

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B438034980

FACILITY: Buckeye Terminals, LLC		SRN / ID: B4380
LOCATION: 6777 BROOKLYN RD, NAPOLEON		DISTRICT: Jackson
CITY: NAPOLEON		COUNTY: JACKSON
CONTACT: Kimberly Trostel, Sr Specialist Air Compliance		ACTIVITY DATE: 06/14/2016
STAFF: Michael Gabor	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Full Compliance Evaluation (FCE) and Inspection (PCE) of Buckeye Terminals (Jackson Operations), a Synthetic Minor / Opt-Out Source.		
RESOLVED COMPLAINTS:		

Synthetic Minor / Opt-Out Source. Full Compliance Evaluation (FCE) and Inspection (PCE) of Buckeye Terminals, Jackson Operations, located at 6777 Brooklyn Road, Napoleon, Michigan 49261.

State Registration Number (SRN): B4380

Facility Contacts

Kimberly Trostel (KT), Senior Specialist, Air Compliance, (419) 993-8003, KTrostel@buckeye.com

Lee Ann Beck (LB), HSSE Compliance, (216) 271-8203, LBeck@buckeye.com

Jordan Wahl (JW), Terminal Operator, (517) 536-8627, jwahl@buckeye.com

Ed Barbour (EB), Terminal Operator, (517) 536-8627, ebarbour@buckeye.com

Purpose

On June 14, 2016, Scott Miller (SM), Jackson District Office Supervisor, and I conducted a scheduled, announced inspection of the Buckeye Terminals' (BT) facility located in Napoleon, Michigan (Jackson County) at 6777 Brooklyn Road. The purpose of the inspection was to determine the facility's compliance status with applicable federal and state air pollution regulations, particularly with the Michigan Natural Resources and Environmental Protection Act 451 of 1994, Part 55, Air Pollution Control and the administrative rules, and the conditions of BT's Air Use Permit to Install (PTI) number 437-93B, issued November 10, 2005. This facility was last inspected on June 28, 2016.

Facility Location

The facility is located in Napoleon Township. It is immediately surrounded by commercial and industrial operations and agricultural fields.

Regulatory Applicability

The facility is a Synthetic Minor / Opt-Out Source for volatile organic compounds (VOC) and hazardous air pollutant (HAP) emissions. BT accepted VOC and HAP emission limits in order to remain below major source emission thresholds. The facility is regulated by PTI 437-93B.

BT is also subject to

- Title 40 of the Code of Federal Regulations (CFR), Part 63, Subpart BBBBBB, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities,
- Title 40 of CFR, Part 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals,
- Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 (only EUTANK7 is subject), and
- Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (only EUTANK21 is subject).

A compliance determination was not made regarding the NESHAP subpart BBBBBB standard. The facility confirmed verbal compliance with this respective NESHAP standard. BT also operates under a PTI exemption found under Michigan Air Pollution Control Rule R 336.1284i (Rule 284i). Exempt emission units that BT operates are also indicated below in the *Emission Unit (EU) / Flexible Group (FG) Details* section. The facility also reports its emissions to the Michigan Air Emissions Reporting System (MAERS) and is designated as a Fee Category II source.

Emission Unit (EU) / Flexible Group (FG) Details

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description	Stored Contents
EUVRU	Loading rack and associated control device.	N/A
EUTANK1	1.5 million gallon external floating roof storage tank, installed in 1953. The tank was retrofitted with a snow cover, converting it to an internal floating roof tank.	Regular Gasoline
EUTANK2	840,000 gallon external floating roof storage tank, installed in 1953. The tank was retrofitted with a snow cover, converting it to an internal floating roof tank.	Premium Gasoline
EUTANK3	1.5 million gallon vertical fixed roof tank, installed in 1953.	#2 Diesel
EUTANK4	1.8 million gallon vertical fixed roof tank, installed in 1953.	#2 Diesel
EUTANK5	100,000 gallon vertical fixed roof tank, installed in 1953.	Knock Out Tank / Not in use to store fuels.
EUTANK6	420,000 gallon vertical fixed roof tank, installed in 1967.	#1 Diesel
EUTANK7	840,000 gallon internal floating roof tank, installed in 1979.	Regular Gasoline
EUTANK21	420,000 gallon internal floating roof tank for gasoline, ethanol, or distillate.	Ethanol

Changes to the equipment described in this table are subject to the requirements of R336.1201, except as allowed by R336.1278 to R336.1290.

