Message

From: Kelly, Jack (R3 Phila.) [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6EABB849A5CB43A9904FEB0B53BABC48-JKELLY04]
Sent: 1/29/2020 10:54:22 PM
To: Patrick ONeill [Patrick.ONeill@Phila.gov]
Subject: Fwd: PES benzene refinery data

Pat. Just FYI

Jack Kelly
On Scene Coordinator
EPA Region III, Philadelphia
215-514-6792 (cell)
215-814-3112 (office)

Begin forwarded message:

From: "BARKSDALE JR, CHARLES D" <CHARLES.BARKSDALE@pes-companies.com>
Date: January 29, 2020 at 4:56:55 PM EST
To: "Kelly, Jack (R3 Phila.)" <Kelly.Jack@epa.gov>
Cc: "Augustine, Bruce" <augustine.bruce@epa.gov>
Subject: RE: PES benzene refinery data

Jack,

Friday should be OK if we keep to about an hour. This is the busiest report month for Environmental but most are done and should be out of my hands and on the way to the agencies by Friday.

I have no problems with your sharing the information with AMS or Patrick O'Neill. I shared this information with him verbally before.

We will not be prepared to review any of the 4th quarter results in detail as we have not compiled the data yet. We could probably share the highest point/location for each monitoring period.

Thanks,

Chuck Barksdale
215-339-2074 (office)
610-299-6260 (cell)

From: Kelly, Jack (R3 Phila.) [mailto:Kelly.Jack@epa.gov]
Sent: Wednesday, January 29, 2020 4:41 PM
To: BARKSDALE JR, CHARLES D <CHARLES.BARKSDALE@pes-companies.com>
Cc: Augustine, Bruce <augustine.bruce@epa.gov>
Subject: Re: PES benzene refinery data

Thanks very much, Chuck. I appreciate what is more than general info. I could stop by Friday if that works. .Wouldn't mind seeing the plant if even just from the office building. Won't stay long. If a problem then a call is ok.
This is more our Air Program's area but I just have a feeling additional inquiries will come up and I was there for a while, have an interest.

Would you mind if Bruce was present or listening in ... and someone from AMS?
Thanks again

Jack
Jack Kelly
On Scene Coordinator
EPA Region III, Philadelphia
215-514-6792 (cell)
215-814-3112 (office)

On Jan 29, 2020, at 4:20 PM, BARKSDALE JR, CHARLES D <CHARLES.BARKSDALE@pes-companies.com> wrote:

Jack,

Bruce and I have not discussed these results. I have had some discussions with Patrick O'Neill and Ramesh Mahadevan of the City.

I'll give you some general information, but it would be best to discuss.

We are continuing to conduct the passive monitoring.

Our emissions are down but not at background since we still have benzene in storage tanks in minor concentration in crude and gasoline. We have a few chemical tanks at higher concentration and we have emptied all but one "pure" benzene tank associated with our chemical operations. Many of the gasoline tanks are also empty now. Most of the emptying of tanks has occurred in the past 4-6 weeks.

In general, major sources of benzene emissions were the benzene tanks (on the fenceline) and the two Girard Point oil-water separators (on the fence line). The benzene tanks are near monitoring points 7 and 8. The 2 Separator is near monitoring point 14 and the 4 Separator is near monitoring point 16. More information about the separators and corrective actions have been provided previously to EPA.

We've had a couple of episodic events and one extended off-site source that caused elevated conditions. In May 2019, we loaded a low RVP heavy reformate into a barge at the Point Breeze refinery. The adjacent monitor (18) showed elevated benzene (189 ug/m3). This is an activity allowed by our permit but we didn't realize would cause such elevated readings. This is also a rare activity. As I'm sure you remember, we had a problem with a gasoline roof in July when the floating roof sank. We put foam on the roof to limit emissions and odors, but the benzene result for the nearby monitor (no. 1) on 26th Street was very elevated (189 ug/m3).

The off-site source is one you remember as it was related to an underground oil release impacting the river from a terminal across the river from the refinery. The emissions from the oil in the river (boomed in against their bulkhead) and from their recovery tank impacted our monitors significantly for several months (mostly point 13). I don't think we have any other significant off-site sources and this one appears to have been stopped or controlled.

Let me know when you'd like to discuss in more detail. I'm generally available the rest of this week and next week.

Thanks,

Chuck Barksdale
Environmental Director
215-339-2074 (office)
610-299-6260 (cell)

From: Kelly, Jack (R3 Phila.) [mailto:Kelly.Jack@epa.gov]
Sent: Wednesday, January 29, 2020 1:55 PM
To: BARKSDALE JR, CHARLES D <CHARLES.BARKSDALE@pes-companies.com>
Cc: Augustine, Bruce <augustine.bruce@epa.gov>
Subject: PES benzene refinery data

Hi Chuck,

I am sure you saw or heard about the article in the weblink below.
https://www.eenews.net/stories/1062097771
It required a response from EPA and became a topic at a recent Philly Air Pollution Control Board meeting.

Bruce may have contacted you already but, if not,.....and even if so..... can I either stop by or you give me a call to discuss the following?
If Bruce did not contact you, maybe he and I can coordinate a call or meeting with you.

I was trying to get info on the following:

- The status of operations and emissions at the plant.
- Do you continue to perform benzene sampling?
- Are you able to identify other potential non-PES sources in the area? (If not, I understand.)
- I apologize but I have not had a chance to go through all of the data as yet. Can you identify which stations tend to have the higher readings and why? I will eventually get through the data.

You can best reach me on my cell # any time.

Thank you!

Jack Kelly
On Scene Coordinator
EPA Region 3
215-514-6792 cell