EPA United States Environmental Protection Agency

Region 6 Compliance Assurance and Enforcement Division

INSPECTION REPORT

Inspection Date(s):	03/19/2018		
Media:	Air		
Regulatory Program(s)	RMP		
Company Name:	**North Texas Municipal Water District**		
Facility Name:	**Rowlett Creek Regional Wastewater Treatment Plant (WWTP)**		
Facility Physical Location:	1401 Los Rios Road		
(city, state, zip code)	Plano, TX 75074		
Mailing address:	P.O. Box 2408		
(city, state, zip code)	Wylie, TX		
County/Parish:	Collin County		
Facility Contact:	Brent Lorance	Rowlett Creek Supervisor	
	blorance@ntmwd.com		
FRS Number:	110000505953		
Identification/Permit Number:	N/A		
Media Number:	RMP # 100000147094		
NAICS:	22132		
SIC:			

Personnel participating in inspection:			
Joshua Boyd	Rowlett Creek Regional WWTP	Chief Operator	972-424-2722
Brent Lorance	Rowlett Creek Regional WWTP	Rowlett Creek Supervisor	972-424-2722
Michael Walker	Rowlett Creek Regional WWTP	Senior Environmental Health & Safety Specialist	469-316-5704
Joshua Hathaway	Rowlett Creek Regional WWTP	Environmental Compliance Manager	214-223-6481
Kayla Buchanan	Environmental Protection Agency	Inspector	214-665-6480

EPA Lead Inspector Signature/Date	Kayla Buchanan	5/15/18 Date
Supervisor Signature/Date	Samuel Tates	5/15/2018 Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

I, EPA Region 6 inspector Kayla Buchanan, arrived at the North Texas Municipal Water District's Rowlett Creek Regional WWTP (North Texas Rowlett) at 9:00 AM on March 19th, 2018, for an announced inspection. I met with several representatives of the North Texas Municipal Water District at the Opening Conference ***(see Appendix 1).*** I presented my credentials to all attendees of the opening conference and informed them that this was an EPA inspection to determine North Texas Rowlett's compliance with Clean Air Act Sections 112(r)(1) and 112(r)(7). The scope of the inspection was a partial compliance evaluation of the facility pursuant to 40 CFR Subpart 68 – Chemical Accident Prevention Provisions. The facility does not have union representation.

FACILITY DESCRIPTION

North Texas Rowlett is an entity that treats wastewater in the North Texas area. It is located at 1401 Los Rios Road, Plano, TX 75074. The facility is owned and operated by the North Texas Municipal Water District (NTMWD) and employs twenty-two (22) full time employees.

Section II – OBSERVATIONS

On Monday, March 19th 2018, I conducted a walk-through of the facility and was accompanied by Josh Boyd (Chief Operator) and Brent Lorance (Rowlett Creek Supervisor) to observe the covered processes, equipment, operations, and emergency equipment.

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

Subpart A – General

40 C.F.R. § 68.10 Applicability – North Texas Rowlett is a non-Title V stationary source that has more than a threshold quantity of chlorine and sulfur dioxide, both of which are regulated substances, in its process streams; therefore, these regulations are applicable. North Texas Rowlett re-submitted a Risk Management Plan (RMP) on April 18, 2016, that described the processes containing regulated chemicals held at more than a threshold quantity. This facility is not subject to the Occupational Safety and Health Administration's (OSHA) Process Safety Management (PSM) Standard (29 CFR 1910.119), categorizing them as a Program 2 facility.

40 C.F.R. § 68.12 General requirements - I reviewed the April 18, 2016, re-submission of North Texas Rowlett's RMP and it listed the toxic chemicals for its Program 2 process.

40 C.F.R. § 68.15 Management – I reviewed North Texas Rowlett's management system ***(see Appendix 2).*** The facility assigned a qualified person or position that has the overall responsibility for the development, implementation, and integration of the risk management program elements.

Subpart B – Hazard Assessment

40 C.F.R. § 68.20 Applicability – North Texas Rowlett is a Program 2 stationary source subject to this subpart; therefore, it is required to prepare a worst-case release scenario analysis and complete the five-year accident history.

40 C.F.R. § 68.22 Offsite Consequence Analysis (OCA) Parameters – North Texas Rowlett utilizes EPA's RMP*Comp ™ software and the RMP Offsite Consequence Analysis Guidance to ensure the OCA parameters are met. I reviewed the facility's OCA documentation to ensure the data was accurate and up to date.

