



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

ENFORCEMENT &
COMPLIANCE ASSURANCE
DIVISION

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

FACILITY INFORMATION:

Name: Eugene Welders Supply dba Industrial Source
Physical Address: 3500 Commercial Avenue, Springfield, OR 97478
Phone Number: 541-242-6101
Latitude/Longitude: 44.0535491/-122.975755
RMP Facility ID#: 1000000248109
FRS ID#: 10004820374
EJ Concerns: Yes (80% and Above)

CONTACT INFORMATION (RMP Implementation):

Name: Pamela Jones
Phone Number: 541-228-6549
E-mail: pamj@industrialsource.com

EMERGENCY CONTACT INFORMATION:

Name: David Ficker
Phone (24-hr): 541-228-6549
E-mail: davidf@industrialsource.com

TRIP DETAILS:

Inspection Date: February 7, 2024
Inspection Time: 0900 hours through 1235 hours
EPA Inspection Team:
Terry Garcia, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Peter Phillips, US EPA Region 10 SEE Grantee, RMP Inspector
Edward Johannes, US EPA Region 10 SEE Grantee, RMP Inspector
Robert Faries, Weston Solutions, Inc., EPA START Contractor
Ken Valder, Weston Solutions, Inc., EPA START Contractor

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: February 8, 2022

Date of Latest Update: February 8, 2022

Process Program Level 3 as reported in RMP:

Process ID	Description	Process Chemical ID	NAICS Code	Program Level	Chemical Name CAS Number	Quantity (lbs)
1000122596	hydrocarbon filling	1000153491	42469	3	Butane (106-97-8)	79,383
1000122596	hydrocarbon filling	1000153492	42469	3	Isobutane (75-28-5)	59,660
1000122596	hydrocarbon filling	1000153493	42469	3	Propane (74-98-6)	51,253

PURPOSE:

The purpose of this inspection was to determine if this facility is in compliance with Section 112(r) of the Clean Air Act and Title 40 Code of Federal Regulations (CFR) Part 68, Chemical Accident Prevention Provisions.

- The facility has been previously inspected in the past 5 years: No ☐ Yes ☒
If Yes, Date of Last Inspection:
- The facility is High Risk: No ☒ Yes ☐
- Joint EPCRA inspection: No ☐ Yes ☒

CAA Title V Air Permit:Does the facility have a CAA Title V Permit? No ☒ Yes ☐*If Yes, Permit Number:***RELEASE/ACCIDENT HISTORY:**Did the facility have a reportable release in the past 5 years? No ☒ Yes ☐*If Yes, Date and Description of the Release:***EPCRA TIER II REPORTING:**Did the facility submit the [Enter Year] Tier II report to the SERC? No ☐ Yes ☒*If Yes, Date the Tier II was submitted:* 3/1/2024*If No, calendar year of the most recent Tier II:*Did the facility submit a Tier II to the LEPC and local fire department? No ☐ Yes ☒*If Yes, Date the Tier II was submitted:* 3/1/2024

INSPECTION ENTRY:

Terry Garcia led the inspection entry. The EPA Inspection Team (EPA) met with facility representatives Ronnie Johnson, Pamela Jones, David Ficker, Robert Laing, and Victoria Lewis at the Eugene Welders Supply (Industrial Source) Facility in Springfield, Oregon. EPA arrived at the facility at 0900 hours and was joined by the following facility personnel:

Name	Title, Organization
Ronnie Johnson	Compliance Coordinator
Pamela Jones	Gas Operations Manager
David Ficker	General Manager
Robert Laing	Co-President
Victoria Lewis	Marketing Assistant

Was a state/county/or local emergency representative present? No ☒ Yes ☐

If Yes, Name and Title of Representative:

The facility is a first responder: No ☒ Yes ☐

If No, Responding Agency:

Facility representatives escorted EPA to a conference room located in the facility's office building. Lead Inspector Terry Garcia, introduced all parties present, provided a summary of the Risk Management Program (RMP), and explained the purpose of the visit. Each EPA Inspector presented his/her credentials.

EPA then requested an explanation of the facility's operations and any additional safety measures that should be taken during the site tour. David Ficker gave a brief description of the facility, operations, and personal protective equipment required for the tour.

