



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 28 2018

REPLY TO THE ATTENTION OF

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Tom Gaal, Terminal Manager
Zenith Energy Terminals
250 Mahoning Ave.
Cleveland, Ohio 44113

Re: Finding of Violation
Zenith Energy Terminals
Cleveland, Ohio

Dear Ms. Stevens:

The U.S. Environmental Protection Agency is issuing the enclosed Finding of Violation (FOV) to Zenith Energy Terminals (Zenith or You) under Section 113(a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(3). We find that you are violating the New Source Performance Standards for Storage Vessels for Petroleum Liquids, 40 C.F.R. Part 60, Subpart Kb at your Cleveland, Ohio facility.

Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the FOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the FOV prior to the conference date.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Luke Hullinger. You may call him at (312) 886-3011 to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,



for Edward Nam
Director
Air and Radiation Division

Enclosure

cc: Bob Hodanbosi, Chief, Division of Air Pollution, Ohio EPA
James Kavalec, Environmental Manager, Division of Air Pollution, Ohio EPA
David Hearne, Division of Air Quality, Cleveland Department of Public Health

4. On April 8, 1987, EPA promulgated the Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 at 40 C.F.R. Part 60, Subpart Kb (hereinafter “Subpart Kb”). *See* 52 Fed. Reg. 11429 (Apr. 8, 1988), and 40 C.F.R. §§ 60.110b – 60.117b.

5. Subpart Kb at 40 C.F.R. § 60.111b defines “storage vessel” to mean each tank, reservoir, or container used for the storage of volatile organic liquids (VOLs) (with exceptions that are not applicable here).
6. Subpart Kb applies to each storage tank with a capacity greater than or equal to 75 cubic meters (m^3) that is used to store VOLs for which construction, reconstruction, or modification is commenced after July 23, 1984. 40 C.F.R. § 60.110b(a).
7. Subpart Kb at 40 C.F.R. § 60.112b(a) specifies the volatile organic compound (VOC) standard for storage tanks with a design capacity greater than or equal to 151 m^3 , containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kilopascals (kPa) but less than 76.6 kPa.
8. To comply with 40 C.F.R. § 60.112b(a), subject storage tanks must be equipped with a fixed roof in combination with an internal floating roof, and, as such, are required to meet the specifications identified under 40 C.F.R. § 60.112b(a)(1).
9. Pursuant 40 C.F.R. § 60.112b(a)(1)(ii), tanks with a fixed roof used in combination with an internal floating roof must be equipped with one of three types of closure devices between the wall of the storage vessel and the edge of the internal floating roof. Among the options for closure devices the regulation provides that two seals may be mounted above one another so that each seal forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. *See* 40 C.F.R. § 60.112b(a)(1)(ii)(B).
10. Pursuant to 40 C.F.R. § 60.112b(a)(1)(vi), tanks with fixed roofs used in combination with an internal floating roof must have rim space vents equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer’s recommended setting.

Findings and Violations

11. Zenith owns and operates a bulk petroleum terminal at 250 Mahoning Avenue, Cleveland, Ohio.
12. Zenith owns numerous storage tanks, including three internal floating roof storage tanks labeled Tank 120, Tank 121, and Tank 122 (or T013, T014, and T015, respectively, in the facility’s Ohio Environmental Protection Agency Permit-to-Install and Operate) that store gasoline.
13. Tank 120, Tank 121, and Tank 122 were converted into floating roof storage tanks in March 2001, September 1986, and September 1986, respectively, and were therefore modified after July 23, 1984. These three tanks also have a design capacity greater than 151 m^3 and are used to store gasoline, a VOL that, as stored, has a maximum true vapor

pressure greater than or equal to 5.2 kiloPascals (kPa) but less than 76.6 kPa. Therefore, Tank 120, Tank 121, and Tank 122 are each subject to the requirements of Subpart Kb.

14. Tank 120, Tank 121, and Tank 122 each utilize two seals intended to form a continuous closure between the wall of each tank and the edge of the tank's internal floating roof.
15. During the August 2018 Inspection, facility personnel informed the EPA inspectors that Tank 120, Tank 121, and Tank 122 were storing gasoline. An EPA inspector then recorded forward looking infrared radiometer (FLIR) video of emissions leaking from the rim vents of Tank 120, Tank 121, and Tank 122 at the time the internal roof in each tank was floating because gasoline was stored inside the tanks.
16. Zenith violated 40 C.F.R. § 60.112b(a)(1)(ii)(B) by failing to equip the internal roofs of Tank 120, Tank 121, and Tank 122 with two seals that form a continuous closure around the circumference of the tank, and/or Zenith violated 40 C.F.R. § 60.112b(a)(1)(vi) by setting the rim vent gasket of Tank 120, Tank 121, and Tank 122 to open when the internal roof was floating.
17. By failing to operate and maintain the facility's air pollution control system in accordance with good air pollution control practices, Zenith violated and continues to violate 40 C.F.R. § 60.11(d).

Environmental Impact of Violations

18. VOCs, along with nitrogen oxides (NO_x), are major precursors in the formation of atmospheric and ground-level ozone, a photochemical oxidant associated with a number of detrimental health effects, including birth defects and cancer, and environmental and ecological effects. In the presence of sunlight, and influenced by a variety of meteorological conditions, VOCs and hazardous air pollutants react with oxygen in the air to produce ozone. Although ozone's precursors are naturally occurring in the environment, their existence is greatly enhanced in and around urban areas, such as Cleveland, by anthropogenic contributions.

