



**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: OXARC - Springfield
Physical Address: 3417 E Springfield Ave.
Spokane, WA 99202
Phone Number: (509) 535-7794
Latitude/Longitude: 47.664275-117.359341
RMP Facility ID#: 100000248804
FRS ID#: 11000539128
EJ Concerns: No (Below 80%)

CONTACT INFORMATION (RMP Implementation):

Name: Ty Little
Title: EHS Manager/Claim Manager
Phone Number: (509) 547-2492
E-mail: tlittle@oxarc.com

EMERGENCY CONTACT INFORMATION:

Name: Jena Fitzgerald
Title: Executive Vice President
Phone (24-hr): (509) 993-6534
E-mail: jfitzgerald@oxarc.com
Website: www.oxarc.com

TRIP DETAILS:

Inspection Date: July 13, 2023
Inspection Time: 0845 through 1030 hours
EPA Inspection Team:

Edward Johannes, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Peter Phillips, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Terry Garcia, US EPA Region 10 SEE Grantee, RMP Inspector
Mhara Coffman, US EPA Region 10, RMP Inspector
Mike Wolski, Weston Solutions, Inc., EPA START Contractor

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: May 26, 2022

Date of Latest Update: May 26, 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)
1000125273	Chlorine Storage	1000156567	42469	3	Chlorine (7782-50-5)	30,000

PURPOSE:

The purpose of this inspection was to determine if 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: May 26, 2022
- 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 2022 Tier II report to the SERC? No ☐ Yes ☒*If Yes, Date the Tier II was submitted:* 1/31/23 original, 7/7/23 update*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:* 1/31/23 original, 7/7/23 update**INSPECTION ENTRY:**

The EPA Inspection Team (EPA) led by Mr. Edward Johannes arrived at the premises of OXARC, Inc. (facility) in Spokane, Washington, at 08:45 and met with the following facility personnel:

Name	Title, Organization
Ty Little	EHS Manager/Claim Manager, OXARC
James Paradis	Plant Manager, OXARC
Brad Boyce	Safety Coordinator, OXARC

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: Spokane Fire Department

Facility representatives escorted EPA to a central office work area located in the facility main building. Lead Inspector Edward Johannes, introduced all parties present, provided a summary of the Risk Management Program (RMP), and explained the purpose of the visit. Each EPA Inspector 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. Ty Little and James Paradis 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: Drivers are unionized under Teamster Local 690.

An employee representative present during the facility visit:

No ☒

Yes ☐

If Yes, Name/Title:

GENERAL INFORMATION:

The facility is regulated under RMP as a Program Level 3 facility and is owned and operated by OXARC, Inc. This company is a family-owned business that has operated in 21 locations across the Northwest since 1968. The facility receives, stores, and ships compressed gases for sale to industry, providing welding and industrial supplies, safety products, and training, as well as industrial, medical, and specialty gases. There are twenty full-time employees, eight of whom are operators. Facility standard procedures require that three personnel support chlorine loading and offloading. Normal hours of operation are 0400 hours through 1700 hours, Monday through Friday.

The RMP-covered process at the facility consists of chlorine gas stored on site in two container types: five 2,000-pound (1-ton) containers and several 150-pound compressed gas cylinders. Controls or safety equipment include pressure relief meltable fusible plugs (120°F for 1-ton containers and 158°F for 150-pound cylinder), facility alarm system, outside ventilation for releases, and "A" and "B" Chlorine Institute Emergency Kits. In addition to the chlorine, the facility has other RMP regulated substances that include both hydrochloric acid (conc. 37% or greater) and sulfur dioxide, but they occur at this facility below the threshold quantities. The facility also stores EPCRA-regulated chemicals that include sulfur dioxide, sulfuric acid, and propane. Only propane is below reportable amounts under EPCRA at this facility. And finally, the facility stores other compressed gases and chemicals not regulated under EPCRA or RMP that include carbon dioxide, oxygen, nitrogen, argon, and sodium hypochlorite (12.5%). OSHA General Duty Clause would apply to substances having threshold amounts below EPCRA or RMP compliance. At the time of the inspection, the total chlorine inventory reported in their 2022 Tier II was 30,000 pounds.

Operating procedures are available to employees in paper format (binders) and digitally (company intranet).

ON-SITE OBSERVATIONS:

The facility inspection was conducted from approximately 0906 hours to 0915 hours. EPA personnel were escorted by facility representatives Ty Little, James Paradis, and Brad Boyce outside to the east end of the facility. EPA observed the Loading Dock area where the storage area for chlorine and sulfur dioxide was located, the nearby staging area for empty cylinders, the truck parking area, and the adjacent storage area for EPCRA-regulated chemicals and other chemicals. In addition to the area with the covered process, the facility has a security perimeter fence with lockable gates at both entrances. Photographs taken during the inspection are included in Attachment A to this report.

