

United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report

Blanchard Terminal Company LLC - Nashville 51st

Nashville, Tennessee

January 31, 2024

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 butane blending process at the Blanchard Terminal Company LLC – Nashville 51st (BTC) facility located in Nashville, Davidson County, Tennessee. This facility was selected for inspection because it had never been inspected under the RMP. The inspection, which was conducted on January 31, 2024, 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. Requested program documents were provided for further review off-site. This report will provide a background of the facility and a listing of observations.

2.0 Background

The BTC facility is located in Nashville, Tennessee. This facility uses butane for fuel blending purposes. The process is regulated as program level 3. According to facility records, the facility has a maximum of 251,606 pounds of butane on site. The butane 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: Justin Stark, U.S. EPA

Inspector: Jordan Noles, U.S. EPA

Inspector: Callie Sotolongo (Inspector-In-Training), U.S. EPA

Date of Facility Visit: January 31, 2023

Facility Identification

Name: Blanchard Terminal Company LLC - Nashville 51st
Street Address: 1409 51st Avenue North
City: Nashville County: Davidson State: Tennessee Zip: 37209
EPA Facility ID No: 1000 0021 6946
Dun & Bradstreet (D&B) No: 78697868
Latitude: 36.165820
Longitude: -86.848150

Name, address and phone of corporate parent company:
Owner/Operator: MPLX Terminals, LLC.
Mailing Address: 539 South Main Street
City: Findlay State: Ohio Zip: 45840
Phone: 419-422-2121

Name, title, and email of person responsible for 40 C.F.R. Part 68 implementation:
Name: Angela Brown
Title: Terminals HESS Manager
Phone: (419)-421-2629
Email: asbrown@marathonpetroleum.com

Name and title of emergency contact:
Name: David Schmidt
Title: Terminal Manager
Day phone: (515) 297-3521
24-hour Phone: (502) 264-1494
Email: drschmidt@marathonpetroleum.com

Name and titles of stationary source personnel involved in site inspection (*accompanied site tours, provided documents and explanations*):
Name: Steve Strayer
Title: Sr. HES Professional
Phone: (419)-701-1560
Email: StStrayer@marathonpetroleum.com

Name: Dale Hildebrandt (Energy Transfer)
Title: Sr. PSM Specialist
Phone: (210)-502-3100
Email: dale.hildebrandt@energytransfer.com

Note: This is not a union facility.

Date and Program Levels of Submitted Risk Management Plan

Date of initial submission: February 22, 2012

Date of most recent submissions: March 08, 2021

Process: Butane Blending

Process ID: 1000114542

Program Level as reported in RMP: 3

NAICS code: 42471 (Petroleum Bulk Stations and Terminals)

3.0 Observations

The inspection of the BTC 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 began with an opening discussion of facility operations. The discussion was followed by a tour of the facility’s gas processing areas. EPA inspectors then requested paperwork associated with the facility’s Risk Management Plan (RMPlan). The documents were reviewed by EPA inspectors on-site and provided for review off-site. An inspection out-brief was conducted where EPA inspectors described their observations. Observations from the RMP inspection at the BTC facility are discussed below:

- No compliance issues were observed during the inspection.

Inspection Report,

Prepared by:

JUSTIN
STARK

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JUSTIN STARK
Date: 2024.03.25
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Justin Stark, Inspector
North Air Enforcement Section
U.S. EPA Region 4

Approved by:

JASON DRESSLER

Digitally signed by JASON
DRESSLER
Date: 2024.03.25 16:22:38 -04'00'

Jason Dressler, Section Chief
North Air Enforcement Section
U.S. EPA Region 4