

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

B521545274

FACILITY: MPLX Terminals LLC - Lansing Terminal		SRN / ID: B5215
LOCATION: 6300 W GRAND RIVER, LANSING		DISTRICT: Lansing
CITY: LANSING		COUNTY: CLINTON
CONTACT: Victor Brzeg , TT&R Advanced HES Professional		ACTIVITY DATE: 07/24/2018
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled, announced inspection to determine compliance with PTI 302-05D. Inspection is a Partial Compliance Evaluation (PCE), as part of a Full Compliance Evaluation (FCE).		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow

MPLX Personnel Present: Victor Brzeg, Advanced HES Professional (vibrzeg@marathonpetroleum.com)

Tyler Haan, Facility Manager (tahaan@marathonpetroleum.com)

Purpose: Conduct an announced, scheduled partial compliance evaluation (PCE) inspection by determining compliance with MPLX Lansing Terminals' Permit to Install No. 302-05D, as well as Air Pollution Control's Part 6 Rules and the NSPS Subpart Kb. This includes verification that MPLX stayed within the permit's emission limits to remain an opt-out source and not enter into Title V status. This inspection was conducted as part of a full compliance evaluation (FCE).

Facility Background/Regulatory Overview: MPLX is a fuel (gasoline, diesel, ethanol) distribution facility/terminal.

MPLX is an opt-out facility: VOC's are limited to 90 tpy, individual HAP to 9 tpy and aggregate HAP to 22.5 tpy. Additionally, EURACK is subject to Michigan Air Pollution Control Rules 609 and 627, in addition to the New Source Performance Standards (NSPS) for Bulk Gasoline Terminals, Subpart XX.

EUTANK25-1, -3, and -4 are subject to the NSPS Subpart Kb for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984.

PTI 302-05D was issued to include permitted requirements for a 953-gallon in-ground sump used for transfer of pipeline transmix.

This facility was last inspected in June 2014.

Inspection: At 7:30 a.m. on July 24, 2018 I met with Victor Brzeg and Tyler Haan. I gave V. Brzeg a January 2017 Permit to Install Exemptions Handbook and provided T. Haan with a DEQ "What you Should Know About Vapor Recovery" booklet as well as a "Gasoline Tanker Truck Drivers" brochure for the purposes of outreach. The inspection was announced to ensure that V. Brzeg would be onsite during the inspection, as the environmental point-of-contact, as his home office is not the Lansing Terminal site. Tables 1 & 2 list all emission units (permitted and exempt) that are located at the MPLX Lansing terminal. I watched one loadout during the inspection. To note is that EUTANK5-5 and EUTANK25-6 have been removed and are not included in Table 1.

Table 1. Permitted emission units.

Permitted Equipment Under PTI 302-05D				
ID	Description	Material	Capacity (gallons)	Flexible Group
EURACK	Tanker truck loading rack	Gasoline, diesel, ethanol, additives	NA	FGFACILITY
EUORTANK (1-17)	Fixed roof tank for overpressure relief	Pipeline relief/Diesel	19,000	FGFACILITY
EUSUMP	In-ground steel sump installed in the 1950's	Transmix	935	FGFACILITY
EUTANK8-11	Fixed Roof	Ethanol	316,000	FGGASOLINETANKS, FGFACILITY
25-1	Internal Floating Roof	Gasoline	914,000	FGGASOLINETANKS; FGNSPSTANKS,

