

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

FACILITY INFORMATION:

Name: Westward Seafoods Inc.
Physical Address: Mile 1 Captain's Bay Road, Dutch Harbor, AK 99692
Phone Number: (907) 581-1660
Latitude/Longitude: 53.858611/-166.552847
EPA Facility ID# 1000 0015 2201

CONTACT INFORMATION (RMP Implementation):

Name: Ronald L. Buffinton II, Plant Engineer
Phone Number: (907) 581-1660
E-mail: ronald.buffinton@wsi.us

EMERGENCY CONTACT INFORMATION:

Name: Ronald L. Buffinton II, Plant Engineer
Phone (24-hr): (907) 359-4199
E-mail: Ronald.Buffinton@wsi.us
Website: <https://www.westwardseafoods.com/>

AUDIT DETAILS:

Contact Date: April 19, 2021
Inspectors: Terry Garcia, US EPA Region 10 SEE Grantee, Lead RMP Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: June 29, 1999
Date of Latest Update: November 27, 2018

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.)
1000091397	Refrigeration System	1000114247	31171	3	Ammonia, Anhydrous (7664-41-7)	36,000

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 ☒

If Yes, Permit Number: 433TVP01

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 their 2020 Tier II report to the SERC? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 2/28/2021

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

If Yes, Date the Tier II was submitted: On 3/1/2021 WSI provided mail receipts tracking to LEPC and Fire.

GENERAL INFORMATION:

The facility is regulated under the Risk Management Program as a Program Level 3 process and is owned and operated by Westward Seafoods, Inc. (WSI). In 2004, Western Alaska Fisheries merged with Westward to form what is now known as Westward Seafoods, Inc. The main seafood production plant built in 1989 is located on Unalaska Island in Dutch Harbor, Alaska focusing on Alaskan Pollock. There are 540 full-time employees on site and are non-union. WSI plant has two high and low (off) seasons of operation for the production of fresh and frozen seafood products. During the low season the plant performs maintenance, service, inspection, and projects. The ammonia refrigeration system consists of freezers and cold storage.

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 DOCUMENTATION SUBMITTED:

1. Process Hazard Analysis (PHA): WSI provided their September 19-21, 2011 and September 19-21, 2016 PHA Update and Revalidations Report and Tracking of Resolutions. The PHA update and revalidations were facilitated and prepared by iWork Wise with WSI plant engineers, managers and operators using the What-If/Checklist methodology. All 2011 and 2016 PHA findings were shown as complete in their tracking sheets. WSI has scheduled their next PHA update and revalidation in the Fall 2021.
2. Compliance Audit: WSI provided their August 17-19, 2015 and August 17-23, 2018 Compliance Audit Reports with Tracking of Resolutions for review. The 2015 compliance audit was facilitated by iWork Wise with WSI plant employees. All 2015 audit findings were shown as complete.

The 2018 compliance audit was facilitated by Allen Safety LLC with WSI plant engineer, Mr. Ronald Buffington participating. The 2018 Compliance was not certified in 2018 by Mr. Buffington, facility representative. The Lead engineer for Allen safety, LLC consultant confirmed (email dated July 17, 2021) that the audit was only recently signed on April 30, 2021.

All the 2018 audit findings were addressed in their report. WSI confirmed that the following findings were corrected: (1) E-stops were moved from inside of compressor room access to exterior outside room; (2) Stationary monitors and alarms were installed in employee work areas where ammonia and CO2 could directly exhaust; (3) Exhaust fans previously leading into production areas (Item # 262 updated in 2018 audit.) was redirected to exterior side and moved to the fish line from the area of exposure; and (4) Training was completed for lockout-tagout (LOTO) and plate freezer operators.

3. Training: WSI provided the training summary form and individual training records for six operators and maintenance personnel. The individual operator initial and refresher training documentation included standard operating procedure (SOP) and LOTO training. The training documentation was updated in April 2021 and June 2021.

During the 2018 audit review of the facility's training processes, initial and refresher operator training programs as well as required core competencies were evaluated. Audit Item # 90 shows that training was completed for plate freezer operators and documented.

Training for (15) Emergency Response technicians, (Level B) was delayed due to the continue health situation with the COVID pandemic in 2021. Facility has provided information that they are in lockdown with many employees still in quarantine (as of July 2021). Hazmat (40 hour) training has been scheduled with iWork Wise later this Fall if travel restrictions to the facility are lifted.

WSI uses their computerized maintenance management system (EAM) and training (Section 4) to schedule training, drills, and pre-emergency planning. iWork Wise provides all training for WSI, but was unable conduct training in 2020 due to the COVID pandemic. WSI has rescheduled the HAZWOPER training for September 2021.

AREAS OF CONCERNS:

1. The 2018 Compliance Audit certifying signature page was not certified in 2018. The audit was only recently signed and certified by WSI and Allen Safety, LLC on April 30, 2021.

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. The 2015 and 2018 Compliance Audit certifying signature page.
2. Information clarifying items in the 2018 Compliance Audit on training, LOTO and SOP updates and the mechanical integrity (MI) piping inspection program were provided and confirmation from the lead engineer, Jen Allen, of Allen Safety, LLC that the 2018 CA was only recently signed/certified on April 30, 2021.
3. HAZWOPER training documentation and Emergency Response Plan.

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:

Signature

Date

RMP Coordinator/Approval

Date

EPCRA Coordinator/Approval

Date

Land Enforcement Section Chief/Approval

Date