40 C.F.R. § 68.25 Worse-case release scenario analysis – North Texas Rowlett identified and analyzed at least one worst-case scenario for each regulated toxic substance held in a covered process using the parameters specified in the regulation

40 C.F.R. § 68.28 Alternative Release Scenario Analysis – North Texas Rowlett identified and analyzed at least one alternative release scenario for each regulated toxic substance held in a covered process using the parameters specified in the regulation.

40 C.F.R. § 68.30 Defining offsite impacts- Population – North Texas Rowlett estimated the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint; likewise, they used the most recent Census data to estimate the population potentially affected.

40 C.F.R. § 68.33 Defining offsite impacts- Environment – North Texas Rowlett listed in its RMP environmental receptors within a circle with its center at the point of the release and a radius determined by the distance to the endpoint as defined in § 68.22(a) of this part; likewise, they relied on U.S. Geological Survey (U.S.G.S.) data to identify environmental receptors.

40 C.F.R. § 68.36 Review and Update – North Texas Rowlett reviews and updates its OCA once every five years.

40 C.F.R. § 68.39 Documentation- North Texas Rowlett maintains records on the offsite consequence analyses, as required by the rule.

40 C.F.R. § 68.42 Five-year accident history- North Texas Rowlett is required to include in its five-year accident history all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage. The facility identified and included only one incident that met this qualification in its accident history. The incident occurred in November of 2015 and resulted in two (2) serious injuries. The release duration was 4 minutes and resulted in 70 pounds of chlorine gas being released into the atmosphere. As a result of the incident, North Texas Rowlett created and trained personnel on new procedures and upgraded its chlorination/sulfonation systems by adding cylinder mounted vacuum regulators. I queried the National Response Center (NRC) database to ensure additional releases from the facility that could possibly be included in the facility's five-year accident history were not omitted. The data required by the regulation for each accidental release was documented in a report

Subpart C - Program 2 Prevention Program

40 C.F.R. § 68.48 Safety Information – I reviewed North Texas Rowlett's compiled safety information related to the regulated substances, processes, and equipment including: (1) Material Safety Data Sheets (MSDS); (2) Maximum intended inventory of equipment in which the regulates substances are stored and processes; (3) Safe upper and lower temperatures, pressures, flows, and compositions; (4) Equipment specifications; and (5) Codes and standards used to design, build and, operate the process. All of the safety information was up to date and met the requirements of the regulations.

North Texas Rowlett utilizes the following codes and standards to ensure its process is designed in compliance with recognized and generally accepted good engineering practices:

- Uniform Fire Code (UFC)
- National Electrical Code (NEC)
- Chlorine Institute Standards (CIS)
- Compressed Gas Association (CGA) Standards
- American Society for Testing and Materials (ASTM) Standards
- American National Standards Institute (ANSI) Standards
- American Society of Mechanical Engineers (ASME) Standards

North Texas Rowlett's primary source for standards in the use and the handling of chlorine is the Chlorine Institute's publication, Chlorine Basics.

40 C.F.R. § 68.5 Hazard Review – I reviewed North Texas Rowlett's two most recent hazard reviews, which were conducted on June 9, 2014 and April 11, 2016. The hazard reviews identified the hazards associated with the process and regulated substances, opportunities for equipment malfunctions or human errors that could cause an accidental release, safeguards used/needed to control the hazards or prevent equipment malfunctions, and the steps used to detect/monitor releases.

North Texas Rowlett utilized the what/if checklist method to conduct its hazard review. The facility determined this method to be appropriate due to availability of checklists and what/if questions from guidance documents.

North Texas Rowlett documented the results of the review and ensured that problems identified were resolved in a timely manner. The hazard review is updated at least every five years or whenever a major change occurs.

40 C.F.R. § 68.52 Operating Procedures – This regulation requires North Texas Rowlett to prepare written operating procedures that provide clear instructions or steps for safely conducting activities associated with each covered process consistent with the safety information for that process. I reviewed North Texas Rowlett's operating procedures. Those that I examined met this requirement. The operating procedures addressed each of the following phases of operation: (1) initial startup; (2) normal operations; (3) temporary operations; (4) emergency shutdown; (5) normal operations; (6) startup following shutdown; (7) consequences of deviation; and (8) equipment malfunctions.

