

**Region 6 Enforcement and Compliance Assurance Division
INSPECTION REPORT**

Inspection Date(s):	9/17/2024 to 9/18/2024	
Media Program:	Air	
Regulatory Program(s)	Clean Air Act (CAA) § 112(r) and 40 Code of Federal Regulations (C.F.R.) Part 68 Chemical Accident Risk Management Plan (RMP) Program 3	
Company Name:	Molson Coors USA LLC	
Facility Name:	Molson Coors USA LLC	
Facility Physical Location:	7001 South Freeway	
(city, state, zip code)	Fort Worth, TX 76134	
Mailing address:	7001 South Freeway	
(city, state, zip code)	Fort Worth, TX 76134	
County/Parish:	Tarrant	
Facility Contact:	Brad Greer	Sr Mgr Technical Services
	bradley.greer@molsoncoors.com	
FRS Number:	110000459753	
Identification/Permit Number:	1000 0002 2673	
Media Identifier Number:	1000087407	
NAICS:		
Personnel participating in inspection:		
Blake Sieminski	Lead Inspector/Enforcement Officer	U.S. EPA
John Penland	Enforcement Officer	U.S. EPA
Brad Greer	Tech Services Manager	Molson Coors
Justin Southern	Operator/ Union Representative	Molson Coors
Rich Gonzales	Safety Manager	Molson Coors
Janeth Rodriguez	Environmental & Sustainability Engineer	Molson Coors
Rudy Juarez	Optimization Engineer	Molson Coors
Jim Crawford	Vice President and Plant Manager	Molson Coors
EPA Lead Inspector Signature/Date	BLAKE SIEMINSKI Digitally signed by BLAKE SIEMINSKI Date: 2024.11.19 11:54:50 -06'00'	
	Blake Sieminski	Date
Supervisor, ECDSC Signature/Date	DALE THRUSH Digitally signed by DALE THRUSH Date: 2024.11.21 14:32:52 -06'00'	
	Samuel Tates	Date

Section I – INTRODUCTION PURPOSE OF THE INSPECTION

I, Blake Sieminski and John Penland, the Environmental Protection Agency (EPA) Region 6 inspectors arrived at the Molson Coors USA LLC Facility at approximately 9:00 a.m. on September 17, 2024, for an announced inspection. I met with Molson Coors USA LLC facility representatives at the opening meeting. I presented my credentials and informed them that this was an EPA led inspection to determine compliance with the Clean Air Act (CAA) Section 112(r). The scope of the inspection was a partial compliance evaluation (PCE) and included evaluation of the compliance with 40 C.F.R. Part 68 – Chemical Accident Prevention Provisions, CAA Section 112(r)(7), and the General Duty Clause (GDC), CAA Section 112(r)(1).

FACILITY DESCRIPTION

Molson Coors USA LLC (Molson Coors) is located in Fort Worth, Texas and is engaged in the beverage production business. The facility is located at 7001 South Freeway Fort Worth, TX 76134. The NAICS code is 31212 for breweries. The facility is a Program Level 3 facility and has approximately 115000 pounds of ammonia (anhydrous) on site. The facility currently has 535 full time employees.

Section II – OBSERVATIONS

EPA Inspectors conducted a walk-through of the facility, accompanied by facility representatives, to observe the facility process equipment, and overall operations. Other inspection findings and observations are noted in the RMP Program Level 3 Checklist, located in **Appendix #1**.

During the walk-through, I observed that the facility was missing proper markings on piping *e.g., direction of flow, color-coding to identify the hazardous material present, placement of pipe labels, and type and size of letters on pipe labels*, as required by the American National Standards Institute (ANSI) and the American Society of Mechanical Engineers (ASME) Standard ANSI/ASME A13.1, *Scheme for the Identification of Piping Systems*. This standard is considered a recognized and generally accepted good engineering practice for above ground piping systems [**AOC 3: § 68.65(d)(2)**].

Closing Meeting – EPA convened a closing meeting on September 18, 2024, to discuss the Areas of Concern (AOC) noted during the inspection, the inspection completion process, and to answer questions from plant representatives.

Section III – AREAS OF CONCERN

1. 40 C.F.R. § 68.10(a) Applicability.

(b) By March 14, 2018, the owner or operator of a stationary source shall comply with the emergency response coordination activities in § 68.93, as applicable.

Molson Coors failed to comply with the emergency response coordination activities in § 68.93. Molson Coors failed to consult with local emergency response officials to establish appropriate schedules and plans for field and tabletop exercises required under [§ 68.96\(b\)](#). As well as request an opportunity to meet with the local emergency planning committee (or equivalent) and/or local fire department as appropriate to review and discuss those materials. Molson Coors failed shall document coordination with local authorities, including: The names of individuals involved and their contact information (phone number, email address, and organizational affiliations); dates of coordination activities; and nature of coordination activities.

2. 40 C.F.R. § 68.10(d) Applicability

(d) By December 19, 2023, the owner or operator shall have developed plans for conducting emergency response exercises in accordance with provisions of § 68.96, as applicable.

Molson Coors failed to develop a plan to conduct emergency exercises in accordance with provisions of § 68.96, as applicable. Molson Coors RMP noted that the local fire department annually conducts a Fire Safety Inspection of the brewery and participates in a brewery tour. When asked about emergency exercises, brewery personnel acknowledged that no RMP specific response exercises were being conducted.

3. 40 C.F.R. § 68.65(d)(2)- Process safety information.

(b)(2) The owner or operator shall ensure and document that the process is designed and maintained in compliance with recognized and generally accepted good engineering practices.

Molson Coors failed to properly label and maintain the equipment and associated piping as required by ANSI/ASME Standard A13.1, Scheme for the Identification of Piping Systems. Pipe labels needing repair or replacing were identified in the 2022 PHA and 2024 Compliance Audit.

4. 40 C.F.R. § 68.73(d)(1)- Mechanical Integrity

(d) (4) The owner or operator shall document each inspection and test that has been performed on process equipment. The documentation shall identify the date of the inspection or test, the name of the person who performed the inspection or test, the serial number or other identifier of the equipment on which the inspection or test was performed, a description of the inspection or test performed, and the results of the inspection or test.

The Molson Coors work order #8196999 to inspect an ammonia transfer pump on 05/06/2024 does not clearly identify the name of the person who performed the inspection or test. The document also fails to provide a description of the inspection or test performed on the pressure gauges and the results of the inspection list a handwritten note of “good” and “N/A”.

5. 40 C.F.R. § 68.73(e)- Mechanical Integrity - Equipment deficiencies.

(e) The owner or operator shall correct deficiencies in equipment that are outside acceptable limits (defined by the process safety information in § 68.65) before further use or in a safe and timely manner when necessary, means are taken to assure safe operation.

The Molson Coors document titled “Equipment Deficiencies” shows open orders to replace ammonia sensors within 30 days of April 18, 2024. As well as replace bad ammonia piping within 30 days of the designated due date. These items were still open at the time of inspection.

6. 40 C.F.R § 68.79 9(d) – Compliance Audits

(d) 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.

Molson Coors conducted a compliance audit in 2024 that identified deficient pipe labels in items #997 and #998 of the PSM Tracker. These items were previously identified as needing repair/maintenance in 2022 PHA, the target due date on the PSM Tracker is 06/30/2025.

7. 40 C.F.R. § 68.81(b) Incident investigation.

(b) An incident investigation shall be initiated as promptly as possible, but not later than 48 hours following the incident.

The August 3, 2024 gasket failure incident investigation was initiated on August 5th, 2024 12:45pm, after the 48-hour window allowed by part 68.81(b). Per the incident report, an above IDLH release was recorded, ranging from a maximum of 500ppm to an average 300ppm for the duration of the release. The investigation determined a transition lock was improperly used to lock open a liquid valve along with open pump out valves allowing liquid to backflow from the in-service unit cooler overnight.

8. 40 C.F.R. § 68.93 Emergency response coordination activities.

(a) Coordination shall occur at least annually, and more frequently if necessary, to address changes: At the stationary source; in the stationary source's emergency response and/or emergency action plan; and/or in the community emergency response plan.

(b) Coordination shall include providing to the local emergency planning and response organizations: The stationary source's emergency response plan if one exists; emergency action plan; updated emergency contact information; and other information necessary for developing and implementing the local emergency response plan. For responding stationary sources, coordination shall also include consulting with local emergency response officials to establish appropriate schedules and plans for field and tabletop exercises required under § 68.96(b). The owner or operator shall request an opportunity to meet with the local emergency planning committee (or equivalent) and/or local fire department as appropriate to review and discuss those materials.

(c) The owner or operator shall document coordination with local authorities, including: The names of individuals involved and their contact information (phone number, email address, and organizational affiliations); dates of coordination activities; and nature of coordination activities.

Molson Coors failed to annually coordinate and document emergency response coordination activities with the LEPC. Molson Coors noted in the RMP submission that they conduct annual Fire Safety Inspections of the brewery and but could not provide documentation of coordination activities during EPA's inspection.

9. 40 C.F.R. § 68.96 (b) Emergency response exercises

(b) Emergency response exercise program. The owner or operator of a stationary source subject to the requirements of § 68.95 shall develop and implement an exercise program for its emergency response program, including the plan required under § 68.95(a)(1). Exercises shall involve facility emergency response personnel and, as appropriate, emergency response contractors. When planning emergency response field and tabletop exercises, the owner or operator shall coordinate with local public emergency response officials and invite them to participate in the exercise.

Molson Coors failed to develop and implement an exercise program for its emergency response program. Specifically, Molson Coors did not conduct field and/or tabletop exercises or coordinate with LEPC officials and invite them to participate in the exercise.

10. 40 C.F.R. § 68.160 (b)(6) Registration.

(6) The name, title, telephone number, 24-hour telephone number, and, as of June 21, 2004, the e-mail address (if an e-mail address exists) of the emergency contact.

Molson Coors listed a 24-hours telephone number that belonged to a single employee's cell phone and when called would go to a personal voicemail instead of a manned 24-hour phone in case of emergency.

11. 40 C.F.R. § 68.180 (a) Emergency response program and exercises.

(a) The owner or operator shall provide in the RMP:

(1) Name, phone number and email address of local emergency planning and response organizations with which the stationary source last coordinated emergency response efforts, pursuant to § 68.10(g)(3) or § 68.93.

(2) The date of the most recent coordination with the local emergency response organizations, pursuant to § 68.93

Molson Coors failed to document the name, phone number and email address of local emergency planning and response organizations and date of the most recent coordination with the LEPC.

Section IV – FOLLOW UP

There were no additional records requested and no additional follow up for this inspection.

Section V – LIST OF APPENDICES

Appendix #1 – RMP Program 1 Checklist

Symbol Key: Y - Yes, N - No, N/A - Not Applicable; S - Satisfactory, M - Marginal, U – Unsatisfactory.

Appendix #2 – Photo Log

Appendix 2

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 1

Location: Molson Coors LLC		
City: Fort Worth	County/Parish: Tarrant	State: Texas





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Molson Coors LLC		
City: Fort Worth	County/Parish: Tarrant	State: Texas





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Molson Coors LLC		
City: Fort Worth	County/Parish: Tarrant	State: Texas





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 4

Location: Molson Coors LLC		
City: Fort Worth	County/Parish: Tarrant	State: Texas





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Molson Coors LLC		
City: Fort Worth	County/Parish: Tarrant	State: Texas





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Molson Coors LLC		
City: Fort Worth	County/Parish: Tarrant	State: Texas

