# U.S. ENVIRONMENTAL PROTECTION AGENCY

## REGION 1 – NEW ENGLAND

## 5 POST OFFICE SQUARE, SUITE 100

## BOSTON, MASSACHUSETTS 02109-3912

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

**HP Hood LLC**
**219 Allen Street**
**Barre, VT 05461**

6/11/2024

Date of Inspection

Waste and Chemical Compliance Section

7/26/2024

O'Donnell, Mary Jane Digitally signed by O'Donnell, Mary Jane Date: 2024.07.26 13:41:54 -04'00'

Date Inspection Report Approved

Mary Jane O'Donnell, Manager

Waste and Chemical Compliance Section

7/26/2024

Date Inspection Report Finalized

7/26/2024

Date Inspection Report Transmitted to Facility

***Disclaimer: Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.***

**Date:** July 26, 2024

**From:** Aaron Gilbert, Leonard Wallace IV, and Andrew Meyer, 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)(1) General Duty Clause and Emergency Planning and Community Right-To-Know Act (EPCRA) Sections 302-312, and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 103 of HP Hood in Barre, Vermont.

## I. GENERAL INFORMATION

| | |
|---|---|
| Facility Name: | HP Hood LLC |
| Dun and Bradstreet Number: | 78-101-4498 |
| RMP Number: | N/A; General Duty Clause (GDC) Facility |
| Address: | 219 Allen Street<br>Barre, VT, 05641 |
| Inspector Names: | Leonard B. Wallace, IV, U.S. Environmental Protection Agency (U.S. EPA) Region 1<br>Andrew Meyer, U.S. EPA Region 1<br>Aaron Gilbert, U.S. EPA Region 1<br>Mark Briggs, Eastern Research Group, Inc. (ERG) |
| Inspection Date: | June 11, 2024 |
| Type of Inspection: | CAA § 112(r)(1), CERCLA § 103, and EPCRA §§ 302-313 Compliance Evaluation Inspection |
| Purpose of Inspection: | This inspection was conducted as a routine EPA CAA § 112(r)(1) General Duty Clause/EPCRA compliance evaluation inspection. HP Hood in Barre, Vermont (VT) was selected for inspection because it is a stationary source having an anhydrous ammonia refrigeration system onsite that had not been historically inspected by U.S. EPA Region 1. |
| Current Owner: | HP Hood, LLC |
| Current Operator: | HP Hood, LLC |
| Primary NAICS codes: | 311511 (Fluid Milk Manufacturing) |
| Number of full-time employees (FTEs): | 75 |
| Estimated Annual Sales: | Facility location unknown ($2.21 billion parent) |

Parent Corporation: HP Hood, LLC

## II. GENERAL FACILITY DESCRIPTION

HP Hood, LLC in Barre, VT (HP Hood or the Facility) produces approximately 40,000 gallons per day of containerized fluid milk for distribution to groceries in the New England market. Raw milk is received by truck daily from local dairies and stored in tanks (silos) until pasteurization and bottling. HP Hood also produces low-fat milk at the facility by removing butterfat from whole milk. The Facility also bottles between 25,000 and 30,000 gallons per day of spring water for distribution to local groceries. No bottle manufacturing for either fluid milk or spring water takes place at the Facility. The Facility consists of approximately 60,000 square feet of manufacturing, warehousing, and refrigerated loading dock space in addition to an excess equipment storge barn, truck maintenance shop, and wash bay. The Facility has approximately 75 full time employees. There is no labor union at the facility.

The Facility has one employee on-site who monitors the ammonia refrigeration system which is operated by Miller Refrigeration. The ammonia refrigeration system was installed in 2001 and includes an ammonia machinery room (AMR) space within the milk processing area for two (2) compressors, two pressure vessels, and associated ammonia piping. Ammonia piping and a condenser are located on the roof. The system reportedly contains 410 pounds of anhydrous ammonia according to the Facility's reporting year (RY) 2021 EPCRA Tier II report. The facility representatives stated there have been no fires or ammonia releases in the past 5 years.

