

CAA112(r) INSPECTION REPORT

Name: Heartland Coop - Henderson	
Address: 301 South East Street Henderson, IA 51541	Date of Inspection: September 28, 2022
County: Mills	Case No: 22IA0928
Phone: (712) 825-3561	RMP No: 1000076493
High Risk: No	FRS No: 1000 0009 5513
CAA Title V: No	Program Level: Program 2
Mailing Address: PO Box 110, Henderson, Iowa 51541	
Process: Heartland Coop receives, stores, and distributes anhydrous ammonia to local farmers for use as a crop nutrient. (NAICS Code 42491)	

SUMMARY OF OBSERVATIONS

A review of the Heartland Coop documents and facility revealed the following deficiencies:

1. The facility failed to ensure that the most recent census data, or other updated information, to estimate release-affected population was used in the preparation of the facility offsite impact hazard assessment as required by 40 CFR 68.30(c).
2. The facility failed to ensure that the bulk tanks were labeled as required by ANSI/CGA G-21.1-2014 section 6.6.2. Per 40 CFR 68.48(b). Safety Information, the facility should ensure compliance with recognized and generally accepted good engineering practices which includes ANSI/CGA G-21.1-2014.
3. Pursuant to 40 CFR 68.56(a), Maintenance, the owner operator shall implement procedures to maintain the on-going mechanical integrity of the process equipment as per generally accepted good engineering practices which includes ANSI/CGA G-21.1-2014.
 - a. The facility failed to ensure that the integrity of the bulk anhydrous ammonia storage tank supports, and footings is maintained as required by ANSI/ CGA G-21.1-2014 section 6.4.1.
 - b. The facility failed to ensure that the barriers protecting the bulk anhydrous ammonia tanks was sufficient to prevent damage to the tanks from vehicle impact as required by ANSI/ CGA G-21.1-2014 section 6.7.1.b.
 - c. The facility failed to ensure that the pressure relief valves are replaced on or before the change by date as required by ANSI/ CGA G-21.1-2014 section 5.8.16.

4. **The facility failed to ensure that the reinforcement for the fill bulkheads/check valves was adequately designed to prevent pull-away-while connected incidents as required by ANSI/ CGA G-21.1-2014 section 5.10.8.1. 40 CFR 68.48 (b), Safety Information, requires that the facility be designed per recognized and generally accepted good engineering practices which includes ANSI/CGA G-21.1-2014.**

INTRODUCTION

I, Lorenzo Sena, a Compliance Inspector with the U.S. Environmental Protection Agency (EPA), Region VII, inspected Heartland Coop facility (Heartland Coop) in Henderson, Iowa on September 28, 2022. Heartland Coop was selected for an inspection because EPA region VII received a Citizen complaint with photos of a nurse tank releasing anhydrous ammonia.

I arranged for the inspection on September 26, 2022, with Mr. Chuck Yochum, the Heartland Coop - Henderson Location Manager.

I conducted the inspection to determine if the facility complies with Section 112(r) of the Clean Air Act (CAA), as amended in 1990. The inspection also included reporting provisions of the Emergency Planning and Community Right to Know Act (EPCRA) and the release reporting provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The inspection forms completed during the onsite inspection are included as **Appendix #1**.

EPA's regulations describing how these laws are to be implemented are found in the Code of Federal Regulations, Title 40, Part 68 (CAA), 355, 370, and 372 (EPCRA). The law and the implementing regulations 40 CFR 68, Chemical Accident Prevention Program (CAPP) require that the facilities must submit a complete Risk Management Plan (RMP) to the EPA for those regulated chemicals they possess in amounts above the applicable threshold quantities after June 21, 1999, and to implement the program described in the RMP.

A facility diagram, the locations where the photographs were taken and the photos taken during the inspection are included as **Appendix #2**.

