

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

N050657908

<b>FACILITY:</b> TAYLOR EAST TERMINAL - BUCKEYE (WAS ATLAS OIL CO)		<b>SRN / ID:</b> N0506
<b>LOCATION:</b> 24501 ECORSE RD, TAYLOR		<b>DISTRICT:</b> Detroit
<b>CITY:</b> TAYLOR		<b>COUNTY:</b> WAYNE
<b>CONTACT:</b> Kimberly Trostel , Senior Specialist, Air Compliance		<b>ACTIVITY DATE:</b> 03/12/2021
<b>STAFF:</b> C. Nazaret Sandoval	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> FY 2021 Scheduled Inspection		
<b>RESOLVED COMPLAINTS:</b>		

**Location:**

Buckeye Terminals, LLC – Taylor East Terminal (SRN N0506)  
24501 Ecorse Road  
Taylor 48180

**Inspection Date:**

March 12, 2021

**Personnel Present:**

Nazaret Sandoval, EGLE-AQD Detroit Office  
Chad Masserant, Terminal Operator – Buckeye Taylor Terminals

**1. Purpose of Activity**

A scheduled inspection of the Buckeye Terminals, LLC – Taylor East Terminal (hereinafter “Buckeye Taylor East”, or “Buckeye Taylor”) was conducted on March 12, 2021. The Buckeye Taylor East facility was on my list of sources targeted for an inspection during FY 2021. The purpose of this inspection was to determine compliance of operations at the Buckeye Taylor facility with applicable rules, regulations and standards as promulgated by Public Act 451 of 1994 (NREPA, Part 55 Air Pollution Control), applicable Federal standards, and any applicable permits.

This inspection report will evaluate Buckeye Taylor East’s compliance with the conditions and requirements of permit PTI No.249-03A issued on January 5, 2016, which is the active permit on March 12, 2021.

**2. Facility Description**

The Buckeye Taylor East facility is a liquid fuel storage and distribution facility, also known as a bulk terminal. The facility was sold to Buckeye by Atlas Oil in January 2006. Atlas Oil, a fuel supply company, still operates offices in the building closest to Ecorse Road; they lease the office space from Buckeye. The Buckeye Taylor East facility is located along the south side of Ecorse Road, just west of Telegraph Rd. The facility is bounded to the south by the Norfolk Southern railroad track and associated right of way; to the east by an open piece of property; to the north by some commercial properties and a park (Atlas Park), with a residential neighborhood immediately behind the commercial properties and the park; and to the west by the Buckeye Terminals, LLC – Taylor West facility. The neighboring Buckeye Taylor West facility (24801 Ecorse Road, SRN B9036) is a Jet-A fuel terminal, providing fuel to Detroit Wayne County Metropolitan Airport. The nearest residences are located approximately 120 yards to the north; 225 yards to the south; and 350 yards to the west of the facility.

Operations at the Buckeye Taylor East facility primarily consist of a tank farm and a loading rack. The tank farm includes six tanks that are used to store and distribute various blends of gasoline, diesel fuel (low and high sulfur), and ethanol. There are some additional, smaller tanks that contain fuel additives, with one tank containing red dye to differentiate off-road and on-road diesel fuel.

The storage capacities listed for each tank as well as the roof configurations have been updated on this inspection report. The information was collected from historical records kept by the Air Quality Division Detroit District Office for Buckeye Taylor East, and from recent discussions with Buckeye representatives. The following are the details regarding the six fuel storage tanks in the tank farm.

