EPA United States Environmental Protection Agency

Region 6 Compliance Assurance and Enforcement Division

INSPECTION REPORT

Inspection Date(s):	06/27/2019		
Media:	Air		
Regulatory Program(s)	RMP		
Company Name:	Enterprise Products Partners, L.P.		
Facility Name:	Enterprise Products – Hatcherville Road Complex		
Facility Physical Location:	12901 Hatcherville Road		
(city, state, zip code)	Baytown, Texas 77521		
Mailing address:	P.O. Box 4324		
(city, state, zip code)	Houston, Texas		
County/Parish:	Chambers		
Facility Contact:	Kent Mitchell	Senior Regional PSM Specialist	
	kmitchell@eprod.com		
FRS Number:	1000 00023 4702		
Identification/Permit Number:			
Media Number:			
NAICS:	32511		
SIC:			
Personnel participating in inspection:			
Kent Mitchell	Enterprise Products	PSM Specialist	832-501-4894
Douglas D'Aquila	Enterprise Products	Staff Engineer/PSM/RMP	{phone no.}
Mark Taylor	Enterprise Products	Operations Supervisor	832-501-4030
William Yancey	Enterprise Products	PSM Specialist	832-501-4908
Mike McNallen	Enterprise Products	Senior Safety Specialist	832-501-4152
David Brock	Enterprise Products	PDH Regional Manager Operations	832-501-4872
EPA Lead Inspector Signature/Date	Sherronda Phelps	8/13/2019 Date	
Supervisor Signature/Date	Samuel Tates	8/13/2019 Date	

6ENFORM-019-R7 (2/15/2017)

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

I, the Environmental Protection Agency (EPA) Region 6 inspector, Sherronda Phelps, arrived at the Enterprise Products-Hatcherville Road Complex (Enterprise) on June 27, 2019 for an announced inspection. I met with Kent Mitchell, PSM Specialist and other Enterprise personnel during the Opening Conference. I presented my credentials to Mr. Mitchell and informed him that this was an EPA inspection to determine compliance with the Clean Air Act (CAA) Section 112(r)(1) and 112(r)(7). The scope of the inspection was a partial compliance evaluation (PCE) and includes evaluation of the compliance of the facility with 40 CFR Subpart 68 – Chemical Accident Prevention Provisions. An employee representative was invited to participate in the inspection.

FACILITY DESCRIPTION

The Hatcherville Road Complex is located at 12910 Hatcherville Road, Baytown, Texas in Chambers County. The Hatcherville Complex operates a Propane Dehydrogenation Unit receives liquid propane feed stock which is then vaporized and sent to reactors where it is partially converted to propylene and hydrogen along with additional by-products. The Fractionator Unit is a treating and fractionation facility that pre-treats, dehydrates and uses liquid fractionation equipment to upgrade the mixed natural gas liquids to ethane, propane, mixed butanes and natural gasoline products. All feedstock and product are transported via pipeline. There are several listed flammable regulated substances utilized at the Hatcherville Complex.

Section II - OBSERVATIONS

40 C.F.R. Part 68 – Chemical Accident Prevention Provisions
Subpart A-General

40 C.F.R. § 68.10 Applicability – The Enterprise facility submitted a single Risk Management Plan (RMP) with covered processes that are subject to Program 3 requirements. Their last submission was a Re-submission completed May 11, 2018. As a facility with Program 3 processes, Enterprise must develop and implement a management system, conduct a hazard assessment, implement the prevention requirements of 68.65 through 68.87, develop and implement an emergency response program, and submit the data elements from 68.175 in their RMP.

§ **68.12 General Requirements**

Enterprise submitted a single RMP with covered processes that are subject to Program 3 requirements. Their most recent submission was completed on May 11, 2018. As a facility with Program 3 processes, Enterprise must develop and implement a management system, conduct a hazard assessment, implement the prevention requirements of 40 C.F.R. §§ 68.65 through 68.87, develop and implement an emergency response program, and submit the data elements from 40 C.F.R. § 68.175 in their RMP.

§ 68.15 Management System

Enterprise has developed a management system that oversees the implementation of the RMP elements and has assigned a qualified person or position to oversee the RMP. I observed this by the organization chart that distinguished and identified the organizational structure and the positions assigned to RMP elements and their responsibilities. I reviewed Enterprise's document titled, "RMP Management Responsibility Chart" which details all responsible parties.

Subpart B – Hazard Assessment

§ 68.20 Applicability

Enterprise operates a program level 3 process which is subject to this subpart and thus is required to prepare a worst-case release scenario analysis and complete the five-year accident history. I reviewed the documentation provided to make this analysis and identified no area of concern with information pertaining to sections 40 C.F.R. §§ 68.22 – 68.33 or any Offsite Consequence Analysis (OCA) data. The facility used the EPA Model RMP*Comp™.

