

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

B438054224

FACILITY: Buckeye Terminals, LLC		SRN / ID: B4380
LOCATION: 6777 BROOKLYN RD, NAPOLEON		DISTRICT: Jackson
CITY: NAPOLEON		COUNTY: JACKSON
CONTACT: Edwin Barbour , Terminal Operator		ACTIVITY DATE: 07/15/2020
STAFF: Stephanie Weems	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Onsite PCE inspection as part of FY20 FCE.		
RESOLVED COMPLAINTS:		

### Scheduled Partial Compliance Inspection (PCE) and Full Compliance Evaluation (FCE) of Buckeye Terminals, LLC (B4380)

#### Facility Contacts:

Jordan Wahl – Terminal Operator  
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Edwin Barbour – Terminal Operator  
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#### Purpose

On July 15, 2020 I conducted an announced compliance inspection of Buckeye Terminals, LLC located at 6777 Brooklyn Rd. Napoleon, MI. The inspection was announced due to the precautions being taken during the COVID-19 pandemic. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules and Opt-out Permit to Install (PTI) 437-93C.

#### Facility Location

The facility is located in Napoleon Township. It is immediately surrounded by commercial and industrial operations, as well as agricultural fields. See Image 1 for an aerial photo.

#### Facility Background

PTI 437-93C was approved for this facility on June 6, 2017.

A Full Compliance Evaluation (FCE) and Inspection (PCE) was conducted June 14, 2016 by AQD staff. At that time, the facility was found to be in compliance.

Additionally, a brief tour/inspection was conducted on March 8, 2017. At that time, AQD field staff pointed out their compliance concerns to Buckeye Terminals and to AQD permit staff in charge of issuing PTI 437-93C. It appears that these issues were addressed in the permit application review process.

This Buckeye Terminal facility is a petroleum bulk terminal. The facility has many storage tanks consisting of both fixed roof and floating roof tanks.

Typically, one or two operators are onsite during business hours, and one must be on call at night to respond quickly in case of an emergency. This terminal is a 24/7 automated facility. This means that tanker trucks can pick up/drop off products at any time using keycard access. A keycard is granted by Buckeye after each driver completes specified training and demonstrates proper certification, as specified in the permit.

#### Regulatory Applicability

##### Active Permits:

Opt-Out Permit PTI 437-93C for the following emission units:

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Flexible Group ID
EULOADRACK	Truck loading rack with permanent vapor recovery unit (VRU) and portable vapor combustion unit (PVCU). The PVCU is located southwest of the truck loading rack.	FGFACILITY
EUTANK1	1.5 million gallon external floating roof storage tank, installed in 1953. The tank was retrofitted with a snow cover, converting it to an internal floating roof tank.	FGIFRTANKS
EUTANK2	840,000 gallon external floating roof storage tank, installed in 1953. The tank was retrofitted with a snow cover, converting it to an internal floating roof tank.	FGIFRTANKS
EUTANK3	1.5 million gallon vertical fixed roof tank, installed in 1953.	FGFIXEDROOFTANKS
EUTANK4	1.8 million gallon vertical fixed roof tank, installed in 1953.	FGFIXEDROOFTANKS
EUTANK5	100,000 gallon vertical fixed roof tank, installed in 1953.	FGFIXEDROOFTANKS
EUTANK6	420,000 gallon vertical fixed roof tank, installed in 1967.	FGFIXEDROOFTANKS
EUTANK7	840,000 gallon internal floating roof tank, installed in 1979.	FGIFRTANKS
EUTANK21	420,000 gallon internal floating roof tank for gasoline, ethanol, or distillate.	FGIFRTANKS

#### MAERS:

The facility reported 11.55 tons of VOC emissions for 2019.

This facility is subject to the following federal regulations:

- 40 CFR Part 60, Subpart A – General Provisions
- 40 CFR Part 60, Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984. (Note: Only EUTANK7 is subject to this subpart)
- 40 CFR Part 60, Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (Note: Only EUTANK21 is subject to this subpart).
- 40 CFR Part 60, Subpart XX – Standards of Performance for Bulk Gasoline Terminals
- 40 CFR Part 63, Subpart BBBBBB – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

Though EGLE does not have delegation over the NESHAP – Subpart BBBBBB, compliance reports submitted by the company indicate that they are maintaining compliance with this subpart.

