EPA United States Environmental Protection Agency

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	September 23-25, 2024	
Media Program:	Air	
Regulatory Program(s)	Clean Air Act (CAA) § 112(r)(1) – General Duty Clause and § 112(r)(7) - 40 Code of Federal Regulations (C.F.R.) Part 68 Chemical Accident Risk Management Program (RMP)	
Company Name:	Kerry, Inc	
Facility Name:	Kerry-Fort Worth	
Facility Physical Location:	7401 Will Rogers Blvd.	
(city, state, zip code)	Fort Worth, TX 76140	
Mailing address:	7401 Will Rogers Blvd.	
(city, state, zip code)	Fort Worth, TX 76140	
County/Parish:	Tarrant	
Facility Phone Number	682-215-3407	
Facility Contact:	Tim Gest	Engineering Manager
	timothy.gest@kerry.com	
FRS Number:	110040859470	
Identification/Permit Number:	AIR TX0000004843900589	
Media Identifier Number:	RMP 1000 0011 9935	
NAICS:	311991 Perishable Prepared Food Manufacturing	
SIC:	2013 Sausages And Other Prepared Meats	
Personnel participating in inspection:		
Aimee Boss	EPA Region 6 Chemical Accident Enforcement (ECDAC)	Physical Scientist
Julia Torres	EPA Region 6 ECDAC	Physical Scientist
Frank Andrzejewski	Kerry-Fort Worth	Engineering Manager
Tim Gest	Kerry-Fort Worth	Maintenance Planner
Cindy Hamil	Kerry-Fort Worth	Maintenance Planner
Scott Hudson	Refrigeration, Construction, and Engineering Inc.	Contractor
Thomas Lopez	Kerry-Fort Worth	EHS Manager
Robin Rushinko	Kerry-Fort Worth	Plant Manager
Jose Sierra	Kerry-Fort Worth	Safety Supervisor
Robbie Stone	Kerry-Fort Worth	Maintenance Manager
Charles Suits	Kerry-Fort Worth	Maintenance Manager
EPA Lead Inspector Signature/Date	AIMEE BOSS Digitally signed by AIMEE BOSS Date: 2024.12.02 09:38:26 -06'00'	
	Aimee Boss	Date
Supervisor Signature/Date	SAMUEL TATES Digitally signed by SAMUEL TATES Date: 2024.12.05 09:12:14 -06'00'	
	Samuel Tates	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

United States Environmental Protection Agency (EPA) Region 6 inspectors Julia Torres and Aimee Boss ("EPA or we") arrived at the Kerry- Fort Worth facility ("Kerry" or "the Facility") at 9:00 AM on December 11, 2023, for an announced inspection. We met with Frank Andrzejewski, EHS Director; Tim Gest, Engineering Manager; Cindy Hamil, Maintenance Planner; Scott Hudson, contractor for Kerry working for Refrigeration, Construction, and Engineering Inc. ("RC&E"); Thomas Lopez, EHS Manager; Robin Rushinko, Plant Manager; Jose Sierra, Safety Supervisor; Robbie Stone, Maintenance Manager; and Charles Suits, Maintenance Manager at the opening conference. We presented our credentials to Thomas Lopez and informed him that this was an EPA inspection to evaluate compliance with the requirements of the Chemical Accident Prevention Provisions of 40 C.F.R. Part 68 and the CAA §§ 112(r)(1) and (7). Employee representatives were invited to participate in the inspection. The facility does not have union representation.

FACILITY DESCRIPTION

Kerry is located in south Fort Worth, near Interstate 35 and Interstate Loop 820. The facility operates 24 hours a day, seven days a week with approximately 240 employees. The facility is a large refrigeration warehouse with multiple sections, which utilizes an anhydrous ammonia refrigeration system to keep products at temperatures just above or well below freezing to preserve food products and meet food safety standards. The facility opened in 1994 and Kerry became the owner in 2018. The facility has 79,600 pounds of anhydrous ammonia onsite, which is above the 10,000-pound threshold quantity for RMP regulated toxic substances. Anhydrous ammonia is the only RMP regulated substance present at Kerry. An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under §68.115, shall comply with the requirements of the Part 68 – Chemical Accident Prevention Provision. Kerry submitted its most recent RMP registration in June 2020 at the time of EPA's inspection and identified the ammonia refrigeration system as a Program Level 3 facility.

