

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection**

B664670175

FACILITY: Sunoco Pipeline L.P. - Marysville Pump Station		SRN / ID: B6646
LOCATION: 250 Murphy Drive, SAINT CLAIR		DISTRICT: Warren
CITY: SAINT CLAIR		COUNTY: SAINT CLAIR
CONTACT: Shawn Treadaway , Operations Supervisor		ACTIVITY DATE: 12/19/2023
STAFF: Sebastian Kallumkal	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Schedule inspection to verify compliance and complaint investigation		
RESOLVED COMPLAINTS: C-24-00320		

On December 7, 2023, Michigan Department of Environment, Great Lakes & Energy-Air Quality Division (EGLE-AQD) received an odor complaint (C-24-00320) related to Sunoco Pipeline-Marysville Pump Station's (SRN B6646) operations. I tried to contact Scott J. Verhille, Supervisor, Pipeline Operations, Great Lakes District at Sunoco Pipeline on 12/7/2023 at about 12:20 PM to inquire about the odor complaint. I could not reach him but left a message for him regarding the complaint. He did not call me back. On 12/11/2023, I called the previous AQD contact person for the facility, David Misaros, Station Utility Operator, at the facility and asked him about Scott Verhelle. I was told that Scott does not work for the company any longer. David offered to have the current supervisor call me.

Later Shawn Treadaway, Operations Supervisor, contacted me. I told him about the complaint. He informed me that nothing out of the ordinary happened on that day. They were pumping crude oil UHL on that day, and no leaks or maintenance work occurred on that day. According to him, Marysville Fire Department was there because of the odor complaint filed with them and they did not verify an odor or find any possible cause of odor.

On Tuesday, December 19, 2023, EGLE-AQD staff Sebastian Kallumkal conducted an announced, scheduled inspection at Sunoco Pipeline, L.P. (B6646) located at 250 Murphy Drive, Marysville, Michigan. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environment, Great Lakes & Energy, Air Quality Division rules; and the conditions of Permit-To-Install (PTI) Number 178-98C issued for the seven crude oil storage tanks (FGTANKFARM) and EULACTUNIT (Crude oil unloading facility). The purpose of the inspection was also to conduct odor observations to evaluate the odor complaint (Complaint No.: C-24-00320) allegedly related to facility's operations.

I arrived in the area at about 10:35 AM. From that time to about 10:45 AM, prior to arriving at Sunoco Pipeline, LP-Marysville, I conducted drive by odor observations, with the front windows of the vehicle down, starting from the intersection of I-94 & Gratiot Avenue along Gratiot Avenue, Allen Road, Cuttle Road, and to Murphy Drive until where it ends at 300 Murphy Drive. I did not smell any crude oil smell along this route. I did not see any truck at the crude oil unloading area. The wind was NW, 9 -12 mph, Sky: mostly cloudy, (12-19-2023, 10 to 11 AM www.wunderground.com)

Sunoco Pipeline, L.P. is a crude oil storage and transport facility. The facility operates 24 hours a day, and 7 days a week. The facility receives crude oil from two Enbridge pipelines (Line 5 and Line 6) and from local oil wells via tanker trucks. The Enbridge pipelines originate in the province of Alberta in Canada. The crude oil from local wells is delivered via trucks to the crude oil unloading facility near the northeast corner of the property (4851 Gratiot Avenue, Marysville). The crude oil unloading process was permitted under PTI No. 642-88. After a 2018 inspection, Energy Transfer Company which owns the crude oil unloading station (previously

Sun Refining & Marketing Company) requested AQD to incorporate this permit with the permit 178-98B which was issued to Sunoco Pipeline Company. The crude oil delivered to the unloading facility is transferred and stored in Tank 43 which was permitted under 178-98B. Only sweet crude oil is allowed to be delivered via trucks to the unloading facility.

