REGION 1
BOSTON, MA 02109

Date: February 15, 2024

From: Leonard Wallace IV, Andrew Meyer, and Aaron Gilbert, 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) and General Duty Clause (GDC) Section 112(r)(1) and Emergency Planning and Community Right-To-Know Act (EPCRA) Sections 302-313, and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 103 of Powder Ridge Mountain Park and Resort, LLC in Middlefield, Connecticut.

I. GENERAL INFORMATION

Facility Name: Powder Ridge Mountain Park and Resort, LLC
Dun and Bradstreet Number: 04-047-8626
RMP Number: N/A

Address: 99 Powder Hill Road
Middlefield, CT 06455

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
Zachary Good, Eastern Research Group, Inc. (ERG)

Inspection Date: December 7, 2023

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

Purpose of Inspection: This inspection was conducted as a routine EPA CAA § 112(r)(1)/EPCRA compliance evaluation inspection. The Powder Ridge Mountain Park and Resort, LLC Facility in Middlefield, Connecticut (CT) was selected for inspection because it is a stationary source with an unknown amount of ammonia onsite.

Current Owner: Powder Ridge Mountain Park and Resort, LLC

Current Operator: Powder Ridge Mountain Park and Resort, LLC

On the Tier 2 they listed the Facility Name as Snow Factory.

Primary NAICS codes: 713920 (Skiing Facilities)

Number of full-time employees (FTEs): Ranges from 40-50 at the time of the inspection to approximately 250 during "on-season" hours

Estimated Annual Sales: Not Available

Relationship to other firms, parent corporation, subsidiaries, and location of off-site facilities:

Parent Corporation: Powder Ridge Mountain Park and Resort, LLC

II. GENERAL FACILITY DESCRIPTION

The Powder Ridge Mountain Park and Resort, LLC Facility in Middlefield, CT (Powder Ridge or the Facility) is a year-round outdoor winter sports venue featuring spaces for skiing, snowboarding, snow tubing, and other types of outdoor recreational activities. The Facility includes an onsite lodge, restaurant, and equipment rental facilities. The Facility features several ski lifts to allow for transportation of people from the lodge to locations higher up the ridge to allow for skiing, snowboarding, and/or tubing down to lower locations.

According to Facility personnel, Powder Ridge was originally opened in the 1960s as an outdoor recreational facility and it remained open and actively operated as such through the early-2000s. The Facility closed in the early-2000s but was then reopened by the current Facility owners for outdoor recreational purposes in December 2013. The Facility has been operated as an outdoor winter recreational sports facility since that time. Facility personnel reported that they employ between 40 to 250 full-time employees depending on the time of year, in support of day-to-date site operations.

Facility personnel indicated during the on-site inspection that a two-level, skid-mounted refrigeration/ice-making unit had been installed on the ski slope immediately adjacent to the snow tubing area in November 2023 and that approximately 1,200-pounds of anhydrous ammonia had been charged into the unit. The ground-level portion of the unit was observed to contain the ice-making equipment and limited sections of ammonia-containing piping. The second level of the unit contained the majority of the ammonia-containing equipment (i.e., piping, pressure vessels) as well as the glycol system. The roof-level of the unit contained ammonia-containing piping, the penthouse of the ice-making section of the unit, the evaporative condenser, and the combined pressure relief valve (PRV) header exhaust point for the ammonia refrigeration equipment associated with the unit. At the time of the inspection, the refrigeration/ice-making unit was not yet actively producing ice or snow and the facility had not notified the local planning officials or submitted a Tier II chemical inventory report, as required.

The Facility is located in a primarily residential area of Middlefield, CT. Residential areas are located approximately 0.25-miles to the east and west of the Facility. There are several elementary schools located within 1.25-miles of the Facility, both to the northeast (approximately 1.25-miles away) and the west (approximately 1.00-miles away). Attachment 1 includes a GoogleEarth® aerial photograph of the Powder Ridge Facility located in Middlefield, CT.

