



## REGION 10

SEATTLE, WA 98101

### RETURN RECEIPT REQUESTED

Joshua Lakomiak  
Shell Portland Distribution Terminal  
3800 Northwest Saint Helens Road  
Portland, Oregon 97210

Re: INFORMATION REQUEST Regarding 3800 Northwest Saint Helens Road, Portland, Oregon

Dear Joshua Lakomiak:

The U.S. Environmental Protection Agency (EPA), Region 10 seeks information concerning the Shell Portland Distribution Terminal facility owned or operated by Triton West LLC, located at 3800 Northwest Saint Helens Road in Portland, Oregon 97210 ("Facility"). The enclosed Information Request is issued to Triton West LLC pursuant to Section 114 of the Clean Air Act (CAA or "Act"), 42 U.S.C. § 7414.

Under Section 114(a) of the Act, 42 U.S.C. § 7414(a), EPA is authorized to require any person who owns or operates an emissions source to establish and maintain records; make reports; sample emissions (in accordance with the procedures and methods that the Administrator shall prescribe); install, use and maintain monitoring equipment; and provide such other information as the Administrator may reasonably require for the purpose of determining whether any violations of the CAA have occurred and for other purposes of the CAA. Triton West LLC is hereby required to provide information and documents in accordance with the enclosed Information Request within the timeframes set forth in Section C of Enclosure 1. If you anticipate being unable to fully respond to this Information Request by the specified timeframes, you may request an extension within **15 days** of receipt of this request. Include a justification for your extension request. If timely submitted, EPA will consider your request and may extend the deadline. An extension of time will be effective only if granted by EPA in writing.

Please submit responses to this Information Request via an electronic submission. For instructions on submitting your response electronically, refer to Instruction 9 in Enclosure 1. Please contact Elly Walters, at (206) 553-6317 or [walters.elizabeth@epa.gov](mailto:walters.elizabeth@epa.gov) if you have any questions regarding the electronic submission instructions. If electronic submission is not possible, contact Elly Walters for additional options. If you intend to claim all or a part of your response as confidential business information (see Instruction 8 in Enclosure 1), contact Elly Walters.

Please ensure the Statement of Certification in Enclosure 2 is signed by a duly authorized officer or agent of Triton West LLC and returned with the responses to this Information Request.

Failure to timely respond fully and truthfully to this Information Request may subject you to civil penalties pursuant to Section 113 of the CAA, 42 U.S.C. § 7413. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. Your response to this Information Request may be used by EPA in administrative, civil, or criminal proceedings.

Thank you for your cooperation. If you have any questions regarding this Information Request or wish to request an extension, please contact Elly Walters, at (206) 553-6317 or [walters.elizabeth@epa.gov](mailto:walters.elizabeth@epa.gov). For legal matters or questions from legal counsel, please contact Erin Tanimura, in the Office of Regional Counsel, at (206) 553-8630 or [tanimura.erin@epa.gov](mailto:tanimura.erin@epa.gov).

Sincerely,

MORGAN JENCIUS

Digitally signed by MORGAN  
JENCIUS  
Date: 2024.05.17 14:33:33 -07'00'

Morgan Jencius, Chief  
Air and Land Enforcement Branch  
Enforcement and Compliance Assurance Division

Enclosures

cc: David Mulkey  
Environmental Advisor, Shell Portland Distribution Terminal

Becka Puskas  
Office of Compliance and Enforcement Manager, Oregon Department of Environmental Quality

Lisa Ball  
Northwest Region Air Quality Manager, Oregon Department of Environmental Quality

Joshua Alexander  
Northwest Region Air Quality Manager, Oregon Department of Environmental Quality

**ENCLOSURE 1**  
**CLEAN AIR ACT INFORMATION REQUEST**

**Triton West LLC – Shell Portland Distribution Terminal**

**A. INSTRUCTIONS**

1. Provide a separate narrative response to each question and subpart of a question in this Information Request. Mark each answer with the number of the question (and subpart, if applicable) to which it corresponds.
2. For each question, provide a copy of each document relied on or referred to in the preparation of the response or that contains information responsive to the question.
3. Indicate on each document produced in response to this Information Request, or in another reasonable manner, the number of the question to which it corresponds.
4. If requested information or documents are not known or are not available to you at the time of your response to this Information Request, but later become known or available to you, you must supplement your response to EPA. Moreover, if you find at any time after submission of your response that any portion is or becomes false, incomplete, or misrepresents the facts, you must provide EPA with a corrected response as soon as possible.
5. Provide the name, title, and business contact information for each person who prepared or was consulted in the preparation of your response. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained in this Information Request, or who may be able to provide additional responsive documents, provide the name, title and business contact information for each such person and the additional information or documents that they may have.
6. If you believe a question is not applicable to the Facility, explain the reason for that belief.
7. The enclosed Statement of Certification (Enclosure 2) must be filled out and signed by a responsible corporate official and submitted along with your responses to this Information Request.
8. The information requested must be provided whether or not you regard part or all of it as a trade secret or confidential business information. You may assert a confidentiality claim covering part or all of the information submitted, pursuant to Section 114 of the Clean Air Act (CAA), 42 U.S.C. § 7414 and 40 C.F.R. Part 2, by placing on (or attaching to) the information, at the time it is submitted to EPA, a cover sheet, stamped or typed legend or other suitable form of notice employing language such as “trade secret,” “proprietary,” or “company confidential.” Allegedly confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by EPA.

