United States Environmental Protection Agency

**Region 6 - Enforcement & Compliance Assurance Division**

# INSPECTION REPORT

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| Inspection Date(s): | August 6-8, 2024 | |
| Media Program: | Air | |
| Regulatory Program(s) | Clean Air Act (CAA) § 112(r) and 40 Code of Federal Regulations (C.F.R.) Part 68 Chemical Accident Risk Management Plan (RMP) | |
| | | |
| Company Name: | **Cargill Inc.** | |
| Facility Name: | **Cargill Meat Solutions Corporation** | |
| Facility Physical Location: | 1530 West Highway 60 | |
| (city, state, zip code) | Friona, Texas 79035 | |
| Mailing address: | P.O. Box 579 | |
| (city, state, zip code) | Friona, Texas 79035 | |
| County/Parish: | Parmer | |
| Facility Phone Number | 806-295-3201 | |
| Facility Contact: | Casey Conrad | General Manager |
| | Casey_conrad@cargill.com | |
| | | |
| FRS Number: | 110070864494 | |
| Identification/Permit Number: | 1000 0011 0417 | |
| Media Identifier Number: | RMP 1000113738 | |
| NAICS: | 311611 Animal Slaughtering | |
| SIC: | | |

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| Personnel participating in inspection: | | |
| Kristen Latiolais | EPA Region 6 ECDAC | RMP Inspector |
| Aimee Boss | EPA Region 6 ECDAC | RMP Inspector |
| Alexandra Castilleja | Cargill Inc. | EHS Manager |
| Paige La Due | Cargill Inc. | Sr. Process Safety Engineer |
| Michael Lacher | Cargill Inc. | Process Safety Engineer |
| Ronaldo Garcia | Cargill Inc. | Tech Safety Supervisor |
| Casey Conrad | Cargill Inc. | Plant Manager |
| Kevin Hughes | Cargill Inc. | Tech Safety Superintendent |
| Ruben Ramos | Cargill Inc. | Utilities Supervisor |
| Lionel Martinez | Cargill Inc. | Union Representative |
| Cody Snyder | Cargill Inc. | PSM Coordinator |
| Ricky Morris | Cargill Inc. | Environmental Superintendent |
| Danny Duran | Cargill Inc. | Plant Engineer |

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| EPA Lead Inspector Signature/Date | KRISTEN LATIOLAIS Digitally signed by KRISTEN LATIOLAIS Date: 2024.10.21 09:14:16 -05'00' | |
| | Kristen Latiolais | Date |
| Supervisor Signature/Date | SAMUEL TATES Digitally signed by SAMUEL TATES Date: 2024.10.22 08:19:03 -05'00' | |
| | Samuel Tates | Date |

## Section I – INTRODUCTION

### PURPOSE OF THE INSPECTION

United States Environmental Protection Agency (EPA) Region 6 Inspectors Kristen Latiolais and Aimee Boss ("we"), arrived at the Cargill Meat Solutions Corporation (the "Facility"), operated by Cargill Inc., in Friona, Texas at 9:00 AM on August 6, 2024, for an announced inspection. We met with Casey Conrad (Plant Manager) and Alexandra Castilleja (EHS Manager) at the Opening Conference. I, Kristen Latiolais, presented my credentials to Casey Conrad and Alexandra Castilleja and informed them that this was an EPA inspection to evaluate compliance with the requirements of the Chemical Accident Prevention Provisions of Title 40 of the Code of Federal Regulations (C.F.R.) Part 68 under Clean Air Act (CAA) § 112(r). Employee representatives were invited to participate in the inspection. The Facility had Lionel Martinez as union representation.

### FACILITY DESCRIPTION

Cargill Meat Solutions Corporation is located at 1530 West Highway 60, Friona, Texas 79035. The Facility is in operation 24 hours a day, seven days a week, and has approximately 2,300 employees. The facility utilizes an anhydrous ammonia refrigeration system to keep cold storage for meat processing and for food storage and distribution. The facility stores more than the 10,000 lbs. threshold quantity for Risk Management Plan (RMP) regulated substance of anhydrous ammonia. The anhydrous ammonia is the only regulated substance present at Cargill Meat Solutions Corporation. An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 C.F.R. § 68.115, shall comply with the requirements of the Part 68 – Chemical Accident Prevention Provision.

