



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: Lineage Logistics Portland 1
Physical Address: 17400 NE Sacramento Street
Phone Number: 532-256-2525
Latitude/Longitude: (45.540200, -122.482900)
RMP Facility ID#: 1000 0019 2506
EJ Concerns: Yes (Above 80%)

CONTACT INFORMATION (RMP Implementation):

Name: Andrey Berezhnoy
Phone Number: 503-256-2525
E-mail: aberezhnoy@lineagelogistics.com

EMERGENCY CONTACT INFORMATION:

Name: Andrey Berezhnoy
Phone (24-hr): 503-313-0540
E-mail: aberezhnoy@lineagelogistics.com
Website: www.lineagelogistics.com

TRIP DETAILS:

Inspection Date: March 14, 2023
Inspection Time: 0845 hours through 1145 hours
EPA Inspection Team:
Peter Phillips, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Edward Johannes, US EPA Region 10 SEE Grantee, EPCRA Inspector
Terry Garcia, US EPA Region 10 SEE Grantee, RMP Inspector
Mhara Coffman, US EPA Region 10, RMP Inspector
Taylor Law, Weston Solutions, Inc., EPA START Contractor

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: July 12, 2005
Date of Latest Update: December 7, 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)
1000128517	Refrigeration	1000161139	49312	3	Ammonia, Anhydrous (7664-41-7)	16,870

PURPOSE:

The purpose of this inspection was to determine if 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.

- The facility has been previously inspected in the past 5 years: No ☐ Yes ☒
If Yes, Date of Last Inspection: 11-22-2019
- 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 ☐

RELEASE/ACCIDENT HISTORY:

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

EPCRA TIER II REPORTING:

Did the facility submit the [Enter Year] Tier II report to the SERC? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 1-10-2023

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: 1-10-2023

INSPECTION ENTRY:

Peter Phillips led the inspection entry. The EPA Inspection Team (EPA) met with facility representative General Manager Allan Delacruz at the Lineage Logistics facility in Portland, Oregon. EPA arrived at the facility at 0845 hours and was joined by the following facility personnel:

Name	Title
Allan Delacruz	General Manager
Andrey Berezhnoy	Facility Maintenance Manager
Daniel Mendoza	Facility Maintenance Manager
Bo Hurley	Regional Safety Manager
Boris Vallejo	Maintenance Technician
Aaron Hawkins	Regional Maintenance Manager

Was a state/county/or local emergency representative present? No ☐ Yes ☒

If Yes, Name and Title of Representative: Bryan Profit

The facility is a first responder: No ☒ Yes ☐

If No, Responding Agency: Portland Fire Department

Facility representatives escorted EPA to a conference room located in the facility's main office building. Lead Inspector Peter Phillips introduced all parties present, provided a summary of the Risk Management Program (RMP), and explained the purpose of the visit. Each EPA Inspector presented his/her credentials.

EPA requested an explanation of the facility's operations and any additional safety measures to be taken during the site tour. Andrey Berezhnoy 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 ☐

An employee representative present during the facility visit: No ☐ Yes ☒

If Yes, Name/Title: Andrey Berezhnoy - Facility Maintenance Manager

GENERAL INFORMATION:

The facility is regulated under RMP rule a Program Level 3 facility and is owned and operated by Lineage Logistics Holdings, LLC. The facility provides large-scale public storage for food products and utilizes one anhydrous ammonia to refrigeration system to support product warehousing, receiving, and shipment. The refrigeration system utilizes approximately 16,870 pounds of anhydrous ammonia, and cools six warehousing rooms. The facility employs 27 full-time employees on site, three of whom are designated refrigeration system operators.

ON-SITE OBSERVATIONS:

EPA toured the facility from approximately 1000 hours to 1030 hours. A single engine room houses the refrigeration system components supported by a roof-mounted condenser (photo 37). The refrigeration system services six cold storage rooms. Each cold storage room contains a minimum of two evaporators per room for cooling, and two ammonia detectors. Ammonia detectors engage alarms when they detect ammonia at 25 parts per million (ppm) and the system initiates shutdown when it detects 100 ppm ammonia.

The facility includes six cold storage rooms, designated as cold storage rooms 1-6 (photo 1). EPA observed select areas of the facility including the interior loading area (photo 2), the forklift staging area (photos 3-4), cold storage room 2 (photos 5-10), the engine room (photos 11-34), and the exterior areas of the facility including roof-mounted components and the exterior loading dock (photos 35-38).

EPA observed food products warehoused in cold storage room 2 (photos 5-6) and cooled by evaporators (photos 6-7). Two ammonia detectors provide safety alarms to the area (photos 8-10).

EPA toured the engine room (photos 11-12) and observed refrigeration system components including compressors and piping (13-20), intake and exhaust vents (photos 21-23), and pump units (photos 24-26). EPA observed inspection tags on components as current (photo 27). Safety measures observed in the engine room include an emergency shower and eye wash station (photo 28), posted HAZCOM signage (photos 29-30), ammonia detectors and alarm system (photos 31-32), posted safety contacts and permits (photo 33), lockout tagout and emergency stop controls (photo 34-35), and absorbent padding beneath compressors to support housekeeping (photo 36).

EPA observed the roof-mounted condenser component of the refrigeration system and a windsock at the exterior of the building (photo 37 and 38), as well as the exterior loading dock (photo 38).

