Nold, Eric

From: Doherty, Paul
Sent: Friday, July 25, 2014 8:22 AM
To: Sieben, Brian
Cc: Nold, Eric; Larson, Kevin
Subject: Magellan St. Joseph Terminal FRP review comments clarification
Attachments: Magellan Wathena CBI and Receipt of Documents.pdf

Brian:

We've taken another look at our previous plan review comments and add the following clarifications:

- *Appendix F Section 1.3.2 of 40 CFR Part 112 – Model Facility-Specific Response Plan*, states that the FRP should provide a description of the facility's list of emergency response equipment as well as the location of the response equipment. The example shown in the regulation's model plan *Section 1.3.2 Table 8* interprets this requirement to include a list of Personnel Protective Equipment (PPE). The EPA *FRP Plan Review Checklist*, which we use, is based on the elements of the *Appendix F Model Plan* and contains a "checkbox" to indicate that PPE is addressed in the plan. The Magellan St. Joseph Terminal FRP contains references to PPE and identifies "miscellaneous safety equipment" in Table 7.1-1 but does not specifically describe what PPE is available on site or where it is located. This was the basis for our original comment. The FRP could be improved by clarifying what and where PPE is available in Table 7.1.1 – however, based on further review, EPA will not require this change as a condition of FRP approval.
- The Response Times for OSRO's listed in Table 3.1-3 should be corrected to reflect actual response times. Listing the OSRO Response Times is not a requirement but if the information is provided, it should be accurate.
- An alternative evacuation route to the rear of the facility should be considered in case the front gate can't be used. This is a suggestion for your consideration and not a requirement for approval. The location of air horn should be noted in the plan. This is recommended but not a requirement for approval.
- The plan states that the facility has not had a reportable spill to navigable waters. The March 13, 2007 date in Figure C-13, that reportedly represents some base reporting date for Magellan, should be moved to a footnote to Figure C-13 so it is not confused with a date of an actual reportable spill.
- The table *EPA Planning Volume Data* (page D-16), uses the incorrect spill location designation, i.e. "Nearshore/Inland/Great Lakes". The correct designation should be 'Rivers and Canals". The Planning Volumes should be recalculated using the proper location designation and corresponding distribution percentages, i.e. 80-10-10.
- Disregard the previous comment regarding the facility's storage capacity for recovered material for the medium quantity discharge. The information provided in the plan is adequate.

In addition to the above comments, please provide copies of the most recent Personnel Response Training Log, a QI Notification Drill Log, and an SMT Tabletop Exercise Log.

Please sign and return the attached Receipt of Documents Form and the CBI Form at your earliest convenience.

Any question, feel free to call me at 913-551-7924.