

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 1

EPCRA, CERCLA, and CAA § 112(r) Inspection Report

Date: November 8, 2021
From: Tyler Diercks and Andrew Meyer, USEPA Enforcement Officers
Through: Mary Jane O'Donnell, Chief
Waste and Chemical Compliance Section
To: File
Subject: Chemical Accident Investigation and Inspection, under Clean Air Act (CAA) § 112(r), Emergency Planning and Community Right-To-Know Act (EPCRA) §§ 302-312, and CERCLA § 103 of White River Junction Rail Bulk Plant, White River Junction, VT.

GENERAL INFORMATION

Facility Name: White River Junction Rail Bulk Plant
EPA Facility Identifier: 100000216839
Address: 81 Roundhouse Road
White River Junction, VT 5001
Inspector Names: Tyler Diercks, EPA Region 1
Andrew Meyer, EPA Region 1
Andrew Loll, Eastern Research Group, Inc. (ERG)
Inspection Date: August 3, 2021
Type of Inspection: CAA Section 112(r)/EPCRA Compliance Evaluation Inspection
Purpose of Inspection: This inspection was conducted as a routine Section CAA 112(r)/EPCRA compliance evaluation inspection. This report identifies observations and findings made by the EPA inspection team during the follow-up inspection with respect to compliance with the CAA Section 112(r) and EPCRA requirements.
Current Owner: Highlands Fuel Delivery, LLC
Current Operator: Irving Energy Distribution and Marketing (IDEM)
Primary NAICS codes: 424710 (Petroleum Bulk Stations and Terminals)
Number of full-time employees: 2 FTEs

Estimated Annual Sales: Unknown

I. GENERAL FACILITY DESCRIPTION

IDEM operates the White River Junction Rail bulk propane distribution facility (WRJR or Facility) located in White River Junction, VT. The Facility consists of a railroad siding off the main rail line with storage for liquified propane gas (LPG) rail cars. Two LPG transfer stations (north and south) unload the contents of the railcars into the 60,000-gallon storage tank at the Facility. The LPG is then loaded into transport trucks at two bulkhead stations for delivery to propane distributors or smaller company-owned terminals. A small office building and an electrical shed that houses electrical switch boards are located at the south end of the facility. The railcar and truck unload stations, bulk storage tank, and associated piping is surrounded by chain link fencing. Two stationary fire monitors are located at the north and south ends of the bulk storage tank. The south fire monitor is located outside the fence. The north fire monitor is located inside the secured fence perimeter. Water is supplied to the fire monitors by a dry header where the fire department can connect a water supply approximately 450 feet from each of the monitors.

Roundhouse Road runs along the south and west side of the Facility and is open to the public. A neighboring business, RSD Leasing, is located across the road from the Facility. Additionally, IDEM operates another bulk storage facility located to the north of the WRJR Facility along the rail siding. Facility representatives stated that site is unrelated to the bulk propane facility.

The WRJR Facility’s RMP submission was last updated on February 9, 2017 prior to the inspection. The Facility stores a maximum of 201,600 pounds of propane on site per their reporting year 2020 Tier 2 submission.

II. IN-BRIEF/OPENING CONFERENCE

The EPA inspection team comprising Tyler Diercks and Andrew Meyer, EPA inspectors, and Andrew Loll, Eastern Research Group, Inc. (ERG) contract inspector, entered the Facility at approximately 8:30 a.m. Tom Peltier, Fire Marshal with the Hartford Fire Department, also participated in the inspection. The inspection team presented identification to Kyle Welch, Irving US Bulk Plant Manager, during the opening conference in the administrative office area. Inspector Diercks conducted the opening meeting and explained the reason and scope of the inspection.

Inspector Diercks presented the EPCRA Notice of Inspection to Mr. Welch, who signed as the Recipient of the Notice. Mr. Welch did not attempt to deny facility entry to the inspectors. Mr. Welch did not claim any information as Confidential Business Information (CBI). Facility employees are not represented by a union.

Facility Representatives:

Name	Title/Company	Phone Number	E-mail
Kyle Welch	US Bulk Plant Manager, Irving	603-359-3076	Kyle.Welch@Irvingoil.com
Jesse Howe	Bulk Plant Operator, Irving	603-765-9102	Jesse.Howe@Irvingoil.com
Kristen Fournier	EHS Coordinator, Irving	603-531-8454	Kristen.Fournier@Irvingoil.com

Inspector Diercks shared the following guidance documents with facility representatives:

1. EPCRA Fact Sheet (EPA 550-F-12-002, September 2012)
2. List of Lists (EPA 550-B-15-001, March 2015)

3. Small Business Resource Information Sheet (EPA 300-B-15-001, May 2015)
4. *National Response Center Oil and Chemical Spill Reporting* flyer
5. *Chemicals in Your Community* brochure (EPA 550-K-99-001, December 1999)

Inspector Diercks stated that after the opening meeting, the inspectors would do a walk-through inspection of the Facility's covered process and all other facility areas. He stated that the inspection team would be taking photographs of items and areas of interest and a copy of all photographs taken would be sent to the Facility representative after the inspection.

