

Clean Air Act - Section 112(r) Risk Management Program and EPCRA 312 – Tier II Facility Desk Audit Report

FACILITY INFORMATION:

Name: Americold Woodburn # 80556
Physical Address: 1440 Silverton Road, Woodburn, OR 97071
Phone Number: 971-221-1105
Latitude/Longitude: 45.135301/-122.839200
EPA Facility ID# 100000159375

CONTACT INFORMATION (RMP Implementation):

Name: Jennifer Campbell Sr., West Regional Process Safety Manager
Phone Number: 971-221-1105
E-mail: Jennifer.Campbell@Americold.com

EMERGENCY CONTACT INFORMATION:

Name: Jennifer Campbell
Phone (24-hr): 971-221-1105
E-mail: Jennifer.Campbell@Americold.com
Website: <https://www.americold.com/>

AUDIT DETAILS:

Contact Date: July 22, 2022
Inspectors: Terry Garcia, US EPA Region 10 SEE Grantee, Lead RMP Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: August 20, 1999
Date of Latest Update: June 24, 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.)
1000100960	Nh3 system	1000126416	49312	3	Ammonia, Anhydrous (7664-41-7)	22,800

PURPOSE:

The purpose of this document review 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, and compliance with Section 312 of the Emergency Planning and Community Right to Know Act (EPCRA) which requires the Tier II Chemical Inventory Reports to be submitted annually. EPA Region 10 RMP inspectors did not conduct an onsite inspection due to the COVID risk levels in the RMP facility area.

- The facility has been previously inspected in the past 5 years: No ☒ Yes ☐
If Yes, Date of Last Inspection: last inspected 2015
- Is the emergency contact information current? No ☐ Yes ☒
- 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 ☐

RELEASE/ACCIDENT HISTORY:

Did the facility have a reportable release in the past 5 years? No ☒ Yes ☐

EPCRA TIER II REPORTING:

Did the facility submit their 2021 Tier II report to the SERC? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 2/28/2022

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

If Yes, Date the Tier II was submitted: 2/28/2022

GENERAL INFORMATION:

The facility is regulated under the Risk Management Program as a Program Level 3 process and is owned and operated by Americold Logistics. The Americold, Woodburn (Plant #80556) has been in operations since August 1999. The facility refrigerates a variety of food products in cold storage. The ammonia refrigeration process consists of equipment such as piping, valves, compressors, evaporators, condensers, and pressure vessels. Americold reported an ammonia inventory of 22,800 pounds in their current RMP. There are 15 full-time employees on site. The hours of operation are Monday thru Friday, 8 am to 5 pm. Woodburn Facility is represented by Local Union #324, Tony Scales.

INFORMATION REQUESTED FROM FACILITY:

1. **Process Hazard Analysis** – A copy of the last two PHAs with recommendations and tracking sheets.
2. **Compliance Audit** – A copy of the last two Compliance Audits with recommendations and tracking sheets.
3. **Training** – Training records for each process operator
 - a. **Initial Training Records:** Training in the overview of the process and in the operating procedures, emphasis on the specific safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks.
 - b. **Refresher Training Records:** Training of each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process.
 - c. **Training Documentation:** Records which contains the identity of the employee, the date of training, and the means used to verify that the employee understood the training.
 - d. **Annual Certification:** Annual operating procedures certification and review.
 - e. Fill in **Facility Training Summary** sheet.
4. **Emergency Response** – A copy of emails, letters, or notes on meetings with LEPC and local responders including contact information (individual names, phone numbers, email addresses, organization name), dates, and coordination activities.
5. **Tier II Reporting** - Evidence of submission of a Tier II as described in 40 C.F.R. Part 370 to the State Emergency Response Commission ("SERC"), the Local Emergency Response Commission ("LEPC"), and the fire department with jurisdiction over the facility.

