

United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report

ADM Milling Co.
Chattanooga, Tennessee
March 29, 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 flour bleaching process at the ADM Milling Co. facility located in Chattanooga, Hamilton County, Tennessee. This facility was selected for inspection because it has never been inspected under the RMP. The inspection, which was conducted on March 29, 2022, consisted of a discussion of and request for program documentation, as well as a site review of various aspects of facility operations. Personnel from the facility participated throughout the inspection. Documents were provided for review. This report will provide a background of the facility and a listing of observations.

2.0 Background

The ADM Milling Co. facility is located in Chattanooga, Tennessee. This facility uses chlorine for flour bleaching purposes. Chlorine is added to enhance the color and baking performance of flour. The process is regulated as program level 3. According to facility records, the facility has the capacity for a maximum of 16,000 pounds of chlorine on site. The chlorine 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: Jordan Noles, EPA
Inspector-In-Training: Chetan Gala, EPA
Date of Facility Visit: March 29, 2022

Facility Identification

Name: ADM Milling Co.

Street Address: 1120 King Street

City: Chattanooga County: Hamilton State: Tennessee Zip: 37403

EPA Facility ID No: 1000 0006 9276

Dun & Bradstreet (D&B) No: 3332939

Latitude: 35.042222

Longitude: -085.305833

Name, address and phone of corporate parent company:

Owner/Operator: ADM Milling Co.

Mailing Address: 1120 King Street

City: Chattanooga State: Tennessee Zip: 37403

Phone: (334) 793-6003

Name, title, and email of person responsible for 40 C.F.R. Part 68 implementation:

Name: Charlie Bell

Title: Plant Manager

Email: Charlie.Bell@adm.com

Name and title of emergency contact:

Name: Charlie Bell

Title: Plant Manager

Day phone: (423) 756-0503

24-hour Phone: (423) 680-1141

Email: Charlie.Bell@adm.com

Name and titles of stationary source personnel involved in site inspection (*accompanied site tours, provided documents and explanations*):

Name: Amber Duckworth

Title: EHS Manager

Phone: (423) 304-1769

Email: Amber.Duckworth@adm.com

Name: Rusty Robertson

Title: Maintenance Supervisor

Phone: (423) 595-3097

Email: Russell.Robertson@adm.com

Note: This is a union facility.

Date and Program Levels of Submitted Risk Management Plan

Date of initial submission: March 29, 2019

Process as reported in RMP: Bleaching

Process: Bleaching

Process ID: 1000098410

Program Level as reported in RMP: 3

NAICS code: 311211 (Flour Milling)

3.0 Observations

The inspection of the ADM Milling Co. 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 began with an opening discussion of facility operations. EPA inspectors requested paperwork associated with the facility’s Risk Management Plan (RMPlan) . The documents were reviewed by EPA inspectors on-site and later off-site. The discussion was followed by a tour of the facility’s flour bleaching process. An inspection out-brief was conducted where EPA inspectors described their observations. There were no findings of note as a result of the inspection.

Inspection Report,

Prepared by:

JORDAN NOLES

Digitally signed by JORDAN

NOLES

Date: 2022.05.23 15:35:11 -04'00'

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

Date

Approved by:

JASON DRESSLER

Digitally signed by JASON

DRESSLER

Date: 2022.05.24 07:17:33 -04'00'

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

Date