



Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency
Region 10 – Seattle, WA

Partial Compliance Evaluation

Chevron U.S.A., Inc. Willbridge Distribution Center

Inspection Date: June 24, 2024

ZACHARY HEDGPETH Digitally signed by ZACHARY HEDGPETH
Date: 2024.08.29 09:35:12 -07'00'

Report Author Signature

Date

Zach Hedgpeth, PE
Environmental Engineer
EPA Region 10

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Date

Andrew Gregory
CAA Inspector
EPA Region 10

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Manager Signature

Date

Elly Walters
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1. Basic Facility and Inspection Information

Facility Location: Chevron U.S.A., Inc.
Willbridge Distribution Center
5531 NW Doane Ave.
Portland, OR 97210

AFS Number: OR0000004105102027

Permit Number: Title V Operating Permit #26-2027-TV-01
Oregon DEQ

Facility Contact: Dean Meier – Lead Operations Support Specialist
503-221-7767, Dean.Meier@Chevron.com

Agency Inspectors: Zach Hedgpeth, PE – EPA Region 10
206-553-1217, hedgpeth.zach@epa.gov

Andrew Gregory – EPA Region 10
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Dan Heins – EPA OECA
Steve Rapp – EPA OECA
Phil Myers – EPA NEIC

Inspection: June 24, 2024

Inspection Report: August 29, 2024

Inspection Notice: Unannounced

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.

1. 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 a general discussion of facility operations, a visual walk-through including observations using FLIR GF320 infrared gas imaging cameras, and measurement of internal floating roof headspace using a QRAE 3 handheld gas detector capable of measuring lower explosive limit (LEL), in addition to the observations of the inspectors.
- b) Advance notice of this inspection was not provided to the facility.

2. Inspection Elements and Field Observations – June 24, 2024

- a) The EPA inspectors arrived onsite at approximately 08:15. I pushed the call button at the entrance near the south parking lot and asked for Shane Partain, the facility HSE Specialist who had been originally identified as a facility contact. After a few minutes, Jim Weider, Production Supervisor at the facility, escorted the EPA inspectors to a facility conference room.
- b) Opening Conference
 - 1. In the conference room, we met with Mr. Weider and Dean Meier, Lead Operations Support Specialist at the facility. The EPA inspectors presented our credentials to facility staff at this time. Mr. Meier explained that he would serve as EPA's point of contact for the inspection.
 - 2. I began the opening conference by explaining that we (EPA inspectors) were onsite to conduct an unannounced inspection under the Federal Clean Air Act (CAA). The inspection will be a PCE centering around emissions observations using the FLIR cameras and LEL measurements using the QRAE 3 detector.
 - 3. Collection of photos, videos, FLIR infrared videos were discussed, and facility personnel expressed their agreement. I explained that copies of all recordings collected during the inspection would be transmitted to the facility along with the inspection report.
 - 4. Since some of the EPA equipment is not intrinsically safe, the facility required a hot work permit to be issued for the inspection work. Mr. Meier entered the necessary information into the facility computerized system in order to produce the permit.
 - 5. Confidential business information (CBI) was discussed, and I gave the EPA CBI forms to Mr. Meier. Facility personnel did not claim any information as CBI during the inspection.
 - 6. We requested a facility site map, and these were provided. Copies are included as Attachment 3 to this report, including some annotations made by the EPA inspectors during the inspection.
 - 7. Mr. Meier and Mr. Weider explained that the facility currently has no marine loading scheduled. Marine loading generally occurs on Saturdays, approximately every two weeks. Chevron allows Zenith Energy (located nearby) to use their

marine loading facilities. The facility has the capability of allowing other nearby facilities to also use the marine loading facilities, such as Kinder Morgan. In reviewing an aerial photo of the marine loading facilities, there are three parallel docks with the following ownership: the furthest upstream dock is owned by Philips 66, the center dock is owned by Chevron, the furthest downstream dock is owned by Kinder Morgan.

8. The facility has rail loading and receiving facilities, which are used for diesel and lubricants.
9. A site safety orientation was conducted, led by Mr. Meier.
10. The opening conference ended, and the group proceeded to the field at approximately 09:15.

c) Field Observations

1. Fieldwork began with a visual survey of the facility tanks using the FLIR cameras. Mr. Weider and one of the operations staff (Colby) accompanied the inspectors at the start of the fieldwork, and Mr. Meier joined later as we conducted LEL measurements on Tank 48.
2. FLIR observations began in the southeast portion of the site, near Tank 60. Inspectors Myers and Gregory each operated a GF320 in order to screen for visible emission sources. The group climbed Tank 60 and screened that tank as well as others visible from that vantage point for emissions sources. No FLIR videos were recorded from the Tank 60 walkway although I did note some gasoline odor.
3. After climbing down from Tank 60, visible emissions were observed from the Tank 48 rim vents using the FLIR camera. Phil Myers recorded an infrared video of the emissions from the rim vents (see Attachment 1). An additional infrared video was recorded of emissions from Tank 48 but unfortunately, this video file has been corrupted and will not play.
4. During field observations, Mr. Weider stated, when asked, that the facility was not receiving product from the pipeline at the time of the inspection. He further stated that the facility was scheduled to receive 65,000 barrels of regular unleaded gasoline on Thursday of that week from approximately noon – 10 pm.
5. The EPA inspectors conducted measurement of the LEL on Tank 48. The measurement was conducted by lowering a teflon sampling line through the rectangular hatch in the southwest portion of the fixed roof to within approximately 1-2 feet above the floating roof in order to measure the concentration in the tank head space. All readings were recorded at 0% of the LEL over a period of 5 minutes. The detailed data sheet is included as Attachment 4.
6. During the field observations, Mr. Meier stated that Tank 48 contains a mixture of gasoline, diesel, and water, but is probably mostly gasoline.
7. The inspectors completed the field portion of the inspection and returned to the facility office around 11:15.

3. Closing Conference – June 24, 2024

- a) The closing conference was held in the facility conference room. I led the discussion, including providing an overview of the EPA Region 10 compliance process. Upon return to the conference room, an informal bump check was performed on the QRAE detector using hand sanitizer, and the instrument responded.
- b) Attendees:
 - 1. Chevron: Dean Meier, Jim Weider
 - 2. EPA: Dan Heins, Steve Rapp, Phil Myers, Andrew Gregory, Zach Hedgpeth
- c) The EPA records request (see Attachment 2) was reviewed and discussed. The printed request was modified to exclude past lubricant products, based on Mr. Meier's statement that this would encompass hundreds of different products over the past five years.
- d) The following issue was identified as a potential compliance concern under the CAA. I clarified that this item did not necessarily constitute a violation and may not include any additional compliance concerns that are identified post-inspection.
 - 1. Visible emissions using the FLIR camera from Tank 48. It was noted that all LEL measurements on this tank were 0%.
- e) The closing conference ended around 11:30, and the inspectors departed the facility.