



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

Clean Air Act Inspection Report

Report Date: Draft: October 18, 2024
Final: October 28, 2024

I. Background

EPA Inspectors: Grace Perry, Environmental Engineer, Air Compliance Section, Region 1
Steve Rapp, Environmental Engineer, Air Enforcement Division,
Office of Enforcement and Compliance Assurance (OECA)

GRACE PERRY
Digitally signed by GRACE PERRY
Date: 2024.10.28 09:37:59 -04'00'

EPA Reviewer: John Melcher, Senior Enforcement Coordinator, Air Compliance Section, Region 1

Inspection Date: October 8, 2024

JOHN MELCHER
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Date: 2024.10.28 09:52:21 -04'00'

Facility Name: R. M. Packer Company, Inc.

Facility Location: 188 Beach Road, Tisbury, MA 02568

Mailing Address: PO Box 308, Vineyard Haven, MA 02568

ICIS Air ID#: MA0000002512000397

Disclaimer:

Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

Inspection Attendees

Name	Title	Organization
Grace Perry	Environmental Engineer	U.S. EPA Region 1
Steve Rapp	Environmental Engineer	U.S. EPA OECA
Joe Canzano	Environmental Engineer	U.S. EPA Region 1
Newt Tedder	Physical Scientist	U.S. EPA Region 1
Margarita Chatterton	Environmental Engineer	U.S. EPA Region 1
Daniel Gavin	Multimedia Inspector	MassDEP
Jenifer Carter	Multimedia Inspector	MassDEP
Glenn DeBlase	Compliance Officer	R.M. Packer
Susan Courtney	Safety Consultant	John W. Furrh Associates
Skip Bailey	Driver	R.M. Packer

Facility/Process Description:

The R.M. Packer Company in Tisbury, Massachusetts, (“Packer,” or “the facility”) is a petroleum distribution and storage facility that provides services to businesses and residents of Martha’s Vineyard. The facility stores and distributes diesel, gasoline, and fuel oil. The terminal is equipped with a vapor recovery unit (“VRU”) to control emissions from the storage and distribution of gasoline. The facility is owned by Ralph Packer and was purchased in 1979 from Texaco.

Potentially Applicable Federal Regulations:

- 40 CFR Part 60 Subpart XX: Standards of Performance for Bulk Gasoline Terminals That Commenced Construction, Modification, or Reconstruction After December 17, 1980, and On or Before June 10, 2022
- 40 CFR Part 63 Subpart BBBB: National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities
- R.M. Packer Company, Inc.: Court-Ordered Injunctive Relief, Filed 9/27/2019

State Air Regulations:

310 C.M.R. 7.24 (2): Bulk Terminals and Bulk Plants

II. Inspection

A. Opening Conference:

Inspectors from the United States Environmental Protection Agency (“EPA”) and Massachusetts Department of Environmental Protection (“MassDEP”), i.e., “the inspectors,” arrived at the facility office at approximately 9:15 A.M. on October 8, 2024. EPA had announced the inspection to the facility on September 23, 2024. The inspectors were greeted by Mr. DeBlase and Packer’s consultant, Ms. Courtney. The inspectors presented their credentials to Mr. DeBlase and Ms. Courtney.

The EPA Clean Water Act inspectors explained the purpose of their inspection. See separate inspection report for details.

The EPA Clean Air Act inspectors, Inspector Rapp and Inspector Perry, explained that the purpose of their inspection was to inspect the gasoline loading equipment and VRU, as well as the recently installed lockout system. Inspector Rapp asked if it would be possible for Packer to demonstrate the conditions that result in the lockout of the gasoline loading from the storage tank to the delivery truck. Mr. DeBlase agreed and arranged for a truck to be loaded.

The MassDEP inspectors, Mr. Gavin and Ms. Carter, explained that they were not at the site to inspect but to observe the equipment related to the vapor recovery system because Packer had recently submitted a permit application to MassDEP to change the system from VRU to a vapor control unit (“VCU”).

B. Walk Through:

Mr. DeBlase led the inspectors to the fuel loading area where they were met by Packer’s fuel technician, Skip Bailey. The loading area includes four fuel storage tanks and equipment for loading fuel products into trucks. Tank 4 storing gasoline has a volume of approximately 100,000 gallons. The tanks storing ultra-low sulfur diesel fuel (“ULSD”) and heating fuel, Tanks 2 and 3, respectively, each have volumes of approximately 60,000 gallons. Tank 1 storing distillate fuel oil (“#2 oil”) has a volume of approximately 100,000 gallons. See photos DSCN1742.JPG and DSCN1743.JPG. Packer also has a barge docked at the site with a volume of approximately 120,000 gallons. See photos DSCN1768.JPG and DSCN1769.JPG.

