



**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 1 – NEW ENGLAND
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BOSTON, MASSACHUSETTS 02109-3912**

CAA 112 (r), Risk Management Plan (RMP), CAA § 112(r)(1) General Duty Clause (GDC), CERCLA § 103, and EPCRA §§ 302-313 Compliance Evaluation Inspection of:

**Inland Plymouth Terminal
370 Main Street
Terryville, CT 06786**

4/6/2023
Date of Inspection

Len Wallace
Waste and Chemical Compliance Section

9/26/2023
Date Inspection Report Approved

Mary Jane O'Donnell, Manager
Waste and Chemical Compliance Section

9/26/2023
Date Inspection Report Finalized

9/26/2023
Date Inspection Report Transmitted to Facility

Disclaimer: Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 1

EPCRA and CAA § 112(r) Inspection Report

Date: September 26, 2023

From: Len Wallace, Andrew Meyer, Inspectors
Waste and Chemical Compliance Section

Through: Mary Jane O'Donnell, Chief
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) Section 103 of Inland Plymouth Terminal, Terryville, CT.

I. GENERAL INFORMATION

Facility Name: Inland Plymouth Terminal

Dun and Bradstreet Number: 403486610

RMP Number: 1000 0024 4292

Address: 370 Main Street
Terryville, Connecticut, 06786

Inspector Names: Tyler Diercks, U.S. Environmental Protection Agency (EPA) Region 1
Andrew Meyer, U.S. EPA Region 1
Leonard Wallace, U.S. EPA Region 1
Brook McKeown, ERG
John Burton, Weston Solutions

Inspection Date: April 6, 2023

Type of Inspection: Risk Management Plan (RMP) CAA § 112(r), CERCLA § 103, and EPCRA §§ 302-313 Compliance Evaluation Inspection

Purpose of Inspection: This inspection was conducted as a routine EPA CAA § 112(r)/EPCRA compliance evaluation inspection.

Current Owner: Santa Energy Corporation

Current Operator: Inland Fuel Terminals, Inc.

Primary NAICS codes: 424710 (Petroleum Bulk Stations and Terminals)

Number of full-time employees: 3

Estimated Annual Sales: \$47.1M

Relationship to other firms, parent corporation, subsidiaries, and location of off-site facilities:
Santa Energy Corporation is the parent company of Inland Fuel Terminals, Inc.

II. GENERAL FACILITY DESCRIPTION

The Inland Plymouth Terminal is located at 370 Main Street in Terryville, CT (IPT or the Facility). The Facility operates a bulk propane terminal. The property is fenced in, with secured entrances along the northern and eastern sides of the site. The property is bordered by undeveloped properties to the north, a rail line and undeveloped properties to the west, residential properties to the east and commercial properties to the south.

Propane, stored as Liquefied Petroleum Gas (LPG), is received on-site via rail car and transferred to one of six 90,000-gallon storage tanks. Propane is then transferred via underground piping to one of two transport unloading skids, where material can be unloaded into up to four tank trucks at a time. The Facility also has the capability to load storage tanks by truck.

The Facility's 2023 EPCRA § 312 Tier II reports indicate that a maximum quantity of 2,022,120 pounds of propane was stored on-site at any time in 2022. The RMP report filed in June 2020 indicated a maximum intended storage quantity of 4,056,570 pounds of propane.

Attachment 1 is a Google Earth aerial photograph of the IPT facility.

III. IN-BRIEF/OPENING CONFERENCE

The EPA inspection team, consisting of Tyler Diercks, Leonard Wallace and Andrew Meyer (USEPA Region 1), Brook McKeown (USEPA contract inspector), and John Burton (USEPA air monitoring contractor), entered the Facility at approximately 9:00 a.m. The inspection team presented identification to Stephen Santa, Director of Operations at Santa Energy. Inspector Wallace conducted the opening meeting and explained the reason and scope of the inspection. Inspector Wallace presented the EPCRA Notice of Inspection to Mr. Santa, who signed as the Recipient of the Notice. Mr. Santa did not attempt to deny Facility entry to the inspectors, nor did he invoke any claims of Confidential Business Information (CBI) for purposes of the inspection.

