MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

April 12, 2017

PERMIT TO INSTALL 223-06A

ISSUED TO MPLX Terminals, LLC

G-6065 North Dort Highway Mount Morris, Michigan

> IN THE COUNTY OF Genesee

FRIS PENINSULA

STATE REGISTRATION NUMBER B7110

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. 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: March 23, 2017				
DATE PERMIT TO INSTALL APPROVED: April 12, 2017	SIGNATURE:			
DATE PERMIT VOIDED:	SIGNATURE:			
DATE PERMIT REVOKED:	SIGNATURE:			

PERMIT TO INSTALL

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Common Abbreviations / Acronyms

Common Abbreviations / Acronyms Common Acronyms Pollutant / Measurement Abbreviations			
AQD			
BACT	Best Available Control Technology	acfm BTU	Actual cubic feet per minute
CAA	Clean Air Act		British Thermal Unit
CAA		°C	Degrees Celsius
	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/	Michigan Department of Environmental	°F	Degrees Fahrenheit Grains
department EU	Quality Emission Unit	gr HAP	Hazardous Air Pollutant
FG	Flexible Group	Hg	Mercury
GACS	Gallons of Applied Coating Solids	hr	Hour
GC	General Condition		
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H ₂ S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
		lb	Pound
IRSL	Initial Risk Screening Level	m	Meter
ITSL	Initial Threshold Screening Level	mg	Milligram
LAER	Lowest Achievable Emission Rate	mm	Millimeter
MACT	Maximum Achievable Control Technology	MM	Million
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts
MAP	Malfunction Abatement Plan	NMOC	Non-methane Organic Compounds
MDEQ	Michigan Department of Environmental	NOx	Oxides of Nitrogen
14050	Quality	ng	Nanogram
MSDS NA	Material Safety Data Sheet Not Applicable	PM	Particulate Matter
NAAQS	National Ambient Air Quality Standards	PM10	Particulate Matter equal to or less than 10 microns in diameter
NESHAP	National Emission Standard for		Particulate Matter equal to or less than 2.5
11201111	Hazardous Air Pollutants	PM2.5	microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonable Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO ₂	Sulfur Dioxide
SCR	Selective Catalytic Reduction	TAC	Toxic Air Contaminant
SNCR	Selective Non-Catalytic Reduction	Temp	Temperature
SRN	State Registration Number	THC	Total Hydrocarbons
TEQ	Toxicity Equivalence Quotient	tpy	Tons per year
USEPA/EPA	United States Environmental Protection	μg	Microgram
	Agency	μm	Micrometer or Micron
VE	Visible Emissions	VOC	Volatile Organic Compounds
		yr	Year

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

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 Environmental Quality, 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 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 R 336.1219 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 R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. (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 R 336.1301, 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 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 R 336.1370(2). (R 336.1370)
- 13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. (R 336.2001)

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 (Process Equipment & Control Devices)	Flexible Group ID
EULOADRACK	Two bay loading rack with a carbon adsorption vapor recovery unit (VRU) as primary control and a portable vapor combustion unit (VCU) as back-up control.	NA
EUT120-7	120,000 barrel (approximately 5,040,000 gallons) internal floating roof storage tank for storing gasoline, distillate, or transmix. The tank was built in September of 1994.	FGIFRTANKS
EUT30-13	25,177 barrel (approximately 1,057,000 gallons) internal floating roof storage tank for storing gasoline, distillate, or transmix. The tank was built in 1979.	FGIFRTANKS
EUT20-1	20,927 barrel (approximately 879,000 gallons) internal floating roof storage tank for storing gasoline, distillate, or transmix. The tank was built in 1974.	FGIFRTANKS
EUT25-12	21,100 barrel (approximately 886,000 gallons) internal floating roof storage tank for storing gasoline, distillate, or transmix. The tank was built in 1979.	FGIFRTANKS
EUT-3	2000 barrel (approximately 84,000 gallons) internal floating roof storage tank for storing transmix. The tank was built in 1992.	FGIFRTANKS
EUT20-2	20,000 barrel (approximately 840,000 gallons) fixed roof storage tank for storing distillate. The tank was built in 1977.	FGFIXEDROOFTANKS
EURA-17-1	16,000 gallon fixed roof storage tank for storing distillate.	FGFIXEDROOFTANKS
EUO-30-1	29,400 gallon fixed roof storage tank for storing ethanol.	FGFIXEDROOFTANKS
EUO-30-2	29,400 gallon fixed roof storage tank for storing ethanol.	FGFIXEDROOFTANKS
EUO-30-3	29,400 gallon fixed roof storage tank for storing ethanol.	FGFIXEDROOFTANKS
EUO-30-4	29,400 gallon fixed roof storage tank for storing ethanol.	FGFIXEDROOFTANKS
EUO-30-5	29,400 gallon fixed roof storage tank for storing ethanol.	FGFIXEDROOFTANKS
EUO-30-6	29,400 gallon fixed roof storage tank for storing ethanol.	FGFIXEDROOFTANKS
EUAA-1-3	350 gallon additive tank.	FGFIXEDROOFTANKS
EUAA-8-2	8,000 gallon additive tank.	FGFIXEDROOFTANKS
EUAA-10-1	10,000 gallon additive tank.	FGFIXEDROOFTANKS

