



REGION 10

SEATTLE, WA 98101

Clean Air Act - Risk Management Program – Section 112(r)
Emergency Planning Community Right-to-Know Act – Sections 302, 311 and 312
On-site Compliance Inspection Report
DOT Foods, Inc.

PURPOSE

The purpose of this On-site Compliance Inspection was to determine compliance with the Clean Air Act Section 112(r) Risk Management Program (40 C.F.R. Part 68) and the Emergency Planning and Community Right to Know Act Sections 302, 311 and 312.

CAA Section 112(r)(7) requires facilities that hold more than a threshold quantity of a regulated substance in a process to develop and implement a Risk Management Program. EPCRA Section 311 requires facilities that hold chemicals above reporting threshold to submit copies of the SDSs or a list of these chemicals to the State Emergency Response Commission, the Local Emergency Planning Committee and the local fire department. EPCRA Section 312 requires the Annual Chemical Inventory Reports (Tier II) for the current calendar year to be submitted by March 1 of the following year. The Tier II is required to be submitted to the SERC, LEPC and fire department. EPCRA Section 302 requires any facility that has any EHS above the threshold planning quantities to notify the SERC and LEPC. LEPCs should also include the EHS(s) in their emergency response plans. Facilities covered under EPCRA Section 312 are required to indicate on the Tier II if they are subject to EPCRA Section 302 emergency planning requirements.

COMPANY INFORMATION

Name: DOT Foods, Inc.
Mailing Address: 1541 West 27th Street
Burley, Idaho 83318
Website: www.dotfoods.com

FACILITY INFORMATION

Name: DOT Foods, Inc.
Facility Address: 1541 West 27th Street
Burley, Idaho 83318
Latitude/Longitude: 42.517844 / -113.811953
RMP Facility ID#: 100000208125
FRS ID#: 110041623703
EJ Concerns: No

CONTACT INFORMATION (RMP Implementation)

Name: Anthony Soto
Title: General Manager
Phone Number: (877) 812-7192
E-mail: asoto@dotfoods.com

EMERGENCY CONTACT INFORMATION

Name: Mark Gratzner
Title: Maintenance Manager
Phone Number: (877) 812-7192
E-mail: mgratzner@dotfoods.com

INSPECTION DETAILS

Inspection Date: Thursday, September 19, 2024
Inspection Time: Start to Finish
Inspectors: Peter Phillips, US EPA R10, SEE Grantee, Lead RMP/EPCRA Inspector
Mhara Coffman, US EPA R10, RMP/EPCRA Inspector
Edward Johannes, US EPA R10, SEE Grantee, RMP/EPCRA Inspector
Ryan Bowsby, US EPA R10, RMP/EPCRA Inspector-in-Training

On 9/4/2024, EPA emailed a Notice of Inspection Letter to the facility informing them of a planned RMP and EPCRA inspection. The letter included 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. A copy of the letter must be provided to the employee representatives and the letter posted in a manner accessible to employees in the facility.

- Is the facility is unionized? Yes ☐ No ☒
If yes, name of union:
- Was an employee representative present during the inspection? Yes ☐ No ☒
If yes, name/title:

GENERAL INFORMATION

The facility is regulated under the Risk Management Program as a Program Level 3 facility and is owned and operated by DOT Foods, Inc. There are 347 full-time employees on site.

DOT Foods, Inc. is a food redistributor that provides distribution services to other distributors, including those serving military installations. The facility was constructed in 2008. The facility's operations encompass the management of a diverse range of food products through refrigerated, frozen, and dry storage facilities. Key operational areas include a dry goods warehouse, a cooler area, a freezer area, and the engine room.

