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

FACILITY INFORMATION:

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
EPA Facility ID# 1000 0009 6004

CONTACT INFORMATION (RMP Implementation):

Name: Rachel Turner
Phone Number: (509) 529-5381
E-mail: rdturner@wilburellis.com

EMERGENCY CONTACT INFORMATION:

Name: Rachel Turner
Phone (24-hr): (509) 386-5605
E-mail: rdturner@wilburellis.com
Website: http://ag.wilburellis.com/Locations/Pages/WallaWall

AUDIT DETAILS:

Contact Date: August 12, 2021
Inspectors: Bob Hales, US EPA Region 10 SEE Grantee, RMP Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: June 21, 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, Aqueous (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, Aqueous (7664-41-7)	458,160

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 will not be conducting onsite inspections due to the COVID-19 pandemic requiring restricted travel and social distancing by the Centers for Disease Control (CDC) to prevent the spread of COVID-19. EPA Region 10 will coordinate with the RMP

facility to schedule an onsite inspection when the CDC has determined it is safe.

- The facility has been previously inspected in the past 5 years: No ☐ Yes ☒
  If Yes, Date of Last Inspection: August 5, 2016
- 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 ☐
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 their 20202020 Tier II report to the SERC? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: February 26, 2021
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 26, 2021

GENERAL INFORMATION:
The facility is registered under the Risk Management Program as a Program Level 2 process and is owned and operated by Wilbur-Ellis Company. The primary purpose of the facility is the storage and distribution of anhydrous ammonia and aqua ammonia to farmers as an agricultural fertilizer. The primary purpose of the facility is the storage and distribution of anhydrous ammonia and aqueous ammonia to farmers as an agricultural fertilizer. Two anhydrous ammonia storage tanks with a capacity of approximately 18,000 gallons each are operated in tandem. Ammonia is transferred from the storage tanks to tender trucks and delivered to the local farming community as fertilizer. Approximately 75% of the anhydrous ammonia stored onsite is used in a blending process for the production of aqueous ammonia in a converter. Four aqueous ammonia (conc 20% or greater) storage tanks each with a capacity of approximately 20,000 gallons are located onsite. Aqueous ammonia is transferred to delivery trucks and delivered to the local farming community as fertilizer. There are 13 full-time employees on site.

INFORMATION REQUESTED FROM FACILITY:

1. Process Hazard Analysis – last two updates/revalidations.
2. Compliance Audit – last two compliance audit reports.
3. Training – operator/maintenance initial and refresher training records.

ANALYSIS OF DOUCMENTATION SUBMITTED:

Process Hazard Analysis (PHA)/Hazard Review: Wilbur-Ellis provided their 2014 Hazard Review and 2019 PHA that were conducted for the two Program 2 covered processes, anhydrous ammonia and aqueous ammonia storage and transfer.

The 2014 Hazard Review used the Asmark Institute® myRMP checklist method. The review identified one finding and recommendation to install a remote shutdown system for the anhydrous ammonia transfer operations. The scheduled completion date was November 30, 2015 and completed until February 2019.

The 2019 PHA was conducted by a consultant, David Weeks, RME Safety and Environmental LLC with a team of Wilbur-Ellis employees. The 2019 PHA used a What-if analysis method for each covered process, anhydrous ammonia and aqua ammonia. The anhydrous ammonia PHA identified eighteen (18) findings and recommendations. The aqua ammonia PHA also identified eighteen (18) findings and recommendations. The anhydrous ammonia PHA has three (3) open recommendations pertaining to adding first aid instructions for exposure to ammonia in the operating procedures, preparing line break procedures for the mechanical integrity program and updating the Emergency Action Plan in accordance with WAC 296-24-i67(b)(ii) describing how to use a handheld meter in the ammonia danger area to operate equipment during an emergency situation. These open recommendations have a completion date of December 15, 2021.

