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

SUBJECT:	CLEAN AIR ACT INSPECTION REPORT The Home City Ice Company, Chicago, Illinois
FROM:	Matthew Walters, Environmental Engineer AECAB (MN/OH)
THRU:	Sarah Marshall, Section Supervisor AECAB (MI/WI)
TO:	File

BASIC INFORMATION

Facility Name: The Home City Ice Company

Facility Location: 3600 West 59th Street, Chicago, IL 60629

Date of Inspection: August 30-31, 2023

EPA Inspector(s):
1. Matthew Walters, Environmental Engineer
2. Manojkumar Patel, Environmental Engineer

Other Attendees:
1. Bob Rusthoven, Zone Manager, The Home City Ice Company
2. Anthony Havel, Service Technician, F.E. Moran (former Lang Ice Company employee)
3. Chris Boger, Service Technician, F.E. Moran
4. Shawn Corrigan, Engineer, The Home City Ice Company (via phone on 08/31/2023 only)

Contact Email Address: brusthoven@homecityice.com, scorrigan@homecityice.com

Purpose of Inspection: Compliance with the Prevention of Accidental Releases found in Section 112(r) of the Clean Air Act (CAA), 42 U.S.C. § 7412(r)

Facility Type: Ice manufacturing plant with ammonia refrigeration

Regulations Central to Inspection: The Chemical Accident Prevention Provisions at 40 C.F.R. Part 68, commonly referred to as the Risk Management Program

Arrival Time: 8/30/2023- 9:40 a.m., 8/31/2023- 9:15 a.m.
Departure Time: 8/30/2023- 4:45 pm, 8/31/2023- 2:15 p.m.

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 The Home City Ice Company (Home City Ice) personnel or F.E. Moran contractors unless otherwise noted.

Company Ownership: Home City Ice purchased the facility from Lang Ice Company in October 2021.

Process Description:

The Home City Ice West 59th Street facility manufactures, packages, and distributes ice. Ammonia refrigeration is used for ice making and to provide cooling to the "House" where ice is stored and packaged. There are two engine rooms at the plant with in-service ammonia refrigeration equipment, designated as the Middle Engine Room and West Engine Room. The east portion of the facility contains a decommissioned block ice plant. At the time of the inspection, only compressors in the West Engine Room were operating, which facility personnel stated was normal practice. West Engine Room compressors RC1 (125 HP) and RC2 (250 HP) supply approximately 10 psi ammonia to run the House evaporators and compressors RC3 (250 HP) and GEA (600 HP) supply approximately 25 psi ammonia to run the ice makers. Other equipment in the West Engine Room includes two pressure vessels for ammonia accumulation designated as the Vogt Accumulator (low temperature) and the Evaporator Accumulator (high temperature), an ammonia/glycol heat exchanger designated as GC-2, and ice makers. The Middle Engine Room equipment includes three compressors, two accumulators, and ice makers. The Middle Engine Room equipment is interconnected to the West Engine Room and contained ammonia at the time of the inspection. Fresh ammonia deliveries are made to the Middle Engine Room.

Staff Interview:

Prior to the site inspection, Inspectors reviewed news media and a Chicago Fire Department (CFD) Incident Report related to an ammonia release from the facility. The Incident Report states that CFD was dispatched to Home City Ice at 4:32 a.m. on July 27, 2023. Inspectors interviewed facility personnel to collect information on the release, the facility's emergency response procedures, and the facility's process safety and risk management practices.

The Home City Ice Zone Manager provided the following information:

- Home City Ice believed that the ammonia refrigeration system was operating under the 10,000-pound ammonia threshold.
- The person responsible for Risk Management Plan (RMP) implementation under previous ownership departed the company at the time of ownership change.
- Home City Ice contracts F.E. Moran to maintain the ammonia refrigeration process, but there is no formal scope of work or other agreement currently in place. Previously, Home City Ice contracted Dual Temp for similar services.
- Home City Ice employees turn ammonia refrigeration equipment on or off, but they do not operate the process per se. Home City Ice does not provide equipment-specific training on the ammonia refrigeration process to its employees at the plant.
- Home City Ice does not regularly monitor ammonia refrigeration process operating parameters. The Zone Manager and Plant Manager periodically monitor the engine rooms to ensure equipment is running.
- The plant is not a responding facility and relies on outside agencies (primarily CFD) for emergency response. After the ammonia release on July 27, 2023, Home City Ice performed coordination activities with CFD. Prior to this recent activity, Home City Ice had not coordinated with CFD since purchasing the facility in 2021.
- Three employees (baggers) were on shift at the time of the ammonia release. The employees were unaware that the release was occurring until being notified by CFD. No injuries were reported.
    - Home City Ice is not aware of the activation of any alarms or other indications that the release was occurring. The ammonia detection system at the plant was out of date and untested at the time of the release.
    - A new ammonia detection system was installed following the release with visual and audible alarms.
- At the time of the inspection, Home City Ice was receiving bids to update its Process Safety Management (PSM) program for the plant.

F.E. Moran Service Technicians provided the following information:

- Historically, three compressors in the West Engine Room all operated at the same discharge pressure (approximately 20–35 psig). Home City Ice contracted Dual Temp to modify the system after purchasing the facility. The modifications included installing a

new compressor in the West Engine Room (GEA screw compressor) and operating the House evaporators at a lower ammonia pressure than the ice makers.

- F.E. Moran discovered a near-miss event following the GEA screw compressor project modifications where the GEA compressor was found to be off and the pressure gauge pointer for the low temperature ammonia suction line was pegged against the stop pin (150 psig).
    - F.E. Moran relieved the pressure by opening a manual valve located above the Vogt Accumulator and instructed Home City Ice management on the use of the valve in response to high pressure on the low temperature ammonia suction line.
    - F.E. Moran determined that there was a system design issue and developed a plan to address the issue. The plan had not been implemented as of July 27, 2023.
- F.E. Moran was notified of the release on the morning of July 27, 2023. The F.E. Moran Service Technician who arrived at the facility while the release was ongoing indicated that:
    - A visible cloud was coming from the relief stack on the roof of the West Engine Room. Inspectors subsequently verified this observation by viewing news footage of the release.
    - CFD was formulating a plan to make entry into the building when the Service Technician arrived. F.E. Moran advised against entering the building due to the potential for a flammable atmosphere and informed CFD that an E-stop button was in the Fireman's Dump panel on the building exterior.
    - After CFD hit the E-stop, the visible release stopped within approximately five minutes. CFD also opened ammonia valves from the Fireman's Dump, which mixes process ammonia with water from the fire department connection and dumps the mixture to the sewer.
    - The building was ventilated, and F.E. Moran made entry with CFD to check for ongoing ammonia leaks. The entry team wore full suits with supplied air. CFD detection equipment indicated the ammonia concentration within the building was approximately 600 ppm.[1] No additional releases were discovered inside the building.
- F.E. Moran and Home City Ice started investigating the incident immediately and determined:
    - An evaporative condenser water pump was shut down for maintenance prior to the release, causing high head pressure. This high pressure tripped the GEA screw compressor offline.
    - Because the ice maker was still harvesting, the GEA compressor was offline, and the manual valve to the Vogt Accumulator was closed, high pressure developed on the low temperature ammonia suction line.

[1] The National Institute for Safety and Health (NIOSH) lists the immediately dangerous to life or health (IDLH) level for ammonia as 300 ppm.

  - Backpressure developed at the GC-2 glycol chiller, which has an ammonia pressure relief valve (PRV). At the time of the release, the PRV discharge was routed to the West Engine Room ammonia relief header.
  - The high backpressure caused the PRV on GC-2 to lift, and ammonia was released through the relief header and out the relief stack on top of the West Engine Room.
- Post-release modifications performed by F.E. Moran included re-routing certain PRV discharge lines and installing a pressure regulator on the ammonia piping.

Data Collected and Observations:

The following observations were made during the records review process:

Risk Management Program Applicability

Inspectors requested information on the quantity of ammonia in the refrigeration process to determine applicability of the Chemical Accident Prevention Provisions as set forth by 40 C.F.R. § 68.10. An owner or operator of a stationary source with more than a threshold quantity of a regulated substance in a process must comply with the provisions of 40 C.F.R. Part 68. The threshold quantity of ammonia listed in Table 1 to 40 C.F.R. § 68.130 is 10,000 pounds. During the inspection, the facility was unable to provide documentation on the quantity of ammonia in the refrigeration system at the time of the release on July 27, 2023. The active RMP for the facility lists the ammonia quantity as 20,000 pounds. Home City Ice provided documentation showing that 6,933 pounds of ammonia were removed from the process on July 31, 2023, 10,145 pounds of ammonia were added to the process on August 8, 2023, and an additional 3,129 pounds of ammonia were added to the process on August 9, 2023.

Management System for Implementing Elements of Risk Management Program

Inspectors requested documentation of the management system for implementing elements of the Risk Management Program, as specified in 40 C.F.R. § 68.15(a). The facility was unable to provide records of a Risk Management Program management system at the time of the inspection.

Hazard Assessment

Inspectors requested documentation of the worst-case release scenario and alternative release scenario that are reported in the active RMP for the facility. The facility was unable to provide the records of the offsite consequence analyses specified in 40 C.F.R. § 68.39 at the time of the inspection.

Program 3 Prevention Program

Inspectors requested documentation on the Program 3 requirements specified at 40 C.F.R. Part 68, Subpart D. The facility produced a series of numbered “PSM” binders that contained various procedures and documentation. Inspectors reviewed the binders and made the following observations:

- *Process Safety Information Binder*: The revision date for the first 98 pages of the binder was 2012. The process flow diagrams were dated 2005 and did not reflect the current equipment configuration. U1 forms for pressure vessels were included within the binder. Piping and Instrumentation Diagrams (P&IDs) were separate from the binder and did not reflect the current equipment configuration.
- *Process Hazard Analysis (PHA) Binder*: The binder contained a 2003 PHA and a revised 2004 PHA. The facility conducted these PHAs using the "What-If" method. There were also two sheets of paper within the binder that indicated a PHA team met in 2015, but the facility was unable to provide more recent PHAs at the time of the inspection. 40 C.F.R. § 68.67 specifies that a PHA for an existing covered process should have been first performed no later than 1999 and then updated or revalidated at least every five years.
- *Operating Procedures Binder*: The binder contained a table of contents and general information on the operating procedure program. The table of contents lists 94 standard operating procedures for the ammonia refrigeration process. The facility was unable to provide any of the standard operating procedures at the time of the inspection.
- *Training Binder*: Inspectors did not review the training procedures because the facility stated that the training procedures contained within the binder were not in use and did not reflect current training material.
- *Mechanical Integrity Binder*: Inspectors found the binder to be empty. The facility was unable to provide mechanical integrity procedures or records at the time of the inspection.
- *Management of Change (MOC) Binder*: The binder contained an MOC procedure. At the time of the inspection, the facility was unable to provide documentation to demonstrate that the procedure was followed for the GEA screw compressor project or for piping modifications made in response to the ammonia release on July 27, 2023.
- *Pre-startup Safety Review (PSSR) Binder*: The binder contained a PSSR procedure. At the time of the inspection, the facility was unable to provide documentation to demonstrate that the procedure was followed for the GEA screw compressor project or for piping modifications made in response to the ammonia release on July 27, 2023.
- *Compliance Audits Binder*: The binder contained a compliance audit procedure. At the time of the inspection, the facility was unable to provide any compliance audit reports that had been performed for the ammonia refrigeration process.
- *Incident Investigation Binder*: The binder contained an incident investigation procedure. At the time of the inspection, the facility was unable to provide an incident investigation report for the ammonia release that occurred on July 27, 2023.
- *Hot Work Binder*: The binder contained a procedure for hot work and blank hot work permits.
- *Contractor Binder*: The binder contained a contractor management procedure and contractor qualifications for Dual Temp. At the time of the inspection, the facility was unable to provide contractor qualifications for F.E. Moran, or other contractors that it currently uses for the ammonia refrigeration process.

