



Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency
Region 10 – Seattle, WA

Partial Compliance Evaluation

Kinder Morgan Willbridge and Linnton Terminals

5880 NW Saint Helens Road,
Portland, OR 97210

11400 NW Saint Helens Road,
Portland, OR 97231

Inspection Date: December 5, 2024

ZACHARY HEDGPETH Digitally signed by ZACHARY HEDGPETH
Date: 2025.02.13 07:51:46 -08'00'

Report Author Signature

Date

Zach Hedgpeth, PE
Environmental Engineer
EPA Region 10

BRENDAN WHYTE Digitally signed by BRENDAN WHYTE
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Peer Review Signature

Date

Brendan Whyte
CAA Inspector
EPA Region 10

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Elly Walters
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Attachments

Attachment 1	Photo and Video Log
Attachment 2	EPA Region 10 FLIR GF320 SOP

1. Basic Facility and Inspection Information

Facility:	Kinder Morgan Willbridge Terminal 5880 NW Saint Helens Road, Portland, OR 97210	Kinder Morgan Linnton Terminal 11400 NW Saint Helens Road, Portland, OR 97231
AFS/FRS Number:	AFS: <u>OR0000004105102028</u>	FRS: <u>110048840735</u>
Permit Number:	26-2028-TV-01	
Facility Contacts:	Lane Karabaic Area Manager Kinder Morgan <u>lane_karabaic@kindermorgan.com</u> Donny Homer Air Specialist Kinder Morgan <u>donny_homer@kindermorgan.com</u>	
Agency Inspectors:	Zach Hedgpeth, PE – EPA Region 10 206-553-1217, <u>hedgpeth.zach@epa.gov</u> Brendan Whyte – EPA Region 10 (b) (6) <u>whyte.brendan@epa.gov</u> Trey Peterson – EPA Region 10 Alex Liebert – EPA Region 10 Boris Barrera – Oregon DEQ	
Inspection Date:	December 5, 2024	
Inspection Notice:	Limited notice	

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision regarding compliance with the Clean Air Act (CAA) and applicable regulations or permits, nor is it meant to be a comprehensive report of all activities and processes conducted at the facility.

2. Introduction

- a) This was a Clean Air Act (CAA) compliance inspection by the Environmental Protection Agency (EPA). The purpose of this inspection was to conduct a partial compliance evaluation (PCE) inspection of the facility. The inspection included general discussion of facility operations and a visual walk-through including observations using FLIR GF320 and Gx620 infrared gas imaging cameras¹ in addition to the observations of the inspectors.
- b) Limited notice of this inspection was provided to the facility.

3. Inspection Elements and Field Observations – December 5, 2024

- a) Around 08:15 I called Donny Homer and provided notice of the inspection.
- b) The EPA inspectors arrived onsite at the Linnton facility location at approximately 09:10. We met with Lane Karabaic, Area Manager, and Sean Gray, Operations Supervisor, in the facility parking lot.
- c) Opening Conference
 - 1. A brief opening conference was held in the facility entrance with the four EPA staff, Mr. Karabaic, and Mr. Gray. Donny Homer arrived shortly after our arrival. The EPA inspectors presented our credentials to facility staff at this time. Mr. Karabaic explained that he and Mr. Homer would serve as EPA's points of contact for the inspection.
 - 2. I began the opening conference by explaining that we (EPA inspectors) were onsite to conduct an inspection under the Federal Clean Air Act (CAA). The inspection will be a PCE centering around emissions observations using the FLIR cameras. I noted that EPA was following up based on data recently collected and submitted by the facility as part of the fence line monitoring currently underway as required by the EPA Information Request.
 - 3. Collection of photos, videos, and FLIR infrared videos were discussed, and facility personnel expressed their agreement. I also explained that copies of all recordings collected during the inspection would be transmitted to the facility along with the inspection report.
 - 4. I noted that some of the EPA equipment is not intrinsically safe, and facility staff completed the necessary documentation in their hot work permit system.
 - 5. Confidential business information (CBI) was discussed, and the EPA CBI forms were sent via email to Mr. Karabaic on 12/6/24. Facility personnel did not claim any information as CBI during the inspection.
 - 6. The opening conference ended, and the group proceeded to the field at approximately 09:20.

¹ Use of the cameras during this inspection followed U.S. EPA Region 10 Office of Environmental Assessment Standard Operating Procedure OEAFIELDSOP-111 entitled "Optical Gas Imaging with a FLIR GF320 Infrared Camera", which is included as Attachment 2.

d) Field Observations – Linnton Facility

1. Fieldwork began with a walk-through survey of selected tanks and other areas using the FLIR cameras. Mr. Karabaic, Mr. Gray, and Mr. Homer accompanied the inspectors throughout the inspection.
2. Sorbent tube monitoring Station 4 was observed, and I took photos 487-489 (see Attachment 1) showing the installation of the sorbent tube monitoring equipment.
3. The groundwater treatment system installed at the facility was observed. The contractor who maintains the system was onsite at the time of the inspection, and noted that the carbon was last changed out in September 2024.
4. The oil-water separator at the facility was observed, see photo 491. The facility staff noted that the unit is rarely used.
5. The facility staff noted that painting was ongoing, and had been initiated on November 11, 2024. We observed hand painting of piping occurring.
6. Inspector Whyte climbed Tanks T-45028 and T-59029 and observed the tanks using the FLIR camera. No emissions were visible using the FLIR camera.
7. The group departed the Linnton facility around 10:15 and drove to the Willbridge facility.

e) Field Observations – Willbridge Facility

1. The inspectors arrived at the Willbridge location around 10:30. We briefly entered the facility office and met with facility personnel in order to sign-in. We then proceeded to the field, accompanied by Mr. Karabaic, Mr. Gray and Mr. Homer.
2. Instead of walking through the facility, the inspectors drove to a gravel area outside the northwest portion of the site, near the truck scale. The facility staff opened a gate to allow us access to the facility through the security fence.
3. Sorbent tube monitoring Station 03 and the mobile meteorological station onsite were observed, and I took photos 492-495 showing the installation of the sorbent tube monitoring equipment and met station.
4. Mr. Gray explained that the facility truck rack and marine loading vapor collection are both routed to a bladder tank, which is upstream of the vapor recovery unit (VRU). The bladder tank was installed in/around 2015.
5. FLIR observations were conducted of Tank WB-123. VOC emissions were observed from the rim vents using the FLIR cameras, and Inspector Whyte recorded video 200 (see Attachment 1).
6. The group observed that trucks regularly idle near sorbent tube monitoring Station 03, as shown in photo 496.

4. Closing Conference – December 5, 2024

- a) The closing conference was held in the field at the Willbridge facility. I led the discussion, including providing an overview of the EPA Region 10 compliance process.
- b) Attendees:
 - 1. Kinder Morgan: Lane Karabaic, Sean Gray, Donny Homer
 - 2. EPA: Zach Hedgpeth, Brendan Whyte, Alex Liebert, Trey Peterson
- c) No issues were identified as potential compliance concerns under the CAA. I clarified that this may not include any additional compliance concerns that are identified post-inspection.
- d) The closing conference ended around 11:00, and the inspectors departed the facility.