

U.S. EPA REGION 6

ENFORCEMENT & COMPLIANCE ASSURANCE DIVISION

INSPECTION REPORT

Stationary Source	ONEOK (Magellan Midstream, L.P.), Corpus Christi, Texas	
Facility Location	15 N Country Club Pl, Corpus Christi, TX 78407	
Media	Clean Air Act (CAA) – Section 112(r)(1), General Duty Clause CAA – Section 112(r)(7), Risk Management Program (RMP)-40 CFR Part 68	
FRS Number	110070531302	
USEPA RMP Facility ID	100000234007	
Latitude / Longitude	27.809323, -97.436187	
Dates of Inspection	February 12–15, 2024	
USEPA Contact	Diana Lundelius, U.S. EPA Region 6 Chemical Accident Enforcement Section	
Description of Activities	Inspection included the following activities: • Opening conference with facility representatives • On-site document review • Field verification • Personnel interviews • Closing meeting with facility representatives	
Inspection Participants	U.S. EPA - Gloria Odusote, EPA Headquarters Eastern Research Group, Inc. (ERG) - Amy Federoff, Sarah Biscardi, Parker Hendrick	
Facility Participants	Danny Scroggins, Senior Attorney	
	Brian Hoppe, Manager, Process Engineering	
	Kelli Riddle, Senior PSM Engineer	
	Raleigh Myers, Director Operations	
	Marshal Sinor, Manager Operations	
	Ronny Keisek, Area Supervisor	
	Luis Renteria, Area Supervisor	
	Crystal McGrew, Compliance Coordinator	
	Jesse Cotton, Logistics Supervisor	
	Sean Judkins, Area Supervisor- Maintenance	
	Zach Howard, Director, Facility Integrity	
	Jose Marcano, Process Engineer	
	Orlando Alaniz, Safety Specialist	
	Justin Frisby, Senior Operator	
	David Mungia, Senior Operator	
For EPA – ERG Lead Inspector Signature/Date		
	Amy Federoff, ERG	Date
EPA Section Chief Signature/Date		
	Samuel Tates	Date

FACILITY/PROCESS DESCRIPTION

The ONEOK (Magellan Midstream, L.P.) Corpus Christi Facility (the Facility or ONEOK) was originally built in the 1930s as a crude oil refinery, but was destroyed by a hurricane in 1970. The Facility chose not to rebuild the processing area, and rebuilt only the storage and transfer operations. In 2004, Magellan Midstream Partners L.P. acquired the Corpus Christi Facility and continued with storage and transfer operations until 2016, when they added a condensate oil Splitter Unit. In September 2023, ONEOK acquired Magellan Midstream Partners L.P. and the Corpus Christi Facility. Currently, the condensate splitter and bulk products storage area (i.e., the terminal) are owned and operated by separate business entities. The condensate splitter is maintained by Magellan Processing, L.P. and the terminal is maintained by Magellan Terminal, L.P. Assets owned and operated by both Magellan Processing, L.P. and Magellan Terminal, L.P. are wholly owned by ONEOK.

There is a single console room to operate both the splitter and the terminal; however, each unit is controlled by separate operators. The entire campus employs 67 full-time employees. Additional contract employees are on-site each day to provide maintenance and specialty services. The Facility operates 24 hours a day, 7 days a week and follows the Dupont shift schedule¹. Maintenance employees work Monday through Friday and are available during weekends and holidays as needed. There is no labor union at the Facility.

The condensate Splitter Unit at the Facility has a capacity to process 50,000 barrels per day (BPD) of crude condensate oil into various fuel products. The Facility receives condensate oil via pipeline or ship and stores raw feedstock in five condensate settling tanks. The condensate oil enters a Surge Drum to remove most of the remaining water and flows through multiple pre-heaters before entering a pre-fractionator column. The light-ends from the pre-fractionator pass through a depropanizer column to separate out propane, and then through a debutanizer column to separate butane and light naphtha. The pre-fractionator bottoms are heated and sent to the main fractionator column where they are separated into heavy naphtha, kerosene, diesel, and atmospheric tank bottoms (ATB). All vent lines and overpressure devices from the condensate unit equipment and vessels are routed to a single flare at the Facility.

The Facility stores propane and butane in six pressurized bullet tanks connected to truck unloading racks. Two vessels are used for dedicated propane storage, two for dedicated butane storage, and the remaining two change service between propane and butane based on the need for storage. The light naphtha, heavy naphtha, kerosene, diesel, and ATB are held in atmospheric storage tanks. Products from the atmospheric storage tanks are typically shipped for off-site transfer via pipeline to the loading/unloading dock. The Terminal Unit has a 5 million (5MM) barrel capacity with around 50 atmospheric storage tanks that hold a variety of hydrocarbon products received from pipeline or dock shipments. ONEOK does not own the product held in these tanks but provides transportation and storage services for external customers.

¹ All shifts on a DuPont schedule are twelve-hour shifts, so employees average 42 hours throughout the four-week cycle on a rotating schedule. Rotating schedules requires four teams, each following their own four-week schedule.

The Facility reported one RMP covered process in the most recent RMP submission dated November 2, 2021, shown in **Table 1** below. The limits which the Facility has defined for the covered process begin with the condensate oil feed pumps and end with the naphtha chillers. This battery limit boundary includes the furnace, pre-fractionation tower, depropanizer, debutanizer, pressurized storage bullets, main fractionator, flare, and all associated piping and vessels. The Facility also includes the six pressurized storage vessels for propane and butane as well as the piping and equipment involved for the truck unloading racks in the RMP-covered process. The atmospheric storage tanks in the condensate Splitter Unit (light naphtha, heavy naphtha, kerosene, diesel, and ATB) and atmospheric storage tanks in the Terminal Unit are not a part of the covered process.

Table 1

Process ID	Process Name	Program Level	Chemical	Category
1000120332	Condensate Splitter	3	Flammable Mixture	Flammable

PURPOSE OF THE INSPECTION

EPA selected the ONEOK Facility for inspection to further investigate the details of an accident that occurred at the Terminal Unit during the cleaning of sludge from a storage tank (Storage Tank 142) in December 2020 that resulted in six injured workers and one fatality. The EPA inspection team focused on the Facility's implementation of and compliance with the requirements under CAA § 112(r) Risk Management Plan and CAA § 112(r)(1) General Duty Clause both generally at the Facility and specifically in relation to the December 2020 incident.

The inspection of the ONEOK Facility occurred February 12, 2024, through February 15, 2024. While at the Facility, the EPA inspection team performed a field walking tour of equipment in the condensate Splitter Unit, conducted interviews with facility representatives, and requested documents for review regarding both the condensate Splitter Unit and the Terminal Unit. The field walking tour of the condensate Splitter Unit was limited because the Facility was actively preparing for a turnaround that would shut down the unit for 30 days, beginning on Thursday, February 15, 2024. Turnaround preparation included an increase in on-site staff, active work in the condensate unit, and staging of large equipment using heavy machinery. These conditions limited access for the EPA inspection team due to increased safety concerns.

In preparation for the inspection, Diana Lundelius of U.S. EPA Region 6 sent an electronic notice of inspection and request for information (RFI) to Facility personnel on January 22, 2024. The RFI included a list of documentation that the EPA inspection team intended to review upon their arrival at the Facility on February 12, 2024. The EPA correspondence to ONEOK also requested that ONEOK inform employee representatives of the inspection and invite them to participate as required by CAA § 112(r)(6)(L). The ONEOK Manager of Process Engineering confirmed the receipt of the notice of inspection on behalf of the ONEOK Corpus Christi Facility on January 24, 2024.

OPENING CONFERENCE

Lead Inspector Federoff initiated the opening conference at approximately 8:15 am on Monday, February 12, 2024, by introducing the members of the EPA inspection team and explaining the purpose

and scope of the inspection. Inspector Federoff presented the Notice of Inspection and Right to Claim Confidentiality forms to the Facility's Senior Attorney, who signed both in acknowledgement of the provided information (see Attachment 1). Inspector Federoff discussed the expected logistics for each inspection day, which included interviews with personnel, documentation requests, a driving tour of the entire Facility, and walking tours of the condensate splitter and Storage Tank 142 in the Terminal Unit. The opening meeting included ONEOK representatives who also participated throughout the inspection. The Sign-In Sheet (see Attachment 2) records all ONEOK representatives who were either present at the opening conference or who participated in interviews during the inspection.

INSPECTION OVERVIEW

ONEOK representatives provided a brief overview of the entire Facility and specific details about the operation of the condensate splitter. A safety presentation was provided to EPA inspectors prior to completing a driving tour through the Facility. The EPA inspection team used the driving tour to become familiar with the layout of the Facility and understand the boundary between the condensate splitter and Terminal Units. The EPA inspection team coordinated meetings with multiple facility personnel to discuss the implementation of and compliance with the requirements under CAA § 112(r) Risk Management Plan and CAA § 112(r)(1) General Duty Clause with respect to the operation and maintenance of the Facility. The EPA inspection team also completed a walking tour of a portion of the condensate splitter that was still accessible during turnaround preparation, and of Storage Tank 142 at the Terminal Unit.

While on site, the EPA inspection team requested additional documentation to support the Facility's implementation of the applicable requirements of CAA § 112(r) Risk Management Plan and CAA § 112(r)(1) General Duty Clause throughout the condensate Splitter Unit and Terminal Unit. The Inspection Document Request List (see Attachment 3) recorded each document identified for further review by the EPA inspection team. The EPA inspection team provided a copy of the document request list to ONEOK at the conclusion of the inspection. ONEOK personnel indicated they would provide documentation responsive to this follow-up request within 14 days.

FIELD OBSERVATIONS

On February 12, 2024, facility representatives provided a driving tour of the terminal and Splitter Unit to the EPA inspection team. The driving tour included the condensate splitter feed tanks, splitter flare, propane and butane storage vessels, a view of the perimeter of the Splitter Unit, and the area around Storage Tank 142. During this tour, the EPA inspection team took 19 photographs of the Facility.

