DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

B292671652

FACILITY: Energy Transfer Marketing & Terminals-River Rouge		**SRN / ID:** B2926
LOCATION: 500 South Dix Avenue, DETROIT		**DISTRICT:** Detroit
CITY: DETROIT		**COUNTY:** WAYNE
CONTACT:		**ACTIVITY DATE:** 04/23/2024
STAFF: Katherine Koster	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: FY2024 Targeted Inspection		
RESOLVED COMPLAINTS:		

REASON FOR INSPECTION: Scheduled Inspection
INSPECTED BY: Katie Koster, AQD
PERSONNEL PRESENT: Jared Everitt, Sr. Environmental Specialist, and Dan Lamonica, Terminal Manager
FACILITY PHONE NUMBER: 313-843-0243
FACILITY FAX NUMBER: 313-475-3500
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FACILITY BACKGROUND

Energy Transfer 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, ethanol, and distillate storage and loading facility. The facility is surrounded by industrial and commercial business. To the north is the Rouge River and Cleveland Cliffs (formerly 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 of day. Sunoco currently has three full time employees at the River Rouge Terminal.

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. However, the facility obtained an opt-out permit with 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 pollutants (HAPs) 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 as stated in the prior inspection report. 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 via pipeline into storage tanks and then loads products from the storage tanks into tank trucks using loading racks. The gasoline loading 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 and is the primary control device. The VCU only operates when the VRU is down for maintenance. Emissions from the VRU are monitored by a continuous emissions monitoring system (CEMS) which records VOC emissions as percent by volume (as propane equivalent). Ethanol is also unloaded at the terminal via a tanker truck; it is not received via the pipeline. It goes directly to the tanks in a loading area separate from the loading rack.

Throughput at this facility has been steadily declining over the years; mostly due to competition in the area and the refinery with its own terminal in close proximity according to Mr. Lamonica. One line with one supplier is the set up at the River Rouge terminal as opposed to 4 lines/7 suppliers at Romulus. This location also lost an export to Canada customer recently.

The below table identifies facility tanks, capacity, and product stored from the prior inspection.

TANK ID	CAPACITY (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

During this inspection, we also discussed these additional tanks:
40 – Out of service; empty tank was used for additives
65 – 725 gallon sample recovery tank
66 – Out of service, SRT empty

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

In addition to the loading rack and tanks, the facility has historically operated a groundwater remediation system.

COMPLAINT/COMPLIANCE HISTORY

On November 20, 2019, facility was inspected and determined to be in compliance with the permit 143-18A.

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 April 23, 2024, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) inspector, Katie Koster, conducted an inspection of Sunoco located at 500 Dix Avenue, Detroit, Michigan. During the inspection, Dan Lamonica and Jared Everitt provided information and a 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.

At approximately 10:00 AM, AQD staff arrived onsite and entered the facility. During the opening meeting, the facility operations were discussed. We also walked through the permit conditions of 143-18A, and the facility answered any questions I had. Mr. Lamonica stated that there have not been any significant modifications to the existing equipment since the last inspection except that the groundwater remediation system had been removed as it was no longer detecting contamination. It has not operated in approximately three years and it was dismantled in the fall of 2023.

Next, we began a tour of the facility. Since the facility is switching to lower RVP fuel due to the upcoming summer months, the tanks are at very low levels. As such, the VCU is in use instead of the VRU. This is because the VRU requires a minimum feet of product in the tank to function properly. The VCU has been operating since 4/18/24.

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. We walked around the tanks, and all appeared to be in good condition from the outside.

We observed the loading system. The system is capable of loading gasoline, transmix, or distillate from loading racks. Prior to tanker loading, the "scully cord" is attached. The scully cord grounds the vehicle and 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. A computer-controlled lockout system prevents the loading of any tank truck which had not been previously registered as certified vapor tight.Written procedures for the operation of all control measures required were posted in accessible, conspicuous locations near the loading devices. See attached photo of posted procedures. Hoses appeared to be in good condition.

Next, we proceeded to the VRU/VCU area. Ben Hall, vapor tech, was on site and accompanied us about the control devices. As the VCU was in use, he pointed out the two pilot flames and an exterior light that would turn red if the flame went out. There is no CMS on this system.

Although the VRU was not in use, he walked me through how the system works and the different parameters that are monitored. We went to the CMS shed. When the VRU is operating, the system will shut down the loading rack if 0.89% on a 1 hour average is recorded. There are two recording systems so one is backup.

According to Mr. Hall, ideally the vacuum needs to be at 27-28 in to really clean the bed. Carbon bed sampling occurs annually and the last time it was sampled was Nov/Dec 2023.

Dan Lamonica also pointed out where the groundwater remediation treatment building used to be.
There is no generator on site.

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. Sampling occurs monthy and results are maintained. See attached.

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 **NA. SYSTEM HAS BEEN REMOVED so conditions were not evaluated.**

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 FGG&TLOADING 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 the limit as specified in FGG&TLOADING, SC I.1 (20mg/L). During the September 2019 stack tests, the leak detection was also 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 2023 was 73,377,698 gallons (73.4 million gallons) in January.

SC III.1. **COMPLIANCE/UNABLE TO DETERMINE**. 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. No trucks were loading during inspection so unable to verify b. However, for a, vapor recovery system is in place and for c, written procedures for control measure are posted. Drives also participate in training with the terminal operator. See attached email from facility.

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 (leak detection, use of vapor collection, etc.) are met. The facility appears to be in compliance with these requirements. Facility conducts monthly sight/smell tests. No issues have been observed. Also, from the facility via email regarding gas detector usage, "If there was a leak detected during LDAR (sight, sound, smell) or terminal "sniff" testing, we would then use a calibrated gas detector to meet this requirement. We did not have any leaks YTD 2024 or in prior years to my knowledge. Part of the TO daily inspection includes the loading rack area, and vapor hose integrity is routinely checked and hoses are replaced if necessary (general wear & tear)."

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. Resubmitted as part of the inspection although no substantive changes have been made. See attached. Also maintenance records for the control devices were submitted and are attached.

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. It is calibrated daily and is maintained by the facility.

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. See attached records.

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 (attached), no tank cleanings have been performed in 2022, 2023, or 2024 YTD.

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 based on procedures, interlocking system, and operator training.

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 BBBBBB. The AQD is not the delegated authority for 40 CFR Part 63, Subpart BBBBBB.

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 for calendar year 2023 was reported as 3,623,327 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 ground level. While the tank appeared to be in good operating condition, verification of the seals, gaskets, valves, sleeves, etc. could not be verified.

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. 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. From the facility: "See attached Tank 42 monthly top tank inspections for 2023 and YTD 2024, as well as the annual seal inspection for 2023; this seal inspection has not yet been performed for 2024. The last OOS 653 inspection was done February 2016, the last detailed seal inspection was done May 2017, and the most recent in-service integrity inspection was done February 2021. These additional records are available upon request". 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.

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 previously provided. 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) – Previously evaluated above.

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 March 2024 as an example of the recordkeeping.

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.

14.73 tons VOC was highest 12 month rolling value for 2023 in March 2023. See attached.

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

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**. facility submits the semi annual 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. However, the AQD is not the delegated authority for 40 CFR Part 63, Subpart BBBBBB.

Exemptions

Below is analysis from the prior inspection. This equipment is still on site and has not been modified as confirmed during most recent inspeciton.

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 2023 MAERS report was timely and complete.

FINAL COMPLIANCE DETERMINATION:

At this time, this facility appears to be in compliance with conditions evaluated in this report.

NAME Katie Koe DATE 5/31/24 SUPERVISOR April L. Wendling 6/7/24