EPA United States Environmental Protection Agency

Region 6 Compliance Assurance and Enforcement Division

INSPECTION REPORT

Inspection Date(s):	02/18/2020		
Media:	Air		
Regulatory Program(s)	RMP		
Company Name:	**Ruiz Food Products, Inc.**		
Facility Name:	**Ruiz Food Products, Inc.**		
Facility Physical Location:	2410 Texoma Drive		
(city, state, zip code)	Denison, TX 75020		
Mailing address:	501 South Alta Avenue		
(city, state, zip code)	Dinuba, California 93618		
County/Parish:	Tulare		
Facility Contact	Josh Poormohammadi (903) 647-8816	Safety Manager	
FRS Number:	FRS: 110034472540		
Identification/Permit Number:	N/A		
Media Number:	RMP #: 1000 0019 3391		
NAICS:	311412 Frozen Specialty Food Manufacturing		
SIC:			
Personnel participating in inspection:			
Josh Poormohammadi	Ruiz Food Products, Inc.	Safety Manager	
Don Geddings	Ruiz Food Products, Inc.	Sr. Maintenance Manager	
Tim Reeves	Ruiz Food Products, Inc.	Refrigeration Supervisor	
Ignacio Albarran	Ruiz Food Products, Inc.	Safety Director	
Mitch Martin	Ruiz Food Products, Inc.	Director of Operations	
EPA Lead Inspector Signature/Date	BLAKE SIEMINSKI Digitally signed by BLAKE SIEMINSKI DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=BLAKE SIEMINSKI, 0.9.2342.19200300.100.1.1=68001003655816 Date: 2020.04.16 10:48:06 -05'00'		
	Blake Sieminski		Date
Supervisor Signature/Date	SAMUEL TATES Digitally signed by SAMUEL TATES DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=SAMUEL TATES, 0.9.2342.19200300.100.1.1=68001003655433 Date: 2020.04.16 10:54:46 -05'00'		
	Samuel Tates		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

I, U.S. Environmental Protection Agency (EPA) Region 6 Inspector Blake Sieminski, arrived at Ruiz Food Products, Inc. (RFP or facility) at 8:30 a.m. on February 18, 2020, for an announced inspection. I convened an opening conference and met with several representatives from the facility (as denoted in the cover page above). I presented my credentials to the opening conference attendees and informed them that this was an EPA inspection to determine compliance with the Clean Air Act (CAA) Sections 112(r)(1) and 112(r)(7). The scope of the inspection was a partial compliance evaluation of the facility pursuant to 40 C.F.R. Part 68 – Chemical Accident Prevention Provisions.

FACILITY DESCRIPTION

RFP handles one regulated substance above threshold quantity subject to the Risk Management Program (RMP) regulations, Anhydrous Ammonia (105000lbs per submitted Risk Management Plan). This is a refrigerated warehousing and storage facility. The regulated chemical is used in an ammonia refrigeration system. Approximately 750 full time employees work at this facility.

Section II - OBSERVATIONS

40 C.F.R. Part 68 – CHEMICAL ACCIDENT PREVENTION PROVISIONS

Subpart A – General

40 C.F.R. § 68.10 Applicability - I observed that RFP is a stationary source, with a CAA Title V permit, which has more than a threshold quantity of a regulated substance in a process. RFP re-submitted a Risk Management Plan (5-year update as required by 40 CFR 68.190 (b)(1)) on October 15, 2015, which described the process containing anhydrous ammonia held at more than a threshold quantity.

40 C.F.R. § 68.12 General Requirements - I reviewed the re-submission of RFP's Risk Management Plan dated October 15, 2015, which identifies one toxic chemical in a Program Level 3 process.

40 C.F.R. § 68.15 Management - RFP developed a management system to oversee the implementation of the RMP elements. The organizational chart that was provided to me outlined the positions to implement the individual elements of the RMP, as required by this subpart.

Subpart B – Hazard Assessment

40 C.F.R. § 68.20 Applicability - RFP is a Program 3 stationary source subject to this subpart. The facility is required to prepare an offsite consequence analysis and complete a five-year accident history.

40 C.F.R. § 68.22 Offsite Consequence Analysis parameters - I reviewed the offsite consequence analysis and supporting documentation. I reviewed the documents and discussed with Josh Poormohammadi to assure the data was accurate.

40 C.F.R. § 68.25 Worst-case Release Scenario Analysis - RFP identified and documented a worse-case release scenario analysis for the RMP covered toxic substance. The distance to endpoint was done by using the methodology in the RMP Offsite Consequence Analysis Guidance. The distance to the endpoint for the toxic substance was calculated using RMP*Comp™.

40 C.F.R. § 68.28 Alternative Release Scenario Analysis - RFP identified and analyzed at least one alternative release scenario for a toxic substance held in the covered process. The distance to the endpoint was calculated using RMP*Comp™.

