



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: Fresca Mexican Foods LLC
Physical Address: 2009 Smeed Parkway, Caldwell, Idaho 83605
Phone Number: 208-376-6922
Latitude/Longitude: 43.652789/-116.642320
RMP Facility ID#: 100000237941
FRS ID#: 110070200838
EJ Concerns: Yes (Above 80%)

CONTACT INFORMATION (RMP Implementation):

Name: Rich Tuttle
Phone Number: 208-376-6922
E-mail: rtuttle@frescamex.com

EMERGENCY CONTACT INFORMATION:

Name: Rich Tuttle
Phone (24-hr): 208-870-8009
E-mail: rtuttle@frescamex.com

TRIP DETAILS:

Inspection Date: April 12, 2023
Inspection Time: 0900 through 1150
Inspection Team: Terry Garcia, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Peter Phillips, US EPA Region 10 SEE Grantee, RMP Inspector
Edward Johannes, US EPA Region 10 SEE Grantee, RMP Inspector
Kenneth Valder, Weston Solutions, Inc., EPA START Contractor

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: February 23, 2018
Date of Latest Update: February 21, 2023

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.)
1000129872	Refrigeration System	1000162796	1000131304	3	Ammonia, Anhydrous (7664-41-7)	15,000

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 of the Code of Federal Regulations (CFR) Part 68, Chemical Accident Prevention Provisions.

The facility has been previously inspected in the past 5 years: No ☒ Yes ☐

If Yes, Date of Last Inspection:

The facility is High Risk: No ☒ Yes ☐

Joint EPCRA inspection: No ☐ Yes ☒

CAA Title V Air Permit:

Does the facility have a CAA Title V Permit? No ☒ Yes ☐

If Yes, Permit Number:

RELEASE/ACCIDENT HISTORY:

Did the facility have a reportable release in the past 5 years? No ☒ Yes ☐

If Yes, Date and Description of the Release:

EPCRA TIER II REPORTING:

Did the facility submit the 2022 Tier II report to the SERC? No ☐ Yes ☒

Date the Tier II was submitted: 02/24/2023

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: 02/24/2023

INSPECTION ENTRY:

Terry Garcia led the inspection. EPA arrived at the facility at 0900 and was joined by the following facility personnel:

Name	Title, Organization
Richard Tuttle	EH&S Coordinator
Brett Carlock	Refrigeration Manager
Paul Sturdivant	Vice President, Operations
<i>Mr. Sturdivant joined the entry meeting briefly</i>	

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: Caldwell Fire

Facility representatives escorted EPA to the facility's Training Room within the administrative area of the plant. Lead Inspector Garcia introduced the EPA inspection team, 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. Mr. Tuttle 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:

An employee representative present during the facility visit:

No ☒

Yes ☐

If Yes, Name/Title:

GENERAL INFORMATION:

The facility is regulated under the RMP Rule as a Program Level 3 facility owned and operated by Fresca Mexican Foods, LLC (Fresca). At this facility, Fresca manufactures a variety of fresh tortillas on four production lines; the tortillas are packaged, flash frozen, and stored in warehouse freezers on site before they are distributed from the truck docks at the facility. Within the 200,000-square-foot facility, Fresca manufactures 5 million tortillas on four production lines each year.

Fresca moved operations from Boise, Idaho to this location in 2018, and the facility has been operational since then. About 265 staff work two 12-hour shifts around the clock Monday through Friday; currently, the facility is increasing operations to 7 days a week.

The Fresca facility is regulated because of its use of anhydrous ammonia in a closed-loop refrigeration system; the system is permitted for 15,000 pounds of ammonia. The system delivers cold air to three spiral freezers on the production floor as well as a raw goods warehouse, finished product warehouse, and loading docks.

The refrigeration system consists of seven ammonia compressors (C-1 through C-7) located in the Engine Room. Other refrigeration equipment contained in the Engine Room include the high-pressure receiver (HPR) tank (V-1); high-temperature Accumulator Tank (V-2), Spiral low-pressure receiver (LPR) tank (V-4), and Freezer LPR tank (V-6). Safety equipment in the Engine Room includes ammonia sensors and alarms, emergency ventilation via wall intake louvers and a ceiling exhaust fan, and an eyewash/shower station. One condenser bank with three condenser units is located outside the Engine Room on an elevated structure. Cooled process and storage areas feature ceiling mounted evaporators. Operation of the regulated system is conducted by Mr. Carlock. A contractor, Kemper Northwest, provides major modifications, conducts annual maintenance, and services ammonia

detectors; Kemper Northwest also is available for operational support. Power Engineering also supports major modifications. iWorkWise supports compliance and training activities.

