



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 – Tier III
Facility Inspection Report

FACILITY INFORMATION:

Name: Safeway Spokane Distribution Center
Physical Address: 5707 N. Freya St., Spokane, WA 99217
Phone Number: (509) 482-3131
Latitude/Longitude: 47.709945/-177.35834
RMP Facility ID#: 100000246441
FRS ID#: 110002151206
EJ Concerns: Yes (Above 80%)

CONTACT INFORMATION (RMP Implementation):

Name: Tom Rowland
Phone Number: (509) 482-3131
E-mail: tom.rowland@safeway.com

EMERGENCY CONTACT INFORMATION:

Name: Tom Rowland
Phone (24-hr): (509) 435-8676
E-mail: tom.rowland@safeway.com
Website: www.safeway.com

TRIP DETAILS:

Inspection Date: July 11, 2023
Inspection Time: 0830 through 1400 hours
EPA Inspection Team:
Mhara Coffman, US EPA Region 10, Lead RMP Inspector
Peter Phillips, US EPA Region 10 SEE Grantee, RMP Inspector
Terry Garcia, 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: March 13, 2021

Date of Latest Update: March 13, 2021

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)
1000115241	Anhydrous Ammonia – North Engine Room	1000144093	49312	3	Ammonia, Anhydrous (7664-41-7)	7,616
1000115241	Anhydrous Ammonia - South Engine Room	1000144093	49312	3	Ammonia, Anhydrous (7664-41-7)	4,434

PURPOSE:

The purpose of this inspection was to determine if 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: First time submission: March 12, 2021
- 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 2023 Tier II report to the SERC?

No ☐ Yes ☒*If Yes, Date the Tier II was submitted:* 02/20/2023*If No, calendar year of the most recent Tier II:*

Did the facility submit a Tier II to the LEPC and local fire department?

No ☐ Yes ☒*If Yes, Date the Tier II was submitted:* 02/20/2023

INSPECTION ENTRY:

Mhara Coffman led the inspection entry. The EPA Inspection Team (EPA) met with facility representatives at the Safeway Spokane Distribution Center facility in Spokane, Washington. EPA arrived at the facility at 0830 hours and was joined by the following facility personnel:

Name	Title, Organization
John Ryser	Foreman/Albertsons
Randall Brennan	Senior PSM/RMP Project Manager/Albertsons
Jerry Mills	Maintenance/Albertsons
Chris Barthell	Director of Distribution/Albertsons
Andrew Fiala	Project Manager/Albertsons
Jeremy Kunstman	Maintenance Manager/Albertsons

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

If Yes, Name and Title of Representative:

The facility is a first responder: No ☒ Yes ☐

If No, Responding Agency: Spokane Fire Department

Facility representatives escorted EPA to a conference room located in the facility's main building. Lead Inspector Mhara Coffman 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. The facility representatives listed on the above table, led by John Ryser 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 ☒

If Yes, Name of Union: Teamsters local 690 and AeroSpace Machinists 86

An employee representative present during the facility visit: No ☐ Yes ☒

If Yes, Name/Title: John Ryser/Forman

GENERAL INFORMATION:

The facility is managed under RMP rule a Program Level 3 facility and is owned and operated by Albertsons. The facility provides large scale storage for food distribution to 53 stores in eastern Washington and northern Idaho. The facility uses two anhydrous ammonia refrigeration systems to cool areas for receiving, storing, and shipping produce, meats, and liquids for distribution. The two refrigeration systems provide cooling at the facility, each supported by separate dedicated engine rooms. The North Engine Room system utilizes 7,616 pounds of anhydrous ammonia, and the South Engine Room system utilizes 4,434 pounds of anhydrous ammonia. The separate refrigeration systems cool two large cooler spaces at the facility.

