UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

October 27, 2016

MEMORANDUM

SUBJECT: Air Compliance Inspection of Magellan Terminals Holdings, L.P., and BP Products North America, Inc., located in Atlanta, Georgia.

FROM: Kevin I. Taylor, Environmental Engineer 10/27/2016
South Air Enforcement & Toxics Section

Nicole Radford, Environmental Scientist
North Air Enforcement & Toxics Section

TO: Todd Russo, Chief
South Air Enforcement & Toxics Section

Dick DuBose, Chief
North Air Enforcement & Toxics Section

Attached is the Quality Assurance Project Plan (QAPP) for the Air Compliance inspection that will be conducted at Magellan Terminals Holdings, L.P., and BP Products North America, Inc., located in Atlanta, Georgia Magellan Terminals Holdings, L.P., and BP Products North America, Inc., located in Atlanta, Georgia, on Thursday, October 27, 2016.

I. PROJECT INFORMATION

1. PROJECT LOCATIONS

Magellan Terminals Holdings, L.P.
2970 Parrott Avenue
Atlanta, Georgia 30318

BP Products North America, Inc.
Atlanta Terminal
3132 Parrott Avenue
Atlanta, Georgia 30318

2. DISTRIBUTION

A copy of this QAPP is distributed to the following list below:

Internet Address (URL) • http://www.epa.gov
Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 30% Postconsumer)

Todd Russo, Chief, South Air Enforcement & Toxics Section
Dick DuBose, Chief, North Air Enforcement & Toxics Section
Nicole Radford, Environmental Scientist, North Air Enforcement & Toxics Section

3. OBJECTIVES AND BACKGROUND

To inspect the facilities vapor recovery and/or control system using the FLIR camera and the Toxic Vapor Analyzer to determine if there are any air compliance concerns with excess emissions.

4. PROJECT DESCRIPTION

To conduct an inspection of the two facilities to determine if the storage tanks present at the facility are being properly controlled and maintained to minimize any excess emissions during its operation.

5. FIELD STUDY DATES

October 27, 2016

II. DATA GENERATION AND ACQUISITION

1. INSTRUMENT/EQUIPMENT CALIBRATION

FLIR GS360 Camera
Toxic Vapor Analyzer (TVA) 2020

2. DATA MANAGEMENT

Any data gathered from the field will be stored in the official air compliance source file.

III. HEALTH AND SAFETY PLAN

Project No. 1 Title: Magellan Terminals Holdings, L.P.

Location: 2970 Parrott Avenue
Atlanta, Georgia 30318

Project No. 2 Title: BP Products North America, Inc.

Location: Atlanta Terminal
3132 Parrott Avenue
Atlanta, Georgia 30318

Description of
Field Activities: Partial Compliance Evaluation

Date of Field Activity: October 27, 2016

Field Personnel: Kevin I. Taylor, Environmental Engineer
South Air Enforcement & Toxics Section

Nicole Radford, Environmental Scientist
North Air Enforcement & Toxics Section

Hospital: WellStar Windy Hill Hospital
2540 Windy Hill Road
Marietta, GA 30067
770-644-1000

