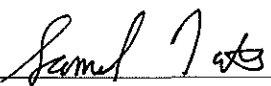


**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	10/24/2018 – 10/25/2018		
Media:	Air		
Regulatory Program(s)	Clean Air Act Section 112(r) and 40 C.F.R. Part 68 Chemical Accident Prevention Provisions		
Company Name:	DCP Midstream LP		
Facility Name:	Okarche Gas Plant		
Facility Physical Location:	30398 N. 2760 Road		
(city, state, zip code)	Okarche, Oklahoma 73762		
Mailing address:	(same as above)		
(city, state, zip code)	(same as above)		
County/Parish:	Kingfisher		
Facility Contact:	Jason P. Dean	Plant Supervisor	
	JPDean@dcpmidstream.com		
FRS Number:	110007161533		
Identification/Permit Number:	Air Title V Permit No: 2013-1557-TVR2 (M-3)		
Media Number:	RMP EPA Facility Identifier: 100000013157		
NAICS:	211112 = Natural Gas Liquid Extraction		
Personnel participating in inspection:			
Tony Robledo	US EPA/6EN-AS	Inspector	(214) 665-8182
Jason P. Dean	DCP Midstream LP	Plant Supervisor	(580) 273-1066
EPA Lead Inspector Signature/Date	 Tony Robledo		11-27-18 Date
Supervisor Signature/Date	 Samuel Tate		12/4/2018 Date

Section I - INTRODUCTION

PURPOSE OF THE INSPECTION

I, United States Environmental Protection Agency (EPA) Region 6 Inspector, Tony Robledo arrived at the DCP Midstream LP's (DCP) Okarche Gas Plant at approximately 9:00 a.m. on October 24, 2018, for an announced inspection. Oklahoma Department of Environmental Quality (ODEQ) inspectors, Jon Livermore, and Curtis Mitchell also participated in this inspection. I conducted an opening meeting with the following people in attendance identified in Table 1.

Table 1: Opening and Close Out Meeting Attendance

Name	Position
Jason P. Dean	DCP Plant Supervisor
Bryant McDowell	DCP Health Safety/ Process Safety Management Manager
Patrick Schuman	DCP Health Safety/ Process Safety Management Manager
Tyler Carroll	DCP Process Safety Management Coordinator
Lonnie Covalt	DCP Environmental Principal
Jon Livermore	ODEQ Environmental Protection Specialist IV
Curtis Mitchell	ODEQ Environmental Protection Specialist I
Tony Robledo	EPA Inspector

I presented my credentials to all attendees at the opening meeting and informed them that this EPA inspection was to determine compliance with Clean Air Act Sections 112(r)(1) and 112(r)(7). The scope of the inspection was a partial compliance evaluation (PCE) and included an evaluation of the compliance with 40 C.F.R. Part 68 – Chemical Accident Prevention Provisions.

FACILITY DESCRIPTION

The Okarche Gas Plant is a natural gas processing plant that extracts hydrocarbon liquids from raw natural gas streams. The raw natural gas streams received from surrounding booster stations are combined and processed to produce four product streams: a high methane-content residue gas stream for sale as natural gas; a natural gas liquids product stream for sale; a slop oil stream which is sold to refineries; and a wastewater stream. There are no listed toxic substances, only flammable substances, which exceed their respective threshold quantities stored at this facility. The facility produces approximately 160 million cubic feet per day of natural gas. The facility has four full-time employees.

Section II – OBSERVATIONS

I conducted a walk-through of the facility on October 25, 2018 and was accompanied by DCP and ODEQ personnel to observe the facility process, equipment, storage tanks, and operation. I observed no spills, leaks, or unpermitted air emissions with the FLIR™ Series GF320 infrared camera.

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

Subpart A – General

40 C.F.R. § 68.10 Applicability – DCP is an owner and operator of a stationary source that has more than a threshold quantity of regulated flammable substances, listed in 40 C.F.R. § 68.130, in a process, and is subject to the Chemical Accident Prevention Provisions. DCP listed the NAICS code (211112) natural gas liquid extraction, as the process in its Risk Management Plan (RMP). The DCP facility process is also subject to the Occupational Safety and Health Administration (OSHA) process safety management standard, 29 C.F.R. § 1910.119. These factors make the process at the DCP facility a Program 3 and subject to 40 C.F.R. § 68.10(d).

