MEMORANDUM

TO: FILE – PRICE RIVER TERMINAL, LLC – Oil Transloading Facility

THROUGH: Rik Ombach, Minor Source Oil and Gas Compliance Section Manager

(R)

DATE: July 15, 2024

SUBJECT: FULL COMPLIANCE EVALUATION, Minor, Carbon County

INSPECTION DATE: March 14, 2024

SOURCE LOCATION: 6000 East Wash Plant Road

Wellington, UT 84542

DIRECTIONS: From Wellington, UT take 100 East south for 1 mile, turn east

onto Ridge Road and continue for .5 mile. Facility will be on the

south side of the road.

SOURCE CONTACTS: Benoît R. Lamarche - Manager - Environmental Compliance:

713.948.7517 office - 936.402.0362 mobile benoit.lamarche@energytransfer.com

OPERATING STATUS: Operating normally at the time of inspection.

PROCESS DESCRIPTION: The facility transfers crude oil from tanker trucks to an oil

storage tank and then to railcars which are shipped to various crude oil refineries throughout the United States. Railcars are filled and stored on site; the railcars are then connected to a locomotive engine and transported via rail to a crude oil refinery.

APPLICABLE REGULATIONS: Approval Order (AO) DAQE-AN148620003-20, dated Octiber

21, 2020

40 CFR Part 60 Subpart Kb

SOURCE EVALUATION:

Name of Permittee: Permitted Location:

Price River Terminal, LLC - Oil Transloading

Facility

3215 West 4th Street 6000 East Wash Plant Road Fort Worth, TX 76107 Wellington, UT 84542

SIC Code: 4226: (Special Warehousing & Storage, NEC)

Section I: GENERAL PROVISIONS

- I.1 All definitions, terms, abbreviations, and references used in this AO conform to those used in the UAC R307 and 40 CFR. Unless noted otherwise, references cited in these AO conditions refer to those rules. [R307-101]
- I.2 The limits set forth in this AO shall not be exceeded without prior approval. [R307-401]
- I.3 Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved. [R307-401-1]
- I.4 All records referenced in this AO or in other applicable rules, which are required to be kept by the owner/operator, shall be made available to the Director or Director's representative upon request, and the records shall include the two-year period prior to the date of the request. Unless otherwise specified in this AO or in other applicable state and federal rules, records shall be kept for a minimum of two (2) years. [R307-401-8]
- I.5 At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded. [R307-401-4]
- I.6 The owner/operator shall comply with UAC R307-107. General Requirements: Breakdowns. [R307-107]
- I.7 The owner/operator shall comply with UAC R307-150 Series. Emission Inventories. [R307-150]
- I.8 The owner/operator shall submit documentation of the status of construction or modification to the Director within 18 months from the date of this AO. This AO may become invalid if construction is not commenced within 18 months from the date of this AO or if construction is discontinued for 18 months or more. To ensure proper credit when notifying the Director, send the documentation to the Director, attn.: NSR Section. [R307-401-18]

Status: Out of Compliance with Condition I.5. Tank T2100 was not operated and maintained in a manner consistent with good air pollution control practice for minimizing emissions. Volatile organic liquids accumulating on the roof stemmed from an air eliminator, which permitted air to enter the tank and pass through the leg seals.

All records were made available upon request. The source is in compliance with UAC R307-107 and has made the DAQ aware of all breakdowns. See attached record of notification for breakdowns. The facility has submitted its 2023 emission inventory.

Section II: SPECIAL PROVISIONS

- II.A The approved installations shall consist of the following equipment:
- II.A.1 Crude Oil Transloading Facility
- II.A.2 **Two (2) Oil Storage Tanks**Maximum Capacities: one 88,300 bbl and one 120,000 bbl (NEW)
 Tank VOC Control Type: Floating Roofs

II.A.3 One (1) Flare

Maximum Capacity: 0.48 MMBTU/hr

Contains: Blower Control Efficiency: 98%

Controls: Transloading activities

II.A.4 Five (5) Adsorption Units

Maximum Flowrate: 150 acfm

Equipped with a breakthrough monitor

II.A.5 Two (2) Tank Heaters

Maximum Rated Capacity: less than 5 MMBtu/hr (each)

Fuel: Natural Gas

II.A.6 One (1) Diesel Storage Tank*

Maximum Tank Capacity: 1,000 gallons

*Tank is noted for informational purposes only.

II.A.7 Loading/Unloading Racks

Status: In Compliance. The above listed equipment was accurate and onsite, no unapproved

equipment was observed during the time of inspection.

II.B Requirements and Limitations

II.B.1 Site-Wide Requirements

II.B.1.a The owner/operator shall not exceed the following processing limitations:

A. 14,600,000 barrels (bbls) of crude oil processed through the oil storage tanks and transloaded to railcars per rolling 12-month period.

B. 10,400,000 bbls of crude oil transloaded to railcars through mobile operations per rolling 12-month period. [R307-401-8]

- II.B.1.a.1 To determine compliance with a rolling 12-month total, the owner/operator shall calculate a new 12-month total by the 20th day of each month using data from the previous 12 months. Records of tank versus mobile crude oil railcar loading shall be individually kept for all periods when the plant is in operation. Site-wide crude oil transloading shall be determined by examination of company and/or customer billing records. The records of crude oil transloading shall be kept on a daily basis. [R307-401-8]
- II.B.1.b The owner/operator shall route all emissions from all tank loading and unloading operations to an operational flare prior to exhausting the air to the atmosphere. [R307-401-8]
- II.B.1.c The owner/operator shall route all emissions from all mobile railcar loading and unloading operations to a carbon adsorption drum prior to exhausting the air to the atmosphere. [R307-401-8]
- II.B.1.d The owner/operators shall replace the carbon in the affected absorber drum upon activation of the breakthrough monitor. Each absorber drum shall have the carbon replaced at a minimum of once annually. Records of absorber drum carbon replacement shall be kept and maintained onsite. [R307-401-8]
- II.B.1.e Unless otherwise specified in this AO, the owner/operator shall not allow visible emissions from any stationary point or fugitive emission source on site to exceed 10% opacity. [R307-401-8]

