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:	Roche Fruit Co - Warehouse 9
Physical Address:	419 N 1st Ave, Yakima, WA 98902
Phone Number:	(509) 424-7200
Latitude/Longitude:	46.362876, -120.304463
RMP Facility ID#	100000106191
FRS ID#:	110071072987
EJ Concerns:	Yes (Above 80%)

CONTACT INFORMATION (RMP Implementation):

Name:	Steven Gonzalez
Phone Number:	(509) 307-3794
E-mail:	stevengonzalez@rochefruit.com

EMERGENCY CONTACT INFORMATION:

Name:	Steven Gonzalez
Phone (24-hr):	(509) 307-3794
E-mail:	stevengonzalez@rochefruit.com
Website:	https://rochefruit.com/

TRIP DETAILS:

Inspection Date: August 16, 2023
Inspection Time: 0900 hours through 1145 hours
EPA Inspection Team:

Edward Johannes, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Terry Garcia, US EPA Region 10 SEE Grantee, RMP Inspector
Peter Phillips, US EPA Region 10 SEE Grantee, RMP Inspector
Kenneth Valder, Weston Solutions, Inc., EPA START Contractor
Morgan Larimer, Weston Solutions, Inc., EPA START Contractor

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:
Initial Submission Date: June 21, 1999
Date of Latest Update: September 22, 2019

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)
1000103250	Refrigerated Warehouse and Storage	1000129252	49312	3	Ammonia, Anhydrous (7664-41-7)	20,000

PURPOSE:
The purpose of this inspection was to determine if this facility is in compliance with Section 112(r) of the Clean Air Act (CAA) 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 ☐
- 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:
Did the facility submit the 2022 Tier II report to the SERC? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: January 5, 2023

Did the facility submit a Tier II to the LEPC and local fire department? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: January 5, 2023

INSPECTION ENTRY:
The EPA Inspection Team, led by Edward Johannes, met with facility representatives at the Roche Fruit Co. facility in Yakima, WA. EPA arrived at the facility at 0900 hours and was joined by the following facility personnel:

Name	Title, Organization
Steven Gonzalez	PSM/RMP Coordinator, Roche Fruit Co.
Alfonso Pineda	General Manager, Roche Fruit Co.
Trent Fuller	Orchard Administrative Manager, Roche Fruit Co.
Rob Wickersham	Engineering, Central Washington Refrigeration

Was a state/county/or local emergency representative present? No ☒ Yes ☐
The facility is a first responder: No ☒ Yes ☐
If No, Responding Agency: Yakima Fire Department

Facility representatives escorted EPA to a conference room located in the facility's office building. Lead Inspector Edward Johannes, introduced all parties present, provided a summary of the Risk Management Program (RMP), and explained the purpose of the visit. Each EPA Inspector presented his/her credentials.

EPA then requested an explanation of the facility's operations and any additional safety measures that should be taken during the site tour. Alfonso Pineda gave a brief description of the facility, operations, and personal protective equipment required for the tour.

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 ☐

GENERAL INFORMATION:

The facility is regulated under RMP rule as a Program Level 3 refrigerated storage and warehousing facility owned and operated by Roche Fruit Company (Roche). Founded in 1918, they are a vertically integrated tree fruit company that farms, transfers, processes, and packages apples. Roche purchased the Warehouse 9 (facility) in 2014; its predecessors operated the facility from its construction in 1983. Apples are binned and placed into cold storage at the facility. The facility employs approximately 300 full-time, non-unionized employees on site, including two System Operators: Steven Gonzalez and Brad Holt. Employees operate in two shifts, the first from 0800 to 1700 hours and the second from 1600 to 0030 hours, Monday through Friday.

Contractors supporting the System Operators include Central Washington Refrigeration (CWR) (Yakima); Kapco LLC (Yakima); Specpoint Systems, LLC (Yakima); CH_2O, Inc. (Yakima); and Pacific CA Systems (Yakima).

