

**CLEAN AIR ACT (CAA) § 112(r)(7)
&
EMERGENCY PLANNING, COMMUNITY RIGHT-TO-KNOW ACT (EPCRA) § 312
INSPECTION REPORT**

Hardin Generating Station

Facility Name and Address: Hardin Generating Station Sugar Factory Rd Route 1, Box 1144A Hardin, Montana 59034 Contact/Telephone: Kyle McCormack (303) 607-5590 Mailing Address: 2575 Park Lane, Suite 200 Lafayette, Colorado 80026	Date of Inspection: 9/18/2024 RMP EPA ID #: 1000 0020 4487 • Program Level: 3 • Covered Substances: ○ Anhydrous Ammonia TRIFID #: 59034HRDNGSUGAR NAICS: 221112 # Employees at this location: 46
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INTRODUCTION

This report presents the observations of the CAA section 112(r)(7) and EPCRA section 312 inspection conducted by EPA Region 8. The purpose of this inspection was to determine compliance with the Risk Management Plan (RMP) requirements of CAA section 112(r)(7) and the Tier II reporting requirements of EPCRA section 312.

Hardin Generating Station (HGS) uses, handles, and/or stores more than the threshold quantity of Anhydrous Ammonia. Anhydrous Ammonia is regulated, as specified at 40 C.F.R. §§ 68.115 and 68.130.

CAA 112(r)(7) Program Elements Reviewed:

1. Applicability [68.10]
2. OCA/ACS [68.20 – 68.42]
3. Process safety information [68.65]
4. Process Hazard Analysis [68.67]
5. Operating procedures [68.69]
6. Training [68.71]
7. Mechanical integrity [68.73]
8. Management of Change [68.75]
9. Pre-startup safety review [68.77]

10. Compliance audits [68.79]
11. Incident investigation [68.81]
12. Employee participation [68.83]
13. Hot work permit [68.85]
14. Contractors [68.87]
15. Emergency Response [68.90 – 68.96]
16. Risk Management Plan [68.150 – 68.195]

Nature of Business:

HGS generates electrical power from coal.

OBSERVATIONS

CAA § 112(r)(7) (RMP):

The EPA noted 6 possible findings regarding HGS's implementation of their Risk Management Program. The findings, along with their associated requirements, are listed below:

1. Requirement found at Subpart D - Prevention Program – Process Safety Information [40 CFR 68.65(d)(2)]: The owner or operator shall document that equipment complies with recognized and generally accepted good engineering practices (RAGAGEP).

- *The pressure relief valves at the ammonia pressure vessel may not be located 7.25 feet above the vessel's platform. This platform is mounted above the vessel.*
- *HGS cites **ANSI/IIAR 2, Standard for Design of Safe Closed-Circuit Ammonia Refrigeration Systems** as one of the standards that HGS follows*
- *Section 15.5.1.4 of **ANSI/IIAR 2** requires that the valves discharge at least 7.25 feet above the platform*
- *Section 15.5.1.5 of **ANSI/IIAR 2** requires that the valves discharge upward so that they do not spray towards personnel on the platform*
- *Section 15.5.1.6 of **ANSI/IIAR 2** requires that the valves be provisioned so as to prevent rain and snow from entering the valves*
- *The EPA therefore recommends that the valves, and attendant piping, be modified, if necessary, so that the valves comply with Sections 15.5.1.4, 15.5.1.5, and 15.5.1.6 above.*

2. Requirement found at Subpart D - Prevention Program – Process Safety Information [40 CFR 68.65(d)(2)]: The owner or operator shall document that equipment complies with recognized and generally accepted good engineering practices (RAGAGEP).

- *Valves and 8 sections of ammonia piping are not labeled where ammonia is injected into*

the process exhaust stack. (This ammonia is injected to reduce nitrous oxide emissions.)

- *HGS cites ANSI/IIAR 2, Standard for Design of Safe Closed-Circuit Ammonia Refrigeration Systems as one of the standards that HGS follows*
- *Section 5.14.3 of ANSI/IIAR 2 requires that the valves be labeled*
- *Section 5.14.6 of ANSI/IIAR 2 requires that the piping be labeled with specific information.*

3. Requirement found at Subpart D - Prevention Program – Operating Procedures [40 CFR 68.69(a)(2)]: The Operating Procedures shall address the following:

- ☐ Consequences of deviations [68.69(a)(2)(i)]
- ☐ Steps required to correct or avoid deviation? [68.69(a)(2)(ii)].

- *HGS's Operating Procedures (OP's) do not address:*
 - *Consequences of deviations, or*
 - *Steps required to correct or avoid deviation.*

Note: HGS does document the above Consequences and Steps in their Process Hazard Analysis (PHA) and in their Emergency Action Plan (EAP).

4. Requirement found at Subpart D - Prevention Program – Operating Procedures [40 CFR 68.69(c)]: The owner or operator shall certify annually that the operating procedures are current and accurate and that procedures have been reviewed as often as necessary to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to stationary sources.

- *Before the EPA inspection of 9/18/2024, HGS was not certifying their operating procedures annually*
- *Instead, HGS was certifying their operating procedures biennially or triennially*
- *However, HGS has agreed to certify their operating procedures annually, or more often if necessary.*

5. Requirement found at Subpart D - Prevention Program – Mechanical Integrity [40 CFR 68.73(d)(2)]: The owner or operator shall follow recognized and generally accepted good engineering practices (RAGAGEP) for inspections and testing procedures.

- *HGS has not performed internal inspections of their ammonia pressure vessel*
- *HGS's 2024 Process Hazard Analysis recommended that HGS consult the American Petroleum Institute (API) standards regarding performing such inspections*
- *It should also be noted that the EPA made a similar recommendation to another Power Generating Plant in Region 8. That Plant subsequently performed an internal inspection and found that their ammonia pressure vessel was full of oil.*
- *The EPA therefore recommends that HGS schedule internal inspections of their*

ammonia pressure vessel per the API 510, Pressure Vessel Inspection Code.

6. Requirement found at Subpart D - Prevention Program – Management of Change [40 CFR 68.75(b)(4)]: The Management of Change (MOC) procedures shall address the “Necessary time period for the change”.

- *HGS’s MOC procedures DO address the “Necessary time period for the change”*
- *However, HGS’s MOC forms, which are filled out before a change is implemented, DO NOT*
- *The EPA therefore recommends that HGS edit the MOC forms so that the forms document the “Necessary time period for the change”.*

EPCRA § 312:

Nothing of note from observations.

INSPECTION REPORT REVIEW RECORD		
		<i>Date:</i>
<i>Author:</i>	<i>Toxics and Pesticides Enforcement Section Inspector</i>	<i>10/1/2024</i>
<i>Final Reviewer:</i>	<i>Section Supervisor</i>	<i>10/15/2024</i>