II.B.1.e.1 Opacity observations of emissions from stationary sources shall be conducted while in operation in accordance with 40 CFR 60, Appendix A, Method 9. [R307-401-8]

Status: In Compliance. Records reviewed from the past 2 years show that the max throughput processed though the tanks to railcars as 11,555,072 BBLs (January 1, 2023 – December 31, 2023), there were no mobile loading operations directly from truck to railcars in the past 2 years. In 2022 there was a throughput of 134,635 BBLs from tank to trucks. These throughputs are in compliance with the facility's limits. See attached records from Price River Terminal showing throughput records. A flare is used to control emissions from tank to railcar loading and carbon absorber drums are used to control emissions when the flare cannot be used. Records reviewed onsite show that the carbon absorber drums were replaced on October 11, 2023, which is in compliance with Condition II.B.1.d. There were no visible emissions above 10% observed during the time of inspection.

II.B.2 Tank Requirements

II.B.2.a The owner/operator shall load the rail cars on site by the use of splash and submerged loading from the oil storage tank. The owner/operator shall load the truck tankers from the bottom. [R307-401-8]

Status: In Compliance.

- II.B.3 Flare Requirements
- II.B.3.a The owner/operator shall not allow any visible emissions from the flare. [R307-401-8]
- II.B.3.a.1 Visual determination of smoke emissions from flares shall be conducted according to 40 CFR 60, Appendix A, Method 22. [R307-401-8]

Status: In Compliance. All exhaust gas/vapors from rail cars during rail car loading were routed to the flare and the flare was operating with no visible emissions during the time of the inspection.

- II.B.4 Fugitive Dust Requirements
- II.B.4.a The owner/operator shall not allow visible emissions from haul roads, terminal access roads, and mobile equipment in operational areas to exceed 20% opacity. [R307-205]
- II.B.4.a.1 Visible emission determinations for fugitive dust from haul-road traffic and mobile equipment areas shall use procedures similar to Method 9. The normal requirement for observations to be made at 15-second intervals over a six-minute period, however, shall not apply. Visible emissions shall be measured at the densest point of the plume but at a point not less than 1/2 vehicle length behind the vehicle and not less than 1/2 the height of the vehicle. [R307-205]
- II.B.4.b To prevent visible emissions from exceeding the opacity limits listed in this AO, the owner/operator shall use water application on haul roads, terminal access roads, and all fugitive dust sources (including haul roads and terminal access roads) on site. The owner/operator may stop applying water to fugitive dust sources when the temperature is below freezing but shall apply other controls as necessary to prevent visible emissions from exceeding the opacity limits listed in the AO. [R307-401-8]

- II.B.4.b.1 Records of water application shall be kept for all periods when the plant is in operation. The records shall include the following items:
 - A. Date and time water application was made
 - B. Number of water applications made and quantity of water applied
 - C. Rainfall amount received, if any
 - D. Records of temperature, if the temperature was below freezing. [R307-401-8]

Status: In Compliance. No visible emissions were observed from the haul roads during the time of inspection. The speed limit is posted to be 15 mph for all haul roads onsite. Records reviewed onsite showed that the facility has sprayed water on haul roads to control visible emissions.

- II.B.5 Monitoring Requirements of Fugitive Emissions (Leak Detection and Repair)
- II.B.5.a The owner/operator shall develop a fugitive emissions monitoring plan for the storage tanks and flare operations. At a minimum, the plan shall include:
 - A. Monitoring frequency
 - B. Monitoring technique and equipment
 - C. Procedures and timeframes for identifying and repairing leaks
 - D. Recordkeeping practices
 - E. Calibration and maintenance procedures. [R307-401-8]
- II.B.5.b The owner/operator shall conduct monitoring surveys on site to observe each "fugitive emissions component" for "fugitive emissions."
 - A. "Fugitive emissions component" means any component that has the potential to emit fugitive emissions of VOC, including but not limited to valves, connectors, pressure relief devices, open-ended lines, flanges, covers and closed vent systems, thief hatches or other openings, instruments, and meters.
 - B. "Fugitive emissions" are considered any visible emissions observed using optical gas imaging or a Method 21 instrument reading of 500 ppm or greater. [R307-401-8]
- II.B.5.b.1 Monitoring surveys shall be conducted according to the following schedule:
 - A. No later than 90 days after startup or 180 days from the date of this AO.
 - B. Annually after the initial leak detection inspection. [R307-401-8]
- II.B.5.b.2 Monitoring surveys shall be conducted using one or both of the following to detect fugitive emissions:
 - A. Optical gas imaging (OGI) equipment. OGI equipment shall be capable of imaging gases in the spectral range for the compound of highest concentration in the potential fugitive emissions.
 - B. Monitoring equipment that meets U.S. EPA Method 21, 40 CFR Part 60, Appendix A. [R307-401-8]

II.B.5.c If fugitive emissions are detected at any time, the owner/operator shall repair the fugitive emissions component as soon as possible but no later than 15 calendar days after detection.

If the repair or replacement is technically infeasible, or would be unsafe to repair during operation of the unit, the repair or replacement must be completed during the next shutdown, or within 24 months, whichever is earlier. [R307-401-8]

- II.B.5.c.1 The owner/operator shall resurvey the repaired or replaced fugitive emissions component no later than 30 calendar days after the fugitive emissions component was repaired. [R307-401-8]
- II.B.5.d The owner/operator shall maintain records of the fugitive emissions monitoring plan, monitoring surveys, repairs, and resurveys. [R307-401-8]

Status: In Compliance. See attached monitoring plan. The facility conducts annual LDAR inspections. See attached 2022 and 2023 LDAR monitoring inspection reports. Price River Terminal confirmed that the leak found in December 2023, on the hose connector, was repaired the same day it was found.

