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

FACILITY INFORMATION:
Name: CPC International Apple Co.
Physical Address: 909 Naches Avenue, Yakima, WA 98947
Phone Number: (509) 673-3113
Latitude/Longitude: 46.420513/120.452454
EPA Facility ID# 1000 0022 6258

CONTACT INFORMATION (RMP Implementation):
Name: Brandon Meara, Refrigeration Manager
Phone Number: (509) 480-0400
E-mail: brandon@cpcintlappleco.com

EMERGENCY CONTACT INFORMATION:
Name: Brandon Meara Refrigeration Manager
Phone (24-hr): (509) 673-3113 (509) 480-0400
E-mail: brandon@cpcintlappleco.com
Website: www.cpcintetlappco.com

AUDIT DETAILS:
Contact Date: August 23, 2021
Inspectors: Terry Garcia, US EPA Region 10 SEE Grantee, Lead RMP Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:
Initial Submission Date: July 3, 2014
Date of Latest Update: December 20, 2021

Process Program 3 as reported in RMP:

Process ID	Description	Process Chemical ID	NAICS Code	Program Level	Chemical Name CAS Number	Quantity (lbs.)
1000121710	Refrigerated Warehousing and Storage	1000152372	49312	3	Ammonia, Anhydrous (7664-41-7)	12,881
1000121709	Refrigerated Warehousing and Storage	1000152371	49312	3	Ammonia, Anhydrous (7664-41-7)	11,500
1000121711	System #3	1000152373	49312	3	Ammonia, Anhydrous (7664-41-7)	11,500

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 ☐
  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 ☒
If Yes, Date and Description of the Release: On February 10, 2017, CPC International Apple Co. reported an ammonia release that occurred in the engine room (MR2). The ammonia release was caused by a relief valve piping extending thru the roof that was damaged by snow and ice which broke a nipple on the surge drum. There were no reported injuries. Approximately 175 pounds of ammonia was released. Reference NRC#1170772. CPC International Apple Co. verbally notified the WA SERC and LEPC via voice mail at the time of the release (Incident Number 17-0503). CPC International Apple Co. did provide a written follow up document dated 2/14/2017) within 30 days.

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: 1/15/21. The 2020 Tier II reports a maximum number of 20 occupants at this site and this is a discrepancy with the latest (2021) RMP report, which notes 325 employees onsite.

Did the facility submit a Tier II to the LEPC and local fire department? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: Hand delivered on 1/18/21. Mr. Meara stated that they file (hand deliver) them yearly with the Fire Department since it is a small town. Richard J. Woodall-Fire Chief, Yakima County Fire District #1, Highland Fire & Rescue, Cowiche, WA 98923, C (509) 952-0072.

GENERAL INFORMATION:
The facility is regulated under the Risk Management Program as a Program Level 3 process and is owned and operated by CPC International Apple Co. The CPC International Apple Co. facility is an apple storage and processing plant. The facility has five ammonia refrigeration systems.[1] Engine Room #2 (ER#2) refrigeration system consists of an engine room, a controlled atmosphere (CA) room and seventeen (17) common storage rooms. This type of refrigeration system uses a flooded system and a pressure regulator to control temperature. The main pressure vessels located in the engine room are a high-pressure receiver, suction accumulator, and liquid transfer unit. ER#2 contains compressors, which pull the vapor from the suction accumulator and discharge the vapor to evaporative condensers located on the roof, above the engine room. The high-pressure receiver with maximum capacity of 18,689 pounds of ammonia is filled to 80% capacity for the operation of the refrigeration system. The ammonia inventory reported for the ER #2 is 12,881 pounds. Engine Room #3 (ER#3) refrigeration system has a reported ammonia inventory of 11,500 pounds.[2] Engine Room #4 (ER#4), Engine Room #5 (ER#5) and Engine Room #6 (ER#6) refrigeration systems all have an ammonia inventory of 9,000 pounds that is below the threshold quantity of 10,000 pounds of ammonia.[3] There are 325 full-time employees on site.

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[1] See Attachment A for facility siting.
[2] ER#3 refrigeration system was reported in the RMP dated November 14, 2017, with an amount of 11,500 pounds of ammonia. ER#3 system called System #3 was reported again in the RMP dated December 20, 2021, with the same ammonia inventory amount.
[3] Reported in the WA SERC facility Tier II reporting history, https://secureaccess.wa.gov/ecy/epcra/FacilityReport.aspx

The facility is not a first responder and relies on the Yakima County Fire Hazmat Team.

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:

Process Hazard Analysis, 68.67:
The initial 2014 PHA conducted on June 27, 2014, was completed June 30, 2014, by the third party, Ammonia Compliance Consulting, Mike Davis, and CPC Refrigeration Manager, Dennis Robison. The PHA study used the What IF/Checklist methodology. The PHA team identified thirteen (13) findings and recommendations that were closed by July 9, 2014.

The November 7-11, 2017, PHA for ER#2 was completed by CPC employees, Jeremy Van Vleck, Food Safety, and Brandon Meara, Refrigeration Manager. The PHA study used the What IF/Checklist methodology. The PHA team identified seven (7) findings and recommendations that were closed on February 22, 2021.

