



BUCKEYE TERMINALS, LLC

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Air Quality Division
Detroit Office

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April 15, 2016

District Supervisor
Michigan DEQ
Air Quality Division
Cadillac Place
3058 West Grand Boulevard
Suite 2-300
Detroit, Michigan 48202

Re: Response to Violation Notice
Detroit Terminal – Permit No.: MI-ROP-B2247-2009
Buckeye Terminals, LLC (Buckeye)
700 South Deacon Street,
Detroit, MI 48217

Dear Mr. Hemben,

Buckeye Terminals, LLC (Buckeye) is in receipt of the Violation letter dated August 28th, 2015 and again December 8th, 2015 regarding the above referenced air permit at the Detroit Terminal. Buckeye would like to offer the following response to the DEQ violations.

Please be aware that the Buckeye HSSE department does not have a record of receiving the two notices that were mailed in 2015. Buckeye understands the importance of the violation letters and will work with operations in the future to ensure that these are communicated to HSSE in a timely fashion.

Violation 1: Buckeye – Detroit installed and operated a vapor combustion unit (VCU) at EULODGING without first obtaining a Permit to Install.

Response: Buckeye was performing maintenance on the permanently installed VRU at the facility and operated a portable VCU during the period of August 1, 2015 to August 12, 2015 (12 days). Prior to this time Buckeye sent a notice to the DEQ that we were applying R 336.1215 Rule 215 (1); operational flexibility for the use of this device. We were informed by the DEQ that this rule did not apply to this operation on August 6, 2016 and a Permit to Install (PTI) application must be submitted. Buckeye submitted the PTI application on August 6th, 2015. The final permit, PTI# 149-15, was issued September 25, 2015. This permit gives the facility the operational flexibility to operate EULODGING during periods of VRU maintenance and will prevent this deviation in the future.

Violation 2: Buckeye- Detroit operated EULODGING while the carbon adsorption vapor recovery unit (VRU) was not operating in a satisfactory manner.

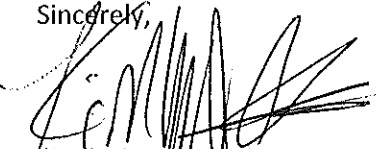
Response: Buckeye operated the EULODGING rack with a portable VCU during the period of downtime on the VRU. The VCU collected all the vapors from EULODGING with the same control efficiencies as the VRU.

[Type text]

Please be aware that

Thank you for your time in this matter. If you have any questions or need additional information, please contact me at 419-993-8003 or at ktrostel@buckeye.com.

Sincerely,



Kimberly J. Trostel
Sr. Specialist, Air Compliance

CC:

B. Crawford

T. Nash

K. Ocheski