



**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: Freeze Pack Inc., Oregon Potato Company
Physical Address: 302 North Venture Road, Pasco, WA 99301
Phone Number: (509) 545-4545
Latitude/Longitude: 46.235270/-119.046150
RMP Facility ID#: 1000 0020 4673
FRS ID#: 110036126563
EJ Concerns: Yes (84%)

CONTACT INFORMATION (RMP Implementation):

Name: Steve Harris, Plant Manager
Phone Number: (509) 303-8244
E-mail: steve.harris@pascoprocessing.com

EMERGENCY CONTACT INFORMATION:

Name: Yuvani Noriz, Refrigeration Manager
Phone (24-hr): (509) 303-8244
E-mail: yuvani.noriz@pascoprocessing.com
Website: <https://oregonpotato.com/>

TRIP DETAILS:

Inspection Date: June 29, 2023
Inspection Time: 09:00 through 12:15
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
Mhara Coffman, US EPA Region 10, RMP Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: November 25, 2008
Date of Latest Update: June 10, 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)
1000100207	Frozen Fruit, Juice, and Vegetable Manufacturing	1000125514	311411	3	Ammonia, Anhydrous (7664-41-7)	19,000

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: 2017
- The facility is High Risk: No ☐ Yes ☒
- Joint EPCRA inspection: No ☐ Yes ☒

EXTERNAL COORDINATION:

Benton county LEPC and Pasco Fire Department were invited to participate in the inspection and personnel from each organization accepted the invitation. Both entities participated in the introductory meeting of the inspection and tour of the Freeze Pack regulated process areas.

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: Ammonia Release on 8/31/2022, NRC#1346077 NRC notification was two hours late. Facility reported no offsite impact as the facility was not running at the time of the incident. The incident was discovered at 1:04 pm and reported by the B&R Supervisor. The incident lasted approximately 10 minutes in the chill freezer, causing a vapor leak and internal odor in the production and packaging area that was coming from the chill freezer fan #3 and coil unit.

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: 2/27/2023
Did the facility submit a Tier II to the LEPC and local fire department? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: 2/27/2023

INSPECTION ENTRY:

Terry Garcia led the inspection entry. The EPA team arrived at the facility at 09:00 and was joined by the following facility personnel and local responders:

Name	Title
Thomas Moore	Oregon Potato Company Safety Manager [OPC]
Leticia Mendoza	Maintenance Manager
Roberto Castaneda	Pasco PSM Coordinator

Name	Title
Yuvani Noriz	Emergency Contact & Refrigeration Manager
Steve Harris	Plant Manager
Meredith Denny	Contractor, APSM Consultant
Sean Davis	Director, Franklin County Emergency Management
Ricky Michaels	City of Pasco Fire Hazmat Coordinator
Chris Lee	Director of Pasco Fire

Was a state/county/or local emergency representative present? No ☐ Yes ☒

If Yes, Name and Title of Representative: Sean Davis, Director Franklin County Emergency Management; Chris Lee, Director of Pasco Fire; Ricky Michaels, Pasco Fire Hazmat Coordinator.

The facility is a first responder: No ☒ Yes ☐

If No, Responding Agency: City of Pasco Fire Dept.

The inspection team was escorted to a conference room located in the facility's office building upstairs. 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. Thomas Moore, OPC Safety Manager gave a brief description of the facility, operations, and personal protective equipment required for the tour. The group donned PPE which included: hair nets, bump caps, hearing protection, and safety eyewear.

