

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

B908162562

<b>FACILITY:</b> Buckeye Terminals, LLC - Flint Terminal		<b>SRN / ID:</b> B9081
<b>LOCATION:</b> G-5340 N DORT HWY, FLINT		<b>DISTRICT:</b> Lansing
<b>CITY:</b> FLINT		<b>COUNTY:</b> GENESEE
<b>CONTACT:</b> Kimberly Trostel , Sr. Specialist, Air Compliance		<b>ACTIVITY DATE:</b> 04/11/2022
<b>STAFF:</b> Daniel McGeen	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> PCE activities, conducted as part of a FCE: 1. Unannounced, scheduled joint inspection with EPA Region % and AQD, and 2. Review of facility recordkeeping.		
<b>RESOLVED COMPLAINTS:</b>		

On 4/11/2022, the United States Environmental Protection Agency (EPA) and the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an unannounced, scheduled inspection of Buckeye Terminals, LLC - Flint Terminal. This was done as part of EPA's initiative to inspect facilities in the community of Flint. AQD also subsequently reviewed facility recordkeeping.

The above partial compliance evaluation (PCE) activities were done as part of a full compliance evaluation (FCE).

**Facility environmental contacts**

- Kimberly J. Trostel, Sr. Specialist, Air Compliance; 419-993-8003; [KTrostel@buckeye.com](mailto:KTrostel@buckeye.com)
- Jessalyn Golightly, Specialist, Air Compliance; 937-401-4156; [JGolightly@buckeye.com](mailto:JGolightly@buckeye.com)

**EPA Region 5 Air Enforcement and Compliance Assurance Branch contacts:**

- David Sutlin, Environmental Engineer; 312-353-8990; [sutlin.david@epa.gov](mailto:sutlin.david@epa.gov)
- Brittany Cobb, Environmental Engineer; 414-517-8363; [cobb.brittany@epa.gov](mailto:cobb.brittany@epa.gov)

**EGLE, AQD contacts:**

- Dan McGeen (myself), Environmental Quality Analyst; 517-648-7547; [mcgeend@michigan.gov](mailto:mcgeend@michigan.gov)

**Facility staff, during the inspection:**

- Chris Betts, Field Operator for the terminal, peipeline station, & pipeline; cell phone: 313-549-1443
- Andy Schroeder, Field Operator
- Ken, Technician
- Josh, trainee

**Permitted emission units under Permit to Install (PTI) No. 138-05D:**

Emission Unit* ID	Emission Unit Description (Including Process)	Flexible Group** ID	Compliance Status

	Equipment & Control Device(s))		
EU00001	Storage Tank #1 – 2,769,784 gallon gasoline/ethanol/distillate tank with internal floating roof (IFR).	FGIFRTANKS	Compliance
EU00002	Storage Tank #2 – 842,732 gallon gasoline/ethanol/distillate tank with IFR.	FGIFRTANKS	Compliance
EU00004	Storage Tank #4 – 1,909,798 gallon gasoline/ethanol/distillate tank with IFR.	FGIFRTANKS	Compliance
EU00007	Storage Tank #10 – 336,000 gallon gasoline/ethanol/distillate tank with IFR.	FGIFRTANKS	Compliance
EU00009	Storage Tank #9 – 1,024,800 gallon gasoline/ethanol/distillate tank with IFR. This is subject to NSPS Kb.	FGIFRTANKS	Compliance
EU00010	Storage Tank #15 – 2,571,339 gallon gasoline/ethanol/distillate tank with IFR. This is subject to NSPS Kb.	FGIFRTANKS	Compliance
EULOADRACK	Loading rack equipped with a vapor recovery unit (VRU) as primary and vapor combustion unit (VCU) as backup.	NA	Compliance

**\*An *emission unit* is any part of a stationary source which emits or has the potential to emit an air contaminant.**

**\*\*A *flexible group* is used in a permit to install (PTI) or Renewable Operating Permit (ROP) to combine two or more emission units that have common or identical requirements.**

**Permitted emission units and federal regulations:**

Emission Unit	MAERS Emission Unit ID	Emission Unit Description	Permit to Install (PTI) No.	NSPS-subject?	NESHAP BBBB subject?***	Compliance Status
EULOADRACK	EULOADRACK	Truck loading rack, with VRU & VCU	138-05D	No	No	Compliance
EU00001	EUTANK1	IFR, gasoline/ ethanol/ distillate	138-05D	No	Yes	Compliance
EU00002	EUTANK2	IFR, gasoline/ ethanol/ distillate	138-05D	No	Yes	Compliance
EU00004	EUTANK4	IFR, gasoline/ ethanol/ distillate	138-05D	No	Yes	Compliance
EU00007	EUTANK10	IFR, gasoline/ ethanol/ distillate	138-05D	No	Yes	Compliance
EUTANK9	EUTANK9	New IFR, gasoline/ ethanol/ distillate	138-05D	Yes, Subpart Kb	Yes	Compliance

EU00010	EUTANK15	IFR, gasoline/ ethanol/ distillate	138-05D	Yes, Subpart Kb (built 1995)	Yes	Compliance
Tank 11	EUTANK11	Exxon diesel additive	903-91	No	No	Compliance

\*\*\*AQD does not have delegation of authority from EPA for Subpart BBBB.

Exempt or grandfathered emission units:

MAERS Emission Unit ID	Emission Unit Description	Contents	Michigan Air Pollution Control (MAPC) exemption rule, or grandfathered	Compliance Status
EUTANK3	Cone roof, submerged fill	Ultra Low Sulfur Diesel (ULSD)	Grandfathered (1959)	Compliance
EUTANK5	Horizontal, submerged fill	Breakout	Grandfathered (1959)	Compliance
EUTANK6	Horizontal, submerged fill	XOM Additive HITEC 65016 Gasoline Additive	MAPC Rule 284(i)	Compliance
EUTANK7	Horizontal, submerged fill	Transmix	Grandfathered (1959)	Compliance
EUTANK8	Horizontal, submerged fill	Unused, clean/empty	MAPC Rule 284(i)	Compliance
EUTANK12	Horizontal, submerged fill	Generic gas additive MCC 0092	MAPC Rule 284(i)	Compliance

EUTANK13	Horizontal, submerged fill	BP Additive Invigorate-3	MAPC Rule 284(i)	Compliance
EUTANK14	Horizontal	Diesel additive: Adversity in summer, Adversity with Cold Flow in winter	MAPC Rule 284(i)	Compliance
EUTANK19	350 gal. steel tote at EULOADRACK	Red dye	MAPC Rule 284(2)(g)(i)	Compliance
EUTANK20	1,000 gal. additive tank	Diesel additive: Adversity in summer	MAPC Rule 284(2)(g)(i)	Compliance

**Facility description:**

Buckeye Terminal is by definition a "Bulk Gasoline Terminal". 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.

