

B2987
MAWILA

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

B298728460

FACILITY: Buckeye Terminals, LLC - River Rouge Terminal		SRN / ID: B2987
LOCATION: 205 MARION AVE, RIVER ROUGE		DISTRICT: Detroit
CITY: RIVER ROUGE		COUNTY: WAYNE
CONTACT: Brad Crawford , Operation Manager		ACTIVITY DATE: 01/07/2015
STAFF: Terseer Hemben	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Bulk Petroleum Storage Terminal		
RESOLVED COMPLAINTS:		

Inspection

Buckeye Terminal, LLP.

205 Marion Street, River Rouge, MI 48218

Inspection: 1/7/2015

Present: Terseer Hemben, MDEQ – Air Quality Division
 Mark Smith, Buckeye - Operation Terminal Supervisor
 Mike Levine, Buckeye – Terminal Manager

Précis: The compliance review was based on the following Regulatory Rules:

Federal- 40 CFR 60, Subpart A & XX, and Kb GACT, 40 CFR 63.427

State- R 213, R 224, R 225, R 702, R910, R 911, R 604, R 609, R627,

Facility Description and Background:

The Buckeye Terminal BT, River Rouge Terminal is located at 205 Marion Industrial Avenue in River Rouge, Michigan. The facility lies about one quarter mile to the east of West Jefferson Avenue in a primarily industrial area. The nearest residences are approximately 225 yards to the northwest of the facility's truck loading rack. The facility receives a variety of petroleum products through pipelines and loads them into tank trucks using loading racks. The gasoline loading facility and some storage tanks require control equipment. Gasoline is bottom loaded into trucks that are connected to either the Vapor combustion Unit (John Zink design VCU) or vapor recovery unit (VRU) during loading. The facility is currently revamping the previously disengaged VRU with the shared intent to discontinue permanent use of VCU.

The facility consists of 35 major emission units. There is a seven-lane tank truck loading rack equipped with a vapor recovery system for control of VOC emissions. There are total of 33 storage tanks located on each side of Marion Avenue. Thirteen of the tanks are relatively small and are exempt from NSR permit requirements under rules R336.1284 (i) and R336.1285 (g). Tank designs include internal floating roof (IFR), external floating roof (EFR) equipped with weather covers, fixed cone roof, and the horizontal cylindrical type.

A variety of common petroleum products are received and stored at the facility. These products include gasoline, No.1 fuel oil, Jet fuels and diesel fuel. Ethanol, delivered by truck, are stored for blending into summer grade gasoline product.

Inspection Narrative

I arrived at the site on January 7, 2015, and was admitted onto the site at 1450 hours by Mr. Mark Smith. The purpose of visit was to conduct a scheduled annual compliance inspection. Temperature at the hour was 15 F with wind 10.4 mph coming from the WNW, and humidity 56%. The Terminal supervisor, Mr. Mark Smith introduced me to the Terminal manager, Mr. Mike Levine. Mike Levine and I went over a pre-inspection conference meeting agenda in conference/Training room. I explained the purpose and scope of the inspection in evaluating compliance consistent with conditions and requirements set in MI-ROP-B2987-2008a. I performed a visual inspection of facility emission units thereafter.

Discovery

During the pre-inspection meeting, Mr. Levine informed Buckeye was in process of installing the VRU as previously notified to AQD. In the mean time the facility put in service the portable VCU recently stack -tested for emissions compliance.

Permit # MI-ROP-B2987-2008a Conditions Evaluation For EULOADRACK Based on Conditions in PTI 189-12

1. In compliance – BT demonstrated there had been modification of process or equipment or system in the last 12 months. Response submitted by BT stated there had been a modification of equipment within the last 12 months. A Previously permitted replacement vapor Recovery Unit (VRU) was installed. The PTI authorizing modification containing use of portable VCU's stack dimensions is located in the Renewable Operating permit.

