



**Region 6 - Enforcement & Compliance Assurance Division**  
**INSPECTION REPORT**

|                                        |                               |                    |
|----------------------------------------|-------------------------------|--------------------|
| Inspection Date(s):                    | 02/12/2024                    |                    |
| Media Program:                         | Air                           |                    |
| Regulatory Program(s)                  | Title V, NSPS, SIP            |                    |
|                                        |                               |                    |
| Company Name:                          | <b>Motiva Enterprises LLC</b> |                    |
| Facility Name:                         | <b>Port Neches Terminal</b>   |                    |
| Facility Physical Location:            | 100 E Port Neches Ave         |                    |
| (city, state, zip code)                | Port Neches, TX 77651         |                    |
| Mailing address:                       | 100 E Port Neches Ave         |                    |
| (city, state, zip code)                | Port Neches, TX 77651         |                    |
| County/Parish:                         | Jefferson County              |                    |
| Facility Phone Number                  | 409-835-5381                  |                    |
| Facility Contact:                      | Blake Yarbrough               | Complex Manager    |
|                                        | blake.yarbrough@motiva.com    |                    |
|                                        |                               |                    |
| FRS Number:                            | 110000599576                  |                    |
| Identification/Permit Number:          | RN100210103 / FOP O3277       |                    |
| Media Identifier Number:               | AFS # 48-245-00013            |                    |
| NAICS:                                 | 424710                        |                    |
| SIC:                                   | 5171                          |                    |
|                                        |                               |                    |
| Personnel participating in inspection: |                               |                    |
| James Haynes                           | EPA Region 6 ECDAT            | Physical Scientist |
| Ben Rosenthal                          | EPA Region 6 ECDAT            | Physical Scientist |
| Blake Yarbrough                        | Motiva Enterprises LLC        | Complex Manager    |
| Michael Brinkley                       | Motiva Enterprises LLC        | Terminal Manager   |
| Arles Zelayn                           | Motiva Enterprises LLC        | Operator           |
|                                        |                               |                    |
| EPA Lead Inspector<br>Signature/Date   |                               |                    |
|                                        | James Haynes                  | Date               |
|                                        |                               |                    |
| Supervisor<br>Signature/Date           |                               |                    |
|                                        | James Leathers                | Date               |

**Section I – INTRODUCTION****PURPOSE OF THE INSPECTION**

I, James Haynes, with Ben Rosenthal, EPA Region 6 inspectors, arrived at Motiva Enterprises LLC’s Port Neches Terminal (the “Facility”) at 16:00 on February 12, 2024, for an unannounced inspection. We met with Mr. Michael Brinkley, Terminal Manager, and Mr. Blake Yarbrough, Complex Manager. I presented my inspector credentials to Mr. Brinkley and informed him that this was an EPA inspection to evaluate the Facility’s compliance with the Clean Air Act (“CAA”). The scope of the inspection is a partial evaluation (“PCE”). This inspection occurred as part of a multi-scale monitoring project in the Beaumont-Port Arthur area. Photographs taken during the inspection can be found in Appendix 1.

**FACILITY DESCRIPTION**

The Port Neches Terminal is used for the storage and distribution of crude oil and other petroleum products.

**Section II - OBSERVATIONS**

During the opening conference, we discussed the Facility’s in-service internal floating roof (“IFR”) and external floating roof (“EFR”) storage vessels and marine loading operations. We informed the Facility that we would use a FLIR GF620, an optical gas imaging (“OGI”) camera, and TVA 2020, a flame ionization detector (“FID”), as part of the inspection.

We met with Arles Zelayn, an operator at the Facility, to begin our site tour. The following table is a summary of our observations:

| Tank # | Tank Contents                    | Design | Notes and Observations                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|--------|----------------------------------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 280    | Stormwater                       | IFR    | <ul style="list-style-type: none"> <li>No hydrocarbons emission observed with the OGI camera.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                              |
| 34030  | Debutanized Aromatic Concentrate | EFR    | <ul style="list-style-type: none"> <li>EPA inspectors noted hydrocarbon odors at the tank’s platform and along the circumference of the tank’s shell.</li> <li>EPA inspectors noted visual defects of gasket material of the tank’s guidepole hatch (Photo 1) and measured a concentration of 3,300 parts per million using the FID. <b>[AOC 1]</b></li> <li>Light hydrocarbon emission observed with the OGI camera at the base of the secondary rim seal. <b>[AOC 2]</b></li> </ul> |
| 1815   | Cyclohexane                      | IFR    | <ul style="list-style-type: none"> <li>No liquids on the floating roof.</li> <li>No hydrocarbon emissions observed with the OGI camera.</li> </ul>                                                                                                                                                                                                                                                                                                                                    |

|      |           |     |                                                                                                                                         |
|------|-----------|-----|-----------------------------------------------------------------------------------------------------------------------------------------|
| 1835 | Crude Oil | EFR | <ul style="list-style-type: none"> <li>Hydrocarbon emission observed with the OGI camera along the rim seal. <b>[AOC 2]</b></li> </ul>  |
| 1834 | Crude Oil | EFR | <ul style="list-style-type: none"> <li>No hydrocarbon emissions observed with the OGI camera.</li> </ul>                                |
| 275  | Crude Oil | EFR | <ul style="list-style-type: none"> <li>Hydrocarbon emissions observed with the OGI camera along the rim seal. <b>[AOC 2]</b></li> </ul> |

### Section III – AREAS OF CONCERN

I conducted a closing conference at 18:45 for the inspection with Mr. Yarborough and Mr. Brinkley. We summarized the observations, including the following Areas of Concern:

- 1) At Tank 34030, upon detecting hydrocarbon odors at the tank's platform, we observed the gasket material at the guidepole hatch was torn. Mr. Rosenthal also measured emissions with the FID and confirmed that emissions were emanating from the hatch near the torn gasket.
- 2) At Tanks 34030, 1835, and 275, we observed hydrocarbon emissions with the OGI camera along the rim seals indicating that the secondary seals may not be controlling emissions as required.

### Section IV – FOLLOW UP

EPA requested additional information following the inspection. On March 11, 2024, Motiva Enterprises LLC submitted responses to my request.

### Section V – LIST OF APPENDICES

Appendix 1 – Photograph Log

## Appendix 1

### Photograph Log



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 1

|                                                         |                   |           |
|---------------------------------------------------------|-------------------|-----------|
| Location: Motiva Enterprises LLC / Port Neches Terminal |                   |           |
| City: Port Neches                                       | County: Jefferson | State: TX |



|                  |                                                                                                                                |
|------------------|--------------------------------------------------------------------------------------------------------------------------------|
| Photo File Name: | FLIR0033.jpg                                                                                                                   |
| Date of Photo:   | 02/12/2024                                                                                                                     |
| Time of Photo:   | 17:21                                                                                                                          |
| Photographer:    | James Haynes                                                                                                                   |
| Description:     | Torn gasket material at hatch on Tank 34030. EPA recorded approximately 3,300 parts per million VOC, as methane, with the FID. |