

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

N755738756

FACILITY: WOLVERINE PIPELINE COMPANY		SRN / ID: N7557
LOCATION: 2232 SOUTH THIRD STREET, NILES		DISTRICT: Kalamazoo
CITY: NILES		COUNTY: BERRIEN
CONTACT: Steve Iseminger,		ACTIVITY DATE: 02/22/2017
STAFF: Matthew Deskins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced Scheduled Inspection		
RESOLVED COMPLAINTS:		

On February 22, 2017 AQD Staff (Matt Deskins) went to conduct an unannounced scheduled inspection of the Wolverine Pipeline (N7557) facility located in Niles, Berrien County. According to district file information, Wolverine Pipeline is a minor source that has one air permit (PTI No. 322-05) issued to them by the AQD for a storage tank and a load out rack. The intent of staff's inspection was to determine the facility's compliance with their air permit and any other state or federal air regulations that may apply to them and that the DEQ is delegated to enforce. Staff departed for the facility at approximately 9:45 a.m.

Staff arrived at the facility at approximately 11:05 a.m. The automated gate was closed and staff couldn't locate anyone. Staff then noticed that they were at the wrong Wolverine address and to be at the one about two addresses to the south. Staff then proceeded to that location and noted again that the automated gate was closed. Staff was then able to locate a call button and pressed it for assistance. The gate then opened and staff proceeded into the parking area. When staff was getting things out of their vehicle, an employee came out of the building to greet staff. The employee's name was David Brooks. Staff introduced them self to David and stated the purpose of the visit. David mentioned he wasn't aware of the air permit and mentioned that they no longer have the trans-mix load out rack, just the trans-mix storage tank. Staff mentioned that they would still need to look at the records as they pertain to the trans-mix tank.

David then tried calling Steve Iseminger who is the Safety/Health and Environmental Supervisor for Wolverine. Staff also noted that Steve was the one who had applied for the air permit back in 2005. Once David got Steve on the phone, he explained to Steve who staff was and what staff needed to see. David then gave the phone to staff to speak with Steve. Steve mentioned to staff that he was aware of the air permit and that the trans-mix load out was removed years ago. He said that throughputs are minimal through the tank and whenever throughput does go through it all goes to Buckeye Terminals. Staff then explained to Steve that they needed to see the records as they pertain to the trans-mix tank and facility totals. Staff asked and received Steve's e-mail address so that staff could tell him what records were needed. Staff later sent an e-mail to Steve on February 23 and a response was received back on February 25. The following are the permit conditions contained in PTI No. 322-05 and staff's comments regarding them.

PLEASE NOTE: Since the load-out equipment has been removed, staff will not be making any comments regarding EUNLOADING although the conditions pertaining to it will be listed below.

SPECIAL CONDITIONS

Emission Unit Identification

Emission Unit ID	Emission Unit Description	Stack Identification
EUNLOADING	Transmix truck loading using a submerged filling pipe.	NA
EUTRANSMIXTANK	210,000 gallon internal floating roof storage tank with a liquid-mounted polyurethane foam seal.	NA
Changes to the equipment described in this table are subject to the requirements of R336.1201, except as allowed by R336.1278 to R336.1290.		

Flexible Group Identification

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Flexible Group ID	Emission Units Included in Flexible Group	Stack Identification
FGFACILITY	All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment and exempt equipment.	NA

The following conditions apply to: EULOADING

Material Usage Limits

1.1 The EULOADING throughput shall not exceed 2,100,000 gallons per 12-month rolling time period, as determined at the end of each calendar month, of transmix. [R336.1205(3), R336.1702(a), R336.1901]

Process/Operational Limits

1.2 The permittee shall not load any delivery vessel unless it is equipped with a submerged fill pipe. [R336.1205(3), R336.1702(a), R336.1901]

Recordkeeping/Reporting/Notification

1.3 The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. [R336.1205(3), R336.1702(a), R336.1901]

1.4 The permittee shall keep records of the EULOADING throughput for each calendar month and 12-month rolling time period. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. [R336.1205(3), R336.1702(a), R336.1901]

