INTERNATIONAL LIQUID TERMINALS ASSOCIATION

May 12, 2021

Acting Assistant Administrator Joe Goffman
Acting Assistant Administrator Lawrence Starfield
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Acting Assistant Administrators Starfield and Goffman:

On behalf of our member companies, ILTA is seeking temporary waivers of certain air emissions requirements in light of operational challenges related to the temporary shutdown of Colonial pipeline. Failure to receive these waivers will likely result in further curtailing of terminals' operations in gasoline and diesel fuel distribution. Your assistance is urgently needed to avoid further operational disruptions at fuel storage terminals across the seventeen states served by Colonial pipeline.

ILTA members are liquid terminal companies, responsible for the handling, storage, blending, and transport logistics of bulk liquid products including gasoline. Terminals make intermodal connections along the supply chain possible. For example, many refined products terminals receive product delivered via pipeline, provide blending services on site, and then transfer the gasoline to loading docks. Terminal companies manage complicated logistics to ensure safe, secure loading operations for tanker truck drivers who then deliver their gasoline and diesel cargoes to fueling stations.

During the unprecedented closure of Colonial pipeline, many terminals are experiencing substantially diminished rates of product turnover. This constraint makes it difficult to meet blending requirements and stay within RVP guidelines. Additionally, some terminals are seeking to accommodate low product levels by consolidating gasoline or diesel into fewer tanks. As tanks are emptied in the consolidation process, the floating roofs used to control emissions must be "landed" on the tank floor. Landing of a floating roof is normally undesirable and is regulated under Subpart Kb and NESHAP Subpart BBBBBB.

ILTA member companies take compliance with EPA emissions standards very seriously. In the absence of a waiver, many terminal companies will make the business decision to forgo operations rather than create the possibility of exceeding emissions limits. By granting the appropriate waivers to terminals operating along the Colonial pipeline, EPA will allow terminal companies the flexibility they need to optimize existing resources and support fuel distribution efforts during this critical time.

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I would welcome the opportunity to discuss this request with you or a member of your team. I can be reached at kclay@ilta.org or (571) 217-4931. Thank you for your consideration and I look forward to hearing from you.

Sincerely,



Kathryn Clay
President
International Liquid Terminals Association

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