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DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

B292651444

FACILITY: Sunoco Partners Mktng & Terminals LP- River Rouge		SRN / ID: B2926
LOCATION: 500 South Dix Avenue, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Jared Everitt , Environmental Speacialist		ACTIVITY DATE: 11/20/2019
STAFF: Todd Zynda	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: November 20, 2019 Inspection		
RESOLVED COMPLAINTS:		

REASON FOR INSPECTION: Scheduled Inspection  
 INSPECTED BY: Todd Zynda, AQD  
 PERSONNEL PRESENT: Anthony Sobocinski, Terminal Operator  
 FACILITY PHONE NUMBER: 313-843-0243  
 FACILITY FAX NUMBER: 313-475-3500  
 FACILITY WEBSITE: sunocologistics.com

**FACILITY BACKGROUND**

Sunoco Partners Marketing and Terminals, L.P. (Sunoco) River Rouge Terminal is located at 500 South Dix Avenue, Detroit, Michigan. The facility operates a gasoline and distillate storage and loading facility. The facility is surrounded by industrial and commercial business. To the north is the Rouge River and AK Steel; to the southwest is an asphalt facility; to the east and south are industrial and commercial businesses. Residential areas are located approximately 0.3 miles to the southeast, 0.5 miles to the east, and 0.8 miles to the southwest.

The facility operates 24 hours a day, seven days a week, with tanker trucks loading any time during the day. Sunoco currently has three full time employees at the River Rouge Terminal. Current terminal employee hours are 7 AM to 4:30 PM, Monday through Saturday.

Sunoco was previously subject to Title V (Renewable Operating Permit [ROP]) permitting regulations because the potential to emit for volatile organic compounds (VOCs) exceeds 100 tons per year. The facility currently is considered a Title V "opt-out" source, based in the issuance of permit to install 143-18A (issued July 9, 2019), which limits VOC emissions to 95.0 tons. Sunoco is not considered a major source of hazardous air pollutant (HAP) as the potential to emit HAPs does not exceed 10 tons per year for any individual HAP, nor 25 tons per year for all HAPs combined. However, the facility is subject to the area source Maximum Achievable Control Technology (MACT) reporting requirement under 40 Code of Federal Regulations (CFR) Part 63, Subpart BBBBBB (Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities). Sunoco is also subject to the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR Part 60, Subpart Kb) as a modification occurred at EUTANK#42 after the specified date of July 23, 1984.

**PROCESS OVERVIEW**

The facility receives gasoline and distillate through pipelines and loads them into tank trucks using loading racks. The gasoline storage and loading facility requires control equipment. All gasoline is bottom loaded into trucks that are connected to the vapor collection system (VCS) during product loading. Transmix and distillate are loaded in a similar fashion with use of the VCS during all loading. The VCS consists of a vapor recovery unit (VRU) and a vapor combustion unit (VCU). The VRU is a Jordan Vapor Recovery Unit and was installed in 2009 with a design rate of 10 milligram per liter (mg/L) VOC emissions rate. The VCU only operates when the VRU is down for maintenance. Emissions from the VRU are monitored continuously by a continuous emissions monitoring system (CEMS) which records VOC emissions as percent by volume (as propane equivalent).

The below table identifies facility tanks, capacity, and product stored.

TANK	CAPACITY		

ID	(gal)	PRODUCT	Description
38	1,260,000	Gasoline	fixed cone, internal floating roof
39	1,260,000	Gasoline	fixed cone, internal floating roof
42	210,000	Ethanol	fixed cone, internal floating roof
43	630,000	ULSD	vertical fixed roof
44	1,260,000	Gasoline	fixed cone, internal floating roof
49	840,000	ULSD	vertical fixed roof
50	84,000	Transmix	fixed cone, internal floating roof
51	1,050,000	Gasoline	fixed cone, internal floating roof
60	10,000	Gasoline Additive 0717	R336.1284(2)(i) exempt equipment
61	1,000	ULSD Winter Blend Additive 0519 – currently not in use	R336.1284(2)(i) exempt equipment
62	275	REDDYE Additive (BK-50)	R336.1284(2)(i) exempt equipment
63	1,002	Lubricity Additive w/Conductivity	R336.1284(2)(i) exempt equipment
64	990	Shell Gasoline Additive	R336.1284(2)(i) exempt equipment
67	840,000	Gasoline	fixed cone, internal floating roof
68	60,000	Pressurized Bullet - Butane	R336.1284(2)(j) exempt equipment

The facility does not have any operational restrictions based on hours of operation, but is restricted for the amount of gasoline, ethanol, and transmix loaded.

