



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 155
Seattle, WA 98101

ENFORCEMENT &
COMPLIANCE ASSURANCE
DIVISION

**Clean Air Act - Section 112(r)
Risk Management Program
and EPCRA 312 – Tier II
Facility Inspection Report**

FACILITY INFORMATION:

Company Name: NGL Supply Terminal Company, LLC
Facility Name: West Vancouver Railcar Terminal
Physical Address: 5701 Northwest Old Lower River Road
Vancouver, Washington 98660
Phone Number: (360) 694-2844
Latitude/Longitude: 45.650471, -122.728104
RMP Facility ID#: 1000 0021 9202
FRS ID#: 110046424384
EJ Concerns: Yes (Above 80%)

CONTACT INFORMATION (RMP Implementation):

Name: Kyle Plummer
Phone Number: (360) 690-6204
E-mail: kyle.plummer@nglep.com

EMERGENCY CONTACT INFORMATION:

Name: Jay Cain
Phone (24-hr): (360) 600-5587
E-mail: jay.cain@nglep.com
Website: nglenergypartners.com

TRIP DETAILS:

Inspection Date: March 2, 2023
Inspection Time: 09:07 AM through 12:40 PM
Inspectors: Edward Johannes, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Terry Garcia, US EPA Region 10 SEE Grantee, RMP Inspector
Erin Williams, EPA, EPCRA Coordinator
Mhara Coffman, EPA, RMP Inspector in Training
Lisa Graves, Weston Solutions, Inc., EPA START Contractor

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: August 28, 2012
Date of Latest Update: November 6, 2019

Process (Program 1, 2, 3) as reported in RMP:

Process ID	Description	Process Chemical ID	NAICS Code	Program Level	Chemical Name CAS Number	Quantity (lbs)
1000104376	Bulk LPG Storage	1000130717	42471	3	Butane (106-97-8)	1,600,000
1000104376	Bulk LPG Storage	1000130718	42471	3	Propane (74-98-6)	2,900,000

PURPOSE:

The purpose of this inspection was to determine whether this facility is in compliance with Section 112(r) of the Clean Air Act (CAA) and Title 40 Code of Federal Regulations (CFR) Part 68, Chemical Accident Prevention Provisions.

- The facility has been previously inspected in the past 5 years: No ☒ Yes ☐
If Yes, Date of Last Inspection: 4/24/2015
- The facility is High Risk: No ☐ Yes ☒
- Joint EPCRA inspection: No ☐ Yes ☒

CAA Title V Air Permit:

Does the facility have a CAA Title V Permit? No ☒ Yes ☐

If Yes, Permit Number:

RELEASE/ACCIDENT HISTORY:

Did the facility have a reportable release in the past 5 years? No ☒ Yes ☐

If Yes, Date and Description of the Release:

EPCRA TIER II REPORTING:

Did the facility submit the 2022 Tier II report to the SERC? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 02/14/23

If No, calendar year of the most recent Tier II:

Did the facility submit a Tier II to the LEPC and local fire department? No ☐ Yes ☒

If Yes, Date the Tier II was submitted: 02/14/23

INSPECTION ENTRY:

Edward Johannes led the inspection entry. The EPA inspection team met with Kyle Plummer, at West Vancouver Railcar Terminal facility (facility) operated by NGL Supply Terminal Company, LLC (NGL) in Vancouver, Washington. The team arrived at the facility at 09:07 AM and was joined by the following facility personnel:

Name	Title
Kyle Plummer	Regional Manager
Jay Cain	Terminal Operator
Donald Malone	PSM Manager
Aaron Gillis	Lead Operator
Zachery Pellymouter	Terminal Operator

Was a state/county/or local emergency representative present?

No ☒

Yes ☐

If Yes, Name and Title of Representative:

The facility is a first responder:

No ☒

Yes ☐

If No, Responding Agency: Vancouver Fire Department

The inspection team signed in at the facility's office. Introductions were made by Edward Johannes, who provided a summary of the risk management program (RMP) and explained the purpose of the visit. Each team member presented his/her credentials.

EPA requested an explanation of the facility's operations and any additional safety measures that should be taken during the site tour. Kyle Plummer gave a brief description of the facility, operations, and personal protective equipment required for the tour. Inspectors were required to watch the facility safety video before conducting the site tour. For an additional safety measure, the facility temporarily ceased product transfer operations during the inspection.

Prior to the inspection, EPA sent a certified notice of inspection letter to the facility informing them of the CAA Section 112(r)(6)(L) requirement that facility employees and employee representatives (such as a union representative) have the right to participate in the RMP inspection, and that a copy of the letter must be provided to the employee representative(s) and the letter posted in a manner accessible to employees in the facility.

