

Authored By: Glenn Long	Blanchard Refining Company LLC Galveston Bay Refinery ENV-07 Floating Roof Tank Seal Inspection, Repair and Reporting	Doc No.: REW-000003-GB Rev No: 0
Doc Custodian: Environmental Supervisor		Refinery Environmental Work Procedure
Approved By: Eric Kaysen		
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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 SME, 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 GBR-SIP-P 20 entitled "Inspection of Atmospheric Storage Tank".
- 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 SME-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 20 entitled "Inspection of Atmospheric Storage Tank" 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.

3.1.3 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

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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 SME, and Inspection Department personnel.

3.3 Agency Notification of Inspection

The Environmental SME 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 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 inform the Environmental SME 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 SME and filled out and signed by the Tank Owner and

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submitted to the Environmental SME for review and approval with legal counsel at least two weeks before the due date. Upon approval, the Environmental SME 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.

3.8 Assurance

3.8.1 Inspection Department

Ensure that the QA/QC requirements of TCR Floating Roof Inspection Procedure, SIP 20 are fulfilled.

3.8.2 Environmental

- 3.8.2.1 The SME 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 SME as part of the annual audit.
- 3.8.2.2 The SME 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.

3.9 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 Seal Repair Extension Request (from Tank Owner to SME)
- 3.9.5 Advance Notification to Agency of Tank Seal Inspection Schedule (from SME to Agency)
- 3.9.6 Repair Extension Request to Agency (from SME to Agency)
- 3.9.7 Compliance Tasks – Intelex

4.0 **Definitions**

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- 4.1 **SME** – Subject Matter Expert- 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 20 entitled “Inspection of Atmospheric Storage Tank”
- 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

- 6.1 [ENV-07A Floating Roof Tank Repair Extension Request](#)
- 6.2 [ENV-07B Floating Roof Tank Landing-Floating](#)
- 6.3 ENV-07C ENV Notification Tank Service Change/Landing/Mechanical Failure (SSM) [<insert link>](#)

7.0 Revision History

Revision Number	Description of Change	Written by	Approved by	Revision Date	Effective Date
0	Original Issue. New integrated site procedure replaces GBR-HESS-ENV-07 and REW-N001-TANK-TC, REW-N002-TANK-TC and REW-N003-TANK-TC under MOC 93391.	G. L. Long	E. R. Kaysen	7/26/2021	8/20/2021

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Title: ENV-07A Floating Roof Tank Repair Extension Request	Doc Number: REW-FORM-000001-GB	Rev No: 0

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)

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Tank Roof Landing/Floating Form

This form is used to document changes in tank status. Complete the appropriate section of this form and notify Environmental each time a roof has been landed or refloated.

Note: If re-floating the roof will take more than 24 hours once you've stopped pulling product out, a TO must be in place prior to landing the roof.

Fill out every line below. If an item does not apply write "Not applicable" or "NA"

Tank Number: _____

Tank Location (circle one): East/West Plant or Bay Plant

Material in the tank before change (or empty): _____

Material in the tank after change (or empty): _____

Event	Date	Time
Roof landed		
Liquid removed from tank (pump suction lost)		
Filling started		
Roof floated		

Was the Roof Refloating continuous? Yes or No

Was a Thermal Oxidizer used? Yes or No

If yes, T.O. Company: _____

Tank TAR? Yes or No

Change of Service? Yes or No

Other? _____

Shift Foreman/Supervisor: _____ **Date:** _____

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