Section III: APPLICABLE FEDERAL REQUIREMENTS

In addition to the requirements of this AO, all applicable provisions of the following federal programs have been found to apply to this installation. This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including UAC R307.

40 CFR Part 60 Subpart Kb:

Out of Compliance with section 60.113b(a)(2): Tank T2100's internal floating roof and the primary seal or the secondary seal (if one is in service) were not inspected through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill, during the time of inspection. This has been addressed with a CA (DAQC-282-24) and ESA (DAQC-663-24). Price River Terminal, LLC has updated its Operations and Maintenance Plan to include internal floating roof inspections at least once every 12 months.

AREA SOURCE RULES EVALUATION:

The following Area Source Rules were evaluated during this inspection:

R307-107. General Requirements: Breakdowns:

In Compliance. See attached breakdown notifications from Price River Terminal. The DAQ was notified within 24-hours of the breakdown; a written description of the circumstance of the incident and its corrective action were also submitted. All necessary repairs appeared to have been made as quickly and as practicably possible.

EMISSION INVENTORY:

Listed before are the Actual Emissions Inventory provided from Price River Terminal, LLC - Oil Transloading Facility. A comparison of the estimated total potential emissions (PTE) on AO: DAQE-AN148620003-20: *PTE are supplied for supplemental purposes only*.

Criteria Pollutant	PTE tons/yr	Actuals tons/yr
CO ₂ Equivalent	42574.26	
Carbon Monoxide	60.53	36.90
Nitrogen Oxides	22.42	13.43
Particulate Matter - PM ₁₀	11.86	4.59
Particulate Matter - PM _{2.5}	4.54	0.95
Sulfur Dioxide	0.32	0.32
Volatile Organic Compounds	32.84	28.52

Hazardous Air Pollutant	PTE lbs/yr	Actuals lbs/yr
Generic HAPs (CAS #GHAPS)	432	0.22

PREVIOUS ENFORCEMENT

ACTIONS: Compliance Advisory: DAQC-282-24; March 25, 2024

Early Settlement Agreement: DAQC-663-24; July 11, 2024

COMPLIANCE STATUS &

RECOMMENDATIONS: In regards to Approval Order (AO) DAQE-AN148620003-20:

Out of Compliance. Site was out of compliance with Condition I.5 and 40 CFR Part 60 Subpart Kb 60.113b(a)(2). A CA

(DAQC-282-24) and ESA (DAQC-663-24) have been sent out to

address these infractions.

HPV STATUS: Not Applicable.

RECOMMENDATION FOR

NEXT INSPECTION: It is recommended to check that the floating roof inspections are

conducted at least once every 12 months.

NSR RECOMMENDATIONS: None.

ATTACHMENTS: Oil Throughput Records, Breakdown Report, LDAR Monitoring

Plan, 2023 LDAR Inspection, 2022 LDAR Inspection

TANK ACTIVITY

			TAIN AC	
MONTH	Oil "IN	l" (truck to tank)	Oil "OUT	" (tank to railcar)
2024	Trucks	BBLs	Railcars	BBLs
1	4722	1,182,927.44	1775	1,125,947.22
2	4482	1,110,229.59	1780	1,131,444.53
2023	Trucks	BBLs	Railcars	BBLs
1	2467	652,737.20	1089	687,544.75
2	2521	668,175.90	1089	687,544.75
3	3521	643,895.46	902	576,356.84
4	2919	643,895.46	1176	754,969.67
5	3334	892,435.20	1458	936,678.57
6	3539	942,801.47	1465	943,433.33
7	4110	1,079,017.84	1442	928,453.54
8	3855	1,004,273.26	1534	994,444.97
9	3966	1,042,530.95	1685	1,083,570.02
10	4397	1,153,665.55	1763	1,132,321.09
11	4787	1,254,500.89	1968	1,258,545.95
12	5109	1,324,457.98	2136	1,360,143.48
2022	Trucks	BBLs	Railcars	BBLs
1	307	85,650,83	93	60.511.50

MONTH	GANTRY LOADING												
2023	TRUCKS OF	F-LOADED	RAILCA	RS LOADED									
9	362	89,183.63	136	85,938.71									
10	358	93,443.25	143	90,190.55									
11	129	33,124.68	55	34,936.00									

11	4787	1,254,500.89	1968	1,258,545.95		
12	5109	1,324,457.98	2136	1,360,143.48	Oil "OU	T" (tank to truck)
2022	Trucks	BBLs	Railcars	BBLs	Trucks	BBLs
1	307	85,650.83	93	60,511.50	0	0
2	289	80,301.75	111	71,931.07	0	0
3	574	160,669.23	163	104,180.36	0	0
4	738	206,390.78	176	112,844.98	90	17,178.99
5	891	246,225.00	333	215,997.92	150	41,889.87
6	539	147,815.42	306	200,382.64	0	0
7	848	235,266.86	244	159,666.18	87	24,360.01
8	969	267,268.35	376	245,728.12	49	13,844.92
9	798	218,916.45	421	274,623.76	133	37,361.99
10	1571	432,774.83	623	399,757.56	0	0
11	1895	524,824.12	654	418,403.59	0	0
12	1983	535,408.09	863	550,696.14	0	0

PRT 2024 CRUDE OIL ACTIVITY

	Oil "IN	" (truck to tank)	Oil "OUT" (tank to railcar)						
Month	Trucks	BBLs	Railcars	BBLs					
1	4722	1,182,927.44	1775	1,125,947.22					
2	4482	1,110,229.59	1780	1,131,444.53					
Q1	9204	2,293,157.03	3555	2,257,391.75					