## Section II - OBSERVATIONS

The documentation review began onsite with Cargill Inc. personnel as listed on the sign in sheets, see **Appendix 2**.

### 40 C.F.R. Part 68 – CHEMICAL ACCIDENT PREVENTION PROVISION

### Subpart A – General

**40 C.F.R. § 68.10 Applicability –** Cargill Meat Solutions Corporation is a stationary source that has more than a threshold quantity of regulated substances in their process. Cargill Meat

Solutions is a RMP Program 3 facility. The Facility is subject to the Occupational Safety and Health Administration's (OSHA) Process Safety Management (PSM) Standard (29 C.F.R. § 1910.119).

**40 C.F.R. § 68.12 General requirements –** Cargill Meat Solutions submitted their most recent RMP submission on May 18, 2024, for the 5-year update. The regulated substance (anhydrous ammonia) is a listed toxic substance over the threshold quantity for the RMP Program Level 3 process.

**40 C.F.R. § 68.15 Management –** Cargill Meat Solutions Corporation has developed a management system to oversee the implementation of the RMP Program elements. Cargill Meat Solutions Corporation provided an organizational chart that outlined the positions for implementation of the individual elements of the RMP, as required by this subpart, at the time of this inspection.

**Subpart B – Hazard Assessment**

**40 C.F.R. § 68.20 Applicability –** Cargill Meat Solutions Corporation operates an RMP Program Level 3 process, which is subject to this subpart and is required to prepare a worst-case release scenario analysis. Cargill Meat Solutions Corporation provided the worst-case release scenario analysis and a five-year accident history in the RMP. We identified no areas of concern with this subpart.

**40 C.F.R. § 68.22 Offsite consequence analysis parameters** – Cargill Meat Solutions Corporation provided the parameters in the RMP as required by this subpart. We identified no areas of concern with this subpart.

**40 C.F.R. § 68.25 Worse-case release scenario analysis** – Cargill Meat Solutions Corporation analyzed and reported a worst-case release scenario in the RMP as required by this subpart. We identified no areas of concern with this subpart.

**40 C.F.R. § 68.28 Alternative release scenario analysis** – Cargill Meat Solutions Corporation identified an alternative release scenario in its Program 3 process as required by this subpart. We identified no areas of concern with this subpart.

**40 C.F.R. § 68.30 Defining offsite impacts-population** – Cargill Meat Solutions Corporation did not use the most current Census Bureau population data. The facility RMP update on May 18, 2024, Page 9 states the facility used Marplot 5.1.1 with 2010 census data **[AOC 1: 68.30(c)].**

**40 C.F.R. § 68.33 Defining offsite impacts-environment** – Cargill Meat Solutions Corporation used United States Geological Survey maps data on the MARPLOT database, version 5.1.1, to determine the environmental receptors or how information for the greatest distance in any direction to an endpoint was gathered as required by § 68.22. We identified no areas of concern with this subpart.

**40 C.F.R. § 68.36 Review and update –** Cargill Meat Solutions submitted their most recent RMP submission on May 18, 2024, for the 5-year update. We identified no areas of concern with this subpart.

**40 C.F.R. § 68.39 Documentation –** Cargill Meat Solutions Corporation operates a RMP Program Level 3 process, which is subject to this subpart and is required to prepare a worst-case release scenario analysis and complete the five-year accident history. We reviewed the worst-case and alternative-case scenarios provided; Methodology and explanation of the parameters for the Offsite Consequence Analysis (OCA) was documented as required by this subpart.

**40 C.F.R. § 68.42 Five-year accident history –** Cargill Meat Solutions Corporation did not report any accidental release(s) in their RMP that resulted in deaths, injuries, or property damage. We reviewed the documentation provided to make this analysis and identified no areas of concern with this subpart.

