CLEAN AIR ACT (CAA) § 112(r)(1) AND EMERGENCY PLANNING, COMMUNITY RIGHT-TO-KNOW ACT (EPCRA) § 312 INSPECTION REPORT

Pitman Farms Salina Processing Plant
Salina, Utah

Facility Name and Address: Pitman Farms – Salina Processing Plant 160 South 500 West Salina, Utah 84654 **Contact/Telephone:** Luke Freeman, Technical Services Director (435) 436-8211 x 13028 **Mailing Address:** Pitman Farms, Utah Division Box 308 350 South 300 West Moroni, Utah 84646	**Date of Inspection:** 9/14/2023 **RMP EPA ID #:** NA **TRIFID #:** NA **NAICS:** 311615 Poultry Processing **# Employees at this location:** 52

INTRODUCTION

This report presents the observations of the CAA section 112(r)(1) and EPCRA section 312 inspection conducted by the Environmental Protection Agency Region 8. The purpose of this inspection was to determine compliance with the General Duty Clause (GDC) requirements of CAA section 112(r)(1), and the Tier II reporting requirements of EPCRA section 312. The Facility produces, processes, handles, or stores anhydrous ammonia which is a regulated substance covered by the General Duty Clause as specified in the CAA § 112(r)(1).

The facility was previously inspected on 9/27/2017 when it was owned by Norbest LLC. At that time, the facility had a Risk Management Plan (RMP) under CAA section 112(r)(7). The final report for the 9/27/2017 inspection listed numerous potential deficiencies in the facility's implementation of the RMP and Tier II requirements.

On 5/6/2019, the EPA Region 8 office mailed a copy of the Norbest Salina Processing Plant inspection report and a Notice of Potential Violation of the CAA 112(r)(7) to the facility address by certified mail. On 5/22/2019, in response to the Notice of Potential Violation, Pitman Farms Inc. informed the EPA that they purchased the assets of Norbest LLC on 1/1/2018 including the Salina Processing Plant. Additionally, Pitman Farms conducted a review of the Salina Processing Plant refrigeration system shortly after the purchase. The review found the maximum quantity of anhydrous ammonia was below the required RMP threshold. Pitman Farms de-registered the RMP in February 2018.

On 12/19/2019, the EPA Region 8 office mailed a CAA 112(r) GDC advisory letter to the Pitman Farms Utah Division in Moroni, Utah. The purpose of this letter was to inform Pitman

Farms that the requirements for GDC and EPCRA apply to the Salina Processing Plant, and that the EPA intended to conduct another inspection at the facility. The EPA also noted that the 9/27/2017 inspection report provided to the facility would enable Pitman Farms to take any corrective action as needed.

Nature of Business: The Pitman Farms Salina Processing Plant (PFSPP) is a poultry processing plant that receives raw meat for further processing and packaging. Approximately 10% of the meat leaves the plant raw, the rest is cooked prior to packaging and distribution. Anhydrous ammonia is used in the refrigeration system at the facility.

The CAA section 112(r)(1) General Duty Clause states:
"It shall be the objective of the regulations and programs authorized under this subsection to prevent the accidental release and to minimize the consequences of any such release of any substance listed pursuant to paragraph (3) or any other extremely hazardous substance. The owners and operators of stationary sources producing, processing, handling or storing such substances have a general duty, in the same manner and to the same extent as section 654, title 29 of the United States Code [the general duty clause in the Occupational Safety and Health Act], to identify hazards which may result from such releases using appropriate hazard assessment techniques, to design and maintain a safe facility taking such steps as are necessary to prevent releases, and to minimize the consequences of accidental releases which do occur."

OBSERVATIONS

CAA § 112(r)(1) (GDC):

Section 1. Identify hazards which may result from such releases using appropriate hazard assessment techniques.

