

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

B664628374

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: Ron O'Toole , Senior Manager of Environmental Compliance		ACTIVITY DATE: 01/23/2015
STAFF: Erik Gurshaw	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Self-Initiated Inspection		
RESOLVED COMPLAINTS:		

SRN: B6646

COMPANY: Sunoco Pipeline, LP

COMPANY ADDRESS: 250 Murphy Drive; Marysville, MI 48079

PURPOSE OF INSPECTION: Self-Initiated

CONTACT PERSON: Mr. Ron O'Toole, Senior Manager of Environmental Compliance (Ph: 412-784-3472; Cell: 412-760-3520; Email: rjotoole@sunocologistics.com)

COMPANY PHONE NUMBER: 810-364-6251

**INTRODUCTION**

On January 23, 2015, AQD staff, Erik Gurshaw, conducted an unannounced, self-initiated inspection at Sunoco Pipeline, L.P. located at 250 Murphy Drive in Marysville, Michigan. The purpose of the inspection was to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) Rules; and the conditions of Permit-To-Install (PTI) Number 178-98B for 7 crude oil storage tanks (FGTANKFARM). The company's PTI also sets 12-month rolling VOC, individual HAP, and aggregate HAP emission limits for the facility. The inspection was also conducted to determine if measures taken by the company in response to an October 7, 2015, Violation Notice (VN) were effective in abating odors attributed to the facility's operations.

Prior to arriving at Sunoco Pipeline, LP-Marysville, AQD staff conducted odor observations southward from the intersection of Gratiot and Murphy Drive to where Murphy Drive dead ends from 10:15 AM until 10:30 AM without detecting any odors. The wind was blowing from the Sunoco facility to Murphy Drive at this time. It was approximately 25 degrees Fahrenheit, mostly sunny, and there was a southwest wind at 5 to 10 MPH at the time of these observations. AQD staff arrived the company's office at 10:32 AM.

Upon arriving at the facility, AQD staff introduced themselves and stated the purpose of the visit to Mr. Tony Clauss, Station Manager (Ph: 810-364-6251). AQD staff asked Mr. Clauss if Mr. Dave Misaros, Plant Operator, was available to assist AQD staff with the inspection. Mr. Clauss said that Mr. Misaros was not at the location at the time of AQD staff's arrival. Mr. Clauss indicated that Sunoco Pipeline, L.P. is a crude oil storage and transport facility. The facility operates 24 hours a day, 7 days a week and 2 employees are generally on site at all times. Mr. Clauss assisted AQD staff during the inspection and provided AQD staff with the contact information for Mr. Ron O'Toole, Senior Manager of Environmental Compliance, for Sunoco. Ms. Jennifer Roberts, the previous Environmental Compliance Specialist for the facility, left the company in early January 2015.

**FACILITY OVERVIEW**

Sunoco Pipeline, L.P.'s Marysville facility receives crude oil from 2 Enbridge pipelines and from local oil wells. The Enbridge pipelines originate in the province of Alberta in Canada and are adjacent to the Sunoco facility. The oil from local wells is delivered to the facility by trucks in a crude oil unloading area near the northeast corner of the property. Once crude oil arrives at Sunoco, it is sent to one of 6 crude oil storage tanks (EUTANK 34, EUTANK41, EUTANK43, EUTANK44, EUTANK45, and

EUTANK46) ranging from 4 million gallons to 11.5 million gallons in volume. EUTANK36 is also permitted, but this tank has been disassembled and is no longer at the facility. EUTANK43 has not been used since April 2014 due to ongoing maintenance and repairs. From the storage facility, the oil is transported to the Marathon Refinery in southwest Detroit, British Petroleum's refinery in Toledo, Ohio, and the Toledo Refining Company. Oil is generally stored in the tanks less than 2 days prior to being sent to these refineries. EUTANK44, EUTANK45, and EUTANK46 are subject to the requirements of New Source Performance Standard (NSPS) Subpart Kb for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. EUTANK44, EUTANK45, and EUTANK46 were constructed in 1987, 1994, and 2007, respectively. EUTANK34, EUTANK41, and EUTANK43 were constructed in 1960, 1961, and 1967, respectively, and are, therefore, not subject to NSPS Subparts K, Ka, or Kb for Petroleum Liquid Storage Vessels (NSPS Subpart K applies to tanks constructed between June 11, 1973 and May 19, 1978, and NSPS Subpart Ka applies to tanks constructed between May 18, 1978, and July 23, 1984). Other than the crude oil storage tanks, the facility has 5 electric pumps which are used to pump oil into and out of the storage tanks, a small propane heater in the maintenance garage, electric furnaces in the drop ceiling of the company's office, and a natural gas-fired 25 kW Generac emergency generator manufactured in 2010. The emergency generator is used to provide electricity for lighting and for the mechanical gate at the entrance to the facility in the event of a power outage. The Generac emergency generator is Subject to MACT Subpart ZZZZ for Reciprocating Internal Combustion Engines, but the AQD has not accepted delegation for this subpart at area sources of hazardous air pollutant emissions.

