



REGION 4

ATLANTA, GA 30303

SENT VIA ELECTRONIC MAIL

Danny Moseley
Plant Manager
United Packers of Mobile
Coca-Cola Bottling Company United, Inc.
5300 Coca Cola Road
Mobile, Alabama 36619
Dannymoseley@ccbcu.com

Dear Danny Moseley:

Enclosed is a copy of the final Inspection Report (Enclosure A) generated by the Environmental Protection Agency Region 4 Air Enforcement Branch for the December 11, 2024, partial compliance inspection of the Coca-Cola Bottling Company United, Inc., facility located at 5300 Coca-Cola Road, Mobile, Alabama.

The EPA previously sent a copy of the draft report in an email on January 30, 2025, allowing the Coca-Cola Bottling Company United, Inc., to make any comments regarding the report and to claim any information contained in the report as confidential business information (CBI). In an email dated February 4, 2025, the Coca-Cola Bottling Company United, Inc., notified EPA that no information was being claimed CBI.

Should you have any questions regarding the inspection report, please contact me at (404) 562-9198, or by email at warrilow.phyllis@epa.gov.

Sincerely,

**PHYLLIS
WARRILOW**

Phyllis Warrilow, PE
Environmental Engineer
South Air Enforcement Section

Digitally signed by PHYLLIS
WARRILOW
Date: 2025.02.06 10:38:43
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Enclosure

ENCLOSURE A
INSPECTION REPORT

**United States Environmental Protection Agency (EPA) Region 4
Air Enforcement Branch
Inspection Report**

I. GENERAL INFORMATION

Facility Name: United Packers of Mobile, Coca-Cola Bottling Company United

Location (Address): 5300 Coca-Cola Road, Mobile, Alabama 36619

Inspection Date: December 11, 2024

Type of Inspection (Full or Partial Compliance Evaluation):

Partial Compliance Evaluation focused on the Clean Air Act (CAA) 112 (r)(1) General Duty Clause requirements of the ammonia refrigeration system.

ICIS-Air Number: 3601756357

EPA Region 4 Investigator(s)/Inspector(s):

1. Phyllis Warrilow, Environmental Engineer

State/Local Investigator(s)/Inspector(s):
none

Person(s) Contacted at Facility (Name and Title):

1. Danny Moseley, Plant Manager
2. Julia Thomas, Management Systems Manager
3. Alex Clark, EHS Specialist
4. Justin Kicbo, Maintenance Manager
5. Chuck Hill, Corporate EHS manager for Production, via telephone

Report Prepared by: Phyllis Warrilow

II. FACILITY INFORMATION

A. Facility and Permit Information

Facility and Permit Information	Comments
1. Type of facility (e.g., chemical plant, refinery, cement manufacturer, etc.).	NAICS 312111 – Soft Drink Manufacturing.
2. Air permit number(s) and type of permit (e.g., Title V, PSD, Synthetic Minor, etc.).	N/A
3. Air permit issuance date.	N/A
4. Air permit expiration date.	N/A
5. Facility classification (Major, Synthetic Minor/Conditional Major, Minor).	N/A
6. Major source pollutants (if applicable).	N/A
7. Applicable regulations (e.g., State Implementation Plan, MACT Subpart FFFF, NSPS Subpart EEEE, etc.).	Clean Air Act § 112(r)(1)
8. Types of air emission points (e.g., tanks, process vents, boilers, etc.).	Ammonia refrigeration system
9. Types of air pollution control equipment (e.g., baghouse, scrubber, afterburner, etc.).	N/A

B. Process Description

United Packers of Mobile, Coca-Cola Bottling Company United (Facility) located at 5300 Coca Cola Road, Mobile, Alabama is classified under NAICS Code 312111, Soft Drink Manufacturing. The United Packers Mobile, Coca-Cola Bottling Company United location is owned by Coca-Cola Bottling Company United. The Mobile Coca-Cola manufacturing facility was originally located in downtown Mobile, Alabama. In 1974, the facility was moved to its present location at 5300 Coca-Cola Road and has been owned and operated by Coca-Cola Bottling Company United since 2017. The facility includes a total of 100,000 square feet of operations comprised of three bottling lines producing bottles and cans of soft drinks. The facility operates all year, with 5-day weeks and 2 shifts plus maintenance per day. The facility employs approximately 101 persons.

The facility uses an ammonia refrigeration system to cool the manufacturing production lines and product. The facility had 6,000 lbs of ammonia on site at the time of the inspection per invoices.

