



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: Washington Fruit and Produce Company - Union Gap
Physical Address: 2116 N Rudkin Road, Union Gap, WA 98903
Phone Number: 509-480-0820
Latitude/Longitude: 46.571444 / -120.474722
RMP Facility ID#: 100000106244
FRS ID#: 110000553909
EJ Concerns: Yes (Above 80%)

CONTACT INFORMATION (RMP Implementation):

Name: Shane Tillett
Phone Number: 509-480-0820
E-mail: stillett@washfruit.com

EMERGENCY CONTACT INFORMATION:

Name: Kevin Heffington
Phone (24-hr): 509-930-1876
E-mail: kheffington@washfruit.com

TRIP DETAILS:

Inspection Date: 4/29/2022
Inspection Time: 0900 hours through 1015 hours (facility 1 of 2)
Inspectors: Peter Phillips, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Edward Johannes, US EPA Region 10 SEE Grantee, EPCRA Inspector
Bob Hales, US EPA Region 10 SEE Grantee, RMP Inspector
Lisa Graves, Weston Solutions, Inc., EPA START Contractor

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: June 21, 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)
1000117735	Refrigeration System	1000147206	115114	3	Ammonia, Anhydrous (7664-41-7)	17,000

PURPOSE:

The purpose of this inspection 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.

- The facility has been previously inspected in the past 5 years: 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 the 2022 Tier II report to the SERC? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 2/17/2022

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

If Yes, Date the Tier II was submitted: 2/17/2022 to LEPC and 2/24/2022 to Yakima Fire Department

INSPECTION ENTRY:

Peter Phillips led the inspection entry. The inspection team met with Shane Tillett at the Washington Fruit and Produce Company Union Gap facility in Union Gap, Washington. The team arrived at the facility at 0900 hours and was joined by the following facility personnel:

Name	Title
Shane Tillett	PSM Coordinator
Rob Wickersham	Engineering/PSM with CWR Central
Meredith Denny	Compliance Specialist with APSM

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

Shane Tillett previously notified the inspection team that the Union Gap Facility had no conference room to convene in. Therefore, following the facility tour the inspection team would be escorted back to the Yakima Facility office to complete the document review portion of the inspection. Upon arrival to the facility, reintroductions were conducted with the inspectors, along with the purpose of their visit.

EPA requested an explanation of the facility's operations and any additional safety measures that should be taken during the site tour. Shane Tillett 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 Washington Fruit and Produce Company Union Gap Facility (the facility) is regulated under the Risk Management Program as a Program Level 3 facility and is owned and operated by the Washington Fruit and Produce Company. The facility is a produce storage and distribution center which utilizes an ammonia refrigeration system. One engine room houses the main components of the refrigeration system, which supports fifty-three controlled atmosphere rooms at the facility. There are no full-time employees on site, and four refrigeration operators from the Washington Fruit and Produce Yakima Facility rotate to provide oversight of refrigeration operations at the Union Gap Facility.

The facility stores apples and cherries in refrigerated storerooms while the produce awaits shipment. Refrigeration operators check the ammonia refrigeration system each operating workday, and all refrigerated areas are continuously monitored by an ammonia leak detection system. A computer system remotely notifies the refrigeration operators when an alarm is triggered, or when refrigeration parameters are out-of-range. There are no process modifications that impact the facility's refrigeration system. The facility has established an Emergency Action Plan (EAP) in the event of an ammonia release.

ON-SITE OBSERVATIONS:

The facility tour was conducted from approximately 0900 hours to 0930 hours. The EPA Inspection Team was escorted by facility representatives Shane Tillett and Rob Wickersham. The EPA inspection team observed the facility engine room (Engine Room), Warehouse Areas 86 and 93 which house-controlled atmosphere rooms CA 29 and CA 37, and ammonia piping throughout the facility.

The Engine Room at the facility houses the main equipment for the refrigeration system (Photos 1-8), which includes compressors, valves, intake vents, exhaust fans, high pressure vessel tanks, the ammonia sensor network panel, and an ammonia leak detection device.