40 C.F.R. § 68.12 General Requirements – DCP re-submitted a RMP five-year update on April 8, 2016. This submittal lists a covered process for Program 3. This requires the facility to develop and implement a management system, conduct a hazard assessment, implement the prevention requirements of 40 C.F.R. § 68.65 - § 68.87, develop and implement an emergency response program, and submit the data elements from 40 C.F.R. § 68.175 in their RMP.

40 C.F.R. § 68.15 Management – DCP has an established management system to oversee the implementation of the risk management program elements and has assigned a qualified person or position that has the overall responsibility for the development, implementation, and integration of the risk management program elements. DCP facility personnel provided an organization chart which documents the persons responsible for implementing the individual requirements of the RMP required by this subpart.

Subpart B – Hazard Assessment

40 C.F.R. § 68.20 Applicability – DCP is an owner or operator of a stationary source subject to this subpart with a Program 3 process that must prepare an offsite consequence analysis which is described in § 68.25 of this subpart, complete the five-year accident history as provided in § 68.42, and comply with all sections in this subpart for this process.

40 C.F.R. § 68.22 Offsite Consequence Analysis Parameters – I requested documentation of the offsite consequences analysis. I reviewed the documentation provided and had a discussion with appropriate DCP facility personnel. DCP applied the offsite consequence analysis parameters as required by this subpart.

40 C.F.R. § 68.25 Worst-Case Release Scenario Analysis – DCP identified and reported a worst-case release scenario analysis for the RMP covered flammable substances. I requested documentation of the worst-case release scenario analysis. I reviewed the documentation provided and had a discussion with appropriate DCP facility personnel. DCP selected two inlet receiving pressure vessels (numbered 95-2a and 95-2b) for the worst-case release scenario. DCP used EPA's RMP*Comp to determine the distance to the endpoint in the worst-case release scenario. DCP used the proper guidance endpoints for flammables as required by this subpart.

40 C.F.R. § 68.28 Alternative Release Scenario Analysis – DCP identified and reported an alternative release scenario for the RMP covered flammable substances. I requested documentation of the alternative release scenario analysis. I reviewed the documentation provided and had a discussion with appropriate DCP facility personnel. DCP selected its propane unloading terminal as its alternative

release scenario. DCP used EPA's RMP*Comp to calculate the distance to the endpoint in the flammables alternative release scenario. DCP used the proper endpoints for flammables as required by this subpart. No mitigation systems were considered by the facility. The five-year accident history in 40 C.F.R. § 68.42, and the failure scenarios identified in 40 C.F.R. § 68.50 were considered in selecting the alternate release scenario.

40 C.F.R. § 68.30 Defining Offsite Impacts – Population – The documentation I reviewed contained a map with the circles delineating the areas covered by the offsite impact. Population numbers were verified with appropriate mapping software. DCP reported these numbers to two significant figures.

40 C.F.R. § 68.33 Defining Offsite Impacts – Environment – The maps I reviewed identified the potential offsite impacts and any identified public receptors.

40 C.F.R. § 68.36 Review and Update – DCP reviewed and updated its RMP on April 8, 2016. This RMP submittal identified process chemicals of isopentane, isobutane, pentane, butane, ethane, propane, methane, and flammable mixtures. DCP reported no changes, to include any increases or decreases, of its process chemicals.

40 C.F.R. § 68.39 Documentation – I reviewed documentation for the worst-case scenarios that contained a description of the vessel or pipeline and substance selected as worst case, assumptions and parameters used, and the rationale for selection. The documentation also included the anticipated effect of the controls and mitigation on the release quantity and rate. DCP's documentation of the alternative release scenarios included a description of the scenario identified, assumptions and parameters used, and the rationale for the selection of the specific scenario. The documentation of estimated quantity released, release rate, duration of release, methodology used to determine distance to endpoints, and data used to estimate population and environmental receptors potentially affected was included in the reviewed materials during this inspection.

40 C.F.R. § 68.42 Five Year Accident History – DCP reported no accidents for the five-year accident history in its RMP re-submittal, and no accidents were reported up to the date of this inspection.

