

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Buckeye Terminals, LLC	SRN : B4380
Location : 6777 BROOKLYN RD	District : Jackson
	County : JACKSON
City : NAPOLEON State: MI Zip Code : 49261	Compliance Status : Compliance
Source Class : SM OPT OUT	Staff : Stephanie Weems
FCE Begin Date : 6/15/2016	FCE Completion Date : 7/15/2020
Comments : FCE compliance inspection for FY20.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
07/15/2020	Scheduled Inspection	Compliance	Onsite PCE inspection as part of FY20 FCE.
06/17/2020	Other		Sent email to schedule on-site inspection for July 15, 2020. Requested confirmation of facility's ability to accommodate the inspection and required PPE. Inspection is announced due to COVID19 epidemic and need for increased caution when interacting with others. Inspection date confirmed.
05/26/2020	Records Review (In office)	Compliance	Review of records that company is required to keep in accordance with PTI 437-93C. This is being handled separately from the onsite inspection due to the COVID-19 pandemic.
03/24/2020	MAERS	Compliance	2019 MAERS submitted. As with previous years, facility did not add control efficiency for the VRU. This makes the AQD calculated total for VOC much higher than the reported value. Additional information attached for emission calculations.
01/31/2020	MACT (Part 63)	Compliance	Subpart BBBBBB - Reports compliance for all tanks. No vapor tightness testing documentation issues reported. No equipment leaks reported. No excess emissions reported. No malfunctions reported.

Activity Date	Activity Type	Compliance Status	Comments
08/05/2019	MACT (Part 63)	Compliance	Subpart BBBBBB - No loading rack issues reported. No equipment leaks not repaired within 15 days after detection. No excess emissions reported. No malfunctions reported.
04/30/2019	MAERS	Compliance	Audit complete. As with previous years, facility did not add VRU efficiency value of 99.99%. This makes AQD calculated totals much higher than source reported total for VOC. Increase in VOC emissions correlates with the addition of tank standing loss.
02/08/2019	MACT (Part 63)	Compliance	Subpart BBBBBB. No problems with loading racks or equipment leaks. No excess emissions or exceedances reported. Report acceptable.
08/21/2018	MACT (Part 63)	Compliance	Subpart BBBBBB. No problems with loading rack or equipment leaks.
04/23/2018	MAERS	Compliance	AQD calculated VOC emissions drastically higher as no control factor for VRU unit. Added control factor. No changes from previous year except minor decrease in VOC emission due to decrease in gasoline throughput. Only 8 tons of VOC's reported. No compliance concerns.
02/12/2018	MACT (Part 63)	Compliance	Subpart BBBBBB-bulk gasoline. Met 10 mg/l emission limit. No leaks requiring fixes reported.
01/02/2018	MACT (Part 63)	Compliance	Change in Information Notification, Subpart BBBBBB. Now using CEMSO to measure organic compound concentration to show compliance with emission limit.
09/18/2017	MACT (Part 63)	Compliance	Subpart BBBBBB. Note that a portable vapor recovery unit. was operated between January 1, 2017 through April 12, 2017 while permanent unit was being repaired. (PTI was modified to allow use of portable vapor recovery unit on a regular basis as needed.)

Activity Date	Activity Type	Compliance Status	Comments
05/09/2017	MAERS	Compliance	Added VRU control factor as AQD emissions calculations were erroneously high. (Added 99.9% efficiency although efficiency from stack test is expressed in 0.1 mg per liter of gasoline throughput.) This did not change Company submitted emission calculations as they submitted detailed 89 page summary how emissions were calculated. Some decrease in VOC emissions due to decrease in throughput from previous year. No other changes.
03/08/2017	Meeting Notes	Compliance	Permit application meeting. PTI 437-93C. A brief tour/inspection followed the meeting. There are compliance issues associated with the permit application.
02/08/2017	MACT (Part 63)	Compliance	Subpart BBBBBB No emission deviation. CMS downtown 1.3% (Quality assurance calibration over 48 hour period.)
08/10/2016	MACT (Part 63)	Compliance	Subpart, BBBBBB, including Excess Emission and CEMS performance reports.
07/29/2016	MACT (Part 63)	Compliance	Corrected Notification, per 40 CFR 63.9(j). Correction for a Notice of Compliance Status (NOCS) submitted January 4, 2011.
07/12/2016	MACT (Part 63)	Compliance	Change in Information Notification per 40 CFR 63.9(j)
06/28/2016	Other Non ROP	Compliance	Seal repairs update, Tank 21. Complete. Report attached to the file. Emission limits were not exceeded.

Name: Stan W

Date: 9-11-2020

Supervisor: [Signature]