



**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: Zirkle Fruit Co. Prosser
Physical Address: 101 Benitz Road Prosser, Washington 99350
Phone Number: (509) 941-8714
Latitude/Longitude: 46.221111, -119.728333
RMP Facility ID#: 1000 0017 1832
FRS ID#: 110002053214
EJ Concerns: Yes (90%)

CONTACT INFORMATION (RMP Implementation):

Name: Scott Blackledge
Phone Number: (509) 941-8714
E-mail: scottb@zirklefruit.com

EMERGENCY CONTACT INFORMATION:

Name: Donnie J. Blakley
Phone (24-hr): (509) 945-1071
E-mail: [Click or tap here to enter text.](#)
Website: [Click or tap here to enter text.](#)

TRIP DETAILS:

Inspection Date: June 30, 2023
Inspection Time: 8:30 am through 12:00 pm
Inspectors: Mhara Coffman, US EPA Region 10, Lead RMP Inspector
Peter Phillips, US EPA Region 10 SEE Grantee, RMP Inspector
Terry Garcia, US EPA Region 10 SEE Grantee, RMP Inspector
Edward Johannes, US EPA Region 10, RMP Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: June 7, 2006
Date of Latest Update: June 7, 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)
1000100107	Anhydrous Ammonia - Building B	1000125386	49312	3	Ammonia, Anhydrous (7664-41-7)	31,700
1000100108	Anhydrous Ammonia – Building D, E	1000125387	49312	3	Ammonia, Anhydrous (7664-41-7)	14,000

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 ☐
If Yes, Date of Last Inspection:
- 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:

EPCRA TIER II REPORTING:

Did the facility submit the [Enter Year] Tier II report to the SERC? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: February 13, 2023
If No, calendar year of the most recent Tier II:

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 14, 2023

INSPECTION ENTRY:

Mhara Coffman led the inspection entry. The inspection team met with Joshua Austin and facility personnel at the Zirkle Fruit Co. facility in Prosser, Washington. The team arrived at the facility at 08:30 and was joined by the following facility personnel:

Name	Title
Michael Ledon	Compliance Manager
Myles Austin	Refrigeration Manager
Joshua Austin	Process Safety Manager
Scott Blackledge	Safety Manager
Jeff Gill	Director of Facilities
Dave Copeland	Zirkle Fruit Company Operation

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

If Yes, Name and Title of Representative:

The facility is a first responder: No ☒ Yes ☐

If No, Responding Agency

The inspection team was escorted to a conference room located in the facility's office building. Introductions were made by Mhara Coffman, 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. Josh Austin 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 on June 16, 2023 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 ☐

If Yes, Name of Union

An employee representative present during the facility visit: No ☒ Yes ☐

If Yes, Name/Title

GENERAL INFORMATION:

The facility is regulated under the Risk Management Program as a Program Level 3 facility and is owned and operated by Zirkle Fruit Co. The facility stores anhydrous ammonia on site as a refrigerant for apple storage, packing and shipping of cherries from June to July, and wine storage. Liquid propane gas and nitrogen gas are both regulated under the Emergency Planning Community Right to Know Act (EPCRA). There is a maximum amount of 4,000 pounds of propane, and 8,000 pounds of nitrogen on site. There are 12 full-time employees on site associated with fruit packaging. The winery has 25 full-time employees. There are two staffing operators on site. There are no changes to the process in the last 5 years.

Anhydrous ammonia (refrigerant) is stored on site in a closed loop refrigeration system. Anhydrous ammonia is used in the coolers and freezers for fruit packing and storage. There are three engine rooms in Building B, D and E that contain anhydrous ammonia. All engine rooms are equipped with tight fitting doors, exhaust fans, emergency shower, eyewash station, ammonia sensors and alarms. The refrigeration system has six (6) condensers and fifty-two (52) evaporators. There are eight (8) ammonia detectors on-site with a 25-ppm pre-alarm that displays a computer pop-up and a 50-ppm alarm that displays an audio-visual alarm outside the engine rooms. The refrigeration system does allow remote shutdown capable by Bombgar remote access software.

ON-SITE OBSERVATIONS:

The facility tour was conducted from approximately 09:00 to 10:00. The inspection team was escorted by Josh Austin, Myles Austin, Scott Blackledge, Dave Copeland, and Jeff Gill. The inspection team

observed the organics hydrocooler, non-organics hydrocooler, Main Engine Room (Building B), Rainier Line, Building C, Building D, Building E, and Building F.