During the inspection, Fresca personnel stated that a fourth process line and Spiral Freezer are to be added soon; this change will require modification to the refrigeration system.

ON-SITE OBSERVATIONS:

After the entry meeting, EPA toured the facility from approximately 0945 to 1035, escorted by facility representatives Mr. Tuttle and Mr. Carlock. The EPA inspection team took photographs of the regulated refrigeration system and associated Control Room, finished product freezers and loading docks, Chemical Storage Room, and Electric Vehicle (EV) charging area.

The tour began on the Production Floor, where the spiral freezers SF-1 through SF-3 are located (photos 1-3). These freezers chill fresh product (tortillas) after they are packaged and before they are bulked. EPA inspected the Cooler, where product is stored prior to shipment from the Cool Dock. The team observed ceiling-mounted evaporator units that service the Cooler (photo 4).

Next, the inspection team toured the support area, including Janitorial Supply, Chemical Storage Room, and Electrical Room. Outside Chemical Storage Room is a tag rack for labeling chemicals in use throughout the facility (photo 5). The Chemical Storage Room houses EPCRA-regulated chemicals utilized in facility operations and cleaning (photos 6-7). Fresca provides its employees with an emergency shower/eyewash station in Chemical Storage Room (photo 8).

EPA observed the Sanitation Room which houses the Logix controller for the refrigeration equipment, including the system overview (photo 9) and refrigeration system (photo 10) status screens. Fresca stores Standard Operating and Maintenance Procedures in two binders located at the Sanitation Room workstation (photo 11). SOPs also are available through the facility's intranet.

EPA inspected the Engine Room (photo 12). Audible and visual alarms are located on the north interior entry to the Engine Room, as are manual emergency ventilation and equipment kill switches (photo 20). The inspection team identified four ammonia detectors in the Engine Room (e.g., photo 13); the room is equipped with ammonia audible (horn) and visual (strobe) alarms (photo 14). Within the Engine Room are compressors C-1 through C-7 (photos 15-18). Compressor C-4 was observed to be locked and tagged out (photo 19-21). EPA observed safety relief valve (SRV) tags to verify compliance with periodic replacement requirements (photos 22-23), and logic controllers for each operational compressor were observed (photo 24). Several SRVs were scheduled to be replaced in March 2023 but were overdue; facility representatives claim that valves are back-ordered due to supply chain issues. Other refrigeration system tanks located in the Engine Room include the high-pressure receiver and ammonia recirculation system in the northwest corner (photo 25), as well as the relief/diffuser tank and auto-purger in the southeast corner (photo 26). The overhead emergency ventilation fan (photo 27) was not engaged during the inspection, and the air intake louvers on the south wall were closed (photo 16). On the northern wall of the Engine Room are the electrical panels as well as an emergency shower/eyewash station (photo 28).

Outside near Door 15 on the east side of the Engine Room, EPA observed an emergency eyewash station as well as an ammonia release alarm (audible and visual) (photo 29). Outside Door 17 on the south side of the room are located emergency shutdown button and ventilation switches, ammonia alarms, ammonia system monitor indicators and emergency pressure control system indicators (photo 30). The condenser bank servicing the Engine Room is located on an elevated structure outside of Door

15 (photo 31). A windsock is situated east of the Engine Room (photo 32); further to the east is another windsock unrelated to the facility at Capital Distributors.

EPA observed the EV charging area in the Dry Warehouse. The lead-acid batteries associated with the charging stations are regulated under EPCRA. Fresca has equipped this area with an emergency shower/eyewash station (photo 33).

EPA observed evaporators in the Freezer (photos 34-37) and returned to the Engine Room to document additional components including pressure gauges, the portable compressor oil recycling system, compressors, ammonia lines and valves, high pressure receiving tanks, emergency eye wash stations, and ammonia system controls (photos 38-44).

