

CAA 112(r) INSPECTION REPORT

Name: Bartlett Coop Assoc. (Oswego)	
Address: 2205 West 4 th Street Oswego, KS 67356	Date of Inspection: 10/24/2024
County: Labette	Case No: 25KS1024
Phone: 620-226-3322	RMP No: 1000 0006 5984
High Risk: No	FRS No: 110000752141
CAA Title V: No	Program Level: Program 2
Process: Ammonia (Anhydrous)	

SUMMARY OF OBSERVATIONS

A review of the Bartlett Coop Assoc. (Oswego) (Bartlett Co-op) documents and facility revealed the following deficiencies:

1. Bartlett Co-op failed to update the RMP every five years as required by 40 CFR 68.190(b)(1).
2. Bartlett Co-op failed to update RMP emergency contact information within one month of a change as required by 40 CFR 68.195(b).
3. Bartlett Co-op failed to update hazard review every five years as required by 40 CFR 68.50(d).
4. Bartlett Co-op failed to offer refresher training every three years as required by 40 CFR 68.54(b).
5. Bartlett Co-op failed to perform test on process equipment required by recognized and generally accepted good engineering practices (CGA G-2.1 – 2014 section 5.6.8) by not pressure testing underground piping every five years as required by 40 CFR 68.56(d).
6. Bartlett Co-op failed to ensure that the process was designed in compliance with RAGAGEP (CGA G-2.1 – 2014 section 5.10.8.1) by not having emergency shutoff valve within five feet of the transfer system on the vapor lines, emergency shutoff valves within five feet of where the hose is attached to the fixed piping of the risers, and pull-away protection at the risers as required by 40 CFR 68.48(b). (Amended after the inspection).
7. Bartlett Co-op failed to resolve problems identified in the compliance audit in a timely manner as required by 40 CFR 68.50(c). (Finding identified after the inspection)
8. Bartlett Co-op failed to ensure that the process was designed in compliance with RAGAGEP (CGA G-2.1 – 2014 section 6.6.2) by not having a hazard warning label on

each container or group of containers as required by 40 CFR 68.48(b). (Finding identified after the inspection)

INTRODUCTION

I, Christina Gallick, a Compliance Inspector with the U.S. Environmental Protection Agency (EPA), Region VII, inspected Bartlett Co-op located in Oswego, Kansas on October 24, 2024.

I called Randy Walker, the location manager, on October 21, 2024, and was told Walter Eck is now the location manager. I left Mr. Eck a voicemail. I arranged for the inspection on October 21, 2024, with Mr. Sorrell, general manager. I sent an email to Mr. Sorrell and Mr. Eck explaining the time of the inspection, that I would do a facility tour and take photos, and the types of documents that I would like to look at. I asked that employees be notified of the inspection and informed they are allowed to participate. Bartlett Co-op was selected for inspection because the RMP was not updated at the five-year interval.

I conducted the inspection to determine if the facility complies with Section 112(r) of the Clean Air Act (CAA), as amended in 1990. The inspection also included reporting provisions of the Emergency Planning and Community Right to Know Act (EPCRA) and the release reporting provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

EPA's regulations describing how these laws are to be implemented are found in the Code of Federal Regulations, Title 40, Part 68 (CAA), 355, 370, and 372 (EPCRA). The law and the implementing regulations 40 CFR 68, Chemical Accident Prevention Program (CAPP) require that the facilities must submit a complete Risk Management Plan (RMP) to the EPA for those regulated chemicals they process in amounts above the applicable threshold quantities after June 21, 1999, and to implement the program described in the RMP.

The finalized inspection report as well as the photos and photo locations (Appendix 2) will be transmitted via e-mail to the facility owner/ operator. A copy of this inspection report, documents obtained, photographs taken during the inspection, checklists and completed forms will be maintained in the EPA facility file.