				FGFACILITY
25-2	Fixed Roof	Diesel	1,016,000	FGDISTILLATETANKS
25-3	Internal Floating Roof	Gasoline	956,000	FGGASOLINETANKS; FGNSPSTANKS FGFACILITY
25-4	Internal Floating Roof	Gasoline	915,000	FGGASOLINETANKS; FGNSPSTANKS FGFACILITY
25-7	Fixed Roof	Diesel	1,009,000	FGDISTILLATETANKS
25-8	Internal Floating Roof	Gasoline	961,000	FGGASOLINETANKS
15-9	Fixed Roof	Diesel	621,000	FGDISTILLATETANKS
1-12	Fixed Roof	Transmix	19,000	FGTRANSMIXTANKS
1-13	Fixed Roof	Transmix	19,000	FGTRANSMIXTANKS
AA 1-14	Fixed Roof	Additive – Nemo 1121	6,000	FGGASOLINETANKS
AA 1-16	Fixed Roof;	Additive – HiTec 6590M Wholesale	15,000	FGGASOLINETANKS
AA 1-18	Horizontal storage;	Additive – HiTec 4142M	3,000	FGDISTILLATETANKS
AA 1-19	Horizontal storage;	Additive – Unisol Liquid red dye for diesel	600	FGDISTILLATETANKS

Table 2. Exempt emission units

Exempt Equipment		
Tank	Description	Exemption
Butane	90,000 gallon butane tank, under pressure; butane is used to raise the RVP for winter	Rule 284(2)(j)
Ethanol	225 gallon ethanol tank	Rule 290(2)(a)(i)
Gasoline recovery (S-1-21)	225 gallon gasoline recovery tank	Rule 290(2)(a)(ii)(C)
Waste Water Sump	15,000 gal Oil/Water Separator sump from gasoline and diesel drips through the grating at the load rack; located underground. Transfers the captured liquids to EUTANK1-12 and EUTANK1-13 (Transmix tanks)	Rule 284(2)(i)

Exempt Emission Units

The 225-gallon ethanol tank and gasoline recovery tank were installed under exemption Rule 290. The ethanol tank would be exempt from a PTI per Rule 290(2)(a)(i) and the gasoline recovery tank would be exempt from a PTI per Rule 290(2)(a)(ii)(C). Ethanol is a noncarcinogenic VOC; its uncontrolled emissions should not exceed 1000 lbs/month. Gasoline is a carcinogenic air contaminant with an initial risk screening level greater than or equal to 0.04 µg/m³; its uncontrolled emissions should not exceed 20 lbs/month. V. Brzeg stated that the ethanol tank has never been used and therefore there are no emissions that have occurred since its installation. V. Brzeg provided me with MPLX’s spreadsheets which specify tank S-1-21 as the 225-gallon gasoline recovery tank (see attached) for calculated working and standing losses from the tank. During the period of July 2017 – June 2018, the month with the highest VOC emissions was July, at 12.97 lbs, within the 20 lb limits of Rule 290 for calculated VOC and HAP emissions from all emission units onsite.

The 90,000 gallon butane tank is also exempt from a PTI, per rule 284(j); butane has a boiling point of -10°C. Rick Vermeesch, previous terminal manager, explained during the 2014 inspection that the tank is under low pressure, which I would consider "pressurized" as required by the exemption. MPLX meets the PTI exemption for its butane tank.

The wastewater sump is exempt under Rule 284(2)(i); MPLX has demonstrated that the liquids contained in this unit have a true vapor pressure of 0.51 psia (based on partial pressures of each of the constituents within a sample taken from MPLX's Bay City Terminal). See attached Memo from Barr's Brian Leahy.

EURACK

MPLX loads out diesel, kerosene, gasoline blends (containing octane & ethanol), and denatured ethanol through the loading rack (EURACK). A vapor recovery unit (VRU) is installed to collect displaced vapors from the loading rack. It is equipped with 2 carbon beds (which are regenerative and where flow is switched between each bed every 15 minutes, which reclaim from 1-3 gallons for every 1000 gallons of vapor (according to T. Haan). In the past, when the VRU was undergoing maintenance there were portable control devices (a Rane combustor [thermal oxidizer] and a Zink flare) that were brought onsite to combust vapors. T. Haan said that they no longer do this; instead, when the VRU is down for maintenance MPLX does not allow trucks to be loaded during that time. There was 1 VRU shutdown during October, November, and December 2017, and January 2018; 2 shutdowns in February 2018, and 3 shutdowns in May 2018.