The Sunoco facility receives sweet, synthetic (from Alberta oil sands), heavy and medium heavy crude oils via pipeline or truck (only sweet crude). The facility keeps Safety Data Sheets (SDS) for crude oils. (Attached). The receipt of any type of crude oil depends on the refinery demands. The benzene and hydrogen sulfide contents are included in the SDS. Total Sulfur and Reid Vapor Pressure (RVP) are measured monthly for each product. Records are kept at the facility.

Next, I arrived at facility and met Shawn Treadaway and Frank Cote, Director, Liquid Pipeline Operations Eastern Area, Great Lake District. I introduced myself and stated the purpose of the inspection. During the pre-inspection meeting we discussed facility operations. The facility has six crude oil storage tanks and operates 24 hours per day, and 7 days per week all year along. He told me they did not have any change in tank operations. They only have one tanker company unloading the crude oil to their location using different tanker trucks. They get 1 to 2 unloading per day. The truck company performs H2S testing for all wells once per year. He had sent the tanker inspection and test reports for these tanker trucks.

The company provided report via email for the following inspections:

- American Petroleum Institute (API) Standard 653 In-Service Inspection for Storage Tank #34 was on May 24, 2022. The 10-year inspection for Tank #34 was done in 2017.
- American Petroleum Institute (API) Standard 653 In-Service Inspection for Storage Tank #44 was on May 24 and 25, 2022.
- American Petroleum Institute (API) Standard 653 In-Service Inspection for Storage Tank #46 was on May 25, 2022.

The facility conducts daily (3 times per day, visual walk inspection for leaks), monthly tanks inspections, quarterly tank top alarm inspections (operator goes to the top of the tank and check for overfill protection using monitors) and annual visual VOC checks. Facility provided records of these inspections. Shawn told me that each shift, an operator makes three trips checking on the piping, pumps, valves, etc. to identify any leaks.

The operators perform monthly and annual inspections of all tanks looking for any abnormalities. The operator inspects the internal floating roofs for any leaks every month and additional leak inspections (VOC inspections) annually. If there is leak in any of the tank connections, these can be easily identified because the tanks are painted white. The seals on all the tanks are inspected every 5 years and a complete inspection of the tanks and replacements are conducted every 20 years.

After the pre-inspection meeting, Shawn, Frank and Dave Marlatt, Pipeliner III, accompanied me for a tour of the facility including the truck unloading station. The crude oil from trucks is pumped to Tank 43. No truck was unloading at that time. The pump has a meter which measures the crude oil unloaded. I observed that the MARYSVILLE TRUCK UNLOADING STATION CHECK LIST is posted outside the

pump shed and the daily log of crude oil deliveries (amount, time, etc.) are kept near the pump. The plastic sump (Overfill Protection Sump) collects any left-over crude oil in the hose that was connected to the truck during unloading. The sump was closed at the time of the inspection. I smelled crude oil/gasoline type smell while near the sump/unloading station. I told Shawn about this smell. Dave inspected the sump and found that lid seal was broken and hanging out of place. He opened the lid and fixed it. I did not smell any odor there afterwards. Shawn told me that he will prepare a work order soon to replace the seal. He emailed me that work order on 12/21.

On 12/29, he emailed me stating that they received the sump lid on this day and will install as soon as it is received. On 1/22/2024, I inquired about the installation status, and he informed me that it is already been installed.

On our way back, we walked by the tanks. When walked near Tank #44, I smelled gasoline/crude oil type of smell. I notified Shawn about this, and he indicated he also smelled the odor. He told me that he would have someone go to the tank roof and conduct an inspection and VOC monitoring. We also walked by Tanks #34, #43, #45 and #41. I did not smell any objectionable odor near these tanks. The tanks are painted white. I did not see any crude oil leaks on the tanks.

On December 21, 2023, he emailed me the results of the Tank #44 inspection. Inspection was done on 12/20/2023 by David Marlatt. According to the report, he did not observe any abnormalities.

In response to another odor complaint received on 12/20/2023, I contacted the facility to verify if they observed any odor near Tank #44. Shawn indicated that they have not noticed "any increase or change" in odor near the sump or tank #44.

