B9201
Mar 1/4

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

B920141541

FACILITY: MPLX Terminals LLC - Romulus Terminal		**SRN / ID:** B9201
LOCATION: 28001 CITRIN DR, ROMULUS		**DISTRICT:** Detroit
CITY: ROMULUS		**COUNTY:** WAYNE
CONTACT:		**ACTIVITY DATE:** 08/04/2017
STAFF: Jorge Acevedo	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

COMPANY NAME : MPLX Terminals LLC - Romulus Terminal
FACILITY ADDRESS :28001 Citrin, Romulus MI 48121
STATE REGISTRAT. NUMBER :B2798
SIC CODE :5171
EPA SOURCE CLASS : A
EPA POLLUTANT CLASS : N,C
LEVEL OF INSPECTION : :PCE
DATE OF INSPECTION :08/4/17
TIME OF INSPECTION : 10:30 AM
DATE OF REPORT : 08/4/17
REASON FOR INSPECTION : Scheduled Inspection.
INSPECTED BY : Jorge Acevedo
PERSONNEL PRESENT : Jackie Gast, Sam Awad
FACILITY PHONE NUMBER :
FACILITY FAX NUMBER :

FACILITY BACKGROUND

MPLX Terminal in Romulus, Michigan operates a petroleum products bulk storage terminal. The equipment is permitted under Wayne County Air Permits to Install 11580 through 11590 for a gasoline distribution facility, seven internal floating roof storage tanks, three fixed roof storage tanks, two vapor recovery units, and a loading rack.

INSPECTION NARRATIVE

I arrived at the facility at 10:30AM. I met with Jackie Gast, Environmental Professional, and Sam Awad, Terminal Manager. I explained the purpose of the visit. Ms. Gast explained the facility operations and explained that there had recently been a name change. MPLX is a limited partnership formed by Marathon Petroleum Corporation to own, operate, develop and acquire midstream energy infrastructiure assets. Ms. Gast explained that there are three active bays and one bay is unoccupied. There are also two vapor recovery units. One is active while one is offline and used during maintenance periods. The carbon in the vapor recovery unit is typically replaced every ten years.

After the summary of the facility's operation, Ms. Gast and Mr. Awad accompanied me out into the facility. Our first stop was the loading bays. There were no strong odors while there was loading occurring. Ms. Gast explained that MPLX requires each trailer that enters the facility to have a valid vapor tightness test on file with MPLX. Drivers are instructed to report any spills, accidents, or emergencies immediately to terminal staff. Ms. Gast explained that the facility currently loads gasoline and diesel and does not currently load jet fuel. Fuel is brought in through two pipelines. In Bay 2, diesel is loaded into tank trucks. In Bay 3, both diesel and gasoline are loaded. In Bay 4, gasoline is loaded. After observing the loading bays, we went into the tank farm. Tank 35-1 currently had its roof landed and maintenance was occurring during the inspection. Next, we observed the two vapor recovery units. There is an approximate 15 minute cycle for the vapor recovery units.

I left the facility around 11:45AM. Ms. Gast emailed me records on August 7, 2017.

COMPLAINT/COMPLIANCE HISTORY

No complainants have been received regarding this facility. No Violation Notices (VN) have been issued

regarding this facility.

PROCESS EQUIPMENT AND CONTROLS

The trucks pull up to the gate and must scan an identification card to enter the gated filling area. The trucks then pull up to the lane, stopping just before entering the loading area. The driver exits the truck and physically inspects all sides of the truck. Next the driver enters the loading area and begins the process of filling the tricks. A vapor capture system is attached to the truck during filling. This system captures the vapor as it is pushed out of the truck from the entering gasoline liquid.

The vapor travels through a pipeline to the vapor recovery system, where it passes through a carbon bed via vacuum forces. Theoretically, the facility recovers 1 gallon of gasoline for every 1000 gallons used to fill the trucks. The facility has 2 vapor recovery units (VRU), with each one having 2 carbon beds. For each unit one carbon bed is regenerating while the other is operating. The smaller VRU is located first in the process flow. The easiest flow path changes to the second unit as the first unit reaches capacity and the pressure increases. This system allows for more balanced usage of both units. The remainder of the site is a tank field for different grades of gasoline and diesel fuel. The facility samples the product each time a new delivery comes to fill their tanks, using equivalent equipment as the state testers. Also, personnel test all tanks weekly.

The facility had an electronic system that monitors the vapor recovery unit and the sample results, as well as other physical characteristics of the fuels. Most records are collected electronically and stored at the Findley, Ohio site. The facility operates 24 hours per day, 7 days per week, and 365 days per year. An employee is on call should a problem arise. A computer system tracks who and when filling of the trucks occur. All of the drivers must meet the requirements of MPLX before being allowed to full the truck during the unmanned hours.

APPLICABLE RULES/PERMIT CONDITIONS

The facility is operating under Wayne County Permits C-11580-11590 for a gasoline distribution facility, 7 internal floating roof storage tank, 3 fixed roof storage tanks, 2 vapor recovery Units, and a loading rack.

17. Compliance – The facility is limited to 59 tons per year of VOC emissions. Based on MAERS for 2016, the facility emitted 27.65 tons VOC.
18. Compliance – The facility is limited to 290.6 million gallons throughput. Based on MAERS for 2010, the throughout of gasoline was 129.3 million gallons, which is less than the permitted limit.
19. Stack testing was preformed on October 13, 2010 and the results were acceptable.
20. Compliance – Vapor Recovery Unit operating properly during the onsite inspection.
21. Compliance – Delivery system is installed and operating properly during the onsite inspection.
22. Compliance – Delivery vessel requirements were met during the onsite inspection.
23. Compliance – the true vapor pressure for the fuels is less than 1.5 psia
24. Compliance – The facility is emitting less than 25 tons of total HAPS.
25. Compliance – The facility submitted MAERS accurately and timely.
26. Compliance – 0% opacity was observed during the onsite inspection.
27. Compliance – Proper records were being maintained.
28. Compliance – No odor complaints have been received regarding this facility. No odors were detected off site.

MAERS REPORT REVIEW:

Pollutant	2016 Emissions(TPY)
VOC	27.65

FINAL COMPLIANCE DETERMINATION

MPLX Terminals LLC appears to be operating in compliance with all state and federal regulations as well as all permit conditions.

NAME _____ DATE 7-6-17 SUPERVISOR W. M.