



**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: Silver Bay Seafoods, LLC
Physical Address: 4400 Sawmill Creek Road, Suite B, Sitka, AK 99835
Phone Number: (907) 747-7996
Latitude/Longitude: 57.044886 / -135.231403
RMP Facility ID#: 1000 0021 8052
FRS ID#: 110057702669
EJ Concerns: No (Below 80%)

CONTACT INFORMATION (RMP Implementation):

Name: Mike Duckwork, Jr., Plant Manager
Phone Number: (907) 747-7996
E-mail: mikejr.duckworth@silverbayseafoods.com

EMERGENCY CONTACT INFORMATION:

Name: Todd Zey, Director of Safety
Phone (24-hr): (206) 992-7573
E-mail: todd.zey@silverbayseafoods.com
Website: www.silverbayseafoods.com

TRIP DETAILS:

Inspection Date: September 21, 2022
Inspection Time: 09:00 through 13:00
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
Mike Wolski, Weston Solutions, Inc., EPA START Contractor

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: April 17, 2015
Date of Latest Update: June 19, 2020

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.)
1000109789	Refrigeration, seafood processing	1000137131	000111082	3	Ammonia, Anhydrous (7664-41-7)	14,500

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 2021 Tier II report to the SERC? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: February 23, 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: February 23, 2022, Sitka Fire Department and LEPC, Al Smith, previously Asst. Fire Chief City of Sitka

INSPECTION ENTRY:

Terry Garcia led the inspection entry. The EPA Inspection Team (EPA) was escorted to a meeting room at the Silver Bay Seafood facility in Sitka, Alaska. EPA arrived at the facility at 09:00 and was joined by the following facility personnel:

Name	Title
Raja Hamer	Chief Engineer
Daryl Fabionor	Safety Coordinator
Todd Zey	Director of Safety
Michael Duckworth Jr.	Plant Manager
Josh Johnson	QA Manager
Aaron Jones	Head of Refrigeration

Was a state/county/or local emergency representative present? No ☐ Yes ☒
If Yes, Name and Title of Representative: Kathy Shea, Alaska Department of Environmental Conservation

The facility is a first responder: No ☐ Yes ☒
If No, Responding Agency: Sitka Fire Department (unified command with Silver Bay Seafoods)

Facility representatives escorted EPA personnel to a conference room located upstairs in the facility's office. Lead Inspector Terry Garcia, provided a summary of the Risk Management Program (RMP), and explained the purpose of the visit. Each EPA Inspector showed their credential and all parties present introduced themselves.

EPA then requested an explanation of the facility's operations and any additional safety measures that should be taken during the site tour. Facility representatives Raja Hamer, Aaron Jones, Daryl Fabionor, and others listed on the sign in sheet gave a brief description of the facility, operations, and personal protective equipment required for the tour, and evacuation alarms and routes.

Prior to the inspection, EPA sent an email 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: Raja Hammer Chief Engineer.

GENERAL INFORMATION:

The Silver Bay Seafoods Sitka Facility (SBS) is regulated under RMP as a Program Level 3 facility, owned and operated by Silver Bay Seafoods, LLC. The facility processes seafood such as salmon, herring, black cod, and fish roe and utilizes two anhydrous ammonia refrigeration systems to preserve the seafood product.

The building was originally part of the Sitka Pulp Mill built around 1959 and was updated as a seafood processing facility in 2007. Updates in 2007 included the addition of an anhydrous ammonia refrigeration system and Engine Room 1, three ice makers, and two blast tunnel freezers. Further updates in 2011 and 2015 added an additional cannery operation, the Egg House with seven plate freezers, and a spray chiller. This necessitated the addition of a separate anhydrous ammonia refrigeration system and additional Engine Room 2. The two engine rooms are designated as Engine Room 1 and Engine Room 2. The refrigeration system in Engine Room 1 utilizes 7,000 lbs. of anhydrous ammonia and falls below the threshold to be subject to RMP regulations. The refrigeration system in Engine Room 2 utilizes 14,000 lbs. of anhydrous ammonia and is subject to RMP regulations. For consistency and thoroughness both systems are included in this report.

Staffing peaks at up to 400 people starting at the end of July. The facility ceases operations during the winter months, necessitating that the operators drain and winterize the building prior to performing a full shut down of the facility. Alarms and sensors continue to function while the facility is closed during the winter.

