

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

FACILITY INFORMATION:

Name: Welchs Foods, Inc. - Grandview, WA
Physical Address: 504 Birch Ave
Phone Number: (509) 882-3112
Latitude/Longitude: 46.250333/-119.899333
EPA Facility ID# 1000 0005 2293

CONTACT INFORMATION (RMP Implementation):

Name: Mr. Tom Brooke, Plant Engineer
Phone Number: (509) 882-3112
E-mail: tbrooke@welchs.com

EMERGENCY CONTACT INFORMATION:

Name: Tom Brooke
Phone (24-hr): (509) 882-3112
E-mail: tbrooke@welchs.com
Website: www.welchs.com

AUDIT DETAILS:

Contact Date: February 4, 2021
Inspectors: Terry Garcia, US EPA Region 10 SEE Grantee, Lead RMP Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: June 18, 1999
Date of Latest Update: June 3, 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)
1000099678	Plant 1	1000124888	311411	3	Ammonia, Anhydrous (7664-41-7)	21,112
1000099679	Plant 2	1000124889	311411	3	Ammonia, Anhydrous (7664-41-7)	12,072

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: On March 23, 2020, Welch's Foods, Inc., Grandview, WA Plant 2 reported an ammonia release of approximately 2,187 pounds (NRC Report# 1274081). NRC report stated the ammonia release involved a compressor. The facility evacuated the building and reported no injuries. Welch's incident investigation stated the release was caused by a solenoid valve failure on the West 250 (Plant GV2) Sullair Compressor liquid injection system.

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: February 15, 2021 for Plant 1 and Plant 2.

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

If Yes, Date the Tier II was submitted: February 15, 2021 to LEPC Jason Clapp, Yakima County OEM and Grandview Fire, George Saenz.

GENERAL INFORMATION:

The facility is regulated under the Risk Management Program as a Program Level 3 process and is owned and operated by Welch's Foods, Inc. (Welch's). Welch's is a membership cooperative marketing association representing fruit growers. The Welch's facility consists of the following two fruit juice processing plants: (1) Plant #1 on Birch Street, Grandview, WA; and (2) Plant #2 on Grandridge Road, Grandview, WA, Yakima Valley. The facility produces concentrated fruit juices and by-products. The Welch's facility consists of two machine rooms and associated vessels providing refrigeration for a grape juice processing and cold storage. The machine rooms, Grandview 1 and 2 (GV1 and GV2), operate independently. Processing equipment generally includes process chillers and swept-surface heat exchangers (SSHX). Both plants support a number of juice tank storage rooms (Tank Rooms) which consist of a number of tanks in a room cooled by one or more air-cooling evaporators (Reference Process Description 2019 PHA Revalidation pg. 6/59). There are 45 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 DOCUMENTATION SUBMITTED:

1. **Process Hazard Analysis (PHA):** Welch's provided their 2013 and 2019 PHA Revalidations for review. The December 13, 2013 PHA Revalidation was conducted by Endeavor EHS LLC and Welch's technical and operations staff using the What/If methodology. All recommendations were completed for the 2013 PHA.

The January 25, 2019 PHA Revalidation was conducted by Endeavor EHS LLC and Welch's technical and operations staff using the What/If methodology. The PHA addressed the following modes of operation such as continuous normal operations, startup, shutdown, emergency situations, charging, and pump-out including training, maintenance, and service activities. The 2019 PHA identified fifteen findings and recommendations. Seven (7) recommendations have been completed and eight (8) recommendations are scheduled to be completed by June 2021.

2. **Compliance Audit:** Welch's provided their March 27, 2017 and July 14, 2020 Compliance Audit reports for review. Both audits were conducted by Endeavour EHS, LLC and Welch's team members. The following 2017 audit findings were repeated in the 2020 Compliance Audit report: (1) hot work program (three) and (2) not following-up on completed Bulletin 109 inspections on process equipment for mechanical integrity. The 2020 PSM/RMP Compliance Audit Action Item Status Tracking document identified 17 findings. Fifteen findings have been resolved and two findings are scheduled to be completed by September 2021. Welch's has added the Hot Work module in their Alchemy system to train their employees during the summer of 2021.
3. **Training:** Welch's provided a completed Training Summary signed by Tom Brooke, Plant Engineer, on their five operators, including an Ammonia Refrigeration Training Log. One operator, Ken Goss, is shown having a grandfather tenure with the facility since 1999. Welch's lead B&R operator has a RETA CIRO-certification. Welch's uses an outside contractor to provide ammonia refrigeration training on a three-year basis. The last refresher training session for their operators was completed in 2019 by Doubl-Kold. All refrigeration employees participate in annual ammonia safety training. Maintenance training has been documented and current.

AREAS OF CONCERNS:

1. **Mechanical Integrity (MI):** The 2020 Compliance Audit report identified the following issues with their mechanical integrity program: (1) no follow-up on the completed Bulletin 109 inspections on equipment to correct any items; (2) not performing vibration analysis on their compressors, even though the plant manager states the annual run-time is low; and (3) no inspection and testing being performed on equipment that requires repair such as failing insulation and potential corrosion under insulation for the G1V tank room and associated piping.

The January 2017 MI Inspection Audit report has 77 findings remaining open that need to be resolved. MI findings Photo#48 to 50 and 172, identify valves requiring repair due to corrosion for Chiller #6 and Tank Room 5 with no proposed completion date. There are sixteen (16) MI findings (i.e. Photo #82 to #84, #87, #88, etc.) identifying repair of damaged piping insulation for equipment such as Chiller #8 and #9, Freezer and Accumulator Recirculator with no proposed completion date.

2. **Compliance Audits:** The owner or operator shall promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected as required by 40 C.F.R. § (d). The 2020 audit repeated the following 2017 Compliance Audit findings: (1) hot work program (three) and (2) not following-up on completed Bulletin 109 inspections on process equipment for mechanical integrity.

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. Documentation that substantiates the five process operators listed on the Training Summary (attached) have received hands-on demonstrated skills training in the refrigeration operations (SOPs) and maintenance on the two machine rooms GV1 and GV2.
2. Initial training for employees involved in operating a process prior to 1999, or written certification that they have the required knowledge, skills, and abilities.
3. RETA training certificates (CIRO or otherwise certified) for operators.
4. Name of Contractor who completed the 2017 MI Audit report including a copy of the findings and resolutions tracking document.
5. Provide Ammonia Refrigeration contractor employees trained in the work practices at the site.
6. 2019 Refresher training documentation for operators.
7. Updated 2017 MI Audit findings and resolutions tracking document with proposed and actual completions dates.

Welch's provided the follow-up documentation on March 1 and April 1, 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:

Signature

Date

RMP Coordinator/Approval

Date

EPCRA Coordinator/Approval

Date

Land Enforcement Section Chief/Approval

Date