

United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report

Americold – Nashville

Lebanon, Tennessee

February 1, 2024

1.0 Introduction

The U.S. Environmental Protection Agency's efforts to reduce the likelihood and severity of chemical accidents includes planning and legislative initiatives such as the National Contingency Plan, the Emergency Planning and Community Right-to-Know Act (EPCRA), and the Accidental Release Prevention requirements under Section 112(r) of the Clean Air Act (CAA), as amended in 1990. This report outlines an inspection of the Risk Management Program (RMP) as mandated by Section 112(r)(7) of the CAA.

The focus of this inspection was to assess the RMP for the ammonia refrigeration process at the Americold – Nashville facility located in Lebanon, Wilson County, Tennessee. This facility was selected for inspection because it had never been inspected under the RMP. The inspection, which was conducted on February 1, 2024, consisted of an examination of program documentation as well as site reviews of various aspects of facility operations. Personnel from the facility participated throughout the inspection. Requested program documents were provided for further review off-site. This report will provide a background of the facility and a listing of observations.

2.0 Background

The Americold – Nashville facility is located in Lebanon, Tennessee. The facility was built in 1991 and has been expanded over the years, the most recent expansion being in 2008. The facility was bought by Americold in 2020. The facility uses anhydrous ammonia for refrigeration purposes. The refrigeration process, consisting of piping, valves, and equipment, cycles ammonia through various physical states (high pressure liquid, low pressure liquid, low pressure vapor, high pressure vapor, then back to high pressure liquid) in order to provide refrigeration for cold food storage. The process is regulated as program level 3. According to facility records, the facility has a maximum of 18,400 pounds of anhydrous ammonia on site. The ammonia refrigeration process at the facility is subject to the RMP requirements of 40 C.F.R. Part 68 and EPCRA Section 302. The background specifics are summarized as follows in Table 1.

TABLE 1: Inspection Information Summary

Inspection Team

Lead Inspector: Jordan Noles, EPA

Inspector: Justin Stark, EPA

Inspector-in-Training: Callie Sotolongo, EPA
Date of Facility Visit: February 1, 2024

Facility Identification

Name: Americold – Nashville
Street Address: 918 Arctic Drive
City: Lebanon County: Wilson State: Tennessee Zip: 37090
EPA Facility ID No: 1000 0017 3572
Dun & Bradstreet (D&B) No: 58149378
Latitude: 36.184869
Longitude: -86.271400

Name, address and phone of corporate parent company:

Owner/Operator: AmeriCold Logistics, LLC
Mailing Address: 10 Glenlake Parkway, Suite 800
City: Atlanta State: Georgia Zip: 30328
Phone: (678) 441-1400

Name, title, and email of person responsible for 40 C.F.R. Part 68 implementation:

Name: Sheldon Baptiste
Title: SR. Regional PSM Manager
Phone: (615) 895-2790
Email: sheldon.baptiste@americold.com

Name and title of emergency contact:

Name: Khang Doan
Title: Facility Service Manager
Day phone: (615) 681-8385
24-hour Phone: (615) 681-8389
Email: khang.doan@americold.com

Name and titles of stationary source personnel involved in site inspection (*accompanied site tours, provided documents and explanations*):

Name: Derrick Taylor
Title: Engineering & Maintenance Manager
Phone: (931) 703-7559
Email: derrick.taylor@americold.com

Name: Seth Cross
Title: General Manager
Phone: (615) 336-9457
Email: seth.cross@americold.com

Name: Sheldon Baptiste
Title: Regional Health and Safety Manager

Phone: (404) 713-1561
Email: sheldon.baptiste@americold.com

Name: Ronny Cheek
Title: Process Safety Manager
Phone: (404) 502-6820
Email: ronny.cheek@americold.com

Note: This is not a union facility.

Date and Program Levels of Submitted Risk Management Plan

Date of initial submission: December 18, 2000 (as Nashville Refrigerated Services, Inc.)
Date of most recent submissions: January 26, 2024
Process: Ammonia Refrigeration
Process ID: 1000111709
Program Level as reported in RMP: 3
NAICS code: 49312 (Refrigerated Warehousing and Storage)

3.0 Observations

The inspection of the Americold – Nashville facility evaluated various sections of the RMP regulations (40 C.F.R. Part 68, Program Level 3) and the inspection checklist included in “Guidance for Conducting Risk Management Programs Inspections under Clean Air Act Section 112(r).” The inspection included an opening conference where EPA inspectors reviewed documents associated with the facility’s Risk Management Plan. The discussion was followed by a tour of the facility’s ammonia refrigeration process areas. An inspection out-brief was conducted where EPA inspectors requested additional documents for review off-site and described their observations. Observations from the RMP inspection at the Americold – Nashville facility are discussed below:

1. 40 C.F.R. § 68.65(d)(2) requires the owner or operator to document that equipment complies with recognized and generally accepted good engineering practices (RAGAGEP).
 - At the time of the inspection, the doors to the ammonia machinery room (AMR) were not tight-fitting.

