

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

B908538748

FACILITY: BUCKEYE TERMINALS- NILES WEST TERMINAL		SRN / ID: B9085
LOCATION: 2150 SOUTH 3RD STREET, NILES		DISTRICT: Kalamazoo
CITY: NILES		COUNTY: BERRIEN
CONTACT: Tony Kozel , Terminal Operator		ACTIVITY DATE: 02/22/2017
STAFF: Matthew Deskins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced Scheduled Inspection		
RESOLVED COMPLAINTS:		

On February 22, 2017 AQD staff (Matt Deskins) went to conduct an unannounced scheduled inspection of the Buckeye Terminals (B9085) facility located in Niles, Berrien County. The facility is a petroleum bulk storage terminal and has three gasoline storage tanks and a loading rack that are covered under permit to install number 586-92A (an opt-out permit). The facility may also be subject to 40 CFR Part 63 Subpart BBBBBB (Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities) but this inspection will not be determining compliance with this regulation since the AQD isn't delegated by the EPA to enforce it. Staff departed for the facility after inspecting another facility nearby and having lunch.

Staff arrived at the Buckeye Terminals facility at approximately 12:45 p.m. There was no one there so staff went to the other Buckeye facility located just down the road. When staff arrived at that location they proceeded into the office area and signed in. Staff was then greeted by Tony Kozel who is one of the terminal operators. Staff introduced them self to Tony, whom he remembered from a previous inspection, and then stated the purpose of the visit. Tony then asked what staff needed to see? Staff responded by saying they would like to go over the permit requirements and review any records required to be kept by it. Staff then proceeded into Tony's office to go over things. The following is a summary of staff's discussions with Tony and the compliance status with the permit requirements.

Buckeye refers to the (B9085) terminal as the west terminal. Tony said there still aren't any employees based out of that terminal and that they still operate it from the southeast terminal (B9132) where we were currently located. He said that they do go down there every day to check on things. He said the terminal is still being used mainly for diesel operations (ULSD) and two of the three gasoline storage tanks (Tanks 1 and 2) are still completely empty and have been for years. He said Tank 3 contains diesel trans-mix and Tanks 4 and 5 are strictly diesel tanks. He said that they only get about one tanker a day loading out ULSD and that the loading out of trans-mix is very sporadic. He went on to state that he doubts that terminal will ever be used again for gasoline products due to demand and the fact they have the other terminal nearby. He stated that they may look in the future to use the two empty tanks to store more distillate products. Staff then asked if they still use the Vapor Combustion Unit (VCU) even while loading diesel products. He said that they do and that the corporate office requires it. Staff then started through the permit conditions with Tony and the following are the special conditions along with staff's comments regarding them.

**EULOADRACK (Two Bay Loading Rack and Associated Control Device)**

**SC 1.1a and 1.1b: COMPLIANCE.** These conditions pertain to VOC emission limits that have to be determined through stack testing which the AQD hasn't requested.

**SC 1.2a and 1.2b: COMPLIANCE.** These conditions state that the facility cannot exceed the throughputs of 90,000 gallons per hour nor 23,000,000 gallons per month of gasoline in the Loadrack. They haven't used the terminal for gasoline loading/dispensing in quite a number of years. As mentioned previously, Tony said that due to demand and the fact they have the other terminal nearby, they probably will never use the terminal for gasoline again.

**SC 1.3: COMPLIANCE.** The loading rack is equipped with a vapor tight collection line which collects vapors during tanker loading and sends them to a control device (flare) as required. Staff was told that they continue to use the flare even for diesel loading.

**SC 1.4: COMPLIANCE.** The facility appears to be complying with all the provisions of AQD Rules 609 and 627. These rules mainly pertain to vapor collection, delivery vessel testing, and equipment inspections.

