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

EXPEDITED SETTLEMENT AGREEMENT (ESA)

DOCKET NO.: CAA-07-2015-0012

This ESA is issued to: Orrick Farm Service, Inc.

At: 208 East North Front Street, Orrick, Missouri, 64077
for violating Section 112(r)(7) of the Clean Air Act.

The United States Environmental Protection Agency, Region 7 (EPA) and Orrick Farm Service, Inc. (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), 22.18(b)(2).

The Complainant, by delegation of the Administrator of the EPA, is the Director of the Air and Waste Management Division. The Respondent is Orrick Farm Service, Inc., 208 East North Front Street, Orrick, Missouri, 64077.

This is an administrative action for the assessment of civil penalties instituted pursuant to Section 113(d) of the Clean Air Act (CAA). Pursuant to Section 113(d) of the CAA, 42 U.S.C. §7413(d), the Administrator and the Attorney General jointly determined that cases which meet the criteria set forth in EPA's policy entitled "Use of Expedited Settlements in Addressing Violations of the Clean Air Act Chemical Accident Prevention Provision, 40 C.F.R. Part 68," dated January 5, 2004, are appropriate for administrative penalty action.

ALLEGED VIOLATIONS

On July 23, 2013, an authorized representative of the EPA conducted a compliance inspection of the Respondent's facility located at 208 East North Front Street, Orrick, Missouri, to determine compliance with the Risk Management Plan (RMP) regulations promulgated at 40 C.F.R. Part 68 under Section 112(r) of the CAA. The EPA found that the Respondent had violated regulations implementing Section 112(r) of the CAA by failing to comply with the regulations as noted on the enclosed Risk Management Program Inspection Findings (RMP Findings), which is hereby incorporated by reference.

SETTLEMENT

In consideration of Respondent's size of business, its full compliance history, its good faith effort to comply, and other factors as justice may require, and upon consideration of the

entire record, the parties enter into the ESA in order to settle the violations, described in the enclosed RMP Findings, for the total penalty amount of **\$ 6,600**.

This settlement is subject to the following terms and conditions:

The Respondent by signing below waives any objections that it may have regarding jurisdiction, neither admits nor denies the specific factual allegations contained herein and in the RMP Findings, and consents to the assessment of the penalty as stated above. Respondent waives its rights to a hearing afforded by Section 113(d)(2)(A) of the CAA, 42 U.S.C. §7413(d)(2)(A), and to appeal this ESA. Each party to this action shall bear its own costs and fees, if any. Respondent also certifies, subject to civil and criminal penalties for making a false submission to the United States Government, that the Respondent has corrected the violations listed in the enclosed RMP Findings and has sent a cashier's check or certified check (payable to the "United States Treasury") in the amount of **\$6,600** in payment of the full penalty amount to the following address:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, Missouri 63197-9000

The Docket Number of this ESA is CAA-07-2015-0012, and must be included on the check.

This original ESA, a copy of the completed RMP Findings, and a copy of the check must be sent by certified mail to:

Amber Whisnant
Chemical Risk Information Branch
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219.

A copy of the check must also be sent to:

Kathy M. Robinson
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219.

Upon Respondent's submission of the signed original ESA, the EPA will take no further civil action against Respondent for the alleged violations of the CAA referenced in the RMP

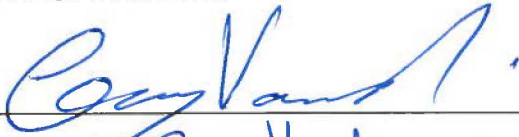
Findings. The EPA does not waive any other enforcement action for any other violations of the CAA or any other statute.

If the signed original ESA with an attached copy of the check is not returned to the EPA Region 7 office at the above address in correct form by the Respondent within 45 days of the date of Respondent's receipt of it (90 days if an extension is granted), the proposed ESA is withdrawn, without prejudice to EPA's ability to file an enforcement action for the violations identified herein and in the RMP Findings.

This ESA is binding on the parties signing below.

This ESA is effective upon filing with the Regional Hearing Clerk.

FOR RESPONDENT:



Date: 3-2-15

Name (print): Gary Vandier

Title (print): Manager
Orrick Farm Service, Inc.

