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:	Chelan Fruit Cooperative - Okanogan Facility
Physical Address:	124 S Van Duyn Ave, Okanogan, WA 98840
Phone Number:	509-682-2591
Latitude/Longitude:	48.213760 / -119.344125
RMP Facility ID#	100000180127
FRS ID#:	110012799999
EJ Concerns:	Yes (Above 80%)

CONTACT INFORMATION (RMP Implementation):

Name:	Ed Johnson
Phone Number:	509-630-8234
E-mail:	edj@chelanfruit.com

EMERGENCY CONTACT INFORMATION:

Name:	John Slater
Phone (24-hr):	509-630-8234
E-mail:	johns@chelanfruit.com

TRIP DETAILS:

Inspection Date:	May 25, 2022
Inspection Time:	0915 through 1030
EPA Inspection Team:	Terry Garcia, US EPA Region 10 SEE Grantee, Lead RMP Inspector Peter Phillips, US EPA Region 10 SEE Grantee, RMP Inspector Edward Johannes, US EPA Region 10 SEE Grantee, RMP Inspector Lisa Graves, Weston Solutions, Inc., EPA START Contractor

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date:	October 8, 2002
Date of Latest Update:	August 17, 2018

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)
1000090382	Fruit Packing and Storage	1000112972	31142, 31199	3	Ammonia, Anhydrous (7664-41-7)	23,827

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 ☐
If Yes, Permit Number:

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:

EPCRA TIER II REPORTING:
Did the facility submit the 2022 Tier II report to the SERC? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: 3/14/2022

Did the facility submit a Tier II to the LEPC and local fire department? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: 3/14/2022

INSPECTION ENTRY:
Terry Garcia led the inspection entry. The EPA Inspection Team (EPA) met with facility representative John Slater at the Chelan Fruit Cooperative Okanogan facility in Okanogan, Washington. EPA arrived at the facility at 0915 hours, and completed the document review at the Chelan Fruit Cooperative Chelan office afterwards. The inspection team was joined by the following facility personnel:

Name	Title
John Slater	Refrigeration Manager, Chelan Fruit Cooperative
Mike Davis	Ammonia Compliance Consulting, Inc.
Carol Davis	Ammonia Compliance Consulting, Inc.

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

The facility is a first responder: No ☒ Yes ☐
If No, Responding Agency: Okanogan County Fire (No Hazmat). Yakima Fire is closest Hazmat team (3 hours away).

EPA requested an explanation of the facility's operations and any additional safety measures that should be taken during the site tour. John Slater gave a brief description of the facility, operations, and personal protective equipment required for the tour. At 1330 hours the inspection team continued the RMP inspection for the Okanogan facility at the Chelan office. The team was escorted to a conference room located in the facility's office building. Inspector Terry Garcia, reiterated the risk management program

(RMP) and explained the purpose of the visit. Each team member presented his/her credentials.

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 ☐

An employee representative present during the facility visit: No ☐ Yes ☒
If Yes, Name/Title: John Slater, Refrigeration Manager

GENERAL INFORMATION:
The facility is regulated under the Risk Management Program as a Program Level 3 facility and is owned and operated by Chelan Fruit Cooperative. The Chelan Fruit Cooperative Okanogan Facility is in the City of Okanogan, Okanogan County, Washington. The facility operates as a produce packing and refrigeration warehouse and utilizes an ammonia refrigeration system. The refrigeration system uses and stores 23,827 lbs. of anhydrous ammonia on site. There are three full-time employees on site, one of whom is responsible for the oversight of refrigeration operations.

The ammonia refrigeration system is supported by four engine rooms which provide cooling to the facility's 26 controlled atmosphere (CA) rooms confirmed by Mr. Slater. A refrigeration operator checks the ammonia refrigeration system every workday and refrigerated areas are continuously monitored by an ammonia detection system. The facility has established an Emergency Action Plan (EAP) in the event of an ammonia release, and facility employees receive training on the EAP.

ON-SITE OBSERVATIONS:
The facility tour was conducted from approximately 0915 hours to 1030 hours. The EPA Inspection Team (EPA) was escorted by facility representatives John Slater and Mike Davis. EPA observed the facility's four engine rooms (Engine Room B, Engine Room C, Engine Room F, and Engine Room G), controlled atmosphere room CA 10, and refrigeration system components at exterior areas of the facility near Buildings 8, 11, 12, and 17.

