

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

FACILITY INFORMATION:

Name: Allan Brothers
Physical Address: 31 Allan Road, Naches, WA 98937
Phone Number: (509) 949-0762
Latitude/Longitude: 46.718705/-120.673719
EPA Facility ID# 100000227131

CONTACT INFORMATION (RMP Implementation):

Name: Greg George, Director of Compliance
Phone Number: (509) 949-0762
E-mail: Greg.George@allanbrosfruit.com

EMERGENCY CONTACT INFORMATION:

Name: Thomas Allan, Owner
Phone (24-hr): (509) 949-0762
E-mail: tom@allanbrosfruit.com
Website: www.allanbrosfruit.com

AUDIT DETAILS:

Contact Date: February 9, 2021
Inspector: Peter Phillips, US EPA Region 10 SEE Grantee, RMP Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: 9/23/14
Date of Latest Update: 1/29/19

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)
1000093998	Refrigeration	1000117690	49312	3	Anhydrous Ammonia	27,000

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. 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: 2/8/2021

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

GENERAL INFORMATION:

The facility is regulated under the Risk Management Program as a Program Level 3 process and is owned and operated by Allan Brothers. Allan Brothers fruit packing and storage facilities are located throughout the Yakima Valley. The main facility located in Naches, Washington, packages and stores both apples and cherries. The Naches facility has two apple packing lines, two cherry packing lines, shipping and receiving docks, regular and controlled atmosphere storage warehouses, as well as the orchard management and corporate offices. Cherry harvest usually begins in early June and will generally stretch into early mid-August. Apple harvest typically begins mid-August and can last into early November. The facility operates two shifts starting at 05:30 and 16:30. There are 385 full-time non-union employees.

The Naches facility has four engine rooms with only one covered under RMP/PSM. The RMP-covered engine room has a reported ammonia inventory of 27,000 pounds exceeding the threshold quantity of 10,000 pounds. The engine room has three screw compressors with restricted access limited to facility operators, management, and contractors. The facility has one operator, two level 1 technicians, and four level 2 technicians (cleaners only). The engine is monitored by staff 24/7 and equipment control/shutdown can be performed remotely. The facility has a total of 72 cold storage rooms including 21 refrigerated and 51 controlled atmosphere rooms.

Allan Brothers conducts initial operator training at Garden City, Kansas and RETA certification. The facility also contracts with Double-Kold for refrigeration system repair and maintenance.

The opening conference was conducted with Greg George, Director of Compliance at 09:00 on February 10, 2021 via conference call.

INFORMATION REQUESTED FROM FACILITY:

1. Process Hazard Analysis – last two updates/revalidations.
2. Compliance Audit – last two compliance audit reports.
3. Training – operator/maintenance initial and refresher training records.

ANALYSIS OF DOCUMENTATION SUBMITTED:

1. Process Hazard Analysis: Allan Brothers submitted their 2016 and 2018 PHAs. The 2018 PHA update was initiated by a management of change on the addition of more controlled atmosphere rooms. No unresolved findings and recommendations were identified, and the facility is conducting PHAs as required by 40 CFR 68.67.

2. Compliance Audit: Allan Brothers submitted their 2015 and 2018 Compliance Audit reports. No unresolved findings were identified, and the facility is conducting an audit at least every three years as required by 40 CFR, Part 68.79(c).
3. Training: Allan Brothers provided training documentation indicating that they are performing initial and refresher training for their operator and technicians as required by 40 CFR 68.71.

AREAS OF CONCERNS:

1. Tier II Reporting Requirements: Allan Brothers could not produce confirmation that Tier II Reports were submitted to the LEPC and local fire department. Mr. George stated that the Tier II Reports were submitted via regular mail. The suggestion was made that future submissions be sent via certified mail.
2. No RMP findings 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 _____