



**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)
Risk Management Program
and EPCRA 312 – Tier II
Facility Inspection Report**

FACILITY INFORMATION:

Company Name: High Purity Products, Inc.
Facility Name: Front Avenue
Physical Address: 5740 NW Front Avenue
Portland, OR 97210
Phone Number: 503-548-6355
Latitude/Longitude: (45.56430, -122.516788)
RMP Facility ID#: 1000 0023 9397
FRS ID#: –
EJ Concerns: Yes (Above 80%)

CONTACT INFORMATION (RMP Implementation):

Name: Andrew Demos EH&S Specialist
Phone Number: 925-788-7745
E-mail: andrewd@highpp.com

EMERGENCY CONTACT INFORMATION:

Name: Logan Rounsevelle
Phone (24-hr): 503-548-6355
E-mail: logan@highpp.com
Website: highpurityproducts.com

TRIP DETAILS:

Inspection Date: March 17, 2023
Inspection Time: 09:00 through 12:15
EPA Inspection Team:

Edward Johannes, US EPA Region 10 SEE Grantee, Lead RMP Inspector/EPCRA Inspector
Terry Garcia, US EPA Region 10 SEE Grantee, RMP Inspector
Peter Phillips, US EPA Region 10 SEE Grantee, RMP Inspector
Mhara Coffman, US EPA Region 10, RMP Inspector
Taylor Law, Weston Solutions, Inc., EPA START Contractor

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: November 29, 2022

Date of Latest Update: November 29, 2022

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)
1000104726	Storage/Shipping	1000131199	325998	2	Hydrochloric acid (7647-01-0)	110,000 (37% concentration or greater)
1000104726	Storage/Shipping	1000160522	325998	2	Ammonia, Aqueous (7664-41-7)	166,000 (20% concentration or greater)
1000128041	Repacking	1000160553	325998	2	hydrochloric acid (7647-01-0)	24,800 (37% concentration or greater)
1000128041	Repacking	1000160554	325998	2	Ammonia, Aqueous (7664-41-7)	21,000 (20% concentration or greater)
1000128042	Bulk Transferring	1000160555	325998	2	Hydrochloric acid (7647-01-0)	24,825 (37% concentration or greater)
1000128042	Bulk Transferring	1000160556	325998	2	Ammonia, Aqueous (7664-41-7)	21,000 (20% concentration or greater)

PURPOSE:

The purpose of this inspection was to determine if 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.

- The facility has been previously inspected in the past 5 years: No ☒ Yes ☐

If Yes, Date of Last Inspection: None

- 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:***EPCRA TIER II REPORTING:**Did the facility submit the [Enter Year] Tier II report to the SERC? No ☐ Yes ☒*If Yes, Date the Tier II was submitted:* 2-14-2023*If No, calendar year of the most recent Tier II:*

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

If Yes, Date the Tier II was submitted: 2-14-23

INSPECTION ENTRY:

The EPA Inspection Team (EPA) led by Mr. Edward Johannes arrived at the premises of High Purity Products, Inc. Front Avenue facility (facility) in Portland, Oregon, at 08:45 and was joined by the following facility personnel:

Name	Title, Organization
Andrew Demos	EH&S Specialist - High Purity Products (HPP)
Bhaskar Choudhury	President - HPP
Logan Rounsevelle	Production Manager - HPP
Daniel Williams	Director of Quality - HPP
David Marsolek	Director of Production - HPP
Paul Smith	Lab Manager - HPP

Was a state/county/or local emergency representative present? No ☐ Yes ☒

If Yes, Name and Title of Representative: Bryan Profit

The facility is a first responder: No ☒ Yes ☐

If No, Responding Agency: Portland Fire Department

Facility representatives escorted EPA to the facility's office/conference room. Lead Inspector Edward Johannes introduced all parties present, provided a summary of the Risk Management Program (RMP), and explained the purpose of the visit. Each EPA Inspector 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. Mr. Andrew Demos EH&S Specialist of HPP gave a brief description of the facility, operations, and personal protective equipment required for the tour.

Prior to the inspection, EPA sent a certified notice of inspection letter to the facility on February 27, 2023, 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 that 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. A corrected second notice was sent out on March 14, 2023, informing the facility that the inspection was for Program Level 2 requirements, not for Program Level 3 requirements as was stated in the original notice.

