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

FACILITY INFORMATION:
Name: Washington Fruit & Produce Company - Moxee
Physical Address: 1221 Walters Road, Moxee, WA1221
Phone Number: (509) 945-3028
Latitude/Longitude: 46.546861/-120.34758346.54
EPA Facility ID# 1000 0016 0434

CONTACT INFORMATION (RMP Implementation):
Name: Tommy Hanses, Warehouse Manager (updated 7/21/21)
Phone Number: (509) 945-3028
E-mail: none provided.

EMERGENCY CONTACT INFORMATION:
Name: Kevin Heffington, Chief Engineer (updated 7/21/21)
Phone (24-hr): (509) 930-1876
E-mail: Kheffington@washfruit.com
Website: www.washfruit.com

AUDIT DETAILS:
Contact Date: March 26, 2021
Inspectors: Terry Garcia, US EPA Region 10 SEE Lead RMP Inspector

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:
Initial Submission Date: August 24, 1999
Date of Latest Update: July 21, 2021

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)
1000117734	Refrigeration System	1000147205	115114	3	Ammonia, Anhydrous (7664-41-7)	47,000

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? Updated 7/21/21 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 ☐

EPCRA TIER II REPORTING:
Did the facility submit their 20202020 Tier II report to the SERC? No ☐ Yes ☒
If Yes, Date the Tier II was submitted: February 11, 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: Mr. Tillett stated he hand delivered the Tier II to both fire department and LEPC, on 2/22/2021, but fire department was closed at the time of delivery.

GENERAL INFORMATION:
The facility is regulated under the Risk Management Program as a Program Level 3 process and is owned and operated by Washington Fruit & Produce Company (Washington Fruit)Washington Fruit & Produce Company (Washington Fruit). Washington Fruit is a fruit storage and distribution facility. Access to their facility is restricted to authorized employees, management personnel, and contractors. Washington Fruit reported in their 2016 RMP a maximum intended inventory of 47,000 pounds of anhydrous ammonia exceeding the threshold quantity of 10,000 pounds of anhydrous ammonia exceeding the threshold quantity of 10,000 pounds. There are two full-time employees on site.

INFORMATION REQUESTED FROM FACILITY:

1. Process Hazard Analysis Process Hazard Analysis – last two updates/revalidations.
2. Compliance Audit –Compliance Audit – last two compliance audit reports.
3. Training – operator/maintenance initial and refresher training records.

ANALYSIS OF DOUCMENTATION SUBMITTED:

1. **Process Hazard Analysis (PHA):** Washington Fruit provided their 2011, 2016, and 2021 PHA for the Main Plant, Moxee and Union Gap facilities. The 2016 and 2021 PHA revalidations used the What If/Checklist methodology. The 2016 and 2021 PHA teams were identified as Washington Fruit employees who are knowledgeable of the ammonia refrigeration system. The 2016 PHA for Moxee and Union Gap plants appear to be identical. Also, Mr. Tillett's name was listed on the 2016 PHA documents submitted and later revealed that he was not working at the facility in 2016. A corrected document was submitted entitled Moxee PHA 2016 correction. This document differed from the previous 2016 PHA document in that two names (Mr. Tillett as team member and Mr. Fabian as Lead Team) were removed. There were no revision notations on the Moxee PHA 2016 'correction' version submitted on August 19, 2021 and another submitted on August 24, 2021 without revision notes.

2. **<u>Compliance Audits</u>:** Washington Fruit provided their January 26, 2018 and January 6, 2021 Compliance Audit reports. The 2018 audit was conducted by Washington Fruit employees including operators and the audit report was signed certified on April 29, 2018. The 2018 audit identified seventy-four (74) findings with 73 closed action items and one open action item. The open 2018 audit finding stated the piping and instrumentation diagrams (P&ID) required updating.

   The 2021 audit was conducted by Washington Fruit employees including operators and the audit report was certified on January 6, 2021. The 2021 audit identified 89 findings with 85 closed and 4 open or in progress. Open 2021 audit finding Item #D is a carryover from the 2018 audit to update their P&IDs that will be completed by end of August 2021.

3. **<u>Training</u>:** Washington Fruit provided training documents for their four operators, Austin (Matthew) Cleem, Shane Tillett, Kevin Heffington and Daniel Ramirez (newer employee). The initial training documentation included Ammonia Safety and Hazmat Awareness certifications, RETA IR-1 & Industrial Ammonia Refrigeration Operator I Training certifications, RETA IR-2 & Industrial Ammonia Refrigeration Operator II Training certifications, and PSM/RMP Training certifications for their operators. The operator initial training documents did not include site specific training such as operating procedures, emergency shutdown/operations, and safe work practices indicating that operators had knowledge of ammonia refrigeration process and equipment.