HISTORY OF BUSINESS

Bartlett Co-op acquired the Oswego location in the early 1980s. Bartlett Co-op is a grain focused co-op. At the Oswego location, Bartlett Co-op also sell anhydrous ammonia as fertilizer, have a service station, fuel station, farm store, and sell dry fertilizer and urea ammonium nitrate (UAN). The facility also sells propane directly to end users. The facility has six employees, one of whom works with ammonia. Normal business hours are 0800 to 1700. During ammonia season hours can run from 0500 to 2400, per customer request. Ammonia season is only in the spring at this location, running from mid-February through the end of March. Bartlett Co-op is west of Oswego, Kansas which is located in Labette County. Oswego has a population of 1,791 according to the 2020 Census.

	Amount of Anhydrous Ammonia in Pounds
2019 RMP	367,929
2024 RMP	274,000
Maximum Intended Inventory	274,000
2023 Tier II Maximum Daily Amount	368,000
Estimated Inventory during Inspection	169,157

PERSONS INTERVIEWED AND INDIVIDUAL RESPONSIBILITIES

Todd Dingler	ProValue Insurance	Safety and Compliance Area Manager
John Ricker	ProValue Insurance	Director of Safety and Compliance
Perry Sorrell	Bartlett Co-op	General Manager
Walter Eck	Bartlett Co-op	Location Manager
Trent Faulkner	Ag Services LLC	Safety and Compliance Director

OPENING CONFERENCE

I arrived at the facility at 0830 on October 24, 2024. I introduced myself and presented my credentials. I passed around a sign in sheet (Appendix 1). I explained that I was here to complete a CAA 112(r) and EPCRA non-313 inspection. I explained that I am a credentialed CAA 112(r) inspector but was in training for EPCRA. My supervisor would virtually attend the EPCRA portion of the inspection and that if we didn't have service, the EPCRA portion of the inspection would not occur.

I showed everyone a notice of inspection form and explained that this stated I was completing a CAA 112(r) and EPCRA non-313 inspection. I signed the form and Mr. Sorrell signed for Bartlett Co-op (Appendix 1). I explained that CAA 112(r)(6)(L) require the opportunity for employee participation in the inspection and asked if employees had been notified of the inspection. I was told that employees were notified and the one employee that works directly with ammonia, Mr. Eck, was participating in the inspection.

I explained that the facility had the right to claim any information collected as confidential business information. I provided the facility a small business resource fact sheet. I asked if we could start the inspection with the field tour and the facility agreed.

FIELD TOUR

The photos that I took during the field tour are in Appendix 2. We started the field tour at the bulk storage tanks. There are three storage tanks, but only two are in service (IMG_0075.JPG & IMG_0076.JPG). The northern most rail car tank has been out of service for two years. In the fall of 2023, it was disconnected from the bulkhead piping (IMG_0082.JPG). The southern most tank is a pressure vessel with a legible name plate (IMG_0077.JPG). The pressure vessel had a capacity of 30,000 gallons and was about 80% full or had about 123,360 pounds of ammonia (IMG_0078.JPG). The pressure vessel had patches of corrosion and peeling paint

(IMG_0084.JPG). I was told that the facility identified painting bulk tanks as a correction the facility needs to make but that the facility was waiting to paint until spring for better weather. I observed four pressure relief valves (PRVs), two per manifold, on the pressure vessel (IMG_0087.JPG). After the inspection I was sent photos of the pressure relief valves indicating that the PRVs were manufactured in 2022. These photos are maintained in the site file.

The middle tank, a rail car with an 11,000-gallon capacity, was about 81% full or held about 45,797 pounds of ammonia (IMG_0081.JPG). The tail of the center rail car tank was stamped with information about the construction of the tank (IMG_0083.JPG). The piers of the center rail car tank did not extend one third the circumference of the tank.

There were two emergency shutoff valves (ESVs) in operation at the facility (IMG_0079.JPG & IMG_0080.JPG). These were on the liquid lines leading into the pressure vessel and middle rail car tank. I saw no ESVs on the vapor lines. The pulls for the ESVs are located on the southern side of the western pier of the pressure vessel (IMG_0091.JPG). It was not labeled as an emergency shutoff.

The center rail car and the pressure vessel are plumbed together and share the same bulkhead (IMG_0092.JPG). The connection points and valves throughout the process were labeled vapor or liquid. At the bulkhead, the vapor line had a manual valve, and the liquid line had a manual valve and a check valve (IMG_0093.JPG).