Emission Limits

MPLX is limited to 31 mg/L from EURACK, determined via stack test, as required by NSPS Subpart XX. At this time, it is my professional judgment that a stack test to verify this emission rate is not required at this time because we've received no odor complaints for this facility (odors could indicate that vapors were not being captured or controlled correctly); however, MPLX conducts their own performance tests on the unit. The last test to determine emissions was conducted in August 2008, at which time the carbon canisters were also changed out. The compliance test showed emissions at 2.36 mg/L. T. Haan said they plan to change the carbon canisters out again in 2018, at which time they will test again.

Material Limits

MPLX is limited to 400,000,000 gallons of gasoline, gasoline additives and ethanol (EtOH) and 100,250,000 gallons of distillate fuel and distillate additives per 12-month rolling time period. For the 12-month rolling period June 2017 – May 2018, the gasoline/additive/EtOH gallon throughput was 188,193,607 gallons; the highest 12-month rolling throughput was at the end of June 2017 at 193,646,336 gallons; the 12-month rolling distillate/distillate additive throughput for the same period was 26,898,076 gallons, with the highest 12-month rolling throughput at 29,810,295 gallons in June 2017 (see attached records). The material throughput during this period for both types of fuel are within the permitted limits.

There are no Process/Operational Restrictions for EURACK at this time.

Design/Equipment Parameters

MPLX is required to operate a vapor control system that is installed, maintained and operated in a satisfactory manner for all times when EURACK is used to load tanker trucks with organic compounds with a true vapor pressure of more than 1.5 psia (this includes gasoline).

T. Haan explained that there are indicators they look for that indicate the VRU is not operating properly. He said if there is a malfunction with the VRU, there is a mechanism that shuts down the loading rack, not allowing trucks to be loaded during the malfunction. They also maintain the carbon beds in the VRU by conducting a carbon bed test on a monthly basis to check for breakthrough. They use %LEL to determine breakthrough and they ensure that trucks are loading during the carbon bed check.

MPLX is also required to operate the loading rack in accordance with Michigan Air Pollution Control Rules 609 and 627, in addition to the New Source Performance Standard (NSPS) Subpart XX for Bulk Gasoline Terminals.

Michigan Air Pollution Control Rule 609

In order to operate EURACK, MPLX must be in compliance with applicable conditions in Rule 609. Rule 609 requires the following:

An interlocking system or procedure to ensure that the vapor-tight collection line is connected before any organic compound can be loaded (this is in reference to the vapor collection line from the load rack to the VRU)

T. Haan explained that the vapor return hoses are inspected daily for worn ends on the connection or wear and tear on the hose itself (which is double-walled). Personnel onsite check for the sight, sound or smell of VOCs while trucks are loading. Additionally, the Quality Dairy tanker truck driver during the inspection said that he would hear the pressure relief valve whistle if the vapor recovery hose was not in use/not connected properly. T. Haan said that on a random monthly basis they will check for vapor leaks with a PID on the seal. The LEL will tell if there is a vapor leak. During the inspection T. Haan used his PID on a Quality Dairy tanker truck to check for leaks. The LEL meter read 0, i.e. there were no vapors leaking from the collection line. Each truck driver is also trained in MPLX's procedures for loading trucks, including attaching the vapor recovery hose correctly.

2. *A device to ensure that the vapor-tight collection line shall close upon disconnection so as to prevent the*

release of organic vapor.

T. Haan said there are dry lock couplers to minimize leaks from both gasoline and vapors.

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.

T. Haan said that there is a dry lock coupler on the loading rack that allows for disconnections without liquid drainage. While onsite, I noticed that a few drips do occur after loading and disconnection from the trucks, but the drips were minimal and would not contribute significantly to VOC emissions. Drips are also allowed per Michigan Air Pollution Control Rule 627.

Pressure-vacuum relief valves that are vapor-tight and set to prevent emission of displaced organic vapor during the loading of the delivery vessel, except under emergency conditions.

