



REGION 5

CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Hawkins Industrial Group – Minneapolis, Minneapolis, Minnesota

FROM: Natalia Vazquez, Environmental Engineer
AECAB (MI/WI)

THRU: Sarah Marshall, Section Supervisor
AECAB (MI/WI)

TO: File

BASIC INFORMATION

Facility Name: Hawkins Industrial Group - Minneapolis

Facility Location: 3100 East Hennepin Avenue, Minneapolis, MN 55413

Date of Inspection: July 16, 2024

EPA Inspector(s):

1. Natalia Vazquez, Environmental Engineer
2. Matthew Walters, Environmental Engineer

Other Attendees:

1. Mitchell Kruse, Safety Specialist
2. Travis Haus, Senior Environmental Specialist
3. Steve Plucinak, HSE Director
4. Bryan Bennett, Assistant Plant Manager
5. Steve Schneider, Plant Manager
6. Jeff Stasica, Union Representative and Hawkins Operator
7. Tony Winchester, Business Agent, Teamster Union Local 638 (not an employee at the site)

Contact Email Address: HSE@hawkinsinc.com

Purpose of Inspection: Determine compliance with 40 C.F.R. Part 68 Chemical Accident Prevention Provisions

Facility Name: Hawkins Industrial Group – Minneapolis

Facility Location: Minneapolis, Minnesota

Date of Inspection: July 16, 2024

Facility Type: warehouse that stores, among other substances, aqua ammonia

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

Arrival Time: 12:30 p.m.

Departure Time: 3:15 p.m.

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 applicable
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Jeff Stachecus, Steve Schneider, Travis Haus, Steve Plucinak, Bryan Bennett, Mitch Kruz unless otherwise noted.

Process Description:

Hawkins Industrial Group – Minneapolis (“Hawkins” or “Facility”) is a liquid chemical distribution facility and warehouse. The Facility stores mostly corrosives, but it has other types of chemicals such as oxidizers as part of components of blends that are made on-site. The regulated substance stored on site above the regulatory threshold is ammonium hydroxide 26’, that is, aqua ammonia with a concentration above 20 percent. The Facility only warehouses aqua ammonia, which it receives prepackaged and does not open.

Staff Interview:

The Facility is operated Monday through Friday, from 7:00 am to 5:00 pm. Hawkins has about 31 operators at the facility. This site has been in operation since 1938. Hawkins is a publicly traded company.

The process is subject to the OSHA process safety management (PSM) standard.

The Facility eliminated its anhydrous ammonia storage regulated process at least 20 years ago. The aqua ammonia stored at the Facility is usually manufactured at other Hawkins facilities, but the company purchases it when necessary. The Facility eliminated its aqua ammonia packaging process and a copy of the MOC, training forms and PSSR associated with discontinuing the process were

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provided. At the time of the inspection the Facility is only distributing aqua ammonia. The packaging and blending processes now only use ammonia with a concentration of 19 percent or less.

The Facility is interested in no longer being subject to 40 C.F.R Part 68 Chemical Accident Prevention Provisions by reducing its aqua ammonia quantity below the threshold.

Aqua ammonia is stored in three different size containers: 15-gallon (known as Deldrums), 55-gallon, and 330-gallon IBC totes. The Deldrums do not have a designated place in the rack, only a general area within the warehouse, specifically two racks. The Deldrums are never stacked. The 55- gallon drums and IBC totes have tamper seals and the Deldrums have tamper tape. The IBC totes are owned by Hawkins. The IBC totes are stacked no more than two totes high. The 55-gallon and the IBC totes are not stored in racks.

Hawkins has chemicals other than corrosive as part of components, that is chemicals that will be blended with other chemicals. The Facility mostly stores corrosives; other chemicals on-site are hydrofluorosilicic acid, caustic polymers for municipal drinking water treatment facilities. No reactions take place on site. The Facility has general Department of Transportation (DOT) compatibility charts for the chemical on site, no site specific compatibility charts.