III. IN-BRIEF/OPENING CONFERENCE

The U.S. EPA inspection team including Leonard Wallace, IV, Andrew Meyer, Aaron Gilbert, Zachary Good (U.S. EPA contractor inspector) entered the Facility at approximately 9:45 AM EST. The U.S. EPA inspection team was supported by the individuals listed in **Table 1** from Middlefield Volunteer Fire Company, Guilford Fire Department, and the Connecticut Department of Energy & Environmental Protection (CT DEEP):

Table 1. Inspection Participants, Government Agencies:

Name	Title/Company	E-mail
Peter Tyc	Middlefield Fire	ptyc@middlefieldfire.com
Clint Haverkamef	Guilford Fire	chaverkamef@guilfordfire.com
Mike Shove	Guilford Fire	mshove@guilfordfire.com
Jed Morrissey	Guilford Fire	jmorrissey@guilfordfire.com
Diane Duva	CT DEEP	Diane.duva@ct.gov
Timothy Keefe	CT DEEP	Timothy.keefe@ct.gov
Rich Scalora	CT DEEP	Richard.sclaroa@ct.gov
Robert Schuler	CT DEEP	Robert.schuler@ct.gov
Richard Swan	CT DEEP	Richard.swan@ct.gov
Tom Welch	CT DEEP	Thomas.welch@ct.gov

The U.S. EPA inspection team presented identification to Mr. Sean Hayes, owner and Chief Operation Officer (CEO) of Power Ridge. 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 Mr. Hayes, who signed as the Recipient of the Notice. Mr. Hayes 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 2** participated in the on-site inspection:

Table 2. Facility Representatives:

Name	Title/Company	Phone Number	E-mail
Sean Hayes	Owner/CEO Powder Ridge	(860) 918-3092	shayes@powderridgepark.com
Tom Loring	Director of Guest Services Powder Ridge	(802) 318-5779	tloring@powderridgepark.com
Mike Kurys	Director of Operations Powder Ridge	(860)301-8857	mkurys@brownstonepark.com
Jason Kilduff	Field Supervisor, Heavy Refrigeration EMCOR Services New England Mechanical (NEMSI)	(860) 306-5631	jkilduff@nemsi.com
Craig Raphaelson	Northeast Sales Manager Demaclenko America	(603) 393-0315	craig.raphaelson@demaclenko.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. Chemicals in Your Community brochure (EPA 550-K-99-001, December 1999)
6. CAMEO Chemicals Software (website: https://www.epa.gov/cameo/cameo-chemicals-software).

Inspector Wallace stated that after the opening meeting, the inspectors would do a walk-through inspection of the refrigeration process and all areas of the Facility where anhydrous ammonia was currently present. 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 DEMACLENKO SnowPRO260 (KTI-Plersch Kältetechnik GmbH) unit which was placed on the ski hill just above the Snow Tubing area:

1. Exterior of the Refrigeration/Ice-Making Unit
2. First Floor of the Refrigeration/Ice-Making Unit
3. Second Floor of the Refrigeration/Ice-Making Unit
4. Exterior/Roof Level of the Refrigeration/Ice-Making Unit

Inspector Wallace took a total of 56 digital photographs during the inspection to provide reference documentation of conditions observed. The photographs are referenced throughout the document.

The following include areas of concern identified in each of the areas during the physical inspection.

Exterior of the Refrigeration/Ice-Making Unit

The U.S. EPA inspection team approached the ski slopes from the eastern portion of the Facility, from the ski lodge and primary resort building. EPA inspectors began by observing the two-level ice-making unit from the exterior of the structure on the concrete pad.

EPA inspectors identified the following areas of concern based on a tour of the exterior of the ice-making unit.

- At the time of the inspection, facility
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- personnel stated that ammonia had been delivered to the Facility and that the system had been charged with approximately1,200 pounds of ammonia. However, Facility personnel had yet to notify local planning officials and a Tier II chemical inventory report had yet to be filed.
- Inspectors observed at the time of the inspection that the two-level ice-making unit was not bolted down to the concrete pad.
- The three existing primary entry/egress doors located on the first-level, second-level, and top of the unit were not affixed with appropriate National Fire Protection Agency (NFPA) diamonds to indicate the presence of hazards.
- No Piping and Instrumentation Diagram (P&ID) was posted outside of the primary AMR entrance to identify the critical valves for emergency shutdown of the ammonia refrigeration system (Photographs P1130944, P1130945, and P1130946).