**Subpart D – Program 3 Prevention Program**

**40 C.F.R. § 68.65 Process safety information (PSI) -** We reviewed various sections of the PSI for the RMP covered process at Cargill Meat Solutions. We were not provided the original process and instrumentation diagram (P&ID) associated with the process, due to the P&ID's currently being updated by a Provenance Consulting. We reviewed the block flow diagram and a compilation of written process safety information (PSI) before conducting any process hazard analysis required by this subpart.

As noted in the 2020 and 2023 compliance audits as well as the facility tour, multiple pieces of process equipment were missing equipment placards and labeling according to IIAR 2- Safe Design of Ammonia refrigeration systems **[AOC 2: 68.65(d)(2)]**

It was noted in the Mechanical Integrity Audit performed in 2018 and 2023 that the wooden supports for the piping on the roof had failed or were unsecure. We observed this finding on the facility tour. According to IIAR 9- Chapter 7, Minimum System Safety Requirements: piping, tubing and equipment shall be supported to prevent excessive vibration and movement. This standard is considered a recognized and generally accepted good engineering practice (RAGAGEP) for above ground piping systems. **[AOC 3: 68.65 (d)(2)]**

During the facility walk through, we observed that the facility was missing markings on ammonia piping mains, headers, and branches (Photo #s 1, 3, 4, 5, 7 & 10 located in Appendix 1) – e.g., direction of flow, physical state of the ammonia, relative pressure and pipe service as required by the IIAR 9- Chapter 7, *Minimum System Safety Requirements.* This standard is considered a RAGAGEP for above ground piping systems. This observation was also noted in both 2018 & 2023 mechanical integrity audits. **[AOC 4: 68.65 (d)(2)]**

During the facility walk through, we observed the door to the engine room #2 was left open and would not lock or close properly, as required by IIAR 9, Chapter 7 Minimum System Safety Requirements, Section 7.3.9.2 – e.g., machinery room doors shall be self-closing and tight fitting. This standard is considered a RAGAGEP for above ground piping systems. **[AOC 5: 68.65(d)(2)]**

During the facility walk through, we also observed a leaking water line from the water pumps inside the engine room #2, the sulfuric acid containment valve left in the "open" position, oil pots with used oil near the High Side Accumulator Pressure Vessel and a few compressors showing a "warning" on the operating screen. The facility was able to fix these findings promptly while we were on site.

**40 C.F.R. § 68.67 Process hazard analysis (PHA) –** Cargill Meat Solutions was able to provide us with their 2022 & 2017 PHA's, tracking of recommendations and PHA Policy for the regulated process at the time of this inspection. The facility utilizes HAZOP and LOPA as their PHA methodologies. The 2017 PHA was conducted on November 6-8, 2017 and the 2022 PHA was conducted on October 3-12, 2022.

The policy labeled "A16_A20_PRA Job Aid Appendix A CPNA Business Specific Job Aid" Page 18 includes a guidance for recommendations in Table 1. Table 1 specifies an urgency time period depending on the priority ranking, from highest to lowest. The policy also includes a risk matrix that is used to determine the independent safety layers (ISL) used to develop the priority ranking. When reviewing the 2022 PHA recommendations and tracking, I noted that the term "No Ranked Priority" is used for 9 of the 23 recommendations as the priority description. However, the policy does not specify the definition of "No Ranked Priority" nor an urgency timeline to correct the recommendations with a priority description of "No Ranked Priority". I also noted during this review that items listed as "completed" often have a blank column for actions taken and no completion date available.

According to the facility's policy for Urgency time period, priority ranking from highest to lowest is used as a guideline to address PHA recommendations and tracking. When reviewing the 2022 PHA recommendations and tracking at the time of the inspection, I noted the completion status of recommendation 2, 3, 6, 10 & 12 were past the urgency time period specified in the facility's policy. **[AOC 6: 68.67 (e)]**

On the 2022 PHA recommendations, it is stated that the facility needs to "upgrade the security" in certain areas of the facility to ensure all doors and gates are self-closing and locking". During the facility tour, I observed the gate to a restricted area that remained open during the facility tour. **[AOC 7: 68.67(e)]**