Subpart D – Program 3 Prevention Program

40 C.F.R. § 68.65 Process Safety Information – DCP indicated that process safety information is managed using an electronic online system. I reviewed facility process safety information. I also reviewed facility safety data sheets, block flow diagrams, process flow diagrams, and piping and instrumentation diagrams.

40 C.F.R. § 68.67 Process Hazard Analysis – I reviewed DCP's Process Hazard Analysis (PHA) process and procedures. DCP used the hazard and operability study (HAZOP) analysis technique to conduct its PHAs. DCP conducted its two most recent PHA's during 2008-2009, and 2012-2014. I observed that the nodes, which identified process equipment reviewed, were conducted within each of the two PHA's within a five-year time-period. DCP personnel stated that they will use the PHA complete date of October 1, 2014, as the ending date of their last PHA, and will shorten the time-frame to conduct its next PHA which is scheduled to be completed by October 1, 2019. Both PHA's identified findings and recommendations and all findings and recommendations were completed in a timely manner.

40 C.F.R. § 68.69 Operating Procedures – DCP uses a paper and electronic document management system to maintain its operating procedures. I reviewed and discussed with DCP personnel randomly selected operating procedures from various process units, and lockout/tagout procedures. DCP

provided documentation that its operating procedures were certified annually, current, accurate, and that procedures had been reviewed as often as necessary as required by this subpart.

40 C.F.R. § 68.71 Training – I discussed with DCP personnel their training program to include training for new employees and how they insure that the three-year refresher training requirements are met. I requested and received the training records for three full-time employee operators who work at the facility. All training documentation met the requirements of this subpart.

40 C.F.R. § 68.73 Mechanical Integrity – I requested and was provided a procedure used to maintain the ongoing integrity of process equipment. DCP indicated that the mechanical integrity of its process equipment is managed using an electronic system. I discussed mechanical integrity with DCP personnel and included Jamie Nelms, DCP Reliability Supervisor, by phone.

DCP maintains the on-going mechanical integrity of process equipment by following recognized and generally accepted good engineering practices to include the American Petroleum Institute (API) standards. I requested and was provided inspections performed on the following process equipment: pressure relief valves, wastewater storage tank (numbered 95-203), and pressure vessels (number 95-2a and 95-2b). The inspection documentation I observed for this process equipment included the date of the inspection or test, the name of the person who performed the inspection or test, the identification number of the pressure vessel on which the inspection or test was performed, a description of the inspection or test performed, and the results of the inspection or test.

40 C.F.R. § 68.75 Management of Change (MOC) – I reviewed DCP's written procedure for MOC and discussed the MOC process with DCP personnel. I reviewed three specific MOC documents numbered 18-02, 17-22, 17-03. I also reviewed P&ID diagrams associated with the completed MOC's.

40 C.F.R. § 68.77 Pre-startup Review – I reviewed DCP's written Pre-Startup Safety Review (PSSR) procedures. The standard operating procedures for PSSR were final documents.

40 C.F.R. § 68.79 Compliance Audits – I was provided and reviewed two certified RMP compliance audit reports dated February 2-7, 2014, and November 7-11, 2016. The compliance audits evaluated compliance with the provisions of this subpart and were conducted by at least one person knowledgeable in the process. A report of the findings for both audits was developed, and DCP documented that deficiencies had been corrected.

40 C.F.R. § 68.81 Incident Investigation – I reviewed DCP's completed OSHA form 300 of work related Injuries and illness for the past five years and determined that none of the injuries reported were the result of an accidental release. DCP reported no incidents within the past five years from any accidental releases.

40 C.F.R. § 68.83 Employee Participation – I reviewed a written plan of action regarding the implementation of employee participation. This plan was to insure consultation with employees on the conduct and development of process hazards analyses; the development of the other elements of process safety management; to provide the employees with access to process hazard analyses; and to provide all other information required to be developed under this rule. I discussed this document and employee participation with DCP personnel. I also interviewed one full-time operator.

40 C.F.R. § 68.85 Hot Work Permit – I reviewed hot work permits that had been issued by DCP prior to this inspection. The permits met the requirements of this subpart.

40 C.F.R. § 68.87 Contractors – I discussed with DCP personnel the contractor selection process. This discussion included considering the contractor's safety performance, safety programs, training, and qualifications. DCP personnel stated that they use an outside contractor, ISNetwork® to assist in its contractor evaluation process and that contractors it selects must have a high rating. DCP documents that contractors have site-specific safety training.

