Region 2 Caribbean Environmental Protection Division
Multimedia Permits and Compliance Branch – Air Protection Team

CAA Inspection Report

Inspection Date(s):	July 5-6, 2023
Facility Name:	Ocean Point Terminals, LLC (former Limetree Bay Terminals, LLC)
Facility Address:	One Estate Hope, Christiansted, VI 00820
Coordinates:	Latitude: 17.714764°; Longitude: -64.757309°
ICIS-Air ID #:	VI0000007800100002
Facility size:	Major
State Referral:	☐ Yes ☒ No
NAICS code:	424710 – Petroleum Bulk Stations and Terminals
Facility Contact(s):	Maria Aloyo, Health & Safety, & Environmental Supervisor, (340) 692-3781, Maloyo@opterminals.com Joyce Wakefield, Environmental Specialist, (340) 692-3205, jwakefield@opterminals.com
EPA Inspector:	Alex O. Rivera, Environmental Engineer, (787) 977-5845, rivera.alex@epa.gov

This was a Clean Air Act ("CAA") compliance inspection of Ocean Point Terminals, LLC ("OPT" or "Facility"), by the United States Environmental Protection Agency ("EPA"). The purpose was to evaluate the facility compliance with the below listed regulatory programs.

Permitted Regulatory Program(s) Evaluated:

1. 40 CFR, Part 63, Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations).
2. 40 CFR, Part 63, Subpart CC – National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries.
3. 40 CFR, Part 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.
4. The Virgin Islands Rules and Regulations, Title 12 Chapter 9

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 on compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

Inspection Summary

A. Opening Meeting

EPA Region 2 inspector Alex Rivera ("Inspector") arrived at the Facility at around 9:30 AM. After gaining access to the Facility, the Inspector was received by Ms. Maria Aloyo, Ms. Joyce Wakefield and Rhonda Liburd ("OPT representatives"). The inspector showed his inspector credential and stated that the purpose of the visit was to conduct a Clean Air Act inspection. The Inspector was escorted by OPT representatives to a conference room. The Inspector provided further details about the purpose of the visit and explained that an infrared (IR) camera and a MultiRae photoionization detector ("PID") will be used to survey the facility's truck loading rack area, the marine terminal and the gasoline storage tanks.

The Inspector informed that the inspection will be conducted in two (2) days and that the activities on July 5, 2023 will depend of the activities occuring at the marine terminal at that time. Ms. Aloyo consulted with the Facility operations personnel to determine the expected activities at the marine terminal during July 5-6, 2023. According to Ms. Aloyo the Facility expected a gasoline vessel loading product to the terminal on July 6, 2023. The Inspector then agreed on focusing the activities of July 5, 2023 on the gasoline storage tanks and truck loading rack area. The Inspector proceeded to obtain an update from OPT's representatives about the Facility operations since EPA's May 19, 2022 inspection. The following is a summary of the discussion:

- General Operations – Inspector Rivera asked OPT representatives about the Facility operations after Port Hamilton Refining and Transportation acquisition of the refinery part of the complex. OPT representatives stated that OPT's operations has not been affected, but acknowledged how challenging has been sharing the complex's critical infrastructure such as the wastewater treatment plant. Ms. Aloyo confirmed that OPT remains operating as a storage terminal without any significant changes since EPA's May 19, 2022 inspection. According to Ms. Aloyo, OPT continues to manage #6 fuel oil, #2 fuel oil, crude oil, liquified propane gas, butane, naphta, gasoline, and jet fuel.
- Gasoline storage tanks – Inspector Rivera requested OPT representatives to provide a list of the tanks storing gasoline at the time of the inspection and the type of floating roof. Ms. Aloyo provided a list of tanks in gasoline service and assisted the Inspector to identify the location of these in a Facility map. A total of 12 gasoline storage tanks were informed to be in service: Tanks 6888, 6841, 6840, 6839, 6843, 6835, 6834, 6833, 6831, 7425, 7447, and 7448.
- Power generation – Inspector Rivera asked OPT representatives for the status of the temporary power generation project, and the proposed project for permanent power generation in the complex. Ms. Aloyo confirmed that the 10 temporary power generators (1 megawatts each) remain in operation and informed that the construction activities for the permanent power generation project already started. Ms. Aloyo further indicated that the current construction activities consist of soil foundation preparation. OPT representatives acknowledged that the 12-month term for the temporary power generation project status is close to expire and that OPT is interested on agreeing with EPA on a compliance plan to cover for the months that will take to complete the permanent generation project. According to OPT representatives, the Facility expectation is to complete the project as soon as possible, but are also conscious of the potential schedule disruptions that can happen during hurricane season.
- Ms. Aloyo informed that a complex-wide leak detection and repair audit was conducted the week of June 26-30, 2023.

