Nold, Eric

From: Doherty, Paul
Sent: Monday, August 18, 2014 9:24 AM
To: Sieben, Brian
Cc: Nold, Eric; Larson, Kevin
Subject: RE: Magellan St. Joseph Terminal FRP review comments clarification

Brian:

We need to move ahead and finalize the plan review and inspection checklists for the Magellan St. Joseph Terminal. The following 2 items are still outstanding:

- 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. The table we were provided on 7/28/14 indicates it is for the Kansas City terminal and has calculations based on an incorrect WCD for the St. Joseph Terminal (uses 406,116 bbls and should be 55,283 bbls). Still await corrected table.
- Please provide copies of the most recent Personnel Response Training Log.

Other comments to consider but are not considered deficiencies that must be addressed prior to FRP approval:

- 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, EPA will not require this change as a condition of FRP approval. Let me know if we can expect any revisions to address this comment.
- 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. Let me know if we can expect any revisions to address this issue.

We'd like to set the end of the month as the deadline for receiving the requested information. Any information not received will be noted as deficiencies and we will deal with reviewing revision at a letter date when received.

Any questions let me know. Thanks

ped