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:

Name:	Columbia Valley Fruit, LLC
Physical Address:	1720 West Ahtanum Road, Union Gap, WA 98903
Phone Number:	(509) 452-9891
Latitude/Longitude:	46.557500, -120.504528
RMP Facility ID#	1000 0020 8045
FRS ID#:	110015520943
EJ Concerns:	Yes (Above 80%)

CONTACT INFORMATION (RMP Implementation):

Name:	Jon Hall
Phone Number:	(509) 452-9891
E-mail:	Jon@columbiavalleyfruit.com

EMERGENCY CONTACT INFORMATION:

Name:	Jon Hall
Phone (24-hr):	(509) 945-5878
E-mail:	Jon@columbiavalleyfruit.com
Website:	www.columbiavalleyfruit.com

TRIP DETAILS:

Inspection Date: August 15, 2023
Inspection Time: 0900 through 1335
EPA Inspection Team:

Peter Phillips, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Terry Garcia, US EPA Region 10 SEE Grantee, RMP Inspector
Edward Johannes, US EPA Region 10 SEE Grantee, RMP Inspector
Kenneth Valder, Weston Solutions, Inc., EPA START Contractor
Morgan Larimer, Weston Solutions, Inc., EPA START Contractor

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:
Initial Submission Date: June 22, 2009
Date of Latest Update: August 13, 2020

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)
1000109091	Refrigerated Warehousing and Storage	1000136293	49312	3	Ammonia, Anhydrous (7664-41-7)	17,226

PURPOSE:
The purpose of this inspection was to determine if this facility is in compliance with Section 112(r) of the Clean Air Act (CAA) 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:
- 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 ☐

EPCRA TIER II REPORTING:
Did the facility submit the 2022 Tier II report to the SERC? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: January 18, 2023

Did the facility submit a Tier II to the LEPC and local fire department? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: January 18, 2023

INSPECTION ENTRY:
The EPA Inspection Team (EPA), led by Peter Phillips, met with facility representatives at the Columbia Valley Fruit, LLC facility in Union Gap, WA. EPA arrived at the facility at 0900 and was joined by the following facility personnel:

Name	Title, Organization
Jon Hall	Receiving Manager, Columbia Valley Fruit LLC
Mark Lundberg	General Manager, Columbia Valley Fruit LLC
Jose Vaca	Operator, Columbia Valley Fruit LLC
Ken Russell	V.P. Engineering, Doubl-Kold

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

The facility is a first responder: No ☒ Yes ☐

If No, Responding Agency: Yakima Fire Department

Facility representatives escorted EPA to a conference room located in the facility's office building. Lead Inspector Peter Phillips, 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. Jon Hall 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 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.

The facility is unionized: No ☒ Yes ☐

An employee representative present during the facility visit: No ☒ Yes ☐

GENERAL INFORMATION:

The facility is regulated under RMP rule as a Program Level 3 facility that is owned and operated by Columbia Valley Fruit, LLC. The facility provides apple packing and shipping services for four independent growers and utilizes two anhydrous ammonia refrigeration systems to support product receiving, warehousing, and shipment. The refrigeration system is permitted for 17,226 pounds (lbs) of anhydrous ammonia and cools 29 Controlled Atmosphere (CA) rooms across two buildings and five common cold storage rooms. For the purposes of this inspection, only Machine Room 1 exceeds the RMP threshold quantity of 10,000 lbs for anhydrous ammonia. The facility employs 150 full-time employees on site, one of whom is the designated refrigeration system operator: Jose Vaca. Facility hours are 0600 to 1400 Monday through Friday. System maintenance and repair is provided by contractor Central Washington Refrigeration (CWR).

Anhydrous ammonia is utilized as a refrigerant that maintains the CA rooms at the facility. The refrigeration system consists of four ammonia compressors located in the machine room. Within the machine room are also recirculation vessels and a High-Pressure Receiver (HPR). Safety equipment in the engine room includes ammonia sensors and alarms, emergency ventilation via wall intake louvers and a ceiling exhaust fan, and an eyewash/shower station.

Since the most recent inspection in 2015, an additional anhydrous ammonia refrigeration system has been added to the facility to support a new 23,500 square foot CA room and five open common storage rooms. Additionally, Machine Room 2 in Building A was decommissioned, with the ammonia pipes capped and underground pipes removed.