Emergency Response

Inspectors requested emergency response documentation for the plant. The facility provided a five-page Emergency Action Plan (EAP) that covers fires, severe weather, and ammonia leaks. Inspectors noted that the EAP provided limited details on responding to an ammonia leak and appeared to be inconsistent with current plant practices. The facility does not know if it is included in the community emergency response plan, as required at 40 C.F.R. § 68.90(b)(1) for non-responding stationary sources with a regulated toxic substance held in a process above the threshold quantity. The facility did not have the records specified by 40 C.F.R. § 68.93 for coordination with local authorities within the year prior to the release because Home City Ice did not coordinate with local emergency planning and response organizations between purchasing the facility in October 2021 and the ammonia release on July 27, 2023.

TOUR INFORMATION

EPA Tour of the Facility: Yes

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

See Appendix A for Digital Image Log

Field Measurements: were not taken during this inspection.

Tour Observations:

EPA inspectors observed post-release modifications that included new ammonia detection equipment, re-routed PRV discharge piping, and a new pressure relief valve on the ammonia dry suction piping. Corrosion was visible on exposed piping and piping components (*e.g.*, drain valve on Vogt Accumulator level control device). The safety shower and eyewash in the West Engine Room was non-functional, and the eyewash in the Middle Engine Room was non-functional.

RECORDS REVIEW

The following records were viewed by EPA during the inspection. Records that were copied at the facility and provided to Inspectors are indicated with an asterisk.

1. PSM Binder 2- Process Safety Information (Building ventilation system documents within binder*)
2. PSM Binder 4- Pre-Startup Safety Review
3. PSM Binder 5- Operating Procedures*
4. PSM Binder 7- Management of Change
5. PSM Binder 8- Hot Work
6. PSM Binder 10- Contractors

7. PSM Binder 11- Incident Investigation
8. PSM Binder 12- Compliance Audits
9. PSM Binder- Process Hazard Analysis
10. SDS Binder
11. P&ID R-9
12. Emergency Action Plan
13. Lang Ice Company Ammonia Log
14. F.E. Moran Invoices*
15. Airgas Ammonia Delivery Receipts*

CLOSING CONFERENCE

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

Requested documents:

The following request list, grouped by regulatory reference from 40 C.F.R. Part 68, was sent to Home City Ice on September 1, 2023:

- § 68.10 Applicability of Risk Management Program
    - Records of all ammonia delivered to the refrigeration system in pounds since October 2021
    - Records of all ammonia removed from the refrigeration system in pounds since October 2021
    - Records that demonstrate that the refrigeration system operated with less than a threshold quantity of ammonia (10,000 pounds) since October 2021
    - Copy of the "Lang Ice Company Ammonia Log" binder
- § 68.39 Documentation of Offsite Consequence Analyses
    - Documentation of Worst Case and Alternative Release scenarios reported in the RMP submitted by Lang Ice Company on September 6, 2019
- § 68.65 Process safety information.
    - Copy of the first 98 pages of PSM Binder 2
    - Copy of the two cover pages for the U1 forms in PSM Binder 2
    - Copies of the U1 forms for the Vogt Accumulator (West room light blue vessel), Evaporator Accumulator (West room dark blue vessel), and GC-2 glycol chiller
    - Copy of the block flow diagrams in PSM Binder 2

  - The newly issued, revised, and/or redlined P&IDs prepared by Home City Ice or contractor (F.E. Moran) that accurately reflect the current configuration of the ammonia refrigeration system
  - The relief system design and design basis that accurately reflect the current pressure relief configuration on the ammonia refrigeration system

- § 68.67 Process hazard analysis.
  - All process hazard analyses and updates or revalidations that have been performed for the ammonia refrigeration process since 1999.
  - Copy of all documents in the PHA binder
- § 68.69 Operating procedures.
  - Copy of any pages missing from PSM Binder 5, if they exist.
- § 68.71 Training.
  - Training records for employees who work with or around the ammonia refrigeration system (*e.g.*, Maintenance Men and Baggers)
  - Training materials that cover specific safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks.
- § 68.73 Mechanical integrity.
  - Any mechanical integrity procedures for the ammonia refrigeration system (which may have previously been contained within the empty Mechanical Integrity binder).
  - Records of the most recent inspection and testing of process equipment that has been performed in accordance with the Mechanical Integrity program.
- § 68.75 Management of change.
  - Copy of PSM Binder 7
  - All engineering documentation, including management of change documentation, on ammonia refrigeration equipment decommissioning that has occurred since October 2021
  - All engineering documentation, including management of change documentation, on the GEA Screw Compressor project
  - All engineering documentation, including management of change documentation, on the equipment modifications made following the July 27, 2023 ammonia release
- § 68.77 Pre-startup review.
  - Copy of PSM Binder 4
  - Documentation of the pre-startup safety review performed for the GEA Screw Compressor project

  - Documentation of the pre-startup safety review performed following the July 27, 2023 ammonia release equipment modifications

- § 68.79 Compliance audits.
  - Copy of PSM Binder 12
  - Most recent compliance audit report
- § 68.81 Incident investigation.
  - Copy of PSM Binder 11
  - All work product from the investigation of the July 27, 2023 ammonia release
  - Documentation of any resolutions and corrective actions taken in response to the July 27, 2023 ammonia release
- § 68.85 Hot work permit.
  - Copy of PSM binder containing hot work procedures.
- § 68.87 Contractors.
  - Copy of the contractor procedure contained within PSM Binder 10
  - Information regarding the contract owner or operator's safety performance and programs for any contractor who has worked on the ammonia refrigeration system (including safety systems) in the past year.
  - All invoices, purchase orders, contracts, scope of work documents, or other agreements between Home City Ice and F.E. Moran or Dual Temp from October 2021 to present
- § 68.93 Emergency response coordination activities.
  - Copy of the Emergency Action Plan (and the floor plans included with the EAP)
  - Documentation of the most recent coordination activity with the Chicago Fire Department that includes the names of individuals involved and their contact information (phone number, email address, and organizational affiliations); dates of coordination activities; and nature of coordination activities.
  - Documentation of any communication with the Chicago Local Emergency Planning Committee since October 2021.

Compliance Assistance:

- Inspector Walters emailed the facility point of contact links to EPA RMP guidance documents on change of ownership and ammonia refrigeration systems. A link to the Chicago LEPC website was also provided.

Concerns:

- Lack of adherence to the facility's Risk Management Plan once Home City Ice purchased the facility in 2021.

- Contractors appear to be operating and maintaining the ammonia refrigeration process without oversight or a defined scope of work.
- No Home City Ice employees at the plant are trained or qualified to operate and maintain the ammonia refrigeration process.
- Ammonia delivery invoices and facility process safety information indicate that the process contains greater than 10,000 pounds of ammonia, but Home City Ice believed that the ammonia inventory was below the 10,000-pound threshold.

DIGITAL SIGNATURES

Report Author: MATTHEW WALTERS

Digitally signed by MATTHEW WALTERS
Date: 2023.10.13 10:33:53 -05'00'

Section Supervisor: SARAH MARSHALL

Digitally signed by SARAH MARSHALL
Date: 2023.10.13 10:42:16 -05'00'

APPENDICES

A. Digital Image Log

ATTACHMENTS

1. RMP Program Level 3 Process Checklist

APPENDIX A: DIGITAL IMAGE LOG

1. **Inspector Name:** Matthew Walters	2. **Archival Record Location:** ***R5 Electronic Record Center (AECAB Library/Enf_Home City Ice Chicago_IL_23/Inspection_2023.08.30/Photos)***

Image Number	File Name	Date and Time (CDT)	Description of Image
1	MSW_2023.08.31 (1).JPG	2023:08:31 10:18:42	Fireman's Dump panel on the southwest side of the facility
2	MSW_2023.08.31 (2).JPG	2023:08:31 10:18:56	Interior of Fireman's Dump panel
3	MSW_2023.08.31 (3).JPG	2023:08:31 10:19:01	E-stop and emergency ventilation buttons in the Fireman's Dump panel
4	MSW_2023.08.31 (4).JPG	2023:08:31 10:19:09	Instruction sheet and ammonia valve stem in the Fireman's Dump panel
5	MSW_2023.08.31 (5).JPG	2023:08:31 10:19:18	Ammonia valve handwheel in the Fireman's Dump panel
6	MSW_2023.08.31 (6).JPG	2023:08:31 10:19:22	Emergency contact list in the Fireman's Dump panel
7	MSW_2023.08.31 (7).JPG	2023:08:31 10:20:20	Plant entrance on Southwest side of building facing 59th Street
8	MSW_2023.08.31 (8).JPG	2023:08:31 10:20:29	Ammonia detection alarms on building exterior
9	MSW_2023.08.31 (9).JPG	2023:08:31 10:20:39	Warning sign on plant entrance door
10	MSW_2023.08.31 (10).JPG	2023:08:31 10:20:52	Fire department connection and ammonia detection monitor on plant exterior
11	MSW_2023.08.31 (11).JPG	2023:08:31 10:20:57	Ammonia detection monitor on building exterior showing 0 ppm ammonia
12	MSW_2023.08.31 (12).JPG	2023:08:31 10:27:10	Exterior door to the West Engine Room
13	MSW_2023.08.31 (13).JPG	2023:08:31 10:27:17	Ammonia detector control panel located near the West Engine Room exterior door
14	MSW_2023.08.31 (14).JPG	2023:08:31 10:27:25	E-stop and emergency ventilation buttons near the West Engine Room exterior door
15	MSW_2023.08.31 (15).JPG	2023:08:31 10:27:40	Spare parts stored outside the West Engine Room
16	MSW_2023.08.31 (16).JPG	2023:08:31 10:32:34	Interior door to the West Engine Room
17	MSW_2023.08.31 (17).JPG	2023:08:31 10:32:39	Ammonia detection alarms above interior door to the West Engine Room
18	MSW_2023.08.31 (18).JPG	2023:08:31 10:33:41	GC-2 Glycol Chiller P&ID with pen tip pointing to PRV that lifted during the ammonia release on July 27, 2023

