



U.S. Chemical Safety and Hazard Investigation Board

OFFICE OF GENERAL COUNSEL

Memorandum

To: Board Members

From: Steven Messer
General Counsel

STEVEN
MESSER

Digitally signed by
STEVEN MESSER
Date: 2026.09.17
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Cc: Charles Barbee
Adam Henson
Leadership Team

Subject: Board Action Report – Notation Item 2026-75 | Recommendation to the International Code Council (ICC) (2021-03-I-GA-R12) from the Foundation Food Group Fatal Chemical Release investigation (2021-03-I-GA)

Date: September 17, 2026

On September 16, 2026, the Board approved Notation Item 2026-75, thereby designating Recommendation 2021-03-I-GA-R12 to the International Code Council (ICC) 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 2026-75

Disposition: APPROVED

Disposition date: September 16, 2026

	Approve	Disapprove	Calendar	Not Participating	Date
S. Johnson	X				9/16/2026
S. Owens	X				9/16/2026



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-R12
Date Issued:	December 11, 2023
Recipient:	International Code Council (ICC)
New Status:	Open – Acceptable Response or Alternate Response
Date of Status Change:	September 16, 2026

Recommendation Text:

Update the International Fire 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) in cryogenic fluid service. 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 asphyxiated. Upon discovering the two maintenance employees, an emergency response was initiated which included attempts by other employees to rescue the two maintenance employees and to isolate the freezer from its liquid nitrogen source. During these activities, four additional employees of FFG were asphyxiated. Additionally, three more FFG employees and one firefighter were seriously injured, presenting with symptoms of asphyxia. 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 International Code Council (ICC). This status change summary addresses CSB Recommendation No. 2021-03-I-GA-R12.

B. Response to the Recommendation

ICC has notified the CSB that language intended to meet the recommendation has been approved for the 2027 Edition of the International Fire Code (IFC 2027). IFC 2027 is expected to be published in the fall/winter of 2027. Once the code 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-R12 to: “Open – Acceptable Response or Alternate Response.”