UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I - EPA NEW ENGLAND

DATE: 4/10/12

SUBJ: Inspection at ExxonMobil Everett MA

FROM: Douglas Koopman, Environmental Engineer
Air Technical Unit

THRU: Christine Sansevero, Senior Enforcement Coordinator
Air Technical Unit

TO: File

I. Background Information

Date of inspection: 4/5/12

Weather Conditions: Partly Cloudy, Windy, Temp 45-50 F

Source Contact: Ernest Haynes – Terminal Superintendent ernest.e.haynes@exxonmobil.com
Phone Number: 617 381 2802

Mailing Address: Everett Terminal
52 Beacham Street
Everett, MA 02149

Personnel in Attendance:
Ernest Haynes ExxonMobile
Mike Butler ExxonMobile
Mike James ExxonMobile
John Kendall ExxonMobile
Karl Seibert Roux Associates
Darren Fortescue EPA
Doug Koopman EPA
Michael Looney EPA
William Osbahr EPA
Elizabeth Kudarauskis EPA

Title V Designation: Major source MBR-95-OPP-038

NIACS Code: 424170

AFS #: 2511900484

II. Purpose of Inspection

The purpose of this inspection was to determine if ExxonMobil has any storage tanks containing # 6 oil and to see if there are any emissions from those tanks.

III. Description of Facility

The ExxonMobil facility in Everett, MA is a bulk terminal which handles many types of petroleum products such as gasoline, diesel fuel, home heating oil and #6 oil. These products are stored in above and below ground storage tanks. The facility has 10 tanks used to store gasoline and roughly 80 other tanks used to store the other petroleum products. The facility operates a gasoline loading rack on site. Petroleum products arrive at the facility via barge or ship and are pumped to the appropriate tanks for storage. Small deliveries of gasoline additive arrive at the facility via tank truck.

This inspection focused on the four storage tanks (#'s 221, 222, 223 and 224) used to store #6 oil.

The terminal is open 24/7 365days a year and has 18 employees in the terminal and 3 fulltime employees in the front office.

IV. Inspection

The inspectors arrived at the facility at approximately 10:15am. The inspectors signed in at the main office and proceeded to a conference room. The inspectors presented their credentials and business cards to the ExxonMobil representatives.

Mr. James began the meeting by going over the safety procedures for the terminal and then Mr. Haynes welcomed the inspectors and passed around a sign-in sheet.

Ms. Kudarauskas began by explaining the purpose of the inspection. She explained that EPA had sent a 114 information letter to the terminal a year ago and this was a follow-up to that letter. Specifically EPA was at the terminal today to determine how much #6 fuel oil was on site and to inspect the tanks for any signs of emissions. She explained that Mr. Looney and Mr. Osbahr were from the EPA's lab in Chelmsford and had brought with them an infrared camera that can detect Volatile Organic Compounds (VOCs). Ms. Kudarauskas went on to explain that this was a regional initiative. EPA has found that tanks storing #6 oil have been giving off more VOC emissions than they have in the past. EPA is in the process of gathering additional information about this type of product and its storage.

Mr. Haynes explained that in the past the four tanks: 121, 122, 123 and 124 had all been used to store #6 oil for use at the adjacent power plant. He explained that the power plant leased the tanks from ExxonMobil and owned the oil. In roughly November or December 2010 the portion of the power plant that used #6 oil went out of business and shut down. At that time

ExxonMobil took control of the remaining product in the tank. Mr. Haynes explained that only tank 222 contained #6 oil and that there was roughly 9,000 barrels of oil left in that tank. The remaining tanks are empty.

Ms. Kudarauskas asked what the plans were for the remaining fuel oil. Mr. Haynes responded that ExxonMobil was trying to find a buyer for the remaining product and was hopeful that it would be moved offsite this year.

At this point the inspectors prepared to go outside to inspect the storage tanks. Mr. Haynes explained that they would have to pass thru the Sprague Energy facility across the street in order to get to the tanks. The inspectors walked across the street and signed in at the Sprague facility and then continued to the storage tanks. The storage tanks are rectangular in shape and are located below ground with a portion above ground which has an earthen berm surrounding it. (See figure 1). The inspectors climbed a staircase to the top of the tanks. At this point Mr. Looney used the inferred camera to observe the tank vents for any sign of VOC emissions. During the time on the roofs of the tanks Mr. Looney did not observe any VOC emissions from the tank vents. Mr. Koopman asked Mr. Haynes if he could describe the tanks construction. Mr. Haynes explained that the tanks were built in the 1950's and each could hold roughly 125,000 barrels or 5.25 million gallons. The tanks are built of cement and are lined with steel and have internal cross members to help support the walls.

After inspecting each tank the inspectors returned to the main office conference room for a closing conference.

VIII. Closing Conference

Ms. Kudarauskas explained that Mr. Looney did not detect any VOC emission from the vents of the #6 oil tanks. She asked that she be notified when ExxonMobile does finally remove the oil from the tank. Mr. Haynes stated that he would let her know when that happened. Ms. Kudarauskas thanked everyone for their time and this ended the inspection.

Figure 1

Courtland St
Exxon Mobile offices
Beacham St
Tank 224
Tank 223
Tank 222
Tank 221
Sprague energy terminal and tank farm

Earthen berm surrounding tank
Tank vents
Each Tank can hold 125,000 barrels