REGION 10
SEATTLE, WA 98101

Clean Air Act - Risk Management Program – Section 112(r)
Emergency Planning Community Right-to-Know Act – Sections 302, 311 and 312
On-site Compliance Inspection Report
Airgas Tualatin

PURPOSE

The purpose of this On-site Compliance Inspection was to determine compliance with the Clean Air Act Section 112(r) Risk Management Program and the Emergency Planning and Community Right to Know Act Sections 302, 311, and 312.

CAA Section 112(r) requires facilities that hold chemicals over threshold quantities to have a Risk Management Program. EPCRA Section 311 requires facilities that hold chemicals above the reporting threshold to submit copies of the SDSs or a list of these chemicals to the State Emergency Response Commission, the Local Emergency Planning Committee, and the local fire department. EPCRA Section 312 requires the Annual Chemical Inventory Reports (Tier II) for the current calendar year to be submitted by March 1 of the following year. The Tier II is required to be submitted to the SERC, LEPC, and fire department. EPCRA Section 302 requires any facility that has any EHS above the threshold planning quantities to notify the SERC and LEPC. LEPCs should also include the EHS(s) in their emergency response plans. Facilities covered under EPCRA Section 312 are required to indicate on the Tier II if they are subject to EPCRA Section 302 emergency planning requirements.

COMPANY INFORMATION

Name:	Airgas USA, LLC
Mailing Address:	3737 Worsham Avenue Longbranch, California 90808
Website:	www.airgas.com

FACILITY INFORMATION

Facility Name:	Airgas Tualatin
Facility Address:	20001 Teton Ave Tualatin, Oregon 97062
Latitude/Longitude:	45.2230, -122.4700
RMP Facility ID#:	1000 0024 1963
EPCRA Tier II ID#:	16327
FRS ID#:	110004790977
EJ Concerns:	Yes (98%)

CONTACT INFORMATION (RMP Implementation)

Name:	Shane Clark
Title:	Facility Manager
Phone Number:	503-692-2760
E-mail:	shane.clark@airgas.com

EMERGENCY CONTACT INFORMATION

Name:	Shane Clark
Title:	Facility Manager
Phone Number:	503-692-2760
E-mail:	shane.clark@airgas.com

INSPECTION DETAILS

Inspection Date:	March 12, 2024
Inspection Time:	09:00 a.m. – 12:08 p.m.
Inspectors:	Edward Johannes, US EPA R10, SEE Grantee, Lead RMP/EPCRA Inspector
	Mhara Coffman, US EPA R10, RMP/EPCRA Inspector
	Terry Garcia, US EPA R10, SEE Grantee, RMP/EPCRA Inspector
	Peter Phillips, US EPA R10, SEE Grantee, RMP/EPCRA Inspector
	Tom Vroman, Weston Solutions, Inc., EPA START Contractor

On February 29, 2024, EPA emailed a Notice of Inspection Letter to the facility informing them of a planned RMP and EPCRA inspection. The letter included 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. A copy of the letter must be provided to the employee representatives and the letter posted in a manner accessible to employees in the facility.

- Is the facility unionized? Yes ☐ No ☒
  If yes, the name of the union:
- Was an employee representative present during the inspection? Yes ☐ No ☒
  If yes, name/title:

GENERAL INFORMATION

The facility is regulated under the Risk Management Program as a Program Level 3 facility and is owned and operated by Airgas USA, LLC. There are twelve full-time employees on site.

The Airgas Tualatin facility receives spent compressed gas cylinders and refills empty cylinders with new compressed gas products for retail sale and distribution. The facility manufactures acetylene gas on-site to fill compressed gas cylinders. Acetylene gas generation is an RMP-covered process at the facility. An on-site acetylene generator combines calcium carbide and water to produce acetylene gas, which is then pumped into compressed gas cylinders on site. The facility also manages EPCRA-regulated chemicals on site.

