



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

May 17, 2017

Mr. Eric Kuczewski
Buckeye Partners, L.P.
12451 Old US 27 South
Marshall, Michigan 49068

SRN: B9052, Calhoun County

Dear Mr. Kuczewski:

VIOLATION NOTICE

On April 19, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Buckeye Partners, L.P. (Facility), located at 12451 Old US 27 South, Marshall, Michigan. The purpose of this inspection was to determine the Facility's 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; the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) No. 387-94C and 152-09.

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Tanks 28-1 and 28-3 storage modification; installation of Tanks 10 and 11	Rule 201/PTI No. 387-94C	In 2006, the Facility converted Tanks 28-1 and 28-3 from gasoline storage to ethanol and ultra-low sulfur diesel (ULSD) fuel. In 2006, the Facility also installed Tank 10 to store ULSD lubricity additive and Tank 11 to store diesel dye additive.
Soil Vapor Extraction (SVE) system	PTI No. 152-09, Condition III.1.c	The SVE uses catalytic oxidizer controls and is required to meet a minimum of 98% reduction efficiency of hydrocarbon emissions to the atmosphere. Based on a review of provided quarterly emission records for March 2016 through March 2017, the reduction efficiency ranged between 53% and 80%.
Groundwater Pump and Treat (GWPT) system	PTI No. 152-09, Condition III.1.a	The GWPT uses an air stripper with a dual stage activated carbon system and is required to meet a

		minimum of 95% reduction efficiency of hydrocarbon emissions to the atmosphere. Based on a review of provided biweekly photoionization detector monitoring records for 1/27/17 through 3/23/17, the reduction efficiency ranged between 79% and 93%.
GWPT system	PTI No. 152-09, Condition VI.3	The permittee is required to monitor dual-stage activated carbon system for breakthrough on a biweekly basis. The permittee shall not operate the system once breakthrough occurs without carbon change out, and breakthrough is considered to occur when the reading between the first and second canister is 20% or more of the influent volatile organic compound concentration. A review of provided carbon monitoring records indicates that the mid-carbon unit organic concentration exceeded the 20% breakthrough limit on 2/9/17 (21%), 03/14/17 (39%), and 3/23/17 (22%).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 6, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If the Facility 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 violations cited above and for the cooperation that was extended to me during my inspection of the Facility.

Mr. Eric Kuczewski
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If you have any questions regarding the violations or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Rex I. Lane
Senior Environmental Quality Analyst
Air Quality Division
269-567-3547

RIL:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