REGION 1
BOSTON, MA 02109

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 1 – NEW ENGLAND
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CAA 112 (r), Risk Management Plan (RMP), CAA § 112(r)(1) General Duty Clause (GDC), CERCLA § 103, and EPCRA §§ 302-313 Compliance Evaluation Inspection of:

Royal Ice Cream
27 Warren Street
Manchester, CT 06040

12/10/2024

Date of Inspection

Waste and Chemical Compliance Section

3/5/2025

Date Inspection Report Approved

O'Donnell, Mary Jane Digitally signed by O'Donnell, Mary Jane Date: 2025.03.05 09:23:58 -05'00'

Mary Jane O'Donnell, Manager

Waste and Chemical Compliance Section

3/5/2025

Date Inspection Report Finalized

3/5/2025

Date Inspection Report Transmitted to Facility

Disclaimer: Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make initial determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 1

EPCRA and CAA 112(r) Inspection Report

Date: March 5, 2025

From: Andrew Meyer, and Aaron Gilbert, U.S. EPA Enforcement Officers

Through: Mary Jane O'Donnell, Chief
Waste and Chemical Compliance Section

To: File

Subject: Chemical Accident Investigation and Inspection, Clean Air Act (CAA) Risk Management Plan (RMP) Section 112(r) and General Duty Clause (GDC) Section 112(r)(1) and Emergency Planning and Community Right-To-Know Act (EPCRA) Sections 302-312, and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 103 of Sysco Connecticut, LLC in Rocky Hill, CT.

I. GENERAL INFORMATION

Facility Name:	Royal Ice Cream
Dun and Bradstreet Number:	
RMP Number:	N/A
Address(es):	27 Warren Street, Manchester, CT 06040
Inspector Names:	Andrew Meyer, U.S. Environmental Protection Agency (U.S. EPA) Region 1 Aaron Gilbert, U.S. EPA Region 1 Liam Prendergast, Eastern Research Group, Inc. (ERG) Parker Hendrick, ERG
Inspection Date:	December 10, 2024
Type of Inspection:	CAA § 112(r)(7) Risk Management Program (RMP), CERCLA § 103, and EPCRA §§ 302-313 Compliance Evaluation Inspection
Purpose of Inspection:	This inspection was conducted as a routine EPA CAA § 112(r)(1) General Duty Clause (GDC), CERCLA § 103, and EPCRA §§ 302-312 compliance evaluation inspection. Sysco Connecticut, LLC in Rocky Hill, Connecticut (CT) was selected for inspection because it stores anhydrous ammonia onsite.
Current Owner:	The Royal Ice Cream Company, Incorporated
Current Operator:	The Royal Ice Cream Company, Incorporated
Primary NAICS codes:	311520 – Ice Cream and Frozen Dessert Manufacturing

Number of full-time employees (FTEs): 9 personnel on staff at the time of the inspection

Estimated Annual Sales: 1.66 million USD

Relationship to other firms, parent corporation, subsidiaries, and location of off-site facilities:

Parent Corporation: The Royal Ice Cream Company, Incorporated

II. GENERAL FACILITY DESCRIPTION

The Royal Ice Cream Facility in Manchester, CT (Royal Ice Cream, or the Facility) is a year-round manufacturer of ice cream deserts in the food services industry. The Facility also engages in final product packaging for a separate facility in both pints and half-gallon sizes. The 27 Warren Street property opened in approximately 1926 and includes a production area used to package and process ice cream, freezers cooled using the ammonia refrigeration system, an engine room (ER) containing four compressors, a separate building that contains product packaging equipment, and an outdoor area that houses a majority of the ammonia refrigeration system equipment including the High Pressure Receiver (HPR), two EVAPCO condensers, and the ammonia accumulator and intercooler.