40 C.F.R. § 68.54 Training – This regulation requires refresher training to be provided to employees operating the process at least every three years, and more often if necessary, to ensure that the

employee understands and adheres to the current operating procedures of the process, but allows the owner/operator, in consultation with the employees, to determine the appropriate frequency of refresher training.

North Texas Rowlett provides refresher training annually. I reviewed training records for randomly selected employees. The records are stored in a file cabinet on site. The records reviewed showed that refresher training was provided each year in accordance with the regulation and the refresher training schedule established by the facility.

North Texas Rowlett is required to ensure operators are trained in any updated or new procedures prior to the startup of a process after a major change. North Texas Municipal District implemented a corporate wide lock out tag out procedure in 2015. I reviewed training records to ensure employees are being trained on new procedures. Based on this review, I determined employees were trained on this specific procedure.

40 C.F.R. § 68.56 Maintenance - North Texas Rowlett uses procedures and instructions provided by covered process equipment vendors and industry codes as the basis for stationary source maintenance procedures. The facility utilizes Maximo software to notify employees when preventative maintenance needs to be performed.

The regulation requires maintenance contractor companies doing work for North Texas Rowlett to ensure that their contract maintenance employees are trained to perform the maintenance procedures. I reviewed the contactors' statements of work for the North Texas Rowlett facility and each included language ensuring contract maintenance employees are trained.

I reviewed training records to verify the employees involved in maintenance activities can perform the job tasks in a safe manner. The employee training records showed that maintenance workers were trained in the hazards of the process, in how to avoid or correct unsafe conditions, and in the procedures applicable to the employee's job tasks

In addition to an instrumentation worker who does the major maintenance work, employees perform daily checks on process equipment to ensure no apparent deficiencies are present.

40 C.F.R. § 68.58 Compliance Audit – North Texas uses a contractor, Municipal H2O, in conjunction with North Texas staff to conduct its compliance audit. I reviewed the facility's two most recent compliance audits, which were conducted June 13, 2014 and December 9, 2015. The compliance audits evaluated the facility's compliance with the provisions of this subpart to verify that the procedures and practices developed under the rules are adequate and are being followed as required.

North Texas Rowlett normally conducts its compliance audits once every three years as required, but, as a result of the November 2015 incident, conducted the December 2015 compliance audit within a year of its previous audit.

40 C.F.R. § 68.60 Incident Investigations – The regulation requires facilities to investigate each incident which resulted in, or could reasonably have resulted in a catastrophic release. I reviewed the incident investigation for the event occurring in November 2015. North Texas Rowlett initiated the incident investigation within 48 hours following the incident. The facility prepared a report at the conclusion of the investigation, which included the date of the incident, the date the investigation began, a description of the incident, factors that contributed to the incident, and recommendations resulting from the investigation. North Texas Rowlett promptly addressed and resolved the investigation's

findings and recommendations and documented the corrective actions**.** The findings of the investigation were reviewed with all affected personnel whose job tasks are affected by the findings not just at the Rowlett facility, but at both other North Texas Municipal District facilities as well.

Subpart E- Emergency Response

40 C.F.R. § 68.90 Applicability- North Texas Rowlett employees do not respond to accidental releases of regulated substances.

40 C.F.R. § 68.95 Emergency response program- As a non-responding entity, North Texas Rowlett is not required to have an emergency response program; however, the facility is required to ensure it is included in its community emergency response plan developed under 42 U.S.C. 11003, coordinates response actions with the local fire department, and have appropriate mechanisms in place to notify emergency responders when there is a need for a response. North Texas Rowlett maintains an emergency response plan that includes all of the aforementioned information, meeting the requirements of the regulation.

Subpart G- Risk Management Plan

40 C.F.R. § 68.190 Updates- The Risk Management Plan for this facility was re-submitted on April 18, 2016. The next RMP submission is due by April 18, 2021.

40 C.F.R. § 68.195 Required corrections- An update is required and subsequent updates are required every five years, if the facility has new accident history information, or has a change in emergency contact information. Per this requirement, North Texas Rowlett submitted a correction for its emergency contact information on September 28, 2016.

Section III – AREAS OF CONCERN

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

Section IV – FOLLOW UP

No information was received by EPA after exiting the Facility on March 19, 2018.