**40 C.F.R. § 68.69 Operating procedures –** We reviewed several operating procedures such as: lock out/tag out, hot work program, initial startup, normal operations, temporary operations, emergency shutdown, emergency operations, normal shutdown, and startup following a turnaround, or after an emergency shutdown for Cargill Meat Solutions as required by this subpart. The last two annual certifications of all operating procedures in the RMP units were requested. Cargill provided the requested documentation; however, dates were not present indicating when the annual certifications were performed. **[AOC 8: 68.69(c)]**

Cargill Meat Solutions lockout/tagout policy (labeled "C2_LOTO Policy.pdf" Page 1) states, "Tagout only policy for valves on refrigeration systems will be addressed as a separate policy." However, it was verbally stated that there is no policy available for lockout/tagout for valves on refrigeration systems. The lockout/tagout policy also mentions (in section 3.9.2., Page 6), "Periodic inspections shall be performed on each authorized employee at least annually and shall be documented using the Periodic Inspection form found in Appendix B." However, the form provided during the inspection that the facility utilizes for the inspection process on employees for lockout/tagout annual inspections was not the form found in Appendix B. **[AOC 9: 68.69(a)]**

Cargill Meat Solutions Lockout/tagout policy labeled "C2_LOTO Policy.pdf" Page 10 provides lockout procedures for electrical equipment. Step 9 states to "take a deep breath and hold it." Page 11 provides lockout procedures for restoring machinery/equipment to operation. Step 12 also states to "Take a deep breath and hold it." There are no instructions regarding how long breath should be held. **[AOC 10: 68.69(d)]**

We reviewed the line break policy and line break permit. The line break permit utilized by Cargill Meat Solutions does not state who safety watch is. The facility stated verbally that the authorizer of the permit could be safety watch. However, this is not reflected in the facility's Line Break Policy **[AOC 11: 68.69(d)].**

**40 C.F.R. § 68.71 Training –** Cargill Meat Solutions was able to provide us with their training documentation and corresponding policy for the regulated process at the time of this inspection. This subpart requires each employee to be trained in an overview of the process and in the operating procedures before being involved in operating a newly assigned process and that refresher training shall be provided at least every three years. We randomly selected employees from Maintenance and Process Operators to review their training required by the facility's policy.

The facility provided us with a chart that showed training dates for each employee. The chart was color coded. If the space was red, the employee's training was out of date. If the space was green, the employee's training was up to date. We observed three maintenance employees with green cells that should have been red due to out-of-date training certificates or no training at all. We also observed three process operators' training with inconsistencies such as dates appeared to be written over, original dates appeared to be from the previous year, print dates were later than the completion date, signatures and information missing on training certificates and missing refreshers. **[AOC 12: 68.71(c)]**

**40 C.F.R. § 68.73 Mechanical integrity (MI) –** EPA reviewed records for the RMP covered process equipment. Cargill Meat Solutions provided us with written procedures for inspection and testing of equipment, MI Inspections from 2018 and 2023, and UT testing for pressure vessels for the last 10 years.

The preventative maintenance program is conducted by Cargill Protein Group Corporate Utilities team and includes weekly, monthly, quarterly, semi-annual, and annual inspections. Weekly inspections include observations for evaporators, heat exchangers, safety showers, compressors, and condensers. Monthly inspections involve compressors, condensers, oil pots, coolant, ventilation system, ammonia detectors, a general monthly walk through, evaporators, and heat exchangers. The checklist used for weekly, monthly, quarterly, semi-annual, and annual inspections are documented as part of the PM rounds and tracked in Enablon. Audit findings are inserted as part of this process and addressed individually as the facility assigns due dates according to urgency.

We reviewed the 2023 & 2018 Mechanical Integrity Visual Inspection/Audits of the compressors, pumps, condensers, evaporators, pressure vessels, heat exchangers and piping. Both Inspections/Audits noted multiple units and piping missing proper labeling according to ANSI/ASME Standard A13.1, Scheme for the Identification of Piping Systems and IIAR 2- Safe Design of Ammonia Refrigeration Systems. We also noted this finding on the facility tour. The evaporator fan guards were also noted in the 2023 audit to be unsecured and using plastic zip ties in place of proper mechanical fasteners, which does not follow manufacturers' recommendations (See document B9_MI Audit Finding No 62) **[AOC 13: 68.73(f)(2)]**

