RCRA Compliance Evaluation Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Chevron Port Everglades Terminal #1290175
1400 SE 24th St.
Fort Lauderdale, Florida 33335

County: Broward
Latitude: 26° 5' 31.1156"
Longitude: 80° 7' 43.1224"
EPA ID Number: FLD000611863

Primary NAICS: 424710 - Petroleum Bulk Stations and Terminals
SIC Code: 5171 - Wholesale Trade - Petroleum Bulk Stations and Terminals

3) Responsible Official

Gregory Smith, HSE Specialist, Chevron Port Everglades Terminal #1290175
GSJC@chevron.com
Phone: (925)- 348-1806

4) Inspection Participants

Parvez Mallick, US EPA Region 4
Romina Lancellotti, Florida Department of Environmental Protection (FDEP)
Juliana Reis, FDEP
Reinaldo Stevenson, Head Operator, Chevron Port Everglades Terminal #1290175
Gregory Smith, HSE Specialist, Chevron Port Everglades Terminal #1290175

5) Dates of Inspection

August 24, 2021, 10:00 a.m.

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

Florida Statutes (F.S.) Chapter 403.702 et seq., and the regulations promulgated pursuant thereto and set forth at the Florida Administrative Code (Fla. Admin. Code Ann. r.), Chapters 62-710, 62-730 and 62-750.

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

7) Purpose of Compliance Evaluation Inspection

On August 24, 2021, Romina Lancellotti and Juliana Reis, Florida Department of Environmental Protection (FDEP), and Parvez Mallick, U.S. EPA, conducted a routine compliance evaluation inspection of Chevron Port Everglades Terminal #1290175 (Chevron or the facility) to determine the facility's compliance with state and federal hazardous waste regulations. This was an EPA lead inspection. Chevron was represented by Mr. Gregory Smith, HSE Specialist, Chevron Port Everglades Terminal #1290175. Upon entering the facility, the inspectors introduced themselves, showed their credentials and explained the purpose of the visit and a description of the facility's process was discussed. The inspectors described the anticipated use of digital camera during the inspection. The inspectors briefly discussed the company's ability, pursuant to 40 C.F.R. § 2.203, to assert a business confidentiality claim for information submitted to EPA. The company did not assert a business confidentiality claim. The inspection participants also discussed health and

safety protocols and required personal protective equipment before Mr. Smith led the inspectors on a tour of the facility operations.

8) Facility Description

Chevron Port Everglades Terminal #1290175 is a bulk refined petroleum terminal of motor gasoline (87/93 octane), diesel fuel (high/low sulfur), ethanol, jet fuel (Type A), aviation gasoline (Avgas), and gasoline and diesel additives. The main office, loading racks and primary tank field is located at 1400 SE 24th Street (East Tank Farm). The other tank field is located at 900 SE 24th Street (West Tank Farm). Products are received via ship or barge from the Port Everglades Authority Docks, located to the east of the Terminal, at Berths #13 and #9. Additives are received by tanker truck, and tanker trucks are used to ship Transmix and product contact water (PCW).

Chevron Port Everglades Terminal site has been a petroleum terminal since 1920's and employs 6 employees. The terminal is tied to Miami International Airport (Aircraft Services International) by a pipeline handling jet fuel. The facility covers approximately a 19.2-acre area in an industrial development area and is connected to the city sewer and water system. The facility has 24 above ground storage tanks, and a total oil storage capacity in excess of 34,600,000 gallons. The facility is open for operation and manned 24-hours a day, 7 days per week.

There are seven pipelines from the dock to the Terminal, which consist of:

- 8-inch diameter: Aviation gasoline;
- 12-inch diameter: Diesel fuel;
- 12-inch diameter: Regular unleaded gasoline;
- 8-inch diameter: Supreme unleaded gasoline;
- 24-inch diameter: Jet Fuel A;
- 8-inch diameter: Petroleum Products/Water;
- 12-inch Diameter: Ethanol.

