

**Region 6 Enforcement and Compliance Assurance Division
INSPECTION REPORT**

Inspection Date(s):	8/21/2024-8/23/2024	
Media Program:	Air	
Regulatory Program(s)	Clean Air Act (CAA) § 112(r) and 40 Code of Federal Regulations (C.F.R.) Part 68 Chemical Accident Risk Management Plan (RMP) Program 3	
Company Name:	Hillshire Brands Company	
Facility Name:	Hillshire Brands Company	
Facility Physical Location:	3900 Meacham Boulevard	
(city, state, zip code)	Haltom City, TX 76117	
Mailing address:	3900 Meacham Boulevard	
(city, state, zip code)	Haltom City, TX 76117	
County/Parish:	Tarrant	
Facility Contact:	Graham Hancock 817-427-7970	Plant Manager
	graham.hancock@tyson.com	
FRS Number:	110033023163	
Identification/Permit Number:	1000 0009 4122	
Media Identifier Number:	1000115441	
NAICS:	311612 Meat Processed from Carcasses	
Personnel participating in inspection:		
Blake Sieminski	Lead Inspector/Enforcement Officer	U.S. EPA
John Penland	Enforcement Officer	U.S. EPA
Todd Hutson	Environmental Manager	Tyson Foods
Shaun Thompson	Sr. PSM/RMP Area Manager	Tyson Foods
Patrick Schuster	Maintenance Manager	Tyson Foods
Maribel Cruz	PSM Coordinator	Tyson Foods
Victor M. Irigoyen	Safety Manager	Tyson Foods
Eric Rodriguez	Sr. Environmental Manager	Tyson Foods
Graham Hancock	Plant Manager	Tyson Foods
Ron Black	CI Manager	Tyson Foods
Matthew Hernandez	Logistics Manager	Tyson Foods
EPA Lead Inspector Signature/Date		
	Blake Sieminski	Date
Supervisor, ECDSC Signature/Date		
	Samuel Tates	Date

Section I – INTRODUCTION PURPOSE OF THE INSPECTION

I, Blake Sieminski and John Penland, the Environmental Protection Agency (EPA) Region 6 inspectors arrived at the Hillshire Brands Company Facility at approximately 9:00 a.m. on August 21, 2024, for an announced inspection. I met with Hillshire Brands Company (Hillshire) facility representatives at the opening meeting. I presented my credentials and informed them that this was an EPA led inspection to determine compliance with the Clean Air Act (CAA) Section 112(r). The scope of the inspection was a partial compliance evaluation (PCE) and included evaluation of the compliance with 40 C.F.R. Part 68 – Chemical Accident Prevention Provisions, CAA Section 112(r)(7), and the General Duty Clause (GDC), CAA Section 112(r)(1).

FACILITY DESCRIPTION

Hillshire Brands, Haltom City, Texas plant is engaged in the wholesale production of corn dogs for human consumption. Raw materials received are beef, pork franks, turkey franks, corn, flour, sugar, cooking oil, sticks, and packaging materials. The corn dogs are processed, cooked, frozen, packaged, and stored for shipment. The facility processes beef franks from frozen beef but does not handle live animals or carcasses. The facility is located at 3900 Meacham Blvd. Haltom City, Texas 76117. The NAICS code is 311612 (meat processed from carcasses). Normal hours of operation are 5:45 a.m. to 11:15 p.m., six days per week. Normal hours for sanitation operations are 11:15 p.m. to 5:45 a.m., six days per week. The facility currently has 760 full time employees onsite, including plant and administrative personnel.

Section II – OBSERVATIONS

We conducted a walk-through of the facility, accompanied by facility representatives, to observe the facility process equipment, and overall operations. I used the Forward Looking Infrared (FLIR™) Series GF320 camera, and observed no spills, leaks, or fugitive hydrocarbon emission trails. Other inspection findings and observations are noted in the RMP Program Level 3 Checklist, located in **Appendix #1**.

