United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report
Serv-Cold Acquisitions

Troy, Alabama
May 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 Serv-Cold Acquisitions (Serv-Cold) Facility located in Troy Alabama, of Pike County. This Facility was selected for inspection because it has never been inspected under the RMP. The inspection, which was conducted on May 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. Numerous documents were provided for review off site. This report will provide a background of the Facility and a listing of observations.

2.0 Background

The Serv-Cold Facility is located in Troy, Alabama. This Facility uses anhydrous ammonia for refrigeration purposes. The Facility has 13,190 pounds of anhydrous ammonia on site, and the Facility employs roughly 25 total employees. The Facility operates 5 days per week with one shift per day, and there is no labor union. All truck driving of product is handled by contracted truck drivers, and the Facility does not respond to emergencies. The anhydrous ammonia system is maintained on site by one trained operator and one support maintenance technician. The ammonia system encompasses three compressors, three blast chiller cells, one condenser tower on the roof of the Facility, and four cold storage units with suspended evaporators. The Facility also has a high-pressure receiver located directly outdoors of the primary ammonia machinery room. The safety system for the Facility is emergency ventilation which releases to atmosphere based on set point readings from anhydrous ammonia detectors. The loading dock for the storage warehouse is cooled via freon refrigerant. The background specifics are summarized as follows in Table 1.

TABLE 1: Inspection Information Summary

Inspection Team

Lead Inspector: Mark Briggs, Eastern Research Group, Inc. (ERG)
Inspector: Brendan Scher, ERG
Date of Facility Visit: May 1, 2024

Facility Identification

Name: Serv-Cold Acquisitions
Street Address: 1301 N 3 Notch Street
City: Troy County: Pike State: Alabama Zip: 36081
EPA Facility ID No: 100000207714
Dun & Bradstreet (D&B) No: 791167799
Latitude: 31.822306
Longitude: -85.959917

Name, address and phone of corporate parent company:
Owner/Operator: Serv-Cold Acquisitions
Mailing Address: 4321 Kingwood Drive # 148
City: Kingwood State: Texas Zip: 77345
Phone: N/A

Name, title, and email of person responsible for 40 C.F.R. Part 68 implementation:
Name: Wade Scott
Title: Refrigeration System Manager
Phone: : (918) 797-5183
Email: wadescott@arssco.com

Name and title of emergency contact:
Name: Phillip Maulden
Title: Emergency Contact
Day phone: (345) 500-2022
24-hour Phone: (479) 301-7458
Email: N/A

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

Name: Wade Scott
Title: Refrigeration System Manager
Phone: (918) 797-5183
Email: wadescott@arssco.com

Name: Phillip Maulden
Title: Refrigeration System Operator
Phone: (345) 500-2022
Email: phillipmaulden@arssco.com

Name: Craig Richter
Title: Ammonia Refrigeration Management Solutions
Phone: (281) 703-6489
Email: crichter@ammoniasolved.com

Note: This is a not a union facility.

Date and Program Levels of Submitted Risk Management Plan (RMP)

Date of initial submission: January 17, 2014
Date of most recent submissions: April 5, 2024
Process: Ammonia Refrigeration
Process ID: 100000207714
Program Level as reported in RMP: 3
NAICS code: 49312 (Refrigerated warehousing and storage)

3.0 Observations

The inspection of the Serv-Cold 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 began with an opening discussion of Facility operations. The discussion was followed by a tour of the Facility's ammonia refrigeration process areas. EPA inspectors then requested paperwork associated with the Facility's Risk Management Plan (RMP). The documents were reviewed by EPA inspectors on site and provided for review off site. An inspection out-brief was conducted where EPA inspectors described their observations. Observations from the RMP inspection at the Serv-Cold Facility are discussed below:

1. 40 C.F.R. § 68.65(d)(1)(iv) requires that information pertaining to the equipment in the process shall include relief system design and design basis.

