

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

M409729923

FACILITY: Marathon Pipe Line LLC		SRN / ID: M4097
LOCATION: 2499 GRIMES RD, STOCKBRIDGE		DISTRICT: Lansing
CITY: STOCKBRIDGE		COUNTY: INGHAM
CONTACT: Todd Scarborough , Sr. HES Professional/Air Coordinator		ACTIVITY DATE: 06/25/2015
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection of facility which was last inspected in 2011.		
RESOLVED COMPLAINTS:		

On 6/25/2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted a scheduled inspection of Marathon Pipe Line LLC's Stockbridge facility.

Environmental contact:

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Raymond W. Price, Area Manager; 734-676-7775 ext. 17; rwprice@marathonpetroleum.com

Rachel Wisman, Site Operator, Arcadis; Rachel.wisman@arcadis-us.com

Facility description:

The facility is considered a pipeline breakout facility. It includes a gasoline storage tank, and an air stripping process, to remediate a past gasoline spill.

Emission units:

Tank #681, an 188,000 barrel internal floating roof (IFR) tank, Permit to Install (PTI) No. 58-00

Remediation process, Rule 285(w)

Regulatory overview:

This facility is considered a true minor source, because it does not have the potential to emit (PTE) of 100 tons per year (TPY) or more of one or more of the criteria pollutants, nor does it have the PTE to emit 10 TPY or more of a single Hazardous Air Pollutant (HAP), or 25 TPY or more of total HAPs. The criteria pollutants are those for which there is a National Ambient Air Quality Standard: carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds (VOCs) lead, particulate matter smaller than 10 microns in diameter (PM-10), or particulate matter smaller than 2.5 microns in diameter (PM2.5).

This facility is subject to 40 CFR Part 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. Because this is a pipeline breakout facility, it is also subject to 40 CFR Part 63, Subpart BBBBBB, National Emissions Standards for Hazardous Air Pollutants for Source category: Gasoline Distribution Bulk terminals, Bulk Plants, and Pipeline Facilities.

Tank #681 is covered by PTI No. 58-00. The remediation process was once covered by PTI No. 118-11. The permit was voided because a soil evacuation process was never installed, and the remaining permitted equipment, an air stripping system, was considered exempt.

Fee status:

This facility is not considered a Category I fee source, because it is not a major source, for either criteria pollutants, or HAPs. This facility is considered category II, for being subject to the NSPS. This facility reports to the Michigan Air Emission Reporting System (MAERS), on an annual basis.

Location:

Marathon Pipe Line LLC's Stockbridge facility is located on Grimes Road, between White Oak and Stockbridge Townships in Ingham County. The single tank operated by Marathon Pipeline is located on Wolverine Pipeline property, which is adjacent to Enbridge Pipeline property, immediately to the south. The location is rural, although there are a number of residences in the area.

Recent history:

In early 2011, gasoline was discovered in a ditch near the Wolverine location. A leaking flange was discovered on tank #681, and Marathon took responsibility for the spill. The scope of the spill was estimated upwards of 500,000 gallons, and Marathon Pipeline hired Arcadis to manage the remediation. The PTI No.118-11 for the remediation process was voided on 6/17/2015, following a 5/20/2015 discussion between the company, AQD Permit Engineer Nick Zabrodsky, and myself, because it was agreed that the process satisfied the exemption criteria.

Arrival:

This inspection was arranged in advance, as there is not always someone stationed at the facility. I arrived at about 10:07 AM, at Gate 6, which was near the northwest corner of the site. I met with Mr. Todd Scarborough, Sr. HES Professional/Air Coordinator, and Mr. Raymond W. Price, Area Manager. I provided Mr. Scarborough with a copy of the DEQ brochure *Environmental Inspections: Rights and Responsibilities*, per AQD procedures. Per an e-mailed recommendation from Mr. Scarborough on appropriate safety gear, I was wearing fire retardant coveralls, when I arrived at the site.

Inspection:

This was my first visit to this pipeline breakout facility. I was informed that the pipeline and the property belong to Wolverine, along with three storage tanks. Marathon owns and operates the fourth tank, #681, and a couple of valves at the site. It was explained to me that tank #681 is for storage of 84 octane gasoline, generally for the short term. The tank helps balance refinery output with terminal demands, I was informed. The environmental consulting firm Arcadis manages the remediation process at the site.

