



REGION 5

CHICAGO, IL 60604

MEMORANDUM

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Gateway Terminals LLC, Sauget, IL

FROM: David Sutlin, Environmental Engineer
AECAB (MN/OH)

THRU: Brian Dickens, Section Supervisor
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: Gateway Terminals, LLC

Facility Location: 4 Pitzman Ave., Sauget, Illinois 62201

Date of Inspection: May 7, 2024

EPA Inspector(s):

1. David Sutlin, Environmental Engineer
2. Liam Klaiman, Environmental Engineer

Other Attendees:

1. Johnathan Braddy, Terminal Manager
2. Lucas Voyer, Alternate Facility Security Officer/Operations Supervisor

Contact Email Address: johnathanb@harvestonegroup.com

Purpose of Inspection: To assess compliance with National Emission Standards for Hazardous Air Pollutants Subpart BBBBBB – Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities (NESHAP Subpart BBBBBB) and the Standards of Performance for New Organic Liquid Storage Vessels (NSPS Subpart Kb), with a focus on the facility's tanks.

Facility Type: Petroleum Bulk Terminal

Facility Name: Gateway Terminals, LLC
Facility Location: 4 Pitzman Ave., Sauget, Illinois 62201
Date of Inspection: May 7, 2024

Regulations Central to Inspection: NESHAP Subpart BBBBBB, including the obligation to control volatile organic compound (VOC) emissions from tanks by, among other options, installing an internal floating roof with seals (IFR); NSPS Subpart Kb, which is referenced by NESHAP Subpart BBBBBB, including the obligation to perform annual “through-the-hatch” inspections of the IFR tanks and out-of-service inspections at least every 10 years, in order to ensure that the IFR is not in disrepair.

Arrival Time: 2:00 PM

Departure Time: 4:30 PM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Johnathan Braddy and Lucas Voyer unless otherwise noted.

Company Ownership: Gateway Terminals began operations in 2008. In 2021 Harvestone Group purchased Gateway Terminals from Seacor.

Process Description:

The facility receives, stores, and distributes ethanol. Ethanol is offloaded mainly from railcars, but also from trucks, and is pumped to one of four IFR tanks, each with a capacity of approximately 4 million gallons. From the tanks, ethanol is pumped and loaded mainly into barges, but occasionally into trucks.

Staff Interview:

- A typical rail shipment consists of 100 rail cars, where railcar unloading of ethanol occurs 12 rail cars at a time.
- Railcar and truck loading/unloading is controlled by a truck/rail vapor destruction unit.
- Barge loading is controlled by a marine vapor combustion unit (MVCU).
- Preventative maintenance is done annually on both combustion units, and both combustion units are assisted by natural gas which gets hard piped in.
- Each tank’s IFR features both a primary and a secondary seal between the IFR and the tank wall.
- All tanks were installed in 2008.

Facility Name: Gateway Terminals, LLC
Facility Location: 4 Pitzman Ave., Sauget, Illinois 62201
Date of Inspection: May 7, 2024

- No issues with the IFRs were detected on the most recent tank inspections for each tank, except a portion of one of the seals was replaced on Tank 101.
- A third party performs annual preventative maintenance on the vapor combustion units.
- The facility will not “burn” upon loading barges, when the prior cargo was also ethanol, which is the case most of the time, and that therefore the MVCU is almost never used.
- The facility used to operate a boiler as part of its crude oil business, but this has been inoperable for quite some time.

TOUR INFORMATION

EPA Toured the Facility: Yes

Data Collected and Observations:

No loading or unloading of ethanol occurred during the inspection.

EPA used a FLIR camera, which uses optical gas imaging technology to visualize organic emissions, to screen all four tanks for emissions escaping the IFRs. While the regulations do not require 100% control, emissions detected with the FLIR could potentially indicate disrepair of the IFRs. EPA recorded FLIR videos of emissions from the side vents of tanks 101, 102, and 104. Gusty winds were present at this time, and this is known to increase the likelihood of emission visualization through the FLIR.

EPA climbed to the top of Tank 104 with the intention to simulate a through-the-hatch inspection. However, the hatch was close to the edge of the tank and beyond the protective railing. Given the gusty winds, EPA was not comfortable completing this observation.

EPA also used the FLIR to scan the charged ethanol lines, pumps, valves, and flanges but did not observe any potential emissions.

Photos and/or Videos: were taken during the inspection and are listed in Appendix A.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- The 2 most recent through-the-hatch inspection reports for each tank
- The most recent out-of-service inspection report for each tank
- The most recent preventative maintenance inspection report for each combustion unit

Compliance Assistance: Noting the FLIR videos detected potential emissions at 3 tanks, EPA recommended that the facility conduct follow-up inspections on these tanks.

Facility Name: Gateway Terminals, LLC
Facility Location: 4 Pitzman Ave., Sauget, Illinois 62201
Date of Inspection: May 7, 2024

DIGITAL SIGNATURES

Report Author: **DAVID
SUTLIN**



Digitally signed by DAVID
SUTLIN
Date: 2024.06.13
14:03:00 -05'00'

Section Supervisor: **BRIAN
DICKENS**



Digitally signed by BRIAN
DICKENS
Date: 2024.06.13
16:02:54 -05'00'

APPENDICES

Appendix A: Digital Video Log

Facility Name: Gateway Terminals, LLC
Facility Location: 4 Pitzman Ave., Sauget, Illinois 62201
Date of Inspection: May 7, 2024

APPENDIX A: DIGITAL IMAGE LOG AND DIGITAL VIDEO LOG

Inspector Name: David Sutlin **Archival Record Location:** R5 Electronic Record Center – ECAD > AECAB Library > Enf_Gateway Terminals_IL_24 > Enf_Gateway Terminals_IL_24_Inspection > FLIR Videos

Image Number	File Name	Date and Time	Description of Image
1	MOV_3392.mp4	5/7/2024 15:12	FLIR video of Tank 104
2	MOV_3393.mp4	5/7/2024 15:30	FLIR video of Tank 102
3	MOV_3394.mp4	5/7/2024 15:37	FLIR video of Tank 101