



Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	02/06/2024	
Media Program:	Air	
Regulatory Program(s)	NESHAP	
Company Name:	Valero Energy Partners	
Facility Name:	Port Arthur Products Station	
Facility Physical Location:	5300 Old W. Port Arthur Rd.	
(city, state, zip code)	Port Arthur, TX, 77640	
Mailing address:	5300 Old W. Port Arthur Rd.	
(city, state, zip code)	Port Arthur, TX, 77640	
County/Parish:	Jefferson County	
Facility Phone Number	409-984-3576	
Facility Contact:	Brad Guidry	Regional HSE Lead
	Brad.guidry@valero.com	
FRS Number:	110063167442	
Identification/Permit Number:	RN102027174 / 56342	
Media Identifier Number:	ICIS 3601631501	
NAICS:	486910	
SIC:	4613	
Personnel participating in inspection:		
Benjamin Donaldson	Region 6 ECDAT	Environmental Engineer
Kenneth McPherson	Region 6 ECDAT	Life Scientist
Justin Chen	Region 6 ECDAT	Environmental Engineer
Daniel Hoyt	OECA AED	Environmental Engineer
Nathan Hicks	OECA AED	Physical Scientist
Richard Helmich	NEIC	Chemist
Philip Myers	NEIC	Mechanical Engineer
Jody Lambright	Valero Energy Partners	Senior Area Manager
Aaron Lyons	Valero Energy Partners	Area Manager
Dustin Harris	Valero Energy Partners	Operations Manager
Brad Guidry	Valero Energy Partners	Regional HSE lead
Paul Cox	Colonial Pipeline Company	Senior Operator
Brian Willford	Colonial Pipeline Company	Safety Specialist
Ryan Tedford	Colonial Pipeline Company	Environmental Specialist
Gary Revia	Colonial Pipeline Company	Maintenance Supervisor
Curt Spell	Colonial Pipeline Company	Operations Supervisor
EPA Lead Inspector Signature/Date		
	Benjamin Donaldson	Date
Supervisor Signature/Date		
	James Leathers	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA inspectors Benjamin Donaldson (R6 ECDAT), Justin Chen (R6 ECDAT), Kenneth McPherson (R6 ECDAT), Daniel Hoyt (OECA AED), and Nathan Hicks (OECA AED) accompanied by Philip Myers and Richard Helmich (National Enforcement Investigations Center, “NEIC”) arrived at the Valero Energy Partners (“Valero”) Port Arthur Products Station at 8:32 AM on February 6, 2024, for an unannounced inspection. We met with Jody Lambright, Valero senior area manager, Aaron Lyons, Valero area manager, Dustin Harris, Valero operations manager, Brad Guidry, Valero regional HSE lead, Paul Cox, Colonial Pipeline Company (“Colonial”) senior operator, Brian Willford, Colonial safety specialist, Ryan Tedford, Colonial environmental specialist, and Gary Revia, Colonial maintenance supervisor. Credentials were presented to Ryan Tedford for Colonial and Jody Lambright for Valero and informed them that this was an EPA inspection to evaluate potential sources of excess emissions using EPA’s Geospatial Measurement of Air Pollution (“GMAP”) vehicle and evaluate compliance with the facility’s Federal Operating Air Permit and the Clean Air Act. The scope of the inspection is a partial compliance evaluation (“PCE”). This inspection occurred as part of a multi-scale monitoring project in the Beaumont-Port Arthur area. Photographs and video taken during the inspection can be found in Appendix 1 and 2, respectively. The sign-in sheet for the opening conference is attached as Appendix 3.

FACILITY DESCRIPTION

The Port Arthur Products Station is a tank storage terminal operated by Valero that operates under New Source Review Permit Number 56342 issued June 16, 2015. Colonial is also co-located within the Port Arthur Products Station.

Section II - OBSERVATIONS

The NEIC GMAP was driven by Mr. Helmich, the instruments were operated by Mr. Myers, and observed in the vehicle by Mr. Donaldson. Facility representatives Ryan Tedford, Jody Lambright, Brian Wilford, and Dustin Harris escorted the GMAP. Conditions were sunny and windy with winds from the north-northeast. Inspectors Justin Chen, Kenneth McPherson, Daniel Hoyt, and Nathan Hicks followed the GMAP in secondary vehicles. Daniel Hoyt and Nathan Hicks operated a Data Acquisition in Real Time (DART) unit on their vehicle, equipped with a photoionization detector (PID) that measures volatile organic compounds (“VOC”) in the air, and a wind monitor that monitors wind speed, wind direction and geolocation. The DART unit had a 10.6ev PID installed. The GMAP drove on all available facility roads measuring air pollutant concentrations downwind of each of the process areas, if possible. A full report from the GMAP will be issued by NEIC at a later date.

The GMAP detected elevated readings while downwind of Tank 2060. According to Mr. Lambright, Tank 2060 is a fixed roof tank, owned by Valero, and contains diesel fuel. Mr. McPherson operated an Optical

Gas Imaging Camera (“OGIC”) and observed emissions from the level gauge of Tank 2060 (R0010088.jpg, FLIR0002.mp4, FLIR0003.mp4). [AOC1]

The GMAP detected elevated readings while downwind of Tank 1372. According to Mr. Lambright, Tank 1372 is a fixed roof tank, owned by Valero, and contains diesel fuel. Mr. McPherson operated the OGIC and observed emissions from the dome of the fixed roof tank (FLIR0004.mp4, FLIR0006.mp4). [AOC 2]

The site GMAP survey ended at 11:15 AM and we returned to the conference room.

