

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 1

EPCRA, CERCLA, and CAA § 112(r) Inspection Report

Date: May 31, 2023

From: Len Wallace and Tyler Diercks, USEPA Enforcement Officers

Through: Mary Jane O'Donnell, Chief
Waste and Chemical Compliance Section

To: File

Subject: Chemical Accident Investigation and Inspection, under Clean Air Act (CAA) Risk Management Plan (RMP) Section 112(r) and General Duty Clause (GDC) Section 112(r)(1) and Emergency Planning and Community Right-To-Know Act (EPCRA) Sections 302-312, and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 103 of Inland Bridgeport Fuel Terminal, Bridgeport, CT

GENERAL INFORMATION

Facility Name: Inland Bridgeport Fuel Terminal
DUNS Number: 10146660
EPA Facility Identifier: 1000 0024 4292

Address: 71 Admiral Street
Bridgeport, CT 06605

Inspector Names: Len Wallace, EPA Region 1
Tyler Diercks, EPA Region 1
Sarah Biscardi, Eastern Research Group, Inc. (ERG)

Inspection Date: February 16, 2023

Type of Inspection: Risk Management Plan (RMP) CAA § 112(r), CAA § 112(r)(1) General Duty Clause (GDC), CERCLA § 103, and EPCRA §§ 302-313
Compliance Evaluation Inspection

Purpose of Inspection:

Inspection of the Inland Bridgeport Fuel Terminal facility for compliance with EPA CAA § 112I(1) General Duty Clause (GDC), § 112I(7) Risk Management Plan (RMP) Program, CERCLA § 103, and EPCRA §§ 302-312. The facility was selected for a routine inspection because it was identified by EPA headquarters as High-Risk facility, and it stores over 10,000 pounds (lbs) of propane onsite and is subject to CAA 112(r) RMP requirements.

Current Owner: Santa Energy, Inc.
Current Operator: Inland Bridgeport Fuel Terminal
Primary NAICS codes: 42471 – Petroleum Bulk Stations and Terminals

Number of Full-Time Employees (FTEs): 1

Estimated Annual Revenue: \$15.19M

Relationship to other firms, parent corporation, subsidiaries, and location of off-site facilities:
Inland Bridgeport Fuel Terminal facility is owned and operated by Inland Fuel Terminals, Inc., a subsidiary of Santa Energy Corporation.

GENERAL FACILITY DESCRIPTION

The Inland Bridgeport Fuel Terminal facility (the Inland Fuel Terminal or “Facility”) located in Bridgeport, Connecticut (CT) serves as an oil distribution terminal for the loading and unloading of #2 fuel oil, diesel, and kerosene for retail delivery. The Inland Fuel Terminal is bordered to the southeast by the Eastern Branch of Cedar Creek, to the northwest by Harbor Street, and to the north by Santa Fleet Services Gas Station. The office and the storage/maintenance portions of the facility are separated by Admiral Street. The facility is comprised of an office building, a vehicle garage building, a parking lot for fuel transfer vehicles, and seven above-ground storage tanks (ASTs). The Facility receives products via company tanker trucks, where material is unloaded into the bulk storage tanks, or via barges. Barges access the facility through Cedar Creek in the north portion of Black Rock Harbor in Long Island Sound. The barge loading dock can accommodate one vessel at a time at a maximum capacity of 35,000 barrels (approx. 1,500,000 gallons).

According to Facility representatives, Santa Energy started business in 1940 and the Inland Fuel Terminal site in Bridgeport has been operating since 1959. The Facility employs approximately 180 full-time employees, including a Facility Terminal Manager, truck drivers, office personnel, and various operations and maintenance personnel. The Facility operates 6 days a week for 9 hours per day from May to October, and seven days a week for 11 hours per day from November to April. There are two unions represented by employees at the Facility for truck drivers (Operating Engineers Local 478) and service members (Pipefitters 777).