DATE AND PROGRAM LEVELS OF SUBMITTED RMP

Initial Submission Date: 6/9/2009
Date of Latest Update: 11/23/2022

- Has the facility has been inspected in the past 5 years? Yes ☐ No ☒
If yes, date of last inspection:

- Is the facility High Risk? Yes ☐ No ☒

Process (as reported in the RMP)

Process ID	Description	Process Chemical ID	NAICS Code	Program Level	Chemical Name CAS Number	Quantity (lbs.)
1000128342	Refrigerated Warehousing and Storage	1000160917	49312	3	Ammonia, Anhydrous (7664-41-7)	12,870

CAA TITLE V AIR PERMIT

- Does the facility have a CAA Title V Permit? Yes ☐ No ☒

EMERGENCY RELEASE / ACCIDENT HISTORY

- Did an RMP reportable release occur in the past 5 years? Yes ☐ No ☒
 - Did a CERCA/EPCRA reportable release occur in the past 5 years? Yes ☐ No ☒
- If either yes, date and description of release:*

EPCRA 312 – TIER II REPORT

- Was the 2024 Tier II report submitted to the SERC? Yes ☒ No ☐
If yes, date Tier II was submitted: 02/07/2024
- Was the 2024 Tier II submitted to the LEPC/fire department? Yes ☒ No ☐
If yes, date Tier II was submitted: 02/07/2024
- Is the facility subject to EPCRA Section 302? Yes ☒ No ☐
If yes, is it correctly checked on the Tier II? Yes ☒ No ☐
- Is the subject to RMP correctly checked on the Tier II? Yes ☒ No ☐
- Is RMP facility ID correct on the Tier II? Yes ☒ No ☐

EPCRA CHEMICALS OVER THRESHOLD

According to the most recent Tier II, the facility stores the following hazardous chemicals over the reporting threshold.

Chemical Name	EHS (Yes or No)	CAS Number
Ammonia, Anhydrous	Yes	7664-41-7
Diesel Fuel	No	68334-30-5
Lead	No	7439-92-1
Sulfuric Acid	Yes	7664-93-9

EPCRA 302 – LEPC Coordination

The facility does not regularly participate in LEPC meetings.

LEPC

Agency: Cassia County LEPC
 Program Contact: Jennifer Gee
 Address: 1459 Overland Avenue
 Address 2: Burley, Idaho 83318
 Phone Number: (208) 878-8610

Email: jgee@cassiacounty.org
Website: <https://ioem.idaho.gov/county-and-tribal-emergency-managers-contact>

INSPECTION ENTRY

Peter Phillips led the inspection entry. The inspection team met with Mark Gratzner at the DOT Foods, Inc. facility in Burley, Idaho. The team arrived at the facility at Start and was joined by the following facility personnel:

Name	Title
Courtney Worthington	Refrigeration Operator
Dan Callet	General Manager
Dustin Critchfield	PSM Coordinator
Jeffrey Dean	Quality Manager

- Were any SERC, LEPC or fire department representative present? Yes ☐ No ☒
- Is the facility a first responder? Yes ☐ No ☒

If no, responding agency: Burley Fire Department, Cassia County Fire Department

The inspection team was escorted to a conference room. Introductions were made by Peter Phillips, who provided a summary of the risk management program and explained the purpose of the visit. Each team member presented their credentials.

EPA requested an explanation of the facility's operations and any additional safety measures that should be taken during the site tour. The facility requested that EPA personnel wear eye and hearing protection, high-visibility vests, and closed-toe shoes.

The facility operates 24 hours a day, 7 days a week. The facility has three operators and six maintenance personnel dedicated to managing and maintaining refrigeration systems and other critical processes. Operations are structured into two 10-hour shifts to ensure continuous functionality and efficiency.

FACILITY TOUR / ON-SITE OBSERVATIONS

The facility tour was conducted from approximately 9:25 A.M. to 10:15 A.M. The inspection team was escorted by Mr. Gratzner, Mr. Critchfield, Mr. Dean, and Ms. Worthington. Areas observed were the dry food area, cooler area, freezer area, and engine room.

Dry Food Area:

The facility currently operates approximately 30 battery-powered forklifts and has established a dedicated charging area for their maintenance within the dry food area (Photo 1). The facility has implemented an emergency shutdown mechanism for the battery chargers (Photo 2). Additionally, emergency shower and eyewash stations are readily available to ensure employee safety (Photo 2). The dry room does not have any anhydrous ammonia detectors, piping, or vessels.

