DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B224724756

FACILITY: BUCKEYE TERMINALS, LLC-DETROIT TERMINAL		SRN / ID: B2247
LOCATION: 700 S DEACON ST, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Richard Raiders , Compliance Manager		ACTIVITY DATE: 04/01/2014
STAFF: Terseer Hemben	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: VOC		
RESOLVED COMPLAINTS:		

INSPECTED BY Terseer Hemben, MDEQ
PERSONNEL Responsible Dave Vantryon –Senior Operator
FACILITY PHONE NUMBER : (313)-292-4030
FACILITY FAX : (313) - 292-9616
DATES OF INSPECTION : 4/1/2014

FACILITY BACKGROUND: BUCKEYE TERMINALS, LLC. ROP # MI-ROP-B2247-2009

Buckeye Terminals, LLC currently supplies distillate fuel and gasoline to Detroit customers.

COMPLAINT/COMPLIANCE HISTORY:

Buckeye Terminals, LLC (BT, LLC) has not been a source of citizen air quality complaints since the last annual inspection.

OUTSTANDING CONSENT ORDERS:

None

OUTSTANDING LOV'S:

None

OPERATING SCHEDULE:

The facility is capable of operating 24 hours per day, 365 days per year. However, currently, the facility services about 50 trucks per day.

PROCESS DESCRIPTION:

The Buckeye Terminal is a gasoline and distillate fuel oil distribution terminal. Gasoline and distillate are received by pipeline and stored in internal floating roof and fixed roof tanks. Eight storage tanks are designated for either gasoline or distillate service. Gasoline additive is stored in fixed roof tanks. Gasoline and distillate is bottom loaded into tank trucks for distribution to marketing stations. Gasoline additive is metered into gasoline during tank truck loading. There is one tank truck loading rack at the terminal. Vapor hoses and associated piping route vapors displaced from the tank trucks during loading rack at the terminal. Vapor hoses and associated piping route vapors displaced from tank trucks during loading to a carbon adsorption/absorption vapor recovery unit (VRU). The terminal is a major source of VOC emissions and Buckeye Detroit Terminal holds a Title V Renewable Operating Permit # MI-ROP-B2247-2009. The terminal is a minor source of HAPs.

EQUIPMENT AND PROCESS CONTROLS:

The equipment listing submitted by Buckeye is on records. Detroit Terminal indicated storage tanks at the facility had fixed working capacities. The listing included vapor recovery unit that functioned as a control device for reducing volatile organic compounds emissions.

The Vapor Unit Recovery controlled the loading rack. Trucks were loaded only when the VRU turned on automatically indicating status of working in a satisfactory manner. The VRU had an interlocking system that would not allow tankers to load if the vapor line was not connected. This part of loading process was not automatic. Operators were required to check for system leaks manually. After a truck was loaded, the VRU automatically and continuously to drew air through the vapor recovery hose for 30 minutes. Once the 30 minutes time span elapsed, a check valve closed to prevent escape of liquid or vapors into the ambient air. Each loading base was equipped with an overflow detector – Level Control system that shut off product flow when the tanker capacity reached specified level. Trucks that failed to renew their vapor tightness certification were not allowed to load at the terminal. All data acquired at this facility was tracked by a computer located in the building and stored at the central control station. The facility was requested to perform emissions testing on their VRU owing to the options they chose for compliance emissions monitoring via CEMS in 2010. The test results came out in compliance with ROP conditions.

INSPECTION PROCEDURE:

I arrived at the Buckeye Terminal facility, along 700 S. Deacon on April 1, 2014 at 1310 hours. Purpose for the visit was to conduct annual compliance inspection. According to Weather Underground forecast, Temperature at the hour was 62 F with wind speed 30 mph coming from WSW, and humidity 37%. I was received by Mr. Dave Vantryon, the senior Terminal Operator. During the pre-inspection conference, Mr. Vantryon informed all site records relating to site operations would be obtained from the central operating record keeper. Supporting records for site operations were requested for evaluation of compliance with permit conditions. Mr. Vantryon led me on the tour of Loading Rack and the VRU premises. We inspected the loading, testing and mechanical conditions of the tanks and equipment. Loading equipment and accessories looked in good condition and worked satisfactorily. There were Trucks loading at the bay. I observed the efficacy of the vapor recovery unit for vapor collection, and how it was utilized in maintaining the level control system for aiding controls of fill-up level in the vessel. Monitors in the control room facilitated systems control.

