

VOLATILE ORGANIC COMPOUND EMISSION TEST REPORT

B9181

OF

SUNOCO LOGISTICS

OWOSSO TRANSPORT LOADING TERMINAL  
OWOSSO, MICHIGAN

ON THE

VAPOR COMBUSTION UNIT

June 4, 2014

**Terminal Info:** Sunoco Logistics  
4004 W Main St.  
Owosso, MI 48867  
Phone: (989) 723-6781

DEQ AQD LANSING D.O.

**Performed By:** Jordan Technologies  
5051 Commerce Crossings Drive  
Louisville, Kentucky 40229

JUL 11 2014

**Test Personnel:** Tony Fenton  
Phone: (502) 267-8344  
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<u>TEST PARAMETER</u>	<u>MEASURED VALUE</u>	<u>REQUIRED VALUE</u>
VOC Emissions	27.25 mg/liter	80 mg/liter
Pounds/1,000 gal	0.23 lbs/1,000 gal	1 lbs/1,000 gal



## DECLARATION OF ACCURACY

**Certification of sampling procedures by the team leader of the personnel conducting the sampling procedures and compiling the test report:**

"I certify that the sampling procedures were performed in accordance with the approved test plan and that the data presented in this report are, to the best of my knowledge and belief, true, accurate, and complete. All exceptions are listed and explained below."

Signature: Tony Fenton

Printed Name of Person Signing: Tony Fenton

Title: Manager, Environmental Testing Division

Date: 6/19/14

**Certification of test report by the senior staff person at the company who is responsible for checking the test report:**

"I certify that this test report and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the test information submitted. Based on my inquiry of the person or persons who performed sampling and analysis relating to the performance test, the information submitted in this test report is, to the best of my knowledge and belief, true, accurate, and complete. All exceptions are listed and explained below."

Signature: James Stamm

Printed Name of Person Signing: James Stamm, P.E.

Title: Sr. Environmental Engineer

Date: 6/19/14

### Deviations from SOP

1. No deviations noted during testing

## EXECUTIVE SUMMARY

The Sunoco Logistics terminal in Owosso, Michigan is a bulk transport loading facility for Gasoline and Fuel Oil Products.

The products are bottom loaded into transport tankers and the displaced hydrocarbon vapors are balanced to a JOHN ZINK VAPOR COMBUSTION UNIT (VCU).

This facility was source tested for air emissions on June 4, 2014. The purpose of this test was to confirm proper operation of the VCU and verify compliance with applicable VOC (Volatile Organic Compound) air emission requirements

The Gasoline Terminal Air Emission Source Test was conducted in accordance with procedures established, and the test methods referenced, in the Code of Federal Regulations; CFR 40, Part 60, Subpart XX and CFR 40, Part 63, Subpart BBBB. Specific procedures used include:

<u>EPA TEST METHOD</u>	<u>MEASUREMENT</u>
Method 2A	Inlet Vapor Volume into VCU
Method 2B	Exhaust Vapor Volume from VCU
Method 10	Exhaust CO Concentration
Method 3A	Exhaust CO <sub>2</sub> Concentration
Method 21	Potential Leak Sources (500 PPM Leak Rate)
Method 25B	Inlet and Outlet VOC Concentrations
40 CFR 60 Subsection 60.503 (d)	Transport Loading Maximum Backpressure

The results of this air emission test demonstrate that this source is in compliance with the applicable Federal and Local requirements. A summary of the data is presented below:

<u>TEST PARAMETER</u>	<u>MEASURED VALUE</u>	<u>REQUIRED VALUE</u>
VOC Emissions	27.25 mg/liter	80 mg/liter
Pounds/1,000gal	0.23 lbs/1,000gal	1 lbs/1,000gal

The Method 21 Leak Test was performed on the day prior to testing. A portable LEL meter was calibrated using a 500 PPM methane calibration gas. The meter was used to check for leaks around all fittings, flanges, valves as well as any other exposed potential leak source. No leaks were found in excess of 500 ppm.