The facility had a container for safety water next to the bulk tanks (IMG_0088.JPG). During ammonia season it sits on a pallet near the bulkhead (IMG_0089.JPG). I observed that the flex lines in the facility were at angles or were curved to connect to piping (IMG_0079.JPG, IMG_0080.JPG, IMG_0089.JPG, IMG_0091.JPG, IMG_0101.JPG).

The facility had two risers. The southern riser had hoses due to be replaced in 2025. The south side of the north riser had hoses due to be replaced in 2025 (IMG_0098.JPG), while the north side had hoses with replacement dates of 2031 (IMG_0096.JPG & IMG_0097.JPG). Both risers did not have ESVs (IMG_0099.JPG & IMG_0100.JPG). After the inspection I recognized that there are no breakaway devices attaching the hoses to the risers.

The facility has underground piping between the bulk tanks and the risers. I asked if the underground piping was pressure tested every five years. Mr. Eck was unaware that this was a requirement. I was shown a pressure gauge on the pump, but the facility only had one pressure gauge. Mr. Ricker discussed potential ways to pressure test the piping and Mr. Eck was interested in adding pressure gauges to the risers. There were signs with emergency contact information and the facility address near the propane bulk storage tank (IMG_0102.JPG).

We then observed the nurse tanks which were all empty. The nurse tanks still need maintenance work to be completed, but the ammonia season for the location does not start until mid-February. Many of the nurse tanks had corrosion (IMG_0104.JPG - IMG_0106.JPG). Mr. Eck stated that nurse tank 23 is out of service with expired ammonia hoses and that nurse

tank 24 needs paint. Mr. Eck explained that some nurse tanks are dropped off at the wrong Bartlett Co-op location and will be moved closer to ammonia season (IMG_0108.JPG). Mr. Eck took a picture of a legible data plate of one of the nurse tanks. He provided the picture after the inspection, and it is maintained in the site file. The nurse tanks had PRVs (IMG_0109.JPG).

EPCRA

Before the inspection, I reviewed Bartlett Co-op's Tier IIs from 2020-2023. I noticed that the only change in reporting was that sulfur dry stopped being reported after 2021.

During the inspection my supervisor, Dave Hensley, virtually attended the inspection while I asked questions related to EPCRA. Bartlett Co-op uses a computer inventory program to determine what chemicals and quantities to report on their Tier II. The facility stopped carrying sulfur dry in 2021. Bartlett Co-op reports chemicals that are below their threshold quantities to ensure that the fire department has the most complete information in the event of an incident. Bartlett Co-op send their Tier II to the SERC, LEPC, and local fire department. The facility's contractor helps ensure that Tier IIs are submitted annually. I asked if the facility had any releases in the past five years and was told that they had not.

HAZARD ASSESSMENT

I reviewed the facility's hazard assessment (Appendix 3). The facility last updated their hazard assessment on October 22, 2024. Bartlett Co-op uses DEGADIS to determine distance to endpoint for worst-case and alternative release scenarios. DEGADIS uses the appropriate parameters required by 40 CFR 68.22. The worst-case release scenario vessel was the pressure vessel 85% full of anhydrous ammonia. The facility selected urban terrain due to the presence of buildings and trees near the process, which I concur with. The alternative release scenario is a hose bursting at the risers, releasing ammonia for two minutes until the release is stopped, assuming urban terrain. The facility used Marplot to determine offsite impacts for the worst-case release scenario and alternative release scenario.

We discussed how Marplot still uses 2010 census data and has not been updated yet. We discussed potential other programs to use to estimate population. Missouri Census Data Center Circular Area Profiles uses 2020 data but is less accurate for distances under 3 miles. Both of Bartlett's release scenarios are less than three miles. We also discussed the potential to use EJ Screen to estimate population. EJ Screen recommends using several census block groups to have more reliable information. Bartlett Co-op's worst-case scenario and alternative release scenario are both smaller than the surrounding census block group, the smallest geographic unit of the census. The estimated population will always be less accurate regardless of program Bartlett Co-op uses because the programs will have to extrapolate how many people live in a smaller area.

The facility has not had a release in the past five years and does not have a five-year accident history.