There are pressure vacuum relief valves on the vapor lines, according to T. Haan and the Quality Dairy truck driver. They are used to prevent over pressurization of the truck compartment.

Hatch openings that are kept closed and vapor-tight during the loading of the delivery vessel.

I asked how MPLX would be able to determine whether the hatch openings are closed and vapor-tight or open.

T. Haan explained that the tanker trucks get yearly and 5-year inspections. During the 1-year inspections the hatches are checked to ensure they are working properly; during the 5-year inspections, the hatches are replaced. The Quality Dairy truck driver also said that if the hatch was not vapor-tight during loading, the flow in the vapor hose would be audibly slower than normal. There were no abnormalities in the flow to the Quality Dairy truck during the inspection.

Michigan Air Pollution Control Rule 627

Rule 627 requires that EPA test Method 27 (a pressure/vacuum test) be conducted on all delivery vessels annually.

By Executive Order 3012-15, compliance determinations of the "627 Program" have been transferred from the DEQ to the Department of Licensing and Regulatory Affairs (LARA) as of December 3, 2012

(https://www.michigan.gov/lara/0,4601,7-154-42271_4115-11914--,00.html). Under their authority, the vessel can be provisionally certified. As a spot-check of compliance with this regulation. A list of approved tank trucks can be found here: https://www.michigan.gov/documents/lara/BFS--R627-Approved-Tank-Test_408258_7.pdf.

T. Haan provided me with a copy of "Gasoline Tank Truck Pressure/Vacuum Test Results" for a Brenner truck, unit # 171, tested under Walker's Truck and Trailer Services (see attached) tested on 5/24/18. LARA has an online list of all truck test results that are in compliance with Rule 627. According to this list, Brenner Oil Co Truck, Unit 171, is certified for delivery. MPLX's Haller Portal (database) is then constructed from these certifications: a group reviews the test results sheets to make sure that these particular trucks are certified to load at MPLX's load rack. This also provides MPLX with a list of truck drivers who must go through MPLX's loading procedure. T. Haan also explained that if the trucks are not tested by the expiration date (1 year from previous test), the truckers are not capable of entering MPLX's yard. The badge that they scan to get into the yard will not work. T. Haan explained that it is important for the truckers to submit their test results paperwork in to MPLX as soon as possible so that MPLX can enter this information into the system, consequently allowing the trucks access to their yard.

Rule 627 also requires that there shall be no gas detector reading greater than or equal to 100% of the LEL at a distance of 1 inch from the location of the potential leak in the vapor collection system using the method in Rule 2005, which is used to confirm leak-tightness of the gasoline delivery vessel tanks during loading, but also for determining leak-tightness on the VRU. T. Haan explained that they conduct monthly checks on the VRU, and provided me a copy of their procedure for doing so (attached, "GDGACT Stack Monitoring"). They conduct the checks on the VRU while trucks are being loaded, and if the reading on their PID is 40% or greater of the LEL, they retest, and then monitor more closely to ensure that the emissions are not greater than 100% of the LEL. T. Haan explained that they calibrate the LEL meter every month and is bump-checked prior to each use. I will send a follow-up email to T. Haan and V. Brzeg requesting that they review their "GDGACT Stack Monitoring" procedure to ensure compliance with Rule 2005 (I will include a screenshot of this Rule for their convenience).

NSPS Subpart XX

Subpart XX requires that data be kept on all tank truck delivery vessels: Test Title (Method 27), the tank owner and address, tank ID number, testing location, date of test, tester's name and signature, witnessing inspector (if any), and the test results (consisting of an average of 2 runs with actual pressure change in 5 minutes). The "Gasoline Tank Truck Pressure/Vacuum Test Results" contains all of this information for compliance with the NSPS, as discussed under Rule 627.

