

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION**

EFFECTIVE DATE: October 22, 2019

ISSUED TO

MPLX Terminals LLC - Niles Terminal

State Registration Number (SRN): B9073

LOCATED AT

2216 South Third Street, Niles, Berrien County, Michigan 49120

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B9073-2019

Expiration Date: October 22, 2024

Administratively Complete ROP Renewal Application Due Between April 22, 2023 and April 22, 2024

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Rule 210(1) of the administrative rules promulgated under Act 451, this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-B9073-2019

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(1) of Act 451. Pursuant to Rule 214a of the administrative rules promulgated under Act 451, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environment, Great Lakes, and Energy

Rex Lane, Kalamazoo District Supervisor

(Rev. 02/04/19)

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AUTHORITY AND ENFORCEABILITY

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Environment, Great Lakes, and Energy (EGLE) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a Source-Wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements are identified for each ROP term or condition. All terms and conditions that are included in a PTI are streamlined, subsumed and/or is state-only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**
- Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R 336.1214a(5))**
- Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as “state-only” are not enforceable by the USEPA or citizens pursuant to the CAA. **(R 336.1213(1)(a))**
2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. **(R 336.1213(1)(b))**
3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee’s own risk, pursuant to Rule 215 and Rule 216. **(R 336.1213(1)(c))**
4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities: **(R 336.1213(1)(d))**
 - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
 - c. Inspect, at reasonable times, any of the following:
 - i. Any stationary source.
 - ii. Any emission unit.
 - iii. Any equipment, including monitoring and air pollution control equipment.
 - iv. Any work practices or operations regulated or required under the ROP.
 - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**
7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**
8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

Equipment & Design

9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2).² **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

11. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in Subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following:"² **(R 336.1301(1))**
 - a. A 6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27% opacity.
 - b. A limit specified by an applicable federal new source performance standard.

The grading of visible emissions shall be determined in accordance with Rule 303.

12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
 - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.¹ **(R 336.1901(a))**
 - b. Unreasonable interference with the comfortable enjoyment of life and property.¹ **(R 336.1901(b))**

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).² **(R 336.2001)**
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(5))**

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate. **(R 336.1213(3)(b))**
 - a. The date, location, time, and method of sampling or measurements.
 - b. The dates the analyses of the samples were performed.
 - c. The company or entity that performed the analyses of the samples.
 - d. The analytical techniques or methods used.
 - e. The results of the analyses.
 - f. The related process operating conditions or parameters that existed at the time of sampling or measurement.
17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604-3507. **(R 336.1213(4)(c))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
 - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following: **(R 336.1213(3)(c))**
 - a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
 - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that; “based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete.” The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.² **(R 336.1912)**

Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
 - a. The applicable requirements are included and are specifically identified in the ROP.
 - b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.

Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.

27. Nothing in this ROP shall alter or affect any of the following:
 - a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
 - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
 - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

- d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**
28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
 - a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
 - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
 - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
 - d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
 - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**
31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**
32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(10))**
33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

Reopenings

34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
 - a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. **(R 336.1217(2)(a)(i))**
 - b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. **(R 336.1217(2)(a)(ii))**
 - c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. **(R 336.1217(2)(a)(iii))**
 - d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. **(R 336.1217(2)(a)(iv))**

Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(9))**

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.
37. If the permittee is subject to 40 CFR Part 82 and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 68.10(a):
- June 21, 1999,
 - Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
 - The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR Part 68)**

Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. **(R 336.1213(12))**

Permit to Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² **(R 336.1201(1))**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² **(R 336.1201(8), Section 5510 of Act 451)**
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ.² **(R 336.1219)**
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, EGLE, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² **(R 336.1201(4))**

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

B. SOURCE-WIDE CONDITIONS

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.