Facility Representatives:

Name	Title/Company	Phone Number	E-mail
Stephen Santa	Director of Operations, Santa Energy	203-770-3338	santasb@santaenergy.com
Brandon Cooper	Terminal Operator, Inland	203-216-4124	cooperb@gmail.com
Sara Agosti	EHS, Santa Energy	475-319-5669	agostis@santaenergy.com
Jeremy Legenelu	Terminal Manger, Inland	203-913-2124	legeneluJ@inlandfuel.com

Inspector Wallace shared the following guidance documents with Facility representatives:

1. Guide to the Emergency Planning and Community Right-to-Know Act (Fall 2020)
2. EPCRA Quick Reference Fact Sheet (Fall 2020)
3. List of Lists (EPA 550-B-20-001, August 2020)
4. Small Business Resource Information Sheet (February 2020, EPA-300-F-20-002)
5. *National Response Center Oil and Chemical Spill Reporting* flyer
6. *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 of the Facility. He also stated that the inspection team would be taking photographs of items and areas of interest and a copy of all photographs would be provided to the Facility representative after the inspection.

IV. PHYSICAL INSPECTION

The EPA inspection team conducted a walk-through of the following areas at the Facility:

- Facility Entrances
- Site Building and Adjacent Areas
- Rail Line and Rail Car Unloading Towers
- Propane Storage Tanks
- Tank Truck Unloading Skids

Inspector Wallace took 118 digital photographs during the inspection to document observed conditions. These photographs are referenced throughout the inspection report. The following sections discuss areas of concern identified in each area during the physical inspection.

Facility Entrances

The Facility is surrounded by a fence, with two entrance gates, one on the northern property boundary and one on the eastern property boundary. The entrance gates all require a key card or passcode to enter, and open automatically from the inside upon approach by vehicle. Entrance gates are available 24 hrs a day. In the event of a loss of power to the automatic gate, manual clutches are present. EPA inspectors identified the following areas of concern based on a tour of the area:

- The manual clutch on the gate motor at the southern facility entrance is not labeled to its function (see photographs P1120322 and P1120323).
- Windsocks are not visible from all locations within the propane rail car unloading terminal and from all approaches to the site on Main Street (see photograph P1120399 and P1120400).
- There are no personal egress gates anywhere along the entire fence in area and the other large vehicle entry/egress gates where all chained and locked (see photograph P1120337, P1120351 and P1120397).

Site Building and Adjacent Areas

The Facility building is located on the southern portion of the Facility. When operators are present, they are stationed in this building. Adjacent to the building is a fire hydrant, nitrogen tank,

emergency generator, electrical equipment, tool shed and chemical storage. EPA inspectors identified the following areas of concern based on a tour of the area:

