



**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: Blount Fine Foods
Physical Address: 17771 NE Riverside Parkway Portland, Oregon 97230
Phone Number: 971-288-6439
Latitude/Longitude: 45.554247, -122.481942
RMP Facility ID# 1000 0024 0651
FRS ID#: 110069609579
EJ Concerns: Yes, 80% percentile.

CONTACT INFORMATION (RMP Implementation):

Name: Garth Ham, Plant Engineer/Maintenance Manager
Phone Number: 971-288-6439
E-mail: gham@blountfinefoods.com

EMERGENCY CONTACT INFORMATION:

Name: Garth Ham, Plant Engineer/Maintenance Manager
Phone (24-hr): 971-288-6439
E-mail: gham@blountfinefoods.com
Website: blountfinefoods.com

TRIP DETAILS:

Inspection Date: March 31, 2022
Inspection Time: 09:00 hours through 14:30 hours
Inspectors: Terry Garcia, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Peter Phillips, US EPA Region 10 SEE Grantee, RMP Inspector
Bob Hales, US EPA Region 10 SEE Grantee, RMP Inspector
Edward Johannes, US EPA Region 10 SEE Grantee, RMP Inspector
Tom Vroman, CIH, Weston Solutions, Inc., EPA START Contractor

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: August 4, 2021

Date of Latest Update: August 4, 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)
1000118092	Anhydrous Ammonia	1000147675	31199	3	Ammonia, Anhydrous (7664-41-7)	15,000

PURPOSE:

The purpose of this inspection 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.

- The facility has been previously inspected in the past 5 years: No ☒ Yes ☐
If Yes, Date of Last Inspection:
- 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 ☒

If Yes, Date and Description of the Release: NRC Report# 1311430 dated July 21, 2021 reported an ammonia release that occurred on June 27, 2021. The reported amount of ammonia released was 357 pounds. No injuries and/or evacuations were reported.

EPCRA TIER II REPORTING:Did the facility submit the 2021 Tier II report to the SERC? No ☐ Yes ☒*If Yes, Date the Tier II was submitted:* March 30, 2022*Did the facility submit the 2020 Tier II report to the SERC? No ☐ Yes ☒*If Yes, Date the Tier II was submitted:* August 2, 2021*

*See email correspondence with Todd Raska, Program Coordinator.

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 30, 2022

INSPECTION ENTRY:

Terry Garcia led the inspection entry. The inspection team met with Mr. John Cavanagh, Corporate Director of Engineer from MA and Mr. Garth Ham Plant Maintenance Manager at the Portland site and others at the Blount Fine Foods facility in Portland, Oregon. The team arrived at the facility at 09:00 and was joined by the following facility and contracted personnel:

Name	Title
Garth Ham	Maintenance Manager
Nigel McGinn	Supervisor of Corporate Operations
Gary Schwaub	Account Manager, Permacold Engineering
John Cavanagh	Director of Engineering
Sonya Pollard	Safety Associate Manager
Alanna Donovan	Corporate Safety & Security Manager
Emily Curtis	EHS Specialist, Maul Foster Alongi
Len Strunk	Service Tech, Permacold Engineering
Julie Pace	Health and Safety Specialist, Maul Foster Alongi
Bill Beadie	Principal IH, Maul Foster Alongi
Tom Thibeault	Vice President Operations
Brian Buck	Plant Manager

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

The facility is a first responder: No ☒ Yes ☐

If No, Responding Agency: Portland Fire Department and Gresham Fire and Emergency

The inspection team was escorted to a conference room located in the facility's office building. Introductions were made by Terry Garcia, who provided a summary of the risk management program (RMP) and explained the purpose of the visit. Each team member 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. Garth Ham gave a brief description of the facility, operations, and personal protective equipment required for the tour. All EPA inspectors wore safety shoes, eye and hearing protection and were required to wear Food Safety PPE (lab coat and hairnets) and follow all Food Safety protocols when entering food manufacturing areas.

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:

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

If Yes, Name/Title: Unionized Permacold Engineering contractors were present during the inspection: Len Strunk, Service Technician and Gary Schwaub, Account Manager.

