

United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report

Americold Gadsden Plant # 5148

Gadsden, Alabama

February 12, 2025

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 Gadsden Plant # 5148 facility located in Gadsden, Etowah County Alabama. This facility was selected due to its location and distance near other RMP facilities, as well as the amount of time it had been since the previous inspection. The inspection, which was conducted on February 12, 2025, 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 Gadsden Plant # 5148 (Americold Gadsden) is located in Gadsden, Etowah county Alabama. The facility uses anhydrous ammonia for refrigeration processes on site. The process is regulated as program level 3. According to facility records, the facility has a maximum of 14,500 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: Callie Sotolongo, EPA

Inspector: Justin Stark, EPA

Date of Facility Visit: February 12, 2025

Facility Identification

Name: AmeriCold Gadsden Plant # 5148
Street Address: 215 E Air Depot Rd.
City: Gadsden County: Etowah State: Alabama Zip: 35905
EPA Facility ID No: 1000 0025 1238
Dun & Bradstreet (D&B) No: 1190498
Latitude: 37.03442
Longitude: -086.28882

Name, address and phone of corporate parent company:

Owner/Operator: Americold Logistics
Mailing Address: 10 Glenlake Parkway
City: Atlanta State: Georgia Zip: 30328
Phone: (404) 502- 6802

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

Name: Sheldon Baptiste
Title: Consultant
Phone: (205) 323- 7708
Email: sheldon.baptiste@americold.com

Name and title of emergency contact:

Name: Jason Peppers
Title: Engineering Maintenance Manager
Day phone: (256) 960-7528
24-hour Phone: (256) 960- 7528
Email: jason.peppers@americold.com

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

Name: Ronny Cheek
Title: PSM Manager
Phone: (404) 502- 6802
Email: ronny.cheek@americold.com

Name: Tracy Machen
Title: General Manager
Phone: (256) 492- 1400
Email: tracy.machen@americold.com

Name: John Clower
Title: Technician
Phone: (256) 492- 5499
Email: john.clower@americold.com

Note: This is not a union facility.

Date and Program Levels of Submitted Risk Management Plan

Date of initial submission: August 20th, 1999
Date of most recent submissions: May 13, 2024
Process: Ammonia Refrigeration
Process ID: 1000 0015 9641
Program Level as reported in RMP: 3
NAICS code: 49312 (Refrigerated Warehousing and Storage)

3.0 Observations

The inspection of the Americold Gadsden 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 Gadsden 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). The following observations were made with respect to RAGAGEP:
 - At the time of the inspection, all pressure relief valve tags were expired on the seven compressor systems present in the engine room. These expiration dates were photographed and dated June of 2024, and February of 2024, with an installation date of June 2019. All tags were expired and had not been changed and needed replacement after 5 years of service.
 - The American National Standards Institute (ANSI)/International Institute of All-Natural Refrigeration 6 (IAR 6), (2019) section 13.1.1 states *All pressure relief valves (PRVs) that relieve to atmosphere shall be recertified or replaced on the 5-year time-based frequency; 13.1.1.1 The service life of the PRV shall not exceed 5 years of service after it is installed on the system.*

- At the time of the inspection, excessive ice was present on the V-3 house recirculatory vessel, preventing operational function. This buildup of ice prevents the use of shut off valves located on vessel v-3. This ice buildup appeared to have been forming for a significant amount of time based on the thickness observed, and the facility did not have plans for defrosting at the time.
 - IIAR 6 (5.6.8) requires the owner or operator to *ensure equipment and piping shall be free from excessive ice buildup. (5.6.8.1) Ice buildup shall not interfere with the operation of emergency shut-off valves.*
- At the time of the inspection, the door to the FSG shop had excessive gapping and was not tight fitting, allowing airflow into the ammonia engine room. This could visibly be seen from the light coming in through the other side of the shop door. This loose-fitting door does not meet IIAR standards, as followed by the facility.
 - IIAR 2-2014, Addendum A, Section 6.10.2 and IIAR 9-2020, Section 7.3.9.2 requires the owner or operator to *ensure that machinery room doors shall be tight fitting. IIAR 1- 2017 defines tight-fitting door as “a tightly constructed door with seals to minimize gap clearances between the entire door perimeter and its fixed frame that is intended to control the transfer of liquid, moisture, air, and vapor.”*

Inspection Report Prepared by:

CALLIE

SOTOLONGO

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Callie Sotolongo, Inspector-In-Training

South Air Enforcement Section

U.S. EPA Region 4

Date

Approved by:

TODD

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Todd Groendyke, Section Chief

South Air Enforcement Section

U.S. EPA Region 4

Date