    - Serv-Cold provided pressure relief valve (PRV) design information for the PRVs associated with the high-pressure receiver (HPR). Based on the data included in the documentation, the maximum PRV discharge vent piping length should be 2.391 feet based on American National Standards Institute (ANSI)/American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) 15, (2010). Serv-Cold's documentation indicates the PRVs discharge directly to atmosphere with no vent piping. During the EPA inspection, inspectors noted the PRVs now have a 1-inch diameter vent pipe that extends approximately 10-feet above the PRVs. The length of the PRV vent pipe is significantly longer than the calculated maximum PRV vent pipe length of 2.391 feet. Having a vent pipe longer than the calculated

maximum discharge vent length can create a backpressure on the PRVs causing them to potentially malfunction when relieving pressure in the HPR.

2. 40 C.F.R. § 68.65(d)(2) requires the owner or operator shall document that equipment complies with recognized and generally accepted good engineering practices (RAGAGEP).

   - During the Facility walkthrough, the Inspection Team observed the lack of an eyewash station and safety shower at the outdoor entrance to the ammonia machinery room (AMR).
     - American National Standards Institute/International Institute of Ammonia Refrigeration (ANSI/IIAR) 2, Standard for Design of Safe Closed-Circuit Ammonia Refrigeration Systems, (2021), Section 6.7.2 states, "A minimum of one eyewash/safety shower unit shall be located outside the machinery room and shall be no further than 55 ft. from the outside of the machinery room door."
     - ANSI/IIAR-9, Minimum Safety Requirements for Existing Closed-Circuit Ammonia Refrigeration Systems, (2020), Section 7.3.7.1 states, "Each machinery room shall have access to a minimum of two eyewash/safety shower units, one located inside the machinery room, and one located outside of the machinery room, each meeting the requirements in Section 7.3.7.3. Additional eyewash/safety shower units shall be installed such that the path of travel in the machinery room is no more than 55 ft to an eyewash/safety shower unit."

   - During the Facility walk-through, the Inspection Team observed improper labeling of ammonia piping both within the AMR and on the rooftop near the evaporative condenser. The labeling was either missing entirely or falling off of the piping.
     - ANSI/IIAR-2, Standard for Design of Safe Closed-Circuit Ammonia Refrigeration Systems, (2021), Section 5.14.6 states, "Ammonia piping mains, headers, and branches shall be identified with the following information:
       1. AMMONIA;
       2. Physical state of the ammonia;
       3. Relative pressure level of ammonia, being low or high as applicable;
       4. Pipe service, which shall be permitted to be abbreviated; and
       5. Direction of flow."
     - ANSI/IIAR-9, Minimum Safety Requirements for Existing Closed-Circuit Ammonia Refrigeration Systems, (2020), Section 7.2.9.4 states, "Ammonia piping mains, headers, and branches shall be identified with the following information:
       1. AMMONIA;
       2. Physical state of the ammonia;
       3. Relative pressure level of ammonia, being low or high as applicable;
       4. Pipe service, which shall be permitted to be abbreviated; and
       5. Direction of flow."

- ASME A13.1, Scheme for the Identification of Piping Systems, (2015), Section 3.1 states, "Arrows shall be used to indicate direction of flow. Where flow can be in both directions, arrows in both directions shall be displayed. Contents shall be identified by a legend with sufficient additional details such as temperature, pressure, etc. as are necessary to identify the hazard."

- During the Facility walkthrough, the Inspection Team observed oil drums being staged and stored outside of the AMR near combustible materials and oxygen tanks.
  - National Fire Protection Association 1(NFPA), Fire Code, (2024), Section 66.9.16.1 states, "Except as provided in 66.9.16.3 ignitable (flammable or combustible) liquids shall be separated from incompatible materials where the stored materials are in containers having a capacity of more than 5 lb (2.268 kg) or ½ gal (1.89 L)."
  - NFPA 30, Flammable and Combustible Liquids Code, (2024), Section 9.17.1 states, "Except as provided in 9.17.3 ignitable (flammable or combustible) liquids shall be separated from incompatible materials where the stored materials are in containers having a capacity of more than 5 lb (2.268 kg) or ½ gal (1.89 L)."