HISTORY OF BUSINESS

According to Mr. Knop, the facility in Henderson, IA has been in operation since around 1950. The facility is located along the west side of the town of Henderson, IA (**see Appendix #2**). This facility receives, stores, and sells anhydrous ammonia to farmers in the local area. The facility has two bulk tanks, the north bulk tank (installed in 1981) which has a capacity of 18,000 gallons and the south bulk tank (installed 1964) which has a capacity of 12,000 gallons. In addition to the two bulk tanks and loading platform, the facility has a small office building, and 38 total nurse tanks, 12 of which are double nurse tanks (2 x 1,000 gallon) and have a capacity of 2,000 gallons and 26 of which have a capacity of 1,000 gallons. A worksheet detailing the capacity of the vessels onsite is included as **Appendix #3**.

According to the 2020 census, 144 (est.) individuals reside in the town of Henderson, IA. The most recent RMP (**See Appendix #4**) for Heartland Coop lists the facility as a Program 2 facility. Upon review of the facility documentation, operation and the applicability of Program eligibility in 40 CFR 68.10, I concur with the facility being Program 2. I proceeded to conduct this inspection as a Program 2 facility. In total, Heartland Coop Henderson has a total of 3 employees.

Maximum Intended Inventory (82% fill)	Amount of Anhydrous Ammonia in Pounds
Quantity Onsite at Time of Inspection	376,448
Quantity Listed in RMP	669,722
Maximum Daily Quantity per Tier II Forms	391,440

PERSONS INTERVIEWED AND INDIVIDUAL RESPONSIBILITIES

Chuck Yochum..... Henderson Location Manager, Heartland Coop
Nicholas Steinbach Director of Safety and Compliance, Heartland Coop
Mattea Contreras..... Safety and Compliance Specialist, Heartland Coop
Mark Knop.....Henderson Location Custom Applicator/ Operations, Heartland Coop

OPENING CONFERENCE

I arrived at the Heartland Coop Henderson facility on September 28, 2022, at 07:28 am, I was met by Messrs. Yochum, Steinbach, Knop and Ms. Contreras. I presented my credentials to the group and we each introduced ourselves and proceeded with the inspection.

I explained how the inspection would progress and discussed the inspection forms with the group. I explained that I would write a report of the inspection, turn it in to EPA Management and they would assign a Case Review Officer (CRO) who would be in contact with the facility regarding details of the inspection. I did inform them that he would receive a copy of my inspection report, and the photos taken during the inspection.

EPCRA TIER II

The facility RMP (**Appendix #4**), prior to the inspection listed a maximum capacity of 669,722 pounds of anhydrous ammonia on-site. During the inspection, I requested and was provided a copy of the most recent (2021) facility Tier II forms which were submitted to the Iowa Department of Natural Resources. The facility Tier II forms (**included as Appendix #5**) list a maximum of 391,440 pounds of ammonia in the largest container.

During the inspection, I asked the group how the amount of anhydrous ammonia reported on the Tier II forms was calculated as well as how they maintain an inventory detailing the current amount of anhydrous ammonia on-site. Mr. Steinbach provided me with a document which listed the maximum inventory of anhydrous ammonia at the facility including all bulk and nurse tanks as well as a document showing the current inventory, these documents are included as **Appendix #3**. According to the facility maximum inventory form dated December 2020. The maximum inventory for the facility has not changed and is based on each vessel and their capacities. According to these documents, the facility has a correct total anhydrous ammonia storage capacity of 386,629 pounds. Since the discrepancy between the actual facility maximum capacity

(386,629 lbs.) and the maximum quantity listed in the RMP (669,722 lbs.) is significantly different, I explained that changes needed to be made to the RMP to reflect the correct maximum capacity of the facility.

Following the inspection, I received an e-mail from Mr. Stienbach notifying me that the changes to the RMP had been made to the maximum quantity via EPA Central Data Exchange (CDX). This correspondence as well as all post-inspection correspondence and photos are included as **Appendix #6**.

