



April 22, 2025  
Sent via Email: [melanielandry@imtt.com](mailto:melanielandry@imtt.com)  
Leaaf Project No.: IMT-004

Melanie V. Landry  
Environmental Regulatory Compliance Manager  
International-Matex Tank Terminals

**RE: Independent Third Party Fenceline Monitoring  
1<sup>st</sup> Quarter 2025 Report  
International-Matex Tank Terminals  
11842 River Road, St. Rose, LA 70087  
AI# 4885**

Dear Melanie Landry:

The following letter report summarizes the findings of the independent third-party monitoring performed by Leaaf Environmental, LLC (Leaaf) from January 6<sup>th</sup>, 2024 to April 9<sup>th</sup>, 2025 at the International-Matex Tank Terminal property located at 11842 River Road, St. Rose, Louisiana 70047 (IMTT St Rose).

#### **Executive Summary**

IMTT St. Rose has contracted an independent third-party to perform continuous monitoring of ambient air at the facility fence line in accordance with Environmental Protection Agency (EPA) Method 325 since May 29, 2021. Compliance with EPA Method 325 requires quantification of ambient benzene concentrations from twenty-four (24) permanent monitoring stations along the facility perimeter using passive diffusion air samplers. All but one sample kit was processed and analyzed by a third-party provider along with two duplicate samples and two field blanks per sample set.

All submittable sample results for the 1<sup>st</sup> Quarter yielded Sampling Period Concentration Changes that were below applicable action levels at a range of 0.15 – 3.1 µg/m<sup>3</sup>. Quarterly averages were calculated once data from six (6) two-week sample periods have been collected in accordance with 40 CFR §63.655(h)(8)(iv). Prior to quarterly data submittal to the Environmental Protection Agency Compliance and Emissions Data Reporting Interface, results were reviewed and approved by Leaaf Environmental representatives. All analytical data can be found below: **Attachment 1 and Attachment 2.**

Sampling delays which required rescheduling on an alternate date did occur during this period from January 21<sup>st</sup> to January 22<sup>nd</sup> in which heavy snowfall inhibited access to the site and all monitoring locations until January 24<sup>th</sup>. Sampling was rescheduled and conducted the following Monday, January 27<sup>th</sup>. Due to the length of time elapsed, analysis from the samples collected on January 27<sup>th</sup> were voided. All other sampling in the 1<sup>st</sup> Quarter remained in compliance. The aforementioned snow from January 21<sup>st</sup> and 22<sup>nd</sup> and site conditions inhibited access to monitor locations. Temperatures ranged from 13 °F in January to 86 °F in April with relative humidity ranged from a low of 25% in March to 99% in January, February, and March. No changes to monitoring station locations have been observed.

Leaaf appreciates this opportunity to work with you. Please do not hesitate to contact me at (504) 841-9810 if you have any questions.

Sincerely,

**Leaaf Environmental, LLC**

A handwritten signature in blue ink, appearing to read 'Joe Dupepe', is written over a faint circular stamp.

