



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 155
Seattle, WA 98101

ENFORCEMENT &
COMPLIANCE ASSURANCE
DIVISION

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

FACILITY INFORMATION:

Name: Tristar Transload PNW Inc.
Physical Address: 3702 NW Gateway Ave, Vancouver, WA 98666
Phone Number: 360-823-1000
Latitude/Longitude: 45.648751, -122.720350
RMP Facility ID#: 1000 0023 4542
FRS ID#: 110070070348
EJ Concerns: Yes (above 80%)

CONTACT INFORMATION (RMP Implementation):

Name: Peter Howe
Phone Number: 360-823-1000
E-mail: peter@tristarnpnw.com

EMERGENCY CONTACT INFORMATION:

Name: Peter Howe
Phone (24-hr): 503-807-2952
E-mail: peter@tristarnpnw.com
Website: tristarnpnw.com

TRIP DETAILS:

Inspection Date: April 1, 2022
Inspection Time: 09:00 through 11:45
Inspectors: Edward Johannes, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Bob Hales, US EPA Region 10 SEE Grantee, RMP Inspector
Terry Garcia, US EPA Region 10 SEE Grantee, RMP Inspector
Peter Phillips, US EPA Region 10 SEE Grantee, RMP Inspector
Tom Vroman, Weston Solutions, Inc., EPA START Contractor

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: November 28, 2018

Date of Latest Update: November 28, 2018

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)
1000092477	LPG Railcar Staging and Transfer	1000115727	49311	3	Propane (74-98-6)	3,100,000

PURPOSE:

The purpose of this inspection 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.

- The facility has been previously inspected in the past 5 years: No ☒ Yes ☐
If Yes, Date of Last Inspection:
- 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 the 2022 Tier II report to the SERC?

No ☐ Yes ☒*If Yes, Date the Tier II was submitted:* 3/30/2022*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:* 4/12/2022**INSPECTION ENTRY:**

Edward Johannes led the inspection entry. The inspection team met with Xavier Aguilera at the Tristar Transload facility in Vancouver, Washington. The team arrived at the facility at 09:00 hours and was joined by the following facility personnel:

Name	Title
Peter Howe	President
Xavier Aguilera	Consultant
Greg Enders	Yard Supervisor

Was a state/county/or local emergency representative present? No ☒ Yes ☐

If Yes, Name and Title of Representative:

The facility is a first responder: No ☒ Yes ☐

If No, Responding Agency: Vancouver Fire Department

The inspection team was escorted to a conference room located in the facility's office building. Introductions were made by Edward Johannes, who provided a summary of the risk management program (RMP) and explained the purpose of the visit. Each team member presented his/her credentials.

EPA then requested an explanation of the facility's operations and any additional safety measures that should be taken during the site tour. Greg Enders and Xavier Aguilera gave a brief description of the facility, operations, and personal protective equipment required for the tour.

Prior to the inspection, EPA sent a certified notice of inspection letter to the facility informing them of the 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, and that a copy of the letter must be provided to the employee representative(s) and the letter posted in a manner accessible to employees in the facility.

The facility is unionized: No ☒ Yes ☐

If Yes, Name of Union:

An employee representative present during the facility visit: No ☒ Yes ☐

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 Tristar Transload PNW Inc. (Tristar). The facility stores propane in railcars staged in the facility yard. Tristar is responsible for transferring bulk propane from railcars using leased transloading equipment. Tristar previously transloaded butane, and the butane process ended in March 2020. There are eleven full-time employees on site, two of whom are responsible for transloading propane.

Tristar receives railcars via a railway spur to the property. The railcars are stored on the Tristar property, on both the east and west side of NW Gateway Avenue. Tristar employees operate leased transloading carts, transferring propane between trucks and railcars. Tristar is responsible for maintaining the transloading carts. There are no process modifications that impact the transloading process.

ON-SITE OBSERVATIONS:

The facility tour was conducted from approximately 09:30 hours to 10:00 hours. The EPA inspection team was escorted by Xavier Aguilar and Greg Enders. The inspection team observed both east and west rail yards and the equipment used in the process. Tristar was not performing the transloading process during the inspection. Tristar operates two transloaders, identified as P1 and P2. Transloader P1 was used earlier in the day, and remained connected to the railcar. Transloader P1 was equipped with four emergency stops on the ground level (photos 7, 9, 10, and 12) and one at the top of the staircase (photo 19). The hoses on transloader P1 were inspected on 3/28/22 and were marked with the inspection date (photos 4, 5, and 16). The grounding cable was still attached to the railcar (photo 11). Tristar employees showed the inspectors the air monitoring device they use during transloading (photo 13). Transloader P2 was locked out of service, as the hoses were being inspected by a third party vendor. The photographs that were taken at the facility are included in Attachment A to this report.

