Section 1. Registration Information

Reason for Resubmission	5-year update (40 CFR 68.190(b)(1))
1.1 Source Identification	
1.1.a. Facility Name	Community Water System
1.1.b. Parent Company #1 Name	
1.1.c. Parent Company #2 Name	
1.2 EPA Facility Identifier	100000139192
1.3 Other EPA Systems Facility Identifier	
1.4 Dun and Bradstreet Numbers (DUNS)	
1.4.a. Facility DUNS	075633909
1.4.b. Parent Company #1 DUNS	
1.4.c. Parent Company #2 DUNS	
1.5 Facility Location	
1.5.a. Street - Line 1	299 Lakeshore Dr.
1.5.b. Street - Line 2	
1.5.c. City	Greers Ferry
1.5.d. State	AR
1.5.e. Zip Code - Zip +4 Code	72067
1.5.f. County	CLEBURNE
1.5.g. Facility Latitude (in decimal degrees)	35.594139
1.5.h. Facility Longitude (in decimal degrees)	-092.167361
1.5.i. Method for determining Lat/Long	Interpolation - Digital map source (TIGER)
1.5.j. Description of location identified by Lat/Long	Center of Facility
1.5.k. Horizontal Accuracy Measure (meters)	3
1.5.l. Horizontal Reference Datum Code	North American Datum of 1983
1.5.m. Source Map Scale Number	
1.6 Owner or Operator	
1.6.a. Name	Community Water System
1.6.b. Phone	(501) 825-7294
1.6.c. Street - Line 1	299 Lakeshore Dr.
1.6.d. Street - Line 2	
1.6.e. City	Greers Ferry
1.6.f. State	AR
1.6.g. Zip Code - Zip +4 Code	72067
Foreign Country	
Foreign State/Province	
Foreign Zip/Postal Code	
1.7 Name, title and email address of person or position responsible for RMP (part 68) implementation	
1.7.a. Name of person	Mike Messer
1.7.b. Title of person or position	Compliance Manager
1.7.c. Email address of person or position	mmesser@cwswater.org

Section 1. Registration Information

1.8 Emergency Contact	
1.8.a. Name	Timothy Shaw
1.8.b. Title of person or position	General Manager
1.8.c. Phone	(501) 825-7294
1.8.d. 24-Hour Phone	(501) 206-9071
1.8.e. 24-Hour Phone Extension/PIN #	
1.8.f. Email address for emergency contact	tshaw@cwswater.org
1.9 Other Points of Contact	
1.9.a. Facility or Parent Company E-mail Address	
1.9.b. Facility Public Contact Phone Number	
1.9.c. Facility or Parent Company WWW Homepage Address	
1.10 Local Emergency Planning Committee (LEPC)	Cleburne County LEPC
1.11 Number of fulltime equivalent (FTEs) employees on site	30
1.12 Covered by	
1.12.a. OSHA PSM	
1.12.b. EPCRA section 302	Y
1.12.c. CAA Title V Air Operating Permit Program	
1.12.d. Air Operating Permit ID #	
1.13 OSHA Star or Merit Ranking	
1.14 Last Safety Inspection (by an External Agency) Date	08/10/2012
1.15 Last Safety Inspection Performed by an External Agency	EPA
1.16 Will this RMP involve Predictive Filing?	
1.18 RMP Preparer Information	
1.18.a. Name	MunicipalH2O - Greg Rogers, CSP
1.18.b. Phone	(501) 537-4566
1.18.c. Street - Line 1	650 S. Shackleford Road, Suite 325
1.18.d. Street - Line 2	
1.18.e. City	Little Rock
1.18.f. State	AR
1.18.g. Zip	72211-3546
Foreign Country	
Foreign State/Province	
Foreign Zip Code	

Section 1. Registration Information

Section 1.17 Process Specific Information

Process 1

Process ID #	1000088277		
Process Description	High Service Chlorination		
1.17.a. Program Level	2		
1.17.b. NAICS Code(s)			
22131 (Water Supply and Irrigation Systems)			
1.17.c. Chemical(s)			
	Chemical Name	CAS Number	Quantity
	Chlorine	7782-50-5	5400