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

GENERAL INFORMATION:

The facility is regulated under the RMP as a Program Level 3 facility and is owned and operated by Freeze Pack, Inc. (Freeze Pack) whose parent company is Oregon Potato Company. Freeze Pack was established in Pasco, Washington in 2007 at its current location and was obtained by Oregon Potato Company in 2012. In 2020, Freeze Pack discontinued processing onions. Currently they process premium Pacific Northwest blueberries that are individually quick frozen (IQF). The berries are brought from harvest and put through an air cleaner/shaker system and then cleaned through a chlorine/water bath. They are put back in the shaker to remove stems and leaves. After the berries are put through peracetic acid spray and sorted again for size/quality. Finally, the berries are inspected three times, put through a metal detector, and then frozen in a IQF freeze system. The frozen berries are transported to the nearby Radar Farms for packaging and distribution. Radar Farms is owned by Oregon Potato Company. Approximately 150,000 lbs. of blueberries are processed in a short 6-week season starting in June and ending mid-July.

The regulated substance at this facility is anhydrous ammonia used in a closed-loop refrigeration system for product refrigeration and freezing. The ammonia refrigeration system has one engine room with five screw compressors.

The facility's hours of operation are 24/7 with two production shifts and a 4-hour clean-up shift. There are 24 full-time employees on site. The facility has only one operator, Yuvani Noriz, B & R Supervisor who has been with the company for thirteen years.

In 2020 the facility shut down and decommissioned process equipment in the onion receiving line area and decommissioned Compressor #1 in the engine room.

ON-SITE OBSERVATIONS:

The facility tour was conducted from approximately 09:15 to 10:15. The inspection team was escorted by Yuvani Noriz to the engine room, blanching/freezing area, cold storage rooms and freezer tunnel.

Piping to three (3) de-commissioned evaporators in the onion receiving area were capped, locked, and tagged out of service (Photo 1). The vertical suction accumulator was observed in the blanching/freezing area (Photo 2).

The freezer tunnel and horizontal suction accumulator were observed in the blanching/freezing area (Photo 6 and 7). Two ammonia detectors were observed near the horizontal suction accumulator in the blanching/freezing area (Photo 3). Non-destructive testing locations were observed on the horizontal suction accumulator done by Kemper Northwest for a June 2023 mechanical integrity audit (Photo 8 and 9).

An emergency shutdown button (E-stop) was located next to the engine room door entry (Photo 10). Hazard communication and authorized personnel only were located outside of the engine room between cold storage area and ER (Photo 10). Two ammonia detectors located in the engine room with one between Compressor #3 and #4 and the second above the LPR that activate a third-party security alarm at 50 ppm and emergency ventilation at 150 ppm (Photo 14 and 15). Emergency shower/eyewash stations are located both inside and outside the engine room (Photo 11 and 16). Nine pressure relief valves (PRV) located in the engine room with a September 2022 replacement date were overdue (Photo: 13). An air intake and exhaust fans were observed for engine room ventilation system (Photo 17, 18 and 19). Condensers (installed in 2015) are located on a platform above the high-pressure receiver (HPR) outside the engine room (Photo 28 and 29). A windsock was located on top of a condenser (Photo 33). The main vent stack header for the PRVs was located on the roof (Photo 34). A manual labeled king valve was located above the HPR that was not readily accessible during an emergency shutdown (Photo 29 and 31). The automatic king valve above the HPR can be closed when the e-stop button is used during an emergency shutdown (Photo 11 and 31). Hazard communication and authorized personnel only were located outside of the engine room control room entrance door (Photo 36). An equipment display panel is located inside the control room (Photo 38). A manual ammonia emergency shutdown station was located outside the engine room next to the HPR (Photo 35 and 36). Exit egress doors from the engine room to the outside do not have panic bars (Photo 25, 26 and 27).

One evaporator was observed in the cold storage area and the orange and yellow piping were labeled (Photo 22). An ammonia detector was observed in the dry storage area that was uncovered (Photo 23 and 30). Two decommissioned evaporators and lines were observed cut and capped off in the dry storage area (Photo 24).

After touring the RMP-covered process areas at the Freeze Pack 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 Thomas Moore, Leticia Mendoza, Roberto Castaneda, Yuvani Noriz, Steve Harris, Meredith Denny, APSM Consultant, LEPC representative, Sean Davis and Pasco Fire personnel that were present during open conference existed the building after the tour.

