

United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report

Simplot Grower Solutions

Mayfield, Kentucky

July 26, 2022

1.0 Introduction

The U.S. Environmental Protection Agency's efforts to reduce the likelihood and severity of chemical accidents includes planning and legislative initiatives such as the National Contingency Plan, the Emergency Planning and Community Right-to-Know Act (EPCRA), and the Accidental Release Prevention requirements under Section 112(r) of the Clean Air Act (CAA), as amended in 1990. This report outlines an inspection of the Risk Management Program (RMP) as mandated by Section 112(r)(7) of the CAA.

The focus of this inspection was to assess the RMP for a fertilizer distribution process at the Simplot Grower Solutions (Simplot) facility located in Mayfield, Graves County, Kentucky. This facility was selected for inspection because it has never been inspected under the RMP. The inspection, which was conducted on July 26, 2022, consisted of a discussion of and request for program documentation, as well as a site review of various aspects of facility operations. Personnel from the facility participated throughout the inspection. Documents were provided for review. This report will provide a background of the facility and a listing of observations.

2.0 Background

The Simplot facility is located in Mayfield, Kentucky. This facility stores and distributes anhydrous ammonia to end users. The facility was previously owned by two different companies and has been in use since 2012. The facility was purchased by Simplot in January of 2020. Simplot inherited seven (7) 30,000-gallon anhydrous ammonia tanks. The process is regulated as program level 2. According to facility records, the facility has the capacity for a maximum of 1,400,000 pounds of anhydrous ammonia on site; however, the tanks are only filled to 80% at any time. Facility representatives stated the facility hasn't had power since December 2021 when a tornado hit the town of Mayfield. The ammonia tanks were not damaged, but Simplot had the tanks inspected to be safe. Simplot decided to shut down the Mayfield site in early 2022 and sold all of the remaining anhydrous ammonia. There is currently no or a minimal amount of ammonia in any of the seven tanks. Additionally, there are no functioning nurse tanks at the facility. Simplot ultimately deregistered the facility on August 17, 2022. The ammonia process at the facility was subject to the RMP requirements of 40 C.F.R. Part 68 and EPCRA Section 302. The background specifics are summarized as follows in Table 1.

TABLE 1: Inspection Information Summary

Inspection Team

Lead Inspector: Jordan Noles, EPA
Inspector-In-Training: Chetan Gala, EPA
Date of Facility Visit: July 26, 2022

Facility Identification

Name: Simplot Grower Solutions - Mayfield
Street Address: 521 South 16th Street
City: Mayfield County: Graves State: Kentucky Zip: 42066
EPA Facility ID No: 1000 0016 2441
Dun & Bradstreet (D&B) No: N/A
Latitude: 36.736309
Longitude: -088.651996

Name, address and phone of corporate parent company:

Owner/Operator: Simplot Ab Retail Inc
Mailing Address: 1099 W Front St.
City: Boise State: Idaho Zip: 83702
Phone: (970) 506-8000

Name, title, and email of person responsible for 40 C.F.R. Part 68 implementation:

Name: Barry Newsome
Title: Location Manager
Email: Barry.Newsome@Simplot.com

Name and title of emergency contact:

Name: Bob Williams
Title: Location Office Coordinator
Day phone: (270) 247-8643
24-hour Phone: (270) 349-0052
Email: Bob.Williams@Simplot.com

Name and titles of stationary source personnel involved in site inspection (*accompanied site tours, provided documents and explanations*):

Name: Anthony Rossi
Title: EHS Manager
Phone: (208) 780-0658
Email: Anthony.Rossi@Simplot.com

Name: Barry Newsome
Title: Location Manager
Phone: (986) 200-2644
Email: Barry.Newsomes@Simplot.com

Name: Lee Simmons
Title: Regional Operations Manager
Phone: (731) 414-4994
Email: Lee.Simmons@Simplot.com

Note: This is not a union facility.

Date and Program Levels of Submitted Risk Management Plan

Date of initial submission: September 29, 1999 (as Graves County Coop)
Date of most recent submission: June 04, 2019
Deregistered: August 17, 2022
Process as reported in RMP: Ammonia Storage and Transfer
Process: Fertilizer distribution
Process ID: 1000104730
Program Level as reported in RMP: 2
NAICS code: 42491 (Farm Supplies Merchant Wholesalers)

3.0 Observations

The inspection of the Simplot facility evaluated various sections of the RMP regulations (40 C.F.R. Part 68, Program Level 2) and the inspection checklist included in “Guidance for Conducting Risk Management Programs Inspections under Clean Air Act Section 112(r).” The inspection began with an opening discussion of facility operations. EPA inspectors requested paperwork associated with the facility’s Risk Management Plan (RMPlan). The documents were reviewed by EPA inspectors on-site and later off-site. The discussion was followed by a tour of the facility’s anhydrous ammonia tanks and associated piping. An inspection out-brief was conducted where EPA inspectors described their observations. Observations from the RMP inspection at the Simplot’s facility are discussed below:

1. 40 C.F.R. § 68.50(c) requires the owner or operator to document the results of the Hazard Review and ensure that problems identified are resolved in a timely manner.
 - At the time of the inspection, facility representatives could not produce the action items derived from the 2019 Hazard Review, which was completed by the previous owner. The facility did send an “Ammonia Action Log” after the inspection. This document did have some of the action items identified in the

2019 Hazard Review, but not all of them. In addition, there were no estimated completion dates listed in the column labelled as such. The action items on this document did have a column labelled "Completion Date;" these dates were filled out as completed.

2. 40 C.F.R. § 68.93(a) requires coordination with local emergency planning and response organizations to occur at least annually, and more frequently, if necessary, to address changes: at the stationary source; in the stationary source's emergency response and/or emergency action plan; and/or in the community emergency response plan.
 - Facility representatives did produce a letter to the Fire Department dated July 23, 2021, in an attempt to coordinate the emergency action plan. This was the only letter the facility could provide, so there is no way for the inspection team to be sure there was coordination in 2020, when Simplot purchased the facility.

Inspection Report,

Prepared by:

JORDAN NOLES Digitally signed by JORDAN NOLES
Date: 2022.09.16 10:39:06 -04'00'

Jordan Noles, Inspector
North Air Enforcement Section
U.S. EPA Region 4

Approved by:

JASON DRESSLER Digitally signed by JASON DRESSLER
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Jason Dressler, Section Chief
North Air Enforcement Section
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