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

FACILITY INFORMATION:
Name: Sysco Portland, Inc.
Physical Address: 26250 SW Parkway Center Drive, Wilsonville, OR 97070
Phone Number: 503-682-8700
Latitude/Longitude: 45.3300,-122.7616
EPA Facility ID# 1000 0012 2547

CONTACT INFORMATION (RMP Implementation):
Name: Joan Katatumba, Vice President of Operations
Phone Number: (503) 682-6682
E-mail: joan.katatumba@sysco.com

EMERGENCY CONTACT INFORMATION:
Name: Ric Lewis, Fleet and Facilities Director
Phone (24-hr): (971) 246-1455
E-mail: lewisjr.richard@pdx.sysco.com
Website: www.syscoportland.com

AUDIT DETAILS:
Contact Date: July 21, 2022
Inspectors: Terry Garcia, US EPA Region 10 SEE Grantee, Lead RMP Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:
Initial Submission Date: June 22, 1999
Date of Latest Update: September 6, 2018

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.)
1000090880	Ammonia Refrigeration System	1000113650	49312	3	Ammonia, Anhydrous (7664-41-7)	16,313

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 did not conduct an onsite inspection due to the COVID risk levels in the RMP facility area.

- 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 ☒

<u>CAA Title V Air Permit</u>:
Does the facility have a CAA Title V Permit? No ☒ Yes ☐

<u>RELEASE/ACCIDENT HISTORY</u>:
Did the facility have a reportable release in the past 5 years? No ☒ Yes ☐

<u>EPCRA TIER II REPORTING</u>:
Did the facility submit their 2021 Tier II report to the SERC? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: 2/11/2022

Did the facility submit a Tier II to the LEPC and local fire department? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: 2/11/2022

<u>GENERAL INFORMATION</u>:
The facility is regulated under the Risk Management Program as a Program Level 3 process and is owned and operated by Sysco Portland, Inc. Sysco is a global selling, marketing and distributing food products to restaurants, healthcare and educational facilities, lodging establishments and other customers who prepare meals away from home. Its family of products also includes equipment and supplies for the foodservice and hospitality industries. With more than 58,000 associates, the company operates 343 distribution facilities worldwide and serves more than 650,000 customer locations. The Wilsonville/Portland Sysco refrigeration facility uses anhydrous ammonia. The reported maximum inventory of anhydrous ammonia is 16,313 pounds. There are 275 full-time employees on site.

<u>INFORMATION REQUESTED FROM FACILITY</u>:

1. **Process Hazard Analysis** – A copy of the last two PHAs with recommendations and tracking sheets.
2. **Compliance Audit** – A copy of the last two Compliance Audits with recommendations and tracking sheets.
3. **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. Facility provided 2018-2021 Annual review documentation and certification noting attended by and approved.
    e. Fill in **Facility Training Summary** sheet.
4. **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. The documented meetings included the date/time, name of the First Responders Tualatin Valley Fire and Rescue, sign-in sheet with both employees and first responders present, topics discussed.

5. **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:** Sysco Portland, Inc. provided their 2012 and 2017 PHA revalidation that both used a What/IF Checklist Methodology for analysis. The 2012 PHA team consisted of Lead CHMM, Steve Williams; Sysco team members Ryan Gillett, Randy Edmiston, John Fraser, Mike Davenport, Ric Lewis and Dan Hackworth. The 2012 PHA findings and recommendations were closed as of August 21, 2012. The 2017 PHA Revalidation (137 page) Project No. 0795.01.05 conducted on October 9, 2017 and prepared by Maul Foster & Alongi, Inc. The 2017 PHA findings and recommendations were closed as of August 13, 2017.
2. **Compliance Audit:** Sysco Portland, Inc. provided their June 19-20, 2018 and May 18-19, 2021 Compliance Audit reports for review. The 2018 audit report (conducted by Harbor Environmental and Safety) was certified (post dated) by Mr. Bryce White, VP of Operations on 8/26/2021 to correct error of missing certification statement found on the 2021 audit. Documentation was not provided to show that the 2021 audit report was certified. The 2018 audit report with thirty-three (33) findings shows all findings were resolved and closed. The 2021 audit report with nine findings shows all findings were resolved and closed.
3. **Training:**
    a. Sysco Portland, Inc. provided initial and refresher training records for all their operators including SOP training.
    b. Training Documentation: The training documentation was provided for Frank Pond-Operator, Jason Perillo-Operator, Pete Konovalov-Manager, and Ric Lewis-Director. Hazwoper training certificates dated 5/26/2022 were provided for two Permacold employees but no site-specific documentation was provided for these contract employees.
    c. SOP Annual Certification: Sysco Portland, Inc. provided annual SOP certification for 2016 to 2021 for review. All annual SOP certifications were reviewed and certified by their operators and approved by the Facility Lead. The 2022 SOP certification dated August 11, 2022 was provided and was authorized and approved by Sysco facility representatives.
    d. Facility Training Summary: Sysco Portland, Inc. provided a completed EPA Training Summary for all operators including two Permacold contracted operators.
4. **Emergency Response Coordination (Annually after 9/21/18):** Sysco Portland, Inc. provided documentation of Sysco facility representatives and local responder coordination with evidence of visits to facility and meetings with Clackamas County LEPC and Fire from 2018 to 2021.
5. **Tier II Reporting:** Sysco Portland, Inc. provided documentation of Tier II reporting of the 2020 (2/2/ 2021) and 2021 (filed 2/11/2022 and an updated 2021 Tier II dated July 7, 2022). All reports signed by Ric Lewis Sysco Director of Fleet & Facilities.

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

1. Sysco Portland, Inc.'s did not provide site specific operator training for their two Permacold contractor operators, Victor Nash and Pete Schildmeyer.
2. Sysco Portland, Inc.'s did not provide documentation certifying the 2021 Compliance Audit report.

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

1. Training Summary for operators and maintenance including contractors was provided on August 25, 2022, by Sysco.
2. Training documentation for two Permacold operators, Victor Nash and Pete Schildmeyer. Hazwoper training certificates were provided for the two Permacold employees.

AUDIT 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 (Affiliate) Digitally signed by TERRY GARCIA (Affiliate) Date: 2022.10.17 14:44:07 -07'00'

Signature Date

JAVIER MORALES Digitally signed by JAVIER MORALES Date: 2022.10.17 15:23:32 -07'00'

RMP Coordinator/Approval Date

ERIN WILLIAMS Digitally signed by ERIN WILLIAMS Date: 2022.10.18 10:55:45 -07'00'

EPCRA Coordinator/Approval Date

Jennifer A Sullivan Digitally signed by Jennifer A Sullivan Date: 2022.10.18 09:19:23 -07'00'

Land Enforcement Section Chief/Approval Date