



**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: OFD Foods, LLC Plant 1
Physical Address: 770 29th Ave SW, Albany, OR 97321
Phone Number: 541-926-6001
Latitude/Longitude: 44.614167, -123.111389
RMP Facility ID#: 1000 0006 3691
FRS ID#: 110001657733
EJ Concerns: No (below 80%)

CONTACT INFORMATION (RMP Implementation):

Name: Gray Johnson
Phone Number: 541-967-6413
E-mail: gray.johson@ofd.com

EMERGENCY CONTACT INFORMATION:

Name: Gray Johnson
Phone (24-hr): 541-967-6413
E-mail: gray.johson@ofd.com
Website: www.ofd.com

TRIP DETAILS:

Inspection Date: June 28, 2022
Inspection Time: 0900 hours through 1430 hours
Inspection Team: Peter Phillips, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Terry Garcia, US EPA Region 10 SEE Grantee, RMP Inspector
Edward Johannes, US EPA Region 10 SEE Grantee, RMP Inspector
Tom Vroman, CIH, Weston Solutions, Inc., EPA START Contractor

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: July 19, 1999
Date of Latest Update: March 1, 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)
1000118169	Anhydrous Ammonia	1000147751	311423	3	Ammonia, Anhydrous (7664-41-7)	48,000

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 ☐
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 ☐

RELEASE/ACCIDENT HISTORY:

Did the facility have a reportable release in the past 5 years? No ☒ Yes ☐

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: 3/15/2022

Did the facility submit a Tier II to the LEPC and local fire department? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 3/15/2022

INSPECTION ENTRY:

Peter Phillips led the inspection entry. The EPA Inspection Team (EPA) met with facility representative Gary Johnson at the OFD Foods, LLC main office in Albany, Oregon. EPA arrived at the facility at 0900 hours and was joined by the following facility and contracted personnel:

Name	Title
Gary Johnson	OFD Engineer
Jason Luty	HSE Manager
Jacques Muluc	Maintenance Manager
Bradley Marshall	OFD Refrigeration Coordinator
Greg Skaer	OFD Consultant

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

The facility is a first responder: No ☐ Yes ☒

The inspection team was escorted to a conference room located in the facility's office building. Introductions were made by Peter Phillips, 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. Gary Johnson 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 ☐
An employee representative present during the facility visit: No ☒ Yes ☐

GENERAL INFORMATION:

The facility is regulated under the Risk Management Program as a Program Level 3 facility and is owned and operated by OFD Foods, LLC (OFD). OFD operates an anhydrous ammonia refrigeration process within Plant 1 to cool rooms and the chambers where the products are freeze dried. Anhydrous ammonia is the regulated substance used in the refrigeration system equipment. Plant 1 is supported by approximately 350 employees. Plant 1 operates 24 hours a day, seven days a week, with two, 12-hour shifts each day. OFD has four trained operators for their ammonia refrigeration system. Operators and shift mechanics can remotely shutdown the refrigeration system from outside the building (Photo 26).

OFD maintains an internal facility response team, consisting of 33 OFD employees who receive annual training. Supplies for the response team are located next to the parking lot of Plant 1 (Photos 36-39). OFD also coordinates with the Albany Oregon Fire Department for emergency response preparedness.

There are no process modifications in the anhydrous ammonia refrigeration process.

ON-SITE OBSERVATIONS:

The facility tour for Plant 1 was conducted from approximately 1100 hours to 1200 hours. EPA was escorted by facility representatives Gary Johnson, Jacques Muluc, and Greg Skaer. Plant 1 has 48,000 pounds of anhydrous ammonia which runs through 15 compressors located in two adjacent engine rooms, designated as North Engine Room and South Engine Room. The engine rooms are labeled on the outside and have audio visual alarms installed outside and inside each room (Photos 1-4). Each engine room is equipped with ammonia sensors set with a low alarm at 25 ppm and a high alarm of 2 percent concentrations of ammonia in the air (Photos 7, 17). Each engine room has emergency stops installed on control panels (Photos 11, 19), and includes emergency washing stations (Photos 5, 18).

The North Engine Room contains a low temperature ammonia receiver (Photo 6), pressure relief valves (Photos 8-10), the system intake and exhaust ventilation (Photos 12-14), and a high-pressure receiver (HPR) tank and associated king valve (Photos 15-16). Refrigeration components in the South Engine Room include the system intake and exhaust vents (Photos 20-23), an operational compressor designated as Compressor 9B (Photo 24), and a decommissioned compressor attached to Compressor 9B (Photo 25).

Additional refrigeration system components were observed at exterior areas of the facility, including emergency shut off controls (Photo 26), ammonia tanks (Photo 27), a second HPR tank and associated king valve (Photo 28), refrigeration system compressors (Photos 32, 33), and rooftop mounted ammonia piping (Photo 34).

EPA observed several safety measures in place at the exterior of the facility, including emergency shutoff controls (Photo 26), hazardous communications signage (Photos 29, 30), and a roof mounted windsock (Photo 31). EPA also observed emergency response supplies (Photos 36-39) and the training certificate for the facility ammonia operator (Photo 40).

Plant 1 also houses the lead acid battery recharging station (Photo 35), enabling two forklifts to be recharged at a given time.

EPA observed the facility ammonia refrigeration equipment as clearly labeled and tagged, with appropriate safety features in place.

Photographs taken at the facility are included in Attachment A to this report.

After touring the RMP-covered process areas at Plant 1 of OFD, the inspection team returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to the following people: Gary Johnson, Jason Luty, Jacques Muluc, Bradley Marshall, and Greg Skaer.

INFORMATION COLLECTED FROM FACILITY:

1. Visitor Rules and Regulations (1 page)
2. 2022 PSM/RMP Audit Report (7 pages)
3. Site Plan – Plant 1 (1 page 11 x 14 inches)

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

No areas of concern were identified in the closing conference.

