



REGION 5
CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
The Andersons Logansport Terminal, Logansport, Indiana

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

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

TO: File

BASIC INFORMATION

Facility Name: The Andersons Logansport Terminal

Facility Location: 2345 South County Road 400 East, Logansport, Indiana 46947

Date of Inspection: September 29, 2023

EPA Inspector(s):

1. Manojkumar P. Patel, Environmental Engineer

Other Attendees:

1. Matt Vianco, Operations Manager, The Andersons Logansport Terminal, Logansport, Indiana
2. John Studioso, Plant Engineer, The Andersons Logansport Terminal, Logansport, Indiana

Contact Email Address: matt_vianco@andersonsinc.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(r)

Facility Type: Farm Supplies Merchant Wholesalers with Aqua Ammonia Distributions

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) (Program Level 2)

Arrival Time: September 29, 2023 – 11:15 AM EST

Departure Time: September 29, 2023 – 12:45 PM EST

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:

The facility receives the aqua ammonia and engages in the handling, storage, and distributions of wholesale supplies to local area farmers.

The facility has one 30,000 gallon tank that is used for the bulk storage of aqua ammonia. The tank is located in the fertilizer manufacturing area which is far from the main office building. The aqua ammonia tank has two pressure relief valves located on top of the tank.

The aqua ammonia is transferred from the 30,000 gallon bulk tank to the fertilizer mixing system through steel pipes and are automated from the control room. The facility personnel and truck drivers supervise the loading and unloading activities.

Staff Interview:

The Andersons Logansport Terminal provided the following information during the inspection:

- (1) The Emergency Response Plan (ERP) was updated on December 6, 2022.
- (2) Since the facility does not meet the eligibility requirements for Program level 3 and Program level 1, this facility considered a Program Level 2 under the RMP requirements.
- (3) The facility's processes are not subject to the Occupational Safety and Health Administration (OSHA) process safety management standards under 29 C.F.R. § 1910.119.

- (4) The facility's practice is to replace all Pressure Relief Valve (PRVs) at the same time at the required scheduled interval.
- (5) The facility has had no accidental ammonia releases.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

The following observations were made during the record review process:

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 not able to provide an assigned qualified person or position that has the overall responsibility for the development, implementation, and integration of RMP elements. Also, no organizational chart or similar documents were provided to EPA showing the individual requirements of RMP.

Offsite Consequence Analysis (Worst case release scenarios and Alternative release scenarios)

The facility personnel were unable to provide the input data that were plugged into the RMP*Comp model and informed EPA that the facility will resubmit all input values with its basis for the worst case and alternative release scenarios.

Safety Information

The facility personnel were unable to provide the safe upper and lower limits for temperatures, pressures, and flows for the processes associated with the aqua tanks. The company will upload the information into EPA's SharePoint folder. The facility was not able to provide the information related to codes and standards used to design, build, and operate the process equipment. The facility stated that it uses a fix capacity pump so its flow rate is fixed at 150 gallons per minute.

The facility claimed that its processes are in compliance with the recognized and generally accepted good engineering practices (RAGAGEP) which EPA was unable to verify at the time of the inspection..

Hazard Review

The facility did not provide prior process hazard analysis (PHAs) or initial PHAs to EPA during the inspection. The facility personnel informed EPA that the latest PHA that was completed in or around December 2022 will be uploaded.

The facility believes that this location is properly engineered, designed, and built according to the industry standard but there is no formal review or assessment.

Operating Procedures

The facility uploaded the operating procedure for filling the aqua ammonia tank. The consequence of deviations and steps required to correct or avoid deviations are not described for normal operations, initial startup, normal shutdown, emergency shutdown, and startup.

Training

The facility provided training records for employees and contractors.

Maintenance

The facility did not provide EPA a prepared and implemented maintenance procedure for maintaining on-going mechanical integrity of the process equipment. The facility stated that Paul Akers is the maintenance contractor and it does various types of maintenance on the equipment. In the 2022 RMP Audit checklist, the facility reported that the site has not performed all necessary piping integrity checks. The current equipment will not be in service for more than 2-3 months. EPA requested that all types of training completed by the contractors' employees for maintaining equipment be provided to EPA.

Emergency Response

EPA requested emergency response documentation for the facility. The facility later uploaded Emergency Action and Spill Control Plan (ERP) that covers fires, severe weather, and ammonia leaks.

Photos and/or Videos: were taken during the inspection.

See Appendix A for Digital Image Log.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

(1) Bill of Lading dated September 28, 2023

CLOSING CONFERENCE

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

Requested documents:

- Quantity of Ammonia Purchased on September 28, 2023;
- Emergency Action Plan Logansport 2023;
- RMP Comp Model for Toxic Worst case release and Alternative release scenarios;
- Aqua Ammonia SDS;
- 2019 Logansport Process Hazards Analysis (PHA);
- 2019 Logansport RMP Summary;
- 2019 Logansport RMP Report;
- Logansport Alt. CAPS Population;
- Logansport Alt. MARPLOT;
- Logansport Alt. RMP*Comp;
- Logansport Aqua Ammonia P & ID;
- Logansport PHA revalidation Report Draft A;
- Logansport WC CAPS Population;
- Logansport WC MARPLOT;
- Logansport WC RMP*Comp;
- PSM RMP 2022;
- RMP SOP Review Attendance Sheet 12.8.2022;
- WI 2043 Logansport Aqua Safety System;
- Logansport Production Process Operating;
- WI 0238 Logansport Receiving Aqua Ammonia; and
- WI LOGPIN 2042 Process Description

DIGITAL SIGNATURES

Patel,
Report Author: Manojkumar

Digitally signed by Patel,
Manojkumar
Date: 2023.11.28
12:18:18 -06'00'

SARAH
Section Supervisor: MARSHALL

Digitally signed by
SARAH MARSHALL
Date: 2023.11.28
13:35:49 -06'00'

Facility Name: The Andersons Logansport Terminal
Facility Location: 2345 South County Road 400 East, Logansport, Indiana 46947
Date of Inspection: September 29, 2023

APPENDICES AND ATTACHMENTS

1. Appendix A – Digital Image Log

Facility Name: The Andersons Logansport Terminal
Facility Location: 2345 South County Road 400 East, Logansport, Indiana 46947
Date of Inspection: September 29, 2023

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Manojkumar P. Patel	2. Archival Record Location: Inspection Pictures
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Latitude and Longitude	Description of Image
1	P9290123.JPG	2023:09:29 10:28:01		Truck Unloading (Aqua Ammonia)
2	P9290124.JPG	2023:09:29 10:29:01		Aqua Ammonia Tank Front View - Mfg. Display
3	P9290125.JPG	2023:09:29 10:30:14		Aqua Ammonia Bottom - Flow Valves
4	P9290126.JPG	2023:09:29 10:30:46		Aqua Ammonia Transfer Pump (conc. 29.50%)
5	P9290127.JPG	2023:09:29 10:31:08		Aqua Ammonia 30,000 Gallon Tank - Warning Display
6	P9290128.JPG	2023:09:29 10:32:25		Aqua Ammonia Tank Side View
7	P9290129.JPG	2023:09:29 10:34:18		Aqua Ammonia Tank 2B7 View