MPLX is also required to **EITHER** use a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (via card lock-out system), a copy of the documentation is made available for inspection, and can only be used **OR** the vapor collection system/vapor processing system and loading rack are checked for vapor tightness on a monthly basis consisting of the following data:

- The date of inspection
- Findings (no leaks, location nature and severity of each leak)
- Leak determination method
- Corrective action (date leak repaired, reasons for repair interval greater than 15 days)
- Inspector name/signature

MPLX has chosen to use the terminal automation system to prevent uncertified cargo tanks for entering their property, as previously discussed under Rule 627.

Monitoring/Recordkeeping

MPLX is required to keep logs of all VRU outages. T. Haan explained that loadouts never occur during VRU downtime. MPLX has a "Downtime and Reliability" system where VRU outages are recorded. T. Haan showed me records in this system, which can be brought up for any month. There was 1 VRU shutdown during October, November, and December 2017, and January 2018; 2 shutdowns in February 2018, and 3 shutdowns in May 2018.

Stack/Vent Restrictions

The stack requirements for the VRU say that the stack should be unobstructed and aligned vertically upwards. According to an email from Terry Wright, past permit engineer for MPLX's permits; he said that this condition was accidentally copied to the "C" permit. Currently MPLX has a horizontal discharge point for the VRU stack. I will request that MPLX submit a permit modification to modify the stack requirement to a horizontal discharge point. A modification to the permit is necessary to ensure compliance with the PTI.

There are no Testing/Sampling or Reporting requirements for EURACK at this time.

MPLX is currently in compliance with PTI requirements, Rule 609, 627, and NSPS Subpart XX requirements for EURACK at this time.

EUORTANK

The EUORTANK (MPLX's tank 1-17) is a fixed roof storage tank used for overfill/overpressure pipeline relief. One to two inches of diesel is kept at the bottom of the tank – just enough to cover the pipe receipt line.

There are no Emission Limits, Testing/Sampling, Monitoring/Recordkeeping, or Reporting requirements for EUORTANK at this time.

Material Limits

MPLX is limited to 100,000 gallons of throughput through EUORTANK. During the 2014 inspection, Kim Crame said that this tank would contain diesel but that it hasn't had any throughput since 2011. V. Brzeg provided me with 12-month rolling throughput records (attached) for EUORTANK, which shows that there was no throughput through the tanks between June 2017 and May 2018.

Design/Equipment Parameters

While there are Rule 604 requirements in the permit, the Rule 604 conditions do not apply to EUORTANK because its capacity is less than 40,000 gallons (i.e. 19,000 gallons).

Stack/Vent Restrictions

The permit requires a minimum stack height of 32 feet above ground level. The height of the tank itself is 31'5" and it is therefore likely that the stack reaches at least 32 feet above ground level.

MPLX is in compliance with the PTI requirements for EUORTANK at this time.

EUTANK8-11

EUTANK8-11 is a fixed roof storage tank for denatured ethanol.

There are no Emission Limits, Material Limits, Testing/Sampling, Monitoring/Recordkeeping, Reporting, or Stack Vent Restrictions requirements for EUTANK8-11 at this time.

Process/Operational Restrictions

EUTANK8-11 contains denatured ethanol. Rule 604 requirements are applicable to this emission unit, however, because ethanol has true vapor pressure of less than 1.5 psia, the conditions in the rule do not apply to this tank. The true vapor pressure of ethanol is around 0.09 psia.

Design/Equipment Parameters

Conservation vents or thief hatches are required to be installed and operating properly. EUTANK8-11 has a vent for breathing of the tanks.

MPLX is in compliance with the PTI requirements for EUTANK8-11 at this time.

EUSUMP

This is a 935-gallon in ground steel sump that was permitted under PTI 302-05D. V. Brzeg explained that this unit has been around since the facility has been there, but that it has been overlooked. He mentioned that MPLX may install an

aboveground tank to replace this sump. It is used to collect transmix and transfer to the transmix tanks.

There are no Emission Limits, Material Limits, Design/Equipment Parameters, Testing/Sampling, Monitoring/Recordkeeping, Reporting, or Stack/Vent Restrictions requirements for EUSUMP at this time.