During the walk-through, I observed that the facility was missing proper markings on piping – e.g., direction of flow, color-coding to identify the hazardous material present, placement of pipe labels, and type and size of letters on pipe labels, as required by the American National Standards Institute (ANSI) and the American Society of Mechanical Engineers (ASME) Standard ANSI/ASME A13.1, *Scheme for the Identification of Piping Systems*. This standard is considered a recognized and generally accepted good engineering practice for above ground piping systems [AOC 1: § 68.65(d)(2)].

Closing Meeting – EPA convened a closing meeting on August 23, 2024, to discuss the Areas of Concern (AOC) noted during the inspection, the inspection completion process, and to answer questions from plant representatives.

Section III – AREAS OF CONCERN

1. 40 C.F.R. § 68.65(d)(2)- Process safety information.

(d)(2) The owner or operator shall ensure and document that the process is designed and maintained in compliance with recognized and generally accepted good engineering practices.

Hillshire Brands Company failed to properly label and maintain the equipment and associated piping as required by ANSI/ASME Standard A13.1, *Scheme for the Identification of Piping Systems*.

2. 40 C.F.R. § 68.73(d)(1)- Mechanical Integrity

(d)(1) – Inspections and Testing. Inspections and tests shall be performed on process equipment.

Hillshire Brands Company failed to completely fill out the daily shift log sheet on December 30, 2022. Out of 180 potential inspection response, zero were selected.

3. 40 C.F.R. § 68.73(d)(4)- Mechanical Integrity

(d)(4) - The owner or operator shall document each inspection and test that has been performed on process equipment. The documentation shall identify the date of the inspection or test, the name of the person who performed the inspection or test, the serial number or other identifier of the equipment on which the inspection or test was performed, a description of the inspection or test performed, and the results of the inspection or test.

Hillshire Brands Company failed to document and correctly identify person who performed the inspection on process equipment. Specifically on the daily shift, an individual named Max signed the document as the individual conducting the inspections. However, this was not the name of the person conducting the inspection. During the document review it was explained that Max was a nickname for another individual and that was seen throughout multiple other documents during the inspection.

4. 40 C.F.R § 68.85(b)- Hot work Permit

(b) The permit shall document that the fire prevention and protection requirements in [29 CFR 1910.252\(a\)](#) have been implemented prior to beginning the hot work operations; it shall indicate the date(s) authorized for hot work; and identify the object on which hot work is to be performed.

Hillshire Brands Company failed to complete authorized hot work permits. Specifically, multiple hot work permits were missing review and closure signatures. Copies of the hot work were provided showing carbon copies of the forms were being filled out after the initial copy was separated.

5. 40 C.F.R. § 68.90 - 68.96- Emergency Response

68.93(b) - Emergency response coordination activities. Coordination shall include providing to the local emergency planning and response organizations: The stationary source's emergency response plan if one exists; emergency action plan; updated emergency contact information; and other information necessary for developing and implementing the local emergency response plan. For responding stationary sources, coordination shall also include consulting with local emergency response officials to establish appropriate schedules and plans for field and tabletop exercises required under § 68.96(b). The owner or operator shall request an opportunity to meet with the local emergency planning committee (or equivalent) and/or local fire department as appropriate to review and discuss those materials.

Hillshire Brands Company failed to provide the local emergency planning and response organization with an Emergency Action Plan that accurately represents their facility. Specifically, Hillshire submitted an Emergency Action Plan to the LEPC on 8/15/24 and that plan incorrectly identified SOPs that were not applicable to the subject facility and it's covered process.

Section IV – FOLLOW UP

There were no additional records requested and no additional follow up for this inspection.

Section V – LIST OF APPENDICES

Appendix #1 – RMP Program 1 Checklist

Symbol Key: Y - Yes, N - No, N/A - Not Applicable; S - Satisfactory, M - Marginal, U – Unsatisfactory.

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Hillshire Brands Company		
City: Haltom City	County/Parish: Tarrant	State: TX





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Hillshire Brands Company		
City: Haltom City	County/Parish: Tarrant	State: TX





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Hillshire Brands Company		
City: Haltom City	County/Parish: Tarrant	State: TX

