



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

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

**URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE**

Dated by electronic signature

Jason Littlefield, Environmental Manager
Sprague Resources LP
100 Dexter Road
East Providence, RI 02914
jlittlefield@spragueenergy.com

Re: Clean Air Act Monitoring Requirement

Dear Mr. Littlefield:

The United States Environmental Protection Agency ("EPA") is evaluating whether Sprague Resources LP ("Sprague"), located at 100 Dexter Road, East Providence (the "Facility"), is in compliance with the Clean Air Act ("CAA" or "Act") and requirements promulgated under the Act.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether such person is in compliance with the Act and its implementing regulations.

In particular, EPA is evaluating the facility's compliance with the federally enforceable regulations of Rhode Island's State Implementation Plan, such as Air Pollution Control Regulation No. 11 for Petroleum Liquids Marketing and Storage, as well as federal regulations governing gasoline storage.

Specifically, EPA is requiring that Sprague take the following steps to monitor and report on the vapor present in the headspace of gasoline tanks at the Facility:

1. Within 15 days of receipt of this Monitoring Requirement, contact EPA's Bill Osbahr (osbahr.william@epa.gov), to coordinate on scheduling the monitoring event/s so that EPA can attend and observe. During scheduling, please consider weather forecasts, as monitoring is to be conducted with wind speeds at or below 5 mph.

2. Monitor the concentration of volatile organic compound (VOC) vapor present in the headspace of the following gasoline storage tanks,¹ as a percentage (%) of the lower explosive limit (LEL) of gasoline, in accordance with procedures described in Attachment 1:
 - a. Tank 67
 - b. Tank 153
 - c. Tank 154
3. Within 45 days of completing the last monitoring activity submit a final spreadsheet report for each tank using Attachment 2. Provide these reports, and all raw data used to generate the reports, to Darren Fortescue, via email at Fortescue.darren@epa.gov.

Be aware that if Sprague does not provide the information required in this Monitoring Requirement in a timely manner, EPA may order it to comply and may assess monetary penalties under Section 113 of the Clean Air Act. Federal law also establishes criminal penalties for providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B. Note that certain categories of information, such as emission data, are not properly the subject of such a claim. If no such claim accompanies the information when EPA receives it, EPA may make the information available to the public without further notice to you.

If you have any questions regarding this Monitoring Requirement, please contact Darren Fortescue at (617) 918-1162, or have your attorney contact Steven Viggiani, Senior Enforcement Counsel, at (617) 918-1729.

Sincerely,

JAMES CHOW
Digitally signed by JAMES
CHOW
Date: 2021.05.19 13:30:45
-04'00'

James Chow, Deputy Director
Enforcement and Compliance Assurance Division

cc: Chris John, RI DEM
David Chopy, RI DEM

¹ As identified in the response to EPA's Information Request Dated August 19, 2020

Attachment 1

Procedures for Headspace Vapor Monitoring (as a percentage of lower explosive limit (LEL))

1. Equipment and Supplies

- a. A multigas LEL meter that is intrinsically safe and classified for use in Class I, Division I hazardous locations, capable of logging LEL data at 15 second intervals, has a sampling pump sampling tube capacity of at least 100 feet and the manufacturer has published correction factors for product stored in the tank.
- b. Sample tubing, such as Teflon™, long enough to sample within 3 feet of the surface of the internal floating roof of the tanks identified in this information request. The tubing should be weighted to ensure it reaches the required depth².
- c. A cradle that secures the multigas LEL meter and junction to the sampling tube.
- d. A span calibration gas cylinder containing a mixture of 2.5% methane in air by volume, with a cylinder pressure greater than 150 psi. The cylinder vendor must provide a *Certificate of Analysis* for the gas, certifying the methane concentration to be accurate within $\pm 2\%$.
- e. A demand flow regulator for the calibration gas cylinder.
- f. A zero air gas cylinder.
- g. A handheld wind speed monitor.