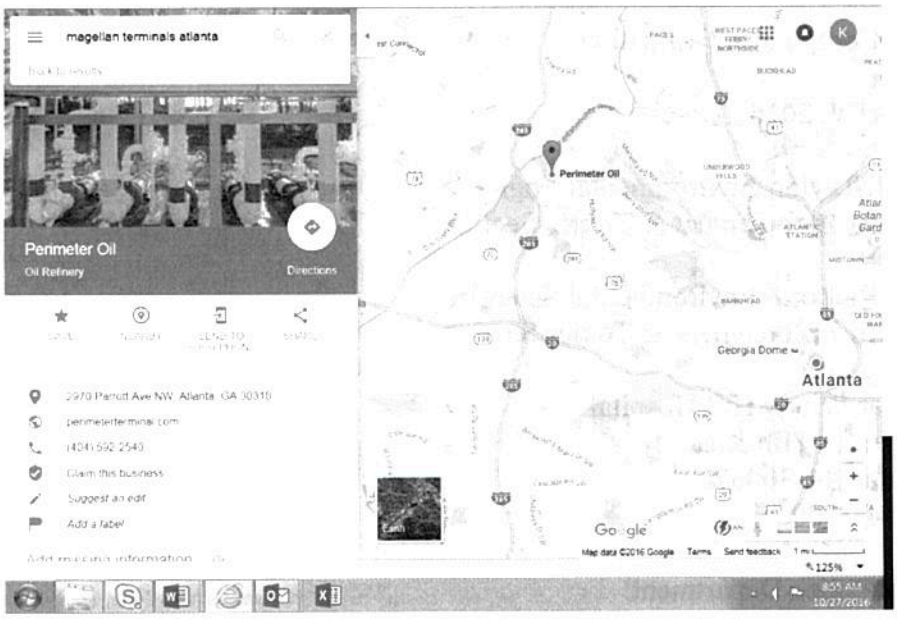
Police Department: Atlanta Police Department
3201 Martin L King Jr Drive, SW, Atlanta, GA 30311

Fire Department: Atlanta Fire Rescue Station 38
2911 Donald Lee Hollowell Pkwy NW, Atlanta, GA 30318

Emergency Number: 911

Tasks and Hazards:

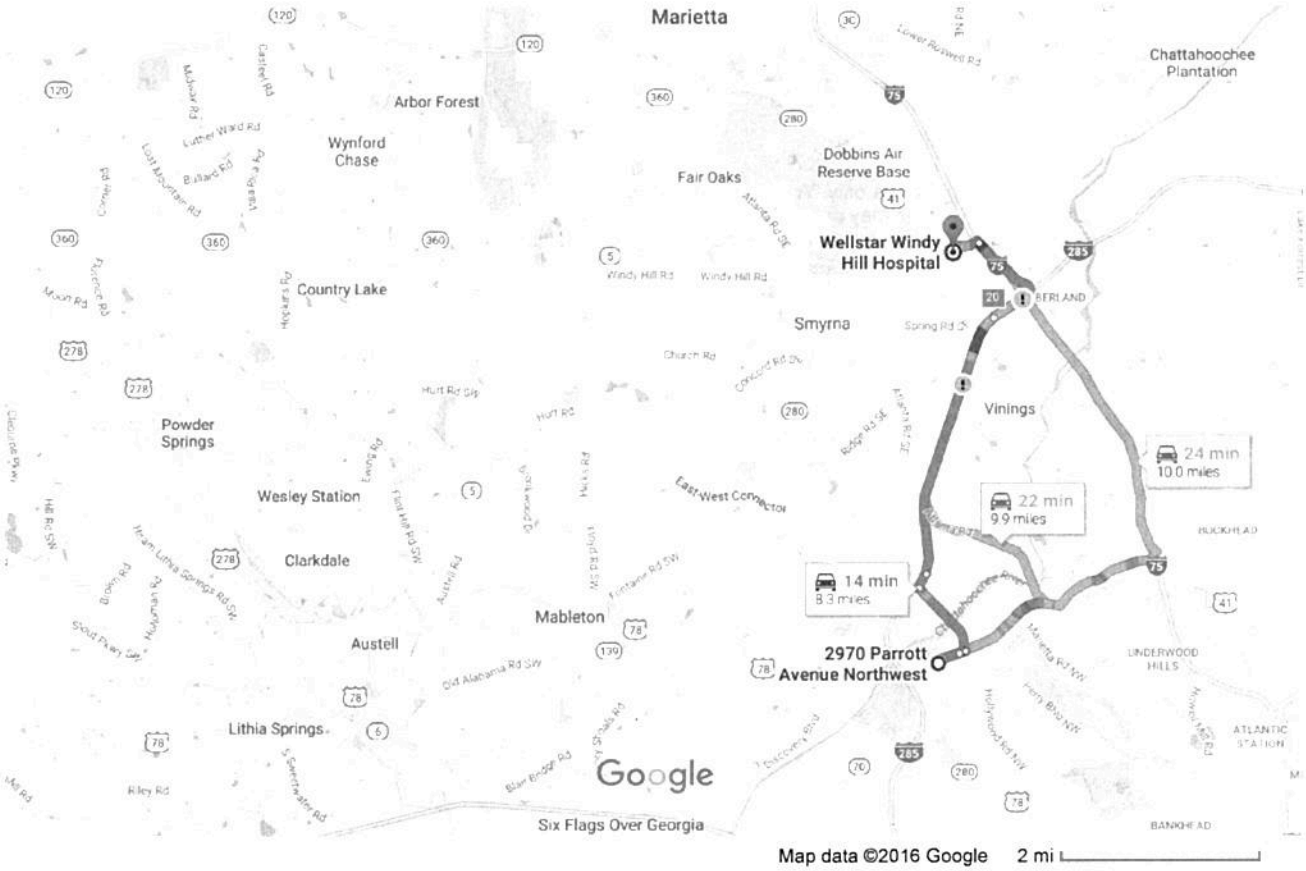
Task	**Hazard**	**Protection and Control Measures**
Inspection	General Safety	Level D PPE – Hard Hat, Steel Toe Boots/safety boots, Safety Glasses, Ear plugs; and any facility-specific PPE – such as face mask with air filter for VOCs may be required.