**Regulatory overview:**

This facility has an opt-out or synthetic minor permit, Permit to Install (PTI) No. 138-05D, which limits its potential to emit (PTE) for volatile organic compounds (VOCs), and hazardous air pollutants (HAPs), to keep it from becoming a major source. VOCs are one of the *criteria pollutants*, that is, those pollutants for which a National Ambient Air Quality Standard (NAAQS) exists. Criteria pollutants also include carbon monoxide, nitrogen oxides, sulfur dioxide, lead, particulate matter smaller than 10 microns (PM-10) and particulate matter smaller than 2.5 microns (PM2.5). A facility is considered a *major source* if it has the PTE of 100 tons per year (TPY) or more of any one of the criteria pollutants. Because VOCs are the pollutant with the highest PTE here, the opt-out PTI sets restrictions to limit the PTE to levels below the major source threshold.

A facility is considered an area source, or minor source of HAPs, if it has a PTE of less than 10 TPY for single HAPs, and less than 25 TPY, for all HAPs combined. The opt-out PTI No. 138-05D limits this facility's PTE, to keep it from becoming a major HAPs source.

In addition to opt-out PTI No. 138-05D, there is a pre-existing PTI No. 903-91, for a 3,000 gallon additive storage tank, EUTANK11, owned by third party on Buckeye site.

**Note:** During the review of the recently issued opt-out PTI No. 138-05D, there was a determination by AQD Permit Engineer Marina Ostaszewski that this facility had never triggered 40 CFR Part 60, Subpart XX. Please refer to her Eval document for PTI 158-08D. The 2015 and 2019 AQD inspection reports which refer to the facility being XX-subject are therefore incorrect on this subject.

There are some storage tanks onsite exempted by Rules 284(i) and 284(2)(g)(i), along with some tanks which are grandfathered from permitting, because of their installation dates.

There are no solvent-based parts washers onsite, I have been informed, so there are no cold cleaners or vapor degreasers here subject to Michigan Air Pollution Control Rules 611-614 or 707-710.

The facility is subject to the following federal regulations:

- 40 CFR Part 60, Subpart Kb: *Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification occurred after 7/23/84, for EUTANK15.*
- 40 CFR Part 63, Subpart BBBB: *Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities*, for EUTANK1, EUTANK2, EUTANK4, EUTANK10, and EUTANK15. AQD does not have delegation of authority from the U.S. Environmental Protection Agency (EPA) for this area source Maximum Achievable Control Technology Standard (MACT).

#### Fee status:

This facility is classified as Category D fee-subject, because it is subject to a federal New Source Performance Standard (NSPS), Subpart Kb.

The facility reports to the Michigan Air Emissions Reporting System (MAERS) annually.

#### Location:

The facility is located on N. Dort Highway in a heavily industrialized area for approx. 2 miles from I-475 exit 9, north to East Coldwater Road. The Buckeye Terminal is located in the northern portion of this industrial area. Residential areas are located just over ½ mile to the north, less than ½ mile to the west, ¾ mile to the south, and south-west, with sporadic homes to the east near CS Mott Lake.

This facility is located in an environmental justice (EJ) area, on the north side of Flint. AQD staff evaluated the area, during the writing of this report, by using the United States Environmental Protection Agency's USEPA's EJScreen: Environmental Justice & Mapping Tool (Version 1.0). The surrounding area, within a 1-mile radius, ranks higher than state, EPA Region 5, and national averages on a number of criteria which are Environmental Justice indicators. Please see the attached report: EJ Screen 1 0 2022\_09\_30.pdf

#### Recent history:

PTI 138-05D was issued on 5/10/2021. As stated in the Permit Eval by M. Ostaszewski:

*This application was to administratively change the recently permitted PTI 138-05C. As a result of Buckeye's inquiry of when to do the initial test for EULOADRACK, there was greater internal AQD discussion with other District inspectors and Permit Section staff. As a result of the internal AQD discussions, it was determined that the increased loading rack capacity as part of the PTI 138-05C project actually did not trigger an NSPS XX modification. This is because, as detailed in 40 CFR 60.14, the project did not increase the short term (hourly) limits. However, since the VOC loading limit was lowered from 35 to 30 mg/l, the AQD believes a test was still necessary to ensure the facility will comply with the new limit. In order to incorporate the changes, this PTI application was submitted.*

PTI 138-05C was issued on 8/4/2020, to modify Tank 9 (existing tank) from a fixed roof to an internal floating roof and increase the loading capacity through the loading rack for distillate by 100 MMgal/yr. It was voided on 5/10/2021, upon issuance of PTI 138-05D.

#### Recent previous inspections:

- 8/16/2019: Dan McGeen; no instances of noncompliance.
- 12/14/2016: CEMS test observation: Nathan Hude, no concerns.
- 12/17/2015: Nathan Hude, exemption question resolved. Concerns over MAERS tank sizes vs. permit tank sizes were addressed. Concern over proper reference to PTI 138-05B in MAERS pointed out. Tanks grandfathered vs. exempt were sorted out.
- 7/28/14- Brian Culham, no concerns noted.
- 8/20/10- Brad Myott, no concerns noted.
- 7/17/08- Brad Myott, no concerns noted.

**Recent violations:**

None.

**Recent stack testing:**

On 10/27 and 10/28/2021, the VCU and VRU, respectively, were stack tested. AQD Technical Programs (TPU)'s Trevor Drost and AQD Lansing District (LDO) staff (myself) were onsite to witness the stack testing, documented in separate activity reports. The test results showed compliance.

The last stack testing before that was said by former AQD inspector Nathan Hude to have been conducted 5/13/2012. MACES lists 5/31/2012 as the date of the most recent stack test for the VCU. The most recent RATA for the VRU CEMS was conducted on 12/14/2016, and witnessed by N. Hude. The results found the facility to be in compliance.

**Complaint history:**

None are on record, as far back as 6/10/1987. The plant file prior to this date was sent to the State of Michigan Records Center, some time ago.

**Safety apparel required:**

Safety glasses with side shields are required. Fire retardant coveralls are required if a tank is opened for work, so AQD staff should bring coveralls, in case they are needed. I wore a disposable paper mask, during the ongoing COVID-19 pandemic, out of personal preference. We had flame retardant clothing available, but were advised that is only required at the site when they are doing "hot work."