The Royal Ice Cream Facility currently employs 9 people and operates 10 hours per day and five days week from 7:30 a.m. to 5:30 p.m. The ammonia refrigeration system is comprised of four (4) compressors located within the ER and one high pressure receiver. The ammonia refrigeration system holds a total of approximately 3,500-pounds of anhydrous ammonia. Refrigeration equipment ranges in age from 20 to 50 years. Northeast Distributors is used as the only contractor that services the ammonia refrigeration system for any significant maintenance tasks. The Facility owner James Ortifelli stated that he takes responsibility for minor repair and maintenance tasks such as equipment oil changes. The compressors are enclosed in the ER to the north of the production area within the Facility building while the remaining ammonia equipment is located outside on the east side of the Facility.

The Facility is located in a primarily residential area in Manchester, CT. Interstate I-384 is located approximately 1,250-feet north of the Facility. Attachment 1 includes a GoogleEarth® aerial photograph of the property owned/operated by Royal Ice Cream located in Manchester, CT.

III. IN-BRIEF/OPENING CONFERENCE

The U.S. EPA inspection team including Andrew Meyer, Aaron Gilbert, along with Liam Prendergast and Parker Hendrick (U.S. EPA contractor inspectors), entered the Facility at approximately 8:37 AM EST. The U.S. EPA inspection team was supported by the individuals listed in Table 1 from the Manchester Fire Department, and the Connecticut Department of Energy & Environmental Protection (CT DEEP):

Table 1. Inspection Participants, Government Agencies:

Name	Title/Company	Phone Number	E-mail
Tom Welch	CT DEEP	(860) 990-9286	thomas.e.welch@ct.gov
Rich Scalora	CT DEEP	(860) 982-0552	richard.scalora@ct.gov
Charles Morrison	CT DEEP	(860) 502-9785	charles.morrison@ct.gov
David Mauldin	Manchester Fire Marshall	(959) 647-3224	dmauldin@manchesterct.gov
Wayne Opdenbrouw	Manchester Deputy Fire Marshall	(860) 647-3224	wopdenbrouw@manchesterct.gov

The U.S. EPA inspection team presented identification to Mr. James Ortifelli, representative of Royal Ice Cream at the time of entry. Inspector Meyer subsequently conducted the In-Brief/Opening Conference, explaining the reason and scope of the inspection. Inspector Meyer presented the EPCRA Notice of Inspection form to Mr. Ortifelli, who signed as the Recipient of the Notice. Mr. Ortifelli did not attempt to deny entry to the Facility to the U.S. EPA inspection team and did not invoke any claims of Confidential Business Information (CBI) for the purposes of the inspection. Mr. Ortifelli participated in the onsite inspection as the only representative that accompanied the inspection team during the onsite interview. No Union employees work at the Facility. Mr. Ortifelli's contact information is listed in **Table 2**:

Table 2. Facility Representatives:

Name	Title/Company	Phone Number	E-mail
James Ortifelli	Royal Ice Cream	(860) 649-5358	jso@royalicecream.com

Inspector Meyer shared the following guidance documents with Facility representatives during the In-Brief/Opening Conference:

1. Guide to the Emergency Planning and Community Right-to-Know Act (Fall 2020)
2. EPCRA Quick Reference Fact Sheet (Fall 2020)
3. List of Lists (EPA 550-B-20-001, August 2020)
4. Small Business Resource Information Sheet (February 2020, EPA-300-F-20-002)
5. National Response Center Oil and Chemical Spill Reporting flyer
6. Chemicals in Your Community brochure (EPA 550-K-99-001, December 1999)

Inspector Meyer stated that after the opening meeting, the inspectors would do a walk-through inspection of all areas of the Facility where anhydrous ammonia and any other chemicals were currently present. Inspector Meyer stated the inspection team would be taking photographs of items and areas of interest and a copy of all photographs taken would be made available to the

Facility representatives after the inspection.

IV. PHYSICAL INSPECTION

The U.S. EPA inspection team conducted a walk-through of the following areas at the Facility:

1. Exterior of the Facility
2. Interior and Exterior of the ER

Inspector Gilbert took a total of 104 digital photographs during the inspection to provide reference documentation of conditions observed. The photographs are referenced throughout the document.