2. In compliance – BT demonstrated the VOC emissions from EULOADRACK did not exceed 10 mg/liter of gasoline loaded based on 6 hour test average [**S.C. I.1**] Records covering the last 12 months indicated the most recent Test report indicated the portable VCU showed emissions of 0.24 mg/L [Response Pg. 2, comment# 2, Appendix B].

3. In compliance- BT demonstrated the gasoline throughput in EULOADRACK did not exceed 850,000,000 gal/year based on 12-month rolling time period as determined at the end of each calendar [**SC II.1**]. Records submitted covering the last 12 months indicated the throughput was less than permitted as recorded 530,680,818 gallons/year [Appendix C, Pg. 10].

4. In compliance – BT demonstrated the distillate throughput in EULOADRACK did not exceed 300,000,000 gal/year based on 12-month rolling time period as determined at the end of each calendar [**SC II.2**]. Records submitted covering the last 12 months indicated the throughput was less than permitted as recorded 41,076,520 gallons/year [Appendix C, Pg. 9].

5. In compliance - BT demonstrated permittee complied with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and XX, as they apply to EULOADRACK.(40 CFR Part 60 Subparts A & XX) [**III.1**]. Records of emission calculations received from BT showed compliance in Trailer Vapor Tightness and Driver Agreement [Appendix E, and Appendix F].

6. In compliance – BT demonstrated permittee did not operate the petroleum product truck loading rack unless the vapor recovery system was installed and operating properly. (40 CFR 60.502, R336.1910 (1)). [**SC III.2**]. According to the Driver Agreement and loading procedure records, trucks were not loaded unless the EULOADRACK was installed and working properly as incorporated in the Malfunction Abatement Plan on AQD file [Appendix G and Appendix F].

7. In compliance - BT demonstrated permittee recorded identification number on each gasoline tank truck was loaded at the affected facility [**III.3**]. Truck identification records submitted by BT presented Buckeye Truck monitoring data supported compliance of the special condition [Appendix A].

8. In compliance -BT demonstrated permittee performed loading of liquid product into gasoline tank trucks limited to vapor-tight gasoline tank trucks using the following procedures:(40 CFR 60.502(e)) [**SC III.4**]. Records addressing the following specific requirements are located in Appendix H and Appendix E:-

- a) In compliance – BT demonstrated Permittee crosschecked each tank identification number obtained in Condition 3 with the file of tank truck vapor tightness documentation within two weeks after the corresponding tank was loaded. **(40 CFR 60.502(e) (3)) [SC III.4a]** BT stated the TMS would not allow a driver to load a trailer with expired certificate. Methodologically, the system requests the driver for trailer number and cross-checks for the current trailer certificate. The driver inserts data card into TMS, and the Trailer's request to load is rejected if certification is not current. [Response Pg. 4, Comment# 8a.]
- b) In compliance – BT demonstrated Permittee notified the owner or operator of each non vapor-tight gasoline tank truck loaded at the facility within three weeks after the loading had occurred. **(40 CFR 60.502(e) (4)) [SC III.4b]**. Response received from BT indicated the non-vapor-tight trailers were not loaded. Driver Agreement and loading procedure attached demonstrated compliance (Appendix F and Appendix E].
- c) In compliance – BT demonstrated permittee took steps assuring the non-vapor-tight gasoline tank truck was not reloaded at the facility until vapor tightness documentation for that tank was obtained. **(40 CFR 60.502(e) (5)) [SC III.4c]**. Response was same as in 8b.
- d) In compliance – BT demonstrated Permittee acted to assure that loading of gasoline tank trucks at the facility was made only into tank trucks that were compatible with the terminal's vapor collection system. **(40 CFR 60.502(f)) [III.4d]**. Response is same as in 8c.
9. In compliance - BT demonstrated permittee did not operate EULOADRACK unless the Malfunction Abatement Plan on file at the District Office, or an alternate plan approved by the AQD District Supervisor, was implemented and maintained. The MAP should be consistent with Rule 911(2). If the malfunction abatement plan failed to address or inadequately addressed an event that met the characteristics of a malfunction at the time the plan was initially developed, the owner or operator, by order of the AQD, revised the Malfunction Abatement Plan within the time specified in the order after such an event occurred and submitted the revised plan to the AQD District Supervisor. The revised plan should include procedures for maintaining and operating in a satisfactory manner, the Vapor Recovery Unit during malfunction events, and a program for corrective action for such events. **(R336.1911). [III.5]**. Records provided by BT included a copy of revised MAP for demonstration of compliance. The MAP was updated to include the replacement VRU with VCU, and Inspection plan under required 40 CFR 63 Subpart BBBBBB with NOCS [Appendix J].
10. In compliance - BT demonstrated permittee acted to assure the terminal and tank truck's vapor collection systems were connected during each loading of a gasoline tank truck at the facility. **(40 CFR 60.502(g)) [SC III.6]**. Compliance was demonstrated through presentation in Driver Agreement/Loading Procedure [Appendix F].
11. In compliance – BT demonstrated for each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline was inspected during the loading of gasoline tank trucks for the total organic compounds liquid or vapor leaks. For the purpose of this inspection, detection methods such as sight, sound or smell were acceptable. **(40 CFR 60. 502(j)) [III.7]**. BT indicated sight, sound and smell inspections of equipment in gasoline service were performed using LDAR form found in BEST [Appendix D].
12. In compliance - BT demonstrated permittee recorded each detection of a leak and the source of the leak repairs as soon as practicable but no later than fifteen (15) calendar days after the leak was detected **(40CFR 60.502(j)) [III.8]**. Records submitted by BT depicting compliance are located in the LDAR Log form [Appendix D].
13. In compliance – BT demonstrated permittee did not allow the loading of, any organic compound that had a true vapor pressure of more than 1.5 psia at actual conditions from any stationary vessel into any delivery vessel unless the delivery vessels were controlled by a vapor system that captured all displaced organic vapor and air by means of a vapor-tight collection line. (Compliance with this requirement should be considered compliance with compliance which had been subsumed under this streamlined

