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MDEQ - JACKSON

August 9, 2021

AUG 12 2021

AIR QUALITY DIVISION

Mr. Mike Kovalchick
Senior Environmental Engineer
EGLE – Air Quality Division
301 East Louis B. Glick Highway
Jackson, MI 49201

Subject: Response to July 20, 2021 Violation Notice
Martinrea Industries, Inc. – Bishop Circle Assembly
State Registration Number B3658

Dear Mr. Kovalchick;

On behalf of our client, Martinrea Industries, Inc. (Martinrea), Impact Compliance and Testing, Inc. (ICT) is submitting this response to the Violation Notice dated July 20, 2021 for the Martinrea Bishop Circle Assembly (BCA) facility located in Manchester, Washtenaw County, Michigan. The Michigan Department of Environment, Great Lakes and Energy (EGLE) requested a response by August 10, 2021. This document was prepared under the direction and approval of Mr. Michael Zobel, BCA EHS Manager.

Earlier this year, BCA submitted to EGLE a Permit to Install (PTI) application for the installation of a new steam autoclave process. Based on its review of the application and other information provided by ICT and BCA, EGLE issued a Violation Notice (VN) relative to Rule 201 (No Permit to Install) and the conditions of PTI 61-14. The VN description states, "PTI 61-14 emission unit EURUBBEREX has been modified to significantly increase rubber production and a new curing system has been added".

A response to the VN and the information requested by EGLE is presented in the following sections of this letter. However, it should be clarified that the BCA facility does not produce rubber as indicated in the VN. The facility only processes, shapes, and cures rubber received from other suppliers into its final product.

1. Dates Violation Occurred

Based on records maintained by BCA, the facility's throughput first exceeded the existing permitted limit of 900,000 lb/yr for EURUBBEREX (12-month rolling period) at the end of January 2016.

Installation of the new curing system referenced in the VN began in July 2020 and was completed in January 2021. The VN indicates that installation was completed October 25, 2020, however, this was the initial target date, not the actual completion date.

2. Explanation of the Causes and Duration of the Violation

The cited violations are largely the result of high turnover for the EHS Manager position at the BCA facility. In 2017, a PTI application was prepared to increase the permitted rubber throughput rate to 3 million lb/yr (an increase from the existing 900,000 lb/yr limit). However, shortly after completing the application document, the BCA EHS Manager left the company and it was later discovered, the application was never submitted. Since that time, multiple managers have occupied the EHS Manager position, primarily focusing on employee health and safety. This resulted in a general lack of expertise related to air permitting-related issues and the installation of a new process without obtaining a modified PTI.

3. Whether the Violation is On-going

The cited violations are currently on-going and can be corrected through the issuance of a modified PTI. The corrective action (submittal of the application) has already been implemented as presented below.

4. Summary of Corrective Actions

The primary corrective action to both the cited violations is the submittal of a PTI application, which occurred on June 10, 2021, prior to issuance of the VN.

5. Dates By Which Corrective Action Will Take Place

The primary corrective action to both the cited violations is the submittal of a PTI application, which occurred on June 10, 2021, prior to issuance of the VN.

6. Steps to Prevent Reoccurrence

As previously noted, the turnover rate of the EHS Manager position at the BCA facility was a significant contributing factor to violations cited in the VN. Martinrea has assigned a senior level employee (Michael Zobel) to this position to increase communication of air permit issues to BCA staff and improve on-going compliance. Furthermore, this position now reports directly to the corporate EHS department of Martinrea, which is expected to provide more support and continuity at a corporate level, where previously the position was mostly part of the facility management.

Impact Compliance & Testing

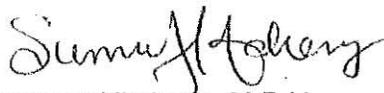
Mr. Mike Kovalchick
EGLE Air Quality Division

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Please contact us at (734) 357-8045 or Summer.Hitchens@ImpactCandT.com should you have questions or require additional information.