EPA observed the Loading Dock area at the facility, where the facility stages five 1-ton cylinders of chlorine, several 150-pound cylinders of chlorine, and several cylinders of sulfur dioxide in a small area (Photos 1, 2, 3, and 4). The area with these two chemicals had a chain-link security fence enclosure with a locked gate that had hazardous communication (hazcom) signage posted (Photo 5). The area is monitored 24/7 by security cameras (Photo 6). A daily log was examined by the EPA that is maintained by the facility staff on the quantity and container size of chlorine stored onsite at the Loading Dock area (Photos 7 and 8).

EPA observed facility operations, including the staging area for delivery trucks (Photo 9), and the staging area for empty cylinders (Photo 10).

EPA also observed EPCRA-regulated chemicals and other chemicals stored in barrels and totes in a larger dedicated staging area (Photos 11 and 12).

After touring the RMP-covered process areas at the facility, EPA returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to Ty Little, James Paradis, and Brad Boyce. EPA departed the facility at 1000 hours.

INFORMATION COLLECTED FROM FACILITY:

1. Figure D-1. OXARC – Springfield Evacuation Assembly Areas
2. Process Hazard Analysis
3. Appendix G. Operating Procedures and Safe Work Practices
4. G.2. Annual Review of Operating Procedures Log (example)
5. Standing Operating Procedure G1: Chlorine Storage (4 pages)
6. Standing Operating Procedure G2: Sulfur Dioxide Storage (4 pages)
7. Emergency Response Contact List

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

1. OXARC did not address engineering and administrative controls applicable to hazards and interrelationships and consequence of failure of engineering and administrative controls in their February 2, 2022, PHA [68.67(c)(3), (4)].
2. OXARC listed the team's titles but did not list their names in their February 2, 2022, PHA [68.67(d)].

DOCUMENTS REQUESTED NOT INCLUDED IN REPORT:

During the inspection, no follow-up document requests were made requiring further review.

INSPECTION 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: 2023.10.31 15:13:51 -07'00'

Inspector Signature

JAVIER MORALES

Digitally signed by JAVIER

MORALES

Date: 2023.11.01 08:40:21 -07'00'

RMP Coordinator/Approval

ERIN WILLIAMS

Digitally signed by ERIN WILLIAMS

Date: 2023.11.06 15:04:23 -08'00'

EPCRA Coordinator/Approval

MATTHEW

QUARTERMAN

Digitally signed by MATTHEW

QUARTERMAN

Date: 2023.11.09 12:40:42 -08'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: OXARC- Springfield

City, State: Spokane, Washington

Photographer: Mike Wolski

File	Photo Layout ID	Date	Time	Description
Photo1.jpg	1	7/13/2023	9:06 AM	Exterior Loading Dock and Cylinder Storage; Five 1-ton chlorine cylinders in the Cylinder Storage area
Photo2.jpg	2	7/13/2023	9:06 AM	Exterior Loading Dock and Cylinder Storage; Five 1-ton and several 150-pound cylinders containing chlorine
Photo3.jpg	3	7/13/2023	9:06 AM	Facility Exterior; Compressed gas cylinders containing chlorine gas and sulfur dioxide
Photo4.jpg	4	7/13/2023	9:06 AM	Exterior Loading Dock and Cylinder Storage; Five 1-ton chlorine cylinders
Photo5.jpg	5	7/13/2023	9:06 AM	Facility Exterior; Hazardous communication (hazcom) signage posted on gate to the secure chemical storage area
Photo6.jpg	6	7/13/2023	9:06 AM	Facility Exterior; Security camera
Photo7.jpg	7	7/13/2023	9:10 AM	Daily chlorine container inventory log
Photo8.jpg	8	7/13/2023	9:10 AM	Daily chlorine container inventory log
Photo9.jpg	9	7/13/2023	9:10 AM	Delivery Truck Parking Area; OXARC delivery trucks
Photo10.jpg	10	7/13/2023	9:10 AM	Empty Cylinder Staging Area; Empty cylinders
Photo11.jpg	11	7/13/2023	9:15 AM	Chemical Storage Area; EPCRA-regulated and other chemicals stored in totes and barrels
Photo12.jpg	12	7/13/2023	9:15 AM	Chemical Storage Area; EPCRA-regulated and other chemicals stored in totes and barrels