**40 C.F.R. § 68.75 Management of change (MOC) –** Cargill Meat Solutions was able to provide the MOC procedure at the time of this inspection. We were provided with and reviewed an MOC for the penthouse air unit replacement as a result of the April 11, 2022 incident investigation (MOC 13725.PA.478163), as well as the "originator checklist", which is performed to determine action plans needed within the MOC. This MOC Originator Checklist has options to select if updates for the P&IDs are completed and if equipment is being modified/added or deleted for the change being made. When reviewing this selected MOC originator checklist for complete replacement of the penthouse air units, it was marked "no" for "Does this change result in adding, deleting or modifying tanks, equipment, piping or machinery?". It was also marked "no" for "Does the change require process documentation to be updated." At the time of the inspection, the facility verbally stated the replacement was not a replacement in kind. **[AOC 14: 68.75(d)]**

**40 C.F.R. § 68.77 Pre-startup safety review (PSSR) –** Cargill Meat Solutions provided the PSSR Readiness Checklist form for the replacement of the penthouse air units per ASME/ANSI B31.5 and IIAR-5 2019 Ch. 7 Startup Process. We were also provided additional startup documentation such as startup checklists, the Process Safety and Risk Management standard and standard operating procedures, as required by the IIAR and this subpart.

**40 C.F.R. § 68.79 Compliance audits –** Cargill Meat Solutions was able to provide us with the 2020 and 2023 compliance audits for the regulated process at the time of this inspection. The facility utilizes Provenance Consulting for the compliance audit process. We reviewed the findings and tracking of both 2020 and 2023 compliance audits. It was noted in the 2023 compliance audit that the facility has no site-specific electrical classification available for the covered process (P&ID). The facility is currently waiting on the arrival of the P&IDs from the contractor. The 2023 compliance audit identified 14 findings and according to the facility, all action items are still open. The 2020 compliance audit identified 16 findings and according to the facility tracking, all items have been resolved. However, there is only a "due date" and not a "resolution date" or a response to each of the findings to document how the deficiencies have been corrected **[AOC 15: 68.79(d)].**

**40 C.F.R. § 68.81 Incident investigation -** We reviewed a Summary of Incident Investigation Reports for several releases, including one for a release on April 11, 2022 (Report 08092024Scan085301). The incident was cause by corrosion on the Air Unit 100 coil that resulted in a release of ammonia to the inside of the facility. It is estimated that 6 lbs of anhydrous ammonia was released during the approximate 0.5-hour duration. The contributing causes from the incident were natural wear and tear on the air unit coil, age of the unit past its lifespan and weather. The recommendations from the investigation were to do a replacement of the air unit to be completed by 1/30/2024. The incident investigation occurred within 48 hours of the incident, as required by this subpart. Additionally, we reviewed the MOC for the pressure air unit replacement to ensure the status. The MOC shows the repair being completed earlier than the projected date.

While reviewing incident reports, it was often observed that the facility would write "N/A" for corrective actions and some corrective action descriptions were not expanding on what action was completed.  Although the facility's incident investigation policy, specifies not to leave anything blank, it does mention to write "pending" or "N/A" in the corrective actions tab to let the reviewer know that you are not ignoring the request. We also observed several incident reports either not being specific enough in the closeout description, not signed by the Tech Safety Superintendent and Tech Safety Supervisor or no date of the signature on the closeout **[AOC 16: 68.81(f)].**

We reviewed incident report for an incident that occurred on July 27, 2021. The release was caused by a worn-out gasket on the actuating valve for the HTRS line. On the recommended changes section, it was stated that an "improved gasket material will be used going forward". However, when we asked the facility of proof that they were using an improved gasket material at the time of inspection, the facility could not provide documentation to show this change **[AOC 17: 68.81(e)]**

After a review of the incident reports, the facility has reported 18 incidents since 2020, not including drills, resulting in a total amount of 334 lbs. of ammonia released.

**40 C.F.R. § 68.83 Employee participation –** Cargill Meat Solutions provided us with their written plan of action regarding the implementation of the employee participation at the time of this inspection. We identified no areas of concern with this subpart.

