



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT FIELD OFFICE



DAN WYANT  
DIRECTOR

March 17, 2014

Mr. Rick Morales  
Sunoco Partners Marketing & Terminals, L.P.  
River Rouge Terminal  
500 South Dix Avenue  
Detroit, Michigan 48217

SRN: B2926, Wayne County

Dear Mr. Morales:

**VIOLATION NOTICE**

On March 12, 2014, Ms. Alyssa Laird of Sunoco Partners Marketing & Terminals, L.P. (Sunoco) contacted the Department of Environmental Quality (DEQ), Air Quality Division (AQD), regarding performance testing required at Sunoco's River Rouge Terminal located at 500 South Dix Avenue, Detroit, Michigan. At that time AQD staff evaluated Sunoco'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 administrative rules and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B2926-2013.

During the evaluation, AQD staff identified that Sunoco had yet to fulfill the following testing requirement of EUGASLOADING as listed in MI-ROP-B2926-2013:

Process Description	Rule/Permit Condition Violated	Comments
EUGASLOADING	MI-ROP-B2926-2013, EUGASLOADING, Condition V. 1	Facility failed to verify the VOC emission rate from the vapor collection system within 180 days of permit issuance (testing deadline was January 5, 2014).

Per email communication with Ms. Laird on March 12, 2014, AQD is aware that the facility is planning to conduct testing during May 2014. However, since the facility did not apply for a permit modification to request an extension of the testing deadline prior to January 5, 2014, this permit condition is determined to be in noncompliance until Sunoco conducts the required testing of VOC emission rates from EUGASLOADING, at which time this violation will be considered resolved.

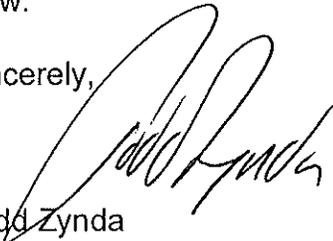
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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 7, 2014 (which coincides with 21 calendar days from the date of this letter). The written response should include: the 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 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.

If Sunoco 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. 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,



Todd Zynda  
Environmental Engineer  
Air Quality Division  
313-456-2761

cc: Ms. LaReeina Wheeler, City of Detroit  
cc via email: Ms. Alyssa Laird, Sunoco  
Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Wilhemina McLemore, DEQ