

N6654
 manila
 Ingham

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

N665443196

FACILITY: Wolverine Pipe Line Company		SRN / ID: N6654
LOCATION: 2499 Grimes Rd, DANSVILLE		DISTRICT: Lansing
CITY: DANSVILLE		COUNTY: INGHAM
CONTACT: Spencer Welling , Field Regulatory Specialist		ACTIVITY DATE: 01/30/2018
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection of facility which was last inspected in 2011.		
RESOLVED COMPLAINTS:		

On 1/30/2018, the Michigan Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted a scheduled inspection of Wolverine Pipe Line Company's Stockbridge Station at 2499 Grimes Road, Dansville, Ingham County.

Environmental contacts:

Spencer Welling, Field Regulatory Specialist; 269-548-9865; spencer_welling@wplco.com

Steve Iseminger, Safety/Health & Environmental Supervisor; 269-323-2491 ext. 120; steve_isevinger@wplco.com

Facility description:

This facility is a pipeline break out station.

Emission units:

Tank	Tank description	PTI No.	Federal regulation, if applicable	Compliance status
5010	Cone roof tank with IFR	378-77A	40 CFR Part 63, Subpart BBBBBB	Compliance
5020	Cone roof tank (diesel) with fixed roof	378-77A	40 CFR Part 63, Subpart BBBBBB	Compliance
5030	Cone roof tank with IFR	378-77A	40 CFR Part 63, Subpart BBBBBB	Compliance
5040	Slop tank, with IFR	127-00A	40 CFR Part 60, Subparts A & Kb; 40 CFR Part 63, Subpart BBBBBB	Compliance

Regulatory overview:

There are 5 petroleum storage tanks at the Stockbridge Station. 4 are owned by Wolverine Pipe Line Company. The fifth (#621) is owned by Marathon. The loading and unloading of tank #621 is managed by Wolverine Pipeline. The two sources were originally considered one State Registration Number (SRN), N6654. In 2008 the sources were split so that emissions reporting and air fee payments could be made by the appropriate responsible parties. It should be understood that, for the purpose of determining major source status in accordance with Title V of the Clean Air Act and as explained in Operational Memo #11, these two SRNs must be considered as one source.

Combined these two sources are considered a *minor source* rather than a major source of *criteria air pollutants*, that is, those pollutants for which a National Ambient Air Quality Standard exists. These include carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds (VOCs), lead, particulate matter smaller than 10 microns (PM10), and particulate matter smaller than 2.5 microns (PM2.5). A major source has the potential to emit (PTE) of 100 tons per year (TPY) or more of any one of the criteria pollutants.

This facility is considered to be a minor source or *area source* for hazardous air pollutants (HAPs). The PTE is considered to be under the major source HAP thresholds of 10 TPY for a single HAP, or 25 TPY for aggregate HAPs.

Wolverine Pipe Line's Stockbridge Station is subject to 40 CFR Part 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, for tank #5040, the slop tank (EUSLOPTANK). It is also subject to 40 CFR Part 63, Subpart BBBB, National Emissions Standards for Hazardous Air Pollutants for Source category: Gasoline Distribution Bulk terminals, Bulk Plants, and Pipeline Facilities, also known as the MACT subpart 6B, because it is an area source, it is a pipeline break out station, and it handles gasoline.

There does not appear to be a boiler onsite, so the facility is not subject to 40 CFR Part 63, Subpart JJJJJ, *National Emissions Standards for Hazardous Air Pollutants Industrial, Commercial, and Institutional Boilers Area Sources.*

Fee status:

This facility is not considered category I fee-subject, because it is not a major source for criteria air pollutants. It is considered category II fee-subject because it is subject to a federal New Source Performance Standard (NSPS). It is not considered category III fee-subject, even though it is subject to a federal Maximum Achievable Control technology (MACT) standard, because it is already Category II fee-subject. This facility reports annual air emissions each year, via the Michigan Air Emissions Reporting System (MAERS).

