

# CITY OF TOLEDO



## DEPARTMENT OF PUBLIC UTILITIES

August 14, 2012

### CERTIFIED MAIL

Mr. Rich Raiders  
Air Compliance Manager  
Buckeye Terminals, LLC  
9999 Hamilton Boulevard  
Breinigsville, PA 18031

Re: Site visit at Buckeye Terminals – Toledo Station (NORCO)  
Ohio EPA Facility ID 0448010984

Dear Mr. Raiders:

I want to thank Mr. Michael Boyer for his time spent with me during my visit at the Buckeye Terminals - Toledo Station (NORCO) facility. During my records review at the facility, it appears that the Toledo Facility did not have access to some of the records that are generated by Buckeye Terminals' corporate environmental staff. During my site visit, Michael and I spoke to Mr. Nicholas Frosini of your office regarding some of the recordkeeping requirements contained in the air permit for the Toledo Station (NORCO) facility issued 6/19/2012. During my conversation with Mr. Frosini, it was indicated that the Buckeye Terminals corporate environmental staff have been in the process of implementing a new electronic compliance recordkeeping system, and it sounds like that may be the reason why the records were not immediately available onsite.

I informed Mr. Frosini of the records that I wanted to see, and he indicated that he would email them to me. I just wanted to formalize my request for information in writing and to also provide suggestions to make it simpler for Buckeye Terminals to document compliance with the air permit requirements in the new electronic recordkeeping system. I am requesting for a copy of the following records to be sent to me for each month from July 2011 to July 2012 that are required to be maintained onsite by Permit to Install and Operate (PTIO) P0109435 issued June 19, 2012, but were not immediately available during my site visit today: throughput and emission records required by Section B.5.

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Timothy D. Murphy, Commissioner  
DIVISION OF ENVIRONMENTAL SERVICES  
Quilter Environmental Center  
348 South Erie Street, Toledo, Ohio 43604-8633 USA  
Telephone: 419-936-3015 Fax: 419-936-3959 E-mail: [tim.murphy@toledo.oh.gov](mailto:tim.murphy@toledo.oh.gov)

The following are suggestions for including in the electronic recordkeeping system (if not already in the system) to simplify auditing of the Toledo Station (NORCO) facility. The Section numbers referred to below are the references to terms and conditions contained in PTIO P0109435.

1. Facility-wide records required by Section B.5.
2. Record of maximum true vapor pressure of the material(s) stored as required by Sections C.1.d)(1), C.2.d)(1), and C.3.d)(1)

Please submit a copy of the throughput and emission records required by Section B.5. of PTIO P0109435 to me within 7 days of receipt of this letter. The documents can be sent to me by email at [matthew.stanfield@toledo.oh.gov](mailto:matthew.stanfield@toledo.oh.gov) or sent by hardcopy to me at the below address. Please contact me at 419-936-3938 or by email with any questions

Sincerely,



Matthew A. Stanfield  
Staff Professional Engineer

cc: Karen Granata  
Tim Murphy  
Joyce Anagnos  
John Paulian, Ohio EPA  
William MacDowell U.S. EPA Region 5  
Michael Boyer, Buckeye Partners, L.P. (via email)  
Nicholas Frosini, Buckeye Terminals, LLC (via email)