EPA United States Environmental Protection Agency

Region 6 Enforcement and Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	09/20/2022 – 09/21/2022	
Media Program:	Air	
Regulatory Program(s)	Clean Air Act Section 112(r) and 40 Code of Federal Regulations (C.F.R.) Part 68 Chemical Accident Risk Management Plan (RMP) Program 2	
Company Name:	Kinder Morgan Energy Partners LP	
Facility Name:	KM Liquids Terminals LLC	
Facility Physical Location:	530 North Witter	
(city, state, zip code)	Pasadena, Texas 77506	
Mailing address:	300 Beltway Green Boulevard	
(city, state, zip code)	Pasadena, Texas 77503	
County/Parish:	Harris	
Facility Contact:	Keith Cormier	Operations Manager
	Keith_Cormier@kindermorgan.com	
FRS Number:	110000504892 / TX0000004820100092	
Identification/Permit Number:	CAA Title V O984	
Media Identifier Number:	RMP 1000 0011 8124	
NAICS:	493190 Other Warehousing and Storage	

Personnel participating in inspection:		
Tony Robledo	U.S. EPA	Inspector/Enforcement Officer
Zackary Ward	Kinder Morgan	Emergency Response Manager
Greg Allen	Kinder Morgan	Environmental Health & Safety Manager
Corey Banks	Kinder Morgan	Process Safety Management/Risk Management Plan Specialist
Gabriel Andrade	Kinder Morgan	Risk Management Plan Manager
Keith Cormier	Kinder Morgan	Operations Manager
Chuck Richey	Kinder Morgan	Maintenance Manager
Scott Eady	Kinder Morgan	Director Environmental Health & Safety

EPA Lead Inspector Signature/Date	ANTHONY ROBLEDO Digitally signed by ANTHONY ROBLEDO DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=ANTHONY ROBLEDO, 0.9.2342.19200300.100.1.1=68001003655529 Date: 2022.09.28 09:47:04 -05'00'
	Tony Robledo
Supervisor Signature/Date	SAMUEL TATES Digitally signed by SAMUEL TATES Date: 2022.09.28 12:20:29 -05'00'
	Samuel Tates

Section I – INTRODUCTION PURPOSE OF THE INSPECTION

I, Environmental Protection Agency (EPA) Region 6 inspector Tony Robledo, arrived at the Kinder Morgan Energy Partners LP (Kinder Morgan), KM Liquids Terminals LLC at approximately 9:00 a.m. on September 20, 2022, for an announced inspection. I met with Kinder Morgan managers and staff 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 compliance with 40 C.F.R. Part 68 – Chemical Accident Prevention Provisions.

FACILITY DESCRIPTION

The primary purpose of the facility is to temporarily store, break bulk[1], and distribute Vinyl Acetate Monomer (VAM) to a single end user. VAM is used as a raw material for manufacturing polyvinyl resins such as those used in latex paints, paper coating, adhesives, textile finishing, and safety glass interlayers. VAM is received by barge and is transferred to two storage tanks. VAM is distributed to a single customer via pipeline. The facility also has equipment for unloading ships, barges, rail cars and tank trucks containing other materials. The facility handles one regulated toxic chemical (VAM) above RMP threshold quantities. The facility was constructed in 1953 and acquired by Kinder Morgan in the early 2000's. There are 150 full-time employees at this union and non-union represented facility. The plant operates 24 hours a day, 7 days a week.

Section II – OBSERVATIONS

I conducted a walk-through of the facility, accompanied by Kinder Morgan personnel, to observe the facility process, equipment, and vessels. I observed that the facility was missing proper markings on VAM piping (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 American National Standards Institutes (ANSI)/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. I also observed no spills, leaks, or fugitive hydrocarbon emission trails with the Forward Looking Infrared (FLIR™) Series GF77 optical gas imaging camera. Additional observations and findings are found on the RMP Program Level 2 Checklist, located in **Appendix #1**.

Section III – AREAS OF CONCERN

Closing Meeting – I convened a closing meeting on Wednesday, September 21, 2022, to discuss the Areas of Concern (AOC) noted during the inspection, the inspection completion process, and to answer questions from Kinder Morgan personnel.

AOC 1 – 40 CFR § 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.

[1] Break bulk is a shipping term for cargo that does not fit in a standard shipping container or cargo bin. Break bulk cargo is instead transported individually in bags, boxes, crates, drums, or barrels.

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

Section IV – FOLLOW UP

There were no additional records requested and no additional follow up for this inspection.

Section V – LIST OF APPENDICES

Appendix #1 – RMP Program 2 Checklist
Inspection Symbol Key: Y - Yes, N - No, N/A - Not Applicable; S - Satisfactory, M - Marginal, U - Unsatisfactory.