

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

B907426395		SRN / ID: B9074
FACILITY: MARATHON PETROLEUM CO-JACKSON		DISTRICT: Jackson
LOCATION: 2090 MORRILL RD, JACKSON		COUNTY: JACKSON
CITY: JACKSON		ACTIVITY DATE: 07/10/2014
CONTACT: Johnathon Kocher , Terminal Manager		SOURCE CLASS: SM OPT OUT
STAFF: Sersena White	COMPLIANCE STATUS: Compliance	
SUBJECT: Unannounced targeted inspection conducted at this bulk loading terminal.		
RESOLVED COMPLAINTS:		

SRN: B9074

Company Name: Marathon Petroleum Company

Company Address: 2090 Morrill Road, Jackson, MI 49201

Company Contact: Jonathan R. Kocher – Terminal Manager

Additional Company Contact: Kimberly Crame- Environmental Professional – Michigan Terminals

Company Contact E-mail: JRKocher@MarathonPetroleum.com, kcrame@marathonpetroleum.com

Introduction: Marathon Petroleum is a petroleum product distribution terminal consisting of ten above ground storage tanks with internal floating roofs and a truck loading rack controlled by a vapor recovery unit. The tanks are large enough to require a permit to install and are subject to 40 CFR 60 Subpart A – General Provisions, K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978, and Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. There are also four Rule 201 exempt tanks (two are contain additives and two are for waste water) on site, but they are also included in the permit to install. The facility is subject to 40 CFR 63 Subpart A – General Provisions and Subpart BBBBBB – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. All of the incoming petroleum products are transported to the tanks by the Wolverine Pipeline, except for Ethanol which is delivered by truck.

Purpose: Marathon was last inspected on September 24, 2010 and was due for a targeted scheduled inspection. The facility has an Opt Out permit 157-08B, which provides enforceable requirements to keep them from being subject to the Title V Renewable Operating permit program. I arrived at approximately 1:24 p.m. at the gate and had to use the intercom to identify myself and my purpose in being there, before the gate was opened. After parking in the visitor's area, I was met by Jonathan the Terminal Manager. I introduced myself and we discussed the required personal protection equipment (PPE) necessary for the inspection. The required PPE are: Hard hat, safety glasses with side shields, steel toed boots/shoes, long sleeve shirt, and fire retardant clothing from neck to ankles. I had everything except the fire retardant covering, which was provided before we walked through the loading rack and tank farm.

Inspection: I gave him an inspection brochure and pointed out the survey link on the back. I explained that we would begin by discussing the requirements of the permit, primarily record keeping, before going outside to make observations. Then we would conclude with an assessment of compliance before leaving. We went to an office and began covering the required records that were to be kept. With the assistance of Kimberly Crame, Jonathan was able to provide all of the records showing compliance with the permit limits. Those records are attached.

EULOADRACK: Two lane loading rack for loading petroleum product into tank trucks. The displaced vapors are controlled by vapor recovery unit (VRU) (primary) or a vapor combustion unit (VCU) (backup is trailer ready).

The loading rack has two different material throughput limits: 1) for gasoline, gasoline additives, Transmix and ethanol; 2) for distillate fuel and distillate additives.

The loading rack has restrictions on the physical equipment design and its operation during truck loading to ensure proper capture of volatile organic compound vapors and leak prevention. Procedures are posted, truck drivers are trained, and trucks must be certified as having been vapor tested prior to loading product. Rule 627 addresses the requirements for delivery vessels with vapor collection systems. The equipment requirements of the loading rack are verified by daily inspections and lock out procedures for each truck to be loaded. The company must maintain a malfunction abatement plan (MAP) for the loading rack and update it as necessary. The date of the current MAP on file is June 23, 2013. Rule 706 addresses the requirements for the loading of delivery vessels with volatile organic compounds having a true vapor pressure of more than 1.5 psia at new loading facilities handling 5,000,000 or more gallons of such compounds per year.