After the tour of the facility, I reviewed the permit requirements with Shawn. He had already sent me the copies of the inspection records, emission calculations and the tank throughput. He informed me that the emission calculations are kept by Jared Everitt, Environmental Specialist, Energy Transfer.

At about 11:45 AM, I left the facility. From that time to about 12:00 Noon, I conducted drive by odor observations, with the front windows of the vehicle down, starting the end of Murphy Drive to Gratiot Avenue to Allen Road, Cuttle Road, and back to Murphy Drive until where it ends at 300 Murphy Drive. I did not smell any crude oil smell along this route. I did not see any truck at the crude oil unloading area. The wind was NW to WNW, 10-12 mph, Sky: partially cloudy, (12-19-2023, 11 AM to 12 Noon www.wunderground.com). I did not visit the complainant at this time.

I came back to the area at about 12:35 PM, after another site inspection. I conducted odor observations until 12:45 PM along the same route as above. I did not experience any odor along these routes.

FACILITY OVERVIEW

Sunoco Pipeline, L.P.'s Marysville facility currently has six fcrude oil storage tanks (EUTANK 34, EUTANK41, EUTANK43, EUTANK44, EUTANK45, and EUTANK46) ranging from 4 million gallons to 11.5 million gallons in volume. EUTANK36 is also included in the permit, but this tank has been disassembled and is no longer at the facility (Letter to DEQ-AQD dated January 4, 2016). From the storage facility, the crude oil is transported to the Marathon Refinery in southwest Detroit, British

Petroleum's refinery in Toledo, Ohio, and the Toledo Refining Company through pipeline. No crude oil transported out via tanker trucks.

The Enbridge facility which is located south and adjacent to Sunoco Pipeline is a separate company and it delivers crude oil via two pipelines (Line 6 coming from Chicago and Line 5 coming from Wisconsin through Michigan Upper Peninsula).

The facility has only one pipeline to deliver crude oil to refineries. No crude oil is sent out using trucks. The crude oil coming in and going out events are scheduled.

EUTANK44, EUTANK45, and EUTANK46 are subject to the requirements of New Source Performance Standard (NSPS) Subpart Kb for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. EUTANK44, EUTANK45, and EUTANK46 were constructed in 1987, 1994, and 2007, respectively. EUTANK34, EUTANK41, and EUTANK43 were constructed in 1960, 1961, and 1967, respectively, and are, therefore, not subject to NSPS Subparts K, Ka, or Kb for Petroleum Liquid Storage Vessels (NSPS Subpart K applies to tanks constructed between June 11, 1973, and May 19, 1978, and NSPS Subpart Ka applies to tanks constructed between May 18, 1978, and July 23, 1984).

Other than the crude oil storage tanks, the facility has 5 electric pumps which are used to pump oil into and out of the storage tanks, a small propane heater in the maintenance garage, electric furnaces on the drop ceiling of the company's office, and a natural gas-fired 25 kW Generac emergency generator manufactured in 2010. The emergency generator is used to provide electricity for lighting and for the mechanical gate at the entrance to the facility in the event of a power outage.

COMPLIANCE DETERMINATION

Emergency Generator

The 25 KW, Natural gas fired, SI, Generac, emergency generator is Subject to 40 CFR 63, Subpart ZZZZ for Reciprocating Internal Combustion Engines, but the AQD has not accepted delegation for this subpart at area sources of hazardous air pollutant emissions. The facility is keeping hours of operation of this generator. This RICE is also subject to 40 CFR 60, Subpart JJJJ-New Source Performance Standards for Spark Ignition Internal Combustion Engines pursuant to 40 CFR 60.4230(a)(4)(iv).

The engine should be equipped with a non-resettable hour meter. Also, if this engine is a certified engine, permittee must keep a maintenance plan and records of conducted maintenance to demonstrate compliance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. If this engine was not purchased as certified, permit must:

- Keep a maintenance plan and records of conducted maintenance
- To the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions
- Conduct an initial performance test to demonstrate compliance with emission limits specified in Table 1 of 40 CFR 60, Subpart JJJJ.