The North Engine Room system cools a large refrigeration space identified as the Main Cooler, which is comprised of multiple smaller areas described as the Egg Room, Perishables, Cheese Room, General Produce, Wet Goods, and Dry Goods. Twenty-two evaporators support the Main Cooler. The South Engine Room cools an area described as the Meat Cooler, which is cooled by six evaporators. There are 104 full-time employees on site, three of whom serve as Refrigeration Operators. Contractors are used for maintenance: Power City does electrical work, and Kemper Northwest performs refrigeration maintenance. The facility operates 24 hours a day, 362 days a year.

The North Engine Room was built in 1963 and the South Engine Room in 1972. In 2017, the South Engine Room upgraded the refrigeration system, including compressors, evaporator and the condenser. The roof top condenser for the North Engine Room is scheduled to be replaced in 2023.

ON-SITE OBSERVATIONS:

EPA toured the facility from approximately 0950 hours to 1030 hours, escorted by facility representatives Randall Brennan, John Ryser, Jerry Mills, Chris Barthell, Jeremy Kunstman, and Andrew Fiala. EPA observed the North Engine Room, Main Cooler, Meat Cooler, and roof-mounted condensers on top of the facility exterior.

EPA observed schematics depicting system operations of the North and South Engine Rooms, as well as the Main Cooler and Meat Cooler areas (photos 1-4).

North Engine Room

EPA observed refrigeration system components housed in the North Engine Room. The facility has posted hazard communication (hazcom) signage on the interior access door to the engine room (photo 5), and posters showing ammonia chemical data and response information near the access door (photo 6). Refrigeration system process equipment includes an ammonia auto-purge (photo 8) four ammonia pumps, three low pressure receivers (LPRs) (photos 10-11), a receiver and associated king valve (photos 12-14), four compressors (photos 15-17), and a thermosyphon receiver (photo 18). Pressure relief valves (PRV's) are within current certified service dates and are due to be replaced by November 2026 (photo 19). EPA observed the system air intake and exhaust vents with fans, and controls for the fans (photos 20-24). A roof-mounted evaporator supports the system from the building exterior roof (photo 23). Safety features in the North Engine Room include one emergency eyewash station (photo 7), two ammonia detectors (photo 9), hazcom signage at access doors (photos 6 and 24) and emergency stops supporting the refrigeration system (photos 24-25).

South Engine Room

EPA observed refrigeration system components housed in the South Engine Room. Safety features at the exterior access door to the South Engine Room include an emergency eyewash station, refrigeration system emergency stops, and posted hazcom signage (photo 26). A windsock is mounted on the building

roof adjacent to the roof-mounted evaporator above the South Engine Room (photos 27-28). EPA observed additional safety features inside the South Engine Room including an emergency eye wash station (photo 29) and two ammonia detectors (photos 30 and 39). EPA observed refrigeration system components including air intake (not pictured) and exhaust vents (photo 31) with fans, a high-pressure receiver (HPR) and associated king valve located on a mezzanine, with ladder access (photo 32), two compressors (photo 33), PRVs certified until November 2026 (photo 34), and two LPRs (photos 35-36). EPA observed additional safety features at an interior access door which include an additional emergency eyewash station near the ammonia auto-purge (photo 37), and hazcom signage posted at the access door entry to the South Engine Room (photo 38).

Cool Rooms

EPA observed 22 evaporators in the Main Cooler area (photo 40) and four evaporators in the Meat Cooler area. The facility has two additional evaporators in a cooled dock area. Ammonia detectors are located throughout the cool room areas (photo 41).