Compliance Audit: Wilbur-Ellis provided their 2016 and 2019 Compliance Audit reports. Both audits used a Program 2 checklist for each covered process, anhydrous ammonia and aqua ammonia. The 2016 audit identified six findings that were all completed in February 2019. The 2019 audit identified the following two findings: (1) lack written operating procedures that provide clear instructions or steps for safely conducting activities associated with each covered process and (2) the installation of a by-pass for use during start-up of the anhydrous ammonia system. Both findings were completed in August 2019.

In addition, the 2016 and 2019 audits identified the lack of equipment inspection in the operating procedures for each covered process, anhydrous ammonia and aqua ammonia. Wilbur-Ellis stated that equipment inspections are covered in their Maintenance and Mechanical Integrity procedures. Equipment inspections would also be included in their operating procedures that address such items as hose inspections before loading/unloading operations, checks for leaks, inspecting emergency shutdown cables and other critical items.

Training: Wilbur-Ellis provided a completed Training Summary for their five operators of anhydrous ammonia and aqua ammonia storage process. One operator, Todd Scott who was involved in the operating the process since 1991 has a signed written certification dated June 26, 2019 stating he has the required knowledge, skills, and abilities to safely carry out the duties and responsibilities as provided in the operating procedures. Wilbur-Ellis did not provide initial training documentation for Miguel Franco (4/12/2020) and Rachel Turner (2/23/2012). Wilbur-Ellis provided initial training documentation dated September 12, 2020 for two new operators, Doug Acosta and Pat Davidson. Wilbur-Ellis provided refresher training documentation for Todd Scott, Miguel Franco and Rachel Turner that were completed in 2017 and 2020.

AREAS OF CONCERNS:

1. Wilbur-Ellis written operating procedures did not address equipment inspections. Equipment inspections should be completed before starting any operation such as loading or unloading of anhydrous or aqua ammonia. This would include but not be limited to hose inspections, shutdown devices and checks for leaks or equipment damage.

2. RMP Registration: Wilbur-Ellis did not assign the correct program level to the anhydrous ammonia and aqua ammonia storage process as required by 40 C.F.R. 68.160(b)(7). The June 3, 2019 RMP submitted by Wilbur-Ellis identified the covered processes, anhydrous ammonia and aqua ammonia storage process, as a Program Level 2. Wilbur-Ellis retail sales of anhydrous ammonia to end users (i.e. farmers) is less than 50 percent, therefore the OSHA PSM retail facility exemption does not apply. Wilbur-Ellis mainly uses the anhydrous ammonia to manufacture aqua ammonia (20% concentration). As a result, the anhydrous ammonia storage process is OSHA PSM covered to meet the requirements of 40 C.F.R. 68.10(d)(2) as Program Level 3. The aqua ammonia storage process is also a Program Level 3 process. The interconnection between the anhydrous ammonia storage tanks, the stationary converter (reactor) and the aqua ammonia storage tanks is a single covered process. The highest program level can only be applied to the covered process.

3. Wilbur-Ellis did not provide initial training documentation for Miguel Franco (4/12/2020) and Rachel Turner (2/23/2012). Initial training documentation must be maintained for all employees involved with the process.

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

DOCUMENTS REQUESTED ON FOLLOW-UP:
The following documents were requested after the initial submission of documents. These documents were reviewed to determine compliance with Section 112(r) of the Clean Air Act.

1. Written clarification of the date the remote shutdown was installed.

AUDIT REPORT CERTIFICATION:
This is to certify that I, Bob Hales, was the lead inspector at this facility and that I have verified the accuracy of the observations in this inspection report:

Hales, Bob
Digitally signed by Hales, Bob
Date: 2021.10.07 07:58:16 -07'00'

Signature Date

JAVIER MORALES
Digitally signed by JAVIER MORALES
Date: 2021.10.07 09:09:24 -07'00'

RMP Coordinator/Approval Date

ERIN WILLIAMS
Digitally signed by ERIN WILLIAMS
Date: 2021.10.12 13:49:22 -07'00'

EPCRA Coordinator/Approval Date

Jennifer A Sullivan
Digitally signed by Jennifer A Sullivan
Date: 2021.10.14 16:38:51 -07'00'

Land Enforcement Section Chief/Approval Date