Mr. Bailey explained that the loading rack includes different colored loading pipes associated with specific types of fuels: green for diesel fuel, red for dyed heating oil, yellow for #2 oil, and white for gasoline. See photo DSCN1745.JPG. In the loading area, the inspectors observed thermal expansion valves and tanks for the diesel/fuel oils and

gasoline. See photos DSCN1751.JPG, DSCN1752.JPG, and DSCN1758.JPG. Mr. Bailey explained that the diesel/fuel oils expansion tank is disconnected and the valves plugged but Packer is waiting for an electrician to decommission them before they remove them. He said the new system released pressure directly back to the storage tanks. He said the gasoline thermal expansion system was still in service and would not be changed.

Inspector Rapp asked Mr. Bailey to explain how the gasoline loading system worked, including the VRU, and for a demonstration of the recently installed lockout system ("Scully system"). Mr. Bailey showed the inspectors the facility's new "Toptech EXI" fuel loading control system which requires the operator to log in with a key card and PIN. He said it was similar to the type of system used at the larger gasoline distribution terminals, such as the Motiva terminal in Providence. Mr. Bailey showed the inspectors that the VRU was operational which was indicated by a green light above the equipment. See photo DSCN1748.JPG. He said that if the VRU was not fully operational, the red light next to the green would turn on.

Mr. Bailey inserted a key card and logged into the Toptech system. He set the system to load 3,000 gallons of gasoline from the storage tanks to the truck. He showed the inspectors that the screen indicated an alarm, "MTR ALARM," because the truck was not connected to the control system. Mr. Bailey showed the inspectors the vapor return line which must be connected from the rack to the truck for the fuel to flow. Because the line was not connected, the screen indicated that the vapor return line was not connected ("CHECK VR"). See photo DSCN1749.JPG.

Mr. Bailey showed the inspectors the tank truck's computer system which also must be connected to the fuel loading rack's control system for gasoline to flow from the storage tank to the truck. See photo DSCN1755.JPG. He explained that given the vapor return line and electronic probe were not connected to the control system, gasoline could not be loaded into the truck, i.e., it was locked out.

Mr. Bailey said there were three steps to loading a gasoline truck: vent; ground; and load. He proceeded to vent the truck by removing the cap on the opening the vapor return valve on the side of the truck. The inspectors smelled a rush of gasoline vapors exiting the truck and asked if any of Packer's trucks had any kind of valve to prevent venting directly to the atmosphere when the vent cap was removed and before the vapor return line was connected. Mr. Bailey said he did not believe any of Packer's trucks had such a valve. He then attached the vapor return line to valve from the loading rack to the truck vent. See photo DSCN1753.JPG. Mr. Bailey explained the vapor return system was a passive system relying on the liquid entering the truck's tank to push the vapors out into the line.

Next, Mr. Bailey connected the electronics probe from the system to the truck. See photo DSCN1755.JPG. Mr. Bailey then attached the gasoline transfer pipe to the truck. See photos DSCN1756.JPG and DSCN1757.JPG. Mr. Bailey pointed out the two green

lights in the front of the Scully system panel indicating that the required connections were in place to allow gasoline to flow into the truck. See photo DSCN1754.JPG. Mr. Bailey said that prior to the installation of the Toptech and Scully equipment, gasoline could be loaded into a truck even if the vapor return line was not connected or the VRU was not operational. He said that the Toptech system allowed them to track the flow of gasoline to the trucks more accurately than previously which allowed them to fill the trucks closer to the maximum without risk of overflow.

Inspector Rapp asked to see the VRU system. Mr. Bailey explained the VRU includes two carbon adsorption beds (Carbon Beds A and B) designed to adsorb and collect gasoline vapors generated during transfer from the storage tanks to the trucks. See photos DSCN1760.JPG, DSCN1761.JPG, and DSCN1762.JPG. He said vapors are sent to one of the carbon beds where the vapors are adsorbed onto activated carbon. He said while one carbon bed is adsorbing vapors, the second carbon bed is offline and is regenerated. He said the vapors trapped in the closed carbon bed are pulled by vacuum pump and sent to an absorption tower which uses liquid gasoline taken as the absorption liquid. See photos DSCN1759.JPG, DSCN1763.JPG, DSCN1764.JPG, and DSCN1765.JPG. He explained that the carbon beds switch to active or off-line based on a timer rather than by process parameters but the process can be controlled manually from the control panel. See photo DSCN1766.JPG. Mr. Bailey said that Packer often leaves the VRU system running after loading is completed in order for the beds to cycle through a few times which helps keep the carbon performing well.