- Tank 1 is the largest storage tank with a diameter of 120 ft and a height of 49.5 ft. with a calculated shell storage capacity of 4,187,833 gallons. This is a steel tank with a fixed roof on top and an internal floating roof featuring a mechanical shoe primary rim seal. Tank 1 was installed on October 24, 1973. The tank is permitted to store distillate, denatured ethanol, or gasoline. At the time of the inspection the tank was storing gasoline.
- Tank 2 has a diameter of 80 ft and a height of 49.8 ft. with a calculated shell storage capacity of 1,872,539 gallons. This is a steel tank with a fixed roof on top and an internal floating roof equipped with a mechanical shoe liquid primary rim seal. Tank 2 was installed on March 16, 1971. The tank is permitted to store distillate and denatured ethanol. At the time of the inspection the tank was storing ethanol.
- Tank 3 has a diameter of 80 ft and a height of 39.5 ft. with a calculated shell storage capacity of 1,485,247 gallons. This is a steel tank originally installed on August 18, 1954 with an external floating roof. The tank was modified on April 15, 1993 and a geodesic dome cover was installed to protect an internal floating roof. The internal floating roof has a mechanical shoe primary seal and a rim-mounted secondary seal. The tank is permitted to store distillate fuel, denatured ethanol, or gasoline. At the time of the inspection the tank was storing gasoline.
- Tank 4 has a diameter of 80 ft and a height of 48.3 ft. with a calculated shell storage capacity of 1,816,138 gallons. This is a steel tank with a geodesic dome-type roof on top, and an internal floating roof equipped with a vapor mounted primary seal. Tank 4 was installed on August 18, 1954 and modified on April 15, 1993. The tank is permitted to store distillate and denatured ethanol. At the time of the inspection the tank was storing low Ultra Low Sulfur Diesel (ULSD).
- Tank 5 has a diameter of 70 ft and a height of 48.3 ft. with a calculated shell storage capacity of 1,390,480 gallons. Tank 5 was installed on August 17, 1954 and modified on March 15, 1994. It is a steel tank with a geodesic dome roof on top, and an internal floating roof equipped with a mechanical shoe primary seal and a rim mounted secondary seal. The tank is permitted to store diesel fuel, denatured ethanol, or gasoline. At the time of the inspection the tank was empty. This tank has been out of service for more than a year following a major inspection of the internal floating roof and seals.
- Tank 6 has a diameter of 70 ft and a height of 48 ft. with a calculated shell storage capacity of 1,381,844 gallons. This is a steel tank with a geodesic dome-type roof on top, and an internal floating roof equipped with a vapor mounted primary seal and a rim-mounted secondary seal. Tank 6 was originally installed on August 17, 1954 and modified on March 15, 1994. The tank is permitted to store distillate fuel, denatured ethanol, or gasoline. At the time of the inspection the tank was storing gasoline.

Most of the fuel received at the facility (over 99%) comes from a Buckeye pipeline. The fuel products that arrive via the Buckeye pipeline come from the Husky Energy Refinery in Lima, Ohio. The fuel products are piped from Lima to Toledo, OH, to Woodhaven, MI, to Detroit, MI, and on to the Taylor terminals. The fuel product is typically piped to the site in a 10,000-barrel batch. When 10,000 barrels have been received at Buckeye Taylor East, the flow is then routed to another terminal in what is known as a “pipeline cut”.

Fuel is distributed to delivery vessels from the facility’s storage tanks via a loading rack. The loading rack at Buckeye Taylor East, which was installed in 1954, is a two-lane terminal loading rack that can dispense 500-600 gallons per minute of fuel per loading arm. The loading rack is equipped with a vapor collection system and an enclosed flare, or vapor combustion unit (VCU), as the VOC emission control device. AQD staff have been told during past site visits (and the information was confirmed during this site visit) that when a truck arrives at the facility to take on a load of fuel, the driver must key in their identifying customer information to gain access to the terminal. When the truck is driven into the loading rack, the driver hooks the scully hose (part of the fuel delivery system) from the loading rack to their tanker truck; this triggers the ignitor to light the pilot light on the flare, and the flare comes on-line. The VCU is in standby mode when fuel is not being loaded through the loading rack. If the pilot does not light, then the truck is locked out the system as fuel is not permitted to flow. This, in turn, triggers a call to the operator to check on the flare.