The Inspector and OPT representatives agreed to start with the site tour to observe the truck loading rack operations and gasoline storage tanks with the IR camera and the PID.

B. July 5, 2023 Site Tour

The Inspector was escorted by OPT representatives to the tank farm at around 11:20 AM. The following is a summary of the observations from the gasoline storage tanks in service at the time of the inspection:

Tank 6839

- Equipped with an EFR.
- Tank level approximately ¾ quarter full.
- Emissions were observed leaking from the automatic bleeder vent located at the southeast portion of the tank.
- Videos MOV_0011 and MOV_0012 were taken at 11:46 AM.
- PID VOC readings fluctuated from 5,000 to 7,000 ppb.

Tank 6840

- Equipped with an EFR.
- Tank level approximately ¾ quarter full.
- PID VOC readings fluctuated from 3,000 to 4,000 ppb.
- Emissions were observed leaking from the automatic bleeder vents located in the north and south portions of the tank.
- Videos MOV_0011 and MOV_0012 were taken at 12:05 PM and 12:06 PM respectively.

Tank 6841

- Equipped with an IFR.
- Tank level almost full.
- Emissions were observed leaking from eyebrow vents located east and northeast portion of the tank.
- Video MOV_0015 was taken at 12:19 PM.

Tank 6843

- Equipped with an IFR.
- Tank level at approximately ¾ quarter full.
- No emission leaks observed.

The Inspector and OPT representatives agreed on pausing the walkthrough to take a break for lunch at 12:30 PM. The inspection was resumed at 1:15 PM, the Inspector and OPT representatives met at a conference room and continued the general discussion about the Facility operations. The following is a summary of the discussions:

- Truck Loading Rack Vapor Recovery Unit (VRU) – Ms. Aloyo confirmed that OPT conducted the required VRU relative accuracy test audit (RATA) in June 2023 and informed that preventive maintenance is coordinated and scheduled to be conducted by a third-party contractor during the week of July 10-14, 2023.
- Title V Permit Status – Ms. Aloyo informed that OPT will be working with DPNR on drafting an application to modify the Facility Title V Permit. Ms. Aloyo confirmed that DPNR issued a notification to both OPT and PHRT to modify its joint Title V Permit. OPT representatives indicated that the main

challenge for splitting OPT and PHRT Title V Permit is the complex power generation and wastewater infrastructure.

- Power Generation – Ms. Aloyo informed that OPT plans to keep two of the complex power generation gas turbines (GT's 7 and 8) as back up to the permanent power generation project. OPT representatives informed that PHRT is currently using OPT's temporary power generation engines for supplying their power demand. The Inspector asked OPT representatives what power generation options PHRT will have if the complex split their power generation infrastructure. OPT representatives stated that gas turbines 9, 10 and 13 will remain as potential alternatives for PHRT.
- OPT representatives informed that the Facility currently has around 150 employees.

The Inspector and OPT representatives agreed on continuing the facility gasoline storage tanks walkthrough at 2:30 PM. The following is a summary of the observations of the continuation of the gasoline storage tanks walkthrough:

Tank 6833

- Equipped with an EFR.
- No emissions observed.
- Tank level was not determined.

Tank 6834

- Equipped with an EFR.
- Tank level at approximately half full.
- Equipment hatch cover leaking through what appears to be a corrosion pinhole.
- Several roof legs were observed with leaks. One (1) located in the north portion of the tank and adjacent to the tank gauge pole and two (2) located northeast and northwest of the tank draining pipe.
- Videos MOV_0017, MOV_0018, and MOV_0020 were taken at 2:55 PM, 2:58 PM, and 3:01 PM respectively[1].

Tank 6835

- Equipped with an EFR.
- Tank level approximately half full.
- Several roof support legs leaking in the southwest and south portion of the tank.
- Leakage from portion of EFR seal at northeast portion of the tank.
- Videos MOV_0021 and MOV_0022 were taken at 3:18 PM and 3:19 PM respectively.

