REGION 10
SEATTLE, WA 98101

Clean Air Act - Risk Management Program – Section 112(r)
Emergency Planning Community Right-to-Know Act – Sections 302, 311 and 312
On-site Compliance Inspection Report
Americold Logistics, LLC

PURPOSE

The purpose of this On-site Compliance Inspection was to determine compliance with the Clean Air Act Section 112(r) Risk Management Program (40 C.F.R. Part 68) and the Emergency Planning and Community Right to Know Act Sections 302, 311 and 312.

CAA Section 112(r)(7) requires facilities that hold more than a threshold quantity of a regulated substance in a process to develop and implement a Risk Management Program. PCRA Section 311 requires facilities that hold chemicals above reporting threshold to submit copies of the SDSs or a list of these chemicals to the State Emergency Response Commission, the Local Emergency Planning Committee and the local fire department. EPCRA Section 312 requires the Annual Chemical Inventory Reports (Tier II) for the current calendar year to be submitted by March 1 of the following year. The Tier II is required to be submitted to the SERC, LEPC and fire department. EPCRA Section 302 requires any facility that has any EHS above the threshold planning quantities to notify the SERC and LEPC. LEPCs should also include the EHS(s) in their emergency response plans. Facilities covered under EPCRA Section 312 are required to indicate on the Tier II if they are subject to EPCRA Section 302 emergency planning requirements.

COMPANY INFORMATION

Name:	Americold Logistics, LLC
Mailing Address:	10 Glenlake Parkway, Suite 600, South Tower Atlanta, Georgia 30328
Website:	https://www.americold.com/

FACILITY INFORMATION

Name:	Americold Burley Plant #80557
Facility Address:	280 West Highway 30 Burley, Idaho 83318
Latitude/Longitude:	42.535258, -113.849761
RMP Facility ID#:	100000159909
FRS ID#:	110000757903
EJ Concerns:	Yes (90%)

CONTACT INFORMATION (RMP Implementation)

Name:	Jennifer Campbell
Title:	Regional PSM
Phone Number:	(971) 221-1105
E-mail:	jennifer.campbell@americold.com

EMERGENCY CONTACT INFORMATION

Name:	Nick Bailey
Title:	EMM
Phone Number:	(208) 553-1236
E-mail:	nick.bailey@americold.com

INSPECTION DETAILS

Inspection Date:	September 18, 2024
Inspection Time:	9:00 AM – 2:15 PM
Inspectors:	Edward Johannes, US EPA R10, SEE Grantee, Lead RMP/EPCRA Inspector Peter Phillips, US EPA R10, SEE Grantee, RMP/EPCRA Inspector Erin Williams, US EPA R10, RMP/EPCRA Inspector Mhara Coffman, US EPA R10, RMP/EPCRA Inspector Ryan Bowlsby, US EPA R10, RMP/EPCRA Inspector-in-Training

On September 9, 2024, EPA emailed a Notice of Inspection Letter to the facility informing them of a planned RMP and EPCRA inspection. The letter included CAA Section 112(r)(6)(L) requirement that facility employees and employee representatives, such as a union representative, have the right to participate in the RMP inspection. A copy of the letter must be provided to the employee representatives and the letter posted in a manner accessible to employees in the facility.

- Is the facility is unionized? Yes ☐ No ☒
  If yes, name of union:
- Was an employee representative present during the inspection? Yes ☐ No ☒
  If yes, name/title:

GENERAL INFORMATION

The facility is regulated under the Risk Management Program as a Program Level 3 facility and is owned and operated by Americold Logistics, LLC (Americold). Americold operates with one shift between 8:00 AM to 4:30 PM Monday through Friday. There are twenty-six full-time employees on site.

Originally Atlantic Ice & Coal Company, the 120-year-old Americold based in Atlanta, Georgia, has grown to be the second largest temperature-controlled warehousing and distribution services provider in the world. Americold owns and operates 245 temperature-controlled warehouses, with approximately 1.5 billion refrigerated cubic feet of storage, around the world. Americold's facilities serve food producers, processors, distributors, and retailers to consumers.

The facility in Burley, Idaho, is a third-party cold storage warehouse that chills and freezes a variety of food products. The facility uses 24,327 pounds of anhydrous ammonia to maintain temperature-controlled atmospheres in two areas (F and G) designated as freezer rooms and one cooler room. The

refrigeration process consists of one engine room with four screw compressors, two high pressure receivers, associated piping, valves, and equipment, that cycles anhydrous ammonia through various physical states (high pressure liquid, low pressure liquid, low pressure vapor, high pressure vapor, then back to high pressure liquid) to provide refrigeration for the cold storage and freezer rooms. The safety equipment in the engine room includes ammonia sensors and alarms, two king valves, pressure relief valves, emergency ventilation via four wall intake louvers and two ceiling exhaust fans, and an eyewash/shower stations located inside and outside the engine room.