Furthermore, it appears that Buckeye Terminals operates multiple tanks under PTI exemption rules. As understood from previous inspection reports, Tank 10 is operated under Rule 290, and tanks 8, 9, 14, 17, 18, 19, and 20 are operated under Rule 284(2)(i).

#### Arrival & Facility Contact

No visible emissions or odors were observed upon my approach to the facility. I arrived at approximately 9:45 AM, proceeded to the facility office to see with the terminal operators, provided my identification, and met with Ed and Jordan, the terminal operators.

NOTE: To gain access to the facility, a phone call must be made to the terminal operator for them to open the gate. Entrance will be granted through the truck exit gate.

A pre-inspection discussion was held with Ed. I informed him of my intent to conduct a facility inspection and to review the various records as necessary. He extended his full cooperation during the inspection, accompanied me during the full duration of the inspection, and fully addressed my questions.

### **Pre-Inspection Meeting**

I began by explaining to Ed what processes I would like to see at the facility. We discussed that the facility's records were already provided by Kim Trostel, so this would be strictly an inspection of the on-site processes.

The facility has 2 employees, Ed and Jordan. Their normal work hours span from 6:00 AM to 4:00 PM with additional hours put in for emergencies or loads outside of normal working hours.

**Ed began by showing me the overview board that shows the layout of the facility (see Image 2 attached). We went over the safety procedures and the emergency muster information. Ed also asked me a few health screening questions as it pertains to the current COVID-19 pandemic.**

**I then inquired whether there had been any changes at the facility since issuance of the most recent permit. Ed explained that no changes had occurred.**

### **Onsite Inspection**

Steel-toed boots, safety glasses, and a hard hat are required for the inspection. Additionally, masks/facial coverings were worn by all, as is currently mandated for health reasons related to COVID-19.

### **EULOADRACK**

Consists of 2 bays controlled by a portable vapor combustion unit (PVCU).

Due to dangers associated with the load rack and the need to be fitted with a fire-resistant jumpsuit, we did not go under the load rack. We were, however, able to see from a distance the vapor hoses that are used at the rack to ensure proper vapor collection. Procedures for the operation of control measures required by Rule 609 continue to remain posted near the loading device as required by the permit, and they were able to be seen during our walk around the outside of the loading rack.

Ed confirmed that LDAR checks relying on sight, smell, and sound are conducted daily. He also explained that Buckeye relies on US EPA Test Method 27 truck certifications to ensure that the delivery vessels are equipped with pressure-vacuum relief valves that are vapor tight and set to prevent the emission of displaced organic vapor during the loading of the delivery vessel, except under emergency conditions, as required by their permit. Each tanker truck is Method 27 certified annually and Buckeye receives each certification and files onsite. Furthermore, Buckeye's internal computer system keeps track of Method 27 certifications and will block access to trucks that do not have the required certification.

Ed explained how the vapors are combusted in the PVCU, and we were able to observe the PVCU in operation. The control device appeared to be well maintained and operating within normal operating parameters. The stack appeared to meet the dimensions requirements outlined in the permit.

**FGIFRTANKS-** Consisting of 4 internal floating-roof storage tanks (EUTANK1, EUTANK2, EUTANK7, and EUTANK21) and **FGFIXEDROOFTANKS** -Consisting of 4 fixed-roof storage tanks (EUTANK3, EUTANK4, EUTANK5, and EUTANK6). These tanks are all equipped with conservation vents.

A tour of the tank field was conducted. The field was very neat and well maintained. Ed pointed out the different tanks and explained what each tank holds. Each tank was well-labeled with the tank number and what is held in the tank.

Ed explained how the regular and premium gasoline, #2 diesel, and the #1 diesel (kerosene) are received via a pipeline directly from a refinery. Denatured ethanol and other fuel additives (distillates) are delivered to the site by tanker trucks and stored in the tanks onsite. While we were walking the tank field, Ed pointed out a tanker truck in the distance that was delivering the ethanol to be stored in Tank 21.

As noted during the record review that can be found filed on 5/26/2020, the yearly and 10-year required inspections for EUTANK21 were completed and documented as required by 40 CFR Part 60, Subpart Kb. Additionally, as stated above, though EGLE does not have delegation over the NESHAP – 40 CFR Part 63,

Subpart BBBBBB, Buckeye has been submitting the required notifications, and it appears they are in compliance with this regulation.

