

UNITED STATES
ENVIRONMENTAL PROTECTION
AGENCY-REGION 7

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 RENNER BOULEVARD
LENEXA, KANSAS 66219

BEFORE THE ADMINISTRATOR

IN THE MATTER OF)
)
DIXON ELEVATOR CO.) Docket No. CAA-07-2015-0017
)
)
) COMPLAINT AND
) CONSENT AGREEMENT/
) FINAL ORDER
)
Respondent,)
)
)
Proceeding under Section 113(d) of the)
Clean Air Act, 42 U.S.C. § 7413(d))

PRELIMINARY STATEMENT

The United States Environmental Protection Agency, Region 7 (“EPA”) and Dixon Elevator Co. (“Respondent”) have agreed to a settlement of this action before filing of a complaint, and thus this action is simultaneously commenced and concluded pursuant to Rules 22.13(b) and 22.18(b)(2) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders, and the Revocation, Termination or Suspension of Permits (“Consolidated Rules”), 40 C.F.R. §§ 22.13(b) and 22.18(b)(2).

COMPLAINT

Jurisdiction

1. This is an administrative action for the assessment of civil penalties instituted pursuant to Section 113(d) of the Clean Air Act (“CAA”), 42 U.S.C. § 7413(d). Pursuant to Section 113(d) of the CAA, 42 U.S.C. § 7413(d), the Administrator and the Attorney General jointly determined that this matter, where the violations involve the failure to submit a Risk Management Plan as required by 40 C.F.R. § 68.150(a), was appropriate for administrative penalty action.

2. This Complaint and Consent Agreement and Final Order (“CA/FO”) serves as notice that EPA has reason to believe that Respondent has violated the Chemical Accident

Prevention Provisions in 40 C.F.R. Part 68, promulgated pursuant to Section 112(r) of the CAA, 42 U.S.C. § 7412(r), and that Respondent is therefore in violation of Section 112(r) of the CAA, 42 U.S.C. § 7412(r). Furthermore, this CA/FO serves as notice of EPA's intent to issue an order assessing penalties for these violations.

Parties

3. The Complainant, by delegation from the Administrator of EPA and from the Regional Administrator of EPA, Region 7, is the Director of the Air and Waste Management Division, EPA, Region 7.

4. The Respondent is Dixon Elevator Co., a company registered and authorized to do business in the state of Nebraska. The company's retail fertilizer business is located at 205 1st Street, in Dixon, Nebraska.

Statutory and Regulatory Requirements

5. On November 15, 1990, the President signed into law the CAA Amendments of 1990. The Amendments added Section 112(r) to Title I of the CAA, 42 U.S.C. § 7412(r), which requires the Administrator of EPA to, among other things, promulgate regulations in order to prevent accidental releases of certain regulated substances. Section 112(r)(3), 42 U.S.C. § 7412(r)(3), mandates the Administrator to promulgate a list of regulated substances, with threshold quantities, and defines the stationary sources that will be subject to the accident prevention regulations mandated by Section 112(r)(7). Specifically, Section 112(r)(7), 42 U.S.C. § 7412(r)(7), requires the Administrator to promulgate regulations that address release prevention, detection and correction requirements for these listed regulated substances.

6. On June 20, 1996, EPA promulgated a final rule known as the Risk Management Program, 40 C.F.R. Part 68, which implements Section 112(r)(7) of the CAA, 42 U.S.C. § 7412(r)(7). This rule requires owners and operators of stationary sources to develop and implement a risk management program that includes a hazard assessment, a prevention program and an emergency response program.

7. The regulations at 40 C.F.R. Part 68 set forth the requirements of a risk management program that must be established at each stationary source. The risk management program is described in a Risk Management Plan ("RMP") that must be submitted to EPA.

8. Pursuant to Section 112(r)(7) of the CAA, 42 U.S.C. § 7412(r)(7), and 40 C.F.R. § 68.150, the RMP must be submitted for all covered processes by the owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process no later than the latter of June 21, 1999, or the date on which a regulated substance is first present above the threshold quantity in a process.

9. The regulations at 40 C.F.R. § 68.10 set forth how the chemical accident prevention provision regulations apply to different types of covered processes. A covered process is eligible for Program 2 if the process does not meet the requirements of Program 1 or Program 3.

