



Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	04/18/2022	
Media Program:	Air	
Regulatory Program(s)	SIP, Title V	
Company Name:	NuStar Energy L.P.	
Facility Name:	St. James Terminal	
Facility Physical Location:	7167 Koch Road	
(city, state, zip code)	St. James, LA, 70086	
County/Parish:	St. James Parish	
Facility Phone Number	225-746-2117	
Facility Contact:	Brad Roig	Health, Safety and Environmental (HSE)
	Brad.roig@nustarenergy.com	
FRS Number:	110007278908	
Identification/Permit Number:	LDEQ Agency Interest Number 36538, Title V: 2560-00013-V9	
Media Identifier Number:	AFS#: 22-093-00013	
NAICS:	424710, Petroleum Bulk Stations and Terminals	
SIC:	5171, Petroleum Bulk Stations and Terminals	
Personnel participating in inspection:		
Christopher Williams	EPA-OECA-OCE-AED	Chemical Engineer
Richard Helmich, Ph.D.	OECA-OCEFT-ONEIC-LB	Senior Chemist
David Mahoney	OECA-OCEFT-ONEIC-FB-CRSS	Physical Scientist Technician
Ali Gitipour, Ph.D.	EPA-ORD-CEMM-AMCD	Federal Postdoctoral Research Fellow/Chemical Engineer
Cory Lormand	LDEQ-OEC-Surveillance Division	Environmental Scientist
EPA Lead Inspector Signature/Date		
	Christopher Williams	Date
Supervisor Signature/Date		
	{Supervisor name}	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

On April 18, 2022, the Government Team consisting of Mr. Richard Helmich (EPA-NEIC), Mr. Ali Gitipour (EPA-ORD), Mr. David Mahone (EPA-NEIC), Mr. Christopher Williams (EPA-OECA) and Mr. Cory Lormand (LDEQ-OEC) arrived at the NuStar Energy L.P. (“Nustar”) St. James Terminal in St. James Parish at around 1:30 P.M. local time to conduct an unannounced Clean Air Act (“CAA”) inspection.

The Government Team signed in with security at the gate and were directed to a conference room in the main office building. In the conference room the Government Team was introduced to NuStar representatives Mr. Brad Roig, HSE Supervisor, Mr. Marcello Cornejo, Terminal Manager, and Mr. Jean Zeringue, General Manager of Operations. Mr. Williams presented his inspector credentials to Mr. Zeringue and notified him of the Government Team’s intent to conduct a CAA Partial Compliance Evaluation (“PCE”). This inspection occurred as part of the Administrator’s Multi-Scale Monitoring Project called the Pollution Accountability Team (PAT).

FACILITY DESCRIPTION

Petroleum products are transported to the St. James Terminal (LDEQ Agency Interest Number 36538) by barges, ships, pipelines, rail cars and truck where they are either stored until shipped out by barges, ships an pipelines or to other facilities or pipelines. The petroleum products transported to/from and stored at the St James Terminal include crude oil, no. 6 oil, distillate fuel oil no. 2, vacuum gas oil and marine diesel. The facility operated over 35 storage tanks with a combination of fixed roofs, external floating roofs (“EFRs”), and internal floating roofs (“IFRs”).

Section II – OBSERVATIONS

Opening Conference

At around 1:55 P.M., the Government Team conducted an opening conference with NuStar representatives, Mr. Roig, Mr. Carnejo and Mr. Zeringue. Mr. Helmich explained that the compliance evaluation would include a mobile air monitoring survey of the facility using Geospatial Measurement of Air Pollution (“GMAP”) and provided an overview of the vehicle and equipment. Mr. Williams explained that he would be using a FLIR GF320 optical gas imaging (“OGI”) camera and a handheld photoionization detector (“PID”) to locate any hydrocarbon emission sources upwind of detections made by GMAP. Mr. Helmich and Mr. Williams asked the NuStar representatives to begin processing any hot work permits required by the company to gain full access to the facility using the described equipment. Mr. Williams asked the company to let the Government Team know if any Confidential Business Information is obtained during the PCE, so that the information could be treated by the custodians as such. Mr. Carnejo confirmed that the facility was operating as normal and that EFR Tank 9 was the only tank being loaded at this time. At around 2:20 P.M. the opening conference concluded, and the Government Team prepared the vehicles and equipment for entry into the tanks’ operations area.