- There is one fire hydrant at the site, located on the southern end of the property (see photograph P1120343). This arrangement does not allow for each propane storage tank to be reached from at least two directions by at least three cooling streams, using less than 300 feet of hose. Labels on confined space entries were not large enough on certain equipment (see photographs P1120168 and P1120169).
- Facility personnel stated that certain lower explosive limit (LEL) detectors and ultraviolet (UV) flame detectors have been non-functional for over two years, due to water damage. The control panel readout for the sensors on the date of the inspection showed four UV flame detectors and seven LEL detectors had status of “ComErr” (see photographs P1120315 and P1120316). One UV flame detector and two LEL detectors appeared to be functioning. A broken LEL meter was observed in the field at Tank Unloading Tower T1 (see photograph P1120361)
- The facility does not have an emergency drainage system to direct fire protection water to a safe location and prevent discharge of liquids to public waterways, public sewers, or adjoining property.
- The nitrogen tank adjacent to the operations building is not affixed with a National Fire Protection Association (NFPA) placards for multiple approaches (see photographs P1120329 and P1120330).
- The polychlorinated biphenyl (PCB) label on the transformer near the operations building is damaged (see photograph P1120331). According to facility personnel, the local utility company owns the transformer.
- Electrical cabinets near the operations building are not labeled with Arc Flash Study information (see photograph P1120332).
- The diesel storage tank at the base of the diesel-powered emergency generator is not labeled as to its contents or with an NFPA diamond (see photograph P1120333).
- Labeling on the emergency stop button for the diesel emergency generator is not large enough (see photographs P1120334 and P1120335).
- The tool shed on the southern portion of the site contains gas cans. However, the shed fire rating was unknown and is not labeled with an NFPA diamond (see photographs P1120334, P1120341, and P1120342).
- There was a small yellow and gray shed that held two 55-gallon metal drums of methanol and a metal Jerrycan label for Methanol. This shed’s fire rating was unknown (see photographs P1120334, P1120341, and P1120342).
- The two 55-gallon metal drums of methanol were bonded to each other but Inspectors could not determine if there was proper grounding (see photographs P1120338 and P1120339).
- Conflicting signage was observed at the shut-off button adjacent to the operations building. The button was labeled as both an “Operational Shut-off Valve” and “Propane Emergency Stop” button, which have different functions (see photograph P1120334). Additionally, two “Emergency Shut-off” signs were located on a nearby control panel for the nitrogen system and it was not clear what equipment the sign was associated with (see photographs P1120334, P1120347 and P1120349).
- Nitrogen piping leaving the tank was not labeled as to its contents or flow direction (see photographs P1120345 and P1120346).

Rail Line and Rail Car Unloading Towers

A rail spur enters the Facility at the southern fence-line and runs along the western portion of the site. The rail spur splits upon entering the facility, between which are four rail car unloading towers.

Each unloading tower can service two rail cars, one on each rail spur, such that a total of eight rail cars can be present on-site for active unloading operations at one time. The rail spurs meet again on the northern side of the unloading towers and the exits the facility at the northern fence-line. Propane is transported to the storage containers via underground piping. EPA inspectors identified the following areas of concern based on a tour of the area:

- Propane piping throughout the facility was not labeled as to its flow direction and was not consistently labeled as to its contents (see photographs P1120360, P1120364, P1120336, P1120372, P1120385, P1120406, P1120413).
- Corrosion protection paint was not applied to portions of propane piping at the point of piping support (see photographs P1120365 and P1120371). Evidence of corrosion was observed at certain points (see photograph P1120371).
- Valves in the rail car unloading area were not locked in place (see photographs P1120367 and P1120368).
- An unlabeled shut-down button was present at the top of one of the Tank Unloading Towers (see photographs P1120373 and P1120374). Additionally, another button had two different labels (“Operational Shutoff Valve” and “Rail Tower Shutdown”).
- According to facility personnel, propane shipments only undergo a sniff test, and are not tested by another means to confirm mercaptan content.
- Rail cars were not properly grounded at Tank Unloading Tower T2, as the grounding cable terminates at the tank unloading tower and the tower was not obviously grounded (see photographs P1120378 through P1120380). Other grounding wires were connected to piping supports (see photograph P1120391).
- Grounding wire at Tank Unloading Tower T2 was visibly damaged (see photograph P1120380). An additional grounding wire at the terminal was visibly damaged (see photograph P1120393). Facility does not have an interlock system to ensure that rail cars are grounded.
- To access piping and tanks on the western side of the unloading terminal, employees must walk all the way to the end of the terminal (see photographs P1120360 and P1120369). Additionally, on the eastern side of the bulk propane tanks, there are minimal gaps in the guard railing, such that personnel may have to step over or walk around to the north or south side to gain access to the tank or piping (see photographs P1120400, P1120415).
- Adequate bump protection was not present for the nitrogen purge line as it enters the propane unloading terminal (see photograph P1120389).