In addition to the loading rack and tank, the facility operates a groundwater remediation system.

### COMPLAINT/COMPLIANCE HISTORY

On October 12, 2017 the facility was inspected and was determined to be in compliance with MI-ROP-B2926-2013.

On October 19, 2015 the facility was inspected and was determined to be in compliance with MI-ROP-B2926-2013.

On March 7, 2014 the facility was issued a violation notice for failure to verify VOC emissions from the vapor collection system within 180 days of issuance of MI-ROP-B2926-2013. This violation was resolved on May 28, 2014 through the verification of VOC emissions from the VRU along with a relative accuracy test audit (RATA) on the VOC CEMS.

During 2010 and 2012, the facility was inspected and was determined to be in compliance with MI-ROP-B2926-2008.

During April 2009, the facility was inspected concurrently with a stack test observation/oversight. At that time the facility was determined to be in compliance with MI-ROP-B2926-2008.

During September 2008, the facility was inspected and was determined to be in compliance with MI-ROP-B2926-2008.

During October 2006, the facility was inspected. A Letter of Violation (LOV) was issued for violating Rule 336.1201(1), "Failure to obtain a permit for installing and operating a 32,000 gallon/day oil/water separator (OWS) on the facility." Sunoco responded in a letter that clarified that the OWS was an exempt device under R 336.285(m) (Permit to Install Exemption Rule).

**OUTSTANDING CONSENT ORDERS**

None

**OUTSTANDING VIOLATION NOTICES**

None

**INSPECTION NARRATIVE**

On November 20, 2019 the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) inspector, Mr. Todd Zynda, conducted an inspection of Sunoco located at 500 Dix Avenue, Detroit, Michigan. During the inspection, Mr. Anthony Sobocinski, Terminal Operator, provided information and tour of facility operations relating to air quality permits. The inspection was conducted to determine the facility's compliance with State and Federal air quality regulations and PTI 143-18A. Sunoco is permitted for the operation of gasoline and distillate storage and loading, along with operation of a groundwater remediation system.

At approximately 1:40 PM, AQD staff arrived onsite and entered the facility. During the opening meeting, the facility operations were discussed. Mr. Sobocinski stated that there have not been any significant modifications to the existing equipment since the last inspection. According to Mr. Sobocinski, tanker trucks can fill up 24 hours a day, with access to loading racks and arms. Tanker trucks can load during times without terminal employees onsite. A computer controlled lockout system prevents the loading of any tank truck which had not been previously registered as certified vapor tight.

An inspection checklist of records requested to demonstrate compliance with PTI 143-18A was provided to the facility. During the opening meeting the items on the inspection checklist were discussed. Records were provided via email on December 3 and 18, 2019, and January 7, 2020.

Following the discussion of operation status, and records review, Mr. Sobocinski provided a tour of the facility. The tour began with observation of storage tanks. There are two primary tank areas at the facility (north and south). Both areas have a sign indicating the tank ID and working capacity of the tank.

During the inspection the loading system was observed. The system is capable of loading gasoline, transmix, or distillate from loading racks. The loading consists of six bays which load the following product.

Loading Rack Bay	Product
1	ULSD
2	ULSD
3	Transmix
4	Gasoline and ULSD
5	Gasoline
6	Gasoline

According to Mr. Sobocinski, prior to tanker loading, the "scully cord" is attached. The scully cord grounds the vehicle and also contains sensors used during loading to monitor the quantities loaded, etc. Following connection of the scully cord, the vapor recovery hose is connected to the tanker. The loading arms (product hose) are then connected to the tanker. Prior to product loading, the driver inputs information into the computer console located at the loading rack. The product is then loaded as appropriate. Written procedures for the operation of all control measures required were posted in accessible, conspicuous locations near the loading devices.