The following conditions apply to: EUTRANSMIXTANK

Material Usage Limits

2.1 The EUTRANSMIXTANK throughput shall not exceed 2,100,000 gallons per 12-month rolling time period, as determined at the end of each calendar month, of transmix. [R336.1205(3), R336.1702(a), R336.1901]

AQD Comment: Appears to be in Compliance. Records reviewed by staff indicate that the 12-month rolling totals ending in January 2017 at 378 gallons. It appears that 1,134 gallons was the highest most recent 12-month rolling total. (See Attached)

Process/Operational Limits

2.2 The permittee shall not operate EUTRANSMIXTANK unless all provisions of Rule 604 are met. The provisions of Rule 604 include, but are not limited to, the following: [R336.1205(3), R336.1604, R336.1901, R336.1910]

- a) The vessel is equipped and maintained with a floating cover or roof which rests upon, and is supported by, the liquid being contained and has a closure seal or seals to reduce the space between the cover or roof edge and vessel wall. The seal or any seal fabric shall not have visible holes, tears, or other nonfunctional openings. [R336.1604(1)(b)]
- b) All openings, except stub drains, in any stationary vessel subject to the provisions of this rule shall be equipped with covers, lids, or seals so that all of the following conditions are met: [R336.1604(2)]
 - i) The cover, lid, or seal is in the closed position at all times, except when in actual use.
 - ii) Automatic bleeder vents are closed at all times, except when the roof is floated off, or landed on, the roof leg supports.
 - iii) Rim vents, if provided, are set at the manufacturer's recommended setting or are set to open when the roof is being floated off the roof leg supports.

AQD Comment: The tank appears to be in Compliance with 2.2a and 2.2b above.

Equipment

2.3 The permittee shall equip and maintain EUTRANSMIXTANK with the deck and seal configuration listed in the following table, or a deck and seal configuration that results in the same or lower VOC emissions from the tank.

Equipment	Deck Type	Primary Seal	Secondary	Applicable Requirement
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				Seal	
2.3a	EUTRANSMIXTANK	Welded	Liquid-mounted	NA	R336.1205(3), R336.1702(a), R336.1901, R336.1910

AQD Comment: The tank appears to be in Compliance with 2.3 and/or 2.3a above.

Recordkeeping / Reporting / Notification

2.4 The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. [R336.1205(3), R336.1702(a), R336.1901]

AQD Comment: Appears to be in Compliance.

2.5 The permittee shall keep records of the EUTRANSMIXTANK throughput for each calendar month and 12-month rolling time period. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. [R336.1205(3), R336.1702(a), R336.1901]

AQD Comment: Appears to be in Compliance.

The following conditions apply to: FGFACILITY

Emission Limits

	Pollutant	Equipment	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirements
5.1a	VOC	FGFACILITY	5.7 tpy	12-month rolling time period as determined at the end of each calendar month.	SC 5.3	R336.1205(3), R336.1702(a), R336.1901

AQD Comment: Appears to be in Compliance. With the loadout rack being removed and with very little throughput through the tank, VOC emissions are very minimal and do not come close to the limit.

Recordkeeping/Reporting/Notification

5.2 The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. [R336.1205(3), R336.1702(a), R336.1901]

AQD Comment: Appears to be in Compliance.

5.3 The permittee shall keep, in a satisfactory manner, records of monthly and 12-month rolling time period VOC emission rate calculations for FGFACILITY, as required by SC 5.1a. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. [R336.1205(3), R336.1702(a), R336.1901]

AQD Comment: Appears to be in Compliance.

INSPECTION SUMMARY: The facility appears to be in COMPLIANCE with the terms and conditions of Permit No. 322-05 at the present time. Staff thanked David for his time and departed the facility at approximately 12:00 p.m.

NAME Matt Dahn

DATE 2-28-17

SUPERVISOR MA 3/6/2017