The VCU is a John Zink Enclosed Flame vapor combustion unit. In 2016 Buckeye applied for and received a Permit to Install modification (PTI No. 249-03A) to address the installation and operation of a new VCU. Per the PTI application, Buckeye provided that “the replacement VCU has the same control efficiency as the previous VCU unit, and therefore it did not create an increase in VOC or HAP emissions. There were no operational changes associated with the modification, however the stack dimensions in the Terminal’s existing PTI were updated.” The stack/vent information in the EURACK Emission Unit in PTI No. 249-03A was changed to reflect the stack dimensions associated with the new VCU – a 96-inch stack diameter, and a stack height of 35 feet above grade. According to information from the manufacturer that was included with the PTI application, the VCU is guaranteed to emit VOC at a maximum emission rate of 10 mg per liter of fuel product loaded (the permit limits the loading rack to a VOC emission rate of 30 mg per liter of fuel product loaded). In January 2021, Buckeye submitted a permit application to request the combination of the two adjacent Buckeye Terminals located in Taylor into one single stationary source. At the writing of this report the application No. APP-2021-0018 for Buckeye Terminals, LLC / Buckeye Pipeline Holdings, L.P. has been approved and assigned Permit to Install No. 249-03B, effective April 23, 2021.

### **3. Inspection Narrative**

I arrived at the facility at about 12:40 PM and I signed in at the Buckeye Taylor East terminal office. I met with the Buckeye Taylor East Operator, Chad Masserant, and with Michael Barrett, Lead Terminal Operator. For this inspection, Kim Trostel from Buckeye’s office in Lima, OH served as a resource providing the facility records via e-mail.

In the office, I began by asking about the operations at the facility which was assigned to me this fiscal year. I had reviewed the information from the report associated with the last visit to the facility, conducted on August 3, 2017 by inspector Steve Weis, to see if anything has changed in the time since. I told the operator that AQD was reviewing a permit application (APP-2021-0018) submitted in January 2021 where Buckeye requested the

combination of the two adjacent Buckeye Terminals located in Taylor (Buckeye Terminals, LLC / Buckeye Pipeline Holdings, L.P.) into one single stationary source. I said that during the discussion of the permit application a question came out regarding the operations at the East Terminal. It was unclear whether the East Taylor Terminal had a dedicated arm for ethanol loading and if all product loading was controlled by the VCU. Mr. Masserant invited me to inspect the loading rack and the tanks-farm. To minimize exposure due to COVID-19 restrictions, I decided to have a limited site-observation on this terminal, because I came from having inspected the adjacent facility in the morning. I restricted the inspection to the loading rack and the area west of the rack where the storage tanks No. 2 and No.4 are located. During the inspection I confirmed that the loading rack has all loading arms labeled, the red hoses were for ethanol. Denatured ethanol is directly pumped from the ethanol tank to the loading rack. The loading bays also have dedicated and separate arms for the loading of blended gasoline and distillate. All product loading is controlled by the VCU. According to Mr. Masserant the operations at the terminal have not changed and the descriptions of the process, operations and equipment are still accurate, and they should match the 2017 inspection report.

I told the operator I will ask Kimberly Trostel for the facility records to evaluate Buckeye Taylor East facility's compliance with PTI No. 249-03A special conditions (SCs). I will also schedule another visit to the Terminal in April, on the date of the VCU stack test to complete the walked-around the rest of the facility.

Before leaving the facility, I indicated that I would prepare an inspection report with the results of the compliance evaluation after having collected/evaluated all records. Additional questions or concern might come out during the preparation of the report and AQD may need to contact Buckeye for answers and/or clarifications.

I left the facility around 1:45 PM.

### **Visit follow-up and Records Collected**

I scheduled a second visit to the terminal for April 14, 2021- date of the VCU performance testing. Unfortunately, due to unexpected circumstances, I had to cancel the visit. However, since there have not been changes in the terminal since 2017, the site observations conducted on 3/12/2021 are considered reasonable and acceptable.

On 4/12/2021 I sent an email to Kimberly Trostel requesting the facility records. All records were received on 4/27/2021, except for the Malfunction Abatement Plan (MAP) updates, which I received on 4/30/2021.