The VRU/VCU was observed during the inspection. During the inspection the VCU was not in operation. The VRU read the following emissions (as VOC percent by volume [propane equivalent]) at approximately 2:30 PM.

Instantaneous – 0.20%  
 1 hour average – 0.09%  
 6 hour average – 0.12%

During the inspection the groundwater remediation treatment building was also observed.

## **APPLICABLE RULES/PERMIT CONDITIONS**

### **PTI 143-18A**

The Special Conditions (SC) are listed as appropriate. For brevity, permit conditions and the language of federal and state rules have been paraphrased.

### **EUDISLOADING**

SC VI. 1. **COMPLIANCE.** Shall verify on a quarterly basis all requirements for true vapor pressure (as defined in R336.1120(i)) of all organic compounds stored, pounds per square inch absolute (psia) at actual storage conditions. The facility maintains records of Reid vapor pressure and true vapor pressure. Records indicate that vapor pressure is verified quarterly.

SC IX. 1 and 2. **COMPLIANCE.** Shall not allow the loading of any organic compound with a true vapor pressure of more than 1.5 psia at actual conditions from any stationary vessel into any delivery vessel. Shall comply with all applicable provisions of R 336.1609. The true vapor pressure for distillate at varying temperatures is less than 1.5 psia. The loading rack used at the facility appears to meet R 336.1609.

### **EU0033 – GROUNDWATER REMEDIATION SYSTEM**

SC I. 1. and 2. **COMPLIANCE.** VOC emission limits of 1.4 tons per year (based 12-month rolling time period) and 0.31 lb per hour are not exceeded. The 2018 Remediation System Report (dated February 14, 2019) indicates annual VOC emissions were 0.025 tons per year. Hourly emissions are estimated to be 0.00573 lb per hour.

SC I. 3. **COMPLIANCE.** Benzene emission limit of 410 lbs per year, based on a 12-month rolling time period is not exceeded. The 2018 Remediation System Report indicates annual benzene emissions were 2.058 pounds per year.

SC I. 4. **COMPLIANCE.** Naphthalene emission limit of 250 lbs per year, based on a 12-month rolling time period is not exceeded. The 2018 Remediation System Report indicates annual naphthalene emissions were 0.088 pounds per year.

SC V.1, VI. 1, 2, and 3. **COMPLIANCE.** Shall keep records of flow rate, total VOC concentration, benzene concentration, and naphthalene concentration of the air stripper influent and effluent water streams. Records are maintained and included in the 2018 submittal. The facility typically reports the 12 month limits on an annual basis only (not 12-month rolling). AQD has accepted this reporting as the emissions are significantly less than emission limits.

SC VII.1. **COMPLIANCE.** The stack requirements for the groundwater treatment system were not measured during the inspection. Based on visual appearance, the stack appears to meet the stack requirements

### **FGG&TLOADING**

SC I. 1, V. 1 and 2. **COMPLIANCE.** VOC emissions shall not exceed 0.167 pounds for every 1,000 gallons of organic compound loaded (20 mg/L). Shall verify the VOC emission rate from the VCS for EUGASLOADING within 180 days of issuance of this permit. Shall conduct a performance test on the pollution control equipment (PCE) in accordance with 40 CFR 60.503 except a reading of 500 ppm shall be used to determine leaks to be repaired. The VCU and VRU stack tests were conducted on September 11 and 12, 2019. The stack test reports for the VCU and VRU were received on October 8, 2019. The measured VOC emissions for the VCU (5.5 mg/L) and VRU (2.13 mg/L) were less than limit as specified in FGG&TLOADING, SC I.1 (20mg/L).

In addition to the stack testing conducted, the facility also operates a CEMS which monitors emissions as percent propane. Percent propane reading can then be converted to pounds VOC per 1,000 gallons of throughput (or mg VOC per L throughput). According to the facility response dated December 3, 2019, "the vapor recovery unit (VRU) is programmed to automatically shut down the loading rack if the permit emission limit is being approached. With an emission limit of 20 mg/L, the CEMS emission

limit is 1.27%. Sunoco has a conservative set point of 1.01% (80% of the emission limit). If the vapor recovery unit experiences an issue or approaches the emission set point, the rack will automatically shut down preventing any loading from occurring. The terminal would then switch to the VCU as the emission control unit before loading is resumed at the rack." As part of the December 3, 2019 submittal, the facility provided the CEMS readings for the day of inspection (November 20, 2019).

