

Marathon Petroleum Company - Galveston Bay Refinery	Floating Roof Tank Seal Inspection, Repair and Reporting		
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1.0 Purpose

The purpose of this policy is to define how we comply with federal and state environmental laws regulating storage tank floating roof seal inspection, including repair, and reporting. The Texas Commission on Environmental Quality (TCEQ) and the EPA have authority over this program.

2.0 Scope

This policy applies to all floating roof storage tanks located within the Galveston Bay Refinery and Refinery Docks.

3.0 Procedure

3.1 Roles and Responsibilities

3.1.1 Tank Inspection Specialist

3.1.1.1 Coordinate and ensure that appropriate tank owners, Crude Scheduler, Refinery Operations Planners, Tank Group Team Leader, Environmental Advisor-Tanks, and Inspection Department personnel are kept informed of storage tank floating roof seal inspection and repair due dates.

3.1.1.2 Update and maintain the Tank Inspection Due Date Schedule and the Tank Inspection Tracking Spreadsheet on the Inspection Department SharePoint.

3.1.1.3 Ensure that inspections are performed in accordance with TCR -SIP-P 21 entitled "Floating Roof Seal and Deck Fitting Inspection".

3.1.1.4 Ensure that inspection records are stored in the PCMS database and maintained for the life of the storage tank

3.1.2 Environmental Advisor-Tanks

3.1.2.1 Ensure that tank owners, Inspection Department personnel, and other involved personnel are aware of regulatory requirements for floating roof tank inspection, repair, and reporting, and that, TCR -SIP-P 21 entitled "Floating Roof Seal and Deck Fitting Inspection" procedure meets those requirements.

3.1.2.2 Keep regulatory agencies informed as required regarding floating roof tank seal inspection and repair.

3.1.2.3 Coordinate review of tank seal repair due date extension requests with MPC Legal counsel and tank owners.

3.1.2.4 Ensure related regulatory training material is maintained.

3.1.2.5 Inform Learning and Development Department of new employee and refresher training needs for team members.

3.1.3 Tank Owner (Area Team Leader or designee)

3.1.3.1 Ensure that all floating roof tanks are inspected and repaired by the due date, and that no Title V deviation is incurred for exceeding a due date.

3.1.3.2 Ensure that needed repairs are planned, so that repair date extension requests are not necessary. Note: all floating roof seal repair date extension requests are public records.

3.1.3.3 Keep Tank Inspection Specialist updated as needed.

3.1.4 Crude Scheduler and Refinery Operations Planners

3.1.4.1 Work with tank owners to identify optimal windows when storage tanks can be made static for inspection and repair prior to due date.

3.2 Inspection Due Date Notification

At least forty-five (45) days prior to the inspection due date, the Tank Inspection Specialist shall update and issue the Tank Inspection Due Date Schedule to affected tank owners, Crude Scheduler, Refinery Operations Planners, Tank Group Team Leader, Environmental Advisor-Tanks, and Inspection Department personnel.

3.3 Agency Notification of Inspection

The Environmental Advisor-Tanks reviews the inspection schedule and;

3.3.1 Identify applicable rules for requirements

3.3.2 Prepare a draft notification letter to the regulatory agency

3.3.3 Submit the draft letter to Environmental QA/QC for approval

3.3.4 Mail notification letter to TCEQ with a cc to USEPA via certified mail at least 30 days prior to the scheduled inspection date.

3.4 Floating Roof Inspection Planning & Scheduling

Upon receiving the inspection due date schedule, the tank owner or Asset Coordinator shall:

3.4.1 Review the due date list with the Crude Scheduler or Refinery Operations Planner to identify windows of opportunity to inspect tanks.

3.4.2 Schedule tanks to be inspected and coordinate with Operations and Inspection Department.

3.4.3 Work closely with the Crude Scheduler or refinery Operations Planner to make tanks static for physical inspection.

3.4.4 Coordinate the tank inspection date with the Inspection Department.

3.5 Floating Roof Repair

3.5.1 For defects that can be immediately repaired while the tank is still static, the Asset Coordinator shall ensure repairs are made and the Inspection Department shall ensure the tank is re-inspected before returning the tank to service. Upon completion, the Tank Inspection Specialist shall update the Inspection Tracking Spreadsheet with the actual completion date.

3.5.2 For repair of defects that are more extensive, the Asset Coordinator and the Tank Group Team Leader shall ensure repairs are made within forty-five (45) days. They shall:

3.5.2.1 Work closely with Crude Scheduler or Refinery Operations Planner, Operations, and Inspection to schedule a new repair date window, so that repairs and re-inspection are completed within 45 days from when the defect was first found.

3.5.2.2 Inform the Tank Inspection Specialist and ensure the Inspection Tracking Spreadsheet is updated with the new scheduled repair completion date.

3.6 Requests for Repair Date Extension

The regulations allow the agency to grant requests for repair dates to be extended beyond the initial 45 days. In granting such a request, the agency takes into consideration that plant management has had a year to plan and prepare the tank for inspection and possible repairs. MPC strongly discourages requests for seal repair date extensions unless there is a legitimate safety issue, or extenuating circumstance. A Floating Roof Repair Extension Request Form must be obtained from the Environmental Advisor-Tanks and filled out and signed by the Tank Owner and submitted to the Environmental Advisor-Tanks for review and approval with

legal counsel at least two weeks before the due date. Upon approval, the Environmental Advisor-Tanks will submit the request to the agency. Note: all seal repair date extension requests are public documents and are made readily available to the public by the agency.