Date

12-28-2018

For

Sara Brunema

Edward Nam

Director

Air and Radiation Division

CERTIFICATE OF MAILING

I certify that I sent a Finding of Violation, No. EPA-5-18-OH-03, by Certified Mail,

Return Receipt Requested, to:

Tom Gaal, Terminal Manager
Zenith Energy Terminals
250 Mahoning Ave.
Cleveland, Ohio 44113

I also certify that I sent copies of the Finding of Violation by email to:

Bob Hodanbosi, Chief
Division of Air Pollution Control
Ohio Environmental Protection Agency
bob.hodanbosi@epa.ohio.gov

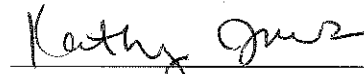
and

James Kavalec, Environmental Manager
Division of Air Pollution Control
Ohio Environmental Protection Agency
james.kavalec@epa.ohio.gov

and

David Hearne
Division of Air Quality
Cleveland Department of Public Health
dhearne@city.cleveland.oh.us

On the 28th day of December 2018.



Kathy Jones
Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7017 0530 0000 6289 2167

Case Name: Zenith Energy Terminals

Engineer/Scientist: Luke Hullinger and Kenneth Ruffatto Date: December 17, 2018

**REGION 5 AIR AND RADIATION DIVISION
CHECKLIST TO ACCOMPANY
NOTICE OF VIOLATION/FINDING OF VIOLATION**

PART A: NOV/FOV Checklist (to be completed prior to issuance of NOV/FOV)

Section I: Company Data and Financial Information

1. Name and address of violating source:

Zenith Energy Terminals, 250 Mahoning Ave., Cleveland Ohio

2. Dun and Bradstreet and/or other financial information about the owner/operator of the violating source has been obtained:

2a. ☐ Yes. Attach this information to this checklist.

2b. ☐ No. Explanation: Explain why this information is unavailable

3. The violating source has the following NAICS Code: 424710

4. The approximate number of employees at the company who owns/operates the violating source is as follows:

15

Utilize the information in BOX 3. and BOX 4., along with the SBA Size Standards to determine whether owner/operator of the violating source:

5. ☐ is a Small Business; if this box is checked, include Small Business Fact Sheet

6. ☒ is not a Small Business.

Is information regarding the owner/operator's net worth (corporations) or net current assets (partnerships and sole proprietorships) available on Dun and Bradstreet, or other publicly available source (e.g., company website, SEC filings, etc.)?

7. ☒ Yes, the owner/operator's net worth/net current assets are: The parent company has done \$105M in sales.

8. ☐ No. Fill out BOX 66.

Section II: Violations and Evidence

9. Violating Operation(s): Describe operations at the facility and provide a detailed description of the specific violating source, any pollution controls in use, and estimated emission rates (if applicable). **Optional:** attach diagrams or photographs as necessary.

The company stores liquid petroleum products and redistributes them.

The violation(s) involve the following pollutants (check all that apply):

Criteria Pollutants	Attainment Status (see <u>EPA Greenbook</u>)
10. ☒ VOCs	Ozone: ☐ Check if Nonattainment
11. ☐ PM/PM ₁₀ /PM _{2.5}	PM ₁₀ : ☐ Check if Nonattainment PM _{2.5} : ☐ Check if Nonattainment
12. ☐ SO ₂	SO ₂ : ☐ Check if Nonattainment PM _{2.5} : ☐ Check if Nonattainment
13. ☐ NO _x	NO ₂ : ☐ Check if Nonattainment ¹ PM _{2.5} : ☐ Check if Nonattainment Ozone: ☐ Check if Nonattainment
14. ☐ Lead	Lead: ☐ Check if Nonattainment
15. ☐ CO	CO: ☐ Check if Nonattainment ²

16. ☐ Organic HAP(s)³: List organic HAPs of concern

17. ☐ Metal HAP(s)

18. ☐ Ozone-Depleting Substance(s) (ODS)

19. ☐ Greenhouse Gas(s) (GHG)

20. ☐ Other: List other pollutants not otherwise specified above

¹ As of December 2014, there were no NO₂ Nonattainment Areas in Region 5.

² As of December 2014, there were no CO Nonattainment Areas in Region 5.

³ If many organic HAP constituents are present, it is only necessary to list the two or three in the highest concentration. Similarly, it is not necessary to list organic HAP constituents present in trace amounts.

The source violated the following regulation(s) (check all that apply):

21. ☐ SIP [CAA 110]
21A. ☐ Violation of federally enforceable state construction permit, operating non-Title V permit or FESOP
22. ☒ NSPS [CAA 111] List Subpart(s) in 40 CFR Part 60
23. ☐ Part 61 NESHAP [CAA 112] List Subpart(s) in 40 CFR Part 61
24. ☐ Part 63 NESHAP [CAA 112] List Subpart(s) in 40 CFR Part 63
25. ☐ PSD [CAA 165 - 169] (fill out Box 47.)
26. ☐ Nonattainment New Source Review [CAA Title I, Part D] (fill out Box 47.)
27. ☐ Ozone-Depleting Substances [CAA Title VI]
28. Title V Permitting Requirements:
28A. ☐ Failure to timely apply for a Title V Permit or Title V renewal
28B. ☒ Violation of Title V permit condition
29. ☐ Other: List other CAA provisions violated by source

Were any of the following used as evidence to establish a cited violation? (click all that apply):

30. ☐ Stack test results: Specify EPA Reference Method(s) or ASTM test method(s)
31. ☐ Method 9 Readings (attach Log Sheet)
32. ☐ Observations/measurements during inspection (attach Inspection Report)
33. ☐ CEMS data or ambient air quality monitoring data (attach data summary)
34. ☐ Emissions calculations
35. ☐ Other documents (e.g., 114 Response)

Was other credible evidence (i.e., a method other than that provided by the applicable rule) used to establish or support any violations set forth in the NOV/FOV?

