



**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: OFD Foods, LLC Plant 2 & 3
Physical Address: 525 25th Ave SW, Albany, OR 97322
Phone Number: 541-926-6001
Latitude/Longitude: 44.617944, -123.107111
RMP Facility ID#: 1000 0019 8458
FRS ID#: 110000544929
EJ Concerns: No (below 80%)

CONTACT INFORMATION (RMP Implementation):

Name: Gray Johnson
Phone Number: 541-967-6413
E-mail: gray.johson@ofd.com

EMERGENCY CONTACT INFORMATION:

Name: Gray Johnson
Phone (24-hr): 541-967-6413
E-mail: gray.johson@ofd.com
Website: ofd.com

TRIP DETAILS:

Inspection Date: June 28, 2022
Inspection Time: 0900 hours through 1430 hours
EPA Inspection Team: Peter Phillips, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Terry Garcia, US EPA Region 10 SEE Grantee, RMP Inspector
Edward Johannes, US EPA Region 10 SEE Grantee, RMP Inspector
Tom Vroman, CIH, Weston Solutions, Inc., EPA START Contractor

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: March 22, 2007
Date of Latest Update: March 1, 2022

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)
1000118169	Anhydrous Ammonia	1000147751	311423	3	Ammonia, Anhydrous (7664-41-7)	40,000

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: 3/15/2022

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

If Yes, Date the Tier II was submitted: 3/15/2022

INSPECTION ENTRY:

Peter Phillips led the inspection entry. The inspection team met with Gary Johnson at the OFD Foods, LLC main office in Albany, Oregon. The team arrived at the facility at 09:00 and was joined by the following facility and contracted personnel:

Name	Title
Gary Johnson	OFD Engineer
Jason Luty	HSE Manager
Jacques Muluc	Maintenance Manager
Bradley Marshall	OFD Refrigeration Coordinator
Greg Skaer	OFD Consultant

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

The facility is a first responder: No ☐ Yes ☒

If No, Responding Agency: Albany Fire Department

Facility representatives escorted the EPA Inspection Team (EPA) 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. Gary Johnson gave a brief description of the facility, operations, and personal protective equipment required for the 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 is regulated under the Risk Management Program as a Program Level 3 facility and is owned and operated by OFD Foods, LLC. OFD operates an anhydrous ammonia refrigeration process within Plants 2 & 3 to refrigerate and freeze dry food, pharmaceuticals, and medical devices. Anhydrous ammonia runs through system components within the facility and on the roof. There are no process modifications in the anhydrous ammonia refrigeration process. Plants 2 & 3 are supported by approximately 150 employees. The plant operates 24 hours a day, seven days a week, with two, 12-hour shifts each day. OFD has four trained operators for their ammonia refrigeration system.

OFD maintains an internal facility response team, consisting of 33 employees who receive annual training. Supplies for their response team are located next to the parking lot of Plant 1, and at an exterior area of Plants 2 and 3 (Photo 3). OFD also coordinates with the Albany Oregon Fire Department for emergency response preparedness.

ON-SITE OBSERVATIONS:

The facility tour for Plants 2 & 3 was conducted from approximately 1000 hours to 1100 hours. Plants 2 & 3 (Photos 1, 2) were undergoing annual maintenance during inspection. The inspection team was escorted by Gary Johnson, Jacques Muluc, and Greg Skaer. Plants 2 & 3 have 40,000 pounds of anhydrous ammonia contained in two adjacent engine rooms designated as South Engine Room and North Engine Room. The engine rooms are labeled on the exterior of the building, and each includes audio/visual alarms installed outside and inside each room (Photo 4, 15, 18). The facility is equipped with ammonia alarms that are set with a low alarm at 25 ppm and a high alarm of 2 percent concentrations of ammonia in the air (Photos 8, 16). The engine rooms contain control panels which enable emergency stops for the refrigeration system (Photo 5), and includes emergency washing stations (Photos 6, 17).