DATE AND PROGRAM LEVELS OF SUBMITTED RMP

Initial Submission Date: May 20, 2019
Date of Latest Update: May 20, 2019

- Has the facility been inspected in the past 5 years? Yes ☐ No ☒
  If yes, date of last inspection:
- Is the facility High Risk? Yes ☐ No ☒

Process (as reported in the RMP)

Process ID	Description	Process Chemical ID	NAICS Code	Program Level	Chemical Name CAS Number	Quantity (lbs.)
1000098978	Acetylene Storage	1000124048	32512	3	Acetylene (74-86-2)	25,000

CAA TITLE V AIR PERMIT

- Does the facility have a CAA Title V Permit? Yes ☐ No☒
  If yes, permit number:

EMERGENCY RELEASE / ACCIDENT HISTORY

- Did an RPM reportable release occur in the past 5 years? Yes ☐ No ☒
- Did a CERCA/EPCRA reportable release occur in the past 5 years? Yes ☐ No ☒
  If either yes, the date and description of release:

EPCRA 312 – TIER II REPORT

- Was the 2023 Tier II report submitted to the SERC? Yes ☒ No ☐
  If yes, the date Tier II was submitted: February 23, 2024
  If no, the calendar year of the most recent Tier II:

- Was the 2023 Tier II submitted to the LEPC/fire department? Yes ☒ No ☐
  If yes, the date Tier II was submitted:

- Is the facility subject to EPCRA Section 302? Yes ☐ No ☒
  If yes, is it correctly checked on the Tier II? Yes ☐ No ☐

- Is the subject to RMP correctly checked on the Tier II? Yes ☒ No ☐
- Is the RMP facility ID correct on the Tier II? Yes ☐ No ☒

EPCRA CHEMICALS OVER THRESHOLD

According to the most recent Tier II, the facility stores the following hazardous chemicals over the reporting threshold except for those designated with an asterik. See the attached Tier II, Attachment C, for inventory amounts.

Chemical Name	EHS (Yes or No)	CAS Number
Acetone	No	67-64-1
Acetylene	No	74-86-2
Calcium carbide	No	75-20-7
Calcium hydroxide	No	1305-62-0
Nitrogen	No	7727-37-9
Propane*	No	74-98-6

EPCRA 311 – SDSs

See Attachment B for SDSs and chemical information on each hazardous chemicals stored over the reporting threshold at the Facility.

EPCRA 302 – LEPC Coordination

The facility does not store any EHS on-site over the TPQ and is not subject to EPCRA Section 302.

LEPC

Agency:	Washington County Emergency Management
Program Contact:	Chad Oyler
Title:	Chair
Address:	1400 Southwest Walnut Street, Suite 241, MS 30 Hillsboro, Oregon 97123
Phone Number:	(503) 846-7575
Email:	washco_em@washingtoncountyor.gov
Website:	https://www.washingtoncountyor.gov/emergency

INSPECTION ENTRY

Edward Johannes led the inspection entry. The inspection team met with Facility Manager, Shane Clark, Airgas Tualatin facility in Tualatin, Oregon. The team arrived at the facility at 9:00 a.m. and was joined by the following facility personnel:

Name	Title
Shane Clark	Facility Manager
Jacob Williams	EHS Specialist
Greg Jones	Assistant Manager
Joseph Wieland	EM
Brya McKenna	Tualatin Manager
Alex McGladry	DFM
Bret Ford	EHS Specialist
John Fredericks	Director of Safety & Compliance
Cory Charlson	ARGA Operations Manager

- Were any SERC, LEPC, or fire department representatives present? Yes ☐ No ☒
  If yes, names and titles of representatives:

- Is the facility a first responder? Yes ☐ No ☒
  If no, responding agency: Tualatin Fire Team 9

The inspection team was escorted to a conference room. Introductions were made by Edward Johannes, who provided a summary of the risk management program and explained the purpose of the visit. Each team member presented their credentials.

EPA requested an explanation of the facility's operations and any additional safety measures that should be taken during the site tour. The facility is a commercial distributor of compressed gases. The EPA was instructed that the required PPE included safety glasses and closed-toe shoes.

FACILITY TOUR / ON-SITE OBSERVATIONS

The facility tour was conducted from approximately 09:45 a.m. hours to 12:08 p.m. The EPA inspection team (EPA) was escorted by Shane Clark. The inspection team observed the exterior and interior areas of the facility including the Exterior Empty Tank Storage Area, Decanting Tanks, Acetone Storage, Calcium Carbide Room interior, Acetylene Room, Electrical Room, Fill Room, the Requalify Room, and the Break Room. The photographs are found in Attachment A of this report.