On February 13, 2024, ONEOK representatives escorted the EPA inspection team to the crude pre-heater heat exchangers, surge drum, and water settling drum of the Splitter Unit to conduct observations and comparison evaluations of process and instrumentation diagrams (P&IDs). The EPA inspection team also walked around the area surrounding Storage Tank 142, the site of the December 2020 accident. During this walking tour, the EPA inspection team took 15 photographs of the Facility. The photograph log is provided in Attachment 4. The following observations made during the walking tours of the process units:

- Process piping throughout the Facility (Photographs 5, 26, 28, and 31) was not sufficiently labeled or color-coded to indicate the contents or direction of flow, per American Society of Mechanical Engineers (ASME) standard A13.1 (2023). As a result, this equipment does not conform with recognized and generally accepted good engineering practices (RAGAGEP), per 40 CFR § 68.65(d)(2).
- The EPA inspection team identified inconsistencies between the provided electrical classification drawing (File 475-D-8000-3_HAZ_Class_SITE_PLAN.pdf) and the location of equipment observed during the field inspection. Due to these observed inconsistencies, the Facility has failed to maintain accurate Process Safety Information (PSI) and has not ensured that its electrical classification is accurate and up to date in accordance with 40 CFR § 68.65(d)(1)(iii).
 - Storage Tank 168 was physically observed in the Terminal Unit at the Facility but was not shown on the electrical classification drawing;
 - Storage Tanks 138 and 139 were physically located in the diked area of the Terminal Unit at the Facility, but were located outside of the diked area on the electrical classification drawing;
 - Storage Tanks 138 and 139 were missing tank labels on the electrical classification drawing; and,
 - The area around the flare was not shown with any electrical classification.
- An aqua ammonia storage vessel was identified in the condensate Splitter Unit (Photograph 16) which is not part of the covered process.

DOCUMENTATION REVIEW

ONEOK representatives responded to EPA's pre-inspection RFI and provided the requested documentation by February 2, 2024. Additional facility documents were provided to the EPA inspection team in response to the Document Request List (Attachment 3) by March 5, 2024, via electronic transmittal. Additional information also was furnished June 14, 2024. The following report sections provide a summary of the review of documentation provided to EPA and the inspection team's on-site observations.

CLEAN AIR ACT SECTION 112(r)(1) – GENERAL DUTY CLAUSE

As previously discussed in the Purpose of Inspection section of this report, the inspection covers activities throughout the Terminal Unit under the General Duty Clause (GDC). The GDC states that: *"Owners and operators of stationary sources producing, processing, handling, or storing substances listed pursuant to Section 112(r)(3) of the CAA, 42 U.S.C. § 7412(r)(3), or any other extremely hazardous substance, have a general duty, in the same manner and to the same extent as under 29 U.S.C. § 654, to identify hazards that may result from accidental releases of such substances using appropriate hazard assessment techniques, to design and maintain a safe facility taking such steps as are necessary to prevent releases, and to minimize the consequences of accidental releases that do occur."*

Design of a Safe Facility

Facility representatives stated that process hazard analyses (PHAs) are performed on the terminal equipment and storage and transfer operations on a case-by-case basis, separate from the RMP covered process. A PHA for the terminal was not received or reviewed by the EPA inspection team.

Inspectors did receive the What-If hazard analysis that the Facility conducted immediately following the Storage Tank 142 incident in December 2020 (File 86. Tank 142 Incident Action Items). Eight action items were developed as part of the post incident What-If analysis, and at the time of the EPA inspection all actions items were resolved. Design at the Facility generally follows American Petroleum Institute (API) standard 2510 requirements, and includes corporate guidance across both the Splitter Unit and Terminal Unit. All employees can access process information such as safety data sheets, chemical inventories, and process drawings on the company's intranet site.

Maintaining a Safe Facility

Facility representatives stated that they generally follow requirements of API standard 653 for aboveground storage tank maintenance and inspection practices on site. Management of change requests (MOCs) and Pre-startup Safety Reviews (PSSRs) may be requested and performed for terminal processes or equipment, and these are tracked similarly to MOCs and PSSRs applicable to the covered process. See sections "40 CFR § 68.75 – Management of Change (MOC)" and "40 CFR § 68.77 – Pre-Startup Safety Review (PSSR)" of this report for further details on the facility's MOC and PSSR processes.

Facility representatives stated that they have established operating procedures specifically for the Terminal unit. Other procedures such as lock out/tag out and confined space entry are the same for the entire Facility. All employees at the Facility are required to complete health and safety training when they start, and new employees then have training specific to the area where they will be working.

The December 2020 incident at Storage Tank 142 did not occur within the RMP covered process, but was assessed by the EPA with regard to GDC requirements for incident investigation. This incident was caused by the use of a non-conductive hose to vacuum transfer residual material containing condensate to a vacuum box. The incident resulted in the death of one contractor employee and injuries to six others. An incident report was developed immediately after the incident (File 79. 2020 IDR vac box fire). The Incident Investigation Report dated June 12, 2023, provides a detailed timeline of the incident, subsequent reporting and investigation, a thorough description of the incident, an assessment of contributing factors, identification of a root cause, and recommendations resulting from the investigation (Exponent's Report, *In the Matter of Ramirez et al. vs Magellan Midstream Partners, L.P. et al*). The EPA inspection team discussed the incident with the Director of Facility Integrity, who provided a detailed overview of the investigation approach and the mitigation actions implemented post-incident, such as updates to the tank cleaning standard operating procedure (SOP), changes to the contractor review process, requirements for contractor project plans to include a grounding and bonding plan, and, improved oversight of contractor work. The Facility provided documentation of the status of action items for this incident at the time of the inspection. A total of eight action items were developed in response to the incident investigation effort, and all are noted as completed (File 86. Tank 142 Incident Action Items).

Minimizing the Effects of a Release

ONEOK employs a contractor to respond to emergencies on site, in addition to relying on assistance from local emergency responders. A sitewide emergency plan describes coordination and notification actions for multiple emergency scenarios, including spills, fires, explosion, hydrogen sulfide releases, medical emergencies, extreme weather, and security threats, throughout all areas of the Facility. See section “40 CFR § 68.95 – Emergency Response” of this report for more details on emergency response activities.

40 CFR. PART 68 – CHEMICAL ACCIDENT PREVENTION PROVISIONS

40 CFR § 68.10 – Applicability

The ONEOK Facility defines the boundaries of the RMP covered process at specific points in the condensate splitter process. According to Facility personnel, the boundary limits of the RMP covered process begin at the condensate oil feed pumps that move the oil through the Feed Surge Drum (VC-2001) and pre-heaters before downstream separation in the pre-fractionator column. According to Facility personnel, the Facility does not consider the condensate oil storage tanks that provide the raw material for the condensate splitter process as part of the RMP covered process. However, the condensate oil storage tanks are interconnected to the condensate splitter process through piping. The EPA inspection team did not receive documentation that further explains why the condensate oil storage area is not included in the RMP covered process.

The Facility has also set boundary limits for the RMP covered process to exclude any piping, stripper vessels, and storage tanks for heavy naphtha, kerosene, diesel, and ATB that is present in the process downstream of the main fractionator column. The safety data sheets (SDSs) for these chemicals list an NFPA flammability hazard rating of 3 or less for these materials. As such, the Facility has determined that these substances would not be considered a regulated substance for the purpose of considering them to be part of an RMP covered process. However, the vessels and storage tanks located downstream of the main fractionator could potentially be considered a part of the Facility’s RMP covered process, as these vessels are all interconnected and may meet the definition of a single “process” pursuant to 40 CFR § 68.3.

The RMP covered process boundary extends downstream of the light naphtha area after the main fractionator and includes the Jet Side Stripper (VSR-2004) and Naphtha Chiller (AC-3003). All piping and vessels located downstream of this equipment are not considered part of the RMP covered process. However, the SDS for light naphtha (File It naphtha) lists an NFPA flammability hazard rating of 4 for this material. According to the threshold determination requirements defined under 40 CFR § 68.115(b)(2)(i), the light naphtha contained in the piping and storage vessels should be included in the Facility’s RMP covered process.

The EPA inspection team also reviewed chemical inventory at the Facility to determine the potential presence of any other RMP regulated substances. During the inspection, an aqueous ammonia storage vessel was identified in the condensate Splitter Unit (Photograph 16). ONEOK reported that the storage vessel (VT-2007) has a maximum capacity of 1,762 gallons of 19% aqueous ammonia (File 60. VT-2007). The material in VT-2007 at ONEOK does not meet the 20% concentration criteria for aqueous ammonia as an RMP regulated substance, pursuant to 40 CFR § 68.130.

The EPA inspection team has identified potential areas of concern (AOCs) at the end of this inspection report for this RMP program element.

40 CFR § 68.15 – Management Systems

ONEOK adopted Magellan Midstream’s Process Safety Management Program upon acquisition of the Facility, which documents the system used to support the implementation of the RMP elements. ONEOK has assigned the Manager of Safety and Compliance on a corporate scale and the Supervisor of Operations at the site as the qualified persons with overall responsibility for the development, implementation, and integration of all RMP elements. An organizational chart defines the lines of authority and personnel responsible for individual RMP elements (Files 2024 PSM_RMP Responsibility Organization Chart (1) and 7.13-ADM-311 – Process Safety Management Risk Management Plan Program).

40 CFR § 68.22 - § 68.39 – Off Site Consequence Analysis (OCA)

The Facility used EPA’s RMP*Comp program to model the worst-case scenario (WCS) and alternative release scenario (ARS) for flammables from the covered process (File 6 2021 splitter RMP explanation of cases.docx). The Facility modeled the WCS using a release of 100% of one propane bullet tank, resulting in a vapor cloud explosion. The ARS is a vapor cloud explosion caused by a gasket failure at the propane loading pump. EPA requested ONEOK provide supporting documentation regarding the methodology used to define off-site impacts to both potentially affected populations and environmental receptors. In response, ONEOK provided documentation of the rationale for scenario selection, definition of WCS and ARS distance-to-endpoints, and population densities based on 2010 Census data (File 62021 splitter RMP explanation of cases). Since the 2020 Census data was publicly released September 16, 2021, the OCA WCS and ARS completed October 21, 2021, should have been updated using the 2020 Census population data for the November 2, 2021, RMP registration five-year update.

The EPA inspection team has identified an AOC at the end of this inspection report for this program element.

40 CFR § 68.42 – Five Year Accident History

In 2019, Magellan Midstream provided an update to the five-year accident history in their RMP submission to document two flare release incidents that occurred on September 29, 2017, and November 16, 2018. Both of these accidents occurred at the Splitter Unit and resulted in fires and release of hydrocarbons. These accidents did not result in personnel or contractor injuries or deaths but resulted in minimal third-party property damage. No off-site receptors were reportedly impacted by either accident [Files 09292017 Release MTH-Corpus Christi (Splitter) II 101817, Incident Investigation #0816-Corpus Flare Upset 09032017 2018-11-16 CC Upset II, and MEMO Splitter 11-16 Upset 20190125].

ONEOK provided notification of two incidents that occurred within the covered process within the last five years:

- A hydrogen sulfide release on January 11, 2020; and,
- A butane release on May 20, 2023.

