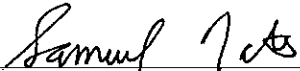


**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	03/26/2019 – 03/28/2019		
Media:	Air		
Regulatory Program(s)	Clean Air Act Section 112(r) and 40 C.F.R. Part 68 Chemical Accident Prevention Provisions		
Company Name:	Harvest Midstream (Formerly Harvest Pipeline Company LLC)		
Facility Name:	San Juan Basin Gas Plant		
Facility Physical Location:	1001 Arizona Street		
(city, state, zip code)	Bloomfield, New Mexico 87413		
Mailing address:	(same as above)		
(city, state, zip code)	(same as above)		
County/Parish:	San Juan		
Facility Contact:	Kevin Reese	Plant Manager	
	kreese@harvestmidstream.com		
FRS Number:	110007030275		
Identification/Permit Number:	Title V Operating Permit P124-R3		
Media Number:	RMP EPA Facility Identifier: 1000 0002 4181		
NAICS:	211112 = Natural Gas Liquid Extraction		
Personnel participating in inspection:			
Tony Robledo	US EPA/6EN-AS	Inspector	(214) 665-8182
Kevin Reese	Harvest Midstream	Plant Manager	(505) 632--4907
EPA Lead Inspector Signature/Date	 Tony Robledo		4/23/19 Date
Supervisor Signature/Date	 Samuel Tate		4/23/2019 Date

Section I - INTRODUCTION

PURPOSE OF THE INSPECTION

I, United States Environmental Protection Agency (EPA) Region 6 inspector Tony Robledo, arrived at the Harvest Midstream (Harvest), San Juan Basin Gas Plant, at approximately 9:00 a.m. on March 26, 2019, for an announced inspection. I conducted an opening meeting with the following persons in attendance as identified in Table 1.

Table 1: Opening/Close-Out Meeting Attendance

Name	Position
Kevin Reese *	Plant Manager
Russ Medhora *	L48 Lead Process Safety Engineer
Paul Harris *	Operations Engineer
Nicole Hopkins *	Process Safety Management Coordinator
Gary Cottoms*	Measurement/ Instrumentation and Electrical Technician
Julian Peirce	Plant Inspector (attended only the Mechanical Integrity meeting)
Tony Robledo *	EPA Inspector

*attended close-out meeting on March 28, 2019

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 evaluation of the compliance with 40 C.F.R. Part 68 – Chemical Accident Prevention Provisions.

FACILITY DESCRIPTION

The San Juan Basin Gas Plant is a natural gas processing plant that recovers hydrocarbon liquids from unprocessed natural gas. Two natural gas inlet streams (low pressure system and high pressure system) are delivered via pipeline to the plant. The recovered hydrocarbon liquids are transported via pipeline to fractionation plants for further processing and eventual sales. After processing, the residue gas from which the hydrocarbon liquids are recovered then delivered to a gas pipeline for eventual sales. The San Juan Basin Gas Plant operation includes inlet gas separation, dehydration, cryogenic gas processing (recovery of natural gas liquids), product surge capacity, and compression. There are no listed toxic substances, only flammable substances, which exceed their respective threshold quantities stored at this facility. The facility produces approximately 370 million standard cubic feet per day (MMscf/day) of natural gas. The facility has 18 full-time employees.

Section II – OBSERVATIONS

I conducted a walk-through of the facility on March 27, 2019, accompanied by Harvest 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 – Harvest 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 as such is subject to these Chemical Accident Prevention Provisions. Harvest listed the NAICS code (211112) natural gas liquid extraction, as the process in its Risk Management Plan (RMP). The Harvest 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 Harvest facility a Program 3 subject to 40 C.F.R. § 68.10(d).

40 C.F.R. § 68.12 General Requirements – Harvest re-submitted a RMP five-year update on June 9, 2014. 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 – Harvest 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. Harvest facility personnel provided an organization chart which documents the persons responsible for implementing individual requirements of the RMP as required by this subpart.

Subpart B – Hazard Assessment

40 C.F.R. § 68.20 Applicability – Harvest 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 as provided 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 consequence analysis. I reviewed the documentation provided and had a discussion with appropriate Harvest facility personnel. Harvest applied the offsite consequence analysis parameters as required by this subpart.