1. **Pitman Farms Inc. did not identify hazards using appropriate hazard assessment techniques for the Salina Processing Plant after the facility was purchased on 1/1/2018.**
2. **PFSPP provided documents for a Hazard Evaluation Study (Process Hazard Analysis or PHA) conducted 10/5 – 10/19/2017, prior to Pitman Farms Inc. purchase of the facility. This study used the HAZOP technique. Various nodes were used to evaluate the hazards associated with the ammonia refrigeration system. Recommendations were developed to eliminate or mitigate the causes and consequences of a potential ammonia release. These recommendations were summarized in the "Findings" tab of the PHA. The "Summary Intro" tab of the PHA indicates all recommendations should be evaluated and marked for completion.**
    a. **This PHA was conducted almost 6 years prior to the 9/14/2023 inspection. At the time of this EPA inspection, 9 of these recommendations had not been completed, but were marked "Under Review" of "Under Consideration":**
        i. **Consider Emergency shut down of the refrigeration system**

located outside for HAZMAT team responders.

ii. **Replace link on computer and have it accessible by all, possibly having a continuous isolated display. (Stationary Ammonia Detection System)**
iii. **Physically restrict access to Engine Room by doors and locks.**
iv. **Complete perimeter fencing.**
v. **Consider moving Ice machine piping to stubbed in locating (sic) on the roof.**
vi. **Consider not missing any year for joint training with Emergency Responders, because volunteers change.**
vii. **Initiate oil analysis monitoring program for Compressors.**
viii. **Recommend noninvasive testing schedule of vessels and piping.**
ix. **Consider more IM-1 guarding.**

The *Guidance for Implementation of the General Duty Clause Clean Air Act Section 112(r)(1), EPA 550-800-002, May 2000* discusses the types of information that should be included in a sufficient hazard assessment.

Section 2. Design a safe facility taking such steps as are necessary to prevent releases.

All observations regarding the safe design of PFSPP are being compared to *ANSI/IIAR Standard 9-2020 American National Standard for Minimum System Safety Requirements for Existing Closed-Circuit Ammonia Refrigeration Systems.* IIAR Standard 9-2020 is a current industry standard being followed by PFSPP.

3. **The machinery room doors are not self-closing, tight-fitting and are not equipped with panic hardware.**
    a. **The doors do not comply with IIAR 9-2020 Section 7.3.9.2.**
    b. **This was also a deficiency listed in the 2017 EPA inspection report for the Salina Processing Plant.**
    c. **The PFSPP representative provided an emailed update to the inspector on 11/2/2023. The facility is in the process of obtaining and installing new doors and hardware.**

4. **There is no emergency shut-off switch with a tamper-resistant cover located outside the principal machinery room door.**
    a. **This does not comply with IIAR 9-2020 Section 7.3.11.1.**
    b. **This was also a deficiency listed in the 2017 EPA inspection report for the Salina Processing Plant.**

5. **The rated airflow of the ventilation system installed in the West and East Machinery rooms is unknown, so it is unknown whether it complies with the codes and standards adopted at the time of installation. The ventilation system is not automatically activated by ammonia leak detention. The ventilation system does not provide monitored notification of a loss of power or failure of the**

emergency ventilation system.

- **a. This does not comply with IIAR 9-2020 Sections 7.3.13.1, 7.3.13.2, and 7.3.13.3.**
- **b. There were similar deficiencies for the ventilation system listed in the 2017 EPA inspection report for the Salina Processing Plant.**

6. **There are no directions for the emergency shutdown of the system in a location readily accessible to trained refrigeration staff and emergency responders. Required information includes:**
   - **a. Instructions with details and steps for shutting down the system in an emergency.**
   - **b. The name and telephone numbers of the refrigeration operating and maintenance staff.**
   - **c. The names and telephone numbers of all local, state, and federal agencies to be contacted as required in the event of a reportable incident.**
   - **d. Quantity of ammonia in the system**
   - **e. Signage shall include emergency facility contact title and phone number to call in the event of an alarm or ammonia release.**

   This does not comply with IIAR 9-2020 Section 7.2.10.

