



REGION 1

BOSTON, MA 02109

Clean Air Act Inspection Report

Report Date: June 13, 2025

I. Background

Inspection Date: May 29, 2025

Inspection Type: Partial Compliance Evaluation

EPA Inspector: Grace Perry, Enforcement and Compliance Assurance Division, Air Compliance Section

GRACE PERRY

Digitally signed by GRACE PERRY
Date: 2025.06.13 13:08:03 -04'00'

EPA Reviewer: John Melcher, Senior Enforcement Coordinator, Air Compliance Section

JOHN MELCHER

Digitally signed by JOHN MELCHER
Date: 2025.06.13 14:01:34 -04'00'

Facility Name: Shell Oil Products US – Providence Terminal

ICIS Air ID#: RI0000004400700001

Facility Location: 520 Allens Avenue, Providence, RI 02905

Mailing Address: 520 Allens Avenue, Providence, RI 02905

Disclaimer:

Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

Small Business Resources Information Sheet:

Without making a determination that the subject business or organization is a small business, EPA is providing this Small Business Resource Information Sheet regarding information that may assist small

businesses in identifying and complying with environmental requirements:

<https://www.epa.gov/sites/default/files/2017-06/documents/smallbusinessinfo.pdf>

Inspection Attendees:

Name	Title	Organization
Grace Perry	Environmental Engineer	EPA R1
Dana Donovan	Life Scientist	EPA R1
Tyler Kotsifas	Physical Scientist	EPA R1
Brianna Giglietti	Air Quality Specialist III	RIDEM
Ailill Smith	Air Quality Specialist I	RIDEM
Michael Sullivan	Facilities Manager	Shell Oil Products US
Theresa Geijer	Environmental Specialist	Shell Oil Products US
David Martinez	Terminal Manager	Shell Oil Products US

Facility/Process Description:

Shell Oil Products (“Shell”) owns and operates a bulk fuel storage facility, located at 520 Allens Ave, Providence, RI 02905 (the “Facility”). The Facility began operation in 1907. The Facility receives fuel products by ship, barge, and railcar, which are stored in 25 storage tanks that can store approximately 1.5 million barrels of fuel. The storage tanks contain two grades of gasoline, fuel-grade ethanol, diesel fuel, and jet fuel. The products are blended at the Facility and then dispensed to tanker trucks. The facility operates 24 hours a day, seven days a week, and has 11 employees working on site.

A detailed facility compliance report can be found in EPA’s “Enforcement and Compliance History Online” database at the following link:

<https://echo.epa.gov/detailed-facility-report?fid=110000312894>

Potentially Applicable Federal Air Regulations:

The following federal air regulations may be applicable to the Facility:

- 40 CFR Part 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals
- 40 CFR Part 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction or Modification Commenced After July 23, 1984
- 40 CFR Part 63, Subpart R, National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)

State Air Permit:

FINAL PERMIT NO. RI-24-19 (R1)

Previous Enforcement Actions:

There have been no Clean Air Act Enforcement actions in the past five years.

II. Inspection

The Title V inspection was announced to the facility prior to the inspection by RIDEM. RIDEM representative Brianna Giglietti communicated to the facility that EPA representatives would also be in attendance on May 16, 2025.

The EPA inspectors Grace Perry, Dana Donovan, and Tyler Kotsifas, and RIDEM inspectors Brianna Giglietti and Ailill Smith arrived at the facility on May 29, 2025, at 8:58 A.M.

A. Opening Conference:

At 9:00 A.M. the inspectors were greeted by Michael Sullivan, Facilities Manager. The inspectors signed in and presented their credentials. The group proceeded to a conference room where they met Theresa Geijer and David Martinez.

Mr. Martinez began with a site safety briefing and told the inspectors that the facility began offloading a shipload of gasoline into Tank 7521 prior to the inspectors' arrival that morning.

Mr. Sullivan provided the information described in the Facility/Process Description above.

Mr. Sullivan told the inspectors that the ship dock was rebuilt in 2007. The loading rack that operates at the facility was installed in 2006. The loading rack is equipped with a Vapor Recovery Unit (VRU) that was replaced in 2017, and a vacuum-assist system. The VRU is designed to recover approximately 11 barrels of product per day, and the vacuum-assist system is designed to capture 25 tons of VOC per year. The facility also has a Vapor Combustion Unit (VCU) that is operated when ethanol is being offloaded from ships. The VCU was not in operation at the time of inspection.

B. Facility Tour

The inspectors and the facility representatives began the facility walk-through at 9:34 A.M. No photos were taken during the inspection due to intrinsic safety concerns.

