

**U.S. Environmental Protection Agency Region 4**  
**61 Forsyth Street Atlanta, GA 30303**  
**Emergency Planning and Community Right-to-Know Act (EPCRA) Inspection Report**

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Company Name FW Logistics SIC/NAICS 493110  
Lead Inspector Name Bethany Terpin Inspection Date 10/26/2022  
Inspection Team Members Jordan Noles

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**1. Record names and titles of the facility representatives participating in the inspection.**

Name/Title Michael Cusumano/ VP of Compliance Phone: (314) 520-5039

**2. Obtain exact name and address of the facility being inspected, as well as any Parent Company information.**

Facility Name: FW Memphis Cold Facility  
Address: 1100 East Parkway South, Memphis, Tennessee 38114  
County: Shelby  
Owner/Operator/Parent Company (Name, Address, Phone): FW Logistics  
901-685-7167  
How long owned/operated, recent sale of facility (date)? N/A

**3. Obtain/review facility description.**

- a. Officers' names and titles: Mark Cusumano/Owner and Michael Cusumano/ VP of Compliance
- b. Incorporation date and location: Building built in 1953, ammonia system added in 2018
- c. Other facilities owned by the company: yes
- d. Number of employees: 25
- e. Annual Corporate Sales: N/A
- f. Process Description and Process Diagrams: FW Memphis Cold Facility is a facility that uses anhydrous ammonia for cold storage purposes.
- g. Jurisdictional Fire Department: Memphis Fire Station 16

#### 4. Compliance Review by Statute:

##### Section 312

|                                                                            |          |          |     |
|----------------------------------------------------------------------------|----------|----------|-----|
| a. Obtained chemical inventory list                                        | <u>Y</u> | N        | N/A |
| b. View purchase records (where applicable)                                | <u>Y</u> | N        | N/A |
| c. Tier II reports to SERC, LEPC, fire dept (Haz. Chem $\geq$ 10,000 lbs)? | Y        | <u>N</u> | N/A |
| d. Tier II reports to SERC, LEPC, fire dept (EHSs $\geq$ 500 lbs or TPQ)?  | Y        | <u>N</u> | N/A |
| e. Reviewed documentation of maximum daily amounts stored?                 | <u>Y</u> | N        | N/A |
| f. Reviewed MSDSs?                                                         | <u>Y</u> | N        | N/A |
| g. Reviewed documentation of submissions?                                  | Y        | <u>N</u> | N/A |
| h. Has each report from the past 3 years been submitted by March 1?        | Y        | <u>N</u> | N/A |

##### Section 313

|                                                                                                                                 |   |   |            |
|---------------------------------------------------------------------------------------------------------------------------------|---|---|------------|
| i. Form R/A to State and EPA for Toxic Chemicals:<br>Manufactured, Processed $\geq$ 25,000lbs, Otherwise Used $\geq$ 10,000 lbs | Y | N | <u>N/A</u> |
| j. Obtained list of 313 chemicals MPOU at the facility                                                                          | Y | N | <u>N/A</u> |
| k. Obtained documentation of submissions?                                                                                       | Y | N | <u>N/A</u> |
| l. Has each report from the past 3 years been submitted by July 1?                                                              | Y | N | <u>N/A</u> |

**Additional Observations:** Facility representatives had not filed under EPCRA 312 for the filing years of 2019, 2020, and 2021. The facility did file a Tier II form for EPCRA 312 in May of 2022, two months after the deadline of March 1<sup>st</sup>.

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Report Prepared By:

Name (Printed): Jordan Noles

Title: Inspector

Signature: **JORDAN NOLES** Digitally signed by JORDAN NOLES  
Date: 2023.01.04 12:39:24 -05'00'

Report Authorized By:

Name (Printed): Jason Dressler

Title: Chief, North Air Enforcement Section

Signature: **JASON DRESSLER** Digitally signed by JASON  
DRESSLER  
Date: 2023.01.04 13:21:46 -05'00'