The January 2020 accident resulted in a release of an unknown quantity of hydrogen sulfide vapors from a vacuum compressor within the Splitter Unit area. The compressor continued to operate for approximately four hours before shutting down to stop the leak. The accident report does not disclose the release reporting timeline. No injuries or property damage were reported, and no off-site receptors were reportedly impacted by the accident (File 85. CCCS H₂S Leak Incident Report rev 3). Further information regarding the accident is included in the Incident Investigation section of this report. Though this accident occurred at the covered process, it did not involve a regulated substance held above the threshold quantity and the reported consequences are minimal. Therefore, the incident did not meet the RMP reportable accident criteria. As such, there are no reporting requirements for this incident in the RMP five-year accident history.

The May 2023 incident resulted from a butane loading hose failure, releasing an estimated 7.3 gallons of butane to the atmosphere, and injuring one third-party employee. The incident report does not disclose the reporting timeline. No off-site receptors were reportedly impacted by the incident (File 85. II Truck Loading Rack Butane Release). Further information regarding the accident is included in the *40 CFR § 68.81 – Incident Investigation* section of this report. As this incident occurred at the covered process with a regulated substance and resulted in an injury, the Facility is required to report this incident in the five-year accident history.

The EPA inspection team has identified AOCs at the end of this inspection report for this program element.

40 CFR § 68.65 – Process Safety Information (PSI)

ONEOK maintains process safety information for the entire Facility on their intranet site which is accessible by all employees. The PSI contains process flow diagrams for the condensate splitter, safety data sheets for all chemicals at the Facility, a description of the process chemistry, maximum intended inventory, and consequence of deviation tables showing safe operating limits. The Facility also maintains a list of P&IDs for all equipment, a list of safety systems that are in place throughout the Facility, and the equipment with which each safety system is associated. The Facility generally refers to API standard 2510 and corporate design standards to ensure that equipment is constructed of appropriate materials. The Facility maintains a pressure relief standard specific to the condensate Splitter Unit. This standard is based on a combination of ASME VII (heating boilers), API 520 (pressure relief devices), API 521 (pressure relieving and depressuring systems), and API 2000 (normal and emergency vapor venting). The newest version of the ONEOK standard is dated December 2017 (File MMP-CCCS-STD-001 - Relief Valve Standard), and defines selection criteria, sizing, and installation of pressure relief devices. Comparing the ASME manufacturer's data reports for pressure vessels (U1A forms) to the range of relief pressures for the bullet tanks shows that the relief pressures are set to the maximum tank pressure of 300 pounds per square inch (psi) for each of the six propane/butane bullet storage tanks, and that each tank is equipped with eight (8) relief valves.

During the driving tour of the Facility conducted on February 12, 2024, the Facility ensured that the EPA inspection team had an adequate understanding of the Facility layout. During this tour the team was given an electrical hazardous classification plan (File 475-D-8000-3_HAZ_CLASS_SITE_PLAN) to reference equipment. At the time of the inspection, this document had not been fully updated to show recent changes to the Facility layout as well as changes to the electrical hazard classifications. The EPA inspection team was informed that the document was with the drawings team and was being updated at the time of the inspection. An updated version of the electrical hazard classification plan was provided after the conclusion of the on-site inspection (File 106. EAC site). Additionally, during the inspection, P&IDs for condensate splitter around the Feed Surge Drum, VC-2001, and the associated feed equipment, such as heat exchanger E-3866, were requested to ensure accuracy through field observation verification. The field observations showed no discrepancies between the P&IDs and the actual equipment present.

40 CFR § 68.67 – Process Hazard Analysis (PHA)

The Facility conducted initial PHAs prior to initial startup of the processing units and are revalidated within five years according to the ONEOK PHA procedure dated January 1, 2024 [File 11.01-ADM-001 Process Hazard Analysis (PHA)]. The PHA procedure includes options for conducting PHAs using either What-If, Checklist, or Hazard and Operability (HAZOP) methodologies and includes guidance for related roles and responsibilities of the project manager, the PHA team, and the PHA facilitator. The Facility defines PHA scopes for the covered process as either inside of battery limit (ISBL) or outside of battery limit (OSBL). Additionally, the Facility performs one-time hazard analysis exercises for projects, MOCs, and other activities that are anticipated to impact the Facility or personnel. For example, the Facility conducted a PHA for all turnaround projects scheduled for February 2024 (Files Document 80 and 2023 TA Project HAZOP Study Worksheet). At the time of the inspection, the Facility was still actively pursuing completion of PHA action items in preparation for the forthcoming turnaround.

Historically, ONEOK has engaged a third-party contractor to facilitate PHAs at the Facility, such as the PHA revalidation for ISBL in 2022 (Files 2022 MMP CC ISBL Condensate Splitter and Revalidation PHA Final Report – 03-17-2023). However, Facility representatives stated that they will facilitate PHAs in-house during the next revalidation cycle. ONEOK has three trained PHA facilitators via a third-party certification training program. Facility personnel indicated that participants in a given PHA include, at a minimum, one process engineer, one operator, and one project manager.

The EPA inspection team requested and received the most recent PHAs for ISBL and OSBL processes, as well as the status of the recommendations from these PHAs. The dates of the most recent PHAs are (File 10. PHAs): ISBL - December 2017 and November 2022; and, OSBL - June 2016 and May 2021. The number of recommendations from each PHA as well as their status at the time of the EPA's inspection in February 2024 are show in **Table 2** (File PHA action items CMS; and File 130. PHA action item status).

Table 2

Process Area	Total Number 2016/2017 PHA Recommendations	Unresolved 2016/2017 PHA Recommendations and Target Due Dates	Total Number 2021/2022 PHA Recommendations	Unresolved 2021/2022 PHA Recommendations and Target Due Dates
ISBL	76	None	19	11 – on or after December 1, 2024
OSBL	37	None	18	8 - May 11, 2026

In reviewing the completed action items from the 2017 revalidation of ISBL processes, at least 44 action items were documented as completed past the due date, ranging from one week to almost two years late. While approximately 10 of these action items were noted as having incorrect due dates assigned, there are other actions that were not completed in the assigned timeframe with no explanation (File 130. PHA action item status). Therefore, the Facility has not established a system to promptly address PHA team findings and recommendations, as required by the rule.

Table 2 shows the OSBL processes have eight recommendations from the May 2021 PHA with target dates of May 11, 2026, aligning with the five-year PHA revalidation cycle for this PHA. Open actions from the most recent PHAs range from evaluating safeguards to reduce risk to updating documentation (File Corpus Christi Terminal – OSBL PHA Revalidation – 5-11-2021). Facility representatives stated that the Facility assigns due dates to action items based on assigned priority and aims to close all PHA action items prior to the initiation of the next PHA revalidation. The Facility indicated that it will close action items sooner if possible, such as during planned or unplanned shutdowns or turnarounds.

In reviewing the content of the PHAs, inspectors did not identify risks related to severe weather, natural hazards, or increased risk due to climate change in their stationary source siting considerations, such as the Facility Siting Checklist or other documentation of PHA processes (File 11-FORM-0780 - Facility Siting and Human Factors Checklist). The Facility is located in a coastal area of Corpus Christi, Texas, which has an increased risk of high winds and flooding during intense storms and hurricanes that may be exacerbated by climate change. Facility representatives stated that the goal of hazard analysis efforts is to eliminate hazards, and that it is difficult to prevent risk from unknown conditions, such as weather. Currently, the Facility anticipates potential impacts and adverse effects from weather events in the emergency response plans. However, the plans do not identify specific hazards, safeguards, or mitigation to reduce the effects of extreme weather events.

The EPA inspection team has identified AOCs at the end of this inspection report for this program element.

40 CFR § 68.69 – Operating Procedures

The Facility has developed written operating procedures that include written instructions to safely start up, shut down, and maintain normal operations. Included in the operating procedures is an overview section that gives an introduction and purpose for each operating procedure. This

introductory section also provides a list of references, tools and supplies needed, personal protective equipment (PPE) requirements, and any unique hazards. The references list links to documents that will be helpful or needed for the operating procedures, such as the consequence of deviation tables which give safe operating limits. ONEOK has also developed separate safety procedures covering all units, such as lockout/tagout, confined space entry, and opening process equipment.

The operating procedures are accessible to all employees through ONEOK's intranet, with hard copies of the standard procedures available in the operations console room. Console operators review the operating procedures with field operators and maintain communication while procedures are being performed. To ensure operating procedures are accurate and up to date the documents are certified annually. If a potential change is identified, a supervisor will review the change and decide if it is timely and appropriate. If a change is made to an operating procedure an email notification is sent out to operators to alert them of the change. The EPA team did not compare the hard copy versions of the operating procedures in the console room with those in the online data system. However, based on verbal information from operators in the control room, they rely on the most current updated versions of operating procedures online for directing activities with field operators.

While conducting interviews in the console room the EPA inspection team was able to observe a truck loading operation at the Propane/Butane Loading Rack. During this operation, the console operators received a call from the truck driver before staging at the loading rack. Once the rack was ready, the operator overseeing the loading gave permission for the driver to hook up and start filling the truck. After the truck was filled, the console operator closed all valves before the driver disconnected. This was an example of Facility personnel following the procedure outlined in the document titled "74. MMP-CCCS-OG-013 – OSBL Operations – HVL".

40 CFR § 68.71 – Training

ONEOK has developed a corporate wide training structure that all new employees must complete (File CCCS-TrainingCertificationPlan). Prior to starting on the job training (OTJT) at either the Splitter Unit or Terminal Unit operating area, an employee must complete a set of both corporate and site-specific training. The corporate training includes topics such as new employee orientation, hazardous waste operations (HAZWOPER), and health and safety. For the site-specific training the employee must become familiar with the facility's process safety management (PSM) plan, the emergency response plan, and complete boiling liquid expanding vapor explosion (BLEVE) training. New employees may be placed in positions requiring more experience but will still be required to complete the corporate and site-specific training if they intend to pursue any of the following credentials: process operator-in-training, department of transportation qualified individual, area-qualified process operator, certified process operator, console operator-in-training, qualified console operator, or, certified console operator.

Once the newly hired employee completes the corporate and site training, they receive the title of process operator-in-training. The new employee's supervisor will regularly discuss specific training needs with the employee in order to achieve progress from process operator-in-training to certified process operator. To obtain operator certification in the Condensate splitter the employee must demonstrate that they understand the process by doing both a walking tour demonstration of the unit

with a supervisor and an experienced process operator to verbally confirm knowledge of the process. The verbal test is followed by a written certification exam. The Facility provided walking tour demonstration verbal test certifications and completed written exams for the two most recently certified operators to the EPA inspection teams for review. The topics covered were comprehensive, covering both the OSBL and ISBL sections of the Condensate Splitter Unit.

