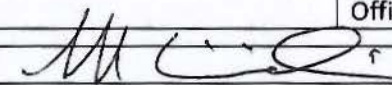
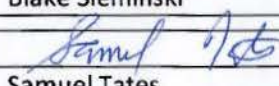




**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	August 7-10, 2017		
Media:	Air		
Regulatory Program(s)	Clean Air Act Section 112(r) and 40 C.F.R. Part 68 Chemical Accident Prevention Provisions		
Company Name:	Targa Resources Inc.		
Facility Name:	Galena Park Marine Terminal		
Facility Physical Location:	12510 American Petroleum Road		
(city, state, zip code)	Galena Park, Texas 77547		
Mailing address:	12510 American Petroleum Road		
(city, state, zip code)	Galena Park, Texas 77547		
County/Parish:	Harris		
Facility Contact:	David Clark – (713)450-7206	Area Manager	
	dbclark@targaresources.com		
FRS Number:	110023009689		
Identification/Permit Number:			
Media Number:	EPA Facility Identifier: 100000148379		
NAICS:	42471 Petroleum Bulk Stations & Terminals		
SIC:	5171 Petroleum Bulk Stations & Terminals		
Personnel participating in inspection:			
David Clark	Targa Resources Inc.	Area Manager	713-450-7206
Bret Peterson	Targa Resources Inc.	EHS	713-450-7200
Brittany Roca	Targa Resources Inc.	ESH	713-450-7200
Jarrod Gregg	Targa Resources Inc.	Manager EHS Gulf Coast	713-450-7200
Jenen Barrillas	Targa Resources Inc.	ESH	713-450-7200
Joseph Cooper	Targa Resources Inc.	ESH	713-450-7200
Richie Cooper	Targa Resources Inc.	Maintenance Supervisor	713-450-7200
Charlie Pelton	Targa Resources Inc.	MI Inspector	713-450-7200
Gery Gill	Targa Resources Inc.	OPS Supervisor	713-450-7200
Ken Murray	Targa Resources Inc.	I&E Supervisor	713-450-7200
Nolan Fleming	Targa Resources Inc.	ECS Equipment Manager	713-450-7206
Javier Ventura	Targa Resources Inc.	Sr. Safety Specialist	713-450-7206
Tony Robledo	US EPA	Inspector/ Enforcement Officer	214-665-8182
Blake Sieminski	US EPA	Inspector/ Enforcement Officer	214-665-8062
EPA Lead Inspector Signature/Date	 Blake Sieminski		10/10/2017 Date
Supervisor Signature/Date	 Samuel Tate		10/10/2017 Date

Section I - INTRODUCTION

PURPOSE OF THE INSPECTION

United States Environmental Protection Agency (EPA) Region 6 inspectors Blake Sieminski and Tony Robledo arrived at the Galena Park Marine Terminal at approximately 9:00 a.m. on Tuesday, August 7, 2017, for an announced inspection. The inspectors met with David Clark, Area Manager, and multiple Targa Resources Inc. (Targa) employees. Tony Robledo presented his credentials and informed them that this was an EPA inspection to determine compliance with the facility's Chemical Accident Prevention Provisions program. The scope of the inspection was a partial compliance evaluation (PCE) and included evaluation of the compliance of the facility with the Clean Air Act (CAA) Section 112(r) and the Chemical Accident Prevention Provisions (40 C.F.R. Part 68). The Galena Park Marine Terminal (GPMT) is listed as a Risk Management Plan (RMP) Program three (3) facility. Brittany Roca was the employee representative available to participate in the inspection. The GPMT is a non-union facility. The Texas Commission on Environmental Quality was notified of this PCE inspection.

Table 1: Opening Meeting Attendance; Tuesday August 7, 2017

David Clark	Targa Resources Inc.	Area Manager
Bret Peterson	Targa Resources Inc.	EHS
Brittany Roca	Targa Resources Inc.	ESH
Jarrold Gregg	Targa Resources Inc.	Manager EHS Gulf Coast
Jenen Barrillas	Targa Resources Inc.	ESH
Joseph Cooper	Targa Resources Inc.	ESH
Nolan Fleming	Targa Resources Inc.	ECS Equipment Manager
Javier Ventura	Targa Resources Inc.	Sr. Safety Specialist
Tony Robledo	US EPA	Inspector/ Enforcement Officer
Blake Sieminski	US EPA	Inspector/ Enforcement Officer

FACILITY DESCRIPTION

Targa Resources Inc., operates a petroleum bulk station and terminal. The facility is located in Galena Park, Texas. GPMT is a facility which receives and delivers liquefied petroleum gases (both mixed and pure), olefins, and chemical feedstocks by ships, barges, trucks, and pipelines. The facility also receives motor gasoline, diesel, and aviation fuels in the same methods for delivery to the Chevron Products Terminal located onsite. The products onsite include propane, butanes, mixed pentanes (natural gasoline), pentane, isoprene and propane-propylene mix. The facility has 26 full time employees on site.

