



REGION 10
SEATTLE, WA 98101

Clean Air Act - Risk Management Program – Section 112(r)
Emergency Planning Community Right-to-Know Act – Sections 302, 311 and 312
On-site Compliance Inspection Report
Cascade Columbia Distribution
14200 SW Sherwood-Tualatin Road, Sherwood, OR

PURPOSE

The purpose of this On-site Compliance Inspection was to determine compliance with the Clean Air Act Section 112(r) Risk Management Program and the Emergency Planning and Community Right to Know Act Sections 302, 311, and 312.

CAA Section 112(r) requires facilities that hold chemicals over threshold quantities to have a Risk Management Program. EPCRA Section 311 requires facilities that hold chemicals above the reporting threshold to submit copies of the SDSs or a list of these chemicals to the State Emergency Response Commission, the Local Emergency Planning Committee, and the local fire department. EPCRA Section 312 requires the Annual Chemical Inventory Reports (Tier II) for the current calendar year to be submitted by March 1 of the following year. The Tier II is required to be submitted to the SERC, LEPC, and fire department. EPCRA Section 302 requires any facility that has any EHS above the threshold planning quantities to notify the SERC and LEPC. LEPCs should also include the EHS(s) in their emergency response plans. Facilities covered under EPCRA Section 312 are required to indicate on the Tier II if they are subject to EPCRA Section 302 emergency planning requirements.

COMPANY INFORMATION

Name: Cascade Columbia Distribution
Mailing Address: 14200 S.W. Tualatin-Sherwood Rd.
Sherwood, OR 97140
Website: cascadecolumbia.com

FACILITY INFORMATION

Name: Cascade Columbia Distribution
Facility Address: 14200 S.W. Tualatin-Sherwood Rd.
Sherwood, OR 97140
Latitude/Longitude: 45.3365449, -122.824102
RMP Facility ID#: 1000 0016 2968
EPCRA Tier II ID#: 22175
FRS ID#: 110056966877
EJ Concerns: Yes (95%)

CONTACT INFORMATION (RMP Implementation)

Name: Steve Durrell
Title: Manager
Phone Number: 503-625-5293
E-mail: steved@cascadecolumbia.com

EMERGENCY CONTACT INFORMATION

Name: Steve Durrell
Title: Manager
Phone Number: 503-849--8645
E-mail: steved@cascadecolumbia.com

INSPECTION DETAILS

Inspection Date: March 13, 2024
Inspection Time: 0900 hours – 1055 hours
Inspectors: Terry Garcia, US EPA R10, SEE Grantee, Lead RMP/EPCRA Inspector
Edward Johannes, US EPA R10, SEE Grantee, RMP/EPCRA Inspector
Peter Phillips, US EPA R10, SEE Grantee, Lead RMP/EPCRA Inspector
Mhara Coffman, US EPA R10, RMP/EPCRA Inspector
Thomas Vroman, CIH, Weston Solutions, Inc., EPA START Contractor

On February 29, 2024, EPA emailed a Notice of Inspection Letter to the facility informing them of a planned RMP and EPCRA inspection. The letter included 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. A copy of the letter must be provided to the employee representatives and the letter posted in a manner accessible to employees in the facility.

- Is the facility unionized? Yes ☐ No ☒
If yes, name of union:
- Was an employee representative present during the inspection? Yes ☐ No ☒
If yes, name/title:

GENERAL INFORMATION

The facility is regulated under the Risk Management Program as a Program Level 2 facility and is owned and operated by Cascade Columbia Distribution (Cascade Columbia). There are 42 full-time employees on site.

Cascade Columbia Distribution is a chemical logistics, delivery, and warehousing company. The company distributes more than 400 types of chemicals, mostly inorganics including acids and bases. The RMP-covered process includes Cascade Columbia accepting shipment of drums containing 70% Hydrofluoric Acid (HF) from trucks at the loading dock. These drums are transported by forklift to the production area of the facility. At the production area, the 70% HF drums are pumped into an above-ground storage tank, where it is mixed with the existing stock of HF and diluted to 49% HF, where it is no longer covered by the RMP regulations. There have been no recent changes or process modifications.

