

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 1

EPCRA and CAA 112(r) Inspection Report

Date: November 22, 2022

From: Leonard Wallace/Drew Meyer, USEPA Inspectors

Through: MaryJane O'Donnell, Manager
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) 103 of Sea-3 Providence LLC, Providence, RI.

I. GENERAL INFORMATION

Facility Name: Sea-3 Providence LLC (Sea-3)

Address: 25 Fields Point Drive, Providence, RI 02905

RMP ID Number: 100000175981

DUNS Number: Unknown
Inspector Names:

Leonard B. Wallace IV, U.S. Environmental Protection Agency (EPA) Region 1
Drew Meyer, U.S. EPA Region 1
Tyler Nelson, Eastern Research Group (ERG)
John Burton, Weston Solutions, Inc. (Weston)

Inspection Date: August 17, 2022

Type of Inspection: CAA Section 112(r)/EPCRA Compliance Evaluation Inspection
Purpose of Inspection: EPA Section CAA 112(r)/EPCRA compliance evaluation inspection.

This report identifies observations and findings made by the EPA inspection team during the inspection with respect to compliance with the CAA Section 112(r) and EPCRA requirements.

Current Owner: Blackline Midstream LLC

Current Operator: Blackline Midstream LLC

Primary NAICS codes: 488999

Number of full-time employees: 10 FTEs

Estimated Annual Sales: NA

Relationship to other firms, parent corporation, subsidiaries, and location of off-site facilities:
The parent company is Blackline Midstream LLC.

Parent Corporation: Blackline Midstream LLC

II. GENERAL FACILITY DESCRIPTION

Sea-3 is located within the Providence, RI Pier. The Providence, RI facility was established in 2018 after the purchase of the idle Enterprise Providence Terminal by the parent company Blackline Partners LLC. The facility receives liquefied petroleum gas (LPG) at the pier via marine vessels. The LPG (propane) is offloaded and stored onsite in refrigerated storage tanks. Refrigerated propane is pressurized and transferred into pressurized storage tanks. When ready for transload, ethyl mercaptan is added to propane being transferred into trucks to odorize the propane being delivered. Trucks transport propane offsite. The facility can store up to 77 million pounds of propane and 15,000 pounds of ethyl mercaptan.

III. IN-BRIEF/OPENING CONFERENCE

The EPA inspection team consisted of Leonard Wallace, IV, EPA; Drew Meyer, EPA; Tyler Nelson, ERG; and John Burton, Weston. The inspection team entered the Facility at approximately 9:00 a.m. The inspection team presented identification to Mr. Konner Funkhouser during the opening conference in the office building. Inspector Wallace conducted the opening meeting and explained the reason for and scope of the inspection.

Inspector Wallace presented the EPCRA Notice of Inspection to Mr. Funkhouser, who signed as the Recipient of the Notice. The Facility did not attempt to deny Facility entry to the inspectors and did not invoke any claims of Confidential Business Information (CBI) for purposes of the inspection.

Facility Representatives:

Name	Title/Company	Phone Number	E-mail
Ryan Boyle	Terminal Manager	401-648-9159	Ryan.boyle@sea-3.com
Konner Funkhouser	Maintenance Supervisor	401-533-1072	Konner.funkhouser@sea-3.com

Other individuals present during the inspection included Andrew Palmer of Rhode Island Department of Environmental Management (RI DEM) and Nolan Labonne and Nick Easley of the U.S. Coast Guard.

Inspector Wallace shared the following guidance documents with Facility representatives:
Guide to the Emergency Planning and Community Right-to-Know Act (Fall 2020)

EPCRA Quick Reference Fact Sheet (Fall 2020)
List of Lists (EPA 550-B-21-001, April 2022)
Small Business Resource Information Sheet (February 2020, EPA-300-F-20-002)
National Response Center Oil and Chemical Spill Reporting flyer
Chemicals in Your Community brochure (EPA 550-K-99-001, December 1999)

Inspector Wallace stated that after the opening meeting, the inspectors would do a walk-through inspection of the propane pier operations, propane storage, mercaptan injection, the propane truck loading operations, and all outdoor equipment related to the safe operation of the Facility. He stated 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.

IV. PHYSICAL INSPECTION

General Inspection

The EPA inspection team conducted a walk around of the propane trans-loading areas including:

1. Propane Pier Unloading Station
2. Propane Storage Tanks
3. Mercaptan Injection
4. Truck Loading Area
5. Compressor Room

Mr. Wallace took a total of 214 digital photographs during the inspection to provide reference documentation of conditions observed. The photographs are referenced throughout the document.