During the September 2019 stack tests, the leak detection was conducted satisfying SC V.2.

SC II.1 and VI.1. **COMPLIANCE.** Gasoline and transmix loading shall not exceed 531.45 million gallons per year on a 12-month rolling basis. The highest 12-month rolling throughput for 2019 occurred at the end of October 2019 at 114,863,487 gallons.

SC III. 1. **COMPLIANCE.** Shall not load any delivery vessel with an organic compound having a true vapor pressure greater than 1.5 psia or any delivery vessel that carried, as its previous load, an organic compound having a true vapor pressure greater than 1.5 psia unless all provisions of Rule 706 are met. The provisions of Rule 706 include, but are not limited to, filling the delivery vessel by a submerged fill pipe, and the following:

- a) The delivery vessel shall be controlled by a vapor recovery system that captures all displaced organic vapor and air by means of a vapor tight collection line.
- b) The delivery vessel shall be equipped maintained, or controlled with all of the following:
  - i) An interlocking system or procedure to ensure that the vapor-tight collection line is connected before any organic compound can be loaded.
  - ii) A device to ensure that the vapor-tight collection line shall close upon disconnection so as to prevent the release of organic vapor.
  - iii) 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.
  - iv) 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.
  - v) Hatch openings that are kept closed and vapor-tight during the loading of the delivery vessel.
- c) The permittee shall develop written procedures for the operation of all control measures required by Rule 706 and shall post the procedures in an accessible, conspicuous location near the loading device.

The facility appears to be meeting the above requirements as observed during the inspection. Written procedures for control measure are posted.

SC III. 2. **COMPLIANCE.** Shall not load any delivery vessel subject to control, as specified in SC III.1, unless all provisions of Rule 627 (leaks detection, use of vapor collection, etc.) are met. The facility appears to be in compliance with these requirements.

SC III. 3. **COMPLIANCE.** No later than 60 days after issuance of this permit, the permittee shall submit to the AQD District Supervisor, for review and approval, an updated malfunction abatement/preventative maintenance plan for FGG&TLOADING. After approval of the malfunction abatement/preventative maintenance plan by the AQD District Supervisor, the permittee shall not operate FGG&TLOADING unless the malfunction abatement/preventative maintenance plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. At a minimum Rule 911 requires the plan to include:

- a) Identification of the equipment and all control equipment and the supervisory personnel responsible for overseeing the inspection, maintenance, and repair.
- b) Description of the items or conditions to be inspected and frequency of the inspections or repairs.
- c) Description of equipment and each add-on air pollution control device operating parameters that shall be monitored to detect a malfunction or failure, the normal operating range of the equipment and a description of the method of monitoring or surveillance procedures.
- d) Identification of the major replacement parts that shall be maintained in inventory for quick replacement.
- e) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

The facility submitted an acceptable MAP on June 17, 2019.

SC IV. 1 and 2. **NOT DETERMINED.** VCS shall be designed to prevent VOC vapors collected at one loading rack to pass to another loading rack. VCS shall be designed and operated to prevent gauge pressure in the

delivery vessel from exceeding 0.6 psi and to prevent vacuum from exceeding -0.2 psi gauge. The design of the VCS was not evaluated during the inspection.

SC IV. 3. **COMPLIANCE.** A continuous monitoring system shall be installed, calibrated, certified, operated and maintained according to manufacturer's specifications. The facility maintains a CEMS that monitors VOC emissions, recorded as percent propane. A RATA was performed on September 12, 2019. The relative accuracy was determined to be 1.24% which meets the applicable standard of 10%. The facility appears to be meeting this requirement.

SC IV.4. **COMPLIANCE.** Shall not operate the product loading racks unless the pollution control equipment is installed and operating properly. Satisfactory operation includes maintaining and operating each control device in accordance with the MAP. The facility appears to be meeting this requirement based on visual inspection and MAP records provided.

