

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

B625854613

<b>FACILITY:</b> Citgo Petroleum Corp		<b>SRN / ID:</b> B6258
<b>LOCATION:</b> 524 THIRD ST, FERRYSBURG		<b>DISTRICT:</b> Grand Rapids
<b>CITY:</b> FERRYSBURG		<b>COUNTY:</b> OTTAWA
<b>CONTACT:</b> James La Porte , EHS&S Manager		<b>ACTIVITY DATE:</b> 08/17/2020
<b>STAFF:</b> Chris Robinson	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> FY '20 on-site inspection to determine the facility's compliance status with applicable air quality rules and regulations including PTI no. 201-03A.		
<b>RESOLVED COMPLAINTS:</b>		

On August 17, 2020, Chris Robinson (CR) from the Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) met with James La Porte, EHS&S Manager, Michael Humphreys, Terminal Manager, and Craig Middleton, Assistant Terminal Manager of Citgo Petroleum Corporation (SRN B6258) in Ferrysburg, Ottawa County, Michigan. Per recent field work guidance this inspection was scheduled in advance to ensure proper staff would be onsite as well as to prepare for any Covid19 related entry procedures. Proper PPE and social distancing were maintained throughout the inspection.

Records were requested, provided and reviewed in June 2020. Based on those records the facility appeared to be operating in compliance with the recordkeeping, emission limits, and material limits specified in Permit to Install (PTI) No. 201-03A (SEE ACTIVITY REPORT AC\_B625853847).

#### **Facility Description**

Citgo is a fuel distribution facility that obtains product via pipeline in cycles and other products 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.

#### **Compliance Evaluation**

Citgo operates the following equipment under Opt-out PTI No. 201-03A.

<b>Emission Unit ID</b>	<b>Emission Unit Description (Including Process Equipment &amp; Control Device(s))</b>	<b>Installation Date/Modification Date</b>
EU-RACK	2 lane terminal truck loading rack (2 lanes installed in 1958 and One installed in 1995).	1958 1995
EU-TANK1	2,310,000-gallon storage tank to store distillate (diesel fuel). Internal floating roof installed in 1982.	1958/1982
EU-TANK2	1,470,000-gallon internal floating roof storage tank.	1958
EU-TANK3	2,310,000-gallon internal floating roof storage tank.	1958
EU-TANK4	1,470,000-gallon internal floating roof storage tank.	1958
EU-TANK5	588,000-gallon gasoline/distillate internal floating roof storage tank.	Not Installed
EU-TANK11	30,000-gallon fixed roof ethanol storage tank.	NA
EU-TANK12	30,000-gallon fixed roof ethanol storage tank.	NA
EU-TANK13	30,000-gallon fixed roof ethanol storage tank.	NA

Since EU-TANK1 was modified in 1995 to add a floating roof and its capacity is greater than 20,000 gallons, this tank is subject to 40 CFR Part 60, Subpart Kb for Standard of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which construction, reconstruction, or modification commenced after July 23, 1984. Tank 5 will also be subject once/if constructed. The remaining tanks were constructed before 1978 (1958) which is the applicability data for Subpart Ka, therefore these tanks are not subject to Subparts Ka or Kb unless modified.

Emission unit EU-Rack consists of three lanes. Two installed in 1958 and the third installed in 1995. Michigan Rule 609/706 apply to existing/new loading delivery vessels with organic compounds having true vapor pressure of more than 1.5 psia at existing/new loading facilities handling 5,000,000 or more gallons of such compounds per year". Rule 609 applies to units installed prior to July 1, 1980 and Rule 706 applies to units installed after July 1, 1979. Therefore EU-RACK is subject to both Michigan Rules 609 and 706. Michigan Rule 627 applies, however this requires delivery vehicles to have a submerged pipe. No delivery vehicles were inspected.

Citgo is also subject to 40 CFR Part 60 Subpart XX for Bulk gasoline terminals, 40 CFR Part 63 Subpart BBBBBB for Gasoline Distribution Bulk Terminals and 40 CFR Part 63 Subpart CCCCCC for Gasoline Dispensing Facilities. Michigan does not have delegation of 40 CFR Part 63 Subparts BBBBBB or CCCCCC.