The following list summarizes the records received from Buckeye, which are attached to this report for reference:

1. A copy of PTI No. 249-03A
2. A copy the "Buckeye Air Emissions Inventory". This includes the 12-month rolling fuel usage reports for gasoline and diesel, both for the reporting period from March 1, 2020 to February 28, 2021, and a facility wide emission summary for the same reporting period
3. A copy of the VOC Emission Test Results for VCU Performance Test of 4/14/2021
4. A copy of some Rule 627 gasoline tank truck pressure/vacuum certifications
5. A copy of the annual In-Service, "through-the hatch", inspection form for Tank 1 conducted on 1/12/2021
6. A copy of the most recent entry from the facility's Vapor Control Unit Preventative Maintenance (PM) Vapor Combustion Unit (VCU) Quarterly Checklist

7. A copy of the most recent 40 CFR Part 63 Subpart BBBBBB semi-annual report
8. A copy of the most relevant sections of the updated MAP – Dated April 2021

Also attached is an aerial picture from Google Maps showing the terminal layout and tank farms

In this report I will examine the permit conditions for EURACK, FGIFRTANKS and FGFACILITY, and based on the review of the facility records provided by Buckeye I will evaluate the ways in which the facility tracks compliance to meet the permit requirements.

A detailed discussion regarding the facility's compliance with PTI No. 249-03A can be found in Section six (6) of this report.

#### 4. **Complaints, Compliance History, Violation Notices**

The last full compliance evaluation inspection to this facility was conducted on 8/3/2017. Since then, there are not records of complaints, outstanding consent orders or violation notices.

#### 5. **Applicable regulations**

As referenced earlier in this report, operations at the Buckeye Taylor East facility are subject to State regulations, specifically Administrative Rules 604, 607, 609, 627 and 702. Tank 1 is subject to Federal regulations. 40 CFR Part 60, Subpart 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). Buckeye currently performs the Subpart K inspections and monitoring activities for Tank 1. All of the other fuel storage tanks in the tank farm (Tanks 2, 3, 4, 5 and 6) pre-date the 40 CFR Part 60 New Source Performance Standards (NSPS). Based on historical records, Tank 2 was installed on March 16, 1971, Tanks 3 and 4 were installed on August 18, 1954, and Tanks 5 and 6 were installed on August 17, 1954.

The facility is not subject to the gasoline terminal NSPS, 40 CFR Part 60, Subpart XX (Standards of Performance for Bulk Gasoline Terminals) due to the installation date of the loading rack. The 30 mg/L VOC emission limit for the loading rack that was put forth in PTI No. 249-03 did use the Subpart XX VOC limit of 35 mg/L as a basis. This limit was carried over to the current PTI (No. 249-03A).

The facility is subject to the area source MACT, 40 CFR Part 63, Subpart BBBBBB (National Emission Standards for Hazardous Air Pollutants: Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities). As part of the compliance demonstration with the provisions of this Subpart, Buckeye submits semi-annual compliance reports to the AQD-Detroit Office. Buckeye uses the tank inspection requirements cited on 63.11092 (e) (1), which in turn refers to 60.113b (a) (a section of NSPS Kb). This Kb regulation calls for in-service tank routine inspections at least once every 12 months. The semi-annual reports have indicated that the Buckeye Taylor East facility is in compliance with Subpart BBBBBB, but EPA is the delegated authority to determine the facility's compliance with this Subpart.

#### 6. **Compliance Evaluation**

On the date of the inspection, March 12, 2021, the Buckeye Taylor East facility was subject to the provisions of Permit to Install No. 249-03A, which was issued on January 5, 2016. The following is a summary of the compliance status of the operations at the Buckeye Taylor East facility with the terms and conditions of PTI No. 249-03A:

### **For EU-RACK**

Special Conditions 1.1 through 1.5 (Emission Limits): Buckeye demonstrated **compliance** with the emission limits in these conditions via the information presented in the Buckeye Air Emissions Inventory document that was provided to by Kim Trostel. A similar document that covers a calendar year reporting period is typically included with the facility's annual MAERS submittal. On page 6 of the document is a table titled "Breakdown of Loading Operations". This table provides the total gallons of each fuel loaded via the loading rack during the reporting period, and the resulting emissions before and after air emission controls.

