United States Environmental Protection Agency

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	June 3-6, 2025	
Media Program:	Air	
Regulatory Program(s)	Clean Air Act (CAA) § 112(r) and 40 Code of Federal Regulations (C.F.R.) Part 68 Chemical Accident Risk Management Plan (RMP)	
Company Name:	**City of Victoria, Texas**	
Facility Name:	**City of Victoria Surface Water Treatment Plant**	
Facility Physical Location:	2902 N. Bluff Street	
(city, state, zip code)	Victoria, Texas 77901	
Mailing address:	700 Main Center	
(city, state, zip code)	Victoria, Texas	
County/Parish:	Victoria	
Facility Phone Number	361-485-3416	
Facility Contact:	Kevin Post	Surface Water Treatment Plant Manager
	kpost@victoriatx.gov	
FRS Number:	110005974204	
Identification/Permit Number:	Air Permit Number: 21539	
Media Identifier Number:	RMP 100000175464	
NAICS:	42269 Other Chemical and Allied Products Wholesalers/ 42469 Other Chemical and Allied Products Merchant Wholesalers	
SIC:	N/A	
Personnel participating in inspection:		
Julia Torres	EPA Region 6 ECDAC	RMP Inspector
Charese Simpson	EPA Region 6 ECDAC	RMP Inspector
Kevin Post	Victoria SWTP	Victoria SWTP Manager
Gordon Williams	Victoria SWTP	Process Chemistry Product Manager
Brian Haney	Victoria SWTP	Victoria Operations and Maintenance Manager
Gregory Rodriguez	Victoria SWTP	Victoria Risk Manager
EPA Lead Inspector Signature/Date	JULIA TORRES Digitally signed by JULIA TORRES Date: 2025.09.03 16:13:34 -05'00'	
	Julia Torres	Date
Supervisor Signature/Date	KAYLA BUCHANAN Digitally signed by KAYLA BUCHANAN Date: 2025.09.03 16:50:10 -05'00'	
	Kayla Buchanan	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

United States Environmental Protection Agency ("EPA") Region 6, inspectors Julia Torres, and Charese Simpson ("the EPA team", "we") arrived at the City of Victoria Surface Water Treatment Plant ("Victoria SWTP") facility, operated by the City of Victoria, in Victoria, Texas at 8:30 AM on June 3, 2025, for an announced inspection. EPA met with and presented credentials to Kevin Post (Victoria SWTP Manager), Gordon Williams (Victoria SWTP Chief Operator) and their Environmental and Maintenance team at the opening conference. I, Julia Torres, informed them that this was an EPA inspection to evaluate compliance with the requirements of the Chemical Accident Prevention Provisions of Title 40 of the Code of Federal Regulations ("C.F.R.") Part 68 under Clean Air Act ("CAA") § 112(r). An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 C.F.R. § 68.115, shall comply with the requirements of the CFR Part 68. Employee representatives were invited to participate in the inspection. The facility does not have union representation.

FACILITY DESCRIPTION

Victoria SWTP is located at 2902 N. Bluff Rd. Victoria, Texas. The facility is in operation 24 hours a day, seven (7) days a week and currently has twelve (12) full time employees working in two shifts, 7AM to 7PM, and 7PM to 7AM. Victoria SWTP stores more than the threshold quantity for the Risk Management Plan ("RMP") regulated substance chlorine. The facility pumps raw water from the Guadalupe River and treats it to pump to the city of Victoria. As the water enters from the river, it is treated with chlorine dioxide and sent into the rapid mix basin, where it is then treated with zinc orthophosphate and ferrous chloride. The water then goes into the flocculation basin where it discharges into the sedimentation basin. From the sedimentation basin, the water is disinfected with chlorine as it travels upstream through filters and is disinfected once more with ammonium sulfate. The facility stores the chlorine in their chlorination building in 1-ton cylinders and stores 24,000 gallons of chlorine for a total of twelve (12) 1-ton cylinders of chlorine for their disinfection process.

Victoria SWTP reported one (1) Program Level 2 covered process subject to the requirements of EPA's RMP regulations in its most recent RMP submission, dated January 18, 2024.

Section II - OBSERVATIONS

The documentation review began on Tuesday, June 3, 2025, with the Victoria SWTP personnel as listed on the sign in sheets, **see Appendix 1.**

On Wednesday, June 4, 2025, inspectors were accompanied by Kevin Post and Gordon Williams to conduct a tour of the site, specifically the Chlorination building. EPA observed the covered process, emergency equipment, and the control room. Victoria SWTP operators can access standard operating procedures (SOPs) through a hard copy.