§ 68.36 Review and Update

Enterprise indicated their plan to review their OCA at least once every five years as required.

§ 68.39 Documentation

Enterprise maintains documentation describing the vessel selected for review as a worst-case scenario and the assumptions and parameters used. A description of the scenarios identified, assumptions and parameters used, and the rationale for the selection of specific scenarios was documented as well.

§ 68.42 Five Year Accident History

Enterprise is reporting in their RMP accident history all incidents that have caused injuries.

Subpart D – Program 3 Prevention Program

§ 68.65 Process Safety Information

Enterprise provided documentation of process safety information including information pertaining to the hazards of substances in the processes, pertaining to the technology of the process, and pertaining to the equipment in the process.

§ 68.67 Process Hazard Analysis

Enterprise began their Process Hazard Analysis (PHA) on February 28, 2019. This is still a work in progress.

§ **68.69 Operating Procedures**

I reviewed several operating procedures while on site. David Brock, Unit Supervisor, shared information on the operating procedures and the personnel access provided. Enterprise provided examples for each phase of operation identified in the rule. Enterprise has a procedure in place for the maintaining and handling of operating procedures. Enterprise provided certification of operating procedures for the year 2018 and the 2019 certification is expected to be complete by end of year. Considering this unit was commissioned back in December in 2017 there was only one year of annual certifications provided.

§ **68.71 Training**

I reviewed training records for several individuals shared information on the operator training required on site. Operator qualification includes the following phases: process overview training, process and job specific training and operator initial qualification. Operator training is a combination of classroom and on-the-job training. Operator Training will be provided and reviewed at a later to date. See Follow Up.

§ **68.73 Mechanical Integrity**

I requested Mechanical integrity records for any past due or overdue inspections of RM P-covered equipment and the written procedure for maintaining the integrity of the process. A query was running for both fixed and rotating equipment and there were no past due inspections that populated with the search. Knowing the PDH unit start-up was in 2017, several of the frequencies/inspection intervals have not met the mark to be inspected. However, the facility conducts their visual checks and they have also begun some inspections of their fixed equipment as of 2019.

§ **68.75 Management of Change (MOC)**

Enterprise has established and implemented a procedure to manage changes to process chemicals, technology, equipment, and procedures. I reviewed several MOC's to for a completion check, there were no findings made from this review.

§ **68.77 Pre-Startup Review (PSSR)**

Enterprise has established and implemented a procedure to perform a pre- startup safety review for new stationary sources and modifications of stationary sources on site when the change is significant enough to require a change in process safety information. Documentation was provided to show how this procedure is being implemented at this facility.

§ **68.79 Compliance Audits**

A compliance audit is scheduled for later this year.

§ 68.81 Incident Investigation

Enterprise investigates all incidents promptly and assigned personnel to the recommendations and findings. I reviewed several incidents while on site to ensure their incident investigation procedures were being implemented as written.

§ 68.83 Employee Participation

Enterprise has developed a written plan of action regarding the implementation of employee participation and are meeting the requirements.

§ 68.85 Hot Work Permit

Enterprise discussed the process for conducting hot work onsite and several hot work permits were reviewed. Hot work permits reviewed looked satisfactory.

§ 68.87 Contractors

Enterprise uses MSA, a nested contractor, to conduct in house maintenance. Enterprise uses ISNET World for its contractor selection and assures that all contractors that may work on site have been trained on the potential hazards related to both the process equipment and work that the contractor may perform.

Subpart E – Emergency Response

§ 68.90 Applicability

Enterprise is a stationary source with program 3 processes subject to this subpart and is thus required to comply with the requirements of 40 C.F.R. § 68.95. Enterprise has an emergency response team that will respond to incidents on site.

§ 68.95 Emergency Response Program

Enterprise employs individuals who are first responders to accidental releases. I was provided with the document titled "Emergency Response Plan 2019" as the facility's Emergency Response Plan (ERP). The ERP includes procedures for informing the public and local emergency response agencies about accidental releases. A hard copy is maintained while the electronic version is available via the sites intranet. I randomly selected members of the Emergency Response Team to review their training records. From the documentation provided all training is current. Inspections and maintenance of emergency response equipment are handled by a 3rd party vendor.

Subpart G – Risk Management Plan

§ **68.150 Submission**

Enterprise has submitted a single RMP which includes the information required in 40 C.F.R. §68.150.

Section III – AREAS OF CONCERN

There were no findings made.

Section IV – FOLLOW UP

No information was received by EPA after exiting the Facility on June 27, 2019.