Prior to the EPA visit, Silver Bay Seafoods provided a link to the SBS Essential Visitor Request Form. The survey was required due to COVID 19 protocols in place at the site. All EPA inspectors/contractors and external state representatives completed this online document. The form took approximately five minutes to complete. Visitors were required to be approved prior to scheduling trip in accordance with SBS COVID plan and complied with the facility requirement.

ON-SITE OBSERVATIONS:

EPA toured the facility from approximately 0945 hours to 1045 hours, escorted by facility representatives Todd Zey, Raja Hamer, Daryle Fabionor, Josh Johnson, Aaron Jones. Kathy Shea with Alaska Department of Environmental Conservation (ADEC) accompanied EPA. Seafood processing operations were not occurring at the time of inspection. EPA observed Engine Room 1, Engine Room 2, the Egg House, Tier II chemical storage and other exterior areas of the facility including Emergency Response Trailer.

The refrigeration system in Engine Room 1 (ER1) utilizes 7,000 lbs. of anhydrous ammonia and is only accessible thru a locked door by authorized personnel (Photo 1). Safety features observed in Engine Room 1 include National Fire Protection Association (NFPA) placarding, ammonia alarms, an eye wash station, a lockout/tagout station (Photos 1 to 3). There are four screw compressors (Photo 4), each with a pressure relief valve labeled with the last replacement date of April 2021 (Photos 5 and 6). The ventilation system includes two rooftop inlet vents and four discharge vents (Photos 7 and 8). EPA observed one high pressure receiver (HPR) tank and associated king valves and a low-pressure receiver tank (LPR) (Photos 9, 10, and 12). Footpaths were marked on the facility floor of Engine Room 1 to guide responders to the location of the system king valves (Photo 11). EPA also observed the ammonia detection sensors (Photo 13) and ammonia supply/return piping supporting the tunnel freezer in Engine Room 1 (Photo 14). EPA observed newer ER1 insulation and facility stated ER1 insulation was replaced June 4, 2021. Newer insulation and directional labeling was observed throughout ER1 (Photos 8 to 10).

EPA inspected the Egg House where the facility handles roe. Refrigeration system components observed in the Egg House include ammonia piping between the Egg House and Engine Room 2 (Photos 15 and 16), seven plate freezers (Photo 17), ammonia sensors (Photo 18), a system emergency stop (Photo 19), and an ammonia audio alarm (Photo 20). Ammonia piping in this area passes low temperature recirculated liquid through three ice machines, seven plate freezers, and a blast tunnel freezer with eleven evaporators.

EPA observed two 40-ton ice makers and one 90-ton ice maker at the facility, located at an external mezzanine at the facility (Photos 22 and 23).

EPA observed four windsocks in good condition mounted to the facility roof (Photo 21).

The refrigeration system associated with Engine Room 2 (ER2) has approximately 14,000 lbs. of anhydrous ammonia, and accessible only by authorized personnel thru a locked door (Photo 25). Safety features observed during inspection of Engine Room 2 include NFPA placarding on entrance doors (Photos 24 and 25), two emergency eye wash stations (Photos 26 and 28), and an emergency control area with shunt trip and fan switches (Photo 27), and ammonia audio alarms. EPA inspected Engine Room 2 refrigeration system components which include two electric-driven compressors (Photo 29), two diesel-driven compressors (Photo 30), one LPR tank (Photo 31), condensers, a sub cooler, ammonia piping insulated in closed-cell sponge rubber (Photo 32), an HPR tank with associated king valves (Photos 33 to 36), and ammonia sensors (Photo 37). Service tags on pressure relief valves on the

compressors in Engine Room 2 were dated May 2021 (Photo 36). The ventilation system in Engine Room 2 includes four outlet vents (Photos 38 and 39) and three inlet vents (Photo 40). A control panel in Engine Room 2 controls the refrigeration system, and oil maintenance is logged and managed on hardcopy forms (Photo 41). Some lengths of ammonia piping in Engine Room 2 are covered in Rubatex (closed-cell sponge rubber insulation). According to facility personnel the Rubatex is due for replacement in 2023 (Photo 42). Ventilation system design was under review at the time of inspection and an engineering firm was contacted by SBS for a full assessment of both engine rooms.

EPA observed other exterior areas of the facility, including a spray chiller (Photos 43 to 45), an 8,000 lb. double-walled diesel tank subject to EPCRA rule (Photo 46), and a response trailer with hazardous material spill response and mitigation supplies (Photos 47 and 48). EPA observed the decon/containment pool inside the trailer was cracked and in need of replacement. The facility is a first responder and has documented drill records with local responders going back to 2017. SOP Training and Respirator and Fit test is provided for all operators. EPA observed a library of Safety Data Sheets (SDS) for chemicals at the facility (Photo 49).