requirement. (40 CFR 60.502(a), 40 CFR Part 60, Subpart XX, R336.1609 (2)) [III.9]. Response received from BT indicated all loading at the facility were conducted using vapor system in operation. The Driver Agreement /Loading Procedure support compliance [Appendix F].

14. In compliance – BT demonstrated any delivery vessel located at the facility was equipped, maintained or controlled with an interlocking system or procedure to ensure that the vapor-tight collection line was connected before any organic compound was loaded. (R336.1609(3)(a) [III.10]. Response received from BT indicated each vapor hose was designed with a one way check valve to prevent the release of vapors. Also, the vapor hose had to be connected to the loading system before loading would take place [Response # 14, Comment# 14.].

15. In compliance – BT demonstrated there had been no visible leaks, except from the disconnection of bottom loading dry breaks and from raising top loading vapor heads, where a few drops were permitted. (R336.1627(7)) [III.11]. Response submitted by BT indicated visible leak inspections were performed using the LDAR form logged in BEST [Appendix D].

16. In compliance - BT demonstrated permittee did not allow gasoline to be handled in a manner that would result in vapor release to the atmosphere for extended periods of time. (Measures to be taken included, but were not limited to the following: (d)(R366.1225) [III.12(a), (b), (c), and). The following documents were provided and showed compliance:

a) In compliance – BT demonstrated control in spill prevention to minimize the gasoline spills [Appendix K]

b) In compliance – BT demonstrated control in clean up on spills as expeditiously as a practicable [Appendix K]

c) In compliance – BT demonstrated control in covering all open gasoline containers with a gasketed seal when not in use [Attachment F]

d) In compliance – BT demonstrated control in minimizing gasoline sent to open waste collection systems that collected and transported gasoline to reclamation and recycling devices, such as oil/water separators [Attachment F].

17. In compliance -BT demonstrated permittee developed written procedures for the operation of the above control measures and posted those procedures in an accessible and conspicuous location near the loading device. (R336.1609(4)) [III.13]. Response provided by BT indicated as part of the driver training program, all drivers were required to go through the procedures. The procedures were provided to show compliance [Appendix L].

