



Region 6 Enforcement and Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	02/28/2023 - 03/02/2023	
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 3	
Company Name:	Kinder Morgan Tejas Pipeline, LP	
Facility Name:	Texas City Extraction Plant	
Facility Physical Location:	900 Grant Avenue	
(city, state, zip code)	Texas City, Texas 77590	
Mailing address:	P.O. Box 369	
(city, state, zip code)	Texas City, Texas 77592	
County/Parish:	Galveston	
Facility Contact:	Joe Evans	Operations Supervisor
	Joe_Evans@kindermorgan.com	
FRS Number:	110043811514	
Identification/Permit Number:	Permit by Rule Registration No. 25506	
Media Identifier Number:	RMP 1000 0002 9391	
NAICS:	21113 – Natural Gas Extraction	
Personnel participating in inspection:		
Tony Robledo	U.S. EPA	Inspector/Enforcement Officer
Joe Evans	Kinder Morgan	Operations Supervisor
Bobby Arriola	Kinder Morgan	Operations Coordinator
Juan P. Lopez	Kinder Morgan	Operator
Jessica Biela	Kinder Morgan	Operator
Gilbert Jimenez	Kinder Morgan	PSM Specialist
Jésus Oviedo	Kinder Morgan	Mechanical Integrity Engineer
Katrina Chruscik	Kinder Morgan	Environmental Health and Safety Staff Engineer
Mike McKinney	Kinder Morgan	Electrical and Controls Technician
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 Kinder Morgan Tejas Pipeline, LP, Texas City Extraction Plant at approximately 9:00 a.m. on February 28, 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 compliance with 40 C.F.R. Part 68 – Chemical Accident Prevention Provisions.

FACILITY DESCRIPTION

The Texas City Extraction Plant is a natural gas treating facility that separates hydrocarbon liquids from the incoming natural gas stream by reducing the temperature and pressure low enough, so that partial liquefaction occurs. The liquids are then separated from the gas stream and further split into an ethane/propane product and a light gasoline/condensate product and removed from the facility by pipeline. The remaining natural gas is also removed by pipeline. The facility handles several regulated flammable chemicals above the RMP threshold quantity that include ethane, isopentane, butane, isobutane, propane, pentane, and methane. Kinder Morgan acquired the facility in 2002. There are eight full-time employees at this Union represented 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 Kinder Morgan personnel, to observe the facility process equipment, piping, and vessels. I observed that the facility was missing proper markings on piping (Photo No. 1 & 2, 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.

I also observed no spills, leaks, or fugitive hydrocarbon emission trails with the Forward Looking Infrared (FLIR™) Series GF320 optical gas imaging camera. Additional observations and findings are found on the RMP Program Level 3 Checklist, located in **Appendix #1**.

Section III – AREAS OF CONCERN

Close-out Meeting – EPA convened a closing meeting on Thursday, March 2, 2023, to discuss the Area of Concern (AOC) noted during the inspection and 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.

Kinder Morgan failed to properly label piping for process equipment associated with the depropanizer reflux drum (V8-601) and piping segments leading to an associated terminal at the facility, as required by American National Standards Institute (ANSI)/American Society of Mechanical Engineers (ASME) Standard A13.1.

Section IV – FOLLOW UP

No follow up occurred or was necessary after the inspection.

Section V – LIST OF APPENDICES

Appendix #1 – RMP Program 3 Checklist

Inspection Symbol Key: Y - Yes, N - No, N/A - Not Applicable; S - Satisfactory, M - Marginal,
U – Unsatisfactory.

Appendix #2 – Photo Log