Vantryon stated the Vapor Recovery Unit (VRU) was working in good condition. The VRU system was equipped with a sensor that detected and controlled VOC leakage. Any leakage detected in the loading system automatically resulted into a large pressure drop that triggered alarms. The system was then manually shutdown. The above-ground piping connecting the VRU to the tank farm was examined for corrosion. Each of the tanks and associated above-ground piping seemed to be in good condition. We made several trips to the plant and tank farm. We returned to the control room for post inspection conference. I requested for emission and maintenance records of the process. The requested records came in to the AQD office via postal mail o April 15, 2014.

During the inspection of the facility, I examined the premises for presence of open containers that might be holding organic liquids that posed as source for odors. No open containers holding organic liquids were detected. There were no unpleasant odors detected at the facility premises. Summarily, the following records were obtained from Mr. Vantryon:

- VRU maintenance records
- Truck Loading Rack throughput records for the last 1 year
- Terminal loading SOP and rules
- Tanks throughput and maintenance documentation.

Records pertaining to MACT rules requested from the Company's Environmental department were sent in the form of:

- VRU performance records
- Emissions spreadsheets listing VOC monitoring
- Emissions spreadsheets listing HAPs monitoring
- Gasoline seasonal requirements (RVP) listing
- Total storage tank VOC, and throughput spreadsheets
- Total storage tank HAP emissions spreadsheets
- Maintenance records for seals on tanks.

APPLICABLE RULES/ROP #MI-ROP-B2247-2009 CONDITIONS:

The RO Permit Special Conditions were used to evaluate compliance at the facility:

Based on the observations made and review of records during the 2014 annual compliance inspection, AQD staff determines the Buckeye Terminals-Detroit facility in reference to requirements of the RO permit listed to this document met the following requirements:-

1. In compliance – There has not been any modification to the facility FGGASTANKS system in the last 12 months. Response item 1 confirmed the statement (Pg. 2 attached).

2. I compliance - there has not been any modification to the Loading Rack system in the last 1 year. Response item #2 confirms the statement (Pg. 2 #2 attached).

3. In compliance – there has not there been any modification to the Boiler system. The response is same as in # 1, and 2. (Pg. 2. #3 attached). However, the Boiler was out of service!

4. In compliance- Buckeye Terminal Detroit (BTD) provided records indicating the EUTANK 9 holding distillate product emissions were less than 7.53 tpy. Records indicated the emissions were 0.019 tpy. Records are attached (Pg. 1/80 of summary).