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

Subpart A – General

40 C.F.R. § 68.10 Applicability – Victoria SWTP has more than a threshold quantity of the regulated toxic substance chlorine as listed in 40 C.F.R. § 68.130 and is subject to the provisions of the Chemical Accident Prevention Program requirements. Victoria SWTP has a CAA Title V Air Operating Permit, Number 157096 and a North American Industry Classification System (NAICS) code of 22131- Water Supply and Irrigation Systems. Victoria SWTP is not subject to the Occupational Safety and Health Administration (OSHA) process safety management standard, 29 C.F.R. § 1910.119, and is an EPA RMP Level 2 facility.

40 C.F.R. § 68.12 General requirements – Victoria SWTP submitted their most recent 5-year Risk Management Plan submission on January 18, 2024. The Risk Management Plan listed chlorine as their RMP Program 2 regulated substance present in processes with amounts greater than the threshold quantity, prescribed in the standard, and therefore classified as by rule.

40 C.F.R. § 68.15 Management – Victoria SWTP has a management system to oversee the implementation of the RMP Program elements. The EPA team reviewed the Victoria SWTP organizational chart that outlined the positions for the implementation of the individual elements of the RMP.

Subpart B – Hazard Assessment

40 C.F.R. § 68.20 Applicability – The owner or operator of a stationary source subject to this part shall prepare a worst-case release scenario analysis as provided in § 68.25 of this part and complete the five-year accident history as provided in § 68.42. The EPA team reviewed the worst-case release scenario analysis and a five-year accident history in the RMP.

40 C.F.R. § 68.22 Off-Site Consequence Analysis ("OCA") Parameters – Victoria SWTP used parameters required in this part to calculate toxic worst-case and alternative release scenarios in their Offsite Consequence Analysis, completed April 16, 2020. Victoria SWTP utilizes RMP*Comp™ as the technique for modeling the release scenarios. For the worst-case and alternative case scenarios involving the toxic chemicals, the facility used the endpoints provided in Appendix A of 40 C.F.R. Part 68, appropriate wind speeds and stability classes, ambient temperatures and humidity values, values for height of the release, and surface roughness values for the release scenario analyses.

40 C.F.R. § 68.25 Worst-case Release Scenario (WCS) Analysis – The EPA team reviewed the WCS for a release of chlorine. Victoria SWTP analyzed and reported in the RMP their worst-case release scenario, estimated to create the greatest distance to endpoint utilizing RMP*Comp™, and resulting from an accidental release of a regulated toxic substance from a covered process under worst-case conditions. Victoria SWTP failed to identify the greatest amount held in a single vessel for their determination of the worst-case release quantity. The worst-case scenario did not identify the greatest amount held in a single vessel to estimate the greatest distance to endpoint [**AOC 1 -§68.25**].

40 C.F.R. § 68.28(a) Alternative Release Scenario Analysis – The EPA team reviewed the alternative release scenario for chlorine. Victoria SWTP analyzed and reported an alternative release scenario for chlorine in the RMP. Victoria SWTP utilizes RMP*Comp™ to calculate the distance to endpoint.

40 C.F.R. § 68.30 Defining Offsite Impacts-Population – Victoria SWTP stated they used the most current census bureau population data made available in the Maptitude software to calculate the population numbers reported in their RMP.

40 C.F.R. § 68.33 Defining Offsite Impacts -Environment –The EPA team reviewed the OCA document with associated maps. Victoria SWTP identified environmental receptors in the distance to the endpoint or in the vicinity of the facility, as appropriate, in the area maps used for the modeling.

40 C.F.R. § 68.36 Review and update – Victoria SWTP most recent off-site consequence analyses were last reviewed in January 2024 during the last RMP re-submission. Victoria SWTP ensures that this documentation is reviewed and updated at least once every five years.

40 C.F.R. § 68.39 Documentation – Victoria SWTP operates one (1) RMP Program level 2 process subject to this subpart and are required to prepare a worst-case release scenario analysis and complete the five-year accident history. The EPA team reviewed the worst-case and alternative-case scenarios provided. For the worst-case and alternate release scenarios, the substance selected as worst-case, and the rationale for selection was included. RMP* Comp™ was used to verify the distance to endpoint for each scenario.

