U.S. ENVIRONMENTAL PROTECTION AGENCY

Risk Management Program Inspection Findings and Alleged Violations Summary
Region 10

REASON FOR INSPECTION: This inspection is for the purpose of determining compliance with Section 112(r)(7) accidental release prevention requirements of the Clean Air Act, as amended 1990. The scope of this inspection may include, but is not limited to: reviewing and obtaining copies of documents and records; interviews and taking of statements; reviewing of chemical storage, handling, processing, and use; taking samples and photographs; and any other inspection activities necessary to determine compliance with the Act.

FACILITY NAME: American Freeze Dry	☒ PRIVATE # EMPLOYEES 30	☐ GOVERNMENTAL/MUNICIPAL POPULATION SERVED:
FACILITY LOCATION: 6025 Portal Way, Ferndale, Washington 98248	INSPECTION START DATE: 2/10/2021	INSPECTION START TIME: N/A
MAILING ADDRESS: 6025 Portal Way, Ferndale, Washington 98248	INSPECTION END DATE: 2/10/2021	INSPECTION END TIME: N/A
RESPONSIBLE OFFICIAL, TITLE, PHONE NUMBER: Tony Cullum, Project Leader, (360) 961-2471	EPA FACILITY ID# 1000 0023 1714	
FACILITY REPRESENTATIVE(S), TITLE(S), PHONE NUMBER(S):	INSPECTOR NAME(S), TITLE(S), PHONE NUMBER(S) Javier Morales	
	INSPECTOR SIGNATURE JAVIER MORALES	DATE Digitally signed by JAVIER MORALES Date: 2021.03.05 13:43:17 -08'00'

INSPECTION FINDINGS

IS FACILITY SUBJECT TO RMP REGULATION (40 CFR 68)? ☒ YES ☐ NO

DID FACILITY SUBMIT AN RMP AS PROVIDED IN 68.150 TO 68.185? ☒ YES ☐ NO

DATE RMP FILED WITH EPA: 1/24/2016: DATE OF LATEST RMP UPDATE: 1/24/2016

1) PROCESS/NAICS CODE: 311411 PROGRAM LEVEL: ☐ 1 ☐ 2 ☒ 3

REGULATED SUBSTANCE: Anhydrous Ammonia MAX. QUANTITY IN PROCESS (lbs.): 11,800

DESCRIPTION OF ALLEGED VIOLATIONS

CAA Section 112(r) and its implementing regulations in 40 C.F.R. Part 68 require an owner or operator of a stationary source that has more than a threshold quantity of a regulated substance (listed in § 68.130) in a process, to develop a Risk Management Plan (RMP) and Risk Management Program.

The owner or operator must review and update the RMP as specified in 40 C.F.R. § 68.190(b) as required by § 68.190(a). American Freeze Dry failed to submit an updated RMP to EPA at least once every five years as required by § 68.190(a) and (b)(1). The first submission of the RMP that EPA has on file is dated 1/24/2016. The latest RMP submission that EPA has on file is dated 1/24/2016. The five-year update was due 1/24/2021.

DID FACILITY CORRECTLY ASSIGN PROGRAM LEVELS TO PROCESSES? ☒ YES ☐ NO

ATTACHED CHECKLIST(S):

☐ PROGRAM LEVEL 1 ☐ PROGRAM LEVEL 2 ☒ PROGRAM LEVEL 3