



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Air Act Inspection of MIPC, LLC
Inspection Date(s): November 13, 2024
Regulatory Program(s): Title V, NESHAP, NSPS, SIP

Company Name: MIPC, LLC
Facility Name: MIPC, LLC G Street Philadelphia Terminal
Facility Location: G Street and Hunting Park Avenue
Philadelphia, PA 19124

Latitude: 40.012261 **Longitude:** -75.111969
County/Parish: Philadelphia

AFS/ICIS-Air Number: PAPAM0004210105004
Permit Number: OP17-000034
NAICS Code: 424710 **SIC:** 5171
DSB ID #: ECAD-6144

Facility Representatives: **Point of Contact**
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See Attachment 2 for other Facility Representatives

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EPA Lead Inspector

Signature

Dean Deluca

Date

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Wheeling, WV 26003-2995

Supervisor

Signature

Kristen Hall

Date

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I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at MIPC, LLC G Street Philadelphia Terminal (MIPC or Facility) to verify compliance with applicable State and Federal regulations. The Philadelphia Air Management Services (AMS) was notified of the inspection on October 29, 2024, via email. On November 7, 2024, EPA notified the Facility of the planned inspection via phone and email. EPA emailed a list of records for review to Abdul Bamgbose, prior to the inspection (see Attachment 1). These records are listed in the Records Review section of the report.

The inspection included an evaluation of the Facility's processes and its compliance with the CAA. All information included in this report is the result of statements by the Facility representatives, materials shown to the inspectors by the Facility representatives, and/or documents provided by the Facility representatives to the inspectors at the time of, or subsequent to, the inspection. In addition, information gathered prior to the inspection from a review of EPA and State records may be included in Section A. Summary of the Facility.

A. Summary of the Facility

The Facility is located at the intersection of G Street and East Hunting Park Avenue, Philadelphia, PA 19124. The Facility is a gasoline terminal that receives gasoline via pipeline and stores the product in above ground storage tanks until the gasoline is mixed with ethanol and additives and unloaded to trucks for delivery to local gasoline dispensing facilities. MIPC is a wholly owned subsidiary of Monroe Energy and is described as a Petroleum Bulk Stations and Terminals (NAICS code of 424710 and SIC code of 5171). Additional information can be found at their website:

<https://www.monroepipeline.com>.

The Facility received a Title V Operating Permit (OP17-000034) from AMS issued on June 3, 2019. This issued permit has an expiration date of June 3, 2024; however, the Facility submitted a Title V renewal application in October 2023.

MIPC, LLC is classified as a major source for Volatile Organic Compounds (VOCs) and a minor source for Hazardous Air Pollutants (HAPs) and all other criteria pollutants. The Facility is subject to, or potentially subject to the following federal regulations:

- 40 CFR Part 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, and On or Before October 4, 2023
- 40 CFR Part 63 Subpart BBBB – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

B. Inspection Opening Conference

At 8:45 AM on November 13, 2024, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. MIPC was represented by Matt Torell (Environmental Engineer), Ski Szymanski (Environmental Scientist), Caroline Kerr (Regulatory Compliance), Matt Day (Terminal O & R), and Josh Smith (Control Room Lead). Also, Manuel Zimmeroff (AMS) was present. EPA inspectors, Dean DeLuca, Stafford Stewart, and Owen Ehret presented their credentials and explained the purpose of the visit was to conduct a CAA inspection to determine compliance with their permit and any applicable regulations. EPA inspectors explained they would be using a FLIR GF320 infrared camera to observe emission sources and taking photos during the inspection. Additionally, EPA informed the facility representatives of their right to claim any confidential business information (CBI). At that time, MIPC did not claim any photos or documentation as CBI.

II. Site Activity/Process Description

This Facility has been at this location for over eighty years. MIPC, LLC operates two other terminals, Chelsea Terminal in Aston, PA, and Woodbury Terminal in Woodbury, NJ. MIPC, LLC has owned the G Street Terminal since 2012. Prior to MIPC ownership, there were at least five different owners. MIPC, LLC is a wholly owned subsidiary of Monroe Energy, LLC who is wholly owned by Delta Air Lines. Delta Air Lines, Inc. is a publicly traded company traded on the New York Stock Exchange (DAL). Monroe Energy, LLC has approximately 500 full time employees. MIPC has twenty-five full-time employees, one of which works full time at this Facility, typically from 6 AM-2 PM on Monday-Friday, although trucks can be loaded twenty-four hours per day seven days per week. The footprint of this terminal is approximately 9.5 acres.

