

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

B777870977

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: 01/25/2024
STAFF: Chris Robinson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY '24 on-site inspection to determine the facility's compliance status with applicable air quality rules and regulations including PTI no. 347-96C.		
RESOLVED COMPLAINTS:		

On January 25, 2024, staff Chris Robinson (CR) and Laura Martin from Michigan's Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) conducted an unannounced inspection of Buckeye Terminals, LLC - Ferrysburg Terminal (SRN B7778) located at 17806 North Shore Drive in Ottawa County, Ferrysburg, Michigan. The purpose of this inspection was to determine this facility's compliance with applicable state and federal air quality rules and regulations including Permit to Install (PTI) 347-96C. Prior to entry AQD staff surveyed the perimeter for odors and visible emissions, none were observed.

Upon entry CR and LM met Buckeye's Terminal Operators Matthew Sanders (MS) and Zachary Toel. The intent of the visit was relayed, and identification provided. The PTI was first discussed which was followed by a walkthrough of the facility and then a brief post meeting. Per discussions with MS there have been no changes since the last inspection. Records were requested from Buckeyes Air Compliance Specialist Dhaval Shah, which were provided for the time period of January 1, 2023, through December 31, 2023, as requested.

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. Mr. Sanders indicated that tanks seven (7) and eight (8), which are dedicated to holding biodiesel, have been empty since the last inspection and that the facility does not use any transmix fuel.

Compliance Evaluation

Buckeye operates under PTI 347-96C and is subject to several federal regulations including New Source Performance Standards (NSPS) 40 CFR Part 60 Subpart XX for Bulk Gasoline Terminals, and National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 60 Subpart BBBBBB for Gasoline Distribution Bulk Terminals and NESHAP 40 CFR Part 63 Subpart CCCCCC for Gasoline Dispensing Facilities. Michigan is not currently delegated enforcement of NESHAP Subparts BBBBBB and CCCCCC, thus compliance with these standards was not determined.

A) PTI No. 347-96C

EULOADRACK:

This emission unit consists of a loading rack used to deliver fuel to the trucks from the storage tanks. The loading rack area is equipped with vapor tight collection lines for loading of the trucks. Emissions are primarily controlled by a Vapor Recovery Unit (VRU). The facility does have a Portable Vapor Combustion Unit (PVCU). The system is designed so that if there is an issue with the VRU, the

PVCU will be used otherwise the loading rack is disabled. A truck loading fuel was observed with proper connection to the VRU.

EULOADRACK is subject to the emission and material limits specified in the table below.

Pollutant	Limit	Time Period	Maximum Amount
VOC	31.5 tpy	12mth rolling	24.55 (Dec)
VOC	35 mg/L when using VCU	Continuously	See discussions below
VOC	10 mg/L when using VRU	Continuously	
VOC	9.3 mg/L as fugitive emissions	Continuously	
VOC	14.75 tpy as fugitive emissions	12mth rolling	Max = 5.96 tons (Dec)
Gasoline, transmix, and ethanol	380,000,000 gallons through EULOADRACK	12mth rolling	Max = 248,033,261 gallons (Dec)
	The 380,000,000-gallon throughput is further limited to only 150 million gallons if the facility exhausts EULOADRACK to the portable VCU.		NA (See discussion below)

The total throughput reported of 248,033,261 gallons includes No. 2 fuel oil and additives which do not appear to be part of the 380,000,000-gallon limit. However, the total for everything is less than the limit for gasoline, transmix, and ethanol. Therefore, this still demonstrates compliance with the 380,000,000-gallon throughput limit. Also, the PVCU was not used in 2023 therefore compliance with the 150,000,000 throughput is not required to be demonstrated.

The 35 mg/L continuous Volatile Organic Compound (VOC) emission limit only applies when the VCU is being utilized for control. The VCU was replaced with the PCVCU a while back so this condition should reference the PVCU not VCU. The PVCU did not operate in 2023.

The VRU is equipped with a Continuous Emission Monitoring System (CEMS) for VOC's. A Relative Accuracy Test Audit was last completed on the CEMS on February 28, 2024. No issues were noted. This test is being conducted as a requirement of 40 CFR Part 63, Subpart BBBB, which the AQD does not have delegation for.

VOC verification testing to verify compliance with the 10 mg/L, when using the VRU, and 9.3 mg/L fugitive VOC emissions listed above was last conducted in 2013 and indicated that the VOC emission rate was 3.46 mg/L, which is within the limits. Additional testing of VOC emissions as allowed per EULOADRACK SC V.1 is not being required at this time. Buckeye appears to be using proper maintenance practices and safeguards. Example maintenance records are attached to this report. The facility maintains a malfunction Abatement Plan (MAP) onsite as required by EURACK, SC III.3 and written procedures as required in Rule 609. Spare parts are on hand as required by the MAP and they are properly tracking maintenance and repairs.

40 CFR Part 60 Subpart XX requires a vapor tight collection system to the delivery trucks and terminal, delivery truck identification numbers to be recorded so they can be cross checked to verify that tank tightness documentation is available. Monthly inspections of the vapor collection

system must be conducted which can consist of sight, sound, or smell. Staff are frequently monitoring for leaks by sound, sight, and smell however, a Fromal LDAR inspection is conducted monthly, forms are attached. If leaks are detected maintenance is conducted as needed. Maintenance forms are also attached.

FGTANKS:

This flexible group consists of a group of seven (7) fuel storage tanks (EUTANK1, EUTANK2, EUTANK3, EUTANK4, EUTANK5, EUTANK9, EUTANK13) subject to a 12-month rolling VOC emission limit of 42.7 tpy and a throughput limit 380,711,232 gallons of gasoline, transmix, and ethanol combined. The throughput limit includes tank-to-tank transfers and other maintenance operations. Based on the facility records the maximum 12-month rolling monthly VOCs emitted from all tanks was 15.56 (Dec) tons with a maximum 12-month rolling throughput of 248,042,023 tons (Dec). Both the VOC emission and throughput include tanks not included in FGTANKS, however the emissions calculated are still less than the limits specified in the permit.

Buckeye appears to be maintaining necessary records and operating FGTANKS within the required limits of their permit.

FGFACILITY:

In order to not be subject to Title V requirements (40 CFR Part 70) Buckeye has accepted restrictions limiting facility-wide VOC emissions to 89.4 tpy. Based on the facility records the maximum 12-month rolling VOCs emitted for the entire facility was 24.55 tons (December 2023).

B) Emissions Reporting

Emissions data for 2023 was not available for review at the time this inspection report was prepared. The 2022 emissions data was submitted on time but not selected for review in 2023. In order to meet the requirements of a Full Compliance Evaluation (FCE) CR conducted a cursory review of the 2022 emissions which is summarized in the table below. Emissions were consistent with previous years.

Pollutant	Amount (tons)
VOCs	24.04
Benzene	0.21

Conclusion

Buckeye appears to be in compliance with applicable air quality rules and regulations including the requirements specified in PTI No. 347-96C.

NAME 

DATE 3/15/24

SUPERVISOR 