Prior to the inspection, I reviewed the homepage for the Mills County Iowa Emergency management plan (<https://www.millscountyiowa.gov/202/Emergency-Operations-Plan>) and noted that the Heartland Coop facility is included in the plan.

HAZARD ASSESSMENT

During the inspection, I requested and was provided a site Hazard Assessment (**included as Appendix #7**). The Offsite Consequence Analysis (OCA) lists the largest vessel as 139,914 pounds and a worst-case scenario with a distance-to-endpoint (DTE) of 4.4 miles and an alternate-release scenario with a DTE of 0.3 miles. The DTE information was generated using RMP* Comp. The impacted populations were identified using LandView 6 (2000 census) and are listed as 791 individuals for the worst-case scenario and 95 for the alternative release scenario. I noted that the facility used urban terrain to determine the distance to endpoint.

Upon further review, I noted that the quantity released was incorrect and should be limited to the capacity of just the largest bulk tank (instead of combining the capacity of both bulk tanks) including any administrative controls (such as 85% fill). Since the capacity of the largest bulk tank is 18,000 gallons x 85% fill x 4.6638 pounds per gallon, the total amount that should have been used to calculate the worst-case distance to endpoint is 71,356 pounds of anhydrous ammonia. The quantity of anhydrous ammonia released in the alternate release scenario was correct and remained unchanged.

Using RMP* Comp, I found the distance to endpoint (DTE) the worst-case scenario (for the largest vessel onsite) and used MARPLOT to determine if and how the affected population would change for the worst-case scenarios. In addition, I used RMP*Comp to determine the alternative release scenario DTE and used MARPLOT to determine the affected population.

I included the RMP* Comp DTE and the Marplot population estimates for both the worst-case and alternate release scenarios which I prepared as **Appendix #8**.