Ammonia detectors are located throughout the facility. The following table shows the number of ammonia detectors, their respective locations, and action levels :

Sensor Location	Number of Sensors	Action Level	Action
North Engine Room	2	25 ppm	Audible and visual alarm, and alarm sent to alarm monitoring company
		150 ppm	Emergency ventilation system activated
		10,000 ppm	Complete shutdown of engine room equipment, main liquid control valve closed
South Engine Room	2	25 ppm	Audible and visual alarm, and alarm sent to alarm monitoring company
		150 ppm	Emergency ventilation system activated
		10,000 ppm	Complete shutdown of engine room equipment, main liquid control valve closed
Refrigeration Rooms	18	25 ppm	Low level alarm, audible and visual alarm activated and alarm sent to alarm monitoring company
		100 ppm	Fans are shut down, liquid feed for affected areas is closed
Outside Machine Room Door	1	150 ppm	Emergency ventilation activated

EPCRA Regulated Charging Areas

EPA observed an EPRCA-regulated dedicated battery charging area where the facility stages battery powered equipment during charging (Photo 41).

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

After touring the RMP-covered process areas at the facility, EPA returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to Randall Brennan, John Ryser, Jerry Mills, Chris Barthell, Jeremy Kunstman, and Andrew Fiala.

INFORMATION COLLECTED FROM FACILITY:

1. Compliance Audit – Certification Page
2. SOP training log
3. Tier II to Fire Department Documentation Email – 8 pages

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

1. General: Albertsons was unable to provide documentation on the emergency coordination activities in accordance with 68.95 (See items 2 through 5 of Subpart E). [68.10-15]
2. General: Albertsons has not developed plans for conducting emergency exercises in accordance with 68.96 by December 19, 2023 (See items 1.b.(8) – 1.b.(17), 6, and 7 of Subpart E). (68.10-15)
3. Compliance Audits: Albertsons has not certified their 2020 compliance audit [68.79(a)].
4. Risk Management Plan: Albertsons did not provide date of the most recent coordination with the local emergency planning and response efforts. [68.180(a)]

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. Emergency Response – any documentation from contacting the fire department to coordinate/exercises (email, receipts, etc..).
2. Contractor information for Power City Electricians, plus safety performance and current insurance.

INSPECTION REPORT CERTIFICATION:

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

MAIGHDEAN-MHARA
COFFMAN

Digitally signed by MAIGHDEAN-MHARA
COFFMAN
Date: 2023.10.30 15:23:28 -07'00'

Inspector Signature

JAVIER MORALES

Digitally signed by JAVIER
MORALES
Date: 2023.10.31 10:21:14 -07'00'

RMP Coordinator/Approval

ERIN WILLIAMS

Digitally signed by ERIN WILLIAMS
Date: 2023.11.06 15:10:08 -08'00'

EPCRA Coordinator/Approval

MATTHEW
QUARTERMAN

Digitally signed by MATTHEW
QUARTERMAN
Date: 2023.11.07 06:15:32 -08'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: Safeway Distribution Center