If a certified process field operator wants to become a certified console operator, the individual may be selected by the supervisor to begin as a console operator-in-training. Even if an employee is directly hired from outside the company to be a console operator, the individual must still obtain the internal process operator certification. Console operators-in-training will apprentice with (“shadow”) senior operators and be assigned a designated trainer. For a console operator-in-training to become certified they must demonstrate they understand the process and console operations through walking tour demonstrations and a certification exam. Facility representatives stated that console operators are first certified to work on the light ends process before being certified on the heavy ends process.

Certified process field and console operators must be re-certified at least every three-years. These re-certifications consist of reviewing different topics for both process field and console operators, and both require taking and passing another certification exam. Each employee’s training is kept online in the individual’s employee file. The EPA inspection team’s review of the corporate 24-month and 36-month training records showed that some employees were approximately a month overdue on training for certain topics at the time of the inspection. In the 24-month training records reviewed (File 116. Matrix Trainings – 24 month – Corpus Christi), fifteen operators were found to be past due on their First Aid and cardiopulmonary resuscitation (CPR) training. The employees previously completed CPR training on 1/20/2022 or 2/03/2022. In the 36-month training records reviewed, five operators were overdue for nine training topics. The training topics include compressed gas, ladder safety, and electrical safety awareness (File 116. Matrix Trainings – 36 month – Corpus Christi). The EPA inspection team has identified AOCs at the end of this inspection report for this program element.

40 CFR § 68.73 – Mechanical Integrity

ONEOK provided the EPA inspection team copies of multiple procedures the Facility uses to maintain the on-going integrity of process equipment. Procedures shared with the EPA inspection team included guidance for completing inspections of piping, vessels, and corrosion under insulation (CUI) as well as how to document and assess results. Content of the procedures reflected details the EPA inspection team discussed with the maintenance supervisor and the process engineer involved with fixed equipment inspections while at the Facility.

Procedure MIR-2.2, Inspection of Pressure Vessels (File MIR 2.2 Inspection of Pressure Vessels Rev. 1), defines inspection intervals, provides guidance on equipment circuits, sets a minimum number of condition monitoring locations (CMLs) for recurring inspections, and includes lists of information that should be reviewed and documented during inspections. The procedure incorporates guidance from the most current versions of API standard 510 and API standard 572. Pressure vessel inspections are completed on a time-based interval at the Facility. External visual inspections are set to be performed at a maximum interval of five (5) years. Internal visual inspections must be performed at a maximum

interval of ten (10) years or half of the remaining expected life of the equipment, and thickness inspections at a maximum interval of 10 years or half of the remaining expected life of the vessel.

ONEOK installed the condensate Splitter Unit and associated equipment in 2017, so the Facility has not completed the first round of frequency-based internal and thickness inspections for much of the equipment present on-site. However, the Facility has completed internal visual inspections during turnaround activities when equipment is not operational. The Facility provided internal visual inspection records of the debutanizer, VT-2005, completed in 2019 (File Debutanizer VT-2005_VISINT(Limited)_4-19-2019) and diesel product heat exchanger, E-3866, completed in 2022 (File Diesel Product Exchanger E-3866_VISINT_7-7-2022). Reports contain the date of the inspection, the name of inspectors, a description of the inspection performed, and the results of the inspection. A checklist was used to record whether certain areas of the equipment were visually noted as 'acceptable', 'not acceptable', 'needs further inspection', and 'priority' for the debutanizer. A more simplified 'OK' or 'Not OK' was used on the checklist for the heat exchanger. Both reports contain comment sections to record observations and photos of the equipment areas inspected. No actionable issues were noted for either equipment.

External inspection records were reviewed for the aqueous ammonia tank VST-2007 (File Aqueous Ammonia Tank VST-2007_5-28-2021_VISEXT), debutanizer VT-2005 (Files Debutanizer VT-2005_3-26-2021_VISEXT, feed surge drum VC-2001 (Feed Surge Drum VC-2001_5-21-2021_VISEXT), and butane/propane storage vessels VST-174/175/176/177/178/179 (Files LPG Bullet Tank VST-174_11-1-2022_VISEXT, LPG Bullet Tank VST-175_11-1-2022_VISEXT, LPG Bullet Tank VST-176_11-1-2022_VISEXT, LPG Bullet Tank VST-177_11-1-2022_VISEXT, LPG Bullet Tank VST-178_11-1-2022_VISEXT, and LPG Bullet Tank VST-179_11-1-2022_VISEXT). Reports contain the date of the inspection, the name of inspectors, a description of the inspection performed, and the results of the inspection. A checklist was used to record whether certain areas of the equipment are visually noted as 'OK' or 'Not OK'. All areas were noted as 'OK' with no major issues noted for any of the equipment. Dates of external visual inspections were listed as completed in 2021 or 2022.

ONEOK follows the recommended inspection intervals for relief devices listed in the most current version of API standard 510 of at least every five years. The Facility tracks the in-service date of each pressure relief device (File ISBL and OSBL PSV In-Service Dates) and records the latest completed inspection dates and future inspection dates (File ISBL PSVs) with associated equipment, last inspection date, and next inspection date. Most pressure relief devices were installed in 2017. As such, the most recently completed inspection dates were either 2022 or prior. However, there were five pressure safety valve devices (PSV-1323, PSV-354, PSV-363, PSV-715, and PSV-717) with listed inspection dates of 2023 or 2024 that have in-service dates of 2017. Two pressure safety valves, PSV-354 and PSV-363, had additional testing in 2018 and two pressure safety valves, PSV-715 and PSV-717, were removed from service in 2021 then reinstated in 2023. Inspections for the remaining device, PSV-1323, appeared to exceed the required five-year interval listed in API 510 (2014) Section 6.6.3.2(a).

ONEOK maintenance staff complete preventative maintenance and monitoring of rotating equipment for the condensate splitter. Many pumps are continuously monitored in the field so staff can react quickly when abnormalities arise. Other pumps are tested monthly to review vibration levels during

operation. Maintenance staff also complete weekly tank, booster pump and unloading pump inspections.

The EPA inspection team discussed with the Area Maintenance Supervisor other work tasks completed by ONEOK maintenance staff to maintain equipment and complete requested repairs. The condensate splitter area maintenance group consists of three maintenance operators, five instrumentation and electrical technicians, and three rotation technicians who are able to complete most of the requested work at the Facility. Specialty tasks that require entry into confined spaces, use of breathing air, or welding are completed by contractors. Maintenance staff complete work orders that are scheduled by the area maintenance supervisor, and which are discussed at daily safety meetings held at the Facility. Daily field observations are also conducted by maintenance staff to record key process parameters and observe equipment status. Any issues found are discussed with the area maintenance supervisor to determine how to proceed. Work orders are created and tracked using a computer software program database, Advanced Maintenance Management System (AMMS).

The EPA inspection team has identified AOCs at the end of this inspection report for this program element.

40 CFR § 68.75 – Management of Change (MOC)

ONEOK adopted Magellan Midstream’s Management of Change program at the time of Facility acquisition to ensure that process and equipment change impacts and risks are assessed and mitigated, and that the change meets company and regulatory requirements. ONEOK documents in its written MOC policy the types of process or equipment changes that would and would not require an MOC request (MOCR) (File _SIP-ADM-11.01 – Management of Change), as well as the roles and responsibilities of stakeholders involved. The Facility additionally has a “FAST (accelerated) MOCR”, for when a change needs to be implemented to prevent a potential immediate or significant negative impact to Facility operations (File 11.01-ADM-002 – Corpus Christi Splitter FAST Management of Change). MOCs are tracked within the compliance management system (CMS), which documents the technical basis, impacts, required approvals, time period, and generated action items of the MOCs. An MOCR can be initiated by anyone within the Facility, and the asset supervisor reviews the request prior to stakeholder review. Facility representatives stated that the set of stakeholders who review all MOCs are, at a minimum, an air specialist, an environmental specialist, and a safety specialist. Stakeholders involved may provide input and determine impacts. FAST MOCs may be approved by verbal confirmation or email discussions, however, MOC documentation must still be generated in the CMS.

The Facility uses a *LiveLink* web-based form to send employees notifications of process or equipment changes resulting in an MOC. The area supervisor is responsible for printing the confirmation form and obtaining signatures of all relevant personnel. The Facility provided example sign off sheets, which conform with the Facility’s Notification Procedure, to employees involved in a changed process or contract employees that were affected by the change prior to start-up of the process or affected parts of the process (Files 119. MOC-20240209-001 P-1805 Diesel Flush and 119. MOCR-20231005-008 Vacuum Compressor Sign Off). The Facility has initiated over 300 MOCs for the Splitter Unit process since 2019, and at the time of the inspection, all but 23 MOCs were listed as complete. The remaining

MOCs were in various stages of approval, implementation, or pre-startup review, and only one had an origination date of greater than a year from the time of the inspection (MOC-20220930-002). The facility stated that a majority of open MOCs will be implemented and completed during the 2024 Turnaround.

40 CFR § 68.77 – Pre-Startup Safety Review (PSSR)

ONEOK had adopted Magellan Midstream’s PSSR procedure at the time of Facility acquisition to ensure work on new or modified assets is completed properly, and to ensure employees are notified and trained on new or modified processes. The PSSR initiative is documented in a policy which is associated with a checklist that reviews the requirements to confirm a process change (Files _SIP-ADM-9.05 – Pre-Startup Safety Reviews and 09-FORM-1024 – Pre-Start Up Safety Review). The checklist, documents associated with the PSSR, and action items are maintained in the Facility’s CMS. The checklist verifies that: equipment has been installed to design specifications; proper testing has been performed and documented; safety, operational, maintenance, and emergency systems and procedures are implemented; a PHA has been performed; PHA recommendations are resolved; other stationary source requirements are addressed; and, employees are trained prior to startup.

40 CFR § 68.79 – Compliance Audits

ONEOK completed their most recent compliance audits of the Corpus Christi Facility condensate splitter in 2019 and 2022, using audit teams with members from both ONEOK corporate offices as well as site personnel. The 2019 compliance audit identified 29 findings in multiple program areas related to updating and ensuring consistent documentation, tracking of actions in a centralized location (i.e., the CMS), and ensuring procedures are followed (File 2019 Splitter PSM audit summary final). The 2022 compliance audit identified 22 findings related to resolving discrepancies found on P&IDs, improving procedures, ensuring safeguards are implemented, and completing annual reviews (File 2022 splitter PSM audit notes, CMS tasks PSM RMP audits).

