



**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:

Name: Phillips 66 Portland Terminal
Physical Address: 5528 NW Doane Ave, Portland, Oregon 97210
Phone Number: 503-248-1572
Latitude/Longitude: 45.560591, -122.739873
RMP Facility ID#: 1000 0023 8352
FRS ID#: 1100 0048 7438
EJ Concerns: No (Below 80%)

CONTACT INFORMATION (RMP Implementation):

Name: William Todd Burke
Phone Number: 503-849-4456
E-mail: William.t.burke@p66.com

EMERGENCY CONTACT INFORMATION:

Name: William Todd Burke
Phone (24-hr): 503-849-4456
E-mail: William.t.burke@p66.com
Website: <https://www.phillips66.com/>

TRIP DETAILS:

Inspection Date: 3/30/2022
Inspection Time: 0900 hours through 1445 hours
Inspectors: Bob Hales, US EPA Region 10 SEE Grantee, Lead RMP Inspector
Terry Garcia, US EPA Region 10 SEE Grantee, RMP Inspector
Edward Johannes, US EPA Region 10 SEE Grantee, RMP Inspector
Peter Phillips, US EPA Region 10 SEE Grantee, RMP Inspector
Tom Vroman, CIH, Weston Solutions, Inc., EPA START Contractor

DATE AND PROGRAM LEVELS OF SUBMITTED RMP:

Initial Submission Date: 8/29/2018

Date of Latest Update: 3/11/2019

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)
1000090155	Butane Storage	1000112685	42471	3	106-97-8	380,000

PURPOSE:

The purpose of this inspection was to determine whether this facility is in compliance with Section 112(r) of the Clean Air Act 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:
- 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 2021 Tier II report to the SERC? No ☐ Yes ☒*If Yes, Date the Tier II was submitted:*

2/25/2022

*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:*

2/25/2022

INSPECTION ENTRY:

Bob Hales led the inspection entry. The inspection team met with William Todd Burke at the Phillips 66 Portland Terminal facility in Portland, Oregon. The team arrived at the facility at 0900 hours and was joined by the following facility personnel:

Name	Title
William Todd Burke	Terminal Supervisor
Chas Kintner	H&S
Ken Hayes	Senior Environmental Consultant
Chris Forbes	Operator
Jose Campos	Operator
Mathew Paul	Operator

Name	Title
Rodrick Nunez	Audit Manager, Energy Transfer Partners

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:

Facility representatives escorted the EPA inspection team to a conference room located in the facility's office building. Introductions were made by Bob Hales, 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 then requested an explanation of the facility's operations and any additional safety measures that should be taken during the site tour. William Todd Burke gave a brief description of the facility, operations, and personal protective equipment required for the tour.

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: Chris Forbes, Operator; Jose Campos, Operator

GENERAL INFORMATION:

The facility is regulated under the Risk Management Program as a Program Level 3 facility and is owned and operated by Phillips 66. Phillips 66 Portland Terminal (Terminal) is a light products bulk petroleum storage facility which stores and distributes petroleum products to retail and commercial end-users in the Portland, Oregon area. The Terminal handles and stores various grades of unleaded gasoline, low-diesel fuel, and additives. The Terminal operates a RMP covered process which blends butane and gasoline. The blended gasoline is then sold to customers or sent through a Kinder Morgan owned pipeline off the property. The Terminal began operating their butane process in 2018. The blending process includes a butane unloading station, butane storage vessel, valves, a pump, and associated piping and ancillary equipment. Butane is stored in a 90,000-gallon pressurized horizontal storage vessel located on the south side of the property. Butane is transferred to and blended with gasoline (product rack injection and pipeline injection) using a fixed piping system and injection skid. There are 40 employees on site, including ten employees who work on the butane process.

ON-SITE OBSERVATIONS:

The facility tour was conducted from approximately 1000 hours to 1115 hours. The inspection team was escorted by William Todd Burke, Ken Hayes, Chas Kintner, Chris Forbes, and Jose Campos. The inspection team observed the butane unloading station, storage vessel, valves, testing equipment, and pump to an external pipeline.

Photographs were taken of the butane process. The photographs that were taken at the facility are included in Attachment A to this report.

After touring the RMP-covered process areas at the Phillips 66 Portland Terminal, the inspection team returned to the conference room to review the RMP documentation. Upon completion of the document review, EPA provided a debriefing to William Todd Burke, Ken Hayes, Chris Forbes, and Rodrick Nunez.

INFORMATION COLLECTED FROM FACILITY:

1. Phillips 66 Portland Facility Safety Review and Emergency Evacuation Plan (4 pages)
2. Phillips 66 PSM Operator Training Records (2 pages (14" x 11"))
3. Corporate HSE Compliance and Man System Audit: 41806 (1 page)
4. Energy Transfer PSM Compliance Program Maintenance Procedure Training (1 page)
5. Contract between Phillips 66 and Energy Transfer (10 pages)

AREAS OF CONCERNS ADDRESSED IN CLOSING CONFERENCE:

1. The owner operator has not trained each employee involved in maintaining the ongoing integrity of the process equipment. [68.73(c)]. The Phillips 66 Portland Terminal was unable to produce training records for Energy Transfer employee, Scot Harrison.

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 Clean Air Act.

1. 2018 and 2020 Training Records for Energy Transfer Employee

INSPECTION REPORT CERTIFICATION:

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

JAVIER MORALES Digitally signed by JAVIER
MORALES
Date: 2022.07.28 13:25:28 -07'00' For

Inspector Signature

JAVIER MORALES Digitally signed by JAVIER
MORALES
Date: 2022.07.28 13:26:44 -07'00'

RMP Coordinator/Approval

ERIN WILLIAMS Digitally signed by ERIN WILLIAMS
Date: 2022.07.28 15:36:28 -07'00'

EPCRA Coordinator/Approval

Jennifer A Sullivan Digitally signed by Jennifer A
Sullivan
Date: 2022.07.28 15:27:11 -07'00'

Land Enforcement Section Chief/Approval