7. **At the time of this inspection, an emergency eyewash and safety shower was being installed in the previous restroom located behind the LSST-1 Accumulator. The door of the previous restroom was removed, but the rest of the outer wooden structure remains. The toilet was removed, and the emergency eyewash was hooked up to the cold water from the previous toilet plumbing. PFSPP has a water heater under the sink that will be hooked up to the emergency eyewash to provide tepid water. Currently, this emergency eyewash does not comply with ANSI/ISEA Z358.1 because it does not deliver tepid water.**
   - **a. This does not comply with IIAR 9-2020 Section 7.3.7.3**
   - **b. There was a deficiency in the 2017 EPA inspection report for the Salina Processing Plant for the lack of any emergency eyewash/safety shower units in the two Machinery rooms. Since then, a second emergency eyewash/safety shower was installed in the East Machinery room.**

8. **The facility's ammonia detection system was not operating properly and does not provide the following functions according to the requirements of IIAR 9-2020 Section 7.3.12:**
   - **a. Activate an alarm that responds to a monitored location.**
   - **b. Provide audible and visual alarms.**
   - **c. Activate emergency ventilation.**
   - **d. Automatically shut down the refrigeration compressors, pumps, and normally automatic valves that are not part of the emergency control system.**

The PFSPP representative provided an emailed update to the inspector on 11/2/2023. They brought a local representative onsite who determined the gas detection requirements for the facility. Installation of the ammonia detection system is in process but not fully installed or implemented yet.

9. **The termination of the pressure relief piping venting to the atmosphere on the roof of the facility is below the minimum height allowed in IIAR 9-2020 Sections 7.4.2.1, 7.4.2.2, and 7.4.2.3.**
    a. **This was also a deficiency listed in the 2017 EPA inspection report for the Salina Processing Plant.**
    b. **The PFSPP representative provided an emailed update to the inspector on 11/2/2023. The facility brought in their refrigeration contractor and corrected the heights for all pressure relief terminations on the roof. This work was completed on 11/2/2023 and photos were provided showing the results.**

10. **The air-cooling evaporators in the Holding Freezer do not have labels indicating the name or identifier. This does not comply with IIAR 9-2020 Section 7.2.9.2.**

11. **Not all ammonia piping such as piping mains, headers, and branches are labelled. Examples of unlabeled piping observed during the inspection include the HSD piping in the East Machinery Room, Blast Freezer piping, Oven Blast Freezer piping, S. Red Room Cooler piping, PP Cooler piping, Holding Freezer piping, and rooftop piping on the south end of the roof.**
    a. **This does not comply with IIAR 9-2020 Section 7.2.7.4.**
    b. **This was also a deficiency listed in the 2017 EPA inspection report for the Salina Processing Plant.**

12. **The PFSPP ammonia refrigeration system has two high-pressure receivers, HPR-1, and HPR-2. HPR-2 is located close to the wall. This prohibits determining if there is a nameplate on the back of this pressure vessel. PFSPP also was unable to provide the Form U1-A Manufacturer's Data Report for Pressure Vessels for the high-pressure receivers.**
    a. **This does not comply with *ANSI/ASHRAE Standard 15-2004 Safety Standard for Refrigeration Systems, Section 9.3 Refrigerant-Containing Pressure Vessels.* This is an industry design standard this facility follows for the original equipment.**
    b. **A compliance audit based on IIAR 9-2020 was conducted by PFSPP's process safety consultant. The consultant's audit report was completed on 8/24/2023. The report included observations that HPR-2 is equipped with a linear sight glass as the liquid level indicator and there is an improper support for this sight glass welded to the vessel. The report recommends replacing HPR-2.**

Section 3. Maintain a safe facility taking such steps as are necessary to prevent releases.

The *Guidance for Implementation of the General Duty Clause Clean Air Act Section 112(r)(1), EPA 550-800-002, May 2000* states, "An aspect of maintaining a safe facility is a review of information developed to ensure the safe operation of the facility. The Regional inspector should request and review standard operating procedures, evaluate the existence and implementation of employee training programs, review managing change procedures and evaluate the effectiveness of a facility's incident investigation program."

