

Clean Air Act - Section 112(r) Risk Management Program and EPCRA 312 – Tier II Facility Desk Audit Report

FACILITY INFORMATION:

Name: Sysco Alaska, Inc.
Physical Address: 6601 Change Point Drive, Anchorage, Alaska
Phone Number: (907) 444-6840
Latitude/Longitude: 61.16183/-149.90472
EPA Facility ID# 100000237004

CONTACT INFORMATION (RMP Implementation):

Name: Joshua West
Phone Number: (907) 444-6840
E-mail: Joshua.West@Sysco.com

EMERGENCY CONTACT INFORMATION:

Name: Joshua West
Phone (24-hr): Facilities Technician
E-mail: Joshua.West@Sysco.com
Website: www.sysco.com

AUDIT DETAILS:

Contact Date: 9/2/2021
Inspector: Peter Phillips, US EPA Region 10 SEE Grantee, Lead RMP Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: 11/10/2017
Date of Latest Update: 11/10/2017

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)
1000083593	Ammonia Refrigeration	1000104261	42441	3	Ammonia, Anhydrous (7664-41-7)	15,000

PURPOSE:

The purpose of this document review 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 and compliance with Section 312 of the Emergency Planning and Community Right to Know Act (EPCRA) which requires the Tier II Chemical Inventory Reports to be submitted annually. EPA Region 10 RMP inspectors will not be conducting onsite inspections due to the COVID-19 pandemic requiring restricted travel and social distancing by the Centers for Disease Control (CDC) to prevent the spread of COVID-19. EPA Region 10 will coordinate with the RMP facility to schedule an onsite inspection when the CDC has determined it is safe.

- The facility has been previously inspected in the past 5 years: No ☒ Yes ☐
- Is the emergency contact information current? 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 ☐

If Yes, Date and Description of the Release:

EPCRA TIER II REPORTING HISTORY:

Did the facility submit their 2020 Tier II report to the SERC? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 2/23/2021

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

If Yes, Date the Tier II was submitted: 2/23/2021

GENERAL INFORMATION:

The facility is regulated under the Risk Management Program as a Program Level 3 process and is owned and operated by Sysco Alaska, Inc (Sysco) whose parent company is the Sysco Corporation. Sysco started as a subsidiary of Sysco Seattle in 2004 leasing the property from Pokel Management, Green Bay, Wisconsin. In 2014, the Alaska facility was purchased from Pokel Management by Sysco and started doing business as Sysco Alaska, Inc. Sysco distributes a full line of food products and a wide variety of non-food products to both independent and chain restaurant customers in 90 countries. Sysco reported an anhydrous ammonia inventory of 15,000 pounds in their RMP exceeding the threshold quantity of 10,000 pounds of anhydrous ammonia for their refrigeration system. There are 60 full-time employees on site.

Sysco did not submit an RMP to EPA when the Alaska facility was purchased in 2014. In 2017, they conducted a compliance audit and determined that the total anhydrous ammonia inventory exceeded the 10,000-pound threshold requiring an RMP.

INFORMATION REQUESTED FROM FACILITY:

1. Process Hazard Analysis – last 2 PHAs or revalidations
2. Compliance Audit – last 2 compliance audit reports
3. Training – initial and refresher operator/maintenance training on SOPs and safe work practices
4. Tier II submission verification

ANALYSIS OF DOCUMENTATION SUBMITTED:

The following timeline is provided to provide context to the analysis of documents submitted:

Year	Event	Comment
2004	Sysco Seattle started operations. Leasing property from Pokel Management, Green Bay, Wisconsin.	No RMP.
2011	PHA conducted by Sysco Seattle.	10 items open and differed to 2017 PHA; no mention of filing an RMP with EPA.
2014	Facility purchased from Pokel Management and DBA as Sysco Alaska.	No RMP submitted to EPA.
2016	PHA was due.	PHA not conducted.
2017	PHA was conducted.	1 year late, no open items.

Year	Event	Comment
2017	Compliance audit was conducted.	Ammonia inventory recalculation was recommended.
2017	First RMP submitted to EPA.	Ammonia inventory recalculation exceeds 10,000 pounds threshold quantity.
2020	Compliance audit was conducted.	No open items.

1. **Process Hazard Analysis (PHA):** Sysco provided their 2011 and 2017 PHA revalidations. The 2011 PHA revalidation finalized on 7/21/2011. Ten findings and recommendations items were deferred to the 2017 PHA revalidation. The 2017 PHA revalidation was finalized on 6/21/2017 as reported in their RMP. The 2017 PHA shows that all findings and recommendations were completed or assigned completion dates no later than 7/9/2020. The 2017 PHA revalidation was completed six years after the 2011 PHA.
2. **Compliance Audit:** Sysco provided their 2017 and 2020 Compliance Audit reports including finding tracking sheets. The 2017 Compliance Audit findings were finalized by 7/26/2019. The 2020 Compliance Audit has finding Item #1 open to correct the emergency contact information in their RMP. The other 2020 audits findings were finalized by 7/31/2020 except for an ongoing issue with fire alarm system and is working with AK OSHA. Sysco is performing their compliance audits at least every three years.
3. **Training:** Sysco provided training documentation for their two operators for their initial and refresher training. The training included the facility's Standard Operating Procedures (SOP) and safe work practices. Their operators perform a walkthrough of the refrigeration system using the SOPs. All operators acknowledged that they received and understood the training by initialing subject training documentation. According to their RMP, Sysco indicates that a written test is used for competency. Sysco did not provide completed written tests for their operators.

AREAS OF CONCERNS:

1. **PHA:** Sysco did not promptly address the 2011 PHA findings and recommendations and deferred them to the 2017 PHA revalidation for completion.
2. **PHA:** Sysco conducted their 2017 PHA revalidation six years after their 2011 PHA which was due in 2016.
3. **Compliance Audits:** Sysco did not promptly correct the deficiency identified in the 2020 audit finding Item #1 to correct the contact information in their RMP within one month. The emergency contact name listed in Sysco's 2017 RMP is Josh West. Mr. West left the company in 2018. The current emergency contact is Don Petersen.
4. **RMP:** Sysco did not correct their emergency contact information within thirty days of the change. The 2020 Compliance Audit finding Item#1 identified this deficiency. The emergency contact name listed in Sysco's 2017 RMP is Josh West. Mr. West left the company in 2018. The current emergency contact is Don Petersen.

The findings in this report will be discussed with the facility via telephone and email after certification of this report.

DOCUMENTS REQUESTED ON FOLLOW-UP:

No follow-up documentation was requested.

AUDIT 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:

RMP Coordinator/Approval

Date

EPCRA Coordinator/Approval

Date

Land Enforcement Section Chief/Approval

Date