The facility is permitted to use 23,540 pounds (lbs) of anhydrous ammonia in the on-site refrigeration system that maintains temperature-controlled atmospheres in five common storage areas. The refrigeration system consists of six ammonia compressors located in Engine Room 9 (ER-9). In addition, ER-9 contains a Control Pressure Receiver, Suction Accumulator, and Liquid Transfer Units (LTUs). Safety equipment in ER-9 includes ammonia sensors and alarms; emergency ventilation via a wall intake louver, and a ceiling exhaust fan; and an eyewash/shower station located immediately inside the entrance door. Atop ER-9 are four condensers, which are located adjacent to the High-Pressure Receiver (HPR) and Receiver Thermosyphon. Evaporative chillers are located in five cold storage rooms. The maximum amount of ammonia within the refrigeration system at any time is 14,000 lbs.

During the facility inspection, Roche representatives stated that no modifications to the refrigeration system have been made in the past 5 years; none are currently planned or underway.

ON-SITE OBSERVATIONS:
After the entry meeting, EPA toured the facility from approximately 0930 to 1000 hours, escorted by facility representatives Gonzalez and Pineda, as well as contractor representative Wickersham (CWR). The inspection team observed the engine room (ER-9) , condensers, and a controlled atmosphere rooms. Photos taken during the inspection are included in Attachment A to this report and are referenced below.

The tour began in the south end of ER-9, which is accessed at this location via an equipment roll-up door as well as a personnel door (Photo 1). An emergency shower/eyewash station is located immediately inside through the personnel doorway (Photo 2). One ammonia sensor is situated near the other personnel door (Photo 3); the daily inspection log binder is stored nearby (Photo 4). Facility representatives stated the ammonia sensor triggers audible and visual alarms at 50 parts per million (ppm) ammonia; the system autodials the operators at this alarm setpoint as well. If ammonia concentrations reach 150 ppm, the system engages ER-9 active ventilation and trips the equipment to safely shut down, also notifying the operators via autodial.

Inside ER-9 are the six compressors (Photo 5 and 6). The Control Pressure Receiver (CPR), Suction Accumulator, Defrost Tank, and LTUs are located against the east wall in ER-9. The inspection team reviewed pressure relief valves (PRV) installation tags associated with each of the compressor units (Photo 7). The team observed the location of the ceiling exhaust fan, and two louvered air intakes (Photo 8 and 9).

The EPA inspection team observed the high pressure receiver (HPR) and Receiver Thermosyphon (Photo 10) outside of ER-9. The team climbed up to the catwalks surrounding the condensers to observe them (Photo 11), and to obtain a better view of the ammonia piping in a pipe bridge over North First Avenue (Photo 12).

The EPA team observed the representative controlled atmosphere (CA) in Building 83. Facility representatives stated that there are 21 CA zones located in the building, each served by banks of evaporators (Photo 13 shows an example for Cold Storage 1 within Building 83).

After touring the RMP-covered process areas at the facility, EPA returned to the conference room at 1005 hours to review RMP documentation. Upon completion of the document review, EPA provided a debriefing to facility representatives Pineda and Gonzalez as well as operations contractor representative Wickersham.

INFORMATION COLLECTED FROM FACILITY:

1. Inspection Sign-in Sheet
2. Mechanical Integrity Audit September 25, 2019 Audit Findings
3. CWR Quote for Machinery Room Ventilation

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

1. The facility did not provide the required information defining the off-site impacts to a population from an ammonia release for their hazard assessment. [68.30(a)-(d)].
2. The facility did not provide the required information defining the off-site impacts to the environment from an ammonia release for their hazard assessment. [68.33(a), (b)].