ON-SITE OBSERVATIONS:
EPA toured the facility from approximately 0935 to 1030, escorted by facility representatives Hall, Vaca, and Lundberg, and contractor representative Russell (Doubl-Kold). The EPA inspection team took photos of the regulated refrigeration system and associated common storage room. photos taken during the inspection are included in Attachment A to this report and are referenced below.

The tour began in Machine Room 1 where EPA observed an emergency shower/eyewash station, emergency equipment shutdown and ventilation system controls, and hazardous communication (hazcom) signage posted on the access door to Machine Room 1 (photo 1). EPA observed the Master Power Shutoff (photo 2) and four screw refrigeration compressors (photos 3-4). The suction accumulator and high pressure receiver (HPR) are located on the northern wall of the machine room (photo 5). EPA reviewed safety relief valve (SRV) installation tags associated with each of the compressor units (photo 6). While there are two ammonia detection sensors within the Machine Room (photo 7), there are no strobes or audible alarms. EPA noted that the exit door was not clearly labeled from the inside and did not have panic hardware (photo 8). The inspection team also viewed the associated Control Room (photo 9).

Columbia Valley Fruit representatives led the EPA into the cold storage rooms. EPA observed an ammonia piping bridge leading from Machine Room 1 into CA Room 17 (photo 10). The team randomly selected CA Room 17 and Cold Storage Room 15-2 to conduct an entry and view the evaporator banks in the ceiling penthouses. CA Room 17 had two evaporator banks (photo 11), while Room 15-2 had six banks (photo 12). Emergency ammonia detectors were observed in Room 15-2 (photo 13) that activate an auto-dial alarm at 20 parts per million (ppm) of ammonia and initiates shutdown at 100 ppm ammonia.

The tour proceeded to the Building E Mezzanine, where the team inspected ammonia transfer lines (photo 14), Surge Drum (photo 15), and viewed ammonia leak detectors (photo 16). From there, EPA continued to the decommissioned Machine Room 2 in Building A where inspectors verified that pipes were capped off (photo 17).

EPA viewed the Machine Room in Building F, which contains 4,470 lbs of anhydrous ammonia. The access door included hazcom signage was well labeled with an emergency shower/eyewash station in close proximity (photo 18); however, the door lacked panic hardware (photo 19). Inside the machine room are two screw compressors, with the suction accumulator and HPR on the western wall behind (photo 20).

After touring the RMP-covered process areas at the facility, EPA returned to the conference room at 1030 to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to Hall, Lundberg, Vaca, and Russell. The exit briefing was conducted at 1320, and the EPA inspection team exited the facility at 1345.

INFORMATION COLLECTED FROM FACILITY:

1. Inspection Sign-In Sheet
2. Items to be resolved based on Doubl-Kold 5 yr. MI Inspection
3. Compliance Audit June 29, 2020 Recommendation Table

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

1) **Process Hazard Analysis [68.67]:** The owner or operator has not assured that recommendations are resolved in a timely manner and documented [68.67(e)].

2) **Mechanical Integrity [68.73]:** The owner or operator has not corrected deficiencies in equipment that were outside acceptable limits defined by the process safety information before further use or in a safe and timely manner, when necessary, means were taken to assure safe operation [68.73(e)].
3) **Compliance Audits [68.79]:** The owner or operator has not certified that the stationary source has evaluated compliance with the provisions of the prevention program at least every three years to verify that the developed procedures and practices are adequate and being followed [68.79(a)].
4) **Emergency Response [68.90 – 68.96]:**
   a) The owner or operator has not performed annual emergency response coordination activities [68.90(b)(4)].
   b) The owner or operator has not coordinated response needs with local emergency planning and response organizations to determine how the stationary source is addressed in the community emergency response plan and ensured that local response organizations are aware of the regulated substances at the stationary source [68.93(a)].
5) **Risk Management Plan [40 CFR 68.150 - 68.195]:** The owner or operator does not provide a phone number and email address of local emergency planning and response organizations [68.180(a)(1)].

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.

