

CAA112(r) INSPECTION REPORT

Name: Cameron Municipal Water Treatment Plant	
Address: 1100 West Eighth Street Cameron, MO 64429	Date of Inspection: December 15, 2022
County: Dekalb	Case No: 23MO1215
Phone: (816) 632-2844	RMP No: 1000094335
High Risk: No	FRS No: 1000 0000 4452
CAA Title V: No	Program Level: Program 2
Mailing Address: 205 North Main, Cameron, MO 64429	
Process: 22131 NAICS Description: Water Supply and Irrigation Systems	

SUMMARY OF OBSERVATIONS

A review of the Cameron Municipal Water Treatment Plant documents and facility revealed the following deficiencies:

1. The facility failed to ensure that the 2020 and 2021 Tier II forms were submitted to the State of Missouri on the as required by 40 CFR 370.40(a).
2. The facility failed to ensure that the Hazard Assessment was updated every five years as required by 40 CFR 68.36(a).
3. The facility failed to maintain documentation of assumptions, parameters used, methodology and impacts to population and the environment with regards to worst case and alternate release scenarios as required by 40 CFR 68.39.
4. The facility failed to ensure that the 2014 and 1999 hazard assessments defined offsite impacts to population and the environment as required by 40 CFR 68.30 and 40 CFR 68.33.
5. The facility chlorine storage and feed rooms were not adequately labeled as required by the Chlorine Institute Pamphlet 155 edition 3 Section 4.4 and 40 CFR 1910.1200 (f)(10) and 40 CFR 68.48(b) Safety Information, the facility should be in compliance with recognized and generally accepted good engineering practices which includes Chlorine Institute Publications.
6. The chlorine detector sensors in the facility chlorine feed room had not been replaced for 2 ½ years. The manufacturer recommends that a sensor be replaced every 2 years. 40 CFR 68.48(b) Safety Information, states that the facility should be in compliance with recognized and generally accepted good engineering practices which includes equipment manufacturer recommendations.

- 7. The facility chlorine operations SOP did not address temporary operations or startup following an emergency shutdown. 40 CFR 68.52(b) states that the facility SOPs should address both temporary operations as well as a startup following an emergency shutdown.**
- 8. The facility failed to ensure that compliance audits are performed every 3 years as required by 40 CFR 68.58.**
- 9. The facility failed to update their RMP within the five-year deadline as required by 40 CFR 68.190(b)(1).**

INTRODUCTION

I, Lorenzo Sena, a Compliance Inspector with the U.S. Environmental Protection Agency (EPA), Region VII, inspected Cameron Municipal Water Treatment Plant (Cameron MWTP) in Cameron, Missouri on December 15, 2022. Cameron MWTP was selected for an inspection because the facility RMP update was submitted 5 months late.

I arranged for the inspection on December 13, 2022, with Mr. Paul Rinehart, the Cameron MWTP Superintendent.

I conducted the inspection to determine if the facility complies with Section 112(r) of the Clean Air Act (CAA), as amended in 1990. The inspection also included reporting provisions of the Emergency Planning and Community Right to Know Act (EPCRA) and the release reporting provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The inspection forms completed during the onsite inspection are included as Appendix #1.

EPA's regulations describing how these laws are to be implemented are found in the Code of Federal Regulations, Title 40, Part 68 (CAA), 355, 370, and 372 (EPCRA). The law and the implementing regulations 40 CFR 68, Chemical Accident Prevention Program (CAPP) require that the facilities must submit a complete Risk Management Plan (RMP) to the EPA for those regulated chemicals they possess in amounts above the applicable threshold quantities after June 21, 1999, and to implement the program described in the RMP.

A facility diagram, the locations where the photographs were taken, and the photos taken during the inspection are included as Appendix #2.

HISTORY OF BUSINESS

The Cameron MWTP in Cameron, MO, is located on the west side of the town of Cameron, MO. This facility treats drinking water for the city of Cameron and a small nearby municipality. The facility has a capacity of three, 2,000-pound chlorine gas cylinders, two of which are connected

to the chlorine system at any one time. The current chlorine system was installed in 1999 and remains unchanged since then. A flow diagram detailing the treatment system as well as the chemical addition points is included as Appendix #3.

According to the 2020 census, 8,513 (est.) individuals reside in the town of Cameron, MO. The most recent RMP (See Appendix #4) for Cameron MWTP, lists the facility as a Program 2 facility (which I concur with), and I proceeded to conduct this inspection as a Program 2 facility.

Maximum Intended Inventory	Amount of Chlorine gas in Pounds
Quantity Listed in RMP	6,000
Maximum Daily Quantity per Tier II Forms	1,000 – 9,999
Quantity Onsite at the time of Inspection	3 x 2,000

PERSONS INTERVIEWED AND INDIVIDUAL RESPONSIBILITIES

Paul Rinehart..... Cameron MWTP, Superintendent
Joe Whitaker..... Cameron MWTP, Lead Operator
Brian Ramey..... Cameron MWTP, Operator
Ripton Green..... Cameron MWTP, Operator

OPENING CONFERENCE

I arrived at the Cameron MWTP facility on December 15, 2022, at 8:27 am, I was met by Messrs. Rinehart, Whitaker, Ramey and Green. I presented my credentials to the group and we each introduced ourselves and proceeded with the inspection.

