



Region 2 Enforcement and Compliance Assurance Division

Air Compliance Branch

CAA Inspection Report

Inspection Date: April 29, 2022

Facility Name: Puma Energy Caribe LLC – Guaynabo 2 Terminal

Facility Address: PR-28 Km 0.6, BO Pueblo Viejo, Guaynabo, Puerto Rico 00966

ICIS-Air ID #: PR0000007203300052

Facility Contact: Domingo Perez Terminal Superintendent Domingo.Perez@pumaenergy.com

EPA Lead Inspector: Julian Velez CAA Inspector Velez.Julian@epa.gov

EPA Asst. Inspector: Ralph Lonergan CAA Inspector Lonergan.Ralph@epa.gov

Alex Rivera CAA Inspector Rivera.Alex@epa.gov

Richard Kan CAA Inspector Kan.Richard@epa.gov

State Inspector(s): N/A

Other Inspector(s): N/A

Pertinent Regulatory Requirements

- 40 CFR 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 CFR Part 60 Subpart XX – New Source Performance Standards (NSPS) of Performance for Bulk Gasoline Terminals.
- 40 CFR Part 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.
- Puerto Rico – Regulations for the Control of Atmospheric Pollution (RCAP).

Summary of Observations

Environmental Protection Agency (EPA) inspectors Julian Velez, Alex Rivera, Richard Kan, and Ralph Lonergan arrived at the Puma Energy Caribe – Guaynabo 2 Terminal at 9:40 am. The inspectors signed the visitor’s log and presented credentials at the entry-security office. The opening meeting started at 10:00 am with Domingo Perez (Terminal Superintendent), Raquel Velazquez (EHS Supervisor), and Rosa Cruz (EHS Manager-Guaynabo

Terminal). Mr. Perez provided a safety briefing to the inspectors. Inspector Velez explained the purpose of the inspection and provided an outline of the areas that the inspection would focus on. Inspector Velez informed that an infrared (IR) camera and a MultiRae photoionization detector (PID) was going to be used to survey the facility's truck loading rack area and the gasoline storage tanks. Inspector Velez asked Mr. Perez for a list of tanks that were in gasoline service and the schedule for the trucks that were loading gasoline that day, and Mr. Perez also explained that the products stored at the Terminal were regular gasoline, premium gasoline, diesel, jet fuel, and aviation gas. The tanks in gasoline service at the time of the inspection were 23908 and 27692. Tank 23909 was out-of-service. Mr. Boris Salazar (Operations Superintendent) joined the group in the conference room and projected a video that Puma uses to train the trucks drivers for the process of loading gasoline. Mr. Salazar explained that three (3) out of six (6) bays can load gasoline and that bay #2 was out-of-service. The EPA inspectors could observe in the video that Puma uses TWIC cards and loading cards and only authorized drivers are allowed to load gasoline. Puma also uses a TMS system to verify that a tank truck meets all requisites and inspections to load gasoline. Drivers take an initial training that covers safety and operational requirements for the process of loading gasoline.

The field tour started at 10:30 am with Mr. Perez and Ms. Velazquez. The inspectors decided to start at the tank farm since there were no trucks loading gasoline at this time. The temperature was 83 °F and the wind speed was 7-9 mph.

- Tank 23908: Internal floating roof (IFR), storing premium gasoline.
Approximately ½ full.
IR camera video #563 at 10:35 am, continuous leak from North side vent.
PID reading: 10 ppb VOC.
- Tank 27692: External floating roof (EFR), storing regular gasoline.
Approximately ¾ full.
IR camera video #567 at 11:07 am, continuous emissions from vacuum breaker on North side of tank visible in HSM and Auto modes.
Maximum PID reading 3500 ppb VOCs.
IR camera video #568 at 11:16 am, continuous emissions from vacuum breaker on North side of tank, visible in HSM and Auto modes.
PID alarm was activated, and inspectors left the area for safety reasons.
- Truck Loading Rack
Bay #1: Truck loading 9,000 gallons of regular gasoline and 1,000 gallons of premium gasoline.
License plate: 146516A
No emissions were detected from this tank truck with the IR camera.
- Vapor Recovery Unit (VRU) Area
The inspectors noted that the PID had elevated readings (> 35,000 ppb VOC), and after scanning the area with the IR camera, discovered emissions coming from, what was described by facility representatives, as a knock-out drum. Mr. Perez and Mr. Salazar explained that this underground knock-out drum collects gasoline and liquid from the recovery process (condensation).
IR camera videos #569 at 11:40 am, #571 at 11:44 am, and #572 at 12:02 pm.

