



Region 6 Enforcement and Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	04/03/2023 - 04/05/2023	
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:	Targa Resources Corporation	
Facility Name:	Galena Park Marine Terminal	
Facility Physical Location:	12510 American Petroleum Road	
(city, state, zip code)	Galena Park, Texas 77547	
Mailing address:	811 Louisiana Suite 2100	
(city, state, zip code)	Houston, Texas 77002	
County/Parish:	Harris	
Facility Contact/Title:	Michael Mullis	Area Manager
(email address)	MMullis@targaresources.com	
FRS Number:	110023009689	
Identification/Permit Number:	O-00614	
Media Identifier Number:	RMP 10000 0014 8379	
NAICS:	424710– Petroleum Bulk Stations and Terminals	
Personnel participating in inspection:		
Tony Robledo	U.S. EPA	Inspector/Enforcement Officer
Michael Mullis	Targa Resources Corporation	Area Manager
Joseph Cooper	Targa Resources Corporation	Safety Supervisor
Ryan Perna	Targa Resources Corporation	Environmental Health & Safety Manager
Bryan McMurray	Targa Resources Corporation	Director, Environmental Health & Safety
Scott Outwater	Targa Resources Corporation	Senior Environmental Specialist
Ken Murrery	Targa Resources Corporation	Superintendent
EPA Lead Inspector Signature/Date		
	Tony Robledo	
Supervisor Signature/Date		
	Samuel Tates	

Section I – INTRODUCTION PURPOSE OF THE INSPECTON

I, the Environmental Protection Agency (EPA) Region 6 inspector Tony Robledo, arrived at the Targa Resources Corporation facility at approximately 9:00 a.m. on April 3, 2023, for an announced inspection. I met with facility representatives noted above at the opening meeting. I presented my credentials and informed them 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 Targa Resources Corporation (Targa) Galena Park Marine Terminal 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 ethanol using the same methods for delivery to the Chevron Products Terminal located on site. 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. The Targa Terminal began its current ownership and operation in 2007. There are 75 full-time employees at this non-union facility. The facility operates 24 hours a day, 7 days a week.

Section II – OBSERVATIONS

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

During the walk-through, I observed that the facility was missing proper markings on piping (Photo Nos. 1, 2, 3 & 4 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. Based on additional records and other information gathered during the inspection, other areas of concern regarding RMP elements were identified.

Section III – AREAS OF CONCERN

Close-out Meeting – I convened a closing meeting on Wednesday, April 5, 2023, to discuss the Areas of Concern (AOC) noted during the inspection, the inspection completion process, and to answer questions from Targa Resources personnel.

AOC 1. 40 C.F.R. § 68.15(c) – Management

(c) When responsibility for implementing individual requirements of this part is assigned to persons other than the person identified under paragraph (b) of this section, the names or positions of these people shall be documented and the lines of authority defined through an organization chart or similar

document.

Targa failed to provide documentation that identified the persons responsible for implementing individual requirements of the risk management program, with lines of authority through an organization chart or similar document.

AOC 2. 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.

Targa 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 April 14, 2023, Targa provided a copy of an internal Occupational Safety and Health Agency (OSHA) Memorandum dated May 14, 1996, regarding chemical exposures from industrial valve and piping systems. The OSHA memorandum states that, “While labeling of pipes cannot be required, the hazard communication standard does require that the employer address the hazards of unlabeled piping systems in a written communication program and the information be provided through training to workers.” Targa also provided operator training completion records for its written hazard communication program.

AOC 3. 40 C.F.R. § 68.69(a)(1)(iv) – Operating Procedures

(a) The owner or operator shall develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information and shall address at least the following elements. (1) Steps for each operating phase: (iv) Emergency shutdown including the conditions under which emergency shutdown is required, and the assignment of shutdown responsibility to qualified operators to ensure that emergency shutdown is executed in a safe and timely manner.

Targa failed to document emergency shutdown procedures for the Ethylene Unit, LEP-2 Unit, and the LEP-3 Unit to include the conditions under which emergency shutdown is required, and the assignment of shutdown responsibility to qualified operators to ensure that emergency shutdown is executed in a safe and timely manner.

On April 14, 2023, Targa provided Galena Park Terminal Facility Emergency Operations procedures for the Ethylene Unit (Document No. 13MHO31-TW1008), LEP-2 Unit (Document No. 13MH712-TW1008), and the LEP-3 Unit (Document No. 20MHO92-TW1008).

AOC 4. 40 C.F.R. § 68.73(d)(3) – Mechanical Integrity

(3) The frequency of inspections and tests of process equipment shall be consistent with applicable manufacturers' recommendations and good engineering practices, and more frequently if determined to be necessary by prior operating experience.

Targa failed to conduct piping circuit inspections and tests within the proper frequency in accordance with API 570 Fourth Edition, February 2016, *Piping Inspection Code: In-service Inspection, Rating, Repair, and*

Alteration of Piping Systems (API 570), Section 6.3.4. Piping Services Classes and Table 1.

Of the 783 total Class 1 piping circuits at the facility only 226 (29%) had been inspected within the five-year API 570 standard, leaving 557 (71%) of piping circuits that remained to be inspected. It should be noted that the remaining inspections are currently underway and are scheduled to be completed by the end of 2023 calendar year.

Section IV – FOLLOW UP

On April 14, 2023, Targa provided additional information and documentation 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