Clean Air Act - Section 112(r)
Risk Management Program
and EPCRA 312 – Tier II
Facility Desk Audit Report

FACILITY INFORMATION:

Name: Lamb Weston Twin Falls Facility
Physical Address: 856 Russet Street Twin Falls Idaho 83301
Phone Number: (208) 825-1498
Latitude/Longitude: 42.552281/ -114.483081
EPA Facility ID# 1000 0002 7115

CONTACT INFORMATION (RMP Implementation):

Name: Andrew Gardner, Plant Manager
Phone Number: (208) 825-1579
E-mail: andrew.gardner@lambweston.com

EMERGENCY CONTACT INFORMATION:

Name: Reece Moore, Engineering Manager
Phone (24-hr): (515) 451-3072
E-mail: reece.moore@lambweston.com
Website: https://www.lambweston.com/

AUDIT DETAILS:

Contact Date: August 23, 2022
Inspectors: Terry Garcia, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Mhara Coffman US EPA Region, 10 RMP Inspector In-Training

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: June 11, 1999
Date of Latest Update: May 9, 2022

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)
1000120911	Line 2 & Line 3	1000151353	311411	3	Ammonia, Anhydrous (7664-41-7)	55,000
1000120912	Line 1 & Line 4	1000151354	311411	3	Ammonia, Anhydrous (7664-41-7)	60,000

PURPOSE:

The purpose of this document review was to determine whether 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 and compliance with Section 312 of the Emergency Planning and Community Right to Know Act (EPCRA) which requires the Tier II Chemical Inventory Reports to be submitted annually. EPA Region 10 RMP inspectors are conducting offsite compliance monitoring when warranted for the RMP facility.

- The facility has been previously inspected in the past 5 years: No ☒ Yes ☐
  If Yes, Date of Last Inspection:
- Is the emergency contact information current? No ☐ Yes ☒
- The facility is High Risk: No ☐ Yes ☒

- Joint EPCRA inspection: No ☐ Yes ☒

CAA Title V Air Permit:
Does the facility have a CAA Title V Permit? No ☐ Yes ☒
If Yes, Permit Number: P-2011.0120

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 their [Enter Year] Tier II report to the SERC? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: 2/28/22
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: 2/28/22

GENERAL INFORMATION:
The facility is regulated under the Risk Management Program as a Program Level 3 process and is owned and operated by Lamb Weston Twin Falls Facility. The Twin Falls, Idaho processing facility produces various potato products such as French fries, mashed potatoes, hash browns ,and formed potato products. The plant site consists of a main processing plant, raw potato storage building, boiler/refrigeration facility, primary and secondary water treatment facility, and refrigerated cold storage. Activities are conducted at this site during all months of the year. The covered processes at the facility are closed loop anhydrous ammonia refrigeration systems. The ammonia refrigeration systems allow the finished products to be quickly cooled and frozen. There are two independent refrigeration systems at the facility, both of which have more than the Threshold Quantity (TQ) of anhydrous ammonia]. Lines 2 & 3 is 55,000 lbs. of anhydrous ammonia. Lines 1 & 4 ammonia quantity is 60,000 lbs. There are 650 full-time employees on site.

INFORMATION REQUESTED FROM FACILITY:

1. **Process Hazard Analysis** – A copy of the last two PHAs with recommendations and tracking sheets.
2. **Compliance Audit** – **Training** – Training records for each process operator
    a. **Initial Training Records**: Training in the overview of the process and in the operating procedures, emphasis on the specific safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks.
    b. **Refresher Training Records**: Training of each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process.
    c. **Training Documentation:** Records which contains the identity of the employee, the date of training, and the means used to verify that the employee understood the training.
    d. **Annual Certification**: Annual operating procedures certification and review.
    e. Fill in **Facility Training Summary** sheet.

3. **Emergency Response** – A copy of emails, letters, or notes on meetings with LEPC and local responders including contact information (individual names, phone numbers, email addresses, organization name), dates, and coordination activities.
4. **Tier II Reporting** - Evidence of submission of a Tier II as described in 40 C.F.R. Part 370 to the State Emergency Response Commission ("SERC"), the Local Emergency Response Commission ("LEPC"), and the fire department with jurisdiction over the facility.

