



REGION 10

SEATTLE, WA 98101

Clean Air Act - Risk Management Program – Section 112(r)
Emergency Planning Community Right-to-Know Act – Sections 302, 311 and 312
On-site Compliance Inspection Report
Simplot Frozen Vegetables

PURPOSE

The purpose of this On-site Compliance Inspection was to determine compliance with the Clean Air Act Section 112(r)(7) Risk Management Program (40 C.F.R. Part 68) and the Emergency Planning and Community Right to Know Act Sections 302, 311 and 312.

CAA Section 112(r)(7) requires facilities that hold more than a threshold quantity of a regulated substance in a process to develop and implement a Risk Management Program. EPCRA Section 311 requires facilities that hold chemicals above reporting threshold to submit copies of the SDSs or a list of these chemicals to the State Emergency Response Commission, the Local Emergency Planning Committee and the local fire department. EPCRA Section 312 requires the Annual Chemical Inventory Reports (Tier II) for the current calendar year to be submitted by March 1 of the following year. The Tier II is required to be submitted to the SERC, LEPC and fire department. EPCRA Section 302 requires any facility that has any EHS above the threshold planning quantities to notify the SERC and LEPC. LEPCs should also include the EHS(s) in their emergency response plans. Facilities covered under EPCRA Section 312 are required to indicate on the Tier II if they are subject to EPCRA Section 302 emergency planning requirements.

COMPANY INFORMATION

Name: JR Simplot Company
Mailing Address: 1099 W Front Street
Boise, Idaho 83702
Website:

FACILITY INFORMATION

Name: Simplot Frozen Vegetables
Facility Address: 1825 N Commercial Ave
Pasco, Washington 99301
Latitude/Longitude: 46.245832999999998 / -119.056389
RMP Facility ID#: 100000198617
EPCRA Tier II ID#: WAH000055612
FRS ID#: 110029535135
EJ Concerns: Yes (>90%)

CONTACT INFORMATION (RMP Implementation)

Name: Tommy Guerra
Title: Unit Director
Phone Number: (208) 780-6833
E-mail: tommy.guerra@simplot.com

EMERGENCY CONTACT INFORMATION

Name: Efrain Valdez
Title: Unit Director
Phone Number: (208) 780-6833
E-mail: efrain.valdez@simplot.com

INSPECTION DETAILS

Inspection Date: 6/26/2024
Inspection Time: 9:00 AM to 1:45 PM
Inspectors: Peter Phillips, US EPA R10, SEE Grantee, Lead RMP/EPCRA Inspector
Terry Garcia, US EPA R10, SEE Grantee, RMP/EPCRA Inspector
Edward Johannes, US EPA R10, SEE Grantee, RMP/EPCRA Inspector
Ryan Bowsby, US EPA R10, RMP/EPCRA Inspector-in-Training

On June 12, 2024, EPA emailed a Notice of Inspection Letter to the facility informing them of a planned RMP and EPCRA inspection. The letter included 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. A copy of the letter must be provided to the employee representatives and the letter posted in a manner accessible to employees in the facility.

- Is the facility is unionized? Yes ☐ No ☒
- Was an employee representative present during the inspection? Yes ☐ No ☒

GENERAL INFORMATION

The Simplot Frozen Vegetables, LLC facility, is regulated under the Risk Management Program as a Program Level 3 facility. The facility processes, freezes, stores, and ships produce grown on area farms. The facility was purchased from CRF Frozen Foods Ltd. in 2018. Business is conducted daily, 7 days/week with 4 shifts working 12 hours/day. Peak production season is June through August. There are currently 470 full-time employees and eight (8) anhydrous ammonia operators and maintenance personnel.