Site Tour

At around 2:25 P.M., Mr. Williams took a photo of the NuStar entry sign (DC_171.jpg) and the Government Team began the site tour. Conditions were sunny with some cloud cover, and with moderate winds coming from the north to northwest. In the mobile air monitoring vehicle, Mr. Helmich, Mr. Gitipour and Mr. Mahone were escorted by Mr. Roig. In a company vehicle following, Mr. Williams and Mr. Lormand were escorted by Aaron Martinez, Maintenance. The mobile air monitoring vehicle drove on all available roads in the tanks' operations area.

At around 3:00 P.M. downwind of IFR Tank 25, GMAP detected elevated concentrations of VOC (at around 2,500 ppb) at ground-level. Mr. Williams and Mr. Lormand exited the vehicle to inspect Tank 25. Using OGI, Mr. Williams recorded video MOV_172 of emissions emanating from the downwind brow vents and video MOV_173 of emissions emanating from the upwind brow vents on Tank 25. Mr. Roig confirmed that Tank 25 was not loading at the time of the emissions observations.

At around 3:40 P.M. downwind of the EFR Tank 6, GMAP detected elevated concentrations of VOC (at around 1,200 ppb) at ground-level. Mr. Williams, and Mr. Lormand exited the vehicle to inspect Tank 6. Using OGI, Mr. Williams recorded video MOV_174 of emissions coming out of the top rim of Tank 6. Mr. Roig confirmed that Tank 6 was not loading at the time of the emissions observations.

At around 3:50 P.M., the Government Team exited the tanks' operations area and returned to the conference room.

Section III – AREAS OF CONCERN

At around 4:00 P.M., the Government Team conducted a closing conference with NuStar representatives Mr. Roig, Mr. Carnejo and Mr. Zerinque. Mr. Helmich and Mr. Williams provided a summary of the areas of concern, which include the observations of emissions coming from Tank 25 and Tank 6 as described above. Mr. Williams was designated as the EPA contact for any potential follow-up. The closing meeting concluded at around 4:30 P.M. and the Government Team exited NuStar's facility.

Section IV – FOLLOW UP

No additional information was received by EPA after exiting the NuStar's facility on April 18, 2022.

Section V – LIST OF APPENDICES

Appendix 1 – Photo and Video Log – 1 photo and 3 OGI videos taken April 18, 2022.

Appendix 1

Photo and Video Log

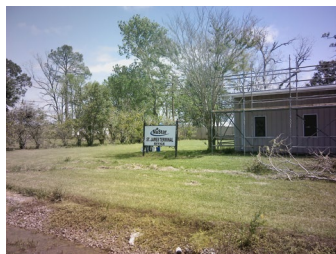


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1

Photo and Video Log

Location: NuStar St. James Parish		
City: St. James	St. James Parish	State: Louisiana



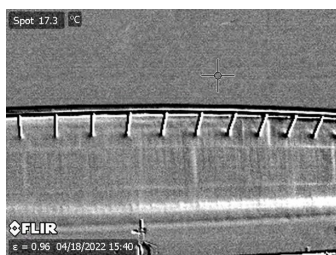
File Name: DC_171.jpg
 Date taken: 04/18/2022
 Time taken: 2:26 pm
 Videographer: Christopher Williams
 Description: Photo of the NuStar entry sign.



File Name: MOV_172.mp4
 Date taken: 04/18/2022
 Time taken: 3:09 pm
 Videographer: Christopher Williams
 Description: OGI video of emissions emanating from downwind brow vents on Tank 25.



File Name: MOV_173.mp4
 Date taken: 04/18/2022
 Time taken: 3:28 pm
 Videographer: Christopher Williams
 Description: OGI video of emissions emanating from upwind brow vents on Tank 25.



File Name: MOV_174.mp4
 Date taken: 04/18/2022
 Time taken: 3:41 pm
 Videographer: Christopher Williams
 Description: OGI video of emissions from the top circumference of Tank 6.