



**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:

Company Name: Wilbur-Ellis Company, LLC
Facility Name: Wilbur-Ellis Company (Walla Walla, WA)
Physical Address: 599 C Street, Walla Walla Washington 99362
Phone Number: (509) 529-5381
Latitude/Longitude: 46.090351, -118.275179
RMP Facility ID#: 1000 0009 6004
FRS ID#: 110000728053
EJ Concerns: Yes (86%)

CONTACT INFORMATION (RMP Implementation):

Name: Trey Arkoosh
Phone Number: (208) 539-7703
E-mail: tarkoosh@wilburellis.com

EMERGENCY CONTACT INFORMATION:

Name: Trey Arkoosh
Phone (24-hr): (208) 539-7703
E-mail: tarkoosh@wilburellis.com
Website: <https://www.wilburellis.com/>

TRIP DETAILS:

Inspection Date: May 19, 2023
Inspection Time: 09:00 through 10:30
Inspectors: Edward Johannes, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Peter Phillips, US EPA Region 10 SEE Grantee, RMP Inspector
Terry Garcia, US EPA Region 10 SEE Grantee, RMP Inspector
Mhara Coffman, US EPA Region 10, RMP Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: June 8, 1999
Date of Latest Update: June 3, 2019

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)
1000099620	Farm Supplies Merchant Wholesalers	1000124830	42491	2	Ammonia (conc 20% or greater) (7664-41-7)	146,000
1000099620	Farm Supplies Merchant Wholesalers	1000124829	42491	2	Ammonia, Anhydrous (7664-41-7)	168,000
1000099623	Farm Supplies Merchant Wholesalers	1000124833	42491	2	Ammonia (conc 20% or greater) (7664-41-7)	458,160

PURPOSE:

The purpose of this inspection 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.

- The facility has been previously inspected in the past 5 years: No ☐ Yes ☒
If Yes, Date of Last Inspection: August 12, 2021 (Desk Audit)
- 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 ☐

If Yes, Permit Number

RELEASE/ACCIDENT HISTORY:

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

If Yes, Date and Description of the Release:

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

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: February 17, 2023

INSPECTION ENTRY:

The EPA Inspection Team (EPA) led by Mr. Edward Johannes arrived at the premises of Wilbur-Ellis Company (Walla Walla, WA) facility (facility) in Walla Walla, Washington, at 08:30 and was joined by the following facility personnel:

Name	Title
Trey Arkoosh	Location Ops Manager
Pam Simonson	EHSS Reg Manager
Connie LaTour	EHSS Reg Manager

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

If Yes, Name and Title of Representative:

The facility is a first responder: No ☒ Yes ☐

If No, Responding Agency

The inspection team was escorted to a conference room located in the facility's office building. Introductions were made by Edward Johannes, who provided a summary of the risk management program (RMP) and explained the purpose of the visit. Each team member presented his/her credentials.

EPA then requested an explanation of the facility's operations and any additional safety measures that should be taken during the site tour. Trey Arkoosh, Pam Simonson, and Connie LaTour gave a brief description of the facility, operations, and personal protective equipment required for the tour. They explained that the covered process had been physically deactivated, and that they no longer stored ammonia or produced aqueous ammonia at the facility. They stated that the facility's two ammonia storage tanks only had residual ammonia vapor present. Only high visibility vests were required and worn around the process area by EPA personnel.

Prior to the inspection, EPA sent a certified notice of inspection letter on May 4, 2023, 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. On May 15, 2023, in response to the notice of inspection, Mr. Arkoosh informed Mr. Johannes by phone that the facility no longer handled anhydrous and aqueous ammonia, had physically closed the RMP regulated process, and were in the process of sending a notice of deregistration. Mr. Johannes informed him that the inspection would still proceed.

The facility is unionized: No ☒ Yes ☐

If Yes, Name of Union

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

If Yes, Name/Title

GENERAL INFORMATION:

The facility was regulated under the Risk Management Program as a Program Level 2 facility and is owned and operated by Wilbur-Ellis Company, LLC (Wilbur-Ellis). Wilbur-Ellis was founded in 1921 as a small import-export brokerage trading company in San Francisco. The firm initially focused on trading fishmeal and fish oil. Currently Wilbur-Ellis is a global services leader in precision agriculture technology and products, and in-market expansion services in the animal feed and specialty chemicals industries. The primary purpose of the facility is the storage and distribution of various chemicals used in the agricultural industry including anhydrous ammonia and aqueous ammonia to farmers who use it as an agricultural fertilizer. There are 13 full-time employees on site.

The facility has two 18,000-gallon aboveground storage tanks (ASTs; bullet tanks) that can hold approximately 92,700 pounds (lbs) anhydrous ammonia each. Both ASTs were operated in tandem allowing the ammonia to be transferred from them to tanker trucks which deliver the ammonia to the local farmers to be used on their fields. The ASTs are located on the central-south side of the facility. Approximately 75% of the anhydrous ammonia stored in the two ASTs was also blended with water to produce aqueous ammonia in a converter. After conversion the aqueous ammonia (concentration 20%

or greater) is stored onsite in four storage tanks each with a capacity of approximately 20,000 gallons. Aqueous ammonia was transferred from these tanks to tanker trucks and delivered to the local farming community to be used on their fields.