3. The facility needs to review and update the off-site consequence analysis (OCA) at least once every five years. [68.36(a)]. The facility's hazard assessment documents were not dated.
4. Ventilation system design is currently not meeting codes and standards for normal and emergency ventilation in the engine room. [68.65(d)(1)(v)]. Roche's contractor Central Washington Refrigeration (CWR) provided a quote dated August 15, 2023, to upgrade the engine room ventilation system design to current IIAR standards [IIAR 6.14.3.5, 6.14.6.1, and 6.14.7.1].
5. The facility did not provide in the 2019 Process Hazard Analysis (PHA) that they had communicated the actions to operating, maintenance, and other employees whose work assignments are in the process and who may be affected by the recommendations. [68.67(e)].
6. The facility did not provide the resolution for the 2019 Mechanical Integrity (MI) Audit findings for the Controlled Pressure Receiver (CPR), Suction Accumulator, and evaluation of the Safety Relief Valves (SRV) corrections. [68.73(e)].
7. The facility's MI Policy does not have a date or revision date.
8. The facility did not periodically evaluate the performance of CWR, Specpoint Systems, and Kapco, LLC, contractors in fulfilling their obligations. [68.87(b)(5)].
9. The facility has not performed the annual emergency response coordination activities or performed the annual notification exercises. [68.90(b)(4), (5)].
10. The facility has not coordinated response needs with local emergency planning and response organizations to determine how the stationary source is addressed in the community emergency response plan and ensured that local response organizations are aware of the regulated substances at the stationary source nor documented coordination with local authorities. [68.93(a), (c)].

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 CAA.

1. 2019 Mechanical Integrity Audit findings based on evaluation of SRI/system corrections.
2. Hazard Assessment items 25-32 of RMP Inspection Checklist
3. 2019 Mechanical Integrity Audit resolution or findings of CPR and Suction Accumulator.

INSPECTION REPORT CERTIFICATION:

This is to certify that I, Edward Johannes, was the lead inspector at this facility and that I have verified the accuracy of the observations in this inspection report:

EDWARD JOHANNES (Affiliate)

Digitally signed by EDWARD JOHANNES (Affiliate)
Date: 2023.11.08 12:23:02 -08'00'

Inspector Signature

JAVIER MORALES

Digitally signed by JAVIER MORALES
Date: 2023.11.08 13:27:07 -08'00'

RMP Coordinator/Approval

ERIN WILLIAMS

Digitally signed by ERIN WILLIAMS
Date: 2023.11.13 14:39:10 -08'00'

EPCRA Coordinator/Approval

MATTHEW QUARTERMAN

Digitally signed by MATTHEW QUARTERMAN
Date: 2023.11.15 16:06:22 -08'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: Roche Fruit Warehouse
City, State: Yakima, WA
Photographer: Morgan Larimer

File	Photo Layout ID	Date	Time	Description
Photo1.jpg	1	8/16/2023	09:30 AM - 10:00 AM	Engine Room 9 (ER-9) exterior with South entrance, louvered air intake, and four condensers on top; High-Pressure Receiver (HPR) with thermosyphon in the background.
Photo2.jpg	2	8/16/2023	09:30 AM - 10:00 AM	Emergency shower/eyewash station located inside entry to ER-9.
Photo3.jpg	3	8/16/2023	09:30 AM - 10:00 AM	East exit door and ammonia detector to the right.
Photo4.jpg	4	8/16/2023	09:30 AM - 10:00 AM	Ammonia detector daily inspection log binder.
Photo5.jpg	5	8/16/2023	09:30 AM - 10:00 AM	Room overview starting with Compressor 6 (right) to Compressor 1 (left).
Photo6.jpg	6	8/16/2023	09:30 AM - 10:00 AM	Overview of compressors 1 (left) through 5 (right).
Photo7.jpg	7	8/16/2023	09:30 AM - 10:00 AM	Safety Relief Valve installation tags on Compressor 6.
Photo8.jpg	8	8/16/2023	09:30 AM - 10:00 AM	Defrost tank exhaust and ventilation in northwest corner across from Compressor 3.
Photo9.jpg	9	8/16/2023	09:30 AM - 10:00 AM	Louvered wall penetration for air intake on southern wall above door.
Photo10.jpg	10	8/16/2023	09:30 AM - 10:00 AM	Thermosyphon outside of ER-9.
Photo11.jpg	11	8/16/2023	09:30 AM - 10:00 AM	Condensers 3 (front) through 1 (back) atop ER-9.
Photo12.jpg	12	8/16/2023	09:30 AM - 10:00 AM	Ammonia piping and pipe rack over North First Avenue and windsock.
Photo13.jpg	13	8/16/2023	09:30 AM - 10:00 AM	Evaporator banks in Cold Storage 1 within Building 83.