- During the Facility walk-through, the Inspection Team observed piping on the outdoor high-pressure receiver (HPR) lacking proper support to protect against excess vibration. There were multiple instances during the walk-through of the HPR in which the pictured piping shook excessively demonstrating the limitations of the existing piping supports.
  - ANSI/IIAR-2, Standard for Design of Safe Closed-Circuit Ammonia Refrigeration Systems, (2021), Section 5.11.5 states, "Supports and foundations shall be designed to prevent vibration or movement that causes damage, an unsafe condition, or loss of function to the equipment, connected refrigeration system components, or the building structure."
  - ANSI/IIAR-9, Minimum Safety Requirements for Existing Closed-Circuit Ammonia Refrigeration Systems, (2020), Section 7.2.7.1 states, "Piping, tubing, and equipment shall be supported to prevent excessive vibration and movement."

- During the Facility walkthrough, the Inspection Team observed that only one of the air cooling evaporative condensers in the cold storage warehouse was provided with adequate bump protection against potential vehicular impact.
  - ANSI/IIAR-2, Standard for Design of Safe Closed-Circuit Ammonia Refrigeration Systems, (2021), Section 5.15.1 states, "Enclosures for ammonia equipment shall be suitable for the installation location and shall be provided with protection from physical and environmental damage as required for the installed location."
  - ANSI/IIAR-9, Minimum Safety Requirements for Existing Closed-Circuit Ammonia Refrigeration Systems, (2020), Section 7.2.11.1 states, "Enclosures for ammonia equipment shall be suitable for the installation location and shall be provided with protection from physical and environmental damage as required for the installed location."

- NFPA 55, Compressed Gases and Cryogenic Fluids Code, (2023), Section 7.1.8.3.1 states, "Compressed gas cylinders, containers, tanks, and systems that could be exposed to physical damage shall be protected."
- NFPA 1, Fire Code, (2024), Section 63.3.1.10.4.1 states, "Compressed gas cylinders, containers, tanks, and systems that could be exposed to physical damage shall be protected."

- During the Facility walkthrough, the Inspection Team observed that the wall penetration of ammonia piping running between the primary AMR and an adjacent electrical room was not airtight.
  - ANSI/IIAR-2, Standard for Design of Safe Closed-Circuit Ammonia Refrigeration Systems, (2021), Section 6.2.5 states, "Air shall not flow to or from any portion of a premises that is routinely accessible to or occupied by people on a part-time or full-time basis through a machinery room unless the air is ducted and sealed to prevent ammonia leakage from entering the airstream. Access doors and panels in ductwork and air-handling units located in a machinery room shall be gasketed and tight-fitting."
  - ANSI/IIAR-2, Standard for Design of Safe Closed-Circuit Ammonia Refrigeration Systems, (2021), Section 6.6.2 states, "Pipes penetrating the machinery room separation shall be sealed to the walls, ceiling, or floor through which they pass in accordance with Section 6.2.1. Where Section 6.2.1 requires that the separation have a fire rating, pipe penetrations shall be fire stopped in accordance with the building code.
  - ANSI/IIAR-9, Minimum Safety Requirements for Existing Closed-Circuit Ammonia Refrigeration Systems, (2020), Section 7.3.2.5 states, "Air shall not flow to or from any portion of a premises that is routinely accessible to or occupied by people on a part-time or full-time basis through a machinery room unless the air is ducted and sealed to prevent ammonia leakage from entering the airstream. Access doors and panels in ductwork and air-handling units located in a machinery room shall be gasketed and tight fitting."
  - ANSI/ASHRAE-15, Compressed Gases and Cryogenic Fluids Code, (2016), Section 8.12(e) states, "All pipes piercing the interior walls, ceiling, or floor of such rooms shall be tightly sealed to the walls, ceiling, or floor through which they pass."

- During the Facility walkthrough, the Inspection Team observed that piping connected to both the exterior HPR and the oil pots on the compressors within the AMR lacked proper support to prevent physical damage which could cause a release.
  - ANSI/IIAR-2, Standard for Design of Safe Closed-Circuit Ammonia Refrigeration Systems, (2021), Section 13.4.1 states, "Piping hangers and supports shall carry the weight of the piping and any additional expected loads."
  - ANSI/IIAR-9, Minimum Safety Requirements for Existing Closed-Circuit Ammonia Refrigeration Systems, (2020), Section 7.2.12.1 states, "Where ammonia-containing equipment is installed in a location subject to physical damage, guarding or barricading shall be provided."

