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:	Sysco Alaska, Inc.
Physical Address:	6601 Change Point Drive
Phone Number:	(907) 565-5567
Latitude/Longitude:	61.161833/ -149.904722
RMP Facility ID#	1000 0023 7004
FRS ID#:	110070148253
EJ Concerns:	Yes (80%)

CONTACT INFORMATION (RMP Implementation):

Name:	Jason Simmons, Fleet & Facilities Manager
Phone Number:	(907) 306-6895
E-mail:	Jason.Simmons@sysco.com

EMERGENCY CONTACT INFORMATION:

Name:	Boyd Jorgensen
Phone (24-hr):	(907) 306-6895
E-mail:	boydj@ditomasos.com
Website:	https://www.sysco.com/

TRIP DETAILS:

Inspection Date:	September 13, 2023
Inspection Time:	09:00 through 14:45
Inspectors:	Terry Garcia, US EPA Region 10 SEE Grantee, Lead RMP Inspector Erin Williams, US EPA Region 10, EPCRA Inspector Peter Phillips, US EPA Region 10 SEE Grantee, RMP Inspector Edward Johannes, US EPA Region 10 SEE Grantee, RMP Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date:	November 10, 2017
Date of Latest Update:	November 21, 2022

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)
1000128353	Ammonia Refrigeration	1000160938	42441	3	Ammonia, Anhydrous (7664-41-7)	15,000

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:
- 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 [Enter Year] Tier II report to the SERC? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: 2/27/2023
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: 2/27/2023

INSPECTION ENTRY:
Terry Garcia led the inspection entry. The inspection team met at the Sysco Alaska, Inc. facility in Anchorage, Alaska. The team arrived at the facility at 09:00 was joined by the following facility personnel:

Name	Title
Jay Simmons	Fleet & Facility Manager
Keyongnun Kwon	Maintenance Coordinator

Was a state/county/or local emergency representative present? No ☐ Yes ☒
If Yes, Name and Title of Representative: Pat O'Shea, Hazmat Lead Anchorage Fire Department, Dustin Molle, Anchorage Fire Department and Franklin Trainer, Anchorage Fire Department

The facility is a first responder: No ☒ Yes ☐
If No, Responding Agency Anchorage Fire Department

The inspection team was escorted to a conference room located in the facility's office building. 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 requested an explanation of the facility's operations and safety measures and PPE required. Jay Simmons gave a brief description of the facility, operations, and personal protective equipment required for the tour. Inspectors wore required PPE including high visibility vest, safety glasses hearing protection and closed toe shoes.

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 Risk Management Program as a Program Level 3 and is owned and operated by Sysco Corporation. Sysco Alaska - Anchorage, AK (Sysco Alaska) refrigerated warehouse is used to keep products at temperature and preserve food safety standards. The Sysco Alaska facility receives product from the lower 48 states in U.S. and distributes throughout all regions of Alaska. There are between 50-60 full-time employees on site. Seasonal aspects of the business demand more or less employees at high season.

Sysco Alaska utilizes an anhydrous ammonia refrigeration system with one engine room containing four compressors. Anhydrous ammonia is the only regulated substance present at Sysco Alaska in the city of Anchorage. The maximum intended inventory of anhydrous ammonia is 15,000 pounds.

In April 2023, Sysco installed a new compressor in the engine room.In April 2023, Sysco installed a new compressor in the engine room.

ON-SITE OBSERVATIONS:

The facility tour was conducted from approximately 09:45 to 10:30. The inspection team was escorted by Jay Simmons, Plant Manager, and Keyongnun Kwon, Maintenance Coordinator. The inspection team observed the following areas of the plant: Engine Room, The Receiving Docks (2 North side (outbound) and 2 South side (receiving)), The Chiller Storage area, The Dry Storage area, and The Meat Storage area.

The dry storage area has no ammonia present (Photo 1). The chiller storage area has twelve (12) total evaporators with two ammonia sensors at each side of the room near each bank of evaporators in ceiling (Photo 2, 3, 4, and 5). The dry storage room has a blue strobe for detected ammonia leaks and a 911 call sign visible near the strobe (Photo 6). The freezer room operates at minus 2 degrees F has one evaporator and an ammonia detector (Photo 7). The meat storage area operates at 32 degrees F with two evaporators and an ammonia detector (Photo 8 and 9). The north side (outbound docks) has a forklift

battery charging station and two evaporators in the ceiling (Photo 9, 10 and 11). An emergency shower/eyewash station was observed in the north side room (Photo 12).

