



July 16, 2025
Sent via Email: 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
2nd 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 March 23rd, 2025 to July 3rd, 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 2nd Quarter yielded Sampling Period Concentration Changes ranging from 0.15 to 9.9 µg/m³. While some individual sampling periods approached or exceeded 9 µg/m³, all results remained within compliance as defined by applicable rolling annual average action levels under 40 C.F.R. 63.658(g). Quarterly averages were calculated once data from six (7) 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 activities during the 2nd Quarter experienced one weather-related delay. On May 21, 2025, thunderstorms prevented sampling; however, all required samples were collected the following day, May 22, 2025, within the acceptable regulatory timeframe. No other sampling delays or issues affecting sample collection occurred during this period. Temperatures during the quarter ranged from a low of 64 °F in April to a high of 93 °F in June. Relative humidity ranged from a minimum of 73% to a maximum of 76% throughout April through June. No changes to monitoring station locations were observed.

Sampling stations SP15 and SP16 showed slightly elevated benzene concentrations during this quarter; however, these values do not exceed the rolling annual average benzene action level of 9 µg/m³ as defined under 40 C.F.R. 63.658(g). While individual 2-week sampling results may occasionally exceed this threshold, corrective action is only required when the rolling annual average

is above the action level. At this time, no formal action is warranted, but these locations will continue to be monitored to track any trends or persistent elevations in future sampling events.

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



Joseph Dupepe, EI
Engineer

Appendix

Attachment 1 – Sampling Period Identification

Attachment 2 – 2nd Quarter Benzene Analytical Results

Attachment 3 – Monitoring Stations Photolog

Attachment 1 – Sampling Period Identification

Attachment 1: 2nd Quarter 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 Δc * ($\mu\text{g}/\text{m}^3$) (\$63.655(h)(8)(iv))	Annual Average Δc * ($\mu\text{g}/\text{m}^3$) (\$63.655(h)(8)(iv))	Comments
1	2025-84	04/09/25	04/23/25	1.17	0.89	Annual Average Δc calculation requires 26 two-week sample periods
1	2025-85	04/23/25	05/06/25	1.46	0.92	Annual Average Δc calculation requires 26 two-week sample periods
1	2025-86	05/07/25	05/22/25	1.22	0.94	Annual Average Δc calculation requires 26 two-week sample periods
1	2025-87	05/22/25	06/05/25	1.13	0.95	Annual Average Δc calculation requires 26 two-week sample periods
1	2025-88	06/05/25	06/19/25	1.27	0.97	Annual Average Δc calculation requires 26 two-week sample periods
1	2025-89	06/19/25	07/03/25	0.87	0.98	Annual Average Δc calculation requires 26 two-week sample periods

Attachment 2 – 2nd Quarter Benzene Analytical Results

Attachment 2: 2nd 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)
2025-84	SP-01	Regular Monitor	0.65	no
2025-84	SP-02	Regular Monitor	0.47	no
2025-84	SP-03	Regular Monitor	0.64	no
2025-84	SP-04	Regular Monitor	0.56	no
2025-84	SP-05	Regular Monitor	0.61	no
2025-84	SP-06	Regular Monitor	0.47	no
2025-84	SP-07	Regular Monitor	0.52	no
2025-84	SP-08	Regular Monitor	0.44	no
2025-84	SP-09	Regular Monitor	0.45	no
2025-84	SP-10	Regular Monitor	0.6	no
2025-84	SP-11	Regular Monitor	0.97	no
2025-84	SP-12	Regular Monitor	1.1	no
2025-84	SP-13	Regular Monitor	1.4	no
2025-84	SP-14	Regular Monitor	1.4	no
2025-84	SP-15	Regular Monitor	2.4	no
2025-84	SP-16	Regular Monitor	6.3	no
2025-84	SP-17	Regular Monitor	2.6	no
2025-84	SP-18	Regular Monitor	1.6	no
2025-84	SP-19	Regular Monitor	1.7	no
2025-84	SP-20	Regular Monitor	0.54	no
2025-84	SP-21	Regular Monitor	0.6	no
2025-84	SP-22	Regular Monitor	0.67	no
2025-84	SP-23	Regular Monitor	0.99	no
2025-84	SP-24	Regular Monitor	0.99	no
2025-84	D-01	Regular Monitor	0.67	no
2025-84	FB-01	Field Blank	0.15	yes
2025-84	D-02	Regular Monitor	0.39	no
2025-84	FB-02	Field Blank	0.15	yes

