

Clean Air Act 112(r), Risk Management Program Inspection Report

Alatrade Foods LLC- (Plant 4)

Phenix City, Alabama

March 3, 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 Alatrade Foods LLC (the facility) located in Phenix City, Russell County, Alabama. EPCRA Tier II submittals from the facility were also obtained during the onsite inspection. The inspection 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. Numerous documents were provided for review off-site. This report will provide background information about the facility and a list of observations.

2.0 Background

The Alatrade Foods LLC facility processes poultry and utilizes cold storage/cooler. 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. The products stored are refrigerated foods (poultry) for human consumption and inherently pose no known environmental or safety risks. The facility started operating in 2007. Alatrade Foods LLC's corporate location is in Guntersville, Alabama and it operates seven (7) facilities in the United States with over 1300 full time employees. The facility has approximately 700 full time employees. The facility is open 24 hours a day.

The anhydrous ammonia process used by the facility for its refrigeration is regulated pursuant to Program 3 of the RMP. According to facility records, the facility has one ammonia process, with a design inventory/charge of 12,913 pounds of ammonia (Ref. Ammonia Refrigeration System – System Overview, Revision 1, January 2016). The ammonia refrigeration process at the facility is subject to the RMP requirements of 40 C.F.R. Part 68 and to EPCRA Sections 302, 311 and 312. The background specifics are summarized in Table 1 presented below.

TABLE 1: Inspection Information Summary

Inspection Team

Lead/Inspector in training: Chetan Gala, EPA
Senior Inspector: Jordan Noles, EPA
Inspector: Bethany Terpin, EPA

Date of Facility Visit: March 3, 2022

Facility Identification

Name: Alatrade Foods, LLC (Plant 4)
Street Address: 6 Downing Drive
City: Phenix City County: Russell State: Alabama Zip: 36869
EPA Facility ID No: 1000 0023 1572
Latitude: 32.396779
Longitude: -85.048794

Name, address and phone of corporate parent company:

Owner/Operator: Alatrade Foods LLC
Mailing Address: 725 Blount Ave.,
City: Guntersville State: Alabama Zip: 35976-1505
Phone: (256) 571-9696
Website: <https://www.alatrade.com>

Name, title, and email of the person responsible for 40 C.F.R. Part 68 implementation:

Name: Daniel Lowery
Title: Safety and Environmental Manager
Email: dlowery@alatrade.com

Name and title of emergency contact:

Name: Oscar Doty
Title: Maintenance Manager
Day phone: (334) 664-2300
24-hour Phone: (662) 417-2809
Email: Odoty@alatrade.com

Name and titles of stationary source personnel involved in site inspection (*accompanied site tours, provided documents and explanations*):

Name	Title	Phone	Email
Oscar Doty	Maintenance Manager	(662) 417-2809	Odoty@alatrade.com
Jeff Holderfield	Supervisor Refrigeration	(256) 251-6000	jholderfield@alatrade.com
Daniel Lowery	Safety/Environmental Manager	(256) 572-7662	dlowery@alatrade.com
Dave Robinson	Plant Manager	(334) 664-2319	daverobinson@alatrade.com
Anthony Hall	Union Steward/Floor Personnel	Call Plant	-----N/A-----

Note: This is a union facility

Date and Program Levels of Submitted Risk Management Plan

Date of initial submission: February 25, 2016

Date of recent submission: January 07, 2021

Process ID	Process Description	Process Chemical ID	Process Program Level	Chemical Name	Quantity (lbs)	NAICS code	Flammable/ Toxic
1000113710	Ammonia Refrigeration	1000142072	Level 3	Ammonia (anhydrous) CAS # 7664-41-7	12000	311615 (Poultry Processing)	Toxic

3.0 Observations

The inspection of the facility evaluated compliance with various sections of the RMP regulations (40 C.F.R. Part 68, Program Level 3), using the inspection checklist included in “Guidance for Conducting Risk Management Program Inspections under Clean Air Act Section 112(r)” and “Ammonia Refrigeration List of Key Safety Measures.” The inspection involved discussions with the facility representatives regarding its ammonia refrigeration processes, the facility’s RMP, a review of paperwork associated with the facility’s most recent Risk Management Plan (RMPlan), and a walkthrough of the facility. Inspection opening and closing conferences were conducted. Observations from the RMP inspection at the facility are discussed below:

1. 40 C.F.R. § 68.65(d)(2) requires documentation that equipment complies with recognized and generally accepted good engineering practices. During the facility walkthrough, EPA inspectors observed the following:
 - Neither of the two (2) egress doors at the machinery room were equipped with panic hardware to facilitate exit in case of emergency. [e.g., Ref. to attached copy of photo labeled: Photo 5].
 - IIAR 2 6.10.2 states “Machinery room doors shall be self-closing and tight fitting. Doors that are part of the means of egress shall be equipped with panic hardware and shall be side hinged to swing in the direction of egress for occupants leaving the machinery room. Where the machinery room is not provided with fire sprinklers, doors communicating with the building interior shall be one-hour fire-rated. Doors to the outdoors shall be fire rated where required by the Building Code based on the fire rating required for exterior wall openings.”
 - Flammable materials/liquids were stored in the engine/machinery room. [e.g., Ref. to attached copy of photo labeled: Photo 6].
 - ANSI/IIAR 2-2014 section 6.4 states “Combustible materials or flammable liquids shall not be stored in machinery rooms outside of approved fire-rated storage containers.”

- Surface corrosion/rusting was observed present on piping and stop/valves near the C-1/ C-2 compressors and piping connecting the “King valve”. In addition, piping, valve/casing and stems around the “Main Pumped Liquid Valve” appear to have significant surface corrosion/rusting. [e.g., Ref. to attached copy of photo labeled: Photo 1, 2, 3, and 4].
 - IIAR 6-2019, 11.1.1 states “Where pitting, surface damage, general corrosion, or a combination thereof, is visually observed on a metal surface of the piping, deficient areas shall be further evaluated per Sections 11.1.1.1 – 11.1.1.3.”
- Inspectors observed at least one valve/valve stems that did not contain valve identification tags. [e.g., Ref. to attached copy of photo labeled: Photo 4].
 - ANSI/ASHRAE 15-2016, 11.2.2 states “systems containing more than 110 pounds (50 kg) of refrigerant shall be provided with durable signs having letters not less than 0.5 inch (12.7 mm) in height designating valves or switches for controlling the refrigerant flow.”
- Heavy ice build-up was observed below the “Main Pumped Liquid Valve” and the piping in the vicinity. [e.g., Ref. to attached copy of photo labeled: Photo 4].
 - Pipes or vessels can develop ice buildup if they are not properly insulated, and the ice buildup can also add considerable weight on piping and vessel supports that are not designed to hold extra weight. IIAR 6-2019, 5.6.8 states “Equipment and piping shall be kept free from excessive ice buildup.” IIAR 6 5.6.8.2 states “Ice accumulation shall not be permitted to deflect or bend pipes, displace components, or negatively impact the system’s structural integrity.”
- Inspectors observed a hole in the insulation on piece of ammonia system piping/equipment that was left exposed to the environment.
 - IIAR 6-2019, 11.1.2 states “For insulated piping, where insulation is removed, partly or completely, for visual inspection or remaining wall thickness measurement(s), a protective coating shall be applied to the exposed metal surface and insulation shall be replaced in accordance with the manufacturer’s installation instructions after arresting any identified exposed piping metal surface corrosion.”
- Anhydrous ammonia vessel, piping, equipment, system on the outside of the engine/machinery room was surrounded by a chain link fence. In this area, employee parking is also located, and parking spots are in few feet of the ammonia system installation. Inspectors did not observe any other safety barriers or measures that would prevent potential vehicular or accidental damage or rupture to the ammonia system by external sources.
 - ASHRAE 15-1994, as amended Section 11.1 General Restrictions — Safeguards. Means shall be taken to adequately safeguard piping, controls, and other refrigerating equipment to minimize possible accidental damage or rupture by external sources.
 - ANSI/IIAR 2-2014 Section 7.2.4 states, “Equipment shall be protected where a risk of physical damage exists. Where equipment containing ammonia is located in an area with

heavy vehicular traffic during normal operations and a risk of impact exists, vehicle barriers or alternative protection shall be provided in accordance with the Fire Code.”

