U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION 1 – NEW ENGLAND

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BOSTON, MASSACHUSETTS 02109-3912

CAA 112 (r), Risk Management Plan (RMP), CAA § 112(r)(1) General Duty Clause (GDC), CERCLA § 103, and EPCRA §§ 302-313 Compliance Evaluation Inspection of:

United Natural Foods, Inc.
90 Technology Drive
Brattleboro, VT 05301

7/26/2024

Date of Inspection

Waste and Chemical Compliance Section

7/26/2024

Date Inspection Report Approved

O'Donnell, Mary Jane

Digitally signed by O'Donnell, Mary Jane
Date: 2024.07.26 13:56:12 -04'00'

Mary Jane O'Donnell, Manager

Waste and Chemical Compliance Section

7/26/2024

Date Inspection Report Finalized

7/26/2024

Date Inspection Report Transmitted to Facility

Disclaimer: Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

Date: July 26, 2024

From: Aaron Gilbert, Leonard Wallace IV and Andrew Meyer, U.S. EPA Inspectors

Through: Mary Jane O'Donnell, Chief

Waste and Chemical Compliance Section

To: File

Subject: Chemical Accident Investigation and Inspection, Clean Air Act (CAA) Risk Management Plan (RMP) Section 112(r)(1) General Duty Clause and Emergency Planning and Community Right-To-Know Act (EPCRA) Sections 302-312, and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 103 of United Natural Foods Inc. in Brattleboro, Vermont.

I. GENERAL INFORMATION

Facility Name:	United Natural Foods Inc.
Dun and Bradstreet Number:	11-814-4529
RMP Number:	NA; General Duty Clause (GDC) Facility
Address:	90 Technology Drive Brattleboro, VT, 05301
Inspector Names:	Leonard B. Wallace, IV, U.S. Environmental Protection Agency (U.S. EPA) Region 1 Andrew Meyer, U.S. EPA Region 1 Aaron Gilbert, U.S. EPA Region 1 Mark Briggs, Eastern Research Group, Inc. (ERG)
Inspection Date:	June 12, 2024
Type of Inspection:	CAA § 112(r)(1), CERCLA § 103, and EPCRA §§ 302-313 Compliance Evaluation Inspection
Purpose of Inspection:	This inspection was conducted as a routine EPA CAA § 112(r)(1) General Duty Clause/EPCRA compliance evaluation inspection. United Natural Foods Inc in Brattleboro, Vermont (VT) was selected for inspection because of an ammonia release on August 21, 2023, it is a stationary source having an anhydrous ammonia refrigeration system onsite.
Current Owner:	United Natural Foods Inc.
Current Operator:	United Natural Foods Inc.
Primary NAICS codes:	424410 (General Line Grocery Merchant Wholesalers)
Number of full-time employees (FTEs):	4

Estimated Annual Sales: Site unknown, $ 26,514,267,000 (Manta) (Parent)

Parent Corporation: United Natural Foods Inc.

II. GENERAL FACILITY DESCRIPTION

United Natural Foods Inc. in Brattleboro, VT (UNFI or the Facility) provide cold storage warehousing prior to product distribution to groceries in the New England market. Primary other food stores. The Facility consists of approximately 137,000 square feet of frozen storage warehousing and loading dock space located in a commercial/industrial park. The Facility has 4 full-time employees and operates Monday through Friday, from 8 am to 2 pm. One person is on site 8 pm-2 am but no operations are conducted during this shift. There is no labor union at the facility.

The Facility has one employee on-site who monitors the ammonia refrigeration system which is operated by Innovative Refrigeration Systems Inc., 373 Mt. Torrey Road, Lyndhurst, VA 22952. The company staff stated that the operating conditions of the ammonia system can be monitored remotely by UNFI staff and that it would take approximately 30-minutes for someone to be at the site during non-operating hours. The ammonia refrigeration system was designed and installed in 2000 and includes an ammonia machinery room (AMR) housing three compressors, the high-pressure receiver (HPR), thermosyphon receiver, medium and low temperature accumulators, associated oil pots, and the water treatment system for the condenser. The ammonia condenser and associated ammonia piping is located on the roof and ammonia evaporators are suspended from the ceilings of the frozen food storage warehouses. The system reportedly contains 6,000 pounds of anhydrous ammonia according to the Facility's reporting year (RY) 2022 EPCRA Tier II report. The facility is heated with propane from buried propane tanks and a propane vaporizer located on the east side of the property. The propane tanks are owned and operated by an outside vendor who supplies propane to all buildings in the commercial/industrial park.