FOR COMPLAINANT:



for Becky Weber
Director
Air and Waste Management Division
EPA Region 7

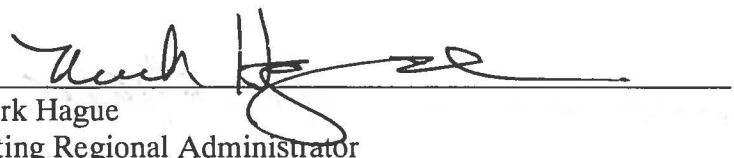
Date: 5/15/15



Kent Johnson
Assistant Regional Counsel
Office of Regional Counsel
EPA Region 7

Date: 5/15/15

I hereby ratify the ESA and incorporate it herein by reference. It is so ORDERED.



Mark Hague
Acting Regional Administrator

Date: 5-15-15

2/2/12



Risk Management Program Inspection Findings
CAA § 112(r) Violations

Orrick Farm Service, Inc.
208 East North Front Street
Orrick, Missouri 64077
Docket No. CAA-07-2015-0012

COMPLETE THIS FORM AND RETURN IT WITH THE ESA.

VIOLATIONS

PENALTY AMOUNT

Hazard Assessment

\$600

Defining offsite impacts-population [§ 68.30(a)]

The owner or operator failed to estimate in the RMP the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint. Specifically, the coordinates for the Worst Case Scenario and Alternate Case Scenario are not based on the point of release.

How was this addressed:

Changed with the new census data in the June, 2014, 5 year update

Prevention Program

\$300

Safety Information [§ 68.48(a)(2)]

The owner or operator failed to compile and maintain an up-to-date maximum intended inventory of equipment in which the regulated substances are stored or processed. Specifically, the facility failed to include a railroad tank car capacity in its maximum intended inventory.

How was this addressed:

This was addressed in the Hazard Review that was updated in the June, 2014, 5 year update

VIOLATIONS

PENALTY AMOUNT

Prevention Program

\$300

Safety Information [§ 68.48(a)(4)]

The owner or operator failed to compile and maintain an up-to-date equipment specifications. Specifically, the 30,000-gallon storage vessel did not have a data plate or U-1 form at this time of the inspection. On October 14, 2013, Mr. Vandiver emailed the EPA inspector photos showing the data plate which was found post inspection. Confirm with documentation that the dataplate or a replacement has been reattached.

How was this addressed:

Data Plate was found & replaced

See Attached documentation

Prevention Program

\$300

Safety Information [§ 68.48(a)(5)]

The owner or operator failed to compile and maintain a copy of the codes and standards used to design, build, and operate the process. Specifically, the facility referenced that they use ANSI Standards in the RMP but did not have a copy of the standard.

To address this issue: Before the inspectors concluded the inspection, Mr. Vandiver did obtain a copy of the ANSI Standard K61.1-1999.

Prevention Program

\$1,500

Safety Information [§ 68.48(b)]

The owner or operator failed to ensure that the process is designed in compliance with recognized and generally accepted good engineering practices. Specifically, the anhydrous ammonia storage vessels were located within 100' of an active railroad mainline, one anhydrous ammonia storage vessel's support was cracked and crumbling, and the 30,000-gallon storage vessel lacked a data plate and had ineffective vehicle barriers.

How was this addressed:

The June, 2014 RMP Hazard Review specifically addresses this issue.

Barriers were installed and the vessel support was replaced

VIOLATIONS

PENALTY AMOUNT

Prevention Program

No Penalty Assessed

Hazard Review [§ 68.50(a-b)]

The owner or operator failed to identify all hazards associated with the process and failed to ensure the hazard review, by inspecting all equipment, determines whether the process is designed, fabricated and operated in accordance with the applicable standards or rules.

Specifically, the hazard review should have included the hazard associated with vessels being located less than 100' of a railroad mainline and the hazard review should have identified the one storage vessel's support showing signs of decay (cracked and crumbling).

How was this addressed:

The June 2014 RMP update addresses this issue.

The barriers were installed and the support was replaced

Prevention Program

\$1,200

Operating Procedures [§ 68.52(b)(7)]

The owner or operator failed to prepare written operating procedures that address the consequences of deviation and steps required to correct or avoid deviations.

How was this addressed:

This was addressed in the June, 2014 RMP update and new operating procedures were written

Prevention Program

\$1,200

Compliance Audits [§ 68.58(a)]

The owner or operator failed to evaluate compliance with the provisions of this subpart to verify that the procedures and practices developed under the rule are adequate and are being followed. Specifically, the compliance audit findings incorrectly stated that the facility did have codes and standards available at the facility, that equipment specifications are available, that the maximum inventory is defined, that the facility is constructed in accordance with accepted engineering practices, that the hazard review identified equipment malfunctions or human error, and that the operating procedures address consequences of deviations and steps to correct or avoid them.

