

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

B904373495

FACILITY: CITGO PETROLEUM CORP		SRN / ID: B9043
LOCATION: 2233 S 3RD ST, NILES		DISTRICT: Kalamazoo
CITY: NILES		COUNTY: BERRIEN
CONTACT:		ACTIVITY DATE: 07/17/2024
STAFF: Chance Collins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection for FCE		
RESOLVED COMPLAINTS:		

On July 17, 2024, AQD staff traveled to Berrien County to perform an inspection of the CITGO Petroleum Corporation facility. The purpose of the inspection was to determine the facility's compliance with Permit to Install No. 42-05B. The facility is also subject to 40 CFR Part 63 Subpart BBBB (NESHAP for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities at area sources) and applicable state and federal air pollution control regulations. The AQD is not delegated to enforce 40 CFR Part 63 Subpart BBBB, therefore a compliance determination will not be made in regard to it.

AQD staff arrived on site at 10:15 a.m. to sunny conditions with a temperature of 77°F and a NW wind of 7 mph. There were no noticeable odors upon arrival. AQD staff met on-site with Bryon Shively (Terminal Manager) and Jim LaPorte (EHSS Manager) via phone conference (who walked staff around the facility and answered all questions. The following discusses the findings of the inspection and review of records:

***NOTE:** All requirements that are NA will not be discussed.

EULOADRACK

DESCRIPTION: Three-bay, twelve-arm loading rack with vapor combustion unit.

POLLUTION CONTROL EQUIPMENT: Vapor combustion unit

Emission Limit:

Pollutant	Limit	Time Period/Operating Scenario	Equipment
VOC	30 mg/L of organic compounds loaded	Hourly	EULOADRACK
VOC	43.3 tpy	12-month rolling time period as determined at the end of each calendar month	EULOADRACK

Facility appears to be in compliance. VOC emissions ranged from 16.34 tpy to 16.98 tpy which is well within limits.

Material Limit:

Material	Limit	Time Period/Operating Scenario	Equipment
Gasoline	244,700,000 gallons	12-month rolling time period as determined at the end of each calendar month	EULOADRACK
Distillate fuel oil	82,200,000 gallons	12-month rolling time period as determined at the end of each calendar month	EULOADRACK
Ethanol	24,400,000 gallons	12-month rolling time period as determined at the end of each calendar month	EULOADRACK

Facility appears to be in compliance.

Process/Operational Restrictions:

The permittee shall not load any organic compound through EULOADRACK unless all provisions of Rules 609 and 627 are met.

Facility appears to be in compliance.

Design/Equipment Parameters:

The permittee shall not operate EULOADRACK unless the vapor combustion unit is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes ensuring the presence of a flame in the vapor combustion unit during organic compound loading.

The facility appears to be in compliance.

Monitoring/Recordkeeping:

All records are being kept in a satisfactory manner. Facility appears to be in compliance.

Stack/Vent Restrictions:

All stack requirements appear to be met. Facility appears to be in compliance.

FGFUEL TANKS

DESCRIPTION: Internal floating roof tanks for storing gasoline or distillate fuel oil.

Emission Unit: EUTANK1, EUTANK2, EUTANK3, EUTANK4, EUTANK5

Emission Limit:

Pollutant	Limit	Time Period/Operating Scenario	Equipment
VOC	18.32 tpy	12-month rolling time period as determined at the end of each calendar month	FGFUEL TANKS

Facility appears to be in compliance. VOC emissions ranged between 16.34 tpy to 16.98 tpy.

Material Limit:

Material	Limit	Time Period/Operating Scenario	Equipment
Gasoline	244,700,000 gallons	12-month rolling time period as determined at the end of each calendar month	FGFUEL TANKS
Distillate fuel oil	82,200,000 gallons	12-month rolling time period as determined at the end of each calendar month	FGFUEL TANKS

Facility appears to be in compliance.