Photographs were taken of the ammonia refrigeration system. The photographs that were taken at the facility are included in Attachment A to this report.

The organics line hydrocooler was installed in spring 2023 (Photo 1). Outside of the Main Engine Room (Building B) there is an exhaust fan above the Building B roof line (Photo 3). Building B has a windsock on the roof (Photo 22). The Main Engine Room contains an average of 19,000 lbs of anhydrous ammonia. The Main Engine Room door has hazard signage (Photo 4). Next to the inside of the Main Engine Room door is a lockout tagout station (Photo 5). The ammonia detection panel is wall mounted (Photo 6). The Main Engine Room has four (4) compressors (Photo 7-8, 16). According to an Inland Alarm document submitted to the local fire department: (1) Compressors 1 and 2 are 500 horsepower (hp) screw compressors installed in 1999, (2) Compressor 3 is a 100 hp reciprocating compressor installed in 1983, and (3) Compressor 4 is a 350 hp screw compressor installed in 2011. The king valve resides on top of the high-pressure receiver (HPR) (Photo 9 and 18). There are two exhaust fans and a purger in case of a release (Photo 11-12, 17). Several pressure relief valves (PRVs) on the compressors with an install date of February 2018. The due date for the PRVs was February 2023. The replacement PRVs are on back order. The Main Engine Room does not have panic bars on the exit doors (Photo 14). The Main Engine Room's shower and eyewash station is not easily accessible (Photo 15) and is in the back corner of an adjacent workshop.

On route to the Building D engine room is the inorganics hydrocooler for the cherry line (Photo 19). The Building D engine room contains on average 14,000 lbs of anhydrous ammonia. The Building D engine room entrance door has hazard signage (Photo 23). An ammonia piping bridge connects the Building D engine room to the cherry line (Photo 24). A condenser is located on the roof of Building D engine room (Photo 38). The Building D engine room has four compressors (Photo 25). The Inland Alarm document stated the following compressor information: (1) Compressor 1 is a 125 hp screw installed in 1985, (2) Compressor 2 is a 200 hp screw installed in 1985, (3) Compressor 3 is a 250 hp screw installed in 1985, and (4) Compressor 4 is a 500 hp screw installed in 1990. The king valve is located on top of the high-pressure receiver (HPR) (Photo 26 and 33). The low-pressure receiver (LPR) oil pot has significant ice accumulation (Photo 27 and 34). Non-destructive testing point located on transfer vessel from recent Doubl Kold MI audit (Photo 35). There was damage from ice accumulation on transfer vessel (Photo 36). Several PRVs with install date of June and August 2015 are past due for replacement. The PRVs replacement date was June and August 2020. Replacement PRVs are on back order. The Building D engine room ventilation system contains exhaust fans, air intake, and a purger (Photo 28, 29 and 37). The Building D engine room exit door does not have panic bars for emergency egress (Photo 32). The shower and eyewash station for the Building D engine room is not accessible for immediate emergency use (Photo 31). To access the shower and eyewash station one would have to go through two doors, passed the electrical control room.

Building E engine room is not RMP covered. The average amount of anhydrous ammonia in the Building E engine room is 4,000 lbs. A condenser is located on top of roof of Building E engine room (Photo 39). An office space with a control room display is located next to the engine room inside Building E (Photo 40). An ammonia sensor is in the office space (Photo 41). The entrance door to the Building E engine room has hazard signage and PPE by the door (Photo 42). The shower and eyewash station are located outside the entrance door of the Building E engine room (Photo 43). The roof can be accessed by a spiral staircase (Photo 44). The Building E engine room has four compressors (Photo 46). The Inland Alarm document stated the following compressor information: (1) Compressor 1 is a 75 hp

reciprocating installed in 1994, (2) Compressor 2 is a 150 hp reciprocating installed in 1994, (3) Compressor 3 is a 250 hp screw installed in 1994, and (4) Compressor 4 is a 40 hp reciprocating installed in 2023. A Management of Change (MOC) was performed on March 1, 2023, and PSSR was initially performed on April 20, 2023, for the installation of Compressor 4. The initial startup found issues and a second PSSR was completed on August 14, 2023; Compressor 4 has been operational since. The Building E engine room does not have panic bars (Photo 47). Several PRVs with an install dated of April 2017 were past due for replacement. The PRV's were due for replacement 2022. Replacement PRVs are on back order.

