

United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report

Town Branch WWTP

Lexington, Kentucky

May 12, 2021

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 wastewater treatment process at the Town Branch Wastewater Treatment Plant (Town Branch) facility located in Lexington, Fayette County, Kentucky. This facility was selected for inspection because it hasn't been inspected within the last five years under the RMP. The inspection, which was conducted on May 12, 2021, 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. Numerous documents were provided for review off-site. This report will provide a background of the facility and a listing of observations.

2.0 Background

The Town Branch facility is located in Lexington, Kentucky. The facility uses chlorine and sulfur dioxide for wastewater treatment purposes. The process is regulated as program level 3. According to facility records, the facility has a maximum of 40,000 pounds of chlorine and 16,000 pounds of sulfur dioxide on site. The sewage treatment processes at the facility are subject to the RMP requirements of 40 C.F.R. Part 68 and EPCRA Section 302. The background specifics are summarized as follows in Table 1.

TABLE 1: Inspection Information Summary

Inspection Team

Lead Inspector: Jordan Noles, EPA

Inspector: Om Devkota, EPA

Date of Facility Visit: May 12, 2021

Facility Identification

Name: Town Branch WWTP

Street Address: 301 Jimmy Campbell Drive

City: Lexington County: Fayette State: Kentucky Zip: 40504

EPA Facility ID No: 1000 0010 0623

Dun & Bradstreet (D&B) No: 618239958
Latitude: 38.063796
Longitude: -084.533402

Name, address, and phone of corporate parent company:
Owner/Operator: Lexington-Fayette Urban County Government
Mailing Address: 301 Jimmy Campbell Drive
City: Lexington State: Kentucky Zip: 40504
Phone: (859) 425-2413

Name, title, and email of person responsible for 40 C.F.R. Part 68 implementation:
Name: Danny Hyatt
Title: Plant Operations Supervisor
Phone: (859) 425-2413
Email: dhyatt@lexingtonky.gov

Name and title of emergency contact:
Name: Danny Hyatt
Title: Plant Operations Supervisor
Day phone: (859) 425-2413
24-hour Phone: (859) 621-2722
Email: dhyatt@lexingtonky.gov

Name and titles of stationary source personnel involved in site inspection (*accompanied site tours, provided documents and explanations*):
Name: Robin Wright
Title: Program Coordinator
Phone: (859) 425-2419
Email: rwright@lexingtonky.gov

Name: Danny Hyatt
Title: Plant Operations Supervisor
Phone: (859) 425-2413
Email: dhyatt@lexingtonky.gov

Note: This is not a union facility.

Date and Program Levels of Submitted Risk Management Plan

Date of initial submission: November 20, 2006
Date of most recent submissions: December 30, 2016

Process: Chlorine Storage
Process ID: 1000077018

Process: Sulfur Dioxide Storage
Process ID: 1000095666

Program Level as reported in RMP: 3
NAICS code: 22132 (Sewage Treatment Facilities)

3.0 Observations

The inspection of the Town Branch facility 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 included discussions with the facility representatives regarding a myriad of issues related to the operation of its chemical process, the facility’s RMP, a review of paperwork associated with the facility’s most recent Risk Management Plan, and a tour of the facility. An inspection in-brief and out-brief were conducted. There were no findings of note as a result of the inspection.

Inspection Report,

Prepared by:

Jordan Noles

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

July 08, 2021

Date

Approved by:

**JASON
DRESSLER**

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Date: 2021.07.08 08:26:56
-04'00'

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

July 08, 2021

Date