SOURCE-WIDE CONDITIONS

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Total Hazardous Air Pollutants (HAPs)	24.9 tons	12 month rolling time period as determined at the end of each calendar month	Sourcewide	SC VI.1	R 336.1213(2)
2. Single HAP	9.9 tons	12 month rolling time period as determined at the end of each calendar month	Sourcewide	SC VI.1	R 336.1213(2)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

- The permittee shall calculate and record the stationary source-wide (North and South Terminals combined) emissions rates, in tons, for each single HAP and total combined HAPs for each calendar month and each 12-month rolling time period, as determined at the end of each calendar month. **(R 336.1213(3))**

VII. REPORTING

- Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

C. EMISSION UNIT SPECIAL CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EURACK-SOUTH	Loading rack for South Terminal with carbon absorption system for primary control device and a portable combustor unit as the backup control device.	01-01-61/ 12-31-82/ 10-24-00	FGLOADRACKS FGMACT-BBBBBB
EURACK-NORTH	Loading rack for North Terminal with carbon absorption system for primary control device and a portable combustor unit as the backup control device.	01-01-71/ 12-31-82	FGLOADRACKS FGMACT-BBBBBB
EUVCU-PORT	Portable vapor combustor (either a RANE or John Zink) used as the backup control system for the loading racks.	06-01-91/ 06-01-00	FGLOADRACKS FGMACT-BBBBBB
EUTK20-13	17,677 barrel (742,434 gal) capacity above ground cone roof storage tank for fuel oil at North Terminal.	01-01-71/NA	FGTANKFARM
EUTK25-3	19,965 barrel (838,539 gal) capacity above ground storage tank, changed from an external to internal floating roof (geodome) in 2000 at South Terminal.	01-01-71/ 10-03-00	FGTANKFARM FGFRTANKS FGMACT-BBBBBB
EUTK31-11	28,716 barrel (1,206,072 gal) capacity above ground fixed roof storage tank with internal floating roof at North Terminal.	01-01-71/NA	FGTANKFARM FGFRTANKS FGMACT-BBBBBB
EUTK35-4	29,255 barrel (1,228,710 gal) capacity above ground cone roof storage tank for jet kerosene and fuel oil at South Terminal.	01-01-61/NA	FGTANKFARM
EUTK55-2	46,370 barrel (1,947,540 gal) capacity above ground fixed roof storage tank with internal floating roof at South Terminal.	01-01-61/NA	FGTANKFARM FGFRTANKS FGMACT-BBBBBB
EUTK55-5	47,124 barrel (1,979,208 gal) capacity above ground storage tank, changed from an external to internal floating roof (geodome) in 2003 at South Terminal.	01-01-61/ 08-01-03	FGTANKFARM FGFRTANKS FGMACT-BBBBBB
EUTK55-6	45,640 barrel (1,916,880 gal) capacity above ground fixed roof storage tank with suspended internal floating roof at South Terminal.	01-01-71/ 11-11-13	FGTANKFARM FGFRTANKS FGMACT-BBBBBB
EUTK55-7	44,020 barrel (1,848,840 gal) capacity above ground fixed roof storage tank with internal floating roof at South Terminal.	01-01-66/NA	FGTANKFARM FGFRTANKS FGMACT-BBBBBB

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUTK64-9	56,146 barrel (2,358,132 gal) capacity above ground fixed roof storage tank with internal floating roof at North Terminal.	01-01-71/NA	FGTANKFARM FGFRTANKS FGMACT-BBBBBB
EUTK67-12	59,270 barrel (2,489,340 gal) capacity above ground cone roof storage tank changed to an internal floating roof in 2016 at North Terminal.	01-01-71/ 09-01-16	FGTANKFARM FGMACT-BBBBBB
EUTK80-8	72,390 barrel (3,040,380 gal) capacity above ground cone roof storage tank at South Terminal.	01-01-77/NA	FGTANKFARM FGFRTANKS FGMACT-BBBBBB
EUTK100-10	88,858 barrel (3,732,036 gal) capacity above ground fixed roof storage tank with internal floating roof at North Terminal.	01-01-71/NA	FGTANKFARM FGFRTANKS FGMACT-BBBBBB
EUTKT-1	1,198 barrel (50,316 gal) capacity above ground fixed roof transmix tank with internal floating roof at South Terminal.	01-01-61/NA	FGTANKFARM FGFRTANKS

EUTK80-8
EMISSION UNIT CONDITIONS

DESCRIPTION

72,390 barrel (3,040,380 gal) capacity above ground cone roof storage tank at South Terminal.