1. Provide information on resolution of Compliance Audit June 29, 2020 Ref. No. 13: "The relief valves associated with CA1 should be re-directed up. Presently the discharge would be directly into a person's face, if standing there." The facility provided documentation via email on 8/15/2023 that this has been mitigated by Central Washington Refrigeration.

INSPECTION 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:

PETER PHILLIPS (Affiliate)
Digitally signed by PETER PHILLIPS (Affiliate)
Date: 2023.11.02 12:47:07 -07'00'

Inspector Signature

JAVIER MORALES
Digitally signed by JAVIER MORALES
Date: 2023.11.02 13:57:04 -07'00'

RMP Coordinator/Approval

ERIN WILLIAMS
Digitally signed by ERIN WILLIAMS
Date: 2023.11.06 15:01:30 -08'00'

EPCRA Coordinator/Approval

MATTHEW QUARTERMAN
Digitally signed by MATTHEW QUARTERMAN
Date: 2023.11.09 12:36:53 -08'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: Columbia Valley Fruit
City, State: Union Gap, WA
Photographer: Morgan Larimer

File	Photo Layout ID	Date	Time	Description
Photo1.jpg	1	8/15/2023	9:35 AM - 10:30 AM	Facility Interior; Access door to Machine Room 1, shower/eyewash station, and emergency shutoff
Photo2.jpg	2	8/15/2023	9:35 AM - 10:30 AM	Machine Room 1; Master Power Shutoff for Machine Room 1 and floor labelling
Photo3.jpg	3	8/15/2023	9:35 AM - 10:30 AM	Machine Room 1; Overview of Compressors 1 through 3
Photo4.jpg	4	8/15/2023	9:35 AM - 10:30 AM	Machine Room 1; Compressor 4
Photo5.jpg	5	8/15/2023	9:35 AM - 10:30 AM	Machine Room 1; Suction Accumulator, High-Pressure Receiver, and King Valve on northern wall of Machine Room 1
Photo6.jpg	6	8/15/2023	9:35 AM - 10:30 AM	Machine Room 1; Compressor 1 pressure relief valve installation tags
Photo7.jpg	7	8/15/2023	9:35 AM - 10:30 AM	Machine Room 1; Ammonia detection sensors and electric panels
Photo8.jpg	8	8/15/2023	9:35 AM - 10:30 AM	Machine Room 1; Exit door by rollup bay door
Photo9.jpg	9	8/15/2023	9:35 AM - 10:30 AM	Machine Room 1; Machine Room 1 Control Room
Photo10.jpg	10	8/15/2023	9:35 AM - 10:30 AM	Facility Hallway; Ammonia piping bridge between Machine Room 1 in Building D and Controlled Atmosphere (CA) Room 17 and cold storage rooms in Building E
Photo11.jpg	11	8/15/2023	9:35 AM - 10:30 AM	CA Room 17; Evaporator banks
Photo12.jpg	12	8/15/2023	9:35 AM - 10:30 AM	CA Room 15-2; Evaporator banks
Photo13.jpg	13	8/15/2023	9:35 AM - 10:30 AM	CA Room 15-2; Ammonia sensor in center of Condenser Bank A
Photo14.jpg	14	8/15/2023	9:35 AM - 10:30 AM	Building E Mezzanine; ammonia transfer lines
Photo15.jpg	15	8/15/2023	9:35 AM - 10:30 AM	Building E Mezzanine; Surge Drum 27
Photo16.jpg	16	8/15/2023	9:35 AM - 10:30 AM	Building E Mezzanine; Ammonia leak detectors in Mezzanine
Photo17.jpg	17	8/15/2023	9:35 AM - 10:30 AM	Building E Mezzanine; Capped ammonia piping in decommissioned Machine Room 2
Photo18.jpg	18	8/15/2023	9:35 AM - 10:30 AM	Building F Machine Room; Access door to Building F Machine Room, shower/eyewash station, and emergency shutoff
Photo19.jpg	19	8/15/2023	9:35 AM - 10:30 AM	Building F Machine Room; Exit door
Photo20.jpg	20	8/15/2023	9:35 AM - 10:30 AM	Building F Machine Room; Building F Machine Room Compressors 1 (right) and 2 (left) with Suction Accumulator tank and Central Washington Refrigeration (CWR) pressure gauges in background