Process/Operational Restrictions

The hatch on the sump is required to be closed at all times that the hatch is not in use. V. Brzeg, T. Haan and myself verified that the hatch is closed, but noted that the seal surrounding the hatch is bad. V. Brzeg said that they conducted monitoring around the hatch and found no leaks. They plan on replacing the seal in the future.

MPLX is in compliance with the PTI requirements for EUSUMP at this time.

FGGASOLINETANKS

FGGASOLINE TANKS is composed of tanks 25-1,3,4,8; AA-14,16; and 8-11 generally used for gasoline storage (8-11 does not contain gasoline). T. Haan said that tanks 25-6 and 5-5 have been removed. I will recommend to V. Brzeg that MPLX submit a PTI modification to have these 2 units removed from the permit.

There are no Emission Limits, Material Limits, Process/Operational Restrictions, Testing/Sampling, Monitoring/Recordkeeping, Reporting, or Stack/Vent Restrictions requirements for FGGASOLINETANKS at this time.

Design/Equipment Parameters

MPLX is required to install internal floating roof controls on all tanks in FGGASOLINETANKS; however, tanks AA-14,16, and 8-11 have internal fixed roofs. I will recommend that MPLX submit a PTI modification to correct this requirement to clarify that this requirement is only for the floating roof tanks in FGGASOLINETANKS.

The tanks in this flexible group are also required to be in compliance with Rule 604. Rule 604 requires that those fixed roof tanks greater than 40,000 gallons containing organic compounds with a true vapor pressure greater than 1.5 psia must comply with Rule 604. Tanks AA-14,16 and 8-11 (fixed roof tanks) are all below that 40,000-gallon capacity (they are 6,000 and 15,000, respectively) and therefore Rule 604 does not apply to these tanks. I will recommend to V. Brzeg that MPLX look into submitting a PTI modification to have requirements in the PTI that reflect what is currently present onsite.

MPLX is in compliance with all requirements for FGGASOLINETANKS at this time.

FGNSPSTANKS

This FG takes into consideration requirements for all tanks subject to the NSPS Subpart Kb. This includes tanks 25-1, 25-3, and 25-4. Tanks 25-6 and 5-5 have been removed.

There are no Emission Limits, Material Limits, Process/Operational Restrictions, Design/Equipment Parameters, Testing/Sampling, Reporting, or Stack/Vent Restrictions requirements for FGNSPSTANKS at this time.

Monitoring/Recordkeeping

MPLX is required to keep records of emissions and operating information to comply with NSPS Subparts A and Kb.

The 3 tanks meet the capacity and true vapor pressure (at daily average surface temperature) that allow them to fall under the requirements of 60.112b(a). The 3 tanks are equipped with internal floating roofs inside storage vessels that have fixed roofs. These types of tanks are required to meet one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof (60.112b(a)(1)(ii)):

- Foam or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal)
- 2 seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof
- A mechanical shoe seal (metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof)

T. Haan verified that all 3 tanks are equipped with mechanical shoe seals.

Inspections for internal floating roof tanks with mechanical shoe primary seals are required per the following (60.113b(a)) and records for each are required under 60.115b(a)(1)-(4):

- Visually inspect the internal floating roof and the primary seal prior to filling the storage vessel – inspect for tears, holes, other openings in the primary seal and repair before filling. Any damages needs to be fixed before filling (60.113b(a)(1))
- Visually inspect the floating roof and primary seal through manholes and roof hatches on the fixed roof at least once

- every 12 months after initial fill.
 - o Checks should be done to ensure that the internal floating roof is resting on the surface of the liquid and that there is not liquid accumulated on the roof, and that the seal is not detached.
 - o If there are issues with the seal or roof, they are to be repaired or the tanks emptied within 45 days. (60.113b(a)(2))
- Visually inspect the internal floating roof, the primary seal, gaskets, slotted membranes each time the storage vessel is emptied and degassed. If there are defects in the floating roof, holes, tears or openings in the seal, the gaskets no longer close off the liquid surfaces from the atmosphere, these items should be repaired before refilling the storage vessel.
 - o These inspections should not occur at intervals greater than 10 years (60.113b(a)(4))
- Notify AQD in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by 60.113b(a)(1) and 60.113b(a)(4), to afford AQD the opportunity to have an observer present. (60.113b(a)(5))

