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August 25, 2020

Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division – Detroit District
AQD District Supervisor
Cadillac Place, Suite 2-300
3058 West Grand Blvd
Detroit, MI 48202

Re: Buckeye Terminals, LLC – River Rouge Terminal
205 Marion Avenue, River Rouge, Michigan
Renewable Operating Permit MI-ROP-B2987-2016

AQD District Supervisor;

On behalf of Buckeye Terminals, LLC (Buckeye), Envirospec Engineering, PLLC is submitting this application for a permit renewal pursuant to R 336.1210(7). The facility is a stationary bulk petroleum storage and transfer terminal located at 205 Marion Avenue, River Rouge, Michigan, and currently operates under Renewable Operating Permit (ROP) MI-ROP-B2987-2016, issued March 1, 2016.

Buckeye is enclosing the following as part of the renewal application:

- o ROP Application Form
- o ROP mark-up (Microsoft Word version)
- o Supplemental Data
 - PTI
 - PTI
- o Plans referenced in the ROP:
 - Malfunction Abatement Plan

The completed application has also been submitted electronically to EGLE-ROP@michigan.gov.

Should you have any questions please feel free to contact me at (518) 453-2203 or Kim Trostel of Buckeye at (419) 993-8003.

Sincerely,

Nicole Brower

Nicole Brower
Senior Engineer
Envirospec Engineering PLLC

cc: Kim Trostel – Buckeye
Paul Ransom – Buckeye
Dennis Coleman – Buckeye



RENEWABLE OPERATING PERMIT RENEWAL APPLICATION FORM

This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to instructions for additional information to complete the Renewable Operating Permit Renewal Application Form.

GENERAL INSTRUCTIONS

This application form should be submitted as part of an administratively complete application package for renewal of a Renewable Operating Permit (ROP). This application form consists of nine parts. Parts A – H must be completed for all applications and must also be completed for each section of a sectioned ROP. Answer all questions in all parts of the form unless directed otherwise. Detailed instructions for this application form can be found at <http://michigan.gov/air> (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates").

PART A: GENERAL INFORMATION

Enter information about the source, owner, contact person and the responsible official.

SOURCE INFORMATION

SRN B2987	SIC Code 4226	NAICS Code 493190	Existing ROP Number MI-ROP-B2987-2016	Section Number (if applicable)
Source Name Buckeye Terminals, LLC				
Street Address 205 Marion Ave				
City River Rouge		State MI	ZIP Code 48218	County Wayne
Section/Town/Range (if address not available)				
Source Description Bulk Petroleum Storage and Marketing Facility				
<input type="checkbox"/> Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP.				

OWNER INFORMATION

Owner Name Buckeye Terminals, LLC	Section Number (if applicable)			
Mailing address (<input checked="" type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country

Check here if any information in this ROP renewal application is confidential. Confidential information should be identified on an Additional Information (AI-001) Form.

PART A: GENERAL INFORMATION (continued)

At least one contact and responsible official must be identified. Additional contacts and responsible officials may be included if necessary.

CONTACT INFORMATION

Contact 1 Name Dennis Coleman		Title Terminal Specialist II		
Company Name & Mailing address (<input checked="" type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number 313-842-2114 x306		E-mail address DAColeman@buckeye.com		

Contact 2 Name (optional) Kimberly Trostel		Title Sr Specialist, Air Compliance		
Company Name & Mailing address (<input type="checkbox"/> check if same as source address) Buckeye Partners, LP, 940 Buckeye Road				
City Lima	State OH	ZIP Code 45804	County Allen	Country US
Phone number 419-993-8003		E-mail address KTrostel@buckeye.com		

RESPONSIBLE OFFICIAL INFORMATION

Responsible Official 1 Name Paul Ransom		Title Operations Manager		
Company Name & Mailing address (<input checked="" type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number 484-951-4049		E-mail address PRansom@Buckeye.com		

Responsible Official 2 Name (optional)		Title		
Company Name & Mailing address (<input type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		

<input type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part A. Enter AI-001 Form ID:

PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official

Identify the items that are included as part of your administratively complete application in the checklist below. For your application to be complete, it must include information necessary to evaluate the source and to determine all applicable requirements. Answer the compliance statements as they pertain to all the applicable requirements to which the source is subject. The source's Responsible Official must sign and date this form.

Listing of ROP Application Contents. Check the box for the items included with your application.