The following include areas of concern identified in each of the areas during the physical inspection.

Exterior of the Facility

The U.S. EPA inspection team left the office portion of the building from the entrance on the northeastern side of the second story and proceeded to the northern side of the Facility. EPA inspectors began by observing the exterior of the Facility and the fence line on the northern side of the property.

The U.S. EPA inspection team identified the following areas of concern based on a tour of the exterior of the northern side of the property.

- Windsocks were not present and/or visible from all approaches to the Facility to indicate the prevailing wind direction in the event of a release of a regulated substance. Representatives from CT DEEP and the Manchester Fire Marshall discussed and suggested locations to install windsocks at the Facility (Photographs 20241210_145108562_iOS, 20241210_151112151_iOS, 20241210_154619445_iOS, and 20241210_154706378_iOS).
- The chain link fencing located along the facility fence line surrounding the yard associated with the condensers and pipework had two exit gates; one present each in the northwestern and southeastern side of the fence line. Inspectors observed that neither exits were deemed as personnel egress gates and neither were equipped with panic hardware (Photograph 20241210_151644302_iOS).
- Inspectors observed a lack of National Fire Protection Association (NFPA) diamonds to indicate the presence of potential chemical hazards specifically in the following locations:
    - On the fence to the yard containing the system condensers and pipework (Photograph 20241210_151644302_iOS).
    - On ammonia containing vessels not located in the ER (Photographs 20241210_150255079_iOS, 20241210_150355293_iOS, and 20241210_150444244).
- The Facility had no means of securing the ammonia equipment located outside of the ER. The majority of the ammonia refrigeration system equipment, including two condensers, the HPR, and ammonia accumulator and intercooler, were present outside of the Facility building

on the northeastern edge, adjacent to freezers used to store product (Photograph 20241210_145108562_iOS).

- While observing from ground-level, inspectors observed pressure relief valve (PRV) header piping on the roof and at ground level directed to discharge in a downward direction (Photographs 20241210_145829760_iOS, 20241210_145833376_iOS, 20241210_150007813_iOS, 20241210_150159039_iOS, 20241210_150255079_iOS, and 20241210_151112151_iOS).
- Inspectors observed PRV discharge piping terminated below adjacent roof levels and in close proximity to the adjacent building exterior wall (Photographs 20241210_145829760_iOS, 20241210_145833376_iOS, 20241210_150007813_iOS, and 20241210_150159039_iOS).
- Used oil was observed to be actively stored in an open 5-gallon bucket adjacent to the Oil Still located outside of the ER.
- Inspectors observed tags attached to PRVs on vessels not located within the ER, with dates of installation in 2017, indicating that the PRVs were in active use past the five-year required replacement date (Photograph 20241210_151318054_iOS).
- A lack of labeling indicating direction, phase, and contents was observed on ammonia piping throughout the Facility. Specifically, inspectors noted a lack of sufficient pipe labeling within the ER, and in the area outside of the building containing the condensers and other ammonia equipment. Additionally, there was a general lack of identification for valves associated with the ammonia system (Photographs 20241210_150159039_iOS, 20241210_150255079_iOS, 20241210_150355293_iOS, 20241210_150419293_iOS, 20241210_151007342_iOS, 20241210_152622268_iOS, 20241210_152632205_iOS, 20241210_152731748_iOS, 20241210_152735813_iOS, 20241210_153146747_iOS, 20241210_154146000_iOS, and 20241210_154312000_iOS).
- Ice build-up was observed on ammonia piping, encasing valves, on oil pots, and underneath insulation on pressure vessels in multiple areas throughout the Facility. Specifically, inspectors observed locations on ammonia equipment not located in the ER where insulation and/or vapor barriers were compromised such that ice build-up was occurring underneath the existing insulation (Photographs 20241210_145742111_iOS, 20241210_150537962_iOS, 20241210_150659239_iOS, 20241210_151205420_iOS, 20241210_151234500_iOS, 20241210_151452549_iOS, 20241210_152614995_iOS, 20241210_152632205_iOS, 20241210_152641880_iOS, 20241210_152703700_iOS, and 20241210_153754418_iOS).
- The manual King Valve located directly above the HPR contained no labeling to indicate its location in the case that the remotely activated King Valve, located immediately downstream of the manual valve, was not operational during a time of emergency (Photographs 20241210_150355293_iOS and 20241210_150419293_iOS).
- Inspectors observed sections of piping throughout the Facility that were inadequately supported/secured and/or supported by other ammonia piping, ammonia piping that was supported by visibly failing supports, ammonia piping supported by wooden supports, ammonia piping that was vibrating excessively due to a lack of supporting equipment, and ammonia piping that was sagging due to a general lack of adequate support (Photographs 20241210_145420165_iOS, 20241210_145816777_iOS, 20241210_145913265_iOS, 20241210_145924391_iOS, 20241210_145928159_iOS, 20241210_145937355_iOS, 20241210_150007813_iOS, 20241210_150116528_iOS, 20241210_150419293_iOS ,