I explained how the inspection would progress and discussed the inspection forms with the group. I explained that I would write a report of the inspection, turn it in to EPA Management and they would assign a Case Review Officer (CRO) who would be in contact with the facility regarding details of the inspection. I did inform them that he would receive a copy of my inspection report, and the photos taken during the inspection.

EPCRA TIER II

The facility RMP (Appendix #4) lists a maximum capacity of 6,000 pounds of chlorine gas onsite. Prior to the inspection, I requested and was provided a copy of the most recent (2019) facility Tier II forms which were submitted to the Missouri Department of Natural Resources (MDNR). The facility Tier II forms (included as Appendix #5) list a maximum of 1,000 to 9,999 pounds of chlorine onsite.

During the inspection, I asked the group how the amount of chlorine gas reported on the Tier II forms was calculated. Messrs. Rinehart and Whitaker explained that the facility connects two-

one ton chlorine cylinders to the system and retains one extra cylinder as a backup so the maximum amount of chlorine which the facility can store is 6,000 pounds.

As of December 12, 2022, the facility Tier II forms for 2020 and 2021, had not been submitted. I asked Mr. Rinehart why the facility had not submitted the Tier II forms annually, he replied that, in the past the facility would receive a reminder from the MDNR to submit the Tier II forms and said that when he would receive the reminders, he would resubmit as soon as he received the reminder and said that he had not received any reminders to resubmit. He said that on Monday December 12, 2022, MDNR notified him that the Tier II forms for 2020 and 2021 had not been submitted and he was instructed to submit them. Mr. Rinehart submitted the facility Tier II forms for the 2020 and 2021 calendar year on December 14, 2022. In addition to the 2019 Tier II forms, the recently submitted Tier IIs are included as Appendix #5.

Based on this observation, I identified the following preliminary finding:

1. The facility failed to ensure that the 2020 and 2021 Tier II forms were submitted to the State of Missouri on the as required by 40 CFR 370.40(a).

At the conclusion of the inspection, I issued the facility a Notice of Preliminary Findings (NOPF) which is included in Appendix #1. The NOPF identifies the finding mentioned above.

Following the inspection, I noted that the 2020 and 2021 Tier II forms are incorrect as far as the reported max quantity and show up to 4,999 pounds and not the 6,000 pounds which the facility maintains onsite. In addition to this, the Tier II forms were not certified as required by 40 CFR 370.42(a). I contacted Mr. Rinehart via e-mail on January 4, 2023, and requested that he correct the forms, certify/ sign them then re-submit them to the State of Missouri and then send me a copy of the corrected form. On January 5, 2023, I received a call from Mr. Rinehart, and he explained that since there were no changes at the facility, he continued to report the same amount code he used in previous years (code 03) which is according to the State of Missouri Emergency Response Commission website reflects an amount of 1,000 to 9,999 pounds. I verified this after an internet search for Missouri Tier II reporting, the only information I could locate was the same as the information found and used by Mr. Rinehart. I explained that he should call the State of Missouri Emergency Response Commission and ask them if they have updated the codes and if so to make corrections to the form and sign the certification on the form. On January 6, 2023, I received a call from Mr. Rinehart who said that he spoke with Ms. Karen Eagleson from the Missouri Emergency Response Commission. In his conversation with her, he inquired about the amount code in the 2020 and 2021 Tier II forms, she replied that the state was in the process of changing the codes to the actual number (in pounds) on site which has led to some confusion with the submittal of Tier II forms, to remedy this he changed the code to reflect the actual poundage of chlorine gas onsite. In addition, he inquired about signing the certification statement on the Tier II form, she explained that there is no way to sign or certify the Tier II forms using the online submission which only records a time and date stamp. She went on to say that this system and method of certification was reviewed and approved by EPA. Copies of the updated Tier II forms are included in Appendix #6.

On January 4, 2023, I called the Dekalb County Missouri Emergency Management Assistant Director Penny Gans and inquired as to whether the facility was included in the community emergency response plan, she explained that the Dekalb county LEPC is not an active LEPC but was in the process of entering into a Joint LEPC with surrounding counties. She mentioned that the City of Cameron has its own emergency management agency who maintains the community emergency plan which includes the City of Cameron MWTP. She also explained that if needed they (Dekalb County) could get the plan from the city of Cameron.