40 C.F.R. § 68.30 Defining Offsite Impacts-Population - I discussed with RFP personnel about the completed offsite consequence analysis. RFP used the year 2010 Census Bureau population data to calculate population numbers reported in their Risk Management Plan.

40 C.F.R. § 68.33 Defining Offsite Impacts-Environment - RFP provided maps that identified the potential offsite impacts and identified public receptors.

40 C.F.R. § 68.36 Review and Update - I reviewed RFP's documentation that illustrated reviews and updates regarding the offsite consequences are occurring at least every five years.

40 C.F.R. § 68.39 Documentation - RFP provided documents of the offsite consequence analysis data. For worst-case and alternative case scenarios, a description of the vessel or pipeline, the substance selected as worst-case, and the rationale for selection was included; likewise, assumptions included use of any administrative controls and any passive mitigation that were assumed to limit the quantity that could be released, estimated quantity released, release rate, and duration of release. The methodology used to determine distance to endpoint was documented by the facility. The data used to estimate population was provided in the form of maps that had the distance to endpoint labeled with a circle from the emission point.

40 C.F.R. § 68.42 Five-year Accident History - RFP did not report any accidental releases in their RMP, which resulted in deaths, injuries, evacuations, or property damage.

Subpart D – Program 3 Prevention Program

40 C.F.R. § 68.65 Process Safety Information - I reviewed various process safety information for the RMP units at RFP. All the information I reviewed met the requirements of this subpart.

40 C.F.R. § 68.67 Process Hazard Analysis - I reviewed the Process Hazard Analysis (PHA) for the RMP process. The PHA was conducted using the Hazard and Operability Study analysis technique.

40 C.F.R. § 68.69 Operating Procedures - I reviewed the operating procedures that were requested from RFP. RFP uses a paper and electronic document management system to maintain its operating procedures. I reviewed and discussed with RFP personnel operating procedures, which included the Standard Operating Procedure certification procedure, confined space entry, and lockout/ tag out procedures. I observed, based on RFP provided documentation, that their operating procedures were certified, current, accurate, and that procedures had been reviewed as often as necessary. RFP used a single certification document for certifying operating procedures annually and met all the requirements of this subpart.

40 C.F.R. § 68.71 Training - I requested and was provided the training files for randomly selected employees at various experience levels. Of the employee files reviewed, refresher training had been provided at least every three years.

40 C.F.R. § 68.73 Mechanical Integrity - I requested and was provided mechanical integrity records for inspections of RMP covered equipment and the written procedure for maintaining the integrity of the process.

40 C.F.R. § 68.75 Management of Change (MOC) - I reviewed RFP's written procedure for MOC and discussed the documentation with site personnel.

40 C.F.R. § 68.77 Pre-startup Review - RFP provided documentation regarding its pre-startup safety review process.

40 C.F.R. § 68.79 Compliance Audits - I requested and reviewed the last two RMP compliance audits.

40 C.F.R. § 68.81 Incident Investigation - I requested a complete list of incident reports/ investigations, which resulted in, or could reasonably have resulted in, a catastrophic release of a regulated substance for the last five years. RFP did not have any incident reports/ investigations that met these criteria.

40 C.F.R. § 68.83 Employee Participation - I reviewed RFP's written plan of action regarding employee participation and its implementation in their RMP. RFP's written plan met the requirements of this subpart.

40 C.F.R. § 68.85 Hot Work Permit - I discussed the process for conducting hot work onsite and reviewed several hot work permits. The hot work permits that I reviewed looked satisfactory and met the requirements of this subpart.

40 C.F.R. § 68.87 Contractors - RFP assured me that all contractors that may work onsite have been trained on the potential hazards related to both the process equipment and the work that the contractor may perform.

Subpart E – Emergency Response

40 C.F.R. § 68.90 Applicability – RFP employees are first responders that respond to accidental releases of regulated substances.

40 C.F.R. § 68.95 Emergency Response Program – I requested and reviewed the RFP's Emergency Response Plan and discussed the Emergency Response Program with appropriate RFP personnel.

Subpart G - Risk Management Plan

40 C.F.R. § 68.190 Updates - RFP's Risk Management Plan was re-submitted on October 15, 2015 and there have been no updates since this re-submission.

40 C.F.R. § 68.195 Required Corrections - The next RMP re-submission is due by October 15, 2020, unless an update or correction is required by 40 C.F.R. § 68.190 and § 68.195.

Section III – AREAS OF CONCERN

I conducted a closing conference at RFP at approximately 2:15pm on February 18th. During the closing conference, I noted that no Areas of Concern were observed during the inspection.

Section IV – FOLLOW UP

No additional information was received by EPA after exiting the Facility.

Section V – LIST OF APPENDICES

Appendix 1 – Checklist
Key: Y – Yes, N-No, N/A – Not Applicable, M-Marginal, U-Unsatisfactory.