20241210_150444244_iOS, 20241210_150745432_iOS, 20241210_151007342_iOS, 20241210_152632205_iOS, 20241210_152731748_iOS, 20241210_153030000_iOS, 20241210_153047000_iOS, 20241210_153202000_iOS, 20241210_153215000_iOS, 20241210_154136000_iOS, 20241210_154146000_iOS, 20241210_154151000_iOS, 20241210_154202251_iOS, 20241210_154230000_iOS, and 20241210_154312000_iOS).

- Areas of localized corrosion were observed on ammonia piping, valves, and ammonia refrigeration equipment in the ER and throughout the rest of the Facility. Specifically, inspectors noted areas of localized corrosion in the following areas:
    - Outside of the ER on the bottom of the HPR (Photographs 20241210_150745432_iOS, 20241210_150839938_iOS, and 20241210_150912228_iOS)
    - Ammonia piping and valves located outside of the ER (Photographs 20241210_145420165_iOS, 20241210_150038722_iOS, 20241210_150419293_iOS, 20241210_151205420_iOS, 20241210_151234500_iOS, and 20241210_151251067_iOS)
- Inspectors observed a lack of protection from incidental contact on high pressure ammonia piping located beneath the HPR and ammonia piping beneath the ammonia accumulator (Photographs 20241210_145742111_iOS, 20241210_150255079_iOS, 20241210_150706793_iOS, and 20241210_150745432_iOS).
- Inspectors observed that the two raised EVAPCO condensers were not secured to the foundation they were located on, adjacent to the HPR (Photographs 20241210_150444244_iOS and 20241210_151112151_iOS).
- Inspectors observed two unmarked vessels that were described to the inspection team as oil containers observed to be present on a questionable foundation and additionally not secured to the foundation. These oil containers were present in close proximity to the ammonia system and could potentially contact ammonia piping if the foundation below the containers fails (Photographs 20241210_145816777_iOS and 20241210_151007342_iOS).

Interior and Exterior of the Engine Room

The U.S. EPA inspection team accessed the ER using the overhead door, marked as the main entrance, at the southern side of the Facility.

The U.S. EPA inspection team identified the following areas of concern based on a tour of the ER.

- Inspectors observed the absence of both audible and visual alarm indicators outside of the main entrance to the ER (Photographs 20241210_152109984_iOS and 20241210_152120053_iOS).
- On approach to the ER, the overhead roll-up door was not locked to create a restricted access area (Photograph 20241210_152109984_iOS).
- Inspectors observed a lack of National Fire Protection Association (NFPA) diamonds to indicate the presence of potential chemical hazards specifically on entrances to the ER from both the production area and the overhead roll-up door (Photographs 20241210_152109984 and 20241210_152829425_iOS).

