



Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency
Region 10 – Seattle, WA

Partial Compliance Evaluation

Seaport Midstream Partners, LLC

Owned by TransMontaigne Partners, LLC

Portland Terminal

Inspection Date: June 24, 2024

Report Author Signature

Date

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EPA Region 10

Peer Review Signature

Date

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Date

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1. Basic Facility and Inspection Information

Facility Location: Seaport Midstream Partners, LLC
Owned by TransMontaigne Partners, LLC
Portland Terminal
9930 NW St. Helens Road
Portland, OR 97283

AFS Number: OR0000004105102030

Permit Number: Title V Operating Permit #26-2030-TV-01
Oregon DEQ

Facility Contact: Brian Hoyman – Terminal Manager
503-937-1686, bhoyman@transmontaigne.com

Agency Inspectors: Zach Hedgpeth, PE – EPA Region 10
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Andrew Gregory – EPA Region 10
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Dan Heins – EPA OECA
Steve Rapp – EPA OECA
Phil Myers – EPA NEIC

Weston Li – Oregon Department of Environmental Quality

Inspection: June 24, 2024

Inspection Report: August 29, 2024

Inspection Notice: Unannounced

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision regarding compliance with the Clean Air Act (CAA) and applicable regulations or permits, nor is it meant to be a comprehensive report of all activities and processes conducted at the facility.

2. Introduction

- a) This was a Clean Air Act (CAA) compliance inspection by the Environmental Protection Agency (EPA). The purpose of this inspection was to conduct a partial compliance evaluation (PCE) inspection of the facility. The inspection included a general discussion of facility operations, a visual walk-through including observations using FLIR GF320 infrared gas imaging cameras, and measurement of internal floating roof headspace using a QRAE 3 handheld gas detector capable of measuring lower explosive limit (LEL) in addition to the observations of the inspectors.
- b) Advance notice of this inspection was not provided to the facility.

3. Inspection Elements and Field Observations – June 24, 2024

- a) The EPA inspectors arrived onsite at approximately 13:30. Brian Hoyman, Terminal Manager, met us in the parking lot. A brief opening conference was held in the parking lot and nearby conference room.
- b) Opening Conference
 - 1. We were joined by Ian Kelley, Lead Operator at the facility. The EPA inspectors presented our credentials to facility staff at this time.
 - 2. I began the opening conference by explaining that we (EPA inspectors) were onsite to conduct an unannounced inspection under the Federal Clean Air Act (CAA). The inspection will be a PCE centering around emissions observations using the FLIR cameras and LEL measurements using the QRAE 3 detectors.
 - 3. Collection of photos, videos, FLIR infrared videos were discussed, and facility personnel expressed their agreement. I explained that copies of all recordings collected during the inspection would be transmitted to the facility along with the inspection report.
 - 4. Since some of the EPA equipment is not intrinsically safe, the facility required a hot work permit to be issued for the inspection work. Facility staff assisted to meet the necessary requirements.
 - 5. Confidential business information (CBI) was discussed, and I gave the EPA CBI forms to Mr. Hoyman. Facility personnel did not claim any information as CBI during the inspection.
 - 6. Mr. Hoyman and Mr. Kelley explained that the facility utilizes their marine loading equipment for diesel only, and that they received a shipment that morning. No further shipments are currently scheduled – the facility usually receives a few days notice regarding upcoming shipments. The facility also receives product by rail but does not ship via rail. Products received by rail include additives, biodiesel (B100), ethanol, and renewable diesel (RD99).
 - 7. Although the facility name is Seaport Midstream Partners, LLC, it is owned by TransMontaigne Partners, LLC. All product handled by the facility is owned by BP.
 - 8. The opening conference ended, and the group proceeded to the field at approximately 13:55.