Tank 7447

- Equipped with an EFR.
- Tank level approximately less than ¼ full.
- IR camera ran out of battery.

The walkthrough was concluded at 4:00 PM.

[1] Videos MOV_0016 and MOV_0019 were failed or botched attempts from the Inspector and were removed from the inspection list of videos nor were shared with OPT.

C. July 5, 2023 Closing Meeting

The Inspector and OPT representatives met at the Facility conference room and proceeded to conduct a closing meeting. Mr. Jeff Charles, Facility Manager; Bernard Joseph, Maintenance Engineer; and Eric Ehrins, Tank Inspector, joined the meeting. The Inspector shared and discussed the IR videos taken during the tank farm walkthrough with OPT representatives. The inspection was paused at 5:00 PM and agreed to continue with the inspection on July 6, 2023, at 8:00 AM.

D. July 6, 2023 Opening Meeting

The Inspector arrived at the Facility around 8:00 AM and met with OPT's Joyce Wakefield, Maria Aloyo and Rhonda Liburd. Ms. Aloyo informed that OPT personnel was addressing an issue with the marine loading terminal vapor combustion unit ("VCU") pilot failure, and it's expected to be repaired this morning. The VCU issue is delaying the schedule gasoline loading operation. The Inspector and OPT representatives agreed on continuing the facility gasoline storage tanks and truck loading operations walkthrough until the VCU issue is resolved and the marine loading operations can continue as scheduled. The walkthrough continued at the area where Tank 7447 is located and where the July 5, 2023 walkthrough ended due to the IR camera ran out of battery. Mr. Eric Ehrins, Tank Inspector, joined the walkthrough. The following is a summary of the observations and discussions during the walkthrough:

Tank 7448

- Equipped with an IFR.
- Tank level at approximately more than ¾ of its capacity.
- Small leak from eye-brow vent located towards the south/southeast portion of the tank.
- Small leak from eye-brow vent located in the northeast portion of the tank.
- Video MOV_0023 was taken at 8:46 AM

Tank 7447

- Equipped with an EFR.
- Tank level about to land on its roof supporting legs, approximately 8 feet of product.
- No emissions observed.

Truck Loading Rack

- OPT's contractor Zeeco will be onsite the week of July 10-14, 2023, to conduct preventive maintenance to the VRU. The maintenance task includes replacing the VRU CEMS outdoor display screen which was found damaged by sun exposure and cannot be read[2]. Zeeco is also the contractor that provide testing services to OPT's VRU.
- A tank truck from St. Croix Fuel Services Inc. with license plate YZA-915 was loading gasoline at approximately 9:35 AM.
- Significant emissions observed leaking from the top of the tank truck. The tank truck was venting emissions through the tank access hatches even when disconnected from the truck loading rack and while driving out of the truck loading operation area. Image DC_0024 was taken at 9:41 AM and videos MOV_0025, MOV_0026, MOV_0027, and MOV_0028 were taken at 9:42 AM, 9:43 AM, 9:45 AM, and 9:51 AM respectively.
- The Inspector requested OPT representatives to provide copies of the tank truck vapor tightness certification.

[2] On August 30, 2023, OPT's Maria Aloyo sent an email to EPA confirming that the CEMS outdoor display screen was replaced and shared a photo of the new equipment.

- No emissions observed from VRU.
- OPT had four (4) propane bullet tanks and has propane loading and distribution activities for the island.
- Truck loading operations area Tanks 6865, 6863, 6862 and 6861, all were observed with the IR camera and no emissions were observed.

Tank 6888

- Equipped with an IFR.
- Connected to the truck loading rack.
- No emissions observed.

Tank 6835 (Revisited)

- Tank 6835 (EFR) was revisited to allow Mr. Erick Ehrins to observe the tank with the IR camera.
- Tank level was approximately ½ half full.
- Emissions were observed through the northeast portion of the tank EFR seal.
- No emissions were observed through the roof supporting legs. Mr. Ehrins attributed this to lower temperature and lower wind velocity.