- Inspectors did not observe signage posted near the primary entry door to the ER with instructions for shutting down the refrigeration system in an emergency, the name and telephone numbers of the refrigeration operating and maintenance staff, the quantity of ammonia in the system, the type of oil in the system and the high and low-side design pressures, or to alert entrants of the presence of ammonia within the room (Photographs 20241210_152109984_iOS and 20241210_152120053_iOS).
- The emergency safety shower within the overhead roll-up door entrance of the ER did not have a tag for recording the testing of the system (Photograph 20241210_152523853_iOS).
- During the facility walk-through, the inspection team observed the door to the production area from the ER was not adequately sealed, the door was not equipped with panic hardware, and the door was not affixed with appropriate chemical hazard signage indicating the presence of ammonia (Photograph 20241210_152915772_iOS).
- Inspectors observed a Lock-Out/Tag-Out group lock tag present on an electrical box associated with the compressors with no locks to prevent the removal of the group lock tag (Photograph 20241210_152807015_iOS).
- Inspectors observed that the ER contained a single ammonia detector while other locations that contained ammonia equipment, specifically the production area and the outdoor area containing the condensers and other ammonia equipment, did not contain any ammonia detectors (Photographs 20241210_152731748_iOS and 20241210_153334567_iOS).
- Inspectors observed an active workspace within the ER that contained work benches, spare parts, and boxes. Additionally, flammable materials were stored within the ER including compressor oil drums and a cylinder of oxygen (Photographs 20241210_153648134_iOS, 20241210_153718016_iOS, 20241210_153733137_iOS, 20241210_153743393_iOS, 20241210_153827661_iOS, 20241210_153840999_iOS, 20241210_153900234_iOS, and 20241210_153907917_iOS).
- The control panels at the Facility were within the ER containing alarm readouts and controls on electrical boxes that are unmarked as to designate their contents (i.e. high voltage) (Photographs 20241210_153827661_iOS and 20241210_153840999_iOS).
- Inspectors observed that miscellaneous items within the ER were actively stored directly in front of electrical panels used to control the ammonia system (Photographs 20241210_153827661_iOS, 20241210_153840999_iOS, and 20241210_153900234_iOS).
- Within the ER, Chlorinated Manual Cleaner (SULL_TECH 1160) and Foaming Chlorine Detergent (ALPHA 1170) were not actively stored within secondary containment (Photographs 20241210_153733137_iOS, 20241210_153743393_iOS, and 20241210_153748842_iOS).

V. OUT-BRIEF/CLOSING CONFERENCE

An in-person out-brief/closing conference was conducted at the conclusion of the onsite inspection. Inspector Meyer and the remainder of the EPA Inspection Team discussed some preliminary concerns based on the walkthrough of the Facility. After reviewing preliminary observations, Inspector Meyer discussed additional document requests, and explained the next steps in the enforcement process.

The following areas of concern were presented in the List of Areas of Concern provided to Royal

Ice Cream:

1. Windsocks were not present and/or visible from all approaches to the Facility to indicate the prevailing wind direction in the event of a release of a regulated substance. Representatives from CT DEEP and the Manchester Fire Marshall discussed and suggested locations to install windsocks at the Facility (Photographs 20241210_145108562_iOS, 20241210_151112151_iOS, 20241210_154619445_iOS, and 20241210_154706378_iOS).
2. The Facility had no means of securing the ammonia equipment located outside of the ER. The majority of the ammonia refrigeration system equipment, including two condensers, the High-Pressure Receiver (HPR), and ammonia accumulator and intercooler, was present outside of the Facility building on the northeastern edge, adjacent to freezers used to store product (Photograph 20241210_145108562_iOS).
3. Inspectors observed PRV discharge piping terminated below adjacent roof levels and in close proximity to the adjacent building exterior wall (Photographs 20241210_145829760_iOS, 20241210_145833376_iOS, 20241210_150007813_iOS, and 20241210_150159039_iOS).
4. Inspectors observed tags attached to PRVs on vessels not located within the ER, with dates of installation in 2017, indicating that the PRVs were in active use past the five-year required replacement date (Photograph 20241210_151318054_iOS).
5. A lack of labeling indicating direction, phase, and contents was observed on ammonia piping throughout the Facility. Specifically, inspectors noted a lack of sufficient pipe labeling within the ER, and in the area outside of the building containing the condensers and other ammonia equipment. Additionally, there was a general lack of identification for valves associated with the ammonia system (Photographs 20241210_150159039_iOS, 20241210_150255079_iOS, 20241210_150355293_iOS, 20241210_150419293_iOS, 20241210_151007342_iOS, 20241210_152622268_iOS, 20241210_152632205_iOS, 20241210_152731748_iOS, 20241210_152735813_iOS, 20241210_153146747_iOS, 20241210_154146000_iOS, and 20241210_154312000_iOS).
6. Ice build-up was observed on ammonia piping, encasing valves, on oil pots, and underneath insulation on pressure vessels in multiple areas throughout the Facility. Specifically, inspectors observed locations on ammonia equipment not located in the ER where insulation and/or vapor barriers were compromised such that ice build-up was occurring underneath the existing insulation (Photographs 20241210_145742111_iOS, 20241210_150537962_iOS, 20241210_150659239_iOS, 20241210_151205420_iOS, 20241210_151234500_iOS, 20241210_151452549_iOS, 20241210_152614995_iOS, 20241210_152632205_iOS, 20241210_152641880_iOS, 20241210_152703700_iOS, and 20241210_153754418_iOS).
7. The manual King Valve located directly above the HPR contained no labeling to indicate its location in the case that the remotely activated King Valve, just downstream of the manual valve, was not operational during a time of emergency (Photographs 20241210_150355293_iOS and 20241210_150419293_iOS).
8. Inspectors observed a lack of protection from incidental contact on high pressure ammonia piping located beneath the HPR and ammonia piping beneath the ammonia accumulator (Photographs 20241210_145742111_iOS, 20241210_150255079_iOS, 20241210_150706793_iOS, and 20241210_150745432_iOS).

9. Areas of localized corrosion were observed on ammonia piping, valves, and ammonia refrigeration equipment in the ER and throughout the rest of the Facility. Specifically, inspectors noted areas of localized corrosion in the following areas:
    - Outside of the ER on the bottom of the HPR (Photographs 20241210_150745432_iOS, 20241210_150839938_iOS, and 20241210_150912228_iOS)
    - Ammonia piping and valves located outside of the ER (Photographs 20241210_145420165_iOS, 20241210_150038722_iOS, 20241210_150419293_iOS, 20241210_151205420_iOS, 20241210_151234500_iOS, and 20241210_151251067_iOS)
10. The emergency safety shower within the overhead roll-up door entrance of the ER did not have a tag for recording the testing of the system (Photograph 20241210_152523853_iOS).
11. Inspectors observed the absence of both audible and visual alarm indicators outside of the main entrance to the ER (Photographs 20241210_152109984_iOS and 20241210_152120053_iOS).
12. On approach to the ER, the overhead roll-up door was not locked to create a restricted access area (Photograph 20241210_152109984_iOS).
13. Inspectors did not observe signage posted near the primary entry door to the ER with instructions for shutting down the refrigeration system in an emergency, the name and telephone numbers of the refrigeration operating and maintenance staff, the quantity of ammonia in the system, the type of oil in the system and the high and low-side design pressures, or to alert entrants of the presence of ammonia within the room (Photographs 20241210_152109984_iOS and 20241210_152120053_iOS).
14. During the facility walk-through, the inspection team observed the door to the production area from the ER was not adequately sealed, the door was not equipped with panic hardware, and the door was not affixed with appropriate chemical hazard signage indicating the presence of ammonia (Photograph 20241210_152915772_iOS).
15. Inspectors observed that the ER contained a single ammonia detector while other locations that contained ammonia equipment, specifically the production area and the outdoor area containing the condensers and other ammonia equipment, did not contain any ammonia detectors (Photographs 20241210_152731748_iOS and 20241210_153334567_iOS).
16. Inspectors observed an active workspace within the ER that contained work benches, spare parts, and boxes. Additionally, flammable materials were stored within the ER including compressor oil drums and a cylinder of oxygen (Photographs 20241210_153648134_iOS, 20241210_153718016_iOS, 20241210_153733137_iOS, 20241210_153743393_iOS, 20241210_153827661_iOS, 20241210_153840999_iOS, 20241210_153900234_iOS, and 20241210_153907917_iOS).
17. Inspectors observed that miscellaneous items within the ER were actively stored directly in front of electrical panels used to control the ammonia system (Photographs 20241210_153827661_iOS, 20241210_153840999_iOS, and 20241210_153900234_iOS).
18. Within the ER, Chlorinated Manual Cleaner (SULL_TECH 1160) and Foaming Chlorine Detergent (ALPHA 1170) were not actively stored within secondary containment