The 2014 and 2017 PHA findings tracking report identified a person responsible and date completed for the findings and recommendations. The tracking report did not document any resolutions and actions for the findings and recommendations. This PHA issue was also identified at the CPC International Apple Co. Tieton, WA facility (EPA ID # 1000 0022 7827 in 2020 by EPA.

CPC International Apple Co. did not provide a PHA for the ER#3 refrigeration system that has been in operation since 2016.[4]

Compliance Audits, 68.79:
The June 2014 and November 2017 Compliance Audit reports were provided for review. The audit reports did not identify team members, due dates, completion dates, and with no certifying signatures (on 2014 audit). On September 21, 2021, after the initial request, CPC International Apple Co. provided the 2020 Compliance Audit report dated May 12-15, 2020, including the certification cover pages for the 2014 and 2017 audit reports. The 2017 and 2020 audits were signed by Brandon Meara and Jeremy Van Vleck, Food Safety. The 2014 audit certification cover page was not signed. The 2020 audit has 13 findings that were carried over from the 2017 audit that were not resolved. For example, the audits stated that they are not documenting any resolutions and/or action item for the findings.

[4] Review of Tier II reporting history showed the ammonia inventory was first reported in 2016 for ER#3.

Training, 68.71:
CPC International Apple Co. provided a training summary for three operators (Brandon Meara 3/5/2012, Travis Cooper 6/1/1995, and Dylan Cruz 7/15/2020) completed by Refrigeration Manager, Mr. Meara claiming site specific SOP and maintenance training information. No initial and refresher training documentation was provided for the operators covering site specific operating procedures. No training documentation was provided that demonstrates that the facility maintenance staff received training on plant specific procedures. Training certificates and exams were provided for an eight hour ammonia safety training for the three operators conducted by Ammonia Safety and Training Institute.

CPC International Apple Co. provided their training procedure titled, PSM 5 CPC INTL Engine Room 2 Employee Training Program, outlining the corporate operator and maintenance training requirements. In the training procedure, Section 3.0, Competency Requirements, states that management is responsible for verifying that employees understand training. No documentation was provided.

AREAS OF CONCERNS:

1. **Process Hazard Analysis, 68.67**: CPC International Apple Co. did not provide a PHA for the ER#3 refrigeration system that has been in operation since 2016. In addition, they did not update and re-validate PHA at least every five years for ER#3 in 2021.

2. **Training, 68.71**: CPC International Apple Co. did not provide initial and refresher training documentation to demonstrate that training occurred for their operators covering ER#2 and ER#3.

3. **Documentation Training, 68.71(c)**: CPC International Apple Co. did not document the identity of each employee involved in the process, date of training, that the training is understood by the employee, and means used to verify understanding for initial and refresher training. ER#2 SOP Overview annual review documents dated between February 2021 and March 2016 done annually were provided but does not list specific operating procedures and were signed by the Refrigeration Manager and Techs.

4. **RMP Correction**: CPC International Apple Co. reported ER#3 refrigeration system twice as a covered process in their RMP dated November 14, 2017, and December 20, 2021. CPC International Apple Co. has to correct their RMP to show only one correct covered process for ER#3.

5. **Compliance Audit, 68.79**: CPC International Apple Co. did not provide documentation on the tracking of findings for their 2017 and 2020 Compliance Audit reports. The 2020 audit indicated 13 open findings, many carried over from the 2017 audit.

6. **Incident Investigation, 68.81**: CPC International Apple Co. did not provide the incident investigation report for the ammonia release that occurred on February 10, 2017.

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. On September 17, 2021, CPC International Apple Co. (CPC) provided additional training documents and information on compliance audits and PHA.
2. On September 21 and 23, 2021, CPC provided additional information to clarify the two ammonia refrigeration systems identified in the RMP dated November 14, 2017.
3. CPC provided a block flow diagram for all six engine rooms and ammonia quantities.
4. CPC provided completed MOC and PSSR forms were for ER#2.
5. CPC provided a SCS Tracer contractor proposal dated 9/29/21 entitled Proposal for System 3 PSM/RMP Prevention Program, PSM/RMP Quarterly Meetings, Three Year Compliance Audit and Five Year PHA was provided for the ER#3 refrigeration system.
6. CPC provided training documents for Denis Robison.
7. CPC provided additional information on the 2017 ammonia release.

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:

Terry Garcia Digitally signed by Terry Garcia
Date: 2022.03.02 17:04:47 -08'00'

JAVIER MORALES Digitally signed by JAVIER MORALES
Date: 2022.03.03 08:18:39 -08'00'

RMP Coordinator/Approval Date

ERIN WILLIAMS Digitally signed by ERIN WILLIAMS
Date: 2022.03.03 09:25:37 -08'00'

EPCRA Coordinator/Approval Date

Jennifer A Sullivan Digitally signed by Jennifer A Sullivan
Date: 2022.03.03 13:22:44 -08'00'

Land Enforcement Section Chief/Approval Date