VIOLATIONS

PENALTY AMOUNT

How was this addressed:

A compliance audit was done for the June 2014 RMP update

Prevention Program

\$1,200

Incident Investigation [§ 68.60(a)]

The owner or operator failed to investigate each incident which resulted in, or could reasonably have resulted in a catastrophic release. Specifically, the investigation the facility conducted was missing the following elements: the summary did not include the date the investigation began or any recommendations resulting from the investigation, and the owner/operator did not document any resolutions and corrective actions.

How was this addressed:

I now understand that I need to do an incident report
regardless of whether it is a reportable amount or not.

Risk Management Plan

No penalty assessed

Prevention Program [§ 68.170(j)]

The owner or operator failed to provide in the RMP the date of the most recent incident investigation and the expected date of completion of any changes resulting from the investigation. Specifically, the latest RMP submitted on 06-18-2014 does not list the incident investigation from 3-29-2012.

How was this addressed:

We will update our RMP to reflect this incident.
We now understand that this incident needed to be
investigated + reported.

VIOLATIONS

PENALTY AMOUNT

Risk Management Plan
Emergency Response Program [§ 68.180]

No penalty assessed

The owner or operator failed to submit an RMP that correctly included the information required regarding the emergency response program. Specifically, the facility is a non-responding facility to an accidental release of anhydrous ammonia, and the RMP submittal indicated that they are a responding facility. Actually, the facility relies on the LEPC/Fire Department to respond to accidental releases.

How was this addressed:

*The information on my RMP on this subject has been
revised to reflect the changes as of June 2014,*

Total Unadjusted Penalty

\$6,600

Orrick Farm Service is a private company which has 11 full time employees supplemented by 3-5 temporary employees during the busy season; 50 to 66 times the threshold amount for anhydrous ammonia. After adding the penalty numbers in the Risk Management Program Inspection Findings, Alleged Violations and Proposed Penalty Sheet an unadjusted penalty of \$ 6,600 is derived.

Calculation of Adjusted Penalty

1st Reference the multipliers for calculating proposed penalties for violations found during RMP inspection matrix. Finding the row for number of employees between 10-100 and column for >10 times the threshold quantity of 10,000 pounds of the regulated chemicals as listed in 40 C.F.R. Part 68,130 for the amount in a process gives a multiplier factor of 1.0. Therefore, the multiplier for Orrick Farm Service = 1.0.

2nd Adjusted Penalty = \$6,600 (Unadjusted Penalty) X 1.0 (Size-Threshold Multiplier)
Adjusted Penalty = \$6,600.

3rd An Adjusted Penalty of \$6,600 would be assessed to Orrick Farm Service for violations found during the RMP Compliance Inspection. This amount will be found in the Expedited Settlement Agreement (ESA).


Total Adjusted Penalty

\$6,600.

This section must also be completed and signed by Orrick Farm Service, Inc.:

The approximate cost to correct the above items: \$ 62,300-

Compliance staff name: Cary Vandiver

Signed:  Date: 3-2-15

Risk Management Program Inspection Findings
CAA § 112(r) Violations

Orrick Farm Service, Inc.
208 East North Front Street
Orrick, Missouri 64077
Docket No. CAA-07-2015-0012

COMPLETE THIS FORM AND RETURN IT WITH THE ESA.

VIOLATIONS

PENALTY AMOUNT

Hazard Assessment

\$600

Defining offsite impacts-population [§ 68.30(a)]

The owner or operator failed to estimate in the RMP the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint. Specifically, the coordinates for the Worst Case Scenario and Alternate Case Scenario are not based on the point of release.

How was this addressed:

This was addressed by changing with the new census data
in the June, 2014, 5 year, RMP update.

Prevention Program

\$300

Safety Information [§ 68.48(a)(2)]

The owner or operator failed to compile and maintain an up-to-date maximum intended inventory of equipment in which the regulated substances are stored or processed. Specifically, the facility failed to include a railroad tank car capacity in its maximum intended inventory.

How was this addressed:

We start the process of updating our RMP for the 5 year update
in December. The Hazard Review dated 12-12-2013 is correct. A copy
is attached. We should not add an additional 160,000 pounds for railcar
storage since we do not use railcars for storage. If we receive
a railcar it would be to fill the storage tank and nurse tanks which
is already accounted for in the maximum inventory.