"The owners and operators should ensure that a preventive maintenance program is implemented that maintains the mechanical integrity of the process equipment and the safety mechanisms. This program should, at a minimum, meet guidelines from standard industry sources such as the American Petroleum Institute (API), American Society of Mechanical Engineers (ASME), National Association of Corrosion Engineers (NACE), American National Standards Institute (ANSI), and the American Institute of Chemical Engineers (AIChE). At a minimum, the maintenance program should include schedules for replacement, repairs, or regular maintenance (cleaning, lubrication, other) to the equipment, quality requirements for spare parts, installation and repair procedures, testing, quality controls, replacement in kind controls, and maintenance enforcement procedures. Reasonably detailed maintenance records should be kept for periodic maintenance program evaluation."

13. **The facility provided a list of standard operating procedures (SOPs) in response to the Notice of Inspection (NOI) and Request for Information letter sent by the EPA Region 8 office prior to the inspection. After the inspection, the inspector requested copies of these SOPs for review:**
    a. **Compressor C-3, reviewed/certified 12/8/2017;**
    b. **Oil Draining, reviewed/certified 1/1/2018;**
    c. **Receiver HPR-1, reviewed/certified 11/17/2017;**
    d. **Receiver HPR-2, reviewed/certified 11/17/2017;**
    e. **Accumulator RSOP HSST-1, reviewed/certified 11/29/2017;**
    f. **Accumulator LSST-1, reviewed/certified 12/8/2017;**
    g. **System Charge, reviewed/certified 11/17/2017;**
    h. **Complete system start-up following an emergency shut-down or power outage, reviewed 10/12/2016; and**
    i. **System Pump Down, reviewed/certified 10/12/16.**

- **None of these procedures have been reviewed or updated since Pitman Farms, Inc. purchased the facility in January 2018. The following SOPs need updates due to changes to process equipment, obsolete references to the ammonia supplier, Hills Brothers, that is not the current supplier used by the facility, or missing operating phases:**
    - **Oil Draining – all valves are now self-closing, missing emergency shut-down, and start-up after an emergency shutdown.**
    - **HPR-1 and HPR-2 – references to the ammonia supplier.**

- **HSST-1 – there is now a high-level alarm for this accumulator.**
- **System Charge – reference to the ammonia supplier, no emergency shut-down, no consequences of deviations and steps to correct them.**

Industry Standards currently employed by PFSPP include *ANSI/IIAR Standard 7-2019 American National Standard for Developing Operating Procedures for Close-Circuit Ammonia Refrigeration Systems.* PFSPP may want to review and update their SOPs based on IIAR Standard 7-2019.
The *Guidance for Implementation of the General Duty Clause Clean Air Act Section 112(r)(1), May 2000 discusses elements that should be included in SOPs.*

14. **The facility could only provide documentation that annual inspections of the ammonia piping inside the East & West Engine Rooms were conducted for 2019, 2020, 2021, and 2022. Annual inspections for the ammonia piping in the main process area, coolers, freezers, and on the roof were not conducted. Corrosion on uninsulated piping and compromised piping insulation were observed during the inspection in these locations:**
    a. **Insulated piping coming from the blast freezer to the roof;**
    b. **Uninsulated piping in the Blast Freezer; and**
    c. **Uninsulated piping (hot gas) next to the evaporators in the N. Red Room Cooler**