## TERMINAL OPERATION AND DESCRIPTION

Light petroleum products are bottom loaded at two loading bays at the Sunoco Logistics Owosso, Michigan facility.

The terminal is equipped to load three grades of gasoline including: Regular, Midgrade and Premium Unleaded Gasoline. The terminal is also equipped to load Diesel Fuel and Heating Oil onto transports as well.

The truck loading rack is equipped with vapor recovery hoses positioned at the transport loading positions for hook up to the Vapor Combustion System. All trucks that load must connect the vapor recovery hose before loading liquid product.

The vapor hoses have individual check valves that prevent unused hoses from leaking any vapors. The vapor pipe manifold connects the vapor hoses to the VCU. The vapor pipe system also employs a liquid condensate accumulator, flame arrester and pressure/vacuum relief valve upstream from the VCU.

## VAPOR COMBUSTION UNIT DESCRIPTION

A brief description of the vapor combustion unit (VCU) process is presented below. For a detailed description, please consult the manufacturer's equipment manual.

The VCU consists of the following components:

- Vertical combustion stack with louvers.
- Primary air blower
- Non-flashback burner assembly
- Pilot burner
- Various electric and mechanical controls required for proper and safe operation.

The incoming hydrocarbon vapors from the truck loading facility are mixed with primary combustion air and then ignited by a natural gas (propane) fueled pilot burner. Secondary combustion air is mixed with the combustion products as they continue through the firebox and ultimately vent to the atmosphere at the top of the vertical stack.

The VCU has an interlock to prevent the venting of vapors to the VCU prior to it being in an operating mode. When a tank truck enters the loading rack, a vapor line is attached to the tank truck to move hydrocarbon vapors to the VCU. Before the truck can be loaded, the VCU must provide a signal indicating that it is ready to receive vapors.

When the interlock is satisfied, the VCU turns on and purges the stack with the primary combustion air blower. This step is a safety requirement to remove any residual vapors that may be present in the stack before lighting the pilot. Once the pilot is lit and proven, the VCU returns the required "Ready to Load" signal to the truck load rack. As the truck loads liquid gasoline, the displacement pressure pushes the hydrocarbon vapors from the truck to the VCU for combustion. The vapor pipe contains a small condensate accumulator to prevent any thermal condensation liquid to reach the burner assembly and also a flame arrester for safety. A moderate increase in vapor line pressure opens a flow control valve allowing the vapors to pass to the burner of the VCU.

During the operation of the VCU, the primary combustion air blower introduces fresh air to the hydrocarbon/air vapor mix in front of the burner. The vapors are passed through the burner assembly and oxidized. The VCU stack is sized to contain the vapor combustion zone in which the vapor combustion continues as the combustion products mix with secondary combustion air and vent through the top of the stack.

## MEASUREMENT AND DATA ANALYSIS

The following methods were completed as part of the test protocol:

- Method 2A and 2B - vapor volume measurement.
- Method 10 – CO/ CO<sub>2</sub> concentration
- Method 21 – System leak detection
- Method 25B – Hydrocarbon concentration

Transport loading pressure was monitored as described in sub-section 60.503 (d) (i.e., 18" water column gauge test). All sampling procedures conformed to procedures outlined in New Source Performance Standards (NSPS), 40 CFR 60, Subpart XX – Section 60.503 – Test Methods and Procedures and Subpart BBBBBB. Specifically in the field a Dwyer Magnehelic Pressure Gauge was connected to the transport vapor hose connection. Pressure readings were recorded on the truck loading data sheets. All loading bays were tested.

All vapor collection equipment, including fittings, vents and hoses were tested using the Method 21 test. This test is required by 40 CFR 63 Subpart BBBBBB requirements (prior to beginning the test). Any readings equal to or greater than 500 PPM as methane would have been considered a leak and noted and repaired prior to beginning the test. No leaks were observed during the test.