The following conditions apply to: EULOADRACK

DESCRIPTION: Two bay loading rack with a carbon adsorption vapor recovery unit (VRU) as primary control and a portable vapor combustion unit (VCU) as back-up control.

Flexible Group ID: FGFACILITY

POLLUTION CONTROL EQUIPMENT: Carbon adsorption VRU or a portable VCU (enclosed flare referred to as a RANE unit) as back-up.

I. <u>EMISSION LIMITS</u>

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	9 tpy	12-month rolling time period as determined at the end of each calendar month	EULOADRACK fugitive emissions	SC VI.4	R 336.1702(a)
2. VOC	60 tpy	12-month rolling time period as determined at the end of each calendar month	EULOADRACK emissions via the vapor recovery unit	SC VI.2, SC VI.4	R 336.1702(a)
3. VOC	60 mg/liter of organic compounds loaded	Continuously	EULOADRACK emissions via the VRU	SC V.1, SC VI.2, SC VI.4	R 336.1609, R 336.1627, 40 CFR 60.502
4. VOC	35 mg/liter of organic compounds loaded	Continuously	EULOADRACK emissions via the portable VCU	SC V.1, SC VI.4	R 336.1609, R 336.1627, 40 CFR 60.502

II. MATERIAL LIMITS

- 1. The EU-LOADRACK throughput shall not exceed the following: (R 336.1205(1)(a) and (3), R 336.1225)
 - a. 240,000,000 gallons per 12-month rolling time period, as determined at the end of each calendar month, of gasoline, gasoline mixed with ethanol, gasoline additive, and transmix combined.
 - b. 75,000,000 gallons per 12-month rolling time period, as determined at the end of each calendar month, of distillate and distillate additive combined.
 - c. 25,000,000 gallons per 12-month rolling time period, as determined at the end of each calendar month, of unblended ethanol.

III. PROCESS/OPERATIONAL RESTRICTIONS

- 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 R 336.1609 are met. The provisions include, but are not limited to filling the delivery vessel by a submerged fill pipe, and the following, which apply if the loading facility is located in any area listed in Table 61-a of R 336.1606: (R 336.1205(3), R 336.1609, R 336.1910)
 - 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))
 - b. The delivery vessel shall be equipped maintained, or controlled with all of the following: (R 336.1609(3))
 - 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 and shall post the procedures in an accessible, conspicuous location near the loading device. (R 336.1609(4))
- 2. The permittee shall not load any delivery vessel subject to control unless all applicable provisions of R 336.1627 are met. The provisions include, but are not limited to the following: (R 336.1627, R 336.1910)
 - a. There shall be no gas detector reading greater than or equal to 100% of the lower explosive limit at a distance of one inch from the location of the potential leak in the vapor collection system. Leaks shall be detected by a combustible gas detector using the test procedure described in R 336.2005. (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))
- 3. The permittee shall comply with the provisions in 40 CFR 60 Subpart XX, as follows:
 - a. EULOADRACK shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading. (40 CFR 60.502(a))
 - b. Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack. (40 CFR 60.502(d))
 - c. Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the procedures found in 40 CFR 60.502(e). **(40 CFR 60.502(e))**
 - d. The permittee shall act to assure that gasoline will be loaded only into gasoline tank trucks equipped with vapor collection equipment that is compatible with the permittee's vapor collection system. (40 CFR 60.502(f))
 - e. The permittee shall act to assure that the vapor collection system is connected during each loading of a gasoline tank truck, including training drivers in the hookup procedures and posting visible reminder signs. (40 CFR 60.502(g))
 - f. The permittee shall design and operate the vapor collection and liquid loading equipment to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in 40 CFR 60.503(d). (40 CFR 60.502(h))
 - g. No pressure-vacuum vent in the vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water). **(40 CFR 60.502(i))**