The Facility is located in a primarily agricultural area near Barre, VT. Residential areas are located approximately 0.5 miles to the southeast of the Facility and commercial areas are located approximately 0.5 miles to the northeast of the Facility. Attachment 1 includes a GoogleEarth® aerial photograph of the HP Hood facility located in Barre, VT.

## III. IN-BRIEF/OPENING CONFERENCE

The U.S. EPA inspection team including Leonard Wallace, IV, Andrew Meyer, Aaron Gilbert and Mark Briggs (U.S. EPA contractor inspector) entered the Facility at approximately 9:00 AM EST. The U.S. EPA inspection team was supported Will Schwragz, State of Vermont Hazardous Materials Response Team.

The U.S. EPA inspection team presented identification to Michael Anderson, Director of Operations for HP Hood's Barre, VT facility and 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. Anderson, who signed as the Recipient of the Notice. Mr. Anderson 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 1** participated in the on-site inspection:

**Table 1. Facility Representatives:**

| Name | Title/Company | Phone Number | E-mail |
|---|---|---|---|
| Michael Anderson | Director of Operations, HP Hood | (603) 410-1005 | Michael.Anderson@hphood.com |
| Remi Fleuette | Director Environmental, Health and Safety, HP Hood | (603) 568-9436 | Remi.Fleuette@hphood.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. CAMEO Chemicals software. Explained the mobile app and the desktop program formats can be used offline, and the desktop program can share information with other CAMEO suite programs.

Inspector Wallace stated that after the opening meeting, the inspectors would do a walk-through inspection of the outdoor chemical storage area, the manufacturing processes where chemicals are used, and all indoor areas where chemicals are stored. 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 Facility:

1. Building Exterior
2. Storage Barn
3. Penske Truck Maintenance Shop
4. Ammonia Machinery Room
5. Roof Areas
6. Chemical Storage Room
7. Old Wash Bay

Inspector Wallace took a total of 182 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 (AOCs) identified in each of the areas during the physical inspection.

Building Exterior

The building exterior is metal frame construction with a small parking area in the front. A truck entrance to the loading dock is located at the south side of the facility as well as a truck refueling station. First responders would likely enter the building through the front. The remaining portions of the building are surrounded by an access road and trailer storage. An inspection of the building exterior resulted in the following AOCs:

- Windsocks were not visible from all areas approaching or exiting the Facility (see photographs P1150473, P1150478 and P1150523).

- National Fire Protection Association (NFPA) diamonds were not on the entry doors to the facility where emergency responders would enter if an ammonia release were to occur. (see photographs P1150473, 1150471, and 1150487).

- There was no audible/visual ammonia alarm located outside the main entrance to the building to warn those entering that an ammonia release is occurring (see photograph P1150472).

- Two propane tanks were less than five (5) feet from the cigarette butt receptacle and AC compressor, which are both potential ignition sources. Mulch was also present around the base of the propane tanks (see photograph P1150467).

- There was no read out panel for the ammonia detectors provided near the main fire alarm control panel at the front of the building (see photographs P1150467 and P1150472).

- An electrical transformer in front of the building did not contain a label indicating if transformer oils contain polychlorinated biphenyls (PCBs) (see photographs P1150474, P1150475 and P1150476).

- Electrical wires located exterior to the Facility were not being properly protected from being damaged (see photographs P1150470, P115047, P1150488, and P1150487).

- A storm drain in the parking lot near the truck fuel pumps leads across street (see photographs P1150481).

- A storage container located adjacent to the loading docks was not labeled regarding its contents (see photographs P1150487 and P1150488).

- Freon containing air handling units and associated piping were not labeled regarding their contents or direction of flow (see photographs P1150528 and P1150529).

- A water hose was located between two electrical shutoff boxes on the wall behind two freon air handling units (see photograph P1150530).

- Combustible materials (wooden pallets) was being stored below an exit stairway from the loading dock area (see photograph P1150525).

- The 1,000-gallon propane storge tank was not affixed with a NFPA diamond (see photograph P1150543).

- The 1,000-gallon propane storage tank was not anchored to the concrete pad (see photographs P1150544 and P1150545).

- The concrete blocks in front of the propane tank were not anchored (see photographs P1150543, P1150544 and P1150545).