OPT representatives were informed that the VCU issue was resolved and that OPT operators were ready to begin loading gasoline from a vessel. The Inspector and OPT representatives drove to the marine loading terminal. The following is a summary of the observations and discussions during the marine loading terminal walkthrough:

Marine Loading Terminal

- One of OPT's marine terminal docks is exclusively used to park a liquified natural gas vessel that services Puerto Rico.
- OPT representatives informed and showed a smaller gasoline vessel loading at dock #2. According to OPT representatives, the smaller gasoline vessels that use dock #2 are used to supply gasoline to other Caribbean islands and indicated that the emissions from these smaller vessels are not required to be controlled.
- Ms. Aloyo confirmed that a larger gasoline vessel was loading gasoline at dock #5. Also informed that a crude oil vessel was using dock #3 and that dock #4 was out of operation for maintenance.
- The Inspector asked about the Facility single point mooring (SPM) status. Ms. Aloyo informed that OPT personnel conducts weekly preventive maintenance checks, a yearly hydrostatic test is conducted every year, it is used only for crude oil, it is rarely used, and that the last time it was used was in March 2023.
- The Inspector observed the gasoline vessel at dock #5 with the IR camera while connected to the VCU and no leaks were observed. Emissions were observed from the vessel pressure relief valves before the vessel was connected to the VCU and while OPT was adjusting its vapor collection system pressure. Once the vapor collection system was properly adjusted and the vapors conveyed to the VCU, no emissions were observed.
- The Inspector observed the gasoline vessel at dock #2. Emissions were observed from the vessel pressure relief valves. Slight gasoline odor was noticed. The Inspector asked OPT representatives about the vapor collection system infrastructure available at dock #2. OPT representatives explained that these types of vessels are not required to be connected to the vapor collection system because of its size. Videos MOV_0029 and MOV_0030 were taken at 11:23 AM and 11:25 AM respectively.
- The Inspector asked OPT representatives about the gasoline odor noticed near dock #2 and that if the complaints they have been receiving about odors from the neighboring Container Port are described as similar to gasoline. Ms. Wakefield explained that marine terminal docks are far from the Container Port and that the odor reported and that OPT representatives have been able to notice is similar to the odor

from crude oil. Ms. Wakefield and Ms. Aloyo confirmed that OPT identified several tanks that are used to store crude oil (Fuel Oil No. 6) adjacent to the Container Port. Ms. Aloyo informed that these tanks are not used continuously and that OPT has noticed odors depending on the source of the crude oil and explained that recently they received a specific Fuel No. 6 shipment that was abnormally odorous.

- The Inspector and OPT representatives continued the walkthrough to the VCU area. No visible emissions were observed. The following is a summary of the conversation with Mr. Bevern Sage, VCU operator:
    - Explained that the VCU had issues with one (1) of the unit three (3) flame detectors. Such flame detector was replaced during the morning.
    - Propane is used as supplemental gas.
    - Has three (3) thermocouples.
    - Temperature was 1,615^{o}F.
    - Unit has fresh air blower fan and a lower explosive level (LEL) meter for each of the three (3) stages.
    - The unit flow meter is calibrated bi-annually.
    - LEL meters are inspected weekly.
    - Unit has one flame arrestor. Each dock has flame arrestors too. Unit has a knockout pot prior to the flame arrestor, which is cleaned once per year.

Container Port

OPT representatives escorted the Inspector to the tank farm adjacent to the Container Port. The following is a summary of the observations and discussions with OPT representatives in this area:

- Tanks 7501 and 7502 are located adjacent to the Container Port and near to the security guard gate.
- Tanks 7501 and 7502 are used for Fuel No. 6 storage for a Puerto Rico client.
- OPT has two (2) air monitoring equipment located in the area. Also, OPT's benzene fenceline monitoring station #10 is located in this area. According to OPT representative the air monitoring stations are not providing any abnormal or concerning readings. OPT representatives acknowledged that occasionally they have noticed a foul odor in the area, which is more common to crude oil and not gasoline.
- OPT representatives confirmed that the company is aware of the issue and are discussing potential mitigation actions.

The Inspector and OPT representatives agreed on taking a lunch break at 12:30 PM and meet at OPT conference room at approximately 1:30 PM for the inspection closing meeting.

