

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

B625835793

FACILITY: Citgo Petroleum Corp		SRN / ID: B6258
LOCATION: 524 THIRD ST, FERRYSBURG		DISTRICT: Grand Rapids
CITY: FERRYSBURG		COUNTY: OTTAWA
CONTACT: Bill Stein , Terminal Manager		ACTIVITY DATE: 08/02/2016
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: The purpose of this inspection was to determine compliance with PTI No. 201-03 and all other applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

On Tuesday August 2, 2016 AQD staff Kaitlyn DeVries (KD) conducted an unannounced, scheduled inspection of Citgo Petroleum Corporation located at 524 Third Street, Ferrysburg, MI. The purpose of this inspection was to determine compliance with PTI No. 201-03 and all other applicable Air Quality Rules and Regulations. KD arrived on site at approximately 9:50 am and met with Mr. Bill Stein, Terminal Manager. KD presented Mr. Stein with the Environmental Rights and Responsibilities pamphlet, which was briefly discussed. KD asked about any modifications or new pieces of equipment at the terminal, and Mr. Stein stated they had not made any modifications since the last time AQD was out in 2013. At the time of the inspection, Citgo Petroleum Corporation (Citgo) was not receiving any product via the pipeline. They were set to receive product later that day. Additionally, no odors or opacity was observed while touring the facility.

Facility Description

Citgo is a fuel distribution facility that obtains product via pipeline in cycles. As previously stated, Citgo was not receiving product at the time of the inspection, but was set to receive it later that day. The facility also obtains product, such as ethanol, via tanker trucks. The terminal is a three (3) bay terminal, but only dispenses product out of two (2). The third bay is dedicated for receiving product.

Regularity Analysis

Citgo currently holds one (1) permit, PTI No. 201-03. Citgo is also subject to several federal regulations including 40 CFR Part 60 Subpart XX for Bulk Gasoline Terminals, 40 CFR Part 60 Subpart Ka and Kb for Storage Vessels for Petroleum Liquids, 40 CFR Part 63 Subpart BBBB for Gasoline Distribution Bulk Terminals and 40 CFR Part 63 Subpart CCCCC for Gasoline Dispensing Facilities. Michigan, however, is not currently delegated for Subparts BBBB and CCCCC, thus they will not be further reviewed. Many of the conditions for Subparts Ka, Kb, and XX are written directly into the permit and will be evaluated as such.

Compliance Evaluation

EU-RACK

This emission unit covers the terminal loading rack, which is controlled by a vapor combustion unit (VCU). Ethanol, gasoline, and diesel throughputs are limited to 36,515,000 gallons per year, 335,000,000 gallons per year, and 62,256,000 gallons per year. As of July 2016 the throughputs were 11,913,888 gallons, 107,811,739 gallons, and 27,924,201 gallons, respectively. Emissions through the VCU also have limits. Ethanol through the VCU is limited to 2 tons per year (tpy), Diesel through the VCU is limited to 2.0 tpy, and gasoline through the VCU is limited to 14.0 tpy. As of July 2016 the emissions through the VCU were 0.4 tons, 9.8 tons, and 0.5 tons. VOC through the VCU is limited to 10 mg/L of gasoline loaded based on test protocol. The last testing was conducted in 2013, and the result was 5.69 mg/L gasoline loaded. The recordkeeping for emissions and throughput appear to be adequate (see attached).

The loading rack appears to be compliant with the provisions of Rules 609, 627, and 706 as well as NSPS XX. The terminal has daily terminal checklists (attached) that fulfill many of these requirements. Citgo also maintains their Malfunction Abatement Plan (MAP) and has spare parts on hand. They are also properly tracking any maintenance and repairs. Per Mr. Stein, the facility has vapor tight collection lines and will not fill trucks that do not have the appropriate documentation of having the proper safeguards. Leak tests are also done once per year for each delivery vessel. Monthly leak inspection reports can be found attached to this report.

While the stack dimensions for the VCU were not explicitly measured, it appeared to be accurate, and there

have been no changes to it.

FG-IFRTANKS

This flexible group covers EU-TANK1, EU-TANK2, EU-TANK3, and EU-TANK4. Tanks 2, 3, and 4 were built in 1958 and are not subject to rule 201 based on the installation/modification date but are in this flexible group to limit the facility wide emissions. EU-TANK1 contains unleaded gas, EU-TANK2 contains ultra-low sulfur diesel, EU-TANK3 contains subgrade unleaded, and EU-TANK4 contains premium gas. All of the tanks are bolted, vapor and rim mounted tanks with internal floating roofs.

Throughput for gasoline is limited to 335,000,000 gallons, and distillate is limited to 662,256,000 gallons. As of July 2016 the throughputs were 107,811,739 gallons and 27,924,201 gallons, respectively. Emissions from these tanks are also limited to 15.4 tpy VOC. As of July 2016, the emissions were 12.82 tons. All throughput and emissions records appear to be adequate (see attached). The tanks are loaded via pipeline and appear to be compliant with all provisions in Rules 604, 704, and 607. EU-TANK1 is also compliant with the provisions in 40 CFR Part 60 Subpart Ka.

FG-ETHANOL

This flexible group covers EU-TANK11, EU-TANK12, and EU-TANK13. All three (3) tanks are 30,000 gallon fixed roof storage tanks. KD noted some black mildew on two (2) of the three (3) tanks. This is a common issue when storing ethanol. The throughput for these tanks is limited to 36,515,000 gallons 12-month rolling. As of July 2016 the throughput was 23,827,776 gallons. Emissions are limited to 9 tpy of ethanol, 12-month rolling. AS of July 2016 emissions were 6,081 lbs (3.04 tons). All recordkeeping for these three tanks appears to be adequate and in accordance with 40 CFR Part 60 Subpart Kb.

EU-AIRSTRIP

The remediation on site is taken care of by Lakeshore Environmental, and is almost complete. No remediation equipment with air emissions is being used at this time, thus this emission unit will not be further evaluated.

FG-FACILITY

The terminal has a site wide VOC emission limit of 57 tpy, and as of July 2016 the 12-month rolling VOC emissions were 54,955 lbs (27.50 tons). Additionally, aggregate HAP's are limited to 22.5 tpy and individually to 9 tpy. As of July 2016 the 12-month rolling aggregate HAP emissions were 821 lbs (0.41) tons. Additionally, the emissions reported for the inspection are consistent with what was reported for the 2015 MAERS report.

The terminal has throughput limits of 335,000,000 gallons of gasoline, 662,256,000 gallons of distillate, and 36,515,000 gallons of ethanol all per 12-month rolling. As of July 2016 respective throughputs were 215,623,478 gallons of gasoline, 55,848,402 gallons of distillate, and 23,827,776 gallons of ethanol.

All emission and throughput data appears to be kept in a satisfactory manner.

Compliance Determination

Based on the observations made during the inspection and a subsequent review of the records, it appears as if Citgo Petroleum Corporation is in compliance with PTI no. 201-03 and all applicable air quality rules and regulations.

NAME

Kaitlyn O'Brien

DATE

8/8/16

SUPERVISOR

[Signature]