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Emission Units Included in Flexible Group	Stack Identification
FGIFRTANKS	EUTANK1, EUTANK2, EUTANK7, EUTANK21	NA
FGFIXEDROOFTANKS	EUTANK3, EUTANK4, EUTANK5, EUTANK6	NA
FGFACILITY	All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment and exempt equipment.	NA

RULE 284i EXEMPT EMISSION UNIT SUMMARY TABLE

EU (Storage Tank)	Capacity (gallons)	Stored Contents
Tank 8	4,000	Gasoline Additive
Tank 9	4,000	Gasoline Additive
Tank 17	2,000	Gasoline Additive
Tank 18	6,000	Gasoline Additive
Tank 19	350	Gasoline Additive
Tank 20	4,000	Gasoline Additive
Tank 22	350	Gasoline Additive
Tank 10	2,000	Slop (Fuel tanker truck generated from purging tank before taking delivery)
Tank 14	12,600	Water

Arrival & Facility Contacts

Visible emissions or odors were not observed upon our approach to the facility via Brooklyn Road. We arrived at 12:00 pm, and were directed by EB to proceed to the facility's office. Note, the facility is gated and is an automated 24/7 operations, but is generally only staffed during normal business hours.

Facility Background

BT operates a bulk gasoline terminal that receives various fuels, such as regular and premium gasoline, #2 diesel, and #1 diesel (kerosene) via a pipeline directly from a refinery. Denatured ethanol and other fuel additives (distillates) are delivered to the site by tanker trucks and are stored onsite, in either internal floating roof tanks or fixed roof tanks. Fuel additives are only stored in the Rule 284(i) exempt fixed roof tanks and its contents have true vapor pressures less than 1.5 psia or less.

All stored fuels are dispensed and loaded into tanker trucks via a loading rack in either one of the two covered bays, and are delivered to local gas stations, etc. As the fuel is dispensed, certain, brand-specific additives are blended according to customer specifications. Mid-grade gasoline is formulated by blending equal amounts of regular and premium grades of gasoline.

VOC emissions generated by fuel loading are controlled by the vapor recovery unit (VRU / EUVRU). The facility provided handouts depicting the VRU's operation (attached). In summary, as the fuels are loaded using the loading racks, a vacuum captures and draws VOC emissions to one of the two carbon beds (i.e. carbon absorption system). During the carbon bed's regeneration cycle, the VOC emissions are liberated and are recirculated to a storage tank. The VRU also has a stack for any de minimums VOC emissions not recirculated to a storage tank. According to the facility, the carbon beds last for about ten years, and both were replaced last year.

Typically, one or two operators are onsite (JW / EB) during business hours and must be able to respond to the facility quickly in-case of an emergency, etc., during on-call status. BT is a 24/7, automated facility, as tanker truck drivers can pick up / drop off products using keycard access. A keycard is granted by BT after each driver completes specified training and demonstrates proper certification, as specified by their PTI. BT's internal computer / automated system takes monthly throughputs and calculates monthly emissions.

The BT 2015 Michigan Air Emissions Reporting System (MAERS) reported the following facility-wide emissions using AP-42 emission factors (EF):

- 9.32 tons VOC, facility wide (facility wide emission limit: 82 tons per year (tpy)).
- 4.52 tons VOC, FGIFRTANKS only (emission limit: 5.6 tpy).
- 1,368 pounds HAPS (facility wide emission limit: less than 9 tpy).

Pre-Inspection Meeting

We conducted a pre-inspection meeting with KT, LB, JW, and EB. I provided a copy of and reviewed the Michigan Department of Environmental Quality (MDEQ) brochure entitled *Rights and Responsibilities Environmental Regulatory Inspections*. I also invited BT to complete the customer service survey upon receipt of my inspection report. I informed the facility's staff of my intent to conduct a facility inspection and to review the various records required by their permit.

The pre-inspection began with a background summary of BT, which was collectively provided by BT staff. The summary included various operational characteristics, descriptions of the stored produces, etc. as summarized above.