40 C.F.R. § 68.42 Five-year accident history – The EPA team reviewed the five-year accident history for Victoria SWTP for 2020 – 2024. The EPA team reviewed one (1) incident reported from 2020 and requested information for a 2024 incident reported by the press.

Subpart C – Program 2 Prevention Program

40 C.F.R. § 68.48 Safety Information – Victoria SWTP maintains a variety of technical documents used to maintain safe operation of the processes. These documents address chemical properties and associated hazards, limits for key process parameters and specific chemical inventories, and equipment design basis/configuration information. Chemical-specific information, including exposure hazards and emergency response/exposure treatment considerations, is provided in safety data sheets (SDSs). In addition, the facility documented safety-related limits for specific process parameters (e.g., temperature, level, composition) in the operation manuals.

40 C.F.R. § 68.50 Hazard Review – EPA reviewed Victoria SWTP most recent hazard analysis, conducted in 2024, along with the HA Policy and Revalidation Policy. Victoria SWTP has a comprehensive PHA program to ensure that hazards associated with the various processes are identified and controlled. Within this program, the covered process is systematically examined to identify hazards and ensure that adequate controls are in place to manage those hazards. Victoria SWTP primarily used the checklist technique for the most recent PHA to perform these evaluations. The analyses conducted used a team of people who have operating, maintenance, and engineering expertise.

40 C.F.R. § 68.52 Operating procedures – Victoria SWTP maintains written procedures that address various modes of operations, such as unit startup, normal operations, temporary operations, emergency shutdown, normal shutdown, and initial startup of a new process. The operating procedures contain safe operating conditions and limits for each production area as required which is consistent to process safety information. These procedures can be used as a reference by experienced operators and provide a basis for consistent training of new operators. The written operating procedures are readily available to operators while in the control room to use as necessary to safely perform their job tasks.

40 C.F.R. § 68.54 Training – Victoria SWTP provided the EPA team with their Training Policy. Victoria SWTP implemented a training program for all employees involved in operating a process. All operations

employees receive basic training for the facility operations. Victoria SWTP operators complete annual written refresher training for Safe Operation and Maintenance of Cylinder Hoist Training and Disinfection Process Operating Procedures. We reviewed the training records of six (6) selected operators associated with the RMP covered processes for the past five years. Three (3) operators were missing their 2024 annual refresher training for Safe Operation of Cylinder Hoists, two (2) operators were missing their 2024 annual training for the Disinfection Process, and one (1) operator was missing their 2021 annual training for the Disinfection Process **[AOC 3 -§ 68.54(b)]**. See **Appendix 3**.

40 C.F.R. § 68.56 Maintenance – The EPA team reviewed the written policy Victoria SWTP established to maintain the ongoing integrity of the process equipment. Victoria SWTP uses the maintenance procedures and frequencies found in the manufacturer equipment manuals. The basic aspects of this program include performing and documenting inspections and tests, correcting identified deficiencies, and applying quality assurance measures. Victoria SWTP conducts inspections on critical pieces of equipment including inside the chlorination building. Victoria SWTP provided equipment manuals as a reference for the maintenance procedures and frequencies. The manuals only referenced the procedures and frequency of inspection for one of the eight pieces of critical equipment. EPA reviewed inspections of critical equipment for the last 5 years. The Critical Equipment Inspection for the process equipment lists the frequency of inspections completed on the process equipment as monthly (M), weekly (W), and daily (D). EPA also reviewed the Chlorination Process Preventative Maintenance Checklists. The checklist completed in the month of May 2025 was missing daily inspections for May 13-19, 2025, and the critical equipment inspection form was missing inspections for May 13, 17, and 18, 2025 **[AOC 4 -§ 68.56(d)]**. See **Appendix 4**.

40 C.F.R. § 68.58 Compliance Audits – The EPA team reviewed Victoria SWTP's two most recent compliance audits, conducted in 2022 and 2020. Both compliance audits provided were conducted by at least one person knowledgeable in the process. Victoria SWTP assigns audit findings to the appropriate department responsible for implementing the change.

40 C.F.R. § 68.60 Incident investigation – Victoria SWTP had two (2) incidents that had occurred at the facility within the last five (5) years. Victoria SWTP provided a report of a chlorine dioxide leak that occurred on December 16, 2024, and a chlorine release that occurred on April 16, 2020. The chorine release resulted in an exposure to one (1) employee and the chlorine dioxide leak led to a small grass fire. See **Appendix 5.**

Subpart E – Emergency Response

40 C.F.R. § 68.90 Applicability – Victoria SWTP is designated as a non-responding stationary source in case of an accidental release of a regulated substance; therefore, the facility shall comply with the requirements of 40 C.F.R. § 68.93 and 40 C.F.R. § 68.96.