The Facility is located approximately 1.6 miles north of downtown Brattleboro. Commercial businesses are less than 0.2 miles from the Facility and residential neighborhoods are located approximately 0.3 miles to the southeast of the Facility. Attachment 1 includes a GoogleEarth® aerial photograph of the UNFI facility located in Brattleboro, VT.

III. IN-BRIEF/OPENING CONFERENCE

The U.S. EPA inspection team including Leonard Wallace, IV, Andrew Meyer, Aaron Gilbert and Mark Briggs (U.S. EPA contractor inspector) entered the Facility at approximately 9:00 AM EST. The U.S. EPA inspection team was supported the Vermont State Hazmat Lt. Benjamin Priggen and Leonard Howard III, Brattleboro Fire Chief.

The U.S. EPA inspection team presented identification to Ms. Nicole McClure, UNFI Environmental Manager for UNFI's Brattleboro, VT facility and Inspector Wallace subsequently conducted the In-Brief/Opening Conference, explaining the reason and scope of the inspection. Inspector Wallace presented the EPCRA Notice of Inspection form to Ms. McClure, who signed as the Recipient of the Notice. Ms. McClure did not attempt to deny entry to the Facility to the U.S. EPA inspection team and did not invoke any claims of Confidential Business Information (CBI) for the purposes of the inspection. The Facility Representatives listed in **Table 1** participated in the on-site inspection:

Table 1. Facility Representatives:

Name	Title/Company	Phone Number	E-mail
Nicole McClure	Environmental Manager	(947) 948-2249	Nicole.mcclure@unfi.com

Travis Lighty	Regional Facility Manager	(717) 870-2684	tlighty@unif.com
Rusty LaClair	Facility Manager	(603) 903-2488	rlaclair@unfi.com
Eric Overhulser	Senior Manager Facilities	(253) 273-2007	eoverhulser@unfi.com
David Richards	Environmental, Health and Safety	(860) 214-3630	David.richards@unfi.com

Inspector Wallace shared the following guidance documents with Facility representatives during the In-Brief/Opening Conference:

1. Guide to the Emergency Planning and Community Right-to-Know Act (Fall 2020)
2. EPCRA Quick Reference Fact Sheet (Fall 2020)
3. Small Business Resource Information Sheet (February 2020, EPA-300-F-20-002)
4. National Response Center Oil and Chemical Spill Reporting flyer
5. CAMEO Chemicals software. Explained the mobile app and the desktop program formats can be used offline, and the desktop program can share information with other CAMEO suite programs.

Inspector Wallace stated that after the opening meeting, the inspectors would do a walk-through inspection of the outdoor chemical storage area, the manufacturing processes where chemicals are used, and all indoor areas where chemicals are stored. Inspector Wallace stated the inspection team would be taking photographs of items and areas of interest and a copy of all photographs taken would be made available to the Facility representatives after the inspection.

IV. PHYSICAL INSPECTION

The U.S. EPA inspection team conducted a walk-through of the following areas at the Facility:

1. Loading Docks
2. Warehouse Freezers
3. Building Exterior
4. Ammonia Machinery Room (AMR)
5. Roof Areas

Inspector Wallace took a total of 180 digital photographs during the inspection to provide reference documentation of conditions observed. The photographs are referenced throughout the document. While on-site, EPA also inspected and took photographs of the propane underground storage tank (UST) and propane vaporizer system that is owned and operated by the property management company for use by tenants, including UNFI, within the commercial/industrial park. Observations regarding the propane storage tank and propane vaporizer are included in a separate report and are not the responsibility of UNFI. The following include areas of concern (AOCs) identified in each of the areas during the physical inspection of UNFI.