INFORMATION COLLECTED FROM FACILITY:

1. Freeze Pack letter to Pasco Fire dated 2/27/23 documenting 2022 Tier II submittal.

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

1. **Process Safety Information:** Exit egress doors from the engine room to outside do not have panic hardware. [68.65(d)(2)]. [ANSI/IIAR 2-2008 Addendum B §13.3.3, Access and Egress: 13.3.3.1].
2. **Mechanical Integrity:** Nine pressure relief valves (PRV) located in the engine room with a September 2022 replacement date were overdue. The facility provided documentation that showed they had back-orders for replacing the overdue PRVs. [68.73(d) and (e)].
3. **Management of Change (MOC):** An open MOC for decommissioning Compressor #1 in the engine room shows that changes were not completed for process safety information and operating procedures. [68.75(d) and (e)].
4. **Hazard Assessment:** Freeze Pack did not review and update their off-site consequence analyses (OCA) at least once every five years. [68.36(a)]. Freeze Pack most recent OCA documentation on file is dated 2018. Freeze Pack was due in 2023 to update and review their OCA documentation. The 2023 Compliance Audit report identified the OCA documentation issue as a finding.
5. **Compliance Audits:** Freeze Pack provided their 2017 and 2023 compliance audit reports that were on file. Freeze Pack did not complete a compliance audit due in 2020 due to the COVID pandemic. [68.79(a)].
6. **Compliance Audits:** Freeze pack did not promptly determine and document an appropriate response and corrective actions to each of the findings in their 2017 Compliance Audit. [68.79(d)]. The 2017 Compliance Audit findings carried over to the 2023 Compliance Audit. The 2023 Compliant Audit identified this issue in the tracking of audit findings.
7. **Training:** Freeze Pack was unable to provide initial training documentation for operator, Yuvani Noriz. The 2023 compliance audit report finding (G Finding, Training, pg. 3) stated that initial training for Refrigeration Operator, Yuvani Noriz, will be completed by 9/30/2023. [68.71(a)(1) and (c)].
8. **Process Hazard Analysis (PHA):** Freeze Pack provided their 2008 and 2017 PHA Tracking of Recommendations/Action Items documentation. The 2008 PHA findings and recommendations were not resolved and closed until 2022. The 2017 PHA findings and recommendations remain open in 2023. [68.67(e)]. The 2023 Compliant Audit identified this issue in the tracking of 2017 PHA findings.
9. **Process Hazard Analysis (PHA):** Freeze Pack provided their 2008 and 2017 PHA Tracking of Recommendations/Action Items documentation. Freeze Pack did not complete an update and revalidation of their PHA due in 2022. [68.67(f) and (g)]. The 2023 Compliant Audit identified this PHA issue for updates and revalidation not being completed at least every five years.