**SC 1.5: COMPLIANCE.** The facility has a malfunction abatement plan (MAP) and it is a program they have on

their computer called JDE. It is also somewhat of a Preventative Maintenance Program and it tracks when maintenance is required on all equipment and documents what is done. The facility does some of their own maintenance on equipment as well as having outside contractors work on equipment as necessary.

**SC 1.6: COMPLIANCE.** This requirement pertains to revising the MAP should it fail to address any malfunctions that occur. It doesn't appear that it has needed any revisions to date.

**SC 1.7: COMPLIANCE.** The facility has a vapor recovery system installed and it appears they appear to be maintaining and operating it properly. The facility also has written procedures posted for operating the vapor control unit by the loadout racks.

**SC 1.8: COMPLIANCE.** This condition requires that the facility complete all monthly calculations specified in any recordkeeping, reporting, or special condition which they are doing.

**SC 1.9: COMPLIANCE.** The facility is maintaining records of throughputs for each petroleum product through the loadout racks for each calendar month and 12-month rolling time period. As mentioned earlier, the terminal has strictly been used for diesel or diesel trans-mix service for a number of years and they are documenting throughputs.

**SC 1.10: COMPLIANCE.** The facility is maintaining monthly VOC emission records for the loadout rack pertaining to controlled emissions, fugitive emissions, and miscellaneous emissions.

**SC 1.11: COMPLIANCE.** The facility is maintaining maintenance records for the loadout rack and control device as specified in the MAP (their JDE computer program).

**SC 1.12: COMPLIANCE.** The stack on the John Zinc flare for the vapor recovery unity appears to be 96 inches in diameter and 45 feet high as listed in the permit.

**FGIFRTANKS (The three tanks (Tanks #1-3) with the internal floating roofs)**

**SC 2.1a: COMPLIANCE.** This requirement states that the facility cannot exceed 14.7 tons of VOC per 12 month rolling time period. Records staff reviewed showed the most recent (Feb. 2016 – Jan. 2017) emission amount being 1.63 tons.

**SC 2.2 and 2.3: COMPLIANCE.** The facility appears to be complying with the provisions of AQD Rules 607, 627, and 604.

**SC 2.4, 2.4a, 2.4b, and 2.4c: COMPLIANCE.** Staff did not go up to check but was told that the tanks are equipped with internal floating roofs, welded decks, liquid mounted primary seals, and have a secondary seal as required.

**SC 2.5: COMPLIANCE.** The facility is maintaining emission records in an acceptable format.

**SC 2.6: COMPLIANCE.** The facility is maintaining records of both monthly and 12-month rolling totals of each specific petroleum product through the tanks.

**SC 2.7: COMPLIANCE.** The facility is maintaining records of both monthly and 12-month rolling totals of VOC emissions from the tanks.

**FGFACILITY (Facility Wide Conditions)**

**SC 3.1a: COMPLIANCE.** The facility's VOC emissions cannot exceed 70 tons per year based on a 12-month rolling time period. Records reviewed by staff indicated the most recent (Feb. 2016 – Jan. 2017) 12-month period being 2.02 tons.

**SC 3.1b: COMPLIANCE.** The facility does not have an individual HAP emission exceeding 9 tons per year based on a 12-month rolling time period.

**SC 3.1c: COMPLIANCE.** The facility's total HAP emissions cannot exceed 22.5 tons per year based on a 12-month rolling time period. Records reviewed by staff indicated the most recent (Feb. 2016 – Jan. 2017) time period being 0.19 tons.

SC 3.2: COMPLIANCE. The required emission calculations are being completed in an acceptable format.

SC 3.3: COMPLIANCE. The facility is maintaining the records as required by SC 3.1a, 3.1b, and 3.1c.

INSPECTION SUMMARY: The facility appears to be in COMPLIANCE with the terms and conditions of Permit No. 586-92A at the present time. Staff thanked Tony for his time and departed the facility at approximately 1:45 p.m.

NAME Matt Dorkin

DATE 2-27-17

SUPERVISOR MO 3/6/2017