Hawkins uses forklifts to move aqua ammonia containers.

Warehouse's inventory is tracked with Oracle-driven system.

Hawkins has a spill kit on site that includes sponges, booms, sodium bicarbonate to neutralize acids, and empty containers. Emergency response team would use spill kit for aqua ammonia.

Shower and eye wash is inspected once a week by verifying that water is at a proper temperature.

Fire protection sprinkler in building, inspected once per year. Fire protection sprinkler is a wet system connected to a fire alarm, and it is around 20 years old. The expected response time for Minneapolis Fire Department is six minutes. Hawkins stated that it follows the Hazardous Materials code from the National Fire Protection Association.

No emergency ventilation system on site.

Receiving and shipping staging areas are next to each other. Aqua ammonia is staged with other chemicals and treated the same way as other chemicals.

Worst-case release scenario is the release from one IBC tote for 10 minutes. Alternative release scenario 2010 Census was used, it may not have capture total population due to college housing within the release radius. The alternative release scenario in the reviewed record named "BP-10-RMP

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Management Plan” was different to the one in the Risk Management Plan (RMP). The alternative release scenario in the RMP considers an old process and is no longer relevant.

Maximum intended inventory is 48,000 pounds, but this is not the current inventory. The viewed inventory tracking system had the 26 55-gallon drums broken by lot number and it had six IBC totes. Hawkins’s representatives informed EPA inspectors that the four IBC totes, not observed during the site tour were on a nearby row.

All employees receive training online. Operators are either on production or shipping/receiving. Regardless of an operator’s responsibilities, all are trained on aqua ammonia handling (using the SOP); PSM/RMP; DOT hazards; label reading; Environment, Health, and Safety; and driving a forklift. Every third Thursday the facility has a planned shutdown to provide safety training such as PSM, forklift refreshers. The month of June covered forklift operation. Any employee can raise concern with the training available (informal procedure). On-the job training is also provided.

Hawkins stated that a new hire can take up to a year to go through all training material, initial safety training completed within the first 60 days. Hawkins stated that initial safety training covers 17 modules including personal protective equipment, forklift and SDS; each module has a test. Annual refresher for 17 modules.

3rd-party service provides service for all forklifts, preventative maintenance is done quarterly basis. No routine maintenance is done on fire sensors. There are no ammonia sensors in the warehouse.

The contractors (forklift and electrician) are not allowed to come into contact with aqua ammonia storage containers at any time. Contractor vetting includes background check, if no background check is in place the contractor will be escorted at all times. Contractors are always shadowed if in the chemical warehouse due to DEA and DHS requirements. A contractor firm was hired to assist with the Process Hazard Analysis (PHA) evaluation.

No incidents have taken place between 2022 and 2024. The November 2019 incident took place at a process that is no longer on site.

All employees have access to the electronic version of the safety data sheets. Every third Friday the “Safety Committee” meets, this includes one operator per building, EHS personnel and the employee holding the Chairman position. The Safety Committee meetings are employee driven. Any safety concerns are elevated to the executive level.

Mike Bolduc, who is listed as Hawkins employee in the PHA, no longer works at the company. It was unknown if other Hawkins employees participated in the PHA. The 2021 PHA resolution tracker was reviewed (viewed on screen). Didn’t have alarm consideration recommendation logged in their tracker and evacuation map was updated on 7/1/2022.

No flooding risk expected at the site. No rail service at the building.

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TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

EPA inspectors observed aqua ammonia Deldrums stored underneath phosphoric acid 85% and sulfuric acid 30% in metal racks.

EPA inspectors observed 26 55-gallons aqua ammonia drums with manganese sulfate 29% to the left side of the 55-gallon drums. Additionally, there were two aqua ammonia IBC totes to the right of the 55-gallon drums and sulfuric acid 66' to the right side of IBC totes.

Eye wash and shower tag with inspection dates had dates between April 22, 2024, and July 17, 2024.