MIPC stated that gasoline is produced at Monroe Energy's refinery in Trainer, PA and is delivered via pipeline to MIPC's Chelsea Terminal and stored in Chelsea's tanks. The gasoline is certified upon entering the Chelsea Terminal. Some of the products are only shortly stored at Chelsea Terminal before being delivered via pipeline here to the G Street Terminal and transferred to storage tanks. Both ethanol and other fuel additives are delivered to the Facility by truck. When a truck arrives at the Facility to pick up gasoline, the additives and ethanol are added to the gasoline at the truck loading rack (TLR). The Facility's TLR has two loading bays which can be loaded simultaneously, each with two loading arms.

The Facility stated that at the time of inspection there were three regular gasoline (RBOB – reformulated blendstock for oxygenate blending) tanks, one premium gasoline (PBOB – premium blendstock for oxygenate blending) tank, one ethanol tank, two additive tanks (one of which was out of service), one empty out of service tank, and one pipeline relief / pipeline surge tank as detailed in the following table.

<u>Tank ID</u>	<u>Tank Size (gallons)</u>	<u>Current Product</u>	<u>Construction Date</u>
T1301	1,020,000	Out of service	Plan Approval Issued 2/1/2019
T1303	420,000	Regular gasoline (RBOB)	1949
T1311	840,000	Regular gasoline (RBOB)	1949
T1312	840,000	Regular gasoline (RBOB)	1949
T1314	420,000	Premium gasoline (PBOB)	1949
T1322	420,000	Ethanol	1949
T1330	39,900	Pipeline relief / pipeline surge tank	1978
T1350	9,996	Additive	After 7/23/1984
T1351	19,992	Additive, out of service	After 7/23/1984

All tanks storing gasoline and ethanol have internal floating roofs (IFRs), the two additive tanks are less than 20,000 gallons and have horizontal fixed roofs, and the pipeline surge tank has a vertical fixed roof. When the pipeline surge tank is filled with transmix, it is shipped off-site by truck. The Facility stated the RVP (Reid Vapor Pressure) of their gasoline at the time of the inspection was 15psi. Emissions from the TLR are routed to a vapor recovery unit (VRU). There are two tanks which can collect vapors from the VRU, Tank 1311 and Tank 1312. At the time of the inspection, Tank 1311 was connected to the VRU. The VRU is performance tested every five years. MIPC also stated the Facility receives ethanol deliveries by truck and has an offloading bay for ethanol truck deliveries.

All truck drivers receiving product from the G Street Terminal must have supplied all necessary paperwork to MIPC prior to loading. Part of this paperwork is the company verifying that the truck has been inspected annually. MIPC's TLR doesn't allow the truck to load if the truck hasn't been certified in their system. The TLR's delivery speed is automatically controlled, drivers cannot control the speed of truck loading.

The Facility explained the process for switching the RVP values of the gasoline as described in this paragraph. When the Facility switches RVP values, all gasoline tanks are switched, and no gasoline tanks are left with the previous RVP value. The tanks are only landed when the Facility switches from higher to lower RVP. These landings occur twice per year at four of their tanks when the Facility switches from 15psi to 13.5psi and 13.5psi to 9psi totalling eight tank landings in a normal year. The duration of each tank landing is minimized and is always less than one day. The Facility uses AP-42 factors for determining the amount of emissions during tank landings and a summary of all tank landing emissions are reporting in the Facility's emissions inventory.

MIPC has replaced the carbon in the VRU twice since its purchase in 2012. These replacements occurred approximately in 2017 and 2022. Mainly due to a VRU issue the day prior to the inspection, MIPC is looking into replacing the carbon again. The Facility conducts an annual carbon check for the VRU and monthly FID (flame ionization detector) and AVO (audio, visual, olfactory) checks on the VRU.

MIPC stated that there have been no major changes at this terminal since MIPC ownership began in 2012. The only change noted by MIPC is a notice provided to AMS for a 40-kW natural gas standby generator which has not yet been operated. One of the Facility's tanks (Tank T1301) has been out of service since MIPC's purchase. If this tank is to be put back into service in the future, MIPC plans to contact AMS prior to reactivation. MIPC also stated that the Facility has no 40 CFR Part 82 Subpart F - Protection of Stratospheric Ozone activities.

The opening conference concluded at 10:01 AM.

