

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

B903624757

FACILITY: BUCKEYE PIPE LINE HOLDINGS, L.P.- TAYLOR TERMINAL		SRN / ID: B9036
LOCATION: 24801 E CORSE RD, TAYLOR		DISTRICT: Detroit
CITY: TAYLOR		COUNTY: WAYNE
CONTACT: Steven Fusco , Supervisor		ACTIVITY DATE: 04/01/2014
STAFF: Terseer Hemben	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: VOC		
RESOLVED COMPLAINTS:		

INSPECTED BY : Terseer Hemben, MDEQ  
 PERSONNEL PRESENT : Steven A. Fusco – Supervisor  
 FACILITY PHONE NUMBER : (313)-292-4030  
 FACILITY FAX : (313) - 292-9616  
 DATES OF INSPECTION : 04/1/2014  
 SRN: B9036

**FACILITY BACKGROUND: BUCKEYE TAYLOR TERMINALS, LLC**

Buckeye Terminals, LLC currently supplies Jet fuel to Detroit Metropolitan Airport. Buckeye has been operating only in Jet fuel. The facility discontinued gasoline distribution operation since 2006.

**COMPLAINT/COMPLIANCE HISTORY:**

Buckeye Terminals, LLC (BT, LLC) has not been a source of citizen air quality complaints since the last annual inspection.

**OUTSTANDING CONSENT ORDERS:**

None

**OUTSTANDING LOV'S:**

None

**OPERATING SCHEDULE/PRODUCTION RATE:**

The facility operates 24 hours per day, 365 days per year.

**PROCESS DESCRIPTION:**

The Buckeye Terminal is a loading facility for commercial tank trucks. The terminal loads products from bays 1 and 2, 3 and 4. Bay 5 and 6 load No. 2 oil and Additives. Currently, additives are received into the tank farms via trucks. Petroleum products are received into Tank farm and distributed to the Metro Airport via pipeline.

The original loading system design allowed all trucks to be loaded through the intake hose located at the bottom of the tank. Slop mixtures of different petroleum distillates from the pipeline are directed to the slop tanks (8-11). The slop is trucked to CITGO Terminal in Toledo and then transferred to a Buckeye refinery in Pennsylvania for product separation. There has been no gasoline product dealing at the loading facility. The quantity of Transmix product of volatile component loaded fell below 5 million gallons per year; hence the VRU was no longer needed for the VOC emissions control operation. The VRU was disengaged and its operation discontinued.

**EQUIPMENT AND PROCESS CONTROLS:**

The Table listing active capacities of tanks and equipment at the Buckeye Terminals facility were reflected in the records attached [Pages 1 through 12].

#### INSPECTION PROCEDURE:

I arrived at the 24801 Ecorse address of the Buckeye terminal, Taylor at 1100 hours. The purpose of visit was to conduct annual compliance evaluations of the petroleum storage and distribution facility. According to the Weather Underground weather history, Temperature at the hour was 59.0 F with wind speed 20 mph coming from the SSW direction. I met with Mr. Fusco, the terminal Supervisor. We held a pre-inspection conference. During the conference interview, I learned that Buckeye terminal at Taylor had not made changes to process in the last 24 months except maintenance and parts enforcements. The Company stored and distributed Jet fuel at the terminal using truck loading at the maximum fleet rate. Bulk of the distribution was done through pipeline transportation. Buckeye Terminal stores Transmix at the site in a small size tank.

I observed the tanks and associated above-ground piping appeared to be in good condition. We toured the tank farm and returned to the control room to review monitoring and keeping of operation records as part of post inspection interview. Records pertaining to the maintenance of the process were requested to be downloaded from the central computer files and mailed to AQD. The requested records were sent in on 04/14/2014.

While inspecting the facility, I examined the premises for the presence of open containers holding organic liquids that could generate odors. No open containers holding organic liquid were detected. Similarly, there was no unpleasant odor detected at the facility premises. Summarily, the following records were obtained from Buckeye:

- Storage tanks maintenance receipts and emissions for the last 12 months.
- Loading Rack emissions

#### APPLICABLE RULES/PERMIT CONDITIONS:

Permit numbers 558-95 through 559-95 Special Conditions:

Based on the observations made and review of records during the 2014 annual inspection, the AQD Inspector determines the Buckeye Terminals Taylor facility, in reference to requirements of the permits listed in this document:

1. In compliance – Buckeye Terminal Taylor (BTT) stated there had been some maintenance work on Three tanks in the last 12 months, but no modification was made:
2. In compliance – BTT indicated there has not been any modification to the Loading system in the last 12 months.
3. In compliance the BTT indicated there has not been any modification to the Delivery Equipment and procedures.
4. In compliance – BTT demonstrated the VOC emission rate from the loading rack did not exceed 36.9 tons per year based on a 12 month rolling time period as determined at the end of each calendar month. Records submitted indicated the maximum VOC emissions from loading rack was 5.51 tpy; and the highest emissions from storage tanks was 7.11 tpy (note: Tank #8 was out of service) based on a 12-month rolling time period. (Records listed in Page-12 are attached)
5. In compliance – the BTT demonstrated the hazardous air pollutant (HAP) emission rate from the loading rack did not exceed 5.24 tons per year based on a 12 month rolling time period as determined at the end of each calendar month and determined using EPA methods and calculations (S.C. 16). Records submitted indicated the highest emissions of HAP from Storage tank was 0.08 tpy [Summary, Page 12].
6. In compliance – the BTT indicated the HAP emission from storage tank was 0.017 tpy. Records of Storage tank emissions for the last 12 months are attached [Summary, Page 2].
7. In compliance – The BTT demonstrated that Tanks #4 and #7 with internal floating roofs used liquid mounted primary seals and Tank #6 used a vapor mounted primary seal with secondary seals [SC 16]. BTT responded that over the last several years the terminal was transformed from gasoline into a distillate terminal.

(a) Tanks #4 and #7 currently contain rollers to keep the roof centered. No seals were present.

(b) In compliance - Tank #6 used primary stainless steel mechanical wiper seals rather than primary and secondary seals.