VIOLATIONS

PENALTY AMOUNT

Prevention Program

\$300

Safety Information [§ 68.48(a)(4)]

The owner or operator failed to compile and maintain an up-to-date equipment specifications. Specifically, the 30,000-gallon storage vessel did not have a data plate or U-1 form at this time of the inspection. On October 14, 2013, Mr. Vandiver emailed the EPA inspector photos showing the data plate which was found post inspection. Confirm with documentation that the dataplate or a replacement has been reattached.

How was this addressed:

The data plate was found and replaced

The documentation is attached

Prevention Program

\$300

Safety Information [§ 68.48(a)(5)]

The owner or operator failed to compile and maintain a copy of the codes and standards used to design, build, and operate the process. Specifically, the facility referenced that they use ANSI Standards in the RMP but did not have a copy of the standard.

To address this issue: Before the inspectors concluded the inspection, Mr. Vandiver did obtain a copy of the ANSI Standard K61.1-1999.

Prevention Program

\$1,500

Safety Information [§ 68.48(b)]

The owner or operator failed to ensure that the process is designed in compliance with recognized and generally accepted good engineering practices. Specifically, the anhydrous ammonia storage vessels were located within 100' of an active railroad mainline, one anhydrous ammonia storage vessel's support was cracked and crumbling, and the 30,000-gallon storage vessel lacked a data plate and had ineffective vehicle barriers.

How was this addressed:

The June, 2014, RMP Hazard Review specifically addresses this issue.

Barriers were installed + the vessel support was replaced.

VIOLATIONS

PENALTY AMOUNT

Prevention Program

No Penalty Assessed

Hazard Review [§ 68.50(a-b)]

The owner or operator failed to identify all hazards associated with the process and failed to ensure the hazard review, by inspecting all equipment, determines whether the process is designed, fabricated and operated in accordance with the applicable standards or rules. Specifically, the hazard review should have included the hazard associated with vessels being located less than 100' of a railroad mainline and the hazard review should have identified the one storage vessel's support showing signs of decay (cracked and crumbling).

How was this addressed:

The June, 2014, RMP update addresses this issue.
The barriers were installed and the support was replaced.

Prevention Program

\$1,200

Operating Procedures [§ 68.52(b)(7)]

The owner or operator failed to prepare written operating procedures that address the consequences of deviation and steps required to correct or avoid deviations.

How was this addressed:

This was addressed in the June, 2014 RMP update and new operating procedures were written.

Prevention Program

\$1,200

Compliance Audits [§ 68.58(a)]

The owner or operator failed to evaluate compliance with the provisions of this subpart to verify that the procedures and practices developed under the rule are adequate and are being followed. Specifically, the compliance audit findings incorrectly stated that the facility did have codes and standards available at the facility, that equipment specifications are available, that the maximum inventory is defined, that the facility is constructed in accordance with accepted engineering practices, that the hazard review identified equipment malfunctions or human error, and that the operating procedures address consequences of deviations and steps to correct or avoid them.

10/10/10

10/10/10

Dear Sir,
I have the pleasure to inform you that your application for a grant of probate in respect of the estate of the late Mr. John Smith has been granted by the court. The grant is subject to the usual conditions and is valid from the date of the grant.

You will receive a copy of the grant and the court's order in due course. If you have any queries, please contact the court office.

Yours faithfully,
The Registrar

Enclosed for you are the following documents:
1. A copy of the grant of probate.
2. A copy of the court's order.
3. A copy of the inventory of the estate.

VIOLATIONS

PENALTY AMOUNT

How was this addressed:

A compliance audit was done for the June, 2014 RMP update.
In the future, I will take a team approach to completing
compliance audits. By utilizing myself and my two certified
Ammonia technicians, we should better compile a proper Prevention
Program.

Prevention Program

\$1,200

Incident Investigation [§ 68.60(a)]

The owner or operator failed to investigate each incident which resulted in, or could reasonably have resulted in a catastrophic release. Specifically, the investigation the facility conducted was missing the following elements: the summary did not include the date the investigation began or any recommendations resulting from the investigation, and the owner/operator did not document any resolutions and corrective actions.

How was this addressed:

I now understand that I need to do an incident report
regardless of whether it is a reportable amount or not.

Risk Management Plan

No penalty assessed

Prevention Program [§ 68.170(j)]

The owner or operator failed to provide in the RMP the date of the most recent incident investigation and the expected date of completion of any changes resulting from the investigation. Specifically, the latest RMP submitted on 06-18-2014 does not list the incident investigation from 3-29-2012.

