

B7155
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DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

B715564528

FACILITY: WOLVERINE PIPELINE CO		SRN / ID: B7155
LOCATION: 20491 WEST RD, TRENTON		DISTRICT: Detroit
CITY: TRENTON		COUNTY: WAYNE
CONTACT: Spencer Welling , Field Regulatory Specialist		ACTIVITY DATE: 09/13/2022
STAFF: Jorge Acevedo	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

COMPANY NAME : Wolverine Pipeline
FACILITY ADDRESS : 20491 West Road, Woodhaven, MI
STATE REGISTRAT. NUMBER : B7155
SIC CODE :
EPA SOURCE CLASS : B
EPA POLLUTANT CLASS :
LEVEL OF INSPECTION : scheduled inspection
DATE OF INSPECTION : 9/13/22
TIME OF INSPECTION : 1:30 PM
DATE OF REPORT :
REASON FOR INSPECTION : Scheduled
INSPECTED BY : Jorge Acevedo
PERSONNEL PRESENT :
FACILITY PHONE NUMBER :
FACILITY FAX NUMBER :

FACILITY BACKGROUND

Wolverine Pipe Line Company operates a petroleum product break-out/storage facility located at 20491 West Road, Woodhaven, Michigan. Wolverine Pipe Line is an unmanned facility which operates a "transmix" tank to temporarily store mixed petroleum products, which are created in the delivery pipeline during product changeover.

INSPECTION NARRATIVE:

On September 13, 2022, I conducted a scheduled inspection of Wolverine Pipeline Company. I arrived at the facility around 1:30 PM. I met with Spencer Welling, of Wolverine Pipeline. Wolverine Pipeline applied for a permit in 2016 to increase throughput to an existing Transmix tank and to remove the truck loading emission unit since it is no longer in service. The permit was issued in January 2017. Mr. Welling explained how the facility operates to me. The facility has one pipeline coming into the facility carrying petroleum liquids such as gasoline and diesel. The site is remotely operated. The pipeline is a sixteen inch line and there are two lines that are six inches that are used to pump liquids out. Throughput is recorded through a turbine meter and liquids that are in the transition zone are pumped into the tank. I observed the tank and it appeared to be in good condition. I climbed the ladder to look at the top of the tank. I did not see any visible damage and the hatch appeared to be secure. Mr. Welling explained the different levels that would set off alarms and he explained the procedures to address the various situations. Mr. Welling said that the tank had the five year inspection in 2021. He explained that there were no major issues as a result of the inspection. I said I would follow up with him for a copy of the inspection report if I didn't find one in the AQD files. We sat down in the office to go over records. It did not appear that there were any exceedances of material throughput or emission limit. After observing the tank, I left the facility at 2:00PM.

COMPLAINT/COMPLIANCE HISTORY:

There has not been any citizen complaints registered nor violations issued against Wolverine Pipe Line, LLC.

OUTSTANDING CONSENT ORDERS:

None

OUTSTANDING LOVs

None

OPERATING SCHEDULE/PRODUCTION RATE:

This facility operates 24 hours a day, 365 days a year.

PROCESS DESCRIPTION

Wolverine Pipeline is located at 20491 West Road in Woodhaven, Michigan between Allen Road and I 75. The area is primarily industrial-commercial and the nearest residence is approximately 1200 yards west of the facility's property line.

Wolverine Pipe Line Company operates a petroleum product break-out/storage facility. The facility receives both gasoline and diesel through pipeline. As product that is flowing through the pipeline switches, the mixture is called "Transmix". The mixture is then stored onsite in a 210,000 gallon floating roof tank.

APPLICABLE RULES/PERMIT CONDITIONS:

Wolverine Pipeline is an existing opt-out source for VOCs and HAP. The storage tank is subject to 40 CFR 60, Subpart Kb, storage tanks. The company recently was issued Permit to install to increase their throughput from 2,000,000 gallons to 8,400,000.

Compliance with PTI- 15-06A was evaluated:

The following conditions apply to: EUTRANSMIXTANK

DESCRIPTION: 210,000 gallon internal floating roof storage tank with a mechanical shoe seal

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Internal floating roof

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

Material	Limit	Time Period / Operating Scenario	Compliance Determination
1. Transmix	8,400,000 Gallons	12-month rolling time period, as determined at the end of each calendar month	Compliance- PTI 15-06A was issued January 4, 2017 and rolling 12 month totals are below 1,000,000 gallons.

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate EUTRANSMIXTANK unless all of the following are installed and operating properly: (R 336.1205(3), R 336.1702(a), 40 CFR 60.112b(a)(1))

a) The vessel is equipped and maintained with a floating cover or roof which rests upon, and is supported by, the liquid being contained and has a closure seal or seals to reduce the space between the cover or roof edge and vessel wall. The seal or any seal fabric shall not have visible holes, tears, or other nonfunctional openings.

b) All openings, except stub drains, in any stationary vessel subject to the provisions of this rule shall be equipped with covers, lids, or seals so that all of the following conditions are met:

i) The cover, lid, or seal is in the closed position at all times, except when in actual use.

ii) Automatic bleeder vents are closed at all times, except when the roof is floated off, or landed on, the roof leg supports.

iii) Rim vents, if provided, are set at the manufacturer's recommended setting or are set to open when the roof is being floated off the roof leg supports.

Compliance- Tank was equipped with floating roof. There did not appear to be visible holes. There did not appear to be signs of any leaks through visible observations and there were no odors to indicate loss of material from the tank. AQD requested the 5 year inspection report and will file it in the facility's file.

IV. DESIGN/EQUIPMENT PARAMETERS

The permittee shall equip and maintain EUTRANSMIXTANK with the deck and seal configuration listed in the following table, or a deck and seal configuration that results in the same or lower VOC emissions from the tank.

Equipment	Deck Type	Primary Seal	Secondary Seal	Compliance Determination

Equipment	Deck Type	Primary Seal	Secondary Seal	Compliance Determination
EUTRANSMIXTANK	Welded	Mechanical Shoe	NA	Compliance- Tank was equipped with welded deck.

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. (R 336.1205(3))

Compliance- Calculations were completed in timely manner.

2. The permittee shall keep records of the EUTRANSMIXTANK throughput for each calendar month and 12-month rolling time period. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. (R336.1205(3))

Compliance- Records are kept for each calendar month and 12-month rolling time period.

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

The following conditions apply Source-Wide to: FGFACILITY

POLLUTION CONTROL EQUIPMENT:

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Compliance Determination
1. VOC	0.64 tpy	12-month rolling time period as determined at the end of each calendar month.	Compliance- Rolling 12-month total VOCs are less than 0.64 tpy

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

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NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall keep, in a satisfactory manner, records of monthly and 12-month rolling time period VOC emission rate calculations for FGFACILITY, as required by SC I.1. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. (R 336.1205(3))

Compliance- Calculation records are kept.

VII. REPORTING

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. (R 336.1205(3))

Compliance- Calculations were completed in timely manner.

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:

N/A

MAERS REPORT REVIEW:

FEE CATEGORY: D- Subject to NSPS(40 CFR 60 Subpart Kb)

Pollutant	2021 Emissions (TPY)
VOC	0.4

FINAL COMPLIANCE DETERMINATION:

The facility appears to be in compliance with applicable regulations at the time of the inspection.

NAME Jan 5th

DATE 9-30-22

SUPERVISOR April L. Wendling
11/07/2022