- No Emergency Contact numbers to contact during an event or Emergency Shutdown procedures were posted outside of the primary AMR entrance (Photographs P1130944, P1130945, and P1130946).
- The entry/egress doors on the first and second levels of the ice-making unit were not affixed with signage or labeling indicating that access to the units was restricted to authorized personnel, only (Photographs P1130944, P1130945, and P1130946).
- The emergency stop (E-Stop) actuation button located adjacent to the entry/egress doors on the first and second levels of the ice-making unit were not clearly labeled to indicate its function (Photographs P1130944, P1130945, and P1130946). Additionally, the E-Stop actuation button was not tamper-proof.
- The emergency ventilation actuation switch located adjacent to the entry/egress door on the second level of the ice-making unit was not clearly labeled to indicate its function. Additionally, there was not an emergency ventilation actuation switch located outside the entry/egress door on the first level of the unit (Photograph P1130944). Furthermore, the emergency ventilation actuation button was not tamper-proof.
- Ammonia audible/visual alarms were not present adjacent to the entry/egress doors on both the first and second levels of the ice-making unit. Where present, ammonia audible/visual alarms were not clearly labeled to indicate their alarm function (Photographs P1130944, P1130945, and P1130946).

<u>First Floor of the Refrigeration/Ice-Making Unit</u>

The U.S. EPA inspection team entered the ground-level section of the ice-making unit through the primary entry/egress door located on the right-hand side of the structure to observe ice-making equipment and associated ammonia piping, which has a direct interface with the ammonia refrigeration equipment located on the second level.

EPA inspectors identified the following areas of concern based on a tour of the interior of the first level of the ice-making unit.

- Inspectors observed that ammonia piping was not appropriate labeled in accordance with applicable ANSI/IIAR standards (Photographs P1130951 and P1130955).
- The entry/egress doors on the first level of the ice-making unit was not equipped with panic hardware (Photographs P1130944).
- Ammonia detectors were not observed to be present within the first level of the ice-making unit.
- There was no emergency safety shower/eyewash station located inside or outside the entry/egress door to the first level of the ice-making unit (Photographs P1130941, P1130944, P1130945, P1130957, and P1130960).
- Oil and other maintenance chemicals were stored inside of the first level of the ice-making unit without appropriate secondary containment structures (Photograph P1130949).
- Inspectors observed that there was not an adequate level of clearance (i.e., 36-inches) between ammonia refrigeration equipment and the interior walls of the ice-making unit to allow for equipment and emergency response access (Photograph P1130950).
- Ceiling-mounted electrical heaters were observed to be present in the first level of the ice-making units (Photograph P1130950 and P1130983). At the time of the inspection, Facility personnel were not aware whether the electrical heaters were tied into the E-Stop functionality for the unit.
- Portable, non-permanent room heaters were present in the first level of the ice-making unit near the ammonia refrigeration and mechanical equipment.
- Ammonia piping inside of the first level of the ice-making unit were covered with Armorflex insulation, which may retain moisture and increase the rate of corrosion (Photographs P1130951, P1130957, P1130958, P1130959).

Second Floor of the Refrigeration/Ice-Making Unit

The U.S. EPA inspection team used the stairwell located on the exterior of the structure to access the platform encircling the second level of the ice-making unit. EPA inspectors entered the structure through the primary entry/egress door to observe ammonia piping, ammonia refrigeration equipment, and the propylene glycol system housed within the second level of the structure.

EPA inspectors identified the following areas of concern based on a tour of the interior of the second level of the ice-making units.