GENERAL INFORMATION:

The facility is regulated under the Risk Management Program as a Program Level 3 facility and is owned and operated by Blount Fine Foods. Blount Fine Foods operates an ammonia refrigeration system to refrigerate food products such as soups, entrees, deserts, and sauces. Production requires the use of an ammonia refrigeration system to preserve the integrity of foods. The facility uses anhydrous ammonia as the refrigerant. The anhydrous ammonia is present inside food production operation areas, including the raw ingredients cooler, the finished goods cooler, packing room, engine room and in equipment on the roof.

The facility was constructed in 2002, and at that time the engine room had four compressors for the ammonia refrigeration system. In 2016 a compressor was added. Then in 2017 another compressor was added. Blount Fine Foods purchased the facility on September 30, 2019 and does not have records from the prior owner/operator, Harry's Fresh Foods. There are 100 full-time employees on site. At the time of the inspection, it was noted that there are no process modifications to the ammonia refrigeration system. The company has a plan to expand their refrigeration system operations in 2023.

ON-SITE OBSERVATIONS:

The facility tour was conducted from approximately 09:30 hours to 10:45 hours. The inspection team was escorted by Garth Ham, Len Strunk, Bill Beadie, John Cavanagh, and Alanna Donovan. The inspection team observed ceiling mounted evaporators in the raw ingredients cooler (photos 1, 3, 4, 5, 6, and 9), a finished goods cooler (photo 13), and packing area (photos 83, 85, 86, and 88). Two of three blast freezers were observed (photos 10, 11, 12, 14, and 15). The third blast cooler was not operational, and the ammonia line feeding the freezer was locked out (photos 71 and 72). There are ammonia gas detectors (photos 4, 5, 7, 82, 84 and 87) and alarms (photos 3, 16, 17, 21, 43, 82, 84 and 87) located throughout the facility.

The engine room is only accessible by selected personnel with keys, which include Garth Ham, and the contracted Permacold service technicians (photo 20). The engine room has six compressors, each compressor has a stamped tag indicating when it was last serviced (photo 24) and when it is due for its next service (photo 25). The engine room is equipped with normal and emergency ventilation to the exterior on the walls (photos 27, 33, 34, and 42) and the ceiling (photos 35 and 36). There are emergency stops inside (photo 28) and outside (photo 45) of the engine room. Low pressure receiver inside engine room with repair tags observed as iced over (photo 22). Oil pot inside machine room (photo 40) also shows ice visible on equipment.

The ammonia detection alarm levels (PPM) for the detectors and location are the following: Fixed sensors continuously monitor ammonia concentrations in the engine room and refrigerated process areas throughout the facility. The ammonia sensors will trigger a blue strobe light and a buzzer if concentrations exceed 25 ppm. There are two ammonia sensors in the engine room; the low-level sensor has a range of 0–500 ppm and the high-level sensor has a range of 0–20,000 ppm.

The roof is accessible by a ladder inside the facility (photo 78). This ladder does not extend past the height of the roof and was difficult to climb onto the roof. Blount Fine Foods provided a standing work order dated March 16, 2022, to install a safer ladder. The roof has two windsocks (photos 49 and 62). Corrosion and ice were visible on process equipment on the roof (photos 65, 67-70, 76 and 77).

Photographs were taken of the anhydrous ammonia refrigeration process. The photographs that were taken at the facility are included in Attachment A to this report.

After touring the RMP-covered process areas at Blount Fine Foods, the inspection team returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to the following people: Garth Ham, Nigel McGinn, Gary Schwaub, John Cavanagh, Sonya Pollard, Alanna Donovan, Emily Curtis, Len Strunk, Julie Pace, Bill Beadie, Tom Thibeault, and Brian Buck

INFORMATION COLLECTED FROM FACILITY:

1. Blount Fine Foods PSM/RMP Materials Table of Contents (2 pages - 11x14 inches)
2. Permacold MI Audit 2018 (12 pages)
3. Blount Fine Foods Memorandum of Record of Ammonia Release Dated July 21, 2021 (3 pages)
4. Email Calculating Amount of Ammonia Released (1 page)
5. Email Submission of Form 304 Emergency Release Notification to Oregon Fire Marshal (5 pages)
6. Refrigeration System Mass Flow Diagram (1 page – 11x14 inches)
7. Memorandum of Record Dated July 14, 2021, Timeline of Ammonia Release – 2 pages
8. Work Order to Replace Ladder to Roof Dated March 16, 2022 – 1 page
9. Operator Daily Walkthrough Training Record Dated March 25, 2022 – 1 page

