



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604**

**DATE:** See Date of Section Chief Signature Below

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Co-Alliance, Rolling Prairie, Indiana

**FROM:** Jason Schenandoah, Environmental Engineer  
AECAB (IL/IN)

**THRU:** Nathan Frank, Section Chief  
AECAB (IL/IN)

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** Co-Alliance

**Facility Location:** 310 S Prairie Street, Rolling Prairie, Indiana 46371

**Date of Inspection:** July 28, 2021

**EPA Inspector(s):**

1. Jason Schenandoah, Environmental Engineer
2. Vicky Mei, Environmental Engineer
3. Silvia Palomo, Environmental Engineer

**Other Attendees:**

1. Shawn Lambert, Safety and Risk Manager
2. Josh Kandel, Safety and Risk Coordinator
3. Steve Mrozinski, Plant Manager

**Contact Email Address:** Shawn.Lambert@co-alliance.com

**Purpose of Inspection:** To ensure compliance with the Clean Air Act

**Facility Type:** Anhydrous ammonia fertilizer distribution facility

**Regulations Central to Inspection:** The Chemical Accident Prevention Provisions at 40 C.F.R. Part 68

**Arrival Time:** 9:00 am

**Departure Time:** 1:30 pm

**Inspection Type:**

- Unannounced Inspection
- Announced Inspection

**OPENING CONFERENCE**

- Presented Credentials
- Stated authority and purpose of inspection
- Provided Small Business Resource Information Sheet
- Small Business Resource Information Sheet not provided. Reason: Not a small business
- Provided CBI warning to facility

The following information was obtained verbally from Co-alliance personnel unless otherwise noted.

**Company Ownership:** Rolling Prairie Agronomy (Rolling Prairie) is owned by parent company Co-Alliance.

**Process Description:**

Rolling Prairie stores and sells anhydrous ammonia to farmers. Anhydrous ammonia is used as a crop production nutrient. Anhydrous ammonia is received via truck and is stored in a 30,000-gallon tank. Rolling Prairie owns approximately 40 anhydrous ammonia nurse tanks which are loaned to and used by farmers to transport and apply the ammonia to their crop. The nurse tanks range in size from 1000-gallon to 1500-gallon capacities. Nurse tanks are filled from the 30,000-gallon tank.

**Staff Interview:** Rolling Prairie typically sells ammonia to farmers during the months of March through July. The facility has 5 to 6 employees plus seasonal help during the busy season. The 30,000-gallon tank is 50 years old. The nurse tanks are recertified every 5 years by a contractor. Rolling Prairie is not a responding facility and the Bainbridge Fire Department provides emergency response services.

**TOUR INFORMATION**

**EPA Tour of the Facility:** Yes

**Data Collected and Observations:** EPA inspectors toured the facility with the facility's representatives. The anhydrous ammonia tank, the nurse tanks, and the riser were inspected. The

anhydrous ammonia storage tank and nurse tanks are located outside. The area is not fenced, and the storage tanks and nurse tanks are accessible without a key card or physical key. The storage tank is located close to the nurse tanks riser. The storage tank is labeled, and the paint is peeling on the bottom of the tank. The pressure relief valves are located on top of the tank and EPA inspectors did not check the replacement date on the valves. According to Mr. Steve Mrozinski, the valves were replaced recently. The storage tank does not have a remote emergency shutoff valve; a pull cable is used to stop the transfer operation of the anhydrous ammonia from the storage tank into the nurse tanks. There is one nurse tank riser. Anhydrous ammonia is transferred to the nurse tank riser by underground pipeline. The hoses on the risers are in good condition and current on their replacement date. The nurse tanks are stored in different location. Routine maintenance on the nurse tanks is performed after the busy season by the employees. Maintenance is not conducted on the liquid pumps. Pressure tests are not conducted on the nurse tank hoses. The 30,000-gallon storage tank is painted every 5 years. The facility relayed to EPA that the facility aims to paint 25 nurse tanks every year. At the storage tank, EPA inspectors detected ammonia gas odors. Structure tests were not conducted on the storage tank supports. There were no procedures to inspect the safety kits on the nurse tanks.

