



REGION 5

CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Trammo Terminal – Niota, Inc.

FROM: Manojkumar P Patel, Environmental Engineer
AECAB (MI/WI)

THRU: Sarah Marshall, Section Supervisor
AECAB (MI/WI)

TO: File

BASIC INFORMATION

Facility Name: Trammo Terminal – Niota, Inc.

Facility Location: 1175 East County Road 2920 North, Niota, Illinois 62358

Date of Inspection: September 10 and 11, 2024

EPA Inspector(s):

1. Manojkumar Patel, Environmental Engineer
2. Greg Chomycia, Environmental Engineer

Other Attendees:

1. Ricci Hull, IC Department, Orion Engineering, for Lemm Corporation
2. Alan Gertonson, Process Engineer, Openrange Engineering for Lemm Corporation
3. Tom Rose, Facility Manager, Trammo Terminal Niota, Inc.
4. Jessica Dorn, Office Assistant, Trammo Terminal Niota, Inc.
5. Robert Helenthal, Operator, Trammo Terminal Niota, Inc.

Contact Email Address: TARose@LemmCorp.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

Facility Name: Trammo Terminal - Niota, Inc.
Facility Location: 1175 East County Road 2920 North, Niota, Illinois 62358
Date of Inspection: September 10 and 11, 2024

Facility Type: Anhydrous Ammonia Storage (NAICS: 49319 Other Warehousing and Storage)

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

Arrival Time: 9/10/2024 at 9:00 AM; 9/11/2024 at 7:10 AM

Departure Time: 9/10/2024 at 4:30 PM; 9/11/2024 at 2:10 PM

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 facility personnel unless otherwise noted.

Process Description:

Trammo Terminal Niota, Inc. is located at 1175 East County Road 2920 North in Niota, Illinois. Ammonia is received by refrigerated barge through a pipeline from the river dock to the terminal. The anhydrous ammonia is transferred into the anhydrous ammonia storage tank at a low temperature and low pressure. This facility is designed to ship anhydrous ammonia by trucks, pipeline, or barge. The ammonia store is used primarily for agriculture use, such as fertilizer.

The facility has several process equipment such as receivers, accumulators, flares, sensors, compressors, and pipelines to facilitate plant operations.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

The following observations were made during the record review process:

Risk Management Program Applicability

EPA requested information on the quantity of anhydrous ammonia stores in the storage tank 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 anhydrous ammonia or aqua ammonia (> 20% concentration) listed in Table 1 to 40 C.F.R. § 68.130 is 10,000 pounds. During the inspection, the facility informed EPA that based on the recent RMP submittal, the anhydrous ammonia capacity is more than 10,000 pounds.

The facility describes its operations as under the North Industrial Classification Standards (NAICS) code 49319 (Other Warehousing and Storage). This NAICS code is not listed under the eligible NAICS code under the RMP regulations. However, the covered process meets the Program Level 3 eligibility requirements because the covered processes are subject to the Occupational Health and Safety Agency (OSHA) Process Safety Management standards at 29 C.F.R. § 1910.119 and it satisfies the requirements at 40 C.F.R. § 68.10(i)(2).

Management System for Implementing Elements of Risk Management Program

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

The facility was able to provide an assigned qualified person or position that has the overall responsibility for the development, implementation, and integration of RMP elements. However, no organizational chart or similar documents were provided to EPA showing the individual requirements of RMP.

Process Safety Information

EPA requested the facility to provide process safety information for all covered process equipment. EPA observed that based on the facility's documents, the maximum intended inventory for the anhydrous ammonia quantity is inconsistent and needs to be corrected.

EPA was unable to verify the facility's electrical classification, relief system design and design basis, and design codes and standards employed. The facility will upload this information at a later time.

The facility has valves between the new tank and the two pressure safety valves (PSVs). The tank can be isolated from overpressure protection if both valves are closed at the same time, which could lead to an uncontrolled release. The facility has chosen to ensure these valves do not both get closed at the same time by indicating a permanent operating condition on the P&IDs. Using what is commonly referred to as a "car seal" program. This facility's car seal program has valve tags with a thin wire that wraps around the valve handle and the valve stem in a way that won't allow the valve position to be changed without permanently damaging the tag. After any change in position the valve tags must be

replaced. The facility conducts monthly audits of all the car sealed valves at the facility to review them for proper position and that the valves still have the car seal. The notation on the P&ID for the permanent position is "CSO" for sealed open valves or "CSC" for sealed closed valves.