Following the conversation with Ms. Gans, I e-mailed Mr. Rick Bashor, the City of Cameron Police Chief and Emergency Management Director and asked about the facility inclusion in the community plan. On Friday January 6, 2023, I called the City of Cameron Police Department, and I was told Mr. Bashor had left for the day so I left a voicemail as a follow-up to my earlier e-mail. On Monday January 9, 2023, I received a reply from Mr. Bashor who explained that every year, the Cameron MWTF sends a binder which includes the information with regards to amount, location and SDSs of chemicals at the facility, which is used and included in the community emergency plan.

HAZARD ASSESSMENT

During the inspection, I requested and was provided a site Hazard Assessment, the most recent update/ review of the Hazard Assessment was completed in 2014 and included maps indicating the Offsite Consequence Analysis (OCA) Distance to Endpoint (DTE) for both the worst case and alternate release scenarios (Appendix #7). Mr. Rinehart explained that there have been no changes to the chlorine storage or feed system since it was installed in 1999.

40 CFR 68.36(a) states: "The owner or operator shall review and update the offsite consequence analyses at least once every five years."

Based on this observation, I identified the following preliminary finding:

2. The facility failed to ensure that the Hazard Assessment was updated every five years as required by 40 CFR 68.36(a).

At the conclusion of the inspection, I issued the facility a Notice of Preliminary Findings (NOPF) which is included in Appendix #1. The NOPF identifies the finding mentioned above.

The 2014 hazard assessment consisted only of two maps (worst case and alternate release) indicating the DTE for each release. There was however no documentation showing what information was used to determine the distance-to-endpoint (DTE), or the offsite impact to population or the environment for either the worst case or the alternate release scenarios. The facility also had a hazard assessment from 1999 (also included in Appendix #7) which included the documentation (for both worst case and alternate release scenarios) showing how the DTE was derived, but it did not have a map showing the affected area or any information with regards to the offsite impact to population or the environment.

Based on this observation, I identified the following preliminary finding:

- 3. The facility failed to maintain documentation of assumptions, parameters used, methodology and impacts to population and the environment with regards to worst case and alternate release scenarios as required by 40 CFR 68.39.**

The 1999 hazard assessment shows that the worst-case scenario DTE of 1.9 miles was calculated using RMP*Comp and involved the release of 4,000 pounds of chlorine gas with no mitigation measures and urban topography.

The 1999 hazard assessment alternate release scenario DTE was also calculated using RMP*Comp and involved the release of chlorine gas at a rate of 200 pounds per minute over a duration of 10 minutes with no mitigation measures and an urban topography.

Neither the 2014 nor the 1999 hazard assessments defined the offsite impact to populations as required by 40 CFR 68.30, in addition they did not address the offsite impact to the environment as required by 40 CFR 68.33.

Based on this observation, I identified the following preliminary finding:

- 4. The facility failed to ensure that the 2014 and 1999 hazard assessments defined offsite impacts to population and the environment as required by 40 CFR 68.30 and 40 CFR 68.33.**

At the conclusion of the inspection, I issued the facility a Notice of Preliminary Findings (NOPF) which is included in Appendix #1. The NOPF identifies the finding mentioned above.

Upon further review, I noted that the release quantity of chlorine gas used in the 1999 hazard assessment was incorrect. 40 CFR 68.25(b)(1) states "For substances in a vessel, the greatest amount held in a single vessel, taking into account administrative controls that limit the maximum quantity". and should be limited to the capacity of just one chlorine cylinder (2,000 pounds) instead of two (4,000 pounds) because they are both plumbed independently and not interconnected. The release quantity of chlorine gas in the alternate release scenario was correct and remained unchanged. In addition, in the 1999 hazard review no mitigation measures were selected, since the chlorine gas for both the worst case and alternate release scenarios would take place within the chlorine storage or feed room, mitigation measures should be selected on RMP*Comp.

Using RMP* Comp, I found the distance to endpoint (DTE) for the worst-case scenario (for one 2,000-pound cylinder) and used MARPLOT to determine if and how the affected population would change. In addition, I used RMP*Comp to determine the alternative release scenario DTE and used MARPLOT to determine the affected population.

Worst-Case

The change in volume (to include only the volume of one chlorine cylinder instead of two chlorine cylinders as in the 1999 hazard assessment) and the selection of mitigation measures, decreased the distance to endpoint from 1.9 miles to 0.9 miles which also reduced the affected population for the worst- case scenario from 8,453 to 3,587 individuals. The maps from the 2014 hazard assessment show the correct radius of 0.9 miles but as mentioned above, there is no documentation as to how this was derived or any information with regards to population or environmental receptors.

EPA United States Environmental Protection Agency

RMP*Comp

You are here: RMP*Comp > Start > Summary

RMP*Comp

[Back](#)

Estimated Distance Calculation

Estimated distance to toxic endpoint: 0.9 miles (1.4 kilometers)

This is the downwind distance to the toxic endpoint specified for this regulated substance under the RMP Rule. Report all distances shorter than 0.1 mile as 0.1 mile, and all distances longer than 25 miles as 25 miles.