Image Number	File Name	Date and Time (CDT)	Description of Image
19	MSW_2023.08.31 (19).JPG	2023:08:31 10:33:53	PRV on GC-2 Glycol Chiller in West Engine Room
20	MSW_2023.08.31 (20).JPG	2023:08:31 10:34:04	PRV on GC-2 Glycol Chiller in West Engine Room
21	MSW_2023.08.31 (21).JPG	2023:08:31 10:34:15	PRV on GC-2 Glycol Chiller in West Engine Room
22	MSW_2023.08.31 (22).JPG	2023:08:31 10:35:24	PRV on GC-2 Glycol Chiller in West Engine Room
23	MSW_2023.08.31 (23).JPG	2023:08:31 10:35:35	PRV on GC-2 Glycol Chiller in West Engine Room
24	MSW_2023.08.31 (24).JPG	2023:08:31 10:37:47	Control panel and analog pressure gauges in West Engine Room
25	MSW_2023.08.31 (25).JPG	2023:08:31 10:37:56	Analog pressure gauge for the low temperature suction line indicating an ammonia pressure of approximately 30 psig
26	MSW_2023.08.31 (26).JPG	2023:08:31 10:38:35	Electrical disconnects for condensate pumps in the West Engine Room
27	MSW_2023.08.31 (27).JPG	2023:08:31 10:41:02	Glycol piping and pump to the GC-2 Glycol Chiller in the West Engine Room
28	MSW_2023.08.31 (28).JPG	2023:08:31 10:43:02	Low temperature ammonia suction piping entering and exiting the GC-2 Glycol Chiller in the West Engine Room
29	MSW_2023.08.31 (29).JPG	2023:08:31 10:45:14	High pressure liquid and low temperature suction lines running east/west along the ceiling of the West Engine Room
30	MSW_2023.08.31 (30).JPG	2023:08:31 10:45:27	Low temperature suction line to the GEA screw compressor in the West Engine Room
31	MSW_2023.08.31 (31).JPG	2023:08:31 10:45:50	Suction side of the GEA screw compressor with pressure switch
32	MSW_2023.08.31 (32).JPG	2023:08:31 10:45:55	GEA screw compressor
33	MSW_2023.08.31 (33).JPG	2023:08:31 10:46:09	GEA screw compressor nameplate
34	MSW_2023.08.31 (34).JPG	2023:08:31 10:47:08	GEA screw compressor pressure relief valves
35	MSW_2023.08.31 (35).JPG	2023:08:31 10:47:18	GEA screw compressor pressure relief valves
36	MSW_2023.08.31 (36).JPG	2023:08:31 10:47:23	GEA screw compressor pressure relief valves
37	MSW_2023.08.31 (37).JPG	2023:08:31 10:47:30	GEA screw compressor pressure relief valves
38	MSW_2023.08.31 (38).JPG	2023:08:31 10:47:35	GEA screw compressor pressure relief valves
39	MSW_2023.08.31 (39).JPG	2023:08:31 10:47:43	Isolation valve for GEA screw compressor pressure relief valves

Image Number	File Name	Date and Time (CDT)	Description of Image
40	MSW_2023.08.31 (40).JPG	2023:08:31 10:48:09	GEA screw compressor pressure relief valves discharge vent
41	MSW_2023.08.31 (41).JPG	2023:08:31 10:48:23	Vertical high discharge stage (HDS) line (left) and vertical GEA screw compressor pressure relief valves discharge vent (right)
42	MSW_2023.08.31 (42).JPG	2023:08:31 10:48:48	Low temperature/high pressure Vogt Accumulator vessel in the West Engine Room
43	MSW_2023.08.31 (43).JPG	2023:08:31 10:50:11	Closed manual valve on low temperature suction piping leading to the Vogt Accumulator
44	MSW_2023.08.31 (44).JPG	2023:08:31 10:50:26	GEA compressor control panel
45	MSW_2023.08.31 (45).JPG	2023:08:31 10:50:34	GEA compressor control panel screen
46	MSW_2023.08.31 (46).JPG	2023:08:31 10:50:58	Level control device on the Vogt Accumulator
47	MSW_2023.08.31 (47).JPG	2023:08:31 10:52:14	PRVs on the Vogt Accumulator
48	MSW_2023.08.31 (48).JPG	2023:08:31 10:53:27	RC #1 compressor in the West Engine Room
49	MSW_2023.08.31 (49).JPG	2023:08:31 10:53:51	RC #2 compressor in the West Engine Room
50	MSW_2023.08.31 (50).JPG	2023:08:31 10:54:10	RC #3 compressor in the West Engine Room
51	MSW_2023.08.31 (51).JPG	2023:08:31 10:54:23	Drain valve on Vogt Accumulator level control device
52	MSW_2023.08.31 (52).JPG	2023:08:31 10:54:30	Drain valve on Vogt Accumulator level control device
53	MSW_2023.08.31 (53).JPG	2023:08:31 10:56:13	Vertical relief stack to roof of West Engine Room
54	MSW_2023.08.31 (54).JPG	2023:08:31 10:56:22	Vertical relief stack to roof of West Engine Room
55	MSW_2023.08.31 (55).JPG	2023:08:31 10:56:47	Ammonia detectors is West Engine Room
56	MSW_2023.08.31 (56).JPG	2023:08:31 10:56:53	Ammonia detectors is West Engine Room
57	MSW_2023.08.31 (57).JPG	2023:08:31 10:59:17	Low temperature suction pressure gauge in the West Engine Room
58	MSW_2023.08.31 (58).JPG	2023:08:31 10:59:34	Pressure tap for the low temperature suction pressure gauge and local pressure gauge on the low temperature suction ammonia line
59	MSW_2023.08.31 (59).JPG	2023:08:31 11:00:17	Non-functional eyewash and safety shower in the West Engine Room
60	MSW_2023.08.31 (60).JPG	2023:08:31 11:11:09	Ammonia piping above the Vogt Accumulator

Image Number	File Name	Date and Time (CDT)	Description of Image
61	MSW_2023.08.31 (61).JPG	2023:08:31 11:11:15	Pressure regulator to relieve the low temperature suction line to the Evaporator Accumulator
62	MSW_2023.08.31 (62).JPG	2023:08:31 11:11:26	Vogt Accumulator and Evaporator Accumulator in the West Engine Room
63	MSW_2023.08.31 (63).JPG	2023:08:31 11:11:34	Evaporator Accumulator and high temperature suction line in the West Engine Room
64	MSW_2023.08.31 (64).JPG	2023:08:31 11:11:51	Building ventilation on the ceiling of the West Engine Room
65	MSW_2023.08.31 (65).JPG	2023:08:31 11:29:06	Entrance to Middle Engine Room
66	MSW_2023.08.31 (66).JPG	2023:08:31 11:29:11	E-stop button, emergency ventilation button, and ammonia detection monitor at entrance to Middle Engine Room
67	MSW_2023.08.31 (67).JPG	2023:08:31 11:29:16	Ammonia detection alarms at entrance to Middle Engine Room
68	MSW_2023.08.31 (68).JPG	2023:08:31 11:29:46	Ammonia detectors in the Middle Engine Room
69	MSW_2023.08.31 (69).JPG	2023:08:31 11:31:12	Low Pressure Receiver in the Middle Engine Room
70	MSW_2023.08.31 (70).JPG	2023:08:31 11:31:26	High Pressure Receiver in the Middle Engine Room
71	MSW_2023.08.31 (71).JPG	2023:08:31 11:31:32	High Pressure Receiver nameplate
72	MSW_2023.08.31 (72).JPG	2023:08:31 11:31:47	Low Pressure Receiver nameplate
73	MSW_2023.08.31 (73).JPG	2023:08:31 11:32:21	Morris ice maker in the Middle Engine Room
74	MSW_2023.08.31 (74).JPG	2023:08:31 11:32:26	Screen on Morris Ice Maker
75	MSW_2023.08.31 (75).JPG	2023:08:31 11:34:29	Ice collection bin in the House
76	MSW_2023.08.31 (76).JPG	2023:08:31 11:36:59	Middle Engine Room roof
77	MSW_2023.08.31 (77).JPG	2023:08:31 11:37:25	West Engine Room roof
78	MSW_2023.08.31 (78).JPG	2023:08:31 11:37:43	Pressure relief stacks on West Engine Room roof
79	MSW_2023.08.31 (79).JPG	2023:08:31 11:37:54	GEA compressor pressure relief stack (left) and West Engine Room common pressure relief header stack (right)
80	MSW_2023.08.31 (80).JPG	2023:08:31 11:38:00	Ammonia detectors on West Engine Room pressure relief stacks
81	MSW_2023.08.31 (81).JPG	2023:08:31 11:38:44	Pressure relief stacks on West Engine Room roof

Image Number	File Name	Date and Time (CDT)	Description of Image
82	MSW_2023.08.31 (82).JPG	2023:08:31 11:39:26	Southwest-facing picture showing windsock on roof and CFD Engine Company No. 88 across 59th Street
83	MSW_2023.08.31 (83).JPG	2023:08:31 11:39:54	Building ventilation exhaust on West Engine Room roof
84	MSW_2023.08.31 (84).JPG	2023:08:31 11:40:00	Building ventilation exhaust on West Engine Room roof
85	MSW_2023.08.31 (85).JPG	2023:08:31 11:42:14	Pressure relief stack on Middle Engine Room roof
86	MSW_2023.08.31 (86).JPG	2023:08:31 11:42:28	Ammonia detector on Middle Engine Room pressure relief stack
87	MSW_2023.08.31 (87).JPG	2023:08:31 11:42:34	Ammonia detector on Middle Engine Room pressure relief stack
88	MSW_2023.08.31 (88).JPG	2023:08:31 11:45:52	Thermometer in House showing a temperature of approximately 20°F
89	MSW_2023.08.31 (89).JPG	2023:08:31 11:56:06	Trapdoor and ammonia receiving line used to add fresh ammonia to the system in the Middle Engine Room
90	MSW_2023.08.31 (90).JPG	2023:08:31 12:01:26	Fireman's Dump valves with valve stems extending through wall to Fireman's Dump panel
91	MSW_2023.08.31 (91).JPG	2023:08:31 12:01:56	Fireman's Dump valves with valve stems extending through wall to Fireman's Dump panel
92	MSW_2023.08.31 (92).JPG	2023:08:31 12:02:00	Fireman's Dump valves with valve stems extending through wall to Fireman's Dump panel
93	MSW_2023.08.31 (93).JPG	2023:08:31 12:02:22	Locked and tagged drain valve above Fireman's Dump valve
94	MSW_2023.08.31 (94).JPG	2023:08:31 12:02:30	Locked and tagged drain valve above Fireman's Dump valve
95	MSW_2023.08.31 (95).JPG	2023:08:31 12:02:54	Tag on drain valve above Fireman's Dump valve
96	MSW_2023.08.31 (96).JPG	2023:08:31 14:27:56	Damaged trees at CFD Engine Company No. 88 across 59th Street from the facility

