jpg	13	2/6/2024	10:26 a.m.	Windsock and used oil containers in front of the main shop. Location in Facility: South lot.
Photo14.jpg	14	2/6/2024	10:27 a.m.	Triclopyr 4E herbicide storage and spill control material. Location in Facility: Main shop.
Photo15.jpg	15	2/6/2024	10:27 a.m.	Fertilizer storage. Location in Facility: Main shop.