- The 1,000-gallon propane storage tank installed in 2006 has visible surface corrosion (see photograph P1150546).

- The underground storage tank (UST) storing heating oil and the associated access hatch were not marked as confined spaces (see photograph P1150548).

- The glycol chiller and associated piping were not labeled with the contents or direction of flow (see photographs P1150449 and P1150550).

- Wood was stored next to egress stairs and the side of the Truck Maintenance Shop building outside wall (see photographs P1150525 and P1150531).

Storage Barn

The Facility uses an on-site storage barn to store excess equipment and chemicals. Chemicals, primarily in 55-gallon drums, are actively stored on the main floor of the barn. Other equipment including spent batteries, paints, and oils are also stored on the main floor of the barn. The second floor of the barn is an open space and includes a small amount of equipment. An inspection of the storage barn resulted in the following AOCs:

- No NFPA diamonds were present on any of the entry doors into the storage barn (see photographs P1150489 and P1150495).

- Drums of chemicals were not stored in secondary containment (see photographs P1150499, P1150500, P1150501 and P1150502, P1150503 and P1150504).

- Lead Acid batteries were not on the EPCRA Tier II report, not labeled as Universal Waste batteries, not dated, and not stored within any secondary containment structure (see photographs P1150508, P1150509, P1150510 and P1150511).

- Spent fluorescent lamps were not being properly stored in dated, closed containers and labeled as Universal Waste lamps (see photograph P1150512). Facility contacts were unable to determine how long the waste lamps had been in storage.

- Full 55-gallon drums did not have labels to indicate their content (see photograph P1150503). A one-gallon container of liquid was also present in the barn and was not labeled regarding its contents (see photograph P1150514).

- Manways from the upper portion of the storage barn had open hatches that were not provided with fall protection (see photographs P1150519 and P1150520).

- Possible Resource Conservation and Recovery Act (RCRA) wastes including waste paint and aerosol cans were not labeled and dated and were not actively stored within secondary containment (see photograph P1150505).

- Road salt and sand in a shed adjacent to the storage barn were not included on the EPCRA Tier II report (see photographs P1150490, P1150491, P1150492, P1150493, and P1150494)

Penske Truck Maintenance Shop

The Facility has a truck maintenance shop on-site operated by Penske to maintain both trucks and trailers used for hauling milk and milk products. The Penske Truck shop provides vehicle fluid changes, regular engine maintenance, and truck brake repair services. An inspection of the Penske Truck Maintenance Ship resulted in the following AOCs:

- Drums of oils were not actively stored within secondary containment (see photographs P1150532, and P1150535).

- The windshield fluid tank was not labeled to indicate its contents and is not in secondary containment (see photograph P1150533).

- The diesel exhaust fluid (DEF) tank was not in secondary containment and had no confined space signage. The pipe at the top of the tank was not capped and material is building up at the end of the pipe (see photograph P1150534).

- Lead acid batteries were not properly stored and not labeled to determine which batteries are new from those that are spent and considered Universal Waste. In addition, the batteries were not listed on the FY21 EPCRA Tier II report. (see photograph P1150532).

- The emergency eyewash stations was blocked, damaged and not cleaned. No safety showers were associated with the eyewash stations (see photographs P1150535 and P1150537).

- Eye Wash stations was covered and not setup to be hands-free. There were no combination emergency eyewash and shower units in the area (see photographs P1150535, P1150536, and P1150541).

- The flammable storage cabinet was not electrically grounded (see photographs P1150538 and P1150539).

- Equipment was being stored within 36 inches of the front of an electrical panel (see photograph P1150540).

- The parts washer system and associated chemical storage drum were not listed on the EPCRA Tier II report (see photograph P1150541).

Ammonia Machinery Room

The Facility operates one AMR that is in a space shared by milk processing equipment. No exits from the AMR lead to the exterior of the building. The AMR houses two ammonia compressors, small pressure vessels above the compressors, ammonia piping, and an ammonia filled plate-and-frame heat exchanger. An inspection of the AMR resulted in the following AOCs:

- The AMR was not separated by tight fitting construction from the processing areas (see photographs P1150554 and P1150555).

- The entry door into the AMR was not tight fitting at the hinges (see photograph P1150552).