10. Section 113(d) of the CAA, 42 U.S.C. § 7413(d), states that the Administrator may issue an administrative order against any person assessing a civil administrative penalty of up to \$25,000 per day of violation whenever, on the basis of any available information, the Administrator finds that such person has violated or is violating any requirement or prohibition of the CAA referenced therein, including Section 112(r)(7). Section 113(d) of the CAA, 42 U.S.C. § 7413(d), as amended by the Debt Collection Improvement Act of 1996, authorizes the United States to assess civil administrative penalties of not more than \$27,500 per day for each violation that occurs after January 30, 1997, through March 15, 2004, and \$32,500 per day for each violation that occurs after March 15, 2004. For each violation of Section 112(r) of the CAA that occurs after January 12, 2009, penalties of up to \$37,500 per day are now authorized.

Definitions

11. The regulations at 40 C.F.R. § 68.3 define “stationary source,” in part, as any buildings, structures, equipment, installations or substance emitting stationary activities which belong to the same industrial group, which are located on one or more contiguous properties, which are under the control of the same person (or persons under common control), and from which an accidental release may occur.

12. The regulations at 40 C.F.R. § 68.3 define “threshold quantity” as the quantity specified for regulated substances pursuant to Section 112(r)(5) of the CAA, as amended, listed in 40 C.F.R. § 68.130, Table 1, and determined to be present at a stationary source as specified in 40 C.F.R. § 68.115.

13. The regulations at 40 C.F.R. § 68.3 define “regulated substance” as any substance listed pursuant to Section 112(r)(3) of the CAA, as amended, in 40 C.F.R. § 68.130.

14. The regulations at 40 C.F.R. § 68.3 define “process” as any activity involving a regulated substance including any use, storage, manufacturing, handling or on-site movement of such substances, or combination of these activities. For the purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

Factual Allegations

15. Respondent is, and at all times referred to herein was, a “person” as defined by Section 302(e) of the Clean Air Act, 42 U.S.C. § 7602(e).

16. Respondent is the owner and/or operator of a facility that receives, stores, and sells anhydrous ammonia as fertilizer, located at 205 1st Street, in Dixon, Nebraska. The facility is a “stationary source” pursuant to 40 C.F.R. § 68.3.

17. At all times relevant to this action, Respondent processed, handled and stored anhydrous ammonia at its facility.

18. Anhydrous ammonia is a regulated substance pursuant to 40 C.F.R. § 68.3. The threshold quantity for anhydrous ammonia, as listed in 40 C.F.R. § 68.130, Table 1, is 10,000 pounds.

19. On or about August 29, 2012, EPA conducted an inspection of Respondent’s facility to determine compliance with Section 112(r) of the CAA and 40 C.F.R. Part 68. Information collected during the EPA inspection revealed that Respondent had exceeded the threshold quantity for anhydrous ammonia at its facility.

Violations

20. EPA alleges that Respondent has violated the CAA and federal regulations promulgated pursuant to the CAA, as follows:

21. Respondent is subject to the requirements of Section 112(r) of the CAA, 42 U.S.C. § 7412(r), and 40 C.F.R. Part 68, because it is an owner and operator of a stationary source that had more than a threshold quantity of a regulated substance in a process.

22. Respondent is subject to Program 2 of the risk management program requirements because, pursuant to 40 C.F.R. § 68.10(c), the covered process does not meet the requirements of Program 1 or Program 3.

COUNT I

23. 40 C.F.R. § 68.12(c)(1) requires Respondent to develop and implement a management system, as provided in 40 C.F.R. § 68.15, to oversee the implementation of the risk management program elements.

24. The EPA inspection referenced in Paragraph 19, above, revealed that Respondent did not develop and implement a management system.

25. Respondent’s failure to comply with 40 C.F.R. §§ 68.12(c)(1) violates Section 112(r) of the CAA, 42 U.S.C. § 7412(r).

COUNT II

26. 40 C.F.R. § 68.12(c)(2) requires Respondent to conduct a hazard assessment as provided in 40 C.F.R. §§ 68.20 through 68.42.

27. The EPA inspection referenced in Paragraph 19, above, revealed that Respondent did not conduct a hazard assessment.

28. Respondent's failure to comply with 40 C.F.R. §§ 68.12(c)(2) violates Section 112(r) of the CAA, 42 U.S.C. § 7412(r).

