

United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report

Central Wastewater Treatment Plant

Nashville, Tennessee

June 24, 2021

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 water treatment process at the Central Wastewater Treatment Plant (Central WWTP) facility located in Nashville, Davidson County, Tennessee. This facility was selected for inspection because it hasn't been inspected within the last five years under the RMP. The inspection, which was conducted on June 24, 2021, 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. Numerous documents were provided for review off-site. This report will provide a background of the facility and a listing of observations.

2.0 Background

The Central WWTP facility is located in Nashville, Tennessee. The facility uses chlorine and sulfur dioxide (SO₂) for water treatment purposes. The process is regulated as program level 3. According to facility records, the facility has a maximum of 360,000 pounds of chlorine and 360,000 pounds of SO₂ 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: Jordan Noles, EPA

Inspector-in-Training: Bethany Terpin, EPA

Date of Facility Visit: June 24, 2021

Facility Identification

Name: Central WWTP
Street Address: 1600 Second Avenue North
City: Nashville County: Davidson State: Tennessee Zip: 37208
EPA Facility ID No: 1000 0019 7495
Dun & Bradstreet (D&B) No: 605166941
Latitude: 36.186111
Longitude: -86.78889

Name, address, and phone of corporate parent company:
Owner/Operator: Metro Department of Water Services
Mailing Address: 1600 Second Avenue North
City: Nashville State: Tennessee Zip: 37208
Phone: (615) 862-4501

Name, title, and email of person responsible for 40 C.F.R. Part 68 implementation:
Name: David Tucker
Title: Assistant Director
Phone: (615) 862-4584
Email: david.tucker@nashville.gov

Name and title of emergency contact:
Name: Claude Grant Jr.
Title: Treatment Plant Manager
Day phone: (615) 818-5482
24-hour Phone: (615) 445-5035
Email: claud.grantjr@nashville.gov

Name and titles of stationary source personnel involved in site inspection (*accompanied site tours, provided documents and explanations*):
Name: Manny Ojo
Title: Regulatory Compliance Manager
Phone: (615) 862-6954
Email: manny.ojo@nashville.gov

Name: Claude Grant Jr.
Title: Treatment Plant Superintendent
Phone: (615) 862-4900
Email: claud.grantjr@nashville.gov

Name: David M. Tucker
Title: Assistant Director
Phone: (615) 862-4900
Email: david.tucker@nashville.gov

Note: This is a union facility.

Date and Program Levels of Submitted Risk Management Plan

Date of initial submission: June 29, 1999

Date of most recent submissions: August 07, 2019

Process: Disinfection

Process ID: 1000101997

Program Level as reported in RMP: 3

NAICS code: 56221(Waste Treatment and Disposal)

3.0 Observations

The inspection of the Central WWTP facility evaluated various sections of the RMP regulations (40 C.F.R. Part 68, Program Level 3) and the inspection checklist included in “Guidance for Conducting Risk Management Programs Inspections under Clean Air Act Section 112(r).” The inspection included discussions with the facility representatives regarding a myriad of issues related to the operation of its water treatment process, the facility’s RMP, a review of paperwork associated with the facility’s most recent Risk Management Plan, and a tour of the facility. An inspection in-brief and out-brief were conducted. Observations from the RMP inspection at the Central WWTP facility are discussed below:

1. 40 C.F.R. § 68.75(a) requires the owner or operator to establish and implement written procedures to manage changes (except for “replacements in kind”) to process chemicals, technology, equipment, and procedures; and changes to stationary sources that affect a covered process.
 - When asked by the inspection team, facility representatives could not produce written procedures to manage changes to the process.
2. 40 C.F.R. § 68.83(a) requires the owner or operator to develop a written plan of action regarding the implementation of the employee participation required by § 68.83.
 - While the facility does inform the employees of process hazard analyses via email, there is no written plan of action regarding the implementation of the employee participation found in the facility’s RMP.

Inspection Report,

Prepared by:

Noles, Jordan

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

Date

Approved by:

**JASON
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Date: 2021.08.18 17:45:02
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Jason Dressler, Chief
North Air Enforcement Section
U.S. EPA Region 4

Date