Special Condition (SC) I.1 limits the pounds per hour emissions from ethanol loading without VCU operating (controlled loading). SC I.2 limits the tons per year emissions from the combined controlled + uncontrolled ethanol loading. Under the current operations ethanol loading is always controlled by the VCU. Therefore, SC I.1 is not applicable and SC I.2 condenses down to a single value, the emissions with the VCU operating, rather than the sum of two values.

For the worst-case scenario, if the controls were not used, the VOC emission from ethanol loading before controls show a value of 0.4253 tons/year, which is well below the 16.3 tpy limit cited on SC I.2. Similarly, diesel loading is always controlled by the VCU. For the worst-case scenario, the reported uncontrolled VOC emissions associated with loading diesel were 0.0438 tpy. Gasoline loading after controls reported VOC emissions of 0.0892 tons per year.

In conclusion, all emissions are well below the EU-RACK permitted limits.

Compliance with the emission limit in Special Condition (SC) I.5 is demonstrated via a performance test of the VCU, which is required in SC I.5 to be performed every five years, and in accordance with the testing requirements found in 40 CFR Part 60, Subparts XX and BBBB. A performance test was conducted on May 19, 2016 on the newly installed VCU. The test was performed in accordance with applicable requirements. The testing met and exceeded the minimum fuel loading requirement of 300,000 liters of gasoline during a 6-hour test period in Subpart XX; 129,125 gallons, or 466,738 liters of fuel was loading during the test. This test measured VOC emissions from the loading rack VCU of 1.4 mg/liters (mg/L) of fuel loaded, which is **in compliance** with the 30 mg/L limit.

Special Conditions II.1 through II.4 (Material Limits): The records kept by Buckeye, summarized and presented in the Buckeye Air Emissions Inventory documents that were provided to me, demonstrate that the facility is **in compliance** with these material throughput conditions. For the 12-month period from March 1, 2020 through February 28, 2021, Buckeye reported 15,286,628 gallons of gasoline throughput (vs. 250 MM gallon limit), 10,406,554 gallons of diesel throughput (vs. 73.5 MM gallon limit), and 1,473,001 gallons of ethanol (vs. 42.6 MM gallon limit). SC II.1 also limits ethanol to 62,000 gallons per hour. In the previous visit (on 2017) Buckeye described the maximum amount of fuel that can be dispensed via the loading rack in an hour. It equated to around 40,000 gallons per hour from the entire rack, so the facility cannot conceivably reach the 62,000 gallons per hour limit put forth in SC II.1.

Special Condition III.1 (Process/Operational Restrictions): The facility is **in compliance** with Michigan Administrative Rules 609 and 627. The "delivery vessels", or tanker trucks

belonging to Buckeye's customers, referenced in Rule 609 have the appropriate vapor control systems in place. All of the delivery vessels doing business with Buckeye at their terminal are required to perform annual tests of the vapor control systems on their vehicles, using EPA Method 27, and keep documentation of the results of these tests. I was provided with sample copies of the paperwork associated with a tanker truck pressure/vacuum test results associated with Rule 627, which are attached to this report. According to the previous inspection report Buckeye receives a fax from each delivery vessel that picks up fuel at the Taylor East facility; this fax contains the Method 27 vapor certification for that delivery vessel. The information for each vessel is entered and maintained in a company-wide database called the Terminal Automation System. If a vessel does not have a certification on file with Buckeye, or if more than a year has passed since the vessel's last certification, then the vessel is denied entry into the Buckeye Taylor East facility at the facility gate. This information was confirmed as still being valid during this site visit.

Special Condition III.2: The facility is **in compliance** with this condition. Buckeye staff provided me with the facility's Malfunction Abatement Plan documents to review. The information includes an operating manual and corrective actions for the loading rack and its associated components, as well as the VCU. The document includes the information listed in paragraphs a through c of this permit condition. I was also provided with the most recent entry from the facility's Vapor Control Unit Preventative Maintenance (PM) Vapor Combustion Unit (VCU) Quarterly Checklist. A maintenance inspection of the VCU was performed on 3/31/2021. A copy of this information is attached to this report.