COUNT III

29. 40 C.F.R. § 68.12(c)(3) requires Respondent to implement the Program 2 prevention steps provided in §§ 68.48 through 68.60 or implement the Program 3 prevention steps provided in §§ 68.65 through 68.87. Program 2 prevention steps include requirements related to safety information, hazard review, operating procedures, training, maintenance, and compliance audits, and incident investigations. Program 3 prevention steps include requirements related to process safety information, process hazard analysis, operating procedures, training, mechanical integrity, management of change, pre-startup review, compliance audits, incident investigation, hot work permits, and contractors.

30. The EPA inspection referenced in Paragraph 19, above, revealed that though Respondent had taken some actions that overlap with Program 2 prevention steps, Respondent did not implement many of the Program 2 or Program 3 prevention steps.

31. Respondent's failure to comply with 40 C.F.R. §§ 68.12(c)(3) violates Section 112(r) of the CAA, 42 U.S.C. § 7412(r).

COUNT IV

32. 40 C.F.R. § 68.12(c)(4) requires Respondent to develop and implement an emergency response program as provided in 40 C.F.R. §§ 68.90 to 68.95.

33. The EPA inspection referenced in Paragraph 19, above, revealed that Respondent did not develop and implement an emergency response program.

34. Respondent's failure to comply with 40 C.F.R. §§ 68.12(c)(4) violates Section 112(r) of the CAA, 42 U.S.C. § 7412(r).

COUNT V

35. Respondent is required under Section 112(r) of the CAA, 42 U.S.C. § 7412(r),

and 40 C.F.R. §§ 68.12(a) and 68.150(a), to submit a single Risk Management Plan (“RMP”).

36. A search of EPA records revealed, and the EPA inspection referenced in Paragraph 19 above confirmed, that Respondent failed to submit an RMP.

37. Respondent’s failure to comply with 40 C.F.R. §§ 68.12(a) and 68.150(a) violates Section 112(r) of the CAA, 42 U.S.C. § 7412(r).

38. Pursuant to Section 113(d) of the CAA, 42 U.S.C. § 7413(d), it is proposed that a civil penalty be assessed against Respondent for the violations of the CAA identified above, the amount of which is set forth in Paragraph 1 of the Final Order below.

CONSENT AGREEMENT

39. Respondent and EPA agree to the terms of this CA/FO and Respondent agrees to comply with the terms of the Final Order portion of this CA/FO.

40. For purposes of this proceeding, Respondent admits the jurisdictional allegations set forth above, and agrees not to contest EPA’s jurisdiction in this proceeding or in any subsequent proceeding to enforce the terms of the Final Order portion of this CA/FO.

41. Respondent neither admits nor denies the factual allegations set forth above.

42. Respondent waives its right to a judicial or administrative hearing on any issue of fact or law set forth above and its right to appeal the proposed Final Order portion of this CA/FO.

43. Respondent and EPA agree to conciliate this matter without the necessity of a formal hearing and to bear their respective costs and attorneys’ fees incurred as a result of this action.

44. This CA/FO addresses all civil and administrative claims for the CAA violations identified above. Complainant reserves the right to take enforcement action with respect to any other violations of the CAA or other applicable law.

45. Respondent certifies by signing this CA/FO that, to the best of its knowledge, Respondent’s facility is in compliance with all requirements of Section 112(r) of the CAA, 42 U.S.C. § 7412(r), and all regulations promulgated thereunder.

46. The effect of settlement described in Paragraph 44 is conditional upon the accuracy of the Respondent’s representations to EPA, as memorialized in Paragraph 45 of this CA/FO.

47. Respondent consents to the issuance of the Final Order hereinafter recited, consents to the payment of the civil penalty as set forth in the Final Order, and consents to the performance of a Supplemental Environmental Project.

48. In settlement of this matter, Respondent agrees to complete the following Supplemental Environmental Project ("SEP"), which the parties agree is intended to secure significant environmental and/or public health benefits. Respondent shall donate grain entrapment equipment and tube and winch systems to two local fire departments, as described in Attachment A which is incorporated herein by reference. In addition, Respondent shall donate equipment to one fire department enabling storage of rescue equipment on a rescue vehicle. The SEP shall be completed no later than three months from the effective date of the Final Order.