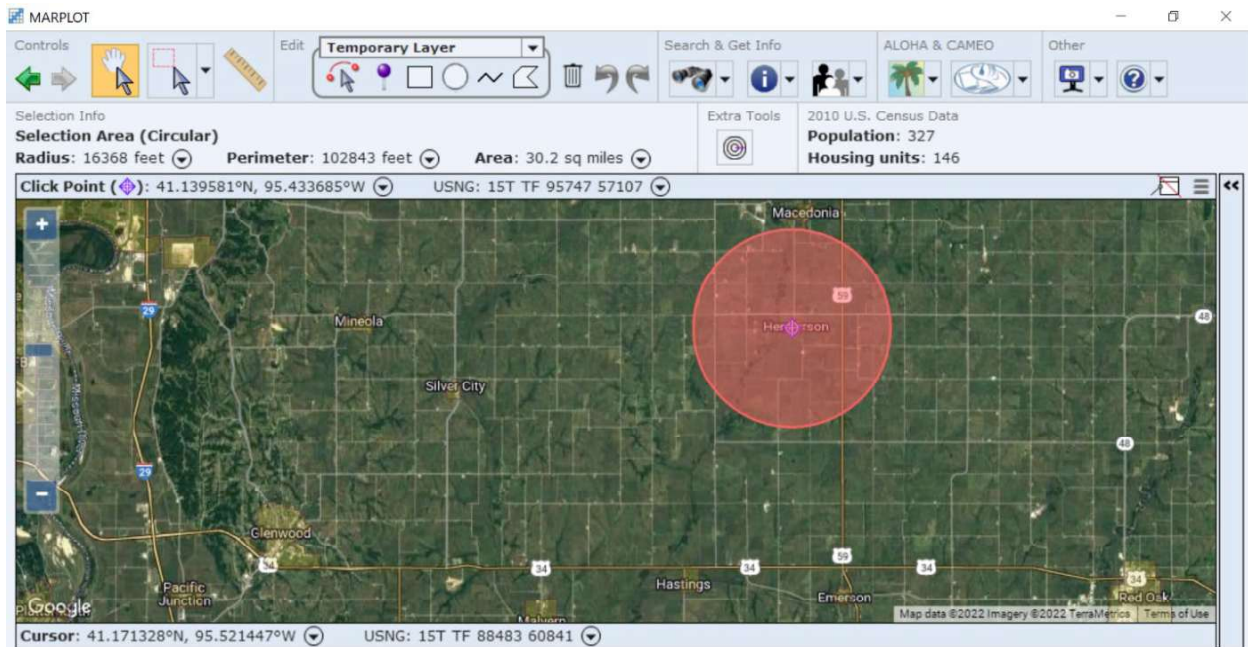
Worst-Case

The change in volume (to include only the largest vessel instead of the volume of both bulk tanks), decreased the distance to endpoint from 4.4 miles to 3.1 miles which also reduced the affected population for the worst- case scenario from 791 to 327 individuals.

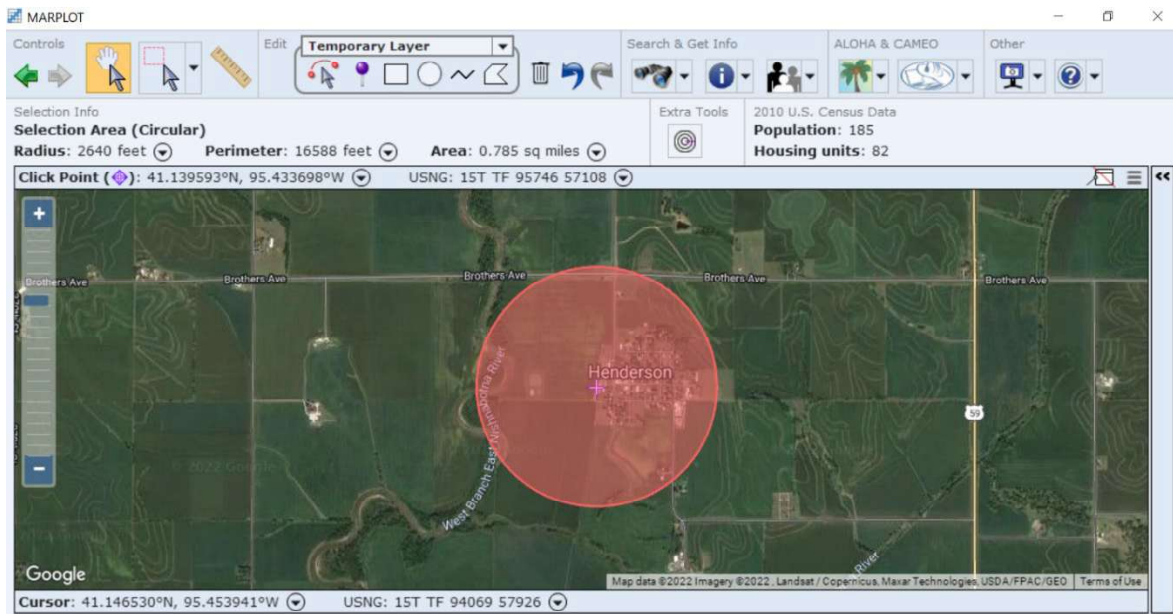
Alternative Release

Using the existing scenario described in the Hazard assessment of a 1” transfer hose rupture releasing 4,520 pounds over 2 minutes and urban terrain, I came up with a DTE of 0.5 miles resulting in an affected population of 185 individuals as opposed to 95.

Worst Case:



Alternate Release:



40 CFR 68.36(b) states the following: “If changes in processes, quantities stored or handled, or any other aspect of the stationary source might reasonably be expected to increase or **decrease**

the distance to the endpoint by a factor of two or more, the owner or operator shall complete a revised analysis within six months of the change and submit a revised risk management plan as provided in § 68.190.” Since this change decreases the affected population by a factor of 1.4 a change within 6 months is not required but I explained that the RMP should be corrected to provide more accurate information for emergency planners.