Section 2. Toxics: Worst Case

Scenario 1

Process Name	High Service Chlorination
2.1 Chemical	
2.1.a. Name	Chlorine
2.1.b. Percent Weight of Chemical	100
2.2 Physical State	Gas liquified by pressure
2.3 Model Used	EPA's RMP*Comp(TM)
2.4 Scenario	Gas Release
2.5 Quantity Released (lbs)	150
2.6 Release Rate (lbs/min)	15
2.7 Release Duration (mins)	10
2.8 Wind Speed (meters/sec)	1.5
2.9 Atmospheric stability class	F
2.10 Topography	Rural
2.11 Distance to endpoint (miles)	0.8
2.12 Estimated residential population within distance to endpoint (numbers)	175
2.13 Public receptors within distance to endpoint	
2.13.a. Schools	
2.13.b. Residences	Y
2.13.c. Hospitals	
2.13.d. Prison/Correctional Facilities	
2.13.e. Recreational Areas	Y
2.13.f. Major commercial, office or industrial areas	
2.13.g. Other	
2.14 Environmental receptors within distance to endpoint	
2.14.a. National or State Parks, Forests or Monuments	
2.14.b. Officially Designated Wildlife Sanctuaries, Preserves or Refuges	
2.14.c. Federal Wilderness Area	
2.14.d. Other	Greers Ferry Lake
2.15 Passive mitigation considered	
2.15.a. Dikes	
2.15.b. Enclosures	
2.15.c. Berms	
2.15.d. Drains	
2.15.e. Sumps	
2.15.f. Other	
2.16 Graphic file	

Section 3. Toxics: Alternative Release

Scenario 1

Process Name	High Service Chlorination
3.1 Chemical	
3.1.a. Name	Chlorine
3.1.b. Percent Weight of Chemical	
3.2 Physical State	Gas
3.3 Model Used	EPA's RMP*Comp(TM)
3.4 Scenario	Vessel leak
3.5 Quantity Released (lbs)	150
3.6 Release Rate (lbs/min)	165
3.7 Release Duration (mins)	30
3.8 Wind Speed (meters/sec)	1.5
3.9 Atmospheric stability class	C
3.10 Topography	Rural
3.11 Distance to endpoint (miles)	0.6
3.12 Estimated residential population within distance to endpoint (numbers)	93
3.13 Public receptors within distance to endpoint	
3.13.a. Schools	
3.13.b. Residences	Y
3.13.c. Hospitals	
3.13.d. Prison/Correctional Facilities	
3.13.e. Recreational Areas	Y
3.13.f. Major commercial, office or industrial areas	
3.13.g. Other	
3.14 Environmental receptors within distance to endpoint	
3.14.a. National or State Parks, Forests or Monuments	
3.14.b. Officially Designated Wildlife Sanctuaries, Preserves or Refuges	
3.14.c. Federal Wilderness Area	
3.14.d. Other	Greers Ferry Lake
3.15 Passive mitigation considered	
3.15.a. Dikes	
3.15.b. Enclosures	
3.15.c. Berms	
3.15.d. Drains	
3.15.e. Sumps	
3.15.f. Other	
3.16 Active mitigation considered	
3.16.a. Sprinkler systems	
3.16.b. Deluge systems	
3.16.c. Water curtain	
3.16.d. Neutralization	
3.16.e. Excess flow valve	

Section 3. Toxics: Alternative Release

3.16.f. Flares	
3.16.g. Scrubbers	
3.16.h. Emergency shutdown systems	
3.16.i. Other	chlorine detector alarms
3.17 Graphic file	