The only odors I noted while on Marathon property were at the entrance gate, gate 6. Weather conditions were 65 degrees F, cloudy, and humid, with a breeze out of the southeast at 0-5 miles per hour. This appeared to indicate that the odor came not from Marathon's tank #681, but an adjacent facility.

Tank #681, PTI No. 58-00:

Tank #681 contains 84 octane gasoline, I was informed. I did not see any visible emissions nor detect and odors from tank #681. The supporting documentation to their MAERS report for the 2014 calendar year (attached for reference), on page 1 of a TANKS 4.0.9d Emissions Report - Detail Format identifies the volume of the tank as 6,908,412.00 gallons.

I detected no odors from tank #681, nor any visible emissions. The tank appeared to be well maintained.

Special Condition (SC) No. 1 of PTI No. 58-00 limits the VOC emission rate from tank #681 to 8.0 TPY, based on a 12-month rolling time period as determined at the end of each calendar month. Total emissions reported to MAERS for tank #681 for the 2014 operating year were 13,696.9 lbs, or 6.85 tons, below the permitted limit. Of that total, 91.60 lbs VOC were attributed to the remediation process.

SC No. 2 of PTI No. 58-00 limits throughput of gasoline to no more than 710,640,000 gallons per year. Based on the data reported to MAERS for the 2014 operating year, the yearly throughput was 276,444,000 gallons, below the permitted amount.

SC No. 3 of PTI No. 58-00 prohibits the applicant from storing any petroleum product with a vapor pressure greater than 1.5 psia unless the tank is equipped with an internal floating roof with seal. It is my understanding that the internal floating roof has a mechanical shoe seal.

SC No. 4 states that monitoring and recording of emissions and operating information is required to comply with 40 CFR Part 60, Subpart A and Kb. I was provided with an electronic spreadsheet detailing emissions and operating /maintenance information, which is discussed later in this report, under "Review of facility recordkeeping."

Remediation process (air stripping); Rule 285(w):

Rule 285(w) exempts from the need to obtain an air use permit:

Air strippers controlled by an appropriately designed and operated carbon adsorption or incineration system that is used exclusively for the cleanup of gasoline, fuel oil, natural gas condensate, and crude oil spills.

We met with Ms. Rachel Wisman, of Arcadis, who is the site operator for the remediation process. The air stripping process was not running at the moment. Ms. Wisman informed me that when it is running, she has never detected any visible emissions from the unit. The air stripping process is controlled by a CatOx system, Ms. Wisman explained, and the heating bed consists of nine (9) 3000 watt cartridge heaters arranged in a delta configuration, she indicated. The dissolved gasoline in water is referred to as Liquid Non-Aqueous Phase Liquid (LNAPL), I was informed.

There are a number of wells at the site which are being monitored. Not all of the wells have a high enough concentration for the gasoline to effectively be recovered. A pneumatic pump pumps gasoline and water into a steel tank. It is my understanding that a catalytic oxidizer unit recovers the gasoline, and burns off vapors. They monitor the catalytic oxidizer's entrance temperature, bed temperature, and exit temperature, I was informed. I was also informed that the monitoring is done every 15 minutes, and staff are e-mailed at night, if anything unusual is detected.


Review of facility recordkeeping:

Mr. Scarborough provided a spreadsheet electronically. They explained that to print it out would be extremely cumbersome, because it would fill up numerous binders. The spreadsheet includes maintenance checks required by 40 CFR Part 63, Subpart BBBB. They also submit a semi-annual report required by BBBB, which AQD reviews.

My audit of their facility's MAERS report for the 2014 operating year found the report to be timely, complete, and acceptable. Emissions from the remediation process are attributed to emission unit EU-TANK#681. The report for the 2014 operating year included a table (the first page of the attached MAERS documentation) that showed that the total VOC emissions for 2014 from the remediation process were 91.60 lbs. The VOC TPY over a 12-month rolling time period reached their highest point in 2014 at 0.16 TPY, in January, 2014. The limit in PTI No. 118-11 for 12-month rolling TPY VOC was 11.9 tons, but the permit has been voided, so the limit is no longer applicable.

Conclusion:

I did not identify any instances of noncompliance with PTI No. 58-00, the Michigan Air Pollution Control Rules, 40 CFR Part 60, Subpart Kb, nor 40 CFR Part 63, Subpart BBBB. I left the site at 12:07 PM.

NAME 

DATE 8/31/2015

SUPERVISOR 