Section V – LIST OF APPENDICES

Appendix 1 - Opening conference sign-in sheet

Appendix 2 - North Texas Rowlett Management System & Responsibility Descriptions

Appendix 1: Opening Conference Sign-In Sheet

North Texas Rowlett Sign In Sheet

	Name	E-mail	Phone #
*	Joshua Boyd	JBoyd@ntmwd.com	972-424-~~1707~~2722
*	Brent Lorance	blorance@ntmwd.com	972-424-2722
*	Morgan Dadgostar	mdadgostar@ntmwd.com	972-626-3945
*	MIKE RICKMAN	MRICKMAN@NTMWD.COM	972 948 7849
*	Michael Walker	MWalker@ntmwd.com	469-316-5704
	JEFF REED	JREED@LGSLAWFIRM.com	512-322-5831
	Jim Shirley	JShirley@ntmwd.com	469-626-4326
*	Joshua Hathaway	jhathaway@ntmwd.com	214-223-6481
	Jenna Covington	JCovington@"	972-442-5405

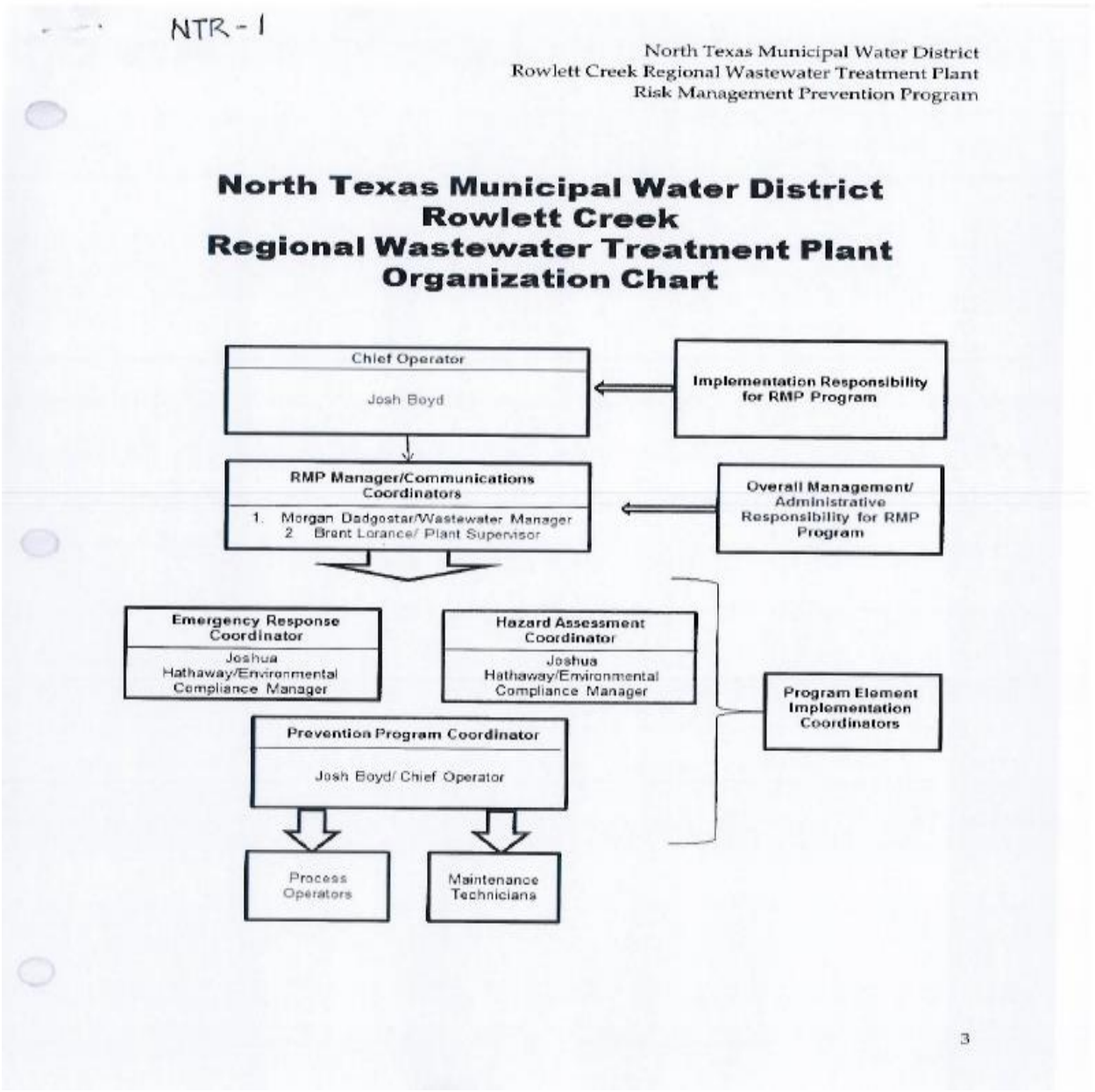
* attended close out meeting

5/19

Appendix 2: North Texas Rowlett Management System & Responsibility Descriptions

NTR - 1

North Texas Municipal Water District
Rowlett Creek Regional Wastewater Treatment Plant
Risk Management Prevention Program



2.2 Responsibilities of RMP Designees

RMP Manager/Communications Coordinator

- Serves as the primary point of contact for local, state, and federal agencies and to thepublic.
- Communicates accidental release incident to the public through the proper means of communication.
- Directs resources to help the HAZMAT team and LEPC.
- Authorizes the hazard assessment and preparation or revision of the RMP.

Hazard Assessment Coordinator

- Makes sure that hazard assessment, including offsite consequence analysis, is conducted for new toxic or hazardous chemicals subject to the RMP Rule, if they are brought into service at the facility. The RMP will be revised and updated according to the following schedule:
  - Within 5 years of initial submission or most recentupdate
  - No later than 3 years after a newly regulated substance is first listed by EPA
  - No later than the date on which a covered substance is first present above a threshold quantity in a new process
  - Within 6 months of a change that requires a revised process hazard analysis or hazard review
  - Within 6 months of a change that requires a revised offsite consequence analysis, which is triggered by changes in processes, quantities stored or handled, or any other aspect of the stationary source that might increase or decrease the distance to the endpoint by a factor of two or more
  - Within 6 months of a change that alters the program level that applied to any covered process
  - Within 6 months of an accident that resulted in off-siteimpacts
  - Within 30 days of a change in Emergency Contactinformation.
- Documents worst-case and alternative releasescenarios.
- Provides information to the RMP manager about submitting a revised RMP toEPA.
