

United States Environmental Protection Agency / Region 4

Risk Management Program Inspection Report

Shell- Nashville Terminal

Nashville, Tennessee

June 22, 2021

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 storage and blending processes at the Shell Terminal 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 June 22, 2021, consisted of a discussion of and request for program documentation as well as a site review of various aspects of facility operations. Personnel from the facility participated throughout the inspection. Documents were provided by email for review off-site. This report will provide a background of the facility and a listing of observations.

2.0 Background

The Shell-Nashville Terminal facility is located in Nashville, Tennessee. This facility transfers and stores refined product (regular/premium gasoline and diesel fuel) and handles product additives, including the liquefied butane blending system (direct injection into refined product lines). The RMP covers the butane blending system including the associated piping, the LPG vessel, the blending skid, sampling unit, and the truck offloading station product injection points. The process is regulated as program level 3. According to facility records, the facility can have a maximum of 250,000 pounds of butane on site. The gas processing 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: Jordan Noles, EPA

Inspector-In-Training: Bethany Terpin, EPA

Date of Facility Visit: June 22, 2021

Facility Identification

Name: Shell- Nashville Terminal
Street Address: 1717 61st Avenue, North
City: Nashville County: Davidson State: Tennessee Zip: 37209
EPA Facility ID No: 1000 0019 3774
Dun & Bradstreet (D&B) No: 4294737
Latitude: 36.169788
Longitude: -86.858541

Name, address and phone of corporate parent company:
Owner/Operator: Equilon Enterprises LLC dba Shell Oil Products US
Mailing Address: 910 Louisiana St Ste 2
City: Houston State: Texas Zip: 77002
Phone: (615) 350-7077

Name, title, and email of person responsible for 40 C.F.R. Part 68 implementation:
Name: Erin Tade
Title: Facilities Manager
Email: erin.tade@shell.com

Name and title of emergency contact:
Name: Kevin Clark
Title: Terminal Operations Supervisor
Day phone: (865) 599-0579
24-hour Phone: (917) 682-1178
Email: kevin.clark@shell.com

Name and titles of stationary source personnel involved in site inspection (*accompanied site tours, provided documents and explanations*):
Name: Lisa Barfield
Title: Terminal Manager
Phone: (251) 679-7170
Email: lisa.barfield@shell.com

Name: Kevin Clark
Title: Terminal Operations Supervisor
Phone: 865-599-0579
Email: kevin.clark@shell.com

Note: This is not a union facility.

Date and Program Levels of Submitted Risk Management Plan

Date of initial submission: December 13, 2005

Date of most recent submissions: October 13, 2016

Process as reported in RMP: Butane Blending System

Process: Butane Blending

Process ID: 1000075495

Program Level as reported in RMP: 3

NAICS code: 42471 (Petroleum Bulk Stations and Terminals)

3.0 Observations

The inspection of the Shell- Nashville Terminal 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. EPA inspectors requested paperwork associated with the facility’s Risk Management Plan (RMPlan) to be sent by email due to risks associated with the COVID-19 pandemic. The documents were later reviewed by EPA inspectors off-site. At the time of the drafting of this report, some documents are still being received and will be reviewed at a later date. The discussion was followed by a tour of the facility’s butane storage and blending areas. An inspection out-brief was conducted where EPA inspectors described their observations. Observations from the RMP inspection at the Shell Terminal facility are discussed below:

1. 40 C.F.R. § 68.79(d) requires the owner or operator to promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected.
 - The facility conducted a compliance audit of the covered process in 2017. Eleven findings were identified, but only one was documented as being completed.
2. 40 C.F.R. § 68.195(b) requires the owner or operator to submit a correction within one month of any change in the emergency contact information required under §68.160(b)(6).
 - At the time of the inspection, Jun Dufresne was listed as the emergency contact in the facility’s RMPlan. Mr. Dufresne left the facility in 2018; therefore, the emergency contact information is out of date.

Inspection Report,

Prepared by:

**Noles,
Jordan**

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Noles, Jordan
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Jordan Noles, Inspector
North Air Enforcement Section
U.S. EPA Region 4

Date

Approved by:

**JASON
DRESSLER**

Digitally signed by JASON
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Date: 2021.08.18 17:39:21
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Jason Dressler, Section Chief
North Air Enforcement Section
U.S. EPA Region 4

Date