



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

Clean Air Act Inspection Report

Drafted: September 13, 2022

Finalized: September 21, 2022

EPA Inspector: Hannah Patel, Environmental Scientist, Air Compliance Section /HHP/

EPA Reviewer: Darren Fortescue, Senior Enforcement Coordinator, Air Compliance Section /DEF/

Date of Inspection: August 19, 2022

Facility Name: Citgo Petroleum Corporation

ICISAir ID#: CT0000000900300912

Facility Location: 109 Dividend Road, Rocky Hill, CT 06067

Mailing Address: Same as above

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.

Inspection Attendees:

Name	Title	Organization
Hannah Patel	Environmental Scientist/Inspector	EPA Region 1
Davianna Vasconcelos	Environmental Engineer	EPA Region 1
Tyler Kotsifas	Physical Scientist	EPA Region 1, LASAD
Steve Rapp	Senior Engineer	ERG
Brian Minichino	Terminal Manager	Citgo

Facility/Process Description:

The facility located at 109 Dividend Road, Rocky Hill, Connecticut has always been owned by Citgo Petroleum Corporation (“Citgo”).

The facility receives and stores petroleum products from the Buckeye Pipeline. The facility has a dock on-site that is inactive due to low water levels in the channel. The facility has 4 storage tanks, 3 of which are commissioned for gasoline storage and one for ethanol. The facility distributes petroleum products by loading them into trucks via a loading rack. The facility does not load any products onto barges.

Number of Employees and Working Hours:

Citgo employs 2 employees at the facility and over 1,000 employees nationwide.

The facility operates 24 hours a day, 7 days a week, 52 weeks a year.

Potentially Applicable Clean Air Act Requirements:

- 40 CFR Part 60 Subpart XX – Standards of Performance for Bulk Gasoline Terminals
- 40 CFR Part 60 Subpart A – General Provisions
- 40 CFR Part 63 Subpart BBBB – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities
- 40 CFR Part 63 Subpart A – General Provisions
- New Source Review Permit # 155-0012

Previous Enforcement Actions:

A “Detailed Facility Report” from EPA’s Enforcement and Compliance History Online database indicates that there have been no informal or formal enforcement actions against the facility in the last five years.

Opening Conference:

On August 19, 2022, at 3:00 pm, EPA personnel Davianna Vasconcelos, Hannah Patel, and Tyler Kostifas, CT DEEP personnel Mark Potash, and ERG personnel Steve Rapp arrived at the facility located at 109 Dividend Road, Rocky Hill, Connecticut, and met with Brian Minichino of Citgo. Ms. Patel presented her credentials to Mr. Minichino and initiated an opening conference.

Ms. Patel said the purpose of the inspection was to conduct forward looking infrared (“FLIR”) monitoring of the gasoline storage tanks located at the facility, and to monitor the percent of the

lower explosive limit (“%LEL”) of the headspace above the internal floating rooves (“IFR”s) of select gasoline storage tanks.

Mr. Minichino contacted Don Girffen, the Regional Health and Safety Officer for Citgo, and explained the purpose of our visit. Mr. Minichino then wrote a “working permit” for the group to gain access to the facility.

Facility Tour:

Mr. Minichino led the group on a tour of the facility.

Mr. Minichino then explained that Tank 1 contains Premium gasoline, Tank 2 contains regular gasoline, Tank 3 contains ethanol and Tank 4 contains regular gasoline.

Mr. Kotsifas conducted FLIR monitoring using a FLIR camera to survey tank vents for emissions. Mr. Kotsifas did not observe any gasoline storage tank emissions using the FLIR camera and the group did not detect any odor. Mr. Kotsifas did not record any video using the FLIR.

As a result of not observing any emissions using the FLIR, the group decided not to conduct %LEL monitoring of the headspace above the IFRs of any of the gasoline storage tanks located at the facility.

Mr. Minichino explained that the facility has a Vapor Recovery Unit (“VRU”) on site to control emissions from the loading rack.

Records Reviewed:

Ms. Patel viewed a record of an inspection report completed by EPA Inspectors, that described that tank hatches and headspace were monitored for %LEL, and she documented that this occurred on 6/29/2016.

Closing Conference:

Mr. Minichino said that hatch inspections and out of service inspections are conducted on a routine basis. Mr. Minichino confirmed the facility has not had any leaks or excess emissions events in the last 12 months.

Ms. Vasconcelos said that if any of the information supplied during the inspection is considered confidential business information, then the facility should let EPA know.

Ms. Patel thanked Mr. Minichino for his time. Inspecting personnel left the facility at 3:33pm.