



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 155
Seattle, WA 98101

ENFORCEMENT &
COMPLIANCE ASSURANCE
DIVISION

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

FACILITY INFORMATION:

Name: Fruitsmart
Physical Address: 1125 Sheridan Ave.
Phone Number: 509-882-9956
Latitude/Longitude: 46.205833/-119.772500
RMP Facility ID#: 100000107555
FRS ID#: 110000554196
EJ Concerns: Yes - greater than 80 percent

CONTACT INFORMATION (RMP Implementation):

Name: Scott Evenson, Director of Facilities
Phone Number: 509-882-9956
E-mail: sevenson@fruitsmart.com

EMERGENCY CONTACT INFORMATION:

Name: Elton Brown, Maintenance Manager
Phone (24-hr): 509-882-9956
E-mail: ebrown@fruitsmart.com
Website: www.fruitsmart.com

TRIP DETAILS:

Inspection Date: 6/27/2023
Inspection Time: 09:00 through 14:45
Inspectors: Peter Phillips, US EPA Region 10 SEE Grantee, Lead RMP/EPCRA Inspector
Terry Garcia, US EPA Region 10 SEE Grantee, RMP/EPCRA Inspector
Edward Johannes, US EPA Region 10 SEE Grantee, RMP/EPCRA Inspector
Mhara Coffman, US EPA Region 10, RMP/EPCRA Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: 6/21/1999
Date of Latest Update: 3/23/2023

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)
1000083177	Refrigerated Warehousing and Storage	1000163164	49312	3	Ammonia (anhydrous) 7664-41-7	21,157

PURPOSE:

The purpose of this inspection 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.

- The facility has been previously inspected in the past 5 years: 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 ☐

EPCRA TIER II REPORTING:

Did the facility submit the 2022 Tier II report to the SERC? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 2/1/2023

Did the facility submit a Tier II to the LEPC and local fire department? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 2/1/2023

INSPECTION ENTRY:

Peter Phillips led the inspection entry. The inspection team met with Paul Dickman at the Fruitmart facility in Prosser, Washington. The team arrived at the facility at 09:00 and was joined by the following facility personnel:

Name	Title
Vanessa Flores	Safety Specialist
Arasele Zuniga	HR Manager
Scott Evenson	Product Planning
Elton Brown	Maintenance Manager
Eli Asevedo	Logistics Manager
Deanna Davis	Benton County LEPC

Was a state/county/or local emergency representative present? No ☐ Yes ☒

If Yes, Name and Title of Representative: Deanna Davis, Benton County LEPC

The facility is a first responder: No ☒ Yes ☒

If No, Responding Agency: Prosser Fire Department

The inspection team was escorted to a conference room located in the facility's office building. Introductions were made by Peter Phillips, who provided a summary of the risk management program (RMP) and explained the purpose of the visit. Each team member presented his/her credentials.

EPA then requested an explanation of the facility's operations and any additional safety measures that should be taken during the site tour. Elton Brown gave a brief description of the facility, operations, and personal protective equipment required for the tour. The facility required closed-toe shoes, hearing protection, safety glasses, and hair nets for the facility tour.

Prior to the inspection, EPA sent a certified notice of inspection letter to the facility informing them of the 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, and that a copy of the letter must be provided to the employee representative(s) and the letter posted in a manner accessible to employees in the facility.

The facility is unionized: No ☒ Yes ☐

An employee representative present during the facility visit: No ☒ Yes ☐

GENERAL INFORMATION:

The facility, owned and operated by Fruitsmart, Inc. (Fruitsmart), is under the jurisdiction of the Risk Management Program as a Program Level 3 facility. Fruitsmart functions primarily as a cold storage facility and utilizes anhydrous ammonia (at a quantity of 21,157 pounds) as a refrigerant. The amount of anhydrous ammonia stored and used at the facility exceeds the threshold quantity of 10,000 pounds. The facility employs approximately 50 full-time personnel includes two individuals specifically assigned to operate and maintain the ammonia refrigeration process.

The facility is located in Prosser, a city in Benton County, Washington. Originally constructed in the 1940s, the facility underwent its most recent modification in 1992 with the inclusion of a cold storage room. Fruitsmart's 335,000 square foot, 19-acre campus contains dry ingredient processing, a freezer facility, and corporate offices. The primary output of the facility consists of juice products, fruit pomace, seed oil, and cider-producing bases. The facility operates 24/7 with 4 rotating shifts. A mechanical integrity audit was performed in 2017 by Kemper. All identified deficiencies have been addressed. The next mechanical integrity will be conducted by AAPCO and will start during the last week of July 2023. Standard Operating Procedures are accessible in both binder and digital forms.

The facility's ammonia refrigeration process consists of the following major equipment:

- 1 engine room
 - 2 compressors (one compressor was out of service)
 - 4 ammonia detectors
- 3 interconnected vessels comprise the high pressure receiver (HPR)
- 1 low pressure receiver (LPR)
- 1 cold room
 - 9 evaporators
 - 3 ammonia detectors
- 6 condensers
- 1 dry storage room (no anhydrous ammonia present)

There have not been any significant additions or modifications of the covered process.

ON-SITE OBSERVATIONS:

The facility tour was conducted from approximately 09:45 to 10:15. The inspection team was escorted by Vanessa Flores, Arasele Zuniga, Scott Evenson, Elton Brown, Eli Asevedo, and Deanna Davis. The inspection team observed the major process areas of the ammonia refrigeration process given below.

Engine Room:

The doors were placarded and accessible only by authorized personnel (photos 2 and 4). Emergency eyewash and shower stations were located adjacent to the doors (photo 2). Audible and visual alarms, as well as emergency shutdown switches and ventilation controls, were present (photos 3 and 4). The main equipment observed were two screw compressors (photo 5), three interconnected vessels comprise the high-pressure receiver (photo 6), one low-pressure receiver (photo 8), and four ammonia detectors (photo 20). The King Valve on the high-pressure receiver was clearly labeled (photo 15). The ventilation system has two fresh air intakes (photo 14) and two exhaust fans (photo 16). Pressure relief valves (PRV) were scheduled for replacement in 2025 (photo 9). Piping in the engine room were labeled with flow direction and ammonia state (photo 6). Several non-destructive testing points from the 2017 mechanical integrity audit were observed (photos 10, 13, and 19). There were several decommissioned vessels and one reciprocating compressor that have not yet been removed due to cost and logistics (photos 7 and 17). A series of six condensers and a windsock were observed atop the engine room (photo 1).

Cold Room:

Fruitsmart has a single high rack storage room where products are held until shipment. The cold storage room is equipped with nine evaporators and three ammonia detectors (photos 20 and 21).

Safety Systems:

The facility has a number of process safety equipment located throughout the facility. Ammonia detectors in the engine room and cold storage room are set to warn at 25 ppm and alarm at 150 ppm. The ammonia detector in the PRV vent stack is set to alarm at 1,000 ppm (photo 12). Several emergency showers/eye wash stations were observed along with emergency shutoff and ventilation switches (photos 2, 3, and 4). Other safety systems observed were strobes, alarms, and a fire sprinkler system (photos 2, 3, and 4).

Photographs were taken of the ammonia refrigeration system. The photographs that were taken at the facility are included in Attachment A to this report.

After touring the RMP-covered process areas at the Fruitsmart facility, the inspection team returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to Vanessa Flores, Arasele Zuniga, Scott Evenson, Elton Brown, and Eli Asevedo.

INFORMATION COLLECTED FROM FACILITY:

1. A site map of the facility
2. 2017 mechanical integrity summary

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

1. **Process Hazard Analysis (PHA) [68.67(a)]:** Fruitsmart could not produce the initial PHA performed in 1999. The facility is required to retain all PHAs for the life of the process.

2. **Training [68.71(a)(1)]:** Fruitsmart could not produce documentation that their operator, Elton Brown (hired on 1/3/1979) received initial training on the process. Initial training includes emphasis on safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks.
3. **Mechanical Integrity [68.73(c)]:** Fruitsmart could not produce documentation that their operators, Elton Brown (hired on 1/3/1979) and Casey Hofstadt (hired on 9/6/1994) received training in maintaining the integrity of the process equipment.
4. **Contractors [68.87(b)(5)]:** Fruitsmart could not produce documentation that periodically evaluated the performance of Kemper Northwest, Empire Controls, and All Phase in fulfilling their obligations (as described at 68.87(c)(1)-(c)(5)).
5. **Emergency Response [68.93(c)]:** Fruitsmart was unable to provide documentation of coordination with local emergency response authorities. The documentation requested included the names, contact information, and organizational affiliations of the individuals involved, as well as the dates and details of coordination activities. The only relevant documentation Fruitsmart provided was an email sent to the West Benton County Fire District on July 5, 2023, and an Emergency Action & Response Plan Drill/Evacuation Critique Form.

DOCUMENTS REQUESTED NOT INCLUDED IN REPORT:

The following documents were requested during the inspection but are not included in this report. These documents will still be reviewed to determine compliance with Section 112(r) of the Clean Air Act. The follow-up information requested was received via email on 7/19/2023.

Follow-up Request	Status
1. Initial training for Elton Brown and [68.67(a)]	Not provided
2. Process maintenance training for Elton Brown and Casey Hoffstadt	Not provided
3. The initial 1999 PHA	Not provided
4. RMP organizational responsibilities	Provided
5. Contractor vetting for Empire Controls, Kemper, and All Phase	Provided for Empire Controls and All Phase
6. Contractor periodic evaluation for Empire Controls, Kemper, and All Phase	Not provided
7. Evacuation coordination documentation	Email to West Benton County Fire District dated 7/5/2023 and an Emergency Action & Response Plan Drill/Evacuation Critique Form

INSPECTION REPORT CERTIFICATION:

This is to certify that I, Peter Phillips, was the lead inspector at this facility and that I have verified the accuracy of the observations in this inspection report:

PETER PHILLIPS
(Affiliate)

Digitally signed by PETER
PHILLIPS (Affiliate)
Date: 2023.10.31 13:43:09 -07'00'

Inspector Signature

JAVIER MORALES

Digitally signed by JAVIER
MORALES
Date: 2023.10.31 15:05:53 -07'00'

RMP Coordinator/Approval

ERIN WILLIAMS

Digitally signed by ERIN WILLIAMS
Date: 2023.11.06 15:06:46 -08'00'

EPCRA Coordinator/Approval

**MATTHEW
QUARTERMAN**

Digitally signed by MATTHEW
QUARTERMAN
Date: 2023.11.09 12:32:27 -08'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: Fruitsmart

City, State: Prosser, WA

Photographer: Peter Phillips

File Name	Photo	Date	Time	Description
IMG_0138.JPG	1	6/27/2023	9:47 AM	Condensers atop engine room
IMG_0139.JPG	2	6/27/2023	9:48 AM	Engine room door and shower/eye wash station
IMG_0140.JPG	3	6/27/2023	9:48 AM	Engine room door emergency stop
IMG_0141.JPG	4	6/27/2023	9:48 AM	Engine room door opposite side
IMG_0142.JPG	5	6/27/2023	9:49 AM	Engine room compressor overview
IMG_0143.JPG	6	6/27/2023	9:49 AM	Engine room vessel overview
IMG_0144.JPG	7	6/27/2023	9:50 AM	Out of service compressor
IMG_0145.JPG	8	6/27/2023	9:50 AM	Low pressure receiver
IMG_0146.JPG	9	6/27/2023	9:51 AM	Pressure relief tag
IMG_0147.JPG	10	6/27/2023	9:51 AM	NDT points and corrosion under insulation (CUI) on pipe
IMG_0148.JPG	11	6/27/2023	9:52 AM	Engine room ammonia detector
IMG_0149.JPG	12	6/27/2023	9:52 AM	Vent line ammonia detector
IMG_0150.JPG	13	6/27/2023	9:53 AM	NDT points on vessel
IMG_0151.JPG	14	6/27/2023	9:53 AM	Engine room ventilation intake
IMG_0152.JPG	15	6/27/2023	9:54 AM	HPR king valve
IMG_0153.JPG	16	6/27/2023	9:55 AM	Engine room exhaust fan
IMG_0154.JPG	17	6/27/2023	9:56 AM	Out of service vessels in engine room
IMG_0155.JPG	18	6/27/2023	9:56 AM	Cutaway of out of service vessel in engine room
IMG_0156.JPG	19	6/27/2023	9:57 AM	Valve CUI
IMG_0157.JPG	20	6/27/2023	10:02 AM	Cold storage ammonia pipe from engine room
IMG_0158.JPG	21	6/27/2023	10:03 AM	Cold storage room evaporator
IMG_0159.JPG	22	6/27/2023	10:07 AM	Forklift charging station