

United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report

C.B. Collier Water Treatment Plant

Gadsden, Alabama

February 13, 2025

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 ammonia refrigeration process at the C.B. Collier Jr water treatment plant facility located in Gadsden, Etowah County, Alabama. This facility was selected because it had not been inspected under the RMP in the last five years. The inspection, which was conducted on February 13, 2025, 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

C.B. Collier JR Water Treatment Plant facility is located in Gadsden Etowah County, Alabama. The facility uses chlorine (gas liquified by pressure) for treatment of the municipal water supply and irrigation systems on site. The process is regulated as program level 2. According to facility records, the facility has a maximum of 16,000 pounds of chlorine on site. The chlorine is stored in two different rooms, one being a main cylinder room where two 2,000 pound cylinders are in use at all times. The "storage room" as it is referred to, houses two 2,000 pound chlorine cylinders. There are four 150 pound chlorine cylinders also present on site which are kept caged and secured. The water treatment process at the facility is subject to the RMP requirements of 40 C.F.R. Part 68, which sets forth the list of regulated substances and thresholds, the petition process for adding/deleting substances to the list of regulated substances, the requirements for owners or operators of stationary sources concerning the prevention of accidental releases, and the State accidental release prevention programs approved under section 112(r). The background specifics are summarized as follows in Table 1.

TABLE 1: Inspection Information Summary

Inspection Team

Lead Inspector: Callie Sotolongo, EPA
Inspector: Justin Stark, EPA
Date of Facility Visit: February 13, 2025

Facility Identification

Name: C.B. Collier Water Treatment Plant
Street Address: 625 Albert Rains Boulevard
City: Gadsden County: Etowah State: Alabama Zip: 35901
EPA Facility ID No: 1000 0003 6169
Dun & Bradstreet (D&B) No: N/A
Latitude: 34.022166
Longitude: -085.987881

Name, address and phone of corporate parent company:
Owner/Operator: Gadsden Water Works and Sewer Board
Mailing Address: 515 Albert Rains Boulevard
City: Gadsden State: Alabama Zip: 35901
Phone: (256) 543-2884

Name, title, and email of person responsible for 40 C.F.R. Part 68 implementation:
Name: Michael Brookins
Title: Superintendent
Phone: (256) 543- 2884
Email: mbrookins@gadsdenwater.org

Name and title of emergency contact:
Name: Michael Brookins
Title: Superintendent
Day phone: (256) 312- 7465
24-hour Phone: (256) 312- 7465
Email: mbrookins@gadsdenwater.org

Name and titles of stationary source personnel involved in site inspection (*accompanied site tours, provided documents and explanations*):
Name: Daniel Clark
Title: Chief Water Plant Operator
Phone: (256) 485- 8348
Email: dclark@gadsdenwater.org

Name: Mike Lankford
Title: Assistant General Manager
Phone: (256) 312- 6275
Email: mlankford@gadsdenwater.org
Name: Michael Brookins
Title: Superintendent
Phone: (256) 543- 2884
Email: mbrookins@gadsdenwater.org

Note: This is not a union facility.

Date and Program Levels of Submitted Risk Management Plan

Date of initial submission: June 14, 1999
Date of most recent submissions: April 6, 2023
Process: Water Treatment Plant
Process ID: 1000130626
Program Level as reported in RMP: 2
NAICS code: 22131 (Water Supply and Irrigation Systems)

3.0 Observations

The inspection of the C.B. Collier Water Treatment Plant evaluated various sections of the RMP regulations (40 C.F.R. Part 68, Program Level 2) and the inspection checklist included in "Guidance for Conducting Risk Management Programs Inspections under Clean Air Act Section 112(r)." The inspection included an opening conference where EPA inspectors reviewed documents associated with the facility's Risk Management Plan. The discussion was followed by a tour of the facility's water treatment area. An inspection out-brief was conducted where EPA inspectors requested additional documents for review off-site and described their observations. Observations from the RMP inspection at the C.B. Collier Water Treatment Plant are discussed below:

- At the time of the inspection there were no areas of concern to be found. All required information was provided prior to the inspection via email on 01/29/2025. Requested information was also provided via email for review on 02/14/2025.

Inspection Report,

Prepared by:

CALLIE

SOTOLONGO

Digitally signed by
CALLIE SOTOLONGO

Date: 2025.03.28

03/05/2025

Callie Sotolongo, Inspector in Training

Date

South Air Enforcement Section

U.S. EPA Region 4

Approved by:

TODD GROENDYKE

Digitally signed by TODD
GROENDYKE

Date: 2025.03.26 11:15:13 -04'00'

Todd Groendyke, Section Chief

Date

South Air Enforcement Section

U.S. EPA Region 4