ANALYSIS OF DOCUMENTATION SUBMITTED:

1. **Process Hazard Analysis (PHA):** Americold provided their 2015 PHA (11/16/15 through 11/23/15) and 2020 PHA (11/13/2020, 3/9-3/11/2021) revalidations conducted by Americold personnel. Both PHAs use a What-If/ Check List methodology, have a certification page and list the Americold team members that participated in the PHA revalidation with knowledgeable in the process. All 2015 PHA recommendations and action items are shown as resolved and closed. An updated 2020 PHA recommendations/Action Items Tracking document was provided showing eight action items with a proposed due date of December 31, 2022.
2. **Compliance Audit:** Americold provided their 2019 and 2022 Compliance Audit report for review. The 2019 audit was certified on March 8, 2019, by Jennifer Campbell. The 2022 audit was certified on 7/20/2022 by Jennifer Campbell, Regional PSM Manager. The 2019 audit findings (126) and recommendations (26) are shown as resolved and closed. The 2022 audit findings had 167 closed and 45 open or in progress. In addition, the 2022 audit recommendations has two closed and 44 open or in progress.
3. **Training:**
 - a. Initial Training Records: Americold facility has one operator who is a Permacold contractor. An excel spreadsheet entitled (Ryan Cobb Training Records.xls) was provided for Mr. Cobb, an employee of Permacold that indicates Mr. Cobb has had Ammonia Safety and Health and Safety Awareness Training; However, no documentation was provided to indicate Mr. Cobb has had site specific SOP Training at the Americold Woodburn facility.
 - b. Refresher Training Records: No site-specific SOP Training documentation was provided for Mr. Cobb. In an email dated 8/12/2022 Ms. Campbell indicated that Americold has reached out to Permacold for Mr. Cobb's Training records.
 - c. SOP Annual Certification: Americold facility provided a document entitled 'SOP Certification History Americold Logistics -Americold West (Woodburn, OR)' showing SOP annual certification on entire system for 2019 to 2021. Ms. Campbell confirmed that the 2022 SOP certification has not yet been completed for 2022 and is in progress.
 - d. Facility Training Summary: Americold facility provided a completed copy of the Training Summary form that indicates Mr. Cobb, (Permacold employee) is sole Operator for site
4. **Emergency Response Coordination, ER (Annually after 9/21/18):** Emergency Response documents submitted indicate that future annual coordination intention is to conduct onsite coordination by the facility with local LEPC and Fire in 2022, however the document stated the meeting (scheduled for future date in 2022) is 'tentative' not confirmed. Nothing prior to the date of the inspection was presented that indicates the Americold Woodburn facility has coordinated with the Woodburn LEPC/Fire annually after 2018. The 2022 Compliance Audit has a blank Americold form, which appears to formalize and document the annual ER coordination with local LEPC's as required. No documentation was presented of a completed form, signed by facility personnel and LEPC, Emergency Response representatives that would document prior ER coordination.
5. **Tier II Reporting:** Americold provided the 2021 Tier II report (dated 2/28/22) to EPA for review and a revised report date of 7/26/2022. Revisions made to correct (ammonia quantity) errors discussed during open conference call with EPA on 7/22/2022 and as noted in the 2022 Compliance Audit (reference: 2022 CA 16 Risk Management Plan p. 39/46).

AREAS OF CONCERNS:

1. Americold was unable to provide their annual emergency response coordination documentation required after 9/21/2018.
2. Americold was unable to provide site specific initial and SOP training documentation for the one contracted operator, Ryan Cobb, employed by Permacold.
3. Americold was unable to provide site specific refresher training documentation for Ryan Cobb.
4. Americold's SOP Certification History documents were not consistent in annually certifying operating procedures for refrigeration process equipment. For example, operating procedures for Compressor CP-13, Compressor CP-14, Compressor CP2, Compressor CP3, Evaporators BCAU1 to BCAU5, Ammonia Pump PP1 and Ammonia Pump PP3 were not certified in 2021. Americold provided a 2022 SOP Certification History that certified all operating procedures but does not show a signature by Elliott Cliff.

The findings in this report will be discussed with the facility via telephone and email after certification of this report.

DOCUMENTS REQUESTED ON FOLLOW-UP:

The following documents were requested after the initial submission of documents. These documents were reviewed to determine compliance with Section 112(r) of the Clean Air Act.

1. Clarification on Operator Training.
2. Tracking of PHA and Compliance Audit Actions Items/Recommendations.
3. Training records for Mr. Cobb (Permacold).
4. 2022 Annual SOP certification.
5. Mechanical Integrity (MI) Audit Report for both refrigeration systems (Building 1952 and Building 1979) including tracking report of any findings.

AUDIT 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:

Signature	Date
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RMP Coordinator/Approval	Date
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EPCRA Coordinator/Approval	Date
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Land Enforcement Section Chief/Approval	Date
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