18. In compliance –BT demonstrated permittee did not operate EULOADRACK unless the portable vapor combustion unit was located within the shaded area indicated on the site plan in Appendix 1. (R336.1225) [III.14]. The location of portable vapor combustion unit was visually confirmed.

19. In compliance – BT demonstrated, after June 30, 1981, it was unlawful for a person to load, or allow the loading of, any organic compound that has a true vapor pressure of more than 1.5 psia at actual conditions from any stationary vessel into any delivery vessel located at an existing loading facility which has a throughput of 5,000,000 or more gallons of such compounds per year, unless such delivery vessel was filled by a submerged fill pipe. (R336.1225, R336.1609(1)) [SC IV.1]. Response from BT stated loading at the facility was conducted with submerged fill pipe [Response #19, Comment# 19, Pg. 8].

20. In compliance –BT demonstrated each vapor collection system was designed to prevent any total organic compounds vapor collected at one loading rack from passing to another loading rack. (40 CFR 60.502(d)) [SC IV.2]. Response submitted by BT indicated the vapor collection system was designed to prevent any total organic compounds vapor collected at any one loading rack from passing to another loading rack [Response #20, Comment #20, Pg. #9].

21. In compliance- BT demonstrated the vapor collection and liquid loading equipment was designed and operated to prevent gauge pressure in a delivery tank from exceeding 450 mm of water during

product loading. (40 CFR 60 502(h)) [SC IV.3]. Response submitted by BT indicated the pressure valves on the vapor collection and liquid loading equipment were designed to prevent gauge pressure in a delivery tank from exceeding 450 mm of water during product loading. The set pressure of these valves was set by the manufacturer [Response #21, Comment # 21, Pg. #9]. Demonstration of compliance with this requirement is observed during performance testing campaign for measuring data analysis consistent with 40 CFR 60.503(d) [Appendix A & B].

22. In compliance - BT demonstrated no pressure vacuum-vent in the bulk gasoline terminal's vapor collection system opened at system pressure less than 450 mm of water. (40 CFR 60 502(i)) [SC IV.4]. Response provided by BT was along the same line with Response# 21 [Appendix A & B].

23. In compliance - BT demonstrated any delivery vessel located at the facility was equipped, maintained or controlled with a device to accomplish complete drainage before the loading device was disconnected or a device to prevent liquid drainage from the loading device when not in use. (R336.1609 (3)(c)) [SC IV.5]. Response from BT indicated each loading arm was equipped with a dry-break coupler that supported the Driver Agreement/Loading Procedure application for compliance demonstration [Attachment F].

24. In compliance – BT demonstrated any delivery vessel located at the facility was equipped, maintained or controlled with pressure vacuum relief valves that were vapor tight and set to prevent the emission of displaced organic vapor during the loading of the delivery vessel except under emergency conditions. (R336.1609(3)(d)) [SC VI. 6]. Response submitted by BT indicated the pressure vacuum relief valves on delivery vessels were vapor tight and tightness was documented through Trailer vapor Tightness certifications and loading procedure demonstrations [Appendix E and Appendix F].

25. In compliance –BT demonstrated any delivery vessel located at the facility was equipped, maintained or controlled with hatch openings that were kept closed and vapor-tight during the loading of the delivery vessel. (R336.1609(3)(d)) [SV IV. 7]. Response from BT indicated hatch openings on delivery vessels were kept closed and response was same as in #24.

26. In compliance – BT demonstrated the flare control system was equipped with a heat-sensing device, such as an ultraviolet beam sensor or a thermocouple was installed in proximity to the pilot light to indicate the presence of a flame. (40CFR 63.427(a)(4)) [SC IV. 8]. Response received from BT indicated the presence of thermocouple as heat sensing device was installed in the vent of VCU. Since the VRU was not in function, the pilot flame was no longer operational. Operation of the portable VCU was confirmed with daily check and interlock [Response # 26, Comment# 26, Pg. # 10].