Information covered by such a claim will be disclosed by EPA only to the extent and by the procedures set forth in statutes and 40 C.F.R. Part 2, Subpart B. See 40 C.F.R. § 2.301 for additional rules governing certain information obtained under the CAA. Note that certain

categories of information, including “emission data,” are not entitled to confidential treatment. Unless you make a claim at the time you submit the information in the manner described in 40 C.F.R. § 2.203(b), it may be made available to the public by EPA without further notice to you. See also 41 Fed. Reg. 36902 (Sept. 1, 1976).

9. We ask that you submit your responses electronically by uploading all required information to a web link that will be shared with the appropriate Triton West LLC personnel. These electronic submissions are in lieu of hard copy. Please contact Elly Walters, at 206-553-6317 or [walters.elizabeth@epa.gov](mailto:walters.elizabeth@epa.gov) to make arrangements to submit your response electronically.

## **B. DEFINITIONS**

All terms used in this Information Request have their ordinary meaning unless such terms are defined in the Act, 42 U.S.C. § 7401 *et seq.*, or the CAA implementing regulations. For purposes of this Information Request:

1. The terms “you” or “Respondent” mean Triton West LLC (“Triton West”), and its subsidiaries, officers, directors, managers, partners, employees, contractors and agents, as applicable.
2. “Facility” means the Shell Portland Distribution Terminal owned or operated by Respondent located at 3800 NW St. Helens Road in Portland, Oregon 97210.
3. “Document” includes writings, records, or information of any kind, formal or informal, whether handwritten, typed, or otherwise recorded in or on any format or media. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. Include all attachments to or enclosures with any responsive document.

## **C. INFORMATION REQUEST**

Conduct the following monitoring and sampling of fenceline emissions according to the methods specified below and provide the following information for the Facility according to the timelines specified in each item. Unless otherwise stated, this information shall be submitted in Microsoft Excel, Microsoft Word or optical character recognition (OCR) Adobe Acrobat PDF format depending on the request.

1. In accordance with the timeframes specified in Request Nos. 2–5 below, Triton West shall install, use, and maintain air monitoring equipment and sample for benzene, toluene, ethylbenzene, xylenes, and n-hexane in conformance with Methods 325A/B of Appendix A of 40 C.F.R. Part 63, and in conformance with the following requirements:
  - a. Use passive samplers containing Carbopack™ X with the uptake rates listed in Table 1 report fenceline concentrations. An equivalent sorbent may be used subject to approval in the Sampler Location Plan specified in Request No. 2.

**Table 1: Validated Uptake Rates (mL/min) for Clean Air Act Compounds**

Compounds	Carbopack™ X
Benzene	0.67
Toluene	0.52
Ethylbenzene	0.46
m,p-Xylene	0.46
o-Xylene	0.46
n-Hexane	0.52

- b. A 14-day monitoring period shall be used. When extenuating circumstances do not permit safe deployment or retrieval of passive samplers (e.g., extreme weather, power failure), sampler placement or retrieval earlier or later than the prescribed scheduled is allowed but must occur as soon as safe access to sampling sites is possible.
        - c. Collect and record hourly average meteorological data, including temperature, barometric pressure, wind speed, and wind direction and calculate daily unit vector wind direction and daily sigma theta using either an on-site meteorological station in accordance with Section 8.3.1 through 8.3.3 of Method 325A or, alternatively, using data from a United States Weather Service (USWS) meteorological station, provided that the USWS meteorological station is within 40 kilometers (25 miles) of the Facility.
2. No later than **30 calendar days** following receipt of this Information Request, submit to EPA for review and approval a site-specific Sampler Location Plan prior to conducting any fenceline emissions measurements. The Sampler Location Plan must include the following elements:
  - a. Any proposed alternative to the methods or procedures contained in Methods 325A or 325B;
  - b. The location of the meteorological station used to comply with Request No. 1c above. If using an on-site meteorological station, include the location of the meteorological station on an aerial map of the Facility; and
  - c. Each Methods 325A/B sampler location. Please list each sampler location using the attached template Excel spreadsheet “Shell Portland Terminal Sampler Locations.” For each sampler, include the following in the spreadsheet: the sampler’s name, latitude and longitude location coordinates in decimal format to five decimal places, identification of the sorbent to be used in the passive samplers, and the type(s) of monitors to be deployed at each location. (e.g., regular sampler, duplicate, field blank, etc.). Submit the spreadsheet to EPA in a TXT, CSV, XLS, or XLSX file format.
3. Beginning no later than **30 calendar days** after EPA’s written approval of the site-specific Sampler Location Plan, conduct fenceline monitoring as detailed in Request No. 1 above. Monitoring must be conducted in accordance with the Sampler Location Plan as approved by

the EPA. Triton West shall conduct **twenty-six continuous and consecutive 14-day monitoring episodes** at each location (for a combined total of 364 days of monitoring).