36. ☒ Yes. FLIR video of hydrocarbons leaving rim vents and instrumentation on tanks.
37. ☐ No.

Does any violation cited in the NOV/FOV constitute an “emissions violation?” (i.e., a violation of any emission limitation, emission standard, parameter that is a surrogate for emissions, or other violation that resulted in excess emissions that lasted, or is expected to last more than 7 days [168 hours, either consecutive or non-consecutive].)

38. ☒ Yes. The leaking tanks lead to excess unaccounted for emissions leaving the tanks
39. ☐ No.

Does any violation cited in the NOV/FOV constitute “interference?” (i.e., a violation that involves work practices, testing requirements, monitoring requirements, recordkeeping or reporting that substantially interferes with enforcement or a determination of the source’s compliance.)

40. ☐ Yes. Briefly explain this determination
41. ☒ No.

Is any violation cited in the NOV/FOV (check all that apply):

42. ☒ Continuous in nature, and currently on-going;
43. ☐ Intermittent in nature, and likely to recur;
44. ☐ Concluded and unlikely to recur

45. Provide the starting date(s) and ending date(s) of each violation occurring within the past 5 years along with the number of days of each occurrence. For continuing violations, mark “on-going” for the ending date. For intermittent violations, you may list multiple starting and ending dates.

Violation Designation	Start Date	End Date	Number of Days
Leaking rim vents on tanks 120, 121, and 122	8/29/2018	present	
Leaking instrumentation on Tank 190	8/29/2018	present	

46. Provide a narrative description of the violations. Discuss all evidence used to support the violations. Provide attachments as necessary.

1. Zenith violated 40 C.F.R. § 60.112b(a)(1)(ii)(B) by failing to equip the internal roofs of Tank 120, Tank 121, and Tank 122 with two seals that form a continuous closure around the circumference of the tank, and/or Zenith violated 40 C.F.R. § 60.112b(a)(1)(vi) by setting the rim vent gasket of Tank 120, Tank 121, and Tank 122 to open when the internal roof was floating.
2. Pursuant to Section C.11.b)(2)b. of Zenith’s Permit, all openings on Tank 190, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

47. If BOX 25. or BOX 26. is checked: Provide list of all projects, and the date of each project alleged to have triggered PSD or NANSR. For each project and each triggering pollutant, provide detailed emission calculations that demonstrate the increase exceeded applicable thresholds. List all assumptions, emission factors, and the source of all data used in making emission calculations. Provide attachments as necessary.

Provide PSD/NSR emission calculations

48. Identify and describe anticipated defenses and any potential problems with the case (e.g., issue with evidence, issue with differing state/federal interpretations, pending rule changes, etc.).

The company could say the seals were checked and they did the required seal checks and that the FLIR camera was not detecting VOCs.

49. Describe EPA’s position/rebuttal with regards to the items identified in BOX 48.

Attorney-Client Privileged
Enforcement Sensitive – FOIA Exempt
Document Does Not Contain CBI

The violation is for open rim vents and still constitutes a violation. There was a nitrogen blanket on the methanol tanks, but the violation is for not keeping a closure.

Attorney-Client Privileged
Enforcement Sensitive – FOIA Exempt
Document Does Not Contain CBI

Section III: ETS

An NOV Record has been created in ETS.

50. ☐ Yes

Section IV: Attachments

51. List all attachments to this checklist here:

Inspection report

CONTINUE ON TO PART B

PART B: Administrative Case Management Plan Checklist (to be initiated prior to 113 Conference, and completed as information is available)

Section V: Administrative vs. Judicial

Is this case an Administrative Action or a Civil Judicial Action?

52. ☒ **Administrative⁴** (Skip to *Section VII*. Optional: Fill out *Section VI*)
53. ☐ **Judicial** (STOP, PART B is only for Administrative cases)
54. ☐ **Do not know yet** (Fill out *Section VI*)

Section VI: Injunctive Relief

Is the facility currently in compliance?

55. ☐ **Yes** (Go to *Section VII* you may skip the rest of *Section VI*)
56. ☒ **No** (Go to the next line)

Do you know the injunctive relief necessary for the source to comply?

57. ☒ **Yes:** Repair floating roofs, follow-up inspection, additional monitoring for a year.
58. ☐ **No:** Skip to BOX 62.

Will the company agree to perform the action(s) listed in BOX 57. within one year?

59. ☐ **Yes** (This case is Administrative. Skip to *Section VII*)
60. ☐ **No** (This case is Judicial, STOP)⁵
61. ☐ **Maybe/Don't know yet** (Skip to BOX 63.)

62. (If BOX 58. is checked) List questions that must be answered to determine the injunctive relief necessary to bring the violating unit(s) into compliance. Consider asking company for this information during the 113 Conference:

List questions or steps necessary to determine injunctive relief here, if applicable

62A. Date by which the company will provide this information: Click arrow to enter date

63. (If BOX 61. checked) ☐ Inform company either orally or in writing that injunctive relief must be completed within one year to return to compliance. Obtain deadline for response. (If company will not agree to perform necessary injunctive relief, or cannot perform the actions in one year, then case is Judicial, STOP.)