General

The inspection team observed the following areas of concern applying to one or more areas of the facility:

- The facility had insufficient windsocks at all approaches to the facility to inform emergency responders and evacuating personnel of the prevailing wind direction.
- Some egress gates were observed to be locked without panic hardware (see Photographs P1090672-4, P1090677).
- An egress gate from the facility was observed to have less than 36 inches of clearance (see Photographs P1090672-4).
- The facility used a colored warning light beacon system, but the color of the visual alarms were inconsistent and the alarms were not labeled. For instance, a red beacon light was present along the main entrance, and blue, red, and green beacons were

present within the propane storage area, but there were no posted signs to indicate the meaning of these various colored alarm beacons. (See Photographs P1090681, P1090696, P1090700, P1090701, P1090702, and P1090785).

- The emergency stop buttons were not regularly tested.
- The natural gas generator located onsite did not have an NFPA diamond (see Photograph P1090795).
- Oil containers in the oil storage area did not have secondary containment (see Photograph P1090859).
- The oil storage container did not have an NFPA diamond (see Photograph P1090858).
- A small propane tank was found in the oil storage area and was not secured in a propane cage.

Propane Pier Unloading Area

Based on the tour of the propane pier unloading area, the inspection team observed the following area of concern:

- The marine loading arm hose was observed to show significant signs of wear. The ID number indicated it was brought into service on September 8, 2008 (see Photographs P1090819 - P1090824).

Propane Storage Tanks

Based on the tour of the propane storage tanks, the inspection team observed the following areas of concern:

- The drainage from the diked area discharged into an open area of the pier and not to a engineered outfall outfall (see Photographs P1090670, P1090675, and P1090678).
- Piping of all types were not properly labeled (see Photographs P1090703, P1090733). Pipes throughout the area were observed to be painted white and unlabeled, regardless of contents.
- Piping and valves showed signs of corrosion, heavy pitting, and rusting (see Photographs P1090723, P1090731, and P1090735).
- An unlabeled hose, identified as containing nitrogen was observed to be secured to electrical conduit with tape (see Photographs P1090702, P1090703, P1090704, and P1090706).

- Hand valves on propane transfer lines were found to be painted shut (see Photographs P1090723 - P1090724).
- Propane piping passed through the stairs on the propane storage tank, provided a situation that could lead to the pipe being stepped on (see Photograph P1090734).
- Part of the control box on the propane storage tank platform had been painted over (see Photograph P1090746).
- At the top of the refrigerated propane tank, the physical protection at the top of the stairs was bolted onto the sight glass line support (see Photographs P1090743 - P1090746, and P1090752).
- Several potential entry points of the refrigerated propane tank lacked confined space labels (see Photographs P1090730, P1090742, and P1090751).
- Ice buildup was present on liquefied propane lines. Ice was observed directly under insulation and frosted over valves (see Photographs P1090761 - P1090770).
- Liquefied propane pumps were not uniquely identified such that they could be identified by emergency responders (see Photograph P1090766).
- The methanol drum storage box was plastic and therefore had an unknown fire rating. The box also had the incorrect NFPA diamond (see Photographs P1090774 and P1090775).

Mercaptan Injection and Pressurized Propane Storage

Based on the tour of the mercaptan injection and pressurized propane storage, the inspection team observed the following areas of concern:

- The incorrect NFPA label was used on the ethyl mercaptan tank (see Photograph P1090802).
- A temperature gauge on a propane line was observed to be broken (reading >120°F) (see Photograph P1090804).
- Propane piping was not labeled (see Photographs P1090798, P1090799, P1090804, and P1090805).
- Black and blue 55-gallon drums were observed and were not identified with a description of its contents, and were not stored in secondary containment (see Photograph P1090829).

- The piping for the three ethyl mercaptan injectors was not protected from bumps (see Photographs P1090829, P1090830, and P1090833).

Truck Loading Area

Based on the tour of the propane truck loading stations, the inspection team observed the following areas of concern:

- There were no water cannons installed to service the pressurized propane overfill tank (see Photograph P1090839).
- Trucks may drive by the propane overfill tank, but no physical protection or bollards were installed on the facility interior side of the tank (see Photograph P1090839).
- The truck loading area only has one water cannon installed and has limited ability to move (see Photograph P1090839). There were no overlapping streams of water for trucks at the propane filling area.

Compressor Room

Based on the tour of the compressor room, the inspection team observed the following areas of concern:

- The flammable cabinets in the compressor building were not grounded (see Photographs P1090847 and P1090852).
- The compressor room doors was not equipped with panic hardware (see Photograph P1090848).
- The outdoor flammable shed had no NFPA diamond and some of the containers in the shed did not have secondary containment (see Photographs P1090858 - P1090860).

V. OUT-BRIEF/CLOSING CONFERENCE

Inspector Wallace held a virtual out-brief with Facility representatives on September 9, 2022, discussing the preliminary areas of concern identified during the inspection.

