B9183
MANILA

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

B918335379

FACILITY: Sunoco Pipeline L.P. - Inkster Terminal		SRN / ID: B9183
LOCATION: 7155 INKSTER RD, TAYLOR		DISTRICT: Detroit
CITY: TAYLOR		COUNTY: WAYNE
CONTACT: Joseph Young, Jr. , Operations Supervisor		ACTIVITY DATE: 06/15/2016
STAFF: Terseer Hemben	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: VOC and record keeping -NSPS		
RESOLVED COMPLAINTS:		

SCHEDULED INSPECTION

INSPECTED BY : Terseer Hemben, MDEQ
PERSONNEL PRESENT : Mr. David Bonnier, Operations Supervisor ((313-595-9620 cell)
On the behalf of Lisa Fishbeck
FACILITY PHONE NUMBER : (313)-292-8850 X825
FACILITY FAX :
DATES OF INSPECTION : 6/15/2016
SRN: B9183

FACILITY BACKGROUND: SUNOCO Logistics

Sunoco Logistics facility is located at the 7155 Inkster Road address, in Taylor, Michigan. The facility is a network terminal of pipelines that transport petroleum products from refineries for distribution to customers in Midwest business region. The fuel and other petroleum products travel through the Sunoco Logistics network of pipelines and storage terminals. Sunoco Logistics transports, and stores refined petroleum products such as gasoline, liquefied petroleum gas (LPG) for customers in major activity centers in the Southeast Michigan region of the United States. The facility has 3 storage tanks. Tanks# 4, #7 and Tank# 8. Tank# 4 and Tank# 8 store brine. Tank# 7 stores gasoline and functions as a breakout station. Breakout station takes in products via pipeline and distributes out via pipeline only. Two Bullet tanks are available for storage of cryogenic products such as liquefied petroleum gases comprising chiefly of propane, traces of ethane, butane and pentane. The facility does not operate a gasoline loading rack. Butane/LPG comes in via truck and the product is unloaded into the 2 bullet tanks using the LPG loading rack. Product distributors load LPG from the automated loading rack via trucks for delivery.

INSPECTION NARRATIVE

I arrived at the Sunoco Logistics (SL) facility located at 7155 Inkster Road, Taylor on June 15, 2016 at 1010 hours. Temperature at the hour was 69 F and the wind speed 9.2 mph coming from the ESE. The humidity was 70%. The purpose for visit was to conduct a scheduled compliance inspection. SL facility operates petroleum products facility as a breakout station for distribution under federal rule 40 CFR 63, Subpart 6B, and subject to NSPS regulatory conditions guiding storage of organic liquids in Internal Floating Roof Tanks (Subpart Kb) and distribution practices. The SL facility lies within a triangular piece of land bordered to the north by Ecorse Road, in the west by Inkster Road, and in the South by the I-94 highway running east-west. There are no residential areas in the nearby vicinity. I was admitted onto the site by David Bonnier, the Supervisor. The operations supervisor met joined me for the pre-inspection conference in the office. The supervisor drove me around the facility for the compliance inspection. We inspected the tanks 4, 7, 8, and the 2 bullet tanks (92 and 93). During the pre-inspection conference, the operation supervisor informed SL did not make any major modification at the site except for conversion of a tank to non-regulated brine storage.

COMPLAINT/COMPLIANCE HISTORY:

SL has not been a source of citizen air quality complaints.

OUTSTANDING CONSENT ORDERS:

None

OUTSTANDING LOV'S:

None

OPERATING SCHEDULE/PRODUCTION RATE:

The facility is capable of operating 24 hours per day, 365 days per year.

PROCESS DESCRIPTION:
The SL facility distributes gasoline via pipeline. The facility management operates two 12-hour shifts at 12 hours per day, 7 days in a week and 365 days in a year continuously. The SL facility uses an automated process control technology for loading LPG product for distribution.

EQUIPMENT AND PROCESS CONTROLS:

The SL facility operates LPG storage and distribution at the facility. Two butane storage bullet tanks are located on site. Tank# 4 stores brine. Tank# 7, with 50,000 gallon - capacity stores gasoline. Tank# 8 was converted to a brine storage facility. The bullet tanks hold LPG for product unloading and loading at site. Containment wall is built around the tank farm to provide safety against emergency spills. The body of tanks, pipelines and fixtures (pumps, valves, flow meters and flanges) appeared sturdy.