PRT 2023 CRUDE OIL ACTIVITY

	Oil "IN	" (truck to tank)	Oil "OUT	" (tank to railcar)		
Month	Trucks	BBLs	Railcars	BBLs		
1	2467	652,737.20	1089	687,544.75		
2	2521	668,175.90	1089	687,544.75		
3	3521	643,895.46	902	576,356.84		
Q1	8509	1,964,808.56	3080	1,951,446.34		
4	2919	643,895.46	1176	754,969.67		
5	3334	892,435.20	1458	936,678.57		
6	3539	3539 942,801.47		943,433.33		
Q2	9792	2,479,132.13	4099	2,635,081.57		
7	4110	1,079,017.84	1442	928,453.54		
8	3855	1,004,273.26	1534	994,444.97		
9	4328	1,131,714.58	1821	1,169,508.73		
Q3	12293	3,215,005.68	1041	3,092,407.24		
10	4755	1,247,108.80	1906	1,222,511.64		
11	4916	1,287,625.57	2023	1,293,481.95		
12	5109	1,324,457.98	2136	1,360,143.48		
Q4	14780	3,859,192.35	6065	3,876,137.07		
2023	45374	11,518,138.72	14285	11,555,072.22		

PRT 2022 CRUDE OIL ACTIVITY

	Oil "IN	" (truck to tank)	Oil "OUT	" (tank to railcar)	Oil "OU	T" (tank to truck)
Month	Trucks	BBLs	Railcars	BBLs	Trucks	BBLs
1	307	85,650.83	93	60,511.50	0	0
2	289	80,301.75	111	71,931.07	0	0
3	574	160,669.23	163	104,180.36	0	0
Q1	1170	326,621.81	367	236,622.93	0	0
4	738	206,390.78	176	112,844.98	90	17,178.99
5	891	246,225.00	333	215,997.92	150	41,889.87
6	539	147,815.42	306	200,382.64	0	0
Q2	2168	600,431.20	815	529,225.54	240	59,068.86
7	848	235,266.86	244	159,666.18	87	24,360.01
8	969	267,268.35	376	245,728.12	49	13,844.92
9	798	218,916.45	421	274,623.76	133	37,361.99
Q3	2615	721,451.66	1041	680,018.06	269	75,566.92
10	1571	432,774.83	623	399,757.56	0	0
11	1895	524,824.12	654	418,403.59	0	0

12	1983	535,408.09	863	550,696.14	0	0
Q4	5449	1,493,007.04	2140	1,368,857.29	0	0
2022	11402	3,141,511.71	4363	2,814,723.82	509	134,635.78





October 24, 2023

Utah Department of Environmental Quality Division of Air Quality 195 North 1950 West P.O. Box 144820 Salt Lake City, UT 84116

RE: Price River Terminal Flare Malfunction - Industry Breakdown Report

To Whom It May Concern:

As required by R307-107-1(2) Price River Terminal (PRT), operating under Approval Order DAQE-AN148620001-15, is submitting this breakdown incident report regarding the malfunction and shutdown of the flare at PRT.

Cause and nature of the event

On Friday, October 6, at approximately 8 am, a terminal employee noticed during a routine walk-through that the gasket at the pressure relief valve on the flare condensate tank failed releasing VOC's at ground level. The flare was shut down to prevent ignition of released VOC's. At this time PRT was loading the last rail car on a unit train before the rail car loading process was shut down until repairs could be performed. By approximately 4 pm that same day, the failed gasket at the pressure release valve was removed and replaced with a new gasket. PRT then restarted the flare and began normal operations. As required by R307-107-1(1), PRT reported the breakdown to the Air Quality Division via the online Industry Breakdown Report at the following link: Industry Breakdown Report: Stationary Source Compliance - Utah Department of Environmental Quality. This notification was made within 24 hours of the breakdown as required by the regulations.

The following day, Saturday, October 7, PRT staff again discovered that the condensate tank pressure relief valve actuated and the flare was shut down to prevent a potential ignition of VOCs. PRT suspected the issue was being caused by higher than expected levels of condensate in the crude oil being transloaded beyond the capacity of the existing condensate tank. While researching the cause of the issue and potential solutions PRT resumed operations using the mobile transloaders while reducing fixed transloading through the storage tanks. On Monday, October 9, PRT staff determined that the condensate tank would function normally with lower fixed transloading rates and therefore the decision was made to transload only a third of normal loading rate and the flare was restarted at approximately 2:20 pm.

The solution to address the issue was to install a larger condensate tank and one was ordered. However, delivery time was estimated to be 5-6 weeks. In the interim PRT located a temporary condensate tank, which was installed on Saturday, October 21. Transloading to the rail cars was suspended during the installation of the temporary condensate tank and upon completion the terminal resumed normal operations at full capacity with a fully operating the flare to control VOC emissions.

Estimated quantity and time of emissions

While the flare was not operating PRT emitted uncontrolled VOCs for portions of four (4) days. During this time period 72,582 bbls of crude oil were transloaded resulting in uncontrolled VOC emissions of 4.1 tons of yellow wax. Because of the lower transloading volumes during the first half of 2023, and including the uncontrolled emissions during this breakdown, PRT does not expect to exceed the Approval Order limit of VOC emissions of 32.84 tons per year based on current projection.

If you have any questions or require further information, please contact me at (409) 721-4819 or via email at <u>Joshua.mcqueen@energytransfer.com</u>.