Cooler Area:

The cooler area contains three ammonia evaporators (Photo 4). Three ammonia detectors and green ammonia alarm strobes are present (Photos 5, 6 and 7). Ammonia pipe labeling signage indicating was displayed (Photo 3). Piping to the evaporators were labeled (Photo 4).

Freezer Area:

The freezer area contains three evaporators (Photo 8). Light icing was visible on some of the units. Two ammonia detectors are located in the area (Photo 9).

Engine Room:

The engine room contains three screw compressors (Photo 21), a low-temperature recirculator vessel (Photo 23), a high-temperature recirculator vessel (Photo 22), and a High Pressure Receiver (HPR) with a king valve (Photos 23 and 26). The valves for the low-temperature recirculator vessel have visible ice buildup and no labeling (Photo 23). The engine room interior entrance door has ammonia hazard placards and an authorized personnel only notice posted next to the door (Photo 16). An emergency shower is located by the entrance door (Photo 16). The refrigeration control panel, computer station, lockout/tagout station, P&IDs and process flow diagrams are located in the control room (Photos 17 to 20). Ammonia audio/visual alarm, emergency ventilation controls, and emergency shutdown button are located outside the engine room (Photo 17). The engine room ventilation system has three air intakes and ceiling exhaust fans (Photos 24 and 28). An emergency shower/eyewash station is located in the engine room (Photo 21). Ammonia piping in the engine room is labeled with flow directions and identifies ammonia (Photos 21, 22, 24, 29, and 31). Pressure relief valves (PRVs) for compressors were tagged with an install date of May 2023 (Photo 25). Push bars were observed on the engine room exit doors. Audio/visual alarms were observed in the engine room (Photo 30). The HPR has a manual king valve (Photo 26) and a gas king solenoid valve is located in the engine room (Photo 31). The condenser is located on the roof (Photo 14) and a windsock was observed (Photo 15). Three ammonia detectors are located in the engine room that activate the alarm at 25 ppm, initiates emergency ventilation at 150 ppm, and triggers a system shutdown, excluding ventilation, at 300 ppm (Photos 27 and 32).

EPCRA Areas:

Diesel is stored in a 500-gallon above-ground tank (Photo 10) and a 30,000-gallon underground tank (Photo 11). An emergency response trailer equipped with Level A suits and SCBAs is located in the parking lot (Photo 12). The facility participates in emergency preparedness drills, including a May 8, 2024, exercise with the Burbank Fire Department and a June 10, 2024, evacuation drill, demonstrating a proactive approach to safety and readiness.

Photographs were taken of the covered process and other storage areas. The photographs are included in Attachment A.

After touring the RMP-covered process areas and the EPCRA chemical storage areas, the inspection team returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to facility staff listed above.

INFORMATION COLLECTED FROM FACILITY

1. Site map
2. Emergency Action Plan
3. Process flow diagram

AREAS OF CONCERNS

No areas of concern were identified during the inspection.

FOLLOW-UP DOCUMENTS REQUESTED

The following documents were unable to be located during the inspection by the facility representatives. The documents were requested to be sent to EPA by 10/3/2024. These documents were reviewed after the inspection to determine compliance with Section 112(r) of the Clean Air Act.

1. 2022 PHA recommendations
2. 2020 Compliance Audit findings
3. 2023 Compliance Audit findings

ON-SITE INSPECTION REPORT CERTIFICATION

This is to certify that I, Peter Phillips, as the lead inspector for the On-site Compliance Inspection and that I have verified the accuracy of the information in this report.

