

# 112(r)/Air Enforcement: U.S. Environmental Protection Agency and Baltimore Petroleum Product Terminal Enter Into Consent Agreement



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The United States Environmental Protection Agency (“EPA”) and Energy Transfer Marketing & Terminals L.P. (“ETMT”) entered into a March 23rd Consent Agreement (“CA”) addressing an alleged violation of the Clean Air Act regulations. See Docket No. CAA-03-2026-0074.

The CA provides that ETMT is the owner and operator of a petroleum product terminal and transfer facility located in Baltimore, Maryland.

EPA representatives are stated to have conducted a compliance evaluation inspection on April 24, 2024, to evaluate the facility’s compliance with Section 112(r) of the Clean Air Act and its regulations. Inspectors are stated to have evaluated pertaining to the Pentane Pressure Vessel, including a 2020 Pressure Vessel Inspection and Design Calculation Report.

An energy transfer contractor is stated to have found in a 2020 report that the contractor had calculated the maximum allowable circumferential stress for the Pentane Pressure Vessel’s saddle supports to be 26,250 psi and calculated the actual operational circumferential stress on the right and left saddle supports to be 31,815 psi and 32,430 psi, respectively.

In response to EPA queries, facility personnel are stated to have conducted an additional inspection of the Pentane Pressure Vessel and prepared a new inspection and design calculation report. Facility personnel are stated to have calculated the maximum allowable circumferential stress for the Pentane Pressure Vessel’s saddle supports to be 26,250 psi; Facility personnel calculated the actual operational circumferential stress for the right and left saddle supports to be 38,609 psi and 38,688 psi, respectively.

ETMT subsequently submitted documentation to EPA indicating that it had corrected the excessive circumferential stress exerted on the saddle horns of the Pentane Pressure Vessel.

The CA alleges the following violation:

- Failure to Correct Deficiency in Process Equipment.

A civil penalty of \$185,000 is assessed.

A copy of the CA can be found [here](#).