Flexible Group ID: FGTANKFARM, FGFRTANKS, FGMACT-BBBBBB

POLLUTION CONTROL EQUIPMENT

Fixed cone roof

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. If the true vapor pressure of the petroleum liquid being stored is equal to or greater than 1.5 psia, but not greater than 11.1 psia, EUTK80-8 shall be equipped with an internal floating roof, a vapor recovery system or their equivalent. **(40 CFR 60.112(a)(1))**
2. If the true vapor pressure of the petroleum liquid being stored is greater than 11.1 psia, EUTK80-8 shall be equipped with a vapor recovery system or its equivalent. **(40 CFR 60.112(a)(2))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall maintain a record of each petroleum liquid stored, the period stored, and the maximum true vapor pressure of that liquid during the respective storage period. **(40 CFR 60.113(a))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year.
(R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. EUTK80-8 shall comply with all applicable provisions set forth in 40 CFR Part 60 Subparts A and K.
(R 336.1213(3))

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

D. FLEXIBLE GROUP SPECIAL CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGLOADRACKS	Loading racks at the North and South Terminals, and the portable combustor that is the backup control.	EURACK-SOUTH EURACK-NORTH EUVCU-PORT
FGTANKFARM	All tanks at the Facility that have applicable requirements.	EUTK20-13 EUTK25-3 EUTK31-11 EUTK35-4 EUTK55-2 EUTK55-5 EUTK55-6 EUTK55-7 EUTK64-9 EUTK67-12 EUTK80-8 EUTK100-10 EUTKT-1
FGFRTANKS	All tanks at the Facility that have a fixed roof and are subject to R 336.1604.	EUTK25-3 EUTK31-11 EUTK55-2 EUTK55-5 EUTK55-6 EUTK55-7 EUTK64-9 EUTK80-8 EUTK100-10 EUTKT-1
FGMACT-BBBBBB	All equipment that is subject to 40 CFR, Part 63, Subpart BBBBBB.	EURACK-SOUTH EURACK-NORTH EUVCU-PORT EUTK25-3 EUTK31-11 EUTK55-2 EUTK55-5 EUTK55-6 EUTK55-7 EUTK64-9 EUTK67-12 EUTK80-8 EUTK100-10

**FGLOADRACKS
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Loading racks at the North and South Terminals, and the portable combustor that is the backup control.

Emission Unit: EURACK-SOUTH, EURACK-NORTH, EUVCU-PORT

POLLUTION CONTROL EQUIPMENT

Primary vapor control system (VCS) - carbon adsorption. Secondary VCS - John Zink or RANE portable vapor combustor (EUVCU-PORT).

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	35 mg*	per liter of organic compounds loaded, averaged over six hours during which at least 300,000 liters of gasoline are loaded.	EURACK-SOUTH With primary VCS in use	SC III.1.a through g, SC V.3, and SC VI.1	R 336.1213(2) 40 CFR 63.11088(a)
2. VOC	80 mg ^{2**}	per liter of organic compounds loaded, averaged over six hours during which at least 300,000 liters of gasoline are loaded.	EURACK-NORTH With primary VCS in use	SC III.1.a through g, SC V.2, and SC VI.1	R 336.1706(2) 40 CFR 63.11088(a)
3. VOC	35 mg ^{2*}	per liter of organic compounds loaded, averaged over six hours during which at least 300,000 liters of gasoline are loaded.	EURACK-SOUTH or EURACK-NORTH With secondary VCS	SC VI.5	R 336.1702(b) 40 CFR 63.11088(a)
4. Opacity	0% ²	6 minutes	EUVCU-PORT	SC VI.5	40CFR 64.6(c)(1)), 40 CFR Part 63 Subpart BBBBB

* Equivalent to 0.3 pounds per 1,000 gallons of organic compounds loaded.