I asked whether BT experienced any other recent issues besides their recent issue with EUTANK21. BT stated that no other issues were identified and so we discussed EUTANK21. On May 27, 2016, I received a 30 Day Malfunction Report that indicated that on May 3, 2016, a seal inspection was conducted on Tank 21 (EUTANK21). During the inspection, gaps were found in primary seal and tears were found in the secondary seal. BT originally planned to repair the tank or take it out of service by June 12, 2016. The notification was initially provided per NSPS subpart Kb (60.115b(a)(3)). On June 7, 2016, BT's contractors attempted to make the necessary repairs but due to safety concerns could not access the tanks. Prior to the inspection, on June 9, 2016, I received BT's amended 30 Day Malfunction Report and requested a 30 day extension to the 45 days granted by NSPS Subpart Kb 60.113b(a)(2) to make repairs to EUTANK21. I granted a verbal approval during the inspection but requested that they amend their initial 30 Day Malfunction Report. I also provided a written approval via email (attached) after the inspection on June 14, 2016. Repairs must be made by July 16, 2016 or tank 21 must be taken out of service if repairs can't be made by this date. This is the only tank that stores ethanol and if it can't be repaired, the entire terminal would

shut down as blended gasoline requires a certain amount of ethanol in order to be sold or an alternative means to store ethanol onsite would be required.

KT also asked before (see attached email dated June 8, 2016) and during the inspection whether VOC emissions associated with tank cleanings or roof landings (occurs when the internal floating roof does not float on the liquid product but is suspended by internal supports when the internal volume reaches a certain volume) are to be included when calculating compliance with BT's FGIFRTANKS 5.6 tpy VOC emissions limit, per SC 2.1a. KT is concerned that the additional VOC emissions to be generated from the pending EUTANK21 repair may come close to or may surpass the 5.6 tpy emissions limit. I confirmed that the current permit language does not exempt tank cleanings or tank landings, but requires that all VOC emissions associated with operation of this tank be included. This is consistent with an internal email discussion with Air Quality Division (AQD) permit engineers conducted prior to the meeting (see attached emails dated June 8, 2016 through June 13, 2016). I did agree to confirm with additional field staff prior to making a final determination.

On June 15, 2016, I searched other BT facility permits having the most similar conditions and operations to the Jackson operation and identified BT's Marshall Operation (SRN B9052). I contacted the facility's inspector, Rex Lane, and he agreed with my determination that all emissions associated with EUTANK21's operation are to be included when determining compliance with the 5.6 tpy VOC emissions limit. The PTI would need to specifically exclude certain process emission (e.g. from tank cleanings or roof landings). See the attached email dated June 15, 2016. On June 15, 2016, I emailed KT (attached), and informed her that all VOC emissions associated with EUTANK21's operation, including tank cleanings and landings, are to be included when determining compliance with the 5.6 tpy VOC emissions limit. I also requested that once all repairs have been made, to provide me with an update, including compliance status with the 5.6 tpy VOC emission limit. I also recommended that they submit a PTI modification application to re-evaluate the 5.6 tpy VOC emission limit, as they seem to operate near it.

Together with the facility staff, we reviewed the Special Conditions (SCs) of PTI 437-93B. I also requested the records indicated below, under the *Recordkeeping Review* section, for May 2015 through April 2016. Records were provided by KT on June 15, 2016 (attached). Specific points of discussion are documented under this section or under the *Onsite Inspection Narrative* section.

EUVRU

We first reviewed the SCs for EUVRU. The 10 mg / liter of gasoline VOC emission limit, SC 1.1c, was verified during an October 6, 2010 stack test that measured 0.10 mg / liter of gasoline loaded.

We then discussed the process/operation limits SCs 1.3 through 1.5. SC 1.3 requires that the facility not load any delivery vessel with an organic compound having a true vapor pressure greater than 1.5 psia or any delivery vessel that carried, as its previous load, an organic compound having a true vapor pressure greater than 1.5 psia unless all provisions of Rule 706 are met. It appears that the facility is in compliance with the requirements of Rule 706.