Section II – OBSERVATIONS

On Wednesday, August 9, 2017, Tony Robledo and I accompanied by David Clark and other GPMT personnel conducted a site walk-through of the facility to observe the covered process, equipment, and operations. The facility has eight (8) distillation columns, four (4) hydrogenation reactors and ninety-four (94) storage tanks. Targa provided a trained operator with a FLIR® camera and observed no spills, leaks, or air emissions.

40 C.F.R. Part 68 – CHEMICAL ACCIDENT PREVENTION PROVISION

Subpart A – General

40 C.F.R. § 68.10 Applicability - I observed that GPMT is a stationary source, with a Clean Air Act Title V permit that has more than a threshold quantity of regulated substances in their process. GPMT re-submitted a RMP (5-year update as required by 40 CFR 68.190 (b)(1)) on September 2, 2014, that described the process containing flammables held at more than a threshold quantity. GPMT is subject to the Occupational Safety and Health Administration's (OSHA) Process Safety Management (PSM) Standard (29 CFR 1910.119). This facility is regulated by 29 CFR 1910.119 (Process Safety Management of Highly Hazardous Chemicals), 1910.38 (Employee Emergency Plans), 1910.120 (Hazardous Waste and Emergency Response), 40 CFR 112 (Spill Prevention Control and Countermeasure), State and Federal EPCRA Rules/Laws, as well as other federal, state and local regulations which are in place to reduce the potential for the release of highly hazardous chemicals

40 C.F.R. § 68.12 General Requirements - I reviewed the re-submission of GPMT's RMP that was re-submitted on September 2, 2014, that lists flammable chemicals for a Program Level 3 process.

40 C.F.R. § 68.15 Management - GPMT developed a management system to oversee the implementation of the risk management program elements. The organizational chart that was provided to me outlined the positions to implement the individual elements of the RMP, as required by this subpart.

Subpart B – Hazard Assessment

40 C.F.R. § 68.20 Applicability - GPMT is a Program 3 stationary source subject to this part. The facility is required to prepare an offsite consequence analysis and complete a five-year accident history.

40 C.F.R. § 68.22 Offsite Consequence Analysis parameters - I reviewed the offsite consequence analysis and supporting documentation. I reviewed the documents and discussed with Brittany Roca to assure the data was accurate. I spoke with David Clark about the parameters used by GPMT to document this data.

40 C.F.R. § 68.25 Worst-case Release Scenario Analysis - GPMT identified and documented a worse-case release scenario analysis for the RMP covered flammable substances. The distance to endpoint was done by using the methodology in the RMP Offsite Consequence Analysis Guidance. The distance to the endpoint for flammable substances was calculated using RMP*Comp™.

40 C.F.R. § 68.28 Alternative Release Scenario Analysis - GPMT identified and analyzed at least one alternative release scenario for flammable substances held in the covered process. The distance to the endpoint was calculated using RMP*Comp™.

40 C.F.R. § 68.30 Defining Offsite Impacts-Population - I discussed with GPMT personnel about the completed offsite consequence analysis. GPMT used the year 2010 Census Bureau population data to calculate population numbers reported in their RMP.

40 C.F.R. § 68.33 Defining Offsite Impacts-Environment - GPMT provided maps that identified the potential offsite impacts and identified public receptors.

40 C.F.R. § 68.36 Review and Update - I reviewed GPMT's documentation that illustrated reviews and updates regarding the offsite consequences are occurring at least every five years.

40 C.F.R. § 68.39 Documentation - GPMT provided documents of the offsite consequence analysis data. For worst-case and alternative case scenarios, a description of the vessel or pipeline, the substance selected as worst-case, and the rationale for selection was included; likewise, assumptions included use of any administrative controls and any passive mitigation that were assumed to limit the quantity that could be released, estimated quantity released, release rate, and duration of release. The methodology used to determine distance to endpoint was documented by the facility. The data used to estimate population was provided in the form of maps that had the distance to endpoint labeled with a circle from the emission point.

40 C.F.R. § 68.42 Five-year Accident History - GPMT did not report any accidental release(s) in their RMP that resulted in deaths, injuries, evacuations, or property damage.

Subpart D – Program 3 Prevention Program

40 C.F.R. § 68.65 Process Safety Information - I reviewed various process safety information for the RMP units at GPMT, and all information reviewed met the requirements of this subpart.