- The entry door into the AMR was not affixed with signage indicating access was restricted to authorized personnel only (see photograph P1150552).

- Ammonia audible/visual alarms was not adjacent to the entry doors into the AMR (see photographs P110553, P1150580, P1150583, and P1150622).

- No audible/visual ammonia alarms were inside the AMR.

- No Piping and Instrumentation Diagrams (P&IDs) showing critical valves to be used in emergency and no emergency shut down procedures was posted outside the primary AMR entry door (see photograph P1150552).

- There was no emergency contact list posted outside the primary AMR entry door (see photograph P1150552).

- There was no signage posted outside or inside the AMR indicating who installed the system, the pressure test before filling the system, the coolant type and amount, and the oil type and amount in the ammonia system.

- There was no emergency stop switch (E-stop) located immediately outside the entry door to the AMR (see photographs P1150552 and P1150580). The E-stop was in a separate room and no information on it location for first responders (see photographs P1150624 and P1150626).

- There was no switch for emergency ventilation located outside the AMR.

- There were King Valve signs at each of the two compressors and the valves at the compressor was not easily accessible (see photograph P1150556 and P1150559).

- Pressure vessels inside the AMR and above the condensers were not labeled regarding their function (see photographs P1150558, P1150561 and P1150562).

- There were pipes supporting pipes in the AMR (see photographs P1150559, P1150560 and P1150561).

- Not all ammonia piping were properly labeled or have the proper label on them AMR (see photographs P1150558, P1150559, and P1150560).

- The facility used multiple paint colors on the ammonia piping and tanks inside the AMR and on the roof (see photographs P1150556, P1150557, P1150558, P1150561, P1150566, P1150606, and P1150613).

- No air intake was provided to the space around compressors to provide make-up air to the ventilation system (see photographs P1150557 and P1150558).

- Inspectors observed significant vibration on piping connected to Compressor #2 (see Video).

- The air vent from the AMR was in the ceiling (see photographs P1150560 and P1150561).

- The exit doors from the AMR were not equipped with panic hardware (see photographs P1150562 and P1150563).

- The door exiting to the roof from the AMR did not have swing in the direction of egress (see photograph P1150563 and P1150622).

- The AMR door and area around the door did not have a sign stating, “REFRIGERATION MACHINERY ROOM AUTHORIZED PERSONNEL ONLY” (see photograph P1150552).

- Pipe penetrations into the AMR from the cleaning chemical storage area were not tight-fitting (see photographs P1150577 and P1150579).

- Pipe penetrations from the AMR to the mezzanine area above the AMR were not tight fitting (see photograph P1150585 and P1150598).

- There was no emergency safety shower and eyewash station located immediately outside the AMR (see photographs P1150580, P1150581 and P1150583).

- The ammonia detector read outs were located outside the AMR in an adjacent cleaning chemical dispensing room (see photographs P1150582, P1150627, P1150678, P1150629, and P1150630).

- Inside the AMR milk production operations were being (see photographs P1150554 and P115055).

Roof Areas

Ammonia refrigeration equipment on the roof of HP Hood includes an ammonia condenser, ammonia accumulator, and ammonia piping. Ammonia piping transfers vapor and liquid ammonia between the condenser, accumulator, plate and frame heat exchanger and the compressors. An inspection of the roof areas resulted in the following AOCs:

- There was no emergency safety shower and eyewash station on the roof.

- The ventilation from the AMR discharged horizontally through the side of the wall and below the ammonia accumulator on the roof (see photographs P1150595 and P1150612).

- Pressure relief valve (PRV) piping adjacent to the condenser on the roof was routed in a downward direction before joining to the vertical relief header (see photographs P1150604 and P1150605).

- The ammonia pressure relief vent pipe may not have been 7.25 ft above surrounding working surfaces. Unable to verify if the ammonia pressure relief vent pipe had a trap or drain for rain, snow or ice going down the pipe (see photographs P1150601 and P1150618 ).

- Surface corrosion was present at the interface between ammonia piping and ammonia piping supports on the roof of the building (see photographs P1150604, P1150605 and P1150612).

