Message

From: [redacted]

Sent: 8/20/2025 2:49:17 PM
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Subject: Supplemental Evidence – Refrigeration Equipment Handling and Ongoing Hazards at Walmart Store #131, Mount Pleasant, TX (336835)
Attachments: 2025-08-20 - EPA - Supplemental Update (1).pdf

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Good morning,

I am submitting supplemental information regarding my active EPA complaint (FY25-336835-3714-CV) concerning the CAP-X refrigeration replacement project at Walmart Supercenter #131, 2311 S. Jefferson Avenue, Mount Pleasant, TX.

On August 20, 2025, I observed dismantled bunker-style coolers from the store staged both indoors and outdoors, with case wells filled with debris, exposed wiring and piping, and uncapped foam insulation. Several units were stored outdoors on bare concrete without protection. These observations raise ongoing concerns about:

- **Clean Air Act §608 compliance** (40 CFR Part 82, Subpart F): CAP-X project plans explicitly require refrigerant recovery and documentation for any equipment removed ("all equipment not reused shall be recovered and removed by certified personnel; recovery logs shall be maintained"). The absence of capped lines or recovery tags strongly suggests potential non-compliance.

- **Waste management (40 CFR Part 279, RCRA)**: dismantled equipment may contain lubricants, used oil, or condensate; outdoor storage risks uncontrolled release.

- **Stormwater exposure**: Storing dismantled refrigeration units outdoors exposes insulation, oils, and debris to rainwater runoff. At the time of my observation (August 20, 2025), dismantled units were already staged outdoors. Later that morning, it began raining in Mount Pleasant, creating an immediate risk of pollutants being washed into storm drains."

It is important to note that according to the approved plans:

- "All existing refrigerated cases are to remain unless noted otherwise."
- Cases not removed were to be re-skinned only, with new lids and cosmetic finishes.

This means the legacy base refrigeration components (coils, frames, pans) were not replaced. If these are the same units previously documented holding temperatures above the 41°F threshold, re-