



Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	02/14/2024	
Media Program:	Air	
Regulatory Program(s)	SIP, Title V, NSPS, NESHAP	
Company Name:	TPC Group LLC	
Facility Name:	Port Neches Operations	
Facility Physical Location:	2102 TX-136 Spur	
(city, state, zip code)	Port Neches, TX 77651	
Mailing address:	2102 TX-136 Spur	
(city, state, zip code)	Port Neches, TX 77651	
County/Parish:	Jefferson County	
Facility Phone Number	409-724-4700	
Facility Contact:	Brad Wilkins	Senior Environmental Engineer
	brad.wilkins@tpcgrp.com	
FRS Number:	110000504801	
Identification/Permit Number:	RN104964267 / FOP O1327	
Media Identifier Number:	AFS # 48-245-00715	
NAICS:	424710	
SIC:	5171	
Personnel participating in inspection:		
James Haynes	EPA Region 6 ECDAT	Physical Scientist
Ben Rosenthal	EPA Region 6 ECDAT	Physical Scientist
Nicholas Bobbs	EPA OECA/OCE/AED	Environmental Engineer
Dan Heins	EPA OECA/OCE/AED	Environmental Scientist
Philip Myers	EPA OECA/OCEFT/NEIC	Mechanical Engineer
Conor Goulding	EPA OECA/OCEFT/NEIC	Physical Scientist
Brad Wilkins	TPC Group LLC	Senior Environmental Engineer
Scott Hanks	TPC Group LLC	Safety Facilitator
EPA Lead Inspector Signature/Date		
	James Haynes	Date
Supervisor Signature/Date		
	James Leathers	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA inspectors Nicholas Bobbs and Dan Heins, accompanied by Philip Myers and Conor Goulding with EPA's National Enforcement Investigations Center ("NEIC") staff arrived at TPC Group LLC's Port Neches Operations (the "Facility") at 12:45 on February 13, 2024 for an unannounced inspection. Upon arrival, the EPA inspectors and NEIC, met with Mr. Scott Hanks, Safety Facilitator. The EPA inspectors presented their credentials to Mr. Hanks and informed them that this was an EPA inspection to evaluate potential sources of excess emissions using EPA's Geospatial Measurement of Air Pollution ("GMAP") vehicle and evaluate compliance with the Clean Air Act and the Facility's Title V Air Permit. The scope of the inspection is a partial compliance evaluation. This inspection occurred as part of a multi-scale monitoring project in the Beaumont-Port Arthur area.

FACILITY DESCRIPTION

The Facility operates as a terminal that transfers various liquid material, including but not limited to methanol, butadiene, and raffinate, from rail, pipeline, and barges into storage tanks and out to various clients.

Section II - OBSERVATIONS

GMAP Inspection

Mr. Goulding drove the GMAP and Mr. Myers operated the GMAP's instruments. The EPA inspectors followed the GMAP in a secondary vehicle. The GMAP drove on all available facility roads to measure air pollutant concentrations downwind of each process area. A full report from the GMAP will be issued by NEIC at a later date.

EPA inspectors noted a plume of hydrocarbon emissions using an optical gas imaging ("OGI") camera from a perimeter vent on Tank 55, an internal floating roof ("IFR") storage vessel containing methanol.

The site GMAP survey ended at 13:50.

Region 6 Follow-up Inspection

I, James Haynes, with Ben Rosenthal, EPA Region 6 inspectors, arrived at the Facility at 09:30 on February 14, 2024 for an unannounced follow-up inspection. I presented my credentials to Mr. Hanks and Mr. Brad Wilkins, Senior Environmental Engineer.

We began the follow-up inspection by returning to Tank 55, an IFR storage vessel containing methanol. Mr. Rosenthal observed hydrocarbon emissions with the OGI camera from the western perimeter vents.

A leak detection and repair (“LDAR”) technician with HPC Industrial separately confirmed emissions from Tank 55’s perimeter vents. Mr. Wilkins informed us that the most recent inspection of the IFR was completed in the previous month. **[AOC 1]**

After obtaining the necessary permits, we observed several tanks and process equipment in Block 7. No hydrocarbon emissions were observed from any of the tanks in this Block. Following the activity in Block 7, we visited the control room and spoke with a Facility operator who described the control equipment and monitoring data collected for the #1 and #2 vapor combustion units (“VCU1” and “VCU2”). The VCU2 is the primary unit that controls emissions from the tanks, some of which are vented automatically while others are vented manually. The Facility operator showed us the temperature alarms set on the VCU1/VCU2. I noted that the Facility did not set a low temperature alarm for VCU2, and that there may not be any feedback to the control room operators when temperatures drop below a limit established during a performance test to ensure compliance. **[AOC 2]** We exited the control room and viewed the area of the Facility where VCU1/VCU2 are located. See Photo No. 1.

We visited Dock No. 3 to observe the loading equipment and the associated dock flare. While we were in this area of the Facility, we discussed any wastewater from the loading process and other general wastewater flows for the site.

The inspection team departed the facility at 15:25.

Section III – AREAS OF CONCERN

I conducted a closing conference at 14:50 for the inspection with Mr. Hanks and Mr. Wilkins. We summarized the observations, including the following Areas of Concern:

- 1) At Tank 55, EPA inspectors observed hydrocarbon emissions with the OGI camera, indicating that the floating roof and seals of the IFR may not be controlling emissions as required.
- 2) At VCU2, the control board did not display low temperature alarms that are consistent with performance test data to ensure adequate combustion temperatures are maintained for the proper destruction of waste gas.

Section IV – FOLLOW UP

EPA requested additional information following the inspection. On March 8, 2024, I received a partial response to my request. The remaining responses were submitted April 5, 2024.

Section V – LIST OF APPENDICES

Appendix 1 – Photograph Log

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 1

Location: TPC Group LLC / Port Neches Operations		
City: Port Neches	County: Jefferson	State: TX



Photo File Name:	FLIR0058.jpg
Date of Photo:	02/14/2024
Time of Photo:	14:13
Photographer:	James Haynes
Description:	VCU1 and VCU2