(Photographs 20241210_153733137_iOS, 20241210_153743393_iOS, and 20241210_153748842_iOS).

VI. FACILITY COMPLIANCE STATUS AND ELEMENTS OF PROOF - EPCRA

EPCRA Section 302

(1**)** Does Facility have onsite, at any one time, extremely hazardous substances (EHS) at or above the TPQ?
At the time of the inspection, anhydrous ammonia was present.

(2) List or obtain documentation: Inspectors' observations; information provided by Facility personnel.

(3) How was maximum quantity onsite determined or calculated?
Inspectors' observations; information provided by Facility personnel.

EPCRA Section 303
(1) Facility Coordinator identified per Sec. 303 and date LEPC was notified?
Unknown.

EPCRA Section 311
(1) Is Facility required to maintain MSDSs under the OSHA Hazard Communication Standard 29 CFR 1910.1200 (no specific chemical list)? Yes.

(2) Has the Facility conducted a comprehensive audit to identify MSDS chemicals onsite and to determine if 500 lb./10,000 lb./TPQ thresholds were exceeded? Yes, 3,500-pounds anhydrous ammonia.

(3) List of OSHA chemicals manufactured, processed, used/stored, and obtained?
At the time of the inspection, anhydrous ammonia was present above the Threshold Quantity (TQ).

(4) How were the maximum amounts determined?
Onsite interviews.

(5) Section 311 info supplied to the:

SERC (Y/N):	Unknown
LEPC (Y/N):	Unknown
Local Fire Department(Y/N):	Unknown
Date	Unknown
Chemical List	Unknown
SDSs	Unknown

(6) Have any new hazardous chemicals, mixtures, or substances been introduced into the Facility in the last 5 years? Unknown.

(7) If yes, has the Facility submitted updated lists or MSDSs? Unknown.

EPCRA Section 312 (due March 1 of year following reporting calendar year)
(1) Was Tier II form submitted for all required chemicals?
Unknown.

(2) What procedures are used to update Section 312 information for annual submittal and to ensure additional or new chemical data is submitted within 90 days? Unknown

(3) Was Facility aware of annual reporting requirements under Section 312? Unknown

(4) Had the Facility completed and signed a list of all reportable chemicals on site on date of the inspection?
Unknown.

(5) Table of EPCRA 312 Reportable Substances:

CAS #	Chemical	Approx. Max. Wt. on Site (Lbs.)	TPQ (Lbs.)	Approx. Ratio (Actual/TPQ)
7664-41-7	Ammonia (Anhydrous)	3,500	500	7.0

Source: Inspectors' observations; information provided by Facility personnel; 2023 Tier II form

VII. ENFORCEMENT HISTORY

Data available via ECHO indicates that the Facility does not have a history of environmental enforcement in relation to the metrics summarized via U.S. EPA's database.

VIII. ENVIRONMENTAL JUSTICE

The ECHO and EJSCREEN data indicate that the Facility is not in an area of Environmental Justice (EJ) interest based on the levels shown for relevant EJ indices.

Attachment 1

Google Earth Image of the
Royal Ice Cream Facility in Manchester, CT