

U.S. Environmental Protection Agency Region 4
61 Forsyth Street Atlanta, GA 30303
Chemical Management and Emergency Planning Section
EPCRA Inspection Checklist/Inspection Report

Company Name Helm Fertilizer Corporation SIC/NAICS 42459

Lead Inspector Name Jordan Noles Inspection Date August 19, 2021

Inspection Team Members Bethany Terpin

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

Name/Title James Hinton/ Director EHS&Q Phone (901) 942-2859

Name/Title _____ Phone _____

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

Facility Name: Helm Fertilizer Terminal

Address: 1421 Channel Avenue

Memphis County: Shelby

Owner/Operator/Parent Company (Name, Address, Phone): Helm Fertilizer Corporation

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

3. Obtain/review facility description

- a. Officers' names and titles _____

- b. Incorporation date and location _____
- c. Other facilities owned by the company _____

- d. Number of employees 45
- e. Annual Corporate Sales N/A
- f. Process Description and Process Diagrams The facility receives anhydrous ammonia via barges and railcars, and the anhydrous ammonia is stored onsite in numerous storage vessels until it can be loaded into trucks for shipment. In addition, the facility utilizes an aqua ammonia converter to add water to the anhydrous ammonia to create 19.5% and 29.4% aqueous ammonia, which is stored at the facility until it is loaded for shipment at a common loadout location.

Inspection Identifier: _____ EPCRA 08/19/2021

4. Compliance Review by Statute:

Section 302

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

Section 303 (if subject to 302)

- d. Facility Emergency Coordinator James Hinton
- e. Date identified to LEPC?
- f. Emergency Contingency Plan submitted (date)?
- g. Obtained copies of notification letters and verified mail return receipts, where appropriate?

Section 304/CERCLA 103

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

Section 311

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

Section 312

- | | | | |
|--|----------|---|------------|
| n. Obtained chemical inventory list | <u>Y</u> | N | N/A |
| o. View purchase records (where applicable) | Y | N | <u>N/A</u> |
| p. Tier II reports to SERC, LEPC, fire dept (Haz. Chem $\geq$ 10,000 lbs)? | <u>Y</u> | N | N/A |
| q. Tier II reports to SERC, LEPC, fire dept (EHSs $\geq$ 500 lbs or TPQ)? | <u>Y</u> | N | N/A |
| r. Reviewed documentation of maximum daily amounts stored? | <u>Y</u> | N | N/A |
| s. Reviewed MSDSs? | <u>Y</u> | N | N/A |
| t. Reviewed documentation of submissions? | Y | N | N/A |

Section 313

u. Form R/A to State and EPA for Toxic Chemicals:

Manufactured, processed, and caused to be imported $\geq 25,000$ lbs,
otherwise used $\geq 10,000$ lbsY N N/A

v. Obtained list of 313 chemicals MPOU at the facility

Y N N/A

w. Obtained documentation of submissions?

Y N N/A**Report Prepared By:**Name (Printed): Jordan NolesTitle: Lead Inspector, North Air Enforcement SectionSignature: JORDAN NOLES Digitally signed by JORDAN NOLES
Date: 2021.10.15 11:00:11 -04'00'

Date: _____

Report Authorized By:Name (Printed): Jason DresslerTitle: Chief, North Air Enforcement SectionSignature: JASON DRESSLER Digitally signed by JASON
DRESSLER
Date: 2021.10.15 12:23:25 -04'00'

Date: _____