

United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report

The City of Spring Hill Water Treatment Plant

Spring Hill, Tennessee

January 30, 2024

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 water treatment process at the City of Spring Hill Water Treatment Plant (Spring Hill WTP) facility located in Spring Hill, Maury County, Tennessee. This facility was selected for inspection because it had never been inspected under the RMP. The inspection, which was conducted January 30, 2024, 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. Requested program documents were provided for further review off-site. This report will provide a background of the facility and a listing of observations.

2.0 Background

Spring Hill WTP operates a water treatment facility located in Spring Hill, Tennessee. Chlorine is added to water for disinfecting purposes. The process is regulated as program level 3. The threshold planning quantity under the CAA Section 112(r)(7) for chlorine is 2,500 pounds. According to facility records, the facility has a maximum of 8,000 pounds of chlorine on site. The water treatment process at the facility is subject to the RMP requirements of 40 C.F.R. Part 68 and EPCRA Section 302. The facility is also subject to the requirements of OSHA Process Safety Management (PSM) in accordance with 29 C.F.R. 1910.119. The background specifics are summarized as follows in Table 1.

TABLE 1: Inspection Information Summary

Inspection Team

Inspector: Jordan Noles, Environmental Protection Agency (EPA)

Inspector: Justin Stark, EPA

Inspector-in-Training: Callie Sotolongo, EPA

Date of Facility Visit: January 30, 2024

Facility Identification

Name: Spring Hill WTP
Street Address: 4151 Kedron Road
City: Spring Hill County: Maury State: Tennessee Zip: 37174
EPA Facility ID No: 1000 0024 2356
Dun & Bradstreet (D&B) No: N/A
Latitude: 35.704460
Longitude: -86.899695

Name, address and phone of corporate parent company:
Owner/Operator: City of Spring Hill
Mailing Address: 199 Town Center Parkway
City: Spring Hill State: Tennessee Zip: 37174
Phone: (931) 486-2252

Name, title, and email of person responsible for 40 C.F.R. Part 68 implementation:
Name: Jeremy Vanderford
Title: Superintendent
Phone: (931) 797-5957
Email: jvanderford@springhilltn.org

Name and title of emergency contact:
Name: Jeremy Vanderford
Title: Superintendent
Day phone: (931) 797-5957
24-hour Phone: (931) 489-5791
Email: jvanderford@springhilltn.org

Name and titles of stationary source personnel involved in site inspection (*accompanied site tours, provided documents and explanations*):
Name: Jessica Weaver
Title: Utility Director
Phone: (615) 281-2886
Email: jweaver@springhilltn.org

Name: Jeremy Vanderford
Title: Superintendent
Phone: (931) 489-5957
Email: jvanerford@springhilltn.org

Note: This is not a union facility.

Date and Program Levels of Submitted Risk Management Plan

Date of initial submission: July 19, 2019

Date of most recent submissions: July 19, 2019

Process: Chlorination

Process ID: 1000127213

Chemical Name: Chlorine

Program Level as reported in RMP: 3

NAICS codes: 22131 (Water Supply and Irrigation Systems)

3.0 Observations

The inspection of the Spring Hill WTP evaluated various sections of the RMP regulations (40 C.F.R. Part 68, Program Level 3) and the inspection checklist included in “Guidance for Conducting Risk Management Programs Inspections under Clean Air Act Section 112(r).” The inspection began with an opening discussion of facility operations. The discussion was followed by a tour of the facility’s water treatment areas. EPA inspectors then requested paperwork associated with the facility’s Risk Management Plan (RMPlan). The documents were reviewed by EPA inspectors on-site and provided for review off-site. An inspection out-brief was conducted where EPA inspectors described their observations. Observations from the RMP inspection at the Spring Hill WTP 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.
 - Some of the chlorine piping did not have labels indicating the direction of flow. The American National Standards Institute’s, American Society Mechanical Engineer A13.1 requires identification and direction of flow for pipes containing hazardous substances.
2. 40 C.F.R. § 68.150(a) requires the owner or operator to submit a single Risk Management Plan (RMPlan) that includes the information required by §§ 68.155 through 68.185 for all covered processes.
 - Facility representatives indicated that the facility has had over the threshold planning quantity of 2,500 pounds of chlorine on-site, for water disinfecting purposes since the facility opened in 2003. However, the facility did not register its process as an RMP covered process until July 19, 2019.

Inspection Report,

Prepared by:

JORDAN NOLES

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Jordan Noles, Inspector
North Air Enforcement Section
U.S. EPA Region 4

Approved by:

JASON DRESSLER

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Jason Dressler, Section Chief
North Air Enforcement Section
U.S. EPA Region 4