

United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report

Dothan Warehouse Freezer Storage

Dothan, Alabama

March 01, 2022

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 an ammonia refrigeration process at the Dothan Warehouse Freezer Storage facility located in Dothan, Houston County, Alabama. This facility was selected for inspection because it has never been inspected under the RMP. The inspection, which was conducted on March 01, 2022, consisted of a discussion of and request for program documentation, as well as a site review of various aspects of facility operations. Personnel from the facility participated throughout the inspection. Documents were provided for review. This report will provide a background of the facility and a listing of observations.

2.0 Background

The Dothan Warehouse Freezer Storage facility is located in Dothan, Alabama. This facility uses anhydrous ammonia for cold food storage. 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 storage rooms. Dothan Warehouse was established in 1980 and operates seven facilities in the Dothan area. The facility that was inspected is the only RMP-covered facility out of the seven locations. The process is regulated as program level 3. According to facility records, the facility has the capacity for a maximum of 14,000 pounds of anhydrous ammonia on site. The ammonia 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-In-Training: Bethany Terpin, EPA
Inspector-In-Training: Chetan Gala, EPA
Date of Facility Visit: March 01, 2022

Facility Identification

Name: Dothan Warehouse Freezer Storage
Street Address: 3570 Westgate Parkway
City: Dothan County: Houston State: Alabama Zip: 36303
EPA Facility ID No: 1000 0024 0562
Dun & Bradstreet (D&B) No: N/A
Latitude: 31.270691
Longitude: -85.406258

Name, address and phone of corporate parent company:
Owner/Operator: Dothan Warehouse
Mailing Address: 980 Murray Rd
City: Dothan State: Alabama Zip: 36303
Phone: (334) 793-6003

Name, title, and email of person responsible for 40 C.F.R. Part 68 implementation:
Name: Kris Benak
Title: Refrigeration Technician
Email: kris@dothanwarehouse.com

Name and title of emergency contact:
Name: Kris Benak
Title: Refrigeration Technician
Day phone: (334) 790-0685
24-hour Phone: (334) 790-0685
Email: kris@dothanwarehouse.com

Name and titles of stationary source personnel involved in site inspection (*accompanied site tours, provided documents and explanations*):
Name: Guy Woodall
Title: General Manager
Phone: (334) 661-5042
Email: guy@dothanwarehouse.com

Name: Kris Benak
Title: Refrigeration Tech.
Phone: (334) 790-0685
Email: kris@dothanwarehouse.com

Note: This is not a union facility.

Date and Program Levels of Submitted Risk Management Plan

Date of initial submission: March 29, 2019
Process as reported in RMP: Ammonia Refrigeration
Process: Ammonia Refrigeration
Process ID: 1000095917
Program Level as reported in RMP: 3
NAICS code: 42441 (General Line Grocery Merchant Wholesalers)

3.0 Observations

The inspection of the Dothan Warehouse Freezer Storage 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. EPA inspectors requested paperwork associated with the facility’s Risk Management Plan (RMPlan) . The documents were reviewed by EPA inspectors on-site and later off-site. The discussion was followed by a tour of the facility’s ammonia refrigeration system. An inspection out-brief was conducted where EPA inspectors described their observations. Observations from the RMP inspection at the Dothan Warehouse Freezer Storage 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.
 - At the time of the inspection, frost build-up was observed around piping in the engine room where valve groups were present, which could cause issues when trying to operate those valves. ANSI/IIAR 2-2014 section 5.10.1 (Condensation and Frost Control) 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.”*
2. 40 C.F.R. § 68.73(d)(2) requires inspection and testing procedures to follow recognized and generally accepted good engineering practices.

At the time of the inspection, ammonia piping associated with the condensers that are located outside on the roof had paint peeling off in certain areas, which could

lead to corrosion and pitting. ANSI/IIAR 6-2019, Chapter 11, Table 11.1 Piping Inspection, Testing, and Maintenance Tasks indicates, “*Visual inspections for indications of degradation of the protective coating (i.e., paint) should occur annually.*”

3. 40 C.F.R. § 68.81(d)(2) requires a report to be prepared at the conclusion of the investigation which includes at a minimum: Date investigation began.
 - The inspection team asked for an incident investigation report and received the document, “Incident Reporting Log Sheet.” The document did include the date of the incident and the date the investigation was completed; however, it did not include the date the investigation began. The inspection team could not determine if the investigation began within 48 hours following the incident, as required by 40 C.F.R. § 68.81(b).

Inspection Report,

Prepared by:

JORDAN NOLES Digitally signed by JORDAN NOLES
Date: 2022.04.19 09:30:22 -04'00'

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

Date

Approved by:

JASON DRESSLER Digitally signed by JASON DRESSLER
Date: 2022.04.19 11:14:55 -04'00'

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

Date