Joseph Dupepe, EI  
Engineer

## **Appendix**

**Attachment 1 – Sampling Period Identification**

**Attachment 2 – 1<sup>st</sup> Quarter Benzene Analytical Results**

**Attachment 3 – Monitoring Stations Photolog**

# Attachment 1 – Sampling Period Identification

## Attachment 1: Sampling Period Identification

IMTT

Agency Interest Number: 4885

Facility Record No. * (Select from dropdown list)	Sampling Period ID *	Sampling Period Start Date * (\$63.655(h)(8)(iv))	Sampling Period End Date * (\$63.655(h)(8)(iv))	Sampling Period $\Delta c$ * ( $\mu\text{g}/\text{m}^3$ ) (\$63.655(h)(8)(iv))	Annual Average $\Delta c$ * ( $\mu\text{g}/\text{m}^3$ ) (\$63.655(h)(8)(iv))	Comments
1	2025-78	01/06/25	01/27/25	Null	Null	Annual Average $\Delta c$ calculation requires 26 two-week sample periods
1	2025-79	01/27/25	02/10/25	0.93	0.9117	Annual Average $\Delta c$ calculation requires 26 two-week sample periods
1	2025-80	02/10/25	02/24/25	0.72	0.8992	Annual Average $\Delta c$ calculation requires 26 two-week sample periods
1	2025-81	02/24/25	03/10/25	0.88	0.8996	Annual Average $\Delta c$ calculation requires 26 two-week sample periods
1	2025-82	03/10/25	03/25/25	0.82	0.8850	Annual Average $\Delta c$ calculation requires 26 two-week sample periods
1	2025-83	03/25/25	04/09/25	0.8	0.8833	Annual Average $\Delta c$ calculation requires 26 two-week sample periods

## Attachment 2 – 1<sup>st</sup> Quarter Benzene Analytical Results

## Attachment 2: 1st Quarter Benzene Analytical Results

IMTT

Agency Interest Number: 4885

Sampling Period ID	Sampler Name	Passive Sampler Type	Sampling Period Benzene Concentration (ug/m3)	Below Method Detection Limit (BDL)
2025-78	SP-01	Regular Monitor	n/a	n/a
2025-78	SP-02	Regular Monitor	n/a	n/a
2025-78	SP-03	Regular Monitor	n/a	n/a
2025-78	SP-04	Regular Monitor	n/a	n/a
2025-78	SP-05	Regular Monitor	n/a	n/a
2025-78	SP-06	Regular Monitor	n/a	n/a
2025-78	SP-07	Regular Monitor	n/a	n/a
2025-78	SP-08	Regular Monitor	n/a	n/a
2025-78	SP-09	Regular Monitor	n/a	n/a
2025-78	SP-10	Regular Monitor	n/a	n/a
2025-78	SP-11	Regular Monitor	n/a	n/a
2025-78	SP-12	Regular Monitor	n/a	n/a
2025-78	SP-13	Regular Monitor	n/a	n/a
2025-78	SP-14	Regular Monitor	n/a	n/a
2025-78	SP-15	Regular Monitor	n/a	n/a
2025-78	SP-16	Regular Monitor	n/a	n/a
2025-78	SP-17	Regular Monitor	n/a	n/a
2025-78	SP-18	Regular Monitor	n/a	n/a
2025-78	SP-19	Regular Monitor	n/a	n/a
2025-78	SP-20	Regular Monitor	n/a	n/a
2025-78	SP-21	Regular Monitor	n/a	n/a
2025-78	SP-22	Regular Monitor	n/a	n/a
2025-78	SP-23	Regular Monitor	n/a	n/a
2025-78	SP-24	Regular Monitor	n/a	n/a
2025-78	D-01	Regular Monitor	n/a	n/a
2025-78	FB-01	Field Blank	n/a	n/a
2025-78	D-02	Regular Monitor	n/a	n/a
2025-78	FB-02	Field Blank	n/a	n/a

## Attachment 2: 1st Quarter Benzene Analytical Results

IMTT

Agency Interest Number: 4885

Sampling Period ID	Sampler Name	Passive Sampler Type	Sampling Period Benzene Concentration (ug/m3)	Below Method Detection Limit (BDL)
2025-79	SP-01	Regular Monitor	0.69	no
2025-79	SP-02	Regular Monitor	0.66	no
2025-79	SP-03	Regular Monitor	0.62	no
2025-79	SP-04	Regular Monitor	0.58	no
2025-79	SP-05	Regular Monitor	0.63	no
2025-79	SP-06	Regular Monitor	0.57	no
2025-79	SP-07	Regular Monitor	0.48	no
2025-79	SP-08	Regular Monitor	0.56	no
2025-79	SP-09	Regular Monitor	0.62	no
2025-79	SP-10	Regular Monitor	0.65	no
2025-79	SP-11	Regular Monitor	0.73	no
2025-79	SP-12	Regular Monitor	0.89	no
2025-79	SP-13	Regular Monitor	1	no
2025-79	SP-14	Regular Monitor	1.1	no
2025-79	SP-15	Regular Monitor	2.4	no
2025-79	SP-16	Regular Monitor	3.1	no
2025-79	SP-17	Regular Monitor	0.96	no
2025-79	SP-18	Regular Monitor	0.92	no
2025-79	SP-19	Regular Monitor	0.83	no
2025-79	SP-20	Regular Monitor	1.6	no
2025-79	SP-21	Regular Monitor	0.76	no
2025-79	SP-22	Regular Monitor	0.65	no
2025-79	SP-23	Regular Monitor	0.81	no
2025-79	SP-24	Regular Monitor	1.2	no
2025-79	D-01	Regular Monitor	0.64	no
2025-79	FB-01	Field Blank	0.15	yes
2025-79	D-02	Regular Monitor	0.51	no
2025-79	FB-02	Field Blank	0.15	yes



