



**Region 6 - Enforcement & Compliance Assurance Division**  
**INSPECTION REPORT**

Inspection Date(s):	04/21/2022	
Media Program:	Air	
Regulatory Program(s)	Title V	
Company Name:	Plains Marketing LP	
Facility Name:	Plains Marketing LP – St. James Terminal	
Facility Physical Location:	6375 Hwy 18	
(city, state, zip code)	St. James, LA 70086	
Mailing address:	333 Clay St., Ste 1600	
(city, state, zip code)	Houston, TX 77002	
County/Parish:	St. James	
Facility Phone Number	713-646-4100	
Facility Contact:	Shannon Duncan <a href="mailto:Sduncan@paalp.com">Sduncan@paalp.com</a>	HSE Specialist
FRS Number:	110022481777	
Identification/Permit Number:	2560-00271-V13AA	
Media Identifier Number:	AFS 22-093-00271	
NAICS:	424710	
SIC:	4226	
Personnel participating in inspection:		
Sarah Frey	EPA ECD-AT	Inspector
Chris Williams	EPA OECA-AED	Chemical Engineer
Richard Helmich	EPA NEIC	Chemist
David Mahoney	EPA NEIC	Technical Coordinator
Ali Gitipour	EPA ORD	Engineer
Sophia Ong	LDEQ	Environmental Scientist
Shannon Duncan (by phone)	Plains Marketing	HSE Specialist
Jon Hotard	Plains Marketing	Operations Supervisor
EPA Lead Inspector Signature/Date	<i>Sarah Frey</i> Sarah Frey	6/23/2022 Date
Supervisor Signature/Date	<b>JAMES LEATHERS</b> James Leathers	Digitally signed by JAMES LEATHERS Date: 2022.07.15 16:34:33 -05'00' Date

## **Section I – INTRODUCTION**

### **PURPOSE OF THE INSPECTION**

EPA inspectors Sarah Frey (Region 6) and Chris Williams (Headquarters), accompanied by Richard Helmich (National Enforcement Investigations Center, “NEIC”), David Mahoney (NEIC), and Ali Gitipour (Office of Research and Development), arrived at the Plains Marketing LP - St. James Terminal at 12:30 pm on April 21, 2022 for an unannounced inspection. We were accompanied by Louisiana Department of Environmental Quality inspector Sophia Ong. We met with Joanna Falgoust, Administrative Assistant and Analyst, Jon Hotard, Operations Supervisor, and Shannon Duncan (by phone), HSE Specialist. Credentials were presented to Jon Hotard and we informed him 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 facility’s Title V Permit and the Clean Air Act. The scope of the inspection is a partial compliance evaluation (“PCE”). This inspection occurred as part of the Administrator’s Multi-Scale Monitoring Project called the Pollution Accountability Team (“PAT”).

### **FACILITY DESCRIPTION**

Plains Marketing LP - St. James Terminal is a bulk storage terminal that operates under Permit Number 2560-00271-V13AA issued May 21, 2020. The facility has multiple internal floating roof tanks and external floating roof tanks. Liquids are received and shipped via pipelines, rail, and marine vessels.

## **Section II - OBSERVATIONS**

The NEIC GMAP was driven by Mr. Mahoney and the instruments were operated by Mr. Helmich and Mr. Gitipour. A facility representative, Mr. Hotard, was present in the GMAP. Inspectors Dr. Frey, Mr. Williams, and Ms. Ong followed in a separate car. Mr. Hotard guided the GMAP throughout the tank terminal, where air pollution data was collected and recorded. A full report from the GMAP will be issued by NEIC at a later date.

Near tank 5280, concentrations of Volatile Organic Carbon (“VOC”) emissions were detected, near 400 parts per billion (“ppb”). Mr. Williams attempted to locate the source of the emissions using an OGI camera, but was unsuccessful. Downwind of tank 5210, intermittent VOC was detected at concentrations ranging from 1400 to 2400 ppb. The tank was not in service, but being cleaned. Both tanks were equipped with external floating roofs.

No other emissions were detected during the site tour.

**Section III – AREAS OF CONCERN**

Richard Helmich, Sarah Frey, and Chris Williams conducted a closing conference at Plains Marketing LP-St. James Terminal at 2:30 pm on April 21, 2022 with Mr. Hotard. During the closing conference, Mr. Helmich reviewed the emissions detected by the GMAP during the inspection. We observed no areas of concern at the time of the inspection and departed the facility at 2:40 pm.

After departing the facility, the GMAP detected a large plume of VOCs along the public road. The team followed the plume to the barge loading operations for Plains Marketing LP – St. James Terminal at 2:50 pm. Initially, one vapor combustion unit was operating, but it had ceased operations by 3:00 pm. The inspection team observed open hatches on the barges docked at the facility's Marine Unit. Concentrations up to 35,000 ppb VOC, including benzene and toluene concentrations of 100 ppb each, was observed. More details will be provided in the subsequent GMAP report. We departed the area at 3:08 pm.

**Section IV – FOLLOW UP**

No additional information was received by EPA after exiting the Facility on April 21, 2022.

**Section V – LIST OF APPENDICES**

No Appendices.