EPA United States Environmental Protection Agency

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	2/9-10/2026	
Media Program:	Air	
Regulatory Program(s)	Clean Air Act (CAA) Section 112(r) and 40 Code of Federal Regulations (C.F.R.) Part 68 Chemical Accident Risk Management Plan (RMP)	
Company Name:	**Clear Lake City Water Authority**	
Facility Name:	**Robert T. Savely Water Reclamation Facility**	
Facility Physical Location:	14210 Middlebrook Drive	
(city, state, zip code)	Houston, Texas 77058	
Mailing address:	900 Bay Area Boulevard	
(city, state, zip code)	Houston, Texas 77058	
County/Parish:	Harris County	
Facility Phone Number	281-488-2400	
Facility Contact:	Fank Elliott	Wastewater Superintendent
	f.elliott@clcwa.org	
FRS Number:	110000761391	
Identification/Permit Number:	N/A	
Media Identifier Number:	RMP 1000 0005 3283	
NAICS:	22132 - Sewage Treatment Facilities	
SIC:	N/A	

Personnel participating in inspection:		
Sherronda Phelps	US EPA	CAA Inspector
Frank Elliott	CLCWA	Superintendent
Olga Mireles	CLCWA	Administrative Assistant
Edward Streich	LAN	Authority Engineer

EPA Lead Inspector Signature/Date	SHERRONDA PHELPS Digitally signed by SHERRONDA PHELPS Date: 2026.04.02 09:12:46 -05'00'	
	Sherronda Phelps	Date
Supervisor Signature/Date	KAYLA BUCHANAN Digitally signed by KAYLA BUCHANAN Date: 2026.04.01 08:23:01 -05'00'	
	Kayla Buchanan	Date

6ENFORM-019-R9 (02/27/2025)

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector, Sherronda Phelps ("I"), arrived at the Clear Lake Clean Water Authority/Robert T. Savely Reclamation Water Facility (CLCWA) at 10:30 AM on 02/09/2026 for an announced inspection. I met Mr. Frank Elliott and other CLCWA representatives at the Opening Conference. I presented my credentials to all present and informed them that this was an EPA inspection to determine compliance with CAA Section 112(r)(1) and 112(r)(7). The scope of the inspection was a partial compliance evaluation (PCE) and included evaluation of the compliance of the facility with 40 C.F.R. Subpart 68 – Chemical Accident Prevention Provisions. An employee representative was invited to participate in the inspection; however, this site is a non-union facility.

FACILITY DESCRIPTION

According to the facility's executive summary, the Robert T. Savely Water Reclamation facility is currently 10.0 million gallons per day plant. This facility is an activated sludge wastewater treatment plant operating in conventional mode. Chlorine gas is utilized to disinfect a portion of the treated effluent and ultraviolet waves are used to disinfect the remaining flow. The only chemical(s) meeting the threshold quantity as determined under 40 CFR § 68.115 is chlorine. The facility employs approximately 25 full-time employees (FTE's).

Section II - OBSERVATIONS

The initial documentation review began in person with Frank Elliott (Wastewater Superintendent), and Edward Streich (Authority Engineer). See sign-in sheets for the personnel who participated during the inspection (Appendix A). A facility site tour took place on February 10, 2026, to observe the flow of the process operation.

40 C.F.R. Part 68 – CHEMICAL ACCIDENT PREVENTION PROVISION

Subpart A – General

40 C.F.R. § 68.10 Applicability – The Robert T. Savely Water Reclamation facility is a stationary source that has more than a threshold quantity of regulated substance in their process. The last submittal was made June 26, 2024, due to the five-year resubmission date. The facility is an RMP Program 2 facility. The facility is subject to the Occupational Safety and Health Administration's (OSHA) Emergency Action Plans (EAP) Standard (29 CFR § 1910.38).

40 C.F.R. § 68.12 General requirements – The facility submitted their most recent RMP submission on June 26, 2024. The regulated substance(s) chlorine is the regulated substances listed over the threshold quantity for the RMP Program Level 2 process.