Loading Docks

The UNFI loading dock encompasses approximately 10 overhead bay doors used for loading trucks as well as an office area and charging station for lift trucks, overhead equipment, and floor scrubbing equipment. Approximately one-half of the loading docks are refrigerated by a freon system while the other half of the loading docks are maintained at ambient temperatures. In the refrigerated section of the loading dock, freon evaporators are located near the ceiling to maintain low temperatures in the space when moving frozen products from the warehouse to the truck trailers. An inspection of the loading dock area resulted in the following AOCs:

- All entrances into the building do not have National Fire Protection Association (NFPA) diamonds to indicate the hazards of the chemicals located inside.

- The blue-colored audible/visual ammonia alarm located in the loading dock area is not labeled regarding its function (see photograph P1150654).

- Hydrogen detectors, ventilation system, or audible/visual ammonia alarms are not present in the lift truck battery charging area (see photographs P1150655, P1150656 and P1150657).

- Elevated carbon monoxide (CO) concentrations, as high as 9 parts per million (ppm), were detected in the forklift recharging area. These readings are believed to be attributed to sensor cross reactivity with hydrogen gas that is generated during battery recharging (see photograph P1150661).

- There is no emergency safety shower or eyewash station present in the lift truck charging area. They only had a portable eye wash station (see photograph P1150657).

- There is a 55-gallon drum of a cleaning liquid that is not labeled and is not in secondary containment in the Loading Docks area. This product was not reported on the EPCRA Tier II form (see photographs P1150659 and P1150660).

- Evaporators in the loading dock/charging area are were identified as not currently not being used. The evaporators do not have lock out/tag out tags and did not have valve lockout devices on them to indicate they are not in service (see photographs P1150649, P1150650, P1150651, P1150652, and P1150658).

- Evaporators in the loading dock area which are suspended from the ceiling are not protected from potential impact from lift truck traffic (see photographs P1150651 and P1150662).

Warehouse Freezers

UNFI has two 0°F warehouse freezers, labeled A and B, that include storage racks and ammonia evaporators suspended from the ceiling to maintain the target temperature. During the inspection, Freezer B was not in operation due to a lack of products currently entering the facility. An inspection of the warehouse freezers resulted in the following AOCs:

- The blue audible/visual ammonia alarms which in Freezers A and B are not labeled regarding their function (see photographs P1150676, P1150678, and P1150694).

- Evaporators that are suspended from the ceiling in Freezer A and Freezer B are not protected from potential impact from lift truck traffic (see photographs P1150666, P1150669, P1150683, P1150695, P1150696, P1150697 and P1150698).

- Wood pallets are stacked on shelving in Freezer B creating a fire hazard (see photograph P1150667).

- Lead-acid batteries are being stored in Freezer B. The batteries are not labeled as Universal Waste and are not stored within secondary containment (see photographs P1150670 and P1150672).

- The entry doors into Freezers A and B do not have NFPA diamonds or signage indicating the presence of ammonia (see photographs P1150681 and P1150682).

- The location of the fire extinguisher in Freezer B is not provided with signage to indicate its location (see photograph P1150685).

- The floor drain in Freezer B is not plugged to prevent a release of chemicals, including ammonia, from reaching the sanitary sewer (see photograph P1150669).

- Ceiling evaporators in Freezer B that are not in use have not been locked out and tagged out with appropriate signage and did not have valve lockout devices on them (see photograph P1150669).

- Ammonia piping associated with the evaporators in Freezers A and B is not labeled to indicate the contents and direction of flow (see photographs P1150669, P1150683, P1150697 and P1150698).

- Exits from the Freezers A and B are not clearly marked (see photographs P1150684 and P1150702).

- Ammonia audible/visual alarms are not present outside Freezers A or B (see photographs P1150691 and P1150692). The main fire alarm control panel is in the storage room. There is no ammonia detector read out or ammonia audio/visual alarm in the storage room (see photographs P1150707 and P1150708).