Section 8. Prevention Program: Program Level 2

Program 1

Prevention Program Description: Chlorine Disinfection Process	
8.1 NAICS Code for process	
8.1.a. Process Name	1000088277 (High Service Chlorination)
8.1.b. NAICS	22131 (Water Supply and Irrigation Systems)
8.2 Chemicals	
Chlorine	
8.3 Safety Information	
8.3.a. Date on which the safety information was last reviewed or revised	06/13/2018
8.3.b. Federal/State regulations or industry-specific design codes and standards used to demonstrate compliance with safety information requirement	
8.3.b.1. NFPA 58 (or state law based on NFPA 58)	
8.3.b.2. OSHA (29 CFR 1910.111)	
8.3.b.3. ASTM Standards	Y
8.3.b.4. ANSI Standards	Y
8.3.b.5. ASME Standards	Y
8.3.b.6. None	
8.3.b.7. Other	Chlorine Institute
8.3.b.8. Comments	
8.4 Hazard Review	
8.4.a. Date of completion of most recent hazard review or update	08/08/2015
8.4.b. Expected or actual date of completion of all changes resulting from the hazard review	08/08/2015
8.4.c. Major hazards identified	
8.4.c.1. Toxic release	Y
8.4.c.2. Fire	Y
8.4.c.3. Explosion	
8.4.c.4. Runaway reaction	
8.4.c.5. Polymerization	
8.4.c.6. Overpressurization	
8.4.c.7. Corrosion	Y
8.4.c.8. Overfilling	
8.4.c.9. Contamination	Y
8.4.c.10. Equipment failure	Y
8.4.c.11. Loss of cooling, heating, electricity, instrument air	
8.4.c.12. Earthquake	Y
8.4.c.13. Floods	
8.4.c.14. Tornado	Y
8.4.c.15. Hurricanes	
8.4.c.16. Other	

Section 8. Prevention Program: Program Level 2

8.4.d. Process controls in use	
8.4.d.1. Vents	Y
8.4.d.2. Relief valves	
8.4.d.3. Check valves	
8.4.d.4. Scrubbers	
8.4.d.5. Flares	
8.4.d.6. Manual shutoffs	Y
8.4.d.7. Automatic shutoffs	
8.4.d.8. Interlocks	
8.4.d.9. Alarms and procedures	Y
8.4.d.10. Keyed bypass	
8.4.d.11. Emergency air supply	Y
8.4.d.12. Emergency power	Y
8.4.d.13. Backup pump	Y
8.4.d.14. Grounding equipment	Y
8.4.d.15. Inhibitor additions	
8.4.d.16. Rupture disks	
8.4.d.17. Excess flow device	
8.4.d.18. Quench system	
8.4.d.19. Purge system	
8.4.d.20. None	
8.4.d.21. Other	
8.4.e. Mitigation systems in use	
8.4.e.1. Sprinkler system	
8.4.e.2. Dikes	
8.4.e.3. Fire walls	Y
8.4.e.4. Blast walls	
8.4.e.5. Deluge system	
8.4.e.6. Water curtain	
8.4.e.7. Enclosure	Y
8.4.e.8. Neutralization	
8.4.e.9. None	
8.4.e.10. Other	chlorinators
8.4.f. Monitoring/detection systems in use	
8.4.f.1. Process area detectors	Y
8.4.f.2. Perimeter monitors	
8.4.f.3. None	
8.4.f.4. Other	
8.4.g. Changes since last hazard review or hazard update	
8.4.g.1. Reduction in chemical inventory	
8.4.g.2. Increase in chemical inventory	Y
8.4.g.3. Change in process parameters	
8.4.g.4. Installation of process controls	
8.4.g.5. Installation of process detection systems	
8.4.g.6. Installation of perimeter monitoring systems	
8.4.g.7. Installation of mitigation systems	

Section 8. Prevention Program: Program Level 2

8.4.g.8. None recommended	
8.4.g.9. None	
8.4.g.10. Other	
8.5 Date of most recent review or revision of operating procedures	06/13/2018
8.6 Training	
8.6.a. Date of most recent review or revision of training programs	06/13/2018
8.6.b. Type of training provided	
8.6.b.1. Classroom	Y
8.6.b.2. On the job	Y
8.6.b.3. Other	Training films
8.6.c. Type of competency testing used	
8.6.c.1. Written test	Y
8.6.c.2. Oral test	Y
8.6.c.3. Demonstration	Y
8.6.c.4. Observation	Y
8.6.c.5. Other	
8.7 Maintenance	
8.7.a. Date of most recent review or revision of maintenance procedures	06/13/2018
8.7.b. Date of most recent equipment inspection or test	06/13/2018
8.7.c. Equipment most recently inspected or tested (equipment list)	All process equipment is inspected daily as part of Normal Operations
8.8 Compliance audits	
8.8.a. Date of most recent compliance audits	07/06/2017
8.8.b. Expected or actual date of completion of all changes resulting from the most recent compliance audits	07/06/2017
8.9 Incident investigation	
8.9.a. Date of most recent incident investigation	
8.9.b. Expected or actual date of completion of all changes resulting from the incident investigation	
8.10 Date of most recent change that triggered a review or a revision of safety information, the hazard review, operating or maintenance procedures, or training	09/08/2011