SC VI.2. **COMPLIANCE.** Shall maintain a record of the results of the inspections performed as required by R 336.1623(8)(a) and (9)(b). According to the facility response, Sunoco does not have any external floating roofs, therefore, R 336.1623 does not apply.

SC III.4 and VI.3 **COMPLIANCE.** Shall only perform two tank cleanings per 12-month rolling time period. Shall maintain a record of the number of tank cleanings per 12-month rolling time period. According to the facility response, one tank cleaning occurred during 2019 (Tank 50 [transmix], August 2019).

SC VI. 4 through 8. **COMPLIANCE.** Shall comply with various requirements of Rule 627 (leaks detection, use of vapor collection, etc.). The facility appears to be in compliance with these requirements.

SC VI.9. **COMPLIANCE.** Shall not allow gasoline to be handled in a manner that would result in vapor release to the atmosphere for extended periods of time. The facility appears to be meeting this requirement.

SC IX. **NOT DETERMINED.** Shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and BBBB. The AQD is not the delegated authority for 40 CFR Part 63, Subpart BBBB.

#### FGGASOLINETKS (EUTANK#38, #39, #42, #44, #50, #51, and #67)

SC II. 2 and VI.3. **COMPLIANCE.** Gasoline and ethanol throughput at EUTANK#42 does not exceed 78,456,000 gallons per year. Recorded 12 month rolling throughputs are less than 78,456,000 gallons. The throughput for EUTANK#42 was reported in the 2018 MAERS at 7,192,286 gallons.

SC III.1. **NOT DETERMINED.** Shall comply with all provisions of the Federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and Kb, as they apply to EUTANK#42. During the inspection Tank #42 was observed from the tank roof level. While the tank appeared to be in good operating condition, verification of the seals, gaskets, valves, sleeves, etc. could not be verified. During the inspection, no odors were detected at roof level.

SC IV.1 and 2, IX.3. **COMPLIANCE.** After April 30, 1981, it is unlawful for a person to store 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 existing fixed roof stationary vessel of more than 40,000-gallon capacity, unless the following condition is met:

The vessel is 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 not have visible holes, tears, or other nonfunctional openings.

All openings, except stub drains, in any stationary vessel subject to the provisions of this rule shall be equipped with covers, lids, or seals so that all of the following conditions are met:

- a) The cover, lid, or seal is in the closed position at all times, except when in actual use.
- b) Automatic bleeder vents are closed at all times, except when the roof is floated off, or landed on, the roof leg supports.
- 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 support.

During the inspection, the applicable tanks appeared to meet these requirements. The facility appears to be in compliance with Rules 604 and 605.

SC VI.1 and IX.1. **COMPLIANCE.** Shall monitor and keep records of true vapor pressure (as defined in R 336.1120(i)) of all organic compounds stored in psia, at actual storage conditions. The material stored shall not have a vapor pressure greater than 11 psia at actual storage conditions. The facility records the Reid vapor pressure and true vapor pressure on a monthly basis. Records provided indicate that the true vapor pressure is less than 11 psia.

SC VI.2 and 5. **COMPLIANCE.** Shall perform inspections and monitor operating information for EUTANK#42 in accordance with the federal Standards of Performance for New Stationary sources as specified in 40 CFR Part 60 Subparts A and Kb, as they apply to EUTANK#42. Shall keep records of inspections and operating information for EUTANK#42 in accordance with the federal Standards of Performance for New Stationary sources as specified in 40 CFR Part 60 Subparts A and Kb, as they apply to EUTANK#42. The facility provided recent inspections via email on January 7, 2020. The facility appears to be meeting the requirements.

SC VI. 4. **COMPLIANCE.** Shall keep readily accessible records that show the dimensions of EUTANK#42 and an analysis that shows the capacity of the storage vessel. The record shall be kept as long as the storage vessel remains in operation. As demonstrated during previous inspections, the facility maintains a master database of all tanks dimensions. As part of the record submittal, the facility provided the most recent strapping chart for Tank #42.