## Attachment 2: 1st Quarter Benzene Analytical Results

IMTT

Agency Interest Number: 4885

Sampling Period ID	Sampler Name	Passive Sampler Type	Sampling Period Benzene Concentration (ug/m3)	Below Method Detection Limit (BDL)
2025-80	SP-01	Regular Monitor	0.61	no
2025-80	SP-02	Regular Monitor	0.57	no
2025-80	SP-03	Regular Monitor	0.6	no
2025-80	SP-04	Regular Monitor	0.54	no
2025-80	SP-05	Regular Monitor	0.59	no
2025-80	SP-06	Regular Monitor	0.55	no
2025-80	SP-07	Regular Monitor	0.44	no
2025-80	SP-08	Regular Monitor	0.62	no
2025-80	SP-09	Regular Monitor	0.56	no
2025-80	SP-10	Regular Monitor	0.55	no
2025-80	SP-11	Regular Monitor	0.55	no
2025-80	SP-12	Regular Monitor	1.2	no
2025-80	SP-13	Regular Monitor	0.57	no
2025-80	SP-14	Regular Monitor	0.79	no
2025-80	SP-15	Regular Monitor	1.1	no
2025-80	SP-16	Regular Monitor	1.4	no
2025-80	SP-17	Regular Monitor	0.74	no
2025-80	SP-18	Regular Monitor	0.84	no
2025-80	SP-19	Regular Monitor	0.83	no
2025-80	SP-20	Regular Monitor	0.71	no
2025-80	SP-21	Regular Monitor	0.81	no
2025-80	SP-22	Regular Monitor	0.8	no
2025-80	SP-23	Regular Monitor	0.73	no
2025-80	SP-24	Regular Monitor	0.82	no
2025-80	D-01	Regular Monitor	0.61	no
2025-80	FB-01	Field Blank	0.15	yes
2025-80	D-02	Regular Monitor	0.5	no
2025-80	FB-02	Field Blank	0.15	yes

## Attachment 2: 1st Quarter Benzene Analytical Results

IMTT

Agency Interest Number: 4885

Sampling Period ID	Sampler Name	Passive Sampler Type	Sampling Period Benzene Concentration (ug/m3)	Below Method Detection Limit (BDL)
2025-81	SP-01	Regular Monitor	0.67	no
2025-81	SP-02	Regular Monitor	0.68	no
2025-81	SP-03	Regular Monitor	0.69	no
2025-81	SP-04	Regular Monitor	0.62	no
2025-81	SP-05	Regular Monitor	0.68	no
2025-81	SP-06	Regular Monitor	0.59	no
2025-81	SP-07	Regular Monitor	0.46	no
2025-81	SP-08	Regular Monitor	0.58	no
2025-81	SP-09	Regular Monitor	0.54	no
2025-81	SP-10	Regular Monitor	0.64	no
2025-81	SP-11	Regular Monitor	0.84	no
2025-81	SP-12	Regular Monitor	1.6	no
2025-81	SP-13	Regular Monitor	0.81	no
2025-81	SP-14	Regular Monitor	0.91	no
2025-81	SP-15	Regular Monitor	1.6	no
2025-81	SP-16	Regular Monitor	2.3	no
2025-81	SP-17	Regular Monitor	0.87	no
2025-81	SP-18	Regular Monitor	0.83	no
2025-81	SP-19	Regular Monitor	0.88	no
2025-81	SP-20	Regular Monitor	0.87	no
2025-81	SP-21	Regular Monitor	1.1	no
2025-81	SP-22	Regular Monitor	0.99	no
2025-81	SP-23	Regular Monitor	0.93	no
2025-81	SP-24	Regular Monitor	1	no
2025-81	D-01	Regular Monitor	0.73	yes
2025-81	FB-01	Field Blank	0.15	no
2025-81	D-02	Regular Monitor	0.5	no
2025-81	FB-02	Field Blank	0.15	yes