c) Field Observations

1. Fieldwork began with a visual survey of the facility tanks using the FLIR cameras. Mr. Kelley accompanied the inspectors at the start of the fieldwork, and Mr. Hoyman joined later as we prepared to conduct LEL measurements on Tank 4 (discussed below).
2. As the group walked towards the tank farm, Inspector Myers observed the Vapor Combustion Unit (VCU) exhaust using a FLIR camera. Video 424 shows a plume of residual volatile organic compounds (VOCs) extending downwind from the VCU exhaust stack.
3. FLIR observations began in the northwest portion of the site, near Tanks 1, 12, and 13. Inspectors Myers and Gregory as well as myself operated the GF320 cameras in order to screen for visible emission sources during the inspection.
4. Visible emissions were observed from Tank 1 using the FLIR cameras. I recorded videos 1152 and 1153 and Inspector Myers recorded video 425 showing emissions from the rim vents (see Attachment 1).
5. During field observations, Mr. Kelley stated that Tank 1 is due for a seal inspection required under 40 CFR 63, subpart BBBBBB, and that this inspection is scheduled to occur in approximately 2 months.
6. The EPA inspectors conducted two measurements of the LEL on Tank 1. The measurements were conducted by lowering a teflon sampling line through the hatches in the north and south portions of the fixed roof to within approximately 1-2 feet above the floating roof in order to measure the concentration in the tank head space. All readings were recorded at 0% of the LEL over five minutes of monitoring in each hatch. The detailed data sheet is included as Attachment 3.
7. Visible emissions were observed from Tank 4 using the FLIR camera. Inspector Myers recorded video 427 showing emissions from the rim vents.
8. In response to my question on the topic, Mr. Kelley stated that Tanks 1, 4, and 8 have aluminum roofs, while all other tanks have steel roofs.
9. Visible emissions were observed from Tank 8 using the FLIR cameras. I recorded video 1154 and Inspector Myers recorded video 428 showing emissions from the rim vents.
10. As we started to climb Tank 4 with the intention of conducting LEL measurements, Mr. Hoyer approached the inspectors and expressed concerns regarding the LEL equipment and measurement technique being used. Mr. Hoyer stated that the facility has a policy that does not allow any plastic or PVC equipment on the tanks, and that all equipment must be metal and must be grounded to the tank. Mr. Hoyer stated that this is a safety concern for the facility. In response to Mr. Hoyer's concerns, I decided not to continue with the LEL monitoring, and the group returned to the facility conference room. The issue was discussed further, and the facility showed the inspectors a grounded tank gauge device that they use to lower into the tanks, suggesting we use something similar since it is metal and can be grounded to the tank. After

conferring with others within EPA regarding the issue, the decision was made not to continue monitoring LEL at this facility due to the facility concerns.

11. The inspectors next proceeded to observe truck loading at the loading rack using the FLIR cameras. Visible emissions were observed from a vapor recovery line at the connection point where the recovery line attached to a truck loading on Lane 1. I observed the truck driver, at the direction of facility staff, disconnect the vapor recovery line and replace the rubber seal/gasket on the adapter. After the gasket replacement, I did not observe any further emissions from this connection point. FLIR video 1155 in Attachment 1 shows the replacement of the rubber seal/gasket.
12. From the truck rack, I visually traced the vapor collection piping to the VCU using a FLIR camera. No visible emissions from the piping system were identified.
13. The inspectors completed the field portion of the inspection and returned to the facility conference room around 16:30.

4. Closing Conference – June 24, 2024

- a) The closing conference was held in the facility parking lot with Mr. Hoyer and Mr. Kelley. I provided a brief overview of the EPA Region 10 compliance process.
- b) The EPA records request (see Attachment 2) was reviewed and discussed. Mr. Hoyer agreed to provide the requested records within 30 days of the inspection.
- c) The following issues were identified as potential compliance concerns under the CAA. I clarified that these items did not necessarily constitute violations and may not include any additional compliance concerns that are identified post-inspection.
 1. Visible emissions were observed using the FLIR camera from Tank 1. It was noted that all LEL measurements on this tank were 0%.
 2. Visible emissions were observed using the FLIR camera from Tanks 4 and 8, noting that LEL was not measured on those tanks due to Mr. Hoyer's safety concern.
 3. Visible emissions were observed from a leaking vapor recovery line connection on Line 1 of the truck loading rack during the inspection, but the leaking connection point was repaired during the inspection.
- d) The closing conference ended around 16:45, and the inspectors departed the facility.