



U.S. Environmental Protection Agency
Region 6
1445 Ross Ave., Suite 1200
Dallas, TX 75202-2733

NOTICE OF INSPECTION

REASON FOR INSPECTION: This inspection is for the purpose of determining compliance with Section 112(r)(7) accidental release prevention requirements of the Clean Air Act, as amended 1990. The scope of this inspection may include, but is not limited to: reviewing and obtaining copies of documents and records; interviews and taking of statements; reviewing of chemical storage, handling, processing, and use; taking samples and photographs; and any other inspection activities necessary to determine compliance with the Act.

Facility Name:	Daisy Brand	☒ Private	☐ Government/Municipal
Mailing Address:		# of Employees: 198	Population Served: 0
Physical Address:	3636 LEON RD Garland, TX 75041	Latitude: 32.873855	Longitude: -96.660823
E-Mail Address:	tmendenhall@daisybrand.com	Inspection Start Date and Time:	December 12, 2018 at 09:00 AM
Responsible Official, Title, Phone Number:	Mr. Toby Mendenhall, Plant Engineering Manager, (972) 271-8260 x4793	Inspection End Date and Time:	December 12, 2018 at 03:30 PM
Facility Representative(s), Title(s), Phone Number(s):	Mr. Ben Rich, Facilities Manager, (972) 840-4861 Ms. Kristina Lawson, Plant Manager, (972) 271-8260 x4770 Mr. Bryan Martin, Maintenance Manager, (972) 840-8470	EPA Facility ID#:	1000 0022 2706
Inspector Report Reviewer Signature	<i>Althea C. Foster</i>	Inspector Name(s), Title(s), Phone Number(s):	John Fierro, RMP Inspector (214) 665-2148
Date	2/29/2019	Inspector Signature	<i>John Fierro</i>
		Date	February 20, 2018

Inspection Findings

IS FACILITY SUBJECT TO RMP REGULATION (40 CFR 68)?

☒ Y ☐ N

DID FACILITY SUBMIT (AND UPDATE) AN RMP AS PROVIDED IN 68.150 TO 68.185?

☒ Y ☐ N

DATE INITIAL RMP FILED WITH EPA: 11/7/2013

DATE OF LATEST RMP: 1/16/2016

1) PROCESS/NAICS CODE:	Dairy Product Manufacturing (except Frozen)31151	PROGRAM LEVEL:	1 ☐ 2 ☐ 3 ☒
REGULATED SUBSTANCE:	Ammonia (anhydrous)	MAXIMUM QUANTITY IN PROCESS:	30,395 (lbs)
2) PROCESS/NAICS CODE:		PROGRAM LEVEL:	1 ☐ 2 ☐ 3 ☐
REGULATED SUBSTANCE:		MAXIMUM QUANTITY IN PROCESS:	(lbs)
3) PROCESS/NAICS CODE:		PROGRAM LEVEL:	1 ☐ 2 ☐ 3 ☐
REGULATED SUBSTANCE:		MAXIMUM QUANTITY IN PROCESS:	(lbs)
4) PROCESS/NAICS CODE:		PROGRAM LEVEL:	1 ☐ 2 ☐ 3 ☐
REGULATED SUBSTANCE:		MAXIMUM QUANTITY IN PROCESS:	(lbs)
5) PROCESS/NAICS CODE:		PROGRAM LEVEL:	1 ☐ 2 ☐ 3 ☐
REGULATED SUBSTANCE:		MAXIMUM QUANTITY IN PROCESS:	(lbs)

DID THE FACILITY CORRECTLY ASSIGN PROGRAM LEVELS TO PROCESSES?

☒ Y ☐ N

ATTACHED CHECKLIST(S):

☐ PROGRAM LEVEL 1 CHECKLIST

☐ PROGRAM LEVEL 2 CHECKLIST

☒ PROGRAM LEVEL 3 CHECKLIST

OTHER ATTACHMENTS:

COMMENTS:

Did the employees have representation present during the inspection?

☐ Y ☐ N

Employee Participants:

Does facility meet EPA's "High-Risk" criteria? (large population within WCS, accident history, large quantity of regulated substances)?

☐ Y ☒ N
☒ Y ☐ N ☐ N/A

Is the facility current with its EPCRA Tier 2 reporting? Tier two report on file.

Has the facility reported all CERCLA releases in a timely manner?

☐ Y ☐ N ☒ N/A

INSPECTION SYMBOL KEY: Y - YES, N - NO, N/A - NOT APPLICABLE, S - SATISFACTORY, M - MARGINAL, U - UNSATISFACTORY