United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report

Red Star Yeast Company

Headland, Alabama
March 2, 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 the anhydrous ammonia storage and conversion to aqueous ammonia process at the Red Star Yeast Company facility located in Headland, Henry County, Alabama. This facility was selected for inspection because it had never been inspected under the RMP. The inspection, which was conducted on March 2, 2022, consisted of an examination of program documentation as well as site reviews of various aspects of facility operations. Personnel from the facility participated throughout the inspection. Requested program documents were provided for further review off-site. This report will provide a background of the facility and a listing of observations.

2.0 Background

The Red Star Yeast Company facility is located in Headland, Alabama. The facility uses anhydrous ammonia in the process to manufacture yeast products. Anhydrous ammonia is added to water and then used as a nitrogen source in the process to make yeast. The process is regulated as program level 3. According to facility records, the facility has a maximum of 102,420 pounds of ammonia (anhydrous) on site. The anhydrous ammonia storage process at the facility is 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-In-Training: Bethany Terpin, EPA
Inspector: Jordan Noles, EPA
Inspector-In-Training: Chet Gala, EPA
Date of Facility Visit: March 2, 2022

Facility Identification

Name: Red Star Yeast Company
Street Address: 13211 US Highway 431 S
City: Headland County: Henry State: Alabama Zip: 36345
EPA Facility ID No: 1000 0005 9802
Dun & Bradstreet (D&B) No: 883925471
Latitude: 31.398611
Longitude: -085.323194

Name, address and phone of corporate parent company:
Owner/Operator: Lesaffre Yeast Corporation
Mailing Address: 7475 W Main Street
City: Milwaukee State: Wisconsin Zip: 53214
Phone: (414) 615-3300

Name, title, and email of person responsible for 40 C.F.R. Part 68 implementation:
Name: Sherre-Ann Wallace
Title: Environmental Health and Safety Manager
Phone: (334) 649-3914
Email: s.wallace@lesaffre.com

Name and title of emergency contact:
Name: Dennis Barry
Title: Plant Manager
Day phone: (800) 327-2512
24-hour Phone: (800) 327-2512
Email: d.barry@lesaffre.com

Name and titles of stationary source personnel involved in site inspection *(accompanied site tours, provided documents and explanations):*
Name: Sherre-Ann Wallace
Title: EHS Manager
Phone: (334) 400-3532
Email: s.wallace@lesaffre.com

Name: Cryille Mangin
Title: Maintenance Manager
Phone: (319) 601-9735
Email: c.mangin@lesaffre.com

Name: Mike Remect
Title: Production Superintendent
Phone: (334) 726-4859
Email: m.remect@lesaffre.com

Name: Garvin Hoffman
Title: QA Manager
Phone: (334) 649-3901
Email: g.hoffman@lesaffre.com

Name: Dennis Barry
Title: Plant Manager
Phone: (334) 718-5671
Email: d.barry@lesaffre.com

Name: Alex Thomas
Title: Process Engineer
Phone: (334) 441-7222
Email: al.thomas@lesaffre.com

Note: This is not a union facility.

<u>Date and Program Levels of Submitted Risk Management Plan</u>

Date of initial submission: June 21, 1999
Date of most recent submissions: June 15, 2020
Process: Anhydrous Ammonia storage
Process ID: 1000109413
Program Level as reported in RMP: 3
NAICS code: 311999 (All Other Miscellaneous Food Manufacturing)

3.0 Observations

The inspection of the Red Star Yeast Company facility evaluated various sections of the RMP regulations (40 C.F.R. Part 68, Program Level 3) and the inspection checklist included in "Guidance for Conducting Risk Management Programs Inspections under Clean Air Act Section 112(r)." The inspection included an opening conference where EPA inspectors reviewed documents associated with the facility's Risk Management Plan. The discussion was followed by a tour of the facility's anhydrous ammonia storage areas. An inspection out-brief was conducted where EPA inspectors requested additional documents for review off-site and described their observations. Observations from the RMP inspection at the Red Star Yeast Company facility are discussed below:

1. 40 C.F.R. § 68.65(d)(2) requires the owner or operator to document that equipment complies with recognized and generally accepted good engineering practices (RAGAGEP).