**40 C.F.R. § 68.85 Hot work permit –** We reviewed the hot work procedure and hot work permits provided for the last 3 years. The Hot Work procedure specifies that only trained individuals on salary are authorized to issue hot work permits. The facility utilizes a Pre Job Hazard-Analysis form to determine if hot work is needed, prior to the issuance of a hot work permit. While reviewing the hot work permits and associated PJHA forms, we observed the description of hot work method, tools and PPE were not being filled out on the hot work permit and PJHA forms with inaccurate information. **[AOC 18: 68.85(b)]**

**40 C.F.R. § 68.87 Contractors –** We reviewed the Contractor Site Expectations and Orientation Policy that explains the expectations of the contract work. We also observed the Pre Job Hazard Assessment and Contractor Safety Orientation Quiz that is required to be reviewed and signed by each onsite visitor and contractor prior to performing work on site. This document includes the contractor potential risks, safety data sheet, hot work program, and lockout/tagout program. The PJHA must include 5 job steps, 5 top hazards and 5 ways to control/eliminate the top 5 hazards associated with the job.

According to the facility Contractor Policy, site specific training is outlined under each job description.

The facility utilizes the Avetta selection system to select qualified contractors as well as perform periodic evaluations of the contractors on site.

We reviewed an incident report and NRC 1279348 for a release that occurred on June 11, 2020. Under the contributing causes on the incident report, it was stated "Contractor not following procedures. Not loosening braces before lifting piping for roof repair". The incident resulted in 6 lbs of Ammonia released to the atmosphere. **[AOC 19: 68.87(b)(4)]**

**Subpart E – Emergency Response**

**40 C.F.R. § 68.90 Applicability** – Cargill Meat Solutions is a responding stationary source in case of an accidental release of a regulated substance and is applicable to this subpart.

**40 C.F.R. § 68.93 Emergency response coordination activities** – Cargill Meat Solutions does not currently coordinate response needs with local emergency planning and response organizations, as required by this subpart. **[AOC 20: 68.93(a)]**

**40 C.F.R. § 68.95 Emergency response program –** We reviewed the Emergency Action Plan (EAP) and Emergency Response Plan (ERP) Cargill Meat Solutions provided. It included procedures and measures for emergency response after an accidental release of a regulated substance, as required by this subpart. The facility has a HAZMAT trailer equipped with response equipment and is also utilized in the annual drills performed by the facility. We reviewed monthly inspections of respirators, yearly testing of Self-Contained Breathing Apparatus' (SCBA), calibration records for handheld detectors and annual certifications of fire extinguishers. The facility utilizes their personal radio system to alert employees of a release who are not maintenance personnel. The facility also has a secondary audible alarm system that is in the process of being updated, projected to be completed by FY 25.

During the review of the ERP, Page 3 of 10 states a "Loss of Containment Tracking Log" is completed after a release is identified. The facility verbally stated a "Loss of Containment Tracking Log" is not utilized in the event of a release. **[AOC 21: 68.95(a)].**

**40 C.F.R § 68.96 Emergency response exercises –** Cargill Meat Solutions provided annual evacuation drills for our review.

**Subpart G – Risk Management Plan**

**40 C.F.R. § 68.190 Updates –** Cargill Meat Solutions RMP submittal was on May 18, 2024, and the previous submittal for this facility was on May 15, 2019. The initial RMP submitted for this facility was on September 13, 2004.

**Facility tour- Observations**
We, Federal inspectors, conducted a walk-through of the facility, accompanied by facility representatives, to observe the facility process equipment, and overall operations.

## Section III – AREAS OF CONCERN (AOC)

1. **40 C.F.R. § 68.30 (c) – Defining Offsite Impacts- Population**
   *(c) Data sources acceptable. The owner or operator may use the most recent Census data, or other updated information, to estimate the population potentially affected.*

   Cargill Meat Solutions Corporation failed to use the most current Census Bureau population data.