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: Mr. Andrew Demos EH&S Specialist

GENERAL INFORMATION:

The facility is regulated under RMP rule a Program Level 2 facility and is owned and operated by High Purity Products, Inc. (HHP) whose parent company is Cascade Columbia Distribution. Operations at the facility began in 2003. HPP is a full line supplier of the highest purity acids, bases, solvents, and etchants used for semiconductor applications. The facility receives ISO tank containers (ISOtainers) of bulk product, which it repackages to into gallon bottles, pails, carboys, drums, and totes for the semiconductor industry. The ISOtainers are offloaded at a dock, where the bulk product is repackaged after going through a filtration transfer system. The facility stores the bottles of repackaged product in specified storage rooms inside the main facility building. HHP has 18 full-time employees on site, 14 of whom are trained as Operators.

ON-SITE OBSERVATIONS:

EPA toured the facility from approximately 0930 hours to 1015 hours, escorted by facility representatives Mr. Andrew Demos, Mr. Bhaskar Choudhury, Mr. Logan Rounsevelle, Mr. Daniel Williams, Mr. David Marsolek, and Mr. Paul Smith. EPA observed the covered chemical storage facility process and repackaging of product for the semiconductor industry. Photographs taken during the inspection are included in Attachment A to this report.

EPA observed operations in the Clean Room Lab and Shipping/Receiving Area, which comprise the majority of the facility interior. The Clean Room Lab serves as a lab and staging area for chemical repackaging (Photo 1) and is adjacent to the Shipping/Receiving Area. The facility receives bulk chemical product from delivery trucks in the Shipping/Receiving Area (Photos 2 and 3). EPA observed a filtration system dedicated to processing ammonium hydroxide between the receiving doors (Photos 4 and 5), hydrochloric acid (HCL) repackaging operations in the Clean Room Lab (Photos 6 and 8). Process safety practices observed in the Clean Room Lab and Shipping/Receiving Area include an eyewash station and hazard communication signage posted on the access door leading to the Scrubber Room (Photos 9 and 10).

EPA observed exhaust system components housed in the Scrubber Room, including a dual unit exhaust system, ventilation pipe, control panels, pumps, and compressors (Photos 11-20).

EPA observed exterior areas of the facility, including a parking/storage area for ISOtainers (Photos 21-25), and nitrogen storage tank (Photos 26 and 27).

Storage rooms in the facility interior provide separate, dedicated storage areas for a variety of chemicals including ammonia, HCL, flammable products, and corrosives. EPA observed the Flammables and Corrosives Rooms which included fire extinguishers, emergency shower/eyewash stations, and hazcom signage (Photos 28-36).

After touring the RMP-covered process areas at the facility, EPA returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to Mr. Andrew Demos, Mr. Bhaskar Choudhury, Mr. Logan Rounsevelle, Mr. Daniel Williams, Mr. David Marsolek, and Mr. Paul Smith.

INFORMATION COLLECTED FROM FACILITY:

1. Safety Data Sheet for Ammonium Hydroxide
2. Safety Data Sheet for Hydrochloric Acid
3. List of Trained of Employees for Container Drum disposal process
4. Example of empty container disposition training quiz
5. Facility Compliance and Audit Report package
6. Visitor Conduct Guide
7. Copy of Emergency Response Plan package with Site Figures

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

No areas of concern were identified during the inspection.

DOCUMENTS REQUESTED NOT INCLUDED IN REPORT:

The following documents were requested during the inspection but are not included in this report. These documents will still be reviewed to determine compliance with Section 112(r) of the Clean Air Act.

During the inspection, no follow-up document requests were made requiring further review.