Method 21 leak detection testing was conducted on any gasoline truck whose emissions showed obvious signs of leaks using sight, sound, and smell as an indication. In accordance with Subpart BBBBBB, Section 63.110902(a)(1)(i), any leak equal to or greater than 500 ppm vol. methane was considered a leak. Failed transport truck would have been classified as a failed leak test and loading halted and terminal personnel would have been notified. No transports were found to be leaking during the test.

In addition, any truck that loads a distillate fuel was excluded from the Accountable VOC emission calculations.

USEPA method 25B was used to monitor the exhaust VOC measurements from the VCU. The non-dispersive infrared analyzer (NDIR) was calibrated on propane and the full-scale range is 0 - 1,000-PPM volume. Protocol 1 gases were used to calibrate the analyzer. The exhaust VOC sample was collected through a heated sample line that was automatically regulated to 250° F ± 25°F. This feature prevents any water and soluble VOC condensation in the exhaust sample line. A non-dispersive infrared analyzer, turbine flow meter, inlet vapor thermistor and inlet pressure transducer were connected to the VCU vapor inlet pipe to collect all test data. Inlet VOC flow meter temperature and pressure are used for standardizing volumes during data reduction.

Method 25B was also used to measure inlet VOC concentration. A continuous sample was taken through non-heated Teflon tubing from the turbine meter to the NDIR analyzer. Primary Standard gases were used to calibrate the inlet VOC analyzer. This analyzer operated on a 0-100% volume propane full-scale range.

Both VOC analyzers were calibrated using propane and nitrogen mixtures of approximately 0%, 25%, 50%, and 85% of full scale. A full calibration was performed immediately prior to the start of the test. During the test, hourly drift checks were performed using the 0% and 50% span gas to document acceptable span and zero drift. All pertinent field calibration data was made available for local onsite test observers.

Field data was monitored continuously and recorded every 5 minutes for printout as a test data point. The data is captured in a PLC and exported to a Windows compatible laptop computer running Wonderware software. The data monitored over the test period includes time, ambient temperature, inlet meter temperature, barometric temperature, flow meter static pressure, inlet hydrocarbon concentration, exhaust hydrocarbon concentration, exhaust CO and CO<sub>2</sub> concentrations, and inlet flow rate. All of the accumulated data is downloaded into an Excel spreadsheet to calculate:

- standardized inlet flow rate
- calculated exhaust flow rate
- inlet hydrocarbon mass
- exhaust hydrocarbon mass

At the end of testing, an Excel spreadsheet calculates the total mass of hydrocarbons emitted from the VCU during testing. The volume of accountable liters loaded during the test is then used to calculate the mass of hydrocarbons per liter of gasoline loaded. The inlet and exhaust mass of hydrocarbons is also used to calculate the VCU's destruction efficiency.

Copies of the transport loading rack sheets, hydrocarbon analyzer strip charts, and computer printouts are attached as Appendices to this test report.

## TEST EQUIPMENT

<u>Quantity</u>	<u>Item</u>
2	Thermistor Temperature Probes (turbine meter standardization, ambient)
1	Allen Bradley PLC, Windows compatible Laptop Computer, Wonderware software, Excel software data reduction package
1	Portable LEL Gas Analyzer (Method 21 Leak Testing) RKI Instruments Eagle Portable Gas Detector (0-500 or 0-10,000 PPM)
1	Variable Differential Pressure Transducer (turbine meter standardization) Setra Model: 264
1	Digital Barometer (turbine meter standardization) Setra Model: 270
1	American Meter Co. 8" Turbine Flow Meter (Method 2A Testing)
1	Strip Chart Recorder: Yokogawa DX1000N Six Channel Paperless Recorder
2	VOC Gas Analyzers (Method 25B) Inlet & Outlet: Horiba VIA 510 NDIR
1	CO/CO <sub>2</sub> Gas Analyzer (Method 10 and Method 3A) Horiba VA3000 Gas Analyzer & Horiba VS3000 Gas Sample Conditioner
1	Heated Sample Line (250° F ± 25° F)
1	Stack probe assembly
2	Dwyer Magnehelic Pressure Gauge Model #2030 (40 CFR 60.503 (d) testing)

Gas cylinder documentation is presented in Appendix B.