

U.S. Environmental Protection Agency Region 4
Enforcement and Compliance Assurance Division

EPCRA Inspection Checklist/Inspection Report

Company Name	<u>Sanders Lead Company</u>	SIC/NAICS	<u>3341/331492</u>
Lead Inspector Name	<u>Mark Briggs</u>	Inspection Date	<u>4/30/24</u>
Inspection Team Members	<u>Brendan Scher</u>		

1. State purpose of the inspection and present credentials
2. Record names and titles of the facility representatives participating in the inspection.

Name Chris Rutherford Phone (334)-372-2507

Name Andrew Womack Phone (256)-717-4524

3. Obtain exact name and address of the facility being inspected, as well as any Parent Company information:

Facility Name: Sanders Lead Company

Address: 1 Sanders Road

County: Pike

Owner/Operator/Parent Company (Name, Address, Phone): Sanders Lead

How long owned/operated, recent sale of facility (date)? _____

4. Obtain/review facility description

a. Officers' names and titles N/A

b. Incorporation date and location N/A

c. Other facilities owned by the company N/A

d. Number of employees 496

e. Annual Corporate Sales N/A

f. Process Description and Process Diagrams Sanders Lead Company uses anhydrous ammonia to create ammonium sulfate products sold to the fertilizer industry

g. Jurisdictional Fire Department Fire District City of Troy

5. Compliance Review by Statute:

Inspection Identifier: CS – EPCRA04302024

Section 302

- | | | | |
|--|----------|---|-----|
| 1. EHSs present above TPQ? | <u>Y</u> | N | N/A |
| 2. Notification to SERC and LEPC of EHSs | <u>Y</u> | N | N/A |
| 3. Obtained list of inventory of EHSs | <u>Y</u> | N | N/A |

Section 303 (if subject to 302)

- | | |
|--|-----------|
| 1. Facility Emergency Coordinator | _____ |
| 2. Date identified to LEPC? | _____ N/A |
| 3. Emergency Contingency Plan submitted (date)? | _____ N/A |
| 4. Obtained copies of notification letters and verified mail return receipts, where appropriate? | |

Section 304/CERCLA 103

- | | | | |
|---|---|---|------------|
| 1. Has facility had reportable emergency release? | Y | N | <u>N/A</u> |
| 2. Release reported to: | | | |
| NRC? | Y | N | <u>N/A</u> |
| SERC/ Follow-up? | Y | N | <u>N/A</u> |
| LEPC/Follow-up? | Y | N | <u>N/A</u> |
| 3. Obtained copy of facility's incident report | Y | N | <u>N/A</u> |

Section 311

- | | | | |
|---|---|---|------------|
| 1. MSDS to SERC, LEPC, fire dept (Haz. Chem $\geq$ 10,000 lbs)? | Y | N | <u>N/A</u> |
| 2. MSDS to SERC, LEPC, fire dept (EHSs $\geq$ 500 lbs or TPQ)? | Y | N | <u>N/A</u> |
| 3. Obtained documentation of submissions? | Y | N | <u>N/A</u> |

Section 312

- | | | | |
|--|----------|---|-----|
| 1. Obtained chemical inventory list | <u>Y</u> | N | N/A |
| 2. View purchase records (where applicable) | <u>Y</u> | N | N/A |
| 3. Tier II reports to SERC, LEPC, fire dept (Haz. Chem $\geq$ 10,000 lbs)? | <u>Y</u> | N | N/A |
| 4. Tier II reports to SERC, LEPC, fire dept (EHSs $\geq$ 500 lbs or TPQ)? | <u>Y</u> | N | N/A |
| 5. Obtained documentation of maximum daily amounts stored? | <u>Y</u> | N | N/A |
| 6. Obtained MSDSs? | <u>Y</u> | N | N/A |
| 7. Obtained documentation of submissions? | <u>Y</u> | N | N/A |

Section 313

- | | | | |
|--|---|---|------------|
| 1. Form R/A to State and EPA for Toxic Chemicals: | | | |
| Manufactured, processed, and caused to be imported $\geq$ 25,000lbs, | | | |
| otherwise used $\geq$ 10,000 lbs | Y | N | <u>N/A</u> |
| 2. Obtained list of 313 chemicals MPOU at the facility | Y | N | <u>N/A</u> |
| 3. Obtained documentation of submissions? | Y | N | <u>N/A</u> |

Report Prepared By:

Inspection Identifier: CS – EPCRA04302024

Name (Printed): Callie Sotolongo

Title: EPCRA Inspector in training

Signature: CALLIE
SOTOLONGO Digitally signed by CALLIE
SOTOLONGO
Date: 2024.09.13 13:45:56
-04'00'

Report Authorized By:

Name (Printed): Todd Groendyke

Title: Chief, South Air Enforcement Section

Signature: TODD
GROENDYKE Digitally signed by TODD
GROENDYKE
Date: 2024.08.30 13:34:43 -04'00'