4. No later than the **first day of the first 14-day monitoring period**, submit to EPA a site-specific Fenceline Monitoring Plan. The Fenceline Monitoring Plan must include the following elements:
  - a. For each storage tank, provide the storage tank’s name/identification, storage capacity, type of product stored, and a description of any emission controls installed and operated for the storage tank, including whether the storage tank operates with an internal floating roof, an external floating roof, or closed vent system and control device;
  - b. An aerial facility map. Label each storage tank identified in Request No. 4a on the facility map;
  - c. Name and contact information for the person(s), including any contractor(s), responsible for designing and operating the monitoring program;
  - d. Name and contact information for the laboratory responsible for analyzing the sorbent tubes and producing the lab analytical report;
  - e. Procedures for deploying and recovering sorbent tubes;
  - f. Procedures for quality assurance to ensure the quality of data being produced; and
  - g. Procedures for calibration of meteorological equipment, if applicable.
  
5. Following **each of the twenty-six consecutive 14-day monitoring periods**, submit the following information to EPA no later than **21 calendar days** after the end date of each monitoring period:
  - a. The analytical results for the most recent 14-day monitoring period. The results must be submitted using the attached template Excel spreadsheet “Shell Portland Terminal Fenceline Results MM-DD to DD-YYYY” (“Fenceline Results spreadsheet”). Edit the “MM-DD to DD-YYYY” in the Fenceline Results spreadsheet file name to correspond with the 14-day monitoring period start and end dates for which the results are being submitted. Include all information identified in the template Fenceline Results spreadsheet and submit to EPA in a TXT, CSV, XLS, or XLSX file format.

Each sampler must be labeled in the Fenceline Results spreadsheet submittal in accordance with the Sampler Location Plan. Provide individual sample results in units of micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) for each sampler. Results must also be flagged using the Data Flags listed in Table 2 below, as applicable. If a Data Flag not listed in Table 2 is used, please include an explanation of the Data Flag in the “Comments” column of the Fenceline Results spreadsheet.

**Table 2: Data Flags and Codes**

<b>Code</b>	<b>Data Flag</b>
U	Compound not detected
E	Exceeded calibration range

S	Compound peak saturated the detector due to high concentration. Result estimated
B	Compound present in field blank(s) at a concentration greater than 1/3 of the sample result
D	Monitoring period outside of 14 ± 1 days
H	Sample analyzed outside of the Method holding time
I	Internal standard response outside of Method requirements
P	Field duplicate exceeds 30% Relative Percent Different (RPD)
Pc	Field duplicate exceeds 30% RPD. Concentrations of both sample and duplicate are near the Reporting Limit (RL)
M	Matrix interference present for primary ion. An alternative quantitation ion has been used
Fe	Field Error, e.g. Passive tube found on the ground
Le	Laboratory error, e.g. Sample tube cleaned prior to analysis
J	Estimated value between Method Detection Limit (MDL) and RL
X	See analytical narrative for a description of the data quality deficiency

- b. The lab analytical report for the most recent 14-day monitoring period. The report must include the beginning and end date of the monitoring period and individual sample results in units of micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) for each sampler. Each sampler must be labeled in accordance with the Sampler Location Plan.
- c. Provide the meteorological data, specified in Request No. 1c, collected during the most recent 14-day monitoring period. Provide in a TXT, CSV, XLS, or XLSX file format.

**ENCLOSURE 2**  
**STATEMENT OF CERTIFICATION**

Triton West LLC – Shell Portland Distribution Terminal  
3800 Northwest Saint Helens Road, Portland, Oregon 97210

**INFORMATION REQUEST**  
**STATEMENT OF CERTIFICATION**

I certify that the enclosed responses to EPA’s Information Request issued to Triton West LLC – Shell Portland Distribution Terminal are true, accurate and complete. I certify that the portions of these responses which I did not personally prepare were prepared by persons acting on behalf of Triton West LLC – Shell Portland Distribution Terminal under my supervision and at my instruction and that the information provided is true, accurate and complete. I am aware that there are significant penalties for submitting false information in response to this Information Request, including the possibility of fine and imprisonment.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date