The permit has a special condition citing that the vapor recovery unit may be required to be tested. The last time the VRU was tested was on November 17, 2010. The results met the requirements. The company is required to log all VRU outages and not allow loading of any organic compounds having a true vapor pressure of more than 1.5 psia during outages. The company must also monitor and record the VRU outlet VOC concentration on a monthly basis. The VRU is equipped with a high temperature alarm which when triggered will shut down all loading from the rack.

The loading rack is equipped with meters for measuring the amount of gallons of each fuel loaded into trucks. The meters are calibrated four times per year.

EUTRANSMIXTANK: Internal floating roof storage tank, T-1

The only requirement for this storage tank is a throughput limit and to keep records of the throughput on a monthly and 12-month rolling time period.

Transmix is the only pre-blended product available from the loading rack. The other grades of gasoline are blended at the gas station. Transmix does not come through the distribution system as Transmix. By definition, Transmix is a mixture of gasoline and diesel fuels that result from the various sources at the terminal. It also includes ethanol since it is received by truck and distributed by truck.

EUGASOLINEADDTK: Gasoline additive storage tank, identified as AA-10-2

The only requirement for this storage tank is a throughput limit and to keep records of the throughput on a monthly and 12-month rolling time period. Another additive tank identified as AA3-5 was installed under the Rule 284 exemption. It has a capacity of 3,000 gallons.

FGIFRTANKS: All storage tanks with internal floating roofs. EUTANK25-5, EUTANK40-6, EUTANK55-7, EUTANK55-8 and EUTANK55-9

These tanks have a single throughput limit and process and operational requirements identified in the New Source Performance Standards (NSPS) Subpart A and K for EUTANK25-5, EUTANK55-9 and Subpart Kb for EUTANK55-7 and EUTANK55-8, respectively. Both of these regulations require the keeping of records of tank inspections and operating information on file. Jonathon explained that the tank identifications first number represents the size of the tank by number of barrels it can hold.

FGWASTEWATERTKS: Two wastewater tanks identified as EUTANKWA-10-1 and EUTANKWA-10-2

In follow up with Kimberly, the source of the petroleum contact water in the waste water tanks comes primarily from storm water that enters their trench drains under the loading rack. The loading rack has a canopy but rain and snow can still enter into this area and would be directed into the trench drains. The Jackson Terminal ships contact water off-site about quarterly, depending on precipitation. The permit required that the collected waste water be tested to evaluate the hazardous air pollutants and volatile organic compound concentrations so that the emissions could be included in the facility wide emission calculations. The size of both tanks are 10,474 gallons which are exempt under Rule 284(i) – Storage or transfer operations of volatile organic compounds or non-carcinogenic liquids in a vessel that has a capacity of not more than 40,000 gallons where the contents have a true vapor pressure of not more than 1.5 psia at the actual storage conditions. The waste water in the tanks was tested and showed results of the Reid vapor pressure being less than 1.5 psia. According to Kimberly, this facility is the only one in the State of Michigan with this requirement.

FGFACILITY: The pollution control equipment for this flexible group is a vapor recovery unit or a vapor combustion unit for the loading rack.

There are emission limits for VOC, each individual HAP and aggregate HAPs at levels that provide the facility with Opt Out limits to avoid Title V requirements. The records provided show that the emissions are well below the limit and they also track the emissions on a monthly percentage basis to compare with 12 month rolling limit quickly.

The facility is subject to 40 CFR 63 Subpart A and Subpart BBBBBB for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. What makes them subject is having a throughput of more than 250,000 gallons of gasoline per day.

Conclusion: Based upon the site inspection and review of the records, Marathon Petroleum is complying with the requirements of permit to install 157-08B. I left the facility at approximately 3:33 p.m.

Attachments: Records received during the time of the inspection and follow-up via e-mail. Marathon Visitors Information Guide

NAME Lucretia White

DATE 8-13-2014

SUPERVISOR 

