

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

FACILITY INFORMATION:

Name: Roy Farms, Inc.
Physical Address: 401 Walters Road, Moxee, Washington 98936
Phone Number: (509) 452-3494
Latitude/Longitude: 46.556722/-120.356056
EPA Facility ID# 100000200409

CONTACT INFORMATION (RMP Implementation):

Name: Alva Nunez
Phone Number: (509) 452-3494
E-mail: alva@royfarms.com

EMERGENCY CONTACT INFORMATION:

Name: Michael Roy
Phone (24-hr): Owner
E-mail: michael@royfarms.com
Website: www.royfarms.com

AUDIT DETAILS:

Contact Date: April 5, 2021
Inspector: Peter Phillips, US EPA Region 10 SEE Grantee, RMP Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: 10/22/2007
Date of Latest Update: 12/11/2017

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)
1000083659	Refrigeration	1000104330	49312	3	Ammonia, Anhydrous (7664-41-7)	19,400
1000083660	Refrigeration	1000104331	49312	3	Ammonia, Anhydrous (7664-41-7)	12,700

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 will not be conducting onsite inspections due to the COVID-19 pandemic requiring restricted travel and social distancing by the Centers for Disease Control (CDC) to prevent the spread of COVID-19. EPA Region 10 will coordinate with the RMP facility to schedule an onsite inspection when the CDC has determined it is safe.

- The facility has been previously inspected in the past 5 years: No ☒ Yes ☐
- Is the emergency contact information current? No ☐ Yes ☒

- The facility is High Risk: No ☒ Yes ☐
- Joint EPCRA audit: 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 HISTORY:

Did the facility submit their 2020 Tier II report to the SERC? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 2/22/2021

Did the facility submit a Tier II to the LEPC and local fire department? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 2/22/2021

GENERAL INFORMATION:

The facility is regulated under the Risk Management Program as a Program Level 3 process and is owned and operated by Roy Farms, Inc. (Roy Farms) located in Moxee, Washington. The 165,00 square foot facility stores hops, fruit, berries, and other produce in cold storage. Roy Farms operates year-round, but activity increases during the fall harvest season. Typical hours of operation are from 7:00 to 4:30, Monday through Friday, but may expand during harvest season. During peak season, the facility has 900 full-time non-union employees.

The facility uses 42,350 pounds of anhydrous ammonia as a refrigerant and lists two covered processes in their RMP. Refrigeration system consists of four machine rooms. Machine Room 1 and 2 (co-located) is considered first covered process and Machine Room 3 and 4 (co-located) is the second covered process. A total of eleven compressors are in both covered processes. The facility has two operators who perform routine operations and maintenance. No major changes to the process in recent years. The refrigeration system is monitored around the clock by maintenance staff onsite and remotely by computer. Machine room access is limited to the operators and management staff.

Roy Farms uses a contractor, Doubl-Kold, to perform major maintenance and repair of the refrigeration equipment including other work such as the process hazard analysis (PHA) and compliance audits.

INFORMATION REQUESTED FROM FACILITY:

1. Process Hazard Analysis – original and last revalidation
2. Compliance Audit – last 2 compliance audit reports
3. Training – operator/maintenance training

ANALYSIS OF DOCUMENTATION SUBMITTED:

1. **Process Hazard Analysis (PHA):** Roy Farms provided their 2012 and 2017 PHA revalidations. The 2012 PHA revalidation conducted on September 14, 2012 and all findings and recommendations were completed. The 2017 PHA revalidation was conducted on August 17, 2017 as reported in their RMP. The 2017 PHA shows that all findings and recommendations were completed by November 23, 2018. The 2017 PHA revalidation was completed 5 years after 2012 PHA.
2. **Compliance Audit:** Roy Farms provided their 2016 and 2019 Compliance Audit reports including finding tracking sheets. All 2019 Compliance Audit findings were addressed by June 2, 2020. Roy Farms is performing their compliance audits every three years.
3. **Training:** Roy Farms provided initial and refresher training documentation for their two operators, Jose Pena and Victor Delgadillo. Roy Farms has their operators trained at Garden City Ammonia Program for initial (2017) and refresher (2020) training as an Industrial Refrigeration Operator I. Roy Farms provides an annual standard operating procedures (SOP) review training for their operators. Roy Farms provided a signed 2019, 2020 and 2021 SOP Review Summary and Certification. In addition, Roy Farms provided some safe work practice training records such as confined space, ladder safety, LOTO and fire extinguishers.

AREAS OF CONCERNS:

1. **Training:** Roy Farms did not submit training documentation for their two operators for initial SOP overview training in 2017.

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:

No follow-up documentation was requested.

AUDIT REPORT CERTIFICATION:

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

Signature

Date

RMP Coordinator/Approval

Date

EPCRA Coordinator/Approval

Date

Land Enforcement Section Chief/Approval

Date