After touring the RMP-covered process areas at the Tristar Transloading PNW Inc, the inspection team returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to Peter Howe and Xavier Aguilar.

INFORMATION COLLECTED FROM FACILITY:

1. Propane Standard Operating Procedure Dated 7/16/18 (7 pages)
2. Propane & Butane Transloading Safety Information (2 pages)
3. Tristar Transload Butane Railcar Storage and Transloading First Responder Orientation Session Roster (1 page)
4. RMP Process Specific Information Section 1.17 Dated 1/2/2018 (1 page)
5. Facility Operator and Maintenance Training Summary Sheet Dated 9/1/2020

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

1. The owner or operator did not train each employee involved in maintaining the on-going integrity of process equipment [68.73(c)].
2. The owner or operator did not certify annually that the operating procedures are current and accurate and that the procedures have been reviewed as often as necessary to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to stationary sources [68.69(c)]
3. The owner or operator had not submitted their 2021 Tier II to the LEPC and local fire department.

DOCUMENTS REQUESTED NOT INCLUDED IN REPORT:

The following documents were requested during the inspection but are not included in this report. These documents will still be reviewed to determine compliance with Section 112(r) of the Clean Air Act and with Section 312 of the Emergency Planning and Community Right to Know Act (EPCRA).

1. Contractor evaluations from contracted maintenance provider.
2. Initial and refresher training.
3. Copy of 2021 submittal of Tier II to the LEPC and local fire department.

INSPECTION REPORT CERTIFICATION:

This is to certify that I, Edward Johannes, was the lead inspector at this facility and that I have verified the accuracy of the observations in this inspection report:

EDWARD JOHANNES Digitally signed by EDWARD
(Affiliate) JOHANNES (Affiliate)
Date: 2022.06.16 15:32:17 -07'00'

Inspector Signature

JAVIER MORALES Digitally signed by JAVIER
MORALES
Date: 2022.06.17 09:15:38 -07'00'

RMP Coordinator/Approval

ERIN WILLIAMS Digitally signed by ERIN
WILLIAMS
Date: 2022.07.05 11:53:06 -07'00'

EPCRA Coordinator/Approval

Jennifer A Sullivan Digitally signed by Jennifer A
Sullivan
Date: 2022.07.05 12:16:24 -07'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: Tristar Transload PNW Inc.
City, State: Vancouver, Washington
Photographer: Tom Vroman

File	Photo Layout	Number	Date	Time	Description
IMG_4034		1	4/1/2022	9:23 AM	Front door of trailer
IMG_4038		2	4/1/2022	9:33 AM	East railyard where Tristar stores and transloads railcars
IMG_4043		3	4/1/2022	9:45 AM	Photo of transloader P1
IMG_4044		4	4/1/2022	9:46 AM	Hose connection inspected on 3/28/22
IMG_4045		5	4/1/2022	9:46 AM	Hose inspected 3/28/22
IMG_4046		6	4/1/2022	9:47 AM	Hose plated 07/2020 on transloader P1
IMG_4047		7	4/1/2022	9:47 AM	Emergency shutoff located on corner of transloader P1
IMG_4048		8	4/1/2022	9:47 AM	Hosing transporting liquids and vapors
IMG_4049		9	4/1/2022	9:47 AM	Emergency shutoff and fire extinguisher
IMG_4050		10	4/1/2022	9:47 AM	Emergency stop on corner of transloader P1
IMG_4051		11	4/1/2022	9:47 AM	Grounding cable used during transloading process
IMG_4052		12	4/1/2022	9:48 AM	Emergency shutoff valve on transloader P1
IMG_4053		13	4/1/2022	9:48 AM	Air monitoring device used during transloading process
IMG_4054		14	4/1/2022	9:49 AM	Compressor and power supply on transloader P1
IMG_4055		15	4/1/2022	9:49 AM	Compressor and power supply on transloader P1
IMG_4056		16	4/1/2022	9:52 AM	Hose inspected on 3/28/22
IMG_4057		17	4/1/2022	9:55 AM	Train car chocked and placarded
IMG_4058		18	4/1/2022	9:55 AM	Transloading motor
IMG_4059		19	4/1/2022	9:57 AM	Emergency stop located on top of transloader
IMG_4060		20	4/1/2022	9:57 AM	Top of traincar. Connected to transloader.
IMG_4065		21	4/1/2022	10:26 AM	Sign in sheet