Attachment 2: 2nd Quarter Benzene Analytical Results

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Sampling Period ID	Sampler Name	Passive Sampler Type	Sampling Period Benzene Concentration (ug/m3)	Below Method Detection Limit (BDL)
2025-85	SP-01	Regular Monitor	0.81	no
2025-85	SP-02	Regular Monitor	0.55	no
2025-85	SP-03	Regular Monitor	0.55	no
2025-85	SP-04	Regular Monitor	0.51	no
2025-85	SP-05	Regular Monitor	0.53	no
2025-85	SP-06	Regular Monitor	0.52	no
2025-85	SP-07	Regular Monitor	0.4	no
2025-85	SP-08	Regular Monitor	0.44	no
2025-85	SP-09	Regular Monitor	0.6	no
2025-85	SP-10	Regular Monitor	0.42	no
2025-85	SP-11	Regular Monitor	1.1	no
2025-85	SP-12	Regular Monitor	1.4	no
2025-85	SP-13	Regular Monitor	1.5	no
2025-85	SP-14	Regular Monitor	1.9	no
2025-85	SP-15	Regular Monitor	3.2	no
2025-85	SP-16	Regular Monitor	8.7	no
2025-85	SP-17	Regular Monitor	4.1	no
2025-85	SP-18	Regular Monitor	2.2	no
2025-85	SP-19	Regular Monitor	1.4	no
2025-85	SP-20	Regular Monitor	0.9	no
2025-85	SP-21	Regular Monitor	1.3	no
2025-85	SP-22	Regular Monitor	1.1	no
2025-85	SP-23	Regular Monitor	0.83	no
2025-85	SP-24	Regular Monitor	1.1	no
2025-85	D-01	Regular Monitor	0.51	no
2025-85	FB-01	Field Blank	0.15	yes
2025-85	D-02	Regular Monitor	0.78	no
2025-85	FB-02	Field Blank	0.15	yes

Attachment 2: 2nd Quarter Benzene Analytical Results

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Sampling Period ID	Sampler Name	Passive Sampler Type	Sampling Period Benzene Concentration (ug/m3)	Below Method Detection Limit (BDL)
2025-86	SP-01	Regular Monitor	0.59	no
2025-86	SP-02	Regular Monitor	0.46	no
2025-86	SP-03	Regular Monitor	0.44	no
2025-86	SP-04	Regular Monitor	0.44	no
2025-86	SP-05	Regular Monitor	0.6	no
2025-86	SP-06	Regular Monitor	0.54	no
2025-86	SP-07	Regular Monitor	0.54	no
2025-86	SP-08	Regular Monitor	0.82	no
2025-86	SP-09	Regular Monitor	0.9	no
2025-86	SP-10	Regular Monitor	1.1	no
2025-86	SP-11	Regular Monitor	0.83	no
2025-86	SP-12	Regular Monitor	1	no
2025-86	SP-13	Regular Monitor	1.1	no
2025-86	SP-14	Regular Monitor	1.7	no
2025-86	SP-15	Regular Monitor	3.7	no
2025-86	SP-16	Regular Monitor	9.9	no
2025-86	SP-17	Regular Monitor	0.73	no
2025-86	SP-18	Regular Monitor	0.67	no
2025-86	SP-19	Regular Monitor	0.68	no
2025-86	SP-20	Regular Monitor	0.49	no
2025-86	SP-21	Regular Monitor	0.53	no
2025-86	SP-22	Regular Monitor	0.63	no
2025-86	SP-23	Regular Monitor	0.6	no
2025-86	SP-24	Regular Monitor	0.81	no
2025-86	D-01	Regular Monitor	0.63	no
2025-86	FB-01	Field Blank	0.14	yes
2025-86	D-02	Regular Monitor	0.86	no
2025-86	FB-02	Field Blank	0.14	yes