The 300,000 square foot facility uses an ammonia refrigeration system, consisting of a single engine room, four (4) blast freezers tunnels, three (3) individually quick-frozen freezers (IQF), and one large common cold storage room. Two additional screw compressors were added to the process in 2018 to bring the total compressor count to eleven (11). There are three (3) anhydrous ammonia detectors in the engine room only. The detection levels are set at 25 ppm (yellow strobe), 50 ppm (orange strobe), and 150 ppm (red strobe and emergency ventilation activated). The anhydrous ammonia refrigeration system can only be shut down manually from the control room or e-stops located at the exterior engine room doors. Future updates are planned to have remote shutdown capabilities and the addition of anhydrous ammonia detectors throughout the facility. Safety Data Sheets (SDS) and

operating procedures are in the control room and the facility's internal network. The facility contracted Walker Engineering to perform a mechanical integrity inspection in 2024 and all identified issues have been addressed.

The refrigeration system contains 49,275 pounds of anhydrous ammonia, exceeding the RMP regulated threshold quantity of 10,000 pounds as reported in their RMP dated November 19, 2021.

DATE AND PROGRAM LEVELS OF SUBMITTED RMP

Initial Submission Date: 4/10/2007

Date of Latest Update: 11/19/2021

- Has the facility has been inspected in the past 5 years? Yes ☐ No ☒
- Is the facility High Risk? Yes ☒ No ☐

Process (as reported in the RMP):

Process ID	Description	Process Chemical ID	NAICS Code	Program Level	Chemical Name CAS Number	Quantity (lbs.)
1000120809	Ammonia Refrigeration	1000151151	311411	3	Ammonia, Anhydrous (7664-41-7)	49,275

CAA TITLE V AIR PERMIT

- Does the facility have a CAA Title V Permit? Yes ☐ No ☒

EMERGENCY RELEASE / ACCIDENT HISTORY

- Did an RMP reportable release occur in the past 5 years? Yes ☐ No ☒
- Did a CERCA/EPCRA reportable release occur in the past 5 years? Yes ☐ No ☒

If either yes, date and description of release:

EPCRA 312 – TIER II REPORT

- Was the 2024 Tier II report submitted to the SERC? Yes ☒ No ☐
If yes, date Tier II was submitted: 2/27/2024
- Was the 2024 Tier II submitted to the LEPC/fire department? Yes ☒ No ☐
If yes, date Tier II was submitted: 2/29/2024
- Is the facility subject to EPCRA Section 302? Yes ☒ No ☐
If yes, is it correctly checked on the Tier II? Yes ☒ No ☐
- Is the subject to RMP correctly checked on the Tier II? Yes ☒ No ☐
- Is RMP facility ID correct on the Tier II? Yes ☒ No ☐

EPCRA CHEMICALS OVER THRESHOLD

According to the most recent Tier II, the facility stores the following hazardous chemicals over the reporting threshold. See the attached Tier II, Attachment B, for inventory amounts.

Chemical Name	EHS (Yes or No)	CAS Number
Anhydrous Ammonia	Yes	7664-41-7
Sulfuric Acid	Yes	7664-93-9

EPCRA 311 – SDSs

See photo 18 for SDSs and chemical information on each EHS stored over the reporting threshold at the facility.

EPCRA 302 – LEPC Coordination

The facility is a member of the Benton County LEPC.

LEPC

Agency: Benton County Emergency Planning Committee
Program Contact: Ms. Deanna Davis
Title: Benton County Emergency Management
Address: 651 Truman Avenue
Richland, Washington
Phone Number: 509-628-2600
Email: d.davis@bces.wa.gov
Website: <https://www.bces.wa.gov/Home/Components/Calendar/Event/23272/1488>

INSPECTION ENTRY

Peter Phillips led the inspection at the Simplot Frozen Vegetable LLC facility. The inspection team met with Mr. Tyler Johnson, Plant Director; Mr. Jose Gonzales, Plant Engineer; and Mr. Ulices Cisneros, Maintenance Manager. Additionally, the team was introduced to the following personnel:

Name	Title
Andy Erickson	Environmental Manager
John Smith	Safety Manager
Monica Morales	Sanitation Manager
Lorenzo Juarez	Boiler and Refrigeration Supervisor
Gary Weimer	PSM Coordinator
Brent Kroohte	IT Specialist
Jordan Hanes	Franklin County Emergency Services

Upon arrival, the inspection team signed in at the front office and were escorted to a conference room above the facility's office area. Peter Phillips conducted the introductions and provided a summary of the Risk Management Program (RMP), explaining the purpose of the visit. Each team member presented their credentials.

