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:	Frosty Packing Co., LLC
Physical Address:	2820 River Road, Yakima, WA 98902
Phone Number:	509-245-5231
Latitude/Longitude:	46.616892 / -120.546406
RMP Facility ID#	100000200203
FRS ID#:	110015562764
EJ Concerns:	Yes (Above 80%)

CONTACT INFORMATION (RMP Implementation):

Name:	Stanley Bostrom
Phone Number:	509-248-5231
E-mail:	sbostrom@jackfrostfruit.com

EMERGENCY CONTACT INFORMATION:

Name:	Paul Martinez
Phone (24-hr):	509-961-4909
E-mail:	paulm@jackfrostfruit.com

TRIP DETAILS:

Inspection Date:	4/26/2022
Inspection Time:	0900 hours through 1145 hours
Inspectors:	Bob Hales, 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: October 1, 2007
Date of Latest Update: January 1, 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)
1000084534	Anhydrous Ammonia	1000105522	42448	3	Ammonia, Anhydrous (7664-41-7)	17,883

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 2022 Tier II report to the SERC? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: 2/24/2022
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: 2/24/2022

INSPECTION ENTRY:
Bob Hales led the inspection entry. The inspection team met with Stanley Bostrom at the Frosty Packing Co., LLC facility in Yakima, Washington. The EPA Inspection Team arrived at the facility at 0900 hours and was joined by the following facility personnel:

Name	Title
Stanley Bostrom	CFO
Mike Davis	Ammonia Compliance
Carol Davis	Ammonia Compliance
Vickie Silva	Food Safety Manager

Eddie Medino	Refrigeration Operator
Paul Martinez	Managing Partner

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: Yakima City Fire Department

The inspection team was escorted to a conference room located in the facility's office building. Introductions were made by Bob Hales, 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. Stanley Bostrom 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: Vickie Silva, Food Safety Manager

<u>GENERAL INFORMATION</u>:

The facility is regulated under the Risk Management Program as a Program Level 3 facility and is owned and operated by Frosty Packing Co., LLC (Frosty Packing Co., formerly Jack Frost Fruit Co.). The facility operates as an apple packing and refrigeration warehouse throughout the year, and employs an ammonia refrigeration system. There are 230 full-time employees on site, two of whom are responsible for the oversight of refrigeration operations.

Frosty Packing Co. (the facility) packages and stores apples in refrigerated rooms while the produce awaits shipment. Designated Refrigeration Operators check the ammonia system each operating workday, and all refrigerated areas are continuously monitored by an ammonia leak detection system. A computer system remotely notifies the Refrigeration Operators when an alarm is triggered, or when 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, and all employees participate in an annual training and drill for the EAP.

ON-SITE OBSERVATIONS:
The facility tour was conducted from approximately 0915 hours to 1015 hours. The EPA Inspection Team was escorted by facility representatives Mike Davis, Vickie Silva, and Eddie Medino. EPA observed the single mechanical room supporting the facility ammonia refrigeration system (Mechanical Room #1), the Vessel Room, two cold storage rooms (Cold Storage Room 1A and Cold Storage Room 2A), and two controlled atmosphere rooms (Controlled Atmosphere Room 1 and Controlled Atmosphere Room 19).

The condenser units of the facility refrigeration system are located on the building rooftop of the South Complex (Photo 1). Mechanical Room #1 serves as the sole engine room for the facility's refrigeration system (Photos 2-9), and houses primary system components including compressors, regulator valves, exhaust fans, intake vents, and an ammonia leak detection device. A dedicated room identified as the Vessel Room houses one high pressure receiver (HPR) tank with an associated king valve, and an ammonia leak detection device (Photos 24-26). An office adjacent to the Vessel Room houses a computer terminal and an ammonia sensor network panel (Photos 20-23) that allow facility personnel to monitor all facility refrigeration equipment parameters.

EPA inspected Cold Storage Room 1A (Photos 13 and 14), Cold Storage Room 2A (Photos 10-12), Controlled Atmosphere Room 1 (Photos 18 and 19) and Controlled Atmosphere Room 19 (Photos 15-17). The primary equipment observed in each of these rooms include an evaporator, an ammonia sensor intake, and an ammonia leak detection device. EPA observed the facility ammonia refrigeration equipment as clearly labeled and tagged, with appropriate safety features in place. 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 facility, the inspection team returned to the conference room to review the pertinent RMP documentation. Upon completion of the document review, EPA provided a debriefing to Stanley Bostrom, Mike Davis, Carol Davis, Vickie Silva, Eddie Medino, and Paul Martinez.

INFORMATION COLLECTED FROM FACILITY:

1. List of PHA Audit Team Members

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

1. Some pressure relief valves (PRVs) were identified as past due for replacement in Machine Room #1. The facility was aware of this issue and were ordering new PRV replacements for installation. [68.73(d)(3)].
2. The facility Process Hazard Analysis (PHA) documentation from November 2017 provided a recommendation on the replacement of all galvanized pipes for release valves. The recommendation stated "not applicable" without providing the reason why this recommendation was declined. [68.67].

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.

All documents requested from the inspection were reviewed on site or are included in this report.

INSPECTION REPORT CERTIFICATION:
This is to certify that I, Bob Hales, was the lead inspector at this facility and that I have verified the accuracy of the observations in this inspection report:

JAVIER MORALES Digitally signed by JAVIER MORALES Date: 2022.08.05 11:58:50 -07'00' For

Inspector Signature

JAVIER MORALES Digitally signed by JAVIER MORALES Date: 2022.08.05 12:00:10 -07'00'

RMP Coordinator/Approval

ERIN WILLIAMS Digitally signed by ERIN WILLIAMS Date: 2022.08.18 14:05:34 -07'00'

EPCRA Coordinator/Approval

Jennifer A Sullivan Digitally signed by Jennifer A Sullivan Date: 2022.08.18 14:46:31 -07'00'

Land Enforcement Section Chief/Approval