



# 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: Bellingham Cold Storage Co. - Orchard Facility	<input checked="" type="checkbox"/> PRIVATE # EMPLOYEES: 55	<input type="checkbox"/> GOVERNMENTAL/MUNICIPAL POPULATION SERVED: N/A
FACILITY LOCATION: 600 Orchard Dr., Bellingham, WA 98225	INSPECTION START DATE: N/A	INSPECTION START TIME: N/A
MAILING ADDRESS: P.O. Box 895, Bellingham, WA 98227	INSPECTION END DATE: N/A	INSPECTION END TIME: N/A
RESPONSIBLE OFFICIAL, TITLE, PHONE NUMBER: Douglas Thomas, President 360-733-1640	EPA FACILITY ID# 100000141973	
FACILITY REPRESENTATIVE(S), TITLE(S), PHONE NUMBER(S):	INSPECTOR NAME(S), TITLE(S), PHONE NUMBER(S) Javier Morales, RMP Coordinator, 206-553-1255	
	INSPECTOR SIGNATURE	DATE

### 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: 6/24/1999

DATE OF LATEST RMP UPDATE: 12/14/2018

1) PROCESS/NAICS CODE: 49312

PROGRAM LEVEL:  1  2  3

REGULATED SUBSTANCE: Anhydrous Ammonia

MAX. QUANTITY IN PROCESS (lbs.): 30,378

### 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). Bellingham Cold Storage Company 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 6/24/1999. The latest RMP submission that EPA has on file is dated 12/14/2018. The five-year update was due 12/14/2023.

DID FACILITY CORRECTLY ASSIGN PROGRAM LEVELS TO PROCESSES?  YES  NO

ATTACHED CHECKLIST(S):

PROGRAM LEVEL 1

PROGRAM LEVEL 2

PROGRAM LEVEL 3