Throughout the tour, EPA observed ammonia sensors and alarms and warning systems associated with the Production Floor, Cooler, Cool Dock, and Engine Room (photos 13, 14 and 44).

Photographs taken during the inspection are included in Attachment A to this report and are referenced in the following narrative.

After the tour was complete at 1035, EPA returned to the Training Room to review RMP documentation. After the document review, EPA provided a debriefing to facility representatives Mr. Tuttle and Mr. Carlock. The exit briefing was conducted at 1140 hours and was complete at 1150, when EPA representatives exited the facility.

INFORMATION COLLECTED FROM FACILITY:

1. Sign-In Sheet
2. PSM Compliance Audit Report/Recommendations 2021
3. 2023 PHA Findings and Recommendations

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

1. **Mechanical Integrity, 68.73(d)(2):** Several safety relief valves (SRVs) were scheduled to be replaced in March 2023 but are late for replacement due to supply issues. Facility representatives stated this is related to a supply chain issue and presented vendor quotations to support this statement.
2. **Training, 68.71(b):** HAZWOPER refresher training was late for Mr. Tuttle; facility representatives state this is due to continuing impacts from the COVID-19 pandemic.
3. **Pre-startup Review, 68.77(a):** A Pre-Startup Safety Review (PSSR) was not conducted to support a 2019 process modification (change) on a spiral freezer (upgraded suction).
4. **Emergency Response, 68.180(a):** Fresca's RMP does not contain phone number and email address for Canyon County Local Emergency Planning Committee (LEPC). No documentation exists for the most recent coordination with the LEPC.

DOCUMENTS REQUESTED NOT INCLUDED IN REPORT:

The inspection team did not request additional documentation during the site inspection.

INSPECTION REPORT CERTIFICATION:

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

Terry Garcia

Inspector Signature

Digitally signed by Terry Garcia

Date: 2023.07.31 12:05:17

-07'00'

JAVIER MORALES

Digitally signed by JAVIER MORALES

Date: 2023.07.31 15:16:25 -07'00'

RMP Coordinator/Approval

ERIN WILLIAMS

Digitally signed by ERIN WILLIAMS

Date: 2023.08.01 09:09:33 -07'00'

EPCRA Coordinator/Approval

MATTHEW QUARTERMAN

Digitally signed by MATTHEW
QUARTERMAN

Date: 2023.08.01 13:25:16 -07'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: Fresca Mexican Foods
City, State: Caldwell, ID
Photographer: Ken Valder, Weston Solutions

