



**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 – Tier II
Facility Inspection Report**

FACILITY INFORMATION:

Name: Wilbur-Ellis Company (Fairfield, WA)
Physical Address: 404 North 1st St., Fairfield, WA 99012
Phone Number: (509) 283-2411
Latitude/Longitude: 47.390050/-117.173405
RMP Facility ID#: 100000092776
FRS ID#: 110015514059
EJ Concerns: No (Below 80%)

CONTACT INFORMATION (RMP Implementation):

Name: Junior Thies
Phone Number: (509) 283-2411
E-mail: JThies@wilburellis.com

EMERGENCY CONTACT INFORMATION:

Name: Junior Thies
Phone (24-hr): (509) 951-6281
E-mail: JThies@wilburellis.com
Website: <http://ag.wilburellis.com/Locations/Pages/Fairfield.aspx>

TRIP DETAILS:

Inspection Date: July 14, 2023
Inspection Time: 0815 through 1000 hours
EPA Inspection Team:
Peter Phillips, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Mhara Coffman, US EPA Region 10, RMP Inspector
Terry Garcia, US EPA Region 10 SEE Grantee, RMP Inspector
Edward Johannes, US EPA Region 10 SEE Grantee, RMP Inspector
Mike Wolski, Weston Solutions, Inc., EPA START Contractor

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: June 21, 1999
Date of Latest Update: May 6, 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)
1000098192	Anhydrous Ammonia	1000123185	42491	2	Ammonia, Anhydrous (7664-41-7)	210,000

PURPOSE:

The purpose of this inspection was to determine if 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 ☐
- 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 ☐

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: 25 lbs. released on 7/11/2022, but below threshold for EPCRA reportable release.

EPCRA TIER II REPORTING:

Did the facility submit the 2023 Tier II report to the SERC? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 02/17/2023

Did the facility submit a Tier II to the LEPC and local fire department? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 02/17/2023

INSPECTION ENTRY:

Peter Phillips led the inspection entry. The EPA Inspection Team (EPA) met with facility representatives Pam Simonson, Chris Phillips, and Kelvin Smith at the Wilber-Ellis facility in Fairfield, Washington. Assistant Fire Chief Devin Billington of Spokane County Fire District 2 accompanied EPA during the inspection. EPA arrived at the facility at 0815 hours and was joined by the following facility personnel:

Name	Title, Organization
Pam Simonson	EHSS Regional Manager/Wilber-Ellis
Chris Phillips	Operations Manager/Wilber-Ellis
Kelvin Smith	Service/Wilber-Ellis

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

If Yes, Name and Title of Representative: Devin Billington
Assistant Fire Chief

The facility is a first responder: No ☒ Yes ☐

If No, Responding Agency: Spokane County Fire District 2

Facility representatives escorted EPA to a conference room located in the facility's office building. Lead Inspector Peter Phillips, introduced all parties present, provided a summary of the Risk Management Program (RMP), and explained the purpose of the visit. Each EPA Inspector 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. Boots, and Safety high visibility vests are required. Chris/Pam 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 RMP rule a Program Level 2 facility and is owned and operated by Wilber-Ellis Company. The facility is a retail shop which sells fertilizer, pesticides, and herbicides to farmers. Product arrives at the facility via delivery truck and is transferred to tanks on site. The retail shop is regulated under RMP rule as a Level 2 Process facility maintaining 210,000 pounds of anhydrous ammonia, and currently maintains one 30,000-gallon capacity tank of anhydrous ammonia on site. The facility also chemicals regulated under EPCRA rule, including 9,000 gallons of aqueous ammonia (20% concentration) managed in two above ground tanks, and stores pesticides and herbicides regulated under EPCRA rule in a small warehouse on site.

There are twelve full-time employees on site, five of whom are operators. The facility is open from 0700 to 1600 hours Monday through Friday, and offers extended retail hours and days from September through November.

ON-SITE OBSERVATIONS:

EPA toured the facility from approximately 0815 to 1000 hours, escorted by facility representatives Chris Phillips, Kelvin Smith, and Pam Simonson. EPA observed exterior areas of the retail operation including the propane tank, the anhydrous and aqueous ammonia tanks, containment berm, piping, controls, and the small warehouse string EPCRA regulated chemicals.

EPA observed the EPCRA regulated tanks of 20% aqueous ammonia and associated product transfer system components. The tanks feature hazardous communication (HAZCOM) signage and placarding and are surrounded by a concrete dike providing secondary containment (photos 1-3). An adjacent paved product transfer area allows trucks to transfer aqueous ammonia to and from the tanks for product shipping and receiving (photos 3-4). Wilbur Ellis stages delivery fleet trucks adjacent to the aqueous ammonia tanks (photo 5). The product transfer system includes two pull-cable emergency stops (photos 6-7), and two pump on/off controls (photos 8-9).

EPA inspected the RMP-regulated anhydrous ammonia tank and associated product transfer system components. The anhydrous ammonia tank is directly adjacent to the aqueous ammonia tanks, and includes hazcom placarding and signage (photos 10-11), four pressure relief valves (PRVs) (photo 12) and the ammonia transfer system piping and header assembly (photos 14-15). Pressure relieve valve certifications are current, and due for recertification in 2024. EPA observed several safety measures in place including protective concrete traffic barriers surrounding the tank (photo 13), an emergency shower and eyewash station (photo 16), emergency open-top water tank and post-mounted respirator storage

(photo 17), truck wheel chocks (photo 18), and the facility flag which serves as a windsock (photo 19).

