



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE: See Date of Section Chief Signature Below

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Sysco Food Service – Freezer, Des Plaines, Illinois

FROM: Natalia Vazquez, Environmental Engineer
AECAB (MI/WI)

THRU: Sarah Marshall, Section Chief
AECAB (MI/WI)

TO: File

BASIC INFORMATION

Facility Name: Sysco Food Service - Freezer

Facility Location: 501 S. Wolf Road, Des Plaines, Illinois 60016

Date of Inspection: September 27-29, 2021

EPA Inspector(s):

1. Natalia Vazquez, Environmental Engineer
2. Greg Chomycia, Environmental Engineer
3. Manojkumar Patel, Environmental Engineer

Other Attendees:

1. Victor Arciga, Fleet and Facility Maintenance Director
2. Andre Harris, Safety Director

Contact Email Address: victor.arciga@sysco.com

Purpose of Inspection: compliance with Clean Air Act (CAA) 112r

Facility Type: wholesale food distributor and warehouse

Regulations Central to Inspection: Level 3 Program under CAA 112r

Arrival Time: 9/28/2021 9:00am

Departure Time: 9/28/2021 4:00pm

Inspection Type:

- ☐ Unannounced Inspection
- ☒ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☐ Provided Small Business Resource Information Sheet
- ☒ Small Business Resource Information Sheet not provided. Reason: Will be provided with inspection report
- ☒ Provided CBI warning to facility

This inspection included a virtual Microsoft TEAMS opening conference on September 27, 2021; a site visit on September 28, 2021; and a virtual closeout conference on September 29, 2021. The following information was obtained verbally from Victor Arciga and Andre Harris unless otherwise noted.

Process Description:

Sysco Food Service (“Sysco”) has on site two Level 3 processes under the CAA 112r. EPA inspectors focused on one of the processes which is refer to as the “freezer” and this report is limited to the freezer process. The ammonia refrigeration is in operations 24 hours, 7 days of the week. Most employees are present Sunday through Friday. Saturdays has almost no employees on site. The warehouse freezer has about 70 employees. Ten maintenance employees are shared by the freezer building and the other building. The facility has a union representing the staff but does not represent the maintenance staff. The freezer warehouse was built in 2008. The freezer is a warehouse building that is refrigerated at 0 °F with multiple doors for trucks. The warehouse has an engine room that contains a high-pressure receiver (HPR) vessel, high temperature pump recirculator (HTPR) vessel, low temperature pump recirculator (LTPR) vessel, low-low temperature suction trap (LLTST) vessel and four compressors. The fourteen evaporators are in the roof, some of the evaporators were inside several penthouses (two or four per penthouse).

Staff Interview:

The Risk Management Plan available in the EPA database before the inspection had Jason Briana as the emergency contact. Mr. Briana left in February 2021.

The facility has had no accidents, spills or major leakage.

Sysco has an in-house response group for ammonia releases as long as the concentration is below 250 ppm. Once the ammonia concentration reaches 250 ppm, the facility requires its response group to vacate the building and it calls the fire department (HAZMAT team). The response

group has cartridge respirators and two-way radios as part of their emergency equipment. The cartridge respirators can protect up to 250 ppm. The facility had the fire department on site in February 2021 for a tour of the facility. The facility hasn't done a drill exercise with in-house response group since COVID-19 pandemic started in March 2020. Ammonia detectors (sniffer) are calibrated once a year.

The facility has infrequent additions of ammonia. According to Steve Adams (staff member that works in ammonia refrigeration process) the facility installed a new ammonia addition station 3 to 4 years ago. The facility's representatives were not able to locate an MOC and pre-startup safety review for the ammonia addition station.

The facility started using a software called ePSM to maintain its 112r related records.

The facility has three main contractors:

1. Harbor Environmental and Safety - provides assistance with 112r program and helped develop the ePSM,
2. Dual Temp - responsible for preventative maintenance, assist fix issues, on call for accidents/emergency, and
3. F.E. Moran – preventative maintenance, emergency, ammonia sensor calibration.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

Eric Esparza assisted Mr. Arciga and Mr. Harris during the site tour.

EPA inspectors observe corrosion at the bottom of the high temperature pump recirculator (HTPR) vessel.

Compressor RC-1 was built in 2008 and had its pressure relief valve replaced 2018.

Photos and/or Videos: were taken during the inspection.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

The following records were provided by the facility through a OneDrive web-link, before the inspection.