27. In compliance - BT demonstrated the owner or operator of Buckeye River Rouge facility conducted performance tested and furnished the Administrator a written report of the results of such performance tests. The first test was performed within 180 days after permit issue and the second test should be within 6 months of the date of permit renewal (40 CFR 60.8(a)) [SC V.1] Records of test indicated the most recent performance test report was sent to AQD [Appendix B].

28. In compliance - BT demonstrated in conducting the performance tests required in 40 CFR 60, Section 60.8, the owner or operator used reference methods and procedures from the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided in Section 60.8(b). (The three-run requirement of Section 60.8(f) did not apply to this subpart. (40CFR60.503 (a))) [SC V. 2]. Records submitted by BT indicated the approved stack test protocol and performance test report was made available to AQD [Appendix M and Appendix B].

29. In compliance - BT demonstrated immediately before the performance test required to determine compliance with Sec. 60.502 (b), (c), and (h), the owner or operator used Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck was being loaded. The owner or operator should repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test. (40 CFR 60.503(b)) [SC V. 3]. Response received from BT indicated the most recent performance test was made available to AQD and stated no leakage in excess of 500 ppm were detected [Appendix B].

30. In compliance –BT demonstrated the owner or operator of an affected facility provided the administrator at least 30 days prior notice of any performance test, except as specified under other subparts, to afford the administrator the opportunity to have an observer present. (40 CFR 60.8(d)) [SC V. 4]. Response submitted by BT indicated the approved protocol was submitted to AQD [Appendix M].

31. In compliance - BT demonstrated that compliance with standards in this part, other than opacity standards, was determined in accordance with performance tests established by section 60.8 unless otherwise specified in the applicable standard. (40CFR 60.11(a)) [SC V. 5]. Response received from BT indicated the recent performance Test report was submitted to AQD. The testing methods used included Methods 2A, 2B, 10, 3A, 21, 25B, and 40 CFR 60.503(d) [Appendix B].

32. In compliance - BT demonstrated the permittee kept records of the EULOADRACK throughput volume of each specific petroleum product for each calendar month and each 12-month rolling time period. All records were kept on file for a period of at least five years and made available to the Department upon request. (R336.1225) [SC VI.1]. Response received from BT indicated a report from BEST, Buckeye's Tank emissions and management system was submitted to AQD [Appendix C].

33. In compliance - BT demonstrated permittee maintained records of the results of the inspections performed as applicable requirements by rule (R336.1627) [SC VI.2]. Response submitted by BT indicated the vapor Trailer vapor Tightness Certification example was submitted to AQD [Appendix E].

34. In compliance - BT demonstrated permittee kept records of all replacements or additions of components performed on an existing vapor processing system for at least 5 years. (40 CFR 60. 505 (f)) [SC VI.3]. Response received from BT indicated no replacements or additions of components were made to the PVCU. Staff observed the VRU was under renovation as previously informed by BT in a letter that is on AQD file [Response #34, Comment# 34, Pg.# 13].

35. In compliance – BT demonstrated permittee kept documentation of all notifications required under section 60.502(e)(4) on file at the terminal for five years. (40 CFR 60.505 (d)) [SC VI.4] Response from BT indicated non vapor-tight trailers were not loaded. Records were kept on file in electronic format [Appendix F].

36. In compliance- BT demonstrated for facilities that utilize a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection by permitting authority representatives during the course of a site visit, or within a mutually agreeable time frame. (40 CFR Part 60 Subpart XX) [SC VI.5]. Appendix F presented basis for compliance observed in BT operation:

a. In compliance – BT demonstrated compliance by providing a copy of each record in paragraph (e)(2) of this section that was an exact duplicate image of the original paper record with certifying signatures. [Appendix F].

b. In compliance –BT demonstrated the permitting authority was notified in writing that each terminal using this alternative was in compliance with paragraph (e)(2) of this section [Appendix H and Appendix E].

37. In compliance – BT demonstrated the documentation file for each gasoline tank truck was updated at least once per year to reflect current test results as determined by Method 27. This documentation should include, as a minimum, the following information:[SC VI.6 (1), (2), (3), (4), (5), (6), (7), and (8) parts]: Records received from BT confirmed the operations in Trailer Vapor Tightness equipment [Appendix E].