Engine room has a restricted access sign on the entry door, NFPA 704 placard and other chemical hazard signage (Photo 13). Pressure relief valves (PRV) in the engine room showed replacement due dates of July 1, 2024. A compressor, low pressure receiver (LPR), high pressure receiver (HPR), recirculator and intercooler were labeled (Photo 19, 22, 27 and 28). Intercooler cools the ammonia flowing between the two compression stages for the reheat function and the recirculator provides a constant liquid level to be maintained in the accumulator (Photo 27). Nameplate and inspection tag are visible on the HPR (Photo 30). The vertical HPR has a labeled manual king valve and an automatic king valve (Photo 28).[1] Nameplate and inspection tag are visible on two pressure vessels (Photo 29 and 31). The insulated piping has color-coded labeling for liquid and vapor (yellow line) with directional lines (Photo 26 and 27). Two emergency shower and eyewash stations are located in the engine room (Photo 17 and 19). Two ammonia detectors were located in the engine room (Photo 23 and 24). The engine room ventilation system has two exhaust fans and two louvered air intakes that were closed with boxes stacked in front of one air intake blocking air flow (Photo 25, 26 and 32).[2] A blue strobe light with audible alarm is located next to the engine room exit door with panic bar (Photo 20). An ammonia dispersion tank with a vent stack located outside the engine room is connected to the pressure relief valve system for handling any release of ammonia (Photo 33 and 34). The dispersion tank has a total capacity of 3,371 gallons of water. Condensers are located on the rooftop of the engine room (Photo 36). Two windsocks are located on the roof (Photo 35 and 36).

The ammonia detection levels to activate alarms, emergency shutdown and ventilation system are given in the table below.

Ammonia Sensor Location	Concentration (exceeding)	System Response
Engine Room	25 ppm	Emergency ventilation in mechanical room.
Engine Room	25 ppm	Audible/visual alarms.
Evap./Room/ Building	25 ppm	Audible/visual alarm inside building.
Evap./Room/ Building	25 ppm	Disable Evaporator.
Relief Header	5,000 ppm	Audible/visual alarm.
Engine Room	7,000 ppm	All electrical refrigeration equipment in the machine room is disabled.

Photographs taken of the ammonia process areas at the facility are included to this report.

[1] Sysco described the operation of the automatic king valve in a 12/20/23 email. "The automatic king valve is closed when the system is put into the pump down mode of operation. The pump down mode of operation will close off all liquid feed valves and pull the pressure down in the system to close to atmospheric pressure to mitigate any potential releases."

[2] Sysco described the operation of the louvered air intakes in a 12/20/23 email. "The louvered air intakes are closed when the emergency or temperature control exhaust fans are not running. When the exhaust fans are turned on in the event of detection of an ammonia concentration above the setpoint or temperature above the setpoint then the louvers will open up to provide make-up air to the space. The louvers are not open during normal operating conditions due to the extreme cold environment of the facility location. The cold ambient conditions are detrimental to the safe & efficient operation of the refrigeration system mechanical room equipment."

After touring the RMP-covered process areas at the Sysco Alaska facility the inspection team returned to the conference room to review RMP documentation. Upon completion of the document review, EPA provided a debriefing to facility staff Mr. Simmons and Ms. Kwon.

INFORMATION COLLECTED FROM FACILITY:

1. Completed Training Summary Form
2. 2022 PHA Revalidation Oct. 11-12, 2022, done by Nexus Refrigeration [1st 5 pages only]
3. Partial pages from OSHA DOL PSM Citations/Notifications of Penalty for Violations.
4. A 2021 5- year Mechanical Integrity Audit by 3rd party Allen Denton Inspector included 119 open findings.

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

1. **Compliance Audit:** Sysco Alaska 2023 Compliance Audit report has two audit findings that have carried over from the 2020 Compliance Audit report that were not promptly resolved. [68.79(d)]. 2023 Items 16 and 17 identified as repeat finding.

2. **Mechanical Integrity:** Sysco Alaska did not provide written maintenance procedures to maintain the on-going integrity of refrigeration process equipment. [68.73(b)].

3. **Mechanical Integrity:** Sysco Alaska did not provide training documentation for each employee involved in maintaining refrigeration process equipment. [68.73(b)]. The Sysco Alaska operators are Jay Simmons, Brian Heaslet and Jay Minter who do daily maintenance of process equipment. Sysco Alaska uses Wyatt Refrigeration contractor staff (Dan Laney; Nick Cermele; Brandon Dolquist and Tryntan Dolquist) to maintain process equipment.

4. **Mechanical Integrity:** Sysco Alaska 2021 Mechanical Integrity (MI) Audit report identified findings of process equipment deficiencies requiring correction. [68.73(e)]. The 2021 MI audit provided no description of corrective actions, persons responsible for action items, and completion dates. Identified in the 2023 Compliance Audit Item #14 as repeat finding.

5. **Process Safety Information:** Sysco Alaska ventilation system design for the engine room does not meet codes and standards for normal and emergency ventilation. [68.65(d)(1)(v)]. [IIAR 6.14.3.5, 6.14.5.3, 6.14.6.1, and 6.14.7.1].

6. **Standard Operating Procedures:** Sysco Alaska's operating procedures were not annually certified as current and accurate. [68.69(c)]. Sysco Alaska was unable to provide annual certification documentation for their operating procedures.

7. **Standard Operation Procedures:** Sysco Alaska operating procedures did not address operating limits with consequences of deviation; and steps required to correct or avoid deviation for refrigeration process equipment. [68.69(a)(2)].