While it appears that all action items from the 2019 compliance audit have been completed, the Facility did not consistently document the corrective actions taken for each action item. Additionally, the completion notes for a few of the 2019 action items state that the action was not completed until the 2022 compliance audit (File CMS tasks PSM RMP audits). As such, the Facility has not promptly determined or documented an appropriate response to each of the findings of the 2019 compliance audit, nor documented that deficiencies have been corrected, as required by the rule.

The EPA inspection team has identified an AOC at the end of this inspection report for this program element.

40 CFR § 68.81 – Incident Investigation

The Facility has an incident investigation procedure that covers process safety incidents subject to RMP, as well as incidents of lesser severity or other incident types (e.g., near misses, personnel safety) (File _SIP-ADM-13.02 – Incident Investigation). This policy defines two levels of incident investigation - Level 1 for major or significant incidents and Level 2 for minor incidents. Each level requires different

procedures and timelines for reporting. For all incidents, the Facility uses an established root cause investigation methodology to identify probable causes, corrective actions, and lessons learned. Additionally, the Facility has separate, distinct procedures for incident reporting and release reporting, as well as action item resolution (Files _SIP-ADM-13.01 – Incident Reporting, 13.01-ADM-001 – Release Reporting, and c. SIP-ADM-14.02 – Action Item Resolution). The incident reporting procedure defines the types of incidents, roles and responsibilities for incident reporting, and information required for incident reports. The release reporting procedure defines reportable and non-reportable releases, internal and external entities who must be notified in the event of a release, and roles and responsibilities for release reporting. The Facility documents incident investigations, including corrective actions in their network-based CMS.

The Facility provided the investigation reports for two incidents that occurred in 2017 and 2018. However, the EPA inspection team focused on incidents that occurred in the most recent previous five years from the EPA inspection date. As discussed in the Five-Year Accident History section of the report, the Facility investigated two incidents in the last five years, in addition to the December 2020 incident previously discussed under the General Duty Clause section of the report: a hydrogen sulfide release on January 11, 2020; and, a butane release on May 20, 2023.

The January 2020 incident was caused by insufficient control procedures to adjust the discharge pressure on the vacuum compressors within the splitter processing area when the recycle compressors are shut down. The incident report did not specify the quantity of vapors containing hydrogen sulfide released, the on-site or off-site consequences, or the date the incident investigation began. The report documents the identified causes, corrective actions, person responsible, and due dates (File 85. CCCS H2S Leak Incident Report rev 3). The subject vacuum compressors were determined to be obsolete and were removed from service as a result of this incident. The May 2023 incident at the truck loading rack was caused by a component failure on the butane loading hose, as well as non-functioning Emergency Discharge Control Equipment on the third-party truck, releasing an estimated 7.3 gallons of butane to the atmosphere. The incident resulted in one third-party injury. While the incident report does not include the date the incident investigation began, it does provide a detailed timeline of the incident, an assessment of contributing factors, and corrective actions taken (File 85. II Truck Loading Rack Butane Release). The facility indicated that their incident investigation reports are a combination of the internal Incident Report and the internal Incident Data Report. Incident Data Reports for January 2020 and May 2023 incidents were provided to EPA and ERG subsequent to the inspection, which contained the data not included in the separate internal Incident Reports; however, these were not attached nor referenced in the final incident investigation reports.

The Facility provided documentation of the status of action items for each of these incidents at the time of the EPA inspection. A total of 11 action items were developed from the two investigations, and all are noted as completed, with one item cancelled due to lack of access, and one item completed six days past the due date (Files 85. CCCS H2S Leak Incident Report rev 3, 85. II Truck Loading Rack Butane Release, and 127. Cms report vac compressor). Facility representatives stated that incident reports are reviewed at Safety Meetings, which are attended by personnel in the affected work area or with job tasks related to the incident.

The EPA inspection team has an identified AOC at the end of this inspection report for this program element.

40 CFR § 68.83 – Employee Participation

ONEOK has developed a procedure for employee participation in various aspects of the safe operation of the facility (File MMP-CCCS-EP-001 – Employee Participation). This document summarizes how employees are integrated into maintenance and development of the Facility’s RMP and PSM programs, including conducting PHAs. From on-site interviews, the EPA inspection team learned that all employees are invited to participate, but the PHA team is selected based on schedule and availability, and certain operators must participate. All PHAs and findings can be accessed by the employees through the ONEOK intranet site. The Facility also conducts monthly safety meetings attended by all employees to share and discuss any major changes or important topics (File 118. Safety Engagement Meetings Nov 23 Dec 23 Jan 24).

40 CFR § 68.85 – Hot Work Permits

ONEOK has developed and implemented a hot work procedure (File 5.05-ADM-062 – Hot Work) that encompasses all ONEOK employees and contractors working at the Corpus Christi Facility which could include tasks having an ignition source. The hot work permit is an attached section to the facility’s authorization to work (ATW) permit (File 05-FORM-5000 – Authorization to Work (2 page)) and must be completed unless the area is designated as a “hot work permit free” area. To obtain a hot work permit, an authorized permit issuer must ensure the hot work permit section of the ATW is valid with all signatures obtained. The permit issuer shall also perform a thorough inspection of the work area to identify possible hazards. For spark producing hot work, air monitoring must be performed for the entire duration of the hot work within 35 feet of the work area. Trained fire watch personnel must also be present at the job site during the hot work and remain 30 minutes after work is completed. Permits must be revalidated if potential changes in operations take place that could create another hazardous condition, if work is delayed by more than one hour, if the job is vacated by all personnel, or if there is a change in the foreman/inspector/permit issuer. While on site the EPA inspection team was given folders of completed hot work permits to review. No issues were identified with the completed permits and all required fields were completed.

40 CFR § 68.87 – Contractors

ONEOK has a corporate contractor policy requiring contractors to enroll in *ISNetworld* (ISN), a third-party contractor safety data management provider, in order to become qualified to perform work at the Facility. However, if a contractor is considered low risk, they are not required to enroll in ISN (File 3.01-ADM-001 Contractor Pre Qualification). If a company wishing to do work at the Facility has a “green flag” in ISN, then they may be allowed to work at the Facility. If the flag is yellow or red, they may still be able to perform work if further requirements are met. During the EPA inspection team’s document review, a discrepancy in the Magellan documents was found between the contractor pre-qualification form and the ISN contractor safety score card. In the pre-qualification form it says a red flag contractor can be used with further requirements, but on the score card it says a red flag contractor cannot be used (File 03-STD-001 Contractor Safety Scorecard). One of the further

requirements is that the contractor must provide a contractor mitigation plan which addresses mitigation steps for addressing unsatisfactory programs, injuries, and/or fatalities. Before a contractor completes work, they will receive a job plan that is completed by a facility employee. The job plan contains a job description, contacts for facility employees, job steps with associated hazards, and other important information for the contractor to complete the job. While a contractor is doing work on site a contractor inspection checklist may be completed by the Magellan project manager to ensure that the contractor is meeting all safety standards set by the Facility.

The Facility provided their most recent inspector checklists for three contractors, completed on 2/22/2024, 2/29/2024, and 2/22/2024, respectively. These checklists contain elements of safe work practices and include the option for the contractor's performance to be marked as satisfactory, not satisfactory, or not applicable. The EPA inspection team was also informed that, after the December 2020 incident, the Facility started to require contractors to submit a bonding and grounding plan to mitigate the risk of electrostatic ignition during tank cleaning (File 83. 5.05-ADM-042— Bonding & Grounding Portable Equipment).

40 CFR § 68.95 – Emergency Response

ONEOK is a non-responding facility that employs a contractor to respond to emergencies on site. The emergency plan provided for the EPA inspection team's review (File Corpus Christi Terminal _FRP – EPA USCG PHMSA126202492249736) describes coordination and notification actions for multiple emergency scenarios, including spills, fires, explosion, hydrogen sulfide releases, medical emergencies, extreme weather conditions, and security threats. Each scenario has a reference checklist that includes step-by-step actions for designated personnel. The checklist also has fields for responsible personnel to initial each step when completed. Templates are also included to document details of the emergency to provide to responders or to report to external agencies. A portion of the emergency plan covers scenarios specific to the condensate splitter in more detail, including staff responsibilities and resulting actions. This portion of the plan also includes instructions to follow shut down procedures where possible, notifying the third-party response contractor, and the Corpus Christi Fire Department to request emergency response assistance, and evacuating the affected areas. The emergency plan includes a detailed hurricane and catastrophic weather plan, as the Facility is located along the Gulf Coast in an area prone to extreme weather conditions. A map of fire safety equipment and lists of safety equipment on site are also included in the emergency plan, including fire extinguishers, fire monitors, deluge systems, emergency shutdown buttons, eyewash stations, and safety showers. Internal and external contact information is included for quick reference. During the inspection, Facility personnel noted that an electronic copy of the emergency plan is available for all employees through a shared folder on the ONEOK intranet site, as well as a printed copy located in the console room.

The Facility completed annual emergency response coordination with the local emergency planning commission (LEPC) (File LEPC ERA Meeting 10-FORM-1100 LEPC 10-12-2023), Corpus Christi Police Department (File LEPC ERA Meeting 10-FORM-1100 CCPD-Metrocom 11-16-23), Corpus Christi Fire Department (File LEPC ERA Meeting 10-FORM-1100 CCFD 10-12-2023), Corpus Christi Sheriff Department (File LEPC ERA Meeting 10-FORM-1100 CC Sheriff Dept 11-16-2023), and Port of Corpus Christi Police Department (File LEPC ERA Meeting 10-FORM-1100 Port CCPD 12-13-2023). The Facility provided forms for the last three years that documented names, contact information, dates, and brief

descriptions of coordination activities. All records indicated that ONEOK provided the identified contact with an updated copy of the emergency response plan.

The Facility also completes annual tabletop and field drills. Tabletop drills involve review of an identified scenario with both ONEOK personnel and attending external responders. ONEOK personnel stated that the LEPC, Corpus Christi Fire Department, and ONEOK's third-party response contractor are always invited, but attendance will depend on their availability. Recorded attendance for the 2023 tabletop drill for a release and vapor cloud emergency scenario included participation from multiple ONEOK staff, the LEPC, Corpus Christi Fire Department, and the ONEOK third party response contractor (File SMT Tabletop Exercise Sign In 2022, 2023). During field drills, the Facility also concurrently completes the annual notification exercise to emergency responders, and on-site staff practice evacuation procedures and assemble at the identified muster points.

