



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Four Penn Center – 1600 John F Kennedy Blvd
Philadelphia, Pennsylvania 19103-2852

Report Title: Geospatial Measurement of Air Pollution of PES Former Refinery
Inspection Date(s): 3/28/2023
Regulatory Program(s): SIP, Title V, NESHAP, NSPS
Company Name: Hilco Global
Facility Name: PES Former Refinery
Facility Location: 3144 W Passyunk Ave
Philadelphia, PA 19145
Latitude: 39.9147 **Longitude:** -75.2005
County/Parish: Philadelphia
AFS Number: 110000336994
Permit Number: OP20-000052
NAICS Code: 324110, 424710 **SIC:** 2911, 5171
Unique Project #: 3E23CA087A

Facility Representatives:		Point of Contact
Pat Kelly		☒
Phone: 215-339-7277	Contact: pkelly@hilcoglobal.com	
George R. Toth		☐
Phone: 215-339-7477	Contact: GToth@hilcoglobal.com	

EPA Inspectors:
Paul Arnold
Phone: 215-814-2194 Contact: Arnold.Paul@epa.gov
Parmatma Adhikari
Phone: 215-814-2161 Contact: Adhikari.Parmatma@epa.gov
Scott Yanos
Phone: 215-814-2128 Contact: Yanos.Scott@epa.gov
Alex Everhart
Phone: 919-814-2114 Contact: Everhart.Alex@epa.gov
Nicholas Bobbs
Phone: 202-564-0726 Contact: Bobbs.nicholas@epa.gov
Philip Myers
Phone: 303-877-0561 Contact: Myers.philip@epa.gov

EPA Lead Inspector

Signature

Paul Arnold

Date

Four Penn Center – 1600 John F Kennedy Blvd
(3ED21)
Philadelphia, PA 19103-2852

Supervisor

Signature

Kristen Hall

Date

Table of Contents

<u>Section</u>	<u>Page</u>
I Introduction.....	3
A Summary of the Facility.....	3
B Inspection Opening Conference.....	3
II Site Activity/Process Information.....	4
III Observations.....	4
IV Closing Conference.....	4

I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Geospatial Measurement of Air Pollution (GMAP) monitoring at PES Former Refinery (PES, Hilco or Facility) to determine if elevated levels of compounds were present. The Philadelphia Air Management Services (AMS) was notified of the inspection on March 20, 2023, via email. On March 28, 2023, EPA notified the Facility of the planned inspection via phone.

A. Summary of the Facility

The Facility is located at 3144 W Passyunk Ave, Philadelphia, PA 19145. The Facility was formerly the site of a large oil refinery and tank complex under Philadelphia Energy Solutions (PES), which was mostly used to refine high-quality gasoline. Following an explosion at the Facility on June 21, 2019, PES shut the Facility down and sold the property to Hilco. Hilco has been redeveloping the land in order to convert it into warehouses by removing the refinery and the storage tank systems. At the time of the inspection, only one tank was actively storing oil, which at this point was a four foot accumulation of sludge at the bottom of the tank.

The Facility received a Title V Operating Permit (OP20-000052) from AMS issued on October 7, 2022.

PES Former Refinery is classified as major source for Volatile Organic Compounds (VOC), SO_x, NO_x, CO, Hazardous Air Pollutants (HAP) and Particulate Matter (PM). The Facility is subject to, or potentially subject to the following federal regulations:

- 40 C.F.R. Part 60, Subpart Ka: Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984
- 40 C.F.R. 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
- 40 C.F.R. Part 60, Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
- 40 C.F.R. Part 63 Subpart R: National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)
- 40 C.F.R. Part 63, Subpart ZZZZ: National Emission Standards of Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

B. Inspection Opening Conference

At 02:54pm on March 28, 2023, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. Hilco was represented by Pat Kelly, Director of Utilities and George Toth, Vice President of Refinery Operations. EPA inspectors, Paul Arnold, Partmatma Adhikari, Nicholas Bobbs, Phil Meyers, Scott Yanos and Alex Everhart, presented

their credentials and explained the purpose of the visit was to conduct a Geospatial Measurement of Air Pollution (GMAP) monitoring. EPA inspector Nichola Bobbs explained that the GMAP vehicle has the capability to monitor Hydrogen Sulfide (H₂S), Volatile Organic Compounds (VOCs), Methane (CH₄), Sulfur Dioxide (SO₂) and Benzene (C₆H₆).

II. Site Activity/Process Description

The site activity mostly has to do with the removal of the refinery and tank farm. Most of the site has been cleared from the former refinery and tank farm with only one active tank, Tank 273. This tank is still active at the site and, as described above, only has four feet of oily sludge within the tank, according to Pat Kelly. There are pipes that connect the facility to the tank farm across the river but they have been decommissioned and cleared of any material then filled to prevent their use, according to Pat Kelly.

The opening conference concluded at 03:06pm.

III. Observations

EPA inspectors were led on a drive through of the Facility at 03:09pm by Pat Kelly of Hilco.

The first area observed was Tank 273. No significant readings were recorded by the GMAP at this location. After this, the GMAP was driven to the area where the benzene tanks were located before they were removed. No elevated readings were observed by the GMAP at this location. A designation of “elevated” means elevated concentrations of the listed pollutants the GMAP monitors were above the background level using the GMAP. Actual numeric concentration readings observed during the monitoring event were not yet verified at the time of this report, but can be shared with the Facility, once the data becomes verified.

The drive through concluded at 03:38pm

IV. Closing Conference

After the tour of the facility, EPA inspectors, and Pat Kelly 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 reports 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 in 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 03:45pm