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- 4. The permittee shall not operate EULOADRACK 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, the plan shall include:
 - a. Identification of the equipment and 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 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.

If the malfunction abatement/preventative maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the plan within 45 days after such an event occurs and submit the revised plan for approval to the AQD District Supervisor. Should the AQD determine the malfunction abatement/preventative maintenance plan to be inadequate, the AQD District Supervisor may request modification of the plan to address those inadequacies. (R 336.1702(a), R 336.1910, R 336.1911)

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

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

1. The Department may require the owner or operator of any vapor collection system subject to the provisions of R 336.1627(6) to test the system in accordance with R 336.2005. The tests shall be conducted within 60 days following receipt of written notification from the department. Notification of the exact time and location of the test shall be given to the department, in writing, not less than seven days before the actual test. Documentation of the test that states the date and location of the test, test procedures, the type of equipment used, and the results of the test shall be submitted to the department within 60 days following the last date of the test. If the time or location of the test changes for any reason, then the owner or operator shall notify the department as soon as practical. (R 336.1627(10), R 336.2001, R 336.2003, R 336.2004, R 336.2005, 40 CFR 60.503)

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall complete all required records and calculations in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. (R 336.1205(1)(a) and (3), R 336.1225, R 336.1702(a), 40 CFR 60, Subpart XX)
- 2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner device(s) to monitor and record the VOC emissions of the exhaust gas from the VRU portion of EULOADRACK on a continuous basis. The permittee shall install and operate the CEM system to meet the timelines, requirements and reporting detailed in 40 CFR Part 60, Appendices B and F. (R 336.1205(3), R 336.1702(a), 40 CFR 60, Subpart XX)
- 3. The permittee shall keep records of the EULOADRACK throughput of each specific product for each calendar month and 12-month rolling time period. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(1)(a) and (3), R 336.1225)

- 4. The permittee shall keep the following information on a monthly and 12-month rolling time period basis for EULOADRACK:
 - a. Controlled VOC emission calculations.
 - b. Fugitive VOC emission calculations using an emission factor based on current gasoline distribution facilities loading rack collection system emission factors.
 - c. Miscellaneous VOC emission calculations from pumps, valves, and fittings based on current gasoline distribution facilities emission factors.

The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(3), R 336.1702(a))

- 5. The permittee shall keep on a monthly basis records of the following:
 - a. Part replacements, repairs and maintenance for the loading rack control device as specified in the malfunction abatement/preventative maintenance plan.
 - b. All control device malfunctions or failures.

The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1702(a), R 336.1910, R 336.1911)

