

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

B777835794

FACILITY: Buckeye Terminals, LLC - Ferrysburg Terminal		SRN / ID: B7778
LOCATION: 17806 NORTH SHORE DRIVE, FERRYSBURG		DISTRICT: Grand Rapids
CITY: FERRYSBURG		COUNTY: OTTAWA
CONTACT: Matthew Sanders , Terminal Operator		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. 347-96A 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 Buckeye Terminals, LLC located at 17806 Northshore Drive, Ferrysburg, MI. The purpose of this inspection was to determine compliance with PTI No. 347-96A and all other applicable Air Quality Rules and Regulations.

KD arrived on site at approximately 12:40 pm and met with Mr. Matthew Sanders, Terminal Operator. Mr. Sanders is the only employee running the terminal. KD presented Mr. Sanders with the Environmental Rights and Responsibilities pamphlet, which was briefly discussed. KD asked about any modifications or new pieces of equipment at the terminal. Mr. Sanders explained that they had replaced the carbon bed for the Vapor Recovery Unit (VRU) in 2014, and had also upgraded their digital reporting system for the VRU inside of the office. Buckeye had previously discussed these changes with AQD, and was found to be exempt. Please reference the permit file for complete details. No visible emissions or odors were detected from off-site, and only faint gasoline odors were present at various locations during the walk-through of the terminal. KD left the facility at approximately 1:50 pm.

Facility Description

Buckeye Terminal, LLC (Buckeye) is a fuel distribution facility that obtains product via pipeline in cycles. The facility also obtains ethanol and biodiesel via tanker trucks. Per Mr. Sanders, Buckeye has not had biodiesel in over a year. Tanks 7 and 8, which are dedicated to holding biodiesel have been empty for over a year. All fuel types are available to be loaded in each of the three (3) loading bays.

Regulatory Analysis

Buckeye is a Synthetic Minor source that currently holds one (1) Opt-Out permit, PTI No. 347-96A and is subject to new source performance standard (NSPS) 40 CFR Part 60 Subpart XX for Bulk Gasoline Terminals, and National Emission Standards for Hazardous Air Pollutants 40 CFR Part 63 Subparts BBBBBB for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities and CCCCCC for Gasoline Dispensing Facilities. Michigan is currently not delegated for Subparts BBBBBB and CCCCCC, thus they will not be further reviewed.

Compliance Evaluation

The tour of the terminal started with touring the loading rack area. The loading rack area is equipped with vapor tight collection lines for loading of the trucks. The loading rack is also controlled by either a Vapor Recovery Unit (VRU) or a Vapor Combustion Unit (VCU). The VRU is the primary control equipment utilized. Per Mr. Sanders, the VCU is used when the VRU is down for maintenance or in other emergency situations. The VCU was not running at the time of the inspection, nor has it operated in the past year. At the time of the inspection, the VRU appeared to be properly operating. The methane reading was at 0.02%, and the non-methane hydrocarbons reading was at 0.00%. Volatile Organic Compound (VOC) emissions from EU-LOADRACK are limited to 45.2 tons per year (tpy) 12-month rolling. As of June 2016, the VOC Emissions were 11.64 tons; the highest monthly emissions were in May, 2016 with VOC emissions of 1.28 tons. Additionally, VOC emissions from EU-LOADRACK are limited to 35 mg/L of product loaded while controlled by the VCU and 10 mg/L of product loaded while controlled by the VRU. The most recent testing, done in 2013, indicates the VOC emission rate as 3.46 mg/L. Buckeye also appears to be using proper maintenance practices and safeguards. Example maintenance records are attached to this report. The 12-month rolling throughput through EU-LOADRACK is 280,921,278 gallons. All recordkeeping for EU-LOADRACK appears to be adequate. All provisions for Rule 706 appear to be met; KD was able to see the much of the safety provisions addressed in Rule 706, such as the pressure-vacuum relief valves, drainage devices, written procedures, and a vapor tight collection line. Other requirements of Rule 706 addressing throughput have been addressed elsewhere in the permit and are compliant.

Buckeye has several storage tanks, which are listed in Table 1 below.

Table 1: Buckeye Terminals, LLC Tank Descriptions with Capacities

Emission Unit	Emission Unit Description	Capacity (gal ^A)
EU-TANK1	Premium gasoline storage tank with an IFR ^B	1,414,236
EU-TANK2	Regular gasoline storage tank with an IFR	3,789,742
EU-TANK3	Regular gasoline storage tank with an IFR	3,847,755
EU-TANK4	Ultra-low sulfur diesel fuel storage tank with a fixed roof	2,793,644
EU-TANK5	Ethanol storage tank with an IFR	783,209
EU-TANK7 ^C	Biodiesel storage tank	Temporarily empty ^D
EU-TANK8 ^C	Biodiesel storage tank	Temporarily empty ^D
EU-TANK9	Additive storage tank with a fixed roof	10,575
EU-TANK13	Additive storage tank with a fixed roof	8,162
EU-TANK14 ^C	Additive storage tank	7,800
EU-TANK16 ^C	Additive storage tank	4,261
EU-TANK17 ^C	Additive storage tank	2,012
EU-TANK18 ^C	Additive storage tank	4,261

^A All capacities are listed in Gallons, unless otherwise noted.

^B IFR: Internal Floating Roof

^C These storage tanks, while not listed in the emission unit identification table are included in FG-TANKS for emissions tracking, but are all exempt from Rule 201 permitting under Rule 284 (i).

^D This tank has been empty for the last year.

Throughput through FG-TANKS is limited to 380,165,232 gallons, 12-month rolling; as of June 2016, throughput was 280,927,198 gallons. The highest monthly throughput in the last 12-months was May 2016, with a throughput of 30,109,772 gallons. VOC emissions from FG-TANKS are limited to 26.9 tons per 12-month rolling. As of June 2016, VOC emissions were 12.4239 tons. The highest monthly VOC emission, in the past 12 months, was in October 2015 at 1.4652 tons. Hazardous Air Pollutants (HAPS) are individually limited to 6 tons and aggregately limited to 8 tons. As of June 2016 the 12-month rolling aggregate HAP emissions were 0.9313 tons. The highest 12-month rolling average over the past 12 months was in July 2015 at 1.3199 tons. Hexane, the largest HAP emitted, was emitted at 0.5256 tons in June 2016 with the highest moth being July 2016 at 7.631 tons. All recordkeeping appears adequate.

Buckeye also seems to be in compliance with the requirements of 40 CFR Part 60 Subpart XX (Special Condition 8 of PTI 347-96A. The most recent stack testing data indicates compliance with the emission limits (2.59 mg/L fuel and 3.46 mg/L gasoline). Buckeye is keeping proper maintenance records for the VRU and the loading rack (attached). Terminal loading instructions and rules, and leak detection records appear to be adequate.

Compliance Determination

Based on the observations made during the inspection and a subsequent review of the records, it appears as if Buckeye Terminals, LLC is in compliance with PTI no. 347-96A and all applicable air quality rules and regulations.

NAME

Kaitlyn Davis

DATE

9/23/2016

SUPERVISOR

[Signature]