



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Report Title: Clean Air Act Inspection of MIPC LLC/ Chelsea Tank Farm
Inspection Date(s): 03/08/2022
Regulatory Program(s): Title V, NESHAP, MACT, NSPS
Company Name: MIPC LLC
Facility Name: MIPC LLC / Chelsea Tank Farm
Facility Location: 920 Cherrytree Rd
Aston, PA 19014
Latitude: 39.861038 **Longitude:** -75.447189
County/Parish: Delaware
Permit Number: 23-00041
NAICS Code: 486910 **SIC:** 4613
Unique Project #: 3E22CA019A

Facility Representatives:	Point of Contact
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EPA Inspector
Signature

Parmatma Adhikari
1650 Arch Street (3ED21)
Philadelphia, PA 19103-2029

Date

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/Chelsea Tank Farm (MIPC or Facility) to verify compliance with applicable State and Federal regulations. The Pennsylvania Department of Environmental Protection (PADEP) was notified of the inspection on March 1, 2022 via email. On March 7, 2022, EPA notified the Facility of the planned inspection via phone and email. Prior to the inspection, EPA emailed a list of records for review to John Bowen (Attachment 1). These records are listed in the Records Review section of the report.

A. Summary of the Facility

The Facility is located at 920 Cherrytree Rd, Aston, PA 19014 and was constructed in the 1950's. MIPC is a subsidiary of Monroe Energy and operates approximately 52 miles of pipeline. Monroe Energy, in turn, is owned by Delta Airlines. MIPC receives Ultra Low Sulfur Diesel (ULSD) and varying grades of gasoline via pipeline from Monroe Energy's Trainer Refinery for intermediate storage prior to transporting it via pipeline to several terminals (G Street or Woodbury) or to the Buckeye or Colonial Pipelines for distribution. The Facility receives and distributes products only via pipeline and does not use truck or rail loading for liquids movement. The Facility has 12 storage tanks ranging in capacity from 150,000 BBL to 180,000 BBL, as well as an officer heater, an emergency generator, and a fire pump. The facility employs 24 full-time personnel and operate 24 hours a day, seven days a week.

The Facility received a major operating permit (Permit # 23-00041) from PADEP issued on June 27, 2018.

MIPC is classified as a major source for volatile organic compounds (VOC) and a minor source for all other criteria pollutants. The Facility is subject to, or potentially subject to the following federal regulations:

- 40 CFR 63 Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities
- 40 CFR 63 Subpart JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources
- 40 CFR 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
- 40 CFR 60 Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
- 40 CFR 60 Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

B. Inspection Opening Conference

At 10:00 am on March 8, 2022, EPA inspectors arrived at the Facility to conduct a CAA Inspection. EPA inspectors were let into the gate and proceeded to the main building to commence the opening conference. MIPC representatives were at the opening conference John Bowen, Pipeline Safety Lead, Phil Johnston and Abdul Bamgbose, Safety Manager. Also, James Layton from PADEP was present. EPA inspectors, Bruce Augustine and Parmatma Adhikari, presented their credentials and explained the purpose of the visit was to conduct a CAA inspection to determine compliance with MIPC's Title V permit and any applicable regulations. 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

Facility representatives explained that MIPC Chelsea Tank Farm receives refined petroleum products (ULSD and gasoline) from the Trainer refinery through two pipelines (8" and 11"). The Facility does not conduct any blending of product or additive addition at this site. The product leaves the refinery at 400-450psi and arrives at the tank farm at 50-70psi. The facility currently has 1.7 MM bbl petroleum product storage capacity. The current throughput of the facility is about 4 MM bbl of petroleum product per month. Product is only stored onsite for a short period of time (days) before being sent for distribution, depending on the market demand. MIPC pipes product using the East Line to the G Street Truck Terminal (85 Mbbl product storage capacity), or to the Woodbury, NJ Tank Farm (504 Mbbl product storage capacity).

MIPC has 12 storage tanks onsite. Each of the tanks has an external floating roof and a geodesic dome on top covering the tank roof. Each tank is equipped with primary and secondary mechanical seals for emission control, which are inspected visually each month. Each tank also undergoes an external inspection every five years and an internal inspection every 20 years. MIPC stated that these tanks are considered "breakout tanks" and are therefore regulated by the Pennsylvania Utilities Commission (P.U.C.). MIPC stated that Tank 711 is out of service for the installation of a double bottom floor and has been offline since 2019. The Facility expects it to be back online in 2022.

MIPC stated that all stormwater collected in onsite drains or in the tank containment area is routed to an oil/water separator. Separated water is routed to a pond and then discharged to an outfall. MIPC operates a 150kW diesel fired emergency generator which is used to provide power to the control room in the event of a power outage. The generator is tested weekly for 15 minutes and is equipped with an hour meter. The Facility also operates and 237HP diesel powered fire pump, which is also tested weekly.