The Facility is located in a primarily commercial and industrial area of Bridgeport, CT. There are residential areas to the east of the facility within 1,000 feet and Seaside Park is approximately 1,500 feet to the Southeast. The Connecticut Turnpike (I-95) runs east-west directly to the north of the facility. The Facility property is partially enclosed by fencing on the north, east, and south sides of the building, while the fence on the west side abuts the maintenance storage house and vehicle maintenance building. According to Facility personnel, there are multiple security cameras located around the Facility exterior and entry is limited to the Facility with keys fobs.

According to the Facility’s RMP submitted on June 24, 2020, the Facility stores 108,915 pounds (lbs.) of Propane onsite.

IN-BRIEF/OPENING CONFERENCE

The EPA inspection team, comprising Leonard Wallace and Tyler Diercks (EPA Inspectors), Sarah Biscardi (Eastern Research Group, Inc. [ERG] Contract Inspector) and John Burton Weston Solutions, Inc., entered the Facility at approximately 9:00 a.m. The inspection team presented identification to Stephen Santa, Director of Operations for Santa Energy, during the opening conference in the first-floor conference room of the administrative building. Jeremy Legendre, Terminal Manager for Inland Bridgeport Fuel Terminal, Sara Agosti, Safety Officer for Santa Energy, and Brian Leuasseur, Union Representative, also participated in the inspection representing the Facility.

Inspector Wallace conducted the opening meeting and explained the reason and scope of the inspection. Inspector Wallace presented the EPCRA Notice of Inspection to Mr. Santa, who signed as the Recipient of the Notice. Mr. Santa did not attempt to deny facility entry to the inspectors. Mr. Santa did not claim any information as Confidential Business Information (CBI).

Facility Representative:

Name	Title/Company	Phone Number	E-mail
Stephen Santa	Santa Energy – Director of Operations	(203) 770-3338	Santasb@santaenergy.com
Sara Agosti	Santa Energy – Safety Office	(475) 319-5669	agostis@santaenergy.com
Jeremy Legendre	Inland Fuel – Terminal Manager	(203) 913-2124	lengendrej@inlandfuel.com
Brian Leuasseur	Santa Energy – Operating Engineers Union Representative	(203) 906-0291	leuasseurb@santaenergy.com

Inspector Wallace shared the following guidance documents with facility representatives:

1. Guide to the Emergency Planning and Community Right-to-Know Act (Fall 2020)
2. EPCRA Quick Reference Fact Sheet (Fall 2020)
3. List of Lists (EPA 550-B-20-001, August 2020)
4. Small Business Resource Information Sheet (February 2020, EPA-300-F-20-002)
5. *National Response Center Oil and Chemical Spill Reporting* flyer
6. *Chemicals in Your Community* brochure (December 1999, EPA 550-K-99-001)

Inspector Wallace stated that after the opening meeting, the inspectors would do a walk-through inspection of the Facility's covered process and all other facility areas. He stated that the inspection team would be taking photographs of items and areas of interest and a copy of all photographs taken would be sent to the Facility representative after the inspection.

PHYSICAL INSPECTION

The EPA inspection team conducted a walk around of the following areas at the Inland Fuel Terminal:

1. Propane and Methanol Transfer Station
2. 30,000 Gallon Propane Tank Area
3. Maintenance House
4. Vehicle Shop
5. Petroleum Barge Transfer Dock and Dock House
6. Petroleum Tank Farm

7. Petroleum Vehicle Loading Rack Site

Inspector Wallace took a total of 92 digital photographs during the one-day inspection to provide reference documentation of conditions observed. The photographs are referenced throughout the document.

Propane and Methanol Transfer Station

The EPA inspection team toured the Propane and Methanol Transfer Station on the north side of the facility. On the same lot as the Santa Fleet Services Gas Station, the inspection team observed a small methanol tank and transfer equipment as well as a vehicle transfer pump for propane that connects directly to the 30,000-gallon propane tank. The EPA inspectors identified the following areas of concern based on the tour of the area:

- A lot across Cedar Creek was owned by the facility and used for storage of empty tanks and equipment (see Photograph P1120064). The Inspection Team did not tour this area owned by the Facility.
- The windsock at the north end of the property was less than three meters above the neighboring tank (see Photograph P1120063). Windsocks were not visible from all egress locations on-site.
- The methanol tank at the transfer station was not double-walled and lacked proper secondary containment. Additionally, this tank was not anchored to the ground (see Photographs P1120066 and P1120063).
- The methanol tank had flexible piping which could rupture if snow packing is pushed past the bollards and impacts the tank piping.
- The propane fill station did not contain proper bonding and grounding connections (see Photographs P1120067 and P1120069).
- Bollards are placed too close to the propane tank enabling vehicles to be parked within 10 feet of the tank (see Photograph P1120065).
- Valve connections on the propane and methanol transfer stations were not locked out to prevent tampering (see Photograph P1120065).
- The propane vapor lines did not contain a check valve (see Photograph P1120065).

30,000-Gallon Propane Tank Area

The EPA inspection team entered the fenced area around the 30,000-gallon Propane Tank from the northeast gate. Within this area was the tank and associated piping and equipment, two Bobtail loading systems, and smaller propane and other chemical tank storage containers. EPA inspectors identified the following areas of concern based on the tour of the area:

- Egress to the gate on the northeast corner of the fenced area is impeded by piping. Additionally, the gate lacked proper panic hardware (see Photograph P1120070).
- Smaller propane and other chemical tanks were being improperly stored within the fenced area of the 30,000-gallon Propane tank (see Photographs P1120061, P1120073, P1120074, and P1120075)
- Propane tanks stored within the fenced area were not properly labeled with the name of the stored chemical for immediate recognition of potential hazards (see Photographs P1120059 and P1120061).

- No fire protection system or deluge cooling system was present covering the propane tanks or transfer areas.
- Cages of chemicals within the fenced area were not properly labeled with contents and quantity (e.g., empty/full). Additionally, cages were not properly secured to the ground (see Photograph P1120073).
- Piping within the fenced area was not properly labeled (see Photograph P1120071).
- An oil drum and a methanol drum stored within the fenced area were not within secondary containment and were not provided proper grounding (see Photographs P1120073, P1120074, and P1120075).
- The propane exchange station on the south side of the fenced area did not contain proper quantity signage (see Photograph P1120076).
- Egress gates in the fenced area should be verified to be a minimum of 36 inches wide. Additionally, the egress gate to the southwest was not equipped with panic hardware.
- NFPA diamonds were not affixed to the entrance gates of the fenced area.
- Nitrogen tanks being stored at the foot of the 30,000-gallon propane tank were not provided appropriate separation distance from propane storage (see Photograph P1120079).
- Nitrogen tanks stored within the fenced area were not affixed with proper labeling (see Photograph P1120079).
- The saddle holding the 30,000-gallon propane tank, areas underneath the tank, and areas around the truck filling station were being used improperly for storage of parts (see Photographs P1120079, P1120080, and P1120085).
- The two buttons on the control panel required to perform an emergency shutoff for the 30,000-gallon propane tank were not properly labeled (see Photograph P1120079 and P1120082).
- The bottom side of the tank between the tank and the saddle was not properly painted and exhibited signs of accelerated rusting (see Photograph P1120083).
- The Bobtail Loading stations were not equipped with adequate bonding (see Photographs P1120085 and P1120086).
- It appears that bolts and zip ties were not loosened or removed during painting of piping and there is evidence of accelerated rusting under the wood/rubber spacer (see Photographs P1120089 and P1120090).

Maintenance House

The Inspection Team toured the outside of the Maintenance House before entering the garage portion of the House. Equipment and chemicals were stored in front of the Maintenance House. EPA inspectors identified the following areas of concern based on the tour of the area:

- A methanol intermediate bulk container (IBC) tote and 55-gallon drums were being stored outside of the Maintenance House both of which were not in secondary containment or provided with adequate bump protection to prevent impact from vehicles (see Photographs P1120091 and P1120097).
- Other drums and chemicals were stored outside of the maintenance house that were not in secondary containment or provided with adequate bump protection to prevent impact from vehicles, including an unsecured propane tank (see Photographs P1120092 and P1120096).
- A propane tank was identified to be attached to the maintenance house, and other chemicals and materials, including an oxygen tank were being stored in close proximity to the tank (see

Photographs P1120093 and P1120094). A secured 1-hour fire wall storage area was not provided for the oxygen tank.