Section II - OBSERVATIONS

EPA conducted a review and observations during the inspection with Kerry personnel noted on the sign in sheets (see Appendix 1). The EPA team also accompanied Kerry personnel on a brief walking tour of the facility during the inspection to view the areas that house the refrigeration system key equipment and components.

40 C.F.R. Part 68 – CHEMICAL ACCIDENT PREVENTION PROVISION

Subpart A – General

40 C.F.R. § 68.10 Applicability – Kerry is a stationary source that has more than a threshold quantity of a regulated substance in their process. The current RMP submittal at the time of EPA's inspection was on June 2, 2020, by Kerry, and the most recent submittal was made September 17, 2024. Kerry is an RMP Program Level 3 facility that is also subject to the Occupational Safety and Health Administration's (OSHA) Process Safety Management (PSM) Standard (29 CFR § 1910.119).

40 C.F.R. § 68.12 General requirements – Kerry resubmitted their most recent RMP registration update on September 17, 2024, to update the person responsible for Part 68 implementation. The regulated substance included in the registration in the toxics table is ammonia, which is listed over the threshold quantity for the RMP Program Level 3 process.

40 C.F.R. § 68.15 Management – Kerry has developed a management system to oversee the implementation of the risk management program elements. Kerry provided an organizational chart that outlined the positions for implementation of the individual elements of the RMP, as required by this subpart.

Subpart B – Hazard Assessment

40 C.F.R. § 68.20 Applicability – Kerry operates an RMP Program Level 3 process which is subject to this subpart, and thus is required to conduct a hazard assessment, prepare a worst-case release scenario analysis, and complete the five-year accident history. We reviewed the documentation provided to make this analysis and identified no areas of concern with this section.

40 C.F.R. § 68.22 Off site consequence analysis (OCA) parameters – The Kerry off site consequence analysis was completed on August 16, 2024. Kerry employed the parameters specified by EPA in this rule by using the RMP*Comp™ software. We reviewed the OCA and supporting documentation and found no issues with this part.

40 C.F.R. § 68.25 Worse-case release scenario analysis – Kerry identified and analyzed at least one worst-case scenario in its Program 3 process using the RMP* Comp™ software, thus meeting the requirements of the regulation.

40 C.F.R. § 68.28 Alternative release scenario analysis – Kerry identified and analyzed at least one alternative release scenario in its Program 3 process using the RMP* Comp™ software, thus meeting the requirements of the regulation.

40 C.F.R. § 68.30 Defining off site impacts-population – Kerry used MARPLOT data to determine the population and the distances to endpoints, as required by this subpart.

40 C.F.R. § 68.33 Defining off site impacts-environment – Kerry used MARPLOT data to determine the environmental receptors and the distances to endpoints, as required by this subpart.

40 C.F.R. § 68.36 Review and update – Kerry understands that documentation associated with the worst-case scenarios should be updated and reviewed at least every five years. The facility anticipates conducting a review in 2029.

40 C.F.R. § 68.39 Documentation – Kerry operates an RMP Program Level 3 process which is subject to this subpart, and thus is required to prepare a worst-case release scenario analysis and complete the five-year accident history. We reviewed the documentation provided to make this analysis and identified no areas of concern with the information included in the OCA data. The facility used the EPA Model RMP*Comp™, thus meeting the requirements of the regulation.

40 C.F.R. § 68.42 Five-year accident history – Kerry did not report any accidental release(s) in their RMP that resulted in deaths, injuries, or property damage. The June 12, 2023, release does not meet the RMP reportable criteria. We reviewed the documentation previously provided to EPA which summarized the release incident to make this determination and identified no areas of concern with this section.

