

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

September 6, 2024

PERMIT TO INSTALL
42-05E

ISSUED TO
Citgo Petroleum Corporation – Niles Terminal

LOCATED AT
2233 South Third Street
Niles, Michigan 49120

IN THE COUNTY OF
Berrien

STATE REGISTRATION NUMBER
B9043

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203:

August 7, 2024

DATE PERMIT TO INSTALL APPROVED:

September 6, 2024

SIGNATURE:

DATE PERMIT VOIDED:

SIGNATURE:

DATE PERMIT REVOKED:

SIGNATURE:

PERMIT TO INSTALL

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COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

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

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO ₂ e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM ₁₀	Particulate Matter equal to or less than 10 microns in diameter
PM _{2.5}	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO ₂	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install 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 this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit 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 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. 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 Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department 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 condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
12. 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). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

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))	Flexible Group ID
EUTANK1	1,008,000 gallon internal floating roof tank for storing gasoline or distillate fuel oil	FGFUELTANKS
EUTANK2	2,310,000 gallon internal floating roof tank for storing gasoline or distillate fuel oil	FGFUELTANKS
EUTANK5	5,040,000 gallon internal floating roof tank for storing gasoline or distillate fuel oil	FGFUELTANKS
EUTANK10	10,584 gallon horizontal tank for storing gasoline additive	NA
EUTANK11	6,006 gallon horizontal tank for storing gasoline additive	NA
EUTANK12	1,000 gallon horizontal tank for storing premium diesel fuel additive	NA
EUTANK13	1,000 gallon horizontal tank for storing premium diesel fuel additive	NA
EUTANK14	8,000 gallon horizontal tank for storing lubricity additive for diesel fuel	NA
EUTANK15	30,000 gallon fixed roof tank for ethanol	FGETHANOLTANKS
EUTANK16	30,000 gallon fixed roof tank for ethanol	FGETHANOLTANKS
EUTANK17	30,000 gallon fixed roof tank for ethanol	FGETHANOLTANKS
EUTANK19	8,000 gallon horizontal tank for storing gasoline additive	NA
EUTANK21	2,000 gallon underground knockout tank	NA
EUTANK22	10,000 gallon underground petroleum contact water (PCW) tank	NA
EUTANK23	10,000 gallon horizontal petroleum contact water tank	NA
EUTOTE18	550 gallon red dye storage tote	NA
EULOADRACK	Three-bay, twelve-arm loading rack with vapor combustion unit	NA

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

EULOADRACK EMISSION UNIT CONDITIONS

DESCRIPTION

Three-bay, twelve-arm loading rack with vapor combustion unit.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Vapor combustion unit

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	30mg/L of organic compounds loaded	Hourly	EULOADRACK	SC V.1	R 336.1205, R 336.1609, R 336.1702(a)
2. VOC	43.3 tpy	12-month rolling time period as determined at the end of each calendar month.	EULOADRACK	SC VI.3	R 336.1205(1)(a) &(3), R 336.1225

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Gasoline	189,000,000 gallons	12-month rolling time period as determined at the end of each calendar month	EULOADRACK	SC VI.2	R 336.1205(1)(a) &(3), R 336.1225, R 336.1702(a)
2. Distillate fuel oil	82,200,000 gallons	12-month rolling time period as determined at the end of each calendar month	EULOADRACK	SC VI.2	R 336.1205(1)(a) &(3), R 336.1225, R 336.1702(a)
3. Ethanol	18,900,000 gallons	12-month rolling time period as determined at the end of each calendar month	EULOADRACK	SC VI.2	R 336.1205(1)(a) &(3), R 336.1225, R 336.1702(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee 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 609 are met. The provisions of Rule 609 include, but are not limited to, filling the delivery vessel by a submerged fill pipe, and the following: **(R 336.1609)**
 - 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. **(R 336.1609(2)&(3))**
 - b) The delivery vessel shall be equipped maintained or controlled with all of the following: **(R 336.1609(4))**

- 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 609 and shall post the procedures in an accessible, conspicuous location near the loading device. **(R 336.1609(5))**
2. The permittee shall not load any delivery vessel subject to control, as specified in SC III.1, unless all provisions of Rule 627 are met. The provisions of Rule 627 include, but are not limited to, the following: **(R 336.1205(1)(a) & (3), R 336.1627, R 336.1702(a), R 336.1910)**
- a) There shall be no gas detector reading greater than or equal to 100 percent of the lower explosive limit at a distance of 1 inch from the location of the potential leak in the vapor collection system. Leaks shall be detected by a combustible gas detector using the test procedure described in Rule 2005. **(R 336.1627(7))**
 - b) 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 336.1627(8))**
 - c) The vapor collection system shall be designed and 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 336.1627(9))**
 - d) Any delivery vessel or component of a vapor collection system that fails to meet any provision of this rule shall not be operated until the necessary repairs have been made, the vessel or collection system has been retested, and the test results have been submitted to the department. **(R 336.1627(11))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EULOADRACK unless the vapor combustion unit is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes ensuring the presence of a flame in the vapor combustion unit during organic compound loading. **(R 336.1205, R 336.1225, R 336.1609, R 336.1627, R 336.1910)**