Engine Room B is located inside facility Building 8. The primary refrigeration system equipment observed in Engine Room B includes two compressors, ammonia piping, and multiple pressure relief valves (Photos 1-7). Screened window openings in the Engine Room B access door serve as the air intake (Photos 8 and 9) and EPA observed no exhaust for Engine Room B. Safety features for Engine Room B include an outside emergency shut-off switch panel (Photo 1), an ammonia leak detection device (Photo 5), and a bottle eye wash station (Photo 10). EPA observed the Engine Room B ammonia leak detector calibration record (Photo 11). The high-pressure receiver (HPR) tank and associated king valve (Photos 12 and 13), and pressure relief valves at exterior of Building 8 (Photos 14 and 15). Three (3) condensers are located directly outside of the Engine Room B at the exterior of Building 8 (Photo16). Engine Room B pressure relief valve at exterior of Building 8 with a replacement due date of July 2021 was observed (Photo 14). EPA observed Common Room Storage 6.

Engine Room C is in Building 12 (Photo 17). The primary equipment observed in Engine Room C includes two HPR tanks and associated king valves (Photos 19, 22, 23, 29 and 30), three compressors (Photos 19 and 21), multiple equipment regulator valves (Photos 19, 20, 22 and 24), and a nitrogen generator (Photo 28). A second HPR tank in Engine Room C allows for an ammonia overflow (Photo

29). The safety features for Engine Room C included an outside emergency shut-off switch panel (Photo 18), an indoor emergency eye wash station (Photo 27), and an ammonia leak detection device (Photo 25). EPA observed ammonia detection device calibration records for Engine Room C. The Engine Room C access door serves as the air intake (Photo 19 and 31) and an exhaust vent is at the ceiling (Photo 26). Condensers for Engine Room C are located at the exterior of Building 12 (Photo 33). EPA observed that directional labels to be missing on interior and exterior ammonia supply lines at Engine Room C (Photo 32). Windsocks were not present at Building 12. Engine Room C access door (Entry/Exit door) is not self-closing, nor is it equipped with panic hardware as required by industry standard (Photo 31).

Engine Room F is in Building Common Storage (CS) 2 (Photo 34). The primary equipment observed in Engine Room F includes one HPR tank and associated king valve (Photo 36), two compressors, and multiple pressure relief valves (Photos 38, 41 and 42). Screened windows serve as the air intake for the room (Photo 43), a wall-mounted fan draws air across the room (Photo 40), and an exhaust vent is in the ceiling (Photo 42). Safety features for Engine Room F include an outside emergency shut-off switch panel (Photo 35), an indoor emergency eye wash station (Photo 37), and an ammonia sensor cell and panel (Photo 39). The condenser for Engine Room F is located on the building rooftop (Photo 43). EPA observed that refrigeration piping in Engine Room F was missing directional labels on the supply lines. Building CS-2 has a total of two CA rooms.

Engine Room G is in Building 17 (Photos 44 and 46). The primary equipment observed in Engine Room G consists of an HPR tank and associated king valve (Photo 47 and 48), three compressors (Photos 49 and 50), multiple pressure relief valves (Photos 51 and 52), and roof-mounted condensers (Photo 53). Engine Room G includes an air intake (Photo 54) and an exhaust vent (Photo 55). Safety features for Engine Room G include an outside emergency shut-off switch panel (Photo 45), an indoor emergency eye wash station (Photo 56), a binder of Safety Data Sheets (Photo 57), and an ammonia leak detection device (Photo 58). EPA observed the leak detection device calibration record (Photo 59).

EPA observed the controlled atmosphere (CA) room (CA 10 in Building 11) and the evaporators (Photo 62), and the ammonia sensor intake (Photo 63). EPA observed a corroded ammonia line outside of Building 11 with visibly damaged vapor barrier/insulation (Photo 64).

Photographs are included in Attachment A to this report.

After touring the RMP-covered process areas at the facility, the inspection team continued the RMP documentation inspection at Chelan Fruit Cooperative, in the Chelan office. Upon completion of the document review, EPA provided a debriefing to John Slater, Mike Davis, and Carol Davis.