Subpart D – Program 3 Prevention Program

40 C.F.R. § 68.69 Operating procedures – This section requires operating procedures to be certified annually. We reviewed several standard operating procedures for the covered process. We reviewed and discussed various operating procedures, including the operation of the US Petroleum (USPI) oil filters, high pressure receiver, evaporator condensers, ammonia screw compressor, the spiral freezer, and the lockout/tag out safety policy and procedure with Kerry personnel. Kerry personnel indicated that the operating procedures are being updated. The facility requests a work order for certification of the operating procedures. Several of the Kerry operating procedures were missing the "Approved by" signature as well as "approved date." EPA observed that the operating procedure for the Operation of the High Pressure Receiver reviewed indicated a "fail" status with no corrective actions provided. EPA found that the operating procedure for Operation of SD-1 Spiral Freezer had yellow highlight and incomplete phrases such as "Alarms below XX% or above XX%". The facility later provided additional documentation to EPA which included the annual certification for operating procedures in 2024 [**See AOC 1**].

EPA conducted a walkthrough of the facility and found several black locks that had not been filled out. The lockout/tagout procedure states that the lock out devices must clearly identify person applied. Additionally, the LOTO procedure referenced red, yellow, and green locks along with what the color lock indicated. This procedure did not reference black colored locks, which were later identified as Car seal locks. The facility provided an updated response on October 9, 2024, concerning the black locks. The facility has removed the black locks from these ammonia valves and replaced them with colored zip-ties and tags [**See AOC 2**].

40 C.F.R. § 68.71 Training – Initial training is required prior to an employee performing operations in a covered process, and refresher training is required at least every three years, or more frequently if needed to ensure safe operations. EPA reviewed the training policy for Kerry and requested a list of training records for operators. The documentation provided showed refresher training for two employees were missing for 2021 [**See AOC 3**].

40 C.F.R. § 68.73 Mechanical integrity (MI) – EPA reviewed mechanical integrity program documents, procedures, and records for the RMP covered process equipment. The Kerry MI program is overseen and implemented by the Plant Engineer/Maintenance Manager, and includes preventative maintenance elements, which consist of a combination of daily, weekly, monthly, semiannual, and annual inspections, depending on the type of process equipment and its function. The Mechanical Integrity documentation is tracked using their SAP Maintenance Management System (SAP/MMS). Kerry Refrigeration Technicians complete visual inspections. We identified no areas of concern with this section.

40 C.F.R. § 68.75 Management of change (MOC) – EPA discussed Kerry's written procedure for Management of Change (MOC) and associated documentation with Kerry's personnel. The MOCs are brought to attentions during the monthly PSM meetings, along with compliance audits, PHAs, and Mechanical Integrity. The MOC moves forward after the capital, budget, and management review. The

RC&E contractor fills out the initial MOC form, which requires the PSSR and post-modification checklists to be signed before the MOC is closed. Kerry initially used ASPM, a catalyst software, as the tracking software to track the status of MOCs but has since moved to a tracking spreadsheet. This change has not been indicated in the MOC policy [**See AOC 4**]. Kerry provided a list of the MOCs issued for the past 3 years. Of the eleven MOCs on this list, two have been completed. EPA reviewed an MOC form for an upgrade to the existing system. The form was missing a signature for the PSI reviewer, and the form did not indicate an expected completion date [**See AOC 5**]. The documentation also showed that the verification method for the MOC Operator/Contractor trainer was not circled [**See AOC 6**].

40 C.F.R. § 68.77 Pre-startup safety review (PSSR) – Kerry provided documentation regarding PSSR Inspection Testing and Records. EPA reviewed the PSSR for WS-1 North Engine Room and WS-2 South Engine Room. The PSSR for the North Engine Room had noted that the Pre-Startup Field Installation Inspection, the Final Status Pass/Fail Checklist indicated "fail" for Inspection, Test and/or Task P10 and P11. There was no supporting documentation provided demonstrating this status was addressed prior to start up provided during EPA's on-site inspection. The PSSR for the South Engine Room also noted that the Pre-Startup Field Installation Inspection, the Final Status Pass/Fail Checklist indicated "fail" for Inspection, Test and/or Task P11, in addition to missing a signature for the Pre-Startup Inspection [**See AOC 7**].

40 C.F.R. § 68.79 Compliance audits – EPA requested the most recent compliance audit for review. Kerry provided the compliance audit reports completed in October 2019 and November 2022. The next compliance audit will be due in 2025. Kerry tracks the actions of the findings and recommendation from the compliance audit in a tracking spreadsheet. The 2022 compliance audit was missing the signature of certification from the owner/operator [**See AOC 8**].