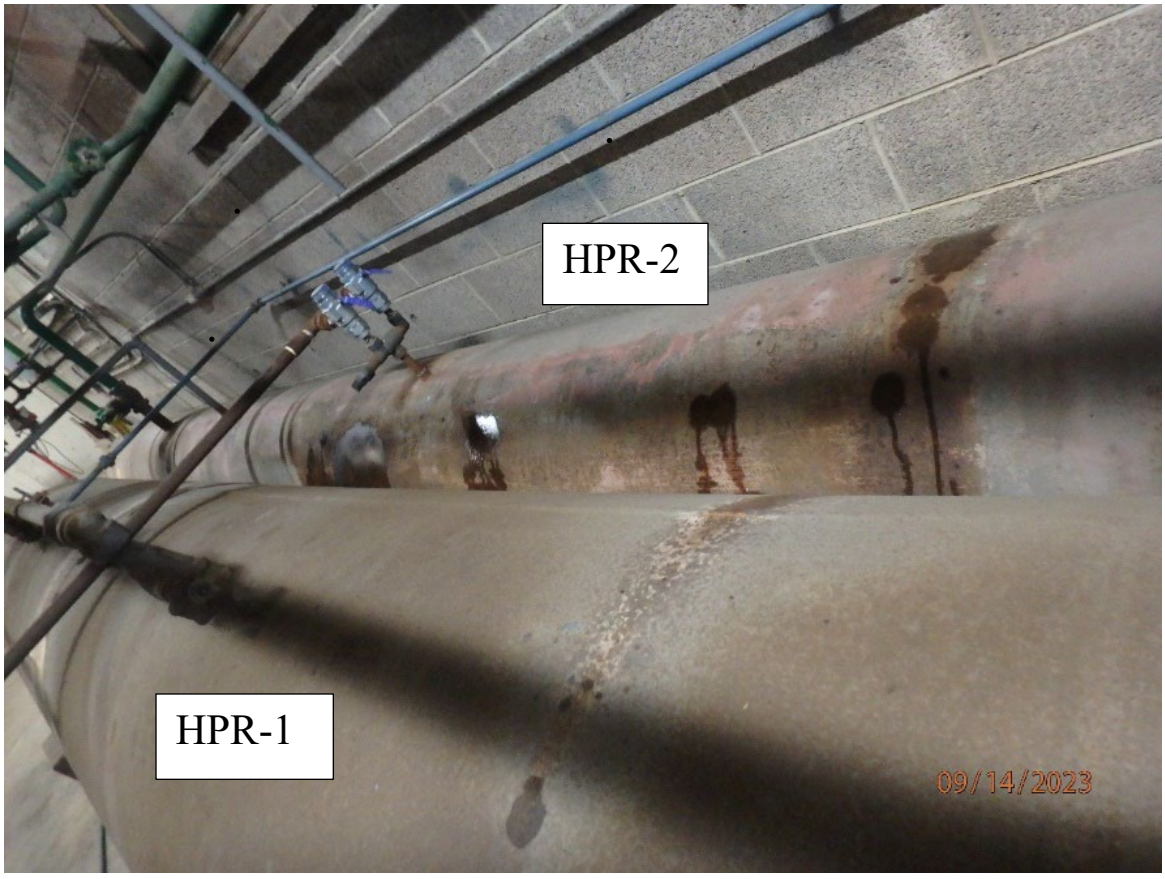
    Applicable industry standards such as *ANSI/IIAR 6-2019 Standard for Inspection, Testing, and Maintenance of Closed-Circuit Ammonia Refrigeration Systems* requires annual inspections of all ammonia refrigeration piping. This industry standard is currently employed by PFSPP.

15. **The emergency eyewash and safety showers do not receive annual tests for such things as required flow rates and temperatures of the water. The complete annual testing requirements that the facility should be conducting for emergency eyewash and safety showers are listed in their Master ITM Matrix and Schedule (ANSI/IIAR 6-2019). This document was provided in response to the NOI and Request for Information letter sent by the EPA Region 8 office prior to the inspection.**

    ANSI/IIAR 6-2019 Standard for Inspection, Testing, and Maintenance of Closed-Circuit Ammonia Refrigeration Systems is an industry standard currently employed by PFSPP.

16. **Copies of the annual inspections for the High-Pressure Receivers (HPR-1 and HPR-2) were requested for 2021, 2022, and 2023. The 3 annual checklists for HPR-2 indicates the nameplate is not legible and complete. The 2021-2023 annual checklists for both high-pressure receivers indicate "slight visible corrosion" even though the receivers have not had any protective coating (i.e. paint) applied since the 2017 inspection and corrosion was observed.**

Photo 1. HPR-1 and HPR-2 corrosion



17. The facility provided checklists for the annual inspections for the reciprocating compressors for 2021 only. The facility did not provide annual inspection checklists for 2022 and 2023 as requested. This would indicate these inspections were not conducted.

