B4380_FCE_20/607/2

DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

FCE Summary Report

Facility :	Buckeye Termi	nals, LL	3				SRN:	B4380
Location :	6777 BROOKL	YN RD					District :	Jackson
7							County:	JACKSON
City:	IAPOLEON	State:	MI	Zip Code :	49261	Compl Status		Compliance
Source Class: SM OPT OUT Staff: Michael Gabor								
0 0, 1,1,1,2,1,0					FCE Date	Completion :	7/12/2016	
Comments :	:						·	

List of Partial Compliance Evaluations:

Activity Date	Activity Type	Compliance Status	Comments
06/14/2016	Scheduled Inspection	Compliance	Full Compliance Evaluation (FCE) and Inspection (PCE) of Buckeye Terminals (Jackson Operations), a Synthetic Minor / Opt-Out Source.
06/09/2016	Other Non ROP	Compliance	Revised 30 Day Malfunction Report requesting a 30 day extension, which was granted. On May 3, 2016, a seal inspection was conducted on Tank 21 at the facility. During the inspection gaps were found in primary seal and tears were found in the secondary seal. Buckeye is currently working on a repair plan and the tank will be repaired or taken out of service by July 16, 2016. Notification provided per NSPS subpart Kb (60.115(a)(3) MMG
06/02/2016	Other Non ROP	Compliance	30 Day Malfunction Report. On May 3, 2016, a seal inspection was conducted on Tank 21 at the facility. During the inspection gaps were found in primary seal and tears were found in the secondary seal. Buckeye is currently working on a repair plan and the tank will be repaired or taken out of service by June 12, 2016. Will follow-up during upcoming FCE inspection. Notification provided per NSPS subpart Kb (60.115(a)(3)MMG

05/24/2016	MAERS	Compliance	Audit findings were acceptable
05/24/2016	MAERS	Compliance	Audit findings were acceptable. The facility reported a total of 9.32 tons VOC in MAERS and the supporting documentation indicated 1,368 pounds HAPS for 2015, both within permit limits. Emissions from FGIFRTANKS totaled 4.52 tons, which is within the permit limit of 5.6 TPY. Emissions were calculated using AP-42 factors and were supported by supporting documentation. Generally, the reported MAERS emissions and throughputs correlated with supporting documentation. All permitspecified EUs were included in the MAERS report. EUVAPOREXTR continues to be included, even though it is covered by the past-voided PTI 19-95.
·			However, several additional EUs not specifically listed in their PTI were also included in the MAERS report. These EUs (EUTANK17, EUTANK18, EUTANK19, EUTANK20, EUTANK22, EUTANK9, and EU-TK#8) are not grandfathered nor did the report indicate that it qualified for a PTI exemption. I sent the facility an email requesting clarification (attached).
			The Air Compliance contact, Kim Trostel, was not available and is scheduled to return to the office on MAY 31, 2016. I will follow up with her then and / or during the facility's upcoming FCE inspection. These EUs inquestion are most likely exempt or are a part of permitted EUs. Otherwise the reported emissions appear acceptable.
			On May 31, 2016, the Kim Trostel responded to my email and confirmed that the tanks in question are exempt under Rule 284(i). I requested that they mark these tanks as such during the next MAERS cycle. Their email has been added to their file. As apart of the FCE, I also requested that they report emission from Tank 10 and EUTANK5 (knock out tank, not in operation during 2015/2015, per FCE) as well during the next cycle.

02/12/2016	MACT (Part 63)	Compliance	Subpart BBBBBB. No delegation authority to enforce; assumed to be acceptable as submitted.
08/17/2015	MACT (Part 63)	Compliance	40 CFR Part 63 Subpart BBBBBB. No delegation authority to enforce; assumed to be acceptable as submitted.

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