40 C.F.R. § 68.25 Worst-Case Release Scenario Analysis – Harvest 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 Harvest facility personnel. Harvest selected an Ethane-Propane-Butane-Condensate (EPBC) V-902 vessel for the worst-case release scenario. Harvest used EPA's RMP*Comp to determine the distance to the endpoint in the worst-case release scenario. Harvest used the proper endpoints for flammables as required by this subpart.

40 C.F.R. § 68.28 Alternative Release Scenario Analysis – Harvest 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 Harvest facility personnel. Harvest selected a seal failure at an EPBC pipeline pump for the

alternative release scenario. Harvest used EPA's RMP*Comp to calculate the distance to the endpoint in the flammables alternative release scenario. Harvest 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. Harvest 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 identified public receptors.

40 C.F.R. § 68.36 Review and Update – Harvest reviewed and updated its RMP on November 27, 2017, to reflect the ownership transfer from ConocoPhillips (CP) that occurred in August 2017. This RMP submittal identified process chemicals and flammable mixtures of methane, propane, butane, pentane, isobutane, and isopentane. Harvest 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 scenario 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. Harvest's documentation of the alternative release scenario 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 – Harvest 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 – Harvest indicated that process safety information is managed using an electronic system. I reviewed various examples of process safety information for the facility. 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 (PHA) – I reviewed Harvest's PHA process and procedures. Harvest used the Layer of Protection Analysis (LOPA) technique to conduct its PHA's. I reviewed Harvest's most recent PHA conducted on January 28, 2016. This PHA was conducted at the time of CP ownership and identified 44 action items which were closed. Harvest provided documentation that these action items were completed.

40 C.F.R. § 68.69 Operating Procedures – Harvest used an electronic document management system to maintain its operating procedures. I reviewed and discussed with Harvest personnel randomly selected operating procedures and lockout/tagout procedures. Harvest provided a list of 22 operating procedures. Harvest provided documentation that it had completed annual certification of 22 operating

procedures in 2018. Harvest was unable to provide documentation that it had completed annual certification of 22 operating procedures in 2017.

40 C.F.R. § 68.71 Training – I discussed with Harvest 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. I received and reviewed these three training records. The training records and 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. Harvest indicated that the mechanical integrity of its process equipment is managed using an electronic system called Plant Condition Management Software (PCMS). I discussed mechanical integrity with Harvest personnel. Harvest provided information on three (EPBC) V-902 vessels which included the frequency of the inspections and testing documents performed on these vessels to include the date of the inspection or test, the name of the person who performed the inspection or test, the identification number of the 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. I did observe that Harvest was past due on internal inspections for two tanks (TK-1402 and TK-1403) which were scheduled for inspection in October 2018 and are now schedule for inspection in July and August 2019. Harvest claimed that these low risk atmospheric tanks were overlooked during an acquisition of new assets.

40 C.F.R. § 68.75 Management of Change (MOC) – I reviewed Harvest's written procedure for MOC and discussed the MOC process with Harvest personnel. I reviewed the following MOC's provided by Harvest personnel: MOC SJ-1-2017-0506, MOC SJ-1-2017-0505, MOC HAR 2018-05-09-5854, and HAR 2018-09-18-12129.

40 C.F.R. § 68.77 Pre-startup Review – I reviewed Harvest'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 – Harvest provided its most recent compliance audit which was conducted on June 5, 2018. A previous compliance audit was conducted by CP on September 30, 2015. I observed the recommendations for these compliance audits and noted 63 total action items of which 61 were completed and two pending completion. On April 17, 2019, Harvest reported that all compliance audit actions items were completed. The compliance audits evaluated compliance with the provisions of this subpart and were conducted by at least one person knowledgeable in the process. An action plan of the findings of the audits was developed. The audit action plan consisted of actual completion dates to identify that recommendations had been completed.

40 C.F.R. § 68.81 Incident Investigation – I reviewed Harvest's completed OSHA form 300 of worker related injuries and illness for the past two years and determined that none of the injuries reported were the result of an accidental release. Harvest reported one incident that occurred on December 27, 2017, due to a sample cylinder leak during a heater/oven replacement. Harvest reported no deaths, injuries, or evacuations regarding this incident.