DATE AND PROGRAM LEVELS OF SUBMITTED RMP

Initial Submission Date: October 19, 1999

Date of Latest Update: October 14, 2019

- Has the facility has been inspected in the past 5 years? Yes ☐ No ☒
If yes, date of last inspection:
- Is the facility High Risk? Yes ☒ No ☐

Process (as reported in the RMP)

Process ID	Description	Process Chemical ID	NAICS Code	Program Level	Chemical Name CAS Number	Quantity (lbs.)
1000103534	Hydrofluoric Handling	1001293613	325998	2	Hydrogen Fluoride/Hydrofluoric Acid 7664-39-3	100,000

CAA TITLE V AIR PERMIT

- Does the facility have a CAA Title V Permit? Yes ☐ No ☒
If yes, permit number:

EMERGENCY RELEASE / ACCIDENT HISTORY

- Did an RMP reportable release occur in the past 5 years? Yes ☐ No ☒
- Did a CERCLA/EPCRA reportable release occur in the past 5 years? Yes ☐ No ☒
If either yes, date and description of release:

EPCRA 312 – TIER II REPORT

- Was the 2023 Tier II report submitted to the SERC? Yes ☒ No ☐
If yes, date Tier II was submitted: 3/1/2024
If no, calendar year of the most recent Tier II:
- Was the 2023 Tier II submitted to the LEPC/fire department? Yes ☒ No ☐
If yes, date Tier II was submitted: 3/1/2024
- Is the facility subject to EPCRA Section 302? Yes ☒ No ☐
If yes, is it correctly checked on the Tier II? Yes ☒ No ☐
- Is the subject to RMP correctly checked on the Tier II? Yes ☒ No ☐
- Is RMP facility ID correct on the Tier II? Yes ☒ No ☐

EPCRA CHEMICALS OVER THRESHOLD

According to the most recent Tier II, the facility stores the following hazardous chemicals over the reporting threshold. See the attached Tier II, inventory amounts.

Chemical Name	EHS (Yes or No)	CAS Number
HYDROGEN FLUORIDE	Y	None provided
TOLUENE	N	108-88-3
SULFURIC ACID	Y	7664-93-9

EPCRA 311 – SDSs

See Attached Tier II and chemical information on each EHS stored over the reporting threshold at the Facility.

EPCRA 302 – LEPC Coordination

Noted at the time of inspection, that with the exception of COVID years, the facility has coordinated with LEPC since 2018 as required.

LEPC

Agency: Tualatin Valley F&R
Program Contact: Oregon Fire Marshal
Address: 11945 SW 70th Ave, Portland, OR 97223
Tigard, OR
Phone Number: 503-649-8577
Email: <https://www.tvfr.com/129/Fire-Marshals-Office>
Website: <https://www.tvfr.com/129/Fire-Marshals-Office>

INSPECTION ENTRY

Terry Garcia led the inspection entry. The inspection team met with Steve Durrell at the Cascade Columbia Distribution facility in Sherwood, Oregon. The team arrived at the facility at 9:00 a.m. and was joined by the following facility personnel:

Name	Title
Steve Durrell	General Manager
Carlos Romero	Regulatory Director
Eric Lonborg	Asst. Operations Manager
Amy Potter	Attorney; Angeli Law Group LLC
Anne Sturgill	Investigator

- Were any SERC, LEPC, or fire department representatives present? Yes ☒ No ☐
If yes, names and titles of representatives: John Wheeler, Emergency Manager Washington County, OR and Travis Lindberg, Emergency Manager, Sherwood, OR
- Is the facility a first responder? Yes ☐ No ☒
If no, the responding agency: Tualatin Valley Fire and Rescue

The inspection team was escorted to a conference room. Introductions were made by Terry Garcia, who provided a summary of the risk management program and explained the purpose of the visit. Each team member presented their credentials.

