



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

APR 30 2015

Wilhemina McLemore
Detroit District Supervisor
Michigan Department of Environmental Quality
3058 West Grand Boulevard, Suite 2-300
Detroit, Michigan 48202

Dear Ms. McLemore:

The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit, permit number MI-ROP-B2987-201X, for Buckeye Terminals, LLC – River Rouge Terminal, located in River Rouge, Michigan. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

- 1.) Sourcewide special condition (SC) IX.1 cites 40 C.F.R. § 63.420(c)(1), which exempts the facility from the requirements of 40 C.F.R. Part 63, Subpart R, with the exception of those requirements identified in 40 C.F.R. § 63.420(c)(1). The Staff Report does not discuss the applicability of 40 C.F.R. Part 63, Subpart R. The Staff Report should be revised to include a discussion regarding the applicability of 40 C.F.R. Part 63, Subpart R.
- 2.) EUTANK57, SC VI.2, allows the permittee to record the type and temperature of the stored material in the tank and states that this is equivalent to measuring true vapor pressure. SC VI.2 does not specify the protocol used to calculate the true vapor pressure of the storage tank. Please clarify how the permittee will determine the true vapor pressure of materials stored in the tank. This protocol should be identified within the permit to ensure consistency when demonstrating compliance with the true vapor pressure limit.
- 3.) EULOADRACK, SC III.4(b), requires the permittee to notify the owner or operator of non-vapor-tight gasoline tank trucks loaded at the facility within three weeks after the loading has occurred. SC III.4(b) cites 40 C.F.R. § 60.502(e)(4) as the applicable requirement. However, 40 C.F.R. § 60.502(e)(4) requires the permittee to notify the owner or operator of non-vapor-tight gasoline tank trucks within one week of the documentation cross-check required in SC III.4(c) and 40 C.F.R. § 60.502(e)(3).

Please revise SC III.4(b) to ensure that the requirement is consistent with 40 C.F.R. § 60.502(e)(4).

- 4.) EULOADRACK, SC IV.3 cites 40 C.F.R. § 60.502(h) as the underlying applicable requirement, which requires the gauge pressure of a delivery tank not to exceed 450 mm of water during loading when measured using the procedures specified in 40 C.F.R. § 60.503(d). However, the procedures identified in 40 C.F.R. § 60.503(d) are not cited or included in the permit. Please ensure that the procedure used to determine the gauge pressure of a delivery tank is identified in the permit.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,


Genevieve Damico
Chief
Air Permits Section