How was this addressed:

We have updated our RMP to reflect this incident and
have put it in section 8 of the RMP as you have instructed.

VIOLATIONS

PENALTY AMOUNT

Risk Management Plan

No penalty assessed

Emergency Response Program [§ 68.180]

The owner or operator failed to submit an RMP that correctly included the information required regarding the emergency response program. Specifically, the facility is a non-responding facility to an accidental release of anhydrous ammonia, and the RMP submittal indicated that they are a responding facility. Actually, the facility relies on the LEPC/Fire Department to respond to accidental releases.

How was this addressed:

The information on my RMP on this subject has been revised to reflect the changes as of June, 2014.

Original
COPY

REPLACEMENT OF STAMPED DATA FORM
in accordance with provisions of the *National Board Inspection Code*

Submitted to
Joe Brockman
(name of jurisdiction)
205 Jefferson St. 13th Floor
(address)
Jefferson City MO 65102
573-751-8708
(telephone no.)

Submitted by
Buckler Tank Repair, LLC
(name of owner.)
209 S. Commercial St.
(address)
Dearborn MO 64439
(816) 898-9024
(telephone no.)

- Manufactured by McNamara Boiler and Tank Co. Tulsa Oklahoma
(name and address)
- Manufactured for UNKNOWN
(name and address)
- Location of installation UNKNOWN ORRICK FARM SERVICE ORRICK MO 64077
(address)
- Date installed UNKNOWN
- Previously installed at UNKNOWN
- Manufacturer's Data Report attached No Yes
- Item registered with National Board No Yes, NB Number _____
- Item identification
 Type Horizontal 30,000 gal. NIT Storage Year built 1954
 Dimensions _____
 Mfg. serial no. H-898 Jurisdiction no. _____
J.B. 3/2/2014
 MAWP 250 J.B. 3/2/2014 Safety relief valve set at 200 psi
psi
- Complete the reverse side of this report with a true facsimile of the legible portion of the nameplate.
- If nameplate is lost or illegible, documentation shall be attached identifying the object to the Manufacturer's Data Report referenced on this form.

11. I request authorization to replace the stamped data and/or nameplate on the above described pressure-retaining item in accordance with the rules of the *National Board Inspection Code (NBIC)*.

Owner or User's name Buckler Tank Repair, LLC

Signature [Signature] Date 1-24-2014

Title Quality Control Manager

12. Authorization is granted to replace the stamped data or to replace the nameplate of the above described pressure-retaining item.

Signature [Signature] Date 1/29/2014
(chief inspector or authorized representative)

Jurisdiction State of Missouri

The following is a true facsimile of the legible portion of the item's nameplate. Please print. Where possible, also attach a rubbing of the nameplate.

Photo on File with
Buckler TANK Repair and
The NBIC.

I certify that to the best of my knowledge and belief, the statements in this report are correct, and that the replacement information, data, and identification numbers are correct and in accordance with provisions of the *National Board Inspection Code*. Attached is a facsimile or rubbing of the stamping or nameplate.

Name of Owner or User Buckler TANK Repair, LLC
Signature [Signature] Date 8/2/2017
Witnessed by Robert Willis Employer ARISE
Signature [Signature] Date 8/2/17 NB Commission NB12560

(Back)

BUCKLEN TANK CERTIFICATE

CERTIFICATE NO. 10000

MFG. DATE: 10/15/77

SERIAL NO: H-3000

TYPE: A6 CAP: 10000

WORKPRESS: 2500 TEMP: 1000

SHELL: 975 HEAD: 1000

O.D.: 100 SURF AREA

REPLACEMENT

NATIONAL BOARD:

NUMBERS: F-6556

FILE COPY

**myRMP Hazard Review
for
Program 2 Facilities With Anhydrous Ammonia
(40 CFR 68.50)**

In accordance with EPA regulations found in 40 CFR Part 68.50 a review of the hazards has been conducted and resulted in the following documentation. This Hazard Review was performed on 12-12-2013 by Gary Vandiver.

