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

FACILITY INFORMATION:
Name: Sorrento Lactalis, Inc.
Physical Address: 4912 E. Franklin Road, Nampa, Idaho 83653
Phone Number: (208) 467-4424
Latitude/Longitude: 43.605833, -116.492222
EPA Facility ID# 1000 0017 2706

CONTACT INFORMATION (RMP Implementation):
Name: Kelly Johnston
Phone Number: (208) 467-4424
E-mail: Kelly.Johnston@lactalis.us

EMERGENCY CONTACT INFORMATION:
Name: Wendy York
Phone (24-hr): (208) 860-9473
E-mail: wendy.york@lactalis.us
Website: sorrentolactalis.com

AUDIT DETAILS:
Contact Date: August 12, 2021
Inspectors: Bob Hales, US EPA Region 10 SEE Grantee, RMP Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:
Initial Submission Date: March 13, 2017
Date of Latest Update: October 30, 2020

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)
1000078527	Ammonia Refrigeration	1000097614	311513	3	Ammonia, Anhydrous (7664-41-7)	54,000

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 ☐
  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 ☐
If Yes, Permit Number:

<u>RELEASE/ACCIDENT HISTORY</u>:
Did the facility have a reportable release in the past 5 years? No ☒ Yes ☐
If Yes, Date and Description of the Release:

<u>EPCRA TIER II REPORTING</u>:
Did the facility submit their 2020 Tier II report to the SERC? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: 2/28/2021
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: 2/28/2021

<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 Sorrento Lactalis, Inc. In 1999, Sorrento Lactalis, Inc. purchased the plant in Nampa, Idaho to consolidate their U.S. production of Italian cheeses. This facility is one of the largest company plants worldwide manufacturing Italian style cheeses for distribution and sales in the domestic and international markets. In addition the facility manufactures whey. The facility used ammonia refrigeration to store and warehouse their dairy products. There are 695 full-time employees on site.

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

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.

<u>ANALYSIS OF DOUCMENTATION SUBMITTED</u>:
On October 12, 2021, Sorrento Lactalis Site Director, Kelly Johnston, provided documentation in response to response to document request email dated August 12, 2021.

Process Hazard Analysis (PHA):
Sorrento Lactalis submitted their 2011 and 2016 PHA revalidations. The 2011 PHA was conducted using a What-If/Checklist methodology. The PHA team consisted of Sorrento Lactalis employees such as Jasen Grimes, Merle Nielsen, Yoann Laferriere, and Wendy York. The 2011 PHA identified 27 findings and recommendations for improving the safety of the refrigeration system. The recommendation tracking sheet provided a due date for each recommendation but did not have completion dates.

The 2016 PHA revalidation was conducted by Sorrento Lactalis employees such as Olivier Sagory, Nate Helsley, Joel Allred, Wendy York, Wayne Stevenson and Nate Parker using a What-If/Checklist methodology. The 2016 PHA identified nine open 2011 PHA recommendations that were not resolved. The 2016 PHA tracking sheet did not document the completion dates for the findings.

Compliance Audit:
Sorrento Lactalis submitted their 2017 and 2020 compliance audits. The 2017 audit identified the following twenty-two findings: (1) six in process safety information; (2) four in process hazard analysis; (3) four in operating procedures; (4) five in mechanical integrity; (5) two in training and (6) one in incident investigation. No documentation was provided to show that these deficiencies had been corrected.

The 2020 audit identified the following thirteen deficiencies in Sorrento's procedures and practices: employee participation (2), process safety information (3), process hazard analysis (1), training (2), prestartup safety review (2), management of change (1), incident investigation (1), and compliance audits (1). No documentation was provided to show that these deficiencies have been corrected.

Training:
Sorrento Lactalis has five employees involved with the anhydrous ammonia refrigeration system. Two employees have Refrigerating Engineers and Technicians Association (RETA) training and certification (2012) or training that was received at the University of Wisconsin Madison (2016). Two other employees were trained on the standard operating procedures (SOP) while being observed or tested by their supervisor. The facility has been utilizing the SOPs for refresher training. One employee was only trained in Process Safety Management Audits by the University of Wisconsin Madison and in ammonia safety. Records for refresher training were not provided for each of the employees.

AREAS OF CONCERNS:

1. The 2011 and 2016 Process Hazard Analysis (PHA) did not have a method for tracking the recommendations and the completion dates of each recommendation.
2. The 2017 and 2020 compliance audits had no documentation indicating the deficiencies had been corrected.
3. Refresher training every three years has not been documented for all employees involved with the ammonia refrigeration system. No refresher training documentation was provided for the operator, Nathan Parker.

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. Repeated follow-up requests for the information were made after the initial email notification was sent on August 12, 2021. The documentation was received on October 13, 2021.

AUDIT REPORT CERTIFICATION:
This is to certify that I, Bob Hales, was the lead inspector at this facility and that I have verified the accuracy of the observations in this inspection report:

Hales, Bob Digitally signed by Hales, Bob
Date: 2022.02.14 09:54:28 -08'00'

JAVIER MORALES Digitally signed by JAVIER MORALES
Date: 2022.02.17 10:18:10 -08'00'

RMP Coordinator/Approval Date

ERIN WILLIAMS Digitally signed by ERIN WILLIAMS
Date: 2022.02.18 10:26:58 -08'00'

EPCRA Coordinator/Approval Date

Jennifer A Sullivan Digitally signed by Jennifer A Sullivan
Date: 2022.02.18 14:49:17 -08'00'

Land Enforcement Section Chief/Approval Date