⁴ Administrative cases are generally: a.) penalty-only cases or b.) cases where the company will agree, through an Administrative Consent Order (ACO), to complete the injunctive relief necessary for compliance within one year. See also footnote 5.

⁵ In certain situations, obtaining injunctive relief over a period longer than one year may be available through a Section 113(d) Order, with conditions. Talk to your Section Chief if you wish to consider this option.

Section VII: Penalty

Can you calculate a penalty using the CAA Penalty Policy?

64. ☐ Yes. The penalty is: \$ penalty dollars. Consider making penalty demand in 113 Conference. Consider potential Supplemental Environmental Projects (SEPs) (Skip to *Section VIII*)
65. ☒ No. There's not enough information. (Go to BOX 66.)

66. (If BOX 65. is checked) List questions that must be answered to calculate the penalty. Consider asking company for this information during the 113 Conference.
When repairs to the roofs took place.

- 66A. The deadline for this information is: Click the arrow to select date
- 66B. The penalty is: \$ penalty dollars.

Section VIII: Waiver

Do you plan to:

67. ☐ seek penalties for violations occurring longer than 1 year ago?
68. ☐ seek a penalty greater than \$362,141?

69. If BOX 67. or BOX 68. is checked, you need a waiver. The waiver request will be drafted and sent to ORC by this date: Click arrow to select date.

Section IX : Inability to Pay

Do you expect that this company may claim inability to pay the penalty?

70. ☐ Yes. Request copies of certified, complete financial statements including balance sheets, income statements, and the company's *signed* income tax returns, with all schedules and amendments, for the past 3 years. Ask the company to complete and return Form 4506-T authorizing the IRS to release transcripts of 3 years of tax returns to EPA. Consider requesting this information from company in the 113 Conference.⁶ Company will provide tax information by this date: Click arrow to select date.
71. ☒ No.

STOP, YOU ARE DONE WITH THIS CHECKLIST

⁶ Note that if the company meets the definition of "Small Business" under the SBREFA (see BOX 5.), you will need to send a Notice of Intent (also known as a "SBREFA Letter") that will also request this information.

Dun & Bradstreet One-Stop Report

Zenith Energy Terminals Holdings LLC

17 December 2018

Zenith Energy Terminals Holdings LLC

250 Mahoning Ave
Cleveland, OH 44113-2524
United States

Tel: 216-522-2300

www.arcterminals.com

D-U-N-S® Number: 01-335-3238
Employees: 3
Company Type: Private Branch
Corporate Family: 8 Companies
Ultimate Parent: Zenith Energy U.S., L.P.

Reporting Currency: NA
Annual Sales: NA
Total Assets: NA

Business Description

Zenith Energy Terminals Holdings LLC is primarily engaged in holding or owning securities of companies other than banks, for the sole purpose of exercising some degree of control over the activities of the companies whose securities they hold.

Source: D&B

Industry

Industry Miscellaneous Financial Services
ANZSIC 2006: 6240 - Financial Asset Investing
ISIC Rev 4: 642 - Activities of holding companies
NACE Rev 2: 642 - Activities of holding companies
NAICS 2012: 551112 - Offices of Other Holding Companies
UK SIC 2007: 642 - Activities of holding companies
US SIC 1987: 6719 - Offices of Holding Companies, Not Elsewhere Classified

D-U-N-S® Number: 01-335-3238 **Key IDSM Number:** 197041686

- 1 - Profit & Loss Item Exchange Rate: USD 1 =
2 - Balance Sheet Item Exchange Rate: USD 1 =

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Currency conversion provided by XE.com. Terms and privacy policy can be found on xe.com
Published by Dun & Bradstreet, Inc., 2018

Corporate Family

Corporate Structure News:

Zenith Energy U.S., L.P.
Zenith Energy Terminals Holdings LLC

Zenith Energy Terminals Holdings LLC

Total Corporate Family Members: 8

Company Name	Company Type	Location	Country/Region	Industry	Sales (mil)	Employees	Source
Zenith Energy U.S., L.P.	Parent	Metuchen, NJ	United States	Petroleum and Natural Gas Extraction	105.4	111	D&B
Zenith Energy Logistics Partners LP	Subsidiary	Houston, TX	United States	Petroleum Wholesale	105.4	111	D&B
ARC Terminals Mississippi Holdings LLC	Subsidiary	New York, NY	United States	Investment Services	0.1	103	D&B
Zenith Energy Terminals Holdings LLC	Holding	Spring, TX	United States	Holding Companies	20.3	45	D&B
Zenith Energy Terminals Holdings LLC	Branch	Curtis Bay, MD	United States	Storage and Warehousing		4	D&B
Uet Midstream, LLC	Subsidiary	Denver, CO	United States	Petroleum and Natural Gas Extraction	0.3	3	D&B
Zenith Energy Terminals Holdings LLC	Branch	Cleveland, OH	United States	Holding Companies		3	D&B
ARC Terminals Holdings LLC	Branch	Selma, NC	United States	Holding Companies		2	D&B

Data Noted as Source: D&B, © 2018 Dun & Bradstreet, Inc. All rights reserved.