We then discussed the SC 1.3's sub-requirements a) through h), which parallel the

provisions of Rule 706. KL confirmed that the delivery vessel is filled by a submerged fill pipe, per SC 1.3.a., and that the tanker trucks are bottom loaded. Per SC 1.3.b, the delivery vessel is controlled by a vapor recovery system that captures all displaced organic vapor and air by means of a vapor tight collection line. BT operators stated that the tanker truck drivers are trained to connect the Scully cord, which provides overfill protection. In addition, the vapor recovery hose must be hooked up prior to any liquid movement. Violators are locked out and may no longer gain access to the facility. Per SC 1.3.c., BT training of truck drivers (see that attached certification forms truck drivers must sign after being trained) and an automated computer system ensures that the vapor tight collection line is connected before any organic compounds can be loaded. BT operators confirmed that they use dry break couplers to prevent product leakage per SCs 1.3.d. and 1.3.e. In addition, the facility conducts a daily LDAR check that also relies on sight, smell, and hearing (see the attached daily inspection checklist). BT relies on US EPA Test Method 27 truck certifications to ensure that the delivery vessels are equipped with pressure-vacuum relief valves that are vapor tight and set to prevent the emission of displaced organic vapor during the loading of the delivery vessel, except under emergency conditions, per SC 1.3.f. and that they are also equipped with hatch openings that are kept closed and vapor tight during the loading of the delivery vessel, per SC 1.3.g. Each tanker truck is Method 27 certified annually and BT receives each certification via fax and files each one onsite. BT's internal computer system keeps track of Method 27 certification and will block access to truckers not have such certification. I observed examples of Method 27 certification forms filed onsite and examples are attached. BT operators confirmed the presence of posted written procedures for the operation of all control measures required by Rule 706, per SC 1.3.h. I also observed this signage posted near the loading device during the onsite portion of the inspection.

We then discussed SC 1.4, and its requirement to comply Rule 627. BT appears to be in compliance with this SC, based on previous discussion regarding Method 27 and operation of its VRU, as documented above.

Next, we discussed SC 1.5, which requires compliance with NSPS subparts A and XX, as they apply to EUVRU. BT appears to be in compliance with SC 1.5. KT described the EUVRU's vapor collection system, which is designed to collect the total organic compound vapors displaced from tank trucks during product loading, per SC 1.5.a. The entire system is a closed loop that allows emissions to remain in the system and the emissions are returned to the main storage tank. If the collection system is not operating, tanker trucks cannot load. Next, we discussed SC 1.5.b., and KT confirmed that the facility installed check valves, which only allows flow in one direction, on the vapor collection system that are designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack. BT staff confirmed that the loadings of liquid product into gasoline tank trucks occurs only in vapor-tight gasoline tank trucks using the procedures found in 40 CFR 60.502(e), per SC 1.5.c. As previously described above, BT only allows tanker trucks that have been certified under Method 27 to load / unload the various organic liquids. BT staff confirmed that the only compatible tanker trucks equipped with compatible equipped may successfully connect with BT's vapor collection system, per SC 1.5.d. BT staff also confirmed that their computer system will assure that the vapor collection system is connected during each loading of a gasoline tank truck and that new drivers are trained and are watched as they go through the hookup procedures, per SC 1.5.e. I also observed posted signs with an outline of the hookup procedures, per SC 1.5.e. KT

confirmed that the vapor collection and liquid loading equipment will not operate if the gauge pressure in the delivery tank exceeds 4,500 Pascals (450 mm of water) during product loading, per SC 1.5.f., and is meant to prevent tanker truck blowout. In addition, no pressure-vacuum vent in the vapor collection system will begin to open at a system pressure less than 4,500 pascals (450 mm of water), per SC 1.5.g. Next, I observed and discussed BT's monthly inspection of the vapor collection system, the vapor processing system, and each loading rack handling gasoline for total organic compound liquids or vapor leaks, per SC 1.5.h. I observed their associated records and no leaks were identified in the last year, except for a leak identified in May 2015 due to a pump, and was resolved. See the previously discussed daily checklist. In addition, the facility provided a scope of work dated August 11, 2015 to document the last major maintenance activities that occurred in the last 12 months, attached.

The facility has a CEMS system installed, per SC 1.6, but it is not compatible with the internal computer system used to calculate emissions, so they are using an alternative monitoring method based on LDAR results, AP42, and October 2010-derived EFs to calculate emissions.

Recordkeeping items required by SCs 1.8 and 1.9 were provided on June 15, 2016 and were reviewed. My findings are documented below under the *Recordkeeping Review* section. BT appears to be in compliance with SC 1.10.a., as I observed Method 27 documentation (examples attached), with SC 1.10.b., as I observed internal documentation of previously completed preventative maintenance activities, which are done every six months on the VRU and the loading rack (Last VRU Retrofit (Maintenance) Project Scope of Work attached), and with SC 1.10.c., with all VRU malfunctions tracked by a database that I observed. BT also appears to be in compliance with SC 1.11, based on the NSPS subpart XX documentation I observed.