A contractor completes the maintenance of on-site emergency equipment, which includes air-supplied respirators, fire extinguishers, fire monitors, deluge systems, eyewash stations, and safety showers. The Facility provided records showing completed monthly respirator checklists (File Annual 2023 Monthly PIVs Splitter Report - Universal), annual fire extinguisher checklists (File Annual 2023 Fire Extinguishers Splitter 0084 – Universal), annual inspection and testing of the deluge sprinkler system around the liquefied petroleum gas (LPG) bullet tanks (File bullet tanks fire monitor loop annual inspection 12.15.23), and annual inspection and testing of alarms and fire eye detectors around the LPG bullet tanks (File Bullet tanks Fire Alarm annual 12.15.23). When deficiencies were listed, notes were included on the actions taken to fix the identified issues.

40 CFR § 68.190-195 - Risk Management Plan Updates and Required Corrections

ONEOK submitted RMPs to EPA in 2016 and 2021. The resubmissions were within the required 5-year time frames. The five-year accident history in the most recent RMP submission was not updated within six months of the date of the reportable accident that occurred in May 2023. While at the Facility, the EPA inspection team confirmed that the emergency contact information included in the most recent RMP submission was correct and had not changed.

CLOSING CONFERENCE

Lead Inspector Federoff initiated the closing conference at 10:30 am on Thursday, February 15, 2024. She reviewed the post-inspection Document Request List and asked ONEOK representatives to provide the responses within two weeks after the conclusion of the inspection. She stated that the EPA inspection team would not discuss any areas of concern until all the requested documents had been provided and the team could thoroughly review the provided information. Inspector Federoff discussed the estimated timing for delivery of the inspection report to ONEOK and the expected coordination between U.S. EPA and ONEOK. She also clarified that the report would include review of both the Terminal and Splitter Units in the same report. Inspector Federoff responded to a Facility representative that asked a question about the format of the report and how findings would be presented. There were no further questions from the ONEOK personnel, and she adjourned the closing conference adjourned at 10:55 am, whereupon the inspection team departed the Facility.

AREAS OF CONCERN

[AOC 1] Applicability, 40 CFR § 68.10(a)(3) – *Except as provided in paragraphs (b) through (f) of this section, an owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under § 68.115, shall comply with the requirements of this part no later than the latest of the following dates: (3) The date on which a regulated substance is first present above a threshold quantity in a process.*

The RMP covered process at the Facility, as defined by the company, excludes the piping, stripper vessels, and storage tanks for heavy naphtha, kerosene, diesel, and ATB after the main fractionator column. However, the vessels and storage tanks are all interconnected to the condensate splitter process, which would potentially require the equipment to be included in the RMP covered process. The RMP covered process at the Facility also excludes piping, vessels, and product storage tanks after the naphtha chiller. However, all piping, vessels, and storage tanks containing light naphtha, especially equipment interconnected to and after the chiller, should be included in the RMP covered process since the material has an NFPA flammability hazard rating of 4 and is considered a flammable mixture.

[AOC 2] Five-year Accident History, 40 CFR § 68.42(a) – *The owner or operator shall include in the five-year accident history all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage.*

ONEOK did not update the RMP registration five-year accident history with information for the May 20, 2023, accident, even though the accident resulted in an injury on site.

[AOC 3] Process Safety Information (PSI), 40 CFR 68.65(d)(1)(iii) – *(d) Information pertaining to the equipment in the process. (1) Information pertaining to the equipment in the process shall include: (iii) Electrical classification.*

The EPA inspection team identified inconsistencies between the provided electrical classification drawing, 475-D-8000-3_HAZ_Class_SITE_PLAN.pdf, and the location of equipment observed during the field inspection. Due to these observed inconsistencies, the Facility has failed to maintain accurate PSI, by failing to ensure that the electrical classification information was accurate and up-to-date in accordance with 40 CFR § 68.65(d)(1)(iii) for the following vessels:

- Storage Tank 168 was physically observed in the Terminal Unit at the Facility but was not shown on the electrical classification drawing;
- Storage tanks 138 and 139 were physically located in the diked area of the Terminal Unit at the Facility, but were shown as located outside of the diked area on the electrical classification drawing;
- Storage tanks 138 and 139 were missing tank label designations on the electrical classification drawing; and,
- The area around the flare was not shown with any electrical classification.

[AOC 4] Process Safety Information (PSI), 40 CFR 68.65(d)(2) – *(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.*

Process piping throughout the Facility was not sufficiently labeled or color-coded to indicate the contents or direction of flow, per ASME standard A13.1 (2023). As a result, this equipment does not conform with recognized and generally accepted good engineering practices per 40 CFR § 68.65(d)(2).

[AOC 5] Process Hazard Analysis, 40 CFR § 68.67(c)(5) - *The PHA shall address stationary source siting.*

The PHAs do not address stationary source siting to anticipate, prevent, and possibly mitigate, adverse effects from high winds, flooding, and extreme weather events in the covered process, even though the Facility is located in a coastal area in Corpus Christi, Texas, which has an increased risk of adverse extreme weather effects during intense storms and hurricanes which may be exacerbated by climate change.

[AOC 6] Process Hazard Analysis, 40 CFR § 68.67(e) – *The owner or operator shall establish a system to promptly address the team’s findings and recommendations; assure that the recommendations are resolved in a timely manner and that the resolution is documented.*

The 2017 ISBL PHA revalidation included at least 44 action items that were documented as completed after the established due date, ranging from one week to two years late. While approximately 10 of these action items were noted as having incorrect due dates assigned, the other action items were not completed in a timely manner.

[AOC 7] Training, 40 CFR § 68.71(b) - *Refresher training shall be provided at least every three years, and more often, if necessary, to each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process. The owner or operator, in consultation with the employees involved in operating the process, shall determine the appropriate frequency of refresher training.*

The 24-month and 36-month required refresher training records showed that multiple employees were overdue for multiple training sessions. This includes 15 operators overdue for 24-month refresher training and 5 operators overdue for 36-month refresher training.

[AOC 8] Mechanical integrity, 40 CFR § 68.73 (d)(3) - *Inspection and testing. The frequency of inspections and tests of process equipment shall be consistent with applicable manufacturers recommendations and good engineering practices, and more frequently if determined to be necessary by prior operating experience.*

One pressure relief device, PSV-1323, with an in-service date of 2017, was not documented as inspected until 2023 and 2024. The facility indicated that documentation exists that a test was conducted in 2019, but the full inspection package was not available. Based on the available records,

inspections for this device occurred at an interval which exceeded the five-year limit, as required in API standard 510 (2014) Section 6.6.3.2(a).

[AOC 9] Compliance Audits, 40 CFR § 68.79(d) – *The owner or operator shall promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected.*

The documentation of response activities and completion status of the 2019 audit findings was incomplete and corrective actions were overdue. Multiple findings from the 2019 audit were not addressed until the initiation of the 2022 compliance audit, nearly three years after the 2019 audit was completed. There are four action items from the 2019 compliance audit that are marked as complete in 2019 and 2020, but which have no description of the actions taken to correct the identified deficiencies. An additional five action items from the 2019 compliance audit have completion dates in 2022, where the description of actions taken to correct the deficiency includes a statement that they were "Completed by audit team during 2022 PSM audit." One action item named "PSM Training Formalize the Operator Certification" is marked as completed in 2022 but includes no description of the actions taken to correct the identified deficiency.

[AOC 10] Incident Investigation, 40 CFR § 68.81(d) – *A report shall be prepared at the conclusion of the investigation which includes at a minimum: ... (2) the date the investigation began.*

The January 2020 and May 2023 incident investigation final reports did not include the dates the investigations for each incident began. For Incident Investigations, the ONEOK Procedure SIP-ADM-13.02 refers to the incident data report and the incident investigation report as separate, stand-alone reports where the information within the incident data report is used to develop the incident investigation report. The regulatory text in 68.81(d) states, "a report shall be prepared at the conclusion of the investigation which includes...". This implies that all of the information should be in a single report. The provided incident investigation reports for the January 2020 and May 2023 incidents do not include the dates the investigations for each incident began and do not reference nor include the incident data reports as an attachment to the final investigation reports.

[AOC 11] Required Corrections, 40 CFR § 68.195(a) – *New accident history information—For any accidental release meeting the five-year accident history reporting criteria of § 68.42 and occurring after April 9, 2004, the owner or operator shall submit the data required under §§ 68.168, 68.170(j), and 68.175(l) with respect to that accident within six months of the release or by the time the RMP is updated under § 68.190, whichever is earlier.*

The May 2023 accident was not added to the five-year accident history in the RMP registration through an update required within six months of the date of the incident.

[AOC 12] Defining Offsite Impacts—Population, 40 CFR § 68.30(c) – *Data sources acceptable. The owner or operator may use the **most recent** Census data, or other updated information, to estimate the population potentially affected.*

The OCA completed for the November 2021 RMP registration five-year update used 2010 Census data to determine affected population. Since the 2020 Census data was publicly released September 16, 2021, the OCA WCS and ARS completed October 21, 2021, should have been updated using the 2020 Census population data.

LIST OF ATTACHMENTS

- Attachment 1: Notice of Inspection and Right to Claim Confidentiality
- Attachment 2: Opening Meeting and Interview Sign-In Sheet
- Attachment 3: Document Request List
- Attachment 4: Photograph Log



NOTICE OF INSPECTION

U.S. ENVIRONMENTAL PROTECTION AGENCY Region VI

Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) §103;
Emergency Planning and Community Right-to-Know Act (EPCRA) §§302-312; and
Clean Air Act §112r Risk Management Program (CAA RMP)

DATE: February 12-15, 2024

FACILITY NAME: Magellan Midstream Partners, L.P.

LEAD INSPECTOR:

Amy Federoff, ERG
14555 Avion Pkwy Suite #200,
Chantilly, VA 20151

FACILITY ADDRESS:

15 Country Club Drive,
Corpus Christi, Texas 78407

REASON FOR INSPECTION: U. S. EPA is conducting this inspection for the purpose of determining compliance with the requirements of Section 103(e) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Sections 302 through 312 of the Emergency Planning and Community Right-to-Know Act (EPCRA), and Section 112(r) of the Clean Air Act (CAA).

The scope of this inspection may include, but is not limited to reviewing and obtaining copies of documents and records; interviews and taking of statements; reviewing of chemical manufacturing, importing, processing, and/or use facilities, including waste handling and treatment operations; taking samples and photographs; and any other inspection activities necessary to determine compliance with the Acts.