- The exit doors in the Freezers A and B are not correctly identified based on the Evacuation Plan provided during the inspection. For example, photograph P1150684 shows a door in Freezer B not marked as an exit with ice build-up around the frame but the Evacuation Plan indicates this is an emergency exit door. Photograph P1150699 shows a door clearly marked as not an emergency exit, but the Evacuation Plan indicates this door is an emergency exit.

- There was a second Fire Alarm Control Panel observed in an emergency exit stairwell (see photograph P1150709).

- The static vent tubes beneath the floor of the freezers recirculate air from the facility to prevent the concrete from freezing (see photograph P1150704). The vent tubes discharge into the storage room. If an ammonia release occurs in either Freezer A or B, ammonia vapors could enter the static vent tubes and be discharged into the storage room. However, according to the Evacuation Plan, employees are told to shelter-in-place if an ammonia release occurs.

Building Exterior

The Facility building exterior includes a parking area and truck loading/unloading docks located in the front. An electrical transformer and electrical generator are located along the south side of the building near the employee entrance and the staircase leading to the AMR. An inspection of the building exterior resulted in the following AOCs:

- The electrical transformer is not labeled to indicate if Polychlorinated Biphenyls (PCBs) are present in transformer oils (see photographs P1150736, P1150737, and P1150738).

- The facility had only one windsock which was not visible from all exits (see photograph P1150829).

- Propane piping adjacent to the building is not labeled regarding its contents or direction of flow (see photographs P1150739 and P1150742).

- The electrical transformer is not protected from potential vehicular impacts (see photographs P1150737 and P1150738).

- Propane piping entering the emergency electrical generator is not protected from impacts (see photograph P115070).

Ammonia Machinery Room

A single AMR is located on the second floor of the building and is accessible from a staircase along the exterior of the building and through an access door in a hallway inside the building. The AMR has glass windows to provide natural lighting as well as exit doors leading to the boiler room and the refrigeration equipment on the roof. An inspection of the AMR resulted in the following AOCs:

- The blue audible/visual ammonia alarm outside the primary door of the ammonia machinery room (AMR) is not labeled regarding its function (see photographs P1150743 and P1150744).

- The facility is using different styles and colors of ammonia audiovisual devices (see photographs P1150654, P1150747, P1150796, P1150797, and P1150800).

- The NFPA diamond on the entry door to the AMR is not the correct size (see photograph P1150745).

- No emergency shower/eyewash is located outside door of the AMR (see photographs P1150741 and P1150742).

- The emergency stop (E-stop) and emergency ventilation start switch is located inside the AMR rather than outside the primary entry door (see photographs P1150745, P1150747 and P1150748).

- There is another audible/visual ammonia alarm inside the outside door in the AMR with three colors: White marked Ammonia +10,000 ppm, Blue marked Ammonia 25 ppm, and Orange marked 10 ppm (see photographs P1150747 and P1150748).

- No piping and instrumentation diagrams (P&IDs) showing critical valves to be used in an emergency and emergency shut down procedures are posted outside the AMR primary entry door (see photographs P1150743, P1150745, P1150795, and P1150798).

- The emergency contacts list is not posted outside the AMR primary entry door (see photographs P1150743, P1150745, P1150795, and P1150798).

- No signage is posted outside or inside the AMR showing who installed the system, the two pressure tests before filling the system, the coolant type and amount, and the oil type and amount in the refrigeration system.

- State of Vermont pressure vessel inspection certificates posted on the wall of the AMR expired in 2018 (see photographs P1150751 and P1150793).

- Some work clothing is being stored in the AMR (see photographs P1150747 and P1150748).

- Supplies and materials not properly being stored inside the AMR (see photographs P1150750 and P1150752).

- Glass windows are present across the entire wall of the AMR. They are not marked for 1-hour fire resistance and/or explosion resistance (see photographs P1150753, P1150755 and P1150757).

- The King Valve above the High Pressure Receiver (HPR) cannot be accessed from floor level (see photograph P1150758).