Applicable industry standards such as *ANSI/IIAR 6-2019 Standard for Inspection, Testing, and Maintenance of Closed-Circuit Ammonia Refrigeration Systems* requires annual inspections of all ammonia refrigeration compressors. This industry standard is currently employed by PFSPP.

18. The facility provided checklists for the annual inspections for pressure vessels UV-697 (CV-6) and UV-691 (CV-3) for 2021, 2022, and 2023. All checklists had "no visible corrosion" checked for item j. Vessel condition. The 2023 inspections for these pressure vessels were conducted on 8/24/2023, which was 3 weeks prior to this EPA inspection. Visible corrosion of these pressure vessels was observed during the 9/14/2023 inspection. (See Photos 2 and 3.)

Photo 2. UV-697 visible corrosion

Photo 3. UV-691 visible corrosion

Section 4. Minimize the consequences of accidental releases which do occur.

19. The facility provided an Emergency Response Plan (ERP) for the Salina Processing Plant in response to the NOI and Request for Information letter sent by the EPA Region 8 office prior to the inspection. This ERP was modified on 4/11/2023 and reviewed immediately prior to the inspection on 8/23/2023. The section on PPE and Emergency Equipment was marked "currently under review". During the opening conference, facility representatives provided additional information:

- **a. The SCBAs are out of service and not used.**
- **b. The Salina Fire Department has not been to the facility in the last 5 years.**
- **c. There has not been any drills or exercises conducted within the last 5 years.**

The facility should coordinate with the LEPC, local response organizations, and local hospitals by providing them a copy of the ERP and including them in any exercises designed to test and evaluate the ERP.

The *Guidance for Implementation of the General Duty Clause Clean Air Act Section 112(r)(1), EPA 550-800-002, May 2000* provides information on developing an emergency response plan to include planning, coordination with local officials, training, and exercises.

20. During the site tour of the facility, the inspector observed the closest emergency eyewash and safety shower to the sanitizing chemicals storage room was in a location that would require more than 10 seconds to reach and did not have a clear path from where the chemicals are stored. Metal frames and wooden pallets were blocking access to the emergency eyewash and safety shower. From the sanitizing chemicals location, a person must travel down 5 steps, through a gate, and up a ramp to reach the emergency eyewash and safety shower.

Applicable industry standards such as *ANSI/ISEA Z358.1-2014 American National Standard for Emergency Eyewash and Shower Equipment* requires an eyewash/safety shower be in a location that requires no more than 10 seconds to reach, and the path of travel shall be free of obstructions.

EPCRA § 312:

1. Requirement found at Part 370 – Hazardous Chemical Reporting: Community Right-To-Know - Subpart B – What hazardous chemicals must I report under this part? [40 CFR 370.12]:
(a) You must report any hazardous chemical for which you are required to prepare or have available an MSDS (or SDS) under OSHA HCS that is present at your facility equal to or above the applicable threshold specified in § 370.10. (Specific exemptions from reporting are in § 370.13.)
(b) The EPA has not issued a list of hazardous chemicals subject to reporting

under this part. A substance is a hazardous chemical if it is required to have an MSDS (or SDS) and meets the definition of hazardous chemical under the OSHA regulations found at 29 CFR 1910.1200(c).

- *PFSPP did not report sulfuric acid on the Tier II report for calendar years 2020, 2021, and 2022. PFSPP utilizes forklift batteries which contain sulfuric acid, an Extremely Hazardous Substance (EHS) listed in Appendix A to Part 355, which must be reported on the Tier II report if it is present at the facility at any one time in an amount equal to or greater than 500 pounds.*
- *The EPA inspector requested calculations of the amount of sulfuric acid in all lead-acid batteries on site. FSPP provided a lead and acid weight report from DC Power Solutions. This report indicates the four lead acid batteries on site contains 1887.83 lbs. pure acid.*
- *The 9/27/2017 inspection report also stated sulfuric acid in the forklift batteries were not reported in the Tier II reports as required.*

INSPECTION REPORT REVIEW RECORD		
		Date:
Author:	*Toxics and Pesticides Enforcement Section Inspector*	*11/22/2023*
Final Reviewer:	*Section Supervisor*	*12/6/2023*