

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

FACILITY INFORMATION:

Name: Hermiston Power, LLC
Physical Address: 78910 Simplot Road, Hermiston, Oregon
Phone Number: (541) 667-3250
Latitude/Longitude: 45.793056/-119.311667
EPA Facility ID# 100000179246

CONTACT INFORMATION (RMP Implementation):

Name: Jeffrey Krupp
Phone Number: (541) 667-3250
E-mail: Jeffrey.Krupp@calpine.com

EMERGENCY CONTACT INFORMATION:

Name: Control Room Operator on Duty
Phone (24-hr): (541) 667-3250
E-mail: AP-Inquiries@calpine.com
Website: www.calpine.com

AUDIT DETAILS:

Contact Date: 7/27/2021
Inspector: Peter Phillips, US EPA Region 10 SEE Grantee, RMP Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: 6/21/2002
Date of Latest Update: 11/4/2019

Process (Program 1, 2, 3) as reported in RMP:

Process ID	Description	Process Chemical ID	NAICS Code	Program Level	Chemical Name CAS Number	Quantity (lbs)
1000104295	NOx Emissions Control (Power Generation)	1000130629	221112	3	Ammonia, Anhydrous (7664-41-7)	146,780

PURPOSE:

The purpose of this document review was to determine whether this facility is in compliance with Section 112(r) of the Clean Air Act and Title 40 Code of Federal Regulations (CFR) Part 68, Chemical Accident Prevention Provisions and compliance with Section 312 of the Emergency Planning and Community Right to Know Act (EPCRA) which requires the Tier II Chemical Inventory Reports to be submitted annually. EPA Region 10 RMP inspectors will not be conducting onsite inspections due to the COVID-19 pandemic requiring restricted travel and social distancing by the Centers for Disease Control (CDC) to prevent the spread of COVID-19. EPA Region 10 will coordinate with the RMP facility to schedule an onsite inspection when the CDC has determined it is safe.

- The facility has been previously inspected in the past 5 years: No ☒ Yes ☐
- Is the emergency contact information current? No ☐ Yes ☒
- The facility is High Risk: No ☒ Yes ☐

- Joint EPCRA inspection: No ☐ Yes ☒

CAA Title V Air Permit:

Does the facility have a CAA Title V Permit? No ☐ Yes ☒

If Yes, Permit Number: OR T-V 30-0118

RELEASE/ACCIDENT HISTORY:

Did the facility have a reportable release in the past 5 years? No ☒ Yes ☐

EPCRA TIER II REPORTING HISTORY:

Did the facility submit their 2020 Tier II report to the SERC? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 2/10/2021

Did the facility submit a Tier II to the LEPC and local fire department? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 2/10/2021

GENERAL INFORMATION:

The Hermiston Power, LLC facility is regulated under the Risk Management Program as a Program Level 3 process and is owned by Calpine Corporation. Hermiston Power, LLC operates the power generation facility. The facility produces electric power from the combustion of natural gas. The regulated substance at this facility is anhydrous ammonia. Anhydrous ammonia is used to reduce the formation of oxides of nitrogen (NOx) produced during combustion. Anhydrous ammonia is received by tanker truck and stored in two storage pressure vessels. Anhydrous ammonia flows in piping from the storage vessels and injected into the combustion system reacting with the natural gas combustion products to minimize NOx emissions. Authorized facility employees, management personnel and contractors are only allowed access to the site. There are 22 full-time employees on site.

The maximum reported intended inventory of anhydrous ammonia is 146,800 pounds (73,400 pounds in each of two storage vessel) that exceeds the threshold quantity of 10,000 pounds.

The chemical specific prevention steps include the following engineering and administrative controls:

- **Ammonia Storage Vessel:** pressure indicators, level indicators, safety valves, temperature gauges.
- **Ammonia Leak Detectors:** An alarm sounds when a concentration of 5 ppm of ammonia is detected. A secondary alarm sounds when a concentration of 25 ppm of ammonia is detected.
- **Emergency Deluge System:** The deluge system is manually activated from the mash button in the Control Room to help mitigate an ammonia vapor cloud.
- **Secondary Containment:** A single secondary containment area is sufficient to contain the full contents of both storage vessels, 24 hours of rainfall as determined by the 25-year storm and deluge water for 20 minutes as determined by code.

INFORMATION REQUESTED FROM FACILITY:

1. Process Hazard Analysis – last two updates/revalidations.
2. Compliance Audit – last two compliance audit reports.
3. Training – operator/maintenance initial and refresher training records.

ANALYSIS OF DOCUMENTATION SUBMITTED:

1. **Process Hazard Analysis (PHA):** Hermiston Power, LLC provided their 2015 and 2019 PHA revalidations. The 2015 PHA revalidation was conducted on March 5, 2015. All findings and recommendations were completed, and no items were carried over to the 2019 PHA revalidation. The 2019 PHA revalidation was finalized on December 23, 2019 as reported in their RMP. The 2019 PHA shows that all findings and recommendations were completed with completion dates no later than January 27, 2021. The 2019 PHA revalidation was completed five years after their 2015 PHA.
2. **Compliance Audit:** Hermiston Power, LLC provided their 2016 and 2019 Compliance Audit reports including finding tracking sheets. All 2016 Compliance Audit findings were addressed by June 16, 2016. All 2019 Compliance Audit findings were addressed by November 1, 2019. Hermiston Power, LLC is performing their compliance audits every three years.
3. **Training:** Hermiston Power, LLC provided a completed Training Summary and has eight operators that are trained to operate the anhydrous ammonia NOx mitigation process. The facility has an additional employee that is undergoing operator training and one operator vacancy. Hermiston Power, LLC provided example training documentation for three operators, Erik Berglund, Jason Schacher and Mitch Monroe for review. The training included the facility's Standard Operating Procedures (SOP) and safe work practices. The three operator's training documentation shows that they acknowledged receiving and understanding their training by initialing subject training documentation.

AREAS OF CONCERNS:

No areas of concern were identified during the document review.

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

DOCUMENTS REQUESTED ON FOLLOW-UP:

The following documents were requested after the initial submission of documents. These documents were reviewed to determine compliance with Section 112(r) of the Clean Air Act.

1. Operator training documentation for their three most recent operators. This information was submitted via email on 9/16/2021.

AUDIT REPORT CERTIFICATION:

This is to certify that I, Peter Phillips, was the lead inspector at this facility and that I have verified the accuracy of the observations in this inspection report:

Signature

Date

RMP Coordinator/Approval

Date

EPCRA Coordinator/Approval	Date
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Land Enforcement Section Chief/Approval	Date
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