Upon review of the facility OCA, I also noted that the facility used LandView 6 to determine the population within the distance to endpoint. LandView 6 utilizes the census data from the 2000 census. I explained that both the worst-case and alternative release scenarios be updated to reflect the current (or most current census data) as required by 40 CFR 68.30(c) Defining offsite impacts – population, which states: “Data sources acceptable. The owner or operator may use the most recent Census data, or other updated information, to estimate the population potentially affected”.

Based on this observation, I identified the following preliminary finding:

- 1. The facility failed to ensure that the most recent census data or other updated information, to estimate the population potentially affected was used in the preparation of the facility hazard assessment as required by 40 CFR 68.30(c).**

Following the inspection, I received an e-mail from Mr. Steinbach notifying me that the changes had been made to the facility Hazard Assessment and explained that the RMP had been corrected as well. The original correspondence stating that the changes were made to the RMP as well as the Hazard Assessment are included as [Appendix #6](#). Mr. Steinbach said that he is awaiting a confirmation from the CDX portal that these changes have all been made and will submit the confirmation when he receives it.

SAFETY INFORMATION

Heartland Coop did have the current Safety Data Sheets (SDSs) for the anhydrous ammonia they purchase, they are included as [Appendix #9](#).

During this inspection, I asked the group if the facility had a copy of the latest industry code and standards document. Mr. Steinbach showed me a binder containing a copy of ANSI/ CGA G-21.1-2014.

During the inspection, I asked Mr. Steinbach if he had information with regards to the safe upper and lower temperatures, pressures, flows, and compositions established for their process, or established process equipment specifications. He provided a copy of the facility safety information, which is included as [Appendix #10](#). Additional safety information is included in the facility anhydrous ammonia operations SOP which is included as [Appendix #11](#). The safety information maintained by the facility appeared to meet the requirements listed in 40 CFR 68.48.

During the facility walk-through, I noted that the bulk ammonia tanks were not labeled as per ANSI/ CGA G-21.1-2014 section 6.6.2, which states: “Each container or group of containers shall be conspicuously marked with a hazard warning label complying with 29 CFR 1910.1200

[12].” The facility had NFPA 704 labels on-site and I explained that these would be sufficient since the employees have immediate access to the safety information and the employees are fully aware of the hazards posed by anhydrous ammonia. Following the inspection Mr. Steinbach provided me with photos of the bulk tanks with the affixed NFPA 704 label. These photos are included in [Appendix #6](#).

40 CFR 68.48(b) states: “The owner or operator shall ensure that the process is designed in compliance with recognized and generally accepted good engineering practices. Compliance with Federal or state regulations that address industry-specific safe design or with industry specific design codes and standards may be used to demonstrate compliance with this paragraph”.

Based on this observation, I identified the following preliminary finding:

- 2. The facility failed to ensure that the bulk tanks were labeled as required by ANSI/CGA G-21.1-2014 section 6.6.2. Per 40 CFR68.48(b). Safety Information, the facility should ensure compliance with recognized and generally accepted good engineering practices which includes CGA G-21.1-2014.**

Following the inspection, Mr. Steinbach provided me with photos the anhydrous ammonia bulk tanks with the proper NFPA 704 labels affixed ([see Appendix #6](#)).

HAZARD REVIEW

I asked the group if the facility had conducted a hazard review. Mr. Steinbach provided me with one dated July 11, 2019, it is included as [Appendix #12](#). I reviewed the copy of the hazard review, and it appears to meet the requirements listed in 40 CFR 68.50.

STANDARD OPERATING PROCEDURES (SOPs)

I asked the group for a copy of the most recent Standard Operating Procedures. I was provided with a copy of the facility SOPs; these operating procedures can be seen and are included as [Appendix #11](#). I reviewed the SOPS more closely after the inspection and noted that the SOPs Included consequences of deviation, were detailed, and addressed initial startup normal operating procedures, temporary operations, emergency shutdown, normal shutdown and startup following an emergency shutdown and appeared to meet the requirements listed in 40 CFR 68.52.

