UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

November 22, 2017

Thomas Hudson, President
Hudson Terminal Corporation
29 Terminal Road
Providence, RI

Re: Clean Air Act Reporting Requirement and Testing Order

Dear Mr. Hudson:

On January 3, 2017, the United States Environmental Protection Agency ("EPA") issued a reporting requirement and testing order to the Hudson Terminal Corporation regarding its facility located at 29 Terminal Road in Providence, Rhode Island ("Hudson"). In a letter, dated April 12, 2017, Triton Environmental, Inc., on behalf of the Hudson Terminal, submitted a response to EPA.

EPA has evaluated the response, including the proposed emissions testing methodology. In the response letter, Hudson has proposed not to use the method required by EPA's testing order, known as EPA Reference Method 204 monitoring. In lieu of Reference Method 204, Hudson has proposed to use a vane anemometer to measure gas flow. The proposed use of a vane anemometer is not based on an EPA reference method, and there are other problems associated with the proposal that would tend to make the proposed approach unreliable. The testing protocol is not approvable at this time for purposes of testing VOC emissions at the Hudson Terminal.

However, based on other information that Hudson provided in response to the reporting requirement, EPA agrees to suspend the testing requirement until further notice. Hudson will not be required to prepare for and conduct the testing described in the testing order of January 3, 2017.

Please contact the lead engineer, Beth Kudarauskas, at 617-918-1564, or Senior Enforcement Counsel, Tom Olivier, at 617-918-1737, if you have any questions or would like to set up a call to discuss this matter further.

Sincerely,

Steve Rapp, Chief
Air Technical Unit