



Region 6 Enforcement and Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	05/09/2023 - 05/11/2023	
Media Program:	Air	
Regulatory Program(s)	Clean Air Act (CAA) § 112(r) and 40 Code of Federal Regulations (C.F.R.) Part 68 Chemical Accident Risk Management Plan (RMP) Program Level 3	
Company Name:	Enterprise GC LLC (EPCO)	
Facility Name:	Texas City Terminal	
Facility Physical Location:	700 14 th Street South	
(city, state, zip code)	Texas City, Texas 77590	
Mailing address:	P.O. Box 4324	
(city, state, zip code)	Houston, Texas 77210	
County/Parish:	Galveston	
Facility Contact/Title:	Doug D'Aquila	Staff Engineer – Safety/Process Safety Management (PSM)
(email address)	DJDAQUILA@eprod.com	
FRS Number:	110000503054	
Identification/Permit Number:	Not Applicable	
Media Identifier Number:	RMP 10000 0006 5449	
NAICS:	42471 – Petroleum Bulk Stations and Terminals	
Personnel participating in inspection:		
Tony Robledo	U.S. EPA	Inspector/Enforcement Officer
Aimee Boss	U.S. EPA	Inspector/Enforcement Officer
Tommy Montemayor	Enterprise GC LLC	Lead Operations
Norman Slagle	Enterprise GC LLC	Texas City Superintendent
Cameron Bachtel	Enterprise GC LLC	PSM Specialist
Douglas D'Aquila	Enterprise GC LLC	Staff Engineer – Safety/PSM
Dwayne Zeno	Enterprise GC LLC	Safety
Kyle Wingate	Enterprise GC LLC	PSM Manager
Heather Makarczyk	Enterprise GC LLC	Senior Field Environmental
Ricky Bockhorn	Enterprise GC LLC	PSM Coordinator
Loren Toppass	Enterprise GC LLC	Maintenance Planner
Ismael Gonzales	Enterprise GC LLC	Maintenance Planner
Sean Boardman	Enterprise GC LLC	Mechanical Integrity (MI) Planner Director
David Leiser	Enterprise GC LLC	MI Senior Manager
Casey Shows	Enterprise GC LLC	MI Supervisor
EPA Lead Inspector Signature/Date		
	Tony Robledo	
Supervisor Signature/Date		
	Samuel Tates	

Section I – INTRODUCTION PURPOSE OF THE INSPECTON

We, the Environmental Protection Agency (EPA) Region 6 inspectors Tony Robledo and Aimee Boss arrived at the Enterprise GS LLC facility at approximately 9:00 a.m. on May 9, 2023, for an announced inspection. We met with facility representatives noted above at the opening meeting. We presented our credentials and informed facility personnel that this was an EPA inspection to determine compliance with the Clean Air Act (CAA) Sections 112(r)(1) and 112(r)(7). The scope of the inspection was a partial compliance evaluation (PCE) and included evaluation of the facility's compliance with 40 C.F.R. Part 68 – Chemical Accident Prevention provisions.

FACILITY DESCRIPTION

The Enterprise GC LLC (EPCO) Texas City Terminal receives and distributes refinery grade propylene, refinery grade butane, propane, butane, isobutane, and butane/butylene mix. The facility also has nine liquified petroleum gas storage tanks, and an area for the loading/unloading of trucks and rail cars. The facility handles regulated flammable chemical mixtures above the RMP threshold quantity. There are no listed toxic substances stored at the facility which exceed their respective threshold quantities. EPCO began its current ownership and operation in 2002. There are four full-time employees at this non-union facility. The facility operates 24 hours a day, 7 days a week.

Section II – OBSERVATIONS

We conducted a walk-through of the facility, accompanied by facility representatives, to observe the facility process equipment, and overall operations. We used the Forward Looking Infrared (FLIR™) Series GF320 camera, and observed no spills, leaks, or fugitive hydrocarbon emission trails. The findings are found on the RMP Program Level 3 Checklist, located in **Appendix #1**.

During the walk-through, we observed that the facility was missing proper markings on piping (Photo Nos. 1, 2, 3 4 & 5 located in **Appendix #2**) – e.g., direction of flow, color-coding to identify the hazardous material present, placement of pipe labels, and type and size of letters on pipe labels – as required by the American National Standards Institute (ANSI)/the American Society of Mechanical Engineers (ASME) Standard A13.1 (ANSI/ASME A13.1), *Scheme for the Identification of Piping Systems*. This standard is considered a recognized and generally accepted good engineering practice for above ground piping systems.

Section III – AREAS OF CONCERN

Close-out Meeting – We convened a closing meeting on Thursday, May 11, 2023, to discuss the Area of Concern (AOC) noted during the inspection, the inspection completion process, and to answer questions from EPCO personnel.

AOC 1. 40 C.F.R. § 68.65(d)(2) – Process Safety Information

(d) Information pertaining to the equipment in the process. (2) The owner or operator shall document that equipment complies with recognized and generally accepted good engineering practices.

EPCO failed to properly label piping for process equipment, as required by American National Standards Institutes (ANSI)/American Society of Mechanical Engineers (ASME) Standard A13.1.

On May 18, 2023, EPCO provided additional documentation stating its justification for the Refinery Grade Propylene Surge Tank 57029-PV17.012 and associated piping being U.S. Department of Transportation jurisdictional.

Section IV – FOLLOW UP

Additional information and documentation were provided after the inspection as noted above.

Section V – LIST OF APPENDICES

Appendix #1 – RMP Program 1 Checklist

Inspection Symbol Key: Y - Yes, N - No, N/A - Not Applicable; S - Satisfactory, M - Marginal,
U – Unsatisfactory.

Appendix #2 – Photo Log