

United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report

Monogram Assembled Foods

Dickson, Tennessee

July 28, 2022

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 Monogram Assembled Foods facility located in Dickson, Dickson County, Tennessee. This facility was selected for inspection because it had not been inspected since change of ownership under the RMP. The inspection, which was conducted on July 28, 2022, 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 Monogram Assembled Foods facility is located in Dickson, Tennessee. The facility uses anhydrous ammonia as a refrigerant to manufacture packaged frozen foods. The process is regulated as program level 3. According to facility records, the facility has a maximum of 27,099 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: Bethany Terpin, EPA

Inspector: Jordan Noles, EPA

Inspector-In-Training: Chet Gala, EPA

Date of Facility Visit: July 28, 2022

Facility Identification

Name: Monogram Assembled Foods
Street Address: 1655 Old Columbia Road
City: Dickson County: Dickson State: Tennessee Zip: 37055
EPA Facility ID No: 1000 0019 4452
Dun & Bradstreet (D&B) No: NA
Latitude: 36.047500
Longitude: -087.345278

Name, address and phone of corporate parent company:
Owner/Operator: Monogram Food Solutions
Mailing Address: 530 Oak Court Drive Suite 400
City: Memphis State: Tennessee Zip: 38117
Phone: 901-685-7167

Name, title, and email of person responsible for 40 C.F.R. Part 68 implementation:
Name: Willie Gordon
Title: Plant Manager
Phone: (803) 439-6816
Email: wgordon@monogramfoods.com

Name and title of emergency contact:
Name: Evan Ingersoll
Title: EHS Manager
Day phone: (615) 229-1841
24-hour Phone: (724) 552-7622
Email: eingersoll@monogramfoods.com

Name and titles of stationary source personnel involved in site inspection (*accompanied site tours, provided documents and explanations*):
Name: Don Morgan
Title: Maintenance Manager
Phone: (731) 418-9003
Email: dmorgan@monogramfoods.com

Name: Lynn Buldhaupt
Title: Director of Environmental Compliance
Phone: (507) 227-5304
Email: lbuldhaupt@monogramfoods.com

Name: Evan Ingersoll
Title: EHS Manager
Phone: (724) 552-7622
Email: eingersoll@monogramfoods.com

Name: Randy Horseman
Title: PSM
Phone: (615) 289-2792
Email: rhorseman@monogramfoods.com

Name: Kent Munich
Title: HR Manager
Phone: (615) 864-1469
Email: kmunich@monogramfoods.com

Name: Willie Gordon
Title: Plant Manager
Phone: (803) 439-6816
Email: wgordon@monogramfoods.com

Name: Tom Jenson
Title: QA/FS Manager
Phone: (763) 732-2958
Email: tjenson@monogramfoods.com

Name: Deborah Spradlin
Title: PSM Consultant
Phone: (713) 818-7751
Email: dspradlin@hcgassoc.com

Note: This is not a union facility.

Date and Program Levels of Submitted Risk Management Plan

Date of initial submission: March 22, 2022
Date of most recent submissions: March 22, 2022
Process: Refrigeration System
Process ID: 1000124286
Program Level as reported in RMP: 3
NAICS code: 311991 (Perishable Prepared Food Manufacturing)

3.0 Observations

The inspection of the Monogram Assembled Foods 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. The discussion was followed by a tour of the facility’s ammonia refrigeration process areas. EPA inspectors then requested paperwork associated with the facility’s Risk Management Plan (RMPlan). The documents were reviewed by EPA inspectors on-site and provided for review off-site. An

inspection out-brief was conducted where EPA inspectors described their observations. Observations from the RMP inspection at the Monogram Assembled Foods 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, there were four pressure relief valves (Valves # OP-1-5, OP-2-5, C-1-9, and C-1-10) that were required to be replaced in April 2021, but were still in service.

Section 13.1.1 of ANSI/IIAR 6 (2019) states, “*All pressure relief valves (PRVs) that relieve to atmosphere shall be recertified or replaced on the 5-year time-based frequency.*”

Section 13.1.1.1 of ANSI/IIAR 6 (2019) states, “*The service life of the PRV shall not exceed 5 years of service after it is installed on the system.*”

Inspection Report,

Prepared by:

BETHANY TERPIN

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Date: 2022.09.19 10:23:40 -04'00'

Bethany Terpin, Inspector
North Air Enforcement Section
U.S. EPA Region 4

Approved by:

JASON DRESSLER

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Jason Dressler, Section Chief
North Air Enforcement Section
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