



**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: Honeybear Growers
Physical Address: 15 Honeybear Lane, Brewster, WA 98812
Phone Number: 509-689-3479
Latitude/Longitude: 48.062722 / -119.443456
RMP Facility ID#: 100000238799
FRS ID#: 110071177435
EJ Concerns: Yes (Above 80%)

CONTACT INFORMATION (RMP Implementation):

Name: Steve Stewart
Phone Number: 509-689-3479
E-mail: steve.stewart@honeybeargrowers.com

EMERGENCY CONTACT INFORMATION:

Name: Ryan Moses
Phone (24-hr): 509-846-9243
E-mail: ryan.moses@honeybeargrowers.com

TRIP DETAILS:

Inspection Date: May 24, 2022
Inspection Time: 0900 hours through 1230 hours
Inspectors: Terry Garcia, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Peter Phillips, US EPA Region 10 SEE Grantee, RMP Inspector
Edward Johannes, US EPA Region 10 SEE Grantee, EPCRA Inspector
Lisa Graves, Weston Solutions, Inc., EPA START Contractor

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: May 17, 2018
Date of Latest Update: May 17, 2018

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)
1000087547	Ammonia Refrigeration	1000109260	49312	3	Ammonia, Anhydrous (7664-41-7)	15,000

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 2021 Tier II report to the SERC? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 1/27/2022

If No, calendar year of the most recent Tier II: 2021

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

If Yes, Date the Tier II was submitted: 1/27/2022

INSPECTION ENTRY:

Terry Garcia led the inspection entry. The EPA Inspection Team met with facility representative Ryan Moses at the Honeybear Growers facility in Brewster, Washington. EPA arrived at the facility at 0900 hours and was joined by the following facility personnel:

Name	Title
Ryan Moses	Production/Refrigeration Manager, Honeybear Growers
Michael Kok	Refrigeration Operator, Honeybear Growers
Carol Davis	Ammonia Compliance Consulting
Mike Davis	Ammonia Compliance Consulting

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: Brewster Fire and Yakima Fire. Okanogan LEPC

The inspection team was escorted to a conference room located in the facility's office building. Introductions were made by Terry Garcia, 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. Ryan Moses 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 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: Ryan Moses, Refrigeration Manager and Michael Kok, Refrigeration Operator

GENERAL INFORMATION:

The facility is regulated under the Risk Management Program as a Program Level 3 facility and is owned and operated by Honeybear Growers, a Washington Corporation. Honeybear Growers (the facility) is located outside the City of Brewster, Okanogan County, Washington. The facility operates as an apple packing and refrigeration warehouse which utilizes an ammonia refrigeration system. The ammonia refrigeration system, as reported in their latest RMP (first time submission in 2018) is 15,000 lbs. At time of inspection the quantity of ammonia in the largest vessel was 10,238 lbs. The facility's 2021 Tier II reports a maximum amount of ammonia at 14,804 lbs. There are 135 full-time employees including two Operators, Mr. Ryan Moses (15 years) and Mr. Mike Kok (1 years) who are responsible for refrigeration operations at the facility. The hours of operations are Monday – Friday 6:30 AM – 3:30 PM.

Honeybear Growers (the facility) first time submission was in 2018. Honeybear Growers facility packages and stores apples in refrigerated rooms while the produce awaits shipment. A single refrigeration system supports ten controlled atmosphere rooms within the facility. The facility refrigeration operator checks the ammonia refrigeration system each operating workday, and refrigerated areas are continuously monitored by an ammonia leak detection system. A computer system remotely notifies refrigeration operators when an alarm is triggered, or refrigeration parameters are out-of-range. There are no process modifications that impact the facility's refrigeration system. The facility has established an Emergency Action Plan (EAP) in the event of an ammonia release.

ON-SITE OBSERVATIONS:

The facility tour was conducted from approximately 0930 hours to 1030 hours. The EPA Inspection Team was escorted by facility representatives Ryan Moses, Michael Kok, and Mike Davis. PPE required and worn by EPA inspectors and facility representatives included: high visibility vests, safety eyewear, hearing protection in the machine rooms, and safety shoes. EPA observed the Refrigeration Office; the Refrigeration Machine Room (Engine Room); exterior exit door clearly marked with NFPA 704 diamond signage and Restricted Access Area Hazcom (Photo 30). Visual and audible alarms and Manual and Emergency Shutoff switches were also observed. There was one (1) ammonia detector located in the Engine Room. EPA also observed safety signage at access doors to two additional controlled atmosphere rooms (CA 19 and CA 20).

EPA observed two controlled atmosphere rooms (CA 19 and CA 20), and Common Storage 1 Mezzanine (Photo 1), Cold Room 18 (Photos 2 and 3), and Common Storage 2 (Photos 10-12) that included evaporators, ammonia sensor intakes, and ammonia leak detection tubes. The ammonia piping and ammonia sensor network panel from a mezzanine in the area were observed in Common Storage 1

(Photos 1 and 4-6). Pressure relief valves are located on the roof top (Photos 7-9).