   The 2018 and 2021 compliance audits stated that every three years their operators have refresher training on operating procedures. Washington Fruit provided their annual standard operating procedure (SOP) review training documentation for their operators dated in 2020 and 2021. The signed annual SOP training certification states that the operator has reviewed and understood each plants SOP and equipment. Washington Fruit was unable to provide documentation of the 2019 SOP training for their operators that was done. Washington Fruit stated that they provide informal training but is not documented such as refresher training. Washington Fruit has their facility engineer do a walk around with their new employees of the ammonia refrigeration system and show them what needs to be done but is not documented for initial hands on training.

   Washington Fruit stated that their four operators conduct some maintenance on process equipment. Washington Fruit also uses a contractor, Central Washington Refrigeration Company to service their ammonia refrigeration process equipment.

<u>AREAS OF CONCERNS</u>:

1. <u>Training</u>: Washington Fruit was unable to provide initial training documents for their operators that includes site specific training such as operating procedures, emergency shutdown/operations, and safe work practices indicating that operators had knowledge of ammonia refrigeration process and equipment as required. Washington Fruit stated that for new employees they show them around the plant and tell them what needs to be done but does not document this action.

2. <u>Training</u>: Washington Fruit was unable to provide their annual standard operating procedure (SOP) review training documentation for their operators prior to 2020. In addition, Washington Fruit was unable to provide training documentation for hands on training for their operators on operating procedures.

3. Compliance Audit: An open 2018 Compliance Audit finding, Item #D was carried over to the 2021 audit as an unresolved finding. This 2021 audit finding Item #D is scheduled to be completed by end of August 2021.

4. RMP Correction: Washington Fruit emergency contact information was not current and over three years late in correcting. The previous emergency contact, Dave Toler, left the company on July 31, 2017. Washington Fruit re-submitted their RMP on July 21, 2021 with Mr. Kevin Heffington as the new emergency contact person.

5. Process Hazard Analysis (PHA): Washington Fruit's 2016 and 2021 PHA revalidation does not have a system to properly track the completion of findings and recommendations.

6. Process Hazard Analysis (PHA): The 2011 PHA revalidation prepared by Ammonia PSM shows that this report addresses their three plants, Main (Yakima), Moxee and Union Gap. In general, a PHA is done to identify site specific hazards for a covered process at a facility according to the RMP General Guidance. In addition, this PHA revalidation did not track the completion of eleven findings and recommendations for each site and the report was not signed by the PHA team members and management.

DOCUMENTS REQUESTED ON FOLLOW-UP:
The following documents were requested after the initial submission of documents. These documents were reviewed to determine compliance with Section 112(r) of the Clean Air Act.

1. The 2018 Compliance Audit tracking sheet on action items.
2. The 2021 PHA tracking sheet on action items.
3. Completed Training Summary Form for all operators and maintenance training including the name of contractors who perform maintenance on the refrigeration system.
4. The 2021 Compliance Audit Certification signature page.
5. Annual SOP certification and documentation for Moxee plant operators.
6. Tier II Report to the LEPC and local fire department.
7. Updated training summary for all of the operators including Daniel Ramirez with corrected dates.
8. Corrected SOP sign off for Daniel Ramirez for years 2020 and 2021.
9. Name of the trainer and documentation that shows the Trainer is verifying operator training.
10. SOP training sign off for all operators for past three years, 2019-2021 as applicable or if available.
11. Date of all P&ID's that will be completed and uploaded, as confirmed by Contractor.
12. A Recommendation Summary list/PHA tracking for both 2016 and 2021. Correct document listing Shane Tillett as team member since Mr. Tillett stated he was not at the site in 2016.
13. A second requested/corrected PHA for the 2016 revalidation that denotes the changes made and the revisions for document control.
14. Three separate email (4/1/21, 8/19/21 and 8/24/21) submittals for the 2016 PHA were provided and corrections of 2016 PHA provided (twice) but did not include revision dates to reflect the changes that were made.

AUDIT REPORT CERTIFICATION:
This is to certify that I, Terry Garcia was the lead inspector at this facility and that I have verified the accuracy of the observations in this inspection report:

Terry Garcia Digitally signed by Terry Garcia
Date: 2021.09.13 08:23:47 -07'00'

Signature Date

JAVIER MORALES Digitally signed by JAVIER MORALES
Date: 2021.09.13 09:49:23 -07'00'

RMP Coordinator/Approval Date

ERIN WILLIAMS Digitally signed by ERIN WILLIAMS
Date: 2021.09.17 16:14:10 -07'00'

EPCRA Coordinator/Approval Date

Jennifer A Sullivan Digitally signed by Jennifer A Sullivan
Date: 2021.09.17 16:21:56 -07'00'

Land Enforcement Section Chief/Approval Date