



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 155
Seattle, WA 98101

ENFORCEMENT &
COMPLIANCE ASSURANCE
DIVISION

**Clean Air Act - Section 112(r)
Risk Management Program
and EPCRA 312 – Tier II
Facility Inspection Report**

FACILITY INFORMATION:

Name: Alpenrose Dairy
Physical Address: 6149 S.W. Shattuck Rd. Portland, OR 97221
Phone Number: 503-244-1133
Latitude/Longitude: (45.478885, -122.739784)
RMP Facility ID#: 1000 0001 0203
FRS ID#: 110000487679
EJ Concerns: Yes (Above 80%)

CONTACT INFORMATION (RMP Implementation):

Name: Carl Cadonau Jr.
Phone Number: (503) 244-1133
E-mail: None

EMERGENCY CONTACT INFORMATION:

Name: Patrick Ryan
Phone (24-hr): (503) 519-5086
E-mail: patrick@alpenrose.com
Website: <http://www.alpenrose.com>

TRIP DETAILS:

Inspection Date: March 15, 2023
Inspection Time: 09:00 through 15:15
EPA Inspection Team:

Terry Garcia, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Edward Johannes, US EPA Region 10 SEE Grantee, EPCRA Inspector
Peter Phillips, US EPA Region 10 SEE Grantee, RMP Inspector
Mhara Coffman, US EPA Region 10, RMP Inspector
Taylor Law, Weston Solutions, Inc., EPA START Contractor

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: May 19, 1999

Date of Latest Update: June 24, 2019

Process (Program 1, 2, 3) as reported in RMP:

Process ID	Description	Process Chemical ID	NAICS Code	Program Level	Chemical Name CAS Number	Quantity (lbs)
1000100968	Refrigeration System	1000126424	1000102229	3	Ammonia, Anhydrous (7664-41-7)	20,000

PURPOSE:

The purpose of this inspection was to determine if this facility is in compliance with Section 112(r) of the Clean Air Act and Title 40 Code of Federal Regulations (CFR) Part 68, Chemical Accident Prevention Provisions.

The facility has been previously inspected in the past 5 years: No ☒ Yes ☐*If Yes, Date of Last Inspection:* January 13, 2014The facility is High Risk: No ☐ Yes ☒Joint EPCRA inspection: No ☐ Yes ☒**CAA Title V Air Permit:**Does the facility have a CAA Title V Permit? No ☒ Yes ☐*If Yes, Permit Number:***RELEASE/ACCIDENT HISTORY:**Did the facility have a reportable release in the past 5 years? No ☒ Yes ☐*If Yes, Date and Description of the Release:***EPCRA TIER II REPORTING:**Did the facility submit their Tier II report to the SERC? No ☐ Yes ☒*If Yes, Date the Tier II was submitted:* March 14, 2023*If No, calendar year of the most recent Tier II:*Did the facility submit a Tier II to the LEPC and local fire department? No ☐ Yes ☒*If Yes, Date the Tier II was submitted:* March 14, 2023**INSPECTION ENTRY:**

Terry Garcia led the inspection entry. The EPA Inspection Team (EPA) met with facility representatives at the Alpenrose Dairy facility in Portland, Oregon. EPA arrived at the facility at 0845 hours and was joined by the following facility personnel:

Name	Title, Organization
Larisa Palmentere	EH&S Manager – Alpenrose Dairy
Nancy Gammond-Moody	Director of HR – Alpenrose Dairy
Brad Armstrong	Maintenance Manager – Alpenrose Dairy
Larry Bailey II	Contracted Service Tech – APCCO
John White	Maintenance Manager – Alpenrose Dairy

Was a state/county/or local emergency representative present? No ☐ Yes ☒

If Yes, Name and Title of Representative: Bryan Profit, Portland Fire Department

The facility is a first responder: No ☒ Yes ☐

If No, Responding Agency: Portland Fire Department

Facility representatives escorted EPA to a conference room located in the facility's office building. Lead Inspector Terry Garcia introduced all parties present, provided a summary of the Risk Management Program (RMP), and explained the purpose of the visit. Each EPA Inspector presented his/her credentials.

EPA then requested an explanation of the facility's operations and any additional safety measures that should be taken during the site tour. Facility representative Larisa Palmentere gave a brief description of the facility, operations, and personal protective equipment required for the tour. It was stated that Alpenrose facility will move operations in 2024 to different Portland area location.

Prior to the inspection, EPA sent a certified notice of inspection letter to the facility informing them of the 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, and that a copy of the letter must be provided to the employee representative(s) and the letter posted in a manner accessible to employees in the facility.

The facility is unionized: No ☐ Yes ☒

If Yes, Name of Union: Teamsters Union

An employee representative present during the facility visit: No ☐ Yes ☒

If Yes, Name/Title: John White – Maintenance Manager

GENERAL INFORMATION:

The facility is regulated under RMP as a Program Level 3 facility and is owned and operated by Smith Brothers LLC and Alfin Investments – Alpenrose Family. The facility operates as a dairy production and cold storage facility and utilizes one anhydrous ammonia refrigeration system to support production and storage of milk, cottage cheese, sour cream, and ice cream mix. The refrigeration system utilizes 20,000 pounds of anhydrous ammonia to refrigerate the facility's cold storage rooms. There are 150 full-time employees on site including four operators that work on the regulated process. Six AAPCO Contractors conduct maintenance on the refrigeration process equipment.

ON-SITE OBSERVATIONS:

EPA toured the facility from approximately 1000 hours to 1200 hours, escorted by facility representatives Larisa Palmentere, Brad Armstrong, Larry Bailey II, John White, and Nancy Gammond-Moody. One engine room houses refrigeration system components, supported by roof-mounted condensers. The refrigeration system services cold storage rooms and productions chillers at the facility. EPA observed four [4] cold storage rooms (School Dairy Cold Storage, Nut Cold Storage Cold Storage Room 3, and Cold Storage Room 4), The Milk Chiller Room, Fabrication Room, Compressor Room (engine room), and the Ludell Engine Room. EPA also observed exterior areas of the facility and viewed the roof-mounted condensers from below.

Ammonia is present in the Milk chiller (photos 5-12) and engine rooms (photos 49-71). The milk chiller room contains an operational chiller and one decommissioned chiller, the room also has two ammonia sensors with alarms set to notify personnel at 25, 50, and 100 ppm concentrations. The entire facility

system will shut down if an ammonia concentration of 1,600 ppm is detected. EPA observed the Compressor Room containing an oil-water separator, ammonia detection system and alarm, compressors, ammonia lines, and intake/exhaust vents (photos 49-65). The Luddell Engine Room includes an ammonia detection system and alarm, ammonia lines, and eye wash station and hazcom signage (photos 66-71).

EPA observed staged product and evaporators in the cold rooms including the School Dairy Cold Room (photo 1), the Nut Cold Storage Room (photo 2), and a connecting hallway which includes emergency shower and eye wash station (photos 3-4). EPA observed refrigeration system components and safety features in the Milk Chiller Room (photo 5), including an ammonia detection system (photo 6), ammonia tanks, piping, and valves (photos 7-12). In the Milk Chiller Room, pressure relief valve (PRV) inspection tags were observed as overdue. Replace by October 2022 foreground tag; second tag install date: October 2017. Both PRV tags show replacement dates are overdue (photo 12).

EPA observed additional refrigerated areas including the Temperature Exchange Room (photos 13-14, 27-29), Cold Storage Room 4 (photos 15-23), Cold Storage Room 2 (photos 23-24), Cold Storage Room 3 (photos 25-26)

Exterior areas of the facility include NFPA placards, hazardous communication (hazcom) signage, a windsock next to the roof-mounted condensers and ammonia lines (photos 30-36, 44-48).

The Fabrication Room at the facility includes ceiling-mounted condensers, an ammonia detection system alarm, fire suppression and first aid supplies, ammonia lines and valves, and intake/exhaust vents (photos 37-43). EPA observed the Compressor Room containing an oil-water separator, ammonia detection system and alarm, compressors, ammonia lines, and intake/exhaust vents (photos 49-65).

Photographs taken during the inspection are included in Attachment A of this report.

After touring the RMP-covered process areas at the facility, EPA returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to Larisa Palmentere, Brad Armstrong, Larry Bailey II, John White, and Nancy Gammond-Moody.

INFORMATION COLLECTED FROM FACILITY:

1. Mechanical Integrity documentation
2. Alpenrose facility map
3. Alpenrose Ammonia refrigeration system diagrams
4. Compliance Audit example

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

1. **Compliance Audits:** Alpenrose Dairy did not certify that they have evaluated compliance with the provisions of this subpart at least every three years to verify that the procedures and practices developed under this subpart are adequate and are being followed. [68.79(a)]. Alpenrose did not provide documentation that a 2019 Compliance Audit was performed and was unable to provide the last two compliance audits. [69.79(c) and (e)]. Alpenrose Dairy provided PSM Meeting documents dated 2019 and 3/13/2022 in lieu of a compliance audit.

2. **Process Hazard Analysis (PHA):** Alpenrose Dairy did not complete PHA revalidation at least every five (5) years after the completion of the initial 2015 PHA and 2022 PHA revalidation. [68.67(f)].
3. **Employee Participation:** Alpenrose Dairy does not have a written plan of action regarding employee participation. At the time of inspection, it was noted that employees have access to PHA via company Drive however there is no proof that the company has assured employees are aware of the conduct and development of process hazard analyses or other process safety management in chemical accident prevention. [68.83 (a-c)].
4. **Contractors:** Alpenrose Dairy did not obtain and evaluate information regarding the contract owner or operator's safety performance and programs. Alpenrose did not provide documentation that demonstrates they have periodically evaluated the performance of contractors as required. [68.87(b)(1), (b)(4) and (b)(5)].
5. **Training:** Alpenrose Dairy was unable to provide initial and refresher training documentation for operators that show site specific SOP training. Alpenrose Dairy did provide some training documents on ammonia safety but no SOP training for the three operators (Andrew LaBelle, John White and Bradley Armstrong).
6. **Operating Procedures:** Alpenrose Dairy was unable to provide documentation that shows operating procedures are certified annually and are current and accurate. [68.69(c)]
7. **Emergency Response:** Alpenrose Dairy has not maintained a record of each notification exercise conducted within the last five years. [68.96 (a)].
8. **Mechanical Integrity, Training for Process Maintenance Activities:** Alpenrose Dairy did not provide documents that demonstrate they train each employee involved in maintaining the on-going integrity of process equipment in an overview of that process and its hazards and in the procedures applicable to the employee's job tasks to assure that the employee can perform the job tasks in a safe manner. [68.73(c)]. Alpenrose was unable to provide training documentation for six AAPCO contractors that perform maintenance at the site.
9. **RMP Required Corrections:** Emergency contact information—Beginning June 21, 2004, within one month of any change in the emergency contact information required under 68.160(b)(6), the owner or operator shall submit a correction of that information. [68.195(b)]. At the time of inspection Mr. Patrick Ryan was still listed as the emergency contact in their RMP who left the company in 2022.
10. **EPCRA Compliance:** Alpenrose Dairy 2022 Tier II report was submitted thirteen (13) days late to the SERC, LEPC and Fire.

DOCUMENTS REQUESTED NOT INCLUDED IN REPORT:

The following documents were requested during the inspection but are not included in this report. These documents will still be reviewed to determine compliance with Section 112(r) of the Clean Air Act.

1. Engine room ventilation calculations documentation needed
2. Relief system design basis documentation

3. APCCO contractor maintenance training documentation
4. Refresher training documentation for facility operators
5. Initial training documentation for facility operators
6. 2019 Mechanical integrity audit tracking for all findings documentation
7. SOP annual certification documentation 2021 and 2022

On June 14, 2023, EPA requested additional information and clarification from Alpenrose Dairy facility on the items listed above that were provided on March 28, 2023. In June 26, 2023, email Alpenrose Dairy stated they are unable to provide any additional documentation to complete the request for documents.

INSPECTION REPORT CERTIFICATION:

This is to certify that I, Terry Garcia, was the lead inspector at this facility and that I have verified the accuracy of the observations in this inspection report:

Terry Garcia Digitally signed by Terry Garcia
Date: 2023.07.31 15:07:37
-07'00'
Inspector Signature

JAVIER MORALES Digitally signed by JAVIER
MORALES
Date: 2023.07.31 15:28:15 -07'00'
RMP Coordinator/Approval

ERIN WILLIAMS Digitally signed by ERIN
WILLIAMS
Date: 2023.08.01 09:07:45 -07'00'
EPCRA Coordinator/Approval

**MATTHEW
QUARTERMAN** Digitally signed by MATTHEW
QUARTERMAN
Date: 2023.08.01 13:34:34 -07'00'
Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: Alpenrose Dairy
City, State: Portland, Oregon
Photographer: Taylor Law

File	Photo Layout ID	Date	Description
Photo 1.jpg	1	3/15/2023	School Dairy Cold Storage Room, overview
Photo 2.jpg	2	3/15/2023	Nut Room Cold Storage Room, overview
Photo 3.jpg	3	3/15/2023	Entrance Hallway, connecting small cold storage rooms to Cold Storage Room 4
Photo 4.jpg	4	3/15/2023	Cold Storage Room 4, eyewash station
Photo 5.jpg	5	3/15/2023	Milk Chiller Room, overview
Photo 6.jpg	6	3/15/2023	Milk Chiller Room, ammonia detection system
Photo 7.jpg	7	3/15/2023	Milk Chiller Room, chiller system and ammonia piping
Photo 8.jpg	8	3/15/2023	Milk Chiller Room, chiller system tanks and piping
Photo 9.jpg	9	3/15/2023	Milk Chiller Room, chiller system components
Photo 10.jpg	10	3/15/2023	Milk Chiller Room, chiller system inspection sticker
Photo 11.jpg	11	3/15/2023	Milk Chiller Room, chiller system tanks, valves and piping
Photo 12.jpg	12	3/15/2023	Milk Chiller Room, PRV inspection tags
Photo 13.jpg	13	3/15/2023	Temperature Exchange Room, overview
Photo 14.jpg	14	3/15/2023	Temperature Exchange Room, evaporators
Photo 15.jpg	15	3/15/2023	Cold Storage Room 4, overview
Photo 16.jpg	16	3/15/2023	Cold Storage Room 4, overview
Photo 17.jpg	17	3/15/2023	Cold Storage Room 4, dairy product carton/container area
Photo 18.jpg	18	3/15/2023	Cold Storage Room 4, ammonia piping
Photo 19.jpg	19	3/15/2023	Cold Storage Room 4, ammonia detector proximal to ceiling piping
Photo 20.jpg	20	3/15/2023	Cold Storage Room 4, small ammonia evaporators
Photo 21.jpg	21	3/15/2023	Cold Storage Room 4, Small ammonia evaporators
Photo 22.jpg	22	3/15/2023	Cold Storage Room 4, ammonia line transfer with labeling
Photo 23.jpg	23	3/15/2023	Transition from Cold Storage Room 4 to Cold Storage Room 2, ammonia transfer lines
Photo 24.jpg	24	3/15/2023	Cold Storage Room 2, ammonia evaporators
Photo 25.jpg	25	3/15/2023	Cold Storage Room 3, ammonia evaporators
Photo 26.jpg	26	3/15/2023	Cold Storage Room 3, staged milk cartons
Photo 27.jpg	27	3/15/2023	Temperature Exchange Room, ammonia evaporators and staged milk cartons
Photo 28.jpg	28	3/15/2023	Temperature Exchange Room, ammonia sensor
Photo 29.jpg	29	3/15/2023	Temperature Exchange Room, evaporators
Photo 30.jpg	30	3/15/2023	Cold Storage Room 3, hazard communication (hazcom) signage at exit
Photo 31.jpg	31	3/15/2023	Maintenance Room, hazcom signage at entrance
Photo 32.jpg	32	3/15/2023	Facility Building Exterior, roof-mounted condenser and windsock

Photo 33.jpg	33	3/15/2023	Facility Building Exterior, roof-mounted condenser
Photo 34.jpg	34	3/15/2023	Facility Exterior / Fabrication Shop, eyewash station
Photo 35.jpg	35	3/15/2023	Facility Exterior / Engine Room, ammonia detector and alarm and hazcom signage outside access door
Photo 36.jpg	36	3/15/2023	Facility Exterior / Fabrication Shop, ammonia detector and reading display at access door
Photo 37.jpg	37	3/15/2023	Fabrication Room, ammonia lines for ceiling-mounted condensers
Photo 38.jpg	38	3/15/2023	Fabrication Room, ammonia alarm
Photo 39.jpg	39	3/15/2023	Fabrication Room, fire suppression and first aid equipment at access door
Photo 40.jpg	40	3/15/2023	Fabrication Room, air intake on wall
Photo 41.jpg	41	3/15/2023	Fabrication Room, ammonia lines and valves
Photo 42.jpg	42	3/15/2023	Fabrication Room, ammonia lines and ammonia detector
Photo 43.jpg	43	3/15/2023	Fabrication Room, overview of housekeeping
Photo 44.jpg	44	3/15/2023	Facility Exterior, roof mounted condensers above Fabrication Room
Photo 45.jpg	45	3/15/2023	Facility Exterior, roof mounted condensers above Fabrication Room
Photo 46.jpg	46	3/15/2023	Facility Exterior, roof mounted condensers above Fabrication Room
Photo 47.jpg	47	3/15/2023	Facility Exterior, roof mounted condensers above Fabrication Room
Photo 48.jpg	48	3/15/2023	Facility Exterior, roof mounted condensers and ammonia lines above Fabrication Room
Photo 49.jpg	49	3/15/2023	Compressor Room, oil/water separator
Photo 50.jpg	50	3/15/2023	Compressor Room, ammonia alarm
Photo 51.jpg	51	3/15/2023	Compressor Room, ammonia lines compressors
Photo 52.jpg	52	3/15/2023	Compressor Room, ammonia detector
Photo 53.jpg	53	3/15/2023	Compressor Room, ammonia detector
Photo 54.jpg	54	3/15/2023	Compressor Room, inspection dates on ammonia gas sensor
Photo 55.jpg	55	3/15/2023	Compressor Room, system intake
Photo 56.jpg	56	3/15/2023	Compressor Room, system exhaust vent
Photo 57.jpg	57	3/15/2023	Compressor Room, second system air intake
Photo 58.jpg	58	3/15/2023	Compressor Room, compressor inspection documentation
Photo 59.jpg	59	3/15/2023	Compressor Room, inspection tags on compressor
Photo 60.jpg	60	3/15/2023	Compressor Room, ammonia transfer system components
Photo 61.jpg	61	3/15/2023	Compressor Room, ammonia lines
Photo 62.jpg	62	3/15/2023	Compressor Room, ammonia lines and compressors
Photo 63.jpg	63	3/15/2023	Compressor Room, recirculation unit
Photo 64.jpg	64	3/15/2023	Compressor Room, inspection sticker on recirculation unit
Photo 65.jpg	65	3/15/2023	Compressor Room Exterior, ammonia alarm
Photo 66.jpg	66	3/15/2023	Luddell Engine Room, ammonia detector
Photo 67.jpg	67	3/15/2023	Luddell Room, ammonia alarm at access door and hazcom signage
Photo 68.jpg	68	3/15/2023	Luddell Room, ammonia lines
Photo 69.jpg	69	3/15/2023	Luddell Room, ceiling damage
Photo 70.jpg	70	3/15/2023	Luddell Room, eyewash station
Photo 71.jpg	71	3/15/2023	Luddell Room, ammonia lines