** Equivalent to 0.7 pounds per 1,000 gallons of organic compounds loaded.

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. CONTROL SYSTEM:

- a. To ensure proper operation of the Primary VCS and compliance with R 336.1702(b), the average maximum vacuum level of each regeneration cycle shall be equal to or greater than 26 inches of Hg over a 6-hour

period during active gasoline loading and the carbon beds shall be regenerated at least once every 15 minutes, except for periods of maintenance. **(R 336.1213(2), 40 CFR 64.6(c)(3), 40 CFR 64.7(a), 40 CFR 64.7(c)(1))**

- b. If proper regeneration of a carbon bed does not occur at least once every 15 minutes during active loading, except for periods of maintenance, and if the average maximum vacuum specified in condition III.1.a above is not achieved, the permittee shall immediately cease loading of gasoline at that rack until proper regeneration of the carbon bed is restored or until the Secondary VCS is brought on-line. **(R 336.1213(2))**
- c. The permittee shall not load gasoline at the loading racks unless either the Primary or Secondary VCSs are installed and operating properly.² **(R 336.1702(a), R 336.1910, 40 CFR 63.11088(a))**
- d. The permittee shall operate EUVCU-PORT as recommended by the manufacturer. **(R 336.1213(2))**
- e. The permittee shall only use propane or natural gas for maintaining a flame in EUVCU-PORT. **(R 336.1213(2))**
- f. The permittee shall maintain and operate the pressure monitoring system and associated equipment according to the manufacturer's recommendations. **(40 CFR 64.7(b))**
- g. As specified in R 336.1627(9), the Primary VCS shall be operated to prevent gauge pressure in the delivery vessel from exceeding 0.6 pounds per square inch and to prevent vacuum from exceeding - 0.2 pounds per square inch gauge. **(R 336.1702(d))**

2. GASOLINE TANK TRUCK LOADING/UNLOADING:

- a. As specified in R 336.1627, the permittee shall not operate the loading racks unless the following provisions are met: **(R 336.1702(d))**
 - i. As specified in R 336.1627(5), there shall be no visible liquid leaks from the gasoline tank truck or vapor collection system, except when the disconnection of dry breaks in liquid lines produces a few drops of liquid. **(R 336.1702(d))**
 - ii. As specified in R 336.1627(7), there shall be no gas detector reading greater than or equal to 100% of the lower explosive limit at a distance of one inch from the location of the potential leak in the vapor recovery unit. Leaks shall be detected by a combustible gas detector using the test procedures described in R 336.2005, as described in V.1. **(R 336.1702(d), 40 CFR 64.6(c)(2))**
 - iii. As specified in R 336.1627(8), there shall be no visible leaks, except from the disconnection of bottom loading dry breaks and from raising top loading vapor heads, where a few drops are permitted. **(R 336.1702(d))**
- b. The permittee shall act to ensure that the terminal loading rack and the tank truck vapor control systems are connected during loading of a gasoline tank truck at the affected facility. **(R 336.1213(2))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. Carbon adsorption shall be the Primary VCS for the loading racks. **(R 336.1702(b))**
- 2. The permittee shall only use EUVCU-PORT to control emissions from the loading racks during maintenance or malfunction of the primary VCS. This includes maintenance or malfunction of the receiving tank for gasoline recovered by the primary VCS.² **(R 336.1201(3))**
- 3. The loading racks shall utilize submerged fill pipes for transferring liquids from stationary vessels into delivery vessels. **(R 336.1706(1))**
- 4. Each delivery vessel loaded with organic compounds having a true vapor pressure of more than 1.5 psia, other than crude oil or condensate oil, shall be equipped, maintained, or controlled with all of the following: **(R 336.1706(3))**
 - a. An interlocking system or procedure to ensure that the vapor-tight collection line is connected before any organic compound can be loaded. **(R 336.1706(3)(a))**
 - b. A device to ensure that the vapor-tight collection line shall close upon disconnection so to prevent the release of organic vapor. **(R 336.1706(3)(b))**
 - c. A device to accomplish complete drainage before the loading device is disconnected or a device to prevent liquid drainage from the loading device when not in use. **(R 336.1706(3)(c))**
 - d. Pressure-vacuum relief valves that are vapor-tight and set to prevent the emission of displaced organic vapor during the loading of the delivery vessel, except under emergency conditions. **(R 336.1706(3)(d))**