magellan terminals atlanta
Back to results
Perimeter Oil
Oil Refinery
Directions
2970 Parrott Ave NW, Atlanta, GA 30318
perimeterterminal.com
(404) 592-2540
Claim this business
Suggest an edit
Add a label
Add missing information
Perimeter Oil
Georgia Dome
Atlanta
Google
Map data ©2016 Google
Terms
Send feedback
125%
8:55 AM
10/27/2016

Google Maps

2970 Parrott Avenue Northwest, Atlanta, GA to Wellstar Windy Hill Hospital

Drive 8.3 miles, 14 min



2970 Parrott Avenue Northwest

Atlanta, GA 30318

1. Head east on Parrott Ave NW toward Whittier Ave NW — 0.4 mi
2. Turn left onto Bolton Rd NW — 479 ft
3. Turn left onto GA-280 N/James Jackson Pkwy NW
   Continue to follow GA-280 N — 1.2 mi
4. Turn right onto the I-285 N ramp — 0.3 mi
5. Merge onto I-285 — 4.2 mi
6. Use the right 2 lanes to take exit 20 for I-75 N — 1.8 mi

7. Use the left 2 lanes to turn left onto Windy Hill Rd SE

0.4 mi

Wellstar Windy Hill Hospital

2540 Windy Hill Road Southeast, Marietta, GA 30067

These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.

JOB HAZARD ANALYSIS

Hazard Types (HT)

1. Toxic Chemicals
2. Flammable Chemicals
3. Corrosive Chemicals
4. Environmental
5. Explosion (Chemical Reaction)
6. Explosion (Over pressurization)
7. Mechanical/Vibration
8. Electrical (Shock, Short Circuit)
9. Electrical (Fire)
10. Electrical (Static, ESD)
11. Electrical (Loss of Power)
12. Ergonomic (Overexertion)
13. Ergonomic (Human Error)
14. Vibration
15. Fall (Slips/Trips)
16 Fall (To a Different Level)
17. Excavation (Collapse)
18. Fire, Heat, Thermal, Cold
19. Noise
20. Radiation (Ionizing/Non-Ionizing)
21. Visibility
22. Weather
23. Caught (In, On, Between)
24. Struck (By, Against)
25. Driving
26. Confined Space
27. Other