- Inspectors observed that ammonia piping was not appropriately labeled in accordance with applicable ANSI/IIAR standards (Photographs P1130959, P1130961, P1130964, P1130966, and P1130972).
- The Propylene Glycol system piping was not labeled with content and flow direction (Photographs P1130968 and P1130969).
- The entry/egress doors on the second level of the ice-making units were not equipped with panic hardware.
- Inspectors observed stairs to second level of the ice-making unit and metal grating platform around part of the upper level with only one egress (Photographs P1130945, P1130946, and P1130948).
- There was no emergency safety shower/eyewash station located outside the entry/egress door second level of the ice-making unit. The emergency eyewash station located immediately inside the second level of the ice-making unit was not hard piped and was not equipped with an emergency safety shower (Photographs P1130941, P1130944, P1130945, P1130957, and P1130960).
- The facility personnel stated the louvered atmospheric air inlet vent was not motorized and worked on change of air pressure in the unit to open. The emergency exhaust system inlet defaults is in the closed position (Photograph P1130944).
- Ceiling-mounted electrical heaters were observed to be present in the second level of the ice-making unit (Photograph P1130950 and P1130983). At the time of the inspection, Facility personnel were not aware whether the electrical heaters were tied into the E-Stop.
- Portable, non-permanent room heaters were present in the second level of the ice-making unit near the ammonia refrigeration and mechanical equipment.
- Ammonia piping and pressure vessels inside of the second level of the ice-making unit were covered with Armorflex insulation, which may retain moisture and increase the rate of corrosion (Photographs P1130961, P1130973, and P1130977).
- Ammonia piping throughout the ice-making unit did not have a consistent color-coding scheme, such that multiple colors (e.g., red, green, and blue) were used to denote ammonia piping (Photographs P1130961, P1130964, P1130966, and P1130972).
- Inspectors observed openings in the second level of the ice-making unit for ammonia piping. The openings were not fully enclosed from the outside environment (Photographs P1130966).
- The "King Valve" for the ammonia system was not clearly labeled (Photographs P1130960, P1130964, and P1130971). Additionally, the "King Valve" was not directly operable from floor-level, as the valve wrench required to operate the king valve was not readily accessible.
- The High-Pressure Receiver (HPR) was not clearly marked (Photographs P1130960, P1130964, and P1130971).
- There was no Oil Pot for the system.

Exterior/Roof Level of the Refrigeration/Ice-Making Unit

The U.S. EPA inspection team accessed the roof of the ice-making unit using the available ladder access in order to observe ammonia piping and the ammonia condensers located on the top-level of the structure.

The combined pressure relief header exhaust point was observed to be located at the back-end of the unit, behind the condensers.

EPA inspectors identified the following areas of concern based on a tour of the exterior/roof level of the ice-making units.

- There was only one way to egress this level.
- Inspectors observed that ammonia piping was not appropriately labeled in accordance with applicable ANSI/IIAR standards exterior to the unit on the second level near the condensers.
- The emergency ventilation system exhaust was observed to discharge horizontally from the penthouse level of the ice-making unit (Photographs P1130947 and P1130975).
- The door to the plate section and the emergency ventilation penthouse areas of the ice-making unit were not affixed with Confided Space Entry signage (Photographs P1130947, P113095, and P1130989).
- The small door on the upper unit to the plate section and the emergency ventilation penthouse areas of the ice-making unit did not have any audible/visual ammonia alarms near it (Photograph P1130986).
- The exhaust for the combined pressure relief header at the top of the ice-making skid was observed to discharge less than 7.25 feet above the roof line of the ice-making skid (Photograph P1130986).

V. OUT-BRIEF/CLOSING CONFERENCE

Inspector Wallace emailed a copy of the EPA inspection teams' preliminary areas of concern identified during the inspection on to Mr. Hayes on December 14, 2023. The inspection team met virtually to conduct the out-brief/closing conference with representatives from Powder Ridge on December 18, 2023, at 2:30 PM EST to review the preliminary observations, discuss additional document requests, and explain the next steps in the enforcement process.

The following areas of concern were identified during the out-brief:

1. At the time of the inspection, ammonia had been delivered to the Facility and charged with approximately1,200 pounds of ammonia into the refrigeration/ice-making system. However, Facility personnel had yet to notify local planning officials and a Tier II chemical inventory report had yet to be filed.
2. Inspectors observed at the time of the inspection that the two-level ice-making units were not bolted down to the concrete pad.
3. Ammonia piping was not appropriate labeled in accordance with IIAR standards in the following areas of the ice-making skid: (1) exterior to the unit on the second level; (2) interior to the unit on the first level, in the mechanical area (Photographs P1130951 and P1130955); (3) interior to the unit on the second level in between the pressure vessels containing ammonia (Photographs P1130959, P1130961, P1130964, P1130966, and P1130972); and (4) on the top of the unit around the condensers.
4. The Propylene Glycol system piping was not labeled with content and flow direction (Photographs P1130968 and P1130969).
5. The three existing primary entry/egress doors located on the first-level, second-level, and top of the units were not affixed with appropriate NFPA diamonds to indicate the presence of hazards (Photographs P1130942, P1130945, and P1130989).
6. No P&ID was posted outside of the primary AMR entrance to identify the critical valves for emergency shutdown of the ammonia refrigeration system.
7. No Emergency Contact number to call during an event or Emergency Shutdown procedures was posted outside of the primary AMR entrance.