**Photos and/or Videos:** were taken during the inspection.

**Field Measurements:** were not taken during this inspection.

### **RECORDS REVIEW**

The following documents were provided via OneDrive upload prior to the inspection and were reviewed before and while on-site:

- Process Description
- Block flow diagram of the process
- Management structure
- Off-site Consequence Analysis
- Safety Information
- Hazard Review (July 10, 2019)
- Operating Procedures
- Training documentation
- Maintenance procedures
- Recent compliance audits (2015, 2018, and 2021)
- Emergency Response Plan

The following documents were provided during the inspection:

- State inspection findings (obtained)
- 5-year tank recertification (obtained)

Record review findings:

- The off-site consequences assessment did not include a list of environmental receptors, institutions, parks and recreational areas, and major commercial, office, and industrial buildings.
- Safety information did not include equipment specifications nor codes and standards used to design, build, and operate all process equipment
- The hazard review did not include specific hazards associated with anhydrous ammonia
- Maintenance procedures for the anhydrous ammonia storage tank, nurse tanks, and appurtenance need to be documented
- Training on operating procedures need to be conducted and documented every three years; the last training documentation provided during inspection was April 2018.
- No documentation of trucker training was available.
- Documentation of who the facility coordinates the emergency plan with is not recorded.
- The operating procedures are not tailored to the facility.

**CLOSING CONFERENCE**

- Provided U.S. EPA point of contact to the facility

**Requested documents:**

- Documentation of the last two pressure relief valve change out
- Operating procedures training after 2018

**Concerns:**

- Nurse tanks are located in a separate location from the storage tank need to be assessed as an additional process at the facility under the RMP.

**DIGITAL SIGNATURES**

Report Author: JASON SCHENANDOAH Digitally signed by JASON SCHENANDOAH Date: 2021.10.27 10:37:10 -05'00'

Section Chief: NATHAN FRANK Digitally signed by NATHAN FRANK Date: 2021.11.03 15:45:04 -05'00'



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**APPENDICES AND ATTACHMENTS**

- 1.* Appendix A: Digital Image Log

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**APPENDIX A: DIGITAL IMAGE LOG**

<b>1. Inspector Name:</b> Jason Schenandoah	<b>2. Archival Record Location:</b> EPA OneDrive
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<b>Image Number</b>	<b>File Name</b>	<b>Date and Time (incl. Time zone and DST)</b>	<b>Description of Image</b>
1	IMG_0002.JPG	2021:07:28 13:11:03	Riser distribution hose expiration date
2	IMG_0003.JPG	2021:07:28 13:11:13	Riser distribution hose expiration date
3	IMG_0004.JPG	2021:07:28 13:11:34	Riser distribution hose expiration date
4	IMG_0005.JPG	2021:07:28 13:11:57	Riser distribution hose expiration date
5	IMG_0006.JPG	2021:07:28 13:13:44	Tub of water near riser
6	IMG_0007.JPG	2021:07:28 13:14:30	Storage tank specification plate
7	IMG_0008.JPG	2021:07:28 13:14:38	Storage tank level indicator
8	IMG_0009.JPG	2021:07:28 13:15:15	Receiving hookups and cable pull
9	IMG_0010.JPG	2021:07:28 13:15:45	Storage tank pump and emergency cable pull
10	IMG_0011.JPG	2021:07:28 13:16:29	Tub of water near storage tank receiving
11	IMG_0012.JPG	2021:07:28 13:17:08	Exposed rebar in storage tank concrete stand
12	IMG_0013.JPG	2021:07:28 13:17:45	Emergency shutoff for storage tank
13	IMG_0014.JPG	2021:07:28 13:18:48	Peeling paint on underside of storage tank
14	IMG_0015.JPG	2021:07:28 13:20:48	Exposed rebar in concrete stand for storage tank and peeling paint
15	IMG_0016.JPG	2021:07:28 13:22:46	Close up of peeling paint and some corrosion
16	IMG_0017.JPG	2021:07:28 13:29:15	Nurse tank maintenance area
17	IMG_0018.JPG	2021:07:28 13:31:13	Safety kit and caution signs on nurse tank, some corrosion noted
18	IMG_0019.JPG	2021:07:28 13:32:12	Peeling label on nurse tank
19	IMG_0020.JPG	2021:07:28 13:32:44	Nurse tank 55 some corrosion noted

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20	IMG_0021.JPG	2021:07:28 13:34:48	Tank 7 corrosion under emergency kit
21	IMG_0022.JPG	2021:07:28 13:37:22	Tank 61 corrosion under emergency kit