Sincerely,

少osh McQueen

Josh McQueen

Director of Operations – Energy Transfer Manager - Price River Terminal, LLC



Kyle Greenberg <kgreenberg@utah.gov>

Re: Price River Terminal (PRT) Condensate Tank Issue

3 messages

Rik Ombach <rombach@utah.gov>

Thu, Oct 19, 2023 at 8:37 AM

To: "Jennings, Michael" < Michael. Jennings@aptim.com>, Kyle Greenberg < kgreenberg@utah.gov>

Thanks Michael, I appreciate the update. Rik

On Thu, Oct 19, 2023 at 8:33 AM Jennings, Michael Michael.Jennings@aptim.com wrote:

Rik,

Hello again. I wanted to give you a quick update on PRT, the owner was able to find a temporary knock-out tank which will be installed today and will allow the terminal to operate at full capacity until the permanent replacement arrives in 4-5 weeks. The terminal will shut down rail car loading during the replacement. They've been operating around 1/3 of capacity to keep the flare active thus VOC emissions have been controlled. I'll send over a written report later today or tomorrow. Have a great day.

MICHAEL JENNINGS

Project Manager

APTIM | Environment and Sustainability

M 970 988 9371

E michael.jennings@aptim.com



5690 DTC Blvd, Suite 600

Greenwood Village, CO 80111

APTIM.com

From: Rik Ombach <rombach@utah.gov> Sent: Tuesday, October 10, 2023 4:50 PM

To: Jennings, Michael < Michael. Jennings@aptim.com >

Subject: Re: Price River Terminal (PRT) Condensate Tank Issue

EXTERNAL SENDER

Hi Michael, I would be happy to speak with you. I am out of town right now and could either speak later tonight or tomorrow afternoon. Can you text me your preference as I won't have a lot of access to email. My cell is 801-499-6095.

Rik

On Tue, Oct 10, 2023 at 3:42 PM Jennings, Michael Michael.Jennings@aptim.com wrote:

Rik,

Hello. PRT, located in Wellington, is a crude oil transloading terminal where they load oil from trucks into tanks and then into rail cars. They are currently having an issue with too much condensation in the knock-out tank that is connected to the flare that is greatly slowing operations and likely will lead to shut down in a few days. I was wondering if you are available for a phone call to discuss the situation and possible solutions. Thanks.

MICHAEL JENNINGS

Project Manager

APTIM | Environment and Sustainability

M 970 988 9371

E michael.jennings@aptim.com



5690 DTC Blvd, Suite 600

Greenwood Village, CO 80111

APTIM.com

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Rik Ombach

Manager | Oil and Gas

P: (801) 536-4164

airquality.utah.gov



Emails to and from this email address may be considered public records and thus subject to Utah GRAMA requirements.



Rik Ombach

Manager | Oil and Gas

P: (801) 536-4164 airquality.utah.gov

Emails to and from this email address may be considered public records and thus subject to Utah GRAMA requirements.

Jennings, Michael < Michael. Jennings@aptim.com>

To: Rik Ombach <rombach@utah.gov>, Kyle Greenberg <kgreenberg@utah.gov>

Tue, Oct 24, 2023 at 11:14 AM

Rik/Kyle, please see the attached report for the condensate tank issue at PRT. Everything is now working properly with the temporary tank. Please let me know if you have any questions.

[Quoted text hidden]

5690 DTC Blvd, Suite 600

Greenwood Village, CO 80111

APTIM.com



Rik Ombach

Manager | Oil and Gas

P: (801) 536-4164

airquality.utah.gov



Emails to and from this email address may be considered public records and thus subject to Utah GRAMA requirements.

[Quoted text hidden]



PRT Condensate Tank Malfunction_Breakdown Incident Report_Oct 2023.pdf 112K

Rik Ombach <rombach@utah.gov>

To: "Jennings, Michael" < Michael. Jennings@aptim.com>

Cc: Kyle Greenberg <kgreenberg@utah.gov>

Thanks Michael. I appreciate the report and keeping us informed throughout the process. Rik

[Quoted text hidden]

Thu, Oct 26, 2023 at 9:35 AM



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Rik Ombach

Manager | Oil and Gas Compliance

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PRICE RIVER TERMINAL FUGITIVE EMISSIONS MONITORING PLAN

Prepared for:



Prepared by:



APTIM Environmental 12005 Ford Rd, Suite 600 Dallas, Texas 75234

December 2018 Updated: January 2024



OGI Training Certificates

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Fugitive Emissions Monitoring Plan

1.0 Summary

The Leak Detection and Repair (LDAR) program for the Price River Terminal is used to address VOC fugitive emissions standards required by Utah Division of Air Quality. This requires annual inspection of all valves in VOC service, along with all pump, compressor, and agitator seals in VOC service. The facility is checked for leaks using the method described in the following sections.

2.0 LDAR Method

Optical Gas imaging (OGI) will be used to demonstrate compliance with the monitoring requirements using the latest FLIR Infra-Red imaging equipment. A certified optical imaging tech will slowly scan all equipment in VOC service following the pre-established route shown on the Site Path Map (Appendix A). All leaks found will be physically tagged and documented using the OGI Equipment Leak Log (Appendix A). The completed OGI Equipment Leak Log will be left with the operator at the end of testing. All leaks will have a first attempt repair within 5 days of leak, and a final repair is due within 15 days of the date found. All leak repairs will be verified using the OGI instrument.

3.0 Frequency of Survey

OGI LDAR survey will be conducted annually per the terminal permit.

4.0 Monitoring Equipment

LDAR surveys will be conducted using the FLIR GFx320 optical gas imaging camera. The camera is verified using calibration procedures in Section 6.0 prior to placing OGI camera in service and is checked and certified by the manufacturer (FLIR) to be in proper condition to find leaks. The camera is calibrated to measure temperature, allowing the user to achieve optimal thermal contrast between the gas compound and the background scene by changing thermal ranges.

The OGI camera is checked using method in Section 6.0. The OGI camera is then put thru simulated wind conditions to verify the maximum wind speed to detect leaks. A large high speed fan is used to blow across calibration gas tubing at increasing speed until gas cannot be seen. The wind speed is measured and recorded on the OGI Calibration Form, along with other all other information. The wind speed recorded for the initial certification is used as the maximum ambient wind speed to accurately detect leaks if the field.