After touring the RMP-covered process areas at the Zirkle Fruit Co., the inspection team returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to Michael Ledon, Myles Austin, Josh Austin, Scott Blackledge, Jeff Gill, and Dave Copeland.

INFORMATION COLLECTED FROM FACILITY:

1. MI – MI Audit summary and tracking sheet for last audit
2. SOP certification form

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

1. **Process Safety information [68.65(d)(2)]**: The facility did not install push bar doors at points of egress for engine rooms in Building B, D, and E. [Reference IIAR 13.1.10.3].
2. **Process Safety Information [68.65]**: The facility did not install chem showers and eyewash stations directly adjacent to work areas for immediate emergency use for engine rooms in Building B and D [Reference IIAR 13.1.6.1, ANSI/ISEA Z358.1 – 2009].
3. **General [68.10]**: The facility did not maintain documentation for coordination with local authorities including: The names of individuals involved and their contact information (phone number, email address, and organization affiliation), dates of coordination activities, nature of coordination activities.
4. **General [68.93]**: The facility had not documented emergency coordination activities starting after September 21, 2018. Facility representatives stated that the fire department visits regularly. They did have a documented tabletop exercise from January 23, 2023.
5. **Process Hazard Analysis (PHA) [68.67]**: PHAs must be maintained onsite for the life of the process. The facility is missing the initial PHA. The initial PHA would be from 2006 for Holtzinger, C. M. Fruit Co. Inc. The last two PHAs were conducted in 2016 and 2022. The facility representatives attribute the six-year gap between PHAs to the COVID-19 pandemic. The 2022 PHA was inaccessible during the inspection. The process safety manager stated he accidentally deleted it. The 2022 PHA was received over a month after the inspection on August 8, 2023.
6. **Compliance Audits [68.79(a)]**: The facility has not certified that the ammonia refrigeration process was evaluated for compliance with the provisions of the prevention program at least every three years. The 2018 and 2022 compliance audits were not certified and signed by a company representative. In both the 2018 and 2022 compliance audits tracking sheet the persons responsible for the action item on audit findings was not identified. The four-year gap between the audits was due to the COVID-19 pandemic according to a company representative.
7. **Hazard Assessment [68.36]**: Review hazard assessment offsite consequences every five years. The facility performed hazard assessments reviews in 2014 and 2021. There is a seven-year gap between the hazard assessments reviews.

8. **Mechanical Integrity [68.73(e)]:** Owner or operator did not correct deficiencies in equipment that were outside acceptable limits defined by the process safety information before further use or in a safe and timely manner. PRVs in engine rooms in Building B, D, and E were overdue for replacement.
9. **Pre-Startup Safety Review [68.77(a)]:** The owner or operator did not perform a pre-startup safety review for a new stationary source. The Double Kold mechanical integrity (MI) audit performed October 17, 2022, indicate that a Pre-Start Up Safety Review (PSSR) was not done for the inorganics hydrocooler.

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.

1. 2022 PHA
2. 2016 PHA recommendations
3. Initial PHA
4. 2022 MI audit summary and tracking sheet
5. SOP certification form

INSPECTION REPORT CERTIFICATION:

This is to certify that I, Mhara Coffman, was the lead inspector at this facility and that I have verified the accuracy of the observations in this inspection report:

MAIGHDEAN-MHARA
COFFMAN

Digitally signed by MAIGHDEAN-
MHARA COFFMAN
Date: 2023.11.09 13:52:09 -08'00'

Inspector Signature

JAVIER MORALES

Digitally signed by JAVIER
MORALES
Date: 2023.11.13 09:32:13 -08'00'

RMP Coordinator/Approval

ERIN WILLIAMS

Digitally signed by ERIN WILLIAMS
Date: 2023.11.13 14:41:23 -08'00'

EPCRA Coordinator/Approval

MATTHEW
QUARTERMAN

Digitally signed by MATTHEW
QUARTERMAN
Date: 2023.11.15 16:00:16 -08'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: Zirkle Fruit Co. Prosser