This Hazard Review was conducted for the following Facility:

Orrick Farm Service
208 EN Front St
Orrick, MO 64077

Regulated Substance: Anhydrous Ammonia

Process: storage and Handling

Maximum Inventory

Quantity of Tank(s)	Capacity (Gallons)	Factor	Pounds
1	30,000	x 4.6638 =	139,914
2	6,000	x 4.6638 =	55,965
1	12,000	x 4.6638 =	55,965
58	1,000	x 4.6638 =	270,500

Total maximum inventory onsite: **522,344** pounds



Safety Data Sheet(s)

Revision date for the Safety Data Sheet used for this Hazard Review: 9-1-2013

Safe Upper/Lower Limits

System Number 1: liquid Pump

Composition:	95.0 % Minimum	100.0 % Maximum
Pressure:	0.0 Psig Minimum	250.0 Psig Maximum
Temperature:	-20.0°F Minimum	120.0°F Maximum
Flow:	0.0 GPM Minimum	50.0 GPM Maximum

System Number 2: Compressor

Composition:	95.0 % Minimum	100.0 % Maximum
Pressure:	0.0Psig Minimum	250.0Psig Maximum
Temperature:	-20.0°F Minimum	120.0°F Maximum
Flow:	0.0GPM Minimum	50.0GPM Maximum

Equipment Specifications

Documentation used to confirm that the specifications of all equipment used to store or transfer ammonia is designed, constructed and approved for use with ammonia.

myRMP Mechanical Integrity and Maintenance Manual

Standards

The standard(s) used to design, build and maintain this installation are:

ANSI K61.1/CGA G-2.1 Standards



General Facility Considerations

Have written operating procedures been prepared specifically for this facility?.....Yes

Have all operators been trained on the written operating procedures required for this facility?Yes

Have the potential consequences of this facility being located in close proximity to the following been considered?

- School, college or universityYes
- Daycare or pre-schoolYes
- Hospital, clinic or medical facility.....N/A
- Industrial parkN/A
- Residential areaYes

Is this ammonia installation equipped with a remote-activated emergency shut-down system?Yes

Can the entire ammonia installation be shut down from:

- the bulkhead or receiving area?Yes
- the riser(s) used for nurse tanks?Yes
- the riser(s) used for railcars?Yes
- a strategically placed remote location such as an office, etc?Yes

Has the possibility and consequences of each of the following been considered for this facility?

- Flooding (Flash or Flood Plain).....Yes
- TornadoYes
- Earthquake.....Yes

Is the appropriate personal protective equipment available onsite and ready for use by operators performing handling, inspection, repair and maintenance duties?Yes

Is this installation protected from vandalism, sabotage or otherwise secured by a fenced perimeter?.....Yes

Is this ammonia installation protected from vandalism, sabotage or otherwise secured by security devices such as locks, etc?.....Yes

Is a 150 gallon "emergency jump tank" of clean water or an emergency safety shower always available to workers during transfer operations?Yes

Has this facility provided an emergency contact notification sign at the entrance to the facility?Yes

At any time or point is air introduced into equipment used for anhydrous ammonia?No



Storage Tank Considerations

Are any storage tanks located in close proximity to the following activities?

- Roadway, street or path with substantial trafficNo
- Movement of railcars of grain, fertilizer, etc.No
- Airport or air strip with planes landing/taking offNo
- Movement of a forklift, end loader or heavy equipment.....No
- Storage of nitrate (Ammonium, Potassium or Sodium)No
- Storage of flammable materials (Gasoline, Diesel or Propane)No
- Storage of combustible materials (Brush, Pallets, Tires, etc.).....No
- Storage of shop materials such as oxygen or acetylene gas.....No

Are all tanks protected from vehicular impact by barriers of sufficient design and construction?Yes

Are all tanks protected from being overfilled beyond the 85% safe level?Yes

Has the possibility and consequences been considered that the contents of a storage tank filled to 85% during cold weather will increase in pressure resulting in the tank being overfilled?Yes

Do all tanks have a legible ASME dataplate?Yes

Are all components utilized on tanks constructed of materials compatible with anhydrous ammonia?Yes

Are all tanks equipped with properly sized excess flow valves?Yes

Are all tanks equipped with positive shutoff globe valves?Yes

Are all tanks equipped with emergency shutoff valves?Yes

Are all tanks equipped with current pressure relief valves and weatherproof rain caps?.....Yes

Are all tanks protected from vibration/movement by use of flexible connectors, swing joint or other means?.....Yes

Are all flexible connectors stainless steel and double-braided?Yes

Is a fire extinguisher mounted and ready for use in the storage tank area?Yes

Are all tanks painted, labeled and maintained in good condition?Yes

Are all tanks inspected periodically to ensure the safe mechanical operating condition?Yes

Is the appropriate personal protective equipment available onsite and ready for use in the storage tank area?Yes

Have all operators involved with the storage tank process received training?Yes



Has the person with responsibility for the maintenance and repair of the storage tank process received training?Yes