2. **40 C.F.R. § 68.65 (d)(2) – Process Safety Information**
   *(d)(2) Information pertaining to the equipment in the process. (2) The owner or operator shall document that equipment complies with recognized and generally accepted good engineering practices.*

   Cargill Meat Solutions failed to properly label equipment with proper placards and labeling, as required by IIAR 2- *Safe Design of Ammonia Refrigeration Systems* and IIAR 9 Chapter 7, *Minimum System Safety Requirements.*

3. **40 C.F.R. § 68.65 (d)(2) – Process Safety Information**
   *(d)(2) Information pertaining to the equipment in the process. (2) The owner or operator shall document that equipment complies with recognized and generally accepted good engineering practices.*

   Cargill Meat Solutions failed to properly support the piping on the roof to prevent excessive vibration and movement as required by IIAR 9, Chapter 7- *Minimum System Safety Requirements, Section 7.3.9.2.*

4. **40 C.F.R. § 68.65 (d)(2) – Process Safety Information**
   *(d)(2) Information pertaining to the equipment in the process. (2) The owner or operator shall document that equipment complies with recognized and generally accepted good engineering practices.*

   Cargill Meat Solutions failed to properly label ammonia piping, as required by the IIAR 9- Chapter 7, *Minimum System Safety Requirements.*

5. **40 C.F.R. § 68.65 (d)(2) – Process Safety Information**
   *(d)(2) Information pertaining to the equipment in the process. (2) The owner or operator shall document that equipment complies with recognized and generally accepted good engineering practices.*

   Cargill Meat Solutions failed to properly secure the engine room #2 door to the outside to be self-closing and tight fitting as required by IIAR 9, Chapter 7- *Minimum System Safety Requirements, Section 7.3.9.2.*

6. **40 C.F.R. § 68.67 (e)– Process Hazard Analysis**
*(e) The owner or operator shall establish a system to promptly address the team's findings and recommendations; assure 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*

   Cargill Meat Solutions Corporation failed to implement the "Urgency Time Period" laid out in the facility's policy to promptly address findings in the PHA.

7. **40 C.F.R. § 68.67 (e)– Process Hazard Analysis**
*(e) The owner or operator shall establish a system to promptly address the team's findings and recommendations; assure 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*

   Cargill Meat Solutions failed to promptly address the finding to "upgrade the security" in certain areas of the facility to ensure all doors and gates are self-closing and locking, as mentioned in the 2022 PHA recommendations. I observed the gate to a restricted area remained open during the facility tour.

8. **40 C.F.R. § 68.69 (c)– Operating Procedures**
*(c) The operating procedures shall be reviewed as often as necessary to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to stationary sources. The owner or operator shall certify annually that these operating procedures are current and accurate.*

   Cargill Meat Solutions failed provide dates in which all operating procedures were certified annually.

9. **40 C.F.R. § 68.69 (a)– Operating Procedures**
*(a) The owner or operator shall develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information and shall address at least the following elements.*

Cargill Meat Solutions failed to utilize the Periodic Inspection Form found in Appendix B of the Lockout/Tagout Policy.

**10. 40 C.F.R. § 68.69 (d)– Operating Procedures**

*(d) The owner or operator shall develop and implement safe work practices to provide for the control of hazards during operations such as lockout/tagout; confined space entry; opening process equipment or piping; and control over entrance into a stationary source by maintenance, contractor, laboratory, or other support personnel. These safe work practices shall apply to employees and contractor employees.*

Cargill Meat Solutions failed to develop and implement safe work practices for the Lockout/Tagout procedures for electrical equipment.

**11. 40 C.F.R. § 68.69 (d)– Operating Procedures**

*(d) The owner or operator shall develop and implement safe work practices to provide for the control of hazards during operations such as lockout/tagout; confined space entry; opening process equipment or piping; and control over entrance into a stationary source by maintenance, contractor, laboratory, or other support personnel. These safe work practices shall apply to employees and contractor employees.*

Cargill Meat Solutions failed to identify who the authorizer is for a line break permit in their policy.

**12. 40 C.F.R. § 68.71 (c)– Training**

*(c) Training documentation. The owner or operator shall ascertain that each employee involved in operating a process has received and understood the training required by this paragraph. The owner or operator shall prepare a record which contains the identity of the employee, the date of training, and the means used to verify that the employee understood the training.*

Cargill Meat Solutions failed to properly administer employee training and update corresponding training records.

