



REGION 5

CHICAGO, IL 60604

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Bongards' Creameries – Perham, Perham, Minnesota

FROM: Charles Hall, Environmental Engineer
AECAB (MN-OH)

THRU: Brian Dickens, Section Chief
AECAB (MN-OH)

TO: File, Bongards' Creameries – Perham, Perham, Minnesota

BASIC INFORMATION

Facility Name: Bongards' Creameries - Perham (Bongards)

Facility Location: 110 3rd Avenue NE, Perham, Minnesota

Date of Inspection: 10 September 2024

EPA Inspectors:

1. Erin DuMontelle, U.S. EPA, Region 5, ECAD, AECAB, MI-WI Section
2. Charles Hall, U.S. EPA, Region 5, ECAD, AECAB, MN-OH Section

Other Attendees:

1. Chris Anderson, Corporate Environmental, Health, and Safety Director
2. Sue Flatau, Wastewater Technician
3. Bruce Johnson, Refrigeration Operator
4. Justin Larson, Plant Manager
5. Austin Plantz, Refrigeration Operator
6. DuWayne Schwarzrock, Maintenance Manager
7. Eric Spicher, Perham Environmental, Health, and Safety Manager
8. Ross Vettleson, Human Resources Manager

Contact Email Address: Justin.Larson@Bongards.com

Purpose of Inspection: CAA 112(r) inspection

Facility Type: Cheese and Whey Manufacturer

Regulations Central to Inspection: 40 C.F.R. Part 68

Arrival Time: 0840 hrs CDT

Departure Time: 1350 hrs CDT

Inspection Type:

- ☐ Unannounced Inspection
- ☒ Announced Inspection

PRE-INSPECTION REQUESTED DOCUMENTS

Before the inspection, the inspector requested and reviewed documents in the following categories:

1. Management structure in terms of RMP and who has responsibility for the different program elements and how that is documented;
2. Off-site Consequence Analysis supporting documentation;
3. Process Safety Information;
4. Process Hazard Analysis;
5. Operating Procedures specific to the covered process;
6. Lockout/Tagout procedures;
7. Training documentation on employees who operate and maintain the covered process;
8. Mechanical Integrity program procedures;
9. Management of Change written procedures;
10. Pre-Startup Safety Reviews completed in the covered process areas;
11. Compliance Audits, the two most recent audits, audit reports, findings of the audits, and how these findings have been resolved or corrected. (if applicable);
12. Incident Investigations performed for each of the covered processes, reports from the investigations, documentation on how the report findings and recommendations were addressed and resolved;
13. Employee participation plan of action regarding the implementation of the employee participation;
14. Hot work permit program/policy, examples of active permits issued for the processes;
15. Contractor policy, a list of contractors who have worked on or near the covered processes within the past two years, documentation on the safety performance and programs evaluated when selecting a contractor, work practices that control the entrance/exit or presence of contractors, documentation on how applicable provisions of the emergency response program are explained to contractors; and

16. Emergency Response Plan or Emergency Action Plan.

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection.
- ☐ Provided Small Business Resource Information Sheet.
- ☒ A Small Business Resource Information Sheet was not provided because Bongards is not a Small Business.
- ☒ Provided CBI warning to facility.

The following information was obtained verbally from the facility representatives.

Company Ownership: The company ownership has not changed in the last 5 years.

Process Description: Bongards owns and operates two ammonia refrigeration systems that use a total of 13,355 pounds of ammonia in the production of 500,000 pounds per day of various cheese varieties from 4.2 million pounds of milk per day.

Staff Interview: The staff interview used the RMP Program Level 3 Process Checklist as an outline and focused on questions in A10 through A12, B16, B23, D5, D11, D15, D16, D17, D19, D21, D26, D27 through D34, D36 through D39, D41, D47 through D54, D62, and Sections E, G, and H. The documents that Bongards provided in advance of the inspection answered the remaining questions.

TOUR INFORMATION

EPA Toured of the Facility: Yes.

Data Collected and Observations: The RMP Program Level 3 Process Checklist summarizes the observations of whether Bongards has the required documents in its Risk Management Plan. During the plant tour, the inspectors walked through both engine rooms to see the major components of each ammonia refrigeration system (ARS) and the pipework between them. The inspectors examined the pressure relief valves to determine whether each is current. Bongards maintains all records including piping and instrumentation diagrams, operating procedures, training records, and safety data sheets electronically. The inspectors reviewed these documents and the other documents listed above during the records review.

Photos were and **Videos** were not taken during the inspection.

Field Measurements were not taken during the inspection.

CLOSING CONFERENCE

- ☒ Provided U.S. EPA point of contact to the facility.

Additional Requested documents:

During the inspection, the inspectors requested the following additional documents:

- The proposal from Carlson Stewart Refrigeration,
- The Weekly Inspection Checklist for the Ammonia Refrigeration Systems,
- An example where an inspection revealed a problem,
- The Management of Change documentation for the replacement of the AAIMS with Egan controls,
- Ammonia Hose Inspection documentation, and
- The installation dates of pressure relief valves.

