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

FACILITY INFORMATION:

Name:	CHS Inc.-Grangeville
Physical Address:	1001 North A Street P.O. Box 70 Grangeville, Idaho 83530
Phone Number:	(208) 983-0210
Latitude/Longitude:	45.934401, -116.125743
EPA Facility ID#	1000 0002 3583

CONTACT INFORMATION (RMP Implementation):

Name:	Peter Mutschler
Phone Number:	(208) 983-0210
E-mail:	co.compliance@chsinc.com

EMERGENCY CONTACT INFORMATION:

Name:	Joel Wasem
Phone (24-hr):	(208) 983-7296
E-mail:	joel.wasem@chsinc.com
Website:	https://www.chsinc.com/

AUDIT DETAILS:

Contact Date:	August 24, 2022
Inspector:	Edward Johannes, US EPA Region 10 SEE Grantee, Lead RMP Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date:	June 3, 1999
Date of Latest Update:	April 29, 2019

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)
1000097723	Anhydrous Ammonia Storage [sic]	1000122532	42491	2	Ammonia, Aqueous (7664-41-7)	824,100
1000097723	Anhydrous Ammonia Storage	1000122533	42491	2	Ammonia, Anhydrous (7664-41-7)	154,420

PURPOSE:

The purpose of this document review 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 and compliance with Section 312 of the Emergency Planning and Community Right to Know Act (EPCRA) which requires the Tier II Chemical Inventory Reports to be submitted annually. EPA Region 10 RMP inspectors are conducting offsite compliance monitoring when warranted for the RMP facility.

- The facility has been previously inspected in the past 5 years: No ☒ Yes ☐
  If Yes, Date of Last Inspection:

- Is the emergency contact information current? No ☐ Yes ☒
- The facility is High Risk: No ☒ Yes ☐
- Joint EPCRA inspection: No ☐ Yes ☒

<u>CAA Title V Air Permit</u>:
Does the facility have a CAA Title V Permit? No ☒ Yes ☐
If Yes, Permit Number:

<u>RELEASE/ACCIDENT HISTORY</u>:
Did the facility have a reportable release in the past 5 years? No ☒ Yes ☐
If Yes, Date and Description of the Release:

<u>EPCRA TIER II REPORTING</u>:
Did the facility submit their 2021 Tier II report to the SERC? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: January 25, 2022
If No, calendar year of the most recent Tier II:

Did the facility submit a Tier II to the LEPC and local fire department? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: Not provided.

<u>GENERAL INFORMATION</u>:
The facility is regulated under the Risk Management Program as a Program Level 2 process and is owned and operated by CHS, Inc. This facility is a supplier of fertilizer and other chemicals to farmers. Anhydrous ammonia is stored in a single pressure vessel on the property. Aqua ammonia was also stored at the facility, but they discontinued stocking it. The anhydrous ammonia is transferred into the vessel from semis and then placed into application equipment or nurse tanks. The application equipment and/or nurse tanks are then transported to the farmer's field where the anhydrous ammonia is injected into the soil. There are eight full-time employees on site.

<u>INFORMATION REQUESTED FROM FACILITY</u>:

1. **Hazard Review** – A copy of the last two Hazard Reviews with recommendations and tracking sheets.
2. **Compliance Audit** – A copy of the last two Compliance Audits with recommendations and tracking sheets.
3. **Training** – Training records for each process operator
    a. **Initial Training Records**: Training in the overview of the process and in the operating procedures, emphasis on the specific safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks.
    b. **Refresher Training Records**: Training of each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process.
    c. **Training Documentation:** Records which contains the identity of the employee, the date of training, and the means used to verify that the employee understood the training.
    d. Fill in **Facility Training Summary** sheet.

4. **Emergency Response** – A copy of emails, letters, or notes on meetings with LEPC and local responders including contact information (individual names, phone numbers, email addresses, organization name), dates, and coordination activities.
5. **Tier II Reporting** - Evidence of submission of a Tier II as described in 40 C.F.R. Part 370 to the State Emergency Response Commission (SERC), the Local Emergency Response Committee (LEPC), and the fire department (FD) with jurisdiction over the facility.

ANALYSIS OF DOCUMENTATION SUBMITTED:

1. **Hazard Review:** CHS, Inc. provided their 2017 Process Hazard Analysis (PHA) and the 2020 PHA conducted for the Program 2 covered processes. The 2017 PHAs and 2020 PHA used the What If Analysis method. In 2017, separate PHAs were conducted for the anhydrous ammonia storage and handling and aqua ammonia storage and handling. The facility has discontinued the storing and handling of aqua ammonia process and will update their RMP. For that reason, only the 2020 PHA covered the anhydrous ammonia storage and transfer process. The 2017 PHA had no findings and recommendations and the 2020 PHA shows four findings and recommendation that appear completed but wih no completion dates indicated.

   The hazard reviews are being performed at least every five years as required by 40 CFR, § 68.50.
2. **Compliance Audit:** CHS, Inc. provided their 2017 and 2021 Compliance Audit reports. Eight findings were identified in the 2017 Compliance Audit. All findings were resolved by August 2019. Finding, Section 14, #8 (Has LEPC acknowledgement form been filled out with the LEPC Chair?), was identified in the 2021 Compliance Audit with a proposed completion date of November 14, 2022. This facility did not complete an audit within the 3-year reporting requirement that was due by March 29, 2020. The facility stated the delay in not completing the 2020 Compliance Audit was due to the COVID pandemic travel restrictions.
3. **Training:** Nick Broemeling, CHS Safety Leader provided a completed Training Summary for six operators of the anhydrous ammonia storage and handling process at the Grangeville facility. The operators, the dates of initial and refresher training, and verification means for training are listed in the table below. The refresher training records for the six operators were provided. Initial training records were only provided for one operator (Joel Wasem). Anhydrous ammonia skills verification records dated March 17, 2022, were provided for five operators (Joel Wasem record was not included.).

