



REGION 4

ATLANTA, GA 30303

SENT VIA ELECTRONIC MAIL

Tracy Hawkins
Sr. Director
Bessemer Fresh DC
Dollar General Corporation
4101 Lakeshore Parkway
Bessemer, Alabama 35022
trhawkin@dollargeneral.com

Dear Tracy Hawkins:

Enclosed is a copy of the final Inspection Report (Enclosure A) generated by the Environmental Protection Agency Region 4 Air Enforcement Branch for the June 25, 2024, partial compliance inspection of the inspection of the Bessemer Fresh DC - Dollar General facility, located at 4101 Lakeshore Parkway in Bessemer, Alabama.

The EPA previously sent a copy of the draft inspection report in an email on July 16, 2024, allowing Bessemer Fresh DC - Dollar General, to make any comments regarding the report and to claim any information contained in the report as confidential business information (CBI). In an email dated July 22, 2024, Bessemer Fresh DC - Dollar General notified EPA that no comments were being made and that no information was being claimed as CBI.

Should you have any questions regarding this inspection report, please contact me at (404) 562-9198, or by email at warrilow.phyllis@epa.gov.

Sincerely,

**PHYLLIS
WARRILOW**

Phyllis Warrilow, PE
Environmental Engineer
South Air Enforcement Section

Digitally signed by PHYLLIS
WARRILOW
Date: 2024.08.14 16:32:01
-04'00'

Enclosure

ENCLOSURE A
INSPECTION REPORT

**United States Environmental Protection Agency (EPA) Region 4
Air Enforcement Branch
Inspection Report**

I. GENERAL INFORMATION

Facility Name: Bessemer Fresh DC Dollar General

Location (Address): 4101 Lakeshore Parkway, Bessemer, Alabama 35022

Inspection Date: June 25, 2024

Type of Inspection (Full or Partial Compliance Evaluation):

Partial Compliance Evaluation focused on the Clean Air Act (CAA) 112 (r)(1) General Duty Clause requirements of the ammonia refrigeration system.

ICIS-Air Number:

EPA Region 4 Investigator(s)/Inspector(s):

1. Phyllis Warrilow, Environmental Engineer

State/Local Investigator(s)/Inspector(s):

Person(s) Contacted at Facility (Name and Title):

1. Tracy Hawkins, Sr. Director
2. Cedric Brown, Sr. Maintenance Manager
3. Steven Ezell, Maintenance Supervisor

Report Prepared by: Phyllis Warrilow

II. FACILITY INFORMATION

A. Facility and Permit Information

Facility and Permit Information	Comments
1. Type of facility (e.g., chemical plant, refinery, cement manufacturer, etc.).	NAICS 493120 – Refrigerated Warehouse and Storage.
2. Air permit number(s) and type of permit (e.g., Title V, PSD, Synthetic Minor, etc.).	N/A
3. Air permit issuance date.	N/A
4. Air permit expiration date.	N/A
5. Facility classification (Major, Synthetic Minor/Conditional Major, Minor).	N/A
6. Major source pollutants (if applicable).	N/A
7. Applicable regulations (e.g., State Implementation Plan, MACT Subpart FFFF, NSPS Subpart EEEE, etc.).	Clean Air Act § 112(r)(1)
8. Types of air emission points (e.g., tanks, process vents, boilers, etc.).	Ammonia refrigeration system
9. Types of air pollution control equipment (e.g., baghouse, scrubber, afterburner, etc.).	N/A

B. Process Description

Bessemer Fresh DC Dollar General (Facility) located in Bessemer, Alabama is classified under NAICS Code 493120, refrigerated warehousing and storage. The facility is owned by Dollar

General Corporation. The Bessemer location was commissioned in 2012 and is comprised of a large one million square foot dry storage building which includes a freezer of approximately 950 square feet. Ice packs are kept in the freezer for later use in shipping containers that transport candy. The ice packs are needed to keep candy from melting in tractor trailers while in transit. The facility's ammonia refrigeration system has the capacity to hold approximately 7,400 lbs of ammonia, however at the time of the inspection the facility had 6,900 lbs of ammonia on site. The facility operates on 5-day week, 12 hour per day schedule all year except for Christmas and Thanksgiving. The Bessemer location employs 675 workers.