INSPECTION REPORT CERTIFICATION:

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

EDWARD JOHANNES Digitally signed by EDWARD
(Affiliate) JOHANNES (Affiliate)
Date: 2023.07.07 13:14:33 -07'00'

Inspector Signature

JAVIER MORALES Digitally signed by JAVIER
MORALES
Date: 2023.07.10 11:08:19 -07'00'

RMP Coordinator/Approval

ERIN WILLIAMS Digitally signed by ERIN
WILLIAMS
Date: 2023.07.12 15:07:50 -07'00'

EPCRA Coordinator/Approval

MATTHEW Digitally signed by MATTHEW
QUARTERMAN QUARTERMAN
Date: 2023.07.17 15:25:19 -07'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: Front Ave RMP Inspection

City, State: Portland, Oregon

Photographer: Taylor Law

File	Photo Layout ID	Date	Time	Description
1	1.jpg	3/17/2023	09:41am	Overview of Clean Room, Lab, and Staging/Receiving area.
2	2.jpg	3/17/2023	09:41am	Overview of Dock/Shipping receiving down-downpack area with Ammonium Hydroxide transfer system.
3	3.jpg	3/17/2023	09:41am	Exit doorway adjacent to Docks/Shipping receiving area.
4	4.jpg	3/17/2023	09:43am	Ammonium Hydroxide transfer and filtration system.
5	5.jpg	3/17/2023	09:46am	Ammonium Hydroxide transfer and filtration system.
6	6.jpg	3/17/2023	09:47am	Clean Room Lab, HCL downpack operations
7	7.jpg	3/17/2023	09:50am	Clean Room Lab, HCL downpack operations
8	8.jpg	3/17/2023	09:50am	Clean Room Lab, HCL downpack operations
9	9.jpg	3/17/2023	09:50am	Clean Room Lab, eyewash station adjacent to scrubber/exhaust system
10	10.jpg	3/17/2023	09:50am	Shipping / Receiving Area, hazard communication (hazcom) signage at access door to Scrubber Room
11	11.jpg	3/17/2023	09:50am	Scrubber Room, dual unit exhaust system
12	12.jpg	3/17/2023	09:50am	Scrubber Room, dual unit exhaust system
13	13.jpg	3/17/2023	09:51am	Scrubber Room, ceiling mounted pipe ventilation of the dual unit exhaust system
14	14.jpg	3/17/2023	09:51am	Scrubber Room, overview
15	15.jpg	3/17/2023	09:51am	Scrubber Room, overview
16	16.jpg	3/17/2023	09:52am	Scrubber Room, exhaust system control panel with calibration information
17	17.jpg	3/17/2023	09:52am	Scrubber Room, exhaust system piping and pumps
18	18.jpg	3/17/2023	09:52am	Scrubber Room, overview of exhaust system manufacturer label
19	19.jpg	3/17/2023	09:53am	Scrubber Room, exhaust system control panel with calibration information
20	20.jpg	3/17/2023	09:53am	Scrubber Room, air compressors for the exhaust system
21	21.jpg	3/17/2023	09:55am	Facility Exterior, ISOTainer receiving area
22	22.jpg	3/17/2023	09:55am	Facility Exterior, ISOTainer receiving area adjacent to the Willamette River
23	23.jpg	3/17/2023	09:55am	Facility Exterior, ISOTainer receiving area
24	24.jpg	3/17/2023	09:56am	Facility Exterior, ISOTainer receiving area
25	25.jpg	3/17/2023	09:58am	Facility Exterior, ISOTainer receiving area
26	26.jpg	3/17/2023	09:58am	Facility Exterior, nitrogen storage tank
27	27.jpg	3/17/2023	09:58am	Facility Exterior, nitrogen storage tank
28	28.jpg	3/17/2023	09:59am	Fire extinguisher overview near facility exterior exit.
29	29.jpg	3/17/2023	10:00am	Clean Lab Room, view of Flammable Room access door with fire extinguisher and hazcom signage
30	30.jpg	3/17/2023	10:00am	Flammables Room, chemical storage
31	31.jpg	3/17/2023	10:00am	Flammables Room, chemical storage
32	32.jpg	3/17/2023	10:00am	Flammables Room, chemical storage
33	33.jpg	3/17/2023	10:00am	Clean Room Lab, access door to Corrosives Storage Room with fire extinguisher, eyewash/shower, and hazcom signage
34	34.jpg	3/17/2023	10:01am	Corrosives Room, overview of chemical storage
35	35.jpg	3/17/2023	10:02am	Corrosives Room, overview of chemical storage
36	36.jpg	3/17/2023	10:03am	Corrosives Room, overview of chemical storage