

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

B908126233

FACILITY: Buckeye Terminals, LLC - Flint Terminal		SRN / ID: B9081
LOCATION: G-5340 N DORT HWY, FLINT		DISTRICT: Lansing
CITY: FLINT		COUNTY: GENESEE
CONTACT: Donald Padget , Lead Terminal Operator		ACTIVITY DATE: 07/28/2014
STAFF: Brian Culham	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: This was a scheduled inspection that also completes a Full Compliance Evaluation (FCE). The inspection was unannounced and was for the purpose of determining compliance.		
RESOLVED COMPLAINTS:		

Donald Padget II, Lead Terminal Operator, dpadget@buckeye.com

This was a scheduled inspection that also completes a Full Compliance Evaluation (FCE). The inspection was unannounced and was for the purpose of determining compliance.

The terminal is located past the north city limit of Flint in Genesee Township. An Industrial Park is located immediately east of the terminal. To the north the land use becomes more agricultural and recreational, but still contains commercial properties. To the south is commercial and light industrial. A mobile home park is located ½ mile north. A school and residential areas is located ½ mile south east. The Flint River is about 1 mile east of the terminal. To the west is a mixture of residential, commercial and vacant industrial.

The area has a history of environmental justice complaints filed with the EPA.

Buckeye Terminals acquired this facility from Exxon/Mobil. Our files previously indicated Mobil as the operator.

Several different fuel companies receive fuel from the terminal for distribution to various stations in the area. Gasoline and diesel are delivered through a pipeline into the facility from a refinery, stored in storage tanks, and recovered from storage through loading racks into delivery trucks. Some fuel companies have specific additives. Buckeye operates the terminal but owns very little of the stored fuel. By definition Buckeye is a "Bulk Gasoline Terminal".

Permit 138-05B includes restrictions on facility wide emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAPs) to maintain Buckeye as a "Synthetic Minor" source for Title V purposes.

Buckeye reports emissions to MAERs annually and pays air use fees.

No.	Emission Unit or Flexible Group	Description	Permit Number or Exemption	Comp. Status
1	FGIFRTANKS	5 - Internal Floating Roof Tanks. #1, #2, #4, #10, #15. Used for gasoline	PTI 138-05B 40 CFR 60 (NSPS) sub A and K(b) 40 CFR 63 (MACT) sub BBBB	C C C
2	EUGASFOLOAD	Loading rack equipped with a Zink vapor recovery unit as primary, and vapor combustion unit as backup.	PTI 138-05B	C
3	FGVFRtanks	Vertical Fixed Roof Tanks #3, #9. Used for Fuel Oil.	Rule 284(d) Exempt	C
4	FGAdditiveTanks	Approx. 10,000 Gallon tanks used for additives. #6, #7, #8, #12, #11, #13, #14	Rule 284(i) Exempt	C
5	EUTransMix	Horizontal Tank #5 -30,000 gal.	Grandfathered	C

I arrive at 8:30. No odors were noted upon plant entry. I met with Donald Padget II, Lead Terminal Operator. I showed my credentials and gave him the inspection brochure. I have not been to this facility in over 15 years.

8/5/2014

1. & 3. FGIFRTANKS and FGVFRTanks

We walked out into the tank farm. There are 5 vertical IFR tanks ranging in size from 0.34 million gallons to 2.77 million gallons. They all store gasoline except the smallest which can store ethanol. Two more large tanks store fuel oil. Several smaller tanks store fuel additives and transmix (slop).

Dikes were constructed around the large tanks. We followed some of the piping. The pipes are checked daily for leaks or other repair issues. D. Padget stated that visual leaks are easily detected because of bubbling or residue at the leak. Odor is also used to determine an area to search. A faint smell of fuel was noted in one area. D. Padget identified the possible source as the vent from the space above the floating roof. The odor dissipated immediately. Without seals the odor would be constant and quite strong. No other odors were detected.

2. EUGASFOLOAD (EULOADRACK)

Buckeye has 1 loading rack, with 4 loading bays. Each trucker must card in and type a code to access the loading system. All lines must be properly attached for loading to begin. Trucks are equipped with overflow/overpressure sensors which must also be connected to the system.

D. Padget showed me where records are kept for maintenance and visual inspections. He stated that visual inspections are made twice daily. Leaks are best detected with the nose, but air displacement can also be experienced by touch. Components are usually replaced prior to failure.

I identified the Vapor Recovery Unit (VRU). It was operating the entire time I was there. The unit turns on whenever a truck begins loading at the racks. Yellow painted pipes recovering vapor from the load out racks can be clearly traced to the VRU. A remote computer system manages the VRU. I followed the lines from VRU to a truck. Gasoline odors were nearly undetectable. No leaks were detected.

D. Padget explained the "Penguin" system to me. Electronic data is monitored for the VRU and is automatically input into the system. Maintenance and other human observations can be input at a terminal as well. Dixon Environmental manages the data and prepares the necessary emission reports. D. Padget gave Stefan Weavers phone, 610-722-9444 ext. 16; and e-mail, sweaver@dixonenvironmental.com, to me. He is the Dixon contact for this terminal.

If maintenance is required on the VRU, a vapor combustion unit (VCU) is used as backup. Monitoring can determine VOC concentrations out of the combustion unit stack. I identified instrumentation for controls and monitoring. Because the VRU was operating the VCU was not. The VCU was tested on 8/27/09 and was well below the allowable permit VOC concentration limit.

4. & 5. FGAdditiveTanks and EUTransMix

Smaller vertical and horizontal tanks are scattered around the facility to store the specific additives required by the distributors. The tanks are less than 40,000 gallons in size.

Transmix, an off specification mixture of gas and fuel oil, is also stored in a smaller tank. Past activity reports have identified this tank as grandfathered.

I left at 10:00 am.

A 73 page record report was submitted with MAERS. Records indicated that at the end of December 2013 the total rack throughput was 250 million gallons; the limit is 375 million gallons. The facility is also allowed to emit up to 94.2 TPY of VOC, but reported only 27 TPY for 2013.

NAME 

DATE 8-5-2014

SUPERVISOR 