III. INSPECTION ACTIVITIES

Activity	Yes No NA	Comments
Opening Meeting		
1. Date and time entered the facility.	Y	The EPA Region 4 (R4) inspector arrived at the Facility on June 25, 2024, at approximately 3:10 PM EDT
2. Credentials presented to facility personnel (include name and title).	Y	The EPA Inspector presented credentials to: Tracy Hawkins, Sr. Director, Cedric Brown, Sr. Maintenance Manager, and Steven Ezell, Maintenance Supervisor

Activity	Yes No NA	Comments
3. Conducted an opening meeting to explain the purpose and objectives of the inspection.	Y	The opening conference began at 3:25 PM EDT during which the purpose and objectives of the inspection were explained. The opening conference was led by EPA inspector Phyllis Warrilow as well as members of Dollar General management. The inspector explained that they were conducting a Clean Air Act inspection specifically focused on the General Duty Clause requirements of the ammonia refrigerant system.
4. Discussed safety issues.	Y	The inspector discussed Facility-specific safety and emergency procedures. Ear plugs, safety glasses, coats, gloves, shoe, and hair coverings were provided as needed.

Activity	Yes No NA	Comments
5. Discussed which records to be reviewed.	Y	The EPA inspector requested to review the following records: - Piping and instrumentation diagrams for the ammonia refrigeration system - Hazard assessment for the ammonia refrigeration system - Standard operating procedures relating to the ammonia refrigeration system - Documentation of the preventive maintenance/mechanical integrity program for the ammonia refrigeration system - Records of the most recent calibration or testing of any ammonia sensors/alarms - Pressure Relief Valve recertifications - Facility's emergency response plan or emergency action plan - Documentation of the total amount of ammonia in the refrigeration system
6. Discussed the facility walk-through and the areas to be observed in the facility.	Y	
7. Discussed facility policy regarding photographs or video (if applicable).	N/A	
8. Discussed the use of the infrared camera, TVA, PID, and any other equipment.	N/A	
9. Discussed CBI.	Y	EPA inspectors indicated that any documents claimed to be Confidential Business Information (CBI) would be treated in accordance with regulations.

Records Reviewed at the Facility 10. The types of records reviewed, and the time period reviewed.	Y	EPA inspectors requested the following records during the inspection: - Documentation of the total amount of ammonia in the refrigeration system. -Piping and instrumentation diagrams for the ammonia refrigeration system. -Documentation of the preventive maintenance/mechanical integrity program for the ammonia refrigeration system. -Standard operating procedures relating to the ammonia refrigeration system -Conformation of the most recent calibration or testing of any ammonia sensors/alarms, - Records of Pressure Relief Valve recertifications. (Required every 5 years), -Facility's emergency response plan or emergency action plan. Records of the Hazard assessment for the ammonia refrigeration system were not presented to EPA as the facility uses a contractor to maintain the records for the facility plus key personnel were not present at the time of the inspection.
--	----------	--

Activity	Yes No NA	Comments
Facility Walk-Through Observations		
11. The process equipment observed and the associated operational rate observed (e.g., Furnace 1 production rate was 5 lbs/hr on 1/1/15, at 2:00 pm – permit requires max rate at 6 lbs/hr). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	Y	The facility has three compressors. Compressor Number 1,2 and 3 were operating at time of the inspection. Compressor Number 1 was observed to be operating at a discharge pressure of 181 PSIG and a suction pressure of 44.7 PSIG at approximately 4:35 PM on June 25, 2024. Compressor Number 2 was observed to be operating at a discharge pressure of 188.1 PSIG and a suction pressure of 51.1 PSIG at approximately 4:35 PM on June 25, 2024. Compressor Number 3 was observed to be operating at a discharge pressure of 184.4 PSIG and a suction pressure of 2.4 PSIG at approximately 4:35 PM on June 25, 2024.

Activity	Yes No NA	Comments
12. The type of process parametric monitoring observed, and the associated value observed (e.g., Furnace 1 flux injection rate was 200 lbs/batch at 1/1/15, at 2:00 pm – permit requires max rate at 225 lbs/batch). Provide the date and time the information was recorded by the inspector. 13. Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
14. If process equipment or parametric monitoring equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	

Activity	Yes No NA	Comments
15. The type of air pollution control equipment, the process equipment it is controlling, and the associated parametric monitoring value observed (e.g., baghouse pressure drop, temperature, scrubber flow rate, etc.). (For example - RTO 1 controlling furnace 1, 1,500 degrees F on 1/1/15, at 2:00 pm – permit requires 1,400 degree F or higher). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
16. Continuous emissions monitoring devices and values observed. (e.g., CEMS, COMs, etc.). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	As part of the walk through at approximately 4:45 pm on June 25, 2024, the EPA inspector observed ammonia detectors in the machine room and throughout the facility. The facility operates 4 ammonia detectors. The last calibration of the ammonia sensors occurred on 2/8/2024. The pressure safety relief valves in the machine room were current and will expire in March of 2025.