Tank 9

5. In compliance - Buckeye demonstrated the VOC emission rate from the EUTANK 9 did not exceed 7.53 tons per year based on a 12 month rolling time period as determined at the end of each calendar month [SC I.1]. Records indicated the emissions were 0.02 tpy [Page 1/80-Emissions Summary].
6. In compliance-Buckeye demonstrated that material limit from EUTANK 9 did not exceed 100,000,000 gallons per year based on a 12 month rolling time period as determined at the end of each calendar month [SC. II.1]. Records indicated material usage was 22,743,133gallions per r year [Throughput, pg. 3/80].
7. In compliance - Buckeye demonstrated the material account from Distillate did not exceed 212,284,800 gal per year based on 12-month rolling time period as determined at the end of each calendar month [S.C. II.2]. Records indicated material account from Distillate was 8,941,413 gallons [pg. 3/80].
8. In compliance- Buckeye demonstrated that any storage vessel holding organic true vapor pressure of more than 1.2 psia, but less than 11 psia, for EUTANK 9 was equipped and maintained with a floating cover or roof which rests upon, and is supported by liquid being contained and has a closure seal or seals to reduce space between cover or the roof edge and the vessel wall, and the seal or seal fabric had no holes, tears, or other non-functional openings [SC IV.1]. Response indicated that no maintenance was conducted for EUTANK 9 within the last 12 months. However, the last annual tank inspection records indicated the Tank was equipped and maintained with a floating cover as listed in Appendix C.
9. In compliance – Buckeye demonstrated that any storage vessel holding organic true vapor pressure of more than 1.2 psia, but less than 11 psia, for EUTANK 9 was equipped and maintained with a recovery system or other control system approved by the department, which recovered not less than 90% by weight, of the uncontrolled organic vapor that would otherwise be emitted into the atmosphere [SC IV.2]. Records indicated Tank 9 was equipped with an IFR, and did not have a recovery system. Comment #7 supported the assessment [pg. 3, Comment #8].
10. In compliance - Buckeye demonstrated all openings except stub drains were equipped with covers, lids, or seals met the following conditions:
    a. The cover, lid, or seal was in the closed position at all times, except when in actual use [SC. IV.3a]. Records indicated that annual visual inspection was conducted satisfactorily (Appendix B]
    b. Automatic bleeder vents were closed at all times, except when the roof was floated off, or landed on, the roof leg supports [SC. IV.3b]. Records indicated the procedure was followed accordingly [Appendix B].
    c. Rim vents, if provided, were set at the manufacture's recommended setting or were set to open when the roof was being floated off the leg supports [SC. IV.3c]. Records indicated the process was conducted in accordance with standard operating procedures [Appendix B].
11. In compliance – Buckeye demonstrated the permittee kept records of monthly and annual throughput of gasoline and /or distillate for EUTANK 9 [SC VI.1]. Records are attached [Appendix A].
12. In compliance - Buckeye demonstrated the permittee conducted an annual inspection through hatches and complete inspection when the EUTANK 9 were emptied and degassed [SC VI.2].

Report stated the EUTANK 9 was not emptied and cleaned during the last 12 months. The last Annual tank Inspection report is attached [Appendix B].

13. In compliance-Buckeye demonstrated the permittee kept records of true maximum vapor pressure of gasoline, psia, as gasoline was stored in EUTANK 9 [SC VI.3]. Records are attached [Appendix A].
14. In compliance - Buckeye did not need to demonstrate permittee promptly reported deviations pursuant to General conditions 21 and 22 of Part A [SC. VII.1]. Records indicated there were no reported deviations in the last 12 months.
15. In compliance- Buckeye demonstrated Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A; and report was postmarked or received by the appropriate AQD's Office by March 15, for reporting period July to December, and September 15 for reporting period January 1 to June 30 [SC. VII.2]. Records indicated the Semiannual reporting of monitoring and deviations were submitted timely as required [Appendix D]
16. In compliance – Buckeye demonstrated the permittee reported annual certification of compliance pursuant to General Conditions 19 and 20 of Part A; the report was postmarked or received by the appropriate AQD's District Office by March 15 for the previous calendar year thereafter [SC. VII.3].Response indicated the annual certification was submitted [Appendix E].