**MAERS Reporting**

**NAICS 493110- General Warehousing and Storage**

**Fee Category: D**

**2021 Reporting Year Emissions- VOC 21.8 tons**

**MAERS Emission Units:**

1. EU SpillsSpills and Releases01/01/2019
2. EUFUGITIVESFUGITIVE SOURCES AT FACILITY - VALVES, PUMPS, FLANGES, CONNECTORS, ETC.01/01/1959
3. EUGASFOLOADLOADING RACKS ASSOCIATED WITH DISTILLATE AND GASOLINE LOADING OF MOTOR VEHICLE TRANSPORT TRUCKS. ALL RACKS ARE CONSTRUCTED FOR THE SUBMERGED FILLING OF TRANSPORT TRAILERS.01/01/1959
4. EUTANK1STORAGE TANK #1 - GASOLINE - 2.499 X 10.6 WORKING GAL - 100' DIA. CONTROLLED BY INT. FLOATING ROOF W/PRIMARY SEAL AND SUBMERGED FILLING01/01/1959

5. EUTANK10STORAGE TANK #10 - ETHANOL - 0.336 X 10 6 WORKING GAL - 47' DIA. INT. FLOATING ROOF W/PRIMARY SEAL AND SUBMERGED FILLING.01/01/1939
6. EUTANK11STORAGE TANK #11 - GENERIC ADDITIVE; 3,000-GALL HORIZONTAL [01/01/1995
7. EUTANK12ADDITIVE STORAGE TANK #12 - 8,000 GALLON - HORIZONTAL W/SUBMERGED FILLING.10/01/1981
8. EUTANK13AMOCO ADDITIVE STORAGE TANK #13 - 8,000 GALLON HORIZONTAL ABOVE GROUND W/SUBMERGED FILLING.01/01/1981
9. EUTANK14ExxonMobil diesel additive; 6,000-gallon horizontal above ground storage tank01/01/1980
10. EUTANK15STORAGE TANK 15 - GASOLINE - 2.3478 X 10 6 WORKING GALLONS - 105' DIA CONTROLLED BY INT. FLOATING ROOF W/PRIMARY SEAL AND SUBMERGED FILLING.01/01/1995
11. EUTANK16BP Amoco diesel plus additive; 2,000-gallon horizontal above ground storage tank (empty/out-of-service in 2005)01/01/1980
12. EUTank17HT - Tank 17 Generic PCW Sump01/01/2001
13. EUTank18HT - Transmix Tank, 600 Gal01/01/1998
14. EUTANK19Diesel Additive Storage Tank, 350 gal Horizontal01/01/2011
15. EUTANK2STORAGE TANK #2 - TRANSMIX - 0.756 X 10 6 WORKING GAL - 55' DIA CONTROLLED BY INT. FLOATING ROOF W/PRIMARY SEAL AND SUBMERGED FILLING.01/01/1959
16. EUTANK20Diesel Additive Storage Tank, 1000 gals Horizontal11/27/2017
17. EUTANK3STORAGE TANK #3 -DISTILLATE; 1.95X10 6 GAL - 85' DIA - CONE ROOF DISTILLATE STORAGE - CONTROLLED BY SUBMERGED FILLING.01/01/1959
18. EUTANK4STORAGE TANK #4 - GASOLINE; - 1.785 X10 6 WORKING GAL - 85' DIA - CONTROLLED BY INT. FLOATING ROOF W/PRIMARY SEAL AND SUBMERGED FILLING.01/01/1959
19. EUTANK5STORAGE TANK #5 - SLOP OIL - 30,000 GAL HORIZONTAL 10' DIA X 47' LONG CONTROLLED BY SUBMERGED FILLING.01/01/1959
20. EUTANK6MOBIL ADDITIVE STORAGE TANK - 8,000 GAL HORIZONTAL ABOVEGROUND CONTROLLED W/SUBMERGED FILLING01/01/1981
21. EUTANK7STORAGE TANK #7 - SLOP OIL (TRANSMIX) - 25,000 GALLONS HORIZONTAL 11' DIA X 38' LONG - CONTROLLED BY SUBMERGED FILLING.01/01/1959
22. EUTANK8OWN-USE DIESEL STORAGE TANK #8 - 8000 GAL HORIZONTAL ABOVEGROUND W/SUBMERGED FILLING; EMPTY AND OUT-OF-SERVICE/PERMANENTLY CLOSED IN 2003.01/01/1981
23. EUTANK9STORAGE TANK #9 - DIESEL (DISTILLATE) STORAGE - 0.958 X 10 6 GAL 68' DIA W/CONE ROOF CONTROLLED BY SUBMERGED FILLING.

#### **Pre-arrival:**

**This was an unannounced inspection. It was part of EPA's community initiative to conduct inspections in Flint, during April 2022. Therefore, EPA Region 5 Air Enforcement and Compliance Assurance Branch staff and AQD LDO staff coordinated plans.**

**After doing various field activities in Flint, I met with AQD LDO inspector Julie Brunner, and EPA staff. EPA was represented by Environmental Engineers David Sutlin, Brittany Cobb, Valeria Apolinario, and Charlie Hall. J. Brunner, V. Apolinario, and C. Hall went to conduct an inspection elsewhere in the area, while D. Sutlin, B. Cobb, and I conducted an odor evaluation on our way to the Buckeye terminals, LLC - Flint Terminal.**

**We drove north on N. Dort Highway, past the terminal, east on Coldwater Road, south on Bray Road, and east on E. Carpenter Road. We drove north onto Energy Drive, then returned to E. Carpenter Road. AT the intersection with N. Dort Highway, we turned north onto Dort. No odors from the Buckeye Terminals, LLC - Flint Terminal could be detected. Weather conditions were partly sunny and 68 degrees F, with winds 10-15 miles per hour out of the southwest.**

#### **Arrival:**



As mentioned above, this was an unannounced inspection conducted by EPA and AQD. Participating EPA staff were Environmental Engineers David Sutlin and Brittany Cobb, and I represented AQD.

We arrived onsite at 1:54 PM. We identified ourselves at the gate, and explained the purpose of our visit. Buckeye Field Operators Chris Betts and Andy Schroeder opened the gate for us. No petroleum odors were detected by the gate. There were no visible emissions noted from the facility.

#### Pre-inspection meeting:

Once inside the onsite office, we had a pre-inspection meeting, where the goals of the inspection were explained.

Buckeye Terminals, LLC's Kim Trostel, Senior Air Compliance Specialist was unable to be here in person for the unannounced inspection, working in a different state, but joined by phone. She requested copies of any photos taken onsite. I took 2 photos of an overhead aerial image of the tank farm, which will be forwarded to K. Trostel.