Requirements for the applicable state and federal standards listed above have been written directly into PTI 201-03A, therefore compliance with the conditions of this permit demonstrates compliance with applicable state and federal requirements.

#### **A) PTI No. 201-03A**

##### **EU-RACK:**

During the 8/17/2020 inspection CR observed the loading rack (EU-RACK), Tanks (FG-IFRTANKS & FG-ETHANOL) and the Vapor Combustion Unit (VCU). A truck loading fuel was observed with proper connection to the VCU which was also operating as required per EURACK, SC IV.1. Per Mr. La Porte the system is designed so that if there is an issue with the VCU, the loading rack is disabled. The facility maintains a malfunction Abatement Plan (MAP) as required by EURACK, SC III.3 and Rules 609 and 706.

EURACK, Special Condition IV.2 (Rules 609 and 706) prohibits the filling of any delivery vessel with an organic compound having a true vapor pressure greater than 1.5 psia, or any delivery vessel which had a previous load containing an organic compound with a vapor pressure of 1.5 psia unless the vapor balance system is installed, maintained and operated in a satisfactory manner. This condition is referring to seasonal gasoline standards or what Citgo calls the RVP (Reid Vapor Pressure) Season. The facility checks vapor pressures during the RVP season and appears to be meeting requirements specified in IV.2.a-d consisting of vapor tight collection lines, closed hatches and the prevention of liquid drainage from transfer lines. Written procedures as required by SC IV.2 and Rule 609 are maintained onsite.

The VCU is subject to the Performance Standards for Bulk Gasoline Terminals promulgated in 40 CFR Part 60 Subpart XX which Citgo appears to be in compliance with. Daily checklists and monthly leak inspections are being maintained. This standard, as does EU-RACK, SC V.1, requires VOC emission rate verification to be conducted once every five (5) years. The most recent testing was conducted on June 27, 2018, and determined that the VCU emits VOC's at an average rate of 3.90 mg/liters of gasoline loaded, which is well under the limit specified in SC I.4 of 10 mg/liter of gasoline loaded. EURACK VOC's are also limited to 14.0 tpy per SC I.3. Based on loading times and amounts the 3.90 mg/liter calculates out to be 7.30 tpy based on 8,760 hours of active loading, which is a significant overestimation but demonstrates compliance with the 14.0 tpy limit. During testing the terminals vapor collection system components were monitored for leaks which included, all valves, flanges, fittings, seals and check valves. No leaks were detected.

##### **FG-IFRTANKS:**

This flex group consists of tanks 1-5. Tank 5 has not been constructed and per discussions, it is unlikely that Citgo will be moving forward with it. Mr. La Porte is aware that the 18-month construction window (General Condition No. 2) will expire in February of 2021. If Construction does not begin before then Citgo will either need to request an extension or re-permit tank 5.

Per discussions, the existing tanks are equipped with the deck and seal configurations as specified in FG-IRTANKS, SC IV.1.a-d and IV.2.a. of the PTI.

##### **FG-ETHANOL:**

This emission unit consists of three (3) 30,000- gallon fixed roof ethanol storage tanks (EU-Tank11, EU-Tank12 & EU-Tank13). Compliance for this Flex Group is demonstrated by maintaining throughput and emission records, which were requested, provided and reviewed in June 2020 (SEE ACTIVITY REPORT AC\_B625853847).

##### **FGFACILITY:**

Compliance is demonstrated through facility-wide emission limits and throughputs. Records were requested, provided and reviewed in June 2020 (SEE ACTIVITY REPORT AC\_B625853847).

#### **B) MAERS**

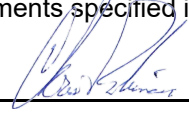
Emissions data for 2019 was received on time on March 12, 2020 and reviewed by the AQD on April 6, 2020. No changes were made to the submittal. The 2019 MAERS report is summarized below.

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Pollutant	Amount (Lbs.)
VOC	37,216.81 (18.61 tons)

**Conclusion**

Citgo appears to be in compliance with applicable air quality rules and regulations which include the requirements specified in PTI No. 201-03A.

NAME 

DATE 8/27/2020

SUPERVISOR 