The facility is unionized:

No ☒

Yes ☐

If Yes, Name of Union:

An employee representative present during the facility visit:

No ☐

Yes ☒

If Yes, Name/Title: Jay Cain, Terminal Operator

GENERAL INFORMATION:

The facility is regulated under the RMP as a Program Level 3 facility and is owned and operated by NGL whose parent company is NGL Energy Partners LP. This company is a diversified midstream MLP that provides multiple services to producers and end-users, including transportation, storage, blending and marketing of crude oil, NGLs, refined products/renewables, and water solutions. The facility was purchased from Keyera Energy by NGL in 2013. The facility is a Liquefied Petroleum Gas (LPG) bulk terminal storage location for resale to retail butane and propane dealers. Presently, the facility is in the process of being purchased from NGL by an undisclosed buyer.

The facility has two 80,000-gallon aboveground storage tanks (ASTs) that can hold approximately 290,000 pounds (lbs) each of liquid propane and one 75,000-gallon AST dual service tank that can hold approximately 330,000 lbs of liquid butane or LPG. This tank was previously dedicated to butane, but in recent years it has stored only LPG due to changes in market demand. The facility has not received liquid butane for several years.

Onsite the facility has three rail sidings that can accommodate sixteen 33,000-gallon LPG/liquid butane tanker railcars and leases another siding adjacent to the facility that can hold up to six tanker railcars.

The facility has one area for the transfer of LPG/liquid butane products from stationary tanker railcars to ASTs and a separate area for the transfer LPG/liquid butane products from the ASTs to tanker trucks or from tanker trucks to the ASTs. Both of the facility's LPG/liquid butane transfer areas integrate manual and automatic emergency shutoff equipment.

The facility has three full-time employees on site, two of which are operators. They are present from 06:00 AM to 02:00 PM, Monday through Friday and as needed on weekends.

ON-SITE OBSERVATIONS:

The facility tour was conducted from approximately 09:45 to 11:15 AM. Facility representative Kyle Plummer and other facility personnel escorted the EPA Inspection Team (EPA) as they observed and inspected the covered process areas of the facility. Photographs were taken of the tanker railcar and tanker truck LPG transfer areas and the ASTs and associated infrastructure. The photographs are found in Attachment A to this report.

Six Rail Tower Transfer Loading stations allows the conveyance of LPG/liquid butane from stationary tanker railcars to the ASTs (Photo 1). The LPG/liquid butane flow gauges and valves are color coded to show if they hold liquid (red) or gas (yellow) product (Photo 2). The system has a flammable gas detector (Photo 3) set to alarm when the atmosphere is within 20% of the lower explosive limit (LEL), and the system executes shutdown once the atmosphere is within 40% of the LEL. The system includes a manual emergency shutoff to the ASTs (Photo 4). In addition, the system has a built-in hydrostatic release valve (Photo 5). The product is pumped by vapor compressors (Photo 6) and vertical loading turbine pumps (Photo 7). The facility main office has a Human Machine Interface (HMI) System to remotely display and monitor LPG/liquid butane levels in the ASTs (Photo 8). The Master Control Center (MCC) and Programmable Logic Controller (PLC) are located outside behind the facility office (Photo 9).

The three ASTs (also known as “bullet tanks”) are designed specifically to receive and store butane and LPG (Photo 10). The three tanks are clearly labeled with universal placards for flammable gas (Photo 11) and have built-in air actuator and flex fittings (Photo 12). In addition, the ASTs rest on concrete saddles and are secured in place with tank straps (Photo 13).

The transfer of LPG from an AST to tanker trucks is allowed once a driver logs into the system. The facility is accessible to truck drivers 24/7 for LPG/liquid butane loading. After hour access to the facility’s Check-In Office is achieved using a secure key lockbox (Photo 14). The Check-in Office has a setup for drivers to access the system through a touch panel interface (Photo 15). The office includes safety information and facility emergency contacts (Photo 16). The facility has both manual and automatic emergency shutdown systems on all LPG equipment (Photo 17).

The loading rack area is where drivers can hookup hoses and meter the LPG/liquid butane transfer to their tanker trucks (Photos 19). A pipe bridge brings LPG/liquid butane to the loading rack area allowing for clearance of tanker trucks (Photo 18). The loading rack area has a Accuload III Controller that incorporates several safety features. The loading rack area emergency shutoff valve is clearly labeled, and directional flow arrows are clearly marked on the pipelines. The loading rack area is installed with smart hoses, which will automatically cut-off the flow of the product if a catastrophic hose failure or a disconnect occurs (Photo 19). LPG/liquid butane can also be unloaded from tanker trucks and sent to the facility’s ASTs using equipment located adjacent to the loading rack area (Photo 20).

The facility has an emergency action plan in the event of a release. Other safety features observed during the inspection were the lockout tagout station (Photo 21), a windsock (Photo 22), a built-in ground grid system for electronic classified equipment (Photo 23), all pipelines are clearly marked and run above ground allowing for easier inspections and maintenance (Photos 2, 4, 5, 6, 7, 10, 18, and 20), and crash gates. In addition, there are three fixed fire water monitor stations that are distributed in different areas of the facility (Photo 24).