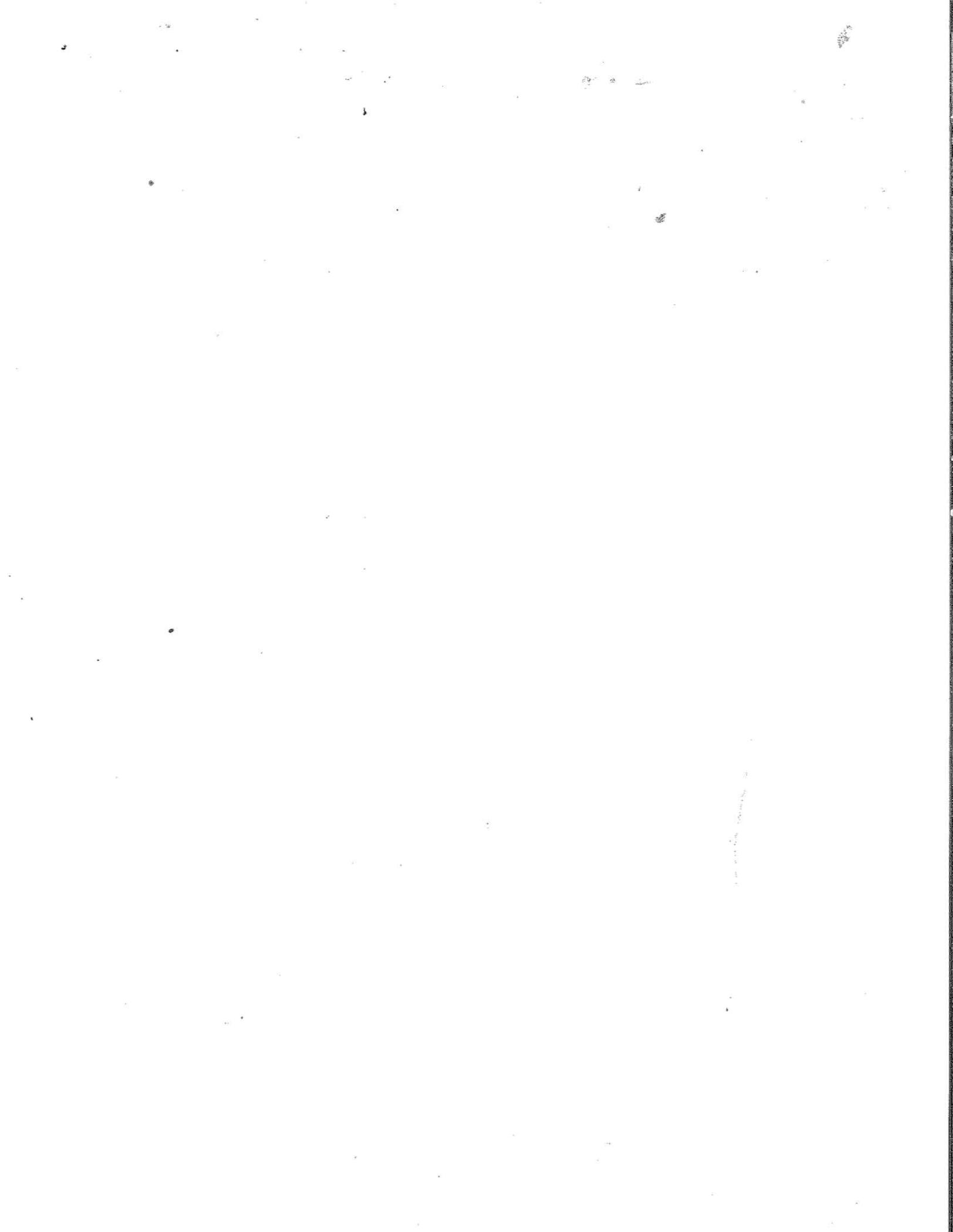
Sincerely,

IMPACT COMPLIANCE AND TESTING, INC.