Prior to the inspection, EPA sent a certified notice of inspection letter to the facility informing them of the CAA Section 112(r)(6)(L) requirement that facility employees and employee representatives (such as a union representative) have the right to participate in the RMP inspection, and that a copy of the letter must be provided to the employee representative(s) and the letter posted in a manner accessible to employees in the facility.

The facility is unionized: No ☒ Yes ☐

If Yes, Name of Union:

An employee representative present during the facility visit: No ☒ Yes ☐

If Yes, Name/Title:

GENERAL INFORMATION:

The facility is regulated as a RMP Program Level 3 facility and is owned and operated by Eugene Welders Supply dba Industrial Source. The facility provides gas filling services, offering both trans-fill and blend filling. Regulated chemicals are stored and utilized in the facility's hydrocarbon fill area on the south side of the property. The facility maintains three 12,000-gallon bulk tanks that contain pure instrument-grade hydrocarbons that are non-odorized (butane, propane, and isobutylene). There are two smaller 1,000-pound tanks. The first tank contains industrial grade propane which is utilized by the facility's forklifts. The second tank is the facility's dump tank. When customers return cylinders, their contents are emptied into the dump tank and fed into the facility's flare. There are 44 full-time employees on-site, three of whom are operators (two main, one backup). The facility operates Monday through Friday from 0800 to 1700 hours. Bulk tanks were installed by Gas Innovations.

ON-SITE OBSERVATIONS:

EPA toured the facility from approximately 0920 to 1200 hours. EPA observed the hydrocarbon filling area located on the northwest side of the property (Photo 1). The hydrocarbon filling area utilizes emergency shutoff switches that shut down electric and mechanical functions in the filling area (Photo 2).

The Propane, Butane, and Isobutane tanks are all filled via bulkheads on the north side of the filling area (Photos 3-5). Trucks connect a liquid and vapor line while filling each tank. Each tank has a certification plaque (Photos 6-8). A cinderblock wall (Photo 9) separates the hydrocarbon filling area from the neighboring property. The local fire department required the facility to construct the wall before issuing a permit.

Facility representatives led EPA to the south side of the filling area. Three fill stations are utilized (Photo 10) to fill customers' cylinders to 80% capacity using a pump. Each station has a certified electronic scale and gas line running to either propane, butane, or isobutane. The fill lines were unlabeled at the time of the inspection (Photos 11 & 12). Each line runs to a 12,000-gallon tank. Each 12,000-gallon tank has a volume gauge (Photos 13-15). Customers' returned cylinders are visually inspected and any remaining contents are emptied into the facility's dump tank. Residual vapors are then vacuumed out of the cylinder and into the dump tank at the vacuum station (Photos 16 & 17). Vapor gas from the dump tank is burned off with the facility's flare stack (Photo 18).

Photographs taken during the inspection are included in Attachment A to this report.

EPA observed the 6,000-gallon oxygen and carbon dioxide tanks, not RMP regulated (Photos 19 & 20) before ending the walkthrough and returning to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to Ronnie Johnson, Pamela Jones, David Ficker, Robert Laing, and Victoria Lewis.

INFORMATION COLLECTED FROM FACILITY:

1. Sign-in Sheet
2. June 2021 Process Hazard Analysis
3. SOP Training Certification
4. Facility Plot Plan
5. Process Flow Diagrams
6. 2022 Emergency and Hazardous Chemical Inventory

AREAS OF CONCERN ADDRESSED IN THE CLOSING CONFERENCE:

1. **General Applicability [68.10]:** The facility has not coordinated with emergency responders. [68.10(b)]
2. **General Applicability [68.10]:** The facility has not developed plans for conducting emergency response exercises in accordance with 68.96 by December 21, 2023. [68.10(d)]
3. **General Management [68.15]:** During the inspection, the facility provided a document entitled General Management Policy identifying the persons responsible for developing and implementing the overall RMP elements but does not clearly identify roles for implementing individual RMP requirements. [66.15(c)]
4. **Process Safety Information [68.65]:** The facility process safety information did not contain information pertaining to the design code standards employed such as the National Fire Protection Association (NFPA) and American Society of Mechanical Engineers (ASME) codes and standards. [68.65(d)(1)(vi)]
5. **Process Safety Information [68.65]:** The facility was unable to provide proper documentation that shows process equipment complies with recognized and generally accepted good engineering practices (RAGAGEP). [68.65(d)(2)]
6. **Process Hazard Analysis [68.67]:** The facility was unable provide a PHA recommendations and findings tracking document for their 2021 PHA with the responsible person, proposed completion dates, completion dates, resolution and actions taken. [68.67(e)]
7. **Mechanical Integrity [68.73]:** The facility was unable to provide written maintenance procedures on their process equipment such as piping, valves, pressure vessels, pumps, and emergency shutdown system. [68.73(b)]
8. **Mechanical Integrity [68.73]:** The facility was unable to provide training documentation for each employee involved in maintaining the ongoing integrity of process equipment. The facility did not maintain documentation for two Maintenance Operators, David Ficker and Jordan Adams [68.73(c)]
9. **Mechanical Integrity [68.73]:** The facility was unable to provide inspection and testing documentation for inspection and tests performed on process equipment identifying date of the inspection, name of person who performed the inspection or test, equipment identifier, inspection or test performed, and results. [68.73(d)(1) and (d)(4)]
10. **Mechanical Integrity [68.73]:** The facility was unable to provide documentation showing they followed recognized and generally accepted good engineering practices (RAGAGEP) for inspection and testing procedures. [68.73(d)(2)]
11. **Mechanical Integrity [68.73]:** The facility was unable to provide documentation showing they 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)]
12. **Mechanical Integrity [68.73]:** The facility was unable to provide documentation on their quality assurance program to ensure maintenance materials, spare parts and equipment were suitable for the process application for which they would be used and appropriate checks and inspections are done to assure that equipment was installed properly. [68.73(f)]
13. **Employee Participation [68.83]:** The facility was unable to provide a written plan of action regarding the implementation of the employee participation required. [68.83(a)]
14. **Contractors [68.87]:** The facility was unable to provide documentation on the safety performance evaluation on the contract owner or operator. The facility provided contractor information for two contractors: Gas Innovations (drivers) and Revolution (electric); however the documents provided do not meet the requirements. [68.87(b)(1)]

15. **Contractors [68.87]:** The facility was unable to provide documentation that they 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)]
16. **Contractors [68.87]:** The facility was unable to provide documentation that they periodically evaluate the performance of the contract owner or operator in fulfilling their obligations. [68.87(b)(5)]
17. **Emergency Response [68.90]:** The facility was unable to provide documentation that they coordinated response action with the local fire department. [68.90(b)(2)]
18. **Emergency Response [68.90]:** The facility was unable to provide documentation that they performed annual emergency response coordination activities. [68.90(b)(4)]
19. **Emergency Response [68.93]:** The facility was unable to provide documentation showing they had coordinated at least annually to address changes to their emergency action plan and/or in the community emergency response plan. [68.93(a) and (c)]
20. **Emergency Response [68.93]:** The facility was unable to provide documentation that they provided their emergency action plan to the local emergency planning and response organizations. [68.93(b) and (c)]

DOCUMENTS REQUESTED NOT INCLUDED IN THE REPORT:

The following documents were requested during the inspection but are not included in this report. These documents will still be reviewed to determine compliance with Section 112(r) of the Clean Air Act.

1. Driver bulk fill standard operating procedure and training records. Provided post inspection.
2. Pre-startup review as required by 68.77 for regulated process innovation.
3. RMP Management Policy/Orientation Chart. (Facility created and provided General Management Organizational Chart at time of inspection.)
4. Gas Innovations' training policy regarding the regulated processes.
5. Confined space and LOTO policy.
6. Pre-startup safety review policy.

