



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Buckeye Terminals, LLC, Flint, MI

FROM: David Sutlin
AECAB (MN/OH)

THRU: Brian Dickens, Section Supervisor
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: Buckeye Terminals, LLC – Flint Terminal

Facility Location: G5340 North Dort Highway, Flint, Michigan 48505

Date of Inspection: April 11, 2022

EPA Inspector(s):

1. David Sutlin, Environmental Engineer
2. Brittany Cobb, Environmental Engineer

Other Attendees:

1. Chris Betts, Field Operator, Buckeye Terminals
2. Josh Gepford, Field Trainee, Buckeye Terminals
3. Ken Elby, Technician, Buckeye Terminals
4. Dan McGeen, Inspector, EGLE

Contact Email Address: cbetts@buckeye.com

Purpose of Inspection: The New Source Performance Standards (NSPS) at Subpart Kb and the National Emission Standards for Hazardous Air Pollutants (NESHAP) at Subpart BBBBBB prohibit or limit the amount of organic material (VOC) that can leak from tank roofs and associated equipment.

Facility Type: Petroleum products bulk terminal

Regulations Central to Inspection: NSPS Subpart Kb – Volatile Organic Liquid Storage Vessels; NESHAP Subpart BBBBBB – Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

Arrival Time: 2:15 PM ET

Departure Time: 5:45 PM ET

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☐ Provided Small Business Resource Information Sheet
- ☒ Small Business Resource Information Sheet not provided. Reason: Not a Small Business
- ☒ Provided CBI warning to facility

The following information was obtained verbally from facility personnel unless otherwise noted.

Process Description:

The facility consists of a tank farm to store various petroleum products, and a loading rack to fill tanker trucks. The facility stores subgrade gasoline, 91 octane gasoline, ethanol, ultralow sulfur diesel, “transmix”, and various additives. The facility receives most of its products via pipelines, except for ethanol and additives which are received from tanker trucks. Tanks which store gasoline and ethanol use an internal floating roof to control vapors. At the loading racks, as fuel is pumped into the trucks, a hose vents displaced vapors from the tanker to a vapor recovery unit (VRU) to control emissions. A vapor combustion unit is used as a back up to the VRU.

Staff Interview:

Among the various tanks at the facility, Tanks 1 & 15 hold subgrade gasoline, Tank 4 holds 91 octane gasoline, Tank 10 holds ethanol, and Tanks 3 & 9 hold low ultralow sulfur diesel.

During monthly leak inspections of the tanks, staff perform visual checks, looking for black residue near the vents, as well as check for odors. Staff could not recall any instance of vent leaks that were identified during these inspections.

At the loading rack, the end of each filling hose is equipped with a loading arm that is intended to create a drip-free connection with the tanker truck during filling.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

EPA observed and recorded several videos indicating hydrocarbon emissions from vents located at the tops of three internal floating roof tanks as well as from a connection between a loading arm and a truck during filling, using a Forward Looking InfraRed (FLIR) camera. See Digital Image Log. While on the tour, EPA allowed facility staff to view the tank emissions through the FLIR camera, and the staff simultaneously noted the presence of fuel odor.

Photos and/or Videos: were taken during the inspection.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Concerns: EPA informed facility staff that the emissions observed at the three internal floating roof tanks should be investigated.

DIGITAL SIGNATURES

Report Author: **DAVID
SUTLIN**  Digitally signed by DAVID
SUTLIN
Date: 2022.06.07
08:46:01 -05'00'

Section Supervisor: **Brian
Dickens**  Digitally signed by Brian
Dickens
Date: 2022.06.08
12:11:26 -05'00'

Facility Name: Buckeye Terminals, LLC – Flint Terminal
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APPENDICES AND ATTACHMENTS

Appendix A: Digital Image Log

Facility Name: Buckeye Terminals, LLC – Flint Terminal
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APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: David Sutlin	2. Archival Record Location: R5 Electronic Records Center
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Image Number	File Name	Date and Time (Eastern Time)	Description of Image
1	MOV_2652.mp4	4/11/2022 16:00	Emissions from loading arm during truck filling
2	MOV_2654.mp4	4/11/2022 16:12	Emissions from vent of Tank #4
3	MOV_2655.mp4	4/11/2022 16:22	Emissions from vent of Tank #4
4	MOV_2656.mp4	4/11/2022 16:23	Emissions from vent of Tank #4
5	MOV_2657.mp4	4/11/2022 16:24	Emissions from vent of Tank #4
6	MOV_2658.mp4	4/11/2022 16:38	Emissions from vent of Tank #10
7	MOV_2659.mp4	4/11/2022 16:42	Emissions from vent of Tank #10
8	MOV_2660.mp4	4/11/2022 16:44	Emissions from vent of Tank #10
9	MOV_2661.mp4	4/11/2022 16:54	Emissions from vent of Tank #4
10	MOV_2662.mp4	4/11/2022 16:55	Emissions from vent of Tank #1
11	MOV_2663.mp4	4/11/2022 16:58	Emissions from vent of Tank #1
12	IMG_0001.jpg	4/11/2022 15:32	Aerial photo of facility