File	Photo Layout ID	Date	Time	Description
IMG_5305	1	4/12/2023	9:58 AM	Production floor; Spiral freezer 1
IMG_5306	2	4/12/2023	9:58 AM	Production floor; Spiral freezers 2 (near left) and 3 (far right)
IMG_5308	3	4/12/2023	9:59 AM	Production floor; Spiral freezer 2 evaporator door
IMG_5312	4	4/12/2023	10:04 AM	Freezer (cooler); AU-1 evaporator
IMG_5353	5	4/12/2023	10:26 AM	Chemical storage room; Chemical tag rack (outside room)
IMG_5313	6	4/12/2023	10:04 AM	Chemical storage room; Boost 3201 SM (EPCRA chemical)
IMG_5314	7	4/12/2023	10:04 AM	Chemical storage room; Boost 3201 SM (EPCRA chemical)
IMG_5315	8	4/12/2023	10:04 AM	Chemical storage room; Shower and eye wash
IMG_5316	9	4/12/2023	10:05 AM	Sanitation room (janitorial supply); Logix controller; Ammonia monitoring
IMG_5317	10	4/12/2023	10:05 AM	Sanitation room (janitorial supply); Logix controller; Ammonia system
IMG_5318	11	4/12/2023	10:06 AM	Sanitation room (janitorial supply); Logix controller, SOPs, maintenance records
IMG_5320	12	4/12/2023	10:16 AM	Refrigeration Machinery Room (Engine Room); Interior entrance
IMG_5321	13	4/12/2023	10:16 AM	Refrigeration Machinery Room (Engine Room); Ammonia monitors on high-pressure receiver
IMG_5330	14	4/12/2023	10:22 AM	Refrigeration Machinery Room (Engine Room); Ammonia warning system above air intake louvers
IMG_5323	15	4/12/2023	10:17 AM	Refrigeration Machinery Room (Engine Room); Overview from interior entrance; Compressors 4 (near) through 1 (far)
IMG_5324	16	4/12/2023	10:17 AM	Refrigeration Machinery Room (Engine Room); Overview from interior entrance
IMG_5325	17	4/12/2023	10:17 AM	Refrigeration Machinery Room (Engine Room); Overview from interior entrance; Compressors 5 (near) through 7 (far)
IMG_5326	18	4/12/2023	10:22 AM	Refrigeration Machinery Room (Engine Room); Overview from interior entrance; Compressor 5 and overhead door
IMG_5338	19	4/12/2023	10:23 AM	Refrigeration Machinery Room (Engine Room); Compressor 4 (locked out); High-pressure receiver tank with king valve
IMG_5339	20	4/12/2023	10:23 AM	Refrigeration Machinery Room (Engine Room); Compressor 4 lock-out tag
IMG_5340	21	4/12/2023	10:23 AM	Refrigeration Machinery Room (Engine Room); Compressor 4 lock-out lock
IMG_5333	22	4/12/2023	10:22 AM	Refrigeration Machinery Room (Engine Room); Compressor 7 safety relief valve installation tags (expired)
IMG_5334	23	4/12/2023	10:22 AM	Refrigeration Machinery Room (Engine Room); Compressor 7 safety relief valve installation tags (expired); close-up
IMG_5329	24	4/12/2023	10:22 AM	Refrigeration Machinery Room (Engine Room); Compressor 2 control screen
IMG_5322	25	4/12/2023	10:16 AM	Refrigeration Machinery Room (Engine Room); High-pressure receiver, ammonia recirculation system
IMG_5335	26	4/12/2023	10:23 AM	Refrigeration Machinery Room (Engine Room); Compressor 7, relief/diffuser tank, auto-purger
IMG_5342	27	4/12/2023	10:23 AM	Refrigeration Machinery Room (Engine Room); Exhaust fan over high pressure receiver tank
IMG_5341	28	4/12/2023	10:23 AM	Refrigeration Machinery Room (Engine Room); Electrical panel, shower/eyewash to left
IMG_5345	29	4/12/2023	10:23 AM	Refrigeration Machinery Room (Engine Room); Exterior door 15, eyewash, alarms
IMG_5346	30	4/12/2023	10:22 AM	Refrigeration Machinery Room (Engine Room); Exterior door 17, ammonia system controls
IMG_5349	31	4/12/2023	10:22 AM	Refrigeration Machinery Room (Engine Room); Exterior condenser
IMG_5351	32	4/12/2023	10:26 AM	Building exterior; Windsock east of facility; Note windsock at neighboring facility to east
IMG_5354	33	4/12/2023	10:29 AM	Dry warehouse; EV battery charging station, shower/eyewash
IMG_5309	35	4/12/2023	10:04 AM	Freezer (cooler); AU-1 evaporator
IMG_5310	36	4/12/2023	10:04 AM	Freezer (cooler); AU-1 evaporator
IMG_5311	37	4/12/2023	10:04 AM	Freezer (cooler); AU-1 evaporator
IMG_5327	38	4/12/2023	10:22 AM	Refrigeration Machinery Room (Engine Room); Pressure gauges
IMG_5331	39	4/12/2023	10:22 AM	Refrigeration Machinery Room (Engine Room); Portable compressor oil recycling system
IMG_5332	40	4/12/2023	10:22 AM	Refrigeration Machinery Room (Engine Room); Compressor 7 safety relief valve installation tags (expired); close-up
IMG_5337	41	4/12/2023	10:23 AM	Refrigeration Machinery Room (Engine Room); Compressor 4 (locked out); High-pressure receiver tank with king valve
IMG_5343	42	4/12/2023	10:23 AM	Refrigeration Machinery Room (Engine Room); Shower/eyewash
IMG_5344	43	4/12/2023	10:23 AM	Refrigeration Machinery Room (Engine Room); Shower/eyewash
IMG_5347	44	4/12/2023	10:22 AM	Refrigeration Machinery Room (Engine Room); Exterior door 17, ammonia system controls (close-up)