Summer Hitchens, M.P.H.
Sr. Project Manager

cc: Michael Zobel – Martinrea (Electronically)
Jenine Camilleri – EGLE



Impact Compliance & Testing

Mr. Mike Kovalchick
EGLE Air Quality Division

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August 9, 2021

Please contact us at (734) 357-8045 or Summer.Hitchens@ImpactCandT.com should you have questions or require additional information.

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IMPACT COMPLIANCE AND TESTING, INC.



Summer Hitchens, M.P.H.
Sr. Project Manager

cc: Michael Zobel – Martinrea (Electronically)
Jenine Camilleri – EGLE

Sincerely,

IMPACT COMPLIANCE AND TESTING, INC.



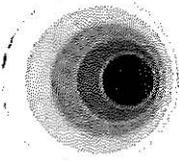
Summer Hitchcock, M.P.H.
Sr. Project Manager

cc: Michael Zobel – Martinrea (Electronically)
Jenine Camilleri – EGLE



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BUCKEYE TERMINALS, LLC

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AUG 12 2021

AIR QUALITY DIVISION

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JUL 30 2021
AIR QUALITY DIV.

July 22, 2021

EPA Region V
Director, Air and Radiation Division
77 W. Jackson Blvd.
Chicago, IL 60604-3507

MI DEQ
Air Quality Division
Constitution Hall, 3rd Floor North Tower
525 West Allegan Street
Lansing, MI 48933

**RE: 40 CFR 63 Subpart BBBBBB (also known as 'GDGACT')
Semi-Annual Compliance Report
Buckeye Terminals, LLC – Napoleon Terminal
6777 Brooklyn Road
Jackson, MI 49261**

To Whom It May Concern:

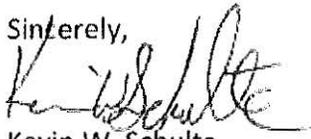
This submittal is intended to meet the reporting requirements specified in 40 CFR Part 63 Subpart BBBBBB as listed below for the January 1, 2021 –June 30, 2021, reporting period:

- 1) Combined 'Semi-Annual Compliance Report pursuant to 40 CFR 63.11095(a) and 40 CFR 63.11086(f) [for bulk gasoline plants ONLY] or 40 CFR 63.11087(d) & (e) & 11088(d) & (f) [for bulk gasoline terminals, pipeline breakout stations, and/or pipeline pumping stations];
- MACT** 2) Summary Report pursuant to 40 CFR Part 63 Subpart BBBBBB, Table 3 which references 40 CFR 63.10(e)(3).

I, being the Responsible Official, hereby affirm that, based on information and belief formed after reasonable inquiry, the statements made in these reports are true, accurate and complete to the best of my knowledge.

Should you have any questions, please contact Lee Ann Beck at LBeck@buckeye.com or 216-271-8203.

Sincerely,



Kevin W. Schulte

Assistant Operations Manager

Enc:

- Semi-Annual Compliance Report & Notification of Compliance Status.
- Summary Report-Gaseous and Opacity Excess Emission and Continuous Monitoring System Performance.

NAPOLEON TERMINAL (BETNP) SEMI-ANNUAL COMPLIANCE REPORT*

REPORTING PERIOD FROM JANUARY 1, 2021 TO JUNE 30, 2021

Semi-Annual Compliance Reporting pursuant to 40 CFR 63.11095(a) and NOCS pursuant to 40 CFR 63.11086(f) [for bulk gasoline plants ONLY] or NOCS pursuant to 40 CFR 63.11087(e) [for bulk gasoline terminals, pipeline breakout stations, and/or pipeline pumping stations]

- TANKS -

[40 CFR 63.11095(a)(1)]