V. TESTING/SAMPLING

1. Upon request from the AQD District Supervisor, the permittee shall verify VOC emission rates from the vapor combustion unit controlling EULOADRACK by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
VOCs	40 CFR Part 60, Appendix A

No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.2001, R 336.2003, R 336.2004, R 336.1702(a))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall monitor, in a satisfactory manner, the throughput of gasoline, distillate fuel oil, ethanol, additives, and dyes for EULOADRACK on a monthly and 12-month rolling time period basis. **(R 336.1205, R 336.1225, R 336.1702(a))**

2. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the throughput of gasoline, distillate fuel oil, and ethanol for EULOADRACK, as required by SC II.1, II.2, and II.3. The permittee shall keep these records on file for a period of at least five years and make the records available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1702(a))**
3. The permittee shall calculate the VOC emission rate from EULOADRACK monthly, for the preceding 12-month rolling time period, using a method acceptable to the AQD District Supervisor. The permittee shall keep these records on file for a period of at least five years and make the records available to the Department upon request. **(R 336.1205)**

VII. REPORTING

NA

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. EULOADRACK	96 ¹	35 ¹	R 336.1225

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

FLEXIBLE GROUP SPECIAL CONDITIONS

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
FGFUELTANKS	Internal floating roof tanks for storing gasoline or distillate fuel oil.	EUTANK1, EUTANK2, EUTANK5
FGETHANOLTANKS	Fixed roof tanks for storing ethanol.	EUTANK15, EUTANK16, EUTANK17

FGFUEL TANKS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Internal floating roof tanks for storing gasoline or distillate fuel oil.

Emission Unit: EUTANK1, EUTANK2, EUTANK5

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	18.32 tpy	12-month rolling time period as determined at the end of each calendar month.	FGFUEL TANKS	SC VI.3	R 336.1205

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Gasoline	189,000,000 gallons	12-month rolling time period as determined at the end of each calendar month.	FGFUEL TANKS	SC VI.2	R 336.1205
2. Distillate fuel oil	82,200,000 gallons	12-month rolling time period as determined at the end of each calendar month.	FGFUEL TANKS	SC VI.2	R 336.1205, R 336.1225

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUTANK1 unless all provisions of Rule 604 are met. **(R 336.1604, R 336.1910)**
2. The permittee shall not operate EUTANK2 unless all provisions of Rule 604 are met. **(R 336.1604, R 336.1910)**
3. The permittee shall not operate EUTANK5 unless all provisions of Rule 604 are met. **(R 336.1604, R 336.1910)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate any tank in FGFUEL TANKS unless the tank's internal floating roof is installed, maintained, and operated in a satisfactory manner. **(R 336.1205, R 336.1910, R 336.1702(b), 40 CFR Part 60 Subparts A & Kb)**

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall monitor, in a satisfactory manner, the gasoline and distillate fuel oil throughput for FGFUEL TANKS on a monthly and 12-month rolling time period basis. **(R 336.1205, R 336.1225)**
2. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the gasoline and distillate fuel oil throughput for FGFUEL TANKS, as required by SC II.1 and II.2. The permittee shall keep these records on file for a period of at least five years and make the records available to the Department upon request. **(R 336.1205, R 336.1225)**
3. The permittee shall calculate the VOC emission rate from FGFUEL TANKS monthly, for the preceding 12-month rolling time period, using a method acceptable to the AQD District Supervisor. The permittee shall keep these records on file for a period of at least five years and make the records available to the Department upon request. **(R 336.1205)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FGETHANOLTANKS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Fixed roof tanks for storing ethanol.

Emission Unit: EUTANK15, EUTANK16, EUTANK17

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	1.67 tpy	12-month rolling time period as determined at the end of each calendar month.	FGETHANOLTANKS	SC VI.2	R 336.1205

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Ethanol	18,900,000 gallons	12-month rolling time period as determined at the end of each calendar month.	FGETHANOLTANKS	SC VI.1	R 336.1205

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall keep, in a satisfactory manner, monthly and rolling 12-month time period records of the ethanol throughput for FGETHANOLTANKS, as required by SC II.1. The permittee shall keep these records on file for a period of at least five years and make the records available to the Department upon request. (R 336.1205)

2. The permittee shall calculate the VOC emission rate from FGETHANOLTANKS monthly, for the preceding 12-month rolling time period, using a method acceptable to the AQD District Supervisor. The permittee shall keep these records on file for a period of at least five years and make the records available to the Department upon request. **(R 336.1205)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FGFACILITY CONDITIONS

DESCRIPTION

The following conditions apply source-wide to all process equipment including equipment covered by other permits, grand-fathered equipment, and exempt equipment.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	89 tpy	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	VI.1	R 336.1205(3)
2. any individual HAP	8.9 tpy	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	VI.1	R 336.1205(3)
3. total HAPs	22.4 tpy	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	VI.1	R 336.1205(3)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall calculate the VOC, individual HAP, and total HAPs emission rates from FGFACILITY monthly, for the preceding 12-month rolling time period, using a method acceptable to the AQD District Supervisor. The permittee shall keep these records on file for a period of at least five years and make the records available to the Department upon request. (R 336.1205(3))

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA