

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

FACILITY INFORMATION:

Name: Alyeska Seafoods, Inc.
Physical Address: 551 W. Broadway, P.O. Box 530, Unalaska, Alaska 99685
Phone Number: (907) 581-7545
Latitude/Longitude: 53.878655/-166.540183
EPA Facility ID# 1000 0001 3521

CONTACT INFORMATION (RMP Implementation):

Name: Randy Laforteza
Phone Number: (907) 581-7530
E-mail: randy@wsi.us

EMERGENCY CONTACT INFORMATION:

Name: Randy Laforteza
Phone (24-hr): (907) 359-7544
E-mail: randy@wsi.us
Website: www.ci.unalaska.ak.us

AUDIT DETAILS:

Contact Date: 7/27/2021
Inspector: Peter Phillips, US EPA Region 10 SEE Grantee, RMP Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: 5/24/1999
Date of Latest Update: 1/31/2017 (CDX Correction 5/28/2021)

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)
1000075775	Ammonia Refrigeration	1000093901	31171	3	Ammonia, Anhydrous (7664-41-7)	55,000

PURPOSE:

The purpose of this document review was to determine whether 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 and compliance with Section 312 of the Emergency Planning and Community Right to Know Act (EPCRA) which requires the Tier II Chemical Inventory Reports to be submitted annually. EPA Region 10 RMP inspectors will not be conducting onsite inspections due to the COVID-19 pandemic requiring restricted travel and social distancing by the Centers for Disease Control (CDC) to prevent the spread of COVID-19. EPA Region 10 will coordinate with the RMP facility to schedule an onsite inspection when the CDC has determined it is safe.

- The facility has been previously inspected in the past 5 years: No ☒ Yes ☐
- Is the emergency contact information current? No ☐ Yes ☒
- The 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 ☐

RELEASE/ACCIDENT HISTORY:

Did the facility have a reportable release in the past 5 years? No ☒ Yes ☐

EPCRA TIER II REPORTING HISTORY:

Did the facility submit their 2020 Tier II report to the SERC? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 2/28/2021

Did the facility submit a Tier II to the LEPC and local fire department? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 2/28/2021

GENERAL INFORMATION:

The facility is regulated under the Risk Management Program as a Program Level 3 process and is owned and operated by Alyeska Seafoods, Inc. (Alyeska Seafoods) a subsidiary of Maruha Nichiro Corporation. The Alyeska Seafoods facility located in Unalaska, Alaska has been operating since 1978. The facility produces fresh and frozen seafood products and is staffed year-round employing a large seasonal workforce during certain portions of the year; the timing is dependent on fishing quotas and seasons. There are 147 full-time employees on site. They use a contractor, iWorkWise located in Bellevue, Washington to manage their RMP/PSM program.

Alyeska Seafoods uses and stores anhydrous ammonia as a refrigerant for cold storage and freezing seafood products. The facility has two separate refrigeration systems. Alyeska Seafoods reported an ammonia inventory of 55,000 pounds that exceeds the 10,000-pound threshold quantity of anhydrous ammonia.

INFORMATION REQUESTED FROM FACILITY:

1. **Process Hazard Analysis** – last two PHAs/revalidations
2. **Compliance Audit** – last two compliance audit reports
3. **Training** – operator/maintenance training

ANALYSIS OF DOCUMENTATION SUBMITTED:

1. **Process Hazard Analysis (PHA):** Alyeska Seafoods provided their 2014 and 2019 PHA revalidations. The 2014 PHA revalidation conducted on August 19, 2014. All findings and recommendations were completed, and no items were carried over to the 2019 PHA. The 2019 PHA revalidation was conducted on August 8, 2019. The 2019 PHA shows that 56 findings and recommendations were identified, with 10 open findings that have a completion of December 31, 2021. The 2019 PHA revalidation was completed five years after 2014 PHA.
2. **Compliance Audit:** Alyeska Seafoods provided their 2016 and 2019 Compliance Audit reports including finding tracking sheets. All 2016 Compliance Audit findings were addressed by December 30, 2016 and no items were carried over to the 2019 Compliance Audit. The 2019 compliance audit shows 39 findings, with two open findings that were assigned a completion date of December 31, 2021. Alyeska Seafoods is performing their compliance audits every three years.
3. **Training:** Alyeska Seafoods provided a completed Training Summary form for their six system operators with one experienced operator and five newly hired operators. Alyeska Seafoods

provided initial and refresher training documentation for their senior system operator, Aureliano Ahumada. Alyeska Seafoods provided initial training documentation for their five newly hired system operators who were trained on the following dates:

Name	Initial Training	Refresher Training
Aureliano Ahumada	2/27/2018	8/2/2021
Randy Laforteza	6/1/2021	N/A
Jonathan Bungcayao	8/28/2020	N/A
Elson Rico	7/15/2021	N/A
Philip Osana	1/30/2021	N/A
Juvelino Buscato	1/15/2021	N/A

The training included the facility's Standard Operating Procedures and safe work practices. All operators acknowledged that they received and understood said training by initialing subject training documentation.

AREAS OF CONCERNS:

No areas of concern were identified during the document review.

The findings in this report will be discussed with the facility via telephone and email after certification of this report.

DOCUMENTS REQUESTED ON FOLLOW-UP:

No follow-up documents were requested.

AUDIT REPORT CERTIFICATION:

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

Signature

Date

RMP Coordinator/Approval

Date

EPCRA Coordinator/Approval

Date

Land Enforcement Section Chief/Approval

Date