40 C.F.R. § 68.15 Management – Robert T. Savely developed a management system to oversee the implementation of the risk management program elements. The facility provided an organizational chart that outlined the positions to implement the individual elements of the RMP, as required by this subpart.

Subpart B – Hazard Assessment

40 C.F.R. § 68.20 Applicability – Robert T. Savely operates an RMP program level 2 process which is subject to this subpart and thus is required to prepare a worst-case release scenario analysis and complete the five-year accident history. I reviewed the documentation provided to make this analysis and identified no areas of concern with this subpart.

40 C.F.R. § 68.22 Offsite Consequence Analysis Parameters – Robert T. Savely employed the parameters specified by EPA in this rule by using the RMP*Comp™ software. I reviewed the offsite consequence analysis and supporting documentation to assure the data was accurate and correct.

40 C.F.R. § 68.25 Worse-case release scenario analysis – Robert T. Savely identified and analyzed at least one worst-case scenario in its Program 2 processes using the RMP* Comp™ software, thus meeting the requirements of the regulation.

40 C.F.R. § 68.28 Alternative Release Scenario Analysis – Robert T. Savely identified and analyzed at least one alternative release scenario in its Program 2 processes using the RMP* Comp™ software, thus meeting the requirements of the regulation.

40 C.F.R. § 68.30 Defining offsite impacts- Population – Robert T. Savely used the most current Census Bureau population data and the distances to endpoints, as specified in the regulation, to calculate the population numbers reported in their RMP.

40 C.F.R. § 68.33 Defining offsite impacts- Environment – Robert T. Savely used US Geological Survey maps data to determine the environmental receptors and the distances to endpoints.

40 C.F.R. § 68.36 Review and update - Robert T. Savely understands documentation associated with the worst-case scenarios that should be updated and reviewed at least every five years and are anticipating a review in 2029.

40 C.F.R. § 68.39 Documentation - Robert T. Savely operates a RMP program level 2 process which is subject to this subpart and thus is required to prepare a worst-case release scenario analysis and complete the five-year accident history. I reviewed the documentation provided to make this analysis and identified no areas of concern with information pertaining to this subpart to include the Offsite Consequence Analysis (OCA) data. The facility used the EPA Model RMP*Comp™.

40 C.F.R. § 68.42 Five-year accident history - Robert T. Savely reported a chlorine release that occurred in April of 2024 during a cylinder change out. EPA reviewed records provided by the facility during the onsite inspection and determined that Robert T. Savely investigated and documented the incidents and retrained its employees in June of 2024.

Subpart C – Program 2 Prevention Program

40 C.F.R. § 68.48 Safety information - I reviewed the safety information associated with the RMP covered process at Robert T. Savely. It is all maintained as required by this subpart. There have been no major changes that have occurred that made the information inaccurate. No areas of concern were noted during the inspection.

40 C.F.R. § 68.50 Hazard Review – The most recent Hazard Review was conducted in June of 2024. Robert T. Savely has a program in place to ensure that hazards associated with the covered process are identified and controlled. The facility primarily uses the "What If" and Checklist methods to perform these evaluations. The next review is due in the year 2029. Robert T. Savely completed any action items generated from the review as scheduled.

40 C.F.R. § 68.52 Operating procedures – Robert T. Savely developed and implemented written operating procedures that provide instructions or steps for conducting activities associated with the covered process, consistent with the safety information. The SOPs reviewed addressed: the steps for each operating phase (initial and normal startup, normal operations, temporary operations, emergency operation and shutdown, normal shutdown, and startup following a turnaround or after emergency shutdown); the consequences of deviation and mechanisms to correct and/or avoid deviation; safety and health considerations; the properties of, and hazards presented by, chemicals used in the process; the precautions necessary to prevent exposure; quality control for raw materials; and, the safety systems and their functions. Robert T. Savely certified that the operating procedures were current, accurate, and that the procedures were reviewed as often as necessary, as required by this subpart, and used a single certification document for operating procedures annually. Hard copies of the operating procedures are available in control room for operators. There is also electronic access available via their Sharepoint site. No areas of concern were identified with this subpart.

