

## **Supplemental Attachment to Application for Appeal of:**

**Americold Logistics, LLC** (identified on the Fire Correction Inspection Notice as “Atlas Cold Storage”), located at **240 Chester Street**, St. Paul, Minnesota 55107.

On May 21, 2021, Americold timely appealed Deficiency List Item Number 4, which contends that Americold is in violation of MSFC 3205.5. In support of its appeal, Americold submits the following additional information for consideration.

First, Americold provides the cost proposals [Americold 001-011] for a comparable project recently considered at a similar facility. These figures lead Americold to reasonably believe that the cost of designing, engineering, and installing an automatic sprinkler system at the St. Paul facility would exceed 2 million dollars. Americold views this figure as conservative in light of the unique construction challenges posed by the age of the building and the asbestos in the building’s construction. A copy of the Asbestos Inspection Report is also provided. [Americold 012-211]

Second, Americold provides documentation of the alternative preventative measures already in place at the facility. In short, Americold is subject to extensive regulation that subjects it to mandatory requirements beyond those found in the Minnesota State Fire Code—and which has the effect of addressing fire safety in ways not envisioned by the Minnesota State Fire Code. Many of these requirements stem from Process Safety Management standards, which require that Americold implement recognized and generally accepted good engineering practices (RAGAGEP). These regulations require that Americold give meticulous attention to potential sources of combustion, as well as the dependable operation of its suppression systems:

- Every five years Americold completes a comprehensive evaluation of the components of its refrigeration system—ensuring those systems remain in good working order and do not pose combustion hazards. A copy of the results of most recent mechanical integrity audit is enclosed. [Americold 212-216]
- Americold utilizes an annual third-party infrared electrical systems survey, which locates and documents thermal anomalies (“hot spots”) in the electrical system. Correction of these anomalies ensures the electrical system does not present a hazard. A copy of the most recent survey is attached. [Americold 217-223]
- Americold personnel conduct monthly fire extinguisher inspections—and those personnel receive yearly training on those inspections. Copies of those documents are enclosed. [Americold 224-237] In addition, Americold does annual fire extinguisher testing. [Americold 238-239]
- Americold has periodic third-party reviews of its fire alarm systems. The most recent Fire Alarm Inspection Report is enclosed. [Americold 240-247]
- Americold conducts monthly facility checks, which includes inspection of emergency lights, emergency exit doors, and fire exits. The most recent inspection is enclosed [Americold 248-249]

In addition, Americold administers employee training on two key topics, both of which are enclosed:

- The Egress, Fire Prevention, & Fire Protection training identifies the proper exit routes in the event of a fire emergency, and trains on the use of fire extinguishers and Americold's fire prevention plan. [Americold 250-293]
- The Hot Work and Fire Watch Training ensures that work using a direct flame, such as welding, cutting, or soldering, is performed only under closely monitored and controlled circumstances. [Americold 294-313]

Americold provides these additional documents in effort to illustrate that installation of the requested fire suppression system would be an economically infeasible undertaking—especially in light of the already-substantial efforts committed to fire safety. Americold respectfully submits that these additional precautions are above and beyond those typically encountered, and merit weighty consideration that Americold is compliance with the intent and purpose of the Minnesota State Fire Code.