## Attachment 2: 1st Quarter Benzene Analytical Results

IMTT

Agency Interest Number: 4885

Sampling Period ID	Sampler Name	Passive Sampler Type	Sampling Period Benzene Concentration (ug/m3)	Below Method Detection Limit (BDL)
2025-82	SP-01	Regular Monitor	0.68	no
2025-82	SP-02	Regular Monitor	0.6	no
2025-82	SP-03	Regular Monitor	0.58	no
2025-82	SP-04	Regular Monitor	0.61	no
2025-82	SP-05	Regular Monitor	0.61	no
2025-82	SP-06	Regular Monitor	0.54	no
2025-82	SP-07	Regular Monitor	0.46	no
2025-82	SP-08	Regular Monitor	0.47	no
2025-82	SP-09	Regular Monitor	0.58	no
2025-82	SP-10	Regular Monitor	0.73	no
2025-82	SP-11	Regular Monitor	0.81	no
2025-82	SP-12	Regular Monitor	0.76	no
2025-82	SP-13	Regular Monitor	0.93	no
2025-82	SP-14	Regular Monitor	0.96	no
2025-82	SP-15	Regular Monitor	2.1	no
2025-82	SP-16	Regular Monitor	1.9	no
2025-82	SP-17	Regular Monitor	0.86	no
2025-82	SP-18	Regular Monitor	0.76	no
2025-82	SP-19	Regular Monitor	0.71	no
2025-82	SP-20	Regular Monitor	0.66	no
2025-82	SP-21	Regular Monitor	0.86	no
2025-82	SP-22	Regular Monitor	0.8	no
2025-82	SP-23	Regular Monitor	0.84	no
2025-82	SP-24	Regular Monitor	1.1	no
2025-82	D-01	Regular Monitor	0.71	yes
2025-82	FB-01	Field Blank	0.14	no
2025-82	D-02	Regular Monitor	0.64	no
2025-82	FB-02	Field Blank	0.14	yes

## Attachment 2: 1st Quarter Benzene Analytical Results

IMTT

Agency Interest Number: 4885

Sampling Period ID	Sampler Name	Passive Sampler Type	Sampling Period Benzene Concentration (ug/m3)	Below Method Detection Limit (BDL)
2025-83	SP-01	Regular Monitor	0.52	no
2025-83	SP-02	Regular Monitor	0.51	no
2025-83	SP-03	Regular Monitor	0.47	no
2025-83	SP-04	Regular Monitor	0.53	no
2025-83	SP-05	Regular Monitor	0.39	no
2025-83	SP-06	Regular Monitor	2.3	no
2025-83	SP-07	Regular Monitor	0.61	no
2025-83	SP-08	Regular Monitor	0.55	no
2025-83	SP-09	Regular Monitor	0.45	no
2025-83	SP-10	Regular Monitor	0.34	no
2025-83	SP-11	Regular Monitor	0.84	no
2025-83	SP-12	Regular Monitor	0.66	no
2025-83	SP-13	Regular Monitor	0.75	no
2025-83	SP-14	Regular Monitor	0.79	no
2025-83	SP-15	Regular Monitor	1.2	no
2025-83	SP-16	Regular Monitor	2.3	no
2025-83	SP-17	Regular Monitor	1.7	no
2025-83	SP-18	Regular Monitor	0.89	no
2025-83	SP-19	Regular Monitor	0.57	no
2025-83	SP-20	Regular Monitor	0.47	no
2025-83	SP-21	Regular Monitor	0.71	no
2025-83	SP-22	Regular Monitor	0.56	no
2025-83	SP-23	Regular Monitor	0.69	no
2025-83	SP-24	Regular Monitor	1.1	no
2025-83	D-01	Regular Monitor	0.54	yes
2025-83	FB-01	Field Blank	0.14	no
2025-83	D-02	Regular Monitor	0.4	no
2025-83	FB-02	Field Blank	0.14	yes

