

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

FACILITY INFORMATION:

Name: OFD Foods, LLC, Plant 1
Physical Address: 770 29th Avenue SW, Albany, Oregon 97321
Phone Number: (541) 926-6001
Latitude/Longitude: 44.614167/-123.111389
EPA Facility ID# 100000063691

CONTACT INFORMATION (RMP Implementation):

Name: Greg Skaer
Phone Number: (541) 926-6001
E-mail: gregory.skaer@ofd.com

EMERGENCY CONTACT INFORMATION:

Name: Gray Johnson
Phone (24-hr): Engineering & Maintenance Director
E-mail: gray.johnson@ofd.com
Website: www.ofd.com

AUDIT DETAILS:

Contact Date: 4/5/2021
Inspector: Peter Phillips, US EPA Region 10 SEE Grantee, RMP Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: 7/19/1999
Date of Latest Update: 6/10/2019

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.)
1000096234	Dried and Dehydrated Food, Refrigeration	1000120473	311423	3	Ammonia, Anhydrous (7664-41-7)	50,409

PURPOSE:

The purpose of this document review was to determine whether this facility is compliant 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 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 HISTORY:

Did the facility submit their 2021 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 OFD Foods, LLC. OFD Foods, LLC (formerly Oregon Freeze Dry) was formed in 1963, when the company began drying fruit for breakfast cereals and worked with the Department of Defense to develop and produce military rations.

OFD Foods, LLC (OFD Foods) located Albany, Oregon, employs 347 full-time non-union employees in four daily shifts operating 24 hours, 7 days per week. There are three manufacturing facilities on a 35-acre industrial site. OFD Foods operates under USDA (meat and poultry), FDA (food, drug and medical device), USDA Organic, Kosher, Halal, and other certifications. The company has over 20 million kilograms of drying capacity at its three Oregon plants.

OFD Foods has reported an ammonia inventory of 50,409 pounds of anhydrous ammonia in their RMP exceeding the threshold quantity of 10,000 pounds. The refrigeration system has two machine rooms that can be remotely monitored and shut down. The north machine room contains five compressors, and the south machine room has ten compressors. There are four process operators with one operator in training as an apprentice and another operator as a shift mechanic who have exclusive access to the machine rooms. These same employees operate and maintain the Plant 2 & 3 ammonia refrigeration system.

The facility has a response team trained to OSHA Level B that aid the Albany Fire Department in the event of an ammonia release. There have been no reportable releases in the past five years.

INFORMATION REQUESTED FROM FACILITY:

1. **Process Hazard Analysis** – last two updates/revalidations.
2. **Compliance Audit** – last two compliance audit reports.
3. **Training** – operator/maintenance initial and refresher training records.

ANALYSIS OF DOUCMENTATION SUBMITTED:

1. **Process Hazard Analysis (PHA):** OFD Foods provided their 2012, 2016, and 2017 PHAs for review. The PHAs were conducted on the following dates: (1) 2012 on 11/28/12 to 1/24/13; (2) 2016 on 1/19/16 to 1/20/16 (process change); (3) 2017 on October 10-19, 2017 (process change) and December 5 – January 29, 2017. The 2017 PHA update was completed five years after the

2012 PHA. The 2017 PHA findings and recommendations were all completed between March 4, 2018 and July 18, 2019. The following changes to the ammonia refrigeration process required a PHA to be conducted to identify and address the hazards: (1) the 2016 PHA addresses the installation of an electronic process control system which was completed by 9/29/2016; and (2) the October 2017 PHA addresses the installation of a desuperheater which was completed on 5/30/2018. The PHA findings and recommendations were completed on the following dates: (1) the 2012 PHA completed by 1/22/13; and (2) the October 2017 PHA completed 1/16/19.

2. **Compliance Audit:** OFD Foods provided their 2016 and 2019 Compliance Audits including the tracking sheets. Their compliance audits are being performed at least every three years. All 2019 Compliance Audit findings were completed by July 18, 2019. There were no audit findings carried over from the 2016 Compliance Audit.
3. **Training:** OFD Foods provided a completed Training Summary Form for their four Journeyman Refrigeration Mechanics/Operators including an Apprentice Refrigeration Mechanic and one supervisor. They provided the following training documentation provided for their operators: RETA Ammonia Refrigeration Operator certifications, HAZMAT 16 Hour training, HAZMAT 24 Hour training, and ASTI 8 Hour HAZMAT. In the Training Summary Form for each operator, OFD Foods provided initial and refresher training dates stating the means of verification is hands on demonstration, but provided no documentation for the site specific training on operating procedures. For example, the Training Summary Form for Brad Marshall does not show training on site specific operating procedures. OFD Foods provided no training documentation on safe work practices for their operators such as lockout/tagout. OFD Foods did not provide refresher training documentation for their operators for 2021 and prior three years.

AREAS OF CONCERNS:

1. **Training:** 40 CFR 68.71(1)(a). Each employee presently involved in operating a process, and each employee before being involved in operating a newly assigned process, shall be trained in an overview of the process and in the operating procedures as specified in § 68.69. The training shall include emphasis on the specific safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks. OFD Foods was unable to provide initial training documentation for their operators for the site-specific training on operating procedures including safe work practices.
2. **Training:** 40 CFR 68.71(b). Refresher training shall be provided at least every three years, and more often if necessary, to each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process. The owner or operator, in consultation with the employees involved in operating the process, shall determine the appropriate frequency of refresher training. OFD Foods did not provide refresher training documentation for their operators for 2021 and prior three years on the operating procedures.
3. **Training:** 40 CFR 68.71(c). The owner or operator shall ascertain that each employee involved in operating a process has received and understood the training required by this paragraph. The owner or operator shall prepare a record which contains the identity of the employee, the date of training, and the means used to verify that the employee understood the training. OFD Foods did not provide initial and refresher training documentation for their operators on site specific operating procedures and means to verify hands on training for each operator. In addition, OFD Foods did not provide safe work practice documentation for each operator.

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. Training documentation on safe work practices and the operators testing/reviewing/demonstration or observation on the current operating procedures. On 7/1/21 the facility provided an updated training summary listing dates for SOP review and means of evaluation, however, no documentation that operators acknowledged by signature that this training was conducted.

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
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RMP Coordinator/Approval	Date
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EPCRA Coordinator/Approval	Date
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Land Enforcement Section Chief/Approval	Date
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