Job Task: **Oil & Gas Underground Injection Control (UIC) Site Visits/Compliance Inspections**

Job Frequency/Duration: once/year; 3 -4 days

Tools Used:
Camera
Echo Meter
Explosivity Meter
Salinity Meter
Pressure gauges

Chemicals Used:
None

CRITICAL TO SAFETY (CTS)

Risk Estimation Matrix

Probability of Occurrence of Harm	SEVERITY OF HARM			
	Catastrophic	Serious	Moderate	Minor
VERY LIKELY	Extreme	High	High	Medium
LIKELY	High	High	Medium	Low
UNLIKELY	Medium	Medium	Low	Negligible
REMOTE	Low	Low	Negligible	Negligible

* High = CTS tasks should receive engineering controls prior to assigning administrative or PPE controls.

Job Description: Responsible for oversight of and technical assistance to States in their implementation of delegated UIC programs to protect ground water from contamination. Personnel directly administer the Federal UIC permitting program with jurisdiction over approximately 2,300 Class II wells (those associated with oil/gas production) sited on Tribal Lands in the Region.

Step #	Procedures (LOP Procedure Step)	Potential Hazards	HT	Check CTS	Recommended Safe Practice	PPE
1	Schedule site visit	None	NA	NA	NA	NA
2	Orgainze personnel/equipment/supplies; Deploy to location either by car or airplane.	Ergonomics, Driving, Weather	13, 21, 22, 24, 25	Medium	Careful lifting techniques, secure grip, packing at desk level or higher; Drive defensivly; do not text while driving;	None
3	Perform Site Visit/Compliance Inspection at oil & gas site: Personnel attend a Site Safety & Health Briefing, if required, prior to entry. Personnel inspect tanks and valves at well heads. In addition, fluid levels using the echo meter, mechanical integrity tests and pressure readings are taken to ensure compliance with permit requirements. Personnel may also observe the tank battery system and note deficiencies to forward to 6EN	Insects, chemicals, thermal/cold stress, noise, slips/trips/falls	1-6, 15, 18, 19, 22	Medium	Reference table below and PPE Hazard Assessment Form	
4	If applicable, drive to next oil & gas facility and repeat step 3 above. If not, proceed to step 5.	Reference Step 3				
5	At completion of visit, return to Regional Office and draft required letters/reports.	Driving, Weather	21, 22, 24, 25	Medium	Drive defensivly; do not text while driving;	None

HAZARDS –NOTE ALL POTENTIAL HAZARDS ASSOCIATED WITH THE JOB (CHECK ALL THAT APPLY)

Physical						
General	☒	thermal stress	☒	cold	☒	noise
	☒	explosion	☒	fire	☒	weather
	☐	fatigue	☐	violence	☒	illness/injury
Radiation	☒	ionizing	☐	microwave	☐	light
Vehicles	☒	traffic	☐	heavy equip	☐	forklift
	☐	helicopter	☐	small aircraft	☐	boat
Boat Ops	☐	sediment sampling	☐	rapid water	☐	open water
	☐	diving	☐	electrofish		
Industrial	☒	comp gas	☐	electricity	☐	confined space
	☒	equip	☐	moving parts		
Overhead	☐	obstruction	☒	falling objects		
Elevation	☐	roof	☐	scaffold	☐	ladder
	☐	stairs	☐	catwalk		
Slips/trips	☒	terrain	☒	debris	☒	slippery
	☒	trench	☒	pits/holes		
Other physical hazards:			☐			

Biological						
Agriculture	☐	CAFO	☐	fish	☐	farm animals
Animals	☐	dogs	☐	feral animals	☒	snakes
Insects	☒	spiders	☒	mosquitoes	☒	wasp/hornet
	☒	bees				
Pathogens	☐	bloodborne	☐	sewage	☐	med/lab
Other Biological:	☐					

