



**Environmental
Protection Agency**

John R. Kasich, **Governor**
Mary Taylor, **Lt. Governor**
Scott J. Nally, **Director**

September 18, 2012

CERTIFIED MAIL

Mr. Nick Frosini, HSE Specialist
Buckeye Terminals LLC
469 Moon Clinton Road
Coraopolis, Pennsylvania 15108

Re: NOTICE OF VIOLATION – GC7
Facility ID: 0302020034
Buckeye Terminals LLC
Location: 1500 West Buckeye Road
Lima, OH 45804
Allen County

Dear Mr. Frosini:

This letter shall serve as a follow-up to the inspection conducted on September 5, 2012, of the above referenced facility by Jeffrey Skebba and Andrea Moore of the Division of Air Pollution Control/Northwest District Office (DAPC/NWDO). The purpose of this inspection was to determine the compliance status of all air contaminant emissions units located there.

Based on discussions and observations during the inspection, along with a review of the company's files, my findings are as follows:

1. The facility's Title V permit requires volatile organic compound (VOC) stack testing twice during the current five-year period for the vapor recovery unit for loading rack emissions unit J001. The first test was completed on October 22, 2008, within the required time frame. However, the second test was required no later than August 31, 2012. This test has not been completed, and is a violation of Title V permit term Part III, A.V.1.a for emissions unit J001 and ORC 3704.05.

After discussing this violation with our Central Office, we are requiring the company to complete this testing by October 31, 2012. Please contact Jay Liebrecht, stack testing coordinator at DAPC/NWDO at 419-373-3136 or e-mail jay.liebrecht@epa.state.oh.us to schedule a test date. We will waive the normal 30-day intent to test notification requirement to expedite testing. Thus, please submit an intent to test notification at least 14 days prior to the test date. Further instructions were provided in an e-mail sent to your attention on September 13, 2012.

2. The second quarter and first half 2012 Title V deviation reports were due by July 31, 2012, in Air Services. These reports were received late on August 30, 2012, which is a violation of Title V permit terms - Part I, General Terms and Conditions A.1.c.ii and A.1.c.iii.

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Corrective action through submittal of the required reports was completed on August 30, 2012, and no deviations occurred for emissions limitations, operational restrictions, control device operating parameter limitations or other federally enforceable permit requirements. Thus, the reporting requirement violation has been resolved.

3. Daily operating records and annual maintenance records for the vapor recovery unit were reviewed and found to be in compliance with monitoring and record keeping requirements in the Title V permit.
4. Reformulated gasoline was not stored during 2011 or 2012 year to date. Thus, no records were required to be reviewed for reformulated gasoline throughput, which is limited in Title V permit term, Part II – A.1.b.
5. Storage tank emissions unit T016 was operating in compliance with inspection requirements for 40 CFR, Part 60, Subpart Kb.

With the exceptions noted in item Nos. 1 and 2 above, all emissions units appear to be in compliance with air pollution control regulations of the Ohio EPA at this time. Please submit the written intent to test notification for the vapor recovery unit stack test at least 14 days prior to the test date.

Please be advised that submission of information to respond to this letter does not constitute a waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC Section 3704.06. The Ohio EPA will make a decision whether to pursue such penalties regarding this matter a later date. If you have any questions, please contact me at 419-373-3128 or E-mail jeffrey.skebba@epa.state.oh.us.

Sincerely,



Jeffrey Skebba
Division of Air Pollution Control

/llr

pc: Bruce Weinberg, Central Office, Ohio EPA
John Paulian, Central Office, Ohio EPA
William MacDowell, Region 5, U.S. EPA
Certified Mail Receipt Number 7011 3500 0000 8204 2616

ec: Jennifer Jolliff, DAPC-NWDO
Jeffrey Skebba, DAPC-NWDO