V. Brzeg said that rather than annual (12-month) visual inspections of the internal floating roof and primary seal through manholes or roof hatches, MPLX conducts these inspections quarterly. He provided me with all quarterly inspection dates for those conducted between 2014 and 2018 for each of the NSPS Subpart Kb-subject tanks. Table 3 contains the most recent visual inspection. V. Brzeg also provided an example of one quarterly inspection per tank, which includes all items inspected. These inspections meet the requirements of 60.113b(a)(2). V. Brzeg verified that for each of these quarterly inspections they found no issues that needed to be fixed.

The AQD and MPLX are currently having discussions concerning the interpretation of the NSPS Subpart Kb 60.113b(a)(4). Currently it is the AQD's position that all NSPS Subpart Kb-subject tanks are required to be inspected under emptied and degassed conditions at intervals no greater than 10 years. It is MPLX's interpretation of 60.113b(a)(4) that 10-year inspections need to be conducted, but that they can be conducted while the tanks are in service. MPLX has conducted their 10-year inspections according to their interpretation of the regulation. See Table 3 for their most recent inspections conducted on the in-service tanks. V. Brzeg provided me with the inspection records for their 2 most recent 10-year in-service tank inspections for each tank (attached).

MPLX conducts the 60.113b(a)(4) inspections on emptied/degassed tanks, but these inspections occur at intervals greater than 10 years. The most recent empty/degassed tank inspected was conducted this year on Tank 25-1. The AQD received notification from V. Brzeg on 7/24/18 that Tank 25-1 had been taken out of service so that a routine API-653 internal tank inspection could be conducted. They plan to return the tank back into service on August 28, 2018. This notification meets the requirements under 60.113b(a)(5).

Table 3.

Tank	Last "Annual" (quarterly) Inspection [60.113b(a)(2)]	Most recent 10-year inspection (in-service tank)	Prior Year 10-year (in-service tank) inspection [60.113b(a)(4)]	Most recent 10-year inspection (emptied/degassed tank) [60.113b(a)(4)]	Prior 10-year inspection (emptied/degassed tank) [60.113b(a)(4)]
25-1	6/21/2018	6/25/15	2/12/2010	2018	4/20/2000
25-3	6/25/2018	6/23/15	4/13/2011	Data not available	Data not available
25-4	6/22/2018	6/24/15	2/12/2010	Data not available	Data not available

FGDISTILLATETANKS

FGDISTILLATETANKS includes EUTANK25-2, -7, EUTANK15-9, EUTANKAA1-18 and EUTANKAA1-19. These tanks are used for storing distillates and distillate additives.

There are no Emission Limits, Material Limits, Process/Operational Restrictions, Testing/Sampling, Monitoring/Recordkeeping, Reporting, or Stack/Vent Restrictions requirements for FGDISTILLATETANKS at this time.

Under PTI 302-05C, there were Material Limits present, but they are not in the new PTI, 302-05D. I will discuss with the Permits Section if the omission of the 880,000 gallons per 12-month rolling time period material throughput limit was intentional, as the Evalform does not discuss this change.

Design/Equipment Parameters

The only requirement for these tanks is that the conservation hatch be installed and operating properly. Annual visual inspections are conducted on these and verified to be operating properly.

FGTRANSMIXTANKS

K. Crame explained that a 'transmix' is a mixture of diesel and gas and one replaces the other in the pipeline when bringing in product. FGTRANSMIXTANKS consists of EUTANK1-12 and EUTANK1-13.

There are no Emission Limits, Material Limits, Process/Operational Restrictions, Testing/Sampling, Monitoring/Recordkeeping, or Reporting requirements for FGTRANSMIXTANKS at this time.