1. Site map
2. P&ID diagrams
3. Off-site Consequence Analysis – CBI

4. Process Safety Information
5. 2018 Process Hazard Analysis
6. Process Hazard Analysis Policy
7. Emergency Response and Evacuation Plan and Ammonia Emergency Procedures
8. 2019 Five-year Mechanical Integrity Report
9. 2018 and 2020 PSM Audits
10. 2008 Pre-startup safety review of the ammonia refrigeration system
11. Ammonia safety data sheet (Airgas)
12. Relief valve calculation

CLOSING CONFERENCE

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

Requested documents:

1. Management
2. Ventilation Room calculations
3. Release system pressure relief valve and header
4. Compressors, Evaporators, HPR vessel, HTPR vessel, LTPR vessel, LLTST vessel standard operating procedures (SOP)
5. 2020 and 2021 SOP certification
6. Training Policy
7. Level 1 and Level 2 training description
8. Employee Participation Policy
9. Cooler and Freezer Charging lines proposal (July 19, 2019)
10. Mechanical Integrity Resolution list (recommendation tracking)
11. Process Hazard Analysis Resolution list (recommendation tracking)
12. Ammonia invoices, including initial ammonia invoice (September 25, 2008)

Concerns:

1. Facility doesn't have the Safe Upper and Lower Limits information pertaining to the technology of the process for temperatures, pressures, flows or compositions (the limits in the SOP appear to be operational limits)
2. Release scenario doesn't document what information the facility relied on to identify environmental receptors
3. Facility is not implementing its Management of Change and/or Pre-Startup Safety Review policies after a change in process.
4. According to the Emergency Plan, the facility waits until the ammonia concentration reaches 250ppm to call the fire department. Cartridge respirators used by emergency responding staff protects only up to 250 ppm of ammonia. This could lead to responding staff being in a dangerous situation and a delay in the emergency response.
5. The Risk Management Plan in the database still has an outdated emergency contact.

DIGITAL SIGNATURES

Report Author: NATALIA VAZQUEZ RIVERA

Digitally signed by NATALIA VAZQUEZ RIVERA
Date: 2021.11.01 09:04:48 -05'00'

Section Chief: _____

Facility Name: Sysco Food Service Freezer

Facility Location: 501 S. Wolf Road, Des Plaines, Illinois 60016

Date of Inspection: September 28, 2021

APPENDICES AND ATTACHMENTS

1. Digital Image Log
2. Inspection Checklist

Facility Name: Sysco Food Service Freezer
Facility Location: 501 S. Wolf Road, Des Plaines, Illinois 60016
Date of Inspection: September 29, 2021

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Greg Chomycia	2. Archival Record Location: <i>OneDrive</i>
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Latitude and Longitude	Description of Image
1	IMG_0345.JPG	2021:09:28 09:19:28	42.043194, -87.910156	Freezer Engine Room Door
2	IMG_0346.JPG	2021:09:28 09:20:05	42.043144, -87.91095	Freezer Engine Room Second Door
3	IMG_0347.JPG	2021:09:28 09:27:51	42.043167, -87.910661	HPR-1 Vessel
4	IMG_0348.JPG	2021:09:28 09:27:57	42.043158, -87.910828	HPR-1 Vessel Plate
5	IMG_0349.JPG	2021:09:28 09:28:05	42.043378, -87.910867	HTPR Vessel
6	IMG_0350.JPG	2021:09:28 09:28:33	42.0438, -87.910872	HTPR Vessel Plate
7	IMG_0351.JPG	2021:09:28 09:30:51	42.042969, -87.910744	HTPR Pump
8	IMG_0352.JPG	2021:09:28 09:32:44	42.043442, -87.911156	HTPR Oilpot
9	IMG_0353.JPG	2021:09:28 09:34:01	42.043053, -87.910819	RC-1 Service Record
10	IMG_0354.JPG	2021:09:28 09:34:48	42.043133, -87.911514	RC-1 PRV
11	IMG_0355.JPG	2021:09:28 09:35:48	42.0434, -87.911164	RC-1
12	IMG_0356.JPG	2021:09:28 09:44:48	42.043622, -87.911033	Roof Pipping
13	IMG_0357.JPG	2021:09:28 09:55:03	42.043483, -87.90995	Evaporator EV-11 in Penthouse
14	IMG_0358.JPG	2021:09:28 10:02:55	42.044406, -87.910278	Float Valve
15	IMG_0359.JPG	2021:09:28 10:08:15	42.044572, -87.911111	PRV Evaporator no. 10 (flooded evaporator) with surge tank
16	IMG_0360.JPG	2021:09:28 10:09:44	42.044575, -87.911111	Evaporator Surge Tank Plate
17	IMG_0361.JPG	2021:09:28 10:09:45	42.044575, -87.911111	Evaporator Surge Tank Plate

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18	IMG_0362.JPG	2021:09:28 14:27:14	42.043514, -87.911142	Ammonia Loading Valves
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