

United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report

Crown Bakeries, LLC

Nashville, Tennessee

June 23, 2021

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 Crown Bakeries facility located in Nashville, Davidson County, Tennessee. This facility was selected for inspection because it had never been inspected under the RMP. The inspection, which was conducted on June 23, 2021, 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. 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 Crown Bakeries facility is located in Nashville, Tennessee. The facility uses anhydrous ammonia as a refrigerant to cool bread products for storage and processing. The process is regulated as program level 3. According to facility records, the facility has a maximum of 12,875 pounds of ammonia (anhydrous) 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: Jordan Noles, EPA

Inspector-In-Training: Bethany Terpin, EPA

Date of Facility Visit: June 23, 2021

Facility Identification

Name: Crown Bakeries

Street Address: 1905 Hackworth Street

City: Nashville County: Davidson State: Tennessee Zip: 37210

EPA Facility ID No: 1000 0024 5594

Dun & Bradstreet (D&B) No: N/A

Latitude: 36.137596

Longitude: -86.750830

Name, address and phone of corporate parent company:

Owner/Operator: Cold Storage Nashville

Mailing Address: 1905 Hackworth Street

City: State: Zip: Nashville, TN

Phone: (615) 454-2213

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

Name: Thomas Evert

Title: Engineering Manager

Phone: (615) 454-2213

Email: tevert@crownbakeries.com

Name and title of emergency contact:

Name: Thomas Evert

Title: Engineering Manager

Day phone: (615) 454-2213

24-hour Phone: (773) 501-7141

Email: tevert@crownbakeries.com

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

Name: Thomas Evert

Title: Engineering Manager

Phone: (615) 454-2213

Email: tevert@crownbakeries.com

Name: Todd Musterait

Title: Chief Growth Officer

Phone: (716) 697-0623

Email: Todd.Musterait@apexcoss.com

Name: Donnie Perry

Title: PSM Coordinator

Name: Pete Kalmon

Title: PSM Consultant, Summit Refrigeration Group

Note: This is not a union facility.

Date and Program Levels of Submitted Risk Management Plan

Date of initial submission: November 9, 2020

Date of most recent submissions: November 9, 2020

Process as reported in RMP: Ammonia Refrigeration

Process: Ammonia Refrigeration

Process ID: 1000112818

Program Level as reported in RMP: 3

NAICS code: 31181 (Bread and Bakery Product Manufacturing)

3.0 Observations

The inspection of the Crown Bakeries 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 from the facility’s Risk Management Plan, which were provided on a USB drive for further review off-site. The discussion was followed by a tour of the facility’s ammonia refrigeration process areas. An inspection out-brief was conducted where EPA inspectors described their observations. Observations from the RMP inspection at the Crown Bakeries facility are discussed below:

1. 40 C.F.R. § 68.71(a) requires that each employee operating a process has been trained in an overview of the process and in the operating procedures. 40 C.F.R. § 68.71(c) requires that the owner or operator prepare a record which contains documentation of each employee’s training completion and competency.
 - At the time of the inspection, Crown Bakeries provided employee training guidelines, but did not provide an established training program for employees operating the covered process. Crown Bakeries did not have a record of documentation of employee training completion or competency.
2. 40 C.F.R. § 68.65(d)(2) requires documentation that equipment complies with recognized and generally accepted good engineering practices.
 - At the time of the inspection, cardboard boxes, drums, buckets, and other combustible materials were found in the machinery room. ANSI/IIAR 2-2014 section 6.4 states, *“Combustible materials or flammable liquids shall not be stored in machinery rooms outside of approved fire-rated storage containers.”*
 - At the time of the inspection, some ammonia pipes in the engine room were not labeled with contents, physical state, and direction of flow. ANSI/IIAR 2-2014 section 5.14.5 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.*
5. *Direction of flow.”*

“The marking system shall either be one established by a recognized model code or standard or one described and documented by the facility owner.”

3. 40 C.F.R. § 68.75(a) requires established written procedures to manage changes to process chemicals, technology, equipment, and procedures that affect a covered process.
 - At the time of the inspection, Crown Bakeries did not have any written procedures to manage changes that affect the covered process.
4. 40 C.F.R. § 68.75(c) requires that employees whose job tasks will be affected by a change in the process shall be trained in the change prior to start-up of the process.
 - At the time of the inspection, there was no documented training for employees whose job tasks were affected by the facility expansion in November 2020.
5. 40 C.F.R. § 68.77(a) requires a pre-startup safety review for modified stationary sources when the modification is significant enough to require a change in the process safety information. Pursuant to 40 C.F.R. § 68.77(b)(4), the safety review must confirm that training of each employee involved in operating the process is completed.
 - At the time of the inspection, Crown Bakeries did not produce records of training prior to the facility expansion in November 2020.

Inspection Report,

Prepared by:

Noles, Jordan

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Jordan
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Bethany Terpin, Inspector-In-Training
North Air Enforcement Section
U.S. EPA Region 4

Date

**Noles,
Jordan**

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

Date

Approved by:

**JASON
DRESSLER**

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

Date