Mr. Bailey said that the facility currently has a lower throughput compared to historical volumes. He said that currently the typical throughput during the summer months is 50,000 gallons per week and in winter it is 30,000 gallons per week. He said the lower throughput also allows the carbon beds to regenerate more thoroughly, leading to lower emissions to the atmosphere.

Inspector Rapp asked Mr. Bailey how often the carbon material in the VRU beds is exchanged. He said the carbon was not changed on a schedule but rather based on when vapor removal performance shows it is needed.

Inspector Rapp asked Mr. Bailey about the “electrical problems” indicated in the October 2023 semi-annual report from Packer. Mr. Bailey said that the VRU is an old system and there were several solenoids and valves that needed repair or replacement but the system is now working well. Inspector Rapp asked Mr. DeBlase about the VRU’s program logic controller (“PLC”) issues noted in the Spring 2024 semi-annual report, specifically if the PLC had needed to be replaced in order for the lockout system to work. Mr. DeBlase said that they resolved the issues and were able to continue using the original PLC.

Mr. DeBlase noted that although the VRU is functioning well currently, Packer has applied for a permit at MassDEP to allow the replacement of the VRU with a vapor control unit ("VCU"). He said they are waiting for a response from MassDEP.

C. Closing Conference:

The inspectors, Mr. DeBlase and Ms. Courtney returned to Mr. DeBlase's office for a closing conference. The inspectors thanked Mr. DeBlase and the other facility representatives for their time and the information they shared, particularly for the demonstration of the VRU, gasoline loading, and lockout systems.

The inspectors explained they will write an inspection report documenting their observations which they will share within 70 days from the inspection. They said they will contact Mr. DeBlase and Packer if they have any additional questions.

The inspectors left the facility at approximately 12:15 P.M.

Appendix: Photo Log:

R.M. Packer, Co., Inc.

October 8, 2024

All photographs taken by Steve Rapp, EPA

Number	Image Identification	Description	Time (A.M.)
1	DSCN1742.JPG	R.M. Packer facility from the water	8:48
2	DSCN1743.JPG	Fuel storage tanks (from left to right: 1, 2, 3, 4)	9:19
3	DSCN1744.JPG	Gasoline storage tank	9:19
4	DSCN1745.JPG	Storage tanks, piping, and loading equipment	9:24
5	DSCN1746.JPG	Delivery truck	9:24
6	DSCN1747.JPG	Facility sign	9:27
7	DSCN1748.JPG	Vapor recovery unit indicator light	9:41
8	DSCN1749.JPG	Toptech EXI fuel loading control system screen	9:48
9	DSCN1750.JPG	Toptech EXI fuel loading control system screen	9:48
10	DSCN1751.JPG	Thermal expansion tank for diesel and fuel oils	9:50
11	DSCN1752.JPG	Thermal expansion tank for gasoline	9:50
12	DSCN1753.JPG	Vapor return line on truck	9:52
13	DSCN1754.JPG	Control panel of Scully lockout system	9:52
14	DSCN1755.JPG	Truck computer and electronic hookup	9:53
15	DSCN1756.JPG	Gasoline line connected to truck	9:57
16	DSCN1757.JPG	Gasoline loading rack (white)	9:57
17	DSCN1758.JPG	Valve on thermal expansion line	10:00
18	DSCN1759.JPG	Gasoline lines from Tank 4	10:06
19	DSCN1760.JPG	Carbon adsorber beds (A on left, B on right)	10:09
20	DSCN1761.JPG	Carbon bed A	10:10
21	DSCN1762.JPG	Carbon bed B	10:10
22	DSCN1763.JPG	Absorption tower (center)	10:10
23	DSCN1764.JPG	Vacuum pump (yellow)	10:12
24	DSCN1765.JPG	Absorption tower	10:13
25	DSCN1766.JPG	VRU control panel	10:15
26	DSCN1767.JPG	Gasoline storage tank behind berm wall	10:38
27	DSCN1768.JPG	Fuel barge parked at dock	10:39
28	DSCN1769.JPG	Fuel barge parked at dock	10:59

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1	DSCN1742.JPG	R.M. Packer facility from the water	8:48



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2	DSCN1743.JPG	Fuel storage tanks (left to right: 1, 2, 3, 4)	9:19