EPA staff explained that they would like to use the FLIR camera, to check for the presence of VOC emissions from any leaks from equipment. Because this was not an intrinsically safe camera, it was explained that we would need a permit for it to be used onsite. C. Betts worked on filling out the permit for EPA staff to use the camera onsite.

Any images of emissions as recorded by the FLIR would be qualitative, rather than quantitative. It is my understanding that EPA was not making a compliance determination with the FLIR camera. .

AQD does not have delegation of authority from U.S. EPA for Subpart BBBBBB, as has previously been mentioned in this report. Buckeye reports to EPA and AQD, on a semi-annual basis, on compliance status.

We were informed there is 24-7 coverage here, and that there are 5 employees, with 1 supervisor who is onsite part of the time. The company Buckeye Terminals, LLC has 7,500 employees, and 122 fuel terminals, with more having been purchased.

We were told capacity for the terminal is:

- 110,000 barrels (bbls) for "sub-no lead," E-85-based sub-grade gas, which is mixed with ethanol to bring it up to grade
- 42,000 bbls for 91 octane gas
- 7900 bbls for ethanol
- 64,000 bbls ULSD storage
- 17,380 bbls trans-mix
- 2 tanks w/diesel additive for lubricity
- 3 tanks with gasoline detergent additives, one generic, one for BP, and one for Exxon Mobil

We were advised that everything except the ethanol and the additives comes to the terminal through pipelines.

Right now, Tank 3, a tank with a cone roof, was being filled by pipeline, we were told. We were advised it is the only one of the big tanks without an IFR. Tank 4 is said to be a practical twin, except that it has an IFR.

**B. Cobb inquired about inspections. We were told that:**

- Each tank is inspected monthly, with a sheet for each.
- Daily facility inspections are done, with a daily sheet.
- They visually check for leaks, looking for hydrocarbons in the form of a black residue or deposit.
- They check for odors.

**B. Cobb asked if there had been any leaks lately. We were told they were fixed before we got here, but that otherwise there had not been leaks for a long time. Tank 15 was said to have had a leak at a**

pressure relief valve, right by a pump, where a 3/8 inch line had a leak. This was said to have been reported, and GES was said to have conducted soil sampling.

### Inspection:

We did a walk through of the entire facility. With the unaided eye, no visible emissions could be seen from Tanks 1, 2, 3, 4, 9, 10, or 15.

#### FLIR camera use:

EPA's D.Sutlin and also B. Cobb used the FLIR camera on the tanks and pumps and other processes onsite. There was a small vapor leak on a vapor recovery line connection a truck being loaded at the west end of EULOADRACK.

A number of the IFR tanks, as seen through the FLIR camera high intensity setting, had vapor emissions coming out of the south or east vents at the top of the tank sides or from around the perimeter of the roof. The winds out of the west seemed to be pushing vapors from the west side of the tanks (above the IFR and the tank roof/ceiling) to the south or east sides. Emissions as recorded by the FLIR were qualitative, rather than quantitative.

David explained to Buckeye staff that they were not here to make a compliance determination, but they were concerned about the vapor leaks. My impression was that Buckeye staff had not thought there would be any vapors between the IFRs and the ceilings/roofs of the IFR tanks, but clearly vapors were getting pushed out by the wind. We went atop an IFR tank, to the stair platform at the top, and the FLIR did not detect any vapors up there, even when a small hatch was opened, though it had been expected that there could be vapors.

No violations were identified onsite by AQD. I left the site at 5:59 PM, and EPA preceded me by a minute or two, approximately.

Individual emission units are discussed in detail, below.

### EUTANK11; PTI No. 903-91:

Permit 903-91 was issued to Total Petroleum for a tank that is 3000 gallons in size. This is EUTank11, also identified as EU00016. This permit was originally issued for storage of the following as "major chemical components": Polyolefin amine 9003-53-6, Xylene (HAP) 1330-20-7, Ethylbenzene (HAP) 100-41-4, and Isooctyl alcohol 26952-21-6. EUTANK11 is now storing an Exxon diesel additive, as I understand it. There were no visible emissions or odors from the tank.

Based on EUTANK11's size and true vapor pressure (0.025 psi at 80°F per the permit app), AQD's Nathan Hude believed this tank is exempt from permitting per rule 284(i). It is at the discretion of Buckeye Terminals, LLC, whether they wish to void the permit in favor of using the exemption, or if they want to continue to operate under the permit. There are three Special Conditions (SC) in PTI No. 903-91, as follows:

PTI 903-91, Special Condition (SC) 14. VOC emissions shall not exceed 2 pounds per year.

**INSPECTION RESULT: NONCOMPLIANCE.** 3.74lbs of emissions were reported to MAERS for 2021. However, MAERS is not intended to be for compliance purposes, but for emissions inventory purposes. AQD emailed Buckeye's J. Golightly and K. Trostel on 9/30/2022, to verify if the 3.74 lbs reported to MAERS is accurate.

On 9/30/2022, K. Trostel sent an email, which read, in part, We did calculate 3.74 lbs of emissions for tank 11 in 2021. PTI 903-91 was issued in 1991 and since then we have updated the way we calculate

emissions. This would account for the change in lbs/yr. Also, Tank 11 would be exempt from PTI permitting according to the Michigan rules R 336.1284 (i). Buckeye will prepare and submit a request to revoke 903-91 based on this exemption.

*This is an acceptable path forward, and would resolve the violation. AQD's N. Hude noted in his 12/17/2015 inspection report that Tank 11 was capable of operating under the exemption, and he discussed voiding the PTI with the company contact at that time.*

PTI 903-91, SC 15. Applicant shall not substitute materials which would cause appreciable change.

**INSPECTION RESULT: COMPLIANCE.** *No materials are stored which are believed to cause appreciable change.*

PTI 903-91, SC 16. There shall be no visible emissions from the tank.

**INSPECTION RESULT: COMPLIANCE.** *No visible emissions were seen as we walked through the tank farm.*

#### **EULOADRACK; PTI No. 138-05D**

We were told there is a Scully System, a kind of safety system, to prevent trucks from being overfilled at the loading rack. When trucks are loaded, a recovery system routes vapors to the VRU or the VCU, as appropriate. We were told they make sure that product delivery lines are unhooked before the vapor recovery lines are unhooked from the trucks. We were advised it takes 5-45 minutes to load a truck.

The vapor recovery unit or VRU puts vapors under a vacuum, and truns them back to liquid, we were informed. This is the primary control device for EULOADRACK. The vapor combustion unit or VCU is the backup system, if there is a breakdown of the VRU or if maintenance is being performed on it. We were told that quarterly maintenance is done on both.