Scenario Summary

Chemical: Chlorine
CAS number: 7782-50-5
Threat type: Toxic Gas
Scenario type: Worst-case
Physical state: Liquefied under pressure
Quantity released: 2000 pounds
Release duration: 10 min
Release rate: 110 pounds per minute

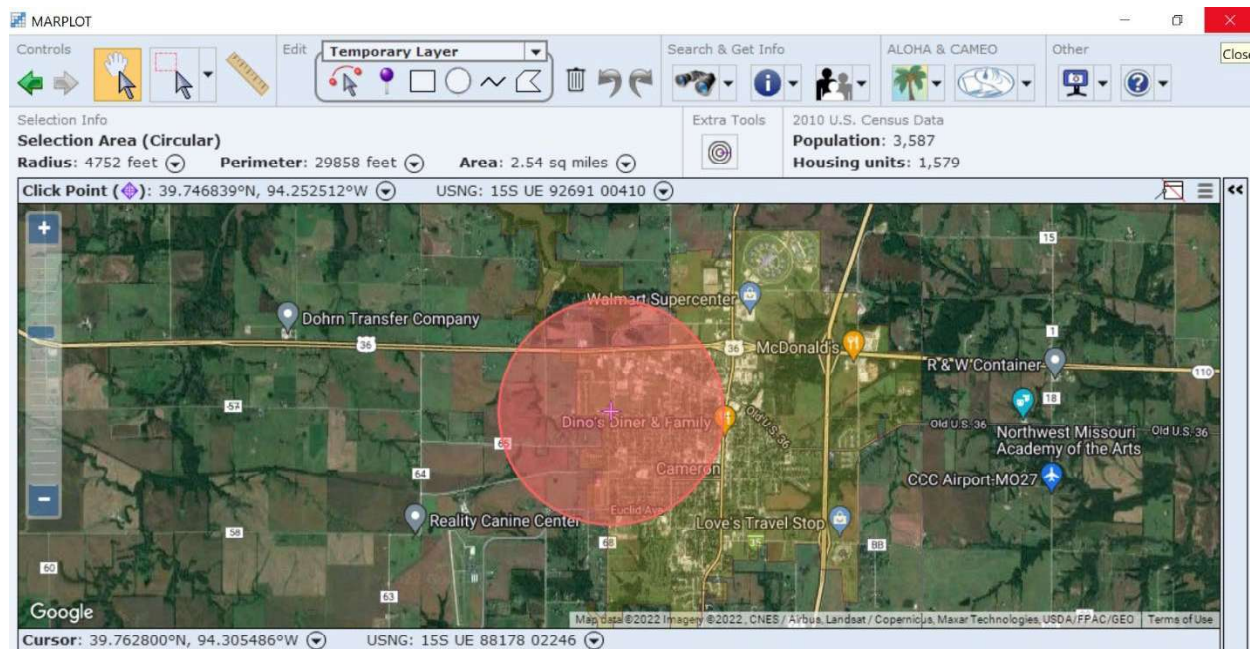
Mitigation measures: Release in enclosed space, in direct contact with outside air

Surrounding terrain type: Urban surroundings (many obstacles in the immediate area)

Toxic endpoint: 0.0087 mg/L basis: ERPC-2

Assumptions about this scenario

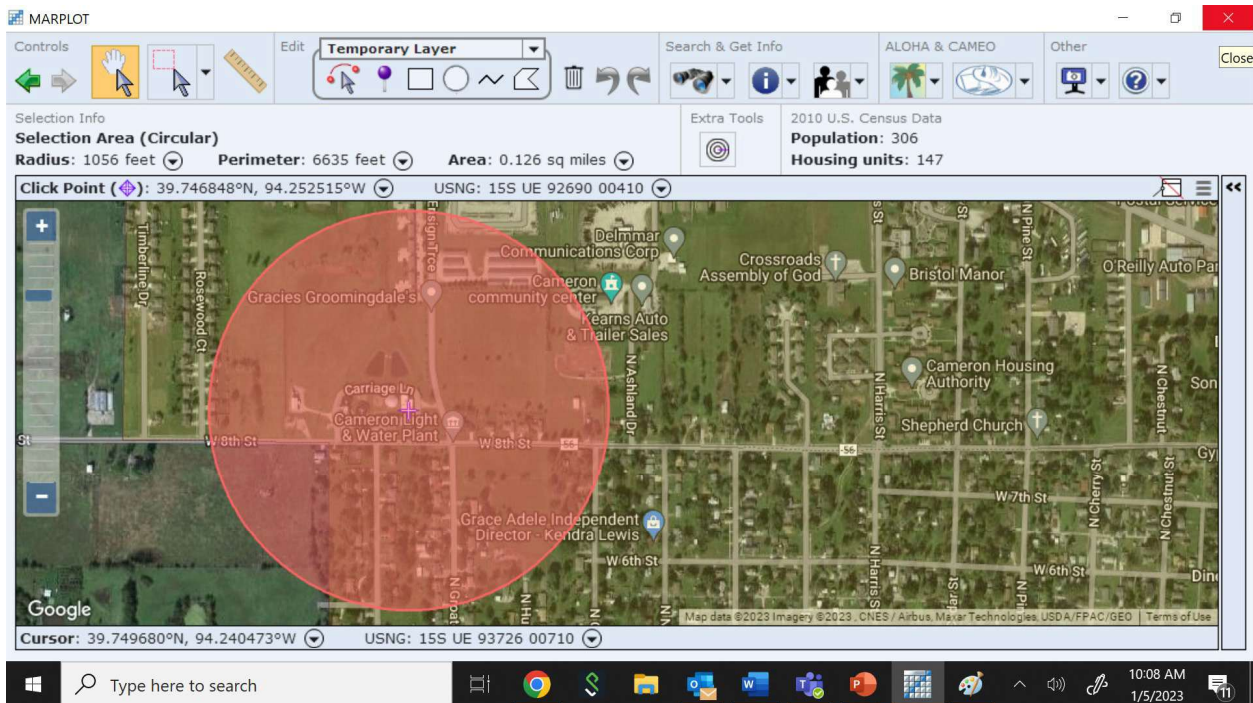
Wind speed: 1.5 meters/second (3.4 miles/hour)
Stability class: F
Air temperature: 77 degrees F (25 degrees C)