- Improper storage of universal waste (batteries) was observed near the maintenance house and propane storage area (see Photograph P1120093).
- A propane tank cage was stored against the Maintenance House which does not allow for proper separation distance from the building. In addition, the propane tank cage was not affixed with appropriate quantity signage (see Photographs P1120095 and P1120096).
- The door to the Maintenance House does not provide adequate egress as the door opens inward and is not equipped with panic hardware (see Photographs P1120095 and P1120096).
- Chemical drums were stored in front of the maintenance house without proper secondary containment (see Photographs P1120096 and P1120097).
- Gas cans, propane tanks, and equipment with gasoline were improperly stored inside the maintenance storage shed (see Photographs P1120098, P1120099, and P1120102).
- Items were stored on the staircase in the maintenance storage shed, which could impede egress (see Photograph P1120098). Specifically, storage of wood in this area could create a fire hazard (see photograph P1120100).

Vehicle Shop

The inspection team toured outside the roll up door to the southeast of the vehicle shop before entering. The inspection team observed an operator actively transferring propane between two vehicles. Directly to the left of the roll up door was a 10,000-gallon diesel exhaust fluid (DEF) tank within a shed. The vehicle shop is used to service and maintain the Santa Energy Vehicle Fleet. It contained automotive maintenance tooling, equipment such as vehicle lifts, and chemicals such as oils and cleaning chemicals. EPA inspectors identified the following areas of concern based on the tour of the area:

- A liquid transfer operation between two trucks was being conducted outside of the vehicle maintenance garage on a non-impervious surface (see Photographs P1120104, P1120105, P1120106 and P1120107).
- Drums were stored outside of the vehicle maintenance garage that were not in secondary containment and were not properly labeled (see Photographs 54 and 55).
- A 10,000-gallon DEF tank was stored in a room next to the vehicle maintenance garage. The 10,000-gallon DEF tank was not affixed with proper labeling, including an NFPA diamond (see Photograph 56).
- Hoses were stored in the DEF tank room but were not labeled with proper status of hose per the Facility's hose inspection program (see Photograph 56).
- Secondary containment under a drum near the rear entrance of the vehicle maintenance garage appears to be leaking an oily fluid and was observed to contain unknown standing liquid (see Photographs 59 and 60).
- Storage areas within the vehicle maintenance garage are cluttered and pose a trip hazard (see Photographs 61, 62, and 63).

Petroleum Barge Transfer Dock and Dock House

The inspection team toured the Barge Transfer Dock and Dock House. Barges load and unload cargo using the transfer equipment that is controlled from the Dock House. This area is between Cedar Creek

and the Tank Farm. EPA inspectors identified the following areas of concern based on the tour of the area:

- An out of service tank near the barge unloading area was not properly labeled on all access sides (see Photographs P1120122 and P1120128).
- Piping on the barge unloading dock was not properly labeled (see s P1120123 and P1120124).

Petroleum Tank Farm

From the barge transfer area, the inspection team crossed the concrete containment on fixed platforms to enter the Tank Farm. There are two areas of the Tank Farm separated by a concrete containment wall. The eastern area of the Tank Farm contains 6 tanks: Tank 1 (263,000-gallon #2 fuel oil), Tank 2 (empty 15,000-gallon), Tank 3 (185,000-gallon #2 fuel oil), Tank 4 (186,700-gallon #2 fuel oil), Tank 5 (326,700-gallon #2 fuel oil), and Tank 7 (70,000-gallon kerosene). In the west containment area, there is Tank 6 (956,000-gallon #2 fuel oil). EPA inspectors identified the following areas of concern based on the tour of the area:

- The large tanks were not labeled with appropriate NFPA diamonds on all sides of approach to the tank farm (see Photographs P1120126, and P1120146).
- Piping within the tank farm is not properly labeled (see Photographs P1120131, P1120132, P1120133, P1120134, and P1120135).