SAFETY INFORMATION

I observed a copy of the Compressed Gas Association, Inc. (CGA) G-2.1 – 2014 Requirements for the Storage and Handling of Anhydrous Ammonia and the Kansas Anhydrous Ammonia Regulations and Inspections May 1, 1988, in the facility's RMP binder, but did not take a copy. The safety information I collected is in Appendix 4. The facility had a maximum intended inventory which I took a copy of. I reviewed the safe operating limits of the facility and took a copy. Safety information also included information on the hazards of ammonia, consequences of deviations, safety systems and functions, and a job safety analysis. There was also a USB in the RMP binder that contained a document with manufacturer's information about equipment installed at the facility which I reviewed. I wrote down the brands of flex line used at the facility. During the inspection I noticed that there were some bends in the flex line and asked if the bends were within manufacturer's specifications. Mr. Ricker mentioned an equation to calculate how much flex line can bend. After the inspection, I did research on the flex lines installed at the facility. According to a [manufacturer's website](#), the flex line installation depends on the direction, frequency, and amplitude of vibrations and that in certain scenarios a bend in the flex line is necessary to reduce vibration. The process was not in operation, so I did not observe pipe vibration.

During the field tour I observed the name plate of the middle rail car tank (IMG_0083.JPG). I was unfamiliar with this type of nameplate. Bartlett Co-op had an annotated picture of the nameplate in the safety information of their RMP binder and I took a copy. This rail car tank was constructed in 1942. CGA G-2.1 – 2014 mentions the allowance of use of containers built in 1949 and after under ASME code but does not mention any earlier years. There is no ASME stamp on the Tank, but I don't know if this was required in 1942 or if it was required on rail cars. The tank was pressure tested in 1970 to 300 PSI. There was no R stamp for alterations made to the tank to convert it to be a stationary ammonia vessel. Because of the lack of maintenance records (see Maintenance section), I do not know if the facility has completed any inspections since 1970 to determine if the rail car is still fit for service. There was no information on the nameplate about if the rail car had been stress relieved. If the rail car was not stress relieved, the rail car would be subject to the testing requirements of CGA G-2.1 – 2014 Section 5.1.1.5. Because of my unfamiliarity with this type of tank, I did not ask the facility if this testing had been done during the inspection. More information is required to determine the safety of the tank.

During the field tour I noticed that there were not ESVs on the risers (IMG_0099.JPG & IMG_0100.JPG). While reviewing photos that I took during the field tour I noted that there was no ESV anywhere on the vapor line. I asked if it was just the angle of my photos, but Mr. Eck confirmed that there was no ESV on the vapor line. Adding an ESV to the vapor line was a recommendation of the 2022 compliance audit that was never completed (see Compliance Audit section). CGA G-2.1 – 2014 Section 5.10.8.1 requires that "all stationary storage installations with a water capacity greater than 4000 gal (15.1 m³) shall have approved emergency shutoff valve(s) or backflow check valves installed in the liquid and vapor fixed piping of the transfer system within 5 lineal ft (1.5 m) or within reasonable distance of where the hose or swivel piping is attached to the fixed piping. This requirement does not apply to fixed piping feeding a process system. These emergency shutoff valve(s) or backpressure check

valves shall be protected from any possible pull-away-while-connected incident between the mobile container and the transfer station.”

Mr. Ricker interpreted the requirement to apply to bulkheads only, since one of the methods to prevent break away events was a reinforced bulkhead. However, another pull-away-while-connected method listed is the use of shear fittings, which are used at risers to protect piping from breaking if a nurse tank rolls away while connected. This indicates that CGA G-2.1 – 2014 Section 5.10.8.1 is meant to apply to the transfer system at the bulkhead and the risers.

There were no safety shears or breakaway devices on the riser to protect from a pull away nurse tank. Protection from pull-away-while-connected incidents is required for all connections to mobile containers.