ANALYSIS OF DOCUMENTATION SUBMITTED:

1. **Process Hazard Analysis:** The most recent 2022 PHA was performed by Trinity Consultants on 8/25/2022 and prepared by Natalie VanLiew, PE and Lamb Weston Twin Falls (LWTF) team. The What-If / Checklist Analysis methodology was used. Trinity Consultants (Trinity) led a PHA revalidation for the anhydrous ammonia refrigeration system at the Lamb Weston Twin Falls, ID Facility on August 23, 24 and 25, 2022. The PHA team consisted of engineering, management, process safety, environmental, safety, and operations staff from the Facility. The 2022 PHA revalidation was completed (19 recommendations) based on process information and process equipment configurations understood to be current as of August 23, 2022. The PHA team produced 19 recommendations to reduce either the consequence severity or the likelihood of an ammonia release. Based on the Initial Overall Risk Ranking, there were three recommendations with a High-Risk Ranking, nine with a Medium-Risk Ranking, and seven with a Low-Risk Ranking identified by the PHA team. These recommendations were addressed according to Lamb Weston's PHA standards. The August 23, 2022, PHA Recommendations Summary Checklist did not include persons assigned to assure completion of the 19 actions item listed on the report.

   An updated Recommendations Table was provided to EPA on December 6, 2022. The updated document shows current progress on the 2022 PHA recommendations as well as the assigned individual responsible for addressing each issue.

   A 2017 PHA was performed by Lamb Weston from 8/22-24/2017 and prepared by Frank Fabian, PE. The 2017 PHA, which was completed in August 2017, was based on a generic study developed by the International Institute of Ammonia Refrigeration (IIAR) and the International Association of Refrigerated Warehouses (IARW). The study was customized and supplemented with unique site-specific issues to ensure that all hazards of the ammonia refrigeration system were thoroughly reviewed. All findings are closed. The What/IF Checklist methodology was used.

   In addition to the Recommendations Summary Checklist for the 2022 PHA Revalidation, the report also included a listing of all MOC's and Incidents (pages 209-2013) at LWTF from 2017 to 5/13/2022. The 3-page list identified root cause of issue, all action items, key recommendations and completions. Only two recommended action items on this list were deferred for future FY2023 capital projects.

   1. New cooler installed in 2021 due to flange leaks (thermosiphon oil cooler) however plan to repair engine walls deferred to next year future capital work (FY2023) to replace stem walls.
   2. Plugged tube on evaporators Future capital work (FY2023) to replace L3 freezer coils.

   LWTF commissioned Kemper Northwest to perform an Ultrasonic Thickness Testing Report, prepared by Scott Hudson on 08/27/2018 and Relief System Analysis July 24, 2019. The results of these two reports are included in the 2017 PHA Revalidation. Appendix H Addendum A (July 17, 2019, Update).

The purpose of the Addendum to the PHA was to provide an as-built set of relief information that may be used for proper documentation and support for the current design of the relief valves in the facility. The main body of the report remained unchanged. The data was based on the construction updates from the latest upgrades. Evidence of the work completed by Kemper was noted in the MOC section of the 2022 PHA Revalidation.

2. **Compliance Audit:** The compliance audit was performed on July 7-9, 2021, by Trinity Consultants representative Ms. Natalie Liew, PE and LWTF representatives. All 52 action items identified were completed. The 2021 compliance audit report dated August 23, 2021, was certified and signed on 9/30/2021 by PE Ms. Liew on 8/23/22 and LWTF Plant Manager, Mr. Andrew Gardner on 9/30/22.

   From March-July 2018, Lamb Weston TF performed a compliance audit with ERM, Inc. The 2018 compliance audit identified thirteen (13) findings, all of which were closed. It was certified by Walt Dauglash, Audit Team Leader of ERM, Inc. in July 2019 and Cindy Jones of Lamb Weston TF certified the compliance audit on 8/19/2020.

