

United States Environmental Protection Agency (EPA) Region 4

Air Enforcement Branch

Inspection Report

I. GENERAL INFORMATION

Facility Name: Center Point Terminal Chickasaw

Location (Address): 200 Viaduct Road
Mobile, AL 36611

Inspection Date: April 22, 2021

Type of Inspection (Full or Partial Compliance Evaluation): Partial Compliance Evaluation

ICIS-Air Number: 04000EPAALCENTERPT

EPA Investigator(s)/Inspector(s): Steve Rieck, EPA Region 4
Environmental Scientist

Scott Hamilton, EPA Region 5
Environmental Engineer

Kate Haile, EPA Region 5
Environmental Engineer

State/Local Investigator(s)/Inspector(s): Katie Smith, ADEM
Environmental Scientist

Person(s) Contacted at Facility (Name and Title): Yojane Valera
Operations Manager

Report Prepared by: Steve Rieck

II. FACILITY INFORMATION

A. Facility and Permit Information

Facility and Permit Information	Comments
1. Type of facility (e.g., chemical plant, refinery, cement manufacturer, etc.).	Bulk liquid storage
2. Air permit number(s) and type of permit (e.g., Title V, PSD, Synthetic Minor, etc.).	Synthetic Minor Operating Permit Source Number #503-4007
3. Air permit issuance date.	July 20, 2016
4. Air permit expiration date.	No Expiration
5. Facility classification (Major, Synthetic Minor/Conditional Major, Minor).	Synthetic Minor
6. Major source pollutants (if applicable).	N/A
7. Applicable regulations (e.g., State Implementation Plan, MACT Subpart FFFF, NSPS Subpart EEEE, etc.).	NSPS Subpart K and Ka
8. Types of air emission points (e.g., tanks, process vents, boilers, etc.).	The primary focus of this inspection were asphalt storage tanks.
9. Types of air pollution control equipment (e.g., baghouse, scrubber, afterburner, etc.).	Storage tanks were equipped with fixed and internal floating roofs.

B. Process Description (provide narrative or attach description provided by the company or excerpts from the permit)

Center Point Terminal Chickasaw is a bulk liquid storage and transfer terminal for asphalt and related petroleum products. The facility receives asphalt by ship for storage. The received product is tested to ensure hydrogen sulfide in material does not exceed 10 parts per million. The

asphalt is kept in heated tanks to maintain the liquid phase of the material. Asphalt is loaded into heated trailer trucks for transfer or sale.

III. INSPECTION ACTIVITIES

Activity	Yes No NA	Comment
Opening Meeting	Yes	
1. Date and time entered the facility.		April 22, 2021, at 11:30 AM
2. Credentials presented to facility personnel (include name and title).	Yes	All inspectors presented their credentials.
3. Conducted an opening meeting to explain the purpose and objectives of the inspection.	Yes	EPA inspectors arrived on site and discussed inspection objectives with Mr. Valera. The purpose of the inspection was to determine compliance with Clean Air Act regulations, as well as to obtain ambient emission data through use of the Geospatial Measurement of Air Pollution (GMAP) mobile monitoring unit. The GMAP is a mobile air monitoring vehicle with analyzers for methane, benzene, toluene, ethylbenzene, xylene, and other VOCs. The GMAP allows for real-time monitoring and mapping of pollutants while the vehicle transverses the facility.
4. Discussed safety issues.	Yes	Inspectors discussed facility-specific safety and emergency procedures.
5. Discussed which records to be reviewed.	Yes	EPA inspectors did not review any records on-site.
6. Discussed the facility walk-through and the areas to be observed in the facility.	Yes	The Region 4 inspector will use an Optical Gas Imaging (OGI) camera to survey storage tanks. The Region 5 inspectors will operate the GMAP vehicle to measure ambient levels of various pollutants.
7. Discussed facility policy regarding photographs or video (if applicable).	Yes	Inspectors indicated that videos may be taken with the OGI camera and that copies of the video would be sent to the company.