Tank 12

17. In compliance – Buckeye demonstrated the VOC emissions rate from EUTANK 12 did not exceed 11.6 tons per year based on a 12 month rolling time period as determined at the end of each calendar month (S.C. I.1). Records indicated highest emissions were 0.03 tpy [Pg. 1/80-Summary].
18. In compliance - demonstrate that material limit from EUTANK12 did not exceed 163,000,000 gallons per year based on a 12 month rolling time period as determined at the end of each calendar month [SC IV.1]. Records indicated that material throughput was 22,743,133 gallons per year [Appendix A; Pg. 3/80]
19. In compliance - Buckeye demonstrated that any storage vessel holding organic true vapor pressure of more than 1.2 psia, but less than 11 psia, for EUTANK 9 and EUTANK 12 was equipped and maintained with a floating cover or roof which rested upon, and was supported by liquid being contained and had a closure seal or seals to reduce space between cover or the roof edge and the vessel wall, and the seal or seal fabric had no holes, tears, or other non-functional openings [SC IV.1]. Records indicated no maintenance was conducted for EUTANK 12 within the last 12 months. However, the last Annual inspection and in-service tank inspection were conducted [Appendix F and Appendix G].
20. In compliance- Buckeye demonstrated that any storage vessel holding organic true vapor pressure of more than 1.2 psia, but less than 11 psia, for EUTANK 12 was equipped and maintained with a recovery system or other control system approved by the department, which recovered not less than 90% by weight, of the uncontrolled organic vapor that would otherwise be emitted into the atmosphere [SC IV.2]. Records indicated Tank 1 was equipped with an IFR, and did not have a recovery system. [Refer to ccomment#8].
21. In compliance – Buckeye demonstrated all openings except stub drains were equipped with covers, lids, or seals met the following conditions:
    a. The cover, lid, or seal was in the closed position at all times, except when in actual use [SC. IV.3a]. Response is located in Appendix F.
    b. Automatic bleeder vents were closed at all times, except when the roof was floated off, or landed on, the roof leg supports [SC. IV.3b].The SOP is located in Appendix F.
    c. Rim vents, if provided, were set at the manufacture's recommended setting or were set to open when the roof was being floated off the leg supports [SC. IV.3c]. The response was addressed under Appendix F.
22. In compliance - Buckeye demonstrated the permittee kept monthly and annual throughput of gasoline and /or distillate for EUTANK 12 [SC VI.1]. Response indicated records were kept as presented in Appendix A.
23. In compliance - Buckeye demonstrated the permittee verified compliance with parameters in monitoring by conducting an annual inspection through the hatches and complete inspection when the tank was emptied and degassed [SC. VI.2]. Response stated EUTANK 12 was not emptied and cleaned during the last 12 months. Detail annual tank inspection report is located in Appendix F.
24. In compliance - Buckeye demonstrated permittee kept records of true maximum of true vapor pressure of gasoline, psia, as gasoline was stored [SC. VI.3]. Response indicated Buckeye's tank emissions and management system was in compliance as listed in Appendix A.

25. In compliance – Buckeye demonstrated permittee promptly reported deviations pursuant to General Conditions 21 and 22 of Part A [SC. VII.1]. Response indicated there were no reported deviations in the last 12 months.
26. In compliance - Buckeye demonstrated Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A; and report was postmarked or received by the appropriate AQD's Office by March 15, for reporting period July to December, and September 15 for reporting period January 1 to June 30 [SC. VII.2].Response indicated Semiannual reporting of monitoring and deviations were submitted as required. Report was confirmed in MACES log [Appendix D].
27. In compliance - Buckeye demonstrated the permittee reported annual certification of compliance pursuant to General Conditions 19 and 20 of Part A; the report was postmarked or received by the appropriate AQD's District Office by March 15 for the previous calendar year thereafter [SC. VII.3]. Response confirmed as listed in Appendix E.