(1) Test title: Gasoline Delivery Tank Pressure Test-EPA Reference Method 27.

(2) Tank owner and address.

(3) Tank identification number.

(4) Testing location.

(5) Date of test.

(6) Tester name and signature.

(7) Witnessing inspector, if any: Name, signature, and affiliation.

(8) Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs).

(40 CFR 60.505 (b)).

38. In compliance – BT demonstrated records of each monthly leak inspections required under Section 60.502(j) were kept on file at the terminal for at least 5 years. Inspection records included, as a minimum, the following information: **[SC VI. 7(1), (2), (3), (4), and (5)]**. **Records covering the last 12 months illustrated compliance:**

(1) In compliance - Date of inspection [Appendix E].

(2) In compliance - Findings (may indicate no leaks discovered; or location, nature, and severity of each leak) [Appendix E].

(3) In compliance – Leak determination method [Appendix E].

(4) In compliance - Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days) [Appendix E].

(5) In compliance - Inspector name and signature **(40 CFR 60.505 (c))**

39. In compliance – BT demonstrated the terminal owner or operator kept documentation of all notifications required under Section 60.502(e)(4) on file at the terminal for at least 5 years. (40 CFR 60.505 (d)) [SC VI.8] Inspection records and leak records were located in LDAR log Form [Appendix H and Appendix E].

40. In compliance - Demonstrated as an alternative to keeping records at the terminal of each gasoline cargo tank test result as required in paragraphs (a), (c), and (d) of this section, an owner or operator complied with the requirements in either paragraph (1) or (2) as follows: (40 CFR 60.505(e)). [SC VI.9 (1) (i) & (ii); (2) (i) & (ii)]. Records submitted by BT showed compliance [Appendix F, Appendix H, and Appendix E].

(1) An electronic copy of each record was instantly available at the terminal:

(i) The copy of each record in paragraph (1) of this section was an exact duplicate image of the original paper record with certifying signatures.

(ii) The permitting authority was notified in writing that each terminal using this alternative was in compliance with paragraph (1) (i) of this section.

(2) For facilities that utilize terminal automation system to prevent gasoline cargo tanks that does not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation was made available (e.g., via facsimile) for inspection by permitting authority representatives during the course of a site visit, or within a mutually agreeable time frame.

(i) The copy of each record in paragraph (e) (2) of this section was an exact duplicate image of the original paper record with certifying signatures.

(ii) The permitting authority was notified in writing that each terminal using this alternative was in compliance with paragraph (e) (2) of this section.

41. In compliance – BT demonstrated the permittee notified the Department if a change in land use occurred for property classified as industrial or as a public roadway, where this classification was relied upon to demonstrate compliance with Rule 225(1). The permittee should have submitted the notification to the AQD District Supervisor, within 30 days of the actual land use change. Within 60 days of the land use change, the permittee should submit to the AQD District Supervisor a plan for complying with the requirements of Rule 225(1). The plan should require compliance with Rule 225(1) no later than one year after the due date of the plan submittal (R 336.1225(4)) [SC VII.1]. Response from BT indicated no change in land use occurred in the Company operations. [Response #41, Comment #41, Pg. #17].

42. In compliance- BT verified the exhaust gases from the stacks listed in the table below were discharged unobstructed vertically upwards to the ambient air unless otherwise noted: [SC VIII]. Conduct visual inspection on stack dimensions as follows: **Stack Requirements**

1. SVVRU 12 inches, & 22 feet above ground1 (R336.1225)

2. SV PERMANENTVCU 8 inches, & 45 feet (R336.1225)

3. SV PORTABLEVCU 8.5 inches, & 13 feet (R336.1225). Response received from BT indicated visual inspections were conducted. Control device outlets met minimum diameter requirements[Response# 42, Comment# 42, Pg. #17]. However, the configuration of the SV-PORTABLEVCU was different from conventional. The system consisted of a horizontally cylindrical vapor combustion chamber designed with a diameter greater than 8.5 inches with a vent cut on one end for vertical discharge of gaseous combustion products. The vapor combustion equipment was raised to the height of 13 feet from the base with supporting legs. There was no conventional stack over the vent directing vertical discharge of gases to the ambient air.