INSPECTION REPORT CERTIFICATION:

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

Terry Garcia Digitally signed by Terry Garcia
Date: 2024.04.16 14:52:03 -07'00'

Inspector Signature

JAVIER MORALES Digitally signed by JAVIER
MORALES
Date: 2024.04.16 15:10:15 -07'00'

RMP Coordinator/Approval

ERIN WILLIAMS Digitally signed by ERIN
WILLIAMS
Date: 2024.04.17 11:14:04 -07'00'

EPCRA Coordinator/Approval

**MATTHEW
QUARTERMAN** Digitally signed by MATTHEW
QUARTERMAN
Date: 2024.04.17 13:24:45 -07'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: RMP Inspection – Eugene Welders Supply dba Industrial Source

City, State: Springfield, OR

Photographer: Robert Faries, Weston Solutions

File	Photo Layout ID	Date	Time	Description
Photo1.jpg	1	2/7/2024	0920-1200 hours	Overview including three 12,000-gallon bulk product tanks, one 1,000 lb dump tank, one 1,000 lb industrial propane tank, safety bollards, a wall separating the hydrocarbon filling area from the neighboring property, emergency shutoff, and empty tanks. Location in Facility: Hydrocarbon filling area.
Photo2.jpg	2	2/7/2024	0920-1200 hours	Emergency shutoff switch on the Northwest side of the property. Location in Facility: Hydrocarbon filling area.
Photo3.jpg	3	2/7/2024	0920-1200 hours	Butane filling bulkheads. Liquid and vapor lines. Location in Facility: Hydrocarbon filling area.
Photo4.jpg	4	2/7/2024	0920-1200 hours	Propane filling bulkheads. Liquid and vapor lines. Location in Facility: Hydrocarbon filling area.
Photo5.jpg	5	2/7/2024	0920-1200 hours	Isobutane filling bulkheads. Liquid and vapor lines. Location in Facility: Hydrocarbon filling area.
Photo6.jpg	6	2/7/2024	0920-1200 hours	Propane tank certification. Location in Facility: Hydrocarbon filling area.
Photo7.jpg	7	2/7/2024	0920-1200 hours	Isobutane tank certification. Location in Facility: Hydrocarbon filling area.
Photo8.jpg	8	2/7/2024	0920-1200 hours	Butane tank certification. Location in Facility: Hydrocarbon filling area.
Photo9.jpg	9	2/7/2024	0920-1200 hours	Eugene-Springfield Fire Department required the facility to build a wall due to the hydrocarbon filling area's proximity to the neighboring property. Location in Facility: Hydrocarbon filling area.
Photo10.jpg	10	2/7/2024	0920-1200 hours	Propane, butane, and isobutane filling stations. Pig tail connects empty customer tanks to the lines to be filled. Location in Facility: Hydrocarbon filling area.
Photo11.jpg	11	2/7/2024	0920-1200 hours	Unlabeled propane, butane, and isobutane filling pipes. Location in Facility: Hydrocarbon filling area.
Photo12.jpg	12	2/7/2024	0920-1200 hours	Unlabeled propane, butane, and isobutane filling pipes. Location in Facility: Hydrocarbon filling area.
Photo13.jpg	13	2/7/2024	0920-1200 hours	Isobutane tank volume gauge. Location in Facility: Hydrocarbon filling area.
Photo14.jpg	14	2/7/2024	0920-1200 hours	Butane tank volume gauge. Location in Facility: Hydrocarbon filling area.
Photo15.jpg	15	2/7/2024	0920-1200 hours	Propane tank volume gauge. Location in Facility: Hydrocarbon filling area.
Photo16.jpg	16	2/7/2024	0920-1200 hours	Vacuum station. Customers' returned gas cylinders are emptied into the dump tank and residual vapors are vacuumed out. Location in Facility: Hydrocarbon filling area.
Photo17.jpg	17	2/7/2024	0920-1200 hours	Facility's industrial propane tank and dump tank. Customers' cylinders are emptied into the dump tank. The contents of the dump tank are run to the flare. Location in Facility: Hydrocarbon filling area.
Photo18.jpg	18	2/7/2024	0920-1200 hours	Flare stack on the roof. Location in Facility: Hydrocarbon filling area.
Photo19.jpg	19	2/7/2024	0920-1200 hours	6,000-gallon CO2 Tank. [not RMP] Location in Facility: Hydrocarbon filling area.
Photo20.jpg	20	2/7/2024	0920-1200 hours	6,000-gallon oxygen tank. [not RMP] Location in Facility: Hydrocarbon filling area.