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30288

INSPECTION

Prepared by: Matthew Pitman

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Deliver to Room 1400

Revised July 2002

OFFICE OF ENVIRONMENTAL COMPLIANCE
SURVEILLANCE DIVISION

TO: Lourdes Iturralde, Enforcement Manager
FROM: Jeffrey P. Meyers, Manager 
SUBJECT: Surveillance Division Referral to Enforcement Division

AI Number: 30288

Media: Accident Prevention/RMP

Facility (Include company name, mailing address, and responsible official):

New Orleans Cold Storage- Airline

124 Airline Highway

Metairie, LA, 70001

Attn: Mr. Rafael Lopez, Plant Manager

Area(s) of Concern (include a brief description):

1. The employees and their representatives were not provided access to the PHA and the documents used to develop the PHA. Reference LAC 33:III.5901.A as described by 40 CFR 68.83 (c).
2. The facility failed to provide initial and refresher training for employees. The facility had not documented that employees working at the facility prior to implementation of the chemical accident prevention program implementation were properly trained and qualified to perform their duties. The facility had not prepared a record identifying the employee, the date of training, and the means used to verify the employee understood the training. Reference LAC 33:III.5901. A as described by 40 CFR 68.71.
3. Hot work permits are not being issued when hot work is conducted. Reference LAC 33:III.5901. A as described by 40 CFR 68.85(a).
4. A system was not established to track the resolution of the recommendations found in the May 1994 RMP Manual. Reference LAC 33:III.5901. A as described by 40 CFR 68.67(e).
5. The PHA has not been updated and revalidated by a team since May 1994. Reference LAC 33:III.5901. A as described by 40 CFR 68.67(f).
6. The resolution of each recommendation contained in the May 1994 PHA was not documented or retained. Reference LAC 33:III.5901.A as described in 40 CFR 68.67(g).

New Orleans Cold Storage
AI Number 30288
Enforcement Referral

Area(s) of Concern (cont.) *(include a brief description):*

7. The facility could not locate materials of construction for process equipment. Reference LAC 33:III.5901.A as described in 40 CFR 68.65(d)(1)(i).
8. Procedures did not contain properties and hazards of chemicals in the process, precautions necessary to prevent exposure, or control measures to be taken if exposure occurs. Reference LAC 33:III.5901.A as described in 40 CFR 68.69(a)(3)(i), (ii), & (iii).
9. The facility failed to annually certify operating procedures.. Reference LAC 33:III.5901.A as described in 40 CFR 68.69(c).
10. The facility failed to establish and implement written procedures to maintain the ongoing integrity of process equipment.. Reference LAC 33:III.5901.A as described in 40 CFR 68.73(b).
11. The facility failed to perform inspections and tests on process equipment. Reference LAC 33:III.5901.A as described in 40 CFR 68.73(d)(1).
12. The facility failed to document each test performed on process equipment. Reference LAC 33:III.5901.A as described in 40 CFR 68.73(d)(4).

Investigator: Kevin P. Sweeney - 3-2567
Reviewed (ES Supervisor / Date): N/A *gpn* / 1-2-27-01
Reviewed (ES Staff / Date): N/A
Date Referred to Enforcement: _____

AUDIT REPORT

Date(s) of Stationary Source Audit: December 12, 2001		Areas of Concern Noted: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Report Date: December 13, 2001		Log #: AP01-0049	
I. Stationary Source Identification			
Name: New Orleans Cold Storage – Airline Facility.		AI #: 30288	
Street Address: 124 Airline Highway			
City: Metairie		Parish: Jefferson	
State: LA		Zip: 70001	
Name, address of corporate parent company (if applicable):			
Owner/operator: New Orleans Cold Storage		Phone: (504) 837-9150	
Mailing Address: 124 Airline Highway			
City: Metairie		State: LA	Zip: 70001
Name, title, and phone of person responsible for 40 CFR Part 68 implementation: Jimmy Bienvenu, Engineer			Phone: (504) 837-9150
Name and title of emergency contact: Ralph Lopez		Day Phone: (504) 837-9150	24-hour Phone: (504) 780-7218
Stationary source personnel involved in audit (accompanied site tours, provided documents and explanations, etc.)	Name	Title	Phone #
	Jimmy Bienvenu	Engineer	(504) 837-9150
Lead Auditor: Kevin Sweeney			
Auditors Raymond Boutte and Darlene Doshier-Collard			
Specific processes audited	Process ID# or Name	Program Level	Audit Elements
	Ammonia Refrigeration	3	all

PROGRAM 3 RMP AUDIT CHECKLIST

RMP REVIEW

LAC.5911.A&B. Is the facility's registration current and complete?

Yes No N/A

LAC.33.III.2. Have the annual Chemical Accident Prevention Program fees been paid?

Yes No N/A

68.1 & 68.12 Has the RMP been reviewed for Applicability (program level) and General Requirements?

Yes No N/A

68.155(a)-(g) Has the owner or operator included a brief description of the required elements in the executive summary of the RMP?

Yes No N/A

68.165(a)&(b) Does the submitted RMP contain one or more toxic and or flammable worst-case scenario(s) that contain all of the required information accurately, and do the endpoint distances correlate with RMP Comp?

Yes No N/A

68.165(a)&(b) Does the submitted RMP contain one or more toxic and or flammable alternate-case scenario(s) that contains all of the required information accurately, and do the endpoint distances correlate with RMP Comp?

Yes No N/A

68.42&68.42(b) Does the submitted RMP contain all of the required five year accident history information?

Yes No N/A

HAZARD ASSESSMENT

Documentation [68.39]

68.39(a)-(e) Has the owner or operator maintained on site the required documentation for the hazard assessments?