2. Monitoring Procedure

a. Pre-monitoring Activities

Document the following:

- i. The date of the monitoring event.
- ii. The facility data described in the “Gasoline LEL Monitoring Datasheet.xlsx.”
- iii. The ambient air temperature.
- iv. The tank identifier and tank fill level.
- v. The temperature of tank’s contents.
- vi. The product in the tank.
- vii. The Reid vapor pressure of product.
- viii. The location of the monitoring.

b. System Calibration

- i. Ensure the multigas LEL meter’s system date and time are correct, and the data-log recording interval is set to 15 seconds.
- ii. Ensure the multigas LEL meter is setup to record VOC data as methane, with no correction factor.
- iii. Conduct all calibration procedures through the sample tubing.
- iv. Document the multigas LEL meter’s manufacturer and model number.
- v. Document the sample tubing’s length.

² Note that the LEL meter should not be lowered into the tank, just the sample tubing. The sample line will need to be weighted, to prevent the tube from forming a coil as it is lowered into the tank. For example, this could be achieved by using a brass bulkhead union attached to a short section of PVC pipe.

- vi. Use the zero air gas cylinder and demand flow regulator to perform a Zero Calibration of the multigas LEL meter according to the manufacturer's written procedures. Document that zero gas is being used for the calibration and note the time of reading. The multigas LEL meter must display a "pass" for the Zero Calibration in accordance with the manufacturer's written procedures.
- vii. Use the span calibration gas cylinder and demand flow regulator to perform a single sensor span calibration for methane of the multigas LEL meter, according to the manufacturer's written procedures. Document the number of seconds it takes to reach 90% of the certified value during the calibration procedure (Response Time)³. Document the calibration gas certified value and note the time of reading. The multigas LEL meter must display that the calibration procedure was successful, in accordance with the manufacturer's written procedures.

c. Monitoring

- i. Measure the wind speed, using the handheld wind speed monitor⁴. Document the wind speed at the start of monitoring and note time of the reading.
- ii. Ensure that the weighted sample tubing is secured to the multigas LEL meter.
- iii. Lower the tubing into the storage tank, so that it is drawing a sample from within 3 feet of the surface of the internal floating roof.
- iv. Ensure the multigas LEL meter is operational⁵ and drawing a sample through the tubing.
- v. Check that the multigas LEL meter is reading oxygen levels above 10%⁶.
- vi. Allow the multigas LEL meter to collect and record a minimum of 35 minutes of data. Document the start and end times of the monitoring event.
- vii. Measure the wind speed, using the handheld wind speed monitor. Document the wind speed at the end of monitoring and note the time of the reading.

d. Post Monitoring Drift Check

- i. Conduct all post monitoring checks through the sample tubing.
- ii. Attach the span calibration gas cylinder and demand flow regulator to the sample tubing. Allow the multigas LEL meter enough time to establish a stable reading. Document the time of the reading.
- iii. Attach the zero air gas cylinder and demand flow regulator. Allow the multigas LEL meter enough time to establish a stable reading. Document the time of the reading.

³ If multiple monitoring events are conducted, response time only needs to be recorded once, as long as the same meter and sampling tube are used in each event.

⁴ Monitoring should only be performed if wind is less than or equal to 5 mph throughout the monitoring event.

⁵ The multigas LEL meter must be setup to record all %LEL data as methane, with no correction factor. In addition, the multigas LEL meter must not show any system alarms related to issues such as: inlet blocked, pump failure, low battery, calibration failed or data log full.

⁶ Note that LEL sensors require oxygen for combustion and cannot be used in environments that contain less than 10 vol% oxygen.

3. Report Preparation

- a. Download the data from the multigas LEL meter.
- b. Use the multigas LEL meter data and the information collected during the above procedures, to prepare a report using the attached “Gasoline LEL Monitoring Datasheet.xlsx” spreadsheet⁷.
- c. Enter the multigas LEL meter manufacturer’s published correction factor for the product stored in the tank into the spreadsheet.
- d. Use the downloaded data to identify the following calibration data in the report:
 - i. The calibration zero %LEL reading.
 - ii. The measured calibration gas %LEL reading.
 - iii. The post monitoring calibration gas %LEL reading.
 - iv. The post monitoring zero %LEL reading.
- e. Use the downloaded data to identify the data set associated with the 35-minute monitoring event described in section C. vi. above. Discard the first 5 minutes of data and use the remaining 30-minute dataset to populate time, oxygen concentration and %LEL readings for the monitoring event.

Attachment 2

Gasoline LEL Monitoring Datasheet Sprague.xlsx

⁷ The “Gasoline LEL Monitoring Datasheet.xlsx” spreadsheet contains a separate tab for each gasoline storage tank identified in this monitoring request.