E. Closing Meeting

The Inspector and OPT representatives met at the Facility conference room and proceeded to conduct a closing meeting. Mr. Jeff Charles, Ms. Aloyo, Ms. Wakefield and Ms. Liburd were among the OPT representatives that participating in this meeting. The Inspector shared and discussed the IR videos taken during the tank farm, truck loading rack, and marine terminal with OPT representatives. Ms. Aloyo provided the Inspector a copy of the vapor tightness inspection related to the tank truck that was observed with significant emissions during the walkthrough. According to the vapor tightness inspection provided, the tank truck was inspected and certified on February 23, 2023. Ms. Aloyo also showed an Excel spreadsheet that OPT uses to track the status of each tank seal gap inspections. Ms. Aloyo further explained that she meets with OPT's two (2) tanks inspectors every two (2) weeks to generate and keep track of the inspections schedule and showed a copy of such inspection schedule/calendar, which contains a color code for the type of inspection and assigned priority. The Inspector

summarized the list of documents to be requested via email and agreed with Ms. Aloyo for OPT to provide the following information[3]:

Marine Loading Terminal

1. An electronic spreadsheet containing at least the last six (6) months (from the date of this Request) of continuous parameter monitoring system temperature data, with both the hourly averages and the 3-hour rolling averages.
2. An electronic spreadsheet containing the monthly product throughput for the marine vapor collection system ("MVCS") and thermal oxidizer H-1612, from January 1, 2022 through July 14, 2023.
3. An electronic spreadsheet containing the monthly and daily propane fuel consumption, from January 1, 2022 through July 14, 2023.
4. A complete and detailed description of any malfunction events that affected the MVCS and thermal oxidizer H-1612, and any corrective actions that were taken from January 1, 2022 through July 14, 2023.
5. Copies of the vapor tightness documentation pertaining to the gasoline vessel loading at dock #5 on July 6, 2023.
6. MVCS usage log from January 1, 2022 through July 14, 2023.
7. Copies of thermal oxidizer thermocouples TE-502 and TE-506 calibration records from January 1, 2022 through July 14, 2023.
8. Single Point Mooring (SPM) – Provide an electronic spreadsheet of the monthly product throughput for the SPM from January 1, 2021, through July 14, 2023.

Tanks:

1. Provide a list of each storage tank at the Facility that has been in gasoline service, or storing a gasoline blend stock, from January 1, 2023 through July 14, 2023. This list should include the tank identification number, the designed capacity, the date that the tank was put in service, and the type of tank (e.g., internal floating roof, external floating roof, geodesic dome, etc.).
2. Provide the annual throughput for each tank listed in item 1 above from January 1, 2022 through July 14, 2023.
3. Provide all VOC and HAP emission calculations for all tanks with floating roofs for calendar year 2022. Include any roof landing emissions (Excel Spreadsheet).
4. For all tanks listed under gasoline service and on resting status during July 5-6, 2023, provide the date when was placed on resting (roof landing) and the expected or date of placing them back in service.
5. For Tanks 7501 and 7502[4]
    a. Provide the monthly product throughout from January 1, 2022 through July 14, 2023.
    b. Provide the fuel quality analysis certificates related to any product loaded to Tanks 7501 and 7502 from January 1, 2022 through July 14, 2023.
    c. Description of the efforts being taken by OPT to address the odors complaints that have been presented by VI Port Authority's Container Port personnel and any future plans to avoid this type of issues in the past.

[3] OPT's Maria Aloyo agreed with EPA on providing this information by August 31, 2023. The information was provided to EPA via email on August 30, 2023.

[4] OPT's Maria Aloyo provided the requested information about Tanks 7501 and 7502 via email on July 27, 2023.

Truck Loading Rack:

1. Provide an electronic spreadsheet of continuous emissions monitoring system (CEMS) data used to demonstrate compliance with the applicable VOC limit, from June 1, 2022, through July 14, 2023.
2. Provide an electronic spreadsheet of the monthly product (i.e., gasoline, diesel) throughput for the truck loading rack from June 1, 2022, through July 14, 2023.
3. Provide the monthly gasoline throughput for the truck loading rack from June 1, 2022 through July 14, 2023.

EPA inspectors thanked OPT representatives for their cooperation and availability during the inspection and concluded the inspection at 3:00 PM.

Inspection Report Sign-Off

Lead Inspector's Name: Alex Rivera

Rivera, Alex Digitally signed by Rivera, Alex
Date: 2023.08.31 17:47:24 -04'00'

Supervisor's Name: Nancy Rodríguez

NANCY RODRIGUEZ Digitally signed by NANCY RODRIGUEZ
Date: 2023.08.31 17:49:41 -04'00'