The Engine Room contains the main equipment for the ammonia refrigeration system, including the high-pressure receiver (HPR) vessel and associated king valve, exhaust fan, intake vents, (3) three screw compressors (Photo 20), valves, and the ammonia leak detection device (Photos 18-28). There were (2) two condensers located on the building rooftop (Photo 29). A dedicated Refrigeration Office adjacent to the Engine Room includes a computer terminal and ammonia sensor network panel (Photos 13-17) which allow facility personnel to monitor refrigeration equipment parameters in all process areas.

The facility ammonia refrigeration equipment was clearly labeled and tagged. In addition, safety features were observed throughout the facility including Safety Data Sheets and PPE (Photo 19), rooftop windsocks (Photo 29), manual emergency shut offs (Photo 30), and Hazcom signage visible (Photos 31 and 32).

Photographs of the refrigeration system components and pertinent safety measures are included in Attachment A to this report.

After touring the RMP-covered process areas at the Honeybear Growers facility, the inspection team returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to Ryan Moses, Michael Kok, Mike Davis, and Carol Davis.

INFORMATION COLLECTED FROM FACILITY:

1. Facility Site Map - 1 page
2. Engine Room Layout - 1 page
3. Email to Emergency Management regarding Tier II submittal - 1 page
4. PSM 8 Mechanical Integrity - 2 pages
5. HBG Relief Data - 2 pages
6. Contractor Mailing List - 1 page
7. Employee SOP Training Log - 1 page

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

1. The facility does not adequately document the refrigeration operator's knowledge to safely carry out responsibilities specified in the operating procedures [68.71(a)(1-3)]. The training documentation did not show that the facility has documented site specific operator training for Tony Perez, Ryan Moses and Mike Kok.
2. The facility did not show that each employee involved in maintaining the on-going integrity of process equipment, was trained in an overview of that process and its hazards and in the procedures applicable to the employee's job tasks to assure that the employee can perform the job tasks in a safe manner, as required [68.73(c)]. Training documents provided does not document means used to verify training was understood by operators. Training summary form showed means used was observation only.
3. The facility did not have documentation of safety procedures or performance evaluations for four contracted service providers [68.87]. The contractors are DoublKold; Pacific CA; Shifflets a-Wenatchee Company and Schmitt Electric, a Wenatchee Company.
4. The facility did not update emergency contact information required within thirty days of the change [68.195(b)]. Jason Stocker, emergency contact name listed on 2018 RMP, left the company two years ago. The Emergency phone number and 24 -hour phone line listed in RMP

dated 17-May-2018 is a non-working number. EPA attempted to dial the 24 -hour phone line on August 8, 2022, and received the non-working status message. Facility follow up email dated August 12, 2022, confirmed that emergency contact person was updated on June 21, 2022.

DOCUMENTS REQUESTED NOT INCLUDED IN REPORT:

The following documents were requested post inspection but are not included in this report. These documents were reviewed to determine compliance with Section 112(r) of the Clean Air Act.

1. Additional training documentation for Honeybear Operators and Maintenance employees who work on ammonia process areas and equipment was requested.
2. Updated information was requested for the emergency contact.

INSPECTION 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:

Terry Garcia

Digitally signed by Terry Garcia
Date: 2022.08.30 12:30:01
-07'00'

Inspector Signature

JAVIER MORALES

Digitally signed by JAVIER
MORALES
Date: 2022.08.30 13:26:54 -07'00'

RMP Coordinator/Approval

ERIN WILLIAMS

Digitally signed by ERIN
WILLIAMS
Date: 2022.08.30 13:06:05 -07'00'

EPCRA Coordinator/Approval

Jennifer A Sullivan

Digitally signed by Jennifer A
Sullivan
Date: 2022.08.30 14:04:05 -07'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: Honeybear Growers
City, State: Brewster, Washington
Lisa Graves

