



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT FIELD OFFICE



DAN WYANT  
DIRECTOR

November 18, 2013

Mr. Mark Smith  
Buckeye Terminal, LLC  
205 Marion Avenue  
River Rouge, MI 48218

SRN: B2987, Wayne County

Dear Mr. Smith:

**VIOLATION NOTICE**

On November 6, 2013, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Buckeye Terminals, LLC-River Rouge Terminal located at 205 Marion Ave, River Rouge, Michigan. The purpose of this inspection was to determine emissions compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules and the conditions of Renewable Operating Permit (ROP) number PTI-189-12.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Emission Unit, EULOADRACK with a vapor combustion unit.	PTI-189-12, Table-EULOADRACK, Conditions VIII.3 and IX.1; Rule 225 and Rule 901	Operated EULOADRACK and portable Vapor Combustion Unit without a Stack.

On November 6, 2013, the AQD staff observed operation of EULOADRACK and portable VCU while the Stack was off line.

(a) Rule 225, and PTI-189-12 condition VIII.3 (Stack/Vent restriction), require the EULOADRACK and vapor combustion unit to be operated using a stack with maximum exhaust diameter 8.5 inches and 13 feet minimum height above ground; and

(b) Rule 901, and PTI-189-12, Table EULOADRACK, Condition IX.1, require that at all times, including periods of startup, shut down, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by December 9, 2013 (which coincides with 21


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calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Buckeye Terminals, LLC-River Rouge Terminal believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of Buckeye Terminals, LLC-River Rouge EULOADRACK and Portable Vapor Combustion Unit. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Terseer Hemben  
Environmental Engineer  
Air Quality Division  
313-456-4677

cc via email: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Wilhemina McLemore, DEQ