40 C.F.R. § 68.93 Emergency response coordination activities – Victoria SWTP coordinated response needs with local emergency planning and response organizations for 2022 & 2023**.** Victoria SWTP notified the LEPC of a coordination activity in 2024, which the LEPC did not attend.

40 C.F.R. § 68.96 Emergency response exercises – As part of coordination with local emergency response officials required by §68.93, Victoria SWTP provided EPA with documentation of an emergency response exercise completed with officials to establish an appropriate frequency for field exercises in 2024.

Subpart G – Risk Management Plan

40 C.F.R. § 68.150 Submission – Victoria SWTP submitted their 5-year update to their RMP on January 18, 2024. The re-submission was within the 5-year timeframe as required by 40 C.F.R. § 68.150.

40 C.F.R. § 68.160 Registration – Victoria SWTP included in their RMP all regulated substances present at the site above their designated threshold quantity as required by 40 C.F.R. § 68.160.

40 C.F.R. § 68.190 Updates – A Victoria SWTP's RMP submittal was on January 18, 2024, and the previous submittal for this facility was on June 4, 2019.

SECTION III - AREAS OF CONCERN

AOC 1 – 40 C.F.R § § 68.25 (b)(1) Worst-case release scenario analysis. *Determination of worst-case release quantity. The worst-case release quantity shall be the greater of the following: (1) For substances in a vessel, the greatest amount held in a single vessel, taking into account administrative controls that limit the maximum quantity.*

Victoria SWTP failed to identify the greatest amount held in a single vessel for their determination of the worst-case release quantity. EPA reviewed the offsite consequence analysis, which included the worst-case and alternative case release scenarios for a release of chlorine. The description of the WCS for chlorine failed to identify the vessel used in the determination of the WCS. The WCS description also failed to specify whether the scenario was considering the release of chlorine as a toxic gas or toxic liquid.

AOC 2 – 40 C.F.R. § 68.54 (b) Training. *Refresher training shall be provided at least every three years, and more often if necessary, to each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process. The owner or operator, in consultation with the employees involved in operating the process, shall determine the appropriate frequency of refresher training.*

Victoria SWTP failed to provide refresher training at least every three (3) years. The EPA team reviewed the training records for five (6) operators involved in the process. The training requires annual refresher training for complete annual refresher training for Safe Operation and Maintenance of Cylinder Hoist Training and Disinfection Process Operating Procedures. Three (3) operators were missing their 2024 annual refresher training for Safe Operation of Cylinder Hoists, two (2) operators were missing their 2024 annual training for the Disinfection Process, and one (1) operator was missing their 2021 annual training for the Disinfection Process. See **Appendix 3**.

AOC 3 -40 C.F.R. § 68.56(d) Maintenance. *The owner or operator shall perform or cause to be performed inspections and tests on process equipment. Inspection and testing procedures shall follow recognized and generally accepted good engineering practices. The frequency of inspections and tests of process equipment shall be consistent with applicable manufacturers' recommendations, industry standards or codes, good engineering practices, and prior operating experience.*

Victoria SWTP failed to maintain the frequency of testing procedures on their critical equipment list. EPA reviewed the Critical Equipment Inspection Form and Chlorination Process Preventative Maintenance

Checklists. These inspections and maintenance were to be completed daily according to their Critical Equipment Inspection Form. The form was missing inspections for May 13, 17, and 18, 2025, and the checklist was missing their checks for May 13-19, 2025. See **Appendix 4**.

Section IV – FOLLOW UP

I requested supplemental documentation be downloaded to the EPA designated SharePoint site for review by June 13, 2025, which the facility partially provided July 2, 2025, and July 7, 2025.

Section V – LIST OF APPENDICES

The Appendices are not included in the online published inspection report. CBI Appendices include documents that are claimed CBI by the facility. 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
- **Appendix 2:** Walk through photos
- **Appendix 3:** Annual refresher training for Safe Operation and Maintenance of Cylinder Hoist Training and Disinfection Process Operating Procedures for 2020-2025
- **Appendix 4:** Maintenance policy, Critical Equipment Inspection Form for May 2025, and Chlorination Process Preventative Maintenance Checklists for May 2025
- **Appendix 5:** April 2020 and December 2024 Incident Forms