EPA observed refrigeration equipment at the exterior areas of Plants 2 & 3, South Engine Room, and North Engine Room. The South Engine Room equipment includes a pressure relief valve (Photo 7, 12, 13, 14), intake vent (Photo 9), exhaust vents (Photo 10), and an ammonia high pressure receiver (HPR) tank (Photo 11). The North Engine Room equipment includes intake vents (Photo 19), and an ammonia HPR tank covered with ice (Photos 20, 21).

The facility area designated as LPR3 and ammonia supply lines and associated ammonia sensors and alarms were observed (Photos 22, 23, 24). EPA observed that facility representatives could not provide a specific list of employees who held access door to LPR3 (Photo 25).

EPA observed one of four cold rooms at Plants 2 and 3. The Cold Room includes freeze dry chambers where chillers/evaporators utilize anhydrous ammonia to freeze dry product (Photo 26, 27), a low-pressure receiver tank (Photo 31) and ammonia supply lines to the chillers/evaporators (Photos 30, 31, 32). The Cold Room safety controls include ammonia sensors and alarms (Photos 30, 32, 33), a lockout/tagout system (Photos 29, 34), and control panels with emergency stops (Photos 28, 29).

The refrigeration system equipment on the rooftop of Plants 2 and 3, include ammonia supply lines (Photos 36, 37, 38), operational and decommissioned condensers (Photos 39, 40), and external engine room intake vents (Photos 38, 41, 42). Safety features observed on the rooftop include a windsock (Photo 35), and a lockout/tagout system supporting facility processes (Photo 43). During the inspection, EPA observed that the facility was actively implementing the lockout/tagout system on the rooftop to support employees performing maintenance in South Engine Room (Photo 43).

Photographs taken at the facility are included in Attachment A to this report.

After touring the RMP-covered process areas at Plants 2 & 3, EPA returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to the following people: Gary Johnson, Jason Luty, Jacques Muluc, Bradley Marshall, and Greg Skaer.

INFORMATION COLLECTED FROM FACILITY:

1. Visitor Rules and Regulations (1 page)
2. 2022 PSM/RMP Audit Report (7 pages)
3. Site Plan – Plant 1 (1 page 11 x 14 inches)

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

No areas of concern were identified in the closing conference.

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.

On 7/22/2022, OFD provided the requested information via email.

1. Updated 2022 RAGAGEPs List. The document was reviewed, and no issues were identified.
2. 2022 Compliance Audit Finding Tracking Sheet. The document was reviewed, and no issues were identified. All findings were assigned, completed, or had completion dates assigned.
3. Contractor Evaluations from Human Resources. OFD provided evaluation forms and OSHA 100 forms for the four contractors performing work on or near the refrigeration process. The document was reviewed, and no issues were identified.
4. Updated OFD Piping Specifications. The document was reviewed, and no issues were identified.

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: 2022.09.12 14:39:29 -07'00'

Inspector Signature

JAVIER MORALES

Digitally signed by JAVIER
MORALES
Date: 2022.09.12 14:55:05 -07'00'

RMP Coordinator/Approval

ERIN WILLIAMS

Digitally signed by ERIN WILLIAMS
Date: 2022.09.13 16:02:09 -07'00'

EPCRA Coordinator/Approval

Jennifer A Sullivan

Digitally signed by Jennifer A
Sullivan
Date: 2022.09.14 10:49:02 -07'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: OFD Plant 2 & 3

