

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

## **FACILITY INFORMATION:**

Name: Washington Fruit & Produce Company - Union Gap  
Physical Address: 2116 Rudkin Road, Union Gap, WA 98903  
Phone Number: (509) 457-6177  
Latitude/Longitude: 46.571444/-120.474722  
EPA Facility ID# 100000106244

## **CONTACT INFORMATION (RMP Implementation):**

Name: Shane Tillett  
Phone Number: (509) 457-6177  
E-mail: stillet@washfruit.com

## **EMERGENCY CONTACT INFORMATION:**

Name: Dave Toler  
Phone (24-hr): Chief Engineer  
E-mail: dave@washfruit.com  
Website: www.washfruit.com

## **AUDIT DETAILS:**

Contact Date: January 6, 2021  
Inspector: Peter Phillips, US EPA Region 10 SEE Grantee, RMP Inspector

## **DATE AND PROGRAM LEVELS OF SUBMITTED RMP:**

Initial Submission Date: 6/21/1999  
Date of Latest Update: 6/15/2016

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) |
|------------|----------------------|---------------------|------------|---------------|--------------------------|----------------|
| 1000072875 | Refrigeration System | 1000089925          | 115114     | 3             | Anhydrous Ammonia        | 17,000         |

## **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 the 2019 Tier II report to the SERC? No ☐ Yes ☒

*If Yes, Date the Tier II was submitted: 2/1//2020*

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 Washington Fruit & Produce Company (Washington Fruit). In 1984, the facility started production operations as an apple packing facility with controlled atmosphere storage. The hours of operation are 7 days per week from 7:00 to 16:00 during the apple harvesting season. Process operators are on call after hours and have the ability to access the refrigeration system controls remotely. Washington Fruit uses Central Washington Refrigeration (CWR) as their maintenance and repair contractor for the refrigeration system.

The refrigeration process uses anhydrous ammonia as a refrigerant. The refrigeration system maximum inventory is 17,000 pounds of anhydrous ammonia. The facility has a single engine room containing five ammonia compressors. The facility is not designated as a first responder and relies on the Union Gap Fire Department for ammonia release response. There is restricted access to authorized employees, management personnel, and contractors. There are twenty-eight full-time non-union employees and four process operators on site.

**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:** Washington Fruit provided their 2011 and 2016 PHA. No unresolved findings and recommendations were identified, and the facility is conducting PHAs at least every five years as required by 40 CFR 68.67(f).
2. **Compliance Audit:** Washington Fruit provided their 2015 and 2018 Compliance Audit Reports. No unresolved findings were identified, and the facility is conducting a compliance audit at least every three years as required by 40 CFR 68.79(c).
3. **Training:** Washington Fruit provided training documentation for their operators indicating that they are performing initial and refresher training as required by 40 CFR 68.71.

**AREAS OF CONCERNS:**

1. **Tier II Reporting Requirements:** Washington Fruit did not submit a Tier II Report to the local fire department. When queried for the reason, the facility representative (Shane Tillett) stated that the fire department was not interested in receiving a copy. Mr. Tillett further stated that he did submit a Tier II Report to the LEPC, but did not provide any evidence.
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 documentation was 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:

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Signature

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Date

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RMP Coordinator/Approval

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Date

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EPCRA Coordinator/Approval

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Date

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Land Enforcement Section Chief/Approval

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Date