We observed an ethanol truck unloading. The VRU was not running, as unloading alone does not produce enough vapors to trigger the VRU. We also observed loading, subsequently, of a number of trucks. No visible emissions could be seen by the unaided eye, but the FLIR camera saw a small VOC leak, in a light-sensitive mode.

Compliance check with PTI 138-05D for EULOADRACK:

PTI 138-05D, EULOADRACK Special Condition (SC) II.1 limits product throughput to 375,000,000 gallons of petroleum products.

**INSPECTION RESULT: COMPLIANCE:** *From records (please see Flint\_permit\_compliance.pdf, attached) emailed to me on 9/27/2022 by Ms. Jessalyn Golightly, Air Compliance Specialist, as of April 2022, the month of the inspection, the 12-month throughput was 292,248,381.11 gallons. Therefore, the actual throughput was 77.93% of the allowable limit.*

PTI 138-05D, EULOADRACK SC III.2 requires a Malfunction Abatement Plan (MAP) which includes a list of common replacement parts, common repairs, and requires records of the rack control device malfunctions.

**INSPECTION RESULT: COMPLIANCE:** *AQD has a copy of the MAP. The MAP meets the requirements of the permit condition.*

PTI 138-05D, EULOADRACK SC VI.2 requires the permittee to keep records of the EULOADRACK throughput of each specific petroleum product for each calendar month and 12-month rolling time period.

**INSPECTION RESULT: COMPLIANCE.** *From records (please see Flint\_rack\_throughput\_rolling.pdf, attached) emailed to me on 9/27/2022 by J. Golightly, this is being done on a monthly basis and on a 12-month rolling basis.*

PTI 138-05D, EULOADRACK SC VI.3.a requires recordkeeping of parts replacement, repairs and maintenance for the loading rack control device as specified in the MAP.

**INSPECTION RESULT: COMPLIANCE.** *Please see attached 5-23-22 Buckeye Flint (BETWF VRU) PMI Checklist.pdf and 7-13-22 Buckeye Flint (BETWF VCU) PMI Checklist.pdf, emailed to me on 9/27/2022 by J. Golightly, per my 9/20 request.*

As mentioned earlier, EPA's D.Sutlin and also B. Cobb used the FLIR camera onsite. There was a small vapor leak on a vapor recovery line connection a truck being loaded at the west end of EULOADRACK.

#### **VRU for EULOADRACK:**

The VRU is the primary control system for the loading rack. We were told that if the VRU is not working, EULOADRACK cannot load, unless they manually close valves to the VRU, manually open the VCU valves, and allow the VCU to warm up to temperature.

We were given a very thorough overview of how the VRU works, during the pre-inspection meeting. There are 2 beds, which alternate. One is cleaned while the other is capturing VOC emissions. It is my understanding that bed 1 is the east bed, while bed 2 is the west one. Every 16 minutes, the beds are said to switch. The collected vapors are said to be washed, and condensed into gasoline.

A continuous emission monitor or CEM is used to monitor the outlet of carbon beds. We were told that the CEM does a daily self-calibration.

At 4:35 PM, the VRU was running, with no visible emissions to the unaided eye. Pressure was 0.14 psig to the carbon adsorber, under vacuum. According to the CEM, current emissions were :

- Instantaneous, as propane (C<sub>3</sub>H<sub>8</sub>): 0.00
- 1-hour average, as C<sub>3</sub>H<sub>8</sub>: 0.02
- 6-hour average, as C<sub>3</sub>H<sub>8</sub>: 0.01
- 24-hour average, as C<sub>3</sub>H<sub>8</sub>: 0.01

It is my understanding that the VRU receives a twice per day walk-around check, as well as and monthly and quarterly maintenance. I received a copy of the latest quarterly maintenance record for EULOADRACK from J. Golightly by email, please see attached.

It is my understanding that the VRU has thresholds for high temperature detection and hazardous gas detection, which would shut the plant down until operators could respond and fix the VRU, It is also my understanding that if operators were unable to fix the VRU, I was advised that they would call the third party contractor John Zink to make repairs, and operators would operate the plant with the VCU, meanwhile.

The current PTI 138-05D limits VOC emission to 30 mg / liter product loaded. This limit can only be checked during testing, as was done on 10/28/2021. The testing was based on averaging the loading of trucks until an amount of 300,000 liters (79,251 gallons) has been loaded in total. The testing procedure is outlined in 40 CFR Part 60, Subpart XX, *Standards of Performance for Bulk Gasoline Terminals* .

Pursuant to 40 CFR Part 63 Subpart BBBB, *Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities*, the facility is required to install and operate a Continuous Emission Monitoring System (CEMS). The CEMS is installed on the Vapor Recovery Unit (VRU) exhaust stack. If the VRU malfunctions, or is unavailable due to maintenance, the facility has a vapor combustion unit (VCU) as back up, to combust petroleum vapors.

Pursuant to 40 CFR Part 63 Subpart BBBB's Table 3, and Section 63.8(a)(2), a Relative Accuracy Test Audit (RATA) was done most recently on 12/14/2016. This was conducted on the CEMS. This was also done to certify the CEM, as required by Section 63.11092(b). Please see N. Hude's associated CEMS Test Observation activity report.. To be in compliance, the relative accuracy must be <10% regarding the relevant standard. Test results sent to AQD on 1/5/2017 showed that the unit passed, with results 0.82% RA<sub>AS</sub>, below 10%. Please see the section later in this report dedicated to Subpart BBBB.

Per N. Hude's 12/17/2015 inspection activity report, a Cylinder Gas Audit (CGA) on the VRU CEMS is required every 6 months. The purpose of the CGA is to challenge the CEMS with a known gas content to ensure the CEMS is reading and recording properly. CGA's and Excess Emission Reports (EER's) are not submitted to or logged in the AQD database.

#### VCU for EULOADRACK:

The VCU is the secondary control device for EULOADRACK, if the VRU is unavailble, due to maintenance or a breakdown. As mentioned above, we were told that if the VRU is not working, EULOADRACK cannot load, unless they manually close valves to the VRU, manually open the VCU valves, and allow the VCU to warm up to temperature.

We were told the VCU is an enclosed flare. Louvres on the side of the stack allow air in. The temperature of the fire is said to be monitored, and EULOADRACK is unable to load if the temperature does not meet a certain minimum.

