

**CLEAN AIR ACT (CAA) § 112(r)(7)
&
EMERGENCY PLANNING, COMMUNITY RIGHT-TO-KNOW ACT
(EPCRA) § 312
INSPECTION REPORT**

Lineage Logistics-Henderson

Facility Name and Address: Lineage Logistics-Henderson 8001 East 88th Street Henderson, Colorado 80640 Contact/Telephone: Max Harden (303) 288-7211 Mailing Address: 46500 Humboldt Drive Novi, California 48377	Date of Inspection: 7/16/2024 RMP EPA ID #: 1000 0018 9921 • Program Level: 3 • Covered Substances: ○ Anhydrous Ammonia TRIFID #: Facility does not TRI-report NAICS: 49312 # Employees at this location: 144
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INTRODUCTION

This report presents the observations of the CAA section 112(r)(7) and EPCRA section 312 inspection conducted by EPA Region 8. The purpose of this inspection was to determine compliance with the Risk Management Plan (RMP) requirements of CAA section 112(r)(7) and the Tier II reporting requirements of EPCRA section 312.

Lineage Logistics-Henderson (LLH) uses, handles, and/or stores more than the threshold quantity of Anhydrous Ammonia. Anhydrous Ammonia is regulated, as specified at 40 C.F.R. §§ 68.115 and 68.130.

CAA 112(r)(7) Program Elements Reviewed:

1. Applicability [68.10]
2. OCA/ACS [68.20 – 68.42]
3. Process safety information [68.65]
4. Process Hazard Analysis [68.67]
5. Operating procedures [68.69]
6. Training [68.71]
7. Mechanical integrity [68.73]
8. Management of Change [68.75]
9. Pre-startup safety review [68.77]

10. Compliance audits [68.79]
11. Incident investigation [68.81]
12. Employee participation [68.83]
13. Hot work permit [68.85]
14. Contractors [68.87]
15. Emergency Response [68.90 – 68.96]
16. Risk Management Plan [68.150 – 68.195]

Nature of Business:

LLH is a refrigerated-warehousing-and-storage facility.

OBSERVATIONS

CAA § 112(r)(7) (RMP):

1. Requirement found at Subpart D - Prevention Program – Process Safety

Information [40 CFR 68.65(d)(1)(vi)]: The Process Safety Information shall include design codes and standards employed.

- *LLH lists the “Mechanical Code” as a code that LLH employs*
- *However, LLH could not specify which mechanical code was referred to*
- *After a phone call to their corporate office, LLH determined that the code in question was the “International Mechanical Code”*
- *LLH should therefore change the generic “Mechanical Code” to the specific “International Mechanical Code” in their list of design codes and standards employed.*

Note: LLH is one of many RMP facilities that are owned by Lineage Logistics, LLC (LLLLC). LLH or LLLLLC should ensure that LLH’s sister facilities make the same change, as noted above, if applicable.

2. Requirement found at Subpart D - Prevention Program – Process Safety

Information [40 CFR 68.65(d)(2)]: The owner or operator shall document that equipment complies with recognized and generally accepted good engineering practices (RAGAGEP).

- *The ammonia piping is not labeled at Evaporator (EV) 37 and at Evaporator (EV) 38. These evaporators are located at the south dock of the Process-2 warehouse.*
- *Section 5.14.6 of ANSI/IIAR 2-2021, Standard for Design of Safe Closed-Circuit Ammonia Refrigeration Systems requires that such piping be labeled*

- *LLH should therefore label the piping as specified in ANSI/IIAR 2-2021.*

3. Requirement found at Subpart D - Prevention Program – Process Safety Information [40 CFR 68.65(d)(2)]: The owner or operator shall document that equipment complies with recognized and generally accepted good engineering practices (RAGAGEP).

- *Many egress doors in LLH's three ammonia-machinery rooms do not contain panic hardware*
- *Section 6.10.2 of ANSI/IIAR 2-2021, Standard for Design of Safe Closed-Circuit Ammonia Refrigeration Systems requires that panic hardware be installed on such doors*
- *LLH should therefore install the panic hardware.*

Note: LLD is aware of the missing panic-hardware and has noted the problem in their 2023 Process Hazard Analysis. LLH plans to install the hardware.

4. Requirement found at Subpart D - Prevention Program – Incident Investigation [40 CFR 68.81(d)(2)]: The Incident Investigation report shall include the date that the investigation began.

- *LLH does not include the date that the investigation began in their Incident Investigation reports. However, LLH does include the "date reported" in the reports.*
- *The date that the investigation began can be documented, in a roundabout way, by reviewing emails associated with each incident, but the reports, themselves, do not document the date*
- *The EPA therefore recommends that LLH add the date that the investigation began to their Incident Investigation reports.*

5. Requirement found at Subpart E – Emergency Response [40 CFR 68.93(a)]: The owner or operator of a stationary source shall coordinate response needs with local emergency planning and response organizations to determine how the stationary source is addressed in the community emergency response plan and to ensure that local response organizations are aware of the regulated substances at the stationary source, their quantities, the risks presented by covered processes, and the resources and capabilities at the stationary source to respond to an accidental release of a regulated substance.

- *According to LLH, the local fire department and the local LEPC are very difficult to deal with. For this reason, LLH cannot effectively coordinate response needs with the 2 organizations.*

- *The EPA recommends that LLH attempt to establish a rapport with the 2 organizations so that response needs can be coordinated.*

Item of Note:

Many trip/fall hazards exist on the roof of LLH. These hazards are associated with the installation of an exceptionally large photovoltaic panel array. The array, which is not owned by LLH, is being installed by a third party. LLH will receive generated power from the array at a discounted rate.

Hazards are mostly caused by electrical conduits and a relocated, metal stairway. The conduits, which connect the photovoltaic panels, pass over designated walking paths, creating significant trip hazards, especially if covered by snow.

The stairway, which spans the elevation change between the original building and a newer addition, has been moved northward, resulting in an 8" gap between the upper roof and the top tread of the stairway. This gap creates a serious fall hazard, especially if covered by snow.

LLH is aware of the above hazards and will have to negotiate with the owner of the array to determine whether the owner or LLH will be responsible for mitigating the hazards.

EPCRA § 312:

Nothing of note from observations.

INSPECTION REPORT REVIEW RECORD		
		<i>Date:</i>
<i>Author:</i>	<i>Toxics and Pesticides Enforcement Section Inspector</i>	<i>7/23/2024</i>
<i>Final Reviewer:</i>	<i>Section Supervisor</i>	<i>8/2/2024</i>