2. 40 C.F.R. § 68.67(e) requires the owner or operator to establish a system to promptly address the team's findings and recommendations; assure that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete actions as soon as possible; develop a written schedule of when these actions are to be completed; communicate the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions.
 - EPA inspectors reviewed the Facility’s June 3, 2020, Process Hazard Analysis (PHA) and associated recommendations tracking tables. The Facility’s 2020 PHA is the first PHA conducted after initial RMP registration. The Facility did conduct a previous PHA on September 10, 2015. In both PHAs What-If/Checklist technique is utilized to explore potential process hazards.
 - For the 2015 PHA, the report is illustrated in tabular/chart format with nine (9) columns and respective column headings and contents to include a column for Assignment, Date Assigned, Date Completed, and Resolutions. The PHA chart for 2015, shows that 1 recommendation item resolution was achieved/completed in 2018; 5 items were completed in 2017; 52 items completed in 2016; and 29 items in 2015.
 - For the 2020 PHA, the What if/Checklist Log Sheet chart doesn’t have the aforementioned columns present in the 2015 PHA. Nor does the 2020 PHA mention who is assigned to address the recommendation. The What if/Checklist Log Sheets do include a column for the questions, scenarios, consequences, frequency, risk rating, and recommendations.
 - The 2020 PHA contains fifteen (15) recommendations. The time to completely address a recommendation can be inferred based on the risk assessment code of either A, B, C, or D noted in the PHA’s What if/Checklist Log Sheets along with the specific recommendation. The 2020 PHA’s risk assessment code breakdown is: for 7 recommendations the risk assessment code assigned was D and for 8 recommendations the risk assessment code assigned was C. The risk assessment code C equals a time to complete or address a recommendation of no more than a year from PHA completion. The risk assessment code D equals a time to complete or address a recommendation of no more than 2 years from PHA completion.
 - No record or documentation was presented that would illustrate the status of 2020 PHA recommendations. A compliance audit was conducted in 2021. The audit report does not provide specifics in this regard.
3. 40 C.F.R. § 68.79(d) requires the owner or operator to promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected.
 - The 2021 RMP Compliance Audit does not provide a schedule for planned completion of open action items, documented responses and planned actions in response to identified deficiencies, or personnel assignments completing open action items.

4. 40 C.F.R. § 68.93 requires the owner or operator to perform the annual emergency coordination activities. 40 C.F.R. § 68.93 states in part that the owner or operator of a stationary source shall coordinate response needs with local emergency planning and response organizations to determine how the stationary source is addressed in the community emergency response plan and to ensure that local response organizations are aware of the regulated substances at the stationary source, their quantities, the risks presented by covered processes, and the resources and capabilities at the stationary source to respond to an accidental release of a regulated substance.
 - The Facility is a non-responding stationary source. The Facility plans and coordinates with Phenix City Fire Department. However, the Facility representative indicated that the Phenix City Fire Department would not and does not respond to any Ammonia leak or release at the Facility. The Facility representatives stated that the Facility relies on Fort Benning's Fire Department for Ammonia emergency response. However, the Facility has never conducted any planning and coordination activity/meeting with Fort Benning's Fire Department nor has the Facility performed or conducted any annual notification exercises with Fort Benning's Fire Department.
 - No documentation was presented of the annual coordination activity with Phenix City Fire Department or with Fort Benning Fire Department.

Attachment:

A copy of the photos referenced in the report.

Attachment



Photo 1



Photo 2



Photo 3



Photo 4



Photo 5



Photo 6

Inspection Report,

Prepared by:

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Chetan Gala, Lead/Inspector in training
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Date

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Jordan Noles, Inspector
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North Air Enforcement Section
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Todd Groendyke, Chief
U.S. EPA Region 4
South Air Enforcement Section
Air Enforcement Branch

Date