Alternate Release:

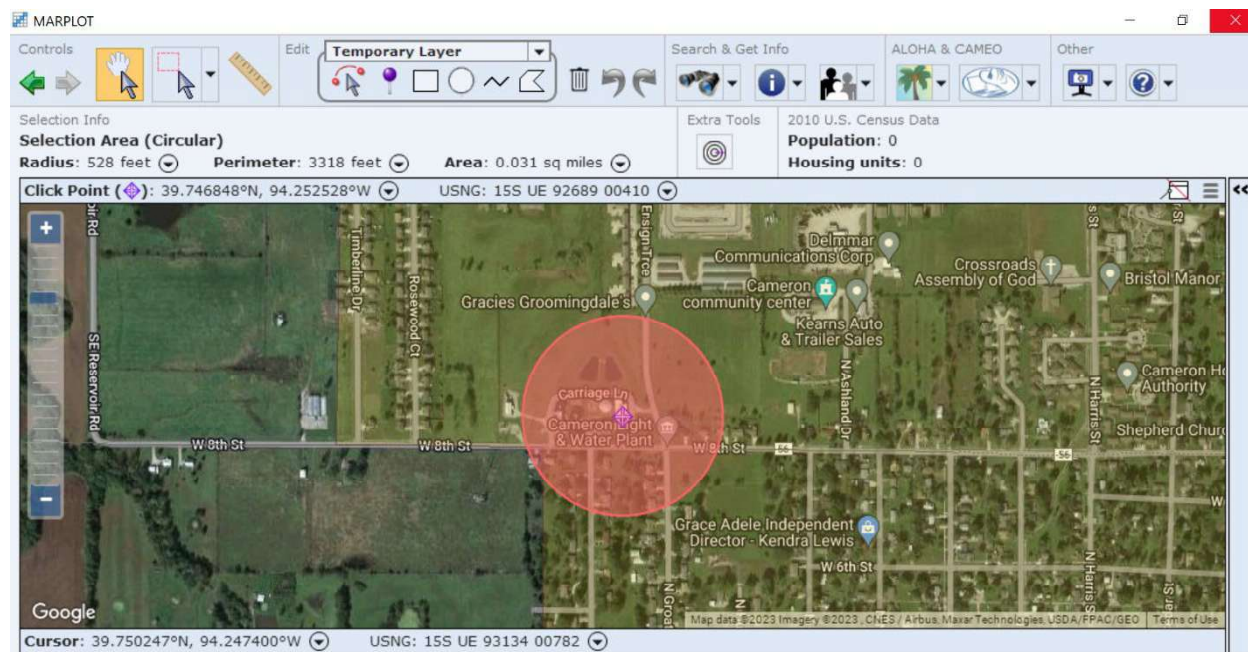
Using the scenario described in the 1999 hazard assessment of a 1” transfer hose rupture releasing 200 pounds per minute for 10 minutes, urban terrain and mitigation measures, and using RMP*Comp, I came up with a DTE of 0.2 miles. This results in an affected population of 306 individuals. The 1999 alternate release scenario shows a DTE of 0.3 miles and the 2014 alternate release scenario shows a DTE of 0.1 miles.