A maintenance contractor, Superior Industrial Refrigeration calibrates the ammonia sensors every two years.

The facility has an Emergency Action Program (EAP) in place. The Emergency Action Team (EAT) is trained as a First Responder Operations Level and gets annual training. All EAT members are fit tested and respiratory trained annually.

DATE AND PROGRAM LEVELS OF SUBMITTED RMP

Initial Submission Date: August 18, 1999
Date of Latest Update: November 14, 2022

- Has the facility has been inspected in the past 5 years? Yes ☐ No ☒
  If yes, date of last inspection:
- Is the facility High Risk? Yes ☒ No ☐

Process (as reported in the RMP)

Process ID	Description	Process Chemical ID	NAICS Code	Program Level	Chemical Name CAS Number	Quantity (lbs.)
1000128313	Anhydrous Ammonia	1000160894	49312	3	Ammonia, Anhydrous (7664-41-7)	24,372

CAA TITLE V AIR PERMIT

- Does the facility have a CAA Title V Permit? Yes ☐ No ☒
  If yes, permit number:

EMERGENCY RELEASE / ACCIDENT HISTORY

- Did an RMP reportable release occur in the past 5 years? Yes ☐ No ☒
- Did a CERCLA/EPCRA reportable release occur in the past 5 years? Yes ☐ No ☒
  If either yes, date and description of release:

EPCRA 312 – TIER II REPORT

- Was the 2023 Tier II report submitted to the SERC? Yes ☒ No ☐
  If yes, date Tier II was submitted: February 7, 2024
  If no, calendar year of the most recent Tier II:

- Was the 2023 Tier II submitted to the LEPC/fire department? Yes ☒ No ☐
  If yes, date Tier II was submitted: February 7, 2023

- Is the facility subject to EPCRA Section 302? Yes ☒ No ☐
  If yes, is it correctly checked on the Tier II? Yes ☒ No ☐

- Is the subject to RMP correctly checked on the Tier II? Yes ☒ No ☐
- Is RMP facility ID correct on the Tier II? Yes ☒ No ☐

EPCRA CHEMICALS OVER THRESHOLD

According to the most recent Tier II, the facility stores the following hazardous chemicals over the reporting threshold. See the attached Tier II, Attachment C, for inventory amounts.

Chemical Name	EHS (Yes or No)	CAS Number
Anhydrous Ammonia	Yes	7664-41-7
Sulfuric Acid	Yes	7664-93-9
Lead	No	7439-92-1

EPCRA 311 – SDSs

The facility stores two EHS on-site over the TPQ and is subject to EPCRA Section 302.
See Attachment B for SDSs and chemical information on the EHSs stored over the reporting threshold at the Facility.

EPCRA 302 – LEPC Coordination

Emailed invitations to the LEPC to conduct joint exercises.

LEPC

Agency:	Cassia County Office of Emergency Management
Program Contact:	Jennifer Gee
Title:	Director
Address:	129 East 14th Street Burley, Idaho 83318
Phone Number:	(208) 878-1002
Email:	jgee@cassiacounty.org
Website:	https://www.cassia.gov/emergency-management

INSPECTION ENTRY

Edward Johannes led the inspection entry. The inspection team met with Nick Bailey at the Americold facility in Burley, Idaho. The team arrived at the facility at 9:00 a.m. and was joined by the following facility personnel:

Name	Title
Nick Bailey	Engineering & Maintenance Manager
Jennifer Campbell	Regional Process Safety Manager
Sasha Olsen	General Manager

- Were any SERC, LEPC or fire department representative present? Yes ☐ No ☒
  If yes, names and titles of representatives:

- Is the facility a first responder? Yes ☐ No ☒
  If no, responding agency: Burley Fire Department

The inspection team was escorted to a conference room. Introductions were made by Edward Johannes, who provided a summary of the risk management program and explained the purpose of the visit. Each team member presented their credentials.

EPA requested an explanation of the facility's operations and any additional safety measures that should be taken during the site tour. Close-toed safety shoes, eye protection, and hearing protection were required while touring the facility.

FACILITY TOUR / ON-SITE OBSERVATIONS

The facility tour was conducted from approximately 9:30 AM to 10:20 AM. The inspection team was escorted by Nick Bailey, Jennifer Campbell, and Sasha Olsen. The inspection team observed the engine room, freezers, chiller room, condensers on the roof and the forklift battery charging area. Photographs were taken of these areas and are included in Attachment A.