Subpart E – Emergency Response

40 C.F.R. § 68.90 Applicability – DCP is not designated as a “first responder” in case of an accidental release of a regulated substance.

40 C.F.R. § 68.95 Emergency Response Program – I was provided, reviewed, and discussed with DCP personnel their emergency response plan. DCP reported that it has coordinated response actions with the local fire department, and appropriate mechanisms are in place to notify emergency responders when there is a need for a response. I was provided and did review fire extinguisher monthly and annual inspections reports.

Subpart G—Risk Management Plan

40 C.F.R. § 68.190 Updates – DCP submitted its most recent plan as a five-year update on April 8, 2016. A new five-year update will be due on or before April 8, 2021, or sooner if an update is required by 40 C.F.R. § 68.190 (b)(2) through (b)(7). Updates are required no later than three years after a newly regulated substance is first listed by EPA; no later than the date on which a new regulated substance is first present in an already covered process above a threshold quantity; no later than the date on which a regulated substance is first present above a threshold quantity in a new process; within six months of a change that requires a revised PHA or hazard review; within six months of a change that requires a revised offsite consequence analysis as provided in § 68.36; and within six months of a change that alters the Program level that applied to any covered process.

40 C.F.R. § 68.195 Required Corrections – DCP will have to submit corrections of their RMP, if there is new accident history information, for any accidental release meeting the five-year accident history reporting criteria of § 68.42 and within six months of the release, or by the time the RMP is updated under § 68.190, whichever is earliest. Also, if the emergency contact information changes a submission to correct that information must be submitted within 30 days.

Close Out Meeting – A close out meeting was held on October 25, 2018, at 11:30 a.m. to discuss the areas of concern, recommendations, and the timing of the completion of the inspection report. The people who attended the close out meeting are identified in Table 1.

The DCP PHA process was discussed during the close out meeting. After a review of the PHA documents provided by DCP at the close out meeting, no areas of concern were identified.

Section IV – FOLLOW UP

None.

Section V – LIST OF APPENDICES

Appendix 1 – Sign in sheet from opening and closing meeting.

Date: 10/29/18

Meeting with OKARCHE PLANT - DCP MIDSTREAM LP
Purpose of meeting: RMP CAA 112c INSPECTION

	Name	Title	Representing	e-Mail	Phone
1	Tony Robledo	Inspector	U.S. EPA	robledo.tony@epa.gov	214-665-8182
2	BRYANT MCDOWELL	HS/PSM MANAGER	DCP MIDSTREAM	BAMCDOW@DCPMIDSTREAM.COM	405.435.0625
3	LONNIE COVALT	Env. Principal	DCP	lcovalt@dep.midstream.com	405-605-3884
4	PATRICK SCHUMAN	HS/PSM MANAGER	DCP	pschuman@dep.midstream.com	203-605-1668
5	JON LIVERMORE	EPS I/II IV	ODEQ	Jon.Livermore@DEQ.ok.gov	(405) 620-4888
6	Curtis Mitchell	ERS I/II I	ODEQ	Curtis.Mitchell@DEQ.ok.gov	(405) 501-2356
7	Tyler Carroll	PSM Coordinator	DCP Midstream	jtcarroll@dep.midstream.com	405-263-4205
8	Jason Dean	Plant Supervisor	DCP	jpdcan@dep.midstream.com	580-273-1066
9	JAMIE NELMS	Reliability Supervisor	DCP	JNelm1@dep.midstream.com	405.288.3002
10					
11					
12		V = attended close-out meeting			
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					

[illegible]

1990

Figure 1 is a line graph showing the percentage of total energy expenditure (TEE) for different activities over a 24-hour period. The Y-axis is 'Percentage of TEE' (0-100) and the X-axis is 'Time of Day' (0-24). The activities and their approximate percentages are:

Activity	0-6h	6-12h	12-18h	18-24h
Sleeping	~80%	~80%	~80%	~80%
Resting	~10%	~10%	~10%	~10%
Sitting	~5%	~5%	~5%	~5%
Standing	~5%	~5%	~5%	~5%
Walking	~5%	~5%	~5%	~5%
Running	~5%	~10%	~10%	~10%

100

[illegible]