40 C.F.R. § 68.54 Training - I reviewed the facility's training program procedure and employee training records. The facility's training program ensured that each employee presently operating the covered process, and each employee newly assigned to a covered process are trained or tested to qualify as competent in an overview of the process and in the operating procedures that pertain to their duties. In addition, operator(s) must go through a training program, which includes the following: on-the-job training, a testing process that is written and computer-based, and a series of field demonstration tests. I reviewed several individuals' training documents. Robert T. Savely is required to provide refresher training every three years, and more often, if necessary, to each employee involved in operating a process to ensure that the employee understands and adheres to the current operating procedures of the process. I requested documentation to ensure that operators understood the training. The facility provided sufficient documentation for the means of verification that the operators understood the training.

40 C.F.R. § 68.56 Maintenance - I reviewed mechanical integrity records for randomly selected inspections of RMP covered process equipment and the written procedure for maintaining the integrity of the process. EPA requested a list of past due/overdue MI inspections. There was none to populate from that query. EPA reviewed records on Robert T. Savely's critical equipment list and their historical inspection details. The facility utilizes appropriate equipment surveillance and preventative maintenance activities for the process equipment. There were no areas of concern identified.

40 C.F.R. § 68.58 Compliance Audits – I reviewed two of Robert T. Savely's most recent compliance audit reports from 2023 and 2026 where they evaluated compliance with the provisions of this subpart. Both compliance audits were conducted by at least one person knowledgeable in the process. The audits are conducted in-house and certified as required by regulation. No areas of concern were noted during the inspection.

40 C.F.R. § 68.60 Incident Investigation – I reviewed a list of incident reports/investigations for all incidents, which resulted in, or could have reasonably resulted in, a catastrophic release of a regulated substance for the last five years. All incident investigations were conducted as required per the subpart and training was provided as necessary to address any updates or changes to the procedures.

Subpart D – Emergency Response

40 C.F.R. § 68.90 Applicability – Robert T. Savely is a "non-responding" stationary source in case of an accidental release of a regulated substance, therefore, the facility need not comply with the requirements of part 68.95.

40 C.F.R. § 68.93 Emergency Response Coordination Activities – Robert T. Savely coordinates with the local emergency planning and response organizations to ensure that local response organization are aware of the regulated substances of the stationary source. I reviewed Robert T. Savely coordination notification documentation which included the names of the individuals involved, their contact information, dates of the coordination activities, and the nature of the coordination activities. Robert T. Savely coordinates with the local authorities in the city at least annually. I reviewed the facility's Emergency Response Drill forms. The facility conducts drills on a quarterly basis that consist of exercises such as: air monitoring, entry control, medical checks, decontamination, and HAZMAT immediate control.

40 C.F.R § 68.96 Emergency response exercises – As part of coordination with local emergency response officials required by § 68.93, Robert T. Savely consult with officials to establish an appropriate frequency for tabletop exercises. In addition, Robert T. Savely provided notification exercises dates and indicated that notification exercises are conducted on an annual basis.

Subpart E – Risk Management Plan

40 C.F.R. § 68.190 Updates – There have been no recent additions or upgrades to the unit that would have triggered an update to the Risk Management Plan.

40 C.F.R. § 68.195 Required corrections -The next RMP re-submission is due by June 26, 2029, unless an update or correction is required by 40 C.F.R. § 68.190 and § 68.195.

Section III – AREAS OF CONCERN

I observed no areas of concern at the time of the inspection.

Closing Conference

EPA Region 6 inspector, Sherronda Phelps, conducted a closing conference at Robert T. Savely facility at 11:00 AM on February 10, 2026, for the inspection. During the closing conference, I reviewed the elements of the RMP covered during the inspection, field questions from facility personnel, and provided information about the next steps in the inspection process.

Section IV – FOLLOW UP

No additional information was requested or received by EPA after exiting the Facility on February 10, 2026

Section V – LIST OF APPENDICES (Appendix 1 is classified as a Sensitive Appendices and is not included in the online published inspection report. Sensitive Appendices may include appendices that will not be posted but are not explicitly CBI. These could include Personally Identifiable Information (PII) or Homeland Security sensitive information.)

Appendix 1 – Opening and closing conference sign-in sheets