10. **Mechanical Integrity:** Freeze Pack did not provide inspection and testing records for ammonia refrigeration process equipment such as piping systems, pressure vessels, relief valves, compressors, and pumps. The only inspection records provided at time of inspection were daily rounds done by their operator for June 28 and 29, 2023. The 2023 Compliance Audit report identified the lack of inspection and testing records for process equipment. [68.73(d)].
11. **Mechanical Integrity:** Freeze Pack provided the last ammonia detector calibration performed on 6/23/2020 by Measure Tech. [68.73(d) and (e)]. [(IIAR standard is every 6 months). ANSI/IIAR 2-2008 §13.2.5.1, ANSI/IIAR 2-2008 §13.2.5.2 (annual basis if no manufacturers' recommendations)].
12. **Mechanical Integrity:** Freeze Pack inspections and testing procedures for refrigeration process equipment are not following recognized and generally accepted good engineering practices such as IIAR standards. [68.73(d)(2)].
13. **Mechanical Integrity:** Freeze Pack did not provide written maintenance procedures for their ammonia refrigeration process equipment. The 2023 Compliance Audit report identified the lack of written maintenance procedures for process equipment such as procedures for draining oil from all oil pot vessels. [68.73(b)].
14. **Mechanical Integrity:** Freeze Pack was unable to provide training records for employees involved in maintaining ammonia refrigeration process equipment. [68.73(c)]. Freeze Pack uses a contractor, Kemper, to maintain the refrigeration process equipment.
15. **Process Safety Information:** Freeze Pack's ventilation system design does not meet IIAR standards for normal and emergency ventilation in the engine room. [68.65(d)(1)(v) and (vi), (d)(2)]. The 2023 Mechanical Integrity (MI) Audit Report (July 2023) identified that the ventilation system does not meet current codes and standards which was previously identified in a 2017 MI audit recommending a ventilation study. The 2023 Compliance Audit report identified this issue with the ventilation system design.
16. **Emergency Response:** Freeze Pack was unable to provide documentation that they performed their annual response activities with local response authorities. [68.93(c)].
17. **Incident Investigation:** The Freeze Pack incident investigation report INC-3002 for the 8/31/2022 ammonia release does not include any corrective actions for the findings and recommendations. [68.81(e)].
18. **EPCRA (Section 304):** Emergency Release Notification requires facilities to immediately notify the SERC (or TERC) and LEPC (or TEPC) if there is a release into the environment of a hazardous substance that is equal to or exceeds the minimum reportable quantity established in the regulations. As required by EPCRA Section 304(c), a follow-up written report must be submitted to the SERC (or TERC) and LEPC (or TEPC) as soon as practicable after the release. The follow-up report must update information included in the initial notice and provide information on actual response actions taken and advice regarding medical attention necessary for citizens exposed. The facility had an ammonia release on 8/31/2022 Ammonia Release NRC#1346077 NRC notification was two hours late. The facility did not provide an initial report to the SERC or LEPC and did not provide a written updated follow up report as required. The Freeze Pack facility provided an internal Incident Investigation report (#INC-3002 date 9/2/2022) to EPA in response to request for release information. No other written documentation or follow-up reports were provided.

19. **EPCRA:** Freeze Pack has conflicting addresses listed for the facility. The Freeze Pack 2022 Tier II report uses address 400 Commercial Ave, Pasco, WA. The 2019 RMP uses address 302 North Venture Road, Pasco, WA.

DOCUMENTS REQUESTED NOT INCLUDED IN REPORT:

The following documents were requested during the 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. Compliance Audit 2017 and 2023 Tracking of Recommendations/Action Items.
2. Documentation of ITPM Inspection/Testing/Preventative Maintenance on Process Equipment including NH3 detector calibration schedule; and information on who calibrates.
3. 2008 and 2017 PHA Tracking of Recommendations/Action Items for both PHA revalidations.
4. 2023 Mechanical Integrity Audit performed recently by Kemper – to be emailed to EPA when report is finalized and complete with tracking of findings/auctions item/ and photos.

On July 13, 2023, and October 3 and 5, 2023, Freeze Pack provided the documents listed above via e-mail including Contractor Safety and Evaluation packets for US Insulation, Kemper Refrigeration, and Measure Tech Calibration. In addition, on November 14, 2023, Freeze Pack provided two Management of Change (MOC) documents (MOC dated 6/28/2023, Condensers EC1/EC2 PRV removal; MOC dated 4/06/2021 Cut/Cap lines in dry storage and receiving area) via email.

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

Inspector Signature

Digitally signed by Terry Garcia

Date: 2024.01.09 18:41:46 -08'00'

JAVIER MORALES

Digitally signed by JAVIER

MORALES

Date: 2024.01.10 13:21:07 -08'00'

RMP Coordinator/Approval

ERIN WILLIAMS

Digitally signed by ERIN WILLIAMS

Date: 2024.01.10 12:50:39 -08'00'

EPCRA Coordinator/Approval

**MATTHEW
QUARTERMAN**

Digitally signed by MATTHEW

QUARTERMAN

Date: 2024.01.10 16:01:15 -08'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: Freeze Pack Inc.