Number	Image Identification	Description	Time (A.M.)
3	DSCN1744.JPG	Gasoline storage tank (Tank 4)	9:19



Number	Image Identification	Description	Time (A.M.)
4	DSCN1745.JPG	Storage tanks, piping, and loading equipment	9:24



Number	Image Identification	Description	Time (A.M.)
5	DSCN1746.JPG	Delivery truck	9:24



Number	Image Identification	Description	Time (A.M.)
6	DSCN1747.JPG	Facility sign	9:27



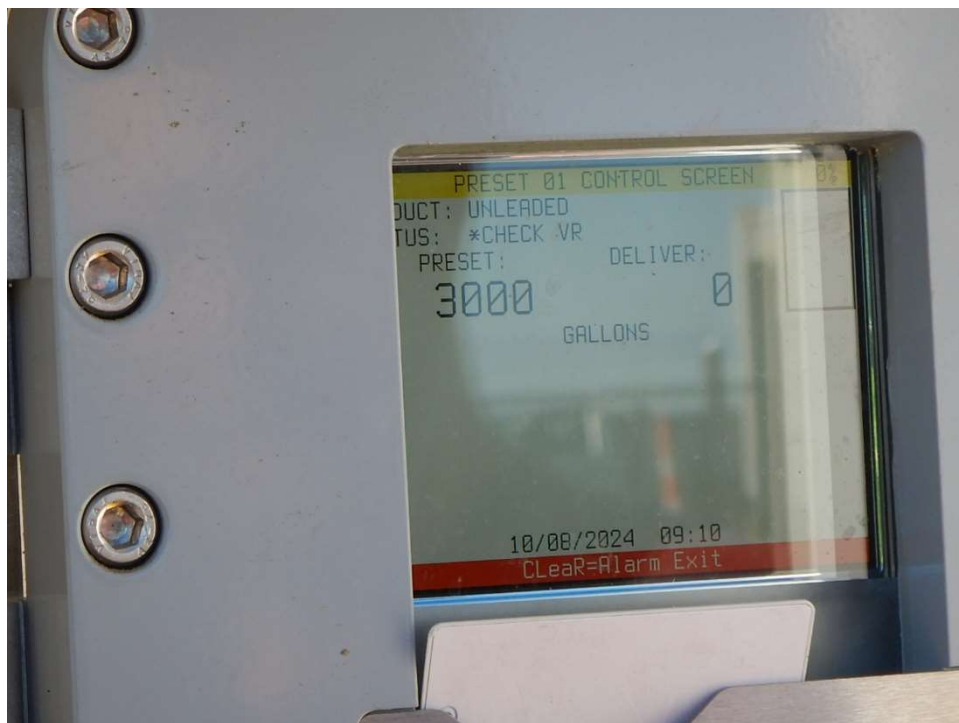
Number	Image Identification	Description	Time (A.M.)
7	DSCN1748.JPG	Vapor recovery unit indicator light	9:41



Number	Image Identification	Description	Time (A.M.)
8	DSCN1749.JPG	Toptech EXL fuel loading control system screen	9:48



Number	Image Identification	Description	Time (A.M.)
9	DSCN1750.JPG	Toptech EXI fuel loading control system screen	9:48



Number	Image Identification	Description	Time (A.M.)
10	DSCN1751.JPG	Thermal expansion tank for diesel and fuel oils	9:50



Number	Image Identification	Description	Time (A.M.)
11	DSCN1752.JPG	Thermal expansion tank for gasoline	9:50



Number	Image Identification	Description	Time (A.M.)
12	DSCN1753.JPG	Vapor return line on truck	9:52



Number	Image Identification	Description	Time (A.M.)
13	DSCN1754.JPG	Control panel of Scully lockout system	9:52



Number	Image Identification	Description	Time (A.M.)
14	DSCN1755.JPG	Truck computer and electronic hookup	9:53



