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Manila
Washtenaw

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

N220424844

FACILITY: MARATHON PIPE LINE LLC		SRN / ID: N2204
LOCATION: 12433 ELLSWORTH RD, CHELSEA		DISTRICT: Jackson
CITY: CHELSEA		COUNTY: WASHTENAW
CONTACT: Raymond Price, Facilities Manager		ACTIVITY DATE: 04/10/2014
STAFF: Diane Kavanaugh-Vetort	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Conducted complete scheduled inspection. Permitted Minor Source; Cat II Fee Source: NSPS Subpart Kb; also MACT (6) B subject. Facility is idled and has not operated for many years @10.		
RESOLVED COMPLAINTS:		

On April 10, 2014, I conducted a complete, self-initiated compliance inspection of the above Marathon Pipe Line (MPL) facility location referred to as Freedom Township site. The inspection was announced a short time prior to this date because this is an unmanned station that is not currently operational but is maintained for potential future production/use. The purpose of the inspection was to determine the facility's compliance status with applicable federal and state air pollution control regulations specifically, Act 451, Part 55, the administrative rules, and their Air Use Permit to Install No. 540-89B. The facility is subject to New Source Performance Standard (NSPS) 40 CFR 60 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.

I arranged to meet contact Raymond Price at the site in the morning. Ray works out of Marathon's Wood Haven facility and has also worked with me recently at another Marathon Pipe Line site in Samaria. I initially contacted Gary Wilson, Marathon, out of Finley, Ohio because he is my primary contact for the Air Use Permit for Samaria and was involved during my last inspection of the Freedom Twp. location.

The last AQD inspection of the site was conducted in 2009. MPL-Freedom installed and (formerly) operated three 55,000 barrel storage tanks (2 gasoline & 1 distillate) and one 2,000 barrel slop tanks (pipeline interface). I verified with Ray that the facility's status is the same. The conversion is there are 42 gallons per barrel. MPL-Freedom receives and submits MAERs annually. However they have reported zero throughput of gasoline and diesel since approximately 2002/2003. Their last PTI revision was to increase material throughput and to change a special condition that required internal floating roofs on all tanks to allow for the one diesel tank to not have this requirement. MPL -Freedom is a Fee subject, Category II NSPS source. The facility/tanks have been installed/operating since the late 80's early 90's and were operational when the Fee system was instituted. MPL has only owned the Facility for about 15 years. The Company's PTI (including revisions) contains a special condition requiring compliance with the NSPS.

Upon my arrival to the site, I met Raymond Price and he accompanied me during the inspection. He verified that MPL continues to maintain the Corrosion protection system (cathodic) for the storage tanks so that the bottoms don't corrode. He said the Tanks are empty. They also maintain the dike water, yard, signage, and security. During the inspection there was no other persons at the site and no activities going on.

I asked Ray about information I obtained during the prior inspection related to MPL then conducting a comprehensive study/evaluation of the facility related to re-starting it again. They were looking at it as a potential backup storage facility for the Marathon Detroit Plant's expansion/construction. He said that the Enbridge pipe line from Toledo to Stockbridge meant that they did not need to use the Freedom facility in this way. MPL wants to continue to maintain the Freedom facility as an "idled" site, keeping the permit active.

Ray informed me that the only change made to this facility is that they removed a pump from one of the Tanks to use at another site. It appears they may scavenge parts from these tanks as needed. Minor parts and maintenance type items should not effect the existing permit. I reminded Ray that MPL-Freedom is bound by their existing PTI, but since they are not operating the throughput record keeping is currently not applicable. MPL needs to consult the Act 451, Part 55, Rule 201 and the exemptions, and evaluate the applicability to any proposed modifications or revisions to the existing process equipment or installation of new equipment. Rule 201 requires they do this prior to making significant proposed changes.

COMPLIANCE SUMMARY

Marathon Pipe Line, LLC -Freedom Twp. was determined to be in substantial compliance with state and federal air pollution control regulations and conditions of their PTI 540-89B. MPL-Freedom is designated as a NSPS Subpart Kb, Cat II source and at this time only the annual Facility charge is billed due to zero emissions reported.

It is noted that following the 2009 inspection I spoke with Gary Wilson, and he was aware that the Freedom site is also designated as an applicable source under the federal 40 CFR Part 63 (Area Source MACT) Subpart BBBBBB as a Pipeline Breakout Station. He said they did not submit an Initial Notification to EPA because of the station's idle status. I advised him at that time to review the Final Rule and make sure of the applicable requirements. AQD does not currently have delegation of authority for this Area MACT Standard.

NAME DATE 4/15/14SUPERVISOR 