Section 9. Emergency Response

9.1 Written emergency response (ER) plan	
9.1.a. Is your facility included in the written community emergency response plan?	Y
9.1.b. Does your facility have its own written emergency response plan?	
9.2 Does your facility's ER plan include specific actions to be taken in response to accidental releases of regulated substances?	
9.3 Does your facility's ER plan include procedures for informing the public and local agencies responding to accidental releases?	
9.4 Does your facility's ER plan include information on emergency health care?	
9.5 Date of most recent review or update of your facility's ER plan	
9.6 Date of most recent ER training for your facility's employees	
9.7 Local agency with which your facility's ER plan or response activities are coordinated	
9.7.a. Name of agency	Cleburne County LEPC
9.7.b. Phone number	(501) 362-2991
9.8 Subject to	
9.8.a. OSHA Regulations at 29 CFR 1910.38	Y
9.8.b. OSHA Regulations at 29 CFR 1910.120	
9.8.c. Clean Water Act Regulations at 40 CFR 112	
9.8.d. RCRA Regulations at 40 CFR 264, 265, 279.52	
9.8.e. OPA-90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, 30 CFR 254	
9.8.f. State EPCRA Rules of Laws	Y
9.8.g. Other	

Executive Summary

Community Water System
Water Treatment Plant
RISK MANAGEMENT PROGRAM
EXECUTIVE SUMMARY

1.0Accidental Release Prevention and Emergency Response Policies

The Community Water System Water Treatment Plant is committed to the safety of our workers, the public, and the environment. The resources invested in the prevention of accidental releases of hazardous substances demonstrate this commitment. The Community Water System Water Treatment Plant implements reasonable controls, such as training of personnel and the safe design, installation, operation and maintenance of our processes. Our policy is to make every effort to prevent the release of hazardous substances but in the event of a release, our trained personnel and local emergency response agencies will respond to control and contain the release in a manner that will be safe for workers and will help prevent injuries to the public or the environment.

2.0Description of The Community Water System Water Treatment Plant and Regulated Substances

The Community Water System Water Treatment Plant handles one substance regulated by the Risk Management Plan Rule (RMP Rule) in quantities above the Threshold Quantity. This substance is:

* Chlorine - stored in 150 pound cylinders and used for disinfection of the water prior to distribution.

3.0Hazard Assessment

The RMP Rule requires The Community Water System Water Treatment Plant to perform a Hazard Assessment of the regulated substances stored and used in the covered processes at the facility. This Hazard Assessment includes an offsite consequence analysis for the following scenarios:

* One worst-case and one alternative release scenario for the toxic substance chlorine for the chlorination process unit at the facility.

The Community Water System Water Treatment Plant completed a Hazard Assessment for the covered processes and the results have been appropriately communicated to the local emergency response agencies. The Hazard Assessment has been recently updated to reflect changes in population.

4.0Accidental Release Prevention Program and Chemical-Specific Prevention Steps

The RMP Rule requires that a prevention program be established for The Community Water System Water Treatment Plant chlorination processes. The following details the prevention program elements at The Community Water System Water Treatment Plant that apply to these processes.

4.1Safety Information

The Community Water System Water Treatment Plant maintains a variety of technical documents that are used to help ensure safe operation of The Community Water System Water Treatment Plant processes. Material safety data sheets (MSDSs) document the physical and chemical properties of hazardous substances handled at The Community Water System Water Treatment Plant, including the chlorine in the covered process. The engineering design documents include the operating parameters, the design basis and configuration of the equipment in each covered process, and references to applicable codes and standards.

