



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

August 6, 2019

Mr. Brad Crawford  
Buckeye Terminals, LLC  
205 Marion Avenue  
River Rouge, MI 48218

SRN: B2987, Wayne County

Dear Mr. Crawford:

**VIOLATION NOTICE**

On June 12, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Buckeye Terminals, LLC located at 205 Marion Avenue, River Rouge, Michigan. The purpose of this inspection was to determine Buckeye Terminals, LLC'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 Renewable Operating Permit (ROP) number MI-ROP-B2987-2016.

During the records review following the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated        | Comments  |
|---------------------|---------------------------------------|---|
| EULOADRACK          | MI-ROP-B2987-2016, EULOADRACK, SC V.1 | The facility failed to verify the VOC emission rate from EULOADRACK within the period from March 1, 2016 through March 1, 2017. |

Special Condition (SC) V.1 for EULOADRACK requires Buckeye Terminals, LLC to verify the volatile organic compound (VOC) emission rate from EULOADRACK, by testing, in accordance with Department requirements within 365 days of the issuance date of MI-ROP-B2987-2016, which was March 1, 2016. Buckeye Terminals, LLC indicated that the most recent testing of the Vapor Recovery Unit (VRU) located at the Buckeye River Rouge Terminal was on April 22, 2015. Therefore, Buckeye Terminals, LLC is in violation of MI-ROP-B2987-2016, for EULOADRACK, SC V.1.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 27, 2019 (which coincides with 21 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

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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.

Please submit the written response to EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Buckeye Terminals, LLC 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 June 12, 2019. 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,



Ms. Nazaret Sandoval  
Environmental Engineer  
Air Quality Division  
313 456-4680

cc: Ms. Kimberly Trostel, Buckeye  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Wilhemina McLemore, EGLE  
Mr. Jeffrey Korniski, EGLE