The screenshot shows the EPA RMP*Comp web application interface. The top navigation bar includes the EPA logo and the text "United States Environmental Protection Agency". The main content area is titled "RMP*Comp" and displays the "Estimated Distance Calculation" results. The results show an estimated distance to the toxic endpoint of 0.2 miles (0.3 kilometers). Below this, a "Scenario Summary" section provides details about the release scenario, including the chemical (Chlorine), CAS number (7782-50-5), threat type (Toxic Gas), scenario type (Alternative), physical state (Liquefied under pressure), release duration (10 minutes), release rate (200 pounds per min), and mitigation measures (Release in enclosed space, in direct contact with outside air). The surrounding terrain is identified as Urban surroundings (many obstacles in the immediate area), and the toxic endpoint is listed as 0.0007 mg/L (L basis: 0.0012 mg/L). Assumptions about the scenario include a wind speed of 1 meter/second (0.7 miles/hour), stability class D, and an air temperature of 77 degrees F (25 degrees C).



On January 6, 2023, I received an e-mail from Mr. Rinehart to which an updated worst case and alternate release scenario was attached (see Appendix #6). The worst-case scenario included

shows the affected radius of 0.9 miles and an affected population of 3,493 individuals along with the associated calculations from RMP*Comp and the alternate release scenario shows a lower (probably more realistic considering the use of vacuum regulators) value for the affected radius of 0.1 miles along with the calculations from RMP*Comp. Included in this information is a page from the Missouri State University CAPs that shows an application error when a radius of 0.1 miles is used. I used the exact coordinates as well as the radius to calculate the affected population using MARPLOT and it resulted in a population of zero (even though there are houses in the area as shown by the alternate release scenario map).



SAFETY INFORMATION

Cameron MWTP did have the current Safety Data Sheets (SDSs) from Hawkins Inc. for the chlorine gas they purchase.

During this inspection, I asked the group if they knew what industry code and standards the facility was designed to. Mr. Rinehart showed me section 11900 (Chlorine Gas Feed System) of the facility O&M Manual which listed the relevant codes and standards to which the facility was designed and maintained to (Appendix #8). In addition, the facility Management Plan for Chlorine also had information with regards to the safe upper and lower temperatures, pressures, flows, and compositions established for the chlorination system and the standard operating procedures for changing out chlorine tanks. The Management Plan for Chlorine is included as Appendix #9. The safety information maintained by the facility appeared to meet the requirements listed in 40 CFR 68.48.

During the facility walk through, I noted that the entrances to the chlorine storage room, chlorine feed room and chemical storage/ feed building were at one time labeled with NFPA Diamonds to indicate the hazards associated with the chemicals stored within (see Appendix 2, Photo #10, #11

and #12) but the labels had degraded sufficiently to the point where they were not legible and did not convey the hazards associated with the chemical contained therein.

The Chlorine Institute Pamphlet 155 “Water and Wastewater Operators Chlorine Handbook” Edition 3, Section 4.4 states “The chlorine storage area must be posted properly with signs in accordance with local codes and state and federal laws and regulations.”

29 CFR 1910.1200(f)(10) states” The employer shall ensure that workplace labels or other forms of warning are legible, in English, and prominently displayed on the container, or readily available in the work area throughout each work shift.”

40 CFR 68.48(b) states: “The owner or operator shall ensure that the process is designed in compliance with recognized and generally accepted good engineering practices. Compliance with Federal or state regulations that address industry-specific safe design or with industry specific design codes and standards may be used to demonstrate compliance with this paragraph”.

Based on this observation, I identified the following preliminary finding:

- 5. The facility chlorine storage and feed rooms were not adequately labeled as required by the Chlorine Institute Pamphlet 155 edition 3 Section 4.4 and 40 CFR 1910.1200 (f)(10) and 40 CFR 68.48(b) Safety Information, the facility should be in compliance with recognized and generally accepted good engineering practices which includes Chlorine Institute Publications.**

At the conclusion of the inspection, I issued the facility a Notice of Preliminary Findings (NOPF) which is included in Appendix #1. The NOPF identifies the finding mentioned above.

On January 6, 2023, Mr. Rinehart provided me with copies of order forms for the signs to replace all the signage which was in poor condition during the inspection (see Appendix #6).

During the inspection, I inquired as to the calibration frequency of the chlorine detectors used in the chlorine storage and feed rooms. During the facility walk through, I noted that the detector in the chlorine storage room had been replaced in March 2022 (Appendix #2, Photo #4). The detector in the chlorine feed room had been replaced on June 7, 2019 (Appendix #2, Photo #6). Mr. Rinehart said that these sensors are bump tested by a company service technician on an annual basis and he or Mr. Whittaker will conduct additional bump tests to verify that they are functioning properly. Upon review of the manufacturer’s literature (Appendix #10), section 4.5, I noted that it states that if an onsite full calibration (not bump test) is not practical then they recommend that a new sensor be installed every two years. Mr. Rinehart explained that he was not aware that the manufacturer recommended replacement every two years and said he would be sure to include this in their biennial plans.