Attachment 2: 2nd Quarter Benzene Analytical Results

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Sampling Period ID	Sampler Name	Passive Sampler Type	Sampling Period Benzene Concentration (ug/m3)	Below Method Detection Limit (BDL)
2025-87	SP-01	Regular Monitor	0.52	no
2025-87	SP-02	Regular Monitor	0.57	no
2025-87	SP-03	Regular Monitor	0.61	no
2025-87	SP-04	Regular Monitor	0.59	no
2025-87	SP-05	Regular Monitor	0.65	no
2025-87	SP-06	Regular Monitor	0.59	no
2025-87	SP-07	Regular Monitor	0.51	no
2025-87	SP-08	Regular Monitor	0.62	no
2025-87	SP-09	Regular Monitor	0.76	no
2025-87	SP-10	Regular Monitor	0.77	no
2025-87	SP-11	Regular Monitor	0.89	no
2025-87	SP-12	Regular Monitor	1.6	no
2025-87	SP-13	Regular Monitor	1.1	no
2025-87	SP-14	Regular Monitor	1.6	no
2025-87	SP-15	Regular Monitor	2.7	no
2025-87	SP-16	Regular Monitor	6.2	no
2025-87	SP-17	Regular Monitor	1	no
2025-87	SP-18	Regular Monitor	1.5	no
2025-87	SP-19	Regular Monitor	1.1	no
2025-87	SP-20	Regular Monitor	0.63	no
2025-87	SP-21	Regular Monitor	0.68	no
2025-87	SP-22	Regular Monitor	0.71	no
2025-87	SP-23	Regular Monitor	0.65	no
2025-87	SP-24	Regular Monitor	0.91	no
2025-87	D-01	Regular Monitor	0.68	no
2025-87	FB-01	Field Blank	0.15	yes
2025-87	D-02	Regular Monitor	0.62	no
2025-87	FB-02	Field Blank	0.15	yes

Attachment 2: 2nd Quarter Benzene Analytical Results

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Sampling Period ID	Sampler Name	Passive Sampler Type	Sampling Period Benzene Concentration (ug/m3)	Below Method Detection Limit (BDL)
2025-88	SP-01	Regular Monitor	1.4	no
2025-88	SP-02	Regular Monitor	0.49	no
2025-88	SP-03	Regular Monitor	0.5	no
2025-88	SP-04	Regular Monitor	0.54	no
2025-88	SP-05	Regular Monitor	0.71	no
2025-88	SP-06	Regular Monitor	0.65	no
2025-88	SP-07	Regular Monitor	0.5	no
2025-88	SP-08	Regular Monitor	0.55	no
2025-88	SP-09	Regular Monitor	0.87	no
2025-88	SP-10	Regular Monitor	0.83	no
2025-88	SP-11	Regular Monitor	0.78	no
2025-88	SP-12	Regular Monitor	1.1	no
2025-88	SP-13	Regular Monitor	1.2	no
2025-88	SP-14	Regular Monitor	1.4	no
2025-88	SP-15	Regular Monitor	4	no
2025-88	SP-16	Regular Monitor	8	no
2025-88	SP-17	Regular Monitor	1.2	no
2025-88	SP-18	Regular Monitor	1.1	no
2025-88	SP-19	Regular Monitor	0.74	no
2025-88	SP-20	Regular Monitor	0.44	no
2025-88	SP-21	Regular Monitor	0.45	no
2025-88	SP-22	Regular Monitor	0.7	no
2025-88	SP-23	Regular Monitor	0.67	no
2025-88	SP-24	Regular Monitor	1.2	no
2025-88	D-01	Regular Monitor	1.5	no
2025-88	FB-01	Field Blank	0.15	yes
2025-88	D-02	Regular Monitor	0.67	no
2025-88	FB-02	Field Blank	0.15	yes