3.7 Competencies and Training

3.7.1 All personnel affected by this procedure shall complete training on their responsibilities when they are initially assigned to their role, and shall complete refresher training on their role once every three years, or upon any changes to this procedure.

3.7.2 The Environmental Advisor - Tanks (EA) will conduct and document initial face-to-face training. Refresher training will be provided through VTA system. All training records will be maintained in VTA. The EA is responsible for keeping Learning & Development apprised of the names of affected personnel and their training needs. The EA is also responsible for assuring that training materials are maintained up-to-date.

3.8 Assurance

3.8.1 Inspection Department

Ensure that the QA/QC requirements of TCR Floating Roof Inspection Procedure, SIP 21 are fulfilled.

3.8.2 Environmental

3.8.2.1 The Environmental Advisor (EA) shall ensure that all of the requirements of this procedure are audited at least annually from the date of issue, or date of revision. Corrective actions necessary to assure sustainable compliance shall be documented, implemented, and the effectiveness of the corrective action shall be assessed by the EA as part of the annual audit.

3.8.2.2 The Environmental Advisor shall determine if and when the floating roof tank scheduling, inspection, and repair team should meet to review past performance and future plans. Typically, the team should meet annually, in January, to review:

3.8.2.2.1 Past performance against schedule

3.8.2.2.2 Root cause and corrective actions related to Title V deviations

3.8.2.2.3 Audit results

3.8.2.2.4 Corrective and preventative corrective actions implemented to assure sustainability of compliance

3.8.2.2.5 Personnel changes

3.8.2.2.6 Training status

3.8.2.2.7 Future tank inspection schedule and any potential threats to meeting schedule.

3.8.2.3 The Environmental Advisor - Tanks (EA) shall maintain two tasks in Compliance Task Manager to ensure that 1) the annual audit of this procedure is performed; and 2) that during the month of November, the EA reviews and considers the need for a team meeting to review past performance and path forward sometime during the following two months.

3.9 Documentation

3.9.1 Training records - VTA

3.9.2 Tank Seal Inspection Reports - PCMS Database

- 3.9.3 Tank Inspection Due Date Schedule - Inspection Department TeamView
- 3.9.4 Tank Inspection Tracking Spreadsheet - Inspection Department TeamView
- 3.9.5 Tank Seal Repair Extension Request (from Tank Owner to EA)
- 3.9.6 Advance Notification to Agency of Tank Seal Inspection Schedule (from EA to Agency)
- 3.9.7 Repair Extension Request to Agency (from EA to Agency)
- 3.9.8 Compliance Tasks – Compliance task tracking system
- 3.9.9 Annual Audit - Compliance task tracking system
- 3.9.10 Team meeting minutes - Open Text

4.0 Definitions

- 4.1 EA – Environmental Advisor - Tanks
- 4.2 CFR - Code of Federal Regulations
- 4.3 PCMS - Plant Condition Monitoring System
- 4.4 SIP - Site Inspection Procedure
- 4.5 TAC – Texas Administrative Code
- 4.6 TCEQ – Texas Commission on Environmental Quality
- 4.7 USEPA – United States Environmental Protection Agency

5.0 References

- 5.1 TCR -SIP-P 21 entitled “Floating Roof Seal and Deck Fitting Inspection”
- 5.2 40 CFR 60, Subpart K, Ka, &Kb
- 5.3 40 CFR 61, Subpart Y
- 5.4 40 CFR 63, Subpart F
- 5.5 40 CFR 63, Subpart CC
- 5.6 TAC Title 30, Part I, Chapter 115 Subchapter B, Division 1
- 5.7 MPC GBR Floating Roof Tank Seal inspection Scheduling, Repair, and Reporting Work Flow
- 5.8 MPC GBR Floating Roof Storage Tank List
- 5.9 MPC GBR Floating Roof Repair Extension Request Form

6.0 Attachments

None

7.0 Revision History

Revision Number	Description of Change	Written by	Approved by	Revision Date	Effective Date
0	Original issue.	M. T. Garvin	J. H. Brinly	18-Oct-00	18-Oct-00
1	Updated to per Floating Roof Tank Seal Inspection, Repair, and Reporting MOC (M2011841-001).	M. K. Alberts	M. J. Berlinger	23-Apr-12	23-Apr-12
2	Reviewed by Environmental SME. Re-formatted as GBR document and updated titles	G. L. Long	B. Contractor	dd-mmm-yy	dd-mmm-yy



**MPC Galveston Bay Refinery
Environmental Management System Procedure Manual
Attachment**

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FLOATING ROOF REPAIR EXTENSION REQUEST FORM

Tank ID: _____ Material Stored: _____

Initial Inspection Date: _____

Repair Due Date (Add 45 days to the Initial Inspection Date from above): _____

Extended Repair Due Date (Add 30 days to Repair Due Date from above): _____

Type of inspection (Physical Primary or Secondary Seal, Visual Tank Top): _____

Description of inspection failure:

Documentation that alternate storage capacity is not available:

Specify a schedule of actions that will ensure the control equipment will be repaired or the vessel will be emptied as soon as practicable (within 75 days from the date of initial inspection):

The Area Team Leader must approve and sign this request form:

_____ Date: _____

(Area Team Leader)