- e. Hatch openings that are kept closed and vapor-tight during the loading of the delivery vessel. **(R 336.1706(3)(e))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall test for vapor leaks in the vapor control system as described in R 336.1627(6) using the methods described in R 336.2005 at least once each calendar quarter. The results of each leak test shall be maintained on file. **(R 336.1213(3), 40 CFR 64.6(c)(1))**
2. If the permittee commences to load gasoline products again through EURACK-NORTH instead of just distillates, then the permittee shall conduct emissions testing on the Primary VCS at EURACK-NORTH for VOCs and control efficiency in accordance with 40 CFR Subpart XX using EPA Methods 2A, 21, and 25B within 6 months of that date: **(R 336.1213(3))**
 - c. The permittee shall submit a complete test protocol to the AQD for approval at least 30 days prior to the anticipated test date. **(R 336.1213(3))**
 - d. The permittee shall notify the District Supervisor or the Technical Programs Unit no less than 7 days prior to the anticipated test date. **(R 336.12001(3))**
 - e. The permittee shall submit a complete test report of the test results to the District Supervisor or the Technical Programs Unit within 60 days following the last date of the test. **(R 336.12001(4))**
3. The permittee shall conduct emissions testing on the Primary VCS at EURACK-SOUTH for VOCs and control efficiency in accordance with 40 CFR 60 Subpart XX using EPA Methods 2A, 21, and 25B. The test shall be performed once within the effective dates of the permit. **(R 336.1213(3))**
 - a. The permittee shall submit a complete test protocol to the AQD for approval at least 30 days prior to the anticipated test date. **(R 336.1213(3))**
 - b. The permittee shall notify the District Supervisor or the Compliance Support Unit no less than 7 days prior to the anticipated test date. **(R 336.12001(3))**
 - c. The permittee shall submit a complete test report of the test results to the District Supervisor or the Compliance Support Unit within 60 days following the last date of the test. **(R 336.12001(4))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. For each scheduled work day that the Primary VCS is in use the permittee shall monitor the carbon bed pressure using an electronic recording device (or equivalent data recording device approved by the District Supervisor) and record any deviations in static pressure or regeneration frequency. An excursion occurs when the maximum vacuum level of each regeneration cycle does not average a minimum of 26 inches of Hg over a 6-hour period during gasoline loading and/or unloading operations and the load rack is not immediately shutdown. **(R 336.1213(3), 40 CFR 64.6(c)(1))**
2. The permittee shall keep a record consisting of the date, time, and duration of each malfunction of each Primary VCS or scheduled maintenance of each Primary VCS (or the receiving tank for gasoline recovered from the primary VCS), which results in Primary VCS downtime. **(R 336.1213(3))**
3. The permittee shall maintain a written record of the dates and hours of operation of EUVCU-PORT and on which loading rack the unit is used.² **(R 336.1201(3))**
4. The permittee shall maintain a written record of all replacements, maintenance, repairs, and/or additions made to the VCSs. **(R 336.1213(3))**
5. The permittee shall use a thermocouple or other device to continuously monitor for the presence of a pilot flame at all times that the Secondary VCS is in use. An excursion shall be defined as the absence of the pilot flame during gasoline loading and/or unloading operations and the load rack is not immediately shutdown. **(40 CFR 64.6(c)(1), 40 CFR Part 63 Subpart BBBBBB)**
6. A copy of the inspection and maintenance plan for the Primary VCS shall be kept on-site and made available to the AQD staff upon request. **(R 336.1213(3))**

7. Upon detecting an excursion or exceedance, the permittee shall restore operation of EU-RACK-SOUTH or EURACK-NORTH to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). **(40 CFR 64.7(d))**
8. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 64.7(c))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall submit any performance test reports, including any RATA Reports, to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**
5. The report required in VII.2 above shall include:
 - a. Summary information on the number, duration, and cause (including unknown cause, if applicable) of exceedances and excursions and the corrective actions taken;
 - b. Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitor downtime incidents (other than for calibration checks);
 - c. A description of the actions taken to implement a Quality Improvement Plan (QIP) during the reporting period, if applicable. If a QIP has been completed the report shall include documentation that the plan has been implemented and reduced the likelihood of similar levels of excursions or exceedances occurring. **(40 CFR 64.9)**
6. The permittee shall submit a QIP for EURACK-NORTH or EURACK-SOUTH if an excursion occurs six times in a 6 month reporting period. An excursion is when the maximum vacuum level of each regeneration cycle does not average a minimum of 26 inches of Hg over a 6-hour period during gasoline loading and/or unloading operations and the load rack is not immediately shutdown. The permittee shall submit a QIP for EUVCU-PORT if an excursion occurs four times in a 6 month reporting period which is if the flame is not present during gasoline loading and/or unloading and the load rack is not immediately shutdown. **(R 336.1213(3), 40 CFR 64.8(a))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-VRU-SOUTH*	12	16.7	R 336.1702(a), R 336.1910
2. SV-VRU-NORTH*	6	13.8	R 336.1702(a), R 336.1910
3. SV-VCU-PORT (RANE)	72	13	R 336.1702(a), R 336.1910
4. SV-VCU-PORT (ZINK)	30	25	R 336.1702(a), R 336.1910