- Piping protruding from the bottom of the HPR level indicator is not provided with adequate piping supports nor is it protected from potential impacts (see photographs P1150759 and P1150760).

- The HPR may not be properly anchored to the floor (see photographs P1150760, P1150763 and P1150764).

- Damaged insulation and vapor barrier is present on the Low Temperature Transfer Drum in the AMR (see photographs P1150773, P1150774 and P1150777).

- A small ammonia-containing pressure vessel inside the AMR is not labeled regarding its function (see photograph P1150780).

- Surface corrosion is present on unpainted piping inside the AMR (see photographs P1150779 and P1150780).

- Two exit doors from the AMR are not equipped with panic hardware (see photographs P1150781and P1150782).

- An exit door from the AMR into the boiler room is not tight fitting at the bottom (see photographs P1150781 and P1150784).

- The exit door from the boiler room into the AMR was not properly labeled to warn someone they would be entering the AMR and audible/visual ammonia alarm was in the room (see photographs P1150783 and P1150784).

- There was a duct vent from the roof into the AMR discharges above the near the ceiling level (see photographs P1150770 and P1150800).

- The secondary entrance into the AMR does not have an NFPA diamond to indicate the presence of potential hazards (see photograph P1150794).

- There were two audible/visual ammonia alarms inside the AMR both colored blue, but not labeled to indicate their function (see photograph P1150754and P1150800).

- There is another audible/visual ammonia alarm outside the door of the AMR that led to the second-floor hallway with three colors: White marked Ammonia +10,000 ppm, Blue marked Ammonia 25 ppm, and Orange marked 10 ppm (see photographs P1150792, P1150794, P1150795, and P1150796).

- Second floor door inside to the AMR did not have NFPA diamond to indicate the presence on ammonia (see photograph P1150794).

- There was no emergency shower/eyewash outside door of the AMR on the second floor (see photographs P1150792, P1150794, P1150795, and P1150796).

- There was door from this area the lead to the second-floor hall. This door was equipped with a blue audible/visual ammonia alarm that was not labeled to its function (see photograph P1150797).

Roof Areas

Equipment on the roof of UNFI includes an ammonia condenser and ammonia piping as well as the freon refrigeration equipment and other building HVAC equipment. An inspection of the refrigeration equipment on the roof resulted in the following AOCs:

- Ammonia piping on the roof is not adequately labeled to indicate its contents or direction of flow (see photograph P1150806).

- The pressure relief valve (PRV) discharge header on the roof is capped and would discharge ammonia downward rather than upward if a release were to occur (see photograph P1150809).

- The ambient air discharge from the AMR on the roof is directed downward rather than upward (see photograph P1150810).

- The ambient air intake into the AMR from the roof is within 15-feet of the ambient air discharge from the AMR and the discharge from the PRV header (see photographs P1150810 and P1150811).

- The PRV discharge height is less than 7.5-feet above the nearby condenser (see photographs P1150811 and P1150813).

- Vapor barrier on ammonia piping on the roof is damaged in numerous locations (see photographs P1150815, P1150816, P1150818, and P1150820).

- Ammonia piping on the roof is not painted and has surface corrosion and pitting (see photographs P1150807 and P1150808).

- Out of service ammonia piping on the roof that is associated with unused Freezer B is pressurized indicating ammonia is present (see photographs P1150843, P1150844, and P1150845).

- The valves on ammonia piping associated with the unused Freezer B did not have lock out/tag proper signage or valve lockout devices on them to prevent them from being opened (see photograph P1150846).

- Freon air handling units on the roof are not labeled with their contents (see photographs P1150821 and P1150823).

- Propane piping on the roof is not adequately labeled to indicate contents and direction of flow (see photographs P1150824 and P1150825).

- The manway into the condenser on the roof does not have a confined space placard (see photograph P1150826).

- Two means of egress are not provided off the two roof levels.

- Pipe support footings are not anchored to the roof (see photographs P1150817 and P1150819).

- No fall protection is provided around the perimeter of the roof (see photograph P1150829).