Propane Storage Tanks

Six bulk propane storage tanks are located in the center of the Facility. Propane is received from rail cars and sent to tank truck unloading skids via underground piping. The tanks were sectioned off with bump protection. EPA inspectors identified the following areas of concern based on a tour of the area:

- Bulk propane tanks are not labeled with unique identifiers from multiple approaches to be able to distinguish between them (see photograph P1120400).
- Bulk propane tanks are not strapped down and/or effectively secured (see photograph P1120400).

- Propane piping throughout the facility was not labeled as to its flow direction and was not consistently labeled as to its contents (see photographs P1120360, P1120364, P1120336, P1120372, P1120385, P1120406, P1120413).

Tank Truck Unloading Skids

The Facility operates two dual-sided unloading skids for tank trucks. The tank trucks arrive on-site and can receive propane at these locations. Hoses for delivery and vapor balance were present at each skid. EPA inspectors identified the following area of concern based on a tour of the area:

- Four hoses in the truck unloading area were marked with June 2019 inspection dates, which exceeds the requirement to inspect hoses in LP service annually (see photographs P1120419, P1120422 and P1120423).
- At the end of the two transport unloading skids pump dispenser where two buttons. One was marked Transport Number 3 Shutdown and Operational Shutoff Valve. The other Button was marked Emergency Shut Off. It was unclear to the function for each of the buttons (see photographs P1120420 and P1120422).

V. OUT-BRIEF/CLOSING CONFERENCE

Inspector Wallace emailed a copy of the preliminary areas of concern identified during the April 6, 2023 inspection to Mr. Preli on May 17, 2023 and conducted a virtual closeout meeting on May 24th.

The following is a list of the preliminary areas of concern identified during the inspection at the Facility:

1. There is one fire hydrant at the site, located on the southern end of the property (see photograph P1120343). This arrangement does not allow for each propane storage tank to be reached from at least two directions by at least three cooling streams, none of which uses more than 300 feet of hose.
2. Facility personnel stated that certain LEL detectors and ultraviolet (UV) flame detectors have been non-functional for over two years, due to water damage. The control panel readout for the sensors on the date of the inspection showed four UV flame detectors and seven LEL detectors had status of “ComErr” (see photographs P1120315 and P1120316). One UV flame detector and two LEL detectors appeared to be functioning. A broken LEL meter was observed in the field at Tank Unloading Tower T1 (see photograph P1120361).
3. The facility did not have an emergency drainage system to direct fire protection water to a safe location and prevent discharge of liquids to public waterways, public sewers, or adjoining property.
4. The manual clutch on the gate motor at the southern facility entrance was not labeled to its function (see photographs P1120322 and P1120323).
5. The nitrogen tank adjacent to the operations building did not have NFPA placards for multiple approaches (see photographs P1120329 and P1120330).
6. The PCB label on the transformer near the operations building is damaged (see photograph P1120331). According to facility personnel, the local utility company owns the transformer.
7. Electrical cabinets near the operations building were not labeled with Arc Flash Study results (see photograph P1120332).
8. Diesel-powered emergency generator is not labeled as to its contents or with an NFPA diamond (see photograph P1120333).
9. Labeling on the emergency stop button for the diesel emergency generator is not large enough (see photographs P1120334 and P1120335).