City, State: Spokane, WA

Photographer: Mike Wolski

File	Photo Layout ID	Date	Time	Description
Photo1.jpg	1	7/11/2023	9:50 AM	North Engine Room Schematic
Photo2.jpg	2	7/11/2023	9:50 AM	South Engine Room Schematic
Photo3.jpg	3	7/11/2023	9:50 AM	Main Cooler Schematic
Photo4.jpg	4	7/11/2023	9:50 AM	Meat Cooler Schematic
Photo5.jpg	5	7/11/2023	10:00 AM	North Engine Room; Access door with hazardous communication signage and a lock out tag out station
Photo6.jpg	6	7/11/2023	10:00 AM	North Engine Room; Hazcom signage including ammonia chemical data and response information
Photo7.jpg	7	7/11/2023	10:00 AM	North Engine Room; Emergency shower and eye wash station
Photo8.jpg	8	7/11/2023	10:00 AM	North Engine Room; Ammonia auto-purge device
Photo9.jpg	9	7/11/2023	10:00 AM	North Engine Room; Ammonia detectors
Photo10.jpg	10	7/11/2023	10:05 AM	North Engine Room; Low Pressure Receiver 1(LPR 1) 1PR 1 and Ammonia Pumps 1 and 2
Photo11.jpg	11	7/11/2023	10:05 AM	North Engine Room; LPR 2, LPR 3, and Ammonia Pumps 3 and 4
Photo12.jpg	12	7/11/2023	10:05 AM	North Engine Room; Receiver tank and king valve
Photo13.jpg	13	7/11/2023	10:05 AM	North Engine Room; King valve
Photo14.jpg	14	7/11/2023	10:05 AM	North Engine Room; Additional safety valves supporting refrigeration system
Photo15.jpg	15	7/11/2023	10:05 AM	North Engine Room; Refrigeration system compressor and ammonia transfer lines
Photo16.jpg	16	7/11/2023	10:10 AM	North Engine Room; Refrigeration system Compressors 1 and 2
Photo17.jpg	17	7/11/2023	10:10 AM	North Engine Room; Refrigeration system Compressors 3 and 4
Photo18.jpg	18	7/11/2023	10:10 AM	North Engine Room; Thermosyphon receiver
Photo19.jpg	19	7/11/2023	10:10 AM	North Engine Room; PRV valve, due for replacement in November 2026
Photo20.jpg	20	7/11/2023	10:10 AM	North Engine Room; Engine Room system air intake
Photo21.jpg	21	7/11/2023	10:10 AM	North Engine Room; Engine Room system exhaust vent
Photo22.jpg	22	7/11/2023	10:10 AM	North Engine Room; Controls for air intake, discharge exhaust fan, and supply fan
Photo23.jpg	23	7/11/2023	10:15 AM	Facility Exterior, North Engine Room; Roof-mounted evaporator
Photo24.jpg	24	7/11/2023	10:15 AM	Facility Exterior, North Engine Room; Exterior access door with refrigeration system emergency stops, hazcom signage, and emergency eyewash station
Photo25.jpg	25	7/11/2023	10:15 AM	Facility Exterior, North Engine Room; Emergency stops at facility access door
Photo26.jpg	26	7/11/2023	10:15 AM	Facility Exterior, South Engine Room; Exterior access door with refrigeration emergency stops, hazcom signage, and emergency eyewash station
Photo27.jpg	27	7/11/2023	10:15 AM	Facility Exterior, South Engine Room; Windsock above South Engine Room
Photo28.jpg	28	7/11/2023	10:15 AM	Facility Exterior, South Engine Room; Roof-mounted evaporator
Photo29.jpg	29	7/11/2023	10:20 AM	South Engine Room; Emergency eye wash station
Photo30.jpg	30	7/11/2023	10:20 AM	South Engine Room; Ammonia detector
Photo31.jpg	31	7/11/2023	10:20 AM	South Engine Room; Exhaust vent and fan
Photo32.jpg	32	7/11/2023	10:20 AM	South Engine Room; High pressure receiver (HPR) and ladder-accessible kind valve

File	Photo Layout ID	Date	Time	Description
Photo33.jpg	33	7/11/2023	10:20 AM	South Engine Room; Refrigeration system compressor
Photo34.jpg	34	7/11/2023	10:20 AM	South Engine Room; PRV valve, to be replaced by November 2026
Photo35.jpg	35	7/11/2023	10:20 AM	South Engine Room; LRPs 1 and 2
Photo36.jpg	36	7/11/2023	10:20 AM	South Engine Room; Refrigeration system ammonia transfer lines
Photo37.jpg	37	7/11/2023	10:20 AM	South Engine Room; Emergency eye wash station adjacent to ammonia auto-purge
Photo38.jpg	38	7/11/2023	10:20 AM	South Engine Room; Interior access door with hazcom signage
Photo39.jpg	39	7/11/2023	10:20 AM	South Engine Room; Ammonia detector
Photo40.jpg	40	7/11/2023	10:25 AM	Main Cooler; Refrigeration system evaporators
Photo41.jpg	41	7/11/2023	10:25 AM	Main Cooler; Ammonia detector
Photo42.jpg	42	7/11/2023	10:30 AM	Battery Charging Station; Equipment battery charging station regulated under EPCRA