Based on this observation, I identified the following preliminary finding:

- 6. The chlorine detector sensors in the facility chlorine feed room had not been replaced for 2 ½ years. The manufacturer recommends that a sensor be replaced every 2 years. 40 CFR 68.48(b) Safety Information, states that the facility should be in compliance with recognized and generally accepted good engineering practices which includes equipment manufacturer recommendations.**

At the conclusion of the inspection, I issued the facility a Notice of Preliminary Findings (NOPF) which is included in Appendix #1. The NOPF identifies the finding mentioned above.

HAZARD REVIEW

I asked the group if the facility had conducted a hazard review. Mr. Rinehart provided me with one dated 2022. The hazard review utilized a “what if” methodology and identified several issues which were documented and promptly remedied. Mr. Rinehart explained that the facility conducts hazard reviews for the chlorine storage and feed operations every year to ensure its safe operation. I reviewed the copy of the hazard review, and it appears to meet the requirements listed in 40 CFR 68.50.

STANDARD OPERATING PROCEDURES (SOPs)

I asked the group for a copy of the most recent Standard Operating Procedures. The SOPs detailing chlorine gas operations are included in the Facility Management Plan for Chlorine. I reviewed the SOP portion of this document and noted that the SOPs Included consequences of deviation, were detailed, and addressed initial startup normal operating procedures, emergency shutdown and normal shutdown.

I explained to Mr. Rinehart that in addition to those sections, the facility SOPs must address both temporary operations and startup following an emergency shutdown, he explained that since they have sufficient storage capacity and decreased demand due to one of the correctional facilities being closed down, it is only necessary to run the facility for a portion of the day. He explained that since this is the case, they don’t have any temporary operations with regards processes involving chlorine they simply shut down the system. I explained to him that the SOP should include a section in it identifying temporary operations followed by “not applicable”.

With regards to the startup following an emergency shutdown he stated that this procedure is no different than the regular start up. I explained that the SOP should be updated to include this section and referring the reader to the normal startup procedure. Other than the two sections mentioned above, the facility chlorine SOP appeared to meet the requirements listed in 40 CFR 68.52.

Based on this observation, I identified the following preliminary finding:

- 7. The facility chlorine operations SOP did not address temporary operations or startup following an emergency shutdown. 40 CFR 68.52(b) states that the facility**

SOPs should address both temporary operations as well as a startup following an emergency shutdown.

At the conclusion of the inspection, I issued the facility a Notice of Preliminary Findings (NOPF) which is included in Appendix #1. The NOPF identifies the finding mentioned above.

On January 6, 2023, Mr. Rinehart provided me with an updated facility management plan for chlorine (see Appendix #9). This updated version includes sections with regards to temporary operations as well as startup following an emergency shutdown.

TRAINING

During the inspection, I asked the group how operators who handled chlorine were trained. Mr. Rinehart explained that all the treatment plant employees including the ones who do not handle chlorine receive training by the State of Missouri to maintain their certifications as various stages of operators. He explained that this operator certification training is offered and taken by his staff every three years. The training includes classroom and knowledge tests and is put on by MDNR and is held in several cities throughout Missouri including Cameron. The training procedures, requirements and frequencies are listed in the facility Management plan for chlorine (see Appendix #9). The Training received by the Cameron MWTP appears to meet the training requirements listed in 40 CFR 68.54

MAINTENANCE

I asked Mr. Rinehart about the facility maintenance program, Mr. Rinehart said that the facility has a maintenance program and conducts general monthly maintenance inspections which includes the chlorine storage and feed operations. He explained that since the chlorine operations at the facility are rather limited and since most of the equipment is housed within two rooms, these areas are inspected daily every time the system is brought online. He said that any time they do any service or replacement of any portion of the system, the date the service (by plant personnel or the manufacturer/ distributor) or replacement is performed is written on the equipment. I verified this during the facility walk through. He explained that by doing this, the status of the equipment and the date it was last serviced is visible which, ensures that it is not overlooked, and maintenance occurs in a timely manner.

Mr. Rinehart explained that only he and Mr. Whitaker (or the manufacturer/ distributor) perform any maintenance on the chlorine system. He explained that the other operators will however observe the maintenance activities and have received training on chlorination systems put on by the Missouri Department of Natural Resources.

In general, the chlorine storage and feed rooms and associated plumbing appeared to be in very good condition, clean, labeled and well maintained with no signs of corrosion or any other conditions which would affect the integrity of the system. In addition to the condition of the plumbing of the chlorine system, safety of the system is further enhanced by the use of a vacuum system for the addition of chlorine. With this system, the only part of the system which is under

pressure is the connection from the chlorine cylinder to the regulator (which is attached directly to the cylinder so, it is a very small volume). In the event vacuum anywhere in the feed system is lost, the regulator automatically shuts off the chlorine flow from the cylinder.

The facility did not however have a written maintenance program or written records of each maintenance activity performed. 40 CFR 68.56(a) states: “The owner or operator shall prepare and implement procedures to maintain the on-going mechanical integrity of the process equipment”. Since this section does not mention that a written program or records are required the facility appeared to meet the requirements of this section.