The facility originally notified FDEP as a large quantity generator (LQG) of hazardous waste on February 25, 1994, under the name Chevron USA Products Company #1290125 and was issued EPA identification number FLD000611863. The facility most recently notified FDEP as a LQG of hazardous waste on February 26, 2020 and retains EPA identification number FLD000611863. Hazardous wastes generated at the facility are batteries, carbon, tank bottoms, ethylene glycol, aviation fuel filters, paint waste, process water contaminated with fuel, oil/water/solids separation sludge, used oil, and absorbent contaminated with fuel.

9) Inspection Findings

The facility has two tank farms that are bulk petroleum and transfer facilities with above ground storage tanks encompassed by secondary containment dikes, a truck transfer loading rack with associated transfer pipelines from storage tanks, a warehouse/maintenance facility, a Test Room, and an office building. The facility inspection started at the East Tank Farm. The West Tank Farm was not inspected during August 24, 2021, inspection.

The facility has a series of underground drainage sumps that connect to a 10,000-gallon oil/water separator (OWS). This system also functions as emergency secondary containment for other facility operations. Tanker truck loading racks (TTLR) A and B areas in the East Tank Farm

field have French drains that feed into small, square underground sumps covered with mesh to trap solids (Photo #1). From there, water gravity feeds into a single, underground sump tank (S-1) with a capacity of 2,000 gallons and pumps drainage to the OWS. This large sump and the OWS are located within the East Tank Farm. The sump pump is activated by a high and high-high level alarm to automatically pump material from the sump tank to the OWS. The sump pump can also be activated manually. Additionally, the OWS has a high-level alarm that deactivates the sump pump. Recovered oil from the OWS is pumped to the transmix tank (T-42) and transmix is returned by tanker truck to the Pascagoula Refinery for recycling. Separated water from the OWS is pumped to the PCW tanks (T-43 and T-53) for storage and shipped off to Cliff Berry Inc. Miami plant (FLD058560699) for hydrocarbon recovery.

The jet fuel pipeline filter system consists of three clay filters in series with two paper filters. This system is maintained by the facility and is managed as non-hazardous waste. Sludges from the cleaning of tanks and the seperator are managed as hazardous waste and shipped off to Clean Harbors Deer Park, LLC (TXD055141378) for disposal.

During the inspection, the inspectors observed one open 5-gallon satellite container of hazardous waste in the Test Room. The container was open, had a funnel installed and an opening (Photo #2).

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

The inspectors inspected TTLR areas A and B located adjacent to the office. Five tanker trucks can load fuel simultaneously in the TTLR areas. During fuel loading a vapor recovery unit (VRU) hose is connected to the tanker to displace volatile organics. The VRU consists of two carbon adsorption vessels and ethylene glycol adsorption system in line. The spent carbon from the adsorption unit is handled as hazardous waste.

Spill kits, eye wash and shower stations, fire alarms, and fire extinguishers are available on-site. The facility conducts routine inspections, testing, and maintenance of all communications systems, fire protection equipment, spill control equipment, and decontamination equipment. The facility utilizes a two-way radio system for internal communications. Landlines were observed throughout the facility for external communication.

The Terminal is fully fenced in all areas where oil is handled or stored. Entrance gates to the facility are maintained closed and locked. The facility employees and certified drivers may gain access to the facility via a card-lock system and visitors may gain access through approved entry from facility employees. Entrance gates are locked unless opened via security access cards, for which Chevron controls the inventory and assignment of security access cards. Certified drivers can enter the facility at any time using a card-lock system for the entrance to the tanker truck loading rack.

Record Review

Hazardous waste shipping manifests for July 2018 to July 2021 were reviewed and found to be in compliance. A land disposal restriction notification is signed with each manifest. It appears that large quantity of hazardous waste is generated during episodic tank clean-out and maintenance. Other than tank clean-out and maintenance, lab wastes, fuel filters, and spill clean-up activities do not generate hazardous waste in amounts that warrant LQG status but Chevron has elected to notify and maintain the LQG generator requirements. At the time of inspection, the most recent pickup of hazardous waste had occurred on July 23, 2021; transported by Cliff Berry, Inc. (FLR000083071); the designated facility is Clean Harbors Deer Park, LLC. (TXD055141378). The facility transported one 5-gallon container of waste flammable liquids (methanol, xylenes) exhibiting characteristics of ignitability (EPA waste code D001) and spent non-halogenated solvent (EPA waste code F003).