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

1. Initial training did not include emphasis on safety and health hazards, emergency operations including shutdown, and safe work practices to the employee's job task [68.71(a)(1)]. Blount Fine Foods provided some training documentation at the time of the inspection, but did not include site specific operating procedures on training for operators and maintenance employees. The document dated 3/25/2022 entitled Daily Walk Through as 'Initial Training' for operators is a checklist for Health and Safety and Ammonia Awareness Training for six employees identified as mechanics. The one- page Daily walk- through form used by facility as initial training, included a space for SOP reference # on the form that was marked as "NA". The mechanics that initialed the sign off sheet for Daily Walk-through Training on 3/30/22 were Kevin Palododichuk, Jim Sams, Tim Lyons, Alex Wise, Ben Jones, Garth Ham. [REDACTED]
2. The owner or operator did not train each employee involved in maintaining the on-going integrity of process equipment [68.73(c)]. Blount Fine Foods did not provide training documentation demonstrating that maintenance/service technicians (Permacold) are trained on site specific maintenance procedures for refrigeration equipment. The Permacold service technicians are Len Strunk, Clay McMahon, Justin Schneider, Tony Jones, and Victor Nash.
3. The owner or operator did not correct deficiencies in the equipment that were outside acceptable limits defined by the process safety information before further use or in a safe and timely manner when necessary means were taken to assure safe operations [68.73(e)]. The 2018 Mechanical Integrity Audit conducted by Permacold did not track action items to correct deficiency of refrigeration equipment such as due dates, completion dates and persons responsible for action items.
4. The incident investigation was not initiated within 48 hours following an incident [68.81(b)]. Blount Fine Foods provided the Memorandum for Record, Ammonia Release-Portland Facility Date of Report Issuance, July 21, 2021, for the ammonia release that occurred on June 27, 2021.

5. The incident investigation report did not include any recommendations resulting from the investigation [68.81(d)(5)]. Blount Fine Foods provided the Memorandum for Record, Ammonia Release-Portland Facility Date of Report Issuance, July 21, 2021, for the ammonia release that occurred on June 27, 2021.

CERCLA Section 103 and EPCRA Section 304 Findings:

1. On July 21, 2021, Blount Fine Foods reported an ammonia release from their facility to the National Response Center (NRC) NRC#1311430. The date of the release was June 27, 2021. The release listed the facility as Harrys Fresh Foods. The release was determined to be 175 lbs. The facility reported the release about 24 days after the release occurred. No initial notification was reported to the SERC or the LEPC. The follow-up notification was submitted to the SERC on or about July 21, 2021.
2. Under CERCLA Section 103 and EPCRA Section 304, releases of hazardous substances over the reporting threshold are to be immediately reported to the NRC, SERC and LEPC. Immediately has been interpreted as within 15 minutes of knowledge of the release. Additionally, a follow-up notification must be provided to the SERC and LEPC within 30 days.
3. Blount Fine Foods was late in reporting the release and in submission of both their 2020 and 2021 Tier II reports to the Oregon Community Right to Know (CHS website). This was confirmed by Oregon Fire Marshal Office, SERC Program Coordinator, Mr. Todd Raska.

DOCUMENTS REQUESTED POST INSPECTION:

The following documents were requested post inspection to determine compliance with Section 112(r) of the Clean Air Act:

1. Photos of Engine Room Ammonia detectors and PPM levels.
2. Updated tracking sheet of 2022 Compliance Audit findings/recommendations and action items.
3. Training Summary and clarification for all facility process operators and maintenance.

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: 2022.07.15 15:23:45 -07'00'

Inspector Signature

JAVIER MORALES

Digitally signed by JAVIER
MORALES
Date: 2022.07.19 07:48:33 -07'00'

RMP Coordinator/Approval

ERIN WILLIAMS

Digitally signed by ERIN WILLIAMS
Date: 2022.07.18 15:45:58 -07'00'

EPCRA Coordinator/Approval

Jennifer A Sullivan

Digitally signed by Jennifer A Sullivan
Date: 2022.07.19 13:45:03 -07'00'

Land Enforcement Section Chief/Approval