*Stacks SV-VRU-SOUTH and SV-VRU-NORTH vent horizontally.

IX. OTHER REQUIREMENT(S)

- The permittee shall, at all times, maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. **(40 CFR 64.7(b))**
- If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. **(40 CFR 64.7(e))**
- The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR 64.7(c)(3))**
- The permittee shall comply with all applicable provisions of R 336.1627 and R 336.1706.² **(R 336.1201(3))**
- The permittee shall maintain written procedures for proper operation of the Primary and Secondary VCSs and the terminal loading racks. These written procedures shall be accessible at the terminal upon AQD request. **(R 336.1706(4))**
- The permittee shall certify that each gasoline tank truck utilized at the affected facility is equipped with vapor collection equipment that is compatible with the terminal's vapor control system and that each gasoline tank truck is certified as specified in R 336.1627(2). **(R 336.1213(2))**
- As specified in R 336.1627(10), the department may require the owner or operator of any vapor collection system subject to the provisions of subrule (6) of this rule to test the system in accordance with R 336.2005. The tests shall be conducted within 60 days following receipt of written notification from the department. Notification of the exact time and location of the test shall be given to the department, in writing, not less than 7 days before the actual test date. Documentation of the test that states the date and location of the test, test procedures, the type of equipment used, and the results of the test shall be submitted to the department within 60 days following the last date of the test. If the time or location of the test changes for any reason, then the owner or operator shall notify the department as soon as practicable. **(R 336.1702(d))**
- As specified in R 336.1627(11), the permittee shall certify that any delivery vessel or component of a vapor collection system that fails to meet any provisions of R 336.1627 shall not be operated until the necessary repairs have been made, the vessel or vapor recovery unit retested, and the test results have been submitted to the AQD. **(R 336.1702(d))**

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**FGTANKFARM
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

All tanks at the Facility that have applicable requirements.

Emission Units: EUTK20-13, EUTK25-3, EUTK31-11, EUTK35-4, EUTK55-2, EUTK55-5, EUTK55-6, EUTK55-7, EUTK64-9, EUTK67-12, EUTK80-8, EUTK100-10, EUTKT-1

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	53.11 tons ²	12 month rolling time period as determined at the end of each calendar month	FGTANKFARM	SC VI.2	R 336.1702(a)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Gasoline	580 million gallons ²	12 month rolling time period as determined at the end of each calendar month	FGTANKFARM	SC VI.4	R 336.1702(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall calculate and record the total VOC emission rate, in tons emitted, from FGTANKFARM for each calendar month. (R 336.1213(3))
2. The permittee shall calculate and record the 12-month rolling average VOC emissions rate, in tons emitted, from FGTANKFARM, as determined at the end of each calendar month. (R 336.1213(3))

3. The permittee shall monitor and record the total gasoline throughput, in gallons, for the stationary source (South Terminal and North Terminal combined) for each calendar month. **(R 336.1213(3))**
4. The permittee shall monitor and record the 12-month rolling time period gasoline throughput, in gallons, for the stationary source (South Terminal and North Terminal combined), as determined at the end of each calendar month.² **(R 336.1201(3))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 63, Subpart BBBBBB, as they apply to FGTANKFARM.² **(40 CFR Part 63, Subpart BBBBBB)**

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGFRTANKS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

All tanks at the Facility that have a fixed roof and are subject to R 336.1604.