Rather than weekly container inspection logs, the terminal operation maintains a Daily Tank Farm & TTLR inspection log that monitors all tanks, tank fields, drums and containers and initiates correction action, if necessary. The most recent weekly inspection was conducted on August 18, 2021. On October 8, 2021, the facility provided waste training records and position descriptions to the EPA and FDEP.

A review of contingency plan (CP) indicated that the CP is missing listing of all emergency equipment, the exact location within the facility, and brief outlines of the equipment capabilities. In addition, the facility did not have a quick reference guide (QRG) for review during the inspection. During the inspection, the inspectors instructed the facility to develop a QRG and amend the CP. Once the review of CP and QRG are completed by FDEP and the EPA, the updated CP and QRG must be submitted to the local emergency responders. On September 25, 2021, and October 8, 2021, the facility provided revised CP (updated on September 10, 2021) and QRG for review.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.261], and is a condition of the LQG Permit Exemption, a contingency plan must include the following: (e) The plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.262(b)], and is a condition of the LQG Permit Exemption, a large quantity generator that first becomes subject to these provisions after May 30, 2017 or a large quantity generator that is otherwise amending its contingency plan must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified at paragraph (a) of this section or, as appropriate, the Local Emergency Planning Committee.

Records review indicated that the most recent submittal of the updated CP to the local authorities was made on January 31, 2011. The inspectors informed the facility to submit a revised copy of CP along with a QRG to the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, and local hospitals. On October 8,

2021, Chevron provided receipts for mailing copies of the contingency plan to the EPA and FDEP. The revised CPs were sent to Broward County Fire Department, Broward County Sheriff Department, Marine Spill Response Corporation, Cliff Berry Inc., and Broward General Hospital.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17(a)(6)], which incorporates Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.256(a)], and is a condition of the LQG Permit Exemption, a LQG must attempt to make arrangements with the local police department, fire department, other emergency response teams, emergency response contractors, equipment suppliers, and local hospitals, taking into account the types and quantities of hazardous waste handled at the facility. Arrangements may be made with the Local Emergency Planning Committee, if it is determined to be the appropriate organization with which to make arrangements.

The facility's 2019 biennial report indicated that the facility did not generate any hazardous waste during 2019 calendar year. However, the inspector discovered that the facility generated and disposed of hazardous waste during 2019 calendar year. Additionally, the facility failed to submit the biennial report for 2017. The FDEP inspector instructed the facility representative to contact the Biennial Report State Coordinator Ms. Tracey Austin at tracey.austin@floridadep.gov to amend the 2019 biennial report and submit the 2017 biennial report. In a September 7, 2021, letter to FDEP, Mr. Gregory Smith indicated that Mr. Kwame Ohene Awuku, Chevron's Environment and Waste Advisor, will work with Ms. Austin at FDEP to correct the issues with the biennial reports for the Chevron Port Everglades terminal.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.41(a)] and is a condition of the LQG Permit Exemption, a generator who is a large quantity generator for at least one month of an odd-numbered year (reporting year) who ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States must complete and submit EPA Form 8700-13 A/B to FDEP by March 1 of the following even numbered year and must cover generator activities during the previous year.

10) Closing Conference

A closing conference was conducted at the conclusion of the inspection. Mr. Reinaldo Stevenson and Mr. Gregory Smith participated in the closing conference. The observations made during the inspection were discussed and the inspection was concluded. Chevron was inspected as a large quantity generator of hazardous waste.

11) Signed

PARVEZ MALLICK

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Date: 2021.10.08 12:41:08 -04'00'

Parvez Mallick
Inspector and Author of Report

Date

12) Concurrence and Approval

ARACELI CHAVEZ

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Date: 2021.10.08 13:18:09 -04'00'

Araceli B. Chavez
Chief
RCRA Enforcement Section

Date

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Compliance Evaluation Inspection photos taken by Romina Lancellotti, FDEP
(Nikon Coolpix W150 Waterproof Digital Camera)

Photo #1 – Tanker truck loading rack (TTLR) area.

Photo #2 – An open 5-gallon satellite container of hazardous waste in the Test Room.