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 10:35 AM by Matt Torell (Environmental Engineer), Ski Szymanski (Environmental Scientist), Caroline Kerr (Regulatory Compliance), Matt Day (Terminal O & R), and Josh Smith (Control Room Lead) of MIPC and Manuel Zimmeroff (AMS) was also present for the walkthrough. EPA inspectors noted photos would be taken during the Facility walkthrough (Attachment 3) as well as FLIR GF320 images and videos (Attachment 4 for image/video log). At the beginning of the inspection, the temperature of approximately 45°F and the sky was clear with low wind.

The inspection team first drove to the area of the tank farm and inlet piping. MIPC stated the pipeline surge tank, Tank T1330, was empty. After parking, the inspection team noted there was a large tank and another sizeable tank just outside the fenced area. MIPC stated the Facility owned the tanks, but the tanks are neither operational nor permitted at this time. A pig receiver is also located in the vicinity of the inlet piping and MIPC stated it is used quarterly to clean the pipelines and all liquid is drained beforehand. The flow rate was not observed in the field but could be observed later in the control room. At the time of the inspection, PBOB was being delivered via the pipeline to Tank T1314. After leaving the inlet piping area, the inspection team went into the diked area surrounding the tanks. In this area, there was a noticeable gasoline odor.

The inspection team climbed the catwalk and observed Tanks T1314, T1311, and T1301 in succession both visually and with the FLIR GF320. A similar gasoline odor was also observed while on the catwalk near the top of the tanks and the tank vents. Tank T1301 was out of service. The Facility stated the piping has not been removed but firefighting foam is no longer used.

After leaving this catwalk, the inspection team went to the catwalk used for Tanks T1312, T1303, and T1322 which were observed in succession both visually and with the FLIR GF320. The inspection team obtained two FLIR videos (MOV_0543 and MOV_0544) of emissions from Tank T1312's vent which was storing RBOB. The inspection team observed black staining on the side and top of Tank T1322 which was storing ethanol at the time of the inspection. The black staining appeared to be originating from the top of the tank and running down the side based on the tank being mostly white underneath the tank vents. However, there was also some staining on the top of the tank near the perimeter. MIPC

stated this staining is specific to ethanol tanks and is commonly found on tanks storage ethanol. Later in the inspection, MIPC expanded its explanation adding that this staining is caused by a fungus, typically called whiskey, distiller, or rum fungus.

The inspection team then left the tank farm and proceeded to the piping and VRU. The VRU has two carbon beds and is constantly extracting vapors even when truck loading is not occurring. Both carbon beds were manufactured by McGill Fabrication and were built in 1979. At the time of observation, Unit V-200A was regenerating and was 28.7°F while V-200B was 43.6°F and the total time of operation showed 3,963 days, eighteen hours, and forty-two minutes. The Facility stated the carbon beds alternated on fifteen-minute increments and switched while being observed by the inspection team. There is also a glycol tower and glycol fifty-five-gallon drum storage. MIPC stated the Facility maintains two fifty-five-gallon drums of glycol on-site and more is used in the summer.

The Facility stated that the Facility typically adds approximately 10% ethanol and less than 1% additives to the gasoline when it is being loaded onto tanker trucks for delivery to gasoline dispensing facilities. MIPC stated the Facility does not load diesel or jet fuel at this location, and MIPC owns just over fifty miles of pipeline including from the Chelsea Terminal to this G Street Terminal.

After leaving the VRU and breaking for lunch at 12:35 PM, the inspection team resumed the inspection at the TLR at 1:10 PM. The inspection team observed that the vapor recovery lines are open at the end of the lines located in the truck loading bays. At the time of observation, there was a small amount of liquid at the low point of the vapor recovery line which the Facility explained was there because operations were slow today. MIPC explained that Bay #1 is used for ethanol deliveries, while gasoline trucks are loaded in Bay #3 and Bay #4. MIPC said there is no Bay #2, but there is space if it is to be added. At 1:41 PM the inspection team observed a truck loading. There was an odor observed during the loading and the inspection team took a FLIR image (IR0546) and a FLIR video (MOV_0547) of emissions being emitted from the vapor recovery hose to the atmosphere. MIPC replaced the vapor recovery hose while the inspection team was still on-site. The inspection team then quickly observed the additive tanks, Tank 1350 and the out of service Tank 1351, and no emissions were observed with the FLIR GF320 camera before returning to the TLR for another truck loading. With the new vapor recovery hose in place, there were no observed emissions on the FLIR GF320 camera during this truck loading.