## Attachment 3 – Monitoring Stations Photolog

Most Photos recorded on January 6, 2025, before sample collection.



**Photo 1:** SP-01, D-01, and FB-01 at  
29.943277711, -90.3253258923



**Photo 2:** SP-02 at  
29.9411412344, -90.325342634



**Photo 3:** SP-03 at  
29.9394200915, -90.3268712946



**Photo 4:** SP-04 at  
29.9386318317, -90.3292500299



Most Photos recorded on January 6, 2025, before sample collection.



**Photo 5:** SP-05 at  
29.9380837937, -90.331925551



**Photo 6:** SP-06 at  
29.9380837937, -90.331925551



**Photo 7:** SP-07 at  
29.9410213539, -90.3359376633



**Photo 8:** SP-08, D-02, and FB-02 at  
29.9431684342, -90.3362445632



Most Photos recorded on January 6, 2025, before sample collection.



**Photo 9:** SP-09 at  
29.9449959344, -90.3363811386



**Photo 10:** SP-10 at  
29.9461147497, -90.3340379477  
Taken 3/10/25



**Photo 11:** SP-11 at  
29.9467017959, -90.3328176494



**Photo 12:** SP-12 at  
29.9490024499, -90.3330959373



Most Photos recorded on January 6, 2025, before sample collection.



**Photo 13:** SP-13 at  
29.9500048373, -90.3334608657



**Photo 14:** SP-14 at  
29.951725398, -90.3340016192



**Photo 15:** SP-15 at  
29.9530075012, -90.3344045829



**Photo 16:** SP-16 at  
29.9539512251, -90.333328629



Most Photos recorded on January 6, 2025, before sample collection.



**Photo 17: SP-17 at**
  
 29.9545196268, -90.3324420279



**Photo 18: SP-18 at**
  
 29.9551728926, -90.3314230306



**Photo 19: SP-19 at**
  
 29.9558851837, -90.3294830958
   
 Taken 1/27/25



**Photo 20: SP-20 at**
  
 29.9542923122, -90.3287913658



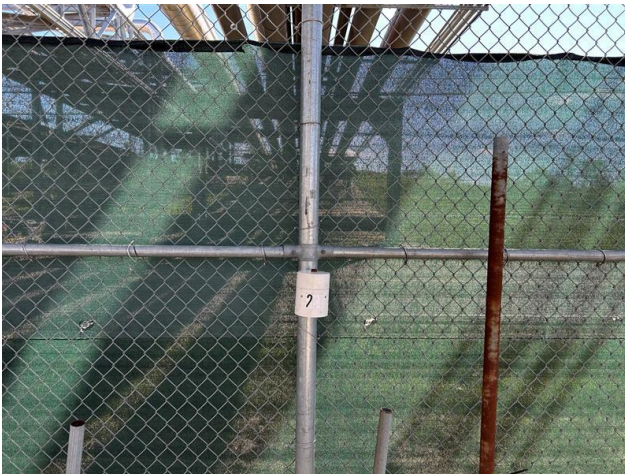
Most Photos recorded on January 6, 2025, before sample collection.



**Photo 21:** SP-21 at  
29.9505393134, -90.3266837564



**Photo 22:** SP-22 at  
29.9484057497, -90.3256512045



**Photo 23:** SP-23 at  
29.946696263, -90.3248039311



**Photo 24:** SP-24 at  
29.9449009211, -90.3239152047