INSPECTOR SIGNATURE

Amy Federoff

RECIPIENT SIGNATURE

Danny Scroggins

NAME (Print):

Amy Federoff

NAME (Print):

Danny Scroggins

TITLE:

Inspector

DATE SIGNED:

2/12/2024

TITLE

Sr. Attorney

DATE SIGNED

2/12/24



RECEIPT OF NOTICE OF RIGHT TO CLAIM CONFIDENTIALITY

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region VI

Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) §103;
Emergency Planning and Community Right-to-Know Act (EPCRA) §§302-312; and
Clean Air Act §112r Risk Management Program (CAA RMP)

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Corpus Christi, Texas 78407

Notice of Right to Claim Confidentiality: You may assert a business confidentiality claim covering all or part of the information requested during the course of this inspection, as provided in 40 C.F.R. §2.203(b). To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document over which you make a claim of confidentiality should be marked by either attaching a cover sheet stamped or typed with a legend to indicate the intent to claim confidentiality. The stamp or typed legend or other suitable form of notice should employ language such as "trade secret" or "proprietary" or "company confidential" and indicate a date if any when the information should no longer be treated as confidential.

All confidentiality claims are subject to agency verification and must be made in accordance with 40 C.F.R. §2.208 which provides in part that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; and that the information is not and has not been, reasonably obtainable by legitimate means without your consent.

NOTE: Signature of this Receipt of Notice of Right to Claim Confidentiality verifies only that such notice has been received and does not waive that right.

INSPECTOR SIGNATURE

Amy Federoff

RECIPIENT SIGNATURE

Danny Scroggins

NAME

Amy Federoff

NAME

Danny Scroggins

TITLE

Inspector

DATE SIGNED

2/12/2024

TITLE

Sr. Attorney

DATE SIGNED

2/12/24



INSPECTION ATTENDANCE SHEET

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region VI

Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) §103;
Emergency Planning and Community Right-to-Know Act (EPCRA) §302-312; and
Clean Air Act §112r General Duty Clause (GDC) and Risk Management Program (RMP)

DATE: February 12-15, 2024

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LEAD INSPECTOR:

Amy Federoff, ERG
14555 Avion Pkwy #200,
Chantilly, VA 20151
Telephone: (703) 633-1600

FACILITY ADDRESS:

15 Country Club Drive,
Corpus Christi, Texas 78407

NAME	AFFILIATION/TITLE	PHONE	EMAIL
Danny Scroggins	ONEOK Sr. Attorney		
Brian Hoppe	ONEOK Mgr Process Eng		
Kelli Riddle	ONEOK Sr PSM Engineer		
Raleigh Myers	ONEOK Dir OPERATIONS		
Marshall Jiror	ONEOK MGR-Ops		
Ronny Keiser	ONEOK - AREA Supervisor		
Wis Renteria	ONEOK - Area Supervisor		
Crystal McGrew	ONEOK- Compliance Coordinator		
Jesse Cotton	ONEOK Logistics Supervisor		



DOCUMENT REVIEW/REQUEST LIST
U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VI

Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) § 103;
Emergency Planning and Community Right-to-Know Act (EPCRA) §§ 302-312; and
Clean Air Act § 112r Risk Management Program (CAA RMP)

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Item No.	Document Request Date	Document Description	Reviewed Prior to Site Visit	Provided for Onsite Review	Send a Copy to EPA
1	01/22/2024	Brief description of the operations, including the substances produced, processed, handled or stored onsite;	☒	☐	☐
2	01/22/2024	Brief description of the RMP covered process, including the boundary of where the process is considered to begin and end	☒	☐	☐
3	01/22/2024	Facility ownership/tenant history;	☒	☐	☐
4	01/22/2024	Date operations began;	☒	☐	☐
5	01/22/2024	Crude oil refining capacity	☒	☐	☐
6	01/22/2024	Annual production and storage volume of each saleable product;	☒	☐	☐
7	01/22/2024	Operating/shift schedule;	☒	☐	☐
8	01/22/2024	Total number of people employed, differentiating the number that are contractors;	☒	☐	☐
9	01/22/2024	Facility organization charts;	☒	☐	☐
10	01/22/2024	Block flow diagrams of the covered processes at the Facility;	☒	☐	☐
11	01/22/2024	Plot/site plans for the Facility;	☒	☐	☐
12	01/22/2024	A list of all Facility-wide shutdowns and start-ups since January 1, 2019, including the dates and reasons for each shutdown; and	☒	☐	☐
13	01/22/2024	A list of all process units at the Facility with information on processing capacity(ies), associated start-up dates, and whether each process unit is actively operating.	☒	☐	☐
14	01/22/2024	Safety data sheets (SDS) for all chemicals and other hazardous substances as required by EPCRA § 311.	☒	☐	☐



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Region VI

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15	01/22/2024	2019-2023 Tier II chemical inventory reports submitted by the Facility as required by EPCRA § 312.	☒	☐	☐
16	01/22/2024	A list of all CERCLA § 103 and EPCRA § 304 reportable releases from January 1, 2019 to present.	☒	☐	☐
17	01/22/2024	The management system developed to comply with 40 C.F.R. § 68.15. Include an organizational chart or similar document defining structure and responsibility for implementation of each requirement of the RMP program.	☒	☐	☐
18	01/22/2024	Support documentation required under 40 C.F.R. § 68.39 for each worst-case scenario and each alternative release scenario reported in the Facility's risk management plan	☒	☐	☐
19	01/22/2024	The five-year accident history records for the Facility as defined in 40 C.F.R. § 68.42,	☒	☐	☐
20	01/22/2024	December 2020 Incident Investigation	☒	☐	☐
21	01/22/2024	Alarm management policy/program	☒	☐	☐
22	01/22/2024	Written procedure(s) for conducting the process hazard analysis (PHA) for both the RMP covered processes and other processes on site under the General Duty Clause	☒	☐	☐
23	01/22/2024	Written procedures for developing, reviewing, approving, and certifying operating procedures, and documentation of the most recent three (3) annual certifications of all operating procedures for the RMP covered process	☒	☐	☐
24	01/22/2024	A list of all operating procedures referenced at the Facility	☒	☐	☐
25	01/22/2024	The most recent version of the tank cleaning procedure	☒	☐	☐
26	01/22/2024	Written procedures for the mechanical integrity (MI) program	☒	☐	☐
27	01/22/2024	Written procedures for the management of changes (MOC)	☒	☐	☐



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U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VI

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28	01/22/2024	Written procedures for conducting a pre-startup safety review (PSSR)	☒	☐	☐
29	01/22/2024	Complete copies of the two (2) most recent RMP compliance audit reports	☒	☐	☐
30	01/22/2024	Written procedures for conducting incident investigations	☒	☐	☐
31	01/22/2024	A list of incident reports/investigations for all incidents that resulted in, or could reasonably have resulted in (near misses), a catastrophic release of a regulated substance from January 1, 2019 to present	☒	☐	☐
32	01/22/2024	The incident investigation reports from the September 2017 and November 2018 incidents	☒	☐	☐
33	01/22/2024	Documentation of tracking mechanism used for corrective actions implemented as a result of root cause investigations	☒	☐	☐
34	01/22/2024	Documentation of communication mechanism used to notify affected employees and contractors of the findings of root cause investigations	☒	☐	☐
35	01/22/2024	The written employee participation plan and a list of labor unions and other organizations representing facility employees	☒	☐	☐
36	01/22/2024	Written procedure(s) for managing hot work including any referenced attachments	☒	☐	☐
37	01/22/2024	The written facility contractor policy	☒	☐	☐
38	01/22/2024	The written emergency response plan used at the Facility	☒	☐	☐
39	01/22/2024	A list of all process shutdowns and start-ups since January 1, 2019	☒	☐	☐
40	01/22/2024	Detailed process flow diagrams	☒	☐	☐



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41	01/22/2024	P&IDs	☒	☐	☐
42	01/22/2024	Electrical classification drawing	☒	☐	☐
43	01/22/2024	Cause-and-effect diagrams	☒	☐	☐
44	01/22/2024	SDS for chemicals and other hazardous substances used in the process	☒	☐	☐
45	01/22/2024	Process narrative descriptions	☒	☐	☐
46	01/22/2024	Process chemistry	☒	☐	☐
47	01/22/2024	Maximum intended inventory of chemicals	☒	☐	☐
48	01/22/2024	Safe upper and lower limits defined for each process	☒	☐	☐
49	01/22/2024	Evaluation of the consequences of deviation for each process	☒	☐	☐
50	01/22/2024	List of codes and standards used to design and maintain each process	☒	☐	☐
51	01/22/2024	Material and energy balances for each process	☒	☐	☐
52	01/22/2024	Safety systems and their functions	☒	☐	☐
53	01/22/2024	The most recent completed PHAs performed	☒	☐	☐
54	01/22/2024	Emergency shutdown procedures	☒	☐	☐



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55	01/22/2024	A list of all equipment currently overdue for inspection or testing	☒	☐	☐
56	01/22/2024	A list of changes made that required use of the Facility's MOC policy/procedure since 2019	☒	☐	☐
57	01/22/2024	A list of all clamps or temporary leak repairs currently installed	☒	☐	☐
58	01/22/2024	A copy of the most recently completed hot work permits during 2023 and 2024	☒	☐	☐
59	01/22/2024	Complete support documentation for the Off Site Consequence Analyses conducted for the most recent RMP registration	☒	☐	☐
60	2/12/2024	maximum intended inventory and concentration of aqueous ammonia	☐	☐	☒
61	2/12/24	The last 2 SIP system integrity audits	☐	☐	☒
62	2/12/24	Open work orders for the splitter	☐	☐	☒
63	2/12/24	Most recent closed work orders for Splitter for the last 2 months	☐	☐	☒
64	2/12/24	Last 2 months of vibrational monitoring for crude feed pumps, LPG pumps, and P-1031A/B	☐	☐	☒
65	2/12/24	Last 2 months of weekly pump PM tasks - splitter	☐	☐	☒
66	2/12/24	Semi-annual and annual PM tasks for the last 2 years splitter	☐	☐	☒
67	2/12/24	Site specific procedure for fin fan motor and fan shaft bearing greasing	☐	☐	☒
68	2/12/24	Basic Orientation Plus content - all parts hardcopy - scan	☐	☐	☒



