United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report

General Mills Yoplait

Murfreesboro, Tennessee
December 15, 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 an ammonia refrigeration process at the General Mills Yoplait facility located in Murfreesboro, Rutherford County, Tennessee. This facility was selected for inspection because it hasn't been inspected within the last five years under the RMP. The inspection, which was conducted on December 15, 2021, 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 by email for review off-site. This report will provide a background of the facility and a listing of observations.

2.0 Background

The General Mills Yoplait facility is located in Murfreesboro, Tennessee. This facility uses anhydrous ammonia for cold food storage. The process is regulated as program level 3. According to facility records, the facility can have a maximum of 18,250 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
Date of Facility Visit: December 15, 2021

Facility Identification

Name: General Mills Yoplait
Street Address: 2695 General Mills Way
City: Murfreesboro County: Rutherford State: Tennessee Zip: 37127
EPA Facility ID No: 1000 0019 1062
Dun & Bradstreet (D&B) No: 1326438
Latitude: 35.798333
Longitude: -086.391667

Name, address and phone of corporate parent company:
Owner/Operator: General Mills Operations, LLC
Mailing Address: 1 General Mills Blvd, MN
City: Golden Valley State: Minnesota Zip: 55426
Phone: (260) 490-3000

Name, title, and email of person responsible for 40 C.F.R. Part 68 implementation:
Name: James D Tincher
Title: Plant Manager
Email: david.tincher@genmills.com

Name and title of emergency contact:
Name: Josh Wagner
Title: Safety Manager
Day phone: (615) 225-1454
24-hour Phone: (615) 715-7307
Email: joshua.wagner@genmills.com

Name and titles of stationary source personnel involved in site inspection *(accompanied site tours, provided documents and explanations):*
Name: Aaron Stewart
Title: Sr. Facilities Engineer
Phone: (615) 225-1451
Email: aaron.stewart@genmills.com

Name: John DeCuir
Title: Senior Project Manager
Phone: (615) 225-1225
Email: john.decuir@genmills.com

Name: Mark Holland
Title: PSM Planner
Phone: (615) 225-1901
Email: mark.holland@genmills.com

Name: Matt Martin
Title: Utility Foreman
Phone: (931) 703-1042
Email: matt.martin@genmills.com

Name: Josh Wagner
Title: HSE Manager
Phone: (615) 715-7307
Email: joshua.wagner@genmills.com

Note: This is not a union facility.

Date and Program Levels of Submitted Risk Management Plan

Date of initial submission: March 14, 2005
Date of most recent submissions: July 29, 2020
Process as reported in RMP: Ammonia Refrigeration
Process: Ammonia Refrigeration
Process ID: 1000110211
Program Level as reported in RMP: 3
NAICS code: 31151 (Dairy Product (except Frozen) Manufacturing)

3.0 Observations

The inspection of the General Mills Yoplait 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) to be sent by email due to risks associated with the COVID-19 pandemic. The documents were later reviewed by EPA inspectors off-site. At the time of the drafting of this report, some documents may still be requested for further investigation. 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 General Mills Yoplait 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, 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, the inspection team observed damaged and missing insulation on an ammonia pipe associated with one of the compressors in the engine room. ANSI/IIAR-6, Standard for Inspection, Testing, and Maintenance of Closed-Circuit Ammonia Refrigeration Systems states, "*11.1.2 For insulated piping, where insulation is removed, partly or completely, for visual inspection or remaining wall thickness measurement(s), a protective coating shall be applied to the exposed metal surface and insulation shall be replaced in accordance with the manufacturer's installation instructions after arresting any identified exposed piping metal surface corrosion.*"

2. 40 C.F.R. § 68.67(e) requires the owner or operator to establish a system to promptly address the team's findings and recommendations; assure that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete actions as soon as possible; develop a written schedule of when these actions are to be completed; and communicate the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions.

    - The facility provided the inspection team with the 2019 Process Hazard Analysis revalidation with a log to document action items. There were six action items listed on the log; however, the response section of the log was not filled out. The response section includes columns for actions, who the actions are assigned to, the due dates for each action, the date the action was completed, and verification; however, each column was left blank.

3. 40 C.F.R. § 68.73(d)(2) requires the inspection and testing procedures to follow recognized and generally accepted good engineering practices.

    - The facility provided the inspection team with the log used for pressure safety valve (PSV) replacement. There were six PSVs that had an expiration date of August 2021. According to the facility's own log, the PSVs should have been replaced in August of 2021. According to Table 13.1 in ANSI/IIAR 6 - Standard for Inspection, Testing, and Maintenance of Closed-Circuit Ammonia Refrigeration Systems, pressure relief valves must be changed every five years.

4. 40 C.F.R. § 68.79(d) requires the owner or operator to promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected.

    - The facility produced the last two compliance audits that were conducted in 2016 and 2019. The 2019 compliance audit has 15 incomplete items that have target completion dates in 2020.

5. 40 C.F.R. § 68.93(a) requires coordination with the local fire department to 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.

- When asked by the inspection team, the facility could not produce documentation that they have been coordinating annually with the local fire department.

Inspection Report,

Prepared by:

JORDAN NOLES Digitally signed by JORDAN NOLES
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Jordan Noles, Inspector Date
North Air Enforcement Section
U.S. EPA Region 4

Approved by:

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Jason Dressler, Section Chief Date
North Air Enforcement Section
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