



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

ENFORCEMENT &
COMPLIANCE ASSURANCE
DIVISION

Clean Air Act - Section 112(r)
Risk Management Program
and EPCRA 312 – Tier II
Facility Inspection Report

FACILITY INFORMATION:

Name: Univar Anchorage
Physical Address: 590 East 100th Avenue, Anchorage, AK 99515
Phone Number: (907) 529-6775
Latitude/Longitude: 61.13000/-149.872778
RMP Facility ID#: 100000218702
FRS ID#: 110000554196
EJ Concerns: Yes - Greater Than 80 Percent

CONTACT INFORMATION (RMP Implementation):

Name: Lowell Upton, Branch Operations Manager
Phone Number: (907) 529-6775
E-mail: lowell.upton@univarsolutions.com

EMERGENCY CONTACT INFORMATION:

Name: Lowell Upton, Branch Operations Manager
Phone (24-hr): (907) 529-6775
E-mail: lowell.upton@univarsolutions.com
Website: www.fruitsmart.com

TRIP DETAILS:

Inspection Date: 9/12/2023
Inspection Time: 09:00 through 13:45
Inspectors: Peter Phillips, US EPA Region 10 SEE Grantee, Lead RMP/EPCRA Inspector
Terry Garcia, US EPA Region 10 SEE Grantee, RMP/EPCRA Inspector
Edward Johannes, US EPA Region 10 SEE Grantee, RMP/EPCRA Inspector
Erin Williams, US EPA Region 10, EPCRA Program Coordinator

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: 11/15/2012
Date of Latest Update: 11/17/2022

Process (Program 1, 2, 3) as reported in RMP:

Process ID	Description	Process Chemical ID	NAICS Code	Program Level	Chemical Name CAS Number	Quantity (lbs)
1000128391	Products Merchant Wholesalers	1000160971	42469	2	Ammonia, Aqueous (7664-41-7)	40,000

PURPOSE:

The purpose of this inspection was to determine whether this facility is in compliance with Section 112(r) of the Clean Air Act and Title 40 Code of Federal Regulations (CFR) Part 68, Chemical Accident Prevention Provisions.

- The facility has been previously inspected in the past 5 years: No ☒ Yes ☐
If Yes, Date of Last Inspection:
- The facility is High Risk: No ☒ Yes ☐
- Joint EPCRA inspection: No ☐ Yes ☒

CAA TITLE V AIR PERMIT:

Does the facility have a CAA Title V Permit? No ☒ Yes ☐

If Yes, Permit Number

RELEASE/ACCIDENT HISTORY:

Did the facility have a reportable release in the past 5 years? No ☒ Yes ☐

If Yes, Date and Description of the Release:

EPCRA TIER II REPORTING:

Did the facility submit the [Enter Year] Tier II report to the SERC? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 1/30/2023 via E-Plan

Did the facility submit a Tier II to the LEPC and local fire department? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 1/30/2023 via E-Plan

INSPECTION ENTRY:

Peter Phillips led the inspection entry. The inspection team met with Lowell Upton at the Univar facility in Anchorage, Alaska. The team arrived at the facility at 9:00 am and was joined by the following facility personnel:

Name	Title
Jared Carling	Regulatory Manager
Lowell Upton	Operations Manager

Was a state/county/or local emergency representative present? No ☒ Yes ☐

If Yes, Name and Title of Representative:

The facility is a first responder: No ☒ Yes ☐

If No, Responding Agency Anchorage Fire Department

The inspection team was escorted to a conference room located in the facility's office building. Introductions were made by Peter Phillips, who provided a summary of the risk management program

(RMP) and explained the purpose of the visit. Each team member presented his/her credentials.

EPA then requested an explanation of the facility's operations and any additional safety measures that should be taken during the site tour. Mr. Upton gave a brief description of the facility, operations, and personal protective equipment required for the tour.

Prior to the inspection, EPA sent a certified notice of inspection letter to the facility informing them of the CAA Section 112(r)(6)(L) requirement that facility employees and employee representatives (such as a union representative) have the right to participate in the RMP inspection, and that a copy of the letter must be provided to the employee representative(s) and the letter posted in a manner accessible to employees in the facility.