EPA inspected a small warehouse on site where the facility stores EPCRA-regulated chemicals. The warehouse exterior displayed safety and HAZCOM signage (photo 20) and EPA observed chemicals as neatly stored on pallets within the warehouse (photos 21 - 23). There is one emergency eyewash station in the warehouse (photo 24).

After touring the RMP-covered process areas at the facility, EPA returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to Ty Little, James Paradis, and Pam Simpson.

INFORMATION COLLECTED FROM FACILITY:

1. Aerial site plan map
2. Employee SOP Training Log
3. Emergency Incident Task Completion Sheet (page J-5)
4. Emergency Incident Task Completion Sheet (page J-6)

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

1. **Training:** Did not provide refresher training at least every three years, or 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 [68.54(b)]
2. **Compliance Audits:** The July 2021 compliance audit report was not signed and certified by the EHS manager in 2021. [68.58(a)]. The EHS Manager signed the audit report on July 14, 2023, two years after the audit report was completed.
3. **Emergency Response:** There is no written documentation for emergency response coordination activities in last five years. [68.93(c), 68.96(a)].

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.

1. No follow-up documents were requested during the inspection.

INSPECTION REPORT CERTIFICATION:

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

PETER PHILLIPS
(Affiliate)

Digitally signed by PETER
PHILLIPS (Affiliate)
Date: 2023.10.31 13:08:36 -07'00'

Inspector Signature

JAVIER MORALES

Digitally signed by JAVIER
MORALES
Date: 2023.10.31 14:59:21 -07'00'

RMP Coordinator/Approval

ERIN WILLIAMS Digitally signed by ERIN WILLIAMS
Date: 2023.11.06 15:07:48 -08'00'

EPCRA Coordinator/Approval

**MATTHEW
QUARTERMAN** Digitally signed by MATTHEW
QUARTERMAN
Date: 2023.11.07 06:24:09 -08'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: Wilber-Ellis Company

City, State: Fairfield, WA

Photographer: Mike Wolski

File	Photo Layout ID	Date	Time	Description
Photo1.jpg	1	7/14/2023	8:30 AM	Facility Exterior; Aqueous ammonia tanks and secondary containment, product transfer area, and fleet staging area
Photo2.jpg	2	7/14/2023	8:30 AM	Facility Exterior; Aqueous ammonia tanks with emergency stop
Photo3.jpg	3	7/14/2023	8:30 AM	Facility Exterior; Aqueous ammonia product transfer area
Photo4.jpg	4	7/14/2023	8:30 AM	Facility Exterior; Aqueous ammonia transfer system piping and valves
Photo5.jpg	5	7/14/2023	8:30 AM	Facility Exterior; Wilbur Ellis delivery truck fleet staging area
Photo6.jpg	6	7/14/2023	8:30 AM	Facility Exterior; First of two pull-cable emergency stops for ammonia transfer system
Photo7.jpg	7	7/14/2023	8:35 AM	Facility Exterior; Second of two pull-cable emergency stops for ammonia transfer system
Photo8.jpg	8	7/14/2023	8:35 AM	Facility Exterior; First of two pump ignition/off stations
Photo9.jpg	9	7/14/2023	8:35 AM	Facility Exterior; Second of two pump ignition/off stations
Photo10.jpg	10	7/14/2023	8:45 AM	Facility Exterior; Anhydrous ammonia tank and fire extinguisher
Photo11.jpg	11	7/14/2023	8:45 AM	Facility Exterior; Anhydrous ammonia tank
Photo12.jpg	12	7/14/2023	8:45 AM	Facility Exterior; Pressure relief valves (PRVs) for anhydrous ammonia tank
Photo13.jpg	13	7/14/2023	8:45 AM	Facility Exterior; Tank saddle, and concrete traffic protection barriers
Photo14.jpg	14	7/14/2023	8:45 AM	Facility Exterior; Anhydrous ammonia tank transfer system piping
Photo15.jpg	15	7/14/2023	8:45 AM	Facility Exterior; Anhydrous ammonia loading/unloading header assembly
Photo16.jpg	16	7/14/2023	8:45 AM	Facility Exterior; Emergency shower and eye wash station
Photo17.jpg	17	7/14/2023	8:45 AM	Facility Exterior; Emergency open water tank and respirator storage in post-mounted tan cas
Photo18.jpg	18	7/14/2023	8:45 AM	Facility Exterior; Wheel chocks
Photo19.jpg	19	7/14/2023	8:50 AM	Facility Exterior; The facility uses flags as windsocks
Photo20.jpg	20	7/14/2023	9:00 AM	Facility Exterior; Safety placards for EPCRA chemical warehouse
Photo21.jpg	21	7/14/2023	9:00 AM	Chemical Storage Warehouse; EPCRA chemicals in warehouse
Photo22.jpg	22	7/14/2023	9:00 AM	Chemical Storage Warehouse; EPCRA chemicals in warehouse
Photo23.jpg	23	7/14/2023	9:00 AM	Chemical Storage Warehouse; EPCRA chemicals in warehouse and fire extinguisher
Photo24.jpg	24	7/14/2023	9:00 AM	Chemical Storage Warehouse; Emergency eye wash station