Following the TLR, the inspection team went to the control room. The Facility stated the TLR is shut down if any of the certain parameters are outside of their allowed range. Since MIPC doesn't always have personnel at this Facility, MIPC personnel will be notified in the event of any shutdown when no MIPC personnel are on-site. MIPC stated gasoline is typically received through the pipeline at approximately 3,000 barrels (BBL) per hour. At the time of observation, the pipeline delivery was concluding so the flow rate was decreasing and was observed at 1,935.4 BBL/hr. MIPC also stated the flow rates to the trucks vary between 250-400 gallons per minute.

The walkthrough concluded at 2:30 PM.

IV. Records Review

The records review commenced immediately after the plant walkthrough at 2:30 PM. EPA inspectors reviewed documents requested in the November 7, 2024, email to Abdul Bamgbose (see Attachment 1). Records were provided prior to the inspection by Matt Torrell, Environmental Engineer. Below are the records requested and what was provided:

1. Provide a plot plan of the facility available in hardcopy for the inspection opening conference which identifies each processing unit, control device, storage vessels, etc. for the facility.

Facility provided the requested plot plan.

2. Provide a detailed process description which includes all processes/storage units and emission points currently operational at the site.

Facility provided the requested description of facility operations.

3. Provide a description of any process, equipment, fuel, or material changes which may have increased or decreased emissions, including de minimus increases, since the last permit issuance in June 2019.

Facility provided the requested information including a proposed new generator which would increase emissions as well as MIPC's notification to AMS and AMS stating a permit is not needed for a generator of the proposed size, less than 100 horsepower.

4. Provide the address of any other locations owned and/or operated by MIPC, LLC. Also, provide the name of any parent company and the number (can be approximate if it is a large number) of facilities owned by them.

Facility provided the requested location information.

5. Provide the most recent annual/semiannual reports for relevant 40 CFR Part 63 and 40 CFR Part 60 Subparts, including, but not limited to, 40 CFR Part 63 Subpart BBBBBB.

Facility provided the requested most two recent semi-annual compliance reports for Subpart BBBBBB, most recent annual Title V Compliance Certification, and semi-annual monitoring report form.

6. Provide the two most recent LDAR inspections.

Facility provided the requested equipment leak inspection logs which are conducted monthly.

7. Provide the 12-month rolling total gasoline and light petroleum loading throughput for all months from January 2021.

Facility provided the requested throughput information, but during the onsite record review the inspection team found that additional information would have to be submitted since not all information was correctly transferred. This information was subsequently provided.

8. For each fire pump, generator, or engine located onsite, if any, provide:
 - The make and model of the unit;
 - The size of the unit (HP and displacement (L));
 - Fuel amount and type combusted monthly (gallons) from January 2021-present; and
 - Hours of operation monthly from January 2021-present.

Facility provided the requested information by providing the Title V Renewal Application showing the Facility does not have any of the listed equipment except the previously mentioned generator which has not been used.

In addition, EPA requested the following records or information while onsite and reviewed some of these records during the onsite records review. EPA did not collect any hard copy records.

1. G Street tank information table.
2. Safety Data Sheets for the previous and current additives.
3. The most recent seal inspection for each tank.
4. A summary of the most recent VRU stack test report.
5. An explanation of the significant increase in VOC emissions shown in the reported emissions inventory.
6. A further explanation of the black staining on the ethanol tank.
7. The model numbers for the pumps for the TLR.
8. An example of the weekly VRU inspections from 9-1-2024 and 2-12-2020.
9. The most recent quarterly preventative maintenance for the VRU.

V. Closing Conference

After the records review, EPA inspectors, Matt Torell (Environmental Engineer), Ski Szymanski (Environmental Scientist), Caroline Kerr (Regulatory Compliance), Matt Day (Terminal O & R), Josh Smith (Control Room Lead), Christine Shorokey (Vice President by telephone), Matt Melville (Operations by telephone), and Manuel Zimmeroff (AMS – Environmental Engineer) had a brief closing conference to ask additional questions and discuss observations. The EPA inspectors noted that the investigation is on-going, and any areas of concern identified in the final report do not necessarily reflect a violation or deviation, rather, they are areas that will require further investigation. EPA also noted that they would issue an inspection report within 60 days, with a copy to the State. Simultaneously, EPA will perform a detailed review of records and may have additional questions. The inspection concluded at 3:51 PM.

The following have been identified as potential issues during the inspection. They are issues that require either further investigation by EPA or additional information or explanation by MIPC.

- There were emissions observed on the FLIR GF320 camera exiting the vapor recovery hose during truck loading. MIPC replaced the vapor recovery hose while the inspection team was still on-site and there were no observed emissions with the replaced vapor recovery hose.