Freezers F and G were observed containing piping, evaporators (mounting reinforced above racks), and ammonia detectors (Photos 1 and 2). Facility representatives stated the ammonia detector activates audible and visual alarms at 25 parts per million (ppm) and the emergency ventilation system in the engine room activates at 50 ppm. The emergency shutdown for the compressors activates at an ammonia concentrations reaching 1%.

An emergency eyewash station and return hoist were observed in the forklift battery charging area (Photos 3, 4, and 5).

In the chiller room an ammonia detector is located on the ceiling and two evaporators are located behind the product racks (mounting was not reinforced above the racks) (Photos 6, 7, and 8).

The engine room entrance door has ammonia hazard placards, an air sampling port sign, an authorized personnel only notice, a ventilation control switch next to the door not labeled and emergency/constant fan warning lights above the door (Photo 9). No emergency stop button was seen next to engine room entrance door. An emergency eyewash/shower station is in the maintenance

area next to the engine room (Photo 10). An ammonia smell was present in the engine room after oil was drained from the oil separator. In the engine room there are four screw compressors (Photos 11 and 18), high pressure receiver (HPR) (Photo 15), low pressure receiver (LPR), V-4 subcooler (Photo 24), V-4 oil pot (some rust present), and oil separators. Pressure relief valves (PRV) with installation tags for each compressor has an install date of August 2020 (Photos 12 and 25). The engine room ventilation system has two ceiling exhaust fans, and four louvered air intakes (Photos 11, 16, 20, 23, 26, and 32). The engine room exit doors have push bars (Photos 13 and 16). Removed insulation was visible on ammonia piping (blue colored) for a compressor, a valve was marked with a red tag and piping is labeled with directional arrows (Photo 14). The lockout/tagout station is located in the engine room (Photo 19). The HPR manual king valve is labeled (Photo 15). A second manual king valve located at ceiling level is labeled and accessible using a chain (Photo 21 and 22). Ice buildup is visible on valves, piping and equipment (Photos 15 and 25). Two ammonia detectors are in the engine room that alarm at 25 ppm, activate the ventilation at 50 ppm, and shut down the engine room at 1% LEL (Photos 17 and 24). An emergency eyewash/shower station is located in the engine room (Photo 22). A monthly oil management log is kept in the engine room that operators use to record the draining and adding of oil for vessels and equipment (Photo 27). A spill release procedure, emergency contact and safety information and hot works board is in the maintenance area (Photos 28 and 29). Three condensers are located on the roof above the engine room (Photo 30). An emergency stop button and ventilation controls located outside the engine room next to the rollup doors were not labeled (Photo 31). The outside entrance door located on the west side of the engine room has ammonia hazard placards, an authorized personnel only notice, a constant fan notice, and emergency/constant fan warning lights above the door (Photo 32). The Emergency Response Unit trailer is located in the parking lot near the engine room (Photo 33). A windsock is located on the northeast corner of the roof of the engine room (Photo 34). The outside entrance door located on the north side of the engine room has only an authorized personnel only notice; no warning placards are posted (Photo 34). Ammonia diffusion tank, mislabeled MH3, is located adjacent to the condensers.

After touring the RMP-covered process areas and the EPCRA chemical storage areas, the inspection team returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to Nick Bailey, Jennifer Campbell, and Sasha Olsen.

INFORMATION COLLECTED FROM FACILITY

No information was collected from the facility during the inspection.

AREAS OF CONCERNS

1. Ammonia pipe attached to Compressor #2 is not capped.
2. Ammonia diffusion tank is mislabeled as MH3 (metal hydride).
3. Outside entrance door on north side of engine room has no posted ammonia and NFPA hazard warning placards.
4. Access to the Emergency Response Unit (ERU) trailer by Americold's response team may be impacted during an ammonia release. Americold should consider relocating the ERU trailer away from the engine room.

FOLLOW-UP DOCUMENTS REQUESTED

The following documents were unable to be located during the inspection by the facility representatives. The documents were requested to be sent to EPA by October 2, 2024. The documents were to be reviewed after the inspection to determine compliance with Section 112(r) of the CAA. The facility did not provide the requested document.

1. 2023 PHA recommendations.
2. 2020 and 2023 CA recommendations.

ON-SITE INSPECTION REPORT CERTIFICATION

This is to certify that I, Edward Johannes, as the lead inspector for the On-site Compliance Inspection and that I have verified the accuracy of the information in this report.