EULOADING-Loading Racks containing 4 Gasoline & Distillate loading bays

28. In compliance- Buckeye demonstrated the VOC emissions from the EULOADING did not exceed 0.7 lbs. per 1000 gallons of gasoline or distillate loaded based on six-hour period during which at least 300,000 (78,740 gallons) liters were loaded [SC I.1]. Report indicated the VOC emissions were 0.27 lbs. per 1000 gallons based on 193,164 gallons loaded [Appendix A, Pg. 9/80].
29. In compliance – Buckeye demonstrated the permittee did not allow the loading of any organic compound that had true vapor pressure of more than 1.5 psia at actual conditions from any stationary vessel into any delivery vessel located at an existing loading facility which had a throughput of 5,000,000 or more gallons of such compounds per year, unless delivery vessel was filled by a submerged fill pipe (SC III.1). Response indicated all loading processes at the facility were conducted using submerged filled pipes.
30. In compliance – Buckeye demonstrated any delivery vessel located at the gasoline racks was controlled by vapor recovery system that captured all displaced organic vapor and air by means of a vapor tight collection line and recovered all organic vapors such that emissions to the atmosphere did not exceed 0.7 lbs. of organic vapor per 1000 gallons of organic compounds loaded (SC III.2). Response stated the most recent performance stack test report demonstrated compliance with the limit 0.7 lbs. of organic vapor per 1000 gallons of organic compounds loaded. The most recent PM report is attached in Appendix I.
31. In compliance - Buckeye demonstrated that any delivery vessel located at a gasoline loading racks (EULOADING) was equipped, maintained, or controlled with all of the following:
    - An interlocking system or procedure to ensure that the vapor-tight collection line was connected before any organic vapor could be loaded (SC III.3 (a)). Report indicated Buckeye provided a coupling on the vapor recovery hoses that depressed the interlocking system on tanker trucks.
    - A device to ensure that vapor tight collection line was closed upon disconnection so as to prevent the release of organic vapor (SC III.3 (b). Response indicated each vapor hose had a one-way check valve to prevent the release of vapors upon disconnection.
    - A device to accomplish complete drainage before the loading device was disconnected or a device to prevent liquid drainage from the loading device when not in use (SC. III.3(c)). Response indicated each loading arm had a dry-break coupler.
    - Pressure vacuum relief valves that were vapor-tight and set to prevent the emission of displaced organic vapor during the loading of delivery vessel except under emergency conditions (SC III.3 (d)). Response indicated that records located in Appendix J for the Header Pressure Test; and Trailer certification located in Appendix K demonstrated gauge pressure in delivery tank did not exceed 450 mmm of water during product loading.
    - Hatch openings that are kept closed and vapor tight during the loading of the delivery vessel (SC. III.3 (e)). Report indicated the Trailer certification located in Appendix K demonstrated gauge pressure in delivery tank did not exceed 450 mm of water during product loading.
32. In compliance - Buckeye demonstrated the permittee developed written procedures for the operation of all emissions control measures; and the measures were posted in an accessible conspicuous location near the loading device [SC. III.4]. Response indicated as part of the driver training program, all drivers were required to go through these procedures. Copies of the procedures are located in Appendix L.
33. In compliance- Buckeye demonstrated the carbon adsorption unit was installed, maintained, and operated in a satisfactory manner [SCIII.5]. Records indicated the attached stack test located in Appendix H and Quarterly process maintenance (PM) report located in Appendix I demonstrated that the carbon adsorption unit was installed, maintained and operated satisfactorily over the last 12 months.