- At the time of the inspection, there was not a prominent sign indicating the contents of the anhydrous ammonia tank.

  Section 6.6.1 of CGA G- 2.1 Requirements for the Storage and Handling of Anhydrous Ammonia, Sixth Edition states, "*Each container or group of containers shall be marked on at least two sides, which are visible with the words, ANHYDROUS AMMONIA, or CAUTION- AMMONIA, in sharply contrasting colors with letters not less than 3.9 in (100 mm) high*."

2. 40 C.F.R. § 68.69(a) requires the owner or operator to develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information and shall address at least the following elements.
   (1) Steps for each operating phase:
   (iii) Temporary operations;
   (iv) Emergency shutdown including the conditions under which emergency shutdown is required, and the assignment of shutdown responsibility to qualified operators to ensure that emergency shutdown is executed in a safe and timely manner.
   (v) Emergency operations;
   (vi) Normal shutdown; and,
   (vii) Startup following a turnaround, or after an emergency shutdown.
   (3) Safety and health considerations:
   (i) Properties of, and hazards presented by, the chemicals used in the process;
   (iii) Control measures to be taken if physical contact or airborne exposure occurs;
   (iv) Quality control for raw materials and control of hazardous chemical inventory levels; and,
   (v) Any special or unique hazards.
   (4) Safety systems and their functions.

   - At the time of the inspection, the operating procedures included steps for normal operation, but did not include the elements listed above.

3. 40 C.F.R. § 68.69(c) requires the owner or operator to certify annually that operating procedures are current and accurate.

   - At the time of the inspection, there was no evidence that the facility certifies operating procedures annually.

4. 40 C.F.R. § 68.75(b)(3) requires the owner or operator to establish and implement written procedures to manage changes, and to assure that modifications to operating procedures are addressed prior to any change.

   - At the time of the inspection, the Management of Change (MOC) procedures did not assure that potential modifications to operating procedures are addressed prior to the change.

5. 40 C.F.R. § 68.77(a) requires the owner or operator to perform a pre-startup safety review (PSSR) for modified stationary sources when the modification is significant enough to require a change in the process safety information.

    - At the time of the inspection, there were two MOC forms completed that required a PSSR before initiating the change. These MOC forms were not fully certified and signed by management, which means that the associated PSSRs were not performed. Therefore, the PSSRs were not completed before startup as required. Additionally, the facility was unable to produce documentation of an initial PSSR completed prior to startup of the anhydrous ammonia process in 2019.

6. 40 C.F.R. § 68.87(b)(5) requires the owner or operator to periodically evaluate the performance of the contract owner or operator in fulfilling their obligations.

    - At the time of the inspection, facility representatives were unable to demonstrate that they periodically evaluate the performance of their contractors.

7. 40 C.F.R. § 68.93(a) requires the owner or operator to coordinate annually with local emergency planning and response organization 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.

    - At the time of the inspection, the facility had not coordinated annually with emergency response organizations. The Dothan Fire Department visited the facility in 2019. There is no evidence that the fire department visited the facility in 2020 or 2021.

Inspection Report,

Prepared by:

BETHANY TERPIN Digitally signed by BETHANY TERPIN
Date: 2022.04.18 09:14:18 -04'00'

Bethany Terpin, Inspector-In-Training Date
North Air Enforcement Section
U.S. EPA Region 4

JORDAN NOLES Digitally signed by JORDAN NOLES
Date: 2022.04.18 10:44:34 -04'00'

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

Approved by:

JASON DRESSLER Digitally signed by JASON DRESSLER
Date: 2022.04.18 13:29:21 -04'00'

Jason Dressler, Section Chief Date
North Air Enforcement Section
U.S. EPA Region 4