III. INSPECTION ACTIVITIES

Activity	Yes No NA	Comments
Opening Meeting		
1. Date and time entered the facility.	Y	The EPA Region 4 (R4) inspector arrived at the Facility on December 11, 2024, at approximately 10:00 AM EDT
2. Credentials presented to facility personnel (include name and title).	Y	The EPA Inspector presented credentials to: Danny Moseley - Plant Manager, Julia Thomas - Management Systems Manager, Alex Clark -EHS Specialist, Justin Kimbro – Maintenance Manager.

Activity	Yes No NA	Comments
3. Conducted an opening meeting to explain the purpose and objectives of the inspection.	Y	The opening conference began at 10:40 AM EDT during which the purpose and objectives of the inspection were explained. The opening conference was led by EPA inspector Phyllis Warrilow as well as members of United Packers of Mobile, Coca-Cola Bottling United management. The inspector explained that they were conducting a Clean Air Act inspection specifically focused on the General Duty Clause requirements of the ammonia refrigerant system.
4. Discussed safety issues.	Y	The inspector discussed Facility-specific safety and emergency procedures. Ear plugs, safety glasses, coats, gloves, shoe, and hair coverings were provided as needed.

Activity	Yes No NA	Comments
5. Discussed which records to be reviewed.	Y	The EPA inspector requested to review the following records: - Piping and instrumentation diagrams for the ammonia refrigeration system - Hazard assessment for the ammonia refrigeration system - Standard operating procedures relating to the ammonia refrigeration system - Documentation of the preventive maintenance/mechanical integrity program for the ammonia refrigeration system - Records of the most recent calibration or testing of any ammonia sensors/alarms - Pressure Relief Valve recertifications - Facility's emergency response plan or emergency action plan - Documentation of the total amount of ammonia in the refrigeration system
6. Discussed the facility walk-through and the areas to be observed in the facility.	Y	
7. Discussed facility policy regarding photographs or video (if applicable).	N/A	
8. Discussed the use of the infrared camera, TVA, PID, and any other equipment.	N/A	
9. Discussed CBI.	Y	EPA inspectors indicated that any documents claimed to be Confidential Business Information (CBI) would be treated in accordance with regulations.

Activity	Yes No NA	Comments
Records Reviewed at the Facility 10. The types of records reviewed, and the time period reviewed.	Y	EPA inspectors requested the following records during the inspection: - Documentation of the total amount of ammonia in the refrigeration system. -Piping and instrumentation diagrams for the ammonia refrigeration system. -Process Hazard Analysis. -Documentation of the preventive maintenance/mechanical integrity program for the ammonia refrigeration system. -Standard operating procedures relating to the ammonia refrigeration system -Confirmation of the most recent calibration or testing of any ammonia sensors/alarms, - Records of Pressure Relief Valve recertifications. (Required every 5 years), -Facility's emergency response plan or emergency action plan. Records of the Process Hazard Analysis for the ammonia refrigeration system were not presented to EPA at the time of the inspection.

Activity	Yes No NA	Comments
Facility Walk-Through Observations		
11. The process equipment observed and the associated operational rate observed (e.g., Furnace 1 production rate was 5 lbs/hr on 1/1/15, at 2:00 pm – permit requires max rate at 6 lbs/hr). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	Y	The facility has ten compressors. Compressor Number 1, 3,4,5,6 and 10 were not running at the time of the inspection. Compressors 2,7,8 and 9 were operating at time of the inspection. At approximately 1:53 PM on Dec 11, 2024: Compressor Number 2 was observed to be operating at a discharge pressure of 145 PSIG and a suction pressure of 24 PSIG. Compressor Number 7 was observed to be operating at a discharge pressure of 150 PSIG and a suction pressure of 32 PSIG. Compressor Number 8 was observed to be operating at a discharge pressure of 150 PSIG and a suction pressure of 26 PSIG.

Activity	Yes No NA	Comments
12. The type of process parametric monitoring observed and the associated value observed (e.g., Furnace 1 flux injection rate was 200 lbs/batch at 1/1/15, at 2:00 pm – permit requires max rate at 225 lbs/batch). Provide the date and time the information was recorded by the inspector. 13. Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
14. If process equipment or parametric monitoring equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	

Activity	Yes No NA	Comments
15. The type of air pollution control equipment, the process equipment it is controlling, and the associated parametric monitoring value observed (e.g., baghouse pressure drop, temperature, scrubber flow rate, etc.). (For example - RTO 1 controlling furnace 1, 1,500 degrees F on 1/1/15, at 2:00 pm – permit requires 1,400 degree F or higher). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	

Activity	Yes No NA	Comments
16. Continuous emissions monitoring devices and values observed. (e.g., CEMS, COMs, etc.). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	As part of the walk through at approximately 1:50 pm on Dec 11, 2024, the EPA inspector observed ammonia detectors in the machine room and throughout the facility. The facility operates 7 ammonia detectors. The last calibration of the ammonia sensors occurred September 19, 2024. The facility stated that the next calibration was scheduled for March of 2025. The pressure safety relief valves in the machine room were current and will expire in April of 2025 with the exception of PSV2 which was installed October 2, 2024, along with some other maintenance and it will expire in 2029.
17. If air pollution control equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	
18. Capture and collection system (enclosures and hoods) observations, if applicable (e.g., the magnitude and duration of emission escaping capture from the hood).	N/A	

Activity	Yes No NA	Comments
19. Ductwork transferring the emissions to the air pollution control device observations, if applicable (e.g., the magnitude and duration of emission escaping from the ductwork, holes or deterioration in ductwork, no deterioration observed, etc.).	N/A	
20. Any existing unpermitted emission points, new unpermitted emission points, or non-permitted construction activities observed. (if yes, describe in the comments field).	N/A	
21. Were any visible emissions observed? (if yes, identify the location and equipment).	N/A	
22. Was a Method 9 reading performed? (if yes, identify the location and equipment).	N/A	
23. Was the cause of the visible emissions investigated and the information documented?	N/A	

Activity	Yes No NA	Comments
24. Was a Method 22 performed for visible emissions? (if yes, identify the location and equipment).	N/A	
25. Identify the cause of the visible emissions as explained by facility personnel, if applicable.	N/A	
26. Was the infrared camera used? If so, attach the video log (which includes the equipment ID, and the date and time the video was recorded) and videos to this report.	N/A	
27. Was the TVA used? If so, identify the equipment monitored and the results. Provide the date and time the information was recorded by the inspector. Include actual instrument readings for each piece of equipment monitored above the leak definition and/or where the infrared camera identified a release. An attachment may be used for a large amount of information.	N	

Activity	Yes No NA	Comments
28. Was the PID used? If so, identify how the PID was used and the results. Provide the date and time the information was recorded by the inspector. An attachment may be used for a large amount of information.	N/A	
Closing Meeting		
29. Conducted a closing meeting.	Y	The closing meeting was conducted starting at 2:38 PM on December 11, 2024. Attendees were the same as were present for the opening meeting except for the Plant Manager.
30. Summarize any additional information needed, if applicable?	Y	Facility had all requested documents except for the Process Hazard Analysis.
31. Accept a declaration of CBI, if applicable?	N/A	

Activity	Yes No NA	Comments
32. Discussed observations.	Y	The facility's mechanical equipment and mechanical integrity program was implemented by maintenance personnel. Some records were computerized and easily retrievable. The Facility was able to verify the following records for the ammonia refrigerant system: - Documentation of the total amount of ammonia in the refrigeration system - Pressure safety valve certifications. - Dates of the most recent calibration or testing of any ammonia sensors/alarms. - Process & Instrumentation Diagram - Standard Operating Procedures - Preventative Maintenance records - Facility Emergency Response Plan Mechanical Integrity and Preventative maintenance were kept on schedule by maintenance personnel and ammonia refrigeration contractors. Process Hazard Analysis was not available at the time of the inspection.

Activity	Yes No NA	Comments
33. Discussed next steps, if applicable?	Y	A final inspection report from EPA Region 4 will be sent to the company within a 70-day timeframe. Document requests were discussed.
34. Date and time inspection concluded.		On December 11, 2024, at approximately 2:50 PM the Region 4 inspector left the Facility and concluded the inspection.
Miscellaneous		
34. Include any additional observations, if applicable.	Y	Process Hazard Analysis for the ammonia refrigeration system are to be received from the facility as acknowledged above.

EPA Investigator/Inspector Signature: PHYLLIS WARRILOW Digitally signed by PHYLLIS WARRILOW
Date: 2025.02.06 10:39:39 -05'00'

EPA Supervisor Signature & Title TODD GROENDYKE Digitally signed by TODD GROENDYKE
Date: 2025.02.06 11:50:03 -05'00'

Date Report Finalized: 2/6/2025

APPENDICES AND ATTACHMENTS

Appendix A: Document Receipt Log

No documents were obtained from Facility representatives during the on-site inspection.