Corporate linkage data:

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Zenith Energy Terminals Holdings LLC**Corporate Overview**

Location 250 Mahoning Ave Cleveland, OH, 44113-2524 Cuyahoga County United States	Sales (mil): NA Assets (mil): NA Employees: 3 D-U-N-S® Number: 01-335-3238 KeyIDSM: 197041686 Industry: Miscellaneous Financial Services	Company Type: Private Branch Quoted Status: Not Quoted
Tel: 216-522-2300 www.arcterminals.com		

Contents

Industry Codes
Business Description
Additional Information

Corporate Highlights

Women Owned:	No
Minority Owned:	No
Franchise Status:	Not a Franchise
Prescreen Score:	High Risk
Parent D-U-N-S® Number:	01-935-0254
Ultimate Parent D-U-N-S® Number:	08-102-8983

Industry Codes**ANZSIC 2006 Codes:**

6240 - Financial Asset Investing

ISIC Rev 4 Codes:

642 - Activities of holding companies

NACE Rev 2 Codes:

642 - Activities of holding companies

NAICS 2012 Codes:

551112 - Offices of Other Holding Companies

US SIC 1987:

6719 - Offices of Holding Companies, Not Elsewhere Classified

UK SIC 2007:

642 - Activities of holding companies

Business Description

Zenith Energy Terminals Holdings LLC is primarily engaged in holding or owning securities of companies other than banks, for the sole purpose of exercising some degree of control over the activities of the companies whose securities they hold.

Source: D&B

Additional Information

Disclaimer: The software and information ("Services") accessed herein were developed exclusively at private expense, and are proprietary to Dun & Bradstreet, Inc., and its affiliates and subsidiaries (collectively, "D&B"), and may include copyrighted works, trade secrets, or other materials created by D&B at great effort and expense.

If the Customer accessing the Services is part of the executive, legislative or judicial branches of the U.S. Federal Government, the Services contained herein are a Commercial Item as that term is defined in FAR 2.101, and are comprised of Technical Data, Computer Software and Computer Software Documentation as those terms are defined in FAR 52.227-14(a) and DFAR 252.227-13.

Customer's rights to use the Services are as described in the government contract signed between D&B and the Government.

Under no circumstances will the Customer accessing the Services have greater rights in the Services provided hereunder than "Limited Rights" as that term is defined in FAR 52.227-14 (ALT II) and DFAR 252.227-7013(f) and "Restricted Rights" as that term is defined in FAR 52.227-14 (ALT III) and DFAR 252.227-7014(f), respectively.

Live Report : ZENITH ENERGY TERMINALS HOLDINGS LLC

D-U-N-S® Number: 08-106-5362

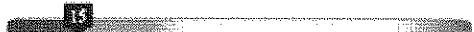
Endorsement/Billing Reference: Region5 KSwanson LHullinger

D&B Address Address 250 Mahoning Ave Cleveland, OH, US - 44113 Phone 216 522-2300 Fax Location Type Single Location Web	Endorsement : Region5 KSwanson LHullinger
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Company Summary

Currency: Shown in USD unless otherwise indicated

Score Bar

PAYDEX®	Unavailable
Commercial Credit Score Percentile	 Moderate to High Risk of severe payment delinquency.
Financial Stress Score National Percentile	 Moderate to High Risk of severe financial stress.
D&B Viability Rating	 View More Details
Bankruptcy Found	 No
D&B Rating	DS The information available does not permit us to classify the company.

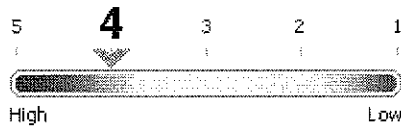
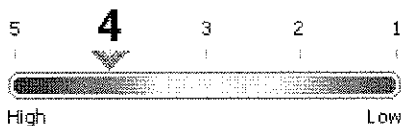
D&B Company Overview

This is a single location

Year Started	2007
SIC	4789
Line of business	Transportation services
NAICS	488999

Public Filings

 No public filings data is currently available.