Special Condition IV.1 (Design/Equipment Parameters): The facility is **in compliance** with this condition, which requires that the facility maintain a vapor tight collection system associated with loading rack activities. The facility has been keeping track of the operation of their vapor collection system in accordance with the equipment leak inspection requirements of 40 CFR 63.11095(a)(3). A copy of the most recent 40 CFR Part 63 Subpart BBBB – Semi-Annual Report, dated January 26, 2021, is attached for reference.

Special Condition IV.2: The facility is **in compliance** with the condition regarding the vapor balance systems of delivery vessels. I was told that facility staff and the tanker truck drivers that use the loading rack follow proper procedures to ensure that connections between the tanker trucks and the loading rack, as well as hatches on the trucks, are vapor-tight during fuel transfer/loading operations. The instructions for product loading are posted and visible for the truck drivers.

Special Condition V.1 (Testing/Sampling): The facility is **in compliance** with this condition, which requires that the VOC emission rate from the EURACK enclosed flare, be tested within 180 days of the permit's issuance date and once every five years thereafter. As stated earlier in this report, on May 19, 2016 the newly VCU installed in 2016, was tested. This first test occurred within 180 days of January 5, 2016 (the permit issuance date). To comply with the required five-year testing frequency, a more recent test was conducted on April 14, 2021 at the Buckeye East Terminal. No less than 30 days prior to that testing, a complete stack test plan was submitted to AQD with a cover letter dated March 3, 2021. Prior to testing, the test plan was reviewed by AQD staff and the Technical Program Unit staff approved it on 3/26/2021. The facility has 60 days following the date of the test, for the submittal of a complete report of the test results to the AQD. Since the date of this inspection (March 12, 2021) preceded the date of the stack test and the test results were not available at that time; AQD will analyze the results of this recent testing in the next compliance evaluation cycle.

Special Condition VI.1 (Monitoring/Recordkeeping): The facility is **in compliance** with these two conditions. Records of all fuel throughputs associated with the facility's loading rack are maintained on a monthly and 12 month rolling basis.

Special Conditions VI.2 and VI.3: The facility is **in compliance** with this condition. The facility has been operating the VCU at all times that fuel is being dispensed, regardless of the type, so there is currently no need to keep the records associated with this condition specific to time periods when the VCU is not operating. Also, as mentioned as part of the discussion for SC II.1, the loading rack is not capable of dispensing 62,000 gallons in an hour.

Special Condition VI.4: The facility is **in compliance** with this condition. For VI.4.a, as mentioned for the last condition, the VCU is operated for all fuel dispensing. For VI.4.b, c and d, the facility tracks and reports this information in the "Buckeye Air Emissions Inventory" documents.

Special Condition VI.5: The facility is **in compliance** with this condition. For VI.5.a, this information corresponds to the Method 27 certifications for delivery vessels that was referenced earlier in this report. For VI.5.b, records of parts replacements, repairs and maintenance for the VCU are kept in accordance with the facility's MAP. For VI.5.c, the malfunctions or failures are tracked in the company's internal system as a work-order log.

Special Condition VIII.1 (Stack/Vent Restrictions): The stack parameters were updated as part of PTI 249-03A to reflect the parameters associated with the new VCU. It is assumed that the facility is complying with this requirement.

### **For FG-IFRTANKS**

Special Condition I.1 (Emission Limits): The facility is **in compliance** with this condition. The facility keeps of throughputs and VOC emission estimates for each of the internal floating roof tanks (Tanks 1-6). For the time period from March 1, 2020 to February 28, 2021 the report shows the VOC emissions from these tanks. Tank 5 was empty. The total adds up to 4.4219tons and it includes the emissions from roof landing operations reported for tanks 1 and 3. (vs. the permit limit of 8.3 tons per year).

Special Condition III.1 (Process/Operational Restrictions): The facility is **in compliance** with this condition. Tanks 2 and 4 are not used to store gasoline. Tank 2 was holding ethanol and tank 4 stored ULSD.

Special Condition III.2: The facility is **in compliance** with this condition. Tanks 1-6 meet the requirements of Michigan Administrative Rule 604.

Special Condition III.3: The facility is **in compliance** with this condition. Tanks 1, 3, 5 and 6 meet the requirements of Michigan Administrative Rule 607 when gasoline being loaded.

