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

FACILITY INFORMATION:
Name: Lamb Weston Quincy Facility
Physical Address: 1005 E Street SW, Quincy, WA 98848
Phone Number: (509) 787-3567
Latitude/Longitude: 47.234404/-119.869753
EPA Facility ID# 1000 0002 7785

CONTACT INFORMATION (RMP Implementation):
Name: Jason Cobb, Plant Manager
Phone Number: (509) 787-3567
E-mail: jason.cobb@lambweston.com

EMERGENCY CONTACT INFORMATION:
Name: Michael Ellis, Plant Engineering Manager
Phone (24-hr): (509) 670-6058
E-mail: michael.ellis@lambweston.com
Website: https://www.lambweston.com/

AUDIT DETAILS:
Contact Date: January 11, 2021
Inspectors: Terry Garcia, US EPA Region 10 SEE Grantee, Lead RMP Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:
Initial Submission Date: June 11, 1999
Date of Latest Update: June 5, 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)
1000053649	Plant 1 Frozen Fruit, Juice, and Vegetable Manufacturing	1000065293	311411	3	Ammonia, Anhydrous (7664-41-7)	15,936
1000096838	Plant 2 Frozen Fruit, Juice, and Vegetable Manufacturing	1000121192	311411	3	Ammonia, Anhydrous (7664-41-7)	17,933

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 ☒

CAA Title V Air Permit:
Does the facility have a CAA Title V Permit? No ☒ Yes ☐
If Yes, Permit Number:

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

EPCRA TIER II REPORTING:
Did the facility submit their 2020 Tier II report to the SERC? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: 3/3/2021 (updated)
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: 2/25/2021

GENERAL INFORMATION:
The Lamb Weston Quincy (LWQ) facility is regulated under the Risk Management Program as a Program Level 3 process and is owned and operated by Lamb Weston Inc. The LWQ facility produces various potato products such as French fries, diced hash browns, and formed potato products. The facility consists of three processing plants: cold storage, raw potato storage and receiving buildings, and a boiler facility. The facility has two independent ammonia refrigeration systems identified as Plant 1 and Plant 2. Both refrigeration systems reported anhydrous ammonia inventory exceed the threshold quantity (TQ) of 10,000 pounds for anhydrous ammonia. There are 415 full-time employees on site.

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)**: LWQ facility provided their 2014 and 2019 PHA. The 2014 PHA was conducted on March 17 and 18, 2014 by Sunday & Associates and the 2019 PHA was conducted on May 1 and 2, 2019 by Frank Fabian, Principal Engineer. Both PHAs used the What/If methodology. LWQ stated that the 2019 PHA PSM Revalidation will be considered as a baseline for future PHAs.

   The 2014 PHA Revalidation has four open findings with a due date of August and October 2018.

The following 2014 PHA Findings were verified completed in January 8, 2021: (1) Evaporative Condenser, Item# PHA-14-12C, (2) Safety Relief Valves, Item# PHA-14-13D, (3) Pump Out Valve, Item# PHA-14-21C and (4) Human Factors, Operator/Process Interface, Item# PHA-14-28C.

The 2019 PHA Revalidation identified 20 recommendations and the most important recommendations were to develop a cool down procedure for an auto purger and maintenance and inspection schedules. In addition, 2019 PHA Item #7 stated that the operators did not receive communication of PHA findings and resolutions.

2. **Compliance Audit**: LWQ submitted the June 11-12, 2015 and June 6-8, 2018 Compliance Audit reports. The compliance audits were facilitated by Stephen J. Nelson, PE, Coal Creek Environmental Associates and David Einolf, Endeavour EHS. The 2018 compliance audit identified seventeen (17) findings (16 closed, 1 open). The action item, finding #28, Process Safety Information, addressing issues with sensors and e-stop following recognized and generally accepted engineering practices (RAGAGEP) has a due date of April 2021.