The facility's RMP regulated process has been physically decommissioned and anhydrous ammonia is no longer stored at the facility, nor is aqueous ammonia produced or stored at the facility. A Risk Management Program De-Registration Form had been submitted on May 17, 2023, to the EPA RMP Reporting Center (Attachment B).

ON-SITE OBSERVATIONS:

The facility tour was conducted from approximately 09:00 to 10:00. The inspection team was escorted by Trey Arkoosh, Pam Simonson, and Connie LaTour. The inspection team observed the two 18,000-gallon ASTs, the convertor, the four aqueous ammonia storage tanks, emergency showers, and the area where EPCRA reportable chemicals are stored. The photographs that were taken at the facility are included in Attachment A to this report.

The tour began at the Tier II chemical storage area located on the east side near the facility's office building (Photo 1). The next area observed was the two bullet tanks, located in the south-central side of the facility (Photo 2). The pressure gauges of both bullet tanks were examined and found to indicate that they were empty (Photos 3 and 4). Piping from the bullet tanks to the tanker truck fill station had been capped and tagged out of service (Photos 5 and 6). The electrical panel near the convertor was locked and tagged (Photos 8 and 9). The four aqueous ammonia storage tanks were marked empty (Photos 11, 12, and 13). The access hatches of these tanks had most of their bolts removed (Photos 11 and 13). Safety equipment at this location include three emergency shower/eyewash stations (Photos 14, 15, and 16) and a windsock on nearby adjacent building (Photo 7). Additional empty tanks adjacent to the aqueous ammonia storage tanks were identified including a propane storage tank that is below the reporting threshold (Photos 10 and 17).

After touring the RMP-covered process areas at the facility, the inspection team returned to the conference room to request documentation regarding the deregistration of the RMP-covered process, facility chemicals list, and proof of 2022 Tier II submissions to the LEPC and the local Fire Department. Upon obtaining and reviewing the documents, EPA provided a debriefing to Mr. Trey Arkoosh, Ms. Pam Simonson, and Connie LaTour.

INFORMATION COLLECTED FROM FACILITY:

1. Risk Management Program De-Registration Form
2. Emails showing submission of the 2022 Tier II to the LEPC and local Fire Department
3. Chemical Inventory Order List 2022
4. Evacuation Plan for Wilbur-Ellis Plant Personnel

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

No areas of concern were identified during the inspection.

DOCUMENTS REQUESTED NOT INCLUDED IN REPORT:

During the inspection, no follow-up document requests were made requiring further review.

INSPECTION 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 Digitally signed by EDWARD
(Affiliate) JOHANNES (Affiliate)
Date: 2023.09.29 12:35:46 -07'00'

Inspector Signature

JAVIER MORALES Digitally signed by JAVIER
MORALES
Date: 2023.09.29 12:57:28 -07'00'

RMP Coordinator/Approval

ERIN WILLIAMS Digitally signed by ERIN WILLIAMS
Date: 2023.10.11 11:49:28 -07'00'

EPCRA Coordinator/Approval

MATTHEW Digitally signed by MATTHEW
QUARTERMAN QUARTERMAN
Date: 2023.10.13 15:39:27 -07'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: Wilbur-Ellis Company (Walla Walla, WA)

City, State: Walla Walla, Washington

Photographer: Peter Phillips

File Sequence	Date	Time	Description
Photo 1.JPG	5/19/2023	9:18 AM	Tier II chemicals storage area
Photo 2.JPG	5/19/2023	9:21 AM	Two empty anhydrous ammonia pressure tanks
Photo 3.JPG	5/19/2023	9:21 AM	Pressure gauge and data plate for tank 1
Photo 4.JPG	5/19/2023	9:21 AM	Pressure gauge and data plate for tank 2
Photo 5.JPG	5/19/2023	9:22 AM	Capped and tagged anhydrous ammonia piping
Photo 6.JPG	5/19/2023	9:22 AM	Capped and tagged anhydrous ammonia piping
Photo 7.JPG	5/19/2023	9:23 AM	Facility wind sock
Photo 8.JPG	5/19/2023	9:23 AM	Covered process electrical panel locked and tagged
Photo 9.JPG	5/19/2023	9:24 AM	Covered process electrical panel locked and tagged
Photo 10.JPG	5/19/2023	9:24 AM	Empty tier II chemical storage tank
Photo 11.JPG	5/19/2023	9:25 AM	First and second empty aqueous ammonia storage tanks
Photo 12.JPG	5/19/2023	9:26 AM	Three of four empty aqueous ammonia storage tanks
Photo 13.JPG	5/19/2023	9:27 AM	Fourth empty aqueous ammonia storage tank
Photo 14.JPG	5/19/2023	9:29 AM	Emergency shower (1 of 3)
Photo 15.JPG	5/19/2023	9:29 AM	Emergency shower (2 of 3)
Photo 16.JPG	5/19/2023	9:30 AM	Emergency shower (3 of 3)
Photo 17.JPG	5/19/2023	9:31 AM	Propane fuel tank