- 6. The permittee shall keep records of emissions and operating information to comply with the federal Standards of Performance for New Stationary sources as specified in 40 CFR 60, Subpart XX. The provisions of 40 CFR 60, Subpart XX include, but are not limited to the following:
 - a. The tank truck vapor tightness documentation required under 40 CFR 60.502(e)(1) shall be kept on file at the terminal in a permanent form available for inspection. (40 CFR 60.505(a))
 - b. The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, as a minimum, the following information: (40 CFR 60.505(b))
 - i. Test title: Gasoline Delivery Tank Pressure Test—EPA Reference Method 27.
 - ii. Tank owner and address.
 - iii. Tank identification number.
 - iv. Testing location.
 - v. Date of test.
 - vi. Tester name and signature.
 - vii. Witnessing inspector, if any: Name, signature, and affiliation.
 - viii. Test results: Actual pressure change in five minutes, mm of water (average for two runs).
 - c. A record of each monthly leak inspection required under 40 CFR 60.502(j). Inspection records shall include, as a minimum, the following information: **(40 CFR 60.505(c))**
 - i. Date of inspection.
 - ii. Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).
 - iii. Leak determination method.
 - iv. Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).
 - v. Inspector name and signature.
 - d. The terminal owner or operator shall keep documentation of all notifications to owners or operators of non-vapor tight gasoline tank trucks loaded at the terminal, as required under 40 CFR 60.502(e)(4). (40 CFR 60.505(d))

- e. As an alternative to keeping records at the terminal of each gasoline cargo tank test result as required in 40 CFR 60.505(a), (c), and (d), the permittee may comply with the requirements in either 40 CFR 60.505(e)(1) or (2). (40 CFR 60.505(e))
 - i. An electronic copy of each record is instantly available at the terminal. The copy of each record is an exact duplicate image of the original paper record with certifying signatures. The permitting authority is notified in writing that each terminal using this alternative is in compliance with paragraph 40 CFR 60.505(e)(1). (40 CFR 60.505(e)(1))
 - ii. For facilities that utilize a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection by permitting authority representatives during the course of a site visit, or within a mutually agreeable time frame. The copy of each record is an exact duplicate image of the original paper record with certifying signatures. The permitting authority is notified in writing that each terminal using this alternative is in compliance with paragraph 40 CFR 60.505(e)(2). (40 CFR 60.505(e)(2))
- f. The permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system. (40 CFR 60.505(f))

The permittee shall keep all source emissions data and operating information on file and make them available to the Department upon request. (40 CFR 60 Subparts A and XX)

VII. REPORTING

1. The permittee shall provide notice in writing, of the date and duration that the portable VCU is to be on-site and in operation. The notice shall be provided 30 days in advance for scheduled maintenance, and within 24 hours for emergency or non-routine maintenance. (R 336.1201(7)(a))

VIII. STACK/VENT RESTRICTIONS

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

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-VRU1	10	18.8	R 336.1225, 40 CFR 52.21(c) and (d)
2. SV-VRU2	10	18.8	R 336.1225, 40 CFR 52.21(c) and (d)
3. SV-VCU	80	15	R 336.1225, 40 CFR 52.21(c) and (d)

IX. OTHER REQUIREMENTS

1. The permittee 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 XX, as they apply to EULOADRACK. (40 CFR 60, Subparts A and XX)

Footnotes

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

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
FGIFRTANKS	All storage tanks with internal floating roofs.	EU120-7
		EUT30-13
		EUT20-1
		EUT25-12
		EUT-3
FGFIXEDROOFTANKS	All storage tanks with fixed roofs.	EUT20-2
		EURA-17-1
		EUO-30-1
		EUO-30-2
		EUO-30-3
		EUO-30-4
		EUO-30-5
		EUO-30-6
		EUAA-1-3
		EUAA-8-2
		EUAA-10-1
FGFACILITY	All process equipment at the stationary source	NA
	including equipment covered by other permits,	
	grandfathered equipment and exempt equipment.	

The following conditions apply to: FGIFRTANKS

DESCRIPTION: All storage tanks with internal floating roofs.