Location:

Wolverine Pipe Line is located on Grimes Rd. between White Oak and Stockbridge Townships in Ingham County. The property is adjacent to Enbridge Pipeline property immediately to the south. A single tank operated by Marathon is located on the Wolverine Pipeline. The location is rural. It is surrounded by a mix of agricultural and residential properties. The nearest residences are immediately to the southwest of the site.

Recent history:

In early 2011, gasoline was discovered in a ditch near the Wolverine location. A leaking flange was discovered on Marathon's tank #681 at the site, and Marathon took responsibility for the spill. The scope of the spill was estimated upwards of 500,000 gallons. Marathon hired Arcadis to manage the remediation.

The Wolverine Pipe Line facility was most recently inspected on 11/28/2011 by AQD, and found to be in compliance.

Arrival:

AQD was represented by the AQD Lansing District Office's newest inspector, Ms. Kelly Richart, and by myself. This was not an unannounced inspection, as it was necessary to make certain that a facility environmental contact would be onsite at the time of the inspection.

We checked for odors, prior to arrival onsite. No odors were detectable downwind of the Wolverine Pipe Line facility. Weather conditions were cloudy and 23 degrees F, with winds out of the west northwest at 5-10 miles per hour.

We met with Mr. Steve Iseminger, Safety/Health & Environmental Supervisor. We also met with Mr. Adam Little, Team Lead - Site Safety for Wolverine Pipe Line Company. We provided our identification/credentials, per AQD procedure. We signed in on their visitor registration log.

Inspection:

We were informed that there have been no changes to operations this year. We were told that there is no crude on site, as this site only handles gasoline or diesel fuel. We were informed that they do weekly inspections here, log any issues, and make repairs if an issue is found.

3 cone roof tanks, #5010, 5020, and 5030; PTI No. 378-77A:

Three 4.2 million gallon storage vessels are used to store diesel and gasoline. Construction of the tanks was approved by PTI #378-77. In 1999 the permit was amended as PTI #378-77A, which allowed for the switch from storing crude oil to diesel and gasoline. The vessels have coned exterior roofs with internal floating roofs. The tanks are identified by Wolverine as #5010, #5020, and #5030.

We were informed that tanks #5010 and 5030 are each equipped with an internal floating roof (IFR), for controlling emissions. Tank #5020 is not equipped with an IFR because it is a diesel storage tank, we were advised.

These tanks are limited to 22.0 TPY VOC and 2.0 TPY HAPs by PTI No. 378-77A. The MAERS report for the 2017 operating year reported site wide emissions as 10.61 TPY. The emissions from the cone roof tanks can be separated from the 1.36 tons of VOC estimated to be emitted by tank #5040, the slop tanks, please see below.

- Tank #5010; cone roof with IFR: 7.66 tons VOC
- Tank #5020; cone roof with fixed roof; diesel fuel: 0.56 tons VOC
- Tank #5030; cone roof with IFR: 0.0 tons VOC
- Fugitive emissions for entire site: 0.98 tons VOC
- Total for cone roof tanks and site-wide fugitive emissions: 9.25 tons VOC, below the 22.0 TPY VOC limit for PTI No. 378-77A.

VOC emissions and throughput of fuel were reported to MAERS for the 2017 calendar year.

Tank #5010 appeared to have no visible leaks, nor any visible emissions. It appeared free of rust, except for minor rust on bolts on a flange. There was a very brief smell of gasoline in the vicinity of this tank.

Tank #5020 appeared to have no visible leaks, and no visible emissions. It also appeared free of rust, except for minor rust on bolts on a flange. There was a barely detectable odor of diesel in the vicinity.

Tank #5030 appeared to have no visible leaks, nor any visible emissions. It also appeared free of rust, except for minor rust on bolts on a flange. I detected no odors in the vicinity of this tank.

Tank #5040 (slop tank), PTI No. 127-00A:

A 5,000 barrel vessel, tank #5040 (EUSLOPTANK) is used to store mixed products when the pipeline is switched between diesel and gasoline. Construction of the tank was approved by Permit to Install (PTI) #127-00. This permit was revised as No. 127-00A, to allow for an increase in throughput. The mixture of comingled gasoline and diesel fuel is termed "transmix" or sometimes "slop". The vessel has a coned roof with an internal floating roof. The internal floating roof has a mechanical shoe seal. The Tank is identified by Wolverine as #5040.

