

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

B817641120

FACILITY: MARATHON PIPE LINE LLC (Samaria)		SRN / ID: B8176
LOCATION: 2185 W. SAMARIA RD, SAMARIA		DISTRICT: Jackson
CITY: SAMARIA		COUNTY: MONROE
CONTACT: Todd Scarborough , Senior HES Professional		ACTIVITY DATE: 08/17/2017
STAFF: Diane Kavanaugh-Vetort	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Conducted complete scheduled facility inspection PCE/FCE. SM Opt-Out facility; Cat II NSPS Subpart Kb		
RESOLVED COMPLAINTS:		

B8176 Marathon Pipe Line L.L.C (MPL), Samaria, Monroe County. MPL representatives present during the inspection:

(Primary contact) Todd Scarborough, Senior HES Professional, 419-672-6333,
tscarborough@marathonpetroleum.com

Ray Price, Area Manager, 734-676-7775 ext 17, rwprice@marathonpetroleum.com

Amy Fagan, HES Professional
Rebecca Church, Operations Supervisor

On August 17, 2017, I conducted a complete scheduled compliance inspection of the Marathon Pipe Line LLC (MPL) facility located on Samaria Road, Samaria, MI, Monroe County. The inspection was announced prior in order to gain access to the site which is not manned 24/7 and to meet with the appropriate Facility environmental regulatory contact. The last AQD compliance inspection was conducted in June 2012. The purpose of the inspection was to determine the facility compliance status with applicable federal and state air pollution control regulations, specifically Act 451, Part 55, Air Pollution Control Regulation, the administrative rules and the conditions of Marathon's Air Use Permit to Install (PTI) No. 224-96D, which is an OPT-OUT for volatile organic compounds (VOC) and hazardous air pollutants (HAP). MPL is also subject to the federal New Source Performance Standard (NSPS) 40 CFR 60 Subparts A and Kb for Volatile Organic Liquid Storage Vessels for which construction/ reconstruction or modification commenced after July 23, 1984. Past inspection report identifies this site as a custody transfer location which receives various grades of sweet, sour crude oil and naphtha (transmix) from Mid-Valley Pipe Line Company 20" pipeline, the Sun Pipe Line Company 8" pipeline, the Enbridge Oil Company pipe line from Canada and trucked-in crude oil from Southern Michigan wells. Contact, Todd Scarborough, indicated the Enbridge pipeline is currently idle and has not been active in approximately 4 years. In addition Tanker delivery has also not been active in about 3 years.

The site is fenced with a closed security gate and a second entrance with a pad-locked gate. Upon my arrival I observed that the neighboring house to the west bordering the facility has been removed and the lot is completely cleared except for vegetation. MPL purchased this property some time ago following a complaint issue. I pulled up to the main gate and it was opened for me. I met with the new AQD contact Todd Scarborough, Health, Environment, Safety professional and followed him to the office trailer on site. We then conducted a pre-inspection conference and I was introduced to the other Marathon staff indicated above.

I provided identification and stated the purpose of the inspection. We discussed the MPL PTI No. 224-96D and I went over what records are required to be maintained by the facility. I informed them that I would be requesting certain records as needed to determine MPL's compliance status. I requested information and copies of records relating to MPL's Operations and Maintenance (O&M) and Preventative Maintenance (PM) for the Tanks. There are differences in OM / PM for the NSPS subject tanks (711 & 712) and the other non-NSPS tanks (705 through 710).

Todd and Ray provided me with general information about this Marathon location. The facility operates 24/7 with operators onsite M - F, 7 AM to 4 PM. All fuel stored here is piped to the Marathon Refinery in Detroit. There are three major pipelines supplying Crude Oil to this facility as stated above these are Enbridge, and Sunoco, which is the umbrella company or parent of Mid-Valley and Sun Pipe Line. The only fuel is Crude oil and one tank stores Transmix, which in prior inspection reports was identified as Naphtha. Currently Tank 706 is storing Transmix.

Marathon's PTI No. 224-96D contains the following Emission Unit (EU) and Flexible Groups (FG):

EUTANK705, 706, 707, 708 709 and 710 (External floating roof storage. Primary seal mechanical shoe and Secondary seal rim mounted)

EUTANK711, 712 (Fixed cone roof tank with welded steel internal floating roof with mechanical shoe primary seal. No secondary seal.). NSPS Subpart Kb subject.

FGINTFLOATROOFTK includes the two internal floating roof tanks 711 and 712.

FGTANKFARM includes ALL tanks plus equipment covered by other permits (none at this time), grandfathered equipment and exempt equipment.