Silver Bay Seafoods has identified other Major Hazards (Tsunami) in their RMP, and training drills and that the facility would be impacted by the failure of the dam holding back the nearby Blue Lake Reservoir. A map located at a trailhead above the facility depicts evacuation routes and muster areas for the area (Photo 50). Additionally, the last evacuation exercise conducted by the facility took place on June 15, 2022, documented that entire facility and the City of Sitka Fire and FERC were involved.

Photographs taken during the inspection are included in Attachment A to this report.

After touring the RMP-covered process areas at the facility, EPA team and others returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to Raja Hamer, Todd Zey, Michael Duckworth Sr, Josh Johnson, Aaron Jones, with Kathy Shea of ADEC present.

INFORMATION COLLECTED FROM FACILITY:

1. Hazwoper 8-hour refresher record of safety training dated July 4, 2022 (first page)
2. Hazwoper 8-hour refresher record of safety training dated July 4, 2022 (second page, different staff trained)
3. SOP training dated September 21, 2022, provided for all operators.
4. Silver Bay Seafoods PSM compliance audit report/recommendations 2017
5. Proposal by McCown Crafted, Inc to replace Rubatex closed-cell sponge rubber insulation
6. System #1 (engine room 1) block flow diagram
7. System #2 (engine room 2) block flow diagram
8. NH3 sensor and alarm locations
9. Evacuation map illustrates muster areas for Dam Failure
10. System 1 (engine room 1) ammonia relief discharge pressure drop summary
11. System 2 (engine room 2) ammonia relief discharge pressure drop summary

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

1. The ventilation system design documentation was not available for Engine Room 2. [68.65(d)(1)(vi)].
2. The 2017 Compliance Audit identified the Rubatex insulation for ammonia piping in Engine Room 2 (ER2) as an unresolved finding, Item #57. The owner or operator shall promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected as required [68.79(d)]. This 2017 Compliance Audit finding was a carry over to the current 2020 Compliance Audit which remained open as a finding at the time of inspection. The facility has scheduled to replace ER2 Rubatex insulation in January 2023.
3. The 2022 PHA was not completed at the time of inspection and delayed due to contractor support issues. The PHA was a work is in progress at the time of the onsite inspection.
4. The decon/containment pool located inside the site's First Responder trailer was observed to be cracked and in need of replacement. This item has since been corrected.
5. The 2022 PHA Revalidation and Findings report identified eight (8) unresolved findings carried over from 2017 PHA and four (4) unresolved findings from the 2012 PHA. Silver Bay Seafoods has not promptly addressed their PHA findings and recommendations; assured that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete actions as soon as possible; develop a written schedule of when these actions are to be completed; communicate the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions. [68.67(e)]. For example, PHA findings Item A1 2017, Item A3 2017, Item B23 2017, Item A5 2012 and Item A9 2012.

DOCUMENTS REQUESTED NOT INCLUDED IN REPORT:

The following documents were requested during or after the inspection, included in this report. These documents will still be reviewed to determine compliance with Section 112(r) of the Clean Air Act.

1. Engineering design schedule for ventilation system.
2. Rubatex insulation replacement schedule.
3. 2022 PHA Revalidation (delayed due to contractor issues).
4. FEAP Functional Emergency Action Plan.
5. Silver Bay Seafoods - Sitka Emergency Plan Section 3 Evacuation Routes & Procedures.
6. Silver Bay Sitka Exit Plan.
7. Dam Failure Drill 6-15-2022 Report.
8. 2022 PHA Revalidation & Findings report submitted to EPA on November 16, 2022.
9. Compliance Audit Findings 2017 and 2020.

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: 2022.11.21 10:47:57 -08'00'

Inspector Signature

JAVIER MORALES

Digitally signed by JAVIER
MORALES

Date: 2022.11.21 11:23:34 -08'00'

RMP Coordinator/Approval

ERIN WILLIAMS

Digitally signed by ERIN WILLIAMS
Date: 2022.11.22 10:09:47 -08'00'

EPCRA Coordinator/Approval

Jennifer A Sullivan

Digitally signed by Jennifer A Sullivan
Date: 2022.11.22 10:35:11 -08'00'

Land Enforcement Section Chief/Approval