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.

On 7/22/2022, OFD provided the requested information via email.

1. Updated 2022 RAGAGEPs List. The document was reviewed, and no issues were identified.
2. 2022 Compliance Audit Finding Tracking Sheet. The document was reviewed, and no issues were identified. All findings were assigned, completed, or had completion dates assigned.
3. Contractor Evaluations from Human Resources. OFD provided evaluation forms and OSHA 100 forms for the four contractors performing work on or near the refrigeration process. The document was reviewed, and no issues were identified.
4. Updated OFD Piping Specifications. The document was reviewed, and no issues were identified.

INSPECTION REPORT CERTIFICATION:

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

PETER PHILLIPS
(Affiliate)

Digitally signed by PETER
PHILLIPS (Affiliate)
Date: 2022.09.08 10:20:37 -07'00'

Inspector Signature

JAVIER MORALES

Digitally signed by JAVIER
MORALES
Date: 2022.09.08 10:41:59 -07'00'

RMP Coordinator/Approval

ERIN WILLIAMS Digitally signed by ERIN
WILLIAMS
Date: 2022.09.09 10:31:18 -07'00'

EPCRA Coordinator/Approval

Jennifer A Sullivan Digitally signed by Jennifer A
Sullivan
Date: 2022.09.09 10:42:38 -07'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: OFD Foods Plant 1

Site Name: Albany, OR

Site Name: Tom Vroman

File	Photo Layout ID	Date	Time	Description
Picture1.jpg	1	6/28/2022	11:06 AM	Access door, North Engine Room
Picture2.jpg	2	6/28/2022	11:06 AM	Signage and ammonia alarm at access door, North Engine Room
Picture3.jpg	3	6/28/2022	11:07 AM	Alarm at access door, South Engine Room
Picture4.jpg	4	6/28/2022	11:07 AM	Signage at access door, South Engine Room
Picture5.jpg	5	6/28/2022	11:07 AM	Emergency wash station, North Engine Room
Picture6.jpg	6	6/28/2022	11:08 AM	Low temperature ammonia receiver, North Engine Room
Picture7.jpg	7	6/28/2022	11:09 AM	Ammonia sensors, North Engine Room
Picture8.jpg	8	6/28/2022	11:10 AM	Pressure relief valves, North Engine Room
Picture9.jpg	9	6/28/2022	11:10 AM	Pressure relief valves, North Engine Room
Picture10.jpg	10	6/28/2022	11:10 AM	Pressure relief valves, North Engine Room
Picture11.jpg	11	6/28/2022	11:11 AM	Control panels with electronic stops, North Engine Room
Picture12.jpg	12	6/28/2022	11:12 AM	Ventilation exhaust, North Engine Room
Picture13.jpg	13	6/28/2022	11:13 AM	Ventilation intake, North Engine Room
Picture14.jpg	14	6/28/2022	11:13 AM	Ventilation intake, North Engine Room
Picture15.jpg	15	6/28/2022	11:17 AM	High pressure receiver (HPR) tank and associated king valve, North Engine Room
Picture16.jpg	16	6/28/2022	11:17 AM	High pressure receiver (HPR) tank and associated king valve, North Engine Room
Picture17.jpg	17	6/28/2022	11:15 AM	Ammonia sensors, South Engine Room
Picture18.jpg	18	6/28/2022	11:16 AM	Emergency wash station, South Engine Room
Picture19.jpg	19	6/28/2022	11:16 AM	Control panel and emergency stop, South Engine Room
Picture20.jpg	20	6/28/2022	11:17 AM	System exhaust vent, South Engine Room
Picture21.jpg	21	6/28/2022	11:18 AM	System intake vent, South Engine Room
Picture22.jpg	22	6/28/2022	11:18 AM	System intake vent, South Engine Room
Picture23.jpg	23	6/28/2022	11:20 AM	System intake vent, South Engine Room
Picture25.jpg	24	6/28/2022	11:21 AM	Compressor 9B in operation, South Engine Room
Picture24.jpg	25	6/28/2022	11:22 AM	Decommissioned compressor connected to operational Compressor 9B, South Engine Room
Picture26.jpg	26	6/28/2022	11:23 AM	Emergency shutoff controls, Plant 1 exterior.
Picture27.jpg	27	6/28/2022	11:24 AM	Ammonia tank, Plant 1 exterior
Picture28.jpg	28	6/28/2022	11:24 AM	HPR tank and associated king valve, Plant 1 exterior
Picture29.jpg	29	6/28/2022	11:24 AM	Hazardous communication signs and alarm, Plant 1 exterior
Picture30.jpg	30	6/28/2022	11:25 AM	NFPA placard, Plant 1 exterior
Picture31.jpg	31	6/28/2022	11:25 AM	Windsock, Plant 1 rooftop
Picture32.jpg	32	6/28/2022	11:26 AM	Compressor, Plant 1 rooftop
Picture33.jpg	33	6/28/2022	11:26 AM	Compressor, Plant 1 rooftop
Picture34.jpg	34	6/28/2022	11:27 AM	Ammonia piping, Plant 1 rooftop
Picture35.jpg	35	6/28/2022	11:36 AM	Lead acid battery recharge station
Picture36.jpg	36	6/28/2022	11:39 AM	Emergency response supplies
Picture37.jpg	37	6/28/2022	11:39 AM	Emergency response supplies
Picture38.jpg	38	6/28/2022	11:39 AM	Emergency response supplies
Picture39.jpg	39	6/28/2022	11:40 AM	Emergency response respirators
Picture40.jpg	40	6/28/2022	2:19 PM	Ammonia operator's training certificate