1. West Side Storage Tank Area- 9:34 A.M.

The group proceeded across the street from the office building to the West Side of Allens Avenue where the gasoline and ethanol storage tanks are located. Mr. Sullivan said that all tanks are equipped with auto shut-off valves. Mr. Kotsifas used a FLIR GF320X Camera to observe the tank that was being filled with gasoline from the ship. No emissions were observed.

The inspectors and facility representatives observed the fuel product lines. The lines have a fill rate of 6,800 barrels per hour. Mr. Kotsifas used the FLIR Camera to observe the gasoline line that was filling the tank from the ship. No emissions were observed. Mr. Sullivan told the inspectors that the fuel offloading began at approximately 8:30 A.M. that morning, and that it would take approximately 30 hours to fill.

The inspectors and facility representatives observed the rail offloading rack. Ships and barges have their own pumps that fill the fuel tanks, but fuel delivered by rail is required to be pumped by the

facility. Mr. Sullivan said there was currently no fuel being delivered by rail, but that the facility was expecting a delivery in the next month.

2. Loading Rack Area- 10:03 A.M.

The group returned across Allens Avenue to the loading rack area. The inspectors first observed the VRU. A detonation arrestor draws vapors through one of two carbon vessels, switching vessels approximately every fifteen minutes, releasing vacuum. Mr. Kotsifas used the FLIR Camera to observe the stack vent located between the two carbon vessels during a switch. No emissions were observed.

The group proceeded to loading rack lane #4 where there was a truck loading diesel at the time of inspection. The fill lines at the loading rack are equipped with poppet valves, and trucks are filled at a rate of 1,800 gallons per minute (three arms each at 600 gallons per minute).

The inspectors observed the loading rack pressure vacuum vents at lane #2. Mr. Sullivan told the inspectors that the target pressure differential being pulled is -1.6-1.7 inches of water column (" W.C.), and that fill flows will begin to fluctuate if pressure exceeds -2.54" W.C. Mr. Sullivan said that the system would only alarm and vent if it was to reach -18" W.C., but also that filling shuts off before it reaches that point.

Mr. Kotsifas used the FLIR Camera to observe a pressure vacuum vent, and a product line flange at the loading rack. No emissions were observed.

3. Ship dock- 10:20 A.M.

The group proceeded to the dock to see the ship that was being offloaded. The ship was actively pumping gasoline, so the inspectors were not able to get close to the fill line connector. Mr. Kotsifas used the FLIR Camera to observe the ship and the fill line. Exhaust emissions were observed from the ship engine, and no emissions were observed from the fill line.

4. Control Room and Diesel Fire Pump- 10:30 A.M.

The group proceeded to the control room so the RIDEM inspectors could review EPA Method 27 test reports for individual trucks that load onsite. The control room records a daily report for operation time and emissions. The TMS Rack system displays live information including driver name, carrier, vehicle ID, and date of certification for annual inspection. Trucks are expected to arrive empty and are equipped with overfill alarms that use sensors in the trucks.

The group went to the diesel fire pump house. The runtime for the fire pump was 35:49:24 at time of inspection. The inspectors were told that the fire pump runs for less than one hour annually, and that it would only ever be used for an emergency relating to the dock.

The group returned to the conference room at 11:00 A.M.

C. Records Review

The RIDEM inspectors commenced the records review portion of the Title V Inspection with assistance from the EPA inspectors. Facility representatives confirmed that no significant changes to the facility

had occurred since the last Title V Permit update, and that there were no upcoming or anticipated changes.

During the Title V Inspection, Ms. Perry reviewed the following records:

- From TRACE data management system:
 - August 2024 daily operating hours
 - April 2025 monthly excess emissions report
 - April 2025 daily operating hours and 12-month rolling total high pressure hours
 - December 2023 and December 2024 12-month rolling total high pressure operating hours
- 2024 total gas throughput
- Driver Training Information
- 2024 Quarterly VRU preventative Maintenance Records
- Daily throughputs for March 19, 2025
- Gasoline additive records
- Five years of Vessel loading Checklist and Marine Loading Data
- PICS calibration data report for VRU pressure transmitter
- 12/31/24 10-Year Inspection Report for Tank 7521 dated 12/31/24 and follow-up inspection
- Fuel receipts for diesel fire pump

RIDEM inspector Ms. Giglietti reviewed the Diesel Fire pump hour meter readings. She noted to the facility representatives that the hours had been recorded improperly; the records displayed the minutes and seconds reading from the hour meter without including the total number of hours.

The inspectors concluded the Title V Inspection records review at 2:58 P.M.

D. Closing Conference

Ms. Perry told the facility representatives that she would send an EPA inspection report within 70 days, in addition to the Title V inspection report from RIDEM, and that EPA inspectors do not make compliance determinations in the field. Facility representatives confirmed that no Confidential Business Information had been discussed during the inspection.

The inspectors departed the facility at 3:05 P.M.