

United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report

Athens Water Treatment Plant

Elkmont, Alabama

August 22nd, 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 ammonia refrigeration process at the Athens Water Treatment Plant facility located in Elkmont, Limestone County, Alabama. This facility was selected because it had never been inspected under the RMP. The inspection, which was conducted on August 22, 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

Athens Water Treatment Plant facility located in Elkmont, Limestone 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 20,000 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 background specifics are summarized as follows in Table 1.

TABLE 1: Inspection Information Summary

Inspection Team

Lead Inspector-In-Training: Callie Sotolongo, EPA

Inspector: Jordan Noles, EPA

Date of Facility Visit: August 22, 2024

Facility Identification

Name: Athens Water Treatment Plant

Street Address: 15575 Section Line Road
City: Elkmont County: Limestone State: Alabama Zip: 35620
EPA Facility ID No: 1000 0023 7996
Dun & Bradstreet (D&B) No: 26600134
Latitude: 34.880465
Longitude: -87.043093

Name, address and phone of corporate parent company:

Owner/Operator: City of Athens Utilities

Mailing Address: PO Box 1089

City: Athens State: Alabama Zip: 35612

Phone: (256) 232-1440

Name, title, and email of person responsible for 40 C.F.R. Part 68 implementation:

Name: Brian Daniels

Title: Superintendent

Phone: (256)- 233-8773

Email: bdaniel@athens-utilities.com

Name and title of emergency contact:

Name: Brian Daniels

Title: Superintendent

Day phone: (256) 233-8773

24-hour Phone: (256) 497-7856

Email: bdaniel@athens-utilities.com

Name and titles of stationary source personnel involved in site inspection (*accompanied site tours, provided documents and explanations*):

Name: Brian Daniels

Title: Superintendent

Phone: (256) 233- 8773

Email: bdaniel@athens-utilities.com

Name: Tim Norman

Title: Facility Employee

Phone: (256) 233- 8773

Email: tnorman@athens-utilities.com

Note: This is not a union facility.

Date and Program Levels of Submitted Risk Management Plan

Date of initial submission: August 19, 2019

Date of most recent submissions: June 13th, 2024

Process: Water Treatment Plant

Process ID: 1000143661

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CAA 112 (r), Risk Management Program, Inspection Report

Program Level as reported in RMP: 2
NAICS code: 22131 (Water Supply and Irrigation Systems)

3.0 Observations

The inspection of the Athens 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 Athens Water Treatment Plant are discussed below:

1. 40 C.F.R. § 68.58(a) requires the owner or operator to certify that they have evaluated compliance with the provisions of this subpart, at least every three years to verify that the procedures and practices developed under this subpart are adequate and are being followed.
 - At the time of the inspection, the 2019 and 2022 compliance audits were identical, with no edits having been done between the two. This includes recommendations and actions to be taken based on the compliance audit findings. The 2022 compliance audit was not evaluated with the provisions of Subpart C and was not updated.
2. 40 C.F.R. § 68.93(a) requires the owner or operator to coordinate annually with local emergency planning and response organizations to address changes: At the stationary source; in the stationary source’s emergency response and/or emergency action plan; and/or in the community emergency response plan.
 - At the time of the inspection, the facility did not coordinate annually with local emergency planning and response organizations for the previous five years. There were no records available at the time of the inspection to suggest otherwise. There were no records received after the inspection to show coordination with local emergency planning organizations.
3. 40 C.F.R. § 68.71(c) requires the owner or operator to ascertain that each employee involved in operating a process has received and understood the training required by this paragraph. The owner or operator shall prepare a record which contains the identity of the employee, the date of training, and the means used to verify that the employee understood the training.
 - At the time of the inspection, the facility did not have adequate documentation of employee training to include annual and refresher courses for all personnel. There was no documentation to show annual refresher courses after the inspection was conducted and documents were reviewed.

Inspection Report,

Prepared by:

CALLIE
SOTOLONGO

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10/18/2024

Date

Callie Sotolongo, Inspector-In-Training
South Air Enforcement Section
U.S. EPA Region 4

JORDAN NOLES

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

Date

Approved by:

TODD GROENDYKE

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Todd Groendyke, Section Chief
South Air Enforcement Section
U.S. EPA Region 4

Date