Design/Equipment Parameters

Brian Leahy, MPLX's consultant from Horizon Environmental, sent an email to Permit Engineer Terry Wright (cc'ing me) dated June 24, 2014 explaining MPLX's stance on EORTANK and FGTRANSMIXTANKS condition for having a conservation vent/thief hatch (condition IV.1):

"...MPC has historically installed and operated conservation vent/thief hatches on its fixed-roof storage tanks, including EUORTANK and FGTRANSMIXTANKS. The primary purpose of these devices is to ensure that the tanks are not exposed to either too much vacuum or pressure. That is, these are primarily safety devices and not emissions control devices since they're designed to vent to atmosphere during product loading and to allow the tank to breath as pressure in the tank increases. MPC has determined that a malfunction of these devices could result in damage to the structural integrity of the tank during periods of high vacuum or pressure. Therefore, MPC intends to remove these devices from its lower volatility fixed-roof storage tanks, likely when the tank goes through its required 653 inspection. Accordingly, conditions requiring the installation and operation of a conservation vent/thief hatch on these tanks should be removed from the PTI. Note that in support of the PTI, emissions were estimated and dispersion modeling analyses were conducted assuming that these tanks were operating without emissions control. Therefore, the removal of the devices would not result in emissions or air quality impacts above what has already been determined for these tanks.

As of 7/24/18 these proposed changes have not been incorporated into the PTI. I will forward this email to V. Brzeg and ask that he consider the items B. Leahy outlined; this includes B. Leahy's desire to removing references to Rule 604 in the other emission units and flexible groups, and removing the flexible group, FGDISTILLATETANKS, from the PTI.

FGFACILITY

FGFACILITY encompasses both exempt and permitted equipment located source-wide at this facility.

There are no Material Limits, Process/Operational Restrictions, Design/Equipment Parameters, Testing/Sampling, or Stack/Vent Restrictions requirements for FGFACILITY at this time.

Emissions Limits & Monitoring/Recordkeeping

MPLX is limited to 90 tpy VOC, 9 tpy individual HAPs and 22.5 tpy combined HAPs, which categorizes MPLX as an opt-out facility for these 3 types of contaminants.

V. Brzeg provided me with 12- month rolling emissions data for each of these emission limitations from June 2017 – May 2018. HAP emissions are calculated using EPA's tanks program. The highest 12-month rolling VOC and aggregate HAPs emissions throughout this time period were 31 tons (end of October 2017) and 1.4 tons (end of October 2017), respectively.

MPLX keeps records for each individual HAP (benzene, ethylbenzene, hexane, toluene, trimethylpentane (2,2,4), trimethylbenzene(1,2,4), xylene, naphthalene, and cumene), on a monthly and 12-month rolling total for each HAP, as determined at the end of each calendar month (attached). The HAP with the highest emission rate during the August 2016 – July 2017 period, was hexane at 0.43 tons at the end July 2017. For the period June 2017 – May 2018, the 12-month rolling highest emitting individual HAP was also hexane at 0.42 tons.

MPLX is also required to keep monthly and 12-month rolling throughput records (as determined at the end of each calendar month) on a tank-specific and petroleum product-specific products for all tanks except EUORTANK. MPLX has these records within their "12-month Rolling Emissions and Throughput Summary" as well as the throughput for EUORTANK (as worst case gasoline throughput).

MPLX is in compliance with all conditions in FGFACILITY at this time.

Safety/PPE: MPLX Terminals require hard hats, safety glasses, steel-toed shoes, and flame protective clothing.

Compliance statement: MPLX Lansing Terminal is in compliance with PTI 302-05D, Michigan Air Pollutoin Control Rules 609 and 627, the NSPS Subpart XX. Compliance with NSPS Subpart Kb is pending discussions with MPLX and AQD staff.

NAME Murray M. Leahy DATE 8/23/18 SUPERVISOR B.M.