5.0 Survey Procedure

On arriving at a facility, safety must always be the number one priority. The operator would begin by conducting a visual inspection of equipment components. He should document any safety concerns or changes to the facility. Leak detection will be conducted for all required equipment in VOC service; including all attached piping, valves, fittings, flanges, and open-ended lines. Begin a leak survey using an OGI camera to slowly scan all equipment in VOC service following the pre-established route from the starting point noted on the Site Path Map (Appendix A). When a leak is observed, a photograph of the leak source will be taken and a leak tag will be attached to the equipment to identify the source. The date of the leak and the part leaking is written on the tag. The leak is recorded in the OGI Equipment Leak Log (Appendix B), including the file name for the leak photograph. The OGI Equipment Leak Log is left with the facility at the end of each day. Leaking equipment is required to have a first attempt to repair within 5 days of the day the leak was found, and have final repair within 15 days from the day the leak is found with follow-up verification using the OGI camera.

If the repair is not feasible within 15 days (e.g., requires shutting down the unit, process, etc.), the component may be placed on the "delay of repair list" by incorporating the following information:

- The ID number;
- A detailed explanation as to why the component cannot be repaired immediately; and
- An estimated date to complete the repair.

After the leak has been repaired, resurvey the leak using the OGI camera and document the results.

6.0 Calibration Procedure

- Power on and cool down IR Camera. After camera has equilibrated to outside temperatures perform a non-uniformity correction (NUC) several times.
- **6.2** Establish a flow of calibration gas approximately equal to 60 grams/hour and document the furthest distance the camera operator can detect the gas flow and save a photo record.



PRT Price River Terminal

- **6.3** Record the following meteorological conditions on the OGI Calibration Form
 - ambient temperature
 - wind speed
 - % relative humidity
 - barometric pressure
- **6.4** Repeat the above for each camera configuration used
- **6.5** Equipment
 - IR Camera
 - Flow meter
 - Calibration Gas (10,000 ppmv 50% propane, 50% methane in air)
 - Electronic Measuring Device
 - Portable Meteorological Station
- 6.6 Chart Results in OGI Calibration Form (Appendix B)
 - Flow measurement
 - Detection distance
 - Ambient Temp
 - Wind Speed
 - % Relative Humidity
 - Barometric Pressure



Appendix A – Site Monitoring Plan



PRICE RIVER TERMINAL - SITE MONITORING PLAN

Location: Wellington, UT

Coordinates: 39°31′37″N, 110°42′15″W

Effected Equipment

All equipment in VOC service including valves, connectors, pressure relief devices, open-ended lines, flanges, pumps, compressors, instruments, and meters.

Monitoring and Leak Repair Process

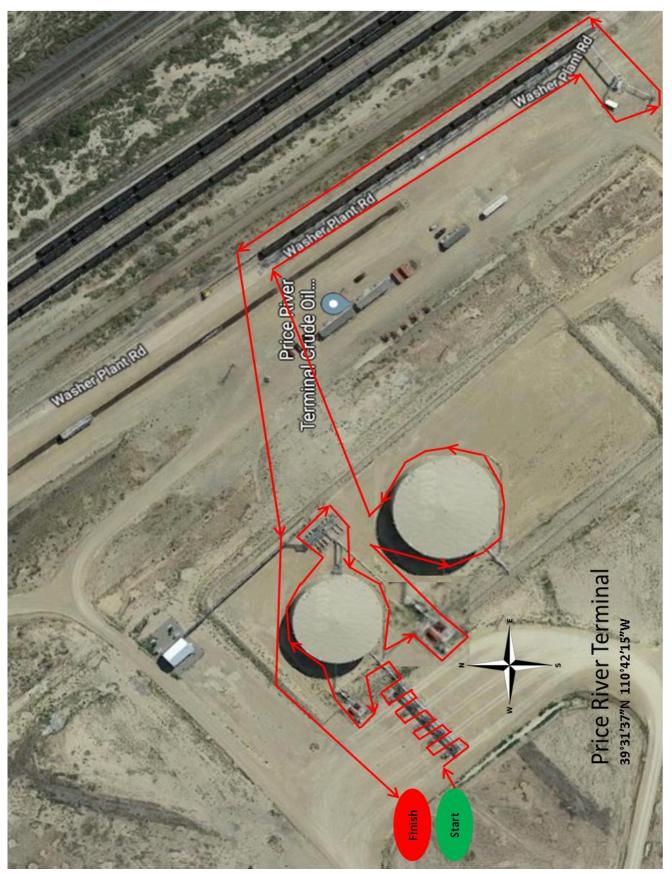
Aptim will monitor the site on an annual basis. The monitoring schedules will be communicated to the station foreman at least two weeks in advance of the monitoring. OGI monitoring is conducted using the FLIR GF-320 camera. Detailed specifications, certification, calibration, and operating procedures are located in the main LDAR Plan. When an equipment leak is found, Aptim will contact the appropriate Price River Terminal operations personnel via phone and email follow-up by noon of the next business day. Price River Terminal personnel will make a first attempt repair within 5 days of the Leak date, and will complete final repair or replace the leaking equipment within 15 calendar days of the date of discovery. If the repair or replacement cannot be completed without a vent blowdown, a shutdown, or would be unsafe to repair during operation of the unit, the repair or replacement must be completed during the next shutdown or within 2 years, whichever is earlier. When the leaking equipment is repaired/ replaced, the appropriate Price River Terminal personnel will contact Aptim via phone and email follow-up as soon as completed. Aptim personnel will re-monitor the repaired or replaced equipment after notification of the work is completed.

Recordkeeping and Reporting

A still image of each leak from the OGI inspection is recorded with component name, ID date of leak, is entered into the Guideware software for tracking and scheduling repairs. A still image of the repaired leak is recorded with repair and re-inspection dates. Records must be retained for 5 years.