Are all storage tanks shut down with valves closed and locked when not attended or in use?.....Yes

Are all tanks installed with at least 18 inches of clearance from the bottom of the tank to ground level?.....Yes

Are all tanks mounted on saddles of sufficient design and construction?Yes

Are all tanks free of unacceptable dents or gouges?.....Yes



Hazards Considered	Mitigative Action(s)	Deadline/Person Responsible
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Compressor Considerations

Has the person with responsibility for the maintenance and repair of compressors received training?Yes

Are all compressors inspected periodically to ensure the safe mechanical operating condition?Yes



Hazards Considered	Mitigative Action(s)	Deadline/Person Responsible
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Liquid Pump Considerations

Has the person with responsibility for the maintenance and repair of liquid pumps received training?Yes

Are all liquid pumps inspected periodically to ensure the safe mechanical operating condition?Yes

Are all liquid pumps used for ammonia equipped with a pressure-activated bypass?Yes

Are all pressure-activated bypass devices tested periodically?Yes



Piping, Hose & Fitting Considerations

Is there any piping located in close proximity to the following activities?

- Roadway, street or path with substantial trafficNo
- Movement of railcars of grain, fertilizer, etc.No
- Airport or air strip with planes landing/taking offNo
- Movement of a forklift, end loader or heavy equipmentNo
- Storage of nitrate (Ammonium, Potassium or Sodium)No
- Storage of flammable materials (Gas, Diesel or Propane)No
- Storage of combustible materials (Brush, Pallets, Tires, etc.)No
- Storage of shop materials such as oxygen or acetylene gasNo

Is all piping protected from vehicular impact by barriers of sufficient design and construction?Yes

Is underground piping utilized at this facility?No

Are all underground runs of piping tested annually for leaks?N/A

Are all valves and fittings free of leaks?Yes

Are all threaded/welded connections free of leaks?Yes

Are all fittings, piping and hose constructed of materials compatible with anhydrous ammonia?Yes

Is all piping painted and maintained in good condition?Yes

Are all liquid and vapor lines properly labeled or color-coded?Yes

Have the colors used to identify liquid and vapor lines been recorded in the written operating procedures?Yes

Is all piping utilized in the system of seamless construction?Yes

Are all pipe supports of sufficient design and construction?Yes

If Schedule 40 piping is utilized in the system are all connections welded?Yes

Are all hydrostatic relief valves rated 350-400 Psig so as not to exceed the installation's engineered design pressure?Yes

Are all flexible connectors stainless steel and double-braided?Yes

Are all flexible connectors 24 inches or less in length?Yes

Are all fittings, piping and hose inspected annually to ensure safe mechanical operating condition?Yes



Has the person with responsibility for the selection, repair and maintenance of piping, hose and fittings received training?.....Yes

Are any hoses utilized for ammonia service made onsite?.....Yes

Are all hoses made onsite for ammonia service tested annually to ensure satisfactory working pressure?.....N/A

Has the practice of making hoses onsite and the consequences of failure been reviewed?...N/A

Are all hoses with expiration dates within the current operating timeframe?Yes



Bulkhead Considerations

- Are all bulkheads designed and constructed to withstand the force exerted in the event of a pull-away?Yes
- Are all bulkheads equipped with devices designed to "shear" and protect the plumbing?Yes
- Are all bulkheads equipped with positive shutoff globe valves?Yes
- Are all bulkheads equipped with emergency shutoff valves?Yes
- Are all bulkheads equipped with back-check valves?Yes
- Are all bulkheads inspected periodically to ensure the safe mechanical operating condition?Yes
- Has the person with responsibility for the maintenance and repair of bulkheads received training?.....Yes
- Are chock blocks available and ready for use in the bulkhead/receiving area?.....Yes
- Are all incoming trucks checked to confirm the transfer hose provided is constructed of materials that are compatible and approved for use with anhydrous ammonia?Yes
- Are "STOP-Tank Car Connected" sign(s) available and ready for use in the railcar bulkhead/receiving area?.....Yes
- Is the appropriate personal protective equipment available onsite and ready for use in the bulkhead/receiving area?.....Yes
- Are all bulkheads equipped with a "bleed-off" tank of water for use in capturing liquid ammonia?Yes