Petroleum Vehicle Loading Rack Site

The inspection team toured the Vehicle loading area, where there is a covered loading rack, an office and storage shed, the containment boom compressor and storage area, additional tank storage, and a parking lot next to the Harbor Street exit. EPA inspectors identified the following areas of concern based on the tour of the area:

- Propane tanks were stored near the tanker loading area that did not contain proper full/empty signage (see Photograph P1120139).
- The air compressor for the boom did not provide proper signage for diesel fuel (see Photographs P1120139 and P1120140).
- There were no indications of recent inspection and testing of the hose connecting the air compressor to the boom (see Photograph P1120141).
- Drums were stored in the tanker loading area that were not on secondary containment (see Photographs P1120139 and P1120142).
- Oil additive was stored on a tray on top of a grey storage box. Site representatives noted that this box stored life jackets and other safety equipment (see Photographs P1120143 and P1120144).

OUT-BRIEF/CLOSING CONFERENCE

Inspector Wallace scheduled and concluded the inspection with a virtual out-brief Microsoft Teams meeting with facility representatives on March 16, 2023 and discussed the preliminary areas of concern identified during the inspection.

The following areas of concern were identified during the out brief and sent to the Facility via e-mail on March 16:

A lot across Cedar Creek was owned by the facility and used for storage of empty tanks and equipment. It was questioned if proper signage was in place to indicate empty tanks as well as directing visitors to the main site/office (see photograph P1120064).

The windsock at the north end of the property was less than three meters above the neighboring tank. Windsocks were not visible from all egress locations on-site (see photograph P1120063).

Smaller propane and other chemical tanks were being improperly stored within the fenced area of the 30,000-gallon Propane tank (see photographs P1120061, P1120073, P1120074, and P1120075).

Though the propane storage tanks had proper NFPA diamonds and CAS number identification, tanks should be labeled with the name of the stored chemical for immediate recognition of potential hazards (see photographs P1120059 and P1120061).

No fire protection system or deluge cooling system was present covering the propane tanks or transfer areas.

A methanol tank was identified in the vicinity of the propane storage and fill station area that was not double walled and lacked proper secondary containment. Additionally, the tank was not anchored to the ground (see photographs P1120066 and P1120068).

The methanol tank had flexible piping which could rupture if snow packing were pushed beyond the bollards and impacted the tank piping.

The propane fill station did not contain proper bonding and grounding connections (see photographs P1120067 and P1120069).

The bollards do not protect against cars parking within 10 feet of propane tank (see photograph P1120065).

Valve connections on the propane and methanol transfer stations were not locked out to prevent tampering. Though the propane line contained a check valve, there was no check valve on the propane vapor lines (see photograph P1120065).

Egress to the gate on the northeast corner of the propane storage area is impeded by piping and the gate lacked proper panic hardware. A bridge is required to allow appropriate egress (see photograph P1120070).

Cages of chemical within the propane storage area are not properly labeled with contents and empty/full information and are not properly secured to the ground (see photograph P1120073).

Piping within the propane storage fenced area was not properly labeled (see photograph P1120071).

An oil drum was stored within the propane storage fenced area that was not within secondary containment and was not provided proper grounding (see photographs P1120073 and P1120074).

A drum of methanol was stored within the propane storage fenced area that was not within secondary containment and was not provided proper grounding (see photographs P1120075).

Propane exchange station outside of the propane storage fenced area did not contain proper full/empty signage (see photograph P1120076).

Egress gates in the propane storage fenced area should be verified to be a minimum of 36 inches wide. Additionally, the egress gate to the southwest was not equipped with panic hardware.

NFPA diamonds were not affixed to the entrance gates of the propane storage fenced area.

Nitrogen tanks observed at the foot of the 30,000-gallon propane tank, which does not provide appropriate separation distance from propane storage (see photographs P1120079).

Nitrogen tanks stored within the propane storage fenced area were not affixed with proper labeling (see photograph P1120079).

The saddle holding the 30,000-gallon propane tank and areas underneath the tank were being used improperly for storage of parts (see photographs P1120079 and 1120080).

The control panel and emergency shutoff system for the 30,000-gallon propane tank included two buttons that were not properly labeled (see photographs P1120079 and P1120082).