EDWARD JOHANNES (Affiliate)

Digitally signed by EDWARD JOHANNES (Affiliate)
Date: 2025.02.25 18:09:26 -08'00'

Inspector Signature

JAVIER MORALES

Digitally signed by JAVIER MORALES
Date: 2025.02.26 08:27:51 -08'00'

RMP Coordinator Signature

ERIN WILLIAMS

Digitally signed by ERIN WILLIAMS
Date: 2025.02.26 08:35:15 -08'00'

EPCRA Coordinator Signature

MATTHEW QUARTERMAN

Digitally signed by MATTHEW QUARTERMAN
Date: 2025.02.26 10:15:06 -08'00'

Land Enforcement Section Chief Signature

ATTACHMENTS

A. Photo Log and Photographs
B. Safety Data Sheets (SDSs)
C. Tier II Submission

ATTACHMENT A

Photo Log and Photographs

Attachment A – Photo Log
Site Name: Americold Burley Plant # 80557
City, State: Burley, ID
Photographer: Ryan Bowlsby

File	Photo ID	Date	Time	Description
Photo1.jpeg	Photo1	9/18/2024	9:30 AM	Freezer F - Ammonia pipe with contents & flow direction marked
Photo2.jpeg	Photo2	9/18/2024	9:31 AM	Freezer G - Evaporator
Photo3.jpeg	Photo3	9/18/2024	9:33 AM	Forklift battery charging area & emergency eyewash station
Photo4.jpeg	Photo4	9/18/2024	9:34 AM	Forklift battery charging area
Photo5.jpeg	Photo5	9/18/2024	9:35 AM	Forklift battery charging area with hoist
Photo6.jpeg	Photo6	9/18/2024	9:36 AM	Chiller Room - Ammonia sensor
Photo7.jpeg	Photo7	9/18/2024	9:37 AM	Chiller Room - Evaporator
Photo8.jpeg	Photo8	9/18/2024	9:38 AM	Chiller Room - Evaporator
Photo9.jpeg	Photo9	9/18/2024	9:39 AM	Engine Room - Door with warning placards & air sampling port
Photo10.jpeg	Photo10	9/18/2024	9:40 AM	Maintenance Area - Emergency eyewash/shower station
Photo11.jpeg	Photo11	9/18/2024	9:41 AM	Engine Room - Compressor & intake ventillation
Photo12.jpeg	Photo12	9/18/2024	9:42 AM	Engine Room - Compressor PRV tag
Photo13.jpeg	Photo13	9/18/2024	9:43 AM	Engine Room - Door with push bar
Photo14.jpeg	Photo14	9/18/2024	9:44 AM	Engine Room - Pipe condition & labeling
Photo15.jpeg	Photo15	9/18/2024	9:45 AM	Engine Room - King Valve #1
Photo16.jpeg	Photo16	9/18/2024	9:46 AM	Engine Room - Intake ventilation
Photo17.jpeg	Photo17	9/18/2024	9:47 AM	Engine Room - Ammonia sensor
Photo18.jpeg	Photo18	9/18/2024	9:48 AM	Engine Room - Compressors
Photo19.jpeg	Photo19	9/18/2024	10:48 AM	Engine Room - Lockout/tagout board
Photo20.jpeg	Photo20	9/18/2024	11:48 AM	Engine Room - Ceiling exhaust ventilation
Photo21.jpeg	Photo21	9/18/2024	12:48 PM	Engine Room - King Valve #2
Photo22.jpeg	Photo22	9/18/2024	1:48 PM	Engine Room - Emergency eyewash/shower station
Photo23.jpeg	Photo23	9/18/2024	2:48 PM	Engine Room - Intake ventilation
Photo24.jpeg	Photo24	9/18/2024	3:48 PM	Engine Room - Ammonia sensor
Photo25.jpeg	Photo25	9/18/2024	4:48 PM	Engine Room - Compressor PRV tag
Photo26.jpeg	Photo26	9/18/2024	5:48 PM	Engine Room - Ceiling ventilation exhaust
Photo27.jpeg	Photo27	9/18/2024	6:48 PM	Engine Room - Monthly log
Photo28.jpeg	Photo28	9/18/2024	7:48 PM	Maintenance Area - SOP board
Photo29.jpeg	Photo29	9/18/2024	8:48 PM	Maintenance Area - SOP board
Photo30.jpeg	Photo30	9/18/2024	9:48 PM	Engine Room Roof Top - Condensers
Photo31.jpeg	Photo31	9/18/2024	10:48 PM	Outside Engine Room - Emergency stop
Photo32.jpeg	Photo32	9/18/2024	11:48 PM	Outside Engine Room - Intake vent & door with warning placards
Photo33.jpeg	Photo33	9/18/2024	12:48 AM	Parking Lot - Emergency Response trailer with SCBAs
Photo34.jpeg	Photo34	9/18/2024	12:48 AM	Outside Engine Room - Windsock & door with warning placard