United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report

Pilgrim's Pride
Guntersville, Alabama
May 17, 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 an ammonia refrigeration process at the Pilgrim's Pride facility located in Guntersville, Marshall County, Alabama. This facility was selected for inspection because it has never been inspected under the RMP. The inspection, which was conducted on May 17, 2022, 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 for review. This report will provide a background of the facility and a listing of observations.

2.0 Background

The Pilgrim's Pride facility is located in Guntersville, Alabama. This facility uses anhydrous ammonia for cold food storage. The refrigeration process, consisting of piping, valves, and equipment, cycles ammonia through various physical states (high pressure liquid, low pressure liquid, low pressure vapor, high pressure vapor, then back to high pressure liquid) in order to provide refrigeration for cold storage rooms. Pilgrim's Pride is a subsidiary of JBS, a Brazilian company that processes and stores meat products. The U.S. headquarters for Pilgrim's Pride is located in Greeley, Colorado. The process is regulated as program level 3. According to facility records, the facility has the capacity for a maximum of 50,823 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: Chetan Gala, EPA
Date of Facility Visit: May 17, 2022

Facility Identification

Name: Pilgrim's Pride - Guntersville Processing Plant
Street Address: 3500 Lake Guntersville Park Dr.
City: Guntersville County: Marshall State: Alabama Zip: 35976
EPA Facility ID No: 1000 0010 3693
Dun & Bradstreet (D&B) No: 615250651
Latitude: 34.347025
Longitude: -086.281319

Name, address and phone of corporate parent company:
Owner/Operator: JBS Foods USA
Mailing Address: 1770 Promontory Circle
City: Greeley State: Colorado Zip: 80631
Phone: (970) 506-8000

Name, title, and email of person responsible for 40 C.F.R. Part 68 implementation:
Name: Jon Marten
Title: Senior Project Engineer
Email: jon.marten@pilgrims.com

Name and title of emergency contact:
Name: Matt Lackey
Title: Refrigeration Technician
Day phone: (256) 571-0252
24-hour Phone: (256) 738-8887
Email: matt.lackey@pilgrims.com

Name and titles of stationary source personnel involved in site inspection *(accompanied site tours, provided documents and explanations):*
Name: Matt Lackey
Title: Refrigeration Manager
Phone: (256) 571-0252
Email: matt.lackey@pilgrims.com

Name: William Horton
Title: Refrigeration PSM
Phone: (256) 762-6707
Email: william.horton@pilgrims.com

Name: Jamie Hancock
Title: PSM Coordinator
Phone: (256) 571-0250
Email: jamie.hancock@pilgrims.com

Name: Clint Stewart
Title: Environmental Manager
Phone: (256) 571-0225
Email: clint.stewart@pilgrims.com

Name: Melissa Smith
Title: Complex Safety Manager
Phone: (256) 571-9878
Email: melissa.smith@pilgrims.com

Name: Halie Orr
Title: Case Ready East Safety Director
Phone: (256) 572-6235
Email: halie.orr@pilgrims.com

Name: Cliff Rule
Title: Complex Manager
Phone: (256) 571-0264
Email: cliff.rule@pilgrims.com

Note: This is not a union facility.

<u>Date and Program Levels of Submitted Risk Management Plan</u>

Date of initial submission: May 16, 2008
Date of most recent submission: December 10, 2019
Process as reported in RMP: Ammonia Refrigeration
Process: Ammonia Refrigeration
Process ID: 1000104730
Program Level as reported in RMP: 3
NAICS code: 42441 (General Line Grocery Merchant Wholesalers)

3.0 Observations

The inspection of the Pilgrim's Pride 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). The documents were reviewed by EPA inspectors on-site and later off-site. 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 Pilgrim's Pride 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, frost build-up was observed around piping and equipment in the engine room where valve groups were present, which could cause issues when trying to operate those valves. There was also excessive ice build-up on equipment associated with some evaporators. 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."*

      ANSI/IIAR 6 (2019) section 5.6.8 states, "*Equipment and piping shall be kept free from excessive ice buildup.*
        1. Ice buildup shall not interfere with the operation of emergency shut-off valves.
        2. Ice accumulation shall not be permitted to deflect or bend pipes, displace components, or negatively impact the system's structural integrity."

    - At the time of the inspection, some pipes on the roof had missing labels or labels that were faded and/or peeling off. ANSI/IIAR 2-2014 section 5.14.6 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; and
        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."

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

    - At the time of the inspection, a valve group associated with a condenser (EC-2) that is located outside on the roof had signs of rust. ANSI/IIAR 6-2019 section 11.1.1.2 states, *"Where pitting, surface damage, general corrosion, or a combination thereof, has not materially reduced the remaining pipe wall thickness, the piping metal surface shall be cleaned and recoated to arrest further deterioration."*

    - At the time of the inspection, there was moisture and mold around the sight glasses on a pressure vessel on the roof. The metal surfaces of the sight glasses were also rusted and showed slight signs of corrosion. ANSI/IIAR 6-2019, Table 10.1 indicates the metal surfaces of the sight glass should be visually inspected annually.

3. 40 C.F.R. § 68.87(b)(5) requires the owner or operator to periodically evaluate the performance of the contract owner or operator in fulfilling their obligations as specified in 40 C.F.R. § 68.87(c).

    - When asked how contract employees are evaluated, facility representatives supplied the inspection team with a document titled "Safety Audit Sheet." The document is a checklist that allows the facility to evaluate each contract employee; however, the document given to the inspection team didn't identify which employee is being evaluated.

Inspection Report,

Prepared by:

JORDAN NOLES Digitally signed by JORDAN NOLES
Date: 2022.07.06 13:51:19 -04'00'

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

Approved by:

JASON DRESSLER Digitally signed by JASON DRESSLER
Date: 2022.07.06 14:40:01 -04'00'

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