Fire protection sprinkler system's tag had the following years: 2022 and 2023.

Photos and/or Videos: were taken during the inspection and are listed in Appendix A.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

Records review prior to inspection

1. BP-10_Compliance Audit 25OCT2019.pdf (13 pages)
2. BP-10_Compliance Audut_09NOV2022.pdf (16 pages)
3. BP10_PHA 2016 Ammonia.pdf (19 pages)
4. Minneapolis Facility PHA – October 2021 5 year Revalidation – Final Report.pdf (11 pages)
5. MOC-BP10-080323-01_FINAL.pdf (7 pages)

Records review during the inspection

1. Worst release scenario and alternative release scenario portion within the RMP Management Plan (copy requested);
2. Aqua ammonia inventory (55-gallon drums and IBC totes);
3. PHA recommendation tracker

CLOSING CONFERENCE

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

Requested documents:

1. RMP Management Plan (28 pages)

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2. Safety Data Sheet for Ammonia 26' IBC tote (9 pages)
3. Records on specifications on IBC tote (one page)
4. Work instruction for ammonia handling processes (four pages)
5. Standard Operating procedure for shipping and receiving (15 and 10 pages respectively)
6. Compatibility chart (two pages)
7. Sprinkle system calculation – this was not submitted
8. Sprinkle system photograph (seven photographs)
9. Compliance audit tracker (spreadsheet)
10. Last evaluation forklift contractor (one page)
11. Emergency Response Plan (59 pages)
12. Most recent coordination activity with Minneapolis Fire Department (four pages)
13. Compliance audit tracker (for the last two audits, spreadsheet)

Hawkins submitted a copy of an inspection completed on the sprinkler system, “Form for Inspection, Testing and Maintenance of Dry Pipe Fire Sprinkler Systems” from May 28, 2020, completed by a contractor. This record was submitted in place of the sprinkler system calculations.

Concerns: Hawkins discontinued the packaging aqua ammonia process and completed a MOC and PSSR for this change. The MOC was started on August 3, 2023 and the PSSR has end date, January 24, 2024. The alternative release scenario in the July 8, 2020 RMP is the overfilling of a container in the packaging aqua ammonia process. EPA inspectors reminded the Facility that 40 C.F.R. § 68.190(b)(6) requires a RMP be updated within 6 months of a change that requires a revised offsite consequence analysis as provided in 40 C.F.R. § 68.36.

DIGITAL SIGNATURES

Report Author: NATALIA
VAZQUEZ RIVERA  Digitally signed by NATALIA
VAZQUEZ RIVERA
Date: 2024.08.21 15:52:44 -05'00'

Section Supervisor: SARAH
MARSHALL  Digitally signed by SARAH
MARSHALL
Date: 2024.08.26 12:01:48 -05'00'

APPENDICES

1. Appendix A: Digital Image Log and Digital Video Log

Facility Name: Hawkins Industrial Group – Minneapolis

Facility Location: Minneapolis, Minnesota

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APPENDIX A: DIGITAL IMAGE LOG AND DIGITAL VIDEO LOG

Inspector Name: Natalia Vazquez **Archival Record Location:** [Photos](#)

Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	IMG_0769.JPG	7/16/2024 13:10 CDT	15 gallon drums (known as Deldrums) of ammonia (black on the bottom of the storage rack); these drums were underneath phosphoric acid 85% and sulfuric acid 30% drums at the time of the inspection
2	IMG_0770.JPG	7/16/2024 13:12 CDT	two 330-gallon IBC totes with aqua ammonia
3	IMG_0771.JPG	7/16/2024 13:12 CDT	Aqua Ammonia label on IBM drum (Ammonia Hydroxide 26')
4	IMG_0772.JPG	7/16/2024 13:12 CDT	Safety Label about handling aqua ammonia on the IBM tote
5	IMG_0773.JPG	7/16/2024 13:17 CDT	26 55-gallon drums with aqua ammonia