3. **Training:**
   a. Initial Training Records: A facility training summary last revised on 11/19/2020 by the PSM Coordinator, Cindy Jones, shows the date of initial training and last refresher training for all seventeen (17) operators.
   b. Refresher Training Records: Verification of training and understanding of that training was given for thirteen (13) operators. One operator, Randy Pawson, does not have an up-to-date verification for refresher training.
   c. Training Documentation: The training manual provided is Lamb Weston TF's training policy and procedures for employee training. The training documentation is in the form of initial/refresher training records, facility training summary, and the SOP training certification summary for each operator.
   d. SOP Annual Certification: An Annual 2022 SOP Review document was provided. In the list there are SOPs reviewed and certified by Cindy Jones between 1/10/2022 and 12/5/2022, but there was no signature on the annual SOP certification document. Lamb Weston has approximately twenty SOPs that are overdue for review and certification in October and November 2022 such as Cold Storage Compressor, Cold Storage Condenser ECCS, and Cold Storage Freezer Coil #1 (East).
   e. Facility Training Summary: The SOP Training Certification Summary shows the training provided and the date at which it was provided for seventeen (17) TF operators. The SOP Training Certification Summary shows that two current operators (Mashel Guptill and Nedzad Imamovic) are not up to date on all trainings.

4. **Emergency Response Coordination (Annually after 9/21/18):** Lamb Weston TF Emergency Action and Response Program was last revised 3/31/2021. There are regulated substances above threshold quantities at 115,000 lbs. In the event of a fire that cannot be controlled by a fire extinguisher or the fire suppression system, Twin Falls Fire Department (FD) will be contacted. Contacts provided in Local coordination 2018-2021. Local coordination 2018-2021 notes LWTF inviting the Twin Falls FD on 2/12/2018 for an annual refresher, 1/17/2019 for a Hazwoper refresher, and 6/11/2021 for a plant tour. Ammonia response drills were performed on 5/18 and 5/20/2020 with Twin Falls FD present.

5. **Tier II Reporting:** 2021 Tier II dated 2/28/2022 provided to ID SERC, LEPC and Fire Department.

AREAS OF CONCERNS:

1. The 2022 SOP Annual Certification document has not annually certified all of their operating procedures for the ammonia refrigeration system. [68.69(c)]. The 2022 SOPs reviewed and certified by Cindy Jones between 1/10/2022 and 12/5/2022 did not show a wet signature or digital signature certifying that the SOPs are current and accurate. Lamb Weston has approximately twenty SOPs that are overdue for review and certification in October and November 2022 such as Cold Storage Compressor, Cold Storage Condenser ECCS, and Cold Storage Freezer Coil #1 (East).

The findings in this report will be discussed with the facility via telephone and email after certification of this report.

DOCUMENTS REQUESTED ON FOLLOW-UP:
The following documents were requested after the initial submission of documents. These documents were reviewed to determine compliance with Section 112(r) of the Clean Air Act.

1. Clarification on documents provided for Training, PHA and Compliance Audit certification.
2. Compliance Audit signature clarification; SOP Annual certification (no signature); Tracking Report of the Recommendations Checklist.
3. 2022 PHA Tracking of Recommendations such as Item# 16.1.1.12, Item# 12.6.3 and Item#19.1.1.

AUDIT REPORT CERTIFICATION:
This is to certify that I, Terry Garcia, was the lead inspector with Mhara Coffman as Inspector in Training, reviewed the facility documents for compliance review and that we have verified the accuracy of the observations in this inspection report:

Terry Garcia Digitally signed by Terry Garcia
Date: 2022.12.20 13:46:36 -08'00'

Signature : Terry Garcia, Lead RMP Inspector Date

MAIGHDEAN-MHARA COFFMAN Digitally signed by MAIGHDEAN-MHARA COFFMAN
Date: 2022.12.21 12:08:53 -08'00'

Signature : Mhara Coffman, RMP Inspector in Training Date

JAVIER MORALES Digitally signed by JAVIER MORALES
Date: 2022.12.20 14:08:36 -08'00'

RMP Coordinator/Approval Date

ERIN WILLIAMS Digitally signed by ERIN WILLIAMS
Date: 2022.12.21 11:54:59 -08'00'

EPCRA Coordinator/Approval Date

Jennifer A Sullivan Digitally signed by Jennifer A Sullivan
Date: 2022.12.21 10:22:26 -08'00'

Land Enforcement Section Chief/Approval Date