The bottom side of the tank between the tank and the saddle was not properly painted and exhibited signs of accelerated rusting (see photograph P1120083).

Safety equipment (i.e., face shields and PPE) was being stored near the truck filling system (see photograph P1120085).

The truck filling system was not equipped with adequate grounding (see photographs P1120085 and 1120086).

It appears that bolts and zip ties were not loosened or removed during painting of piping and there is evidence of accelerated rusting under the wood/rubber spacer (see photograph P1120089).

A methanol tank was being stored outside of the maintenance house that was not in secondary containment or provided with adequate bump protection to prevent impact from vehicles (see photograph P1120091).

Other drums and chemicals were stored outside of the maintenance house that were not in secondary containment or provided with adequate bump protection to prevent impact from vehicles, including an unsecured propane tank (see photograph P1120092).

A propane tank was identified to be attached to the maintenance house, and other chemicals and materials, including an oxygen tank were being stored in close proximity to the tank (see photographs P1120093 and P1120094). A secured 1-hour fire wall storage area was not provided for the oxygen tank. Improper storage of universal waste (batteries) was observed near the maintenance house and propane storage area (see photograph P1120093).

A propane tank cage was stored against the maintenance house which does not allow for proper separation distance from the building. In addition, the propane tank cage was not affixed with appropriate full/empty signage (see photographs P1120095 and 1120096).

The door to the maintenance house does not provide adequate egress as the door opens inward and is not equipped with panic hardware (see photographs P1120095 and P1120096).

Chemical drums were stored in front of the maintenance house without proper secondary containment (see photograph P1120097).

Gas cans, propane tanks, and equipment with gasoline were improperly stored inside the maintenance storage shed (see photographs P1120098, P1120099, P1120102).

Items were stored on the staircase in the maintenance storage shed, which could impede egress (see photograph P1120098). Specifically, storage of wood in this area could create a fire hazard (see P1120100).

A liquid transfer operation was being conducted outside of the vehicle maintenance garage on a non-impervious surface (see photographs P1120104, P1120105, P1120106, and P1120107).

Drums were stored outside of the vehicle maintenance garage that were not in secondary containment and were not properly labeled (see photographs P1120108 and P1120109).

A 10,000-gallon tank containing diesel exhaust fluid (DEF) was stored in a room next to the vehicle maintenance garage. The 10,000-gallon DEF tank was not affixed with proper labeling (see photograph P1120110).

Hoses were stored in the DEF tank room but were not labeled with proper status of hose per the hose inspection program (see photograph P1120110).

Secondary containment under a drum near the rear entrance of the vehicle maintenance garage appears to be leaking an oily fluid and has standing unknown liquid within (see photographs P1120113 and P1120114).

Storage areas within the vehicle maintenance garage are messy and pose a trip hazard (see photographs P1120115, P1120116, and P1120117).

An out of service tank near the barge unloading area was not properly labeled on all access sides (see photograph P1120122).

Piping on the barge unloading dock was not properly labeled (see photograph P1120124).

The large tanks were not labeled with appropriate NFPA diamonds on all sides of approach to the tank farm (see photographs P1120125, P1120126, P1120127, and P1120131).

Piping within the tank farm is not properly labeled (see photograph P1120132).

Propane tanks were stored near the tanker loading area that did not contain proper full/empty signage (see photograph P1120139).

The air compressor for the boom did not provide proper signage for diesel fuel (see photograph P1120140).

There were no indications of recent inspection and testing of the hose connecting the air compressor to the boom (see photograph P1120141).

Drums were stored in the tanker loading area that were not on secondary containment (see photograph P1120142).

Oil additive was stored on a tray on top of a grey storage box. Site representatives noted that this box stored life jackets and other safety equipment (see photographs P1120143 and P1120144).

FACILITY COMPLIANCE STATUS AND ELEMENTS OF PROOF - EPCRA

EPCRA Section 302

(1) Does facility have on-site, at any one time, extremely hazardous substances (EHSs) at or above the TPQ? Unknown

(2) List or obtain documentation: The Tier 2 form does not account for all Lead acid batteries on site. See Photographs P1120077, P1120093, and P1120140 for batteries that are in trucks, generators, and universal waste.