Tank number	Tank Type (IFRT/EFRT/DEFRT) ** OR Surge Tank	Gasoline Service Type	Capacity (gals)	GD GACT Tank Control Options and Compliance Methodologies						
				11087(f) Tanks separately subject to NSPS Kb	Table 1, Option 1 (Tanks < -20,000 gallons)	Table 1, Option 2.b (GACT modified Kb - IFRT/DEFRT)	Table 1, Option 2.c (GACT modified Kb - EFRT)	Table 1, Option 2.d (modified MACT WW - IFRT/DEFRT)	Table 1, Option 2.d (modified MACT WW -EFRT)	Table 1, Option 3 (Surge Control Tank)
				[A] gasoline storage tank [that] is subject to, and complies with, NSPS Kb will be deemed in compliance with this section.	Equip each gasoline storage tank with a fixed roof that is mounted to the storage tank in a stationary manner, and maintain all openings in a closed position at all times when not in use.	Equip each internal floating roof gasoline storage tank according to the requirements in 60.112b(a)(1) except for the secondary seal requirements under 60.112b(a)(1)(ii)(B) and the requirements in 60.112b(a)(1)(iv) through (ix).	Equip each external floating roof gasoline storage tank according to the requirements in 60.112b(a)(2) except that the requirements of 60.112b(a)(2)(ii) shall only be required if such storage tank does not currently meet the requirements of 60.112b(a)(2)(i).	Equip and operate each internal floating roof gasoline storage tank according to the applicable requirements in 63.1063(a)(1) and (b), except for the secondary seal requirements under 63.1063(a)(1)(i)(C)&(D).	Equip and operate each external floating roof gasoline storage tank according to the applicable requirements in 63.1063(a)(1) and (b), and according to the applicable requirements of 63.1063(a)(2) if such storage tank does not currently meet the requirements of 63.1063(a)(1).	Equip each tank with a fixed roof that is mounted to the tank in a stationary manner and with a pressure/vacuum vent with a positive cracking pressure of no less than 0.50 inches of water. Maintain all openings in a closed position at all times when not in use.
Semi-Annual Compliance Reporting Methodology >>>>					N/A	Is tank compliant with 40 CFR 60.115b(a) as required by 40 CFR 63.11095(a)(1)? ***	Is tank compliant with 40 CFR 60.115b(b) as required by 40 CFR 63.11095(a)(1)? ***	Is tank compliant with 40 CFR 63.1066 as required by 40 CFR 63.11095(a)(1)? ***	Is tank compliant with 40 CFR 63.1066 as required by 40 CFR 63.11095(a)(1)? ****	
1	DEFRT	Storage	1,796,046			Yes				
2	DEFRT	Storage	897,624			Yes				
21	IFRT	Storage	424,200	Yes						
7	IFRT	Storage	1,016,400			Yes				

* Tanks listed in this table have either (1) otherwise initially determined to be in compliance or (2) has been initially determined to be in compliance at the first degassing and cleaning activity after 1/10/2011 or (3) changed their compliance option since the last Notification of Compliance Submittal

** IFRT = Internal Floating Roof Tanks, DEFRT = Domed External Floating Roof Tanks, EFRT = External Floating Roof Tanks.

*** For the Kb option, attach reports for each deviation discovered during an inspection and seal gap reports, if applicable -- unless the reports have been submitted separately for Kb Compliance.

**** For the WW option, attach reports for each deviation discovered during an inspection and for each extension taken.

- LOADING RACKS -

[40 CFR 63.11095(a)(2)]

For the semi-annual reporting period, was there any "loading of a gasoline cargo tank for which vapor tightness testing documentation had not been obtained by the facility"?

YES

NO ✓

If 'YES', then identify each occurrence below:

Date	Cargo Tank Owner	Cargo Tank ID #	Corrective Action
Total transfers: 0			

- EQUIPMENT LEAK INSPECTIONS -

[40 CFR 63.11095(a)(3)]

For the semi-annual reporting period, were any gasoline "equipment leaks not repaired within 15 days after detection"?

YES

NO

If 'YES', then provide the information identified below:

Date of Leak	"Delay of Repair" ¹ Leak Identification	Reason for Placing on Delay of Repair	Date of Repair Completion of Estimated Date of Completion
Total Leaks: 0			

¹ Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. [40 CFR 63.11089(d)]

SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE FOR FLARE AND 'ALTERNATIVE' CONTINUOUS MONITORING SYSTEMS¹

Submitted pursuant to 40 CFR Part 63 Subpart BBBB, Table 3 which references 40 CFR 63.10(e)(3).