EPA reviewed the findings and recommendations of the 2019 and 2022 compliance audits. EPA found a repeat finding from the 2019 compliance audit that is still being addressed in the current 2022 compliance audit [**See AOC 9**].

40 C.F.R. § 68.81 Incident investigation – We reviewed the incident investigation procedure, OSHA reportable accident (300) logs, and work orders to identify all incidents which resulted in, or could have reasonably resulted in, a catastrophic release of a regulated substance. EPA noted found that two incident investigations from 2020 had corrective actions with no date of completion in the report. These incident investigations were missing the signatures for the section "investigation complete" as well as the "action items completed…investigation closed". EPA found one incident investigation for a July 7, 2023 incident was missing the signature for "investigation complete" as well as the "action items completed…investigation closed" line [**See AOC 10**]. Additionally, the OSHA incident log for 2020 was not available for review during the on-site inspection. The incident investigation procedure for Kerry indicates that documents will be retained for 5 years in the team file. However, the final page of the procedure states under the "Documentation" section that retention will be for 6 years in the team file. The facility clarified the procedure had a typo, and that the facility retains incident files for 5 years. The facility provided an updated Incident Investigation procedure on October 9, 2024, correcting this typo.

40 C.F.R. § 68.83 Employee participation – Kerry provided the employee participation policy and plan for review. The policy states in section 1.1.3 that employees shall acknowledge awareness of PSM by signing PSMF 201 Form I and Refrigeration operators to sign PSMF 201 Form IV." However, EPA reviewed the training binders for employees and found that PSMF 201 Form IV was not signed for two employees. On October 9, 2024, the facility provided the PSMF 201 Form IV form signed on October 2,2024 and October 7, 2024, by the two employees [**See AOC 11**].

40 C.F.R. § 68.85 Hot work permit – Kerry discussed the process for conducting hot work on site and we reviewed the hot work procedure. All hot work permits are kept on file until the work is completed, after which the signed off permits are kept for a minimum of three years. Kerry provided a blank hot work permit sample for review. EPA reviewed the documentation and found that Kerry utilizes two separate hot work permits, one for non-PSM areas and the other for work near the ammonia process, or PSM areas. The non-PSM hot work permits were not mentioned in the hot work program. The hot work permits for PSM areas were not provided for onsite review during this inspection but were provided to EPA on October 9, 2024. During EPA's off-site review of PSM hot work permits, we identified the hot work operator signature was missing for the July 5, 2024 PSM Hot Work Permit ER-1A and the July 6, 2024 PSM Hot Work Permit ER-1A-PR-3. Additionally, the July 6, 2024 PSM Hot Work Permit ER-1A-PR-3 checklist was missing a check mark to identify that the fire detection systems were operating properly [**See AOC 12**]. On September 30, 2024, Kerry changed to a single hot work permit and provided documentation of the new program to EPA on October 9, 2024.

Subpart E – Emergency Response

40 C.F.R. § 68.90 Applicability – Kerry is not a responding stationary source, and therefore is only required to meet limited requirements under Program Level 3 to coordinate with local response organizations and to conduct annual response notification exercises after making its initial notification. This must be completed after submitting an initial RMP registration, and at least annually prior to December 19, 2024, then annually thereafter.

40 C.F.R. § 68.93 Emergency response coordination activities – We reviewed Kerry's Emergency Action Plan. On page 33, the plan asks the question, "When is there an evac?" with no follow up procedures. Kerry provided an updated procedure with this question removed on October 4, 2024 [**See AOC 13**].

40 C.F.R. § 68.96 Emergency response exercises – As part of coordination with local emergency response officials required by §68.93, Kerry is required to conduct annual response notification exercises with the local fire department after its initial response coordination. Kerry provided documentation of contacting the local fire department, meeting the requirements of this part of the regulation.

Subpart G – Risk Management Plan

40 C.F.R. 68.160 Registration – Kerry's RMP registration included include an accurate emergency contact phone number. Kerry personnel confirmed that the phone number listed was correct and up to date.

40 C.F.R. § 68.190 Updates – Kerry's initial RMP submittal was on June 2, 2020, and the most recent submittal was made September 2024, to update the person responsible for RMP implementation, the emergency contact, and other points of contact.