VI. List of Attachments

Attachment 1: Email correspondence to Abdul Bamgbose of records requested to review

Attachment 2: Sign-In Sheet

Attachment 3: Photo Log

Attachment 4: FLIR Image and Video Log

Deluca, Dean

From: Deluca, Dean
Sent: Thursday, November 7, 2024 11:09 AM
To: abdul.bamgbose@monroe-energy.com
Subject: EPA CAA Inspection of MIPC LLC

Categories: general reference

Abdul,

Per our conversation this morning, EPA is going to conduct a Clean Air Act inspection of MIPC LLC on November 13, 2024. EPA will have three inspectors (Dean DeLuca, Stafford Stewart, and Owen Ehret) onsite to conduct the inspection, which will include an opening conference, site walkthrough (including photos and FLIR monitoring), and record review/closing conference. AMS also plans to have an inspector (Manuel Zimmeroff) onsite for the inspection. EPA plans arrive at the facility on the morning of November 13, 2024 at 8:15 AM. Please see the below list of records EPA would like MIPC to provide. I will include a separate email with a link for MIPC to upload documents using EPA's goanywhere file sharing site. As I mentioned on the phone, I would like to have a hardcopy of the facility plot plan available at the beginning of the inspection. You indicated that the required PPE for the facility includes hard hat, safety glasses, safety boots, hearing protection, and FR clothing. One of our inspectors does not have FR clothing and is about 5'9" if it is possible for MIPC to loan him some FR clothing. Let me know if you have any questions about the inspection or record request.

1. Provide a plot plan of the facility available in hardcopy for the inspection opening conference which identifies each processing unit, control device, storage vessels, etc. for the facility.
2. Provide a detailed process description which includes all processes/storage units and emission points currently operational at the site.
3. Provide a description of any process, equipment, fuel, or material changes which may have increased or decreased emissions, including de minimus increases, since the last permit issuance in June 2019.
4. Provide the address of any other locations owned and/or operated by MIPC, LLC. Also, provide the name of any parent company and the number (can be approximate if it is a large number) of facilities owned by them.
5. Provide the most recent annual/semiannual reports for relevant 40 CFR Part 63 and 40 CFR Part 60 Subparts, including, but not limited to, 40 CFR Part 63 Subpart BBBBBB.
6. Provide the two most recent LDAR inspections.
7. Provide the 12-month rolling total gasoline and light petroleum loading throughput for all months from January 2021.
8. For each fire pump, generator, or engine located onsite, if any, provide:
 - The make and model of the unit;
 - The size of the unit (HP and displacement (L));
 - Fuel amount and type combusted monthly (gallons) from January 2021-present;
 - Hours of operation monthly from January 2021-present.

Thanks, Dean

Inspection Sign-In Sheet

Facility: MIPC LLC - G. ST.

Date: 11/13/2024

Name	Affiliation	Title	Phone Number	Email
Dean DeLuca	US EPA	Physical Scientist	304-234-0264	deluca.dean@epa.gov
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Manuel Zimmerman	AMS Philadelphia	Env Engr	215-685-9442	Manuel.Zimmerman@phil.gov
Matt Torell	Monroe Energy	Env Engr	610 742 6633	matt.torell@monroe-energy.com
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Josh Smith	MIPC	Control Room Lead	856-371-7668	joshua.smith@monroe-energy.com
Christine Sharkey	MIPC	VP	610 364 8187	
Phil Melville	Monroe	Operations	610 364 8172	

rec

11/13/2024
Christine Sharkey
Phil Melville

Attachment 3:

PHOTO LOG

Facility: MIPC LLC

Location: 4210 G Street Philadelphia, PA 19124

Inspection Date: November 13, 2024

EPA Inspector(s): Dean DeLuca, Stafford Stewart, Owen Ehret

Photographer: Stafford Stewart



Photo Number: 1

Photo Description: Tank 1301



Photo Number: 2

Photo Description: Tank Farm Overview



Photo Number: 3

Photo Description: Piping System Overview



Photo Number: 4

Photo Description: Gas Header of Piping System



Photo Number: 5

Photo Description: Tank 1314



Photo Number: 6

Photo Description: Top of Tank 1314



Photo Number: 7

Photo Description: Top of Tank 1311



Photo Number: 8

Photo Description: Vents on Tank 1314



Photo Number: 9

Photo Description: Tank 1312



Photo Number: 10

Photo Description: Tank 1312



Photo Number: 11

Photo Description: Tank 1312 Closeup



Photo Number: 12

Photo Description: Tank 1312 Closeup



Photo Number: 13

Photo Description: Tank 1303



Photo Number: 14

Photo Description: Tank 1303



Photo Number: 15

Photo Description: Top of Tank 1312



Photo Number: 16

Photo Description: Top of Tank 1322



Photo Number: 17

Photo Description: Black Staining on Tank 1322



Photo Number: 18

Photo Description: VRU Overview



Photo Number: 19

Photo Description: Carbon Adsorbers



Photo Number: 20

Photo Description: Carbon Adsorbers Other Angle



Photo Number: 21

Photo Description: Carbon Adsorber Plate



Photo Number: 22

Photo Description: Truck Loading Rack (TLR)