After touring the RMP-covered process areas at the facility, EPA returned to the main office to review the RMP documentation. Upon completion of the document review, EPA provided a debrief to Kyle Plummer, Jay Cain, Donald Malone, Aaron Gillis, and Zachery Pellymounter.

INFORMATION COLLECTED FROM FACILITY:

1. Visitor/Contractor Daily Sign-In Sheet
2. Visitor Orientation Checklist
3. Vancouver WA Bulk LPG Terminal Site Piping Key Plan Diagram
4. Safety (General Work) Permit
5. API510 Pressure Vessel External Inspection Document
6. SOP Training Log for NGL Employees
7. Business Cards of NGL Facility Representatives

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

No areas of concern were identified during the inspection.

DOCUMENTS REQUESTED NOT INCLUDED IN REPORT:

The following documents were requested during the inspection but are not included in this report. These documents will still be reviewed to determine compliance with Section 112(r) of the CAA.

During the inspection, no follow-up document requests were made requiring further review.

INSPECTION REPORT CERTIFICATION:

This is to certify that I, Edward Johannes, was the lead inspector at this facility and that I have verified the accuracy of the observations in this inspection report:

EDWARD JOHANNES
(Affiliate)

 Digitally signed by EDWARD JOHANNES (Affiliate)
Date: 2023.05.11 14:15:25 -07'00'

Inspector Signature

JAVIER MORALES

 Digitally signed by JAVIER MORALES
Date: 2023.05.11 14:49:01 -07'00'

RMP Coordinator/Approval

ERIN WILLIAMS

 Digitally signed by ERIN WILLIAMS
Date: 2023.05.12 10:37:09 -07'00'

EPCRA Coordinator/Approval

MATTHEW QUARTERMAN

 Digitally signed by MATTHEW QUARTERMAN
Date: 2023.05.12 12:32:20 -07'00'

Land Enforcement Section Chief/Approval

Attachment A – Photo Log

Site Name: NGL Service Terminal Company, LLC for West Vancouver Railcar Terminal
City, State: Vancouver, Washington
Photographer: Lisa Graves

File	Photo Layout ID	Date	Time	Description
Photo 1.jpg	1	3/2/2023	10:30 AM	Rail Tower 3 Transfer Loading
Photo 2.jpg	2	3/2/2023	10:30 AM	Sight-Glass with Backflow Safety-Shutoff for Liquid (Red) and Gas (Yellow) Transfer
Photo 3.jpg	3	3/2/2023	10:36 AM	Flammable Gas Detector
Photo 4.jpg	4	3/2/2023	10:37 AM	Propane Tanks 1 and 2 Emergency Shutoffs
Photo 5.jpg	5	3/2/2023	10:56 AM	Hydrostatic Release Valve
Photo 6.jpg	6	3/2/2023	10:37 AM	Compressors
Photo 7.jpg	7	3/2/2023	10:23 AM	Vertical Loading Turbine Pumps 1 and 2
Photo 8.jpg	8	3/2/2023	11:11 AM	Human Machine Interface (HMI) System
Photo 9.jpg	9	3/2/2023	11:09 AM	Master Control Center (MCC) and Programmatic Logic Controller (PLC)
Photo 10.jpg	10	3/2/2023	10:42 AM	Butane/Propane Tank (Left) and Propane Tanks (Center, Right)
Photo 11.jpg	11	3/2/2023	10:45 AM	Propane Tanks 1, 2, 3 (East side)
Photo 12.jpg	12	3/2/2023	10:50 AM	Air Actuator and Flex Fittings on Tank 1
Photo 13.jpg	13	3/2/2023	10:44 AM	Propane Tank 1 Concrete Saddle and Tank Strap
Photo 14.jpg	14	3/2/2023	10:14 AM	Security Key Box for Truck Driver Access to Check in Office
Photo 15.jpg	15	3/2/2023	10:13 AM	Dearman Control Panel in Check in Office
Photo 16.jpg	16	3/2/2023	10:13 AM	Truck Driver Product Safety Information
Photo 17.jpg	17	3/2/2023	10:15 AM	Propane Emergency Shutoff from Office
Photo 18.jpg	18	3/2/2023	11:06 AM	Pipe bridge allowing for truck clearance
Photo 19.jpg	19	3/2/2023	11:06 AM	Truck Loading Rack Area to Access Accuload III Controller
Photo 20.jpg	20	3/2/2023	11:05 AM	Truck Propane Unload Area
Photo 21.jpg	21	3/2/2023	10:14 AM	Lockout Tagout in Office
Photo 22.jpg	22	3/2/2023	10:57 AM	Facility Windssock
Photo 23.jpg	23	3/2/2023	10:52 AM	Ground Grid System for Electronic Classified Equipment
Photo 24.jpg	24	3/2/2023	10:47 AM	Fixed Fire Water Monitor #3