- ANSI/IIAR-9, Minimum Safety Requirements for Existing Closed-Circuit Ammonia Refrigeration Systems, (2020), Section 7.3.2.2 states, "Piping supports shall carry the weight of the piping system including contents and insulation; if necessary, provide sway bracing to minimize vibration."

- During the Facility walkthrough, the Inspection Team observed that there were unlabeled ammonia alarms throughout the AMR and cold storage warehouse portions of the Facility.
  - ANSI/IIAR-2, Standard for Design of Safe Closed-Circuit Ammonia Refrigeration Systems, (2021), Section 17.6 states, "Ammonia leak detection alarms shall be identified by signage adjacent to visual and audible alarm devices."
  - ANSI/IIAR-9, Minimum Safety Requirements for Existing Closed-Circuit Ammonia Refrigeration Systems, (2020), Section 7.2.9.1(2) states, "The meaning of each alarm shall be clearly marked by signage near the visual and audible alarms."
  - ANSI/IIAR-9, Minimum Safety Requirements for Existing Closed-Circuit Ammonia Refrigeration Systems, (2020), Section 7.3.12.6 states, "Ammonia leak detection alarms shall be identified by signage adjacent to visual and audible alarm devices."

- During the Facility walkthrough, the Inspection Team observed that there was excessive accumulation of ice on pumps within the AMR.
  - ANSI/IIAR-2, Standard for Design of Safe Closed-Circuit Ammonia Refrigeration Systems, (2021), Section 5.10.1 states, "Piping and equipment surfaces not intended for heat exchange shall be insulated, treated, or otherwise protected to mitigate effects of condensation and excessive frost buildup to a level that interferes with valve operation or creates damage to piping, equipment or supports. Portions of a system that have the potential for condensation shall not be placed above electrical equipment unless the electrical equipment is protected from damage caused by condensation."
  - ANSI/IIAR-6, Standard for Inspection, Testing, and Maintenance of Closed-Circuit Ammonia Refrigeration Systems (2019), Section 5.6.8 states, "Equipment and piping shall be kept free from excessive ice buildup."
  - ANSI/IIAR-9, Minimum Safety Requirements for Existing Closed-Circuit Ammonia Refrigeration Systems, (2020), Section 7.2.6.1 states, "Piping and equipment surfaces not intended for heat exchange shall be insulated, treated, or otherwise protected to mitigate condensation and excessive frost buildup where the surface temperature is below the dew point of the surrounding air during normal operation and in an area where condensation and frost could develop and become a hazard to occupants or cause damage to the structure, electrical equipment, or refrigeration system."

- During the Facility walkthrough, the Inspection Team observed that oil pots within the AMR lacked plugs at the end of the piping.
  - Section 5.9.3(3) of ANSI/IIAR-2 (2021) states, "Oil removal shall be accomplished by one or more of the following: A valve and piping assembly

at the draining point where oil is removed from the system. At a minimum, a shut-off valve in series with a self-closing shut-off valve is required. All piping to atmosphere for oil draining shall be designed to be capped when not in use."

- During the Facility walkthrough, the Inspection Team observed that there were flammable materials such as propane used as fuel for a space heater being stored within the AMR.
    - ANSI/IIAR-2, Standard for Design of Safe Closed-Circuit Ammonia Refrigeration Systems, (2021), Section 6.4 states, "Combustible materials or flammable liquids shall not be stored in machinery rooms outside of approved fire-rated storage containers."
    - ANSI/IIAR-9, Minimum Safety Requirements for Existing Closed-Circuit Ammonia Refrigeration Systems, (2020), Section 7.2.6.1 states, "Combustible materials shall not be stored in machinery rooms outside of approved fire-rated storage containers."
    - IFC, International Fire Code, (2015), Section 606.11 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."