EPA requested an explanation of the facility's operations and any additional safety measures that should be taken during the site tour. The facility is a warehouse, storing chemicals for distribution to clients. The EPA was instructed that the required PPE included safety glasses and closed-toe shoes.

FACILITY TOUR / ON-SITE OBSERVATIONS

The facility tour was conducted from approximately 0930 hours to 1000 hours. Steve Durrell, Carlos Romero, Eric Lonborg, Amy Potter, and Anne Sturgill escorted the inspection team. The inspection team observed the Loading Dock, drainage systems adjacent to Loc 600, the Acid Shed, Production Area, Caustic Shed, Flammable Shed, Oxidizer Shed, and Stormwater Pond.

The RMP-covered process includes Cascade Columbia accepting shipment of drums containing 70% Hydrofluoric Acid (HF) from trucks at the Loading Dock. Safety systems observed include the use of chocks for delivery trucks (Photo 1), and a T-bar allowing drainage systems to shut off drainage valves in support of spill containment (Photos 3 & 4). Three above-ground storage tanks adjacent to the Loading Dock store propylene glycol (Photo 2) are regulated under EPCRA and are not RMP-regulated). EPA observed 70% HF stored in the Acid Shed (Photos 5-8); EPA observed several safety measures in place at the Acid Shed including wheel chocks, a sub-grade catch basin for spill containment, and a T-bar tool for valve shutoff. EPA inspected the Production Area where 70% HF is pumped from drums to above-ground storage tanks for the dilution process and observed hoses, piping, valves, and tanks (Photos 9-14). Safety measures observed in the Production Area included emergency stops, safety shower and eyewash.

EPCRA-covered chemicals stored on-site include acids, caustics, flammables, and oxidizers. The facility separates the chemicals according to hazard class and stores them in congruently named sheds. EPA observed EPCRA-regulated chemicals in the Caustic Shed (Photos 15 & 16), Acid Shed (Photo 16), Oxidizer Shed (Photo 17), and Flammable Shed (Photo 17). Safety measures observed in place included hazcom signage and placarding and proper spacing and management of containers. A fire alarm and fire extinguisher were observed in the shed area (Photo 17).

EPA inspected the Stormwater Pond at the Western area of the facility property and observed the pond to be functional.

Photographs were taken of the chemical distribution and handling process. The photographs are included in Attachment A.

After touring the RMP-covered process areas and the EPCRA chemical storage areas, the inspection team returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to Steve Durrell, Carlos Romero, Eric Lonborg, Amy Potter, and Anne Sturgill.

INFORMATION COLLECTED FROM FACILITY

1. Training Verification Record
2. Training for RMP Maintenance Elements Record
3. Pressure Testing for Hose and Fittings Leak Detection
4. Block Flow Diagram 70% HF
5. Facility Site Map (photo)
6. RMP Site Map (rendered sketch)
7. Maintenance Schedule for HF 70% Service
8. Equipment Maintenance Log

AREAS OF CONCERNS

The following is a list of areas of concern identified:

1. **Prevention Program: Training [68.54(a)]:** Cascade Columbia's training documentation did not include verification of training by both employee and manager. The operators are Steve Durrell, Forrest Hesedahl, Matt Keinonen, Erik Lonborg, Francisco Elder, Ed Hawthorne, Roger Lopez, Cameron Mingear, Daniel Parent, and Rudy Lacaden (Hire date: 1-3-2024; Maintenance Operator). On May 17, 2024, Cascade Columbia provided revised training documentation with verification by training manager to ensure future training is documented.
2. **Maintenance [68.56(a)]:** Cascade Columbia was unable to provide documentation that showed they prepare and implement procedures to maintain the on-going mechanical integrity of the process equipment. On May 17, 2024 Cascade Columbia provided revised site-specific maintenance procedures and documentation to maintain the on-going mechanical integrity of the regulated process equipment

ON-SITE INSPECTION REPORT CERTIFICATION

This is to certify that I, Terry Garcia, as the Lead Inspector for the On-site Compliance Inspection, have verified the accuracy of the information in this report.