III. PHYSICAL INSPECTION

The EPA inspection team conducted a physical walkthrough of the Facility including the Loading/Unloading Stations and Bulk Storage Tank area, the Electrical shed, and the fire water system dry header. Inspector Loll took a total of 46 digital photographs during the one-day inspection to provide reference documentation of conditions observed. The photographs are referenced throughout the document. EPA identified the following areas of concern based on the walkthrough of the Facility:

- The local unload system emergency shutoff switches were not labeled to identify function (see Photographs 12 and 14 for the south railcar unload station and south truck load station switches, respectively).
- One nitrogen compressed gas cylinder was freestanding and not secured near the south emergency shutoff switch (see Photograph 13).
- None of the fences or buildings around the Facility contained legible NFPA hazard diamonds. The Facility had NFPA diamond placards posted next to the cantilever gates at the north and south entrances, but the font size was too small to read from a distance and the NFPA hazard ratings were empty (see Photographs 15 and 37).
- Sections of piping were missing labeling to indicate contents and direction of flow and one section of LPG piping had an ambiguous "Methanol" in the area where the methanol addition point was located, but label was on the LPG pipe itself. The piping was painted orange to signify LPG vapor and yellow to signify LPG liquid, but there was no legend to identify this convention (see Photographs 21, 27, 30, and 34 for examples).
- No safety showers or eyewash stations are located at the facility. The one portable eyewash station at the site is located inside the electrical shed which is normally locked. Additionally, the water bottle was missing from the eyewash holder (see Photograph 42).
- There were no windsocks present around the buildings or site to indicate the prevailing wind in the event of a release.

IV. OUT-BRIEF/CLOSING CONFERENCE

Inspector Diercks scheduled and concluded the inspection with a virtual out-brief Microsoft Teams meeting on August 24, 2021 with facility representatives, discussing the preliminary areas of concern identified during the inspection.

The following areas of concern were identified during the inspection:

1. NFPA hazard diamonds on fence around bulk flammables storage area and unload stations are too small to read from a distance and the NFPA diamonds are missing hazard ratings.

2. No windsocks around building or near the bulk storage and load/unload stations.
3. Sections of piping were missing labeling to indicate contents and direction of flow and one section of LPG piping had an ambiguous "Methanol" in the area where the methanol addition point was located, but label was on the LPG pipe itself.
4. No safety showers or eyewash stations at the facility. The one portable eyewash station at the site is location inside the electrical shed which is normally locked.
5. The local unload system emergency shutoff switches were not labeled to identify function.

V. FACILITY COMPLIANCE STATUS AND ELEMENTS OF PROOF - EPCRA

EPCRA Section 302

(1) Does facility have on-site, at any one time, extremely hazardous substances (EHS) at or above the TPQ? No.

(2) List or obtain documentation: Inspectors' observations

(3) How was maximum quantity on-site determined or calculated? Facility only maintains bulk storage of propane at the facility. Inspectors did not observe bulk storage of other chemicals at Facility.

EPCRA Section 303

(1) Facility Coordinator identified per Sec. 303 and date LEPC was notified? No documentation provided.

EPCRA Section 311

(1) Is facility required to maintain MSDSs under the OSHA Hazard Communication Standard 29 CFR 1910.1200 (no specific chemical list)? Yes

(2) Has the facility conducted a comprehensive audit to identify MSDS chemicals on-site and to determine if 500 lb./10,000 lb./TPQ thresholds were exceeded? Unknown.

(3) List of OSHA chemicals manufactured, processed, used/stored, and obtained? Unknown.

(4) How were the maximum amounts determined? Unknown.

(5) Section 311 info supplied to the:

SERC (Y/N):	<u>Unknown.</u>
LEPC (Y/N):	<u>Unknown.</u>
Local Fire Department(Y/N):	<u>Unknown.</u>
Date	<u>Unknown.</u>
Chemical List	<u>Unknown.</u>
MSDSs	<u>Unknown.</u>

(6) Have any new hazardous chemicals, mixtures, or substances been introduced into the facility in the last 5 years? No.

(7) If yes, has the facility submitted updated lists or MSDSs? N/A

EPCRA Section 312 (due March 1 of year following reporting calendar year)

(1) Was Tier II form submitted for all required chemicals? Yes

(2) What procedures are used to update Section 312 information for annual submittal and to ensure additional or new chemical data is submitted within 90 days? Unknown

(3) Was facility aware of annual reporting requirements under Section 312? Unknown

(4) Had the facility completed and signed a list of all reportable chemicals on site on date of the inspection? Yes

(5) Table of EPCRA 312 Reportable Substances:

CAS #	Chemical	Approx. Max. Wt. on Site (Lbs.)	TPQ (Lbs.)	Approx. Ratio (Actual/TPQ)
74-98-6	Propane	214,200	10,000	21.4

VI. ENFORCEMENT HISTORY

The Facility has no reported violations in ECHO.

VII. ENVIRONMENTAL JUSTICE

The national EJSCREEN mapping tool indicates that the Facility is not located in area of Environmental Justice interest.

ATTACHMENT A

Google Earth Image of the White River Junction Rail Bulk Plant



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