- Vapor barriers on the ammonia accumulator located on the roof was damaged (see photographs P1150607, P1150614 and 0554 and P1140556).

- The entry door to the AMR from the roof was not affixed with an NFPA diamond to indicate the chemical hazards inside (see photograph P1150622).

- No confined space signage on the condenser (see photographs P1150602 and P1150606).

- Only one egress way off the roof.

Chemical Storage Room

A chemical storage room is located in a space adjacent to the AMR, processing area and cleaning chemical dispensing room. The chemical storage room includes tankage, 55-gallon drums of chemicals and a water softening system used to treat water used in milk bottling operations. An inspection of the chemical storage room resulted in the following AOCs:

- Tank Number 3 was not labeled as a "Confined Space" and the tank was not equipped with a lid. Inspectors observed that Tank Number 3 contained Solar Salt used in the water treatment system (see photograph P1150591).

- Cleaning chemicals containing nitric acid had not been accounted for on the EPCRA Tier II report (see photograph P1150572 and P1150637).

- Drums of a cleaning chemicals with pumps attached do not have a tight-sealing bungs to prevent spills (see photographs P1150573 and P1150576).

- A 55-gallon drum of flammable isopropyl alcohol was being stored in the cleaning chemical area (see photographs P1150592 and P1150593). The drum of isopropyl alcohol was not included on the EPCRA Tier II report. The facility representative stated the isopropyl alcohol was no longer being used.

- The ammonia detection read out was mounted on the wall inside the chemical pump room (see photographs P1150582, P1150583, P1150602, P1150628, P1150529, and P1150630).

Old Wash Bay

The Facility has on outer building called the Old Wash Bay for storage of incoming cleaning chemicals, oils, propane cylinders, propane powered lift trucks, and excess equipment. An inspection of the Old Wash Bay resulted in the following AOCs:

- The entry doors to the old wash bay was not affixed with an NFPA diamond to indicate the hazards of the chemicals being stored (see photograph P1150631).

- Acid and base chemicals were being stored next to each other without secondary containment (see photographs P1150636, 1150637, and 1150638).

- Chemicals being stored in the old wash bay were not in secondary containment (see photographs P1150632, 1150634, 1150635, 1150636 and 1150639).

- A tote of an oxidizing cleaning chemical (Oxonia Active) in the Old Wash Bay is being incompatibly stored adjacent to combustible materials including oils in the wash bay (see photographs P1150640 and P1150641, P1150642, P1150643 and P1150644).

- A waste oil tank was observed in the old wash bay room (see photograph P1150643). The tank did not have labeling to indicate its contents nor an NFPA diamond to indicate the hazards.

- Two compressed gas cylinders were not adequately supported to prevent them from falling over in the old wash bay (see photograph P1150647).

- The storage cage for propane cylinders in the old wash bay were not affixed with an NFPA diamond or identify the contents of the cylinders (see photograph P1150647).

- Empty and full propane cylinders inside the storage cage in the old wash bay were not identified as either empty or full.

## V. OUT-BRIEF/CLOSING CONFERENCE

An in-person out-brief/closing conference was not conducted at the conclusion of the onsite inspection. Inspector Wallace emailed a copy of the EPA inspection teams' preliminary areas of concern identified during the inspection on to Michael R. Anderson, Director Operation Fluid Milk on June 26, 2024. The inspection team met virtually over Teams Meeting with representatives from HP Hood on July 1, 2024, at 1:00 PM EST to review the preliminary observations, discuss additional document requests, and explain the next steps in the enforcement process.

## 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? **Yes, Ammonia and Sulfuric Acid**

(2) List or obtain documentation: **Requested**

(3) How was maximum quantity on-site determined or calculated? **Container size and number of containers.**

**EPCRA Section 303**

(1) Facility Coordinator identified per Sec. 303 and date LEPC was notified? **Unknown**

**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 SDS chemicals on-site and to determine if 500 lb./10,000 lb./TPQ thresholds were exceeded? **No – Nitric acid (EHS) in a cleaning solution is not included on the EPCRA Tier II report, parts wash solvent is not included on the EPCRA Tier II report, salt and sand is not included on the EPCRA Tier II report, isopropyl alcohol is not included on the Tier II report, and some lead acid batteries were not included on the EPCRA Tier II report.**