City, State: Prosser, WA

Photographer: Peter Phillips

File Name	Photo	Date	Time	Description
Building B (Main Engine Room)				
IMG_0250.JPG	1	6/30/2023	9:09 AM	Hydrocooler organic line
IMG_0251.JPG	2	6/30/2023	9:11 AM	Condenser atop engine room
IMG_0252.JPG	3	6/30/2023	9:12 AM	Engine room exhaust fan
IMG_0253.JPG	4	6/30/2023	9:13 AM	Engine room door, ammonia control box, and PRV stack
IMG_0254.JPG	5	6/30/2023	9:14 AM	LOTO station
IMG_0255.JPG	6	6/30/2023	9:14 AM	Ammonia detection panel
IMG_0256.JPG	7	6/30/2023	9:17 AM	Engine room compressors
IMG_0257.JPG	8	6/30/2023	9:17 AM	Engine room compressors
IMG_0258.JPG	9	6/30/2023	9:17 AM	High pressure receiver
IMG_0259.JPG	10	6/30/2023	9:17 AM	Low pressure receiver
IMG_0260.JPG	11	6/30/2023	9:18 AM	Exhaust fan 1
IMG_0261.JPG	12	6/30/2023	9:19 AM	Exhaust fan 2
IMG_0262.JPG	13	6/30/2023	9:20 AM	Engine room gauges
IMG_0263.JPG	14	6/30/2023	9:21 AM	Engine room exit door - no panic bar
IMG_0264.JPG	15	6/30/2023	9:22 AM	Shower/eye wash station
IMG_0265.JPG	16	6/30/2023	9:22 AM	Engine room compressor
IMG_0266.JPG	17	6/30/2023	9:23 AM	Engine room purger
IMG_0267.JPG	18	6/30/2023	9:23 AM	King valve
IMG_0268.JPG	19	6/30/2023	9:26 AM	Hydro cooler for cherry line
IMG_0269.JPG	20	6/30/2023	9:29 AM	Hydro cooler for cherry line
IMG_0270.JPG	21	6/30/2023	9:29 AM	Ammonia detector for cherry line
IMG_0271.JPG	22	6/30/2023	9:32 AM	Wind sock
Building D				
IMG_0272.JPG	23	6/30/2023	9:36 AM	Engine room door
IMG_0273.JPG	24	6/30/2023	9:37 AM	Ammonia piping bridge to cherry line
IMG_0274.JPG	25	6/30/2023	9:37 AM	Engine room compressors
IMG_0275.JPG	26	6/30/2023	9:38 AM	Engine room high pressure receiver
IMG_0276.JPG	27	6/30/2023	9:38 AM	Engine room low pressure receiver
IMG_0277.JPG	28	6/30/2023	9:39 AM	Engine room purger unit
IMG_0278.JPG	29	6/30/2023	9:39 AM	Engine room air intake
IMG_0279.JPG	30	6/30/2023	9:40 AM	Engine room ammonia detector
IMG_0280.JPG	31	6/30/2023	9:40 AM	Engine room shower/eye wash station
IMG_0281.JPG	32	6/30/2023	9:41 AM	Engine room exit door - no panic bar
IMG_0282.JPG	33	6/30/2023	9:41 AM	Engine room king valve
IMG_0283.JPG	34	6/30/2023	9:42 AM	Engine room ice accumulation on accumulator oil pot
IMG_0284.JPG	35	6/30/2023	9:43 AM	Non-destructive testing point on transfer vessel
IMG_0285.JPG	36	6/30/2023	9:43 AM	Damage from ice accumulation on transfer vessel
IMG_0286.JPG	37	6/30/2023	9:45 AM	Engine room exhaust fan
IMG_0287.JPG	38	6/30/2023	9:46 AM	Condenser atop engine room
Building E (not RMP covered)				
IMG_0288.JPG	39	6/30/2023	9:50 AM	Engine room condenser
IMG_0289.JPG	40	6/30/2023	9:51 AM	Engine room control room
IMG_0290.JPG	41	6/30/2023	9:51 AM	Engine room ammonia detector
IMG_0291.JPG	42	6/30/2023	9:52 AM	Engine room door
IMG_0292.JPG	43	6/30/2023	9:52 AM	Engine room shower/eye wash station
IMG_0293.JPG	44	6/30/2023	9:53 AM	Engine room overview
IMG_0294.JPG	45	6/30/2023	9:54 AM	Engine room high pressure receiver
IMG_0295.JPG	46	6/30/2023	9:54 AM	Engine room compressor
IMG_0296.JPG	47	6/30/2023	9:56 AM	Engine room exit door - no panic bar
IMG_0297.JPG	48	6/30/2023	9:57 AM	Engine room low pressure receiver

Building B (Main Engine Room)

Zirkle Fruit