8. The entry/egress doors on the first and second levels of the ice-making unit were not affixed with signage or labeling indicating that access to the units was restricted to authorized personnel, only (Photographs P1130944, P1130945, and P1130946).
9. The entry/egress doors on the first and second levels of the ice-making units were not equipped with panic hardware (Photographs P1130944).
10. The first and second levels of the ice-making units were only equipped with a single entry/egress doorway (Photographs P1130944, P1130945, and P1130946).
11. There were stairs to second levels of the ice-making units and metal grating platform around part of the upper level with only one egress (Photographs P1130945, P1130946, and P1130948).
12. The emergency stop (E-Stop) actuation buttons located adjacent to the entry/egress doors on the first and second levels of the ice-making units were not clearly labeled to indicate their function (Photographs P1130944, P1130945, and P1130946).
13. The emergency ventilation actuation switch located adjacent to the entry/egress door on the second level of the ice-making unit was not clearly labeled to indicate its function. Additionally, there was not an emergency ventilation actuation switch located outside the entry/egress door on the first level of the unit (Photograph P1130944).
14. The emergency ventilation actuation switch and the emergency stop (E-Stop) actuation buttons were not tamper-proof.
15. Ammonia audible/visual alarms were not present adjacent to the entry/egress doors on both the first and second levels of the ice-making skid. Where present, ammonia audible/visual alarms were not clearly labeled to indicate their alarm function (Photographs P1130944, P1130945, and P1130946).
16. Ammonia detectors were not observed to be present within the first level of the ice-making unit.
17. There was no emergency safety shower/eyewash station located inside or outside the entry/egress door to the first level of the ice-making unit. There was no emergency safety shower/eyewash station located outside the entry/egress door second level of the ice-making unit. The emergency eyewash station located immediately inside the second level of the ice-making unit was not equipped with an emergency safety shower (Photographs P1130941, P1130944, P1130945, P1130957, and P1130960).
18. Oil and other maintenance chemicals were stored inside of the first level of the ice-making unit without appropriate secondary containment structures (Photograph P1130949).
19. Inspectors observed that there was not an adequate level of clearance (i.e., 36-inches) between ammonia refrigeration equipment and the interior walls of the ice-making unit to allow for equipment and emergency response access (Photograph P1130950).
20. The emergency ventilation system exhaust was observed to discharge horizontally from the penthouse level of the ice-making unit (Photographs P1130947 and P1130975).
21. The facility personnel stated the louvered atmospheric air inlet vent was not motorized and worked on change of air pressure in the unit to open. The emergency exhaust system inlet draw point defaults is in the closed position.
22. Ceiling-mounted electrical heaters were observed to be present in the first and second level of the ice-making units (Photograph P1130950 and P1130983). At the time of the inspection, Facility personnel were not aware whether the electrical heaters were tied into the E-Stop functionality for the skid.
23. Portable, non-permanent room heaters were present in the first and second level of the ice-making units near the ammonia refrigeration and mechanical equipment.
24. Ammonia piping and pressure vessels inside of the first and second levels of the ice-making units were covered with Armorflex insulation, which may retain moisture and increase the rate of corrosion (Photographs P1130951, P1130957, P1130958, P1130959, P1130961, P1130973, and P1130977).
25. Ammonia piping throughout the ice-making units did not have a consistent color-coding scheme, such that multiple colors (e.g., red, green, and blue) were used to denote ammonia piping (Photographs P1130961, P1130964, P1130966, and P1130972).

