

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

FACILITY INFORMATION:

Name: US Foods, Inc. – Woodburn, OR
Physical Address: 350 South Pacific Highway
Woodburn, Oregon 97071
Phone Number: (503) 980-2730
Latitude/Longitude: 45.130833, -122.844722
EPA Facility ID# 1000 0011 3218

CONTACT INFORMATION (RMP Implementation):

Name: Ron Loving, Facilities Manager
Phone Number: (503) 980-2730
E-mail: ronald.loving@usfoods.com

EMERGENCY CONTACT INFORMATION:

Name: Ron Loving
Phone (24-hr): (503) 278-1748
E-mail: ronald.loving@usfoods.com
Website: www.usfoods.com

AUDIT DETAILS:

Contact Date: July 25, 2022
Inspector: Edward Johannes, US EPA Region 10 SEE Grantee, Lead RMP Inspector (in Training)

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: June 22, 1999
Date of Latest Update: June 14, 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)
1000100529	Refrigeration System	1000125898	42441	3	Ammonia, Anhydrous (7664-41-7)	30,081

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 are conducting offsite compliance monitoring when warranted for the RMP facility.

- The facility has been previously inspected in the past 5 years: No ☒ Yes ☐
If Yes, Date of Last Inspection:
- 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 ☐

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

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

GENERAL INFORMATION:

The facility is regulated under the Risk Management Program as a Program Level 3 process and is owned and operated by US Foods, Inc. This facility started operation in 1993 as Agripac, Inc. Plant 8. US Foods Woodburn facility is a cold storage and distribution center for fresh and frozen food. The facility has a freezer and chill coolers that use an anhydrous ammonia as refrigerant in a closed-looped system. There are 350 full-time employees on site.

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 Committee (LEPC), and the fire department (FD) with jurisdiction over the facility.

ANALYSIS OF DOCUMENTATION SUBMITTED:

1. **Process Hazard Analysis:** US Foods provided the facilities 2014 and 2019 PHA that were conducted for the anhydrous ammonia refrigeration system. Both reports were prepared by iWorkWise for Food Services of America, the previous owner of the facility. Both PHAs use the What If/Checklist methodology. The 2014 PHA identified forty-nine (49) findings and recommendations. Six findings were carryovers from the 2009 PHA. All findings and recommendations were resolved with actions taken and dates completed. The 2019 PHA identified thirty (30) findings and recommendations. All findings and recommendations were resolved with actions taken and dates completed in the 2019 PHA report.
2. **Compliance Audit:** The facility provided their 2019 and 2022 Compliance Audit reports. Both audits used a Program 3 checklist for the anhydrous ammonia refrigeration system. A 2019 Compliance Audit was conducted by iWorkWise for Food Services of America from April 22 to 25, 2019. The 2019 audit identified nineteen (19) findings that were all completed on December 30, 2019. A 2022 Compliance Audit was conducted by US Foods, Inc. on April 13, 2022, and identified twenty-six (26) findings. Four findings still remain open.
3. **Training:** US Foods Woodburn facility provided a completed Training Summary filled out by Ronald Loving, Fleet and Facility Manager for two operators, LeRoy Davidson and Ernie Hayden, of the anhydrous ammonia refrigeration process. The operator's names, the dates of initial and refresher training, and verification means for training are listed in the table below. Initial Training Records were provided for both operators showing a list of subjects covered, date completed, supervisor's, and operator's initials. The refresher training records are entered into a APSM program. This program shows the name of the operator and the training module completed by them and the supervisor who certified that they passed each training module. This program does not allow for either wet or electronic signatures to be recorded for each completed training module from the operators and supervisor. RETA training certificate for Ernie Hayden is valid thru June 2023. No additional training certificates were supplied for LeRoy Davidson. A SOP Training Certification Summary with a date of August 18, 2022, was supplied for Ronald Loving, LeRoy Davidson, and Ernie Hayden. It included system being certified on, person being certified, and date certified. A SOP Certification History document was also supplied addressing the annual certification of operating procedures with one-hundred five (105) items listed to be certified. Twenty-five (25) of the operating procedures were not certified in 2022.

Employee Name	Initial SOP Training Date	Last SOP Refresher Training Date	Verification Means
LeRoy Davidson	3/11/2019	7/20/2022	Class, observation, test, certification
Ernie Hayden	4/21/2014	8/9/2021	Class, observation, test, certification

4. **Emergency Response Coordination (Annually after 9/21/18):** The facility provided a 2022 Annual Outreach Participation Sheet signed by members of the Woodburn FD that inspected the facility on May 17 and 18, 2022. The Annual Outreach Participation Sheet did not include phone numbers or emails addresses of the participating individuals. They also provided an Emergency Response Annual Documentation showing they had an annual outreach walkthrough

inspection in the riser rooms, outside areas, and general areas conducted by the Woodburn FD fire marshal on March 28, 2022. No notes on meetings, coordination activities, or contact with the LEPC were provided by the facility.

5. **Tier II Reporting:** US Foods Woodburn submitted their 2021 Tier II on January 27, 2022, to the Oregon SERC. In Oregon the SERC automatically submits the Tier IIs to the appropriate LEPC and FD. For this facility the LEPC is Marion County Emergency Management, Salem, Oregon, and the FD is Woodburn Fire District, Woodburn, Oregon. The following is a list and amount of Hazardous or Extremely Hazardous Substances over threshold reporting quantity reported on-site by the facility on their 2021 Tier II.

Chemical Name	CAS Number	Amount (in lbs)
Anhydrous Ammonia	007664-41-7	30,080
Diesel Fuel low & high sulfur	068476-34-6	105,000
Sulfuric Acid (lead acid batteries)	007664-93-9	270,400

AREAS OF CONCERNS:

1. The US Foods, Inc. Woodburn facility operator training records are entered into a APSM program. This program does not allow for either wet or electronic signatures to be recorded for each completed training module from the operators and supervisors.
2. The US Foods, Inc. Woodburn facility did not perform annual emergency response coordination activities. [68.93]. US Foods, Inc. could not produce documentation that emergency response coordination activities were done prior to 2022. This requirement has been in effect since September 21, 2018.
3. The US Foods, Inc. Woodburn SOP Certification History document showed that twenty-five (25) of the operating procedures were not certified in 2022 [68.69(c)].

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. Refresher Training Records.

AUDIT REPORT CERTIFICATION:

This is to certify that I, Edward Johannes, was the lead inspector at this facility and that I have verified the accuracy of the observations in this inspection report:

Signature

Date

RMP Coordinator/Approval

Date

EPCRA Coordinator/Approval

Date

Land Enforcement Section Chief/Approval

Date