Attachment 1: RMP Program Level 3 Process Checklist

General Facility Information

Facility Name:	Home City Ice Company (f/k/a Lang Ice Compnay)		
Mailing Address (Street, City, State, Zip):	3600 West 59th Street Chicago, IL 60629		
Physical Address (Street, City, State, Zip):	3600 West 59th Street Chicago, IL 60629		
Latitude/Longitude: (Source)	41.786281, -87.714267 (Address Matching - House Number)		
County:	Cook		
RMP Number/ FRS Number:	1000082354		
Facility Contact (Name, Title):	Bob Rusthoven, Zone Manager		
Facility Contact Phone No:	773-908-6099	Facility Contact Email:	brusthoven@HomeCityIce.com
Reported NAICS Code(s):	312113		

Inspection Information

Inspection Begin Date:	8/30/2023	Inspection End Date:	8/31/2023
Arrival Time:	9:40 am (8/30), 9:15 am (8/31)	Departure Time:	4:45 pm (8/30), 2:15 pm (8/31)
Lead Inspector	Name:	Organization:	Phone No./Email:
	Manoj Patel	AECAB	312-353-3565
			patel.manojkumar@epa.gov
Participating Inspectors	Matthew Walters	AECAB	312-353-4724
			walters.matthew@epa.gov

Subpart A – General [68.10-15]

General requirements followed and implemented as in 40 CFR 68.10-15?
Comments: ACME Ice Company filed first RMP in 1999, Home City Ice did not take ownership of RMP after acquiring facility in 2021

General: Applicability [68.10]

1.	Has the owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under §68.115, complied with the requirements of this part no later than the latest of the following dates [68.10(a)]: ■ June 21, 1999? [68.10(a)(1)]; ☐ Three years after the date on which a regulated substance is first listed under §68.130? [68.10(a)(2)]; ☐ The date on which a regulated substance is first present above a threshold quantity in a process? [68.10(a)(3)]; or ☐ For any revisions to this part, the effective date of the final rule that revises this part? [68.10(a)(4)]	■Y	☐N	☐N/A
2.	Has the owner or operator complied with the emergency coordination activities in accordance with §68.93 by September 21, 2018? [68.10(b)] **(See Items 2 through 5 of Subpart E)**	☐Y	■N	☐N/A
3.	Has the owner or operator developed and implemented an emergency response program in accordance with §68.95 **within three years** of when the owner or operator determined that the stationary source is subject to the emergency response program requirements of §68.95? [68.10(c)] **(See Items 1.b.(2) – 1.b.(7) of Subpart E)**	☐Y	☐N	■N/A
4.	Has the owner or operator developed plans for conducting emergency response exercises in accordance with §68.96 by December 19, 2023? [68.10(d)] **(See Items 1.b.(8) – 1.b.(17), 6, and 7 of Subpart E)**	☐Y	☐N	■N/A
5.	Has the owner or operator complied with the public meeting requirement in §68.210(b) **within 90 days** of any RMP reportable accident at the stationary source with known offsite impacts specified in §68.42(a), that occurs after March 15, 2021? [68.10(e)] **(See Item 2 of Subpart H)**	☐Y	☐N	■N/A
6.	After December 19, 2024, has the owner or operator reported in the RMP submission: [68.10(f)] ☐ A public meeting after an RMP reportable accident under §68.160(b)(21)? [68.10(f)(1)]; ☐ Emergency response program information under §68.180(a)(1)? [68.10(f)(2)]; ☐ Emergency response program information under §68.180(a)(2) and (3)? [68.10(f)(3)]; and, ☐ Emergency response program and exercises information under §68.180(b), as applicable? Including submittal of the following: [68.10(f)(4)] ☐ Dates of the most recent notification, ☐ Dates of field and tabletop exercises in the risk management plan, ☐ Dates for exercises completed as required under §68.96 at the time the risk management plan is either submitted under §68.150(b)(2) or (3), or is updated under §68.190.	☐Y	☐N	■N/A

General: Program Eligibility [68.10(g)-(i)]

7. Does the covered process meet the eligibility requirements of Program 1? Specifically: [68.10(g)] Does the covered process meet **all** of the following requirements: ☐ For the five years prior to the submission of an RMP, the process has **not** had an accidental release of a regulated substance where exposure to the substance, its reaction products, overpressure generated by an explosion involving the substance, or radiant heat generated by a fire involving the substance led to any of the following offsite? [68.10(g)(1)]; ☐ Death; [68.10(g)(1)(i)] ☐ Injury; [68.10(g)(1)(ii)] or, ☐ Response or restoration activities for an exposure of an environmental receptor; [68.10(g)(1)(iii)] **and** ☐ The distance to a toxic or flammable endpoint for a worst-case release assessment conducted under subpart B and §68.25 is less than the distance to any public receptor, as defined in §68.3 [68.10(g)(2)]; **and** ☐ Emergency response procedures have been coordinated between the stationary source and local emergency planning and response organizations [68.10(g)(3)]	☐Y	■N	☐N/A
8. Does the covered process meet the eligibility requirements of Program 3? Specifically: [68.10(i)] ■ The process does not meet the eligibility requirements of Program 1. [68.10(i)]; **and** Is the covered process any of the following NAICS codes: [68.10(i)(1)] ☐ 32211, 32411, 32511, 325181, 325188, 325192, 325199, 325211, 325311, or 32532; **or** ■ Is the process subject to the OSHA process safety management standard, 29 CFR 1910.119? [68.10(i)(2)]	■Y	☐N	☐N/A
9. Does the covered process fail to meet the eligibility requirements of Program 1 and Program 3 (i.e., is the covered process a Program 2)? [68.10(h)]	☐Y	■N	☐N/A

General: Management [68.15]

Has the owner or operator:

10. Developed a management system to oversee the implementation of the risk management program elements? [68.15(a)]	☐Y	■N	☐N/A
11. Assigned a qualified person or position that has the overall responsibility for the development, implementation, and integration of the risk management program elements? [68.15(b)]	☐Y	■N	☐N/A
12. Documented other persons responsible for implementing individual requirements of the risk management program and defined the lines of authority through an organization chart or similar document? [68.15(c)]	☐Y	☐N	■N/A

Subpart B - Hazard Assessment [68.20-68.42]

Hazard assessment conducted and documented as provided in 40 CFR 68.20-68.42?
Comments: Assessment conducted by Lang Ice, Home City did not have documentation at time of inspection so below items left blank

Hazard Assessment: Offsite consequence analysis parameters [68.22]			
1. Used the following endpoints for offsite consequence analysis for a worst-case scenario: [68.22(a)] ☐ For toxics: the endpoints provided in Appendix A of 40 CFR Part 68? [68.22(a)(1)] ☐ For flammables: an explosion resulting in an overpressure of 1 psi? [68.22(a)(2)(i)]; or ☐ For flammables: a fire resulting in a radiant heat/exposure of 5 kw/m^2 for 40 seconds? [68.22(a)(2)(ii)] ☐ For flammables: a concentration resulting in a lower flammability limit, as provided in NFPA documents or other generally recognized sources? [68.22(a)(2)(iii)]	☐Y	☐N	☐N/A
2. Used the following endpoints for offsite consequence analysis for an alternative release scenario: [68.22(a)] ☐ For toxics: the endpoints provided in Appendix A of 40 CFR Part 68? [68.22(a)(1)] ☐ For flammables: an explosion resulting in an overpressure of 1 psi? [68.22(a)(2)(i)] ☐ For flammables: a fire resulting in a radiant heat/exposure of 5 kw/m^2 for 40 seconds? [68.22(a)(2)(ii)] ☐ For flammables: a concentration resulting in a lower flammability limit, as provided in NFPA documents or other generally recognized sources? [68.22(a)(2)(iii)]	☐Y	☐N	☐N/A
3. Used appropriate wind speeds and stability classes for the release analysis? [68.22(b)]	☐Y	☐N	☐N/A
4. Used appropriate ambient temperature and humidity values for the release analysis? [68.22(c)]	☐Y	☐N	☐N/A
5. Used appropriate values for the height of the release for the release analysis? [68.22(d)]	☐Y	☐N	☐N/A
6. Used appropriate surface roughness values for the release analysis? [68.22(e)]	☐Y	☐N	☐N/A
7. Do tables and models, used for dispersion analysis of toxic substances, appropriately account for dense or neutrally buoyant gases? [68.22(f)]	☐Y	☐N	☐N/A
8. Were liquids, other than gases liquefied by refrigeration only, considered to be released at the highest daily maximum temperature, based on data for the previous three years appropriate for a stationary source, or at process temperature, whichever is higher? [68.22(g)]	☐Y	☐N	☐N/A
Hazard Assessment: Worst-case release scenario analysis [68.25]			
9. Analyzed and reported in the RMP one worst-case release scenario estimated to create the greatest distance to an endpoint resulting from an accidental release of a regulated toxic substance from covered processes under worst-case conditions? [68.25(a)(2)(i)]	☐Y	☐N	☐N/A
10. Analyzed and reported in the RMP one worst-case release scenario estimated to create the greatest distance to an endpoint resulting from an accidental release of a regulated flammable substance from covered processes under worst-case conditions? [68.25(a)(2)(ii)]	☐Y	☐N	☐N/A
11. Analyzed and reported in the RMP additional worst-case release scenarios for a hazard class if the worst-case release from another covered process at the stationary source potentially affects public receptors different from those potentially affected by the worst-case release scenario developed under 68.25(a)(2)(i) or 68.25(a)(2)(ii)? [68.25(a)(2)(iii)]	☐Y	☐N	☐N/A
12. Has the owner or operator determined the worst-case release quantity to be the greater of the following: [68.25(b)] ☐ If released from a vessel, the greatest amount held in a single vessel, taking into account administrative controls that limit the maximum quantity? [68.25(b)(1)] ☐ If released from a pipe, the greatest amount held in the pipe, taking into account administrative controls that limit the maximum quantity? [68.25(b)(2)]	☐Y	☐N	☐N/A