### **COMPLIANCE DETERMINATION**

The company conducts monthly inspections on each of the 6 active storage tanks. PTI #178-98B only requires that inspections be conducted on the 3 tanks subject to NSPS Subpart Kb (EUTANK44, EUTANK45, and EUTANK46), however, so AQD staff only collected monthly inspection records for these tanks. Monthly inspection records for these 3 tanks for the 2014 calendar year are attached to this report. NSPS Subpart Kb only requires that the tanks be visually inspected every 5 years, but the company visual inspects the required NSPS Subpart Kb elements annually. If a problem is found to exist with the tanks during a visual inspection, the facility has 45 days from the date the problem was identified to correct the problem. Annual visual inspection reports for EUTANK44, EUTANK45, and EUTANK46 for 2013 and 2014 are attached to this report. As a result of the VN sent to the company on October 7, 2014, it was determined that EUTANK44's secondary seal was leaking during an October 10, 2014, inspection by Mott Inspection Company. Mott Inspection Company repaired EUTANK 44's secondary seal on November 19, 2014 (40 days after the leak was initially detected). Mott Tank Service then conducted a November 20, 2014, follow-up inspection on EUTANK44's secondary and primary seal and found no deficiencies. Inspection reports from Mott Inspection Company for inspections conducted on the internal floating roof and associated components of EUTANK44 from October 10, 2014, October 30, 2014, and November 20, 2014, are attached to this report.

After collecting tank inspection records from Mr. Clauss, AQD staff spoke with Mr. Ron O'Toole, Senior Manager of Environmental Compliance with Sunoco Logistics, on the phone in the company's office to determine compliance with the remainder of PTI #178-98B. The company's PTI sets 12-month rolling throughput limit of 194,565,000 barrels for FGTANKFARM. 12-month rolling throughput records from January 2014 through December 2014 indicate that highest 12-month rolling throughput of crude oil through the facility was 58,166,536 barrels occurring from October 2013 through September 2014. All of the tanks are equipped with an internal floating roof, a welded deck, a mechanical shoe primary seal, and a rim-mounted secondary seal to limit potential fugitive VOC emissions as required by the PTI. 12-month rolling VOC and individual HAP emission records are also being maintained by the company. 12-month rolling records from January 2014 through December 2014 indicate that highest emission of VOCs was 14 tons occurring from March 2013 through February 2014, April 2013 through March 2014, and May 2013 through April 2014. During the same time period, the highest 12-month rolling time period emission of an individual HAP was 0.12 tons of

xylene occurring at the end of each month during the 2014 calendar year. The company is required to calculate 12-month rolling aggregate HAP emissions, but only 12-month individual HAP emissions are being recorded. 12-month rolling HAP aggregate emissions are far less than 1 ton per year based on the 12-month rolling individual HAP emissions reported by the company. AQD staff asked Ms. O'Toole to add another column to the company's emission calculation spreadsheet for aggregate HAP emission calculations going forward.

After going over the PTI and its recordkeeping requirements, Mr. Dave Misaros (Mr. Misaros arrived halfway through the inspection) drove AQD staff to the crude oil unloading area near the northeast corner of Sunoco's property. Upon arriving at the unloading area, it was noted that one crude oil tanker was unloading product and that another crude oil tanker was waiting to unload its product. Mr. Misaros left the area for 10 to 15 minutes to attend to other business and AQD staff conducted odor observations downwind of the unloading area while unloading was taking place. Very faint, intermittent crude oil odors were detected during this time. As part of its response to AQD staff's October 7, 2014, VN, the company cleaned the top of the unloading area sump tank, installed an air tight lid on the sump tank, and encapsulated the entire sump tank with a corrugated plastic material to limit fugitive emissions from the unloading process. The work on the unloading area started on January 16, 2015, and was completed on January 17, 2015.

Rule 706 does not appear to be applicable to the facility's crude oil unloading operation. Rule 706 applies to the loading of delivery vessels with organic compounds having a true vapor pressure of less than or equal to 1.5 psia at loading facilities handling more than 5,000,000 or more gallons of the compounds a year. The loading of delivery vessels does not take place at the facility. The unloading of crude oil from delivery vessels takes place at the facility. Therefore, the requirements in Rule 706 for the delivery vessel to have a submerged fill pipe and for the delivery vessel to be equipped with a vapor recovery system during unloading are not applicable to the facility's crude oil unloading operation.

Crude oil is still not being accepted into EUTANK43. EUTANK43 suffered a catastrophic roof failure during April 2014. As a result of the roof failure, the tank had to be completely rebuilt and the tank was hydrostatically tested for leaks on January 23, 2015. The company anticipates that usage of this tank will resume within the next few months. After conducting odor observations downwind of the unloading area, AQD staff and Mr. Misaros drove back the company's office to wrap up the inspection. AQD staff informed Mr. Misaros that the facility appeared to be in compliance with the conditions of its PTI and all other applicable air regulations. AQD staff left the company's office at 1 PM.

After leaving the company's office, AQD staff, once again, conducted odor observations downwind of the facility along Murphy Drive. No odors were detected from 1:00 PM until 1:15 PM during this time. AQD staff attempted to speak with Ms. Vanessa Davis of 239 Murphy Drive at 1:17 PM, but she was not home. Therefore, AQD staff left a business card in Ms. Davis' doorway. No odors were detected in front of Ms. Davis' house from 1:17 PM until 1:22 PM. The wind was blowing directly from the crude oil unloading facility to Ms. Davis' house at this time and crude oil was being unloaded.

Based on this inspection, it was determined that Sunoco Pipeline, L.P.'s Marysville facility is in compliance with the conditions of its PTI and all other applicable air rules and regulations. The records cited are attached in the order in which they were cited in this report. The company has adequately addressed the October 7, 2014, VN for nuisance odors and AQD staff recommends that the VN be resolved.

NAME Erik Durban

DATE 2/5/15

SUPERVISOR CTE