3. **Training**: LWQ submitted training documentation for their four operators. Initial training documentation was not provided for two seasoned operators (Mr. Martin Gonzales 8-25-1998 and Mr. Kevin Gumke,11-14-1978). The Elements of Training Requirements for Operators, PSMF 601, states that 'grandfathered' operators do not need to complete initial training. Mr. Brandon Mauseth stated the facility did not maintain the certification documenting in writing for any training exemption for their operators. The 2018 compliance audit finding, Item# 17, 18 and 19 identified this issue stating the auditor did not observe any grandfathered documents (pg. 25/79). Mr. Martin Perales was late in his refresher training schedule due to COVID-19. LWQ was unable to locate the refresher training for Mr. Rafael Zepeda. The 2018 compliance audit finding, Item #9 identified this issue stating, "No observed recent documentation regarding employee consultation on the frequency of refresher trainings." (pg. 106/203). Mr. Mauseth stated that the facility plans on resolving training issues during the March 2021 refresher training.

AREAS OF CONCERN:

1. **Process Hazard Analysis (PHA)**: The owner or operator shall establish a system to promptly address the team's findings and recommendations; assure that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete actions as soon as possible; develop a written schedule of when these actions are to be completed; communicate the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions as required by 40 C.F.R. 68.67(e). The 2014 PHA Revalidation had four open findings with a due date of August and October 2018. These findings were completed in January 2021 which is seven years past the due date. In addition, the 2019 PHA Item #7 stated that the operators did not receive communication of PHA findings and resolutions.

2. **Mechanical Integrity (MI)**: LWQ provided their 2017 MI Audit performed by Kemper Refrigeration that identified 426 findings. The 2017 MI Audit shows 357 closed findings and 69 findings remaining open with a scheduled completion date of December 2021. The MI Audit stated that relief engineering was inadequate in both engines room on process equipment and areas affected by corrosion should be cleaned and painted, tagging of valves, bringing piping and support systems up to current codes and standards throughout the plant.

The 2018 Compliance Audit and 2019 PHA identified issues with the inspection and testing procedures for equipment. The 2018 audit Finding, Item #3 stated that several required inspections for equipment is missing in Inspection, Testing and Preventative Maintenance (ITPM) procedures (Reference Attachment 9A of the Mechanical Integrity Program). The 2019 PHA Introduction stated, "to develop maintenance and inspection schedules" (pg. 12/89).

3. **Training**: 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 as required by 40 C.F.R § 68.71(a)(1). LWQ was unable to produce initial training documentation for Mr. Gumke and Mr. Gonzales. LWQ later provided signed certified training documents dated February 25, 2021 for Mr. Gumke and Mr. Gonzales.

4. **Training**: In lieu of initial training for those employees already involved in operating a process on June 21, 1999 an owner or operator may certify in writing that the employee has the required knowledge, skills, and abilities to safely carry out the duties and responsibilities as specified in the operating procedures as required by 40 C.F.R § 68.71(a)(2). LWQ was able to produce "grandfather certificates" in lieu of initial training documentation for two seasoned employees, Mr. Gumke and Mr. Gonzales. LWQ later provided signed certified training documents dated February 25, 2021 for Mr. Gumke and Mr. Gonzales.

7. **Training**: 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. LWQ was unable to produce refresher training documents for their four operators.

   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. A copy of the 2017 Mechanical Integrity Audit including the tracking of the findings and recommendations.
2. A copy of the June 2018 Compliance Audit, Attachment B, PSM/RMP Audit Findings Table.
3. Training certification documents for seasoned operators, Mr. Gumke and Mr. Gonzales, who were involved in operating the refrigeration system since June 1999.
4. A copy of the LWQ facility's Policies and Procedures Training for PSM Operators and Maintenance.
5. Requested names of all operators that did not receive initial training and the dates scheduled for their training.
6. Requested training documentation if facility confirmed they were a first responder.

LWQ submitted additional information for review on February 21 and March 10, and March 18, 2021.

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

Garcia, Terry L. Digitally signed by Garcia, Terry L.
Date: 2021.05.27 14:46:41 -07'00'

Signature Date

JAVIER MORALES Digitally signed by JAVIER MORALES
Date: 2021.05.27 14:59:00 -07'00'

RMP Coordinator/Approval Date

ERIN WILLIAMS Digitally signed by ERIN WILLIAMS
Date: 2021.05.27 14:48:36 -07'00'

EPCRA Coordinator/Approval Date

Jennifer A Sullivan Digitally signed by Jennifer A Sullivan
Date: 2021.05.27 15:53:21 -07'00'

Land Enforcement Section Chief/Approval Date