File	Photo Layout ID	Date	Time	Description
DSCN2430	1	5/24/2022	9:33 AM	Common Storage 1 - Entry/Exit
DSCN2431	2	5/24/2022	9:33 AM	Cold Room 18 - Evaporator
DSCN2432	3	5/24/2022	9:33 AM	Cold Room 18 - Evaporator, Sensor Tube
DSCN2433		5/24/2022	9:34 AM	Cold Room 18 - Entry/Exit
DSCN2434	31	5/24/2022	9:35 AM	CA 19 - Entry/Exit "Room Open" Signage
DSCN2435	32	5/24/2022	9:35 AM	CA 20 - Entry/Exit "Do Not Enter" Signage
DSCN2436		5/24/2022	9:36 AM	CA 20 - Entry/Exit "Do Not Enter" Signage
DSCN2437		5/24/2022	9:37 AM	Mezzanine - Corridor
DSCN2438		5/24/2022	9:38 AM	Mezzanine - Ammonia Lines
DSCN2439	6	5/24/2022	9:38 AM	Mezzanine - Ammonia Sensor Network Panel
DSCN2440		5/24/2022	9:38 AM	Mezzanine - Ammonia Sensor Cell
DSCN2441		5/24/2022	9:38 AM	Mezzanine - Ammonia Sensor Network Panel
DSCN2442		5/24/2022	9:39 AM	Mezzanine - Ammonia Sensor Network Panel
DSCN2443		5/24/2022	9:40 AM	Mezzanine - Ammonia Lines
DSCN2444	5	5/24/2022	9:41 AM	Mezzanine - Ammonia Lines
DSCN2445		5/24/2022	9:44 AM	Rooftop - Overview
DSCN2446		5/24/2022	9:44 AM	Rooftop - Overview
DSCN2447	9	5/24/2022	9:44 AM	Rooftop -Pressure Relief Valve Tags
DSCN2448		5/24/2022	9:44 AM	Rooftop -Pressure Relief Valve Tags
DSCN2449	8	5/24/2022	9:44 AM	Rooftop - Overview
DSCN2450	4	5/24/2022	9:47 AM	Mezzanine - Corridor
DSCN2451	7	5/24/2022	9:47 AM	Rooftop - Entry/Exit
DSCN2452		5/24/2022	9:48 AM	Mezzanine - Carbon Scrubbers
DSCN2453	10	5/24/2022	9:51 AM	Common Storage 2 - Entry/Exit
DSCN2454	11	5/24/2022	9:51 AM	Common Storage 2 - Evaporators
DSCN2455		5/24/2022	9:52 AM	Common Storage 2 - Staircase to Mezzanine
DSCN2456	12	5/24/2022	9:53 AM	Common Storage 2 - Evaporators
DSCN2457	13	5/24/2022	9:56 AM	Refrigeration Office - Computer Terminal

File	Photo Layout ID	Date	Time	Description
DSCN2458	14	5/24/2022	9:59 AM	Refrigeration Office - Daily Log
DSCN2459		5/24/2022	9:59 AM	Refrigeration Office - Certificate of Inspection
DSCN2460	15	5/24/2022	10:00 AM	Refrigeration Office - Certificate of Inspection
DSCN2461	16	5/24/2022	10:01 AM	Refrigeration Office - Ammonia Sensor Network Panel
DSCN2462	17	5/24/2022	10:01 AM	Refrigeration Office - Ammonia Sensor Network Panel
DSCN2463		5/24/2022	10:01 AM	Refrigeration Office - Ammonia Sensor Cell
DSCN2464	18	5/24/2022	10:04 AM	Refrigeration Machine Room - Entry/Exit
DSCN2465	19	5/24/2022	10:05 AM	Refrigeration Machine Room - SDS Binder
DSCN2466	20	5/24/2022	10:06 AM	Refrigeration Machine Room - Compressors
DSCN2467		5/24/2022	10:07 AM	Refrigeration Machine Room - Inactive Compressor Flagged
DSCN2468	21	5/24/2022	10:07 AM	Refrigeration Machine Room - Ammonia Leak Detector System
DSCN2469		5/24/2022	10:07 AM	Refrigeration Machine Room - Ammonia Leak Detector System
DSCN2470	22	5/24/2022	10:08 AM	Refrigeration Machine Room - Ammonia Leak Detector System
DSCN2471		5/24/2022	10:08 AM	Refrigeration Machine Room - Alarm
DSCN2472		5/24/2022	10:09 AM	Refrigeration Machine Room - Pressure Relief Valve Tag
DSCN2473		5/24/2022	10:09 AM	Refrigeration Machine Room - Pressure Relief Valve Tag
DSCN2474	25	5/24/2022	10:09 AM	Refrigeration Machine Room - High Pressure Receiver and King Valve
DSCN2475	24	5/24/2022	10:10 AM	Refrigeration Machine Room - High Pressure Receiver
DSCN2476	26	5/24/2022	10:10 AM	Refrigeration Machine Room - Louver Intake
DSCN2477	27	5/24/2022	10:10 AM	Refrigeration Machine Room - Exhaust Fan
DSCN2478	23	5/24/2022	10:11 AM	Refrigeration Machine Room - Pressure Relief Valve Tags
DSCN2479		5/24/2022	10:12 AM	Facility - Forklift Chargers
DSCN2480		5/24/2022	10:13 AM	Facility - Forklift Chargers
DSCN2481		5/24/2022	10:14 AM	Refrigeration Machine Room - Entry/Exit
DSCN2482	28	5/24/2022	10:14 AM	Refrigeration Machine Room - Daily Log
DSCN2483	30	5/24/2022	10:14 AM	Refrigeration Machine Room - Manual Emergency Shutoff
DSCN2484		5/24/2022	10:16 AM	Refrigeration Machine Room - Condensers
DSCN2485	29	5/24/2022	10:16 AM	Refrigeration Machine Room - Condensers and Windsock
DSCN2486		5/24/2022	10:18 AM	Rooftop - Pressure Relief Valve
DSCN2487		5/24/2022	10:20 AM	Facility - Propane Tank
DSCN2488		5/24/2022	10:28 AM	Facility - RMP Executive Summary