10. Tool shed on the southern portion of the site contains gas cans, however, the shed is not one-hour fire rated and is not labeled with an NFPA diamond (see photographs P1120334, P1120341, and P1120342).
11. Gate on the southern boundary of the facility fencing is pad-locked and not equipped with panic hardware (see photograph P1120337).
12. Limited personnel egress in the fencing system around the facility.
13. Conflicting signage was observed at the shut-off button adjacent to the operations building. The button was labeled as both an “Operational Shut-off Valve” and “Propane Emergency Stop” button, which have different functions (see photograph P1120334). Additionally, two “Emergency Shut-off” signs were located on a nearby control panel for the nitrogen system and it was not clear what equipment the sign was associated with (see photographs P1120334, P1120347 and P1120349).
14. Nitrogen piping leaving the tank was not labeled as to its contents or flow direction (see photographs P1120345 and P1120346).
15. Propane piping throughout the facility was not labeled as to its flow direction, and in some cases was not properly labeled as to its contents (see photographs P1120360, P1120364, P1120336, P1120372, P1120385, P1120406, P1120413).
16. Corrosion protection paint was not applied to portions of propane piping at the point of piping support (see photographs P1120365 and P1120371). Evidence of corrosion is observed at certain points (see photograph P1120371).
17. Valves in the rail car unloading area were not locked in place (see photographs P1120367 and P1120368).
18. An unlabeled shut-down button was present at the top of one of the Tank Unloading Towers (see photographs P1120373 and P1120374). Additionally, another button had two different labels (“Operational Shutoff Valve” and “Rail Tower Shutdown”).
19. According to facility personnel, propane shipments only undergo a sniff test, and are not tested by another means to confirm mercaptan content.
20. Rail cars were not properly grounded at T2, as the grounding cable terminates at the tank unloading tower and the tower was not obviously grounded (see photographs P1120378 through P1120380). Other grounding wires were connected to piping supports (see photograph P1120391).
21. Grounding wire at Tank Unloading Tower T2 was visibly damaged (see photograph P1120380). An additional grounding wire at the terminal was visibly damaged (see photograph P1120393). Facility does not have an interlock system to ensure that rail cars are grounded before off-loading.
22. To access piping and tanks on the western side of the unloading terminal, employees must walk all the way to the end of the terminal (see photographs P1120360 and P1120369). Additionally, on the eastern side of the bulk propane tanks, there are minimal gaps in the guard railing, such that personnel may have to step over or walk around to the north or south side to gain access to the tank or piping (see photographs P1120400, P1120415)
23. Adequate bump protection was not present for the nitrogen purge line as it enters the propane unloading terminal (see photograph P1120389).
24. Windsocks are not visible from all locations within the propane rail car unloading terminal and from all approaches to the site on Main Street (see photograph P1120399 and P1120400).
25. Bulk propane tanks are not labeled with unique identifiers from multiple approaches to be able to distinguish between them (see photograph P1120400).
26. Bulk propane tanks are not strapped down (see photograph P1120400).

27. Four hoses in the truck unloading area were marked with June 2019 inspection dates, which exceeds the requirement to inspect hoses in LP service annually (see photographs P1120419, P1120422 and P1120423).

VI. FACILITY COMPLIANCE STATUS AND ELEMENTS OF PROOF - EPCRA

EPCRA § 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: Inspectors' observations; RY 2023 Tier II report.

(3) How was maximum quantity on-site determined or calculated? Equipment capacity information and chemical inventory data for other onsite chemicals.

EPCRA § 303

(1) Facility Coordinator identified per Sec. 303 and date LEPC was notified? N/A

EPCRA § 311

(1) Is facility required to maintain SDSs under the OSHA Hazard Communication Standard 29 CFR 1910.1200.? 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? Unknown

(4) How were the maximum amounts determined? Equipment capacity information and chemical inventory data for other onsite chemicals.

(5) Section 311 info supplied to the:

SERC (Y/N): Unknown

LEPC (Y/N): Unknown

Local Fire Department(Y/N): Unknown

Date: Unknown

Chemical List: Available

SDSs: Yes

(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 § 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? No. Chemical inventory data requested during inspection for review following inspection.

(5) Table of EPCRA 312 Extremely Hazardous Substances

Based on 2022 Tier 2 Form

CAS #	Chemical	Approx. Max. Wt. on Site (Lbs.)	TPQ (Lbs.)	Approx. Ratio (Actual/TPQ)
74-98-6	Propane	2,022,120	10,000	202.12
67-56-1	Methanol	770	10,000	.077

VII. ENFORCEMENT HISTORY

A search of EPA's ECHO database found no record for the Inland Plymouth Terminal located at 370 Main Street in Terryville, CT.

VIII. ENVIRONMENTAL JUSTICE

The Environmental Justice report for the communities surrounding the Inland Plymouth Terminal facility indicates that the facility is not located in an Environment Justice Area.

Attachment 1

Google Earth Image of Inland Plymouth Terminal