The EPA requested an overview of the facility's operations and any additional safety measures for the site tour. Mr. Johnson described the facility and its operations, noting that the required personal protective equipment (PPE) included hard hats, safety glasses, ear plugs, hair/beard nets, and high-visibility vests.

- Were any SERC, LEPC or fire department representative present? Yes ☒ No ☐
If yes, names and titles of representatives: Jordan Hanes
Jordan Hanes, Franklin County Emergency Services
- Is the facility a first responder? Yes ☐ No ☒
If no, responding agency: Pasco Fire Department

FACILITY TOUR / ON-SITE OBSERVATIONS

The facility tour was conducted from approximately 9:58 A.M. to 11:15 A.M. The inspection team was escorted by Mr. Gonzales, Mr. Hanes, Mr. Smith, and Mr. Hanes. The inspection team observed areas of the facility's major anhydrous ammonia refrigeration components consisting of two blast freezers, a crust freezer, an engine room, control room, and one common freezer storage room.

In the Tote Room two blast freezers were observed (Photo 2). A crust freezer and emergency shower/eyewash station were observed (Photos 5 and 6). An emergency shower/eyewash station was observed in the roasting area (Photo 4). The Packaging and Palletizing Room has four evaporators (Photos 8, 9, and 10), two ammonia detectors (Photo 10), emergency shower/eyewash station (Photo 12), and an emergency alarm strobe (Photo 11). The forklift charging station (Photo 15) and emergency shower/eyewash station (Photo 12) were observed in the forklift charging area. The single freezer room containing three evaporators and three ammonia detectors were observed (Photo 13). Piping was labeled and no corrosion was observed on refrigeration equipment.

In the Utility Alley two condensers were observed on the rooftop structure on the way to the engine room (Photo 16). Hazard placarding for anhydrous ammonia and authorized employee access sign were visible on the secure engine room entrance door (Photo 26). Ammonia alarm blue strobe and emergency ventilation control were located near the engine room entrance door (Photos 23 and 26). In the engine room the ammonia piping was labeled (some labels were covered by piping support) and the low-pressure vapor ammonia piping was insulated (yellow color) (Photo 24). A small section of damaged yellow insulation cover was observed on a low pressure vapor ammonia return line (Photo 39). The high-pressure receiver (HPR) is located outside of the engine room under a roof cover (Photo 40). In the engine room there are three low pressure receivers (LPR) (Photos 29, 31 and 32), a sub-cooler (Photo 30), and eleven (11) screw compressors (Photo 37). Two new compressors were installed in 2018 when Simplot purchased the facility (Photo 36). The engine room interior door has an emergency push bar. The pressure relief valves (PRV) in the engine room have replacement dates of 12/2025. Two emergency shower/eyewash stations were observed in the engine room (Photos 25 and 33). An ammonia detection system control panel is used for three (3) ammonia detectors in the engine room (Photo 28). The engine room ventilation system has two air intake louvered vents, three horizontal exhaust fans and a ceiling exhaust vent (Photos 34, 35 and 38). The HPR and LPR had ASME name plates (Photos 29 and 30) and the King Valve was identified. In the refrigeration system control room, the operating procedures (SOPs), SDS sheets (Photo 18), computer display monitoring and control panels (Photos 19, 20 and 21), the freezer tunnel remote control panels and emergency shutdown buttons (Photo 27), and a set of P&IDs (Photo 22) were observed.

Photographs were taken of the covered process areas. The photographs are included in Attachment A.