40 CFR 68.48(b) states, “The owner or operator shall ensure and document that the process is designed in compliance with recognized and generally accepted good engineering practices.” During the inspection, I made the following finding: Bartlett Co-op failed to ensure that the process was designed in compliance with RAGAGEP (CGA G-2.1 – 2014 section 5.10.8.1) by not having emergency shutoff within five feet of the transfer system or on the vapor lines as required by 40 CFR 68.48(b). After reviewing the standard and discussing with my colleagues and supervisor, I amended the finding:

- 6. Bartlett Co-op failed to ensure that the process was designed in compliance with RAGAGEP (CGA G-2.1 – 2014 section 5.10.8.1) by not having emergency shutoff valve within five feet of the transfer system on the vapor lines, emergency shutoff valves within five feet of where the hose is attached to the fixed piping of the risers, and pull-away protection at the risers as required by 40 CFR 68.48(b).**

After the inspection I was provided photos of break-aways on the risers and ESVs on the vapor lines of the bulk tanks. These photos are maintained in the site file.

While reviewing photos of the bulk tanks after the inspection I noticed that all of the tanks were labeled in large letters “Anhydrous Ammonia”, but none of the tanks had a hazard label for all hazards (IMG_0075.JPG, IMG_0076.JPG, IMG_0080.JPG & IMG_0084.JPG - IMG_0089.JPG). The pressure vessel had a label stating, “Inhalation hazard” (IMG_0090.JPG), but had no label warning about flammability. CGA G-2.1 – 2014 Section 6.6.2 states, “Each container or group of containers shall be conspicuously marked with a hazard warning label complying with 29 CFR 1910.1200.” After the inspection, I identified the following finding:

- 8. Bartlett Co-op failed to ensure that the process was designed in compliance with RAGAGEP (CGA G-2.1 – 2014 section 6.6.2) by not having a hazard warning label on each container or group of containers as required by 40 CFR 68.48(b).**

I told the facility that I remembered one of my colleagues looking into if ESVs needed to be labeled and wasn’t sure what she had determined. I told them I would do more research and

determine if it was a requirement to label the emergency shutoff. While labeling emergency shutoffs is best practice, it is not a requirement in CGA G-2.1 – 2014, the industry standard that the facility follows. After the inspection I was provided an image of labeled emergency shutoff pulls which is maintained in the site file.

HAZARD REVIEW

I reviewed Bartlett Co-op's hazard reviews from October 23, 2024, and March 27, 2019 (Appendix 5). This is over five year and 6-month interval. 40 CFR 68.50(d) requires that the hazard review is updated at least every five years. During the inspection, I identified the following finding:

3. Bartlett Co-op failed to update hazard review every five years as required by 40 CFR 68.50(d).

I reviewed the 2024 hazard review, which was completed by the general manager who is knowledgeable in the process. The hazard review identified the hazards associated with the process, opportunities for equipment malfunctions or human errors that could cause an accidental release, and safeguards to reduce the risk of an accidental release. The hazard review identified that the facility needs to repaint the bulk tank, the pipes, and replace damaged or missing decals. The corrective actions were assigned to the location manager and a due date was set.

STANDARD OPERATING PROCEDURES (SOPs)

Bartlett Co-op's SOPs were most recently reviewed on March 27, 2019, and October 23, 2024 (Appendix 6). There are operating procedures for initial startup, normal shutdown, emergency shutdown and operations, startup following an emergency shutdown, and normal operations. Bartlett Co-op documented that temporary operations are not allowed. Operating procedures include safety precautions to protect workers and to reduce the risk of a release. Stylizations including all capital letters and bold font are used to emphasize important deviations to avoid and how to avoid them. Consequences of deviations emphasize the importance of following all steps of the procedures, completing equipment inspections, and wearing appropriate PPE.

TRAINING

New employees who will be handling ammonia are sent to an ammonia safety class presented by an industry group. Employees demonstrate their knowledge of ammonia safety in a multiple-choice test. Then new employees complete site-specific training. Employees receive hands on training for SOPs. They must demonstrate competence with the procedures which is documented in a checklist.