34. In compliance - Buckeye demonstrated each vapor collection system was designed to prevent any total organic compounds vapor collected at one loading rack from passing to another loading rack [SC IV.1]. Response indicated the tested vapor collection system design performance records were attached in Appendix J.
35. In compliance - Buckeye demonstrated the vapor collection and liquid loading equipment was designed and operated to prevent gauge pressure in delivery tank from exceeding 450 mm of water during product loading [SC IV.2]. Response pointed to records located in Appendix J and Appendix K illustrating Headers Pressure test results, and Trailer Certification records, respectively, demonstrated gauge pressure in delivery tank did not exceed 450 mm of water during product loading.
36. In compliance-Buckeye demonstrated no pressure vacuum-vent in the bulk gasoline terminal's vapor collection system opened at system pressure less than 450 mm of water [SC IV.3]. Response is same as in Item# 35.
37. In compliance - Buckeye demonstrated the facility was equipped, maintained or controlled with a device to accomplish complete drainage before the loading device was connected from any delivery vessel, or a device to prevent liquid drainage from the loading device when not in use [SC IV.4]. Response indicated liquid drainage from the loading device was prevented by the use of Dry-Break Coupler.
38. In compliance - Buckeye demonstrated any delivery vessel located at the facility was equipped, maintained or controlled with pressure Vacuum relief valves that were vapor tight and set to prevent the emission of displaced organic vapor during the loading of the delivery vessel except under emergency conditions [SC IV. 5]. Response indicated pressure vacuum relief valve located on delivery vessels were vapor tight and tightness as documented through Vapor Tightness Truck Certifications [Appendix K].
39. In compliance – Buckeye demonstrated any delivery vessel located at the facility was equipped, maintained or controlled with hatch openings that were kept closed and vapor tight during the loading of the delivery vessel [SC IV.6]. Response indicated Tightness Truck Certification located in Appendix K provided adequate information. Hatch openings on delivery vessels were kept closed and vapor tight during loading.
40. In compliance - Buckeye demonstrated, in each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline was inspected during the loading of gasoline tanks trucks for the organic loading compounds liquid or vapor leaks. (Note that detection methods such as sight, sound or smell were acceptable) [SC. V.1]. Response indicated inspection of the handling of gasoline during loading was performed using the LDAR form found in BEST as located in Appendix M.
41. In compliance - Buckeye demonstrated the permittee verified VOC emission rates from EULOADING by testing at owner's expense in accordance with EPA reference Test Method 25 as required at AQD Supervisor's request; stack testing procedures and location of stack testing ports were in accordance with the applicable federal reference methods 40 CFR Part 60 Appendix A, and no less than 30 days prior to testing, a complete stack test plan was submitted to the AQD; the final plan was approved by AQD prior to testing, and finally, verification of emission rates included the submittal of a complete test results to the AQD within 60 days following the last date of the test [SC. V.2]. Response indicated VOC emission rates were verified through stack tests and found to be in compliance with applicable federal regulations. Results are located in Appendix H.
42. In compliance – Buckeye demonstrated the permittee did not operate EULOADING unless the VRU CEMS was installed and operating properly, and records of VRU operating log were kept for all times that gasoline was loaded [SC. VI.1]. Response indicated the PM located in Appendix I, and GD GACT reports located in Appendix N demonstrated compliance with the condition.
43. In compliance – Buckeye demonstrated on a quarterly basis the permittee verified compliance with Rule 336.1609(3). Response indicated the attached PM located in Appendix I, and GD GACT reported in Appendix N demonstrated compliance with rule 336.1609(3).
44. In compliance - Buckeye demonstrated permittee recorded detection of each leak, and source of the leak was repaired as soon as practicable, but no later than fifteen calendar days after the leak was detected [SC. VI.3]. Response indicated inspection records and leak records provided in the LDAR Log Form of Appendix M explained details of compliance.
45. In compliance – Buckeye demonstrated the permittee kept record of each monthly leak inspection record required under 40 CFR 60.5021(i), and the leak records included as minimum, the following: Response indicated the response was same as in Item #44.
46. In compliance – Buckeye demonstrated the Date of inspection [SC. VI.4a]. Response indicated the information is located in Appendix M.

47. In compliance – Buckeye demonstrated that no leaks were discovered, or location, nature, and severity of each leak was omitted [SC. VI.4b]. Response provided details as in Item # 46.
48. In compliance – Buckeye demonstrated that leak determination method was provided in detail {SC. VI.4c]. Response was same as in Item# 47.
49. In compliance- Buckeye demonstrated corrective action (date each leak repaired, reasons for any repair interval in excess of 15 days) were applied [SC. VI.4d]. Response indicated details were located in Appendix M.
50. In compliance – Buckeye verified the Inspector name and signature for inspection jobs [SC. VI.4e]. The information is located in Appendix M.
51. In compliance - Buckeye demonstrated permittee kept records of all replacements or additions of components performed on an existing vapor processing system [SC. VI.5]. Records of all replacements or additions of components performed on existing vapor processing system were documented through PMs and Work Orders as indicated in Appendix I.
52. In compliance- Buckeye demonstrated permittee promptly reported deviations pursuant to General Conditions 21 and 22 of Part A [SC. VII.1]. Response stated there were no deviations reported in the last 12 months.
53. In compliance - Buckeye demonstrated Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A; and report was postmarked or received by the appropriate AQD's Office by March 15, for reporting period July to December, and September 15 for reporting period January 1 to June 30 [SC. VII.2]. Response indicated Semiannual reporting of monitoring and deviation were submitted as listed in Appendix D.
54. In compliance - Buckeye demonstrated the permittee reported annual certification of compliance pursuant to General Conditions 19 and 20 of Part A; the report was postmarked or received by the appropriate AQD's District Office by March 15 for the previous calendar year thereafter [SC. VII.3]. Response indicated reporting of annual certification of compliance was submitted as listed in Appendix E.
55. In compliance - Buckeye demonstrated that permittee complied with all applicable requirements of 40 CFR 60, Subpart XX [SC. IX.1]. Response indicated compliance with all applicable requirements of 40 CFR 60; Subpart xx was documented in the Appendix H through K.

