



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
KALAMAZOO DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

July 19, 2021

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

SRN: B9052, Calhoun County

Dear Mr. Kuczewski:

VIOLATION NOTICE

On June 29, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Buckeye Terminals, LLC 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 (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 387-94D and 152-09.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Dual Stage Granulated Activated Carbon System	PTI No.152-09 Special Condition IV.3	The activated carbon system is required to meet a minimum of 95% reduction efficiency of hydrocarbon to the atmosphere. Based on a review of the provided photoionization detector monitoring (PID), the system did not meet the requirements on 10/16/20 and 2/4/21 with efficiencies of 89.4% and 83.7% respectively.
Dual Stage Granulated Activated Carbon System	PTI No. 152-09 Special Condition VI.3	The permittee is required to monitor for breakthrough on a biweekly basis. Records provided show the

		monitoring frequency of breakthrough is currently done every other month.
Dual Stage Granulated Activated Carbon System	PTI No. 152-09 Special Condition VI.3	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 VOC concentration. A review of the PID records indicate that the unit exceeded the 20% breakthrough limit on 6/22/20, 12/21/20, 1/25/21, 2/4/21, and 2/25/21 with the highest exceedance being 46.5%.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 9, 2021 (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 {Select One}; 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.

Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Buckeye Partners, LP. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in cursive script, appearing to read "Amanda Chapel".

Amanda Chapel
Senior Environmental Quality Analyst
Air Quality Division
(269) 910-2109

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olague, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Rex Lane, EGLE