#### FGIFRTANKS; PTI No. 138-05D:

##### Background:

The following is a comparison between the earlier permit PTI 138-05B and MAERS for FGIFRTANKS:

Permit EU	MAERS EU	Permit Size	MAERS Size	Difference	*Working
EU00001	EUTANK1	2,769,784	2,550,000	-219,784	2,499,000
EU00002	EUTANK2	842,732	750,000	-92,732	756,000
EU00004	EUTANK4	1,909,798	1,890,000	-19,798	1,785,000
EU00007	EUTANK10	336,000	350,000	+14,000	336,000
EU00010	EUTANK15	2,571,339	2,520,000	-51,339	2,347,800

An email was sent by AQD's N. Hude on 1/25/16 to Buckeye's Ms. Lee Beck asking for the correct sizes. A response was received on 2/8/16 from Ms. Kimberly Trostel, these sizes are identified as the "\*Working" column, above. Corrections to MAERS will be made as appropriate, N. Hude noted. Because the combined difference in these tanks are +336,200, so Buckeye is over reporting it's emissions, somewhat.

Please note that the 7/18/2019 Semi-Annual Compliance Report for 40 CFR Part 63, Subpart BBBBBB, from Buckeye Terminal identifies the following tank capacities, which do not completely match the above.

- Tank 1, IFRT, storage capacity 2,797,200 gallons
- Tank 4, IFRT, storage capacity 2,016,000 gallons
- Tank 10, IFRT, storage capacity 428,400 gallons
- Tank 15, IFRT storage capacity 2,591,400 gallons

On 9/10/2019, I emailed Ms. Trostel, to ask for input as to which figures are most accurate. She advised me that : *Tanks can have many different capacities depending on how you ask the question. There is a aworking capacity that takes into acoount the high levels and vents at the tope of the tank and subtracts that quantity. There is a shell capacity that does not take this into account. There is also the measured quantity that comes from the measurements taken on a tank before it is put into service.*

For the differences I described, Ms. Trostel indicated on 9/11/2019 that it looks like Buckeye Terminals, LLC is using the shell capacity on the Subpart 6B reports and the working capacity in the 2015 activity report reference.

**PTI 138-05D compliance check for FGIFRTANKS:**

The flexible group FGIFRTANKS, consisting of the emission units EU00001, EU00002, EU00004, EU00007, EU00009 and EU00010, requires compliance with rules 604, 607, and 627 per SC III.1 and 2.

Rule 604 refers to storage of organic compounds having true vapor pressure of more than 1.5 psia, but less than 11 psia, in existing fixed roof stationary vessels of more than 40,000-gallon capacity. After 4/30/1981, it is unlawful to store an organic compound with a VP >1.5<11 psia at actual conditions of vessels >40,000 unless they meet 1 of the following: a) tank is capable of withstanding pressure to prevent vapor loss, b) vessel is equipped with a floating roof, c) vessel is equipped with a vapor recovery system. EU00001, EU00002, EU00004, EU00007, and EU00010 are compliant by this rule by use of an internal floating roof, 604(1)(b). I did not confirm compliance with paragraph (2) of this rule as per the following:

604(2) All openings, except stub drains, in any stationary vessel subject to the provisions of this rule shall be equipped with covers, lids, or seals so that all of the following conditions are met:

- (a) The cover, lid, or seal is in the closed position at all times, except when in actual use.
- (b) Automatic bleeder vents are closed at all times, except when the roof is floated off, or landed on, the roof leg supports.
- (c) Rim vents, if provided, are set at the manufacturer's recommended setting or are set to open when the roof is being floated off the roof leg supports.

**Rule 607 is in regards to loading gasoline into existing stationary vessels of more than 2,000-gallon capacity at loading facilities.**

**Paragraph (1): After June 30, 1980, it is unlawful for a person to load, or allow the loading of, gasoline from a delivery vessel into any existing stationary vessel of more than 2,000-gallon capacity located at a gasoline-loading facility in any county listed in table 61-a, unless the stationary vessel is equipped with a permanent submerged fill pipe.**

Genesee County is listed in table 61-a, yet gasoline is delivered via pipeline. Per R336.1104(b) *"Delivery vessel" means any tank truck, tank-equipped trailer, railroad tank car, or any similar vessel equipped with a storage tank used for the transport of a volatile organic compound from sources of supply to any stationary vessel.*

Paragraph (2) of this rule does not apply due to reference to areas outside counties listed in table 61-a.

**Paragraph (3): After December 31, 1982, it is unlawful for a person to load, or allow the loading of, gasoline from a delivery vessel into any existing stationary vessel of more than 2,000-gallon capacity**

**located at either of the following loading facilities, unless the stationary vessel is controlled by a vapor balance system or an equivalent control system approved by the department: (a) A loading facility located in any area listed in table 61.**

Buckeye Terminal is located in Genesee County, T8N, R7E, Section 20. This is a section listed under Table 61, yet since gasoline is not loaded into a vessel from a "delivery vessel", this rule does not apply. Should Buckeye receive gasoline via a delivery vessel, they must comply with Rule 607.

**Rule 627 states: A person shall not operate any delivery vessel that is subject to control by a vapor collection system, either vapor balance or recovery system, required by R 336.1606, R 336.1607, R 336.1608, R 336.1609, R 336.1703, R 336.1704, R 336.1705, or R 336.1706, unless all of the provisions of this rule are met.**

**INSPECTION RESULT: COMPLIANCE. Buckeye does not own delivery vessels.**

PTI 138-05B SC FGIFRTANKS IV.1. requires the tanks to have a welded deck with a liquid primary seal and a secondary seal.

**INSPECTION RESULT: COMPLIANCE. EU00001 EU00002, and EU00010 are tanks with a geodesic dome with an internal floating roof. Tanks EU00004 and EU00007 and now the modified EU00009 have cone roofs with an internal floating roof. These tanks meet the design parameters listed in this condition.**

PTI 138-05D SC IFR TANKS VI.1 requires the permittee to retain records of throughput of each specific petroleum product for each calendar month and 12 month rolling time period.

**INSPECTION RESULT: COMPLIANCE. Records of throughput of each petroleum product type for the terminal were provide by J. Golightly on 9/27/2022, per my 9/20 request; please see Flint\_location\_emissions\_deta.pdf, attached.**

(End of compliance check with PTI 138-05D for FGIFRTANKS)

#### **FLIR camera use on FGIFRTANKS:**

EUTANK1, EUTANK2, EUTANK4, EUTANK10, EUTANK11, and EUTANK15 were examined during the inspection. There were no visible emissions from any of the tanks, as seen with the unaided eye.

EPA's D.Sutlin and also B. Cobb used the FLIR camera on the tanks and pumps and other processes onsite. A number of the IFR tanks, as seen through the FLIR camera high intensity setting, had vapor emissions coming out of the south or east vents at the top of the tank sides or from around the perimeter of the roof. The winds out of the west seemed to be pushing vapors from the west side of the tanks (above the IFR and the tank roof/ceiling) to the south or east sides. The data was qualitative, rther than quantitative.