Emission Unit: EUTK25-3, EUTK31-11, EUTK55-2, EUTK55-5, EUTK55-6, EUTK55-7, EUTK64-9, EUTK80-8, EUTK100-10, EUTKT-1

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not store any organic compound having a true vapor pressure of more than 1.5 psia, at actual storage conditions, in any storage tanks in FGFRTANKS unless the provisions of R 336.1604 are complied with.² **(R 336.1702(d))**
2. As specified in R 336.1604(1), when storing any organic compound having a true vapor pressure of more than 1.5 psia but less than 11 psia, at actual storage conditions, in any storage tank in FGFRTANKS one of the following conditions must be met:
 - a. As specified in R 336.1604(1)(a) each subject vessel shall be capable of maintaining working pressures sufficient to prevent organic vapor or gas loss to the atmosphere at all times, except under emergency conditions.

OR
 - b. As specified in R 336.1604(1)(b), each subject vessel shall be 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 the vessel wall. The seal or any seal fabric shall have no visible holes, tears, or other nonfunctional openings.

OR
 - c. As specified in R 336.1604(1)(c), each subject vessel shall be equipped and maintained with a vapor recovery system, or other control system approved by the AQD, which recovers not less than 90% by weight of the uncontrolled organic vapor that would otherwise be emitted into the atmosphere.

(R 336.1702(d))
3. When storing any organic compound having a true vapor pressure of more than 1.5 psia but less than 11 psia, at actual storage conditions, all openings, except stub drains, shall be equipped with covers, lids, or seals that meet the following requirements:

- a. As specified in R 336.1604(2)(a), the cover, lid, or seal is in the closed position at all times, except when in actual use. **(R 336.1702(d))**
- b. As specified in R 336.1604(2)(b), automatic bleeder vents are closed at all times, except when the roof is floated off, or landed on, the roof leg supports. **(R 336.1702(d))**
- c. As specified in R 336.1604(2)(c), 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. **(R 336.1702(d))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall maintain a written record of the true vapor pressure, at actual storage conditions, of each fuel, dye, additive, or other substance stored in each vessel. **(R 336.1213(3))**
2. When storing any organic compound having a true vapor pressure of more than 1.5 psia, but less than 11 psia, at actual storage conditions, the permittee shall perform a semiannual routine inspection of each vessel to ensure compliance with R 336.1604(1) and R 336.1604(2) as required by R 336.1702(d). The permittee shall keep a record of the results of this semiannual inspection. **(R 336.1213(3))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. Pursuant to R 336.1702(d) the permittee shall comply with all applicable provisions of R 336.1604. **(R 336.1213(2))**

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGBBBBBB
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

All equipment that is subject to 40 CFR, Part 63, Subpart BBBBBB.

Emission Units: EURACK-SOUTH, EURACK-NORTH, EUVCU-PORT, EUTK25-3, EUTK31-11, EUTK55-2, EUTK55-5, EUTK55-6, EUTK55-7, EUTK64-9, EUTK67-12, EUTK80-8, EUTK100-10

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Loading of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the procedures specified in 40 CFR 60.502(e)-(j). **(40 CFR 63.11088(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. No pressure-vacuum vent in the Primary VCS shall begin to open at a system pressure less than 4,500 pascals (18 inches of water). **(40 CFR 63.11088(a))**
2. Each gasoline storage tank shall meet the applicable emission limit and management practices specified in Table 1 of Subpart BBBBBB. **(40 CFR 63.11087(a))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall perform a monthly leak inspection of all equipment in gasoline services. For this inspection, detection methods incorporating sight, sound, and smell are acceptable: **(40 CFR 63.11089)**
 - a. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak, except as provided in Condition V.1.b. **(40 CFR 63.11089)**
 - b. Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The owner or operator shall provide in the semiannual report the reasons why the repair was not feasible and the date each repair was completed. **(40 CFR 63.11089)**
2. For the monthly leak inspection required under Condition VI.1, a log book shall be used and shall be signed by the permittee at the completion of each inspection. A section of the log book shall contain a list, summary

description, or diagram(s) showing the location of all equipment in gasoline service at the facility. Each detection of a leak or vapor leak shall be recorded in the log book. **(40 CFR 63.11089)**