8. Discussed the use of the infrared camera, TVA, PID, and any other equipment.	Yes	Inspectors discussed use of the OGI camera and the GMAP vehicle.
9. Discussed CBI.	Yes	Inspectors discussed that copies of videos or pictures taken with the OGI camera will be provided to the facility to determine whether they contain CBI.
Records Reviewed at the Facility		
10. The types of records reviewed and the time period reviewed.	No	Records were not reviewed at the facility.
Facility Walk-Through Observations		
11. The process equipment observed and the associated operational rate observed (e.g., Furnace 1 production rate was 5 lbs/hr on 1/1/15, at 2:00 pm – permit requires max rate at 6 lbs/hr). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	Yes	Inspectors used the OGI camera to survey storage tank operations and truck loading racks. The GMAP vehicle also measured concentrations of pollutants in the ambient air. A summary of the OGI camera survey is provided below. <u>Tank 10</u> Tank 10 stores liquid asphalt. The tank is kept heated at 300 degrees Fahrenheit to maintain the liquid phase. Visible emissions were observed from the central tank vent. <u>Tank 7</u> Tank 7 stores liquid asphalt in a heated tank. Visible emissions were observed from the central tank vent. Tank 7 will be taken out of service next year for a 10-year inspection. <u>Truck Loading Rack</u> Two trucks were loading liquid asphalt at the time of inspection. One truck was smoking excessively outside the truck top hatch. When asked, Mr. Valera said it was likely due to adding a comparatively cool additive to the hot liquid asphalt.

		The GMAP vehicle was stationary near some tanks as well as the loading rack to take ambient measurements of concentrations.
12. The type of process parametric monitoring observed and the associated value observed (e.g., Furnace 1 flux injection rate was 200 lbs/batch at 1/1/15, at 2:00 pm – permit requires max rate at 225 lbs/batch). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
13. If process equipment or parametric monitoring equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	
14. The type of air pollution control equipment, the process equipment it is controlling, and the associated parametric monitoring value observed (e.g., baghouse pressure drop, temperature, scrubber flow rate, etc.). (For example - RTO 1 controlling furnace 1, 1,500 degrees F on 1/1/15, at 2:00 pm – permit requires 1,400 degree F or higher).	Yes	Storage tanks observed on-site are equipped with fixed and internal floating roofs. The EPA inspector evaluated the condition of the tanks using the OGI camera. Facility staff indicated the tanks observed during the inspection undergo regular in-service inspections as well as an out-of-service full inspection every 10 years.

Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.		
15. Continuous emissions monitoring devices and values observed. (e.g., CEMS, COMs, etc.). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	No	
16. If air pollution control equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	
17. Capture and collection system (enclosures and hoods) observations, if applicable (e.g., the magnitude and duration of emission escaping capture from the hood).	N/A	
18. Ductwork transferring the emissions to the air pollution control device observations, if applicable (e.g., the magnitude and duration of emission escaping from the ductwork, holes or deterioration	N/A	

in ductwork, no deterioration observed, etc.).		
19. Any existing unpermitted emission points, new unpermitted emission points, or non-permitted construction activities observed. (if yes, describe in the comments field).	N/A	
20. Were any visible emissions observed? (if yes, identify the location and equipment).	No	
21. Was a Method 9 reading performed? (if yes, identify the location and equipment).	No	
22. Was the cause of the visible emissions investigated and the information documented?	N/A	
23. Was a Method 22 performed for visible emissions? (if yes, identify the location and equipment).	No	
24. Identify the cause of the visible emissions as explained by facility personnel, if applicable.	N/A	
25. Was the infrared camera used? If so, attach the video log (which includes the equipment ID, and the date and time the video was recorded) and videos to this report.	Yes	A video log is provided in Attachment A. A copy of the videos has been provided to the facility

26. Was the TVA used? If so, identify the equipment monitored and the results. Provide the date and time the information was recorded by the inspector. Include actual instrument readings for each piece of equipment monitored above the leak definition and/or where the infrared camera identified a release. An attachment may be used for a large amount of information.	No	
27. Was the PID used? If so, identify how the PID was used and the results. Provide the date and time the information was recorded by the inspector. An attachment may be used for a large amount of information.	No	
Closing Meeting		
28. Conducted a closing meeting.	Yes	The inspection team discussed findings with terminal staff in the parking lot including videos taken and next steps. The GMAP vehicle operators discussed preliminary observations of ambient pollutant data. The GMAP operators will make the data available following quality assurance and control review.
29. Summarize any additional information needed, if applicable?		
30. Accept a declaration of CBI, if applicable?	Yes	Facility staff will review OGI videos taken for any potential CBI.
31. Discussed observations.	Yes	Inspectors discussed equipment observed during the inspection and summarized what was observed with the OGI camera.

32. Discussed next steps, if applicable?	Yes	Inspectors discussed providing videos to the facility and a timeline for the inspection report.
33. Date and time inspection concluded.		The inspection team left the facility around 1: 30 pm.
Miscellaneous		
34. Include any additional observations, if applicable.		

EPA Investigator/Inspector Signature:

STEPHEN RIECK

Digitally signed by STEPHEN RIECK
Date: 2021.06.16 10:33:29 -04'00'

EPA Supervisor Signature & Title

JASON DRESSLER

Digitally signed by JASON DRESSLER
Date: 2021.06.16 14:26:53 -04'00'

Chief, North Air Enforcement Section

Date Report Finalized:

June 16, 2021