### **FGFACILITY**

Consisting of all process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

As stated above, it is understood from previous inspection reports that Tank 10 is operated under Rule 290, and tanks 8,9, 14, 17, 18, 19, and 20 are operated under Rule 284(2)(i). These tanks are used to store the additives. Ed explained that these additives are added to the specified fuel as the fuel is pumped to the tanker truck in the loading rack. He explained that the computer system is designed to add the additive into the fuel based upon the number of gallons that are being pumped to the load rack.

Overall, the facility appeared well-kept and maintained. No odors, leaks, or spills were observed at any point during the inspection.

### **Post-Inspection Meeting**

I held a brief post-inspection meeting with Ed. I explained that there didn't appear to be any compliance concerns and that a report of this inspection would be sent to him after being reviewed by my supervisor.

I thanked Ed for his time and cooperation, and I departed the facility around 10:40 AM.

### **Recordkeeping Request and Review**

The recordkeeping request and subsequent review was completed before the onsite portion of the inspection occurred. The report for this review can be found in the facility files, dated 5/26/2020.

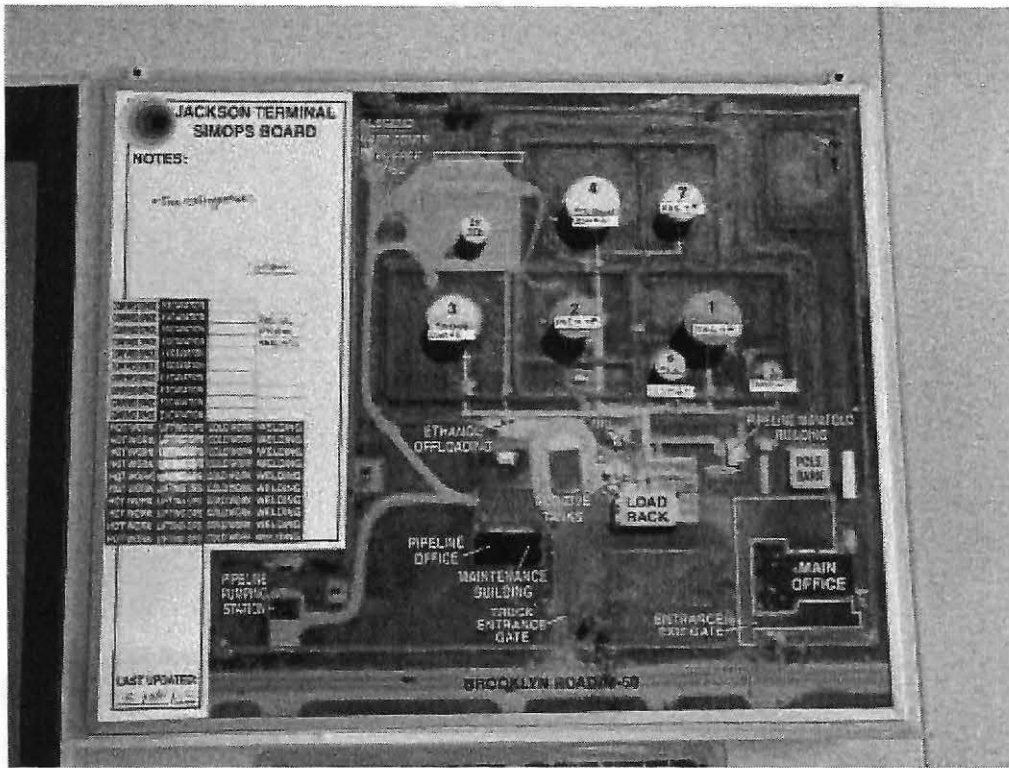
During this review it was noted that the records appear to show compliance with the applicable rules, regulations, and permit conditions.

### **Compliance Summary**

Based upon the facility inspection, review of the records, and review of applicable requirements it appears that this facility is in compliance at the time of this inspection.



**Image 1(1)** : Aerial view.



**Image 2(2) :** Facility layout

NAME Stan Allen

DATE 8-19-2020

SUPERVISOR su