The facility is unionized: No ☒ Yes ☐

If Yes, Name of Union

An employee representative present during the facility visit: No ☒ Yes ☐

If Yes, Name/Title

GENERAL INFORMATION:

Univar Solutions, USA Inc. was founded in 1924 and supplies chemical raw materials to the food industry, chemical compounders, pharmaceuticals, mining, forest products, oil and gas producers, electronics, coatings and many other key industries. The Univar Solutions, USA Inc. (Univar) facility located in Anchorage, Alaska is a wholesale chemical distributor serving various U.S. industries. The facility process is regulated under the Risk Management Program as a Program Level 2. The Anchorage facility's primary activities cover chemical storage and distribution. In their RMP dated November 17, 2022, Univar reported a regulated substance of aqueous ammonia (conc. 29%) that exceeds the threshold quantity of 20,000 pounds for ammonia (conc. 20% or greater).

A tanker railcar of aqueous ammonia (conc. 29%) is delivered from the Alaska Railroad yard to the site during a transfer operation. The tanker railcar contains approximately 173,000 lbs. (23,000 gallons) of aqueous ammonia (conc. 29%). The aqueous ammonia (conc. 29%) is transferred into 37,608-pound (5,000 gallon) ISO container for immediate delivery to their customers. The fixed transfer lines contain an estimated 150 lbs. (20 gallons) of aqueous ammonia (conc. 29%).

The facility contains a maximum of twenty 330-gallon Intermediate Bulk Containers (IBC) to store aqueous ammonia (conc. 29%) on site. The total quantity of aqueous ammonia (conc. 29%) stored is 49,639 pounds (6,600 gallons).

There are presently no modifications to the process.

ON-SITE OBSERVATIONS:

The facility tour was conducted from approximately 09:45 am to 10:15 am. The inspection team was escorted by Mr. Upton and Mr. Carling. The inspection team observed the following aqua ammonia process area and EPCRA chemical storage areas:

1. EPCRA interior chemical storage area
2. EPCRA interior flammable storage area
3. EPCRA exterior flammable area
4. EPCRA exterior chemical tank farm
5. EPCRA interior heated tank farm (20 tanks)
6. Rail spurs (A and B, RMP covered process)

EPCRA Observations:

The facility tour began with observation of the interior EPCRA chemical storage warehouse (photos 1-4). Chemicals were organized neatly on racks, and the floor was free of obstructions. A chemical compatibility chart (photo 5) was posted in this area, as well as in the interior and exterior flammable material storage areas. All flammable storage containers were properly labeled with hazard placards (photos 7-9).

The inspection team then proceeded to the exterior tank farm containing ethanol, kerosene, and aircraft deicing fluid tanks enclosed within a secondary containment wall (photo 10). No breaches in the containment wall were observed. An emergency shower and eye wash station were located outside (photo 16).

The tour continued to the heated interior tank farm comprised of twenty 15,000-gallon tanks for storage of EPCRA chemicals requiring regulated temperatures (photo 19). All tanks displayed National Fire Protection Association (NFPA) 704 hazard identification markings (photo 19).

RMP Observations:

The Risk Management Plan (RMP) covered process at the facility is the transloading of 29% aqueous ammonia from railcars into 330-gallon Intermediate Bulk Containers (IBCs). No railcars were present on site during the inspection. The inspection team observed the two rail spurs, labeled Spur A and Spur B, used for transloading (photo 13). The aqueous ammonia is offloaded from the railcar via a fixed transfer pump (photo 11). The facility requires three operators to perform the transfer with two safety spotters and one transfer operator. The product flows from flexible hoses into a fixed piping system and then into the IBCs (photo 12 and 13). Univar stated that their flexible hoses are tested annually and replaced every five years. An emergency shutdown button (photo 17) and emergency shower/eye wash station (photo 15) are located within the transfer area. The rail spurs are secured with a locking gate (photo 14).