DESCRIPTION; Tank 57

43. In compliance -BT demonstrated tank 57 with withholding capacity 3,208,000 gallons vertical fixed roof

tank was not loaded with contents of less than 3.5 kpa (0.5 psia) vapor pressure. Records submitted by BT indicated the vapor pressure of distillate was 0.0056 psia [Appendix C].

44. In compliance – Noted: After April 30, 1981, it has been unlawful for a person to store any organic compound having a true vapor pressure of more than 1.5 psia, but less than 11 psia, at actual storage conditions in any existing fixed roof stationary vessel of more than 40,000-gallon capacity. BT demonstrated compliance with this requirement (R 336.1604(1)). [SC III.1]. Records submitted by BT indicated compliance [Appendix C].

45. In comp-liance – BT- demonstrated the permittee stored in EUTANK57 materials that have a true vapor pressure of 0.5 psia or less (Condition accepted by the permittee to avoid becoming subject to 40 CFR 60, Subpart Kb) [336.1213(3)]. [SC III.2] Records submitted confirmed [Appendix C].

46. In compliance - BT demonstrated daily records of the vapor pressure of the contents of EUTANK57 were maintained to demonstrate compliance with the 0.5 psia maximum vapor pressure limitation (R 336.1213(3))[VI.1]. Records summarizing the vapor pressure taken for the last 30 days are located in Appendix C.

47. In compliance-BT demonstrated the recordkeeping of type and temperature of the stored material in the tank as a requirement equivalent to measuring true vapor pressure was kept on file (40 CFR 60.116) (b)(c) [VI.2]. Request records for the last 12 months.

Note:

1. In compliance - Subpart Kb, 40 CFR 60 should not apply to EUTANK57 because the applicant accepted the limitation of storing organic compounds which have vapor pressure not exceeding 0.5 psia (R 336.1604(1)), (336.1213(2)). BT submitted that only distillate having vapor pressure less than 0.5 psia was stored in EUTANK57 [Response #47, Comment #47, Pg. #19].

48. In compliance – BT demonstrated the gasoline storage tank complied with the requirements of 40 CFR, Part 60, Subpart Kb, sections 60.112b (a)(1), 60.113b(a), 60.115(a), 60.116(a) and (c). Records submitted by BT included annual inspection forms for TANKS 12, 22, and 56 [Appendix N].

The vapor tight collection line was in place and temporary VCU system was installed and functioned properly. Provisions in the form of an automatic lock-out apparatus to prevent the loading of any tank truck which had not been tested, or had not passed the vapor tightness certification test were in place and working properly. Records of the monthly sight, smell and sound inspections of this equipment were made available. The operation of the control measures for the truck loading control were accessible and posted in a conspicuous location in each truck lane.

The facility has a malfunction abatement plan on site.

STORAGE TANKS

Tanks at the facility are divided into four categories:

NSPS subject based upon size and use

Fixed roof and use

Fixed roof and internal floating roof

Specialty, considering size and use

MAERS REPORT

MAERS report for the 2014 was reviewed and determined to be in compliance.

CONCLUSION

The inspection was conducted t BT facility in River Rouge. Data or information on physical plant equipment examined indicated that BT River Rouge Terminal operated in compliance with conditions and requirements of MI-ROP-B2987-2008a. The hygiene on site was satisfactory. There were no littering or open cans with organic liquids on site. The remediated zone was satisfactorily maintained. However, the overall compliance will be assessed during the next inspection visit detailing compliance on SOURCE-WIDE, FGGASNSPS, FGGASTANKS, FGDISTANKS, FGFIXEDROOFTANKS, FGCOLDCLEANERS and FGAIRSTRIPPERS after the renewed ROP is approved.

NAME

fh

DATE

9/11/15

SUPERVISOR

JK