Riser Considerations

- Are all operators involved with using risers to load out ammonia properly trained on the process?.....Yes
- Are all risers equipped with pull-away protection designed and constructed to withstand a pull-away event?.....Yes
- Is all pull-away protection equipment properly installed so as to facilitate the shearing or breakaway in a pull-away event?Yes
- Are all risers equipped with properly sized excess flow valves?Yes
- Are all risers equipped with positive shutoff globe valves?Yes
- Are all risers equipped with emergency shutoff valves?Yes
- Are all valves properly labeled or color-coded?.....Yes
- Are all risers protected from vehicular impact by barriers of sufficient design and construction?.....Yes
- Are all risers inspected periodically to ensure the safe mechanical operating condition?Yes
- Has the person with responsibility for the maintenance and repair of the risers received training?.....Yes
- Are chock blocks available and ready for use in the riser/loading area?Yes
- Is the appropriate personal protective equipment available onsite and ready for use in the bulkhead/receiving area?.....Yes
- Is a fire extinguisher mounted and ready for use in the riser/loadout area?.....Yes
- Are all risers equipped with a means to secure hose end valves and other connections when unattended?Yes



Nurse Tank/Wagon Considerations

Are any areas used to park nurse tanks located in close proximity to the following activities?

- Roadway, street or path with substantial trafficYes

Corrective Action Required - 1: keep area well lit and secure

Person Responsible: Gary

Complete by Date: January 15, 2014

- Movement of railcars of grain, fertilizer, etc.No
- Airport or air strip with planes landing/taking offNo
- Movement of a forklift, end loader or heavy equipment.....No
- Storage of nitrate (Ammonium, Potassium or Sodium)No
- Storage of flammable materials (Gasoline, Diesel or Propane)No
- Storage of combustable materials (Brush, Pallets, Tires, etc.).....No
- Storage of shop materials such as oxygen or acetylene gas.....No

Are all nurse tanks protected from being overfilled beyond the 85% safe level?.....Yes

Has the possibility and consequences been considered that the contents of nurse tanks filled to 85% during cold weather will increase in pressure resulting in the tank being overfilled?Yes

Do all nurse tanks have legible ASME dataplates?Yes

Have all nurse tanks with missing or illegible ASME dataplates passed the visual inspection, tank thickness and pressure test required by DOT to remain in service?Yes

Are all components utilized on nurse tanks constructed of materials compatible with anhydrous ammonia?.....Yes

Are all nurse tanks equipped with properly sized excess flow valves?Yes

Are all nurse tanks equipped with current liquid withdrawal valves?Yes

Are all nurse tanks equipped with current liquid fill valves?.....Yes

Are all nurse tanks equipped with current pressure relief valves and weatherproof rain caps?Yes

Are all nurse tanks equipped with current vapor return valves?.....Yes

Are all nurse tanks painted, marked and maintained in good condition?Yes

Are all nurse tanks inspected periodically to ensure the safe mechanical operating condition?Yes

Is the appropriate personal protective equipment available and ready for use with nurse tank operations?Yes



Are all nurse tanks equipped with a supply of clean emergency water?Yes

Have all operators involved with nurse tanks received training?Yes

Has the person with responsibility for the maintenance and repair of nurse tanks received training?Yes

Have all repairs involving welding on the pressure vessel been performed by a qualified "R-Stamp" welder?.....Yes

Are all nurse tanks secured when not attended or in use?Yes

Are all ACME valves hand tightened and inspected often to ensure a gasket is present and the assembly is free of leaks?Yes

Has the plumbing used to connect "double" or "triple" nurse tank configurations been plumbed according to best management practice to include properly sized excess flow valves?.....Yes

Are all nurse tanks free of unacceptable dents or gouges?Yes



Certification

I am knowledgeable of the covered process and have to the best of my knowledge, information and belief performed, after reasonable inquiry, this Hazard Review.

<u>Cary Vandiver</u> (Printed Name of Preparer)	<u>12-12-13</u> (Date)	(x) _____ (Signature of Preparer)
<u>Cary Vandiver</u> (Printed Name of Preparer)	_____ (Date)	(x) <u>Cary Vandiver</u> (Signature of Preparer)
_____ (Printed Name of Preparer)	_____ (Date)	(x) _____ (Signature of Preparer)



IN THE MATTER OF Orrick Farm Service, Inc., Respondent
Docket No. CAA-07-2015-0012

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:

hoard.christine@epa.gov

Copy by First Class Mail to:

Gary Vandiver, General Manager
Orrick Farm Service Inc.
208 East North Front Street
PO Box 79
Orrick, Missouri 64077

Dated: 5/18/15



Kathy Robinson
Kathy Robinson
Hearing Clerk, Region 7