On the new tank, the indication on the P&ID was that both valves before the PSV valves are "CSC" or car sealed closed. If followed as written, this would close the vessel off from overpressure increasing the potential for an uncontrolled release. EPA examined the actual position of the valves and found that both valves had the indicator tags. One valve was sealed open, and one was sealed closed. EPA also examined the car seal audit worksheet and found that one of the valves was listed as open and other was listed as closed.

EPA also discussed the facility's documentation about whether the equipment complies with recognized and generally accepted good engineering practices (RAGAGEP) and the facility informed EPA that it will upload RAGAGEP information for review.

The facility claimed that the material and energy balance requirements are not applicable to its processes as all covered processes were built prior to June 21, 1999.

Process Hazards Analysis (PHA)

The facility used the Hazards and Operability Study (HAZOP) analysis for the latest PHA revalidation that occurred in or around December 2021. EPA was unable to verify that the facility updated or revalidated the PHA every 5 years to show it is consistent with the RMP regulations.

The 2021 PHA report recommended to "consider conducting periodic emergency response and evacuation drills to help ensure site personnel & local agencies understand the requirements of the Emergency Action Plan". The facility accomplished this recommendation on or around October 25, 2022.

Operating Procedures

The company will upload all operating procedures for EPA's review. The facility stated that all operating procedures are readily accessible by employees who are involved in the anhydrous covered processes. EPA was unable to review documentation from the facility regarding annual certification that the operating procedures are current and accurate.

Training

EPA requested RMP training records for all employees at the facility. Specifically, EPA requested that all records must contain information that each employee understood the training on operating processes and can verify that each employee understood the training. All training records were uploaded to the SharePoint folder, and EPA will review the training records.

Mechanical Integrity

The facility claims that it has established and developed written procedures to maintain the on-going integrity of the process equipment. EPA requested inspection and testing records for the anhydrous ammonia tank, all related transfer pumps, flares, condensers, compressors, accumulators, pressure relief valves (PRVs), sensors, and alarms.

EPA did not verify the inspection and the required testing performed on all process equipment. The facility will provide documents demonstrating that it followed RAGAGEP for inspections and tests on all covered equipment.

EPA was unable to verify that the facility corrected deficiencies in the equipment that were outside acceptable limits defined in the SOPs before further use or assuring a safe operation.

Management of Change

The facility informed EPA that it established and implemented written procedures to manage change to process chemicals, technology, and equipment. EPA reviewed a list of Management of Change (MOC) in the last 5 years and requested that the facility upload all information related to the MOCs to a shared folder provided by EPA.

Compliance Audits

EPA received a copy of the September 2024 Compliance Audit report and is reviewing the findings.

Contractors

EPA requested the facility upload all contractor related policies and procedures. EPA was unable to verify how the facility evaluates information about contractor's safety performance when it selects a contractor. EPA observed that the facility did not provide how it evaluates the performance of contractors.

Emergency Response

The facility informed EPA that the facility is not designated as a "responding source" under RMP emergency response program.

Photos and/or Videos: were not taken during the inspection.

Field Measurements: were not taken during this inspection.

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CLOSING CONFERENCE

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

Requested documents:

EPA received the following documents during the September 10 and 11, 2024, inspection.

Chapter 6 of PSM manual "Contractor's page 1-10" associated checklists	HARDCOPY
PQF Filled out for Capital Coatings CONFIDENTIAL	HARDCOPY
Example of Employee awareness of PSM for David Helenthal	HARDCOPY
SDS for site chemicals	HARDCOPY
COA for barge (loaded August 29, 2024)	HARDCOPY
Site sign in log for 9/11/2024	HARDCOPY
Example of Contractor post award safety audit 3-9-2021	HARDCOPY
Blank Copy of Employee awareness form	HARDCOPY
Training SOP Chapter 5 with forms	HARDCOPY
Employee training records two operators (John Fish and John Poland)	HARDCOPY
Annual Certification of Operating Procedures	HARDCOPY
Chapter 4 Operating procedures standard from PSM book	HARDCOPY
Safe Operating Limits	HARDCOPY
Ventilation study for compressor building	HARDCOPY
All Inspection Reports of PSV	HARDCOPY

DIGITAL SIGNATURES

Report Author: **MANOJKUMAR PATEL** Digitally signed by
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Section Supervisor: **SARAH MARSHALL** Digitally signed by
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