Section III – AREAS OF CONCERN

Benjamin Donaldson conducted a closing conference at the Valero Energy Partners Port Arthur Products station at 11:15 AM on February 6, 2024, for the inspection. Mr. Meyers and Mr. Donaldson summarized the facility tour and presented their emissions observations, including the following Areas of Concern. The facility made no claims of confidential business information regarding the photographs or videos. The facility was informed that copies of the videos would be made available to the facility following the inspection. We departed the facility at 11:38 AM.

- 1) Emissions observed from the level gauge of Tank 2060.
- 2) Emissions observed from the dome of the fixed roof for Tank 1372.

Section IV – FOLLOW UP

The following information was received by EPA on March 1, 2024, after exiting the Facility on February 6, 2024: The TCEQ RN for the facility is RN102027174 as well as an attached copy of the New Source Review Permit.

Section V – LIST OF APPENDICES

- Appendix 1 – Photo Log – 1 photo taken 02/06/2024
- Appendix 2 – Video Log – 4 FLIR videos taken 02/06/2024
- Appendix 3 – Opening and closing conference sign-in sheets

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Valero Energy Partners Port Arthur Product Station		
City: Port Arthur	County/Parish: Jefferson	State: TX



Photo File Name: R0010088.JPG
Date of Photo: 02/06/2023
Time of Photo: 10:10 am
Photographer: Kenneth McPherson
Description: Tank 2060

Appendix 2

Video Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Location: Valero Energy Partners / Port Arthur Products Station		
City: Port Arthur	Jefferson County	State: Texas



Video File Name: [FLIR0002.mp4](#)
 Date of Video: 02/06/2024
 Time of Video: 10:00 am
 Videographer: Ken McPherson
 Description: Emissions observed from Tank 2060 level gauge



Video File Name: [FLIR0003.mp4](#)
 Date of Video: 02/06/2024
 Time of Video: 10:05 am
 Videographer: Ken McPherson
 Description: Emissions observed from Tank 2060 level gauge



Video File Name: [FLIR0004.mp4](#)
 Date of Video: 02/06/2024
 Time of Video: 10:30 am
 Videographer: Ken McPherson
 Description: Emissions observed from the fixed roof dome of Tank 1372



Video File Name: [FLIR0006.mp4](#)
 Date of Video: 02/06/2024
 Time of Video: 10:30 am
 Videographer: Ken McPherson
 Description: Emissions observed from the fixed roof dome of Tank 1372

Appendix 3

Opening and Closing Conference Sign-in Sheets

OPENING CONFERENCE; Paul Cox Colonial 409-673-1663 Senior
Curt Spill CPC 409-466-3184 Ops
Brian Williford CPC 678-424-0020
RYAN TEDFORD CPC 881-900-7576
(ENVIRONMENTAL SPECIALIST)

Kenneth McPherson, Life Scientist, EPA 214-665-6754
Richard Helmrich, Chemist, EPA 303-462-9149
Nathan Hicks, Physical Scientist 865-898-0343
Phil Myers, Mechanical Engineer (303) 462-9301
Justin Chen, Env Engineer, EPA 214-665-2273
Ben Donaldson, Env. Engineer, EPA, 214-665-2675
Daniel Host Env Engineer EPI 202 564 7898
Jody Lambright - SR Area Manager Valero 409-673-7612
Gary Reza CPC - Tech Sup
Brad Gundry Regional HSE Lead Valero 409-799-4652
DUSTIN HARRIS OPERATIONS MANAGER CPC 409-300-2519
Aaron Lyons Area Manager Valero 409-798-0056
09:25 am end Conference

Closing Conference:

Kenneth R. McPherson, Life Scientist, EPA RL, 214-665-6754
Gary Reza, Colonial Pipeline, Maintenance Supervisor, 409-291-0619
Paul Cox Colonial Pipeline, Senior Operator, 409-673-1663
Philip Myers USEPA Mech. Engineer (303) 462-9301
Richard Helmrich EPA Chemist 303-462-9149
Nathan Hicks EPA Physical Scientist 865-898-0343
Aaron Lyons Valero, Area Manager 409-798-0056
Jody Lambright Valero, SR Area Manager 409-673-7612
Brad Gundry Valero Regional HSE Lead 409-799-4652
Justin Chen EPA Env Engineer 214-665-2273
Daniel Host EPA Env Engineer 202-564-7898
RYAN TEDFORD CPC Env. Specialist 881-900-7576
Lina Duncan CPC, Compliance Specialist 409-798-4288
DUSTIN HARRIS CPC OPERATIONS MANAGER 409-300-2519
Brian Williford CPC Safety Specialist 678-424-0020
Curt Spill CPC Ops Sup 409-466-3184
Ben Donaldson EPA ROG Env Eng. 214-665-2674
11:38 am - end Conference