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Sampling Period ID	Sampler Name	Passive Sampler Type	Sampling Period Benzene Concentration (ug/m3)	Below Method Detection Limit (BDL)
2025-89	SP-01	Regular Monitor	0.73	no
2025-89	SP-02	Regular Monitor	0.62	no
2025-89	SP-03	Regular Monitor	0.63	no
2025-89	SP-04	Regular Monitor	0.59	no
2025-89	SP-05	Regular Monitor	0.65	no
2025-89	SP-06	Regular Monitor	0.41	no
2025-89	SP-07	Regular Monitor	0.3	no
2025-89	SP-08	Regular Monitor	0.36	no
2025-89	SP-09	Regular Monitor	0.47	no
2025-89	SP-10	Regular Monitor	0.47	no
2025-89	SP-11	Regular Monitor	0.54	no
2025-89	SP-12	Regular Monitor	0.75	no
2025-89	SP-13	Regular Monitor	0.82	no
2025-89	SP-14	Regular Monitor	1	no
2025-89	SP-15	Regular Monitor	2	no
2025-89	SP-16	Regular Monitor	3.5	no
2025-89	SP-17	Regular Monitor	0.81	no
2025-89	SP-18	Regular Monitor	0.89	no
2025-89	SP-19	Regular Monitor	1.1	no
2025-89	SP-20	Regular Monitor	0.73	no
2025-89	SP-21	Regular Monitor	0.98	no
2025-89	SP-22	Regular Monitor	0.83	no
2025-89	SP-23	Regular Monitor	0.66	no
2025-89	SP-24	Regular Monitor	1.2	no
2025-89	D-01	Regular Monitor	0.74	no
2025-89	FB-01	Field Blank	0.15	yes
2025-89	D-02	Regular Monitor	0.38	no
2025-89	FB-02	Field Blank	0.15	yes

Attachment 3 – Monitoring Stations Photolog



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



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



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



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



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



Photo 21: SP-21 at
29.9505393134, -90.3266837564

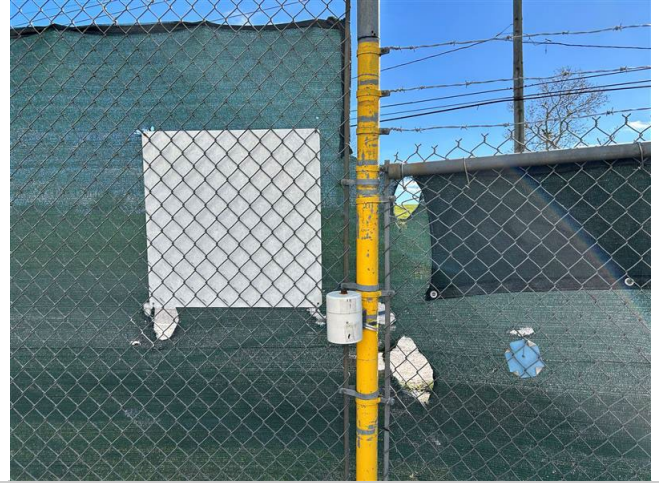


Photo 22: SP-22 at
29.9484057497, -90.3256512045

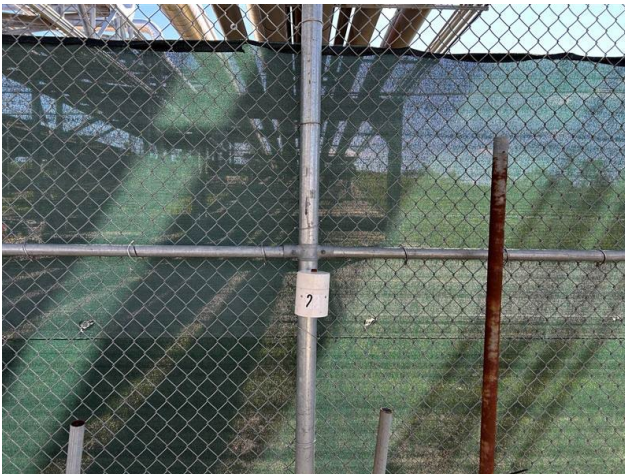


Photo 23: SP-23 at
29.946696263, -90.3248039311



Photo 24: SP-24 at
29.9449009211, -90.3239152047