City, State: Pasco, WA

Photographer: Peter Phillips

File Name	Photo	Date	Time	Description
IMG_0211.JPG	1	6/29/2023	9:36 AM	Onion receiving are not in service
IMG_0212.JPG	2	6/29/2023	9:38 AM	Chiller and accumulator
IMG_0213.JPG	3	6/29/2023	9:38 AM	Ammonia detector
IMG_0214.JPG	4	6/29/2023	9:40 AM	freezer room
IMG_0215.JPG	5	6/29/2023	9:40 AM	freezer room hanging pipe
IMG_0216.JPG	6	6/29/2023	9:41 AM	Freezer tunnel
IMG_0217.JPG	7	6/29/2023	9:41 AM	Freezer accumulator
IMG_0218.JPG	8	6/29/2023	9:42 AM	Non-destructive testing location (Kemper)
IMG_0219.JPG	9	6/29/2023	9:42 AM	Non-destructive testing location (Kemper)
IMG_0220.JPG	10	6/29/2023	9:43 AM	Engine room entrance door, Hazcom and Authorized Personnel Only signage, and E-stop.
IMG_0221.JPG	11	6/29/2023	9:43 AM	Shower/eye wash outside of engine room
IMG_0222.JPG	12	6/29/2023	9:44 AM	Engine room overview
IMG_0223.JPG	13	6/29/2023	9:44 AM	Pressure relief valve (several out of date - invoice provided)
IMG_0224.JPG	14	6/29/2023	9:45 AM	Ammonia detector
IMG_0225.JPG	15	6/29/2023	9:46 AM	Ammonia detector
IMG_0226.JPG	16	6/29/2023	9:47 AM	Shower/eye wash in engine room
IMG_0227.JPG	17	6/29/2023	9:48 AM	Engine room ventilation intake (1 of 3)
IMG_0228.JPG	18	6/29/2023	9:48 AM	Engine room ventilation exhaust fan (3 total)
IMG_0229.JPG	19	6/29/2023	9:48 AM	Engine room ventilation exhaust fan (3 total)
IMG_0230.JPG	20	6/29/2023	9:49 AM	Vessel - sub cooler
IMG_0231.JPG	21	6/29/2023	9:50 AM	Engine room pressure gauges
IMG_0232.JPG	22	6/29/2023	9:52 AM	Cold storage room evaporator
IMG_0233.JPG	23	6/29/2023	9:53 AM	Ammonia detector (covered by sanitation crew)
IMG_0234.JPG	24	6/29/2023	9:54 AM	Tagged storage equipment (out of service)
IMG_0235.JPG	25	6/29/2023	9:55 AM	Engine room exit door
IMG_0236.JPG	26	6/29/2023	9:58 AM	Engine room exit door - no panic bar
IMG_0237.JPG	27	6/29/2023	9:59 AM	Engine room exit door - no panic bar
IMG_0238.JPG	28	6/29/2023	10:00 AM	Condensers atop HPR outside of engine room
IMG_0239.JPG	29	6/29/2023	10:00 AM	HPR
IMG_0240.JPG	30	6/29/2023	10:01 AM	Ammonia detector (uncovered by facility staff)
IMG_0241.JPG	31	6/29/2023	10:03 AM	King valve on HPR
IMG_0242.JPG	32	6/29/2023	10:04 AM	Condensers atop engine room
IMG_0243.JPG	33	6/29/2023	10:04 AM	Condensers atop engine room and windsock
IMG_0244.JPG	34	6/29/2023	10:05 AM	PRV vent stack on roof
IMG_0245.JPG	35	6/29/2023	10:06 AM	Manual ammonia emergency station
IMG_0246.JPG	36	6/29/2023	10:06 AM	Manual ammonia emergency station
IMG_0247.JPG	37	6/29/2023	10:09 AM	Engine room control room
IMG: Facility	38	12/8/2023		Inside Control Room with equipment display panel. (Photo taken by Facility)