EUAIRSTRIPPER

56. In compliance – Buckeye demonstrated VOC emissions for EUAIRSTRIPPER did not exceed 0.52 lbs. per hour based on hourly operating scenario [SC. I.1]. Response indicated tank emissions and management was 0.00 lbs. per hour [Appendix A, Pg. 1/80-Remediation].
57. In compliance – Buckeye demonstrated the EUSTRIPPER did not exceed 2.2 tons per year based on annual operating scenario [SC I.2]. Records indicated the emissions were 0.001 tpy throughput.
58. In compliance – Buckeye demonstrated the Benzene emissions from EUAIRSTRIPPER did not exceed 0.02 lbs. /hour based on hourly operating scenario [SC I.3]. Records indicate Benzene emissions were 0.00 lbs. /per [Appendix A; Pg. 1/80].
59. In compliance - Buckeye demonstrated the Benzene emissions from EUAIRSTRIPPER did not exceed 175 lbs. per year based on annual operating scenario (SC 1.4). Records indicated Benzene emissions were 0 tpy [Appendix A; Pg. 1/80].
60. In compliance – Buckeye demonstrated the material limit on Water flow rate for EUAIRSTRIPPER did not exceed 2.8 gallons per minute based on Instantaneous operating scenario [SC II.1]. Records indicated the flow rate was 0 gallons per minute on instantaneous basis [Appendix A].
61. In compliance - Buckeye demonstrated the pemittee verified VOC and Benzene emission rates from the EUAIRSTRIPPER on annual basis by testing at owner's expense; a plan for testing was submitted to the AQD in no less than 30 days for approval before test date; and completed test was reported to the AQD within 60 days of test protocol (SC V.1). The documentation relating to the condition was submitted [Appendix O].
62. In compliance-Buckeye demonstrated that permittee monitored and kept records of influent feed rate to AIRSTRIPPER on a daily basis (SC VI.1). Records are located in Appendix A.
63. In compliance - Buckeye demonstrated that permittee calculated the VOC and benzene emission rates from the AIRSTRIPPER on a daily basis as specified in Appendix 7 (C VI.2). Records are located in Appendix A.
64. In compliance - Buckeye demonstrated permittee promptly reported deviations pursuant to General Conditions 21 and 22 of Part A [SC. VII.1]. Response indicated there were no reported deviations in the last 12 months.
65. In compliance - Buckeye demonstrated Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A; and report was postmarked or received by the appropriate AQD's Office by March 15, for reporting period July to December, and September 15

for reporting period January 1 to June 30 [SC. VII.2]. Semiannual reporting of monitoring and deviations were submitted as listed in Appendix D.

66. In compliance – Buckeye demonstrated the permittee reported annual certification of compliance pursuant to General Conditions 19 and 20 of Part A; the report was postmarked or received by the appropriate AQD's District Office by March 15 for the previous calendar year thereafter [SC. VII.3]. Reporting of annual certification of compliance was submitted as listed in Appendix E.
67. In compliance- Buckeye demonstrated the exhaust gases from stacks SV007 were discharged unobstructed vertically upwards to the ambient air [SC. VIII.1]. Response indicated the exhaust gases from stacks SV007werre discharged unobstructed vertically to the ambient air.