#### **Tanks with emissions seen by the FLIR camera:**

- EUTANK1: Emissions seems with FLIR out of south side vents, and a little out the north side.
- EUTANK4. From ground level, the FLIR saw emissions rom the roof and a little from the top of wall vents, on the west side, and on the southwest side. I was able to see, in high intensity and in low intensity modes, emissions from a south facing vent.
- An additional tank appeared to have emissions as seen by the FLIR, but I did not find the tank number in my notes.

David explained to Buckeye staff that they were not here to make a compliance determination, but they were concerned about the vapor leaks. My impression was that Buckeye staff had not thought there would be any vapors between the IFRs and the ceilings/roofs of the IFR tanks, but clearly vapors were getting puched out by the wind. We went atop an IFR tank, to the stair platform at the top, and

the FLIR did not detect any vapors up there, even when a small hatch was opened, though it had been expected that there could be vapors.

**Check for odors from FGIFRTANKS:**

There was an ethanol odor from Tank 10, which was barely detectable. Tank 10 had dusty-looking black streaks on it, which are associated with fungus, and are common on ethanol tanks.

It is my understanding that the seals of the NSPS Kb-subject EUTANK9 and EUTANK15 are inspected every 5 years, per the NSPS, 40 CFR Part 60, Subpart Kb. These are the only Kb-subject tanks onsite.

It is my understanding that they also do the following kinds of inspections:

1. Twice per day, they do a walk around examination of the tanks at the tank farm, and this is documented in hard copy form.
2. Every month they do a monthly in-service tank inspection of every tank, and document this. I have been advised by K. Trostel (in 2019) that this is not required by air regulations, but is an internal requirement of Buckeye terminal.
3. They do an annual in-service inspection on every tank, including an IFR inspection from the hatches of the tank.
4. They do external routine inspections every 5 years, pursuant to API (American Petroleum Institute) requirements.
5. Every 10 years, the IFR tanks are taken out of service for 1-2 months, for a close up internal inspection, done by a contractor.
6. A "653" inspection is done on all tanks, every 5 to 20 years, depending on Buckeye's opinion. This inspection is said to be required every 20 years at a minimum, and more often, if need be, and is said to focus heavily on corrosion and tank integrity.

**FGFACILITY; PTI No. 138-05**

I was given a copy of a blank daily site inspection form for the facility, in addition to a copy of the 4/11/2022 daily inspection form, please see attached, . There were multiple items to check, under the following categories:

- Gas & fuel oil loading
- Container storage
- Tank farm
- Lab
- VCU/VRU
- Sumps
- Ethanol offloading station and railcar
- Security inspection checklist

FGFACILITY lists the opt-out requirements for the site for VOC's and HAPs, to keep the facility from becoming a major source.

Compliance check with PTI 138-05D for FGFACILITY:

PTI 138-05D SC FGFACILITY I.1. sets a VOC limit of 86.3 TPY.

**INSPECTION RESULT: COMPLIANCE.** From records emailed to me on 9/27/2022 by J. Golightly (please see Flint\_permit\_compliance.pdf, attached) VOC 12-month rolling emissions as of April 2022, the month of the inspection, were 20.20 tons, or 23.4% of the VOC limit.



**PTI 138-05D SC FGFACILITY I.2.sets an Individual HAP limit of less than 9 TPY.**

***INSPECTION RESULT: COMPLIANCE. From records emailed to me on 9/27/2022 by J. Golightly (please see Flint\_permit\_compliance.pdf, attached) individual HAP 12-month rolling emissions as of April 2022, the month of the inspection, were 0.15 tons, or 1.71% of the individual HAP limit.***

**PTI 138-05D SC FGFACILITY I.3 sets a total HAP limit of less than 22.5 tons limit.**

***INSPECTION RESULT: COMPLIANCE. From records emailed to me on 9/27/2022 by J. Golightly (please see Flint\_permit\_compliance.pdf, attached) total HAP 12-month rolling emissions as of April 2022, the month of the inspection, were \_0.45 tons, or 2.02% of the individual HAP limit.***

**PTI 138-05D, FGFACILITY SC VI.1 requires calculations in a format acceptable to the AQD District Supervisor, and available by the 15th day of the calendar month, for the previous calendar month..**

***INSPECTION RESULT: COMPLIANCE. From records emailed to me on 9/27/2022 by J. Golightly (please see Flint\_permit\_compliance.pdf, attached), the format was acceptable. Records for the month of August 2022 were available, although I was not able to tell if the report had been created prior to 9/15/2022 the eadline. However, there was no reason to suspect that the record had been created after 9/15.***

**PTI 138-05D, FGFACILITY SC VI.2 requires records on a monthly and 12-month rolling basis of VOCs, individual HAPs, and total or aggregate HAPs.**

***INSPECTION RESULT: COMPLIANCE. From records emailed to me on 9/27/2022 by J. Golightly (please see Flint\_location\_emissions\_deta.pdf, attached), it could be seen that this was done.***

**(End of compliance check with PTI 138-05D for FGFACILITY)**

**Exempt tanks; Rules 284(i) and 284(2)(g)(i):**

MAERS EU	EU description	Contents	Exemption rule
EUTANK6	Horizontal, submerged fill	XOM Additive HiTEC 65016 Gasoline Additive	284(i)
EUTANK8	Horizontal, submerged fill	CLS-1334 fuel additive	Rule 284(i)
EEUTANK12	Horizontal, submerged fill	Generic gas additive MCC 0092	284(i)
EUTANK13	Horizontal, submerged fill	BP Additive Invigorate-3	284(i)
EUTANK14	Horizontal	Summer/spring: MCC Lubricity 2115 SD Plus Winter/autumn: MCC Cold Flo 6415 SD Plus	284(i)
EUTANK19	350 gal. steel tote at EULOADRACK	Red dye	284(2)(g)(i)
EUTANK20	1,000 gal. additive tank	Diesel additive	284(2)(g)(i)

**R336.1284(i) is a permit exemption for: 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.**

In 2016, AQD's N. Hude confirmed that the tanks were all below the 40,000 gallon threshold.

EUTANK6, according to my field notes, is used to store XOM Additive HiTEC 65016 Gasoline Additive. The SDS I received in 2019 for EUTANK6 was for HiTEC 6591N Fuel Additive, however. I could not locate vapor pressure within the SDS data. On 9/10/2019, AQD emailed K. Trostel, to determine the contents of Tank 6, and vapor pressure. On 9/10/2019 she advised me that Tank 6 only contains HiTEC 6591N, and sent me the SDS (please see attached). She advised that the maximum vapor pressure for this generic additive is less than 0.1. This is well below the upper threshold of the exemption. There were no visible emissions witnessed from this tank during the inspection.