26. Inspectors observed openings in the second level of the ice-making unit for ammonia piping. The openings were not fully enclosed from the outside environment (Photographs P1130966).
27. The "King Valve" for the ammonia system was not clearly labeled (Photographs P1130960, P1130964, and P1130971). Additionally, the "King Valve" was not directly operable from floor-level, as the valve wrench required to operate the king valve was not readily accessible.
28. The High-Pressure Receiver (HPR) was not clearly marked (Photographs P1130960, P1130964, and P1130971).
29. The door to the plate section and the emergency ventilation penthouse areas of the ice-making unit were not affixed with Confided Space Entry signage (Photographs P1130947, P113095, and P1130989).
30. The small door on the upper unit to the plate section and the emergency ventilation penthouse areas of the ice-making unit did not have any audible/visual alarms near it (Photograph P1130986).
31. The exhaust for the combined pressure relief header at the top of the ice-making skid was observed to discharge less than 7.25 feet above the roof line of the ice-making skid (Photograph P1130986).
32. At the time of the inspection, Facility personnel were unable to access ammonia detector readings remotely and the only readout for the ammonia detector was inside of the second level of the ice-making unit where the ammonia refrigeration equipment and piping was also located.
33. At the time of the inspection, Facility personnel were unable to confirm whether the ammonia detection system and emergency ventilation system were provided with an uninterruptible backup power supply to allow for continuous operations in the event of a power outage.
34. Forward your contact information to: Charles I Colley, Chief, Chemical Security -New England R-I Cybersecurity and Infrastructure Security Agency, 202.302.6367 Mobile, 617.565.2919 Office, Email: charles.colley@cisa.dhs.gov for Security assistance.

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? At the time of the inspection, ammonia had been delivered to the Facility and charged with approximately 1,200 pounds of ammonia into the refrigeration/ice-making system. However, Facility personnel had yet to notify local planning officials and a Tier II chemical inventory report had yet to be filed.

(2) List or obtain documentation: Inspectors' observations; information provided by Facility personnel.

(3) How was maximum quantity on-site determined or calculated?
Inspectors' observations; information provided by Facility personnel.

EPCRA Section 303
(1) Facility Coordinator identified per Sec. 303 and date LEPC was notified?
Unknown; Notification had not yet been made as of the date of inspection.

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 MSDS chemicals on-site and to determine if 500 lb./10,000 lb./TPQ thresholds were exceeded? Unknown.

(3) List of OSHA chemicals manufactured, processed, used/stored, and obtained? Yes, requested facility SDSs and chemical inventory data for all chemicals at the facility.

(4) How were the maximum amounts determined? Inspectors' observations; information provided by Facility personnel.

(5) Section 311 info supplied to the:

SERC (Y/N):	Unknown
LEPC (Y/N):	N; Notification had not yet been made as of the date of inspection
Local Fire Department(Y/N):	N; Notification had not yet been made as of the date of inspection
Date	N; Notification had not yet been made as of the date of inspection
Chemical List	Unknown
SDSs	N; Notification had not yet been made as of the date of inspection

(6) Have any new hazardous chemicals, mixtures, or substances been introduced into the Facility in the last 5 years? Yes; anhydrous ammonia.

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

EPCRA Section 312 (due March 1 of year following reporting calendar year)
(1) Was Tier II form submitted for all required chemicals?
At the time of the inspection, ammonia had been delivered to the Facility and charged with approximately 1,200 pounds of ammonia into the refrigeration/ice-making system. However, Facility personnel had yet to notify local planning officials and a Tier II chemical inventory report had yet to be filed.

(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? Unknown

(4) Had the Facility completed and signed a list of all reportable chemicals on site on date of the inspection?
No, chemical inventory data requested to review post-inspection.

(5) Table of EPCRA 312 Reportable Substances:

CAS #	Chemical	Approx. Max. Wt. on Site (Lbs.)	TPQ (Lbs.)	Approx. Ratio (Actual/TPQ)
7664-41-7	Ammonia, anhydrous	1,200	500	2.4

Source: Inspectors' observations; information provided by Facility personnel

VII. ENFORCEMENT HISTORY

Data available via ECHO indicates that the Facility does not have a history of environmental enforcement in relation to the metrics summarized via U.S. EPA's database.

VIII. ENVIRONMENTAL JUSTICE

The ECHO and EJSCREEN data indicate that the Facility is not in an area of Environmental Justice (EJ) interest based on the levels shown for relevant EJ indices.

Attachment 1

Google Earth Image of the
Powder Ridge Mountain Park and Resort, LLC Facility in Middlefield, CT