- Windsocks are not positioned so they can be seen from all locations at ground level (see photograph P1150829).

V. OUT-BRIEF/CLOSING CONFERENCE

An in-person out-brief/closing conference was not conducted at the conclusion of the onsite inspection. Inspector Wallace emailed a copy of the EPA inspection teams' preliminary areas of concern identified during the inspection on to Nicole R. McClure, Environmental Manager on June 22, 2024. The inspection team met virtually over Teams Meeting with representatives from United Natural Foods Inc. on July 1, 2024, at 2:30 PM EST to review the preliminary observations, discuss additional document requests, and explain the next steps in the enforcement process.

VI. FACILITY COMPLIANCE STATUS AND ELEMENTS OF PROOF - EPCRA

EPCRA Section 302

(1**)** Does Facility have on-site, at any one time, extremely hazardous substances (EHS) at or above the TPQ? **Yes, Ammonia and Sulfuric Acid**

(2) List or obtain documentation: **Requested**

(3) How was maximum quantity on-site determined or calculated? **Container and/or equipment size.**

EPCRA Section 303

(1) Facility Coordinator identified per Sec. 303 and date LEPC was notified? **Yes**

EPCRA Section 311

(1) Is Facility required to maintain MSDSs under the OSHA Hazard Communication Standard 29 CFR 1910.1200 (no specific chemical list)? **Yes**

(2) Has the Facility conducted a comprehensive audit to identify SDS chemicals on-site and to determine if the Vermont 100 lb./10,000 lb. TPQ thresholds were exceeded?
No. A 55-gallon drum of cleaning chemical was discovered during the inspection that is not on the EPCRA Tier II report

(3) List of OSHA chemicals manufactured, processed, used/stored, and obtained? **No**

(4) How were the maximum amounts determined? **Container and/or equipment size.**

(5) Section 311 info supplied to the:

SERC (Y/N): **Yes**
LEPC (Y/N): **Unknown**
Local Fire Department(Y/N): **Unknown**
Date: **Unknown**
Chemical List: **Unknown**
SDSs: **Unknown**

(6) Have any new hazardous chemicals, mixtures, or substances been introduced into the Facility in the last 5 years? **Unknown**

(7) If yes, has the Facility submitted updated lists or SDSs? **Unknown**

EPCRA Section 312 (due March 1 of year following reporting calendar year)

(1) Was Tier II form submitted for all required chemicals?
No. A 55-gallon drum of cleaning chemical identified during the inspection is not on the EPCRA Tier II report.

(2) What procedures are used to update Section 312 information for annual submittal and to ensure additional or new chemical data is submitted within 90 days? **Unknown**

(3) Was Facility aware of annual reporting requirements under Section 312? **Yes**

(4) Had the Facility completed and signed a list of all reportable chemicals on site on date of the inspection? **Requested**

(5) Table of EPCRA 312 Reportable Substances:

CAS #	Chemical[1]	Approx. Max. Wt. on Site (Lbs.)	TPQ (Lbs.)[2]	Approx. Ratio (Actual/TPQ)
7664-41-7	Anhydrous Ammonia	6,000	100	60
7664-93-9	Lead Acid Batteries	24,385	100	244

1. Data from RY 2022 EPCRA Tier II Report
2. Vermont Department of Public Safety, "Typical chemicals that need to be reported and the reporting threshold".

VII. ENFORCEMENT HISTORY

Review of EPA's ECHO database from October 2020 to June 2024 indicates there are no prior violations at this UNFI facility.

VIII. ENVIRONMENTAL JUSTICE

According to EPA's Environmental Justice Screening and Mapping Tool (EJ Screen), UNFI is located in an environmental justice area. Disadvantaged socioeconomic indicators show low income, high unemployment, and low life expectancy are greater than the 90th percentile of the State average within a 1-mile radius of the facility. Environmental indicators above the 90th percentile within a 1-mile radius of the facility include ozone, particulate diesel matter, toxic release to air, traffic proximity and wastewater discharges.

Appendix A. Google Earth Image of the United Natural Foods Inc. Facility in Brattleboro, VT