United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report

Russellville – Reliance Ag
Russellville, Kentucky
October 22, 2024

1.0 Introduction

Several planning and legislative initiatives are part of the U.S. Environmental Protection Agency's (EPA) efforts to reduce the likelihood and severity of chemical accidents. These include the National Contingency Plan, the Emergency Planning and Community Right-to-Know Act, 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 as mandated by Section 112(r)(7) of the CAA.

The focus of this inspection is the Risk Management Program for the anhydrous ammonia storage and distribution process operation at the Russellville, KY - Reliance Ag, LLC (Reliance) facility located in Russellville, Kentucky. This facility was selected for inspection based on geographic location and because it had not been inspected under the Risk Management Program in over five years by EPA. The inspection, which was conducted on October 22, 2024, consisted of an examination of program documentation as well as site reviews of Reliance's anhydrous ammonia storage and distribution operation. Two (2) or more Reliance personnel participated in the inspection. This report provides background of the Reliance's facility and a listing of the observations.

2.0 Background

The Reliance's facility is located at 333 Water Melon Road, Russellville, Logan county, Kentucky, 42276. Hopkinsville Elevator Co., Inc. wholly owns Agri-Chem LLC., that operates as Reliance Ag, LLC. Reliance is therefore wholly owned by Hopkinsville Elevator Co., Inc. Reliance is a co-op that stores, transfers, distributes, and sales anhydrous ammonia, fertilizers, chemicals, seeds, feeds and related services to agri-business industry as retailer and wholesaler. Reliance's anhydrous ammonia process is regulated as program level 2 and subject to the Risk Management Program requirements of 40 CFR 68 under CAA 112(r) and EPCRA requirements. The background specifics are summarized as follows in Table 1.

TABLE 1: Inspection Information Summary

Inspection Team

Inspector: Chetan Gala and Callie Sotolongo
Date of Inspection Visit: October 22, 2024

Facility Identification

Name: Russellville – KY, Reliance Ag, LLC. Street Address: 333 Water Melon Road
City: Russellville County: Logan State: Kentucky Zip: 42276
EPA Facility ID No: 1000 0021 3967
Latitude: 36.799776
Longitude: -086.955307
Phone: (270) 725-4500

Name, title, and email of person responsible for 40 CFR Part 68 implementation:
Name: David Buchanan
Title: General Manager
Email: dbuchanan@agrichemky.com

Name and title of emergency contact:
Name: Jason Outland
Title: EHS Director
Phone: (270) 886-5191
Emergency Contact 24-Hour Phone: (270) 348-5003
Email: joutland@hop-elevator.com

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

Name	Title	Phone	Email
David Buchanan	General Manager	270-725-4500	dbuchanan@agrichemky.com
Jason Outland	EHS Director	(270) 886-5191 (270) 348-5003	joutland@hop-elevator.com
Tony Stratton	Site Manager	(270) 725-4500	tstratton@relianceag.com

Note: Facility representative indicated that this facility is a non-union facility.

Date and Program Levels of Submitted Risk Management Plan

Date of initial submission: 2/14/2011
Date of recent submission: 6/10/2024

Process ID	Process Description	Process Chemical ID	Process Program Level	Chemical Name	Quantity (lbs)	NAICS code	Flammable / Toxic
1000139157	Storage and Transfer	1000174240	Level 2	Ammonia (anhydrous) 7664-41-7	68,000 lbs.	Process NAIC Code: 1000140669 NAIC Code: 42491 NAIC Description: Farm Supplies Merchant Wholesalers	Toxic

3.0 Observations

The inspection of Reliance evaluated various sections of the Risk Management Program (RMP) regulations at 40 CFR Part 68, Program Level 2. The inspection included discussions with the facility representatives regarding the operation of its Anhydrous ammonia process, RMP, a review of paperwork associated with RMP, and a tour of the facility. An inspection in-brief and out-brief were conducted. Observations from the RMP inspection are presented below:

1. 40 CFR 68.48(a) requires the owner or operator to compile and maintain up-to-date safety information related to the regulated substances, processes, and equipment such as:

   (1) Safety Data Sheets (SDS) that meet the requirements of 29 CFR 1910.1200(g);
   (2) Maximum intended inventory of equipment in which the regulated substances are stored or processed;
   (3) Safe upper and lower temperatures, pressures, flows, and compositions;
   (4) Equipment specifications; and
   (5) Codes and standards used to design, build, and operate the process.

   ➢ The nameplate on anhydrous ammonia tanks were not legible.

   - American National Standard Institute (ANSI)/Compressed Gas Association (CGA) G-2.1-2014, section 5.4.1 requires in part that the nameplate must be maintained in legible condition.

2. 40 CFR 68.48 (b) The owner or operator must ensure and document that the process is designed in compliance with recognized and generally accepted good engineering practices.

   ➢ Inspectors did not observe any legible emergency information signage with required language displayed on the fencing of the anhydrous ammonia storage tanks on the premises that could be readily visible to emergency response personnel.

   - ANSI/CGA G-2.1-2014, section 6.8 states “A legible sign shall be displayed on the premises at which a storage system is located, so as to be readily visible to emergency response personnel, with lettering not less than 2 inches in height, stating the following:

     - phrase "EMERGENCY INFORMATION";

- name of facility;
- name or title of at least two responsible persons;
- area code and telephone number(s) of each person listed; and
- phrase, "the 911 address is", and the appropriate 911 address."

3. 40 CFR § 68.58(a) requires the owner or operator to certify that they have evaluated compliance with the provisions of this subpart, at least every three years to verify that the procedures and practices developed under this subpart are adequate and are being followed. When required as set forth in paragraph (f) of this section, the compliance audit shall be a third-party audit.

   ➢ The last two (2) compliance audits were conducted on December 18, 2018, and July 7, 2022, respectively. The interval between these audits was 3 years, 6 months, and 19 days.

Inspection Report,

Prepared by:

Gala, Chetan

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Date: 2024.12.17 17:15:01 -05'00'

Chetan Gala, Inspector Date
South Air Enforcement Section
Air Enforcement Branch
Enforcement and Compliance Assurance Division
U.S. EPA Region 4

Approved by:

TODD GROENDYKE

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Date: 2024.12.17 09:05:40 -05'00'

Todd Groendyke, Chief Date
South Air Enforcement Section
Air Enforcement Branch
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