Emission Units: EUT120-7, EUT30-13, EUT20-1, EUT25-12, EUT-3

POLLUTION CONTROL EQUIPMENT: Internal floating roofs

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	17 tpy	12-month rolling time period as determined at the end of each calendar month	FGIFRTANKS	SC VI.3, SC VI.4	R 336.1702(a)

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

- 1. The permittee shall not operate any FGIFRTANKS stationary vessel unless all provisions of R 336.1604 are met. The provisions include, but are not limited to the following: (R 336.1604, R 336.1910)
 - a. 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 vessel wall. The seal or any seal fabric shall not have visible holes, tears, or other nonfunctional openings. (R 336.1604(1)(b))
 - b. 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: (R 336.1604(2))
 - i. The cover, lid, or seal is in the closed position at all times, except when in actual use.
 - ii. Automatic bleeder vents are closed at all times, except when the roof is floated off, or landed on, the roof leg supports.
 - iii. Rim vents, if provided, are set at the manufacturer's recommended setting or are set to open when the roof is being floated off the roof leg supports.
- 2. The provisions of 40 CFR 60 Subpart Ka include, but are not limited to equipping EUT30-13 and EUT25-12 with an internal floating type cover as follows:
 - a. A continuous closure device between the tank wall and the cover edge. The cover is to be floating at all times, (i.e., off the leg supports) except during initial fill and when the tank is completely emptied and subsequently refilled. The process of emptying and refilling when the cover is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible. (40 CFR 60.112a(a)(2))
 - b. Each opening in the cover except for automatic bleeder vents and the rim space vents is to provide a projection below the liquid surface. (40 CFR 60.112a(a)(2))
 - c. Each opening in the cover except for automatic bleeder vents, rim space vents, stub drains and leg sleeves is to be equipped with a cover, seal, or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. (40 CFR 60.112a(a)(2))
 - d. Automatic bleeder vents are to be closed at all times when the cover is floating except when the cover is being floated off or is being landed on the leg supports. (40 CFR 60.112a(a)(2))
 - e. Rim vents are to be set to open only when the cover is being floated off the leg supports or at the manufacturer's recommended setting. (40 CFR 60.112a(a)(2))

- 3. The provisions of 40 CFR 60 Subpart Kb include, but are not limited to equipping EUT120-7 and EUT-3 as follows:
 - a. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. (40 CFR 60.112b(a)(1)(i))
 - b. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: (40 CFR 60.112b(a)(1)(ii))
 - i. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
 - ii. Two 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. The lower seal may be vapor-mounted, but both must be continuous.
 - iii. A mechanical shoe seal. A mechanical shoe seal is a 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. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
 - c. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface. (40 CFR 60.112b(a)(1)(iii))
 - d. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. (40 CFR 60.112b(a)(1)(iv))
 - e. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. (40 CFR 60.112b(a)(1)(v))
 - f. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. (40 CFR 60.112b(a)(1)(vi))
 - g. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. (40 CFR 60.112b(a)(1)(vii))
 - h. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. (40 CFR 60.112b(a)(1)(viii))
 - i. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. (40 CFR 60.112b(a)(1)(ix))

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IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall equip and maintain the storage tanks with the deck and seal configuration listed in the following table, or a deck and seal configuration that results in the same or lower VOC emissions from the tank.

Equipment	Deck Type	Primary Seal	Secondary Seal	Applicable Requirement
a. EUT120-7	Welded	Mechanical	None	R 336.1702(a), R 336.1910
		Shoe		
b. EUT30-13	Bolted	Mechanical	None	R 336.1702(a), R 336.1910
		Shoe		
c. EUT20-1	Welded	Mechanical	None	R 336.1702(a), R 336.1910
		Shoe		
d. EUT25-12	Bolted	Mechanical	None	R 336.1702(a), R 336.1910
		Shoe		
e. EUT-3	Welded	Mechanical	None	R 336.1225, R 336.1702(a),
		Shoe		R 336.1910

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 complete all required records and calculations in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. (R 336.1205(3), R 336.1702(a))
- 2. The permittee shall perform inspections and monitor operating information for EUT120-7 and EUT-3 in accordance with 40 CFR 60 Subpart Kb. The provisions include, but are not limited to the following:
 - a. Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel. (40 CFR 60.113b(a)(1))
 - b. For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12-months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in 40 CFR 60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. (40 CFR 60.113b(a)(2))
 - c. For vessels equipped with a double-seal system as specified in 40 CFR 60.112b(a)(1)(ii)(B): **(40 CFR 60.113b(a)(3))**
 - i. Visually inspect the vessel as specified in 40 CFR 60.113b(a)(4) at least every five years; or
 - ii. Visually inspect the vessel as specified in 40 CFR 60.113b(a)(2).