PROCESS/OPERATIONAL RESTRICTIONS:

1. The permittee shall not operate EUTANK1 unless all provisions of Rule 604 are met. (R 336.1604, R 336.1910)
2. The permittee shall not operate EUTANK2 unless all provisions of Rule 604 are met. (R 336.1604, R 336.1910)
3. The permittee shall not operate EUTANK5 unless all provisions of Rule 604 are met. (R 336.1604, R 336.1910)

Facility appears to be in compliance.

DESIGN/EQUIPMENT PARAMETERS:

1. The permittee shall not operate any tank in FGFUEL TANKS unless the tank's internal floating roof is installed, maintained, and operated in a satisfactory manner. (R 336.1205, R 336.1910, R 336.1702(b), 40 CFR Part 60 Subparts A & Kb)

Facility appears to be in compliance.

MONITORING/RECORDKEEPING:

1. The permittee shall monitor, in a satisfactory manner, the gasoline and distillate fuel oil throughput for FGFUEL TANKS on a monthly and 12-month rolling time period basis. (R 336.1205, R 336.1225)
2. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the gasoline and distillate fuel oil throughput for FGFUEL TANKS, as required by SC II.1 and II.2. The permittee shall keep these records on file for a period of at least five years and make the records available to the Department upon request. (R 336.1205, R 336.1225)
3. The permittee shall calculate the VOC emission rate from FGFUEL TANKS monthly, for the preceding 12-month rolling time period, using a method acceptable to the AQD District Supervisor. The permittee shall keep these records on file for a period of at least five years and make the records available to the Department upon request. (R 336.1205)

Facility appears to be in compliance.

FGETHANOLTANKS

DESCRIPTION: Fixed roof tanks for storing ethanol.

Emission Unit: EUTANK15, EUTANK16

Emission Limit:

Pollutant	Limit	Time Period/Operating Scenario	Equipment

VOC	1.24 tpy	12-month rolling time period as determined at the end of each calendar month	FGETHANOLTANKS
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Facility appears to be in compliance. VOC emissions ranged from 1.11 tpy to 1.12 tpy.

Material Limit:

Material	Limit	Time Period/Operating Scenario	Equipment
Ethanol	18,900,000 gallons	12-month rolling time period as determined at the end of each calendar month	FGETHANOLTANKS

Facility appears to be in compliance.

MONITORING/RECORDKEEPING:

1. The permittee shall keep, in a satisfactory manner, monthly and rolling 12-month time period records of the ethanol throughput for FGETHANOLTANKS, as required by SC II.1. The permittee shall keep these records on file for a period of at least five years and make the records available to the Department upon request. (R 336.1205)

2. The permittee shall calculate the VOC emission rate from FGETHANOLTANKS monthly, for the preceding 12-month rolling time period, using a method acceptable to the AQD District Supervisor. The permittee shall keep these records on file for a period of at least five years and make the records available to the Department upon request. (R 336.1205)

Facility appears to be in compliance.

FGFACILITY

DESCRIPTION: The following conditions apply source-wide to all process equipment including equipment covered by other permits, grand-fathered equipment, and exempt equipment.

Emission Limit:

Pollutant	Limit	Time Period/Operating Scenario	Equipment
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VOC	89 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY
Any individual HAP	8.9 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY
Total HAPs	22.4 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY

Facility appears to be in compliance. VOC emissions ranged from 35.51 tpy to 36.08 tpy. Individual HAP emissions were well within limits. Total HAP emissions were also well below the limit.

Monitoring/Recordkeeping:

The permittee shall calculate the VOC, individual HAP, and total HAPs emission rates from FGFACILITY monthly, for the preceding 12-month rolling time period, using a method acceptable to the AQD District Supervisor. The permittee shall keep these records on file for a period of at least five years and make the records available to the Department upon request. (R 336.1205(3))

Facility appears to be in compliance.

NAME 

DATE 7/17/2024

SUPERVISOR Monica Brothers