40 C.F.R. § 68.195 Required corrections – The next RMP re-submission will be due by September 17, 2027. However, an additional update to correct the emergency contact phone number should have been made within one month after the March 4, 2022, update, as required by 40 C.F.R. § 68.160 and this section, if the facility had verified that the emergency contact phone number listed was invalid [**See AOC 14**].

Section III – AREAS OF CONCERN (AOC)

EPA Region 6 inspectors Aimee Boss and Julia Torres conducted a closing conference at Kerry at 4:00 pm on September 25, 2024, for the inspection. During the closing conference, Aimee Boss and Julia Torres reviewed 11 Areas of Concern during the inspection. During document review, EPA found 3 more Areas of Concern that are included.

AOC 1 - 40 CFR 68.69(c) Operating Procedures
(c)The owner or operator shall certify annually that these operating procedures are current and accurate.

Kerry failed to certify annually that the operating procedures were current and accurate. The signature was missing on several operating procedure reviewed. The sections indicating the "approved date" and "approved by" are empty. Additionally, one of the operating procedures had yellow highlight and an incomplete phrase. The facility later provided additional documentation to EPA which included the annual certification for operating procedures in 2024.

AOC 2 - 40 C.F.R. § 68.69(d) Operating Procedures
(d) The owner or operator shall develop and implement safe work practices to provide for the control of hazards during operations such as lockout/tagout.

Kerry failed to implement their lockout/tagout procedure and policy. During the facility tour EPA viewed several black locks that had not filled out. The lockout/tagout procedure states the "lock out devices must clearly identify person applied." Additionally, the LOTO procedure references red, yellow, and green locks along with their description of what each color means. This procedure does not reference black colored locks, which were later identified as car seal locks. The facility provided an updated response on October 9, 2024, concerning the black locks. The facility has removed the black locks from these ammonia valves and replaced them with colored zip-ties and tags.

AOC 3 - 40 C.F.R. § 68.71(a)(1) Training
Each employee presently involved in operating a process, and each employee before being involved in operating a newly assigned process, shall be trained in an overview of the process and in the operating procedures as specified in § 68.69. The training shall include emphasis on the specific safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks.

Kerry failed to ensure that their employees were up to date on refresher training. EPA reviewed the training records for employees and found that two operators were missing their 2021 refresher training records.

AOC 4 - 40 C.F.R. §68.75(e) Management of Change
(e) If a change covered by this paragraph results in a change in the operating procedures or practices required by §68.69, such procedures or practices shall be updated accordingly.

Kerry failed to include an update to its operating procedures as part of the MOC for the expansion. Kerry also failed to include a description of the tacking spreadsheet used to track MOCs in the MOC program document and procedures and provide an update to note the new tracking system.

AOC 5 - 40 C.F.R. §68.75(b)(4) Management of Change
(b) The procedures shall assure that the following considerations are addressed prior to any change… (4) Necessary time period for the change;

Kerry failed to indicate an expected completion date an MOC form for an upgrade to the existing system. Additionally, the MOC form was missing a signature for the PSI reviewer.

AOC 6 - 40 C.F.R. §68.75(b)(5) Management of Change
(b) The procedures shall assure that the following considerations are addressed prior to any change: … (5) Authorization requirements for the proposed change.

The MOC reviewed did not include an expected completion date for the expansion. The MOC PSSR and Post modification checklists for this expansion was also missing a signature from the process safety information reviewer.

AOC 7 - 40 C.F.R. §68.77(b) Pre-startup safety review
(b) The pre-startup safety review shall confirm that prior to the introduction of regulated substances to a process: (1) Construction and equipment is in accordance with design specifications; (2) Safety, operating, maintenance, and emergency procedures are in place and are adequate; (3) For new stationary sources, a process hazard analysis has been performed and recommendations have been resolved or implemented before startup; and modified stationary sources meet the requirements contained in management of change, §68.75. (4) Training of each employee involved in operating a process has been completed.