Yes No N/A

III. Findings, Conclusions, and Recommendations*

Findings

Process safety information [68.65]

68.65(a) Has the owner or operator compiled written process safety information, which includes information pertaining to the hazards of the regulated substances used or produced by the process, information pertaining to the technology of the process, and information pertaining to the equipment in the process, before conducting any process hazard analysis required by the rule?

Yes No N/A

Area of Concern 40 CFR 68.65(d)(1)(i) The facility could not locate materials of construction for process equipment.

Process hazard analysis [68.67]

- 68.67(a) Has the owner or operator performed an initial process hazard analysis (PHA) meeting the requirements of this section, and has this analysis identified, evaluated, and controlled the hazards involved in the process?
 Yes No N/A

Area of Concern 40 CFR 68.67 (e) Did not have a system established to track the resolution of the recommendations found in the May 1994 RMP Manual

Area of Concern 40 CFR 68.67 (f) The PHA has not been updated and revalidated by a team since May 1994.

Area of Concern 40 CFR 68.67 (g) The resolution of recommendations from the May 1994 PHA were not tracked and there was no method available to determine if they had been completed.

Operating procedures [68.69]

- 68.69(a) Has the owner or operator developed and implemented written operating procedures that provide instructions or steps for conducting activities associated with each covered process consistent with the safety information as required by this section?
 Yes No N/A

Area of Concern 40 CFR 68.69(a)(i),(ii) and (iii) Procedures did not contain properties and hazards of chemicals in the process, precautions necessary to prevent exposure, or control measures to be taken if exposure occurs.

Area of Concern 40 CFR 68.69(c) Operating procedures had not been certified since being written in 1997.

Recommendation Combine daily operating checks and normal parameters into a "Normal Operating Procedure".

Recommendation Review operating procedures to ensure notes cautions, corrective measures cover critical potential deviations

Training [68.71]

- 68.71(a)(1) Has each employee presently involved in operating a process, and each employee before being involved in operating a newly assigned process, been initially trained in an overview of the process, the operating procedures as required by this section?
 Yes No N/A

Area of Concern 40 CFR 68.71 Unable to provide documentation of employee training, initial or refresher. Could not verify that on-the-job training (OJT) had occurred or the content of OJT.

Mechanical integrity [68.73]

68.73 Has the owner or operator established and implemented written procedures to maintain the on-going integrity of the process equipment as required by this section?
 Yes No N/A

Area of Concern 40 CFR 68.73(b) There were no written procedures for cutout switch or ammonia sensor testing.

68.73(c) Has the owner or operator trained each employee involved in maintaining the on-going integrity of process equipment?
 Yes No N/A

Has the owner or operator:

68.73(d)(1) Performed inspections and tests on process equipment?
 Yes No N/A

Pressure safety valves on the ammonia system not been tested since their original installation (approximately 1957)

Area of Concern 40 CFR 68.73d)(4) No documentation of ammonia sensor or annual level & pressure cutout testing

Management of change [68.75]

68.75 Has the owner or operator established and implemented written procedures to manage changes to process chemicals, technology, equipment, and procedures, and changes to stationary sources that affect a covered process as required by this section?
 Yes No N/A There have not been any changes at the facility since 1975.

Recommendation Review and update the Management of Change (MOC) process in the May 1994 RMP Manual to reflect actual process at the facility. Refer to 40 CFR 68.75 to ensure all requirements for MOC are addressed.

Pre-startup review [68.77]

68.77 Has the owner or operator performed a pre-startup safety review, as required by this section, for new stationary sources and for modified stationary sources when the modification was significant enough to require a change in the process safety information?
 Yes No N/A

Compliance audits [68.79]

- 68.79 Has the owner or operator certified, as required by this section, 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 are being followed?
- Yes No N/A Due in 2002

Incident investigation [68.81]

- 68.8 Has the owner or operator investigated, as required by this section, each incident that resulted in, or could reasonably have resulted in, a catastrophic release of a regulated substance?
- Yes No N/A There have not been no incidents at the facility. A process is outlined in the RMP Manual

Employee participation [68.83]

Has the owner or operator

- 68.83 Has the owner or operator developed a written plan of action regarding the implementation of the employee participation required by this section
- Yes No N/A

Area of Concern 40 CFR 68.83(c) Could not find documentation or confirm by interview of the person responsible for the RMP that employees, or their representatives, had access to the PHA and documents used to develop the PHA

Hot work permit [68.85]

- 68.85 Has the owner or operator issued a hot work permit for each hot work operation conducted on or near a covered process as required by this section?
- Yes No N/A

Area of Concern 68.85(a) Hot work permits are not being issued when hot work is conducted. No examples available of hot work permit and per interview, person responsible for RMP confirmed hot work permits not being issued.

Contractors [68.87]

Has the owner or operator:

- 68.87 Obtained and evaluated information regarding the contract owner or operator's safety performance and programs when selecting a contractor as required by this section?
- Yes No N/A Have not used a contractor in 10 years.

Emergency Response - Applicability [68.90]

68.90 Unless the facility is not required to comply, has the owner or operator of a stationary source developed an emergency response program as required by this section
 Yes No N/A

Emergency Response - Applicability [68.95]

68.95 Has the owner or operator developed and implemented an emergency response program for the purpose of protecting public health and the environment as required by this section?
 Yes No N/A

Management - [68.15]

Has the owner or operator:
68.15(a) Developed a management system to oversee the implementation of the risk management program elements as required by this section?
 Yes No N/A

Recommendation Review the management system to ensure compliance with 68.15.

Signatures: Lead Auditor: [Signature] 12/20/01
Auditors: Darlene Dasher-Collard

Approved by: [Signature] 12-27-01
Signature Date
EM
Title

*Findings, conclusions, and recommendations may be presented in one or several numerated attachments and referred to in the report.