I reviewed and took copies of recent training records (Appendix 7). The most recent refresher training was completed on October 23, 2024, and consisted of procedure review. Training in 2019 included anhydrous ammonia nurse tank failure maintenance on November 25, and new employee training in April. Refresher training was completed after 4 years and 10 months after the last training. 40 CFR 68.54(b) states, "Refresher training shall be provided at least every

three years, and more often if necessary, to each employee operating a process to ensure that the employee understands and adheres to the current operating procedures of the process. The owner or operator, in consultation with the employees operating the process, shall determine the appropriate frequency of refresher training.” Because the refresher training was completed one year and 10 months late, I identified the following finding:

4. Bartlett Co-op failed to offer refresher training every three years as required by 40 CFR 68.54(b).

MAINTENANCE

Bartlett Co-op has a short maintenance procedure in Appendix 6. During the inspection, I was shown a long document that included equipment specifications and maintenance and inspection procedures. Bartlett Co-op employees are trained on maintenance. The previous lead maintenance employee recently passed away. He relied on memory and a notebook in his pocket to track maintenance activities. Bartlett Co-op Oswego does not have any maintenance logs. The company is trying to get back into using a system to track maintenance. I saw no maintenance or inspection records.

During the field tour I noted that some of the nurse tanks were corroded, and Mr. Eck stated that one nurse tank had an expired hose. The nurse tanks did not contain ammonia and will undergo maintenance before they are put into service in February 2025. I noted that there was underground piping between the bulk tank and the risers. CGA G-2.1 – 2014 section 5.6.8 states, “Underground piping shall be evaluated at a minimum of every 5 years to ensure leak-tightness.” I asked when the last time the underground piping had been pressure tested. Mr. Eck was not aware that this was a requirement and stated it had not occurred. He immediately began discussing how to pressure test the system with Mr. Ricker. 40 CFR 68.56(d) states, “The owner or operator shall perform or cause to be performed inspections and tests on process equipment. Inspection and testing procedures shall follow recognized and generally accepted good engineering practices. The frequency of inspections and tests of process equipment shall be consistent with applicable manufacturers' recommendations, industry standards or codes, good engineering practices, and prior operating experience.” I identified the following finding:

5. Bartlett Co-op failed to perform test on process equipment required by recognized and generally accepted good engineering practices (CGA G-2.1 – 2014 section 5.6.8) by not pressure testing underground piping every five years as required by 40 CFR 68.56(d).

After the inspection I was provided documentation of an underground piping pressure test that was completed on November 14, 2024. This documentation is maintained in the site file.

COMPLIANCE AUDIT

I reviewed and took copies of Bartlett Co-op’s compliance audits from 2022 and 2024 (Appendix 8). These audits were completed about 2 years and seven months apart. Both audits were conducted by the location manager at the time of the audit and had a report of audit findings.

The March 3, 2022, audit identified that the facility was not designed and constructed in accordance with industry-accepted engineering practices. Corrective actions identified were underground leak check, saddle extensions, tank painting, ESV on vapor bulkhead and tank decals faded. The deficiencies were scheduled to be corrected within 365 days of the audit. During the field tour I noticed that the vapor bulkhead did not have an ESV and was told that the facility had not pressure tested the underground piping every five years. The inspection occurred one year and seven months after the due date Bartlett Co-op set for correcting the deficiencies identified in the 2022 compliance audit.

I mentioned that the deficiencies of the 2022 compliance audit were not corrected within the set timeframe. Mr. Ricker explained that the recent farm economy has made it difficult to make upgrades on equipment. I explained that facilities can document extensions to the timeframe to make corrections. I explained that extensions should not be based on financial reasons alone. I explained procurement and labor could be potential reasons to extend a deadline. I also referred to the Occupational Safety and Health Administration (OSHA) reasons to justifiably decline a process hazard analysis recommendation and said these could be considered to extend a deadline for a recommendation. Extensions of deadlines should be documented.

40 CFR 68.50(c) states, "The owner or operator shall document the results of the review and ensure that problems identified are resolved in a timely manner." After the inspection I identified the following finding:

7. Bartlett Co-op failed to resolve problems identified in the compliance audit in a timely manner as required by 40 CFR 68.50(c).

INCIDENT INVESTIGATION

I reviewed the facility's form for incident investigations. This form appeared to include all of the information required to be included in an incident investigation report required by 40 CFR 68.60(d). Bartlett Co-op has not had any recent releases or incidents.