COMPLIANCE AUDIT

I asked to see copies of the two most recent compliance audits performed by the facility. Mr. Rinehart was not sure if the facility had conducted one, he and I both reviewed the paperwork in the facility RMP binder and could not locate one. I explained what the compliance audit was and supplied him with a link to the eCFR part 68 which included requirements for compliance audits.

Based on these observations, I identified the following preliminary finding:

- 8. The facility failed to ensure that compliance audits are performed every 3 years as required by 40 CFR 68.58.**

At the conclusion of the inspection, I issued the facility a Notice of Preliminary Findings (NOPF) which is included in Appendix #1. The NOPF identifies the finding mentioned above.

On January 6, 2023, Mr. Rinehart provided me with a certified and completed compliance audit (Appendix #6). This compliance audit was completed on a 2015 version of the U.S. EPA RMP Program 2 Checklist.

INCIDENT INVESTIGATION AND OSHA 300 LOGS

During the inspection, I asked Mr. Rinehart if he maintained copies of any incident investigations or OSHA 300 logs. Mr. Rinehart replied that the facility has never had an accidental release of chlorine gas.

EMERGENCY RESPONSE

Cameron MWTP is a non-responding facility. In the event of a chlorine release, Mr. Rinehart said they would assess the release and if necessary, evacuate the area then call 911. Mr. Rinehart indicated that they do have a written emergency action plan which is included as Appendix #11

Mr. Rinehart stated he is a City of Cameron volunteer firefighter. The group was also aware that they were required to satisfy 40 CFR 68 requirements to document coordination activities with the local responders and I was provided the documentation which is included as Appendix #12.

During the facility walk through, I asked if the facility had a chlorine kit which was readily accessible. Mr. Rinehart said that the facility has a chlorine kit B in the garage which would be available to emergency responders in the event of a chlorine cylinder leak.

As mentioned above, Following the inspection, I inquired as to the facilities inclusion in the county emergency management plan. Mr. Bashor, the City of Cameron Police Chief and Emergency Management Director, explained that every year, the Cameron MWTF sends a binder which includes the information with regards to amount, location and SDSs of chemicals at the facility, which is used and included in the community emergency plan.

MANAGEMENT SYSTEM

I asked Mr. Rinehart if the facility had a management system (or organization chart) in place at the facility which lists the name of the person as well as their duties with regards to the RMP requirements. He explained that he is the one who has responsibility over this but said that he will be retiring in a little over a year and Mr. Whitaker would be taking over after he retires.

RISK MANAGEMENT PLAN

The current RMP for the Cameron MWTP was submitted on June 23, 2021 and is due for re-submission on June 23, 2026. The previous RMP (Appendix #13) was submitted on January 12, 2016 and was due for resubmission on January 12, 2016.

I reviewed the RMP, and it appeared to be complete. The current RMP was due to be submitted on January 12, 2021 and was instead submitted five months late.

40 CFR 68.190(b)(1) states that each stationary source must revise and update their RMP at least once every five years.

Based on this observation, I identified the following preliminary finding:

- 9. The facility failed to update their RMP within the five-year deadline as required by 40 CFR 68.190(b)(1).**

At the conclusion of the inspection, I issued the facility a Notice of Preliminary Findings (NOPF) which is included in Appendix #1. The NOPF identifies the finding mentioned above.

CLOSING CONFERENCE

I reviewed my observations and findings with the group. Mr. Rinehart signed the Receipts for Samples and Documents, the Notice of Preliminary Findings, and the Confidentiality Notice which are included as Appendix #1. Mr. Rinehart elected to not claim any CBI for the inspection. Mr. Rinehart made copies and kept of each one of these forms. I departed the facility at 12:48 pm on December 15, 2022.

LORENZO
SENA

Digitally signed by
LORENZO SENA
Date: 2023.01.12
08:42:44 -06'00'

Lorenzo Sena
Compliance Inspector

DAVE
HENSLEY

Digitally signed by
DAVE HENSLEY
Date: 2023.01.18
09:07:04 -06'00'

Dave Hensley
Chemical Accident Prevention
Section Chief

APPENDICES

- 1 - Inspection Forms and Checklists with Notes
- 2 - Facility Diagram and Photos
- 3 - Water Treatment Flow Diagram
- 4 - 2021 Risk Management Plan
- 5 - Tier II Forms 2019, 2020 and 2021
- 6 - Post Inspection Correspondence from Cameron MWTP
- 7 - Original Hazard Assessments 1999 and 2014
- 8 - Facility O&M Manual Section 11900 – Chlorine Gas Feed System
- 9 - Cameron MWTP Management Plan for Chlorine
- 10 - Acutec 35 Chlorine Sensor Manual Pages 34-36
- 11 - Cameron MWTP Emergency Response Plan
- 12 - Documentation of Emergency Response Coordination Activities
- 13 - 2016 Risk Management Plan