- d. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than ten percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than ten years in the case of vessels conducting the annual visual inspection as specified in 40 CFR 60.113b(a)(2) and 40 CFR 60.113b(a)(3)(ii) and at intervals no greater than 5 years in the case of vessels specified in 40 CFR 60.113b(a)(3)(i). (40 CFR 60.113b(a)(4))
- 3. The permittee shall keep records of the throughput for each FGIFRTANKS tank of each specific petroleum product for each calendar month and 12-month rolling time period. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(3), R 336.1702(a))
- 4. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of VOC emission calculations for FGIFRTANKS. The permittee shall keep all records on and make them available to the Department upon request. (R 336.1205(3), R 336.1702(a))

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

- 1. The permittee 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 K, as they apply to EUT20-1. (40 CFR 60, Subparts A and K)
- The permittee 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 Ka, as they apply to EUT30-13 and EUT25-12. (40 CFR 60, Subparts A and Ka)
- 3. The permittee 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 EUT120-7 and EUT-3. (40 CFR 60, Subparts A and Kb)

Footnotes:

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

The following conditions apply to: FGFIXEDROOFTANKS

DESCRIPTION: All storage tanks with fixed roofs.

Emission Units: EUT20-2, EURA-17-1, EUO-30-1, EUO-30-2, EUO-30-3, EUO-30-4, EUO-30-5, EUO-30-6,

EUAA-1-3, EUAA-8-2, EUAA-10-1

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	3 tpy	12-month rolling time period as determined at the end of each calendar month.	FGIFRTANKS	SC VI.2, SC VI.3	R 336.1702(a)

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall equip and maintain each tank in FGFIXEDROOFTANKS with conservation vents. (R 336.1702(a))

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

- The permittee shall complete all required records and calculations in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. (R 336.1205(3), R 336.1702(a))
- 2. The permittee shall keep records of the throughput for each FGFIXEDROOFTANKS tank of each specific product for each calendar month and 12-month rolling time period. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(3), R 336.1702(a))

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- 3. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of VOC emission calculations for FGFIXEDROOFTANKS. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(3), R 336.1702(a))
- 4. The permittee shall keep records of inspections and operating information for EUT20-2 in accordance with 40 CFR 60 Subpart K. for storage vessels storing petroleum liquids with a Reid vapor pressure of more than 6.9 kPa (1.0 psia) and storage vessels not equipped with a vapor recovery and return or disposal system:
 - a. Maintain a record of the petroleum liquid stored, (40 CFR 60.113)
 - b. The period of storage, (40 CFR 60.113)
 - c. The maximum true vapor pressure of that liquid during the respective storage period. (40 CFR 60.113)

The permittee shall keep all records on file and make them available to the Department upon request. (40 CFR 60 Subpart K)

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

1. The permittee 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 K, as they apply to EUT20-2. **(40 CFR 60, Subparts A and K)**

Footnotes:

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

The following conditions apply Source-Wide to: FGFACILITY

<u>DESCRIPTION:</u> All process equipment at the stationary source including equipment covered by other permits,

grandfathered equipment and exempt equipment.

Emission Units: NA

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Each Individual HAP	Less than 9.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
2. Aggregate HAPs	Less than 22.5 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
3. VOC	Less than 90.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.3	R 336.1205(3)

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

1. The permittee shall determine the HAP content of any material as received and as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. (R 336.1205(3))

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall complete all required records and calculations in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. (R336.1205(3))
- 2. The permittee shall keep the following information on a monthly basis for FGFACILITY:
 - a. Volume or mass of each HAP containing material processed.
 - b. HAP content, or emission factor for each HAP containing material.
 - c. Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
 - d. Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(3))

- 3. The permittee shall keep the following information on a monthly basis for FGFACILITY:
 - a. Volume or mass of each VOC containing material processed.
 - b. VOC content, or emission factor for each VOC containing material.
 - c. VOC emission calculations determining the monthly emission rate in tons per calendar month.
 - d. VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(3))

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

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