INFORMATION COLLECTED FROM FACILITY:

1. Contractor Mailing List - 1 page
2. PSM correspondence to North Valley Mechanical contractor - 2 pages
3. 2019 Compliance Audit Team Log - 1 page
4. Jeff Walter, Certificate of Completion - 1 page
5. Chelan Fruit Cooperative Okanogan Facility Site Map - 1 page
6. Ventilation Calculations Worksheet - 3 pages
7. Total Ammonia Inventory Worksheet - 4 pages
8. 2022 Operator Standard Operating Procedures Audit Log - 1 page
9. Employee Standard Operating Procedures Training Log - 1 page

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

1. The Chelan Fruit Cooperative Okanogan facility ventilation system design is inadequate in Engine Room B. [68.65(d)(1)(v)]; and has not documented that equipment complies with recognized and generally accepted good engineering practices. [68.65(d)(2)]. For example, during the facility tour EPA observed no labels identifying pipes containing ammonia and engine room entry/exit doors not self-closing.

2. The Chelan Fruit Cooperative Okanogan facility has not established a system to promptly address 2018 PHA findings/recommendations, assure recommendations are resolved in a timely manner and documented, document actions to be taken, complete actions as soon as possible, develop a written schedule of when actions are to be completed and communicate the actions to employees whose work assignments may be affected by the recommendations. [68.67(e)]; the 2018 PHA has not been revalidated by a team after the previous 2013 PHA to assure that the PHA is consistent with the current process. [68.67(f)]; and the facility has not updated 2013 and 2018 PHA resolution of recommendations for the life of the process [68.67(g)].

3. The Chelan Fruit Cooperative Okanogan facility did not provide initial training documentation for John Slater (hired in 2006) and Jeff Walter (hired in 2004). The documents provided displayed discrepancies as to actual dates.

4. The Chelan Fruit Cooperative Okanogan facility provided a grandfather certificate in lieu of initial training for two operators, John Slater and Jeff Walter signed by the plant manager, Mike Davis, in 2013. The certificates were not signed by the operators. The certificates did not certify in writing that the employee has the required knowledge, skills, and abilities to safely carry out the duties and responsibilities as specified in the operating procedures. The documents provided displayed discrepancies as to actual dates and no signatures of operators.

5. The Chelan Fruit Cooperative Okanogan facility did not provide refresher training documentation for John Slater (hired in 2006) and Jeff Walter (hired in 2004). The documents provided displayed discrepancies as to actual dates.

6. The Chelan Fruit Cooperative Okanogan facility did not provide training documentation for John Slater and Jeff Walter involved in maintaining the on-going integrity of refrigeration process equipment [68.73(c)].

7. The Chelan Fruit Cooperative Okanogan facility inspection and testing procedures for process equipment such as ventilation system (Engine Room B, Engine Room C, Engine Room F, and Engine Room G) did not follow recognized and generally accepted good engineering practices (RAGAGEP). [68.73(d)(2)]. The inspection and testing procedures did not follow industry standards (i.e., IIAR) for testing the emergency ventilation system annually. EPA observed overdue dates on pressure relief valve (PRV) for replacement such as PRVs for Engine Room B exterior of Building 8 (Photo 14).

8. The Chelan Fruit Cooperative Okanogan facility did not correct deficiencies in equipment such as improperly sized ventilation system design (Engine Room B) and corroded pipes (outside Building 11) that were outside acceptable limits defined by the process safety information before further use or in a timely manner to assure safe operation [68.73(e)].

9. The Chelan Fruit Cooperative Okanogan facility 2019 and 2022 Compliance Audits did not adequately identify deficiencies and document findings that were observed at the time of the inspection. [68.79(a) and (c)]. For example, deficiencies such as the PHA, ventilation system design, mechanical integrity, RAGAGEP, and Operator training.

10. The Chelan Fruit Cooperative Okanogan facility did not provide documentation that shows they obtained and evaluated information regarding the contract owner's or operator's safety performance and programs for contractors such as Shifflett's, Empire Controls and Schmitt Electric [68.87(b)(1) and (5)].

11. The Chelan Fruit Cooperative Okanogan facility RMP dated August 17, 2018 in Section 7, Program Level 3, did not identify Major Hazards such fire, flooding and earthquakes which are natural hazards in the geographic area where the facility is located.