EMERGENCY RESPONSE

Bartlett Co-op is a non-responding facility. I reviewed and took a copy of the facility emergency action plan (Appendix 9). The plan describes what to do in the event of a release, how to provide first aid for ammonia exposure, and where incident investigation forms can be found. Assembly points are described. The EAP needs to be updated to reflect changes in leadership at the location. I also reviewed and took a copy of the hazardous communication policy. This included a list of who to call in the event of a chemical release. I did not take a copy of the fire prevention plan.

Mr. Eck explained that the facility has had the fire department tour the facility, but that this does not occur often because it is a volunteer department. Most of the coordinations occurs when the facility mails in their Tier II forms. The sole employee who works with anhydrous ammonia is also a part of the fire department. I explained that the emergency response

notification exercise requirement is coming into effect on December 19, 2024, and annual thereafter.

I spoke with Brandy Grassl, the Labette County LEPC Chairperson, on November 4, 2024, at 1140. She stated that Bartlett Co-op is part of the Community Emergency Response Plan and is a great partner for planning. She said Jessica Sproul attends LEPC meetings for Bartlett Co-op. Bartlett Co-op has provided their Tier II to the LEPC.

MANAGEMENT SYSTEM

Bartlett Co-op has an organizational chart that assigns responsibilities to the general manager, agronomy manager, and safety director (Appendix 10). The chart appears to meet the requirements of 40 CFR 68.15.

RISK MANAGEMENT PLAN

I reviewed the April 2, 2019, RMP before the inspection. I noted that the five-year resubmittal date was April 2, 2024. Bartlett Co-op resubmitted their RMP on October 23, 2024. This is a five-year, six-month interval. 40 CFR 68.190(b)(1) requires RMPs to be revised and updated at least once every five years. I identified the following finding:

- 1. Bartlett Co-op failed to update the RMP every five years as required by 40 CFR 68.190(b)(1).**

When I announced the inspection, I was told that Randy Walker retired and that Walter Eck is the new location manager. When the RMP was updated in 2024, Mr. Eck replaced Mr. Walker as the RMP emergency contact. Mr. Eck explained that Mr. Walker left Bartlett Co-op in February 2024. Bartlett Co-op took about 8 months to update their RMP emergency contact. 40 CFR 68.195(b) requires emergency contact information to be updated within a month of any change in information. I identified the following finding:

- 2. Bartlett Co-op failed to update RMP emergency contact information within one month of a change as required by 40 CFR 68.195(b)**

CLOSING CONFERENCE

I passed around the closing conference sign-in sheet. I signed the document received form and Mr. Sorrell signed for Bartlett Co-op. I passed the CBI form to the facility and stated they could claim any information as CBI. Mr. Sorrell indicated that nothing would be claimed as confidential and signed the form on behalf of Bartlett Co-op. I explained that I would write an inspection report based on what I observed during the inspection. I explained that the inspection report would be sent via email and that I would let them know before it was sent in case the email went to the junk folder. I explained that I saw Mr. Sorrell was the registered agent for the facility and asked if the email address I had for him was correct. He confirmed that it was. I discussed the preliminary findings with the facility and areas that I needed to do more research in. Mr. Sorrell signed the notice of preliminary findings (Appendix 1). I explained that if

the facility provided evidence of any corrections within 30 days of the inspection, I would include it in the inspection report. I left the facility at around 1400.

**CHRISTINA
GALLICK**

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GALLICK
Date: 2024.12.09 12:42:36
-06'00'

Christina Gallick
Compliance Inspector
Chemical Accident Prevention Section
Air Branch
Enforcement & Compliance Assurance Division
Region 7 U.S. Environmental Protection Agency

**Hensley,
Dave**

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Dave Hensley
Supervisor
Chemical Accident Prevention Section
Air Branch
Enforcement & Compliance Assurance Division
Region 7 U.S. Environmental Protection Agency

ATTACHMENTS

- 1 – Inspection Forms
- 2 – Photo Log
- 3 – Hazard Assessment
- 4 – Safety Information
- 5 – Hazard Review
- 6 – Standard Operating Procedures
- 7 – Training
- 8 – Compliance Audit
- 9 – Emergency Response
- 10 – Management System