COMPLIANCE STATUS

SL operates petroleum products breakout station that (a) receives gasoline from refineries via pipeline into the facility storage tank (Tank#7) and distributes to customers via pipeline only, (b) trucks in LPG/Butane into bullet tanks, and (c) loads LPG/Butane from the bullet tanks using the loading rack for distribution to customers. The SL facility does not process petroleum products. The facility operates under the federal exempt rule for reporting in accordance with conditions 40 CFR 63, Subpart BBBBBB as in 63.11095. The facility submitted notification of compliance status (NOCS) report under GACT (modified MACT) [NOCS reports are located in MACES file]. However, AQD does not have delegation to regulate the MACT Subpart BBBBBB.

The R 336.1606, R 336.1607. R 336.1608, R 336.1703, R 336.1704, R 336.1705 parts of the MDEQ Air Pollution control rules parts 6 and 7 Emission Limitations prohibitions for New Source/Existing Sources of VOC Emissions did not apply to the facility. The SL does not load gasoline at the facility. The Inkster facility is a breakout station. All gasoline loads enter and exit the facility via pipeline. The facility operated in compliance.

Rule 201(1) - SL stated the facility operated in compliance. There was no violation of rule 201 as established because the facility did not modify or change the process or equipment at the site.

Rule 336.1604 requires storage tanks containing organic liquids with vapor pressure greater than 1.5 psia but less than 11 psia to employ VOC vapor control measures such as installation of vapor recovery unit or/and floating roof structures with mechanical seals. The SPMT adheres to the requirements of the rule through mechanical installation of internal floating roof with seals with all opening covered with lids consistent with R 336.1604(1) and R 336.1604(2) in tank # 7. The facility is subject to NESHAP requirements for maintenance and reporting all monitored outcomes relating to VOC emissions. The SL elected to use the Gasoline Distribution MACT version (GACT): Emission Screening Equation 40 CFR 63.420 (a) (1) to demonstrate non-applicability. The facility is in compliance.

Tank# 7 - SL stated the tank remains in gasoline service as applicable to Subpart BBBBBB and NOCS. The 50,000 gallon capacity tank has a steel pan internal floating roof and equipped with a shoe primary seal. The tank has geodesic dome fixed roof. The design meets federal tank regulatory requirements for gasoline storage. The fixed roof hatch remains in closed positions at all times, except when in use [Attachment A, Pg. 1, Item# 1]. SL performs routine inspections and maintenance on the seals and lids servicing Tank #7, and reports same to EPA's attention consistent with NSPS Subpart Kb monitoring requirements.

Modification of process/equipment in the last 2 years occurred in taking Tank# 8. The tank# 8 was taken from out of service status and converted into usage for brine storage in support of the facility butane operations. Tank# 8 was no longer subject to 40 CFR Part 63, Subpart 6B MACT rules. The Tank previously held gasoline until 2011. Notification of change dated October 13, 2015 was sent to EPA [Attachment# A]. The Tank is no longer included in the Semi-Annual 6B and NOCS reports , and meets the exempt status in category of Rule 284(h). SL operated in compliance.

Tank# 4 - The Tank# 4 is used for storage of brine and meets exempt status consistent with rule 284(h). Tank# 4 is not subject to 6B. The 2 butane bullet vessels onsite (Tanks# 92 and 93) are pressurized tanks and not subject to AQD delegation for permitting. The tanks meet the exempt status under rule 284(j).

Rule 604-The facility met the requirements of Rule 604(1)(a). The SL stores butane in pressurized bullet vessels capable of maintain and preventing organic and vapor loss to the ambient air.

The vessel also met Rule 604 (1) (b) requirements for storing organic liquids with vapor pressure higher than 1.5 psia but less than 1 psia equipped and maintained with a floating cover or roof which rests upon, and is supported by the liquid being contained and has closure seal or seals to reduce the space between the cover or roof edge and the vessel wall. Tank# 7 was equipped with seals and internal floating roof that meet the storage requirements for gasoline.

Tank Facility Requirements: Remediation - SL stated there is no oil-water separator on site. There are no underground storage tanks onsite. SL is in compliance with remediation requirements.

SL facilities does not process or load gasoline, therefore the facility has no flare system on the site.

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:

This facility does not have nor is in need of a fugitive dust plan.

MAERS REPORT REVIEW:

Sunoco's 2015 MAERS submittal was reviewed and found to be in compliance with emissions MAERS requirements.

FINAL COMPLIANCE DETERMINATION:

Based on the records submitted by SL and visual inspection of the facility during the recent visit to the site, the Sunoco Partners Marketing & Terminals, LLC-Inkster facility is in compliance with the air pollution rules. The facility operations satisfied and maintained the GACT and NSPS subpart Kb requirements. The SL operated in compliance with Air pollution control rules and regulations as required by the federal and state exempt rule.

NAME _____ DATE 9/13/2016 SUPERVISOR JK