Chemical						
Containers	☐	ammonia	☐	chlorine	☐	other
VOCs	☒	solvents	☒	fuel	☒	oils
Wastes	☐	sewer	☐	landfill	☒	smoke/dust/fume
	☐	metals	☐	PCBs	☐	paints/surfacing
Particulates	☐	fibers	☐	diesel	☐	asbestos
Sampling	☐	acids	☐	bases		
Other Chemicals:	☐					

PERSONAL PROTECTIVE EQUIPMENT (PPE) REQUIRED (CHECK ALL THAT APPLY)

Feet:	☐	safety boots	☒	steel-toe boots	☐	shank
	☐	rubber boots	☐	waders		
Gloves:	☒	leather	☐	cotton	☐	cut-resistant
	☐	chemical resist	☐	disposable		
Body:	☐	safety vest	☐	pfd	☐	harness
	☐	tyvek	☐	sarnex-tyvek	☒	coveralls
Eyes:	☒	safety glasses	☒	sunglasses	☐	goggles
Head:	☒	hard hat	☒	hearing protection	☐	respirator

OTHER REQUIRED SAFETY EQUIPMENT/CONSIDERATIONS

☒	dosimetry	☐	communication	☐	decon
☐	first aid kit	☐	fire extinguish	☐	flares
☐	chains/studs	☐	eye wash/shower		

☐	24 hr HAZWOPER	☐	40 hr HAZWOPER	☐	HAZWOPER Annual Refresher
☒	TLD Program	☐	RPP Program	☒	Medical Surveillance
☐	1st Aid/CPR	☒	Other: 1) 24hr EPA Safety & Health Training; 2) Annual EPA H&S Refresher Training (Vehicle Safety & Radiation Safety modules are required)		

COMMENTS:

Personnel may be potentially exposed to various chemicals while inspecting tank battery systems and wellheads. Chemicals primarily include fuels and oils. Personnel are routinely exposed to hazardous noise; however, exact sound levels are not known at this time. Further analysis is required. Personnel are required to wear ear plugs and/or muffs while working around hazardous noise sources. Sources of hazardous noise include compressors and various industrial equipment. Employees engage in field activities during all types of weather conditions, to include extreme heats. Thermal stress is a viable hazard; therefore personnel must ensure adequate hydration and appropriate field gear is worn while engaging in field activities. In addition, field acitivies are conducted on various terrain and in remote locations where pits, holes, and trenches are encountered. Personnel need to be cognizant of their surroundings and take evasive actions to avoid contact with such hazards. Due to the nature of industrial facilities, potential fire and or/ explosions hazards are probable. Personnel are required to wear Nomex coveralls during site entry procedures. Personnel also follow site-specific safety and emergency response procedures if the situation dictates. In addition, personnel are always accompanied by site personnel. Personnel may encounter ionizing radiation (i.e. uranium series or isotopes), above background levels, while at industrial facilities; however, the radioactive sources are properly shielded and personnel do not come in direct contact with radioactive materials. Personal exposure monitoring, through the TLD program is required. REFERENCE PPE HAZARD ASSESSMENT FORM FOR SPECIFIC EXPLANATION OF HAZARDS ASSOCIATED WITH THIS JOB HAZARD ANALYSIS.

CERTIFICATION OF HAZARD ASSESSMENT

SUPERVISOR:	SAFETY/HEALTH REPRESENTATIVE:
DATE:	DATE:

Required Personal Protective Equipment			
Where engineering and administrative controls are not feasible or sufficient for controlling hazards, PPE must be used to protect workers. The following PPE are required for the noted tasks above:			
Eye and Face Protection			
X	Safety glasses with side shields		Reflective goggles/face shield
	Chemical splash goggles		Cutting/brazing/welding eye protection
	Face shield	X	Other: Sunglasses
Head Protection			
X	Hard hat, bump cap		Helmet, cowl, hood
	Welding helmet/mask		Other:
Foot Protection			
X	Safety shoes/boots		Other:
	Chemical-resistant boots		
Body Protection			
	Apron (splash, work)		Head-reflective garments
	Lab coat	X	Sleeves (cut-resistant)
X	Coveralls (work, chemical-resistant) Hazard Type: Fire Type coverall: Nomex		Other:
Respiratory Protection			
	Respirator (situational dependant)		Type of respirator:
Hand Protection			
	Rubber insulating gloves		Rubber insulating sleeves
	Rubber insulating hoods	X	Other: Leather Gloves
Other: Ear plugs and/or muffs Sunscreen Insect repellent			

PPE Hazard Assessment Form

HEALTH AND SAFETY HAZARDS		
Chemical Hazards		
X	Vapors/gases	Personnel may be potentially exposed to various chemicals while inspecting tank battery systems and wellheads. Chemicals primarily include fuels and oils.
	Dusts/mists/fumes	
	Liquid splash	
Comments:	Depending upon the facilities H&S requirements, personnel may be required to wear temporary sleeves. Usually this personal protective equipment is provided by the facility; however, personnel should have the minimum PPE on hand.	
Physical Hazards		
	Impact — flying dust, particles, chips	
	Penetration/punctures	
X	Ergonomics	Personnel may experience repetitive motions, frequent or heavy lifting, pushing, pulling, or carrying of heavy objects; and prolonged awkward postures. Vibration and cold may add risk to these work conditions. The level of risk depends on the intensity, frequency, and duration of the exposure to these conditions. Careful lifting techniques along with secure grips and packing at desk level or higher will reduce potential exposures.
X	Heat — sparks, molten splash, high temperatures	Employees engage in field activities during all types of weather conditions, to include extreme heats. Thermal stress is a viable hazard; therefore personnel must ensure adequate hydration and appropriate field gear is worn while engaging in field activities.
X	Cold — cryogens, cold temperatures	Employees engage in field activities during all types of weather conditions, to include cold weather. Although field activities are performed in termperate climates, cold weather may be a potential hazard. Appropriate field gear must be worn.
X	Fire/Explosion	Due to the nature of industrial facilities, potential fire and or/ explosions hazards are probable. Personnel may be required to wear Nomex coveralls during site entry procedures. Personnel also follow site-specific safety and emergency response procedures if the situation dictates. In addition, personnel are always accompanied by site personnel.
X	Radiation — ionizing, non-ionizing	Personnel may encounter ionizing radiation (i.e. uranium series or isotopes), above background levels, while at industrial facilities; however, the radioactive sources are properly shielded and personnel do not come in direct contact with radioactive materials. Personal exposure monitoring, through the TLD program and Radiation Safety Training is required.
X	Noise	Personnel are routinely exposed to hazardous noise; however, exact sound levels are not known at this time. Further analysis is required. Personnel are required to wear ear plugs and/or muffs while working around hazardous noise sources. Sources of hazardous noise include compressors and various industrial equipment.
X	Slips/Trips/Falls	Slips/trips/falls are always likely when walking walking through oil & gas production areas. In addition, many of the field acitivies are conducted outside where pits, holes, and various terrains are encountered. Personnel need to be cognisant of their surroundings and take evasive actions to avoid contact with such hazards.
	Elevation - Falls	
X	Other	Vehicular accidents and traffic are potential hazards encountered while driving to and from sites. Defensive driving training is required to ensure safe travel of employees.
Comments:		
Biological Hazards		
	Bloodborne pathogens	
X	Animals/Insects	Employees may encounter a variety of insects and snakes while in the field. These include snakes, mosquitos, bees, wasps, spiders, ticks etc. Personnel need to be cognizant of their surroundings and take evasive actions to avoid contact with such animals/insects.
	Other	
Comments:		

Completed by:
SHEMP Review_____ **Date:**_____