TRAINING

During the inspection, I asked the group for documentation pertaining to the training they perform on-site. Mr. Steinbach provided me with a sign-in sheet and checklist for the subjects covered and evaluated during the annual training ([See Appendix #13](#)). The training was a hands-on ammonia training with a written test and was conducted on September 29, 2021. The facility training procedures and frequency appear to meet the requirements listed in 40 CFR 68.54

MAINTENANCE

I asked Mr. Yochum about the facility maintenance program. He indicated that they run an annual rotation and perform whatever maintenance is needed on both the bulk and nurse tanks. I reviewed the written facility maintenance procedures and they appeared to be adequate. In addition to the procedures, I asked to see the maintenance records for the bulk tanks as well as a double nurse tank which I selected during the facility walk-through (#7039). The maintenance activities included maintaining the bulk tanks (and loadout), checking valves, checking for corrosion, and checking/ replacing the pressure relief valves. The nurse tanks receive the same treatment as the bulk tanks with the addition of servicing/ replacing the tires, axles, and onboard water tank. The records from the bulk anhydrous tanks appeared to be up to date with no overdue maintenance requirements. The maintenance record from the double nurse tank shows that side "A" required a pressure relief valve (PRV) change by 7/2021 and the change had not been made. I explained to Mr. Steinbach that the maintenance log for each nurse tank be gone through to make any replacements to PRVs that are overdue. Following the inspection, Mr. Steinbach informed me that a total of 10 PRVs on the nurse tanks were replaced ([see Appendix #6](#)).

ANSI/ CGA G-21.1-2014 section 5.8.16 states the following "No container PRD shall be used after the replacement date as specified by the manufacturer of the device. If no date is specified, a pressure relief valve shall be replaced no later than 5 years following the date of its manufacture or last repair."

40 CFR 68.56(a) states "The owner or operator shall prepare and implement procedures to maintain the on-going mechanical integrity of the process equipment. The owner or operator may use procedures or instructions provided by covered process equipment vendors or procedures in Federal or state regulations or industry codes as the basis for stationary source maintenance procedures".

During the facility walk-through, we discussed the adequacy of the protective barriers around the bulk tanks. There were bollards around the two bulk tanks which were constructed with a 4" plastic pipe filled with concrete and containing a single piece of rebar in the center. The bollards were set in concrete but many of them were cracked and sufficiently degraded to render them useless as a protective measure against impacts ([See Appendix #2, photos 1,9 and 12](#)). As mentioned in ANSI/ CGA G-21.1-2014 section 6.7.1 Protection of container and appurtenances: "Containers and appurtenances shall be located or protected by suitable barriers to avoid damage by trucks or other vehicles".

As can be seen in [Appendix #2, photos 10, 11 and 12](#), the facility had a problem with burrowing animals around the bulk tank footings. The burrows were 10 to 12 inches in diameter with varying depths, some were deep enough that one could not see the bottom of the burrow. Evidence of burrowing mammals was observed beneath both bulk tanks. I explained that I was concerned with the possibility of these rodents burrowing and undermining the footing. Mr. Knop explained that he was present when the footings were installed and they are at minimum, 6 feet below the surface of the ground. ANSI/ CGA G-21.1-2014 section 6.4.1 states the following: "Containers installed aboveground shall be provided with substantial reinforced concrete footings and foundations or structural steel supports mounted on reinforced concrete foundations. In either case, the reinforced concrete foundations or footings shall extend below the established

frost line and shall be of sufficient width and thickness to support the total weight of the containers and contents adequately.”. Since the depth of the rodent burrows is unknown, their effect on the stability of the ground under the footings is also unknown. Regardless, the facility must ensure that the stability of the ground under the footings is maintained to ensure that the footings evenly share the load of the bulk tank to prevent the concentration of excessive loads on any part of the tank, its supports or ground under the footings.