The American National Standards Institute/International Institute of Ammonia Refrigeration (ANSI/IIAR) 2-2008 section 13.1.10.1 states, “*Each refrigerating machinery room shall have a tight-fitting door or doors opening outward, self-closing if they open into the building, and adequate in number to ensure freedom for persons to escape in an emergency.*”

- At the time of the inspection, there was only one door leading to the AMR that had an audible and visual alarm. The door leading from the interior of the facility did not have any type of alarm.

ANSI/IIAR 2-2008 section 13.2.1.2 states, *“The detectors shall activate visual and audible alarms inside the refrigerating machinery room and outside each entrance to the refrigerating machinery room.”*

- At the time of the inspection, maintenance equipment and combustible materials (e.g., ladders, equipment carts, cardboard boxes) were stored in the AMR.

ANSI/IIAR 2-2008 section 13.1.3.1 states, *“Flammable and combustible materials shall not be stored in machinery rooms.”*

Section 605.11 of the International Fire Code (IFC; 2018) states, *“Flammable and combustible materials shall not be stored in machinery rooms for refrigeration systems having a refrigerant circuit containing more than 220 pounds (100 kg) of Group A1 or 30 pounds (14 kg) of any other group refrigerant. Storage, use or handling of extra refrigerant or refrigerant oils shall be as required by Chapters 50, 53, 55 and 57.”*

Exception: This provision shall not apply to spare parts, tools and incidental materials necessary for the safe and proper operation and maintenance of the system.”

- At the time of the inspection, the emergency shutoff valve, or king valve was inaccessible.

ANSI/IIAR 2-2008 section 13.1.2.3 states, *“All manually operated valves inaccessible from floor level shall be operable from portable platforms, fixed platforms, ladders, or shall be chain-operated. Isolation valve(s) identified as being part of an emergency shutdown procedure shall be directly operable or chain-operated from a permanent work surface.”*

2. 40 C.F.R. § 68.67(e) requires the owner or operator to establish a system to promptly address the team’s findings and recommendations of the process hazard analysis (PHA); assure that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete actions as soon as possible; develop a written schedule of when these actions are to be completed; and communicate the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions.

- Facility representatives provided the inspection team with two past PHAs; one conducted in 2015 and one conducted in 2020. There were five action items with a

risk ranking level of “B” that were completed after their assigned due dates. Furthermore, there was no risk ranking matrix included in the submitted documents for the inspection team to verify the timetable to complete each recommendation based on the given risk ranking.

3. 40 C.F.R. § 68.73(d)(2) requires the inspection and testing procedures to follow RAGAGEP.

- At the time of the inspection, the inspection team noted ice under the insulation of some piping on the roof. Ice that forms underneath insulation could induce and accelerate corrosion.

ANSI/IIAR 6 Table 11.1 indicates a facility must visually inspect for damage or moisture incursion in insulation (i.e., dampness, condensation, frost, ice buildup) at least annually.

4. 40 C.F.R. § 68.79(d) requires the owner or operator to promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected.

- Facility representatives submitted two conducted compliance audits; one was conducted in 2020 and one conducted in 2023.
 - The compliance audit conducted in 2020 had six action items listed in the “Recommendations” section. Four of the action items were completed after the due date that the facility assigned them.
 - The compliance audit conducted in 2023 had 20 action items listed in the “Recommendations” section. Eleven action items were completed after the due date that the facility assigned them.

5. 40 C.F.R. § 68.81(b) requires an incident investigation to be initiated as promptly as possible, but not later than 48 hours following the incident.

- Facility representatives supplied the inspection team with an incident investigation report for an incident that occurred on 11/07/23. The report detailed an ammonia release and the corrective actions that were taken. The report indicated that the investigation began on 11/29/23, more than three weeks after the release occurred.

Inspection Report,

**JORDAN
NOLES**

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Jordan Noles, Inspector
North Air Enforcement Section
U.S. EPA Region 4

Approved by:

**JASON
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Jason Dressler, Section Chief
North Air Enforcement Section
U.S. EPA Region 4