



U.S. Chemical Safety and Hazard Investigation Board

OFFICE OF GENERAL COUNSEL

Memorandum

To: Board Members

From: Steven Messer
Acting General Counsel

STEVEN
MESSER

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STEVEN MESSER
Date: 2025.12.05
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Cc: Charles Barbee
Adam Henson
Leadership Team

Subject: Board Action Report – Notation Item 2026-05 | Recommendation to National Fire Protection Association (NFPA) (2021-03-I-GA-R11) from the Foundation Food Group Fatal Chemical Release investigation (2021-03-I-GA)

Date: December 5, 2025

On December 4, 2025, the Board approved Notation Item 2026-05, thereby designating Recommendation 2021-03-I-GA-R11 to NFPA from the Foundation Food Group Fatal Chemical Release investigation (2021-03-I-GA) with the status of Open – Acceptable Response or Alternate Response.

Voting Summary – Notation Item 2026-05

Disposition: APPROVED

Disposition date: December 4, 2025

	Approve	Disapprove	Calendar	Not Participating	Date
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S. Johnson	X				12/4/2025
S. Owens	X				12/4/2025



U. S. Chemical Safety and Hazard Investigation Board

RECOMMENDATION STATUS CHANGE

SUMMARY

Report:	Foundation Food Group Fatal Chemical Release
Recommendation Number:	2021-03-I-GA-R11
Date Issued:	December 11, 2023
Recipient:	National Fire Protection Association (NFPA)
New Status:	Open – Acceptable Response or Alternate Response
Date of Status Change:	December 4, 2025

Recommendation Text:

Update NFPA 55 Compressed Gases and Cryogenic Fluids Code to:

- a) *require the use of atmospheric monitoring with cryogenic asphyxiants in accordance with industry guidance such as is contained in CGA P-76 Hazards of Oxygen-Deficient Atmospheres and CGA P-12 Safe Handling of Cryogenic Liquids in addition to CGA P-18 Standard for Bulk Inert Gas Systems; and,*
- b) *include guidance on the adequate safe location of manual shutoff valves and devices such as emergency push buttons used to activate remotely operated emergency isolation valves (ROEIVs). At a minimum this guidance should be harmonized with the requirements of ISO 13850 Safety of machinery – Emergency stop function – Principles for design.*

Board Status Change Decision:

A. Rationale for Recommendation

On January 28, 2021, liquid nitrogen overflowed from an immersion freezer located inside Plant 4 at the Foundation Food Group (FFG) facility in Gainesville, GA. The release occurred while two maintenance employees were troubleshooting the equipment. Once the liquid nitrogen was released, it quickly vaporized and accumulated inside the room in which the equipment was located, creating an oxygen deficient atmosphere.

The two maintenance employees were fatally injured. Upon discovering the two fatally injured employees, an emergency response was initiated which included attempts by other employees to rescue them and isolate the freezer from its liquid nitrogen source. During these activities, four additional employees of FFG were fatally injured. Additionally, three more FFG employees and one firefighter were seriously injured, presenting symptoms of oxygen deprivation. The incident resulted in an estimated \$1.95 million in damage.

The U.S. Chemical Safety and Hazard Investigation Board (CSB) investigated the incident and found several safety issues including faulty equipment design, inadequate precautions for using liquid nitrogen, the lack of atmospheric monitoring and alarms, inadequate emergency preparedness, a lack of a safety management system, and a lack of regulatory coverage for

cryogenic asphyxiants. As a result of these findings, the CSB issued one recommendation to the National Fire Protection Association (NFPA). This status change summary addresses CSB Recommendation No. 2021-03-I-GA-R11.

B. Response to the Recommendation

NFPA has notified the CSB that language intended to meet the recommendation has been approved for the 2026 Edition of NFPA 55 Compressed Gases and Cryogenic Fluids Code (NFPA 55). NFPA 55 is expected to be published during 2026. Once the standard is published the CSB can evaluate this recommendation for closure.

C. Board Analysis and Decision

Based upon the information above, the Board voted to change the status of CSB Recommendation No. 2021-03-I-GA-R11 to: “Open – Acceptable Response or Alternate Response.”