SC VII.1 and VII.2. **COMPLIANCE.** The permittee shall submit reports and notifications for EUTANK#42 in accordance with Subpart Kb as they apply to EUTANK#42. The facility appears to be meeting these requirements as demonstrated in the documents provided via email on January 7, 2020 (see attached). The initial notification for EUTANK#42 is not located in AQD's file, but it is assumed that proper notification was conducted through the issuance of Wayne County Installation Permit C-11177, Installation of Internal Floating Roof in an Existing Storage Tank No. 42.

SC IX. 2. **COMPLIANCE.** Shall not equip any storage tank with an external floating roof. The facility currently does not have tanks equipped with external floating roofs.

#### FGDISTALLATETKS (EUTANK #43, EUTANK#49)

SC III.1. **COMPLIANCE.** Shall not store product with a true vapor pressure of more than 1.5 psia at actual storage conditions. The true vapor pressure for distillate at temperatures likely to be experienced at ambient conditions is less than 1.5 psia.

SC VI. 1. **COMPLIANCE.** The temperature of the stored product is recorded on a daily basis and kept on file. Temperature is recorded on a daily basis and is file. Daily temperatures were provided for October 2, 2019 through October 31, 2019.

#### FGFACILITY

SC I.1, VI.1 and 2. **COMPLIANCE.** VOC emissions shall not exceed 95.0 tons per year on a 12-month rolling basis. The facility maintains VOC emission records. The highest 12-month rolling VOC emissions occurred at the end of June 2019 at 32.56 tons.

SC IX. 1. **NOT DETERMINED.** Shall comply with applicable provisions of BBBB. The AQD is not the delegated authority for 40 CFR Part 63, Subpart BBBB.

#### **Federal and State Requirements**

40 CFR 60, Subpart Kb. **COMPLIANCE.** The date of modification and tank capacity is large enough that, for a terminal throughput of more than 476 barrels/day (75,700 liter/day), emission unit EUTANK#42 is subject to this regulation. The other emission units at the facility were constructed prior to and not modified after July 23, 1984. EUTANK# 42 is equipped with an internal floating roof. The facility appears to be in compliance with the applicable requirements of 40 CFR, Subpart Kb.

40 CFR 60, Subpart XX. **NOT APPLICABLE.** EUGASLOADING at the stationary source is not subject to the New Source Performance Standards for Bulk Gasoline Terminals, promulgated in 40 CFR Part 60, Subpart XX

as the emission unit was constructed prior to December 17, 1980.

40 CFR 63, Subpart R. **NOT APPLICABLE.** Subpart R is not applicable as the facility is not a major source of HAPs (§63.420(2)).

40 CFR 63, Subpart BBBBBB. **NOT EVALUATED.** On July 25, 2019, the facility submitted the reporting required under Subpart BBBBBB: Semi-Annual Compliance Report & Notification of Compliance Status (NOCS), and Summary Report – Gaseous and Opacity Excess Emission and Continuous Monitoring System Performance for Continuous Emission Monitor (CEM) or Temperature Probe & Recorder Monitoring Systems. The AQD is not the delegated authority for 40 CFR Part 63, Subpart BBBBBB.

### Exemptions

The OWS located at the facility appears to be exempt per Rule 285(2)(m); Lagoons, process water treatment equipment, wastewater treatment equipment, and sewage treatment equipment.

The pressurized horizontal butane tank at the facility appears to be exempt per Rule 284(2)(j). Online literature indicates that butane has a boiling point of -1 to 1 degree Celsius (°C).

The natural gas furnace used for office heat at the facility appears to be exempt per Rule 282(2)(b)(i).

### **APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:**

Not applicable. All lots are paved.

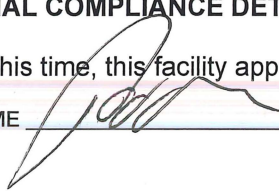
### **MAERS REPORT REVIEW:**

The 2018 MAERS report was timely and complete.

### **FINAL COMPLIANCE DETERMINATION:**

At this time, this facility appears to be in compliance with PTI 143-18A and federal and state regulations.

NAME



DATE

1/13/2020

SUPERVISOR

JK