After touring the RMP-covered process areas and the EPCRA chemical storage areas, the inspection team returned to the conference room to review the RMP documentation. Mr. Hanes exited the inspection team after the facility tour. Upon completion of the document review, EPA provided a debriefing to the remaining facility staff.

INFORMATION COLLECTED FROM FACILITY

1. Simplot plot plan
2. Process flow diagram
3. Facility evacuation plan
4. Operator training form

AREAS OF CONCERNS

The following is a list of areas of concern identified.

1. **Process Hazard Analysis** – Simplot Frozen Vegetables has not updated and revalidated their PHA at least every five years after the completion of the initial PHA to assure that the PHA is consistent with the current process. [68.67(f)]. There was a 6-year gap between their 2007 and 2013 PHA.
2. **Emergency Response** – As of September 21, 2018, Simplot Frozen Vegetables has not performed the annual emergency response coordination activities required under §68.93. [68.90(b)(4)]. Simplot Frozen Vegetables was unable to provide annual emergency coordination documentation for 2018 to 2023.
3. **Emergency Response** – Simplot Frozen Vegetables has not annually coordinated with local emergency planning and response organizations to determine how the stationary source is addressed in the community emergency response plan and to ensure that local response organizations are aware of the regulated substances at the stationary source, their quantities, the risks presented by covered processes, and the resources and capabilities at the stationary source to respond to an accidental release of a regulated substance. [68.93]. Simplot Frozen Vegetables was unable to provide annual emergency coordination documentation for 2018 to 2023.

FOLLOW-UP DOCUMENTS REQUESTED

No follow-up documents were requested during the inspection.

ON-SITE INSPECTION REPORT CERTIFICATION

This is to certify that I, Peter Phillips, as the lead inspector for the On-site Compliance Inspection and that I have verified the accuracy of the information in this report.

PETER PHILLIPS (Affiliate) Digitally signed by PETER PHILLIPS (Affiliate)
Date: 2025.01.07 12:29:33 -08'00'

Inspector Signature

JAVIER MORALES Digitally signed by JAVIER MORALES
Date: 2025.01.07 13:13:12 -08'00'

RMP Coordinator Signature

ERIN WILLIAMS Digitally signed by ERIN WILLIAMS
Date: 2025.01.08 14:05:35 -08'00'