4.2Hazard Review

The Community Water System Water Treatment Plant performs and periodically updates hazard reviews of the covered processes to help identify and control process hazards. Checklists are used to guide the hazard review. These checklists include items to help ensure The Community Water System Water Treatment Plant operates and maintains the equipment in a manner consistent with the applicable design specifications, codes, standards, and regulations.

Executive Summary

4.3Operating Procedures

The Community Water System Water Treatment Plant develops and maintains operating procedures to define how tasks related to process operations should be performed. The operating procedures are used to:

1. train employees and contractors, and
2. serve as reference guides for appropriate actions to take during both normal and abnormal process conditions.

4.4Training

The Community Water System Water Treatment Plant trains personnel in the operating procedures to help ensure safe and effective performance of their assigned tasks. A record of all training is maintained to help ensure new and refresher training is provided on a timely basis.

4.5Maintenance

The Community Water System Water Treatment Plant properly maintains the equipment in our processes. The Community Water System Water Treatment Plant maintenance program includes:

1. procedures to safely guide workers in their maintenance tasks,
2. worker training in the maintenance procedures, and
3. inspection and testing program to help identify equipment deterioration and damage before equipment fails.

4.6Compliance Audits

The Community Water System Water Treatment Plant performs periodic (at least every three years) audits of covered processes to verify the processes are operating in compliance with the requirements of the RMP Rule. A compliance audit report is prepared after each audit, and any deficiencies noted by the audit are corrected in a timely manner.

4.7Incident Investigations

The Community Water System Water Treatment Plant investigates all incidents that could reasonably have resulted in a serious injury to personnel, the public, or the environment. The Community Water System Water Treatment Plant trains employees to identify and report any and all incidents requiring investigation. An investigation team is assembled and the investigation is initiated within 48 hours of the incident. The results of the investigation are documented, recommendations are resolved, and appropriate process enhancements are implemented.

4.8Chemical-specific Prevention Steps - Chlorine

Industry standards are followed at The Community Water System Water Treatment Plant to help ensure safe handling of chlorine. The vendor supplies chlorine via a Department of Transportation (DOT) approved truck and in DOT approved 150 pound cylinders. The process equipment is designed and constructed with state-of-the-art materials and technology utilizing the standards and guidelines of the Chlorine Institute, American Water Works Association, ASME, ANSI, and other applicable codes. Workers who perform operations involving chlorine receive training emphasizing safe handling procedures according to the guidelines required by The Community Water System Water Treatment Plant.

5.0Five Year Accident History

There has been no accidents or incidents that resulted in injuries to employee, the public, or the environment The Community Water System Water Treatment Plant in the past five years.

6.0Emergency Response Programs

Community Water System is a part of the Cleburne County, Arkansas "Emergency Response" and

Executive Summary

"Hazardous Material Spill Emergency Plan". This plan is on record in the Office of Emergency Management, Cleburne County, Arkansas. This plan identifies potential hazardous material storage sites within the county. It establishes guidelines for response and coordination by all Emergency Personnel and Equipment, Law Enforcement, State, Federal Agencies and notification procedures. This document contains Hazardous Material Source, Emergency Response Team locations and phone numbers. It also informs the user of the number of personnel available by location and the equipment they have operational.

CWS has included maps in the Emergency Response Plan which identify the Hazardous Material Source and the areas covered or involved should a release occur of any material that has been identified as Hazardous. This type of information was developed for the evacuation of populated areas in the event of a major chemical or gas release.

Community Water System is dedicated to the preservation of health, safety and welfare of its employees as well as its neighbors. The Board of Directors and Management of Community Water System have and will remain cognizant of "Risk Management" and will continue to review all aspects of its operation.

7.0Planned Changes to Improve Safety

The Community Water System Water Treatment Plant continuously attempts to improve the safety of our processes to protect our employees, the public and the environment. The Community Water System Water Treatment Plant incident investigations, employee suggestions and improvements in technology are utilized to update the safety aspects of the processes. The following changes to improve process safety are planned or have recently been completed.

1. Implemented a chlorine shipment Quality Assurance Program to aid in the inspection of chlorine cylinders when received.