

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection**

B664625797

FACILITY: Sunoco Pipeline L.P. - Marysville Pump Station	SRN / ID: B6646
LOCATION: 250 MURPHY DR, MARYSVILLE	DISTRICT: Southeast Michigan
CITY: MARYSVILLE	COUNTY: SAINT CLAIR
CONTACT: David Bonamy , Operations Supervisor	ACTIVITY DATE: 04/23/2014
STAFF: Usama Amer	COMPLIANCE STATUS: Compliance
SUBJECT: Inspection of an Opt-out Source Investigate the malfunction incident of Storage Tank #43	SOURCE CLASS: SM OPT OUT
RESOLVED COMPLAINTS:	

On April 23, 2014, I conducted a Self-Initiated Inspection at Sunoco Pipeline L.P.– Marysville Pump Station (Sunoco), located at 250 Murphy Dr., Marysville, St. Clair County. The purpose of the inspection was to determine Sunoco's compliance with the requirements of Article II, Air Pollution Control, Part 55 of Act 451 of 1994, the administrative rules, and the conditions of the Opt-Out Permit (PTI) #178-98B, and to investigate the malfunction incident of Storage Tank #43, as reported by Sunoco on April 4 (by phone) and 10 (in writing), 2014. Mr. David Bonamy, Operations Supervisor, and Jennifer Roberts, Environmental Specialist, represented Sunoco during the inspection.

Malfunction Incident of Storage Tank #43

Sunoco submitted a letter (available in source's file), dated April 10, 2014, to the AQD describing the Incident –

"This letter is a follow up to a verbal notice that was called into MDEQ Air Quality Office on Friday, April 4, 2014, at 3:00 p.m. On Thursday, April 3, 2014, Sunoco Pipeline, LP (SPL) discovered that crude oil was accumulating on the internal floating roof in tank #43. By Friday, April 4, 2014, it appeared the roof had sunk to low legs and approximately 90,000 barrels of crude oil was on top of the roof.

The following is a chronology of what has occurred:

- SPL identified product on the roof in Tank 43 on April 3, 2014.
- By the morning of April 4, 2014, the roof was assumed to be on low legs.
- By 2:00 p.m. on Friday, April 4, 2014, the tank was being pumped down at full rate.
- At 3:00 p.m. on Friday, April 4, 2014, Jennifer Roberts called MDEQ Air Quality Division and filed a report.
- By 10:00 a.m. on Saturday, April 5, 2014, the tank level had been pumped down to 4' 1 ¾" (approximately 12,936 bbls). The tank shell was closed and the tank was isolated from future product movements.

The exact cause is undetermined at this time; however it is actively being investigated. The tank will go through a full API 653 inspection as soon as the tank can be safely emptied without further damaging the internal floating roof. SPL tank engineers are currently working to develop a plan to empty and inspect the tank.

The only source involved with this incident was storage tank #43. To minimize emissions, the tank will be emptied as soon as possible. This incident was not a normal occurrence, and was unavoidable."

BACKGROUND

PTI #178-98B is an Opt-out permit, which covers the crude oil storage tanks #34, #36, #41, #43, #44, #45 & #46. Sunoco keeps records of monthly throughput of the crude oil for all the tanks. The amount of throughput is the same as the amount shipped off site.

Tanks #44, #45, and #46 are subject to the provisions of NSPS 40 CFR 60 Subpart A & Kb.

Tanks #34, #36, #41, and #43 are subject to the provisions of Rule 604. However, Tank #36 was removed offsite in May, 2011.

COMPLIANCE STATUS

FGTANKFARM

* S.C. #1.1.a and #1.7 - stipulate that the annual crude oil throughput not to exceed 194,565,000 barrels, based on a 12-month rolling time period as determined at the end of each calendar month, and all records to be kept on file, respectively.

- Attachment B shows the highest total crude oil throughput was 53,482,699 barrels for the month of December, 2013, based on a 12-month rolling period.

* S.C. #1.2, #1.5 & #1.8 - stipulate that all provisions of the Federal Standards of NSPS as specified in 40 CFR Part 60 Subparts A and Kb (including monitoring), as they apply to tanks #44, #45, and #46 for being constructed/modified after 7/23/84, shall be complied with.

- Attachment A shows examples of check lists for complying with the monitoring and recordkeeping requirements.

* S.C. #1.3 - stipulates that tanks #34, #41, and #43 shall not operate unless all provisions of Rule 604 are met.

- Attachments A & C show examples of check lists for complying with the monitoring and recordkeeping requirements.

* S.C. #1.6 - stipulates that the all required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month, for the previous calendar month.

- USEPA Tank Program is used to calculate the VOC/HAP emissions. A copy of USEPA Publication #1673 (5/98) showing Compilation of Air Emission Factors For Petroleum Distribution and Retail Marketing Facilities, which are used in the above calculations, is available in source's file.

FGFACILITY

* S.C. #2.1a - stipulates the VOC annual emission rate not to exceed 90 tpy, based on a 12-month rolling period.

- Attachment D shows that the VOC annual emission rate was 13 tpy for December, 2013, based on a 12-month rolling period.

* S.C. #2.1b & #2.1c - stipulate the Individual and Total HAPs annual emission rates not to exceed 9 tpy, or 22.5 tpy, respectively, based on a 12-month rolling period.

- Attachment D shows that the highest Individual (Xylene), and Total HAPs rates were 0.118 tpy, and 0.501 tpy for 2013, respectively, based on a 12-month rolling period.

* S.C. #2.2 - stipulates that all required semi-annual calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the last day of the calendar month following the end of the semi-annual time period.

* S.C. #2.3 - stipulates that records of semi-annual VOC, individual HAP and total HAP emission rate calculations for FGFACILITY, as required by SC 2.1a, SC 2.1b and SC 2.1c shall be kept on file for a period of at least five years and made available to the Department upon request.

- Attachment D shows an example of calculation tables of VOC and HAPs emission rates in compliance with above 2 conditions #2.2 & #2.3.

CONCLUSION

Sunoco appeared to operate in compliance with the Air Quality Regulations and the conditions of the Opt-Out Permit (PTI) #178-98B.

NAME

Sam Amer

DATE

7/3/14

SUPERVISOR

Joyce

