



ZENITH ENERGY TERMINALS HOLDINGS LLC

3900 Essex Lane, Suite 700
Houston, Texas 77027

October 14th, 2022

Nina DeConcini
Department of Environmental Quality
Northwest Region Portland Office
700 NE Multnomah Street, Suite 600
Portland, OR 97232-4100

**Re: Amendment to Addendum to Zenith Title V Renewal Application
Title V Permit No. 26-2025**

Dear Ms. DeConcini:

By letter dated October 3, 2022, Zenith Energy Terminals Holdings LLC (“Zenith”) submitted an addendum to its March 25, 2011 Title V renewal for the facility on Front Avenue in Portland (the “Addendum”). In the Addendum, we identified our commitment to remove the 30 existing tanks identified in blue in Exhibit A-1 to the October 3, 2022 Land Use Compatibility Statement issued by the City of Portland (the “LUCS”). As requested, we are amending the Addendum to request that the Department include in the renewed Title V permit a condition requiring that the 30 tanks identified in Exhibit A-1 be removed consistent with the following schedule:

- By October 3, 2024, no less than seven storage tanks shall have been disassembled and removed;
- By October 3, 2026, no less than 14 storage tanks shall have been disassembled and removed;
- By October 3, 2028, no less than 21 storage tanks shall have been disassembled and removed; and
- By October 3, 2029, all 30 of the designated storage tanks shall have been disassembled and removed.

Consistent with the language in the LUCS, if storage tank disassembly and removal pursuant to the above timeline is delayed by force majeure, this timeline shall be adjusted accordingly.



3900 Essex Lane, Suite 700
Houston, TX 77027
(713) 395-6200

I have included with this letter an AP101R form certifying the accuracy and completeness of this submittal. Please let me know if you have any questions concerning this letter.

Sincerely,

A handwritten signature in black ink that reads "Shannon Caldwell".

Shannon Caldwell
Vice President of HSE and Regulatory

cc: Paul Garrahan
Grady Reamer
Dana Love
Tom Wood
Eric Martin

**Administrative Information and Certification
Supplemental Information**

**FORM AP101R
Answer Sheet**

Facility name:	Zenith Energy Terminals Holdings LLC	Permit Number:	26-2025
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Contact Person:	Name	Shannon Caldwell
	Title	VP of HSE & Regulatory
	Phone number	(713) 395-6231
	e-mail address	shannon.caldwell@zenithterminals.com
	Fax number	

Statement of Certification:

I have reviewed the attached documents submitted in addition to or in revision of the Oregon Title V Operating Permit application, and all supporting documentation in their entirety. To the best of my knowledge, information, and belief formed after reasonable inquiry, the statements and information contained herein are true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and/or imprisonment for knowing violations.

Shannon C. Caldwell

Name of Responsible Official

VP of HSE & Regulatory

Title of Responsible Official



Signature of Responsible Official

10/14/2022

Date