PETER PHILLIPS (Affiliate)

Digitally signed by PETER PHILLIPS
(Affiliate)
Date: 2025.02.13 15:33:55 -08'00'

Inspector Signature

JAVIER MORALES

Digitally signed by JAVIER MORALES
Date: 2025.02.14 08:14:50 -08'00'

RMP Coordinator Signature

ERIN WILLIAMS

Digitally signed by ERIN WILLIAMS
Date: 2025.02.14 08:35:20 -08'00'

EPCRA Coordinator Signature

**MATTHEW
QUARTERMAN**

Digitally signed by MATTHEW
QUARTERMAN
Date: 2025.02.14 10:48:11 -08'00'

Land Enforcement Section Manager Signature

ATTACHMENTS

- A. Photo Log and Photographs

Attachment A – Photo Log

Site Name: DOT Foods, Inc.

City, State: Burley, ID

Photographer: Ryan Bowlsby

File	Photo ID	Date	Time	Description
Photo1.jpeg	1	9/19/2024	9:30 AM	Forklift charging and emergency shower
Photo2.jpeg	2	9/19/2024	9:31 AM	Emergency shower and charger emergency stop
Photo3.jpeg	3	9/19/2024	9:32 AM	Ammonia Pipe labeling diagram
Photo4.jpeg	4	9/19/2024	9:33 AM	Evaporators in Cooler Area
Photo5.jpeg	5	9/19/2024	9:34 AM	Ammonia detector in Cooler Area
Photo6.jpeg	6	9/19/2024	9:35 AM	Red and green strobe light visual alarms
Photo7.jpeg	7	9/19/2024	9:36 AM	Ammonia detector in Cooler Area
Photo8.jpeg	8	9/19/2024	9:37 AM	Freezer room evaporator
Photo9.jpeg	9	9/19/2024	9:38 AM	Ammonia detector in freezer room
Photo10.jpeg	10	9/19/2024	9:39 AM	Diesel fuel storage
Photo11.jpeg	11	9/19/2024	9:40 AM	Diesel fueling area for trucks
Photo12.jpeg	12	9/19/2024	9:41 AM	Emergency response trailer
Photo13.jpeg	13	9/19/2024	9:42 AM	Outside View of Warehouse Dock Area
Photo14.jpeg	14	9/19/2024	9:43 AM	Roof condensers
Photo15.jpeg	15	9/19/2024	9:44 AM	Windsock
Photo16.jpeg	16	9/19/2024	9:45 AM	Engine room entrance door with hazcom signage and emergency shower
Photo17.jpeg	17	9/19/2024	9:46 AM	Ammonia audio/visual alarm, emergency ventilation controls, and emergency shutdown button
Photo18.jpeg	18	9/19/2024	9:47 AM	Refrigeration control panel
Photo19.jpeg	19	9/19/2024	9:48 AM	Lockout/tagout station
Photo20.jpeg	20	9/19/2024	9:49 AM	Process flow diagram in Control Room
Photo21.jpeg	21	9/19/2024	9:50 AM	Compressors and emergency shower/eyewash station in engine room
Photo22.jpeg	22	9/19/2024	9:51 AM	High Temperature Recirculator vessel and piping in engine room
Photo23.jpeg	23	9/19/2024	9:52 AM	V-1 High Pressure Receiver (HPR) and V-3 Low Temperature Recirculator vessel
Photo24.jpeg	24	9/19/2024	9:53 AM	Air intakes for engine room ventilation system
Photo25.jpeg	25	9/19/2024	9:54 AM	Pressure relief valves (PRVs) with install/replacement tags for Compressor RC-2
Photo26.jpeg	26	9/19/2024	9:55 AM	Manual liquid ammonia king valve for HPR
Photo27.jpeg	27	9/19/2024	9:56 AM	Ammonia detector in engine room
Photo28.jpeg	28	9/19/2024	9:57 AM	Ceiling exhaust fan and LEL detector in engine room
Photo29.jpeg	29	9/19/2024	9:58 AM	Ammonia piping with labeling
Photo30.jpeg	30	9/19/2024	9:59 AM	Audio/visual alarms
Photo31.jpeg	31	9/19/2024	10:00 AM	Ammonia gas king solenoid valve
Photo32.jpeg	32	9/19/2024	10:01 AM	Ammonia detector