DOCUMENTS REQUESTED NOT INCLUDED IN REPORT:

The following documents were requested during the inspection but are not included in this report. These documents will still be reviewed to determine compliance with Section 112(r) of the Clean Air Act.

1. Compliance Audit Findings for 2016, 2019, and 2022. Provided via email 5/13/2022.
2. Bid for corroded pipe and compromised insulation outside Building 12, Engine Room C.
3. Schedule for all engine rooms (B, C, F, and G) ventilation system design.
4. Last Mechanical Integrity Audit & Tracking of findings requested.

Okanogan facility provided the following documents:

- Bid for repair of corroded pipe and damaged insulation outside Building 12, Engine Room C.
- Schedule for all engine rooms (B, C, F, and G) ventilation system design.
- Certificate of Completion for John Slater.
- Facility provided documents dated 6/15/2022 for order of ventilation system parts.
- Ammonia refrigeration safety inspection checklists dated 11/22 and 11/23/2021.

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: 2022.11.15 06:50:47 -08'00'

Inspector Signature

JAVIER MORALES Digitally signed by JAVIER MORALES Date: 2022.11.15 08:21:56 -08'00'

RMP Coordinator/Approval

ERIN WILLIAMS Digitally signed by ERIN WILLIAMS Date: 2022.11.15 13:21:59 -08'00'

EPCRA Coordinator/Approval

Jennifer A Sullivan

Digitally signed by Jennifer A Sullivan
Date: 2022.11.16 09:37:17 -08'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: Chelan Fruit Coop - Okanagan
City, State: Okanagan, Washington
Photographer: Lisa Graves

File	Photo Layout ID	Date	Time	Description
DSCN2516	1	5/25/2022	9:32 AM	Engine Room B - Entry/Exit, Emergency Shut Off
DSCN2508	2	5/25/2022	9:26 AM	Engine Room B - Overview
DSCN2497	3	5/25/2022	9:22 AM	Engine Room B - Compressor
DSCN2499	4	5/25/2022	9:23 AM	Engine Room B - Pressure Relief Valve
DSCN2494	5	5/25/2022	9:21 AM	Engine Room B - Ammonia Leak Detector
DSCN2498	6	5/25/2022	9:22 AM	Engine Room B - Ammonia Lines
DSCN2495	7	5/25/2022	9:21 AM	Engine Room B - Access Door and Ammonia Lines
DSCN2506	8	5/25/2022	9:26 AM	Engine Room B - Intake (from door)
DSCN2507	9	5/25/2022	9:26 AM	Engine Room B - Intake (from door)
DSCN2496	10	5/25/2022	9:22 AM	Engine Room B - Bottle Eye Wash Station
DSCN2500	11	5/25/2022	9:24 AM	Engine Room B - Ammonia Detector Calibration Records
DSCN2511	12	5/25/2022	9:28 AM	Engine Room B - High Pressure Receiver (HPR) Tank at Exterior of Building 8
DSCN2510	13	5/25/2022	9:28 AM	Engine Room B - King Valve at Exterior of Building 8
DSCN2514	14	5/25/2022	9:30 AM	Engine Room B Pressure Relief Valves at Exterior of Building 8
DSCN2513	15	5/25/2022	9:29 AM	Engine Room B Pressure Relief Valves at Exterior of Building 8
DSCN2512	16	5/25/2022	9:28 AM	Engine Room B - Condensers at Exterior of Building 8
DSCN2527	17	5/25/2022	9:52 AM	Engine Room C - Entry/Exit
DSCN2528	18	5/25/2022	9:52 AM	Engine Room C - Emergency Shut Off
DSCN2531	19	5/25/2022	9:54 AM	Engine Room C - Overview
DSCN2534	20	5/25/2022	9:55 AM	Engine Room C - Pressure Relief Valve Tag
DSCN2535	21	5/25/2022	9:56 AM	Engine Room C - Overview
DSCN2537	22	5/25/2022	9:57 AM	Engine Room C - HPR Tank
DSCN2536	23	5/25/2022	9:56 AM	Engine Room C - King Valve
DSCN2538	24	5/25/2022	9:57 AM	Engine Room C - Pressure Relief Valve Tags
DSCN2530	25	5/25/2022	9:54 AM	Engine Room C - Ammonia Leak Detector
DSCN2532	26	5/25/2022	9:54 AM	Engine Room C - Exhaust Vent
DSCN2533	27	5/25/2022	9:55 AM	Engine Room C - Emergency Shower and Eye Wash
DSCN2542	28	5/25/2022	10:00 AM	Engine Room C - Nitrogen Generator