Compliance for this emission unit was not verified during this inspection.

PTI NO. 178-98C

EULACTUNIT

During the odor observations while on inspection, I did not observe any tanker truck at the unloading area. I did not observe any visible emissions.

The testing (11-20 through 12-9-2023) of the crude oil sites showed that the H₂S vapor phase concentration is 0 ppm. (See email from 12-18-2023). The records show that the unloading trucks are leak and pressure tested annually. The submitted records show that the unloading was conducted during the allowed time. The facility had previously submitted records of the sulfur content (%wt) testing for the sites. Apart from the one-time sweet crude demonstration for wells prior to initial delivery, Sunoco does not routinely test for total sulfur content of the crude oil unloaded at the LACT unit.

Permittee is keeping records of the truck inspections, daily crude oil deliveries and has posted the truck driver's checklist, as required in the permit.

The facility submitted SDS for the crude oil that is transported through the site. They conduct monthly total sulfur measurements for all the crude oil tanks. They submitted the sulfur content tests.

FGTANKFARM (EUTANK34, EUTANK 41, EUTANK 43, EUTANK44, EUTANK45, EUTANK46)

SC 1.1 limits the crude oil throughput to 194,565,000 barrels per 12-month rolling period as determined at the end of each calendar month. The submitted records show that the total throughput was 47,819,257 barrels (2,008,408,794 gallons) for the January through December 2022 and 43,636,947 barrels (1,832,751,774 gallons) as of Jan- Nov, 2023 June 2019. This is in compliance with the throughput limit.

SC 1.2 and 1.4 require that the facility shall comply with all provisions of the Federal Standards of Performance for New Stationary Sources as specified in 40 CFR 60, Subpart A and Kb, as they apply to EUTANK44, EUTANK45, and EUTANK46 and equip and maintain the storage tanks with deck and seal configuration listed in the Table for SC 1.4. (see attached inspection records)

All-storage tanks are equipped with internal floating roofs, welded deck, either mechanical shoe or vapor mounted primary seal and rim-mounted secondary seal as required by the PTI. Based on the process description submitted with the PTI application, the storage tanks appear to be in compliance with the floating roof requirements for 40 CFR 60, Subpart Kb as required in SC 1.2 and 1.4. (See attached inspection records)

The facility conducts annual VOC tanks inspections (visually), quarterly tank overfill/tank top alarm inspections, and monthly AST inspections.

SC 1.3 requires that EUTANK34, EUTANK36 (currently removed from site), EUTANK41, and EUTANK43 operated in compliance with R336.1604. Based on the information gathered during the inspection and the process description, these storage tanks appear to be equipped with internal floating roofs and proper seals.

From the information available the tanks appear to be in compliance with Rule 604 requirements. (See attached inspection records)

SC 1.4 requires that the facility shall perform inspections and monitor operating information for EUTANK44, EUTANK45 and, EUTANK46 in accordance with the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and Kb. The facility conducts the required inspections monthly on each of the six active storage tanks including EUTANK34, EUTANK41 and EUTANK43. PTI #178-98B only requires such inspections (visual inspections of the internal floating roof, the primary seal, or the secondary seal) be conducted on the three tanks subject to NSPS Subpart Kb (EUTANK44, EUTANK45, and EUTANK46) every 12 months after the initial fill. I collected copies of the records of the inspection records for AQD file. (See attached inspection records)

Facility performs:

- per shift, three drive by observations looking for leaks
- weekly and monthly walk by tanks inspections looking for leaks,
- quarterly overfill protection alarm inspections, (high alarm, high-high alarm-shut down filling),
- annual seal inspections.

He told me that the next degassing and seal repair inspection (pursuant to API 653) would be in February 2026 for Tank #46.

According to 40 CFR 60.113b(a)(2), the storage tanks equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. The facility appears to be in compliance with this requirement based on the records submitted (VOC Tank Inspection Form).

If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the facility shall repair the items or empty and remove the storage vessel from service within 45 days. The report for each tank indicates “No” for the presence of liquid on the roof.