- During the Facility walkthrough, the Inspection Team observed that the ammonia pressure relief header discharge vent discharged both horizontally and below the roof-level of the AMR.
    - ANSI/IIAR-2, Standard for Design of Safe Closed-Circuit Ammonia Refrigeration Systems, (2021), Section 15.5.1.3 states, "The discharge termination from piping relieving to atmosphere shall not be less than 7.25 ft (2.2 m) above a roof. Where a higher adjacent roof level is within 20 ft (6.1 m) horizontal distance from the relief discharge, the discharge termination shall not be less than 7.25 ft (2.2 m) above the height of the higher adjacent roof."
    - ANSI/IIAR-2, Standard for Design of Safe Closed-Circuit Ammonia Refrigeration Systems, (2021), Section 15.5.1.5 states, "The termination of the discharge shall be directed upward and arranged to avoid spraying ammonia on persons in the vicinity."
    - ANSI/IIAR-9, Minimum Safety Requirements for Existing Closed-Circuit Ammonia Refrigeration Systems, (2020), Section 7.4.2.2 states, "The discharge termination from pressure relief devices relieving to atmosphere shall not be less than 7.25 ft (2.2 m) above a roof that is occupied solely during service and inspection. Where a higher adjacent roof level is within 20 ft (6.1 m) horizontal distance from the relief discharge, the discharge termination shall not be less than 7.25 ft (2.2 m) above the height of the higher adjacent roof."

- ANSI/ASHRAE-15, Compressed Gases and Cryogenic Fluids Code, (2016), Section 9.7.8.2(a) states, "The point of vent discharge shall be located not less than 15 ft (4.57 m) above the adjoining ground level."

- During the Facility walkthrough, the Inspection Team observed that ammonia piping on the roof above the AMR near the evaporative condenser showed signs of damage from corrosion.
  - ANSI/IIAR-2, Standard for Design of Safe Closed-Circuit Ammonia Refrigeration Systems, (2021), Section 13.4.2 states, "Refrigerant piping shall be isolated and supported to prevent damage from vibration, stress, corrosion, and physical impact."
  - ANSI/IIAR-6, Standard for Inspection, Testing, and Maintenance of Closed-Circuit Ammonia Refrigeration Systems (2019), Section 11.1 states, "ITM tasks shall be performed on carbon steel and stainless-steel piping at the indicated frequencies set forth in Table 11.1 or per manufacturers' instructions, unless a different frequency is justified in accordance with Section 5.2.1."

- During the Facility walkthrough, the Inspection Team observed that the set point for each ammonia alarm on the control panel in the office building was 100 ppm.
  - ANSI/IIAR-2, Standard for Design of Safe Closed-Circuit Ammonia Refrigeration Systems, (2021), Section 17.7.2(2) states, "The detector shall activate an alarm that reports to a monitored location so that corrective action can be taken at an indicated concentration of 25 ppm or higher."
  - ANSI/IIAR-9, Minimum Safety Requirements for Existing Closed-Circuit Ammonia Refrigeration Systems, (2020), Section 7.3.12.2(1) states, "Activates an alarm to a monitored location so an immediate response can be set in place at a detected concentration of no higher than 50 ppm."

- During the Facility walkthrough, the Inspection Team observed that there were no NFPA diamonds present on the outdoor HPR.
  - Section 5.14.2 of ANSI/IIAR-2 (2021) states, "NFPA 704 Placards – Buildings and facilities with refrigeration systems shall be provided with placards that display information in accordance with NFPA 704. For equipment located outdoors, the placard shall display the following degrees of hazard: Health-3, Flammability-1, Instability-0."
  - Section 7.2.9.1.1 of ANSI/IIAR-9 (2020) states, "Buildings and facilities with refrigeration systems shall be provided with placards in accordance with NFPA 704."
  - National Fire Protection Association (NFPA) 704, Standard System for the Identification of the Hazards of Materials for Emergency Response (2022), Section 9.1 states, "Symbol Arrangement. One of the systems delineated in Figure 9.1(a), Figure 9.1(b), or Figure 9.1(c) shall be used for the implementation of this standard."