8. **Contractor Program:** Sysco Alaska was unable to provide safety performance and program documentation used to evaluate contractors when selecting a contractor. [68.87(b)(1)]. Sysco Alaska was unable to provide documentation that periodically evaluates the performance of their contractors such as Innovative Refrigeration System, Capstone Logistics, Wyatt Refrigeration, B. Electric and McCowan Crafted Inc. [68.87(b)(5)].

9. **Management of Change (MOC)**: Sysco Alaska did not implement written procedures to manage changes (except for "replacements in kind") to process chemicals, technology, equipment, and procedures; and, changes to stationary sources that affect their ammonia refrigeration process. [68.75 (a-e)]. The 2023 Compliance Audit #12 Finding referring to MOC 2020-02 adding a vent line to intercooler oil pot and not updating P&IDs for this change.

10. **Pre-Startup Safety Review (PSSR)**: Sysco Alaska did not perform a pre-startup safety review for new stationary sources and for modified stationary sources when the modification is significant enough to require a change in the process safety information. [68.77]. The 2023 Compliance Audit #12 Finding referring to MOC 2020-02 adding a vent line to intercooler oil pot and not updating P&IDs for this change.

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. Initial and refresher training for three Sysco operators (Simmons, Heaslet and Minter).
2. Documentation on contractor program including the safety performance and periodic evaluation of contractors such as Innovative Refrigeration System, Capstone Logistics, Wyatt Refrigeration, B. Electric and McCowan Crafted Inc.
3. Updated 2021 Mechanical Integrity Audit Report and tracking of corrective actions items/persons responsible including any photos from audit.
4. Updated Nexus PHA tracking of findings from 2023 PHA revalidation.
5. Written policy for MI program.
6. 2011 PHA.
7. Maintenance training documentation for Wyatt Refrigeration staff.

On October 27, 2023, and November 6, 2023, Sysco Alaska provided documentation to the items listed above via email. On December 21, 2023, Sysco Alaska provided additional documents that included an attached relief system P&ID showing the relief sensor located on the outlet of the dispersion tank and the engineer stamped fire system drawings indicating the number of ammonia detectors and their locations and number and locations audible/visible alarms. These documents were not available at the time of inspection.

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

Digitally signed by Terry Garcia
Date: 2024.01.12 10:12:14 -08'00'

Inspector Signature

JAVIER MORALES

Digitally signed by JAVIER MORALES
Date: 2024.01.12 10:34:36 -08'00'

RMP Coordinator/Approval

ERIN WILLIAMS

Digitally signed by ERIN WILLIAMS
Date: 2024.01.12 11:32:33 -08'00'

EPCRA Coordinator/Approval

MATTHEW QUARTERMAN

Digitally signed by MATTHEW QUARTERMAN
Date: 2024.01.12 12:50:53 -08'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: Sysco Alaska, Inc.

City, State: Anchorage, AK

Photographer: Peter Phillips

Flle	Date	Time	Description
1	9/13/2023	9:49 AM	Dry room – no ammonia present
2	9/13/2023	9:50 AM	Chill room stacked storage
3	9/13/2023	9:52 AM	Chill room evaporators
4	9/13/2023	9:52 AM	Chill room evaporators
5	9/13/2023	9:54 AM	Chill room
6	9/13/2023	9:56 AM	Dry room, strobe
7	9/13/2023	9:57 AM	Freezer room
8	9/13/2023	9:58 AM	Meat room evaporators
9	9/13/2023	9:58 AM	Meat room ammonia detector
10	9/13/2023	10:01 AM	North room charging station
11	9/13/2023	10:01 AM	North room evaporators
12	9/13/2023	10:02 AM	North room emergency shower
13	9/13/2023	10:03 AM	Engine room door
14	9/13/2023	10:04 AM	Control room
15	9/13/2023	10:04 AM	Control room ppm levels
16	9/13/2023	10:05 AM	LOTO station in the machine room
17	9/13/2023	10:07 AM	Emergency shower machine room
18	9/13/2023	10:08 AM	Compressor
19	9/13/2023	10:08 AM	Compressor and emergency shower/eyewash station
20	9/13/2023	10:08 AM	Engine room, exit and strobe
21	9/13/2023	10:09 AM	Engine room panel
22	9/13/2023	10:09 AM	Engine room, LPR
23	9/13/2023	10:10 AM	Engine room ammonia detector 1
24	9/13/2023	10:10 AM	Engine room ammonia detector 2
25	9/13/2023	10:11 AM	Engine room ventilation air intake 1
26	9/13/2023	10:11 AM	Engine room exhaust fan
27	9/13/2023	10:12 AM	Engine room intercooler and recirculator
28	9/13/2023	10:14 AM	HPR and labeled King Valve
29	9/13/2023	10:14 AM	Vessel Nameplate and Inspection tag
30	9/13/2023	10:15 AM	HPR Nameplate and Inspection tag
31	9/13/2023	10:16 AM	Vessel Nameplate and Inspection tag
32	9/13/2023	10:17 AM	Engine room ventilation air intake 2
33	9/13/2023	10:18 AM	Ammonia Dispersion Tank
34	9/13/2023	10:19 AM	Ammonia dispersion tank and vent stack
35	9/13/2023	10:20 AM	Windsock
36	9/13/2023	10:21 AM	Condenser and second windsock