

United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report

Interstate Warehousing

Murfreesboro, Tennessee

December 14, 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 Interstate Warehousing 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 14, 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 International Warehousing 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 27,000 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

Date of Facility Visit: December 14, 2021

Facility Identification

Name: Interstate Warehousing
Street Address: 2125 Joe B. Jackson Parkway
City: Murfreesboro County: Rutherford State: Tennessee Zip: 37127
EPA Facility ID No: 1000 0019 4951
Dun & Bradstreet (D&B) No: 800635091
Latitude: 35.775900
Longitude: -086.384600

Name, address and phone of corporate parent company:
Owner/Operator: Tippmann Group
Mailing Address: 9009 Coldwater Road
City: Fort Wayne State: Indiana Zip: 46825
Phone: (260) 490-3000

Name, title, and email of person responsible for 40 C.F.R. Part 68 implementation:
Name: Grant Chapman
Title: Facilities Engineer
Email: gchapman@tippmanngroup.com

Name and title of emergency contact:
Name: Rich Hale
Title: Maintenance Manager
Day phone: (615) 904-3000
24-hour Phone: (615) 542-3388
Email: rhale@tippmanngroup.com

Name and titles of stationary source personnel involved in site inspection (*accompanied site tours, provided documents and explanations*):
Name: Rich Hale
Title: Maintenance Manager
Phone: (615) 542-3388
Email: rhale@tippmanngroup.com

Name: Grant Chapman
Title: Facilities Engineer
Phone: (317) 752-8017
Email: gchapman@tippmanngroup.com

Name: Brett Livingston
Title: Corporate Safety Director
Phone: (317) 504-6523
Email: blivingston@tippmanngroup.com

Name: Justin Haynes
Title: Safety Manager
Phone: (615) 663-9497
Email: jhaynes@tippmanngroup.com

Note: This is not a union facility.

Date and Program Levels of Submitted Risk Management Plan

Date of initial submission: April 12, 2006
Date of most recent submissions: March 31, 2020
Process as reported in RMP: Ammonia Refrigeration
Process: Ammonia Refrigeration
Process ID: 1000107874
Program Level as reported in RMP: 3
NAICS code: 49312 (Refrigerated Warehousing and Storage)

3.0 Observations

The inspection of the Interstate Warehousing 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 Interstate Warehousing 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, the inspection team observed that none of the doors had panic-type hardware exiting the engine room. ANSI/IIAR 2-2014 section 6.10.2 (Door Features) states, “*Machinery room doors shall be self-closing and tight fitting. Doors that are part of the means of egress shall be equipped with panic hardware and shall be side hinged to swing in the direction of egress for occupants leaving the machinery room.*”
 - At the time of the inspection, the inspection team observed one door entering the engine room had the wrong NFPA placard. The placard displayed a “1” for the degree of flammability; the correct degree for flammability for indoor ammonia refrigeration equipment is “3.” ANSI/IIAR 2-2014 section 5.14.2 (NFPA 704 Placards) states, “*Buildings and facilities with refrigeration systems shall be*

provided with placards in accordance with NFPA 704. For equipment located outdoors, the placard shall display the following degrees of hazard: Health-3, Flammability-1, Instability-0. For equipment located indoors, the placard shall display the following degrees of hazard: Health-3, Flammability-3, Instability-0."

- 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.*"

Inspection Report,

Prepared by:

JORDAN NOLES

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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