Tank #5040 is subject to New Source Performance Standard (NSPS) subpart Kb requirements. Because Wolverine Pipe Line has an NSPS affected facility, records of throughput and emissions are being maintained and reported to Michigan Air Emissions Reporting System (MAERS). The TANKS Model Software is used for the emissions calculation.

Under PTI No. 127-00A, tank #5040 or EUSLOPTANK is limited to 2.0 TPY VOC emissions. As reported to MAERS for the 2017 operating year, VOC emissions from tank #5040 were 1.36 tons, below the permitted limit.

PTI No. 127-00A prohibits the storage of any petroleum product in tank #5040 with a vapor pressure greater than 1.5 psia unless EUSLOPTANK is equipped with an IFR roof. It is my understanding that tank #5040 does have an IFR roof. We were told that there was no product in the tank over 1.5 psia, to the knowledge of our contact(s).

The PTI No.127-00A requires product-specific records be kept for tank #5040. We were told that these are kept in their main office in Portage. This is acceptable, as the records could be made available within a short time, upon request.

PTI No. 127-00A requires that the permittee comply with all provisions of 40 CFR Part 63, Subpart BBBBBB, as they apply to tank #5040. We were assured that they are complying with this. Please see discussion on Subpart BBBBBB-required semi-annual compliance reports, later in this activity report.

Tank #5040 did not have any visible leaks, nor any visible emissions. Odors could not be detected in the vicinity of the tank.. I noticed what appeared to be small amounts of mold on this tank, but did not notice rust.

Remediation

A fourth large tank, #681, is also located on the Wolverine Pipe Line property and belongs to Marathon. It is regulated under PTI No. 58-00, and is assigned SRN M4097. This tank was determined to be the cause of gasoline contamination surrounding the property. Arcadis was hired by Marathon to manage the cleanup. For more information on the cleanup, please see the district file for SRN M4097. Tank 58-00 was inspected in 2015 by AQD, and found to be in compliance.

Recent recordkeeping/reporting:

Semi-annual compliance report was received on 7/13/2017, per Subpart BBBBBB, indicating no reportable leaks or other excess emission events. Also, tanks equipped with fixed roof in combination with an IFR and a mechanical shoe, inspections completed, records kept onsite, and no repairs to control equipment subsequent to visual inspections finding damage.

Semi-annual compliance report was received on 1/12/2018, per Subpart BBBBBB, indicating no reportable leaks or other excess emission events. Also, tanks equipped with fixed roof in combination with an IFR and a mechanical shoe, inspections completed, records kept onsite, and no repairs to control equipment subsequent to visual inspections finding damage.

Semi-annual compliance report was received on 7/17/2018, per Subpart BBBBBB, indicating no reportable leaks or other excess emission events. Also, tanks equipped with fixed roof in combination with an IFR and a mechanical shoe, inspections completed, records kept onsite, and no repairs to control equipment subsequent to visual inspections finding damage.

The MAERS report for the 2017 operating year received timely and complete. Changes in emissions fairly consistent with changes in throughput. Tank model used. Please see below for compliance check with permitted VOC emissions limits:

2017 operating year emissions reported to MAERS:

Tank	2017 VOC emissions (tons)	Permitted VOC limits	Compliance?
5010; cone roof, IFR	7.66	22.0 TPY for all 3 cone roof tanks combined	Yes
5020; cone roof, fixed roof, diesel	0.56	22.0 TPY for all 3 cone roof tanks combined	Yes
5030; cone roof, IFR	0	22.0 TPY for all 3 cone roof tanks combined	Yes
5040; slop tank, IFR	1.36	2.0 TPY	
Fugitive emissions for site	0.98	NA	NA
All tanks combined	10.61	22.0 + 2.0 = 24.0	Yes

Conclusion:

No instances of noncompliance were found.

We left the facility at about 12:45 PM.

NAME 

DATE 9/28/2018

SUPERVISOR 