13.a.	Has the owner or operator for toxic substances that are normally gases at ambient temperature and handled as a gas or liquid under pressure:			
13.a.(1)	Assumed the whole quantity in the vessel or pipe would be released as a gas over 10 minutes? [68.25(c)(1)]	☐Y	☐N	☐N/A
13.a.(2)	Assumed the release rate to be the total quantity divided by 10, if there are no passive mitigation systems in place? [68.25(c)(1)]	☐Y	☐N	☐N/A
13.b.	Has the owner or operator for toxic gases handled as refrigerated liquids at ambient pressure:			
13.b.(1)	Assumed the substance would be released as a gas in 10 minutes, if not contained by passive mitigation systems or if the contained pool would have a depth of 1 cm or less? [68.25(c)(2)(i)]	☐Y	☐N	☐N/A
13.b.(2)	If released substance would be contained by passive mitigation systems in a pool with a depth > 1 cm; ☐ Assumed the quantity in the vessel or pipe (as determined per 68.25(b)) would be spilled instantaneously to form a liquid pool? [68.25(c)(2)(ii)] ☐ Calculated the volatility rate at the boiling point of the substance and at the conditions specified in 68.25(d)? [68.25(c)(2)(ii)]	☐Y	☐N	☐N/A
13.c.	Has the owner or operator for toxic substances that are normally liquids at ambient temperature:			
13.c.(1)	Assumed the quantity in the vessel or pipe would be spilled instantaneously to form a liquid pool? [68.25(d)(1)]	☐Y	☐N	☐N/A
13.c.(2)	Determined the surface area of the pool by assuming that the liquid spreads to 1 cm deep, if there is no passive mitigation system in place that would serve to contain the spill and limit the surface area, or if passive mitigation is in place, was the surface area of the contained liquid used to calculate the volatilization rate? [68.25(d)(1)(i)]	☐Y	☐N	☐N/A
13.c.(3)	Taken into account the actual surface characteristics, if the release would occur onto a surface that is not paved or smooth? [68.25(d)(1)(ii)]	☐Y	☐N	☐N/A
13.c.(4)	Determined the volatilization rate by accounting for the highest daily maximum temperature in the past three years, the temperature of the substance in the vessel, and the concentration of the substance if the liquid spilled is a mixture or solution? [68.25(d)(2)]	☐Y	☐N	☐N/A
13.c.(5)	Determined the rate of release to air from the volatilization rate of the liquid pool? [68.25(d)(3)]	☐Y	☐N	☐N/A
13.c.(6)	Determined the rate of release to air by using the methodology in the RMP Offsite Consequence Analysis Guidance, any other publicly available techniques that account for the modeling conditions and are recognized by industry as applicable as part of current practices, or proprietary models that account for the modeling conditions may be used provided the owner or operator allows the implementing agency access to the model and describes model features and differences from publicly available models to local emergency planners upon request? [68.25(d)(3)] What modeling technique did the owner or operator use? [68.25(g)] _____	☐Y	☐N	☐N/A
13.d.	Has the owner or operator for flammable gases:			
13.d.(1)	Assumed the quantity in a vessel(s) of flammable gas held as a gas or liquid under pressure is released as a gas over 10 minutes resulting in a vapor cloud explosion? [68.25(e)(1)]	☐Y	☐N	☐N/A
13.d.(2)	For gas handled as refrigerated liquid that is not contained by passive mitigation systems, assumed the total quantity in a vessel(s) of refrigerated liquid is released as a gas over 10 minutes resulting in a vapor cloud explosion? [68.25(e)(2)(i)]	☐Y	☐N	☐N/A
13.d.(3)	For gas handled as refrigerated liquid released to a contained area, assumed the quantity volatilized in 10 minutes results in a vapor cloud? [68.25(e)(2)(ii)]	☐Y	☐N	☐N/A

13.d.(4) Assumed a yield factor of 10% of the available energy is released in the explosion for determining the distance to the explosion endpoint, if the model used is based on TNT-equivalent methods? [68.25(e)]	☐Y	☐N	☐N/A
13.e. Has the owner or operator for <u>flammable liquids:</u>			
13.e.(1) Assumed the entire quantity in the vessel or pipe, taking into account administrative controls that limit the maximum quantity, would be spilled instantaneously to form a liquid pool? [68.25(f)(1)]	☐Y	☐N	☐N/A
13.e.(2) For liquids at temperatures below their atmospheric boiling point, calculated the volatility rate at the boiling point of the substance and at the conditions specified in 68.25(d) and assumed that the quantity which becomes vapor in the first 10 minutes is involved in the vapor cloud explosion? [68.25(f)(1)-(2)]	☐Y	☐N	☐N/A
13.e.(3) Assumed a yield factor of 10% of the available energy is released in the explosion for determining the distance to the explosion endpoint, if the model used is based on TNT-equivalent methods? [68.25(f)]	☐Y	☐N	☐N/A
14. Used the parameters defined in 68.22 to determine distance to the endpoints? [68.25(g)]	☐Y	☐N	☐N/A
15. Determined the rate of release to air by using the methodology in the RMP Offsite Consequence Analysis Guidance, any other publicly available techniques that account for the modeling conditions and are recognized by industry as applicable as part of current practices, or proprietary models that account for the modeling conditions may be used provided the owner or operator allows the implementing agency access to the model and describes model features and differences from publicly available models to local emergency planners upon request? [68.25(g)] What modeling technique did the owner or operator use? [68.25(g)] _____	☐Y	☐N	☐N/A
16. Ensured that the passive mitigation system, if considered, is capable of withstanding the release event triggering the scenario and will still function as intended? [68.25(h)]	☐Y	☐N	☐N/A
17. Considered also the following factors in selecting the worst-case release scenarios: [68.25(i)] ☐ Smaller quantities handled at higher process temperature or pressure? [68.25(i)(1)] ☐ Proximity to the boundary of the stationary source? [68.25(i)(2)]	☐Y	☐N	☐N/A
Hazard Assessment: Alternative release scenario analysis [68.28]			
18. Identified and analyzed at least one alternative release scenario for each regulated toxic substance held in a covered process(es) and at least one alternative release scenario to represent all flammable substances held in covered processes? [68.28(a)]	☐Y	☐N	☐N/A
19. Selected a scenario: [68.28(b)] ☐ That is more likely to occur than the worst-case release scenario under 68.25? [68.28(b)(1)(i)] ☐ That will reach an endpoint off-site, unless no such scenario exists? [68.28(b)(1)(ii)]	☐Y	☐N	☐N/A
20. Considered release scenarios which included, but are not limited to, the following: [68.28(b)(2)] ☐ Transfer hose releases due to splits or sudden hose uncoupling? [68.28(b)(2)(i)] ☐ Process piping releases from failures at flanges, joints, welds, valves and valve seals, and drains or bleeds? [68.28(b)(2)(ii)] ☐ Process vessel or pump releases due to cracks, seal failure, or drain, bleed, or plug failure? [68.28(b)(2)(iii)] ☐ Vessel overfilling and spill, or overpressurization and venting through relief valves or rupture disks? [68.28(b)(2)(iv)] ☐ Shipping container mishandling and breakage or puncturing leading to a spill? [68.28(b)(2)(v)]	☐Y	☐N	☐N/A
21. Used the parameters defined in 68.22 to determine distance to the endpoints? [68.28(c)]	☐Y	☐N	☐N/A

22. Determined the rate of release to air by using the methodology in the RMP Offsite Consequence Analysis Guidance, any other publicly available techniques that account for the modeling conditions and are recognized by industry as applicable as part of current practices, or proprietary models that account for the modeling conditions may be used provided the owner or operator allows the implementing agency access to the model and describes model features and differences from publicly available models to local emergency planners upon request? [68.28(c)] What modeling technique did the owner or operator use? [68.25(g)] _____	☐Y	☐N	☐N/A
23. Ensured that the passive and active mitigation systems, if considered, are capable of withstanding the release event triggering the scenario and will be functional? [68.28(d)]	☐Y	☐N	☐N/A
24. Considered the following factors in selecting the alternative release scenarios: [68.28(e)] ☐ The five-year accident history provided in 68.42? [68.28(e)(1)] ☐ Failure scenarios identified under 68.50? [68.28(e)(2)]	☐Y	☐N	☐N/A
Hazard Assessment: Defining off-site impacts–Population [68.30]			
25. Estimated population that would be included within a circle where its center is the point of the release and a radius determined by the distance to the endpoint? [68.30(a)]	☐Y	☐N	☐N/A
26. Identified the presence of institutions, parks and recreational areas, major commercial, office, and industrial buildings in the RMP? [68.30(b)]	☐Y	☐N	☐N/A
27. Used most recent Census data, or other updated information to estimate the population? [68.30(c)]	☐Y	☐N	☐N/A
28. Estimated the population to two significant digits? [68.30(d)]	☐Y	☐N	☐N/A
Hazard Assessment: Defining off-site impacts–Environment [68.33]			
29. Identified environmental receptors within a circle where its center is the point of the release and a radius determined by the distance to the endpoint? [68.33(a)]	☐Y	☐N	☐N/A
30. Relied on information provided on local U.S.G.S. maps, or on any data source containing U.S.G.S. data to identify environmental receptors? [Source may have used LandView to obtain information] [68.33(b)]	☐Y	☐N	☐N/A
Hazard Assessment: Review and update [68.36]			
31. Reviewed and updated the off-site consequence analyses at least once every five years? [68.36(a)]	☐Y	☐N	☐N/A
32. Completed a revised analysis and submit a revised RMP within six months of a change in processes, quantities stored or handled, or any other aspect that might reasonably be expected to increase or decrease the distance to the endpoint by a factor of two or more? [68.36(b)]	☐Y	☐N	☐N/A
Hazard Assessment: Documentation [68.39]			
33. Has the owner or operator maintained the following records on the offsite consequence analyses:			
33.a For worst-case scenarios: a description of the vessel or pipeline and substance selected, assumptions and parameters used, the rationale for selection, and anticipated effect of the administrative controls and passive mitigation on the release quantity and rate? [68.39(a)]	☐Y	■N	☐N/A
33.b For alternative release scenarios: a description of the scenarios identified, assumptions and parameters used, the rationale for the selection of specific scenarios, and anticipated effect of the administrative controls and mitigation on the release quantity and rate? [68.39(b)]	☐Y	■N	☐N/A
33.c Documentation of estimated quantity released, release rate, and duration of release? [68.39(c)]	☐Y	■N	☐N/A
33.d Methodology used to determine distance to endpoints? [68.39(d)]	☐Y	■N	☐N/A

33.e Data used to estimate population and environmental receptors potentially affected? [68.39(e)]	☐Y	■N	☐N/A

Hazard Assessment: Five-year accident history [68.42]