Company: [40 CFR 63.10(e)(3)(vi)(A)]	Napoleon Terminal (BETNP)
Address: [40 CFR 63.10(e)(3)(vi)(A)]	6777 Brooklyn Road Napoleon MI, 49261
Pollutant: [40 CFR 63.10(e)(3)(vi)(B)]	VOC from gasoline and their speciated components
Reporting Period dates: [40 CFR 63.10(e)(3)(vi)(C)]	January 01, 2021 to June 30, 2021
Description of Process Units: [40 CFR 63.10(e)(3)(vi)(D)]	Gasoline loading racks with associated vapor control device(s).
Emission Limitations: [40 CFR 63.10(e)(3)(vi)(E)]	10 mg/l
Monitor Manufacturer & Model #: [40 CFR 63.10(e)(3)(vi)(F)]	-
Date of Latest CMS Certification or Audit: [40 CFR 63.10(e)(3)(vi)(G)]	Not Available
Total Operating Time of Affected Source: [40 CFR 63.10(e)(3)(vi)(H)]	4344 hrs
Emissions Data Summary: [40 CFR 63.10(e)(3)(vi)(I)]	Not applicable to alternative CMS compliance methodologies.
CMS Data Summary: [40 CFR 63.10(e)(3)(vi)(J)]	Not applicable to Continuous Emission Monitoring Systems or Temperature Probe & Recorder Monitoring Systems.

Emission Data	CMS Performance Summary
1. Duration of excess emissions, exceedance, or excursion in reporting period due to:	1. CMS downtime in reporting period due to:
a. Startup/shutdown (in hours) _____	a. Monitor equipment malfunctions (in hours) _____
b. Control equipment problems (in hours) _____	b. Non-Monitor equipment malfunctions (in hours) _____
c. Process problems (in hours) _____	c. Quality assurance calibration (in hours) _____
d. Other known causes (in hours) _____	d. Other known causes (in hours) _____
e. Unknown causes (in hours) _____	e. Unknown causes (in hours) _____
2. Total duration, or number of excess emission, exceedance, or excursion (in hours) _____	2. Total CMS Downtime (in hours) <u>0</u>
3. Total duration or number ² (from 2 above) x (100) / [Total source operating time] <u>< 1%</u>	3. [Total CMS Downtime] x (100) / [Total source operating time] ⁴ <u>< 5%</u>

Description of Changes to CMS, Processes, or Controls:

[40 CFR 63.10(e)(3)(vi)(K)]

na

Have any excess emissions or process or control system parameter exceedances, OR CMS downtime, occurred during this reporting period? [40 CFR 63.11095(b)]

YES

NO

If 'Yes,' has the duration of the total excess emissions or process or control system parameter exceedances during the period exceeded one percent of the total operating time, OR CMS downtime for the reporting period been greater than five percent of the total operating time for the period? [40 CFR 63.10(e)(3)(vii)]

YES

NO

If 'Yes' to both of these questions, then pursuant to 40 CFR 63.10(e)(3)(viii) an 'Excess Emissions and Continuous Monitoring System Performance Report' must be included in addition to this Summary Report, and it must contain the information specified by 40 CFR 63.10(e)(3)(v).

¹ This report is not applicable to systems using "alternative" monitoring" methodologies allowed pursuant to 40 CFR 63.11092(b)(1)(i)(B) and (iii)(B).

MALFUNCTION REPORT¹

Malfunction Reporting pursuant to 40 CFR 63.11095(d).

During the reporting period, has the facility experienced a "malfunction" which caused or may have caused any applicable emission limitation to be exceeded?

NOTE: Those events meeting the definition of a "malfunction" were outlined in the Notification of Compliance Status and defined at 40 CFR 63.2?

YES

NO

If 'YES', provide the following information for each malfunction:

Total Number of Malfunctions during the Reporting Period: 0