<input checked="" type="checkbox"/> Completed ROP Renewal Application Form (and any AI-001 Forms) (required)	<input type="checkbox"/> Compliance Plan/Schedule of Compliance
<input checked="" type="checkbox"/> Mark-up copy of existing ROP using official version from the AQD website (required)	<input type="checkbox"/> Stack information
<input checked="" type="checkbox"/> Copies of all Permit(s) to Install (PTIs) that have not been incorporated into existing ROP (required)	<input type="checkbox"/> Acid Rain Permit Initial/Renewal Application
<input type="checkbox"/> Criteria Pollutant/Hazardous Air Pollutant (HAP) Potential to Emit Calculations	<input type="checkbox"/> Cross-State Air Pollution Rule (CSAPR) Information
<input type="checkbox"/> MAERS Forms (to report emissions not previously submitted)	<input type="checkbox"/> Confidential Information
<input type="checkbox"/> Copies of all Consent Order/Consent Judgments that have not been incorporated into existing ROP	<input checked="" type="checkbox"/> Paper copy of all documentation provided (required)
<input type="checkbox"/> Compliance Assurance Monitoring (CAM) Plan	<input checked="" type="checkbox"/> Electronic documents provided (optional)
<input checked="" type="checkbox"/> Other Plans (e.g., Malfunction Abatement, Fugitive Dust, Operation and Maintenance, etc.)	<input type="checkbox"/> Other, explain:

Compliance Statement

This source is in compliance with **all** of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP. Yes No

This source will continue to be in compliance with all of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP. Yes No

This source will meet in a timely manner applicable requirements that become effective during the permit term. Yes No

The method(s) used to determine compliance for each applicable requirement is/are the method(s) specified in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and all other applicable requirements not currently contained in the existing ROP.

If any of the above are checked No, identify the emission unit(s) or flexible group(s) affected and the specific condition number(s) or applicable requirement for which the source is or will be out of compliance at the time of issuance of the ROP renewal on an AI-001 Form. Provide a compliance plan and schedule of compliance on an AI-001 Form.

Name and Title of the Responsible Official (Print or Type)

Paul Ransom – Operations Manager

As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.



Signature of Responsible Official

08/17/20

Date

PART C: SOURCE REQUIREMENT INFORMATION

Answer the questions below for specific requirements or programs to which the source may be subject.

C1.	Actual emissions and associated data from all emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have not been reported in MAERS for the most recent emissions reporting year? If Yes , identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C2.	Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C3.	Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68) If Yes , a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C4.	Has this stationary source added or modified equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NO _x , PM ₁₀ , PM _{2.5} , SO ₂ , VOC, lead) emissions? If Yes , include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. If No , criteria pollutant potential emission calculations do not need to be included.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C5.	Has this stationary source added or modified equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act? If Yes , include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions must be included in HAP emission calculations. If No , HAP potential emission calculations do not need to be included.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C6.	Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If Yes , identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C7.	Are any emission units subject to the federal Acid Rain Program? If Yes , identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form. Is an Acid Rain Permit Renewal Application included with this application?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C8.	Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If Yes , identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to EGLE, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy. Is a CAM plan included with this application? If a CAM Plan is included, check the type of proposed monitoring included in the Plan: 1. Monitoring proposed by the source based on performance of the control device, or 2. Presumptively Acceptable Monitoring, if eligible	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <input type="checkbox"/>
C9.	Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement? If Yes , then a copy must be submitted as part of the ROP renewal application.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C10.	Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If Yes , then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input checked="" type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: AI-PARTC		



RENEWABLE OPERATING PERMIT APPLICATION AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

SRN: B2987

Section Number (if applicable):

1. Additional Information ID
AI-PARTC

Additional Information

2. Is This Information Confidential?

Yes No

**New emission calculations were provided for EUTANK16 with the application for PTI 100-17.
No other emission changes have been proposed.**

Page of

PART D: PERMIT TO INSTALL (PTI) EXEMPT EMISSION UNIT INFORMATION

Review all emission units at the source and answer the question below.

D1. Does the source have any emission units that do not appear in the existing ROP but are required to be listed in the ROP application under R 336.1212(4) (Rule 212(4)) of the Michigan Air Pollution Control Rules? If Yes, identify the emission units in the table below. Yes No

If No, go to Part E.

Note: Emission units that are subject to process specific emission limitations or standards, even if identified in Rule 212, must be captured in either Part G or H of this application form. Identical emission units may be grouped (e.g. PTI exempt Storage Tanks).

Emission Unit ID	Emission Unit Description	Rule 212(4) Citation [e.g. Rule 212(4)(c)]	Rule 201 Exemption Rule Citation [e.g. Rule 282(2)(b)(i)]
EUTANK54C	16,