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69	2/12/24	LMS operator technician progression for 2 recent technicians	☐	☐	☒
70	2/12/24	high-res zoomable version of Plot Plan from Overview slide deck	☐	☐	☒
71	2/13/24	Consequences of Deviation ISBL	☒	☐	☒
72	2/13/24	Consequences of Deviation OSBL	☐	☐	☒
73	2/13/24	MMP-CCCS-OG-007-E	☐	☐	☐
74	2/13/24	MMP-CCCS-OG-013-OSBL Operations - HVL	☐	☐	☒
75	2/13/24	MMP-CCCS-OP-001-Prepare for Startup	☐	☐	☒
76	2/13/24	MMP-CCCS-OP-002-Initial Normal Startup	☐	☐	☒
77	2/13/24	MMP-CCCS-OP-004-Temporary Operations	☐	☐	☒
78	2/13/24	MMP-CCCS-OP-005-Normal Shutdown	☐	☐	☒
79	2/13/2024	Incident report created for the December 2020 Tank 142	☐	☐	☒
80	2/13/2024	What-if hazard analysis created immediately following Dec. 2020 tank 142 incident	☐	☐	☒
81	2/13/2024	Contractor qualifications for current tank cleaning projects for Corpus site post-incident	☐	☐	☒
82	2/13/2024	Project plan for tank cleaning projects at Corpus for 2023	☐	☐	☒



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83	2/13/2024	Coordination of bonding plan for contractors used for tank cleaning for 2023	☐	☐	☒
84	2/13/2024	Evaluation completed for tank cleaning contractors in 2023 <i>contractor inspection form</i>	☐	☐	☒
85	2/13/2024	Incident investigations for 2 incidents listed in Request 18a from pre-inspection	☐	☐	☒
86	2/13/2024	current status of recommendations from incident investigations post-incident - all <i>2 photo 152</i>	☐	☐	☒
87	2/13/2024	Updated electronic version of pre-inspection request 18	☐	☐	☒
88	2/13/2024	Email notification used to communicate tank cleaning procedure update post-incident	☐	☐	☒
89	2/13/2024	Completed daily rounds for splitter from the last month <i>2 weeks</i>	☐	☐	☒
90	2/13/2024	into LPG unloading record log sheet from the last 2 weeks <i>console documentation</i>	☐	☐	☒
91	2/13/2024	The last two procedures completed between control room operators and field operators <i>OP</i>	☐	☐	☒
92	2/13/2024	OPS Sign-off sheets to confirm review of updates to procedures in MOC-20190917-006	☐	☐	☒
93	2/13/2024	The last two completed operator training signed off by senior operator for console	☐	☐	☒
94	2/13/2024	The last two completed tests for board operator training signed off by area supervisor	☐	☐	☒
85	2/13/2024	MOC-20210816-001, MOC-20240104-002, MOC-20190917-006 and associated attachments	☐	☐	☒
96	2/13/2024	The last 20 completed hot work permits	☐	☐	☒



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97	2/14/24	Piping labeling standard/guidance	☐	☐	☒
98	2/14/24	ATW Permit from 12/22/23 signed by Nick O'Briant for VCUPM dist h	☐	☐	☒
99	2/14/2024	External inspection report/data and U1-A forms for LPG bullets, VC-2001, de-butanizer, and aqua ammonia tank	☐	☐	☒
100	2/14/2024	Internal inspection report/data for heat exchanger E-3806 and de-butanizer	☐	☐	☒
101	2/14/2024	PSA/M listing of upcoming inspection and replacement for the next 3 years	☐	☐	☒
102	2/14/2024	Last 6 months of KPI mF - Jose mF - Jose	☐	☐	☒
103	2/14/2024	listing of all PSVs and associated equipment, install date, last replaced date, replace due date Jose	☐	☐	☒
104	2/14/2024	SDS for 19%, aqua ammonia	☐	☐	☒
105	2/14/2024	flare radiation analysis and flare exclusion zone	☐	☐	☒
106	2/14/2024	Most recent electrical classification drawing	☐	☐	☒
107	2/14/2024	Relief device standard	☐	☐	☒
108	2/14/2024	Relief device design calculation for: LPG bullet, VC-2001, aqua ammonia,	☐	☐	☒
109	2/14/2024	OSBL P&IDs for splitter	☐	☐	☒
110	2/14/2024	safety system site plan visitor presentation	☐	☐	☒



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111	2/14/2024	Testing and calibration records for LEL detectors, H ₂ S detectors, fire detectors for 2023	☐	☐	☒
112	2/14/2024	certification plan for all splitter operators	☐	☐	☒
113	2/14/2024	The last two completed field operator training signed by senior operator	☐	☐	☒
114	2/14/2024	The last two completed field operator test signed/approver by area supervisor	☐	☐	☒
115	2/14/2024	List of 2 most recently completed training dates and initial training dates for all operators on splitter	☐	☐	☒
116	2/14/2024	List of 2 most recently completed training dates and initial training dates for corporate training for all operators on splitter	☐	☐	☒
117			☐	☐	☒
118	2/14/2024	Last 3 months of agenda/summary for monthly safety meeting and sign-in sheet	☐	☐	☒
119	2/14/2024	Last 3 most recent training packet sign-off sheet and for MOCs	☐	☐	☒
120	2/14/2024	Last 3 most recent job plans provided to contractors	☐	☐	☒
121	2/14/2024	Last 3 contractor sample qualifications to approve contractors for work	Company		☒
122	2/14/2024	Last 3 completed evaluations for contractors	Contractor inspection		☒
123	2/14/2024	Last 3 contractor inspection checklist completed at the splitter unit			☒
124	2/14/2024	Record of coordination of emergency plan to the LEPC for last 3 years			☒



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125	2/15/2024	inspection and testing records for the SCBA, firewater monitors, firewater pumps, and deluge system for the LPG bullets for last 2 years			X
126					
127	2/15/2024	MOC and PHA for vacuum compressor update and any resulting action items w/ current status			X
128	2/15/2024	provide updated PHA dates for ISBL			X
129	2/15/2024	Any PHA records associated with the storage tank 142			X
130	2/15/2024	current status of PHA action items from 2016/2017 ISBL and OSBL revalidation PHAs			X
131	2/15/24	Dec 2023 PHA for Turn around Projects			X
132	2/15/24	OCT/NOV 2023 PHA for Pumps			X
133					
134					
135					
136					
137					
138					



DOCUMENT REVIEW/REQUEST LIST
U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VI

Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) § 103;
Emergency Planning and Community Right-to-Know Act (EPCRA) §§ 302-312; and
Clean Air Act § 112r Risk Management Program (CAA RMP)

DATE: February 12-15, 2024

FACILITY NAME: Magellan Midstream Partners, L.P.

LEAD INSPECTOR:

Amy Federoff, ERG
14555 Avion Pkwy Suite #200,
Chantilly, VA 20151

FACILITY ADDRESS:

15 Country Club Drive,
Corpus Christi, Texas 78407

The following documents were reviewed and/or requested during the inspection unless indicate otherwise. If none of the boxes in the table are checked, the document was only reviewed onsite by the inspection team.

Item No.	Document Request Date	Document Description	Reviewed Prior to Site Visit	Provided for Onsite Review	Send a Copy to EPA
139					
140					
141					
142					
143					
144					
145					
146					
147					
148					
149					
150					

INSPECTOR SIGNATURE

Amy Federoff

RECIPIENT SIGNATURE

Kelli Ridd

NAME:

Amy Federoff

NAME:

Kelli Ridd

TITLE:

inspector

DATE SIGNED:

2/15/2024

TITLE:

Sr PSM Engineer

DATE SIGNED:

2-15-24

Photolog

Facility: Magellan Midstream Partners, L.P.

Address: 15 Country Club Drive, Corpus Christi, Texas 78407

RMP ID No.: 100000234007

Inspection Date: February 12-15, 2024

Photographer: Sarah Biscardi, ERG

Original Image Storage: CD in Report file

Camera: Apple iPhone 15 Pro (Photo IDs IMG_XXXX) / Nikon CoolPix W300 (Photo IDs DSCNXXXX)

No. of Images: 34

Photo	Image ID	Description
1	IMG_0010	Overview photo of the flare and surrounding exclusion zone.
2	IMG_0011	Flare exclusion area and piping leading to the flare.
3	IMG_0012	LPG storage vessels 174, 175, 176, 177, 178, and 179 and surrounding area.
4	IMG_0013	LPG storage vessels 174, 175, 176, 177, 178, and 179 and surrounding area.
5	IMG_0014	LPG storage vessel 174.
6	IMG_0015	North side of the LPG storage vessels 174, 175, 176, 177, 178, and 179.
7	IMG_0016	Splitter Operational Area, north side.
8	IMG_0017	South side of the LPG storage vessels 174, 175, 176, 177, 178, and 179.
9	IMG_0018	Labeled propane piping from the LPG storage vessels.
10	IMG_0019	South side of the LPG storage vessels 174, 175, 176, 177, 178, and 179.
11	IMG_0020	Pre-feed heater and main feed tower within the Splitter Operational Area.
12	IMG_0021	De-propanizer (left) and de-butanizer (right) towers on the northeast end of the Splitter Operational Area.
13	IMG_0022	Fire monitor, security camera, and firewater piping on the south end of the LPG storage vessels.
14	IMG_0023	Fire hydrant and monitor on the north side of the Splitter Operational Area.
15	IMG_0024	Aqueous ammonia storage vessel on the west side of the Splitter Operational Area.
16	IMG_0025	Aqueous ammonia storage vessel on the west side of the Splitter Operational Area.
17	IMG_0026	Splitter Operational Area, southwest side.
18	IMG_0027	Splitter Operational Area, west side.
19	IMG_0028	Storage tank 142 from the west side.
20	DSCN6119	South side of the Splitter Operational Area; Heat exchangers E-3862 and E3863 A and B. Scaffolding was placed around the equipment in preparation for the Turn Around.
21	DSCN6120	Crude pre-heater heat exchangers E-3863A and B.
22	DSCN6121	Crude pre-heater heat exchanger E-3862 and associated name plate.
23	DSCN6122	Crude pre-heater heat exchanger E-3866 and associated piping.
24	DSCN6123	Name plate of heat exchanger E-3864.
25	DSCN6124	Crude pre-heater heat exchanger E-3864.
26	DSCN6125	Feed surge drum, VC-2001, and associated equipment, including water settling drum, VS-2001.
27	DSCN6126	Feed surge drum, VC-2001, and associated equipment, including water settling drum, VS-2001.
28	DSCN6127	Underside of feed surge drum, VC-2001.
29	DSCN6128	South saddle of feed surge drum, VC-2001.
30	DSCN6129	North saddle of feed surge drum, VC-2001.
31	DSCN6130	Heat exchanger E- 3863 and other piping looking south from the Splitter Operational Area.
32	DSCN6131	Heat Exchanger E-3862 and E-3866 looking south from the Splitter Operational Area.
33	DSCN6132	2020 incident location at storage tank 142.
34	DSCN6133	2020 incident location at storage tank 142.