The opening conference concluded at 10:48AM.

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 11:11AM by John Bowen, Phil Johnston and Abdul Bamgbose of MPIC. James Layton, of PADEP, was also present for the walkthrough. EPA inspectors noted photographs would be taken during the Facility walkthrough (Attachment 2)¹. In addition, EPA utilized a FLIR GF320 infrared camera to observe the storage tanks and associated equipment for fugitive emissions of VOC.

EPA inspectors observed the Cummins Onan emergency generator, model – DGFA-3387520. The generator was not operating during the inspection. The hour meter was observed with a total runtime of 793.8 hrs. Mr. Bowen mentioned that the facility runs the generator for about an hour and performs routine services every Monday.

EPA Inspectors were escorted to the office heater room, where EPA Inspectors observed the office heater, Williamson Model OWB-4, installed in 2008. Next to the office heater room, EPA inspectors observed the control room, where operators control the movement of products into and out of the Facility. Mr. Bowen mentioned that the control room monitors physical parameters of the petroleum product such as pressure, flowrate, etc.

The walkthrough continued toward the pumps and manifold area. EPA inspectors observed the two inlet lines and three outlet pipelines where the facility receives the petroleum product from the Trainer refinery and sends them offsite. Mr. Bowen mentioned that to transmit petroleum product to the terminals (G Street terminal and Woodbury terminal), the stored petroleum product from the tanks returns to is pumped back to this area where the pressure is increased before being transmitted offsite. Mr. Brown also mentioned the facility does not have any booster stations along the pipeline to increase the pressure.

From the pumps and manifold area, EPA and PADEP representatives were led to the tank field by Phil Johnston and Abdul Bamgbose. EPA inspectors noticed the tanks were grouped into two different locations. The first tanks area has three tanks (tank # 706, tank # 707 and tank# 715), located between the office area and main entrance of the facility. EPA inspectors first observed Tank 715, ultra-low sulfur diesel (ULSD) storage tank. EPA observed Tank 715 using the FLIR Camera and no fugitive emissions were observed at that time. Then EPA inspectors observed Tank 706, which stores ULSD. EPA inspectors climbed up to the top of Tank 706 and inspected the hatch at the connection of the geodesic dome and lip of the tank.

EPA proceeded towards the second tank area. Along the way, EPA inspectors observed the Enterprise product area. MIPC noted that Enterprise operates a natural gas metering station within a separately fenced in area on their property. MIPC does not have access to Enterprises' operation. Also, on the way to the second tank area, EPA observed the fire pump. Phil Johnston mentioned that the 237 HP fire pump was installed in 2014/2015 (he was unsure of the exact date) and used diesel fuel. He added that the facility operates the pump once a week for testing.

¹ All photographs were taken by Bruce Augustine.

EPA inspectors observed that the run hour was noted on the box panel as 97.3 hrs on January 19, 2022.

At this time, Phil Johnston returned to the office from the fire pump house to prepare the requested records. The remainder of the inspection was guided by Abdul Bamgbose. The EPA inspection team observed the remaining tanks: tank #700, tank # 701, tank # 702, tank # 703 tank # 704, tank #708, tank # 709, tank #710 and tank # 711. Tanks were arranged into two columns; #700, tank # 701, tank # 702, tank # 703, tank # 704 were in one column, and the rest of the tanks were in another column. Tank # 703 and tank # 710 stored ultra-low sulfur diesel (ULSD), the rest of the tanks held gasoline. Tank # 711 has been out of service since 2019. The tanks were observed with the FLIR Camera for fugitive emissions.

The walkthrough concluded at 12:34 PM.

IV. Records Review

The records review commenced immediately after the plant walkthrough at 12:36 PM. EPA inspectors reviewed documents requested in the March 7, 2022, email to John Bowen. Records were provided at the time of the inspection by Phil Johnston. Below are the records requested and what was provided during the inspection:

1. EPA requested and MIPC provided a copy of the facility plot plan during the inspection.
2. EPA requested copies of emission statements provided to PADEP for 2019-2021. They indicated that PADEP's emission reporting site (Greenport) is down until April 1, 2022, however, EPA received copies of emission statements for 2019 and 2020 electronically on March 14, 2022.
3. EPA requested calculations of the potential to emit for NO_x, CO, VOC, and hazardous air pollutants (HAP). EPA received these records electronically on March 14, 2022, including the derivation of emission factors used.
4. EPA requested MIPC provide the hours of operation (monthly) for the years 2018-present for each engine onsite. EPA received these records electronically on March 14, 2022.
5. EPA requested copies of the maintenance records (routine oil change, filter change, etc,) for each engine onsite from 2018 to the present. EPA received copies of these records electronically on March 14, 2022.
6. EPA requested the amount of fuel (diesel, #2 oil, etc.) combusted in each engine monthly for 2019-present and copies of fuel delivery receipts with fuel sulfur (ppm). EPA received copies of these records electronically on March 14, 2022.
7. EPA requested copies of any Notice of Compliance Status, Initial Notifications, or Semiannual/annual reports submitted to either PADEP or EPA for NSPS Subpart IIII, JJJJ, MACT Subparts ZZZZ or BBBB. EPA received electronic copies of these reports for the previous three years on March 14, 2022
8. EPA requested that for each storage tank onsite provide:
 - a. The capacity (gallons or barrels);
 - b. Material stored in each tank and vapor pressure of the material;

- c. Monthly throughput for each tank from 2018-present;
- d. Any periods where tank was out of service or roof was landed from 2018-present;
- e. Records of tank inspections;
- f. Records of any leaks identified during inspections and corrective actions;
- g. Type of seals used.

EPA received these records electronically on March 14, 2022. This includes a manufacturer description of the seals used on the tanks to minimize emissions.

V. Closing Conference

After the records review, EPA held a brief closing conference with MIPC representatives to discuss the observations and to discuss next steps. EPA noted that they would review the information provided by MIPC both during and after the inspection. EPA also noted that an inspection report will be issued within in 60 days of the inspection, with a copy to the State. This report will not have a determination of violation or compliance and will be based on the observations made during the inspection. Simultaneously, EPA will perform a detailed review of records and may have additional questions. The inspection concluded at 1:15 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.

- While EPA did not identify any specific issues to MIPC during the inspection, a thorough review of the records requested during the inspection and later provided to EPA by MIPC is being conducted and additional questions may be generated by EPA.

VI. List of Attachments

Attachment 1: Email correspondence to John Bowen of records requested to review during inspection