Monitoring Path Diagram





Appendix B – Forms



OGI Calibration Form



Comments Tech Relative Barometric Humidity Pressure (%) Wind Speed (mph) Temp (F) Distance Photo File (m) Name Flow Camera Config Date



OGI Equipment Leak Log

Facility Name	Technician	Comments									
APTIM	OGI Equipment Leak Log	Location Description									
		Photo File Name									
		Comp Type									
		LDAR Tag#									
	OGI Camera ID	Date Found									



Appendix C OGI Training Certificates





LDAR Program Screening Survey 2023

Price River Terminal

Wellington, UT



Prepared by:

APTIM Environmental 12005 Ford Road, Suite 600 Dallas, Texas 75234

Project No. 723011751

December, 2023

APTIM Environmental (APTIM) conducted the fugitive emissions Leak Detection and Repair (LDAR) program annual leak detection survey at Price River Terminal December 19th, 2023. The LDAR survey was conducted as required by Utah Division of Air Quality Source Plan Review. This requires annual inspection of all equipment in VOC service including valves, connectors, pressure relief devices, open-ended lines, flanges, pumps, compressors, instruments, and meters.

1.0 Equipment Identification

Aptim worked with the plant operator to identify affected equipment. Aptim also updated the monitoring path drawing for the facility to reflect any changes since the last survey. The drawing shows the exact route used to completely survey all effected VOC equipment for leaks.

2.0 Leak Detection Procedures

As an Alternative Work Practice (AWP) for leak detection, an infrared camera for optical gas imaging may be used to survey equipment. All required quality assurance and operation and maintenance (O&M) procedures were followed. Joshua Lara conducted the screening activities following the Site Map/OGI Survey Paths for each facility (Appendix A).

All potential fugitive VOC emission sources were screened. The screening instrument used in the survey was a GF320 Infrared Imaging camera made by Flir Systems. The camera was used to scan all valve stems, packing glands, seals, and any other potential leak points. A weatherproof leaker tag marked with the date and the source number was attached to any leaking source.

A copy of each Field Leaking Components Log (Appendix B) is given to the plant contact, who routes the sheet to the maintenance department to initiate leak repair. Once repairs have been completed by the facility, the results are forwarded to APTIM where they are incorporated into this report.

3.0 Leak Detection Results

There was one (1) leak detected using the IR camera. Permit provisions state that any equipment in VOC service found to be leaking is required to have a first attempt repair made within 5 days of the leak date, and a final repair within 15 days of the leak, unless the repair causes excess emissions, or a process unit shutdown is required to complete. The Log of Leaking Components (Appendix B) lists and describes each source where a leak was detected. The OGI Calibration Form is included in Appendix C.

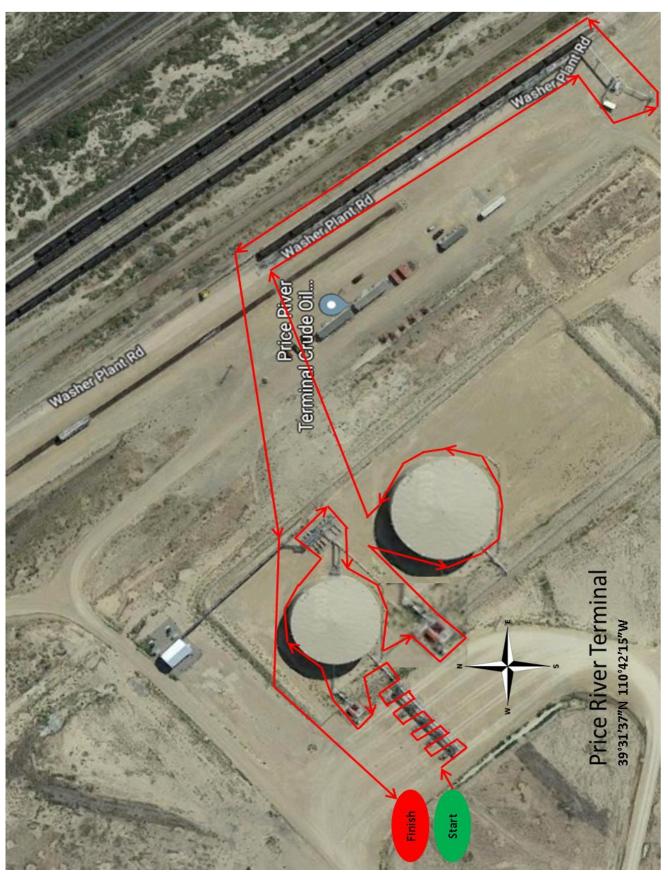


APPENDIX A

SITE MAP/OGI SURVEY PATH

Price River Terminal Wellington, UT







APPENDIX B

LOG OF LEAKING COMPONENTS December 2023

Price River Terminal Wellington, UT

JGI Camera ID: GF320 44402634 Survey Date: 12/19/2023 End Time: 10:00 AM Start Time: 8:00 AM



Facility Name: Price River Terminal

Technician: Joshua Lara Ambient Temp (F): 29 F

Sky Conditions: Partly Cloudy

Max Wind Speed (mph): 1 mph

Retest Reading										
Retest Date										
Repair Type										
Repair Date										
Location Description	Hose connection on 5th truck loading lane									
Photo File Name	DC4194									
Comp Type*	Connector									
LDAR Tag#	N/A									
Date Found	12/19/2023									

*Component Type: PRV, Valve, Pump, Connector

APPENDIX C

OGI CALIBRATION FORM December 2023

Price River Terminal Wellington, UT



OGI Daily Instrument Check

Date: 12/19/2023

Site Location: Price River Terminal

OGI Tech Name Joshua Lara

Camera ID: GF320 44402634

Ambient Temperature: 28F

Winds: 1 mph

Sky Condition: Partly Cloudy

Flow Rate	Distance (ft)	Auto (Yes/No)	Manual (Y/N MOV)	HSM (Y/N MOV)
Low	10 ft	No	Y, MOV4190	
Low	15 ft	No		Y, MOV4191
High	20 ft	No	Y, MOV4192	
High	25 ft	No		Y, MOV4193
	30 ft	n/a		
	35 ft	n/a		
	40 ft	n/a		