3. The permittee shall install, calibrate, certify, operate, and maintain, according to the manufacturer's specifications, a continuous monitoring system (CMS) while gasoline vapors are displaced to the VCS, as specified in 40 CFR 63.11092(b). **(40 CFR 63.11092(b))**
4. The permittee shall keep records of the results of annual certification testing for each gasoline cargo tank loading at FGLOADRACKS, keeping the documentation specified in 40 CFR 63.11094(b), except as noted below: **(40 CFR 63.11094(b))**
 - a. As an alternative to keeping records at the terminal of each gasoline cargo tank test result, the permittee may either **(40 CFR 63.11094(c))**:
 - i. Make instantly available at the terminal an electronic copy of each record; or
 - ii. Have documentation demonstrating that the terminal operates an automation system that prevents gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading.
5. The permittee shall keep records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. **(40 CFR 63.11094(g)(1))**
6. The permittee shall keep records of actions taken during periods of malfunction to minimize emissions in accordance with Condition IX.1, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. **(40 CFR 63.11094(g)(2))**
7. The permittee shall comply with the applicable testing and monitoring requirements for each gasoline storage tank. **(40 CFR 63.11087(c))**
8. The permittee shall submit applicable notifications for each gasoline storage tank. **(40 CFR 63.11087(d))**
9. The permittee shall keep applicable records and submit applicable reports for each gasoline storage tank. **(40 CFR 63.11087(e))**
10. Each gasoline storage tank subject to, and in compliance with, the control requirements of 40 CFR Part 60, Subpart Kb, will be deemed in compliance with 40 CFR 63.11087. For each storage tank in compliance with the applicable control requirements of 40 CFR Part 60, Subpart Kb, this determination must be included in the Notification of Compliance Status report required under 40 CFR 63.11093(b), **(40 CFR 63.11087(f))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all the applicable provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and BBBBBB (Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities). **(40 CFR 63 Subpart BBBBBB)**

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

APPENDICES

Appendix 1. Acronyms and Abbreviations

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
Department/ department	Michigan Department of Environment, Great Lakes, and Energy	gr	Grains
EGLE	Michigan Department of Environment, Great Lakes, and Energy	HAP	Hazardous Air Pollutant
EU	Emission Unit	Hg	Mercury
FG	Flexible Group	hr	Hour
GACS	Gallons of Applied Coating Solids	HP	Horsepower
GC	General Condition	H ₂ S	Hydrogen Sulfide
GHGs	Greenhouse Gases	kW	Kilowatt
HVLP	High Volume Low Pressure*	lb	Pound
ID	Identification	m	Meter
IRSL	Initial Risk Screening Level	mg	Milligram
ITSL	Initial Threshold Screening Level	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	NMOC	Non-methane Organic Compounds
MAP	Malfunction Abatement Plan	NO _x	Oxides of Nitrogen
MSDS	Material Safety Data Sheet	ng	Nanogram
NA	Not Applicable	PM	Particulate Matter
NAAQS	National Ambient Air Quality Standards	PM10	Particulate Matter equal to or less than 10 microns in diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	%	Percent
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

Appendix 2. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. (R 336.1213(4)(a), R 336.1119(a)(ii))

Appendix 3. Monitoring Requirements

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 4. Recordkeeping

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 5. Testing Procedures

Specific testing requirement plans, procedures, and averaging times are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B9073-2014. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-B9073-2014 is being reissued as Source-Wide PTI No. MI-PTI-B9073-2019.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	201500039/May 5, 2015	Clarification of stack orientations for SV-VRU-NORTH and SV-VRU-SOUTH. These stacks vent horizontally.	FGLOADRACKS
122-16	201600194/March 7, 2017	Incorporate PTI 122-16, which changes the service of Tank ID 67-12 from fuel oil to gasoline and plans to install a cable-suspended internal floating roof in tank EUTK67-12.	EUTK67-12 FGTANKFARM

Appendix 7. Emission Calculations

There are no specific emission calculations to be used for this ROP. Therefore, this appendix is not applicable.

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the EGLE, AQD, Report Certification form (EQP 5736) and EGLE, AQD, Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must

meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

B. Other Reporting

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.