Attachment 2: Photo Log

ATTACHMENT 2: PHOTO LOG

Facility: MIPC LLC/ Chelsea Tank Farm

Location: 920 Cherry Tree Rd, Aston, PA

Inspection Date: 3/08/2022

EPA Inspector(s): Bruce Augustine & Parmatma Adhikari

Photographer: Bruce Augustine



Photo Number: 1

Photo Description: Cummins Emergency Generator Panel w/hour meter



Photo Number: 2

Photo Description: 150kW Emergency Generator

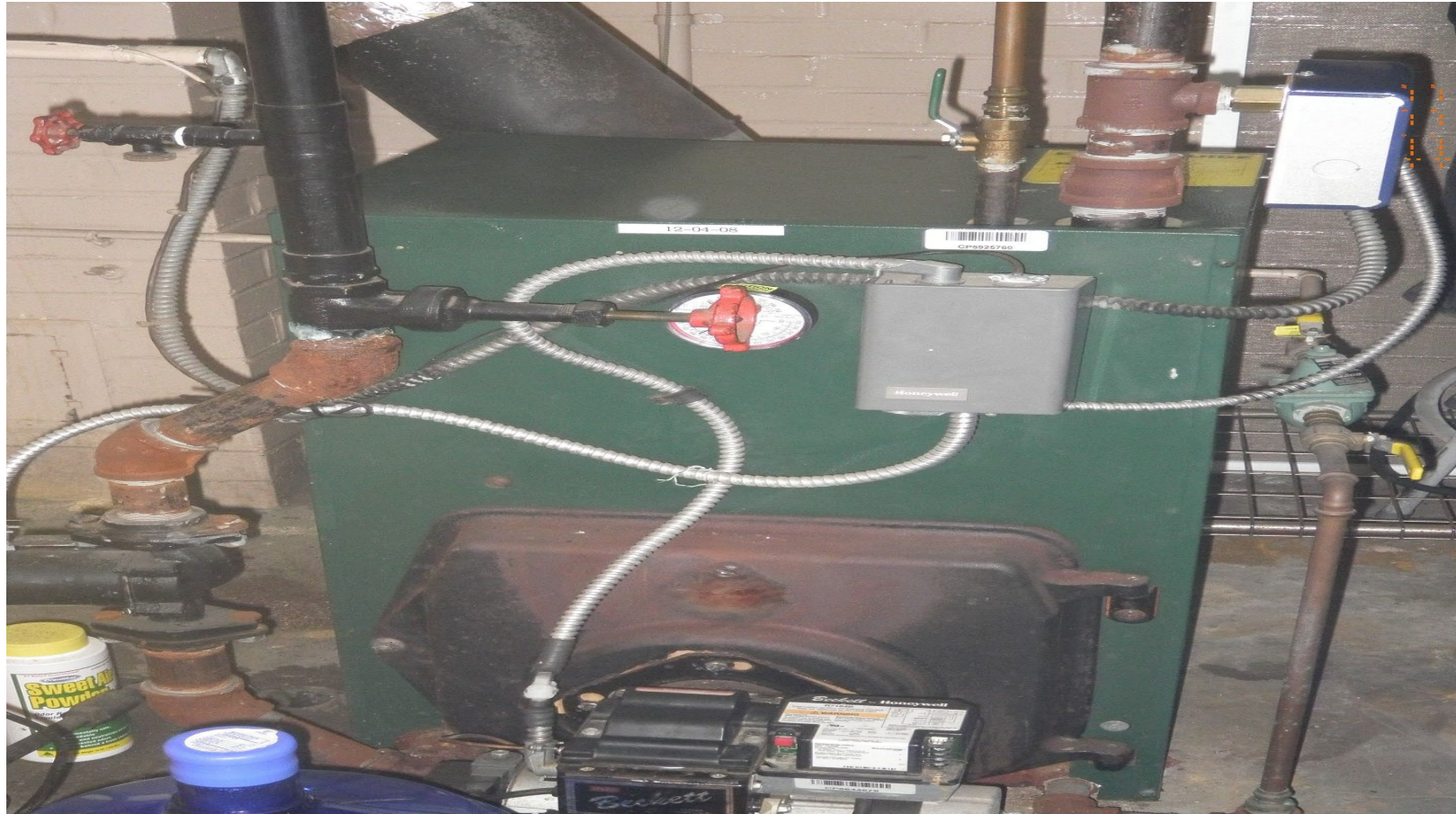


Photo Number: 3

Photo Description: 0.145MMBtu/hr Office Heater



Photo Number: 4

Photo Description: Inlet/Outlet Piping



Photo Number: 5

Photo Description: Piping for movement to and from Tanks



Photo Number: 6

Photo Description: Pipe Rack



Photo Number: 7

Photo Description: Ultra Low Sulfur Diesel Storage Tank 706



Photo Number: 8

Photo Description: 237HP Fire Pump Engine



Photo Number: 9

Photo Description: Gasoline & ULSD Storage Tanks



Photo Number: 10

Photo Description: Gasoline Storage Tanks 701 & 702

Adhikari, Parmatma

From: Augustine, Bruce
Sent: Monday, March 7, 2022 9:00 AM
To: john.bowen@monroe-energy.com
Cc: Layton, James; Adhikari, Parmatma
Subject: EPA Inspection of MIPC Tank Farm

John,

Per our conversation this morning, EPA Region 3 is planning to conduct a Clean Air Act inspection of the MIPC tank farm in Aston on Tuesday March 8th. We will begin the inspection at 10:00AM. It will be myself and Parmatma Adhikari from and at least one inspector from PADEP. The inspection will consist of an opening meeting to discuss the current facility operations followed by a walkthrough of the site. As I mentioned, during the walkthrough EPA will take photographs and use a FLIR IR camera to observe emission sources. If any hot work permits are needed, please begin that process in advance. Site PPE requirements include hard hat, safety glasses, safety shoes and FR clothing.

In an effort to facilitate the inspection, please have copies of the following records available:

1. Facility plot plan.
2. Emission statements submitted to PADEP for 2019-2021
3. Calculations of the potential to emit for NOx, CO, VOC, and hazardous air pollutants (HAP).
4. Hours of operation (monthly) for the years 2018-present for each engine onsite.
5. Maintenance records (routine oil change, filter change, etc.) for each engine onsite from 2018 to the present.
6. Amount of fuel (diesel, #2 oil, etc.) combusted in each engine monthly for 2019-present and copies of fuel delivery receipts with fuel sulfur (ppm).
7. Copies of any Notice of Compliance Status, Initial Notifications, or Semiannual/annual reports submitted to either PADEP or EPA for NSPS Subpart IIII, JJJJ, MACT Subparts ZZZZ or BBBBBB.
8. For each storage tank onsite provide:
 - a. The capacity (gallons or barrels);
 - b. Material stored in each tank and vapor pressure of the material;
 - c. Monthly throughput for each tank from 2018-present;
 - d. Any periods where tank was out of service or roof was landed from 2018-present;
 - e. Records of tank inspections;
 - f. Records of any leaks identified during inspections and corrective actions;
 - g. Type of seals used.

Electronic copies of these records are preferred and I can provide a link to upload the records. Please let me know if you have any questions. I can be reached at 215-814-2131.

Bruce J. Augustine
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