LDAR Program Screening Survey 2022

Price River Terminal

Wellington, UT



Prepared by:

APTIM Environmental 12005 Ford Road, Suite 600 Dallas, Texas 75234

Project No. 723011751

December, 2022

APTIM Environmental (APTIM) conducted the fugitive emissions Leak Detection and Repair (LDAR) program annual leak detection survey at Price River Terminal December 15th, 2022. The LDAR survey was conducted as required by Utah Division of Air Quality Source Plan Review. This requires annual inspection of all equipment in VOC service including valves, connectors, pressure relief devices, open-ended lines, flanges, pumps, compressors, instruments, and meters.

1.0 Equipment Identification

Reece Lemley worked with the plant operator to identify affected equipment. He also updated the monitoring path drawing for the facility to reflect any changes since the last survey. The drawing shows the exact route used to completely survey all effected VOC equipment for leaks.

2.0 Leak Detection Procedures

As an Alternative Work Practice (AWP) for leak detection, an infrared camera for optical gas imaging may be used to survey equipment. All required quality assurance and operation and maintenance (O&M) procedures were followed. Reece Lemley conducted the screening activities following the Site Map/OGI Survey Paths for each facility (Appendix A).

All potential fugitive VOC emission sources were screened. The screening instrument used in the survey was a GFx320 Infrared Imaging camera made by Flir Systems. The camera was used to scan all valve stems, packing glands, seals, and any other potential leak points. A weatherproof leaker tag marked with the date and the source number was attached to any leaking source.

A copy of each Field Leaking Components Log (Appendix B) is given to the plant contact, who routes the sheet to the maintenance department to initiate leak repair. Once repairs have been completed by the facility, the results are forwarded to APTIM where they are incorporated into this report.

3.0 Leak Detection Results

There were two (2) leaks detected using the IR camera. Permit provisions state that any equipment in VOC service found to be leaking is required to have a first attempt repair made within 5 days of the leak date, and a final repair within 15 days of the leak, unless the repair causes excess emissions, or a process unit shutdown is required to complete. The Log of Leaking Components (Appendix B) lists and describes each source where a leak was detected. The OGI Calibration Form is included in Appendix C.

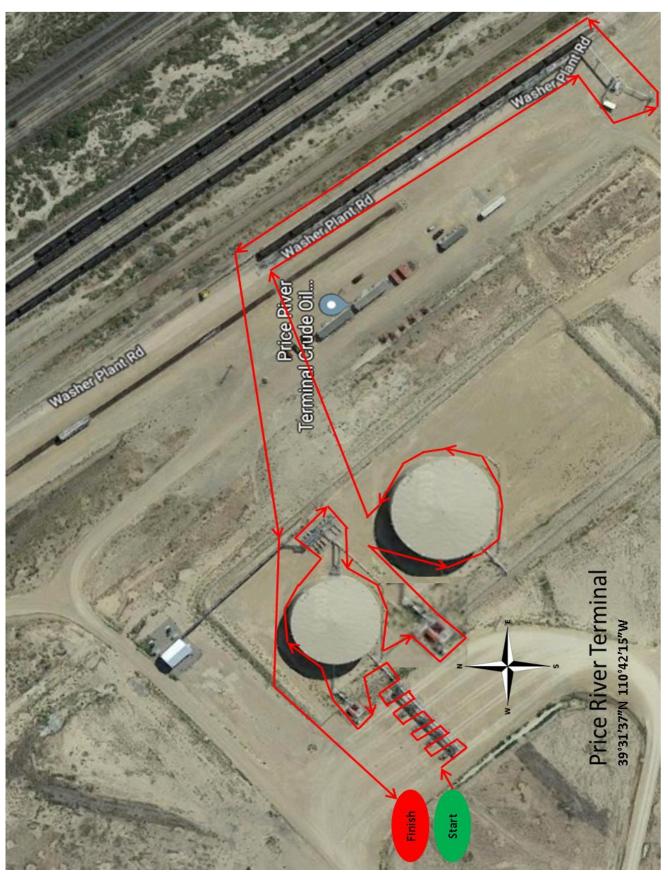


APPENDIX A

SITE MAP/OGI SURVEY PATH

Price River Terminal Wellington, UT







APPENDIX B

LOG OF LEAKING COMPONENTS December 2022

Price River Terminal Wellington, UT

Survey Date 2.15.22
Start Time 7:40AM
End Time 11-,054
OGI Camera ID (A - 200)



OOOOa,b,c OGI Equipment Leak Log

Facility Name Price River Termina
Technician Reece A. Lemley

			Photo File	Location Population			
Date Found	LDAR Tag #	Comp Type	Name MAA1/	Location Description	 		
	NONE	FL6	2864	LACT # Loading VLV Insulated FLG	 		
1215.22	NONE	Union	2864 2865	LACT# Loading VV Insulated FLG W Heater On 2" FIGLine to God			
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APPENDIX C

OGI CALIBRATION FORM December 2022

Price River Terminal Wellington, UT



Optical Gas Imaging (OGI) Daily Instrument Check

Price River Terminal

7.37AM

	ŗ]				Wind		Relative	T	
	:		Distance	Photo/Video		Speed	Barometric	Humidity		
15565	Camera Config	Flow	(m)	File Name	Temp (F)	(mph)	Pressure	(%)	Tech	Comments
12.1522	Manual	Hi	1594	M00:3863	16F	4 mph	30.331	60%	Reece Alunia,	Calibrated at Price Prive Terminal
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