PAYDEX® Trend Chart

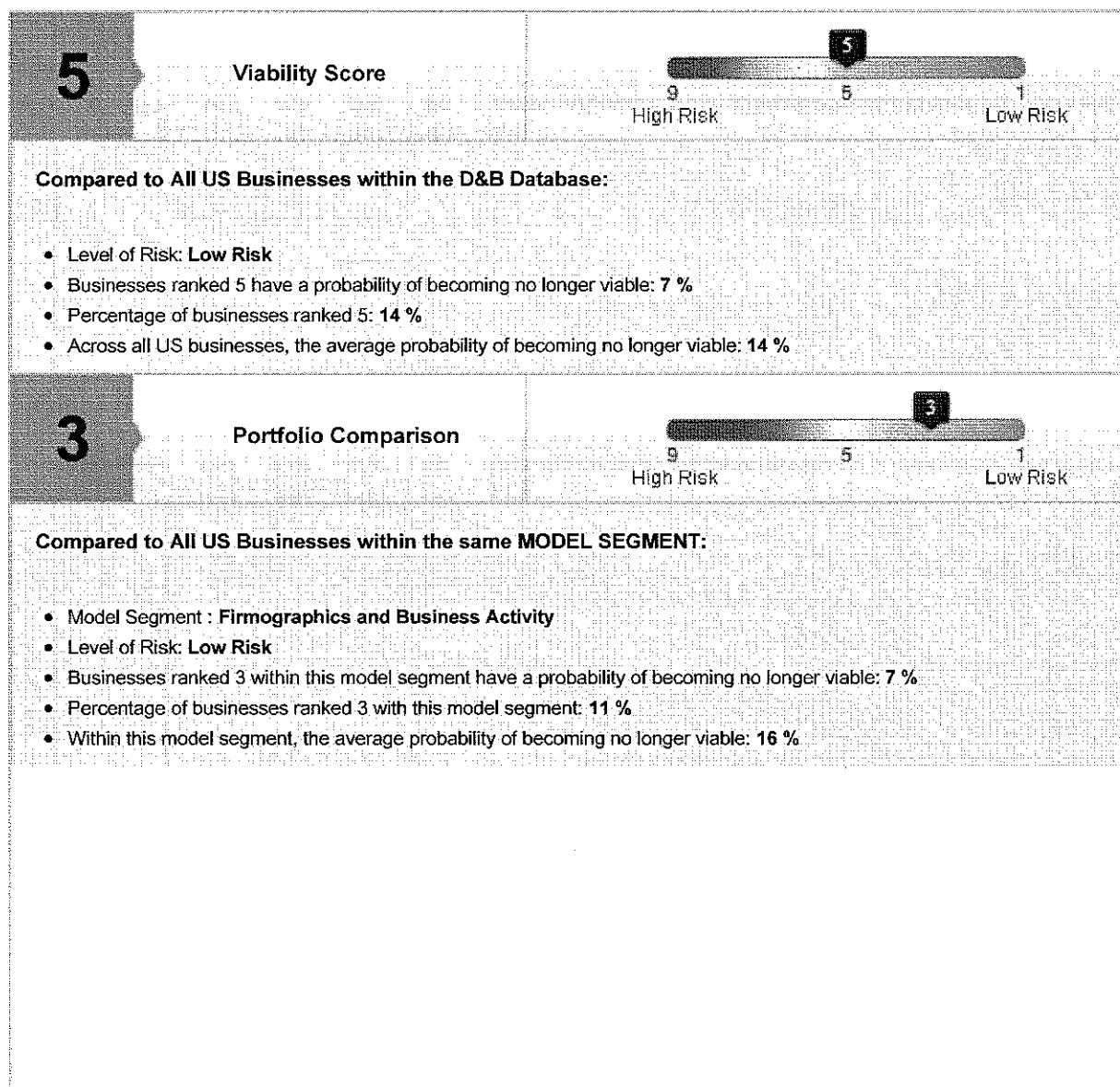
 D&B does not have enough information on this company to build a PAYDEX Trend Chart.

Predictive Scores

Currency: Shown in USD unless otherwise indicated 

D&B Viability Rating Summary

The D&B Viability Rating uses D&B's proprietary analytics to compare the most predictive business risk indicators and deliver a highly reliable assessment of the probability that a company will go out of business, become dormant/inactive, or file for bankruptcy/insolvency within the next 12 months. The D&B Viability Rating is made up of 4 components:



G

Data Depth Indicator

G

Descriptive

A

Predictive

Data Depth Indicator:

✓ Basic Firmographics

✗ No Financial Attributes

Greater data depth can increase the precision of the D&B Viability Rating assessment.

W

Company Profile

Financial Data	Trade Payments	Company Size	Years in Business
Not Available	Not Available	Small	Established

Company Profile Details:

- Financial Data: **Not Available**
- Trade Payments: **Not Available**
- Company Size: **Small** (Employees: <10 and Sales: <\$10K or Missing)
- Years in Business: **Established (5+)**

D&B Credit Limit Recommendation

Conservative credit Limit 1,000
Aggressive credit Limit: 7,500

Risk category for this business : **MODERATE**



The Credit Limit Recommendation (CLR) is intended to serve as a directional benchmark for all businesses within the same line of business or industry, and is not calculated based on any individual business. Thus, the CLR is intended to help guide the credit limit decision, and must be balanced in combination with other elements which reflect the individual company's size, financial strength, payment history, and credit worthiness, all of which can be derived from D&B reports.

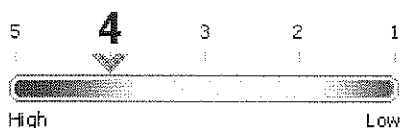
Risk is assessed using D&Bs scoring methodology and is one factor used to create the recommended limits. See Help for details.

Financial Stress Class Summary

The Financial Stress Score predicts the likelihood of a firm ceasing business without paying all creditors in full, or reorganization or obtaining relief from creditors under state/federal law over the next 12 months. Scores were calculated using a statistically valid model derived from D&Bs extensive data files.

The Financial Stress Class of 4 for this company shows that firms with this class had a failure rate of 0.84% (84 per 10,000), which is 1.75 times higher than the average of businesses in D & B's database.

Financial Stress Class :



Moderately higher than average risk of severe financial stress, such as a bankruptcy or going out of business with unpaid debt, over the next 12 months.