During the inspection, the inspectors asked the Bongards representatives to segregate previously submitted documents with CBI from those without CBI.

Compliance Assistance: The inspectors did not provide compliance assistance.

Concerns: The inspectors pointed out that thirteen standard operating procedures (SOPs) for ARS 1 and ten SOPs for ARS 2 have not been re-certified since March 2022. Further, for two SOPs for ARS 2, the next re-certification dates are coming up on September 26 and November 20, 2024. Some of the exit signage above the Engine Room doors and the Placards noting anhydrous ammonia inside the rooms need to be updated. Some of the pressure relief valves had tags that were double punched, and the relief discharge piping was possibly too close to condenser catwalks in Engine Rooms. There were also multiple ladders noted around the Facility leaning against ammonia piping as well as one short bridge to the condensers for Engine Room 1 that was braced on a high-pressure ammonia line.

DIGITAL SIGNATURES

CHARLES HALL  Digitally signed by CHARLES HALL
Date: 2024.09.30 09:08:17 -05'00'

Report Author:

BRIAN DICKENS  Digitally signed by BRIAN DICKENS
Date: 2024.09.30 11:27:28 -05'00'

Section Chief:

Facility Name: Bongards' Creameries – Perham

Facility Location: 110 3rd Avenue NE, Perham, MN

Date of Inspection: 10 September 2024

APPENDIX A: DIGITAL IMAGE LOG

Photographer: Charles Hall Camera: Olympus TG-6 #1 EPA Bar Code: SZ4061

File Name	Date and Time	Description of Image
P9100023.jpg	09/10/2024 11:21	NH3 monitor and Emergency Shut off to Engine Room 1.
P9100024.jpg	09/10/2024 11:22	NH3 detectors. Upper detector is the high high, i.e., 1%.
P9100025.jpg	09/10/2024 11:29	Compressor 3, Liquid Transfer 1, NH3 Suction Accumulator.
P9100026.jpg	09/10/2024 11:29	2nd angle of the same equipment.
P9100027.jpg	09/10/2024 11:33	Compressors 1, 2, and 4.
P9100028.jpg	09/10/2024 11:35	NH3 detector for Zone 9.
P9100029.jpg	09/10/2024 11:35	NH3 detector for Zone 9.
P9100030.jpg	09/10/2024 11:37	Chester Jensen #2.
P9100031.jpg	09/10/2024 11:43	Chester Jensen #1.
P9100032.jpg	09/10/2024 11:45	NH3 detector for Zone 8. Display panels in control rooms.
P9100033.jpg	09/10/2024 11:56	Entry to Engine Room 2. NH3 monitor and Emergency stop.
P9100034.jpg	09/10/2024 11:59	Control Panel for Engine Room 2.
P9100035.jpg	09/10/2024 12:00	Compressors 1, 2, and 3 (from right to left). Compressors at far left are for the new glycol system and are not operating yet.
P9100036.jpg	09/10/2024 12:02	High Temperature Recirculation (white) and High Pressure Receiver (orange).
P9100037.jpg	09/10/2024 12:04	NH3 detector and Alarm light in Engine Room 2.
P9100038.jpg	09/10/2024 12:06	Compressor 3.
P9100039.jpg	09/10/2024 12:10	Automatic and Manual King Valves.
P9100040.jpg	09/10/2024 12:26	Cheese Cooler Penthouse #1.
P9100041.jpg	09/10/2024 12:28	NH3 detector inside Cheese Cooler Penthouse #1.
P9100042.jpg	09/10/2024 12:30	Cheese Cooler Penthouse #3.
P9100043.jpg	09/10/2024 12:32	All four Cheese Cooler Penthouses.
P9100044.jpg	09/10/2024 12:37	Manual Liquid Line King Valve for High Pressure Receiver 1.
P9100045.jpg	09/10/2024 12:55	High Pressure Receiver 1.
P9100046.jpg	09/10/2024 12:56	High Pressure Receiver 1 including its King Valve.
P9100047.jpg	09/10/2024 12:56	High Pressure Receiver 1 and Evaporative Cooler 1.
P9100048.jpg	09/10/2024 13:00	Evaporative Cooler 1 and Evaporative Cooler 3 (partial).
P9100049.jpg	09/10/2024 13:01	Evaporative Coolers 1, 2, and 3.
P9100050.jpg	09/10/2024 13:03	NH3 Relief Pipe. Ladder to upper level of Evaporative Cooler 1.
P9100051.jpg	09/10/2024 13:07	Evaporative Cooler 2.
P9100052.jpg	09/10/2024 13:08	Pressure Relief Valves on Evaporative Cooler 2.
P9100053.jpg	09/10/2024 13:16	Ladders by Evaporative Cooler 2 and Evaporative Cooler 3.