

October 2017

Bayou Choctaw Pipeline (Redstick)

DOE ON-SITE REVIEW FINDING FORM

Site: Bayou Choctaw Pipeline (Redstick)

Names of Assessor: Terry Baxter, FFPO Environmental

Reference (Document number, title, section or paragraph number, etc.):

40 CFR 110 – Discharge of Oil

Requirement (Brief synopsis of what the reference requires):

Spill Releases – The discharge of oil in quantities harmful to the public health or welfare or to the environment is prohibited if it violates an applicable water quality standard or causes a film, sheen, sludge, or emulsion to form on the water surface.

Positive Finding:

There have been no spill releases from the Bayou Choctaw Pipeline (Redstick).

Findings Requiring Corrective Action: None

October 2017

St. James Terminal

DOE ON-SITE REVIEW FINDING FORM

Site: Sugarland Terminal

Names of Assessor: Terry Baxter, FFPO Environmental

Reference (Document number, title, section or paragraph number, etc.):

40 CFR 110 – Discharge of Oil

Requirement (Brief synopsis of what the reference requires):

Spill Releases – The discharge of oil in quantities harmful to the public health or welfare or to the environment is prohibited if it violates an applicable water quality standard or causes a film, sheen, sludge, or emulsion to form on the water surface.

Positive Finding:

There have been no spill releases from the Sugarland Terminal.

Findings Requiring Corrective Action: None

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St. James Terminal

DOE ON-SITE REVIEW FINDING FORM

Site: Sugarland Terminal

Names of Assessor: Terry Baxter, FFPO Environmental

Reference (Document number, title, section or paragraph number, etc.):

LAC 33:III.5 – Air Permits, and LAC 33:IX.3 – Water Permits

Requirement (Brief synopsis of what the reference requires):

Environmental Permits - Facilities in Louisiana that are sources of air emissions and water discharges are required to obtain air and water permits from the Louisiana Department of Environmental Quality (LDEQ).

Positive Finding:

The previous St. James site Title V air operating permit, LDEQ Permit No. 2560-00034-V7 was issued to the Shell Sugarland Terminal on 3/19/15, which expires on 3/19/20.

Shell submitted a permit modification application to LDEQ on 8/5/16 to delete Tanks 107 and 108 (non-DOE tanks) from the permit because the two tanks were added to Shell's Acadian River Terminal air permit. LDEQ issued Permit No. 2560-00034-V8 to Shell on 11/3/16, which expires on 3/19/20.

Shell submitted another permit modification application to LDEQ on 2/24/17 to request the use of temperature in lieu of oxygen in order to demonstrate compliance with the VCU monitoring required by 40 CFR 64. LDEQ issued Permit No. 2560-00034-V9 to Shell on 8/16/17, which expires on 3/19/20.

The current St. James site water discharge permit LPDES General Sanitary Class I Permit LAG534797 was issued on 5/27/14.

Findings Requiring Corrective Action: None

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St. James Terminal

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Names of Assessor: Terry Baxter, FFPO Environmental

Reference (Document number, title, section or paragraph number, etc.):

LAC 33:III.2108 – Marine Vapor Recovery

Requirement (Brief synopsis of what the reference requires):

Dock Air Emissions – Marine loading facilities serving ships and/or barge loading of crude oil with uncontrolled emissions of 100 tons/year or greater of volatile organic compounds (VOC's) require marine vapor recovery. Emissions from VOC with a true vapor pressure less than 1.5 psia at loading temperature of the crude oil are exempt.

Positive Findings:

The Shell dock air emissions are included in the site's current Title V air operating permit, LDEQ Permit No. 2560-00034-V9. Crude oil loading dock 1 (Source 7-78) is permitted for 37.75 tons/year of uncontrolled emissions of VOC's. The Marine Vapor Combustion Unit (Source VCU) is used to control the Dock 1 emissions and is permitted for 3.15 tons per year of VOC emissions.

Crude oil loading dock 2 (Source 8-78) is a low vapor pressure loading dock (materials less than 1.5 psia at loading temperature) and is permitted for 1.90 tons/year of VOC emissions.

Findings Requiring Corrective Action: None

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Reference (Document number, title, section or paragraph number, etc.):

LAC 33:III.2103 – Volatile Organic Liquid Tanks, and
40 CFR 60, Subparts Ka and Kb – Petroleum Liquid Storage Tanks

Requirement (Brief synopsis of what the reference requires):

Storage Tanks – Tanks storing more than 40,000 gallons of volatile organic (petroleum) liquids with a maximum true vapor pressure of 1.5 psia or greater must be equipped with a control device (floating roof with primary and secondary seals). Primary seals must be inspected for gaps every five years, with secondary seals inspected annually.

Positive Findings:

The six crude oil storage tanks at the St. James site are equipped with floating roofs and primary/secondary tank seals. Shell performed the scheduled tank seal gap inspection of all six crude oil storage tanks on 12/13/16 and 12/14/16.

Findings Requiring Corrective Action: None

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St. James Terminal

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Site: Sugarland Terminal

Names of Assessor: Terry Baxter, FFPO Environmental

Reference (Document number, title, section or paragraph number, etc.):

LAC 33:III.919 – Emissions Inventory

Requirement (Brief synopsis of what the reference requires):

Emissions Inventory – Facilities with a Title V air operating permit are required to submit an annual emissions inventory to LDEQ.

Positive Findings:

The St. James site Emissions Reporting and Inventory Center (ERIC) report was submitted electronically to LDEQ by Shell on 4/25/17.

Findings Requiring Corrective Action: None