Activity	Yes No NA	Comments
17. If air pollution control equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	
18. Capture and collection system (enclosures and hoods) observations, if applicable (e.g., the magnitude and duration of emission escaping capture from the hood).	N/A	
19. Ductwork transferring the emissions to the air pollution control device observations, if applicable (e.g., the magnitude and duration of emission escaping from the ductwork, holes or deterioration in ductwork, no deterioration observed, etc.).	N/A	
20. Any existing unpermitted emission points, new unpermitted emission points, or non-permitted construction activities observed. (if yes, describe in the comments field).	N/A	

Activity	Yes No NA	Comments
21. Were any visible emissions observed? (if yes, identify the location and equipment).	N/A	
22. Was a Method 9 reading performed? (if yes, identify the location and equipment).	N/A	
23. Was the cause of the visible emissions investigated and the information documented?	N/A	
24. Was a Method 22 performed for visible emissions? (if yes, identify the location and equipment).	N/A	
25. Identify the cause of the visible emissions as explained by facility personnel, if applicable.	N/A	
26. Was the infrared camera used? If so, attach the video log (which includes the equipment ID, and the date and time the video was recorded) and videos to this report.	N/A	

Activity	Yes No NA	Comments
27. Was the TVA used? If so, identify the equipment monitored and the results. Provide the date and time the information was recorded by the inspector. Include actual instrument readings for each piece of equipment monitored above the leak definition and/or where the infrared camera identified a release. An attachment may be used for a large amount of information.	N	
28. Was the PID used? If so, identify how the PID was used and the results. Provide the date and time the information was recorded by the inspector. An attachment may be used for a large amount of information.	N/A	
Closing Meeting		
29. Conducted a closing meeting.	Y	The closing meeting was conducted starting at 5:37 PM on June 25, 2024. Attendees were the same as were present for the opening meeting.
30. Summarize any additional information needed, if applicable?	N	Facility had all requested documents except for the Process Hazard Analysis.

Activity	Yes No NA	Comments
31. Accept a declaration of CBI, if applicable?	N/A	
32. Discussed observations.	N	The facility's mechanical equipment and mechanical integrity program was implemented by maintenance personnel. Some records were computerized and easily retrievable. The Facility was able to verify the following records for the ammonia refrigerant system: - Documentation of the total amount of ammonia in the refrigeration system - Pressure safety valve certifications. - Dates of the most recent calibration or testing of any ammonia sensors/alarms. - Process & Instrumentation Diagram - Preventative Maintenance records - Facility Emergency Response Plan Mechanical Integrity and Preventative maintenance were kept on schedule by maintenance personnel and ammonia refrigeration contractors. Process Hazard Analysis was to be retrieved from the facility's ammonia refrigeration contractor.

Activity	Yes No NA	Comments
33. Discussed next steps, if applicable?	Y	A final inspection report from EPA Region 4 will be sent to the company within a 70-day timeframe. Document requests were discussed.
34. Date and time inspection concluded.		On June 25, 2024, at approximately 6:07 PM the Region 4 inspector left the Facility and concluded the inspection.
Miscellaneous		
34. Include any additional observations, if applicable.	N/A	Process hazard assessment for the ammonia refrigeration system is to be received from the facility as acknowledged above.

EPA Investigator/Inspector Signature: PHYLLIS WARRILOW Digitally signed by PHYLLIS WARRILOW
Date: 2024.08.15 08:21:50 -04'00'

EPA Supervisor Signature & Title TODD GROENDYKE Digitally signed by TODD GROENDYKE
Date: 2024.08.15 08:39:05 -04'00'

Date Report Finalized: _____

APPENDICES AND ATTACHMENTS

Appendix A: Document Receipt Log

No documents were obtained from Facility representatives during the on-site inspection.