Probability of Failure:

Risk of Severe Financial Stress for Businesses with this Class: **0.84 %** (84 per 10,000)
Financial Stress National Percentile : **19** (Highest Risk: 1; Lowest Risk: 100)

Financial Stress Score : **1414** (Highest Risk: 1,001; Lowest Risk: 1,875)
Average Risk of Severe Financial Stress for Businesses in D&B database: **0.48 %** (48 per 10,000)

The Financial Stress Class of this business is based on the following factors:

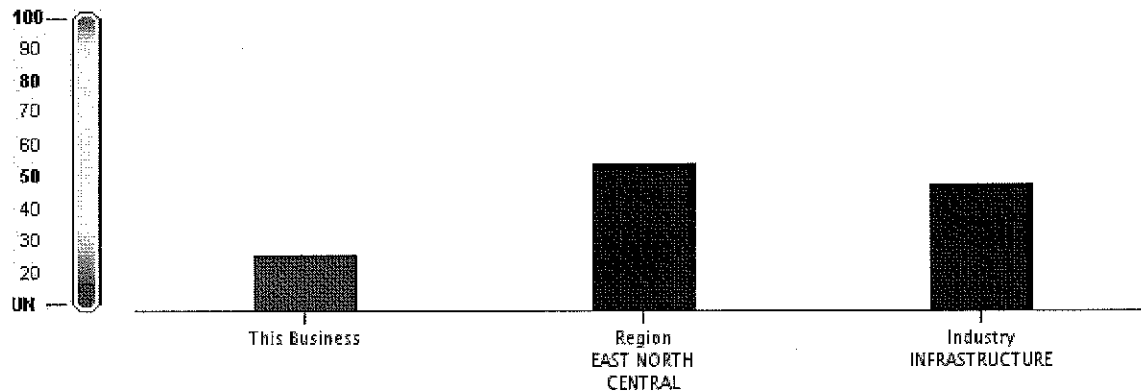
No payment experiences.
Limited time in business

Financial Stress Percentile Trend:

D&B does not have enough information on this company to build a Financial Stress Percentile Trend Chart.

Notes:

The Financial Stress Class indicates that this firm shares some of the same business and financial characteristics of other companies with this classification. It does not mean the firm will necessarily experience financial stress.
The Probability of Failure shows the percentage of firms in a given Class that discontinued operations over the past year with loss to creditors. The Probability of Failure - National Average represents the national failure rate and is provided for comparative purposes.
The Financial Stress National Percentile reflects the relative ranking of a company among all scorable companies in D&B's file.
The Financial Stress Score offers a more precise measure of the level of risk than the Class and Percentile. It is especially helpful to customers using a scorecard approach to determining overall business performance.



Norms	National %
This Business	19
Region: EAST NORTH CENTRAL	50
Industry: INFRASTRUCTURE	43
Employee range:	UN
Years in Business: 11-25	68

This Business has a Financial Stress Percentile that shows:

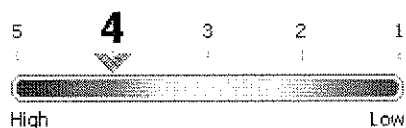
Higher risk than other companies in the same region.
Higher risk than other companies in the same industry.
Higher risk than other companies with a comparable number of years in business.

Credit Score Summary

The Commercial Credit Score (CCS) predicts the likelihood of a business paying its bills in a severely delinquent manner (91 days or more past terms).

The Credit Score class of 4 for this company shows that 9.4% of firms with this class paid one or more bills severely delinquent, which is lower than the average of businesses in D & B's database.

Credit Score Class :



Incidence of Delinquent Payment

Among Companies with this Classification: **9.40 %**
Average compared to businesses in D&B's database: **10.20 %**
Credit Score Percentile : **15** (Highest Risk: 1; Lowest Risk: 100)
Credit Score : **465** (Highest Risk: 101; Lowest Risk: 670)

The Credit Score Class of this business is based on the following factors:

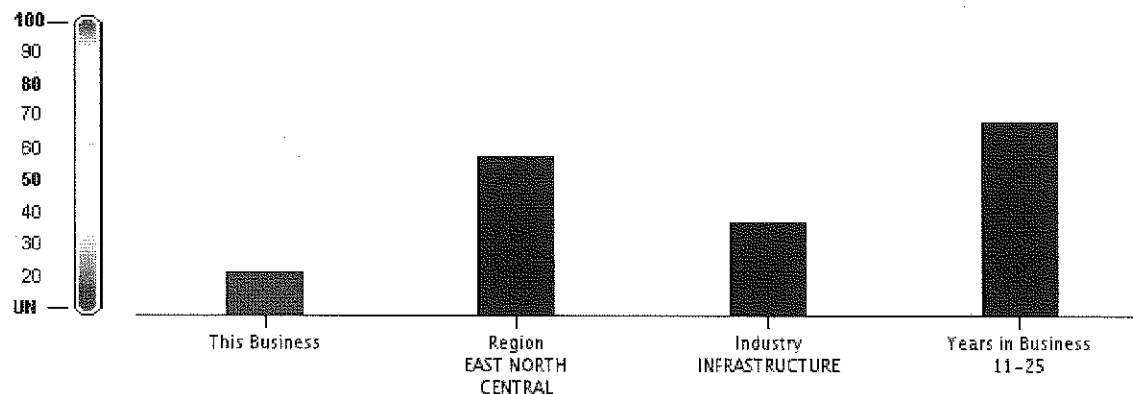
No payment experiences reported
Higher risk industry based on delinquency rates for this industry
Higher risk region based on delinquency rates for this region

Credit Score Class Percentile Trend:

D&B does not have enough information on this company to build a Credit Score Class Percentile Trend Chart.