FGIFRTANKS

We then discussed permit SCs specific to FGIFRTANKS. The facility staff confirmed that EUTANKS 1, 2, 7, and 21 meet the requirements of Rule 604, per SCs 2.2 and 2.3. BT complies with Rule 604(1) by meeting subpart (b), the tanks are equipped with an internal floating roof. BT also appears to be in compliance with the requirements of the NSPS subparts A and Ka, as they apply to EUTANK7, per SC 2.4. I confirmed that NSPS subpart Ka 60.112a(a)(2) requirements apply, as EUTANK7 is a fixed roof with an internal floating tank type cover. Because of this, Ka doesn't require an annual or 10-year seal inspection. However, KT did inform me that EUTANK7 is subject to NESHAP subpart BBBBBB, which requires annual inspections and a 10-year inspection to be completed by 2018. Its last annual inspection was conducted on July 7, 2015. The inspection records I observed during the inspection also suggest compliance with SCs 2.7 and 2.10.

BT appears to be in compliance with SC 2.5, which requires that EUTANK21 comply with the requirements of NSPS subparts A and Kb. Kb requires an annual inspection, per Kb 60.113b(a)(2), through the hatch to assess the integrity of the internal seals and a 10-year inspection, per Kb 60.113b(a)(4), which can be done while in service and walking on the floating roof. The last annual inspection was done on July 7, 2015 and it is currently in the process of conducting its 10 year inspection, as documented above. The inspection records I observed during the inspection also suggest compliance with SCs 2.7 and 2.10.

KT confirmed that the tanks are equipped per SC 2.6. KT then showed me their internal database used to track records required by SCs 2.8 and 2.9, and I requested copies to be emailed to me. The records were provided on June 15, 2016 and were reviewed. My findings are documented below under the *Recordkeeping Review* section.

FGFIXEDROOFTANKS

We then discussed the SCs related to FGFIXEDROOFTANKS. KT confirmed that these tanks are not used to store any organic compounds having true vapor pressure of more than 1.5 psia, per SC 3.1 and are equipped with conservation vents, per SC 3.2. These two requirements are also followed for safety in order to prevent any potential tank explosions, etc. KT then showed me their internal database used to track records required by SCs 3.3 and 3.4, and I requested copies to be emailed to me. The records were provided on June 15, 2016 and were reviewed. My findings are documented below under the *Recordkeeping Review* section.

Onsite Inspection Narrative

BT staff escorted SM and I for the onsite tour portion of the inspection. We were first shown the pumps that supply the truck loading tracks / EUVRU. Then we observed the tank farm, beginning with EUTANK6 and then we viewed the remaining tanks, both permitted and exempt. I observed black staining on EUTANK21, used to store ethanol, and was told that it was due to ethanol's sugar condensing on the exterior of the tank.

We then observed the VRU and its stack, which appeared to meet the dimensions requirements of SC 1.12a. We also observed the EUVRU monitoring equipment and daily checklist used to meet the monitoring requirements of NESHAP subpart BBBB.

I was also shown the previously permitted EUVAPOREXTR, which continues to operate and inject air to purge the remediation well. However, vapors are no longer burned, so PTI 19-95 was previously voided.

When observing the exempt tanks, I observed some minimal buildup of additive sludge within the containment area. I was told by BT staff that the sludge buildup is cleaned / reclaimed every so often. We then observed the slop tank, which is used by tanker trucks to deposit their off-spec products prior to taking a load. The slop tank contents are sent offsite to a company that reclaims organic solvents, etc. from the mixture.

We then observed the truck loading rack, with 2 bays and additional Rule 201 exempt storage tanks. We also observed all signage required by the permit, as previously indicated above. The loading rack is controlled by a computer system that ensures appropriate safety and compliance with permit requirements, as previously indicated above. The system also controls the addition and mixing of ethanol and the various gasoline additives, as determined by the fuel brand. We did not observe the truck loading rack while in operation.

Facility Wide Observations

During the facility tour, we did not observe any odors or leaks. Overall, the tanks appeared to be in good condition, with minimal or no exterior rust observed on the tank exterior.

Overall, BT appears to be practicing excellent facility housekeeping, as I did not observe any uncontained spills, leaks, odors, etc. from any of the storage tanks and associated piping.