Based on these observations, I identified the following preliminary finding:

- 3. Pursuant to 40 CFR 68.56(a), Maintenance, the owner operator shall implement procedures to maintain the on-going mechanical integrity of the process equipment as per generally accepted good engineering practices which includes ANSI/CGA G-21.1-2014.**
 - a. The facility failed to ensure that the integrity of the bulk anhydrous ammonia storage tank supports, and footings is maintained as required by ANSI/ CGA G-21.1-2014 section 6.4.1.**
 - b. The facility failed to ensure that the barriers protecting the bulk anhydrous ammonia tanks was sufficient to prevent damage to the tanks from vehicle impact as required by ANSI/ CGA G-21.1-2014 section 6.7.1.b.**
 - c. The facility failed to ensure that the pressure relief valves are replaced on or before the change by date as required by ANSI/ CGA G-21.1-2014 section 5.8.16.**

During the facility walk-through, we discussed the adequacy of the pull away protection for the fill bulkhead. The facility had backflow check valves installed in the fill piping (see Appendix 2, Photo #9) but, the anchor to which it was attached was small diameter pipe anchored in concrete and appeared to be insufficient to prevent pull-away. I asked if the facility used shear fittings or breakaways. Mr. Stienbach said that the delivery truck they use for all deliveries utilizes threaded connectors which attach the hose directly to the bulkheads.

ANSI/ CGA G-21.1-2014 section 5.10.8.1 states the following: “These emergency shutoff valve(s) or backpressure check valves shall be protected from any possible pull-away-while connected incident between the mobile container and the transfer station. As a result, any break resulting from a pull will occur on the hose or swivel-type piping side of the connection while retaining intact the valves and piping on the plant side of the connection.

Protection from pull-away-while-connected incidents may be accomplished by:

Reinforced concrete or reinforced-concrete and structural steel bulkheads or equivalent anchorage-strong enough not to break and massive enough not to be uprooted by the motor vehicle:

Use of approved breakaway devices, specifically designed for this purpose: or

Use of shear fittings designed to conform to good engineering practices.”

40 CFR 68.48(b) states: “The owner or operator shall ensure that the process is designed in compliance with recognized and generally accepted good engineering practices. Compliance with Federal or state regulations that address industry-specific safe design or with industry-specific design codes and standards may be used to demonstrate compliance with this paragraph.”

Based on these observations, I identified the following preliminary finding:

- 4. The facility failed to ensure that the reinforcement for the fill bulkheads/ check valves was adequately designed to prevent pull-away-while connected incidents as required by ANSI/ CGA G-21.1-2014 section 5.10.8.1. 40 CFR 68.48 (b). Safety Information, requires that the facility be designed per generally accepted good engineering practices which includes CGA G-21.1-2014.**

Following the inspection, Mr. Steinbach provided me with photos of the following (**included as Appendix #6**):

1. Filling the rodent burrows beneath the bulk tanks
2. Placement of concrete barricades to protect the bulk tanks from vehicular impact
3. Nurse tank pressure relief valve replacements
4. Upgrades to reinforce the fill bulkhead to prevent pull-away-while connected accidents

COMPLIANCE AUDIT

I asked to see copies of the two most recent compliance audits performed by the facility, Mr. Steinbach provided me with copies of the two most recent compliance audits. I reviewed them both and kept a copy of the most recent one dated March 31, 2022 and included it in this report as **Appendix #14**. In addition, he also provided me with the last inspection conducted by Iowa Department of Agriculture and Land Stewardship (IDALS). This inspection was conducted on June 28, 2022 and is included as **Appendix #15**. The facility compliance audits appear to meet the requirements listed in 40 CFR 68.58.

INCIDENT INVESTIGATION AND OSHA 300 LOGS

During the inspection, I asked Mr. Steinbach if he maintained copies of any incident investigations or OSHA 300 logs. Mr. Steinbach replied that the facility has never had an accidental release of anhydrous ammonia.