FGFACILITY includes ALL tanks plus equipment covered by other permits (none at this time), grandfathered equipment and exempt equipment.

During the inspection all of the Tanks were operational (filled to some level) with the exception of Tank 707. Prior inspection indicated that Tank 707 has been emptied and idled since September 2011. MPL conducted the last overall inspection of this Tank on September 27, 2011. Per Todd and Ray, it would be very expensive to refurbish in order to put back into service.

SIGNIFICANT ITEMS SINCE PRIOR INSPECTION:

On 9/13/2015 DEQ received a pollution emergency release report. There was a pump seal failure with about 80 gallons to ground spilled. Per Todd it happened on weekend and was found on Sunday. This was addressed and corrected promptly.

In 2016 MPL submitted a Rule 201 exemption proposal under Rule 285 (b) and installed Geodome roofs on 5 of 6 External Floating Roof Tanks, 705, 706, 708, 709, and 710. (Correspondence is in file). These Tanks are permitted and pre-date NSPS Subpart Kb.

In 2015 Internal Floating Roof (IFR) Tank 711 underwent the NSPS Kb required 10-year inspection 40 CFR 60.113b(a)(4). On 4/18/2017, IFR Tank 712 underwent its 10-year inspection.

RECORDKEEPING: Todd explained their operating system is referred to as SAP and is used country-wide. As a company they are focused on Pollution Prevention for waste, air, water, etc... I observed that Marathon had on site and available both hard copy and/or electronic versions of their record keeping, current and historic, depending on the specific record requested.

Todd pointed out that MPL emissions have greatly reduced, especially since installation of the Geodome roofs. While they use the Tanks program they are aware emission factors may have changed and MPL continues to be conservative in their emissions estimates. He indicated they are currently reviewing the possibility of revising their current permit to obtain a Minor source category due to a significant reduction in overall VOC and HAP emissions.

I obtained copies of the following PTI and/or NSPS required record keeping (See Attached to this Report to file):

- Rolling 12 Month Emissions & Throughput Summary : August 2016 through July 2017 (VOC and HAPs)
- Tank TVP Summary: August 2016 through July 2017 (Tank throughput gallons & True Vapor Pressure)
- Permit Limit Summary
- Tank 711, 712 Inspections March/Aug 2015, 2016, 2017
- Tank Roof, Deck, Seal Information and Comprehensive Inspection Form (Tank 712)

Facility -wide (Tanks & Fugitives) Total VOCs as of 12 months rolling period ending July 2017 = 16,547.62 lbs (8.27 Tons)

Facility-wide Total HAPs (same as above) = 620.35 lbs (0.310 Ton)

All Tanks Throughput (same as above) = 911,784,216 gallons

Fuel Types stored: Crude Oil, RVP 03 through 10, Gasoline.

Records indicate compliance with PTI No. 224-96D

COMPLIANCE INSPECTION

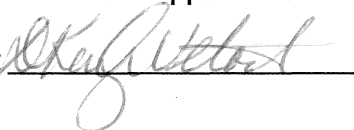
Safety equipment needed: hard hat, safety glasses, steel toe shoes, gloves (recommended for climbing up stairs with hand rails) and MPL recommends Fire Retardant (FR) clothing. FR clothing is mandatory for employees and contractors to walk around tanks. It is recommended but optional for visitors, you are therefore at your own risk. MDEQ AQD to my knowledge has not provided FR clothing to all staff however it may be available for those with such inspection requirements. By scheduling ahead I was able to request MPL FR coveralls so that I was able to enter area around tanks and climb to the roof of a tank.

Todd and Ray accompanied me during the facility inspection. We walked past the pipe line pumping transfer area and the FGTANKFARM. I observed all visible pipeline structures appeared to be in good condition. I observed Storage Tanks and containment from a distance and they all appeared to be in good condition externally. We climbed to the top of Tank 706 which was operational and contained crude. The Geodome roof was verified on this and the other tanks. From this height I was able to verify that Tank 707 was emptied. I was also able to view the Cone external roofs on the two larger, newer tanks 711 and 712.

COMPLIANCE SUMMARY

AQD determined that Marathon Pipe Line, LLC Samaria appears to be in substantial compliance with federal and state applicable requirements at this time. I observed that regular operation and maintenance is occurring and documented. I also verified MPL is maintaining all records required by PTI No. 224-96D and appears to be in compliance with emission limits and material throughput limits.

NAME



DATE

8/31/17

SUPERVISOR