Photographs were taken of the aqua ammonia transloading area and chemical storage area.

The photographs that were taken at the facility are included in Attachment A to this report.

After touring the RMP-covered process areas at the Univar Anchorage facility, the inspection team returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to Mr. Upton and Mr. Carling.

INFORMATION COLLECTED FROM FACILITY:

1. Business cards
2. Facility site plan
3. Fire department walk through email
4. Hazard Communication Visitor Checklist

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

1. **Hazard Review [68.50]:** Univar Anchorage could not produce a completed Hazard Review. The 2019 Hazard Review document dated 8/1/2019 was a partial review that did not include task assignments by name, due dates, and completion dates for eleven (11) open findings.

2. **Maintenance [68.56]:** Univar Anchorage could not produce written maintenance procedures identifying the recognized and generally accepted good engineering practices (RAGAGEP) being followed to maintain and inspect process equipment.
3. **Maintenance [68.56]:** Univar Anchorage could not produce training records for their personnel engaged in maintaining and inspecting process equipment.
4. **Maintenance [68.56]:** Univar Anchorage could not produce inspecting and testing documentation that process equipment (pumps and piping) were being maintained and inspected.

DOCUMENTS REQUESTED INCLUDED IN REPORT:

The following documents were requested during the inspection are included in this report. These documents were reviewed to determine compliance with Section 112(r) of the Clean Air Act.

1. Hazard Assessment documentation
2. Maintenance training records: The facility supplied a roster of personnel requiring general training subjects but did not specify details for maintenance and inspection training related to the covered process.
3. General maintenance policy
4. Inspection and testing records for pumps and piping: The facility provided a manual for the pump.
5. RAGAEPs for maintenance equipment and inspections: The facility provided general RAGAEPs for process equipment.
6. 2019 Hazard Review including tracking of open findings.

Univar Anchorage provided the documents listed above via mail on September 25, 2023.

INSPECTION REPORT CERTIFICATION:

This is to certify that I, Peter Phillips, was the lead inspector at this facility and that I have verified the accuracy of the observations in this inspection report:

PETER PHILLIPS
(Affiliate)

Digitally signed by PETER
PHILLIPS (Affiliate)
Date: 2024.01.12 13:26:19 -08'00'

Inspector Signature

JAVIER MORALES

Digitally signed by JAVIER
MORALES
Date: 2024.01.17 09:09:22 -08'00'

RMP Coordinator/Approval

ERIN WILLIAMS

Digitally signed by ERIN WILLIAMS
Date: 2024.01.16 11:26:17 -08'00'

EPCRA Coordinator/Approval

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: Univar Anchorage

City, State: Anchorage, AK

Photographer: Peter Phillips

File	Date	Time	Description
1	9/12/2023	9:46 AM	Chemical storage
2	9/12/2023	9:46 AM	Chemical storage
3	9/12/2023	9:47 AM	Chemical storage
4	9/12/2023	9:47 AM	Chemical storage
5	9/12/2023	9:49 AM	Chemical storage
6	9/12/2023	9:49 AM	Chemical storage bleach
7	9/12/2023	9:52 AM	Chemical storage flammables
8	9/12/2023	9:53 AM	Chemical storage flammables exterior
9	9/12/2023	9:54 AM	Chemical storage flammable exterior empty vessels
10	9/12/2023	9:56 AM	Tank farm with deicing fluid, methanol, and kerosene
11	9/12/2023	9:58 AM	Hoses from rail spur tested annually
12	9/12/2023	9:58 AM	Hoses from rail spur tested annually
13	9/12/2023	10:01 AM	Rail spurs, A and B
14	9/12/2023	10:02 AM	Rail spurs, A and B gate
15	9/12/2023	10:02 AM	Rail spurs, A and B emergency shower
16	9/12/2023	10:06 AM	Emergency shower at the tank farm
17	9/12/2023	10:06 AM	Emergency stop for aqua ammonia
18	9/12/2023	10:07 AM	OSHA fall restraint system.
19	9/12/2023	10:08 AM	Heated tank farm, 15,000 gallon (20 tanks)