EMERGENCY RESPONSE

Heartland Coop is a non-responding facility. In the event of an ammonia release, Mr. Yochum said they would assess the release and if necessary, evacuate the area then call 911. Mr. Yochum indicated that they do have a written emergency action plan which is included as **Appendix #16**.

Mr. Yochum stated that both he and Mr. Knop are volunteer firefighters for the town of Henderson, IA. He also mentioned that the Heartland Coop facility serves as the center of operations for the local volunteer fire department. The group was also aware that they were required to satisfy 40 CFR 68 requirements to document coordination activities with the local responders and I was provided the documentation which is included as **Appendix #17**.

As mentioned above in the EPCRA Tier II section in this report, the facility sends copies of the Tier II forms to the Mills County LEPC.

Prior to the inspection, I reviewed the homepage for the Mills County Iowa Emergency management plan (<https://www.millscountyiowa.gov/202/Emergency-Operations-Plan>) and noted that the Heartland Coop facility was included in the plan.

MANAGEMENT SYSTEM

I asked Mr. Steinbach if the facility had a management system (or organization chart) in place at the facility which lists the name of the person as well as their duties with regards to the RMP requirements. He provided me with a copy of the facility management system/ organization chart, and it is included as **Appendix #18**.

RISK MANAGEMENT PLAN

Heartland Coop submitted a Risk Management Plan (RMP) on March 4, 2019 and is due for re-submission on March 4, 2024. I reviewed the RMP, and it appeared to be complete but was in need of some corrections. The areas needing correction are listed below:

1. As mentioned in the EPCRA section of this report, the RMP (**Appendix #4**) lists a maximum intended inventory of 669,722 pounds. According to facility personnel and inventory documents (**Appendix #3**) provided by the facility, the maximum facility inventory is 386,629 pounds.
2. As mentioned in the Hazard Assessment section above, the facility did not use the capacity of the largest vessel (18,000-gallon tank) to complete the OCA but instead used the combined capacity of the bulk tanks as the volume used to calculate the worst-case distance to endpoint. 40 CFR68.25(b)(1) states “For substances in a vessel, the greatest amount held in a **single** vessel, taking into account administrative controls that limit the maximum quantity”.

As mentioned in the paragraphs above, these corrections to the facility RMP have been made by the facility shortly after the inspection via CDX. Correspondence from the facility detailing the changes made after the inspection are included as **Appendix #6**.

CLOSING CONFERENCE

I reviewed my observations and findings with the group. The group explained that the concerns I had raised during the inspection would be fixed as soon as possible and they would send me

documentation to show that each concern was addressed. As of October 25, 2022, all of the concerns I had during the inspection have been addressed and are included as **Appendix #6**.

Mr. Steinbach signed the Receipts for Samples and Documents, and the Confidentiality Notice which are included as **Appendix #1**. Mr. Steinbach elected not to claim any CBI for the inspection. Mr. Steinbach made copies and kept of each one of these forms. I departed the facility at 10:45 am on September 28, 2022.

**LORENZO
SENA**

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LORENZO SENA
Date: 2022.11.16 11:14:52
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Lorenzo Sena
Compliance Inspector

**DAVE
HENSLEY**

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Dave Hensley
Chemical Accident Prevention
Section Chief

APPENDICES

- 1 - Inspection Forms
- 2 - Facility Diagram and Photos
- 3 - Capacity Worksheet and Current Inventory
- 4 - Risk Management Plan
- 5 - Tier II Forms
- 6 - Post Inspection Correspondence from Heartland Coop
- 7 - Hazard Assessment
- 8 - Recalculated Worst-Case Scenario
- 9 - SDS Anhydrous Ammonia
- 10 - Safety Information
- 11 - Standard Operating Procedures
- 12 - Hazard Review
- 13 - Training Documentation
- 14 - Compliance Audit
- 15 - IDALS Inspection
- 16 - Facility Emergency Plan
- 17 - Documentation of ER Coordination
- 18 - Management System/ Organization Chart