Employee Name	Date Hired	Initial SOP Training Date	Last SOP Refresher Training Date	Verification Means
Mathew Ruhnke	3/14/2019	2/2020	3/3/2022	Class, observation, test, certification
Wayne Nida	2/2017	2/2020	3/3/2022	Class, observation, test, certification
Vaughn Arnzen	3/9/2020	2/2020	3/3/2022	Class, observation, test, certification
Keith Parks	4/9/2020	2/2020	3/3/2022	Class, observation, test, certification
Joel Wasem	3/1/2012	1/2013	3/3/2022	Class, observation, test, certification
Gabe Forsmann	6/26/2019	2/2020	3/3/2022	Class, observation, test, certification

4. **Emergency Response Coordination (Annually after 9/21/18):** CHS Inc. provided email documentation confirming coordination with the LEPC, and FD for review. Additionally, the facility provided the following:
   - A memo dated May 2, 2018, to the LEPC to ensure they are aware of storage of ammonia at the facility.
   - A memo dated December 13, 2021, to the local FD and LEPC giving more details about the storage of anhydrous ammonia and to emphasize that they are a "non-responding" facility.
   - A forty-page training document available to local FDs that describes the properties and hazards of anhydrous ammonia, proper PPE to use when responding to an anhydrous ammonia release, the different types of vessels where anhydrous ammonia is stored (bulk tanks, nurse tanks, semi-trucks, railcars, etc.), and proper first aid response to administer if exposed to anhydrous ammonia. This training material was sent out in 2013, 2014, 2016, 2017, and 2018.

5. **Tier II Reporting:** The CHS, Inc. submitted the Grangeville facility 2021 Tier II on January 25, 2022, to the SERC, Boise, Idaho. CHS, Inc. was unable to provide the original sending's of the 2021 Tier II to the LEPC (Idaho Disaster Management, Grangeville, Idaho) and to the FD (Grangeville City and Rural Volunteer Fire Department, Grangeville, Idaho). They sent out emails on October 21, 2022, to the LEPC and on October 24, 2022, to the FD asking them to confirm that they had received their 2021 Tier II. Both organizations confirmed they had received the 2021 Tier II from the facility but did not include the date(s) they received them in their emails. The table below is a list and amount of Hazardous or Extremely Hazardous Substances over threshold reporting quantity (except for four) reported on-site by the facility on their 2021 Tier II.

Chemical Name	CAS Number	Amount (in lbs)
Anhydrous Ammonia	007664-41-7	98,141
10-34-0	-	95,019
11-52-0 MAP	007722-76-1	82,351
12-0-0-26S Thio Sulfate	-	72,788
20-0-0-24S Ammonium Sulfate	007783-20-2	151,894
32-0-0	006484-52-2	56,359
Diesel	068476-34-6	493,350
Dimenthoate LV-4 Insecticide	000060-51-5	96
Fuel Oil	068476-30-2	87,687
Gasoline	008006-61-9	131,250
Gramoxone SL 2.0 Herbicide	001910-42-5	608
Lime Pelletized	001317-65-3	64,760
Propane	000074-98-6	3,200
RT 3 Herbicide	070901-12-1	12,229
Weevil-Cide Pellets	020859-73-8	4

AREAS OF CONCERNS:

1. CHS Inc. compliance audits were not conducted at least every three years to verify that the procedures and practices are adequate and are being followed as required [68.58(a)]. The 2021 compliance audit was completed four years after the 2017 audit.
2. Initial training records were not provided for five operators [68.54(a)].
3. The Executive Summary provides a detailed description of the worst-case scenario and alternative release scenario. This sensitive information is prohibited in the Executive Summary and must be deleted in the RMP. [68.155].

The findings in this report will be discussed with the facility via telephone and email after certification of this report.

DOCUMENTS REQUESTED ON FOLLOW-UP:
The following documents were requested after the initial submission of documents. These documents were reviewed to determine compliance with Section 112(r) of the Clean Air Act.

1. Initial training records for the operators.
2. Confirmations that the 2021 Tier II was received by the LEPC and local FD.

AUDIT REPORT CERTIFICATION:
This is to certify that I, Edward Johannes, was the lead inspector at this facility and that I have verified the accuracy of the observations in this inspection report:

EDWARD JOHANNES (Affiliate) Digitally signed by EDWARD JOHANNES (Affiliate) Date: 2022.12.15 13:06:13 -08'00'

Signature Date

JAVIER MORALES Digitally signed by JAVIER MORALES Date: 2022.12.16 08:32:53 -08'00'

RMP Coordinator/Approval Date

ERIN WILLIAMS Digitally signed by ERIN WILLIAMS Date: 2023.01.06 10:36:23 -08'00'

EPCRA Coordinator/Approval Date

Jennifer A Sullivan Digitally signed by Jennifer A Sullivan Date: 2023.01.09 12:28:08 -08'00'

Land Enforcement Section Chief/Approval Date