EPA observed the facility's secured exterior yard which serves as a staging area for compressed gas cylinders. Cylinders are separated according to product and managed in areas designated as the Empty Tank, Calcium Carbide, and Flammable Storage Areas (Photos 1 to 8).

The facility manages propane at the west exterior yard in two tanks. The first tank holds 2,000 gallons of propane, and the second tank holds 1,000 gallons (Photo 9). The propane tank fill system includes an associated gas shut-off valve (Photo 10). Safety features observed in the exterior yard include a fire extinguisher (Photo 1), wind socks (Photos 3, 7, and 11), security cameras (Photo 6), and a spill kit (Photo 8).

The facility's exterior yard also includes above-ground tanks storing hydroxide slurry (Photos 12 and 17), and acetone stored in a tote (Photo 13). A spill kit was observed adjacent to the acetone tote (Photo 14).

EPA observed signage stating that the Carbide Room allows only intrinsically safe electronics (Photo 15).

The inspection team toured the acetylene generation and tank filling operations located at the facility interior areas including the Acetylene Generation Room, Electrical Room, and the Fill Room. The facility produces acetylene in the Acetylene Generation Room. Safety mechanisms in the generation process include a ceiling-mounted acetylene gas detector (Photo 16), ventilation safety piping (Photo 18), and audio alarms mounted at the exterior of the adjacent Electrical Room Building (Photo 19). An acetylene gas monitoring system is located in the Electrical Room and visually displays real-time air data as monitored in the generation process (Photo 20). The monitoring system provides a visual alarm at 10% of the lower explosive limit (LEL), an audio alarm at 20% LEL, and activates the ventilation system in the

Generation Room within 50% of the LEL. EPA observed inspection records for the acetylene monitoring system as current and due for inspection in March 2025 (Photo 21).

The facility fills acetylene tanks with new product in the Fill Room which includes a ceiling-mounted acetylene monitor (Photos 22 and 23).

EPA observed the Requalifying Room where the facility's requalifying process is used to inspect tanks and determine their quality for reuse. The facility segregates cylinders deemed unsuitable for reuse and stages them in an area at the Fill Room exterior designated as the Tank Reclamation Area (Photo 24), where they are prepared for decommissioning and recycling. The facility maintains tank inspection logs for tanks identified for reuse (Photo 25). The facility stores Safety Data Sheets (SDS) in the Break Room (Photo 26).

After touring the RMP-covered process areas and the EPCRA chemical storage areas, the inspection team returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to Shane Clark.

INFORMATION COLLECTED FROM FACILITY

1. Facility Map
2. 2012 Process Hazard Analysis (partial)
3. Operators Training Form

AREAS OF CONCERNS

1. **Contractors [68.87]**: Airgas has not periodically evaluated the performance of the contractor owner or operator and contract employees in the covered process area. [68.87(b)(5)]. The contractors are Christianson Electrical, Setere & Sons, Ltd (Oregon Transport Company), and Boshart Trucking, Inc.

FOLLOW-UP DOCUMENTS REQUESTED

The following documents were unable to be located during the inspection by the facility representatives. The documents were requested to be sent to EPA by March 26, 2024. When received these documents were reviewed to determine compliance with Section 112(r) of the Clean Air Act.

1. 2017 PHA
2. 2019 PHA
3. Date EHS Exceeded TPQ
4. Dates Paxair and Liquide Air started operating the facility

ON-SITE INSPECTION REPORT CERTIFICATION

This is to certify that I, Edward Johannes, as the lead inspector for the On-site Compliance Inspection and that I have verified the accuracy of the information in this report.

