

Clean Air Act - Section 112(r) Risk Management Program and EPCRA 312 – Tier II Facility Desk Audit Report

FACILITY INFORMATION:

Name: CHS Inc. - Craigmont
Physical Address: 707 E. Hwy. 95 Craigmont, Idaho 83523
Phone Number: (800) 210-9324
Latitude/Longitude: 46.236864/-116.463085
EPA Facility ID# 1000 0007 0255

CONTACT INFORMATION (RMP Implementation):

Name: Dan Andersen, Director, Country Ops EHS
Phone Number: (800) 210-9324
E-mail: co.compliance@chs.com

EMERGENCY CONTACT INFORMATION:

Name: Don Schumacher, Facility Manager
Phone (24-hr): (208) 791-6228
E-mail: co.compliance@chs.com
Website: www.chsinc.com

AUDIT DETAILS:

Contact Date: August 18, 2022
Inspectors: Terry Garcia, US EPA Region 10 SEE Grantee, Lead RMP Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: June 21, 1999
Date of Latest Update: April 29, 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.)
1000097724	NH3 Farm	1000122534	42491	2	Ammonia, Anhydrous (7664-41-7)	470,000

PURPOSE:

The purpose of this document review 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, and compliance with Section 312 of the Emergency Planning and Community Right to Know Act (EPCRA) which requires the Tier II Chemical Inventory Reports to be submitted annually. EPA Region 10 RMP inspectors are conducting offsite compliance monitoring when warranted for the RMP facility.

- The facility has been previously inspected in the past 5 years: No ☒ Yes ☐
If Yes, Date of Last Inspection:
- Is the emergency contact information current? 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 their [Enter Year] Tier II report to the SERC?

No ☐Yes ☒*If Yes, Date the Tier II was submitted: 2/8/2022*

Did the facility submit a Tier II to the LEPC and local fire department?

No ☐Yes ☒*If Yes, Date the Tier II was submitted: 2/8/2022***GENERAL INFORMATION:**

The facility is regulated under the Risk Management Program as a Program Level 2 process and is owned and operated by CHS Inc. CHS Inc. Craigmont facility stores and distributes anhydrous ammonia in pressure vessels. Ammonia is transferred into the pressure vessel from either semi-transporters or tank railcars and then placed into application equipment or nurse tanks. The application equipment and/or nurse tanks are then transported to the farmer's fields where the anhydrous ammonia is injected into the soil. There are seven (7) full-time employees at this site.

INFORMATION REQUESTED FROM FACILITY:

1. **Hazard Review Analysis** – A copy of the last two Hazard Reviews with recommendations and tracking sheets.
2. **Compliance Audit** – A copy of the last two Compliance Audits with recommendations and tracking sheets.
3. **Training** – Training records for each process operator
 - a. **Initial Training Records:** Training in the overview of the process and in the operating procedures, emphasis on the specific safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks.
 - b. **Refresher Training Records:** Training of each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process.
 - c. **Training Documentation:** Records which contains the identity of the employee, the date of training, and the means used to verify that the employee understood the training.
 - d. Fill in **Facility Training Summary** sheet.
4. **Emergency Response** – A copy of emails, letters, or notes on meetings with LEPC and local responders including contact information (individual names, phone numbers, email addresses, organization name), dates, and coordination activities.
5. **Tier II Reporting** - Evidence of submission of a Tier II as described in 40 C.F.R. Part 370 to the State Emergency Response Commission ("SERC"), the Local Emergency Response Commission ("LEPC"), and the fire department with jurisdiction over the facility.

ANALYSIS OF DOCUMENTATION SUBMITTED:

1. **Hazard Review Analysis:** CHS Inc. provided their 2017 (dated 3/27/2017) and 2020 (dated 6/10/2019, revised 6/10/2020) Hazard Reviews for review. Both hazard reviews use the What If analysis methodology to identify hazards for the storage and handling of anhydrous ammonia. The 2017 review team included representatives from CHS Corporate and facility staff who reviewed the design, equipment specifications, and conducted a visual inspection of the regulated process areas. The 2020 Hazard Review was conducted 6/10/2020 and certified as complete on 6/23/2020 by facility representative, Nick Broemeling. The 2017 and 2020 Hazard Reviews show that all findings and recommendations were completed.

The hazard reviews are being performed at least every five years as required by 40 CFR, § 68.50.

2. **Compliance Audit:** CHS Inc. provided their 2017 (dated 3/27/2017) and 2022 (dated 3/15/2022) Compliance Audits for review. The audit completed in 2022 that was scheduled for 3/27/2020 was delayed due to the COVID pandemic according to CHS Inc. The 2017 Compliance Audit was certified by Ms. Blel, Ms. Kurbowski and Mr. Broemeling CHS representatives. The 2017 audit identified five (5) findings that were closed by October 2018. The 2022 Compliance Audit was certified by Ms. Blel and Mr. Broemeling, and was completed by June 13, 2022.
3. **Training:** CHS Inc. provided their initial and refresher training documents (Observation, Tests and Certificate of record) for the following six operators: Donald Schumacher, Caleb Whittaker, Shelby Wilson, Mike Nau, John Frei, and Sam Forsmann.
 - a. Initial Training Records: The facility provided initial training documents for all operators as required by 40 CFR § 68.54 (a).
 - b. Refresher Training Records: The facility provided refresher training documents for all operators as required by 40 CFR § 68.54(b).
 - c. Training Documentation: Ammonia awareness and Skills verification certification signed by each operator and supervisor was provided.
 - d. Facility Training Summary: CHS Inc. provided a complete training summary and documentation for all six operators for review.
4. **Emergency Response Coordination (Annually after 9/21/18):** CHS Inc. provided documentation email confirming coordination with the LEPC, and Fire department (FD) for review. Additionally, the facility provided the following:
 - A sign-in sheet from the Fire Department touring the facility on June 14, 2022.
 - A memo dated 5/2/2018 to the LEPC in 2018 to ensure they are aware of storage of ammonia at the facility.
 - A memo dated 12/13/2021 to the FD and LEPC giving more details about the storage of anhydrous ammonia and to emphasize that they are a “non-responding” facility.
 - A 40-page training document available to local fire departments that describes the properties and hazards of anhydrous ammonia, proper PPE to use when responding to an anhydrous ammonia release, the different types of vessels where anhydrous ammonia is stored (bulk tanks, nurse tanks, semi-trucks, railcars, etc.), and proper first aid response to administer if exposed to anhydrous ammonia. This training material was sent out in 2013, 2014, 2016, 2017, and 2018.

5. **Tier II Report:** Evidence of submission of a Tier II was submitted the State Emergency Response Commission (“SERC”), the Local Emergency Response Commission (“LEPC”), and the fire department with jurisdiction over the facility. A copy of the Tier II Report for 2021 was provided. In addition to submitting to the state SERC, hard copies were mailed to Craigmont Fire Department and the Lewis County LEPC (documentation of mailing was presented see addresses below).
- Craigmont Fire Department, 109 3D Avenue, Craigmont, Idaho 83523
 - Lewis County LEPC, 510 Oak St., Room 7, Nez Perce, ID 83543

AREAS OF CONCERNS:

1. CHS Inc. compliance audits were not conducted at least every three years to verify that the procedures and practices are adequate and are being followed as required [68.58(a)]. The 2022 compliance audit was completed five years after the 2017 audit.

The findings in this report will be discussed with the facility via telephone and email after certification of this report.

AUDIT REPORT CERTIFICATION:

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

Signature

Date

RMP Coordinator/Approval

Date

EPCRA Coordinator/Approval

Date

Land Enforcement Section Chief/Approval

Date