- During the Facility walkthrough, the Inspection Team observed that the entry to the AMR from the product storage areas was not locking and had a hole where the door handle was once located.
    - ANSI/IIAR-2, Standard for Design of Safe Closed-Circuit Ammonia Refrigeration Systems, (2021), Section 6.3.3 states, "Access to a machinery room shall be restricted to authorized personnel. Signage on machinery room doors shall comply with Section 6.15."
    - ANSI/IIAR-9, Minimum Safety Requirements for Existing Closed-Circuit Ammonia Refrigeration Systems, (2020), Section 7.3.3.4 states, "Access to a machinery room shall be restricted to authorized personnel. Signage on machinery room doors shall comply with Section 7.2.9."

3. 40 C.F.R. § 68.67(c)(3) requires the process hazard analysis (PHA) to address engineering and administrative controls applicable to the hazards and their interrelationships such as appropriate application of detection methodologies to provide early warning of releases and standby or emergency power systems. (Acceptable detection methods might include process monitoring and control instrumentation with alarms, and detection hardware such as hydrocarbon sensors.)

    - The Facility's most recent process hazard analysis revalidation report was performed on September 18, 2020, by a third-party company Ammonia Refrigeration Management Solutions, LLC. The technique utilized for the PHA was the "What-If/Checklist" analysis of different process hazards. The listed engineering and administrative controls used in this analysis were often vague and insufficient as measures of control against the stated hazard. For example, Item 1.01 on the checklist assesses the scenario where "An overpressure condition exists and there is no SRV. This causes a leak or rupture, resulting in an NH3 release." This scenario has the listed controls of "Proper system design" and "Proper safety equipment installed". These are generic programmatic solutions which are not specific to controlling the listed scenario for the Facility's specific system.

4. 40 C.F.R. § 68.69(c) requires the operating procedures shall be reviewed as often as necessary to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to stationary sources. The owner or operator shall certify annually that these operating procedures are current and accurate.

    - The Facility's operating procedures covering the safe removal of oil from vessel oil pots is titled "Oil Removal" and was certified on May 16, 2024. Step 7 of the procedure states "Slowly unscrew cap from oil drain line that the bucket is placed under. As cap is being unthreaded, move cap back and forth to remove pressure that may have accumulated between the valves."

5. 40 C.F.R. § 68.75(a) requires the owner or operator shall establish and implement written procedures to manage changes (except for "replacements in kind") to process chemicals, technology, equipment, and procedures; and changes to stationary sources that affect a covered process.

- Serv-Cold provided pressure relief valve (PRV) design information for the PRVs associated with the high-pressure receiver (HPR). Based on the data included in the documentation, the maximum PRV discharge vent piping length should be 2.391 feet based on ANSI/ASHRAE-15 (2010). Serv-Cold's documentation indicates the PRVs discharge directly to atmosphere with no vent piping. During the EPA inspection, inspectors noted the PRVs now have a 1-inch diameter vent pipe that extends approximately 10-feet above the PRVs. During onsite review of the Facility's management of change (MOC) documentation, no MOC was provided for the change to the Facility's PRV. Failure to document a change to the covered process is inconsistent with the requirements of 40 CFR § 68.75(a).

6. 40 C.F.R. § 68.79(d) requires the owner or operator shall promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected.

    - The Facility's most recent compliance audit was conducted by third party Ammonia Refrigeration Management Solutions, LLC on October 8, 2021. The report outlines a risk ranking hierarchy for findings from A to D with A requiring immediate action to correct a deficiency, and D requiring the deficiency to be addressed within 180 days. In the recommendations summary on Page 5 of the report, there are 7 recommendations listed from the compliance audit; however, none of the recommendations have been assigned a due date, risk rating, or person responsible for rectifying the deficiency.

    - In the Facility's 2018 compliance audit, the recommendations starting on Page 74 are also missing the assignment of responsibility, priority level, and expected date of completion. Additionally, some findings are repeated between the two compliance audits. For example, in 2018 a mechanical integrity finding states, "No documentation exists on hot work training.". In 2021, a mechanical integrity finding states, "Develop a training program that addresses how mechanics will be trained."

Inspection Report

Prepared by:

CALLIE SOTOLONGO

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Callie Sotolongo, Inspector-In-Training
South Air Enforcement Section
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JORDAN NOLES

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

Approved by:

CARRIE GRIFFITH

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for Todd Groendyke, Section Chief
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