- Ensures documentation of accidental releases from regulated processes.
- Coordinates with the emergency response coordinator to ensure that new toxic or hazardous substances brought into use are included in the Emergency ActionPlan.
- Coordinates with the prevention program coordinator to ensure that new toxic or hazardous substances and equipment brought into use are included in the training procedures, standard operating procedures, and maintenanceprocedures.

Prevention Program Coordinator

- Activates the Incident Investigation Team and supervises the incident investigation procedures.
- Oversees the implementation of Incident Investigation Team recommendations.
- Ensures that employees are properly trained in standard operating procedures, appropriate maintenance procedures, and emergency response procedures.
- Ensures that maintenance procedures for equipment involving toxic and hazardous chemicals are up-to-date and readily available.
- Maintains or oversees that all process equipment and detection equipment are tagged and that maintenance schedules are strictly followed.
- Ensures that the preventive maintenance records and equipment trouble shooting records are kept.
- Coordinates with the safety engineer and maintenance supervisor to assess the maintenance history of equipment to identify the service worthiness of equipment.
- Maintains appropriate manufacturer's literature on equipment in toxic or hazardous substance service.
- Coordinates with the maintenance engineer to maintain equipment drawings, specifications, site plans, and MSDSs.
- Coordinates with the maintenance and operations division to actively seek employee views and comments regarding equipment regarding safety procedures, operating procedures, and maintenance procedures.
- Coordinates with the hazard assessment coordinator to ensure that hazard assessment is conducted on new toxic or hazardous substances and equipment brought into use.
- Keeps the RMP manager informed about new procedures, revisions, and updates to the maintenance procedures, maintenance schedules, and operator training programs.

Emergency Response Coordinator

- Assembles the Emergency Response Team and oversees the emergency response actions.
- Coordinates with the engineering contractors to ensure that new equipment and new methods of operation do not pose a danger to the safety of employees.
- Coordinates with the operating and maintenance supervisors in collecting employee input to any hazards posed by processes, equipment, and procedures.
- Ensures that the Emergency Response Program (ERP) is up-to-date.
- Ensures that the ERP is coordinated with the hazardous material (HAZMAT) team and the Local Emergency Planning Committee (LEPC).