49. The total expenditure for the SEP shall be no less than Twelve Thousand Dollars (\$12,000), in accordance with the specifications set forth in Attachment A. All work required to complete the SEP shall be performed in compliance with all federal, state, and local laws and regulations.

50. Within 60 days of completion of the SEP, Respondent shall submit a SEP Completion Report to EPA as follows:

- a. The SEP Completion Report shall contain the following:
 - i. a detailed description of the SEP as implemented;
 - ii. itemized costs, documented by copies of purchase orders, receipts, or canceled checks;
 - iii. a description of the environmental and public health benefits resulting from implementation of the SEP (with a quantification of the benefits and pollutant reductions, if feasible); and
 - iv. certification that the SEP has been fully implemented pursuant to the provisions of this CA/FO.
- b. Respondent shall submit all notices and reports required by this CA/FO by first class mail to the following:

Patricia Reitz
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219.

- c. In itemizing its costs in the SEP Completion Report, Respondent shall clearly identify and provide acceptable documentation for all eligible SEP costs. Where the report includes costs not eligible for SEP credit, those costs must be clearly identified as such. For purposes of this paragraph, "acceptable documentation" includes invoices, purchase orders or other documentation that specifically identifies and itemizes the individual costs of the goods and/or services for which payment is being made. Canceled drafts do not constitute acceptable documentation unless such drafts specifically identify and itemize the individual costs of the goods and/or services for which payment is being made.

51. Respondent agrees to the payment of stipulated penalties as follows:

- a. In the event Respondent fails to comply with any of the terms or provisions of this Consent Agreement relating to the performance of the SEP as set forth in Paragraph 36 of this CA/FO and/or to the extent that the actual expenditures of the SEP do not equal or exceed the cost of the SEP described in Paragraph 37 of this CA/FO, Respondent shall be liable for stipulated penalties according to the provisions set forth below:
 - i. Except as provided in subparagraph a.ii. and a.iii. of this paragraph, if the SEP is not completed satisfactorily and timely pursuant to the agreement set forth in Paragraph 36 of this CA/FO, Respondent shall be liable for and shall pay a stipulated penalty to the United States in the amount of Twelve Thousand Six Hundred Dollars (\$12,600) (150% of the amount by which the settlement penalty was mitigated on account of the SEP), minus any documented expenditures determined by EPA to be acceptable for the SEP.
 - ii. If Respondent fails to timely and completely submit the SEP Completion Report required by Paragraph 38, Respondent shall be liable for and shall pay a stipulated penalty in the amount of Two Hundred and Fifty Dollars (\$250) per day. This stipulated penalty shall begin to accrue on the first day after the SEP Completion Report is due and continue to accrue through the day the SEP Completion report is submitted.
 - iii. If the SEP is not completed in accordance with Paragraphs 36 and 37 of this CA/FO, but EPA determines that the Respondent: (a) made good faith and timely efforts to complete the project; and (b) certifies, with supporting documentation, that at least 90% of the amount of money which was required to be spent was expended on the SEP, Respondent shall not be liable for any stipulated penalty.

- b. The determinations of whether the SEP has been satisfactorily completed and whether the Respondent has made a good faith, timely effort to implement the SEP shall be in the sole discretion of EPA.
- c. Respondent shall pay stipulated penalties not more than fifteen days after receipt of written demand by EPA for such penalties. The method of payment shall be in accordance with the provisions of Paragraph 1 of the Final Order portion of this CA/FO. Interest and late charges shall be paid as stated in Paragraph 44 herein.

52. Respondent certifies that it is not required to perform or develop the SEP by any federal, state, or local law or regulation; nor is Respondent required to perform or develop the SEP by agreement, grant or as injunctive relief in this or any other case or to comply with state or local requirements. Respondent further certifies that Respondent has not received, and is not presently negotiating to receive, credit in any other enforcement action for the SEP.