EUBOILER

68. In compliance- Buckeye did not need to demonstrate the SO2 emissions in exhaust gas from the EUBOILER did not exceed 120 ppm by volume based on instantaneous operating scenario (SC I.1). The EUBOILER was out of service.
69. In compliance- Buckeye did not need to demonstrate the material limit on Boiler fuel oil sulfur content did not exceed 0.3 percent by weight based on instantaneous operating scenario (SC II.1). The EUBOILER was out of service.
70. In compliance – Buckeye did not need to demonstrate permittee maintained records of fuel oil :
    a. Sulfur content analysis (SC V.1a). The EUBOILER was out of service.
    b. API gravity using the ASTM Method or an equivalent method [SC. V.1b]. The EUBOILER was out of service.
71. In compliance – Buckeye did not need to demonstrate if permittee opted to use vendor's certification for fuel oil sulfur content instead of analysis [SC. V.2]. The EUBOILER was out of service.
72. In compliance – Buckeye did not need to demonstrate for each fuel shipment, the permittee maintained a record of the sulfur content and API gravity [SC. VI.1]. The EUBOILER was out of service.
73. In compliance – Buckeye did not need to demonstrate permittee promptly reported deviations pursuant to General Conditions 21 and 22 of Part A [SC. VII.1]. The EUBOILER was out of service.
74. In compliance –Buckeye did not need to demonstrate Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A; and report was postmarked or received by the appropriate AQD's Office by March 15, for reporting period July to December, and September 15 for reporting period January 1 to June 30 [SC. VII.2]. The EUBOILER was out of service.
75. In compliance – Buckeye did not need to demonstrate the permittee reported annual certification of compliance pursuant to General Conditions 19 and 20 of Part A; the report was postmarked or received by the appropriate AQD's District Office by March 15 for the previous calendar year thereafter [SC. VII.3]. The EUBOILER was out of service.

FGGASTANKS

76. In compliance – Buckeye demonstrated permittee did not store any organic compounds in FGGASOLINETKS with a true vapor pressure equal to or greater than 11 psia at actual storage conditions [SC. III.1]. A report from Buckeye tank emissions and management system attached in Appendix A confirmed compliance.
77. In compliance - Buckeye demonstrated the vessels were maintained with a floating cover or roof which rested upon, and were supported by the liquid being contained and had a closure seal or seals to reduce the space between the cover or roof edge and the vessel wall; and the seal or seal fabric had no visible holes, tears, or other non-functional openings [SC. IV.1]. Annual visual inspection report confirming compliance is located in Appendix P.
78. In compliance – Buckeye demonstrated all openings, except stub drains were equipped with covers, lids or seals such that the following conditions were met:
    a. The cover, lid or seal was in the closed position at all times, except when in actual use [SC. IV.2a]. Compliance was confirmed in Appendix P.
    b. Automatic bleeder vents were closed at all times, except when the roof was floated off [SC. IV.2b]. Compliance was confirmed in Appendix P.
    c. Rim vents, if provided were set at the manufacturer's recommended setting or were set to open when the roof was being floated off the leg supports [SC. IV.2c].
79. In compliance – Buckeye demonstrated the permittee performed annual inspection through the hatches and completed inspection when the tank was emptied and degassed [SC. VI.1]. Compliance was confirmed in Appendix P.

80. In compliance – Buckeye demonstrated permittee promptly reported deviations pursuant to General Conditions 21 and 22 of Part A [SC. VII.1]. Buckeye stated no deviations were noted in the last 12 months.
81. In compliance -Buckeye demonstrated Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A; and report was postmarked or received by the appropriate AQD's Office by March 15, for reporting period July to December, and September 15 for reporting period January 1 to June 30 [SC. VII.2]. Semiannual reporting of monitoring and deviations were submitted as listed in Appendix D.
82. In compliance - Buckeye demonstrated the permittee reported annual certification of compliance pursuant to General Conditions 19 and 20 of Part A; the report was postmarked or received by the appropriate AQD's District Office by March 15 for the previous calendar year thereafter [SC. VII.3]. Reporting of annual certification of compliance was submitted as listed in Appendix E.

Inspection Areas of Focus: Emission units:

1. Storage Tanks
   The storage tank farm was inspected. There were no standing containers left open with liquid. There were no unusual odors in the Tank farm. The residential Geese seemed happy are aggressively protective of their habitat.
2. Piping and loading racks.
   The piping and loading racks looked in clean and strong structural appearance. There were no corrosive wear on the piping. The valves and pumps carried integrity at visual inspection.

MAERS 2013
The MAERS 2013 was reviewed and audited. The facility passed the audit.

Determination
Based on the 2014 annual inspection and MAERS review, Buckeye Terminal, Detroit was found to have operated satisfactorily through the 2013 period. The facility's emissions were below limits. Buckeye was determined to have operated in compliance with the ROP conditions and requirements.

NAME _____ DATE 5/12/2014 SUPERVISOR W. M.