Post-Inspection Meeting

We returned to BT's conference room and held a brief post-inspection meeting. I informed facility staff that I did not have any immediate compliance concerns and that I would make a final determination upon review of the requested recordkeeping items. We thanked the staff for their excellent cooperation and assistance, and departed the facility at approximately 3:10 pm.

Recordkeeping Review

Below is a summary of the requested records, as specified by the following permit SCs or records requested to demonstrate compliance with a specific SC for the period of for May 2015 through April 2016. Some recordkeeping items were received during the inspection, as indicated below. All provided records are attached to this report. Records were provided timely, on June 15, 2016. On June 16, 2016, KT responded to my email request to indicate which records should be used to determinate compliance with specific SCs (attached).

EU or FG Designation	Record Request per Permit SC(s) for May 2015 through April 2016 OR otherwise noted.	Comments (if applicable)	Substantial Compliance (Yes or No) / Comments
	1.8	Requested to also demonstrate compliance with SC 1.2, material usage limits of 25 million gallons per month and 300 million gallons per year, based upon a 12-month rolling time period, of organic	Yes / Highest monthly throughput of organic compounds was 11,614,281 gallons during July 2015. / Highest 12-month rolling throughput of organic compounds was 125,353,909 gallons during July 2015. / All product (diesel fuel) loaded less than 1.5 psia can be found on the emissions summary document page 2 of 40. BT reported that in

EUVRU		compounds.	starting midday on April 15, 2015 through April 21, 2015, they loaded diesel without a control. The total diesel loaded during this timeframe was 215,097 gallons.
	1.9	Requested to also demonstrate compliance with SC 1.1b, VOC emission limit of 1.05 tons per month. Note: All truck loading rack emissions are through the VRU.	Yes / 0.37 tons, highest monthly VOC emissions reported for July 2015. / 3.93 tons, highest 12-month rolling VOC emissions reported for July 2015.
	1.10 a. through c.		Yes / See discussion above under the <i>Pre-Inspection Meeting</i> section. Records observed during the inspection and samples are attached to the report.
	1.11		Yes / Based upon the NSPS subpart XX documentation I observed during the inspection.
	2.8		Yes
		Requested to	

FGIFRTANKS	2.9	also demonstrate compliance with SC 2.1a, VOC emission limit of 5.6 tons per year (tpy), based on a 12-month rolling time period.	Yes / 4.12 tons, highest 12-month rolling VOC emissions reported for December 2015.
	2.10		Yes / See discussion above under the <i>Pre-Inspection Meeting</i> section. Records observed during the inspection.
FGFIXEDROOFTANKS	3.3		Yes
	3.4		Yes
FGFACILITY	4.2	Requested to also demonstrate compliance with SC 4.1a, VOC emission limit of 82 tpy, based on a 12-month rolling time period.	Yes / 8.78 tons, highest 12-month rolling VOC emissions reported for April and December 2015.
	4.3	Requested to also demonstrate compliance with SC 4.1b, total HAPs emission limit of less than 9 tpy, based on a 12-month rolling time period.	Yes / 0.6581 tons HAPs reported for December 2015 and February 2016.
Rule 284i Exempt Tanks			Yes / Contents less than 1.5 psia, stored in vessels with a capacity of less

			<p>than 40,000 gallons, and volatile organic count liquids are stored.</p>
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Compliance Summary

Based upon the visual observations and the review of the records, BT appears to be in substantial compliance with the requirements of their PTI. As indicated above, the facility's FGIFRTANKS VOC emissions (4.12, highest 12-month rolling VOC emissions reported for December 2015) are approaching the 5.6 tpy VOC emission limit, and the facility may further approach this limit pending the seal repair to EUTANK21. Per NSPS subpart Kb, repairs must be made by July 16, 2016 or must be taken out of service if repairs can't be made by this date. Their options include remaining below the 5.6 tpy limit or to submit a PTI modification application to request a raise in the FGIFRTANKS emission limit. Once the repairs are made to EUTANK21, I requested that they provide me with an update and include repair documentation and revised emissions data to indicate compliance status with the 5.6 tpy limit.

Per the next MAERS reporting cycle, I requested that KT indicate that their exempt tanks are exempt under Rule 284(i), and that they report emissions for Tank 10 (exempt tank with minimal emissions) and EUTANK5 (not in operation during 2015/2016, used as a vapor knockout tank).

NAME Michael M. Harty DATE 7/12/16 SUPERVISOR [Signature]