Notes:

The Commercial Credit Score Risk Class indicates that this firm shares some of the same business and financial characteristics of other companies with this classification. It does not mean the firm will necessarily experience severe delinquency.
The Incidence of Delinquent Payment is the percentage of companies with this classification that were reported 91 days past due or more by creditors. The calculation of this value is based on D&B's trade payment database.
The Commercial Credit Score percentile reflects the relative ranking of a firm among all scorable companies in D&B's file.
The Commercial Credit Score offers a more precise measure of the level of risk than the Risk Class and Percentile. It is especially helpful to customers using a scorecard approach to determining overall business performance.



Norms	National %
This Business	15
Region: EAST NORTH CENTRAL	54
Industry: INFRASTRUCTURE	32
Employee range:	UN
Years in Business: 11-25	66

This business has a Credit Score Percentile that shows:

Higher risk than other companies in the same region.
Higher risk than other companies in the same industry.
Higher risk than other companies with a comparable number of years in business.

Trade Payments

Currency: Shown in USD unless otherwise indicated

D&B PAYDEX®

Timeliness of historical payments for this company.

Current PAYDEX is	Unavailable
Industry Median is	80 Equal to generally within terms
Payment Trend currently is	Unavailable, compared to payments three months ago

Indications of slowness can be the result of dispute over merchandise, skipped invoices etc. Accounts are sometimes placed for collection even though the existence or amount of the debt is disputed.

Total payment Experiences in D&Bs File (HQ)	N/A
Payments Within Terms (not weighted)	N/A
Trade Experiences with Slow or Negative Payments(%)	N/A
Total Placed For Collection	N/A
High Credit Average	N/A
Largest High Credit	N/A
Highest Now Owing	N/A
Highest Past Due	N/A

D&B has not received a sufficient sample of payment experiences to establish a PAYDEX score.D&B receives nearly 400 million payment experiences each year. We enter these new and updated experiences into D&B Reports as this information is received. At this time, none of those experiences relate to this company.

Payment Habits

For all payment experiences within a given amount of credit extended, shows the percent that this Business paid within terms. Provides number of experiences to calculate the percentage, and the total credit value of the credit extended.

\$ Credit Extended	# Payment Experiences	Total Amount	% of Payments Within Terms
Over 100,000	0	0	0%
50,000-100,000	0	0	0%
15,000-49,999	0	0	0%
5,000-14,999	0	0	0%
1,000-4,999	0	0	0%
Under 1,000	0	0	0%

Based on payments collected over last 24 months.

All Payment experiences reflect how bills are paid in relation to the terms granted. In some instances, payment beyond terms can be the result of disputes over merchandise, skipped invoices etc.

Detailed payment history for this company

D&B has not received a sufficient sample of payment experiences to establish a PAYDEX score.D&B receives nearly 400 million payment experiences each year. We enter these new and updated experiences into D&B Reports as this information is received. At this time, none of those experiences relate to this company.

Public Filings

Currency: Shown in USD unless otherwise indicated 

Summary

A check of D&B's public records database indicates that no filings were found for ZENITH ENERGY TERMINALS HOLDINGS LLC at 250 Mahoning Ave , Cleveland OH .

D&B's extensive database of public record information is updated daily to ensure timely reporting of changes and additions. It includes business-related suits, liens, judgments, bankruptcies, UCC financing statements and business registrations from every state and the District of Columbia, as well as select filing types from Puerto Rico and the U.S. Virgin Islands.

D&B collects public records through a combination of court reporters, third parties and direct electronic links with federal and local authorities. Its database of U.S. business-related filings is now the largest of its kind.

History & Operations

Currency: Shown in USD unless otherwise indicated 

Company Overview

Company Name:	ZENITH ENERGY TERMINALS HOLDINGS LLC
Street Address:	250 Mahoning Ave Cleveland , OH 44113
Phone:	216 522-2300
Present management control	11 years

History

The following information was reported: **02/01/2018**

The Delaware Secretary of State's business registrations file showed that Zenith Energy Terminals Holdings LLC was registered as a Limited Liability Company on June 8, 2007, under file registration number 4367449.

Business started 2007.

Operations

02/01/2018

Description: Provides transportation services, specializing in pipeline terminal facilities.

SIC & NAICS

SIC:

Based on information in our file, D&B has assigned this company an extended 8-digit SIC. D&B's use of 8-digit SICs enables us to be more specific about a company's operations than if we use the standard 4-digit code.

The 4-digit SIC numbers link to the description on the Occupational Safety & Health Administration (OSHA) Web site. Links open in a new browser window.

4789 9901 Pipeline terminal facilities, independently operated

NAICS:

488999 All Other Support Activities for Transportation

Financials

Company Financials: D&B

Additional Financial Data

Request Financial Statements

Request Financial Statements

Requested financials are provided by ZENITH ENERGY TERMINALS HOLDINGS LLC and are not DUNSRight certified.

Key Business Ratios

D & B has been unable to obtain sufficient financial information from this company to calculate business ratios. Our check of additional outside sources also found no information available on its financial performance.

To help you in this instance, ratios for other firms in the same industry are provided below to support your analysis of this business.

Based on this Number of Establishments

11

Industry Norms Based On 11 Establishments

	This Business	Industry Median	Industry Quartile
Profitability			
Return on Sales %	UN	4.7	UN
Return on Net Worth %	UN	28.2	UN
Short-Term Solvency			
Current Ratio	UN	1.7	UN
Quick Ratio	UN	1.3	UN
Efficiency			
Assets to Sales %	UN	41.8	UN
Sales / Net Working Capital	UN	12.1	UN
Utilization			
Total Liabilities / Net Worth (%)	UN	113.9	UN

UN = Unavailable

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