EPCRA Coordinator Signature

**MATTHEW
QUARTERMAN** Digitally signed by MATTHEW
QUARTERMAN
Date: 2025.01.10 09:09:28 -08'00'

Land Enforcement Section Chief Signature

ATTACHMENTS

- A. Photo log and Photographs
- B. 2024 Tier II report

Attachment A – Photo Log

Site Name: Simplot Frozen Vegetables LLC

City, State: Pasco, WA

Photographer: Ryan Bowlsby

File	Photo	Date	Time	Description
Simplot_00001.JPG	1	6/26/2024	9:58 AM	Process block flow diagram
Simplot_00002.JPG	2	6/26/2024	10:07 AM	Blast freezers in Tote Room
Simplot_00003.JPG	3	6/26/2024	10:08 AM	Product Exiting Tunnel 3
Simplot_00004.JPG	4	6/26/2024	10:10 AM	Emergency shower/eyewash station in roasting area
Simplot_00005.JPG	5	6/26/2024	10:12 AM	Crust freezer area
Simplot_00006.JPG	6	6/26/2024	10:15 AM	Emergency shower/eyewash station in crust freezer area
Simplot_00007.JPG	7	6/26/2024	10:17 AM	Product exiting browning oven on conveyer belt
Simplot_00008.JPG	8	6/26/2024	10:20 AM	Evaporator in Palletizing Room
Simplot_00009.JPG	9	6/26/2024	10:22 AM	Evaporator in Packaging Room
Simplot_00010.JPG	10	6/26/2024	10:24 AM	Ammonia detector in Packaging Room
Simplot_00011.JPG	11	6/26/2024	10:25 AM	Emergency alarm strobe in Packaging Room
Simplot_00012.JPG	12	6/26/2024	10:27 AM	Emergency shower/eyewash station in Forklift Charging Area
Simplot_00013.JPG	13	6/26/2024	10:30 AM	Evaporator and ammonia detector in common cold storage room freezer
Simplot_00014.JPG	14	6/26/2024	10:31 AM	Emergency ammonia alarm strobe in loading dock area
Simplot_00015.JPG	15	6/26/2024	10:31 AM	Lithium battery (forklift) charging area
Simplot_00016.JPG	16	6/26/2024	10:36 AM	Condensers on rooftop structure in the Utility Alley
Simplot_00017.JPG	17	6/26/2024	10:38 AM	Emergency shower/eyewash station in Raw Processing Area
Simplot_00018.JPG	18	6/26/2024	10:44 AM	Control room - SOP and SDS storage
Simplot_00019.JPG	19	6/26/2024	10:45 AM	Control room - ammonia refrigeration monitoring screen 1 of 3
Simplot_00020.JPG	20	6/26/2024	10:46 AM	Control room - ammonia refrigeration monitoring screen 2 of 3
Simplot_00021.JPG	21	6/26/2024	10:46 AM	Control room - ammonia refrigeration monitoring screen 3 of 3
Simplot_00022.JPG	22	6/26/2024	10:47 AM	Control room - piping and instrument diagram (P&ID) on file
Simplot_00023.JPG	23	6/26/2024	10:48 AM	Ammonia alarm blue strobe
Simplot_00024.JPG	24	6/26/2024	10:48 AM	Labeled ammonia piping in engine room
Simplot_00025.JPG	25	6/26/2024	10:49 AM	Emergency shower/eyewash station
Simplot_00026.JPG	26	6/26/2024	10:50 AM	Engine room entrance door and emergency ventilation control left of door, ammonia alarm blue strobe, and MCC Door 2 entrance
Simplot_00027.JPG	27	6/26/2024	10:51 AM	Freezer tunnel #1, #2, and #3 remote control panels and emergency shutdown buttons
Simplot_00028.JPG	28	6/26/2024	10:52 AM	Ammonia detection system control panel and alarm blue strobe
Simplot_00029.JPG	29	6/26/2024	10:50 AM	Low pressure receiver (LPR) #3 in engine room
Simplot_00030.JPG	30	6/26/2024	10:51 AM	Sub-cooler in engine room
Simplot_00031.JPG	31	6/26/2024	10:52 AM	Low pressure receivers (LPR) #1 and #2 in engine room
Simplot_00032.JPG	32	6/26/2024	10:53 AM	Low pressure receiver (LPR) #2 in engine room
Simplot_00033.JPG	33	6/26/2024	10:55 AM	Emergency shower/eyewash station in LPR area
Simplot_00034.JPG	34	6/26/2024	10:57 AM	Three horizontal exhaust Fans in engine room LPR area
Simplot_00035.JPG	35	6/26/2024	10:58 AM	Ceiling exhaust vent in engine room LPR area
Simplot_00036.JPG	36	6/26/2024	10:59 AM	Two compressors installed in 2018 in engine room
Simplot_00037.JPG	37	6/26/2024	11:00 AM	Compressors in engine room
Simplot_00038.JPG	38	6/26/2024	11:01 AM	Air intake louvered vents in engine room
Simplot_00039.JPG	39	6/26/2024	11:02 AM	Damaged yellow insulation cover on a low pressure vapor ammonia return line in engine room
Simplot_00040.JPG	40	6/26/2024	11:05 AM	High pressure receiver (HPR) located outside engine room under roof cover
Simplot_00041.JPG	41	6/26/2024	11:06 AM	Engine room entrance door and ammonia alarm blue strobe
Simplot_00042.JPG	42	6/26/2024	11:07 AM	Emergency ammonia pressure control box unlocked outside engine room