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 subpart. I discussed this document and employee participation with Harvest personnel. I also interviewed one full-time operator.

40 C.F.R. § 68.85 Hot Work Permit – I discussed hot work permits with Harvest personnel. Harvest had no hot work permits to review, as none were required within the past 30 days, and Harvest has a policy to shred hot work permits after 30 days.

40 C.F.R. § 68.87 Contractors – I discussed with Harvest personnel the contractor selection process. This discussion included considering the contractor's safety performance, safety programs, training, and qualifications. Harvest personnel stated that they and HilCorp use ISNetWorld, but that not every Harvest facility is located in their system. Harvest personnel noted that they are in the process of including gas plants from various acquisitions including the San Juan Basin Gas Plant into ISNetworld to further assist in its contractor evaluation process, and that contractors it selects must have a high rating. Harvest documents that contractors have site-specific safety training and conducts a post-evaluation once contractor work is completed.

Subpart E – Emergency Response

40 C.F.R. § 68.90 Applicability – Harvest 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 Harvest personnel their emergency response plan. Harvest personnel stated its facility was included in the community emergency response plan, that it had coordinated response actions with the local fire department, and that it had inspected all its onsite fire extinguishers. I reviewed the most recent monthly and annual Harvest fire extinguishers inspection documents.

Subpart G—Risk Management Plan

40 C.F.R. § 68.190 Updates – Harvest updated its most recent RMP on November 27, 2017, due to the transfer of ownership from CP. Harvest used the CP RMP five-year update conducted on June 9, 2014 to establish the date for its next five-year RMP update. A new five-year update will be due on or before June 9, 2019, 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 – Harvest 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 one month.

Close Out Meeting – A close-out meeting was held on March 28, 2019, at 9:00 a.m. to discuss areas of concern, due dates for requested information, recommendations, and the timing of the completion of the inspection report. The persons who attended this meeting are identified in Table 1.

The areas of concern in the following section were discussed during the close out meeting which included compliance assistance and the potential enforcement process.

Section III – AREAS OF CONCERN

1. 40 C.F.R. § 68.69(c) Operating procedures

(c) The operating procedures shall be reviewed as often as necessary to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to stationary sources. The owner or operator shall certify annually that these operating procedures are current and accurate.

Harvest failed to certify its operating procedures for 2017.

2. 40 C.F.R. § 68.73(d)(1) Mechanical integrity

“(d) Inspection and testing. (1) Inspections and tests shall be performed on process equipment.”

Harvest failed to conduct inspection and testing on two atmospheric tanks (TK-1402 and TK-1403).

Section IV – FOLLOW UP

Harvest agreed and did provide additional documentation and information by April 9, 2019.

Section V – LIST OF APPENDICES

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

Meeting with HARVEST PIPELINE SAN JUAN BASIN GAS PLANT
 Purpose of meeting: EM/RMP INSPECTION

Date: 3/26/19

	Name	Title	Representing	e-Mail	Phone
1	Tony Robledo	Inspector	U.S. EPA	robledo.tony@epa.gov	214-665-8182
2	Russ Medhough	L-48 LEAD PROCESS SAFETY	Harvest Midstream	rmedhough@harvestmidstream.com	346-237-2063
3	PAUL HARRIS	OPERATIONS ENGINEER	HARVEST MIDSTREAM	PHARRIS@HARVESTMIDSTREAM.COM	505-632-4937
4	Nicole Hooker	PSM Coordinator	Harvest Midstream	Shookin@harvestmidstream.com	505-947-3895
5	Gary Cotton	Measurement / I/E Tech	Harvest Midstream	GCotton@harvestmidstream.com	505-632-4920
6	Kevin Reese	Plant Manager	Harvest Midstream	Kreese@harvestmidstream.com	505-632-4907
7	JULIAN PEIRCE	Plant Inspector	Harvest midstream	jpeirce@harvestmidstream.com	505-419-2492
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10	✓	Attended	CLOSE-OUT MEETING ON	3/28/19	
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