Special Condition III.4: The facility is **in compliance** with this condition. Tank 1 is in compliance with 40 CFR Part 60, Subpart K.

Special Condition IV.1 (Design/Equipment Parameters): The facility is **in compliance** with this condition. The tank and associated seal descriptions, provided for each of the storage tanks listed on the table, have been updated during this inspection to match the actual configurations of the tank roofs and seals.

Special Conditions VI.1 and VI.4 (Monitoring/Recordkeeping): The facility is **in compliance** with these conditions. NSPS Subpart K inspections are performed on Tank 1. For this visit, I was provided with a copy of the annual in-service IFR Seal inspection form associated with Tank 1 that was conducted on 1/12/2021. No issues were found during the inspection. The copy of this form is attached to this report for reference.

Special Conditions VI.2 and VI.3: The facility is **in compliance** with the recordkeeping requirements in these conditions. Records are kept of the fuel throughputs and emissions associated with each storage tank. This information can be found in the attached Buckeye Air Emissions Inventory sheets.

## **FGFACILITY**

Special Conditions I.1 through I.3 (Emission Limits): The facility is **in compliance** with these conditions. Records are kept of facility-wide emission estimates for total VOCs, individual HAPs and total HAPs. According to the information provided in the Buckeye Air Emissions Inventory sheets, the facility-wide VOC emissions for the 12-month rolling time period from March 1, 2020 to February 28, 2021 was 5.3144 tons, and the total HAP emissions for that same time period was 0.1052 tons.

Special Conditions II.1 through III.3 (Material Limits): The facility is **in compliance** with these conditions. Records are kept of the throughputs of all fuels distributed at the Buckeye Taylor East facility. The throughput information can be found in the Buckeye Air Emissions Inventory sheets.

Special Conditions VI.1 and VI.2 (Monitoring/Recordkeeping): The facility is **in compliance** with these conditions. Records of facility-wide emission calculations and fuel throughputs for each type of fuel handled at the facility are kept and maintained. This information can also be found in the Buckeye Air Emissions Inventory sheets.

Special Condition IX.1 (Other Requirements): The facility submits the reports required by 40 CFR Part 63, Subpart BBBBBB. The reports, which are submitted semi-annually, state the facility's compliance with the requirements of the Subpart. EGLE-AQD does not have delegated authority for Subpart BBBBBB. As such, while we receive and review the information that the facility submits relating to Subpart BBBBBB, the ultimate authority in terms of determining the Buckeye Taylor East facility's compliance with Subpart BBBBBB rests with EPA.

## **8. MAERS Report**

MAERS for emission year 2020 was timely submitted by Buckeye on 3/10/2021. The report was evaluated by AQD during the month of April. Buckeye estimated a total of 14,857 pounds (7.4 tons) of criteria pollutants emitted. From that total, 83 % corresponds to VOC emissions (12,379 pounds or about 6.2 tons) and very minor emissions (2,478 pounds or 1.2 tons) of CO +NOx +PM + SO2. They also reported emitting 21,51 pounds of CH4. The submittal appeared to be accurate with no apparent errors and the reported emissions correlate with the change in throughputs. AQD staff accepted and passed the report on May 5, 2021 without modifications to the original report. For details of the MAERS audit refer to the compliance activity report in AQD records files.

## 9. Compliance Determination

Based upon the results of the March 12, 2021 site visit and subsequent records review, the Buckeye Taylor East facility appears to be in compliance with all applicable rules, federal regulations and the condition cited on permit PTI 249-03A.

As indicated in this report, in January 2021 Buckeye submitted a permit application to request the combination of the two adjacent terminals located in Taylor into one single stationary source. At the writing of this report the application No. APP-2021-0018 for Buckeye Terminals, LLC / Buckeye Pipeline Holdings, L.P. has been approved and assigned Permit to Install No. 249-03B, effective April 23, 2021. AQD will evaluate the facility's compliance with the cited permit in a future visit.

NAME Nazaret Sandoval

DATE 5/11/2021

SUPERVISOR JK