



**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)
CERCLA 103 / EPCRA 304, EPCRA 312 – Tier II
And Risk Management Program
Facility Release Inspection Report**

FACILITY INFORMATION:

Name: Seneca Foods LLC/CraftAg
Physical Address: 1525 S 4th St, Sunnyside, WA 98944
Phone Number: (509) 453-8161
Latitude/Longitude: 46.312428, -120.017938
RMP Facility ID# NA
FRS ID#: 110015578864
EJ Concerns: Yes (95%)

CONTACT INFORMATION (RMP Implementation):

Name: Larry Hull
Phone Number: (509) 453-8161
E-mail: larry@megalodonllc.net

EMERGENCY CONTACT INFORMATION:

Name: Larry Hull
Phone (24-hr): (509) 453-8161
E-mail: larry@megalodonllc.net
Website: NA

TRIP DETAILS:

Inspection Date: July 14, 2021
Inspection Time: 11:00 through 12:15
Inspectors: Erin Williams, US EPA Region 10, EPRCA Inspector
Bob Hales, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Edward Johannes, US EPA Region 10 SEE Grantee, EPRCA Inspector

PURPOSE:

The purpose of the inspection was to document the circumstances of an anhydrous ammonia release event that occurred at the facility on June 30, 2021.

- 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:* June 30, 2021. See release information below on description of the release.**EPCRA TIER II REPORTING:**

Did the facility submit the 2020 Tier II report to the SERC?

No ☐Yes ☒*If Yes, Date the Tier II was submitted:*

January 5, 2021

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 5, 2021

INSPECTION ENTRY:

Erin Williams led the inspection entry. The inspection team met with Larry Hull, Gary Stapleton, and Rick Wickersham of Central Washington Refrigeration (CWR) at the Seneca Foods facility in Sunnyside, Washington. The team arrived at the facility at 11:00 and was joined by the following facility personnel:

Name	Title
Larry Hull	Megalodon CEO
Gary Stapleton	VP Operations
Rick Wickersham	CWR Refrigeration Engineer

Was a state/county/or local emergency representative present?

No ☒Yes ☐*If Yes, Name and Title of Representative:*

The facility is a first responder:

No ☒Yes ☐*If No, Responding Agency:* Sunnyside Fire Department

The inspection team was escorted to a conference room located in the facility's office building. Introductions were made by Erin Williams, who provided a summary of the Emergency Planning and Community Right-to-Know Act (EPCRA) program 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. Larry Hull gave a brief description of the facility, operations, and personal protective equipment required for the tour.

Prior to the tour the inspection team was provided with the inventory calculations for anhydrous ammonia in the refrigeration system. Prior to the release, the inventory had been recorded as 9,995 lbs. of anhydrous ammonia. The reported ammonia inventory is less than the 10,000 lbs threshold limit for anhydrous ammonia requiring the implementation and submission of a Risk Management Plan (RMP), 40 CFR Part 68.

Prior to the inspection, EPA sent a certified Notice of Inspection 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 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:

RELEASE INFORMATION:

On June 30, 2021, the National Response Center (NRC) received a telephone report of an ammonia release at 1525 South 4th Street in Sunnyside Washington. The location was formerly a Seneca Foods Corporation processing and storage operation, but Seneca Foods had ceased operating in the fall of 2019. CraftAg LLC leased the warehouse portion of the building when Seneca Foods ceased operations.

The NRC release report was initiated by Mr. Gary Stapleton, the Vice President of operations for CraftAg LLC. EPA contacted Mr. Stapleton for more information on the release who then referred EPA to contact Mr. Larry Hull, the building manager. Mr. Hull provided as much information as he could, but neither him nor Mr. Stapleton knew much about the ammonia refrigeration equipment onsite as CraftAg LLC is only leasing the warehouse space and not using the refrigeration system. The ammonia refrigeration equipment has not been in use since the end of 2019. Mr. Hull referred EPA to Mr. Rick Wickersham, an engineer with Central Washington Refrigeration, a service contractor that responded to the release and closed the three-way valve for the pressure relief valves on the accumulator that was involved in the release. After the release, Mr. Wickersham replaced the pressure relief valves.

ON-SITE OBSERVATIONS:

The three EPA inspectors were escorted to the engine room located at the northwest corner of the warehouse by Mr. Hull, Mr. Stapleton, and Mr. Wickersham. The inspection team observed the ammonia condensers on the roof of the engine room (photo 1), processing equipment and the high-pressure receiver (photo 2 and 6), the two compressors located in the engine room (photo 3), the accumulator and pressure relief valves that were involved with the release (photo 4 and 5). Mr. Wickersham explained his understanding of why the release occurred. The ambient air temperature at the time of the release was in the 90-to-100-degree range and the refrigeration equipment, including the engine room ventilation fans, was not running. The excessive heat in the room caused the ammonia pressure to increase to the release point of the pressure relief valve (PRV). The PRV failed to reseal (close) after the pressure had been relieved causing a large amount of ammonia to be released to the outside atmosphere.

FOLLOW-UP COMMUNICATION:

On September 9, 2021, EPA received an email from Mr. Hull with a signed work order for removing the anhydrous ammonia from the system and decommissioning it. This is to be accomplished by Central Washington Refrigeration and the project is slated for completion on September 27, 2021.

INSPECTION REPORT CERTIFICATION:

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

Hales, Bob Digitally signed by Hales, Bob
Date: 2021.09.16 07:21:18
-07'00'

Inspector Signature

JAVIER MORALES Digitally signed by JAVIER MORALES
Date: 2021.11.01 13:27:38 -07'00'

RMP Coordinator/Approval

ERIN WILLIAMS Digitally signed by ERIN WILLIAMS
Date: 2022.02.03 09:27:13 -08'00'

EPCRA Coordinator/Approval

Jennifer A Sullivan Digitally signed by Jennifer A
Sullivan
Date: 2022.02.03 12:24:23 -08'00'

Land Enforcement Section Chief/Approval