Photographs taken during the inspection are included in Attachment A to this report.

After touring the RMP-covered process areas at the facility, EPA returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to Allan Delacruz, Andrey Berezhnoy, Daniel Mendoza, Bo Hurley, Boris Vallejo, and Aaron.

INFORMATION COLLECTED FROM FACILITY:

1. Facility Tier II hard copy
2. Miscellaneous Safety Systems document
3. Refrigeration System block flow diagram
4. EPA sign in sheet
5. Copy of 2021 Compliance Audit

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

No areas of concern were identified at the time of the inspection.

DOCUMENTS REQUESTED NOT INCLUDED IN REPORT:

The following documents were requested during the inspection but are not included in this report. These documents will still be reviewed to determine compliance with Section 112(r) of the Clean Air Act.

No follow-up documentation was requested.

INSPECTION 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:

PETER PHILLIPS
(Affiliate)

Digitally signed by PETER PHILLIPS
(Affiliate)
Date: 2023.07.17 11:27:07 -07'00'

Inspector Signature

JAVIER MORALES

Digitally signed by JAVIER
MORALES
Date: 2023.07.25 15:00:22 -07'00'

RMP Coordinator/Approval

ERIN WILLIAMS

Digitally signed by ERIN
WILLIAMS
Date: 2023.08.01 09:18:15 -07'00'

EPCRA Coordinator/Approval

MATTHEW
QUARTERMAN

Digitally signed by MATTHEW
QUARTERMAN
Date: 2023.08.01 09:54:42 -07'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: Lineage Logistics Portland 1
City, State: Portland, Oregon
Photographer: Taylor Law

File	Photo Layout ID	Date	Time	Description
Photo 1.jpg	1	3/14/2023	09:45am	Facility Layout Map
Photo 2.jpg	2	3/14/2023	09:46am	Interior Loading Area, overview
Photo 3.jpg	3	3/14/2023	09:46am	Forklift Staging Area, overview
Photo 4.jpg	4	3/14/2023	09:46am	Forklift Staging Area, overview
Photo 5.jpg	5	3/14/2023	09:46am	Cold Storage Room 2, overview
Photo 6.jpg	6	3/14/2023	09:47am	Cold Storage Room 2, overview
Photo 7.jpg	7	3/14/2023	09:50am	Cold Storage Room 2, evaporators
Photo 8.jpg	8	3/14/2023	09:50am	Cold Storage Room 2, ammonia detector
Photo 9.jpg	9	3/14/2023	09:50am	Cold Storage Room 2, ammonia detector
Photo 10.jpg	10	3/14/2023	09:50am	Cold Storage Room 2, ammonia detector
Photo 11.jpg	11	3/14/2023	09:50am	Engine Room, overview
Photo 12.jpg	12	3/14/2023	09:50am	Engine Room, overview
Photo 13.jpg	13	3/14/2023	09:51am	Engine Room, compressors and piping
Photo 14.jpg	14	3/14/2023	09:51am	Engine Room, compressors and piping
Photo 15.jpg	15	3/14/2023	09:51am	Engine Room, compressors and piping
Photo 16.jpg	16	3/14/2023	09:52am	Engine Room, screw compressor and piping
Photo 17.jpg	17	3/14/2023	09:52am	Engine Room, compressors and piping
Photo 18.jpg	18	3/14/2023	09:52am	Engine Room, compressors and piping
Photo 19.jpg	19	3/14/2023	09:53am	Engine Room, compressors and piping
Photo 20.jpg	20	3/14/2023	09:53am	Engine Room, compressors and piping
Photo 21.jpg	21	3/14/2023	09:55am	Engine Room, air intake
Photo 22.jpg	22	3/14/2023	09:55am	Engine Room, air exhaust vent
Photo 23.jpg	23	3/14/2023	09:55am	Engine Room, air exhaust vent
Photo 24.jpg	24	3/14/2023	09:56am	Engine Room, pump units
Photo 25.jpg	25	3/14/2023	09:58am	Engine Room, pump units
Photo 26.jpg	26	3/14/2023	09:58am	Engine Room, pump units
Photo 27.jpg	27	3/14/2023	09:58am	Engine Room, maintenance tag example
Photo 28.jpg	28	3/14/2023	09:59am	Engine Room, emergency shower and eye wash station
Photo 29.jpg	29	3/14/2023	10:00am	Engine Room, hearing protection and posted hazcom signage
Photo 30.jpg	30	3/14/2023	10:00am	Engine Room, posted hazcom signage
Photo 31.jpg	31	3/14/2023	10:00am	Engine Room, ammonia detection system
Photo 32.jpg	32	3/14/2023	10:00am	Engine Room, detection ammonia alarm
Photo 33.jpg	33	3/14/2023	10:00am	Engine Room, posted emergency contacts and permits
Photo 34.jpg	34	3/14/2023	10:01am	Engine Room, exit and lockout tagout station
Photo 35.jpg	35	3/14/2023	10:02am	Engine Room, absorbent pad beneath compressor to aid housekeeping
Photo 36.jpg	36	3/14/2023	10:03am	Facility Exterior, emergency stop for Engine Room system
Photo 37.jpg	37	3/14/2023	10:04am	Facility Exterior, roof mounted windsock and condenser
Photo 38.jpg	38	3/14/2023	10:04am	Facility Exterior, Exterior Loading Dock