(3) List of OSHA chemicals manufactured, processed, used/stored, and obtained? **No**

(4) How were the maximum amounts determined? **Container size and number of containers.**

(5) Section 311 info supplied to the:

SERC (Y/N): **Yes**
LEPC (Y/N): **Unknown**
Local Fire Department(Y/N): **Unknown**
Date: **Unknown**
Chemical List: **Unknown**
SDSs: **Unknown**

(6) Have any new hazardous chemicals, mixtures, or substances been introduced into the Facility in the last 5 years? **Unknown**

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

**EPCRA Section 312** (due March 1 of year following reporting calendar year)

(1) Was Tier II form submitted for all required chemicals? **No, EPCRA Tier II was submitted but did not include all chemicals above the Vermont thresholds.**

(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? **Yes**

(4) Had the Facility completed and signed a list of all reportable chemicals on site on date of the inspection? **Requested**

**(5) Table of EPCRA 312 Reportable Substances:**

| CAS # | Chemical[1] | Approx. Max. Wt. on Site (Lbs.) | TPQ (Lbs.)[2] | Approx. Ratio (Actual/TPQ) |
|---|---|---|---|---|
| NA | AC-103 | 17,037 | 100 | 170.4 |
| 74-86-2 | Acetylene | 300 | 100 | 3.0 |
| 7664-41-7 | Anhydrous Ammonia | 410 | 100 | 4.1 |
| NA | Enforce | 974 | 100 | 9.7 |
| NA | Envirocid | 2,116 | 100 | 21.2 |
| 107-21-1 | Ethylene Glycol | 1,114 | 100 | 11.1 |

| CAS # | Chemical[1] | Approx. Max. Wt. on Site (Lbs.) | TPQ (Lbs.)[2] | Approx. Ratio (Actual/TPQ) |
|---|---|---|---|---|
| NA | Excelerate CIP | 12,987 | 100 | 129.9 |
| NA | Lead-Acid Batteries (Sulfuric Acid) | 14,000 | 100 | 140 |
| NA | Lead-Acid Batteries (Lead) | 14,000 | 100 | 140 |
| NA | Lift III | 971 | 100 | 9.7 |
| NA | Liquid K | 943 | 100 | 9.4 |
| 64742-53-6 | Mineral Oil Dielectric Fluid | 1,292 | 100 | 12.9 |
| NA | Motor Oil | 3,753 | 100 | 37.5 |
| 68476-30-2 | No. 2 Fuel Oil | 51,760 | 10,000 | 5.2 |
| NA | Oxonia Active | 5,604 | 100 | 56 |
| 7782-44-7 | Oxygen | 480 | 100 | 4.8 |
| 74-98-6 | Propane | 8,905 | 10,000 | 0.9 |
| NA | Sani-Glide | 12,123 | 100 | 121.2 |
| 7647-14-5 | Solar Salt | 32,400 | 100 | 324 |
| NA | Ster-Bac | 456 | 100 | 4.6 |
| NA | TerraCair Ultrapure Diesel Exhaust Fluid | 4,909 | 100 | 49.1 |
| 68476-34-6 | Ultra-Low Sulfur Diesel Fuel | 64,530 | 10,000 | 6.4 |
| NA | Waste Oil | 2,265 | 100 | 22.7 |

1. Data from RY 2021 EPCRA Tier II Report
2. Vermont Department of Public Safety, "Typical chemicals that need to be reported and the reporting threshold".

## VII. ENFORCEMENT HISTORY

Review of EPA's ECHO database from June 2021 to June 2024 indicates the HP Hood facility has not had any violations.

## VIII. ENVIRONMENTAL JUSTICE

According to EPA's Environmental Justice Screening and Mapping Tool (EJ Screen), HP Hood is located in an environmental justice area. The supplemental EJ indicators are greater than 90% of the State average within a 1-mile radius of the facility for criteria such as diesel particulate matter, air toxics cancer risk, underground storage tanks, RMP facilities, and proximity to hazardous waste.

## Appendix A. Google Earth Image of the HP Hood Facility in Barre, Vermont