40 C.F.R. § 68.67 Process Hazard Analysis - I reviewed the Process Hazard Analysis (PHA) for the RMP process. The April 4, 2014, PHA was conducted using the Hazard and Operability Study (HAZOP) analysis technique.

40 C.F.R. § 68.69 Operating Procedures - I reviewed the operating procedures that were requested from GPMT. GPMT uses a paper and electronic document management system to maintain its operating

procedures. I reviewed and discussed with GPMT personnel operating procedures which included the SOP certification procedure, confined space entry, and lockout/ tag out procedures. I observed, based on GPMT provided documentation, that its operating procedures were certified, current, accurate, and that procedures had been reviewed as often as necessary. GPMT used a single certification document for certifying operating procedures annually, and met all the requirements as required by this subpart.

40 C.F.R. § 68.71 Training - Gery Gill gave an overview of their training program. I requested and was provided the training files for four (4) employees at various experience levels. Of the employee files reviewed, refresher training had been provided at least every three years.

40 C.F.R. § 68.73 Mechanical Integrity - I requested and was provided mechanical integrity records for randomly selected inspections of RMP covered equipment, and the written procedure for maintaining the integrity of the process. I spoke with the Charlie Pelton and he showed me the data in their Data Management and Analysis for Process Systems for the bullet tank farm, as well as other spherical vessels. I reviewed equipment inspection records for tank W-14, which is the primary tank used in the offsite consequence analysis, and randomly selected tanks 102 and 114 from the bullet tank farm, and sphere 55.

40 C.F.R. § 68.75 Management of Change (MOC) - I reviewed GPMT's written procedure for MOC and discussed the documentation with site personnel. I reviewed one MOC dated August 11, 2014. The MOCs were implemented and tracked using an electronic system.

40 C.F.R. § 68.77 Pre-startup Review - GPMT provided documentation regarding its pre-startup safety review process.

40 C.F.R. § 68.79 Compliance Audits - I requested and reviewed the last two RMP compliance audits; the most recent was on February 5, 2014, and completed on March 5, 2014.

40 C.F.R. § 68.81 Incident Investigation - I requested a complete list of incident reports/ investigations which resulted in, or could reasonably have resulted in, a catastrophic release of a regulated substance for the last five years. GPMT did not have any incident reports/ investigations that met these criteria.

40 C.F.R. § 68.83 Employee Participation - I reviewed GPMT's written plan of action regarding employee participation and its implementation in their RMP. GPMT's written plan met the requirements of this subpart.

40 C.F.R. § 68.85 Hot Work Permit - I discussed the process for conducting hot work onsite and reviewed several hot work permits. The hot work permits that I reviewed looked satisfactory, and met the requirements of this subpart.

40 C.F.R. § 68.87 Contractors - I spoke with Brittany Roca about the process of contractor selection. GPMT uses ISNetworld to conduct its contractor selection and a vetting process by GPMT management. GPMT assures that all contractors that may work onsite have been trained on the potential hazards related to both the process equipment and the work that the contractor may perform.

Subpart E – Emergency Response

40 C.F.R. § 68.90 Applicability - GPMT employees are first responders that respond to both structural fires and chemical fires resulting from releases onsite.

40 C.F.R. § 68.95 Emergency Response Program - I requested and reviewed the GPMT Emergency Response Plan, and discussed the emergency response program with appropriate GPMT personnel.

Subpart G - Risk Management Plan

40 C.F.R. § 68.190 Updates - GPMT's RMP was re-submitted on September 2, 2014 and there have been no updates since this re-submission.

40 C.F.R. § 68.195 Required Corrections - The next RMP re-submission is due by September 2, 2019, unless an update or correction is required by 40 C.F.R. § 68.190 and § 68.195.

Table 2: Closing Meeting Attendance; Thursday August 10, 2017

David Clark	Targa Resources Inc.	Area Manager
Bret Peterson	Targa Resources Inc.	EHS
Brittany Roca	Targa Resources Inc.	ESH
Richie Cooper	Targa Resources Inc.	Maintenance Supervisor
Charlie Pelton	Targa Resources Inc.	MI Inspector
Gery Gill	Targa Resources Inc.	OPS Supervisor
Ken Murray	Targa Resources Inc.	I&E Supervisor
Javier Ventura	Targa Resources Inc.	Sr. Safety Specialist
Tony Robledo	US EPA	Inspector/ Enforcement Officer
Blake Sieminski	US EPA	Inspector/ Enforcement Officer

Section III – AREAS OF CONCERN

None.

Section IV – FOLLOW UP

GPMT provided additional documents which were received and reviewed by EPA after exiting the facility on August 10, 2017.

Section V – LIST OF APPENDICES

Sign in sheets for opening and closing meetings.