Inspector Velez entered the VRU control room; at the time of the inspection bed #1 was regenerating and bed #2 was actively absorbing hydrocarbons. The instantaneous reading was 0.01% as propane (C₃H₈), and the 1-hour average was 0.27% as propane (C₃H₈). No emissions were detected from the VRU with the IR camera.

- Truck Loading Rack

Bay #1: Truck loading gasoline

License plate: 55389A

Inspectors could observe that VRU hose was connected.

IR video #573 at 12:11 pm; leak on tank truck – back elbow piping.

PID maximum reading was 17,000 ppb VOCs.

IR camera video #574 at 12:14pm; leak on top of tank truck by section #3.

PID reading 1,600 ppb VOCs.

The field tour ended at 12:20 pm and the inspectors along with Puma's representatives returned to the conference room for the closing meeting.

Inspector Velez thanked Mr. Perez, Ms. Cruz, and Ms. Velazquez for accommodating the EPA inspection at the Terminal. Inspector Velez also provided a summary of the IR camera videos taken during the field tour and mentioned that he would send Puma copies of the videos. Inspector Velez also requested the following documents to be provided as PDF via email to complete the inspection:

1. List of gasoline tanks in operation during EPA's April 29, 2022 inspection, providing tank #, type of product, quantity stored, tank type/construction year, roof material, roof support, storage capacity, floating roof installation date, out of service inspection date.
2. Latest API-653 inspection report for tanks that were in gasoline service during EPA's April 29, 2022 inspection.
3. Throughput data (monthly) for EFR Tanks for 2021 and year-to-date 2022 through April.
4. Facility wide VOC and HAPs calculations for 2020 and 2021.
5. Last performance test report for the VRU. Please provide dates along with documentation for the most recent replacement of the carbon beds.
6. Calculations and explanation on how the CMS data correlates to the unit of the standard (35 mg/L) for Guaynabo Terminal.
7. Monthly gasoline throughput for the truck loading rack for 2021 and 12-month rolling year-to-date through April 2022.
8. Provide documentation of annual vapor tightness certification for tank truck with license plate 146516A, which was loading gasoline at Bay #1 during EPA's inspection.
9. Inventory of emergency generators/fire pumps (make, model, manufacturer, emission compliance requirements). Please include hp, installation date, hours/year of operation, type of fuel, and sulfur percentage of fuel. Please provide the total hours of operation for 2020, 2021, and up-to-date 2022.

This concluded the inspection, and the EPA inspectors left the facility at approximately 1:00 pm.

*EPA Inspector Velez sent copies of the IR camera videos to Mr. Domingo Perez and Ms. Raquel Velazquez on May 16, 2022.

Lead Inspector's Name: Julian Velez

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VELEZ
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JULIAN VELEZ
SANCHEZ
Date: 2022.06.21
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Lead Inspector

Assisting Inspector's Name: Ralph Loneragan

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RALPH LONERAGAN
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Assisting Inspector

Assisting Inspector's Name: Alex Rivera

**ALEX
X RIVERA** Digitally signed by
ALEX RIVERA
Date: 2022.06.21
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Assisting Inspector

Supervisor's Name: Gaetano LaVigna

**HARISH
X PATEL** Digitally signed by
HARISH PATEL
Date: 2022.06.23
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Supervisor