(3) How was maximum quantity on-site determined or calculated? NA

EPCRA Section 303

(1) Facility Coordinator identified per Sec. 303 and date LEPC was notified? Terminal Manager and Facility Emergency Coordinator identified in RY2021 Tier II as Jeremy Legendre (submitted on 01/20/2022).

EPCRA Section 311

(1) Is facility required to maintain MSDSs under the OSHA Hazard Communication Standard 29 CFR 1910.1200 (no specific chemical list)? Yes

(2) Has the facility conducted a comprehensive audit to identify MSDS chemicals on-site and to determine if 500 lb./10,000 lb./TPQ thresholds were exceeded? Unknown

(3) List of OSHA chemicals manufactured, processed, used/stored, and obtained? Diesel Fuels, Unleaded Gasoline with 10% ethanol, Methanol, ODT-21 mj2, Propane, ULSD Fuel Inhibitor & Lubricant, Unisol® Liquid Red BK-50

(4) How were the maximum amounts determined? Unknown

Methanol was not correctly reported on Tier 2 form, we observe another 9 – 55-gallon drums and one 350 ICB Tote of methanol (See Photographs P1120075, P1120091, P1120093 and P1120097). This was another 5,592 pounds. 1 US gallon of methanol equals 6.6 pounds. The diesel exhaust fluid (DEF) 10,000-gallon tank did not appear on the Tier 2 form. DEF weighs approximately 9 pounds per gallon which is equal to 90,000 pounds.

(5) Section 311 info supplied to the:

SERC (Y/N): Unknown.

LEPC (Y/N): Unknown.

Local Fire Department(Y/N): Unknown.

Date Unknown.

Chemical List Unknown.
 MSDSs Unknown.

(6) Have any new hazardous chemicals, mixtures, or substances been introduced into the facility in the last 5 years? Unknown.

(7) If yes, has the facility submitted updated lists or SDSs? Unknown.

EPCRA Section 312 (due March 1 of year following reporting calendar year)

(1) Was Tier II form submitted for all required chemicals? Yes. We used the Tier 2 form submitted on January 20, 2022.

(2) What procedures are used to update Section 312 information for annual submittal and to ensure additional or new chemical data is submitted within 90 days? Unknown.

(3) Was facility aware of annual reporting requirements under Section 312? Yes.

(4) Had the facility completed and signed a list of all reportable chemicals on site on date of the inspection? Unknown.

(5) Table of EPCRA 312 Extremely Hazardous Substances above the Threshold Planning Quantity (based on Tier II reporting for RY2021):

CAS #	Chemical	Approx. Max. Wt. on Site (Lbs.)	TPQ (Lbs.)	Approx. Ratio (Actual/TPQ)
74-98-6	Propane	108,630	10,000	10.86
68476-34-6	DIESEL FUEL OIL	8,051,400	10,000	805.14
	ILFC Ten32 XL	6,770	10,000	.677
Lead CAS #: 7439-92-1 - 55% Sulfuric Acid CAS #: 7664-93-9 - 20%	Lead Acid Batteries (EHS - Sulfuric Acid)	100	Lead 10,000 Sulfuric Acid 1,000/500	.2
67-56-1	Methanol	2,080 Tank	10,000	.2
74-98-6	PROPANE	108,630	10,000	10.8
64742-53-6	UNISOL LIQUID RED B	2,400	10,000	.24

ENFORCEMENT HISTORY

There have been no other EPA inspections at the Inland Bridgeport Fuel Terminal in Bridgeport, CT in the past five years according to EPA’s Enforcement and Compliance History Online (ECHO) System. EPA’s ECHO System does not identify any historical noncompliance for the Inland Bridgeport Fuel Terminal in Bridgeport, CT.

ENVIRONMENTAL JUSTICE

EPA's ECHO System indicates that the Inland Bridgeport Fuel Terminal in Bridgeport, CT is in an area of Environmental Justice (EJ) interest based on 11 EJ Indices being above the 80th-percentile (national).

ATTACHMENT A

Google Earth Image of the Inland Bridgeport Fuel Terminal