City, State: Albany, OR

Photographer: Tom Vroman

File	Photo Layout ID	Date	Time	Description
Picture 1.jpg	1	6/28/2022	10:08 AM	NFPA placard, Plant 2 & 3 exterior
Picture 2.jpg	2	6/28/2022	10:08 AM	Windsock, Plant 2 & 3 exterior
Picture 3.jpg	3	6/28/2022	10:11 AM	Ammonia Emergency PPE, South Engine Room
Picture 4.jpg	4	6/28/2022	10:12 AM	NH3 alarms outside of South Compressor Room
Picture 5.jpg	5	6/28/2022	10:12 AM	Controls with emergency stop, South Engine Room
Picture 6.jpg	6	6/28/2022	10:13 AM	Emergency washing station, South Engine Room
Picture 7.jpg	7	6/28/2022	10:15 AM	Pressure relief valves, South Engine Room
Picture 8.jpg	8	6/28/2022	10:15 AM	Ammonia alarms - 25 ppm and 2% concentration sensors, South Engine Room
Picture 9.jpg	9	6/28/2022	10:16 AM	Ventilation intake for Engine Room South system, Compressor Room
Picture 10.jpg	10	6/28/2022	10:16 AM	Ventilation exhaust, South Engine Room
Picture 11.jpg	11	6/28/2022	10:16 AM	Ammonia receiver, South Engine room
Picture 12.jpg	12	6/28/2022	10:17 AM	Pressure relief valve, South Engine Room
Picture 13.jpg	13	6/28/2022	10:17 AM	Pressure relief valve, South Engine Room
Picture 14.jpg	14	6/28/2022	10:17 AM	Tags indicating maintenance, South Engine Room
Picture 15.jpg	15	6/28/2022	10:20 AM	Door from South Engine Room to North Engine Room
Picture 16.jpg	16	6/28/2022	10:20 AM	Ammonia alarms, North Engine Room
Picture 17.jpg	17	6/28/2022	10:21 AM	Emergency washing station, North Engine Room
Picture 18.jpg	18	6/28/2022	10:22 AM	Door from North Engine Room to South Engine Room
Picture 19.jpg	19	6/28/2022	10:23 AM	Ventilation intake, North Engine Room
Picture 20.jpg	20	6/28/2022	10:25 AM	Iced over receiver, North Engine Room
Picture 21.jpg	21	6/28/2022	10:26 AM	Placard on receiver tank, North Engine Room
Picture 22.jpg	22	6/28/2022	10:27 AM	Alarms in LPR3
Picture 23.jpg	23	6/28/2022	10:27 AM	Iced over components, LPR3
Picture 24.jpg	24	6/28/2022	10:28 AM	Alarms outside of LPR3
Picture 25.jpg	25	6/28/2022	10:29 AM	LPR 3 access door, list of personnel with access unconfirmed
Picture 26.jpg	26	6/28/2022	10:29 AM	Chiller/evaporator with ice on side plates to cool products on trays, Cold Room
Picture 27.jpg	27	6/28/2022	10:30 AM	Chiller/evaporator with side plates under maintenance, Cold Room
Picture 28.jpg	28	6/28/2022	10:30 AM	Control panel with emergency stops and lockable components, Cold Room
Picture 29.jpg	29	6/28/2022	10:33 AM	Control panel wall with lockout/tagout locks, Cold Room
Picture 30.jpg	30	6/28/2022	10:34 AM	Ammonia system components behind chamber aisle and ammonia alarm, Cold Room
Picture 31.jpg	31	6/28/2022	10:34 AM	Low pressure receiver behind chamber aisle, Cold Room
Picture 32.jpg	32	6/28/2022	10:34 AM	Ammonia alarms behind chamber aisle, Cold Room
Picture 33.jpg	33	6/28/2022	10:36 AM	Hot work permit dated 6/22/22 and ammonia alarm, Cold Room
Picture 34.jpg	34	6/28/2022	10:40 AM	Lockout tagout system, Cold Room
Picture 35.jpg	35	6/28/2022	10:43 AM	Windsock, Rooftop
Picture 36.jpg	36	6/28/2022	10:43 AM	Refrigeration system vents and pipelines, Rooftop
Picture 37.jpg	37	6/28/2022	10:43 AM	Refrigeration system vents and pipelines, Rooftop
Picture 38.jpg	38	6/28/2022	10:43 AM	Refrigeration system vents and pipelines, Rooftop
Picture 39.jpg	39	6/28/2022	10:46 AM	Decommissioned condenser, Rooftop
Picture 40.jpg	40	6/28/2022	10:46 AM	Plant 2 & 3 condenser, Rooftop
Picture 41.jpg	41	6/28/2022	10:47 AM	Engine room intake, Rooftop
Picture 42.jpg	42	6/28/2022	10:47 AM	Engine room intakes, Rooftop
Picture 43.jpg	43	6/28/2022	10:47 AM	Lockout/tagout system on Rooftop, supporting maintenance workers in South Engine Room