Photo Number: 23

Photo Description: Vapor Recovery Hose



Photo Number: 24

Photo Description: Additive Tanks 1351 & 1350

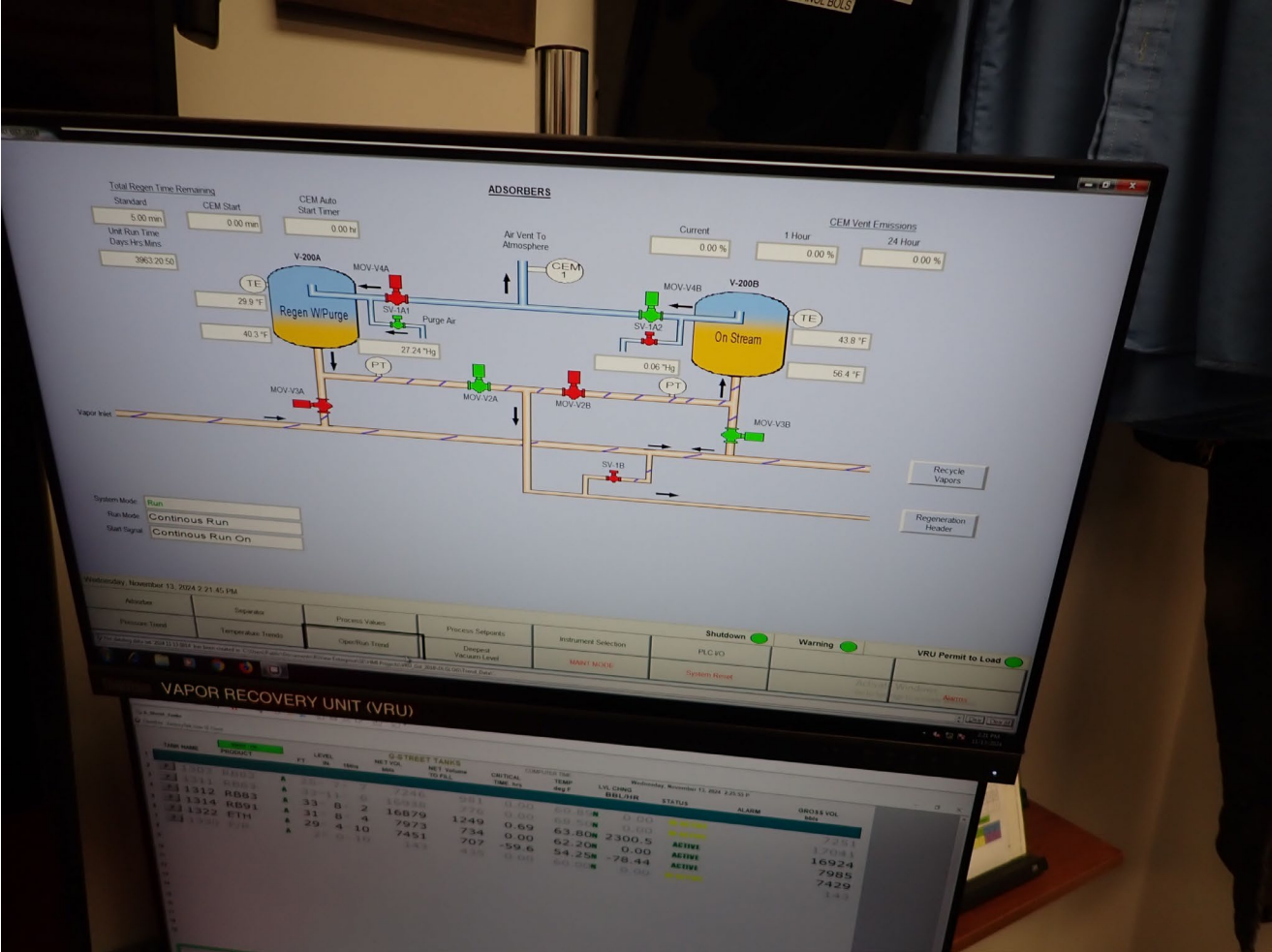


Photo Number: 25

Photo Description: Carbon Adsorber Screen

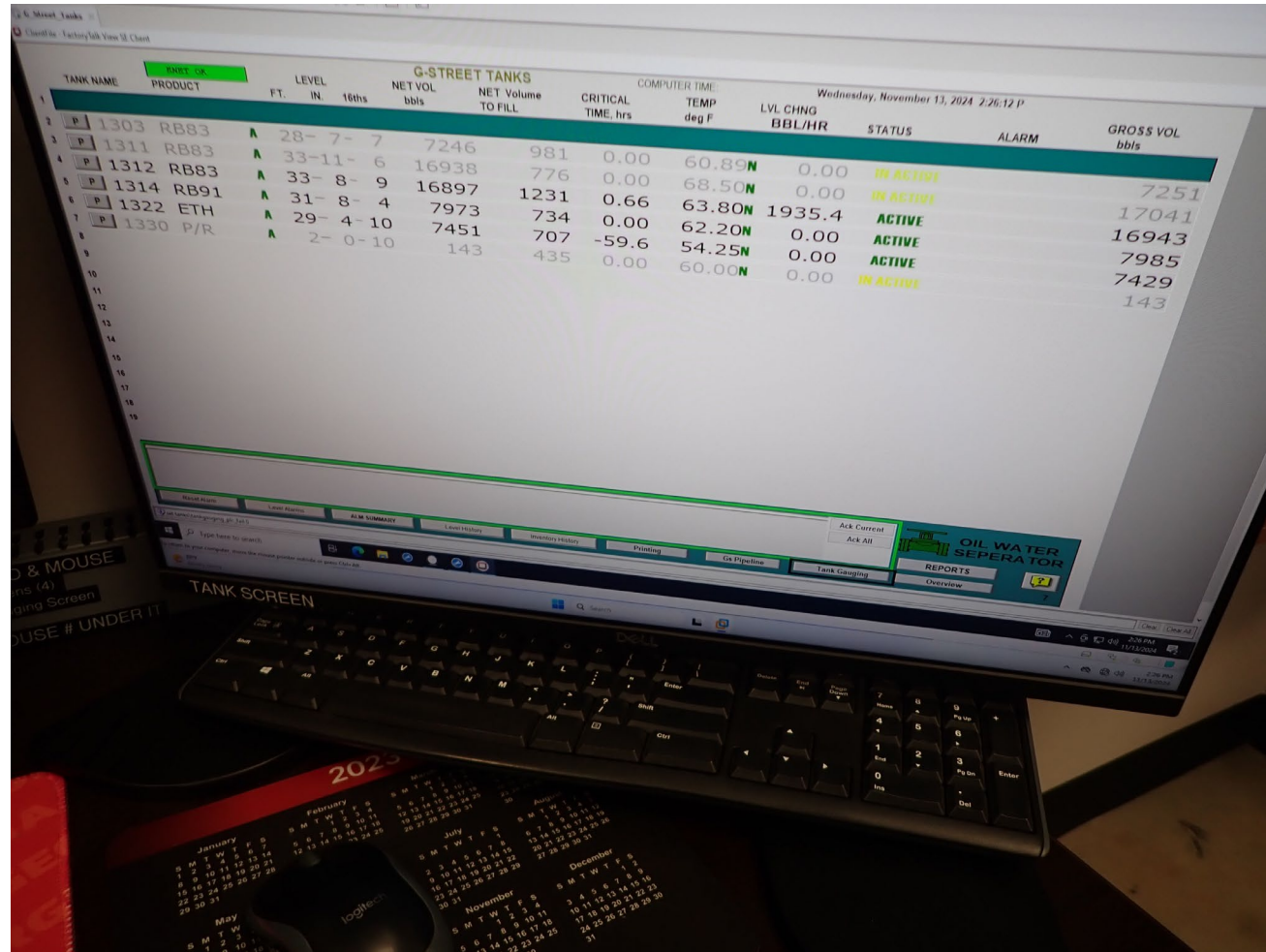


Photo Number: 26

Photo Description: Tank Levels Screen

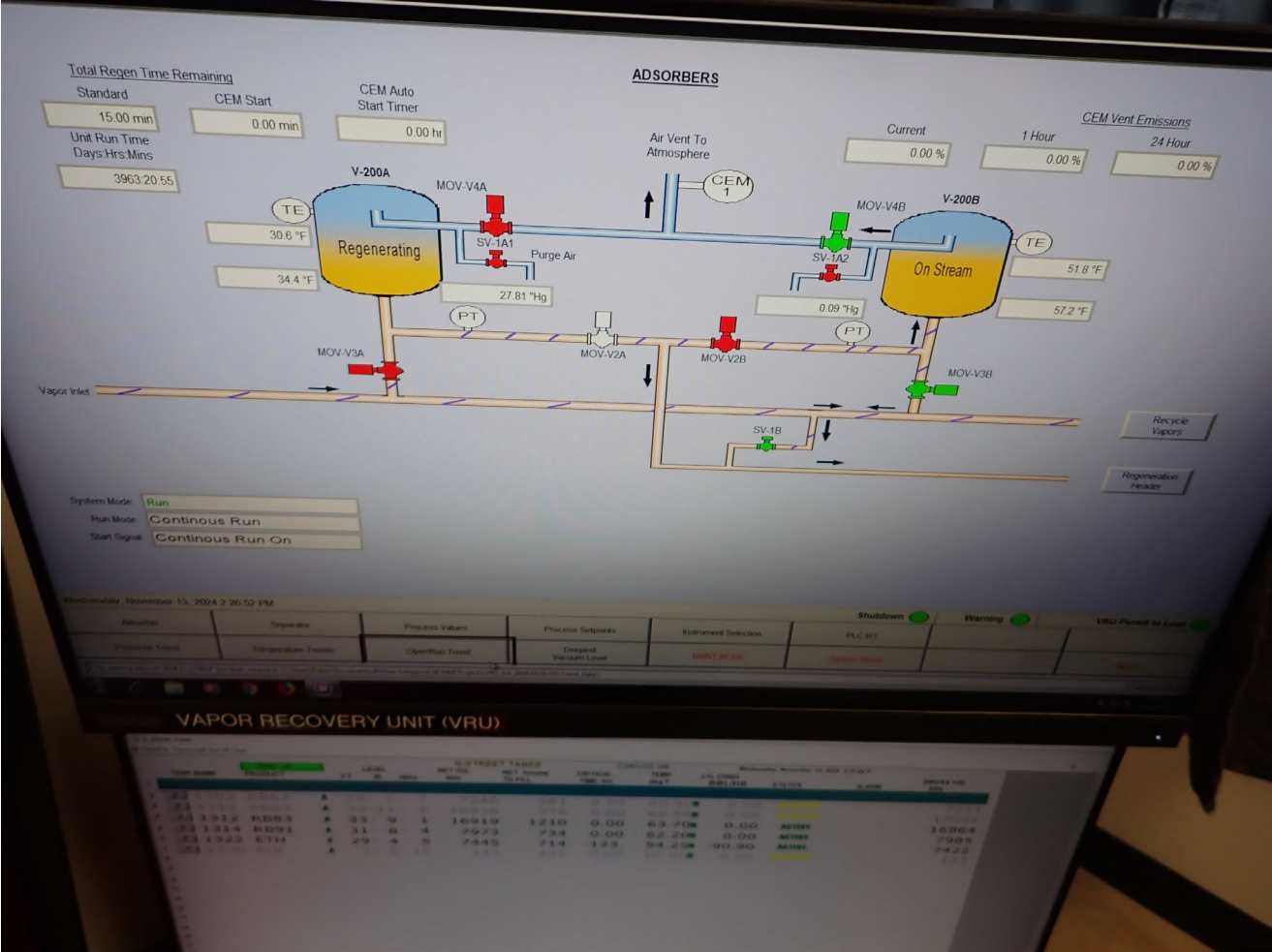


Photo Number: 27

Photo Description: Carbon Adsorber Screen

Attachment 4

FLIR Video and Photo Log

MIPC LLC, November 13, 2024

File Name	Description
IR0541.jpg	High-Sensitivity Image of Tank 1314 Vent
IR0542.jpg	Image of Tank 1314 Vent
MOV_0543.mp4	Video of Tank 1312 Vent
MOV_0544.mp4	Video of Tank 1312 Vent
IR0545.jpg	High-Sensitivity Image of Truck Loading Rack Vapor Recovery Hose
IR0546.jpg	High-Sensitivity Image of Truck Loading Rack Vapor Recovery Hose During Truck Loading
MOV_0547.mp4	Video of Truck Loading Rack Vapor Recovery Hose During Truck Loading
IR0548.jpg	High-Sensitivity Image of Truck Loading Rack Vapor Recovery During Hose Replacement
MOV_0549.mp4	Video of Truck Loading Rack Vapor Recovery During Hose Replacement