53. Respondent certifies that it is not a party to any open federal financial assistance transaction that is funding or could be used to fund the same activity as the SEP. Respondent further certifies that, to the best of its knowledge and belief after reasonable inquiry, there is no such open federal financial transaction that is funding or could be used to fund the same activity as the SEP, nor has the same activity been described in an unsuccessful federal financial assistance transaction proposal submitted to EPA within two years of the date of this settlement (unless the project was barred from funding as statutorily ineligible). For the purposes of this certification, the term "open federal financial assistance transaction" refers to a grant, cooperative agreement, loan, federally-guaranteed loan guarantee or other mechanism for providing federal financial assistance whose performance period has not yet expired.

54. For federal income tax purposes, Respondent agrees that it will neither capitalize into inventory or basis nor deduct any costs or expenditures incurred in performing the SEP.

55. Any public statement, oral or written, in print, film or other media, made by Respondent making reference to the SEP shall include the following language: "This project was undertaken in connection with the settlement of an enforcement action taken by the United States Environmental Protection Agency for violations of the chemical accident prevention provisions of the Clean Air Act."

56. Late Payment Provisions. Pursuant to 31 U.S.C. § 3717, EPA is entitled to assess interest and penalties on debts owed to the United States and a charge to cover the cost of processing and handling a delinquent claim. Respondent understands that its failure to timely pay any portion of the civil penalty described in Paragraph 1 of the Final Order below may result in the commencement of a civil action in Federal District Court to recover the full remaining balance, along with penalties and accumulated interest. In such case, interest shall

accrue thereon at the applicable statutory rate on the unpaid balance until such civil or stipulated penalty and any accrued interest are paid in full.

57. The undersigned representative of Respondent certifies that he or she is fully authorized to enter the terms and conditions of this CA/FO and to legally bind Respondent to it.

58. Nothing contained in the Final Order portion of this CA/FO shall alter or otherwise affect Respondent's obligation to comply with all applicable federal, state, and local environmental statutes and regulations and applicable permits.

FINAL ORDER

Pursuant to the provisions of the CAA, 42 U.S.C. § 7401 *et seq.*, and based upon the information set forth in this Consent Agreement, IT IS HEREBY ORDERED THAT:

1. Respondent shall pay a civil penalty of Twenty-Seven Thousand One Hundred and Fifty dollars (\$27,150) within thirty days of entry of this Final Order. Payment shall be by cashier's or certified check made payable to "United States Treasury," and shall be remitted to:

United State Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
Post Office Box 979077
St. Louis, Missouri 63197-9000.

This payment shall reference docket number CAA-07-2015-0017.

2. Copies of the check should be sent to:

Regional Hearing Clerk
United States Environmental Protection Agency - Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

and to:

Erin Weekley
Assistant Regional Counsel
United States Environmental Protection Agency - Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219.

3. Respondent and Complainant shall bear their own costs and attorneys' fees incurred as a result of this matter.

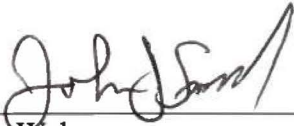
4. No portion of the civil penalty or interest paid by Respondent pursuant to the requirements of this CA/FO shall be claimed by Respondent as a deduction for federal, state, or local income tax purposes.

5. This Final Order shall apply to and be binding upon Respondent and Respondent's agents, successors, and/or assigns. Respondent shall ensure that all contractors, employees, consultants, firms or other persons or entities acting for Respondent with respect to matters included herein comply with the terms of this CA/FO.

6. The effective date of this Order shall be the date on which it is signed by the Regional Judicial Officer.

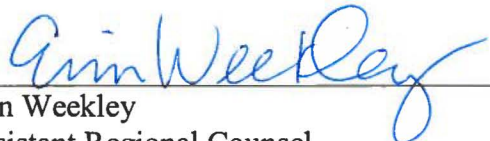
COMPLAINANT:
U.S. ENVIRONMENTAL PROTECTION AGENCY

Date 5/14/15



Becky Weber
Director, Air and Waste Management Division
U.S. Environmental Protection Agency
Region 7

Date 5/14/15



Erin Weekley
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region 7

RESPONDENT:
DIXON ELEVATOR CO.

Date 4/9/15

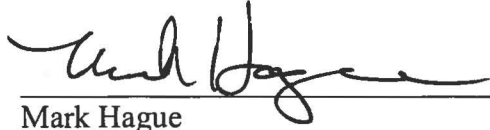
Jeffrey L Hartung
Name

Jeffrey L Hartung
Signature

President
Title

IT IS SO ORDERED. This Final Order shall become effective immediately.

