

United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report

Nutrien Ag Solutions 783

Henderson, Kentucky

August 9, 2023

1.0 Introduction

The U.S. Environmental Protection Agency's efforts to reduce the likelihood and severity of chemical accidents includes planning and legislative initiatives such as the National Contingency Plan, the Emergency Planning and Community Right-to-Know Act (EPCRA), and the Accidental Release Prevention requirements under Section 112(r) of the Clean Air Act (CAA), as amended in 1990. This report outlines an inspection of the Risk Management Program (RMP) as mandated by Section 112(r)(7) of the CAA.

The focus of this inspection was to assess the RMP for the fertilizer distribution process at the Nutrien Ag Solutions 783 facility located in Henderson, Henderson County, Kentucky. This facility was selected for inspection because it hadn't been inspected under the RMP within the last five years. The inspection, which was conducted on August 9, 2023, consisted of an examination of program documentation, as well as site reviews of various aspects of facility operations. Personnel from the facility participated throughout the inspection. Requested program documents were provided for further review off-site. This report will provide a background of the facility and a listing of observations.

2.0 Background

The Nutrien Ag Solutions 783 facility is located in Henderson, Kentucky. The facility stores and distributes anhydrous ammonia to end users for use as a fertilizer. The process is regulated as program level 2. The facility utilizes one 30,000-gallon vessel, eleven 1,450-gallon vessels, and forty 1,000-gallon vessels for anhydrous ammonia storage and distribution. During peak season (~April – May), the facility receives 1 – 3 truckloads of anhydrous ammonia per day. According to facility records, the facility has a maximum of 420,000 pounds of anhydrous ammonia on site. The fertilizer distribution process at the facility is subject to the RMP requirements of 40 C.F.R. Part 68 and EPCRA Section 302. The background specifics are summarized as follows in Table 1.

TABLE 1: Inspection Information Summary

Inspection Team

Lead Inspector: Jordan Noles

Inspector: Chet Gala

Inspector-in-Training: Justin Stark

Date of Facility Visit: August 9, 2023

Facility Identification

Name: Henderson, KY 783

Street Address: 1229 Outer 5th Street

City: Henderson County: Henderson State: Kentucky Zip: 42420

EPA Facility ID No: 100000085908

Dun & Bradstreet (D&B) No: 102412244

Latitude: 37.837057

Longitude: -087.569930

Name, address and phone of corporate parent company:

Owner/Operator: Nutrien Ag Solutions

Mailing Address: 3005 Rocky Mountain Avenue

City: Loveland State: Colorado Zip: 80538

Name, title, and email of person responsible for 40 C.F.R. Part 68 implementation:

Name: Karl Dawson

Title: Manager

Phone: (270) 827-5601

Email: karl.dawson@nutrien.com

Name and title of emergency contact:

Name: Karl Dawson

Title: Manager

Day phone: (270) 827-5601

24-hour Phone: (270) 831-4260

Email: karl.dawson@nutrien.com

Name and titles of stationary source personnel involved in site inspection (*accompanied site tours, provided documents and explanations*):

Name: Karl Dawson

Title: Manager

Phone: (270) 827-5601

Email: karl.dawson@nutrien.com

Name: Sarah Baumgardner

Title: Safety, Health, Environmental Advisor

Phone: (270) 401-6398

Email: Sarah.Baumgardner@nutrien.com

Note: This is not a union facility.

Date and Program Levels of Submitted Risk Management Plan

Date of initial submission: June 21, 1999

Date of most recent submissions: January 26, 2022

Process: Storage & Transfer

Process ID: 1000122849

Program Level as reported in RMP:2

NAICS code: 42491 (Farm Supplies Merchant Wholesalers)

3.0 Observations

The inspection of the Nutrien Ag Solutions 783 facility evaluated various sections of the RMP regulations (40 C.F.R. Part 68, Program Level 2) and the inspection checklist included in “Guidance for Conducting Risk Management Programs Inspections under Clean Air Act Section 112(r).” The inspection began with an opening discussion of facility operations. The discussion was followed by a tour of the facility’s fertilizer distribution process area. EPA inspectors then requested paperwork associated with the facility’s Risk Management Plan (RMPlan). The documents were reviewed by EPA inspectors on-site and provided for review off-site. An inspection out-brief was conducted where EPA inspectors described their observations. Observations from the RMP inspection at the Nutrien Ag Solutions 783 facility are discussed below:

1. 40 C.F.R. § 68.48(b) requires the owner or operator to ensure that the process is designed in compliance with recognized and generally accepted good engineering practices.
 - During the facility tour, the inspection team noted the supports for the ammonia piping had paint peeling off and were showing signs of corrosion. The American National Standard Institute/Compressed Gas Association (ANSI/CGA) G-2.1 – 2014 – Requirements for The Storage and Handling of Anhydrous Ammonia section 5.6.3 states, *“All piping shall be supported in accordance with good piping practices, and provisions shall be made as necessary for expansion, contraction, impact, vibration, and settling.”*
 - During the facility tour, the inspection team noted the ammonia pipes are not labeled with contents or direction of flow. They are painted red and yellow to distinguish between liquid and vapor, respectively. However, the key for the color coding is located in a utility building next to the ammonia vessel and cannot be seen outside, where the pipes are sited. The ammonia piping should be labeled/colored in accordance with the Pipe Marking Guide, American National Standard Institute/American Society of Mechanical Engineers (ANSI/ASME) A31.1 – 2007 Standard for the Identification of Pipes.
 - During the facility tour, the inspection team noted the 30,000-gallon ammonia tank has bollards around it to protect from damage; however, the bollards are very close to the tank. The end of the tank protrudes out past the bollards on the side closest to the entrance to the property. The bollards being installed so close to the

tank could allow it to be damaged by passing vehicles. ANSI/CGA G-2.1 – 2014 section 6.7.1 states, “*Containers and appurtenances shall be located or protected by suitable barriers to avoid damage by trucks or other vehicles.*”

Inspection Report,

Prepared by:

**JORDAN
NOLES**

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JORDAN NOLES
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Jordan Noles, Inspector
North Air Enforcement Section
U.S. EPA Region 4

Approved by:

**JASON
DRESSLER**

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Jason Dressler, Section Chief
North Air Enforcement Section
U.S. EPA Region 4