EUTANK8 is currently unused, and is clean, or empty, I was advised..

EUTANK12 currently stores generic gas additive MCC 0092. The SDS, states that for vapor pressure there is "No Data Available." On 9/10/2019, AQD had emailed K. Trostel, to inquire as to vapor pressure, and she responded that the maximum vapor pressure for this generic additive is less than 0.1. This is well below the upper threshold of the exemption. There were no visible emissions witnessed from this tank during today's inspection.

EUTANK13 currently stores BP Additive Invigorate-3. The SDS identifies the vapor pressure as 2.40 hPa at 20 degrees C, and 8.0 hPa at 49 degrees C. There were no visible emissions witnessed from this tank during the inspection.

EUTANK14 : It is my understanding that in summer/spring, MCC Lubricity 2115 SD Plus is stored, while in winter/autumn, MCC Cold Flo 6415 SD Plus is stored. The maximum vapor pressure was estimated at 0.007 psi, well below the exemption's upper threshold of 1.5 psia. There were no visible emissions witnessed from the tank during the inspection.

#### **Grandfathered Equipment:**

MAERS EU EU description	Contents	Install date
EUTANK3 Cone roof, submerged fill	Distillate oil #2	1959
EUTANK5 Horizontal, submerged fill	Transmix	1959
EUTANK7 Horizontal, submerged fill	Transmix	1959
EUTANK9 NO LONGER GRANDFATHERED; IFR, Cone roof, submerged fill	Distillate oil #2	1937

Act 348, Public Acts of 1965, also known as the Michigan Air Pollution Act, became effective on August 15, 1967. Equipment installed prior to this date is considered grandfathered if the equipment has not been reconstructed, relocated, or modified per Michigan Air Pollution Control Rule 201(1)(b).

EUTANK3 was e installed in 1959. Thus, EUTANK3 is grandfathered. In addition, this tank contains distillate oil #2, also known as diesel fuel, so it meets the permit exemption of R284(d) which states:

*Storage of no. 1 to no. 6 fuel oil as specified in ASTM-D-396, gas turbine fuel oils nos. 2-GT to 4-GT as specified in ASTM-D-2880, or diesel fuel oils nos. 2-D and 4 D as specified in ASTM-D-975. The ASTM methods are adopted by reference in R336.1299.*

I saw no visible emissions from EUTANK3.

EUTANK5 was installed in 1959 and so is grandfathered. It is identified as containing transmix. In 2019, a Safety Data Sheet (SDS) for the transmix identified the vapor pressure as 2-475 mm Hg @ 20 C. I saw no visible emissions from the tank today.

EUTANK7 was installed in 1959 and is said to contain transmix, or a diesel additive. I saw no visible emissions from Tank 7 during the inspection.

EUTANK9 had once been considered grandfathered, as it was installed in 1937. However, it became permitted under PTI No. 138-05C, with the installation of an IFR, and is currently permitted under PTI 138-05D.

#### **40CFR60 Kb**

This NSPS regulation is for compliance inspections for any storage vessel > 75m<sup>3</sup> (19,813 gallons) used to store volatile organic liquids which was constructed, reconstructed, or modified after 7/23/84. Per N. Hude, this regulation only applies to EUTANK15 based on a install date of 1995.

The requirement is for a seal inspection to be conducted every time a tank is taken out of service, yet not to exceed a 10 year interval. It is my understanding that Buckeye utilizes third party contractors to conduct the inspections, either in service or out of service depending on the circumstances. No certificate is required or produced after these inspections.

#### **40CFR63 BBBB**

AQD does not have delegation authority of this regulation, thus a in depth inspection was not completed regarding the regulations requirements. However, semi-annual reports to demonstrate compliance with Subpart BBBB are submitted to AQD in addition to U.S. Environmental Protection Agency Region V. The most recent reports indicated compliance.

Subpart BBBB establishes national emission limitations and management practices for hazardous air pollutants (HAP) emitted from area source gasoline distribution bulk terminals, bulk plants, and pipeline facilities. This subpart also establishes requirements to demonstrate compliance with the emission limitations and management practices. By definition, Buckeye is a bulk gasoline terminal and not a pipeline breakout station nor a pipeline pumping station.

This regulation refers to tanks containing gasoline only; thus it applies to EU00001, EU00002, EU00004, EU00007, and EU00010. The requirement is for the installation of submerged fill pipes (63.11086) for anything >250 gallons in capacity; leak inspections (63.11089); and management practices which reduce spills. A performance test is also required per 63.11092(a)(1) and the installation of a continuous monitoring system (CMS) on the vapor recovery system per 63.11092(4)(b). Testing methods are described in 40CFR60 XX.

AQD does not have delegation of authority from U.S. EPA for Subpart BBBB, as has previously been mentioned in this report. Buckeye reports to EPA and AQD, on a semi-annual basis, on compliance status.

Post-inspection, a Subpart BBBB report was received on 8/16/2022 Co. reported: tanks 10 & 15 complying with Kb, and 1 and 4 complying with GACT-modified Kb, and no leaks not repaired within 15 days. Also reported no loading of gasoline cargo tanks without vapor testing tightness documentation. For flare & alternative CMS, co. reported no CMS downtime, no excess emissions, no parameter exceedances, or excursions reported. For CEMs, there were no excess emissions reported, but CMS downtime of 9.9 hours out of 4,344 hours was reported. However, at 0.23%, this was much less than 5% of total source operating time. No malfunctions reported.

#### **Post-inspection meeting:**

A number of the IFR tanks, as seen through the FLIR camera high intensity setting, had vapor emissions coming out of the south or east vents at the top of the tank sides or from around the perimeter of the roof. The winds out of the west seemed to be pushing vapors from the west side of the tanks (above the IFR and the tank roof/ceiling) to the south or east sides.

David explained to Buckeye staff that they were not here to make a compliance determination, but they were concerned about the vapor leaks.

AQD did not identify any instances of noncompliance at the site.

**Conclusion:**

No instances of noncompliance could be determined during the inspection by AQD. During the subsequent review of records received by AQD from the company, the only instance of noncompliance was that 12-month rolling VOC emissions from Tank 11 in April 2022 were 3.74 lbs, over the permit limit of 2 lbs/yr specified in PTI No. 903-91. The company has informed AQD that they will submit a permit void request for PTI 903-91, as the tank is capable of operating under the MAPC Rule 284(i) exemption. This will resolve the current noncompliance.

**Note:** Based upon emissions as seen from three tanks with the FLIR camera, EPA explained they had concerns. EPA will follow up as they determine is appropriate.

NAME 

DATE 9/30/2022

SUPERVISOR RB