Date 5-18-15



Mark Hague
Acting Regional Administrator
U.S. Environmental Protection Agency
Region 7

IN THE MATTER OF Dixon Elevator Co., Respondent
Docket No. CAA-07-2015-0017

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Order was sent this day in the following manner to the addressees:

Copy by email to Attorney for Complainant:

weeley.erin@epa.gov


Copy by First Class Mail to:

Jeffrey Hartung
President, Dixon Elevator
205 1st Street
P.O. Box 8
Dixon, Nebraska 68732

and

Michael J. Linder
Koley Jessen P.C., L.L.O.
1125 S. 103rd Street, Suite 800
Omaha, Nebraska 68124

Dated: 5/18/15


Kathy Robinson
Hearing Clerk, Region 7

Attachment A

Supplemental Environmental Project (SEP)

Dixon Elevator Company

The SEP for this matter will be for Dixon Elevator Company to provide two Volunteer Fire Departments in the Dixon, Nebraska area with funds to purchase grain entrapment equipment and tube and winch system at an approximate cost of \$3,500.00 each or \$7,000.00 total.

The equipment identified for this SEP is the GSI RES-Q Tube or a similar and comparable product. Any necessary additional equipment needed to make the RES-Q Tube functional for the Fire Departments will be included in the SEP.

In addition, one of the Volunteer Fire Departments is equipping a rescue vehicle (a one ton pickup truck) with a new deck and water tank along with equipment to enable it to store rescue equipment. That equipment will be procured by Dixon VFD from Danko Emergency Equipment Company in Synder, Nebraska for a total of \$21,421.00. The SEP contribution to this equipment will be the difference between the cost of the RES-Q Tubes and \$12,000.00.



PROVEN & DEPENDABLE™
GRAIN STORAGE | MATERIAL HANDLING | GRAIN DRYING

SAFETY

Grain Storage Drying & Conditioning Material Handling Safety Literature Dealer Information Technical Support

Search by Category:

- All
 Farm Commercial
 Brochures Manuals

RES-Q Tube

Literature Downloads:

Brochure Download

Proper hands-on training is required for safe use of this equipment. The following instructions are general and may require modifications and/or adjustments to successfully complete a rescue based on the actual conditions.

1. Assess the situation, keep constant communication with victim.
2. Shut off and lock out all grain handling/conveyance equipment.
3. Turn on aeration fans (if available).
4. Call for help – First responders/Mutual Aid
5. If victim is fully engulfed, cut equally spaced "V" cuts in the bin (2 minimum) to remove grain/locate victim (never cut across rows of vertical or horizontal bolts).
6. If victim is partially engulfed, or once located, send in one properly equipped rescuer.
7. Approach the victim from their back/sides to lessen the amount of grain avalanching against the victims chest/face.
8. If grain is against victims chest/face, insert 1 piece of RES-Q tube in front of victim and clear grain away to aid breathing.
9. Secure victim with a chest harness/tag line.
10. Administer medical attention victim might require.
11. Install entire RES-Q tube (4 pieces) around victim (insure that pieces mate/seal and form a uniform circle) by inserting each individual

[> Home > Safety > RES-Q Tube](#)

RES-Q Tube

GSI's RES-Q tube aids in rescue during a grain engulfment if a portion of the victim is above the grain and if the grain surrounding the victim is higher than the exposed portion of the victim. GSI's RES-Q tube is made of a lightweight aluminum for ease of transport and use.

Prepare to Save: Lives. Time. Money. Peace of Mind.

A 60" tall, 27 pound shield is constructed to fit around the victim with 3 additional shields (30" diameter complete), to stop the flow of the grain toward the victim and block any additional pressure that may be created from rescuers. Once in place, the now limited amount of grain inside the tube is removed to free the victim.

[RES-Q Tube Engulfment Simulation Video](#)

[WINDOWS MEDIA FILE 25 MB](#)

For information on the GSI RES-Q Trainer and/or to schedule training in your area [CLICK HERE](#)

The table at right shows the amount of time (in seconds on the left) it takes for a 165 lb. person to be engulfed in grain with a typical 10" unload auger in operation, and the amount of pressure placed on that individual at each stage of the engulfment.

RES-Q-tube