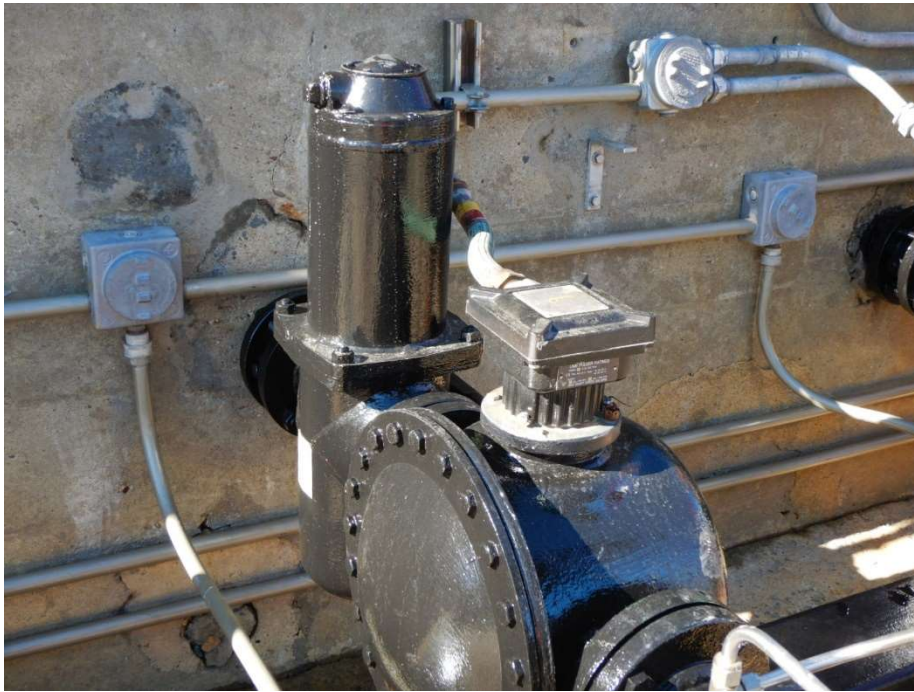
Number	Image Identification	Description	Time (A.M.)
15	DSCN1756.JPG	Gasoline line connected to truck	9:57



Number	Image Identification	Description	Time (A.M.)
16	DSCN1757.JPG	Gasoline loading rack (white)	9:57



Number	Image Identification	Description	Time (A.M.)
17	DSCN1758.JPG	Valve on thermal expansion line	10:00



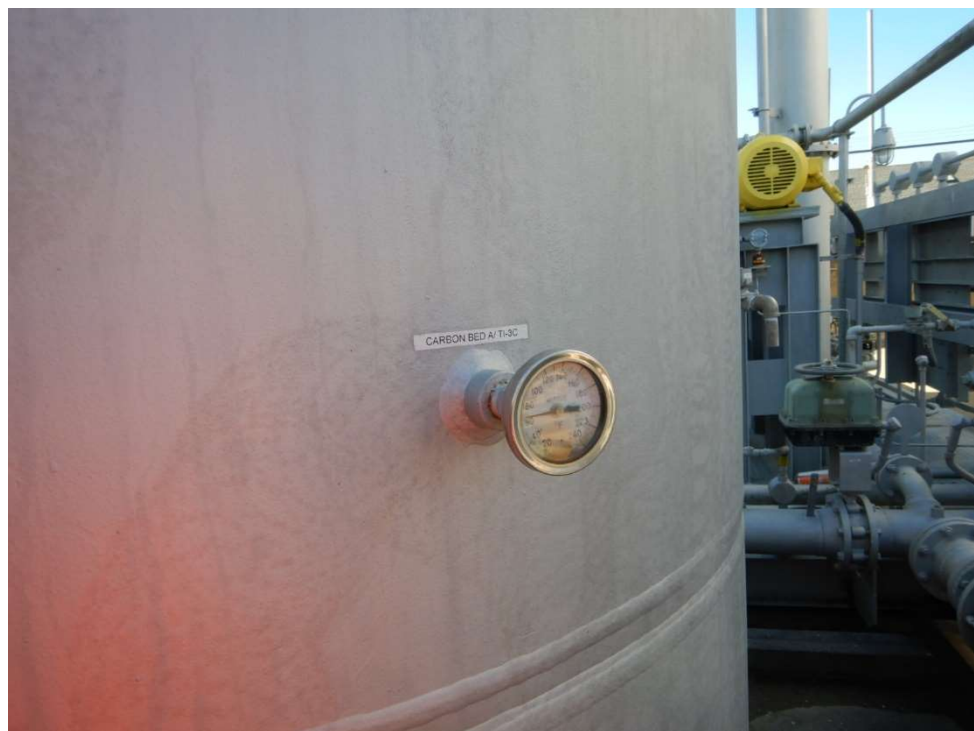
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Number	Image Identification	Description	Time (A.M.)
20	DSCN1761.JPG	Carbon bed A	10:10



Number	Image Identification	Description	Time (A.M.)
21	DSCN1762.JPG	Carbon bed B	10:10



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22	DSCN1763.JPG	Absorption tower (center)	10:10



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