There are two controlled atmosphere rooms, designated as CA 29 in Warehouse Area 86 (Photos 10-13) and CA 37 in Warehouse Area 93 (Photos 14-15 and 17-18). The primary equipment observed in the controlled atmosphere rooms were the evaporators and ammonia sensor tubing intakes. Ammonia piping to the refrigeration system is located inside Warehouse Area 93 (Photo 16).

Ammonia refrigeration equipment as clearly labeled and tagged, with appropriate safety features in place. Photographs of the facility, refrigeration system components, and pertinent safety measures are included in Attachment A to this report.

After touring the RMP-covered process areas at the facility, the inspection team returned to the Yakima facility to review RMP documentation in a conference room. Upon completion of the document review, the EPA inspection team provided a debriefing to Shane Tillett, Rob Wickersham, and Meredith Denny.

INFORMATION COLLECTED FROM FACILITY:

No documents were collected during the inspection.

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

1. **Mechanical Integrity [68.73(c)]:** Washington Fruit Union Gap did not train each employee involved in maintaining the on-going integrity of process equipment. The facility could not provide documentation for employees involved in maintaining the ongoing integrity of process equipment.

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.

No follow-up documentation was requested.

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:

Phillips, Peter E. Digitally signed by Phillips, Peter E.
Date: 2022.07.26 13:15:45 -07'00'

Inspector Signature

JAVIER MORALES Digitally signed by JAVIER MORALES
Date: 2022.07.26 13:52:47 -07'00'

RMP Coordinator/Approval

ERIN WILLIAMS Digitally signed by ERIN WILLIAMS
Date: 2022.07.27 13:55:20 -07'00'

EPCRA Coordinator/Approval

Jennifer A Sullivan Digitally signed by Jennifer A Sullivan
Date: 2022.07.27 15:34:05 -07'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: Washington Fruit and Produce Company Union Gap

City, State: Union Gap, Washington

Photographer: Lisa Graves

File	Photo Layout ID	Date	Time	Description
DSCN2438	1	4/29/2022	9:01 AM	Engine Room - Entry/Exit
DSCN2439		4/29/2022	9:03 AM	Engine Room - King Valve
DSCN2440	3	4/29/2022	9:03 AM	Engine Room - King Valve
DSCN2441	8	4/29/2022	9:04 AM	Engine Room - Ammonia Leak Detector
DSCN2442	7	4/29/2022	9:05 AM	Engine Room - Ammonia Sensor Network Panel
DSCN2443	6	4/29/2022	9:07 AM	Engine Room - Exhaust
DSCN2444	5	4/29/2022	9:07 AM	Engine Room - Intake
DSCN2445	2	4/29/2022	9:07 AM	Engine Room - High Pressure Receiver
DSCN2446	4	4/29/2022	9:07 AM	Engine Room - Compressors
DSCN2447		4/29/2022	9:09 AM	Facility - External Piping and Ducts
DSCN2448	10	4/29/2022	9:11 AM	Warehouse 86 - Entry/Exit
DSCN2449	11	4/29/2022	9:12 AM	CA 29 - Entry/Exit
DSCN2450	12	4/29/2022	9:13 AM	CA 29 - Condenser
DSCN2451	13	4/29/2022	9:13 AM	CA 29 - Ammonia Sensor Tube
DSCN2452		4/29/2022	9:13 AM	Warehouse 93 - Corridor
DSCN2453	14	4/29/2022	9:17 AM	Warehouse 93 - Entry/Exit
DSCN2454	16	4/29/2022	9:18 AM	Warehouse 93 Refrigeration System Piping
DSCN2455	17	4/29/2022	9:19 AM	CA 37 - Entry/Exit
DSCN2456	18	4/29/2022	9:19 AM	CA 37 - Condenser and Ammonia Sensor Tube
DSCN2457	15	4/29/2022	9:20 AM	Warehouse 93 - Corridor
DSCN2458	9	4/29/2022	9:21 AM	Facility - External Piping and Ducts