Kerry failed to confirm the PSSR checklist with “fail” indications had been resolved prior to start up. The PSSR for the North Engine Room had noted that the Pre-Startup Field Installation Inspection, the Final Status Pass/Fail Checklist indicated “fail” for Inspection, Test and/or Task P10 and P11. There was no supporting documentation provided demonstrating this status was addressed prior to start up provided during EPA’s on-site inspection. The PSSR for the South Engine Room also noted that the Pre-Startup Field Installation Inspection, the Final Status Pass/Fail Checklist indicated “fail” for Inspection, Test and/or Task P11, in addition to missing a signature for the Pre-Startup Inspection

AOC 8 - 40 C.F.R. §68.79(a) Compliance Audits
(a) The owner or operator shall certify that they have evaluated compliance with the provisions of this subpart at least every three years to verify that procedures and practices developed under this subpart are adequate and are being followed.

Kerry failed to certify their 2022 Compliance Audit. EPA reviewed the 2022 Compliance Audit and found the document was missing the owner/operator signature.

AOC 9 - 40 C.F.R. §68.79(d) Compliance Audits

(d) The owner or operator shall promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected.

EPA reviewed the findings and recommendations of the 2019 and 2022 compliance audits. EPA found a repeat finding from the 2019 compliance audit that is still being addressed in the current 2022 compliance audit.

AOC 10 - 40 C.F.R. §68.81(e) Incident Investigation

(e)The owner or operator shall establish a system to promptly address and resolve the incident report findings and recommendations. Resolutions and corrective actions shall be documented.

Kerry failed to address and resolve the incident report findings and recommendations. Kerry had four incidents in 2020. EPA reviewed the incident investigations and found that two incident investigations from 2020 had corrective actions with no date of completion in the report. These incident investigations were missing the signatures marking the action items as completed and that investigation had been closed line. EPA also found one incident investigation for a July 7, 2023 incident was missing the signature for marking the investigation as complete as well as the "action items completed … investigation closed" line. Additionally, the OSHA incident log for 2020 was not available for review during the on-site inspection.

AOC 11 - 40 C.F.R. §68.83(b) Employee Participation

(b) The owner or operator shall consult with employees and their representatives on the conduct and development of process hazards analyses and on the development of the other elements of process safety management in this rule.

Kerry failed to implement their policy on employee participation. The policy in section 1.1.3 states employees shall acknowledge awareness of PSM by signing PSMF 201 Form I and Refrigeration operators to sign PSMF 201 Form IV. In the initial training binders reviewed for two employees, the PSMF 201 Form IV had not filled out. On October 9, 2024, the facility provided the PSMF 201 Form IV form signed on October 2, 2024 and October 7, 2024, by the two employees.

AOC 12 - 40 C.F.R. §68.85(a) Hot Work

(a) The owner or operator shall issue a hot work permit for hot work operations conducted on or near a covered process. (b) The permit shall document that the fire prevention and protection requirements in 29 CFR 1910.252(a) have been implemented prior to beginning the hot work operations; it shall indicate the date(s) authorized for hot work; and identify the object on which hot work is to be performed.

Kerry failed to ensure hot work permits were filled out properly. During EPA's off-site review of PSM hot work permits, we identified the hot work operator signature was missing for the July 5, 2024 PSM Hot Work Permit ER-1A and the July 6, 2024 PSM Hot Work Permit ER-1A-PR-3. Additionally, the July 6, 2024 PSM Hot Work Permit ER-1A-PR-3 checklist was missing a check mark to identify that the fire detection systems were operating properly.

AOC 13 - 40 C.F.R. §68.93(b) Emergency response coordination activities

(b) Coordination shall include providing to the local emergency planning and response organizations: The stationary source's emergency response plan if one exists; emergency action plan; updated emergency contact information; and other information necessary for developing and implementing the local emergency response plan.

Kerry failed to provide follow up procedures to an incomplete question in the Emergency Action Plan. The facility provided an updated procedure with this question removed on October 4, 2024.

AOC 14 – 40 CFR 68.195(b) RMP Updates
(b) 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.

Kerry failed to update the RMP contact information within one month of change in personnel. This contact information had not been updated until September 17, 2024, despite the change in contact information starting in 2022.

Section IV – FOLLOW UP

EPA received additional documentation from Kerry after exiting the Facility on September 30, 2024, and October 9, 2024. This additional information was reviewed and considered for issuance of the inspection report.

Section V – LIST OF APPENDICES

No appendices are included in this inspection report.