The following areas of concern were identified during the out brief:

- Facility was lacking windsocks at all approaches to the buildings and tanks to inform emergency responders and evacuating personnel of the prevailing wind direction.
- Drainage from the diked in area around refrigerated propane tank to offsite did not appear to be engineered to a dedicated outfall.
- Fencing around the refrigerated propane tank did not contain an egress along the dockside.

- Piping was not labeled throughout the facility.
- Piping of propane and other materials showed signs of corrosion with heavy pitting and rusting.
- Cabinets storing fire hoses were not marked.
- Egress gates were locked, not 36 inches wide, and did not contain panic hardware.
- Tanks were not correctly marked with NFPA signs.
- The red beacon light along main entrance sliding fence had no sign indicating the purpose of the beacon.
- Blue/red/green beacons were not marked with a sign indicating the purpose of each beacon.
- The Facility was not regularly testing the emergency stop buttons.
- Unlabeled nitrogen hoses were present without unique identifiers. A nitrogen hose was found secured to electrical conduit with tape.
- Hand-valves on propane line were painted shut.
- Electrical conduit and propane lines were observed to be both painted white and were not easily distinguishable.
- Propane piping passed through stairs on a large, refrigerated propane storage tank such that the pipe could be stepped on when using the stairs.
- Controls buttons on large, refrigerated propane storage tank were painted over. The purpose for these controls was not known at the time of the inspection.
- At the top of the large, refrigerated propane storage tank, the physical protection (guard) at the top of the stairwell was secured to the sight glass line.
- A large, refrigerated propane tank lacked confined space labels at potential entry points.
- Ice buildup was observed on liquid refrigerated propane lines. Ice was observed directly under insulation and frosted over valve.
- Inspectors observed plastic Jersey barriers protecting refrigerated liquid propane lines and pumps.
- Liquid refrigerated propane pumps were not uniquely identified.
- The methanol storage box was plastic.
- The methanol box had incorrect NFPA label posted.
- No NFPA diamond sign was present on the natural gas generator.
- The ethyl mercaptan tank has incorrect NFPA label.
- No physical protection on ethyl mercaptan tank.
- The temperature gauge on refrigerated liquid propane line was broken (reading >120°F).
- The Marine loading arm hose was worn, and ID number suggested installation date of 8 September 2008.
- No water cannon coverage existed for pressurized propane overfill tank.
- The truck loading area for pressurized propane had only one water cannon with limited movement.
- The piping and equipment in the ethyl mercaptan injection area was missing labeling.
- Inspectors did not observe physical protection around the pressurized propane overfill tank on interior side of facility.
- A flammable cabinet in the compressor room was not grounded.
- Compressor room doors were not equipped with panic hardware.

- Some of the oil containers inside a sea container did not have secondary containment and the containers to not have NFPA diamond signs.
- A small propane tank was observed in oil storage area and was not secured in propane cage.
- Inspector Wallace requested the Facility respond to the EPA within 10 days to describe their intentions and plan to correct the areas of concern identified during the inspection as described above.

VI. FACILITY COMPLIANCE STATUS AND ELEMENTS OF PROOF - EPCRA

EPCRA Section 302

- (1) Does Facility have on-site, at any one time, extremely hazardous substances (EHS) at or above the TPQ? No
- (2) List or obtain documentation: Inspection did not observe any EHSs
- (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? NA

EPCRA Section 311

- (1) Is Facility required to maintain SDSs 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 SDS 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? Ethyl Mercaptan, Propylene Glycol, Liquid Petroleum Gas (Propane), Nitrogen
- (4) How were the maximum amounts determined? 2021 Tier 2 and RMP
- (5) Section 311 info supplied to the:

SERC (Y/N):	<u>Yes</u>
LEPC (Y/N):	<u>Unknown</u>
Local Fire Department(Y/N):	<u>Unknown</u>
Date	<u>Unknown</u>
Chemical List	<u>Unknown</u>
MSDSs	<u>Yes</u>

- (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
- (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? Yes
- (5) Table of EPCRA 312 Reportable Substances:

CAS #	Chemical	Approx. Max. Wt. on Site (Lbs.)	TPQ (Lbs.)	Approx. Ratio (Actual/TPQ)
74-98-6	Liquefied Petroleum Gas (Propane)	79,732,800	10,000	7,900
75-08-1	Ethyl Mercaptan	17,493	10,000	1.7
7727-37-9	Nitrogen	34,136	10,000	3.4
57-55-6	Propylene Glycol	75,753	10,000	7.5

Reported on RY2021 Tier II report.
RMP 10/16/2019

VII. ENFORCEMENT HISTORY

The Facility has no reported violations in ECHO.

VIII. ENVIRONMENTAL JUSTICE

The national EJSCREEN mapping tool indicates that the Facility is located in area of Environmental Justice Indexes, Pollution and Sources, Socioeconomic Indicators for the Selected Area.