

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

B777854567

FACILITY: Buckeye Terminals, LLC - Ferrysburg Terminal		SRN / ID: B7778
LOCATION: 17806 NORTH SHORE DRIVE, FERRYSBURG		DISTRICT: Grand Rapids
CITY: FERRYSBURG		COUNTY: OTTAWA
CONTACT: Matthew Sanders , Terminal Operator		ACTIVITY DATE: 08/13/2020
STAFF: Chris Robinson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY '20 on-site inspection to determine the facility's compliance status with applicable air quality rules and regulations including PTI no. 347-96B.		
RESOLVED COMPLAINTS:		

On August 13, 2020, Chris Robinson (CR) from the Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) met with Matthew Sanders, Terminal Operator for Buckeye Terminals LLC (SRN B7778) in Ferrysburg, Ottawa County, Michigan. Per recent field work guidance this inspection was scheduled in advance to ensure proper staff would be onsite as well as to prepare for any Covid19 related entry procedures. Proper PPE and social distancing were maintained throughout the inspection. No visible emissions or odors were observed during this inspection. Per Mr. Sanders there have been no equipment modifications or additions since the last inspection conducted on August 2, 2016.

Records were requested, provided and reviewed in July 2020. Based on those records the facility appeared to be operating in compliance with the recordkeeping, emission limits, and material limits specified in Permit to Install (PTI) No. 347-96B (See Activity Report CA_B777854211).

Facility Description

Buckeye Terminal, LLC (Buckeye) is a fuel distribution facility that obtains product via pipeline in cycles. The facility also obtains ethanol and biodiesel via tanker trucks. Mr. Sanders indicated that tanks seven (7) and eight (8), which are dedicated to holding biodiesel, have been empty since the last inspection.

Compliance Evaluation

Buckeye (SRN B7778) operates under PTI 347-96B and is subject to several federal regulations including New Source Performance Standards (NSPS) 40 CFR Part 60 Subpart XX for Bulk Gasoline Terminals, and National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 60 Subpart BBBBBB for Gasoline Distribution Bulk Terminals and NESHAP 40 CFR Part 63 Subpart CCCCCC for Gasoline Dispensing Facilities. Michigan is not currently delegated enforcement of NESHAP Subparts BBBBBB and CCCCCC, thus compliance with these standards was not reviewed.

A) PTI No. 347-96B

EULOADRACK:

During the 8/17/2020 inspection CR observed the loading rack (EULOADRACK), Tanks (FGTANKS), the Vapor Combustion Unit (VCU), and the Vapor Recovery Unit (VRU). Per Mr. Sanders the VCU has not been used many years and is currently not operational. The fuel supply and gas lines have been disconnected with the intent of scrapping in the near future. A truck loading fuel was observed with proper connection to the VRU which was also operating as required per EULOADRACK, SC III.1. Per Sanders the system is designed so that if there is an issue with the VRU, the loading rack is disabled. Rule 706 requirements appear to have been addressed through quarterly preventative maintenance which includes the pressure-

vacuum relief valves, drainage devices, written procedures and a vapor tight collection line. Example maintenance and leak inspection forms are attached.

Testing of Volatile Organic Compound (VOC) emissions per ERLOADRACK, SC V.1 is not being required at this time. Based on the July 2020 records review the facility appears to be in compliance with the emission limits (SC I.1-5), Material limits (SCII.1) and monitoring/recordkeeping requirements (VI.1-3) of the permit (See Activity Report CA_B777854211).

The VRU is equipped with a CEMS unit for VOC's. A Relative Accuracy Test Audit was last completed on the CEMS on March 12, 2018. No issues were noted.

FGTANKS:

This flex group consists of a group of fuel storage tanks (tanks 1-5, tank 9 and tank 13). These tanks are subject to a VOC emission limit, material limit and a monitoring/recordkeeping requirement, all of which were previously assessed in July 2020 and found to be acceptable and within limits specified in the PTI (See Activity Report CA_B777854211).

FGLDRK&TANKS:

The section houses the facility's source-wide Title V Opt-Out emission limits. Records were requested, provided and reviewed in June 2020 and found to be acceptable and within limits specified in the PTI (See Activity Report CA_B777854211).

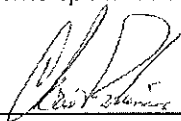
B) MAERS

Emissions data for 2019 was received on time on March 5, 2020. The audit was initially failed due to missing information, which was provided upon request. No changes were made to the revised submittal and it was approved by the AQD on April 13, 2020. The 2019 MAERS report is summarized below.

Pollutant	Amount (Lbs.)
VOC	57,569.86 (28.78 tons)

Conclusion

Buckeye appears to be in compliance with applicable air quality rules and regulations which include the requirements specified in PTI No. 347-96B.

NAME 

DATE 8/28/2020

SUPERVISOR 