EDWARD JOHANNES (Affiliate)

Digitally signed by EDWARD JOHANNES (Affiliate)
Date: 2024.07.18 12:44:36 -07'00'

Inspector Signature

JAVIER MORALES

Digitally signed by JAVIER MORALES
Date: 2024.07.18 15:10:40 -07'00'

RMP Coordinator Signature

ERIN WILLIAMS

Digitally signed by ERIN WILLIAMS
Date: 2024.07.26 10:54:29 -07'00'

EPCRA Coordinator Signature

MATTHEW QUARTERMAN

Digitally signed by MATTHEW QUARTERMAN
Date: 2024.07.26 12:38:43 -07'00'

Land Enforcement Section Chief Signature

ATTACHMENTS

A. Photo Log and Photographs
B. Safety Data Sheets (SDS)
C. Tier II
D. Google Earth Image
E. Property Boundary

ATTACHMENT A

Photo Log and Photographs

Attachment A – Photo Log

Site Name: Airgas Tualatin
City, State: Tualatin, Oregon
Photographer: Thomas Vroman

File	Photo Layout ID	Date	Time	Description
Photo1.jpg	1	3/12/2024	9:49 AM	Fire Extinguisher with rain cover Location: Empty Tank Storage Area
Photo2.jpg	2	3/12/2024	9:49 AM	Overview of empty tanks Location: Empty Tank Storage Area
Photo3.jpg	3	3/12/2024	9:49 AM	Fire Extinguisher rain cover and windsock Location: Empty Tank Storage Area
Photo4.jpg	4	3/12/2024	9:49 AM	Calcium Carbide Storage Area; near Flammable Storage Area North Location: Empty tank storage
Photo5.jpg	5	3/12/2024	9:50 AM	Calcium Carbide Storage Location: Facility Exterior
Photo6.jpg	6	3/12/2024	9:50 AM	Security cameras positioned at perimeter of facility Location: Facility Exterior, Flammable Storage Northwest
Photo7.jpg	7	3/12/2024	9:52 AM	Second wind sock Location: Facility Exterior, Flammable Storage, Northwest
Photo8.jpg	8	3/12/2024	9:52 AM	Spill kit near tank storage Location: Facility Exterior, Flammable Storage West
Photo9.jpg	9	3/12/2024	9:53 AM	Propane storage in 2000-gallon tank and 1000-gallon storage tank of propane stored behind wall Location: Facility Exterior, Flammable Storage West
Photo10.jpg	10	3/12/2024	9:54 AM	Gas shutoff valve Location: Facility Exterior, Flammable Storage West
Photo11.jpg	11	3/12/2024	9:54 AM	Windsock Location: Facility Exterior, Flammable Storage West
Photo12.jpg	12	3/12/2024	9:54 AM	Above-ground storage tanks for calcium hydroxide slurry Location: Facility Exterior, Decanting Tanks
Photo13.jpg	13	3/12/2024	9:56 AM	Acetone storage; entrance to Carbide Room Location: Facility Exterior
Photo14.jpg	14	3/12/2024	9:57 AM	Spill kit and signage at Carbide Room entrance Location: Facility Exterior
Photo15.jpg	15	3/12/2024	9:57 AM	Entrance to Carbide Room Location: Entrance to Carbide Room
Photo16.jpg	16	3/12/2024	9:58 AM	Entrance to Acetylene Generation Room, blue gas detector near ceiling of room Location: Acetylene Room
Photo17.jpg	17	3/12/2024	10:05 AM	Calcium hydroxide slurry exit pipe Location: Facility Exterior, Decanting Tanks
Photo18.jpg	18	3/12/2024	10:07 AM	Acetylene Generation Room “Safety Pipes” Location: Acetylene Room exterior
Photo19.jpg	19	3/12/2024	10:08 AM	Audio alarms mounted at Electrical Room exterior Location: Electrical Room exterior
Photo20.jpg	20	3/12/2024	10:09 AM	Acetylene gas monitoring system with visual readouts and alarm control board Location: Electrical Room
Photo21.jpg	21	3/12/2024	10:11 AM	Inspection records for electrical alarm systems; expires 3/2025 Location: Electrical Room
Photo22.jpg	22	3/12/2024	10:12 AM	Empty cylinders and tanks staged prior to filling Location: Fill Room
Photo23.jpg	23	3/12/2024	10:12 AM	Acetylene tanks to be filled; blue acetylene gas monitor can be seen above tanks Location: Fill Room
Photo24.jpg	24	3/12/2024	10:33 AM	Tank Reclamation Area, contents of tanks not to specifications are recycled here Location: Fill Room exterior
Photo25.jpg	25	3/12/2024	10:33 AM	Tank Inspection Logs Location: Requalify Room
Photo26.jpg	26	3/12/2024	10:33 AM	Safety Data Sheets binder Location: Break Room