**13. 40 C.F.R. § 68.73 (f)(2)– Mechanical Integrity**

*(f)Quality Assurance (2) Appropriate checks and inspections shall be performed to assure that equipment is installed properly and consistent with design specifications and the manufacturer's instructions.*

Cargill Meat Solutions failed to follow manufacturer’s recommendations to secure the evaporator fan guards.

**14. 40 C.F.R. § 68.75 (d)– Management of Change**

*(d) If a change covered by this paragraph results in a change in the process safety information required by § 68.65 of this part, such information shall be updated accordingly.*

Cargill Meat Solutions failed to update the process safety information accordingly after the replacement of the penthouse air units following the April 11, 2022 incident.

**15. 40 C.F.R. § 68.79 (d)– Compliance Audits**

*(d) 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.*

Cargill Meat Solutions failed to document a completion date and appropriate response to each of the findings in the 2020 compliance audit.

**16. 40 C.F.R. § 68.81 (f)– Incident Investigation**

*(f) The report shall be reviewed with all affected personnel whose job tasks are relevant to the incident findings including contract employees where applicable.*

Cargill Meat Solutions failed to thoroughly review and sign multiple Incident Reports to verify the information on the form used to document review with affected personnel, titled "Incident Investigation Report" was filled out correct and true.

**17. 40 C.F.R. § 68.81 (e)– Incident Investigation**

*(e) The owner or operator shall establish a system to promptly address and resolve the incident report findings and recommendations. Resolutions and corrective actions shall be documented.*

Cargill Meat Solutions failed to promptly address and resolve the incident report findings and recommendations from the incident dated July 27, 2021.

**18. 40 C.F.R § 68.85 (b)– Hot Work Permit**

*(b) The permit shall document that the fire prevention and protection requirements in 29 CFR 1910.252(a) have been implemented prior to beginning the hot work operations; it shall indicate the date(s) authorized for hot work; and identify the object on which hot work is to be performed.*

Cargill Meat Solutions failed to properly fill out the description of hot work method, tools and PPE on the hot work permits we reviewed at the time of inspection.

**19. 40 C.F.R § 68.87 (b)(4)– Contractors**

*(b) Owner or Operator Responsibilities (4) The owner or operator shall develop and implement safe work practices consistent with § 68.69(d), to control the entrance, presence, and exit of the contract owner or operator and contract employees in covered process areas.*

Cargill Meat Solutions failed to develop and implement safe work practices to control the entrance, presence, and exit of the contract owner or operator and contract employees in covered process areas which caused the release on June 11, 2020 that resulted in 6 lbs of Ammonia released to the atmosphere.

**20. 40 C.F.R. § 68.93 (a)– Emergency Response Coordination Activities**

*(a) The owner or operator of a stationary source shall coordinate response needs with local emergency planning and response organizations to determine how the stationary source is addressed in the community emergency response plan and to ensure that local response organizations are aware of the regulated substances at the stationary source, their quantities, the risks presented by covered processes, and the resources and capabilities at the stationary source to respond to an accidental release of a regulated substance; Coordination shall occur at least annually, and more frequently if necessary, to address changes: At the stationary source; in the stationary source's emergency response and/or emergency action plan; and/or in the community emergency response plan.*

Cargill Meat Solutions failed to coordinate response needs with local emergency planning and response organizations on an annual basis.

**21. 40 C.F.R. § 68.95 (a)– Emergency Response Program**

*(a) The owner or operator shall develop and implement an emergency response program for the purpose of protecting public health and the environment.*

Cargill Meat Solutions failed to utilize the “Loss of Containment Tracking Log” outlined in their Emergency Action Plan for the evaluation of releases.

EPA Region 6 inspectors Kristen Latiolais and Aimee Boss conducted a closing conference at Cargill Meat Solutions at 2:15 pm on August 8, 2024, for the inspection. During the closing conference, we explained the EPA inspection report process. At the time of this closing conference, we did not identify any areas of concern. However, we noted potential areas of concern.

## Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 11 photos taken from August 6-8, 2024
Appendix 2 – Opening and closing conference sign-in sheets