File	Photo Layout ID	Date	Time	Description
DSCN2540	29	5/25/2022	9:59 AM	Engine Room C - HPR Tank for Overflow
DSCN2541	30	5/25/2022	10:00 AM	Engine Room C - King Valve
DSCN2539	31	5/25/2022	9:58 AM	Engine Room C - Intake at Access Door
DSCN2543	32	5/25/2022	10:01 AM	Building 12 - Sections of New Ammonia Line
DSCN2545	33	5/25/2022	10:01 AM	Engine Room C Condensers at Building 12 Exterior
DSCN2551	34	5/25/2022	10:08 AM	Engine Room F - Entry/Exit
DSCN2552	35	5/25/2022	10:08 AM	Engine Room F - Emergency Shut Off
DSCN2553	36	5/25/2022	10:09 AM	Engine Room F - HPR Tank
DSCN2554	37	5/25/2022	10:09 AM	Engine Room F - Emergency Shower and Eye Wash
DSCN2555	38	5/25/2022	10:10 AM	Engine Room F - Pressure Relief Valve Tags
DSCN2556	39	5/25/2022	10:10 AM	Engine Room F - Ammonia Sensor Cell and Panel
DSCN2557	40	5/25/2022	10:10 AM	Engine Room F - Wall Mounted Fan
DSCN2558	41	5/25/2022	10:11 AM	Engine Room F - Pressure Relief Valve Tag
DSCN2559	42	5/25/2022	10:12 AM	Engine Room F - Ceiling Exhaust Vent
DSCN2561	43	5/25/2022	10:13 AM	Engine Room F - Intake Windows and Rooftop Condenser
DSCN2562	44	5/25/2022	10:16 AM	Engine Room G - Emergency Shut Off Intake
DSCN2563	45	5/25/2022	10:16 AM	Engine Room G - Emergency Shut Off
DSCN2565	46	5/25/2022	10:16 AM	Engine Room G - Entry/Exit
DSCN2573	47	5/25/2022	10:18 AM	Engine Room G - HPR Tank
DSCN2572	48	5/25/2022	10:18 AM	Engine Room G - King Valve
DSCN2566	49	5/25/2022	10:17 AM	Engine Room G - Compressor
DSCN2578	50	5/25/2022	10:21 AM	Engine Room G - Compressors
DSCN2574	51	5/25/2022	10:19 AM	Engine Room G - Pressure Relief Valves
DSCN2576	52	5/25/2022	10:21 AM	Engine Room G - Pressure Relief Valves
DSCN2579	53	5/25/2022	10:23 AM	Engine Room G - Condenser
DSCN2575	54	5/25/2022	10:19 AM	Engine Room G - Louvered Intake
DSCN2567	55	5/25/2022	10:17 AM	Engine Room G - Exhaust Vent
DSCN2568	56	5/25/2022	10:17 AM	Engine Room G - Emergency Shower and Eye Wash
DSCN2571	57	5/25/2022	10:18 AM	Engine Room G - Safety Data Sheet Binder
DSCN2569	58	5/25/2022	10:17 AM	Engine Room G - Ammonia Leak Detector
DSCN2570	59	5/25/2022	10:18 AM	Engine Room G - Ammonia Leak Detector Calibration Records
DSCN2524	60	5/25/2022	9:46 AM	CA 10 - Entry/Exit
DSCN2523	61	5/25/2022	9:46 AM	CA 10 - Storage Area

File	Photo Layout ID	Date	Time	Description
DSCN2522	62	5/25/2022	9:45 AM	CA 10 - Evaporators
DSCN2520	63	5/25/2022	9:45 AM	CA 10 - Ammonia Sensor Intake
DSCN2525	64	5/25/2022	9:48 AM	Building 11 -Ammonia Line (Corroded)