Terry Garcia

Digitally signed by Terry Garcia
Date: 2024.07.22 09:37:43 -07'00'

Inspector Signature

JAVIER MORALES

Digitally signed by JAVIER MORALES
Date: 2024.07.22 09:58:06 -07'00'

RMP Coordinator Signature

ERIN WILLIAMS

Digitally signed by ERIN WILLIAMS
Date: 2024.07.26 10:58:13 -07'00'

EPCRA Coordinator Signature

MATTHEW QUARTERMAN

Digitally signed by MATTHEW
QUARTERMAN
Date: 2024.07.26 12:26:30 -07'00'

Land Enforcement Section Chief Signature

ATTACHMENTS

- A. Photographs (Photo Log and Layout)
- B. Safety Data Sheets
- C. Tier II Report

Attachment A – Photo Log

Site Name: Cascade Columbia Distribution

City, State: Sherwood, Oregon

Photographer: Tom Vroman, Weston Solutions

File	Photo Layout ID	Date	Time	Description
Photo1.jpg	1	3/13/2024	9:35 AM	Location: Loading Dock Chocks are put under wheels, drain for any spills during loading or unloading of trucks, a T-bar is along the dock wall to shut off catch basin valves in case of spill
Photo2.jpg	2	3/13/2024	9:36 AM	Location: Adjacent to Loading Dock Three large blue above-ground storage tanks storing propylene glycol [Not RMP]
Photo3.jpg	3	3/13/2024	9:38 AM	Location: South of Loc 600 Drain with a nearby T-bar to shut off the valve
Photo4.jpg	4	3/13/2024	9:38 AM	Location: South of Loc 600 Detail of drain valve
Photo5.jpg	5	3/13/2024	9:39 AM	Location: Acid shed Storage of acids, floor of shed is sloped inward to limit spread of spill
Photo6.jpg	6	3/13/2024	9:39 AM	Location: Acid Shed Storage of 70% hydrofluoric acid
Photo7.jpg	7	3/13/2024	9:40 AM	Location: Acid Shed NFPA placard on acid shed
Photo8.jpg	8	3/13/2024	9:40 AM	Location: Acid Shed Storage of acids in drums and on shelves
Photo9.jpg	9	3/13/2024	9:43 AM	Location: Production Area Emergency shower located approximately 10 feet from HF pump area

Photo10.jpg	10	3/13/2024	9:43 AM	Location: Production Area Hoses and valves used in the 70% HF pumping process
Photo11.jpg	11	3/13/2024	9:43 AM	Location: Production Area Detail of valve used in 70% HF pump process
Photo12.jpg	12	3/13/2024	9:43 AM	Location: Production Area Hose used in 70% HF pump process
Photo13.jpg	13	3/13/2024	9:44 AM	Location: Production Area Plastic piping from valves to white above-ground storage tank. Pipes transport 70% HF to the above-ground storage tank
Photo14.jpg	14	3/13/2024	9:44 AM	Location: Production Area Plastic piping to transport 70% HF to the above-ground storage tank
Photo15.jpg	15	3/13/2024	9:48 AM	Location: Caustic Shed Storage of caustic chemicals
Photo16.jpg	16	3/13/2024	9:53 AM	Location: Acid and Caustic Sheds Signage for stored chemicals
Photo17.jpg	17	3/13/2024	9:52 AM	Location: Oxidation and Flammable Sheds; Fire alarm and extinguisher Signage for stored chemicals
Photo18.jpg	18	3/13/2024	9:50 AM	Location: Facility Exterior, Western Edge of Property Stormwater pond at the western edge of the property