According to 40 CFR 60.113b(a)(4), the permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL.

40 CFR 60.113b(a)(4) further requires that the above inspections shall be conducted every 10-year intervals in the case of storage tanks conducting the annual visual inspection as specified in 40 CFR 60.113b(a)(2).

Inspection	Tank 34	Tank 41	Tank 43	Tank 44	Tank 45	Tank 46
API 653	May 2022			May 2022		May 2022
VOC insp.				Dec. 2022	Dec. 2022	Dec. 2022

No tanks are scheduled for the 10-year detailed seal inspections to be performed in 2023.

SC 1.6 requires that all required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available to by the 15th day of the calendar month for the previous calendar month. The facility appears to be in compliance with this requirement.

SC 1.7 requires that the facility shall keep records of the throughput for each tank in FGTANKFARM for each calendar month and 12-moth rolling time period as determined at the end of each calendar month. The records show that the facility is keeping monthly and 12-month throughput records for each tank and total throughput. (see attached records)

SC 1.8 requires that facility keep records of inspections and operating information for EUTANK44, EUTANK45 and EUTANK46 in accordance with 40 CFR 60, Subparts A and Kb. The facility appears to be keeping the necessary records. Facility started keeping records of the VP of the liquid stored in each month or storage period with the throughput data. _

FGFACILITY

SC 2.1a limits Volatile Organic Compound (VOC) emissions from FGFACILITY to less than 90 tons per year (TPY) based on a 12-month rolling time period. The submitted records show that the 2022 Jan-Dec. VOC emissions were 11.82 Tons and the 2023, Jan-Nov. VOC emissions were 11.73 Tons. The facility is in compliance with the VOC emission limit.

SC 2.1b limits each (single) Hazardous Air Pollutant (HAP) emissions to less the 9 TPY based on a 12-month rolling time period. The 2022 Jan-Dec. and 2023 Jan-Nov. records show that the largest single HAP (n-Hexane) was 0.17 tons and 0.13 tons, respectively.

SC 2.1c limits Total (aggregate) HAP emissions to less than 22.5 TPY based on a 12-month rolling time period. The 2022 Jan-Dec. and 2023 Jan-Nov. records show that aggregate HAP emissions were 0.42 tons and 0.41 tons, respectively. The facility calculated VOC and HAP emissions using TANKS 4.0.9d program.

SC 2.2 requires the facility to complete all required semi-annual calculations in a format acceptable to the AQD District Supervisor and made available by the last day of the calendar month following the end of the semi-annual time period. The facility appears to be in compliance with this requirement.

SC 2.3 requires that the facility shall keep, in a satisfactory manner, records of semi-annual VOC, individual HAP, and Total HAP emission rate calculations for

FGFACILITY, as required by SC 2.1a, SC 2.1b and SC 2.1c. Also, that each semi-annual calculation (January 1-June 30 & July 1 – Dec. 31) shall include monthly calculations for each month in the semi-annual period. From the submitted records the facility appears to be in compliance with this requirement.

The submitted reports were marked “Proprietary & Confidential”. I inquired Shawn whether these records need to be kept “CONFIDENTIAL” and requested an explanation if so needed. He responded, via email on 1/25/2024, that Sunoco treats all facility maintenance or work order issues as confidential to the extent that they may raise security sensitive issues on site access and contractors entering the facilities. Sunoco agree that this particular information (submitted records) should not be treated as confidential.

Conclusion: Based on this inspection and records review, Sunoco Pipeline, L.P.-Marysville facility appears to be in compliance with the conditions of its PTI and other applicable air rules and regulations. The records cited are attached for review.

During the odor observations for the complaint investigation, I did not observe any objectionable odor with intensity, duration and frequency to cause a Rule 901 violation. Follow up odor observations would be conducted after future complaints or while in the area. These complaints are considered “RESOLVED” at this time. I emailed the complainant about the odor observations on December 27, 2023.

NAME Sebastien Kallenkal

DATE 03/04/2024

SUPERVISOR Joyce