34. Has the owner or operator included all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage? [68.42(a)]	☐Y	☐N	■N/A
35. Has the owner or operator reported the following information for each accidental release: [68.42(b)] ☐ Date, time, and approximate duration of the release? [68.42(b)(1)] ☐ Chemical(s) released? [68.42(b)(2)] ☐ Estimated quantity released in pounds and percentage weight in a mixture (toxics)? [68.42(b)(3)] ☐ NAICS code for the process? [68.42(b)(4)] ☐ The type of release event and its source? [68.42(b)(5)] ☐ Weather conditions (if known)? [68.42(b)(6)] ☐ On-site impacts? [68.42(b)(7)] ☐ Known offsite impacts? [68.42(b)(8)] ☐ Initiating event and contributing factors (if known)? [68.42(b)(9)] ☐ Whether offsite responders were notified (if known)? [68.42(b)(10)] ☐ Operational or process changes that resulted from investigation of the release? [68.42(b)(11)]	☐Y	☐N	■N/A

Subpart D - Program 3 Prevention Program [68.65-68.87]

Implemented the Program 3 prevention requirements as provided in 40 CFR 68.48 - 68.60?
Comments:

Prevention Program: Process safety information [68.65]

1. Has the owner or operator compiled written process safety information, which includes information pertaining to the hazards of the regulated substances used or produced by the process, information pertaining to the technology of the process, and information pertaining to the equipment in the process, before conducting any process hazard analysis required by the rule? [68.65(a)] Does the process safety information contain the following for hazards of the substances: [68.65(b)] ■ Toxicity information? [68.65(b)(1)] ■ Permissible exposure limits? [68.65(b)(2)] ■ Physical data? [68.65(b)(3)] ■ Reactivity data? [68.65(b)(4)] ■ Corrosivity data? [68.65(b)(5)] ■ Thermal and chemical stability data? [68.65(b)(6)] ■ Hazardous effects of inadvertent mixing of materials that could foreseeably occur? [68.65(b)(7)] Note: Safety Data Sheets (SDS) meeting the requirements of the OSHA Hazard Communication Standard [29 CFR 1910.1200(g)] may be used to comply with this requirement to the extent they contain the information required by 68.65(b).	■Y	☐N	☐N/A

2. Does the process safety information contain information pertaining to technology of the process [68.65(c)]? Does the information concerning the technology of the process include the following: [68.65(c)(1)] ☐ A block flow diagram or simplified process flow diagram? [68.65(c)(1)(i)] ☐ Process chemistry? [68.65(c)(1)(ii)] ☐ Maximum intended inventory? [68.65(c)(1)(iii)] ☐ Safe upper and lower limits for such items as temperatures, pressures, flows, or compositions? [68.65(c)(1)(iv)] ☐ An evaluation of the consequences of deviation? [68.65(c)(1)(iv)]	☐Y	■N	☐N/A
3. Does the process safety information contain information pertaining to the equipment in the process? [68.65(d)] Does the information pertaining to the equipment in the process include the following: [68.65(d)(1)] ☐ Materials of construction? 68.65(d)(1)(i)] ☐ Piping and instrumentation diagrams [68.65(d)(1)(ii)] ☐ Electrical classification? [68.65(d)(1)(iii)] ☐ Relief system design and design basis? [68.65(d)(1)(iv)] ☐ Ventilation system design? [68.65(d)(1)(v)] ☐ Design codes and standards employed? [68.65(d)(1)(vi)] ☐ Material and energy balances for processes built after June 21, 1999? [68.65(d)(1)(vii)] ☐ Safety systems? [68.65(d)(1)(viii)]	☐Y	■N	☐N/A
4. Has the owner or operator documented that equipment complies with recognized and generally accepted good engineering practices? [68.65(d)(2)]	☐Y	■N	☐N/A
5. Has the owner or operator determined and documented that existing equipment, designed and constructed in accordance with codes, standards, or practices that are no longer in general use, is designed, maintained, inspected, tested, and operating in a safe manner? [68.65(d)(3)]	☐Y	■N	☐N/A
Prevention Program: Process hazard analysis [68.67]			
6. Has the owner or operator performed an initial process hazard analysis (PHA), and has this analysis identified, evaluated, and controlled the hazards involved in the process? [68.67(a)]	☐Y	■N	☐N/A
7. Has the owner or operator determined and documented the priority order for conducting PHAs, and was it based on an appropriate rationale? [68.67(a)]	☐Y	☐N	■N/A
8. Has the owner used one or more of the following technologies to conduct process PHA: [68.67(b)] ■ What-if? [68.67(b)(1)] ☐ Checklist? [68.67(b)(2)] ☐ What-if/Checklist? [68.67(b)(3)] ☐ Hazard and Operability Study (HAZOP) [68.67(b)(4)] ☐ Failure Mode and Effects Analysis (FMEA) [68.67(b)(5)] ☐ Fault Tree Analysis? [68.67(b)(6)] ☐ An appropriate equivalent methodology? [68.67(b)(7)]	■Y	☐N	☐N/A

9. Did the PHA address: ☐ The hazards of the process? [68.67(c)(1)] ☐ Identification of any incident that had a likely potential for catastrophic consequences? [68.67(c)(2)] ☐ Engineering and administrative controls applicable to hazards and interrelationships?[68.67(c)(3)] ☐ Consequences of failure of engineering and administrative controls? [68.67(c)(4)] ☐ Stationary source siting? [68.67(c)(5)] ☐ Human factors? [68.67(c)(6)] ☐ A qualitative evaluation of a range of the possible safety and health effects of failure of controls? [68.67(c)(7)]	☐Y ■N ☐N/A
10. Was the PHA performed by a team with expertise in engineering and process operations and did the team include at least one employee who has experience and knowledge specific to the process being evaluated and at least one member of the team who is knowledgeable in the specific process hazard analysis methodology being used?? [68.67(d)]	☐Y ■N ☐N/A
11. Has the owner or operator completed the following: [68.67(e)] ☐ Established a system to promptly address the team's findings and recommendations? ☐ Assured that the recommendations are resolved in a timely manner and documented? ☐ Documented what actions are to be taken? ☐ Completed actions as soon as possible? ☐ Developed a written schedule of when these actions are to be completed? and ☐ Communicated the actions to operating, maintenance, and other employees whose work assignments are in the process and who may be affected by the recommendations?	☐Y ■N ☐N/A
12. Has the PHA been updated and revalidated by a team every five years after the completion of the initial PHA to assure that the PHA is consistent with the current process? [68.67(f)]	☐Y ■N ☐N/A
13. Has the owner or operator retained PHAs and updates or revalidations for each process covered, as well as the resolution of recommendations for the life of the process? [68.67(g)]	☐Y ■N ☐N/A
Prevention Program: Operating procedures [68.69]	
14. Has the owner or operator developed and implemented written operating procedures that provide instructions or steps for conducting activities associated with each covered process consistent with the safety information? [68.69(a)]	☐Y ■N ☐N/A

15. Do the procedures address the following: [68.69(a)] Steps for each operating phase: [68.69(a)(1)] ☐ Initial Startup? [68.69(a)(1)(i)] ☐ Normal operations? [68.69(a)(1)(ii)] ☐ Temporary operations? [68.69((a)(1)(iii)] ☐ Emergency shutdown including the conditions under which emergency shutdown is required, and the assignment of shutdown responsibility to qualified operators to ensure that emergency shutdown is executed in a safe and timely manner? [68.69(a)(1)(iv)] ☐ Emergency operations? [68.69(a)(1)(v)] ☐ Normal shutdown? [68.68(a)(1)(vi)] ☐ Startup following a turnaround, or after emergency shutdown? [68.69(a)(1)(vii)] Operating limits: [68.69(a)(2)] ☐ Consequences of deviations [68.69(a)(2)(i)] ☐ Steps required to correct or avoid deviation? [68.69(a)(2)(ii)] Safety and health considerations: [68.69(a)(3)] ☐ Properties of, and physical hazards presented by, the chemicals used in the process [68.69(a)(3)(i)] ☐ Precautions necessary to prevent exposure, including engineering controls, administrative controls, and personal protective equipment? [68.69(a)(3)(ii)] ☐ Control measures to be taken if physical contact or airborne exposure occurs? [68.69(a)(3)(iii)] ☐ Quality control for raw materials and control of hazardous chemical inventory levels? [68.69(a)(3)(iv)] ☐ Any special or unique hazards? [68.69(a)(3)(v)] ☐ Safety systems and their functions? [68.69(a)(4)]	☐Y	■N	☐N/A
16. Are operating procedures readily accessible to employees who are involved in a process? [68.69(b)]	☐Y	■N	☐N/A
17. Has the owner or operator certified annually that the operating procedures are current and accurate and that procedures have been reviewed as often as necessary to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to stationary sources? [68.69(c)]	☐Y	■N	☐N/A
18. Has the owner or operator developed and implemented safe work practices to provide for the control of hazards during specific operations, such as lockout/tagout; confined space entry; opening process equipment or piping; and control over entrance into a stationary source by maintenance, contractor, laboratory, or other support personnel? [68.69(d)]	☐Y	■N	☐N/A
Prevention Program: Training [68.71]			
19. Has each employee involved in operating a process, and each employee before being involved in operating a newly assigned process, been initially trained in an overview of the process and in the operating procedures? [68.71(a)(1)]	☐Y	■N	☐N/A
20. Did initial training include emphasis on safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks? [68.71(a)(1)]	☐Y	■N	☐N/A
21. In lieu of initial training for those employees already involved in operating a process on June 21, 1999, an owner or operator may certify in writing that the employee has the required knowledge, skills, and abilities to safely carry out the duties and responsibilities as specified in the operating procedures [68.71(a)(2)]	☐Y	■N	☐N/A

22. Has refresher training been provided at least every three years, or more often if necessary, to each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process? [68.71(b)]	☐Y	■N	☐N/A
23. Has owner or operator ascertained and documented in record that each employee involved in operating a process has received and understood the training required? [68.71(c)]	☐Y	■N	☐N/A
24. Does the prepared record contain the identity of the employee, the date of the training, and the means used to verify that the employee understood the training? [68.71(c)]	☐Y	■N	☐N/A
Prevention Program: Mechanical integrity [68.73]			
25. Has the owner or operator established and implemented written procedures to maintain the on-going integrity of the process equipment listed in 68.73(a)? [68.73(b)]	☐Y	■N	☐N/A
26. Has the owner or operator trained each employee involved in maintaining the on-going integrity of process equipment? [68.73(c)]	☐Y	■N	☐N/A
27. Has the owner or operator performed inspections and tests on process equipment? [68.73(d)(1)]	☐Y	■N	☐N/A
28. Has the owner or operator followed recognized and generally accepted good engineering practices for inspections and testing procedures? [68.73(d)(2)]	☐Y	■N	☐N/A
29. Has the owner or operator ensured the frequency of inspections and tests of process equipment is consistent with applicable manufacturers' recommendations, good engineering practices, and prior operating experience? [68.73(d)(3)]	☐Y	■N	☐N/A
30. Has the owner or operator documented each inspection and test that had been performed on process equipment, and identified the following: [68.73(d)(4)] ☐ The date of the inspection or test? ☐ The name of the person who performed the inspection or test? ☐ The serial number or other identifier of the equipment on which the inspection or test was performed? ☐ A description of the inspection or test performed? and ☐ The results of the inspection or test?	☐Y	■N	☐N/A
31. Has the owner or operator corrected deficiencies in equipment that were outside acceptable limits defined by the process safety information before further use or in a safe and timely manner when necessary means were taken to assure safe operation? [68.73(e)]	☐Y	■N	☐N/A
32. Has the owner or operator assured that equipment as it was fabricated is suitable for the process application for which it will be used in the construction of new plants and equipment? [68.73(f)(1)]	☐Y	■N	☐N/A
33. Has the owner or operator performed appropriate checks and inspections to assure that equipment was installed properly and consistent with design specifications and the manufacturer's instructions? [68.73(f)(2)]	☐Y	■N	☐N/A
34. Has the owner or operator assured that maintenance materials, spare parts and equipment were suitable for the process application for which they would be used? [68.73(f)(3)]	☐Y	■N	☐N/A
Prevention Program: Management of change [68.75]			
35. Has the owner or operator established and implemented written procedures to manage changes to process chemicals, technology, equipment, and procedures, and changes to stationary sources that affect a covered process? [68.75(a)]	☐Y	■N	☐N/A

36. Do procedures assure that the following considerations are addressed prior to any change: [68.75(b)] ☐ The technical basis for the proposed change? [68.75(b)(1)] ☐ Impact of change on safety and health? [68.75(b)(2)] ☐ Modifications to operating procedures? [68.75(b)(3)] ☐ Necessary time period for the change? [68.75(b)(4)] ☐ Authorization requirements for the proposed change? [68.75(b)(5)]	☐Y	■N	☐N/A
37. Were employees, involved in operating a process and maintenance, and contract employees, whose job tasks would be affected by a change in the process, informed of, and trained in, the change prior to start-up of the process or affected parts of the process? [68.75(c)]	☐Y	■N	☐N/A
38. If a change resulted in a change in the process safety information, was such information updated accordingly? [68.75(d)]	☐Y	■N	☐N/A
39. If a change resulted in a change in the operating procedures or practices, had such procedures or practices been updated accordingly? [68.75(e)]	☐Y	■N	☐N/A
Prevention Program: Pre-startup safety review [68.77]			
40. Has the owner or operator performed a pre-startup safety review for new stationary sources and for modified stationary sources when the modification is significant enough to require a change in the process safety information? [68.77(a)]	☐Y	■N	☐N/A
41. Does the pre-startup safety review confirm the following prior to the introduction of a regulated substance to a process: [68.77(b)] ☐ Construction and equipment was in accordance with design specifications? [68.77(b)(1)] ☐ Safety, operating, maintenance, and emergency procedures were in place and were adequate? [68.77(b)(2)] ☐ For new stationary sources, a process hazard analysis had been performed and recommendations had been resolved or implemented before startup? [68.77(b)(3)] ☐ Modified stationary sources meet the requirements contained in management of change? [68.77(b)(3)] ☐ Training of each employee involved in operating a process had been completed? [68.77(b)(4)]	☐Y	■N	☐N/A
Prevention Program: Compliance audits [68.79]			
42. Has the owner or operator certified that the stationary source has evaluated compliance with the provisions of the prevention program at least every three years to verify that the developed procedures and practices are adequate and being followed? [68.79(a)]	☐Y	■N	☐N/A
43. Has the audit been conducted by at least one person knowledgeable in the process? [68.79(b)]	☐Y	■N	☐N/A
44. Are the audit findings documented in a report? [68.79(c)]	☐Y	■N	☐N/A
45. Has the owner or operator promptly determined and documented an appropriate response to each of the findings of the audit and documented that deficiencies had been corrected? [68.79(d)]	☐Y	■N	☐N/A
46. Has the owner or operator retained the two most recent compliance reports? [68.79(e)]	☐Y	■N	☐N/A
Prevention Program: Incident investigation [68.81]			
47. Has the owner or operator investigated each incident that resulted in, or could reasonably have resulted in a catastrophic release of a regulated substance? [68.81(a)]	☐Y	■N	☐N/A

48. Were all incident investigations initiated not later than 48 hours following the incident? [68.81(b)]	■Y ☐N ☐N/A
49. Was an accident investigation team established and did it consist of at least one person knowledgeable in the process involved, including a contract employee if the incident involved work of a contractor, and other persons with appropriate knowledge and experience to thoroughly investigate and analyze the incident? [68.81(c)]	■Y ☐N ☐N/A
50. Was a report prepared at the conclusion of every investigation? [68.81(d)]	☐Y ■N ☐N/A
51. Does every report include: [68.81(d)] ☐ Date of incident? [68.81(d)(1)] ☐ Date investigation began? [68.81(d)(2)] ☐ A description of the incident? [68.81(d)(3)] ☐ The factors that contributed to the incident? [68.81(d)(4)] ☐ Any recommendations resulting from the investigation? [68.81(d)(5)]	☐Y ☐N ■N/A
52. Has the owner or operator established a system to promptly address and resolve the incident report findings and recommendations, and are the resolutions and corrective actions documented? [68.81(e)]	☐Y ■N ☐N/A
53. Was the report reviewed with all affected personnel whose job tasks are relevant to the incident findings including contract employees where applicable? [68.81(f)]	☐Y ■N ☐N/A
54. Has the owner or operator retained incident investigation reports for at least five years? [68.81(g)]	☐Y ☐N ■N/A
Prevention Program: Employee participation [68.83]	
55. Has the owner or operator developed a written plan of action regarding the implementation of the employee participation required by this section? [68.83(a)]	☐Y ■N ☐N/A
56. Has the owner or operator consulted with employees and their representatives on the conduct and development of process hazards analyses and on the development of the other elements of process safety management in chemical accident prevention provisions? [68.83(b)]	☐Y ■N ☐N/A
57. Has the owner or operator provided to employees and their representatives access to process hazards analyses and to all other information required to be developed under the chemical accident prevention rule? [68.83(c)]	☐Y ■N ☐N/A
Prevention Program: Hot work permit [68.85]	
58. Has the owner or operator issued a hot work permit for each hot work operation conducted on or near a covered process? [68.85(a)]	☐Y ■N ☐N/A
59. Does the permit document that the fire prevention and protection requirements in 29CFR 1910.252(a) have been implemented prior to beginning the hot work operations? [68.85(b)]	☐Y ■N ☐N/A
60. Does the permit indicate the date(s) authorized for hot work and the object(s) upon which hot work is to be performed? [68.85(b)]	☐Y ■N ☐N/A
61. Are the permits being kept on file until completion of the hot work operations? [68.85(b)]	☐Y ■N ☐N/A
Prevention Program: Contractors [68.87]	
62. Has the owner or operator obtained and evaluated information regarding the contract owner or operator's safety performance and programs when selecting a contractor? [68.87(b)(1)]	☐Y ■N ☐N/A
63. Has the owner or operator informed contract owner or operator of the known potential fire, explosion, or toxic release hazards related to the contractor's work and the process? [68.87(b)(2)]	☐Y ■N ☐N/A

64. Has the owner or operator explained to the contract owner or operator the applicable provisions of the emergency response or the emergency action program? [68.87(b)(3)]	☐Y	■N	☐N/A
65. Has the owner or operator developed and implemented safe work practices consistent with §68.69(d), to control the entrance, presence, and exit of the contract owner or operator and contract employees in the covered process areas? [68.87(b)(4)]	☐Y	■N	☐N/A
66. Periodically evaluated the performance of the contract owner or operator in fulfilling their obligations (as described at 68.87(c)(1) – (c)(5))? [68.87(b)(5)]	☐Y	■N	☐N/A

Subpart E - Emergency Response [68.90 - 68.96]

Developed and implemented an emergency response program as provided in 40 CFR 68.90-68.96?
Comments: Response activities coordinated after July 2023 release

1. Is the facility designated as a "responding stationary source"?	☐Y	■N	☐N/A
1.a. If the facility is **not** a responding stationary source, it need not comply with §68.95 if the following conditions are met:			
1.a.(1) For stationary sources with any regulated substances held in a process above threshold quantities, is the source included in the community emergency response plan developed under 42 U.S.C. 11003? [68.90(b)(1)]	☐Y	■N	☐N/A
1.a.(2) For stationary sources with only regulated flammable substances held in a process above threshold quantities, has the owner or operator coordinated response actions with the local fire department? [68.90(b)(2)]	☐Y	☐N	■N/A
1.a.(3) Are appropriate mechanisms in place to notify emergency responders when there is need for a response? [68.90(b)(3)]	■Y	☐N	☐N/A
1.a.(4) As of September 21, 2018, has the owner or operator performed the annual emergency response coordination activities required under § 68.93? [68.90(b)(4)] **(See Items 2 through 5)**	☐Y	■N	☐N/A
1.a.(5) Has the owner or operator performed the annual notification exercises required under § 68.96(a) before December 19, 2024? [68.90(b)(5)] **(See Items 6 and 7)**	☐Y	☐N	■N/A
For non-responding stationary sources where 1.a.(1)-(5) are all marked as 'Y', proceed to Subpart E Item 2			
1.b. If the facility is a responding stationary source:			
1.b.(1) Has the owner or operator developed and implemented an emergency response program that includes the elements required in § 68.95(a)(1-4)? [68.95(a)] **(See Items 1.b.(2) – 1.b.(5))**	☐Y	☐N	■N/A
1.b.(2). An emergency response plan is maintained at the stationary source and contains the following? [68.95(a)(1)] ☐ Procedures for informing the public and the appropriate Federal, state, and local emergency response agencies about accidental releases? [68.95(a)(1)(i)] ☐ Documentation of proper first-aid and emergency medical treatment necessary to treat accidental human exposures? [68.95(a)(1)(ii)] ☐ Procedures and measures for emergency response after an accidental release of a regulated substance? [68.95(a)(1)(iii)]	☐Y	☐N	■N/A
1.b.(3) Does the emergency response program contains procedures for the use of emergency response equipment and for its inspection, testing, and maintenance? [68.95(a)(2)]	☐Y	☐N	■N/A
1.b.(4) Does the emergency response program include training for all employees in relevant procedures? [68.95(a)(3)]	☐Y	☐N	■N/A
1.b.(5) Does the emergency response program include procedures to review and update, as appropriate, the emergency response plan to reflect changes at the stationary source and ensure that employees are informed of changes? [68.95(a)(4)]	☐Y	☐N	■N/A

1.b.(6)	Does the emergency response program include a written plan that complies with other Federal contingency plan regulations or is consistent with the approach in the National Response Team's Integrated Contingency Plan Guidance (''One Plan'')? If so, does the plan include the elements provided in paragraph (a) of 68.95, and also complies with paragraph (c) of 68.95? [68.95(b)]	☐Y	☐N	■N/A
1.b.(7)	Has the emergency response plan been coordinated with the community emergency response plan developed under EPCRA? [68.95(c)]	☐Y	☐N	■N/A
1.b.(8)	Has the owner or operator developed and implemented an exercise program for its emergency response program, including the emergency plan required under § 68.95(a)(1)? [68.96(b)]	☐Y	☐N	■N/A
1.b.(9)	Do the exercises involve facility emergency response personnel and, as appropriate, emergency response contractors? [68.96(b)]	☐Y	☐N	■N/A
1.b.(10)	When planning emergency response field and tabletop exercises, has the owner or operator coordinated with local public emergency response officials and invite them to participate in the exercise? [68.96(b)]	☐Y	☐N	■N/A
1.b.(11)	Does the emergency response exercise program include: [68.96(b)] ☐ Emergency response field exercises? [68.96(b)(1)] ☐ Tabletop exercises? [68.96(b)(2)] ☐ Documentation? [68.96(b)(3)]	☐Y	☐N	■N/A
1.b.(12)	As part of coordination with local emergency response officials, has the owner or operator consulted with these officials to establish an appropriate frequency for field exercises? [68.96(b)(1)(i)]	☐Y	☐N	■N/A
1.b.(13)	Field exercises shall involve tests of the source's emergency response plan, including deployment of emergency response personnel and equipment. Do field exercises include: [68.96(b)(1)(ii)] ☐ Tests of procedures to notify the public and the appropriate Federal, state, and local emergency response agencies about an accidental release? ☐ Tests of procedures and measures for emergency response actions including evacuations and medical treatment? ☐ Tests of communications systems? ☐ Mobilization of facility emergency response personnel, including contractors, as appropriate? ☐ Coordination with local emergency responders? ☐ Emergency response equipment deployment? ☐ Any other action identified in the emergency response program, as appropriate?	☐Y	☐N	■N/A
1.b.(14)	As part of coordination with local emergency response officials, has the owner or operator consulted with these officials to establish an appropriate frequency for tabletop exercises and conducted a tabletop exercise before December 21, 2026 and at a minimum of at least once every three years thereafter? [68.96(b)(2)(i)]	☐Y	☐N	■N/A
1.b.(15)	Tabletop exercises shall involve discussions of the source's emergency response plan. Do the exercises include discussions of: [68.96(b)(2)(ii)] ☐ Procedures to notify the public and the appropriate Federal, state, and local emergency response agencies? ☐ Procedures and measures for emergency response including evacuations and medical treatment? ☐ Identification of facility emergency response personnel and/or contractors and their responsibilities? ☐ Coordination with local emergency responders? ☐ Procedures for emergency response equipment deployment? ☐ Any other action identified in the emergency response plan, as appropriate?	☐Y	☐N	■N/A

1.b.(16) Has the owner or operator prepared an evaluation report within 90 days of each field and tabletop exercise, which included: [68.96(b)(3)] ☐ A description of the exercise scenario? ☐ Names and organizations of each participant? ☐ An evaluation of the exercise results including lessons learned? ☐ Recommendations for improvement or revisions to the emergency response exercise program and emergency response program, and a schedule to promptly address and resolve recommendations?	☐Y ☐N ■N/A
1.b.(17) Has the owner or operator satisfied the requirement to conduct notification, field and/or tabletop exercises through alternative means such as: [68.96(c)] ☐ Exercises conducted to meet other Federal, state, or local exercise requirements, provided the exercise meets the requirements of paragraphs (a) and/or (b) of this section, as appropriate. [68.96(c)(1)] ☐ Response to an accidental release, provided the response includes the actions indicated in paragraphs (a) and/or (b) of this section, as appropriate. When used to meet field and/or tabletop exercise requirements, the owner or operator shall prepare an after-action report comparable to the exercise evaluation report required in paragraph (b)(3) of this section, within 90 days of the incident. [68.96(c)(2)]	☐Y ☐N ■N/A
For all responding and non-responding stationary sources:	
2. Has the owner or operator of a stationary source coordinated response needs with local emergency planning and response organizations to determine how the stationary source is addressed in the community emergency response plan and to ensure that local response organizations are aware of the regulated substances at the stationary source, their quantities, the risks presented by covered processes, and the resources and capabilities at the stationary source to respond to an accidental release of a regulated substance? [68.93(a)]	☐Y ■N ☐N/A
3. Has coordination occurred at least annually, and more frequently if necessary, to address changes: At the stationary source; in the stationary source's emergency response and/or emergency action plan; and/or in the community emergency response plan? [68.93(a)]	☐Y ■N ☐N/A
4. Has coordination included providing to the local emergency planning and response organizations? [68.93(b)] ☐ The stationary source's emergency response plan if one exists? ☐ Emergency action plan? ☐ Updated emergency contact information? ☐ Other information necessary for developing and implementing the local emergency response plan? ☐ For responding stationary sources, has facility consulted with local emergency response officials to establish appropriate schedules and plans for field and tabletop exercises required under §68.96(b)? **(See Items 1.b.(8), 1.b.(10), 1.b.(12), and 1.b.(14))**	☐Y ■N ☐N/A
5. As of September 21, 2018, has the owner or operator documented coordination with local authorities, including: [68.93(c)] ☐ The names of individuals involved and their contact information (phone number, email address, and organizational affiliations)? ☐ Dates of coordination activities? ☐ Nature of coordination activities?	☐Y ■N ☐N/A
6. Has the owner or operator of a stationary source with any Program 2 or Program 3 process conducted an exercise of the stationary source's emergency response notification mechanisms before December 19, 2024 and annually thereafter? [68.96(a)] (Owners or operators of responding stationary sources may perform the notification exercise as part of the tabletop and field exercises)	☐Y ☐N ■N/A

7. Has the owner/operator maintained a written record of each notification exercise conducted over the last five years? [68.96(a)]	☐Y	■N	☐N/A

Subpart G – Risk Management Plan [40 CFR 68.150 – 68.195]

Documented a Risk Management Plan as provided in 40 CFR 68.150-68.195?
Comments: Home City did not take ownership of the active RMP when the facility was acquired from Lang Ice, Subpart G left blank

1. Does the single registration form include, for each covered process: [68.160(b)(7)] ☐ The name and CAS number of each regulated substance held above the threshold quantity in the process? ☐ The maximum quantity of each regulated substance or mixture in the process (in pounds) to two significant digits? ☐ The five- or six-digit NAICS code that most closely corresponds to the process? ☐ The correct program level of the process?	☐Y	☐N	☐N/A
2. Does the registration form include whether a public meeting has been held following an RMP reportable accident, pursuant to §68.210(b)? [68.160(b)(21)]	☐Y	☐N	☐N/A
3. Does the owner or operator provide in the RMP: [68.180(a)] ☐ Name, phone number and email address of local emergency planning and response organizations with which the stationary source last coordinated emergency response efforts, pursuant to §68.10(g)(3) or §68.93? [68.180(a)(1)] ☐ The date of the most recent coordination with the local emergency response organizations, pursuant to §68.93? [68.180(a)(2)] ☐ A list of Federal or state emergency plan requirements to which the stationary source is subject? [68.180(a)(3)]	☐Y	☐N	☐N/A
4. For non-responding stationary sources, does the owner or operator identify: [68.180(b)(1)] ☐ For stationary sources with any regulated toxic substance held in a process above the threshold quantity, whether the stationary source is included in the community emergency response plan developed under 42 U.S.C. 11003, pursuant to §68.90(b)(1)? [68.180(b)(1)(i)] ☐ For stationary sources with only regulated flammable substances held in a process above the threshold quantity, the date of the most recent coordination with the local fire department, pursuant to §68.90(b)(2)? [68.180(b)(1)(ii)] ☐ What mechanisms are in place to notify the public and emergency responders when there is a need for emergency response? [68.180(b)(1)(iii)] ☐ The date of the most recent notification exercise, as required in §68.96(a)? [68.180(b)(1)(iv)]	☐Y	☐N	☐N/A
5. For responding stationary sources, does the owner or operator identify the date of the most recent: [68.180(b)(2)] ☐ Review and update of the emergency response plan, pursuant to §68.95(a)(4)? [68.180(b)(2)(i)] ☐ Notification exercise, as required in §68.96(a)? [68.180(b)(2)(ii)] ☐ Field exercise, as required in §68.96(b)(1)? [68.180(b)(2)(iii)] ☐ Tabletop exercise, as required in §68.96(b)(2)? [68.180(b)(2)(iv)]	☐Y	☐N	☐N/A

6. Has the owner or operator reviewed and updated the RMP and submitted it to EPA for the following: [68.190(a)]? ☐ Five-year update. [68.190(b)(1)] ☐ Within three years of a newly regulated substance listing. [68.190(b)(2)] ☐ At the time a new regulated substance is first present in an already regulated process above threshold quantities. [68.190(b)(3)] ☐ At the time a regulated substance is first present in an new process above threshold quantities. [68.190(b)(4)] ☐ Within six months of a change requiring revised PHA or hazard review. [68.190(b)(5)] ☐ Within six months of a change requiring a revised OCA as provided in 68.36. [68.190(b)(6)] ☐ Within six months of a change that alters the Program level that applies to any covered process. [68.190(b)(7)]	☐Y	☐N	☐N/A
7. If the owner or operator experienced an accidental release that met the five-year accident history reporting criteria (as described at 68.42) subsequent to April 9, 2004, did the owner or operator submit the information required at 68.168, 68.170(j) and 68.175(l) within six months of the release or by the time the RMP was updated as required at 68.190, whichever was earlier. [68.195(a)]	☐Y	☐N	☐N/A
8. If the emergency contact information required at 68.160(b)(6) has changed since June 21, 2004, did the owner or operator submit corrected information within thirty days of the change? [68.195(b)]	☐Y	☐N	☐N/A

Subpart H – Other Requirements [40 CFR 68.200 – 68.210]

Implemented Other Requirements as provided in 40 CFR 68.200-68.210?
Comments:

1. Has the owner or operator maintained records supporting the implementation of this part at the stationary source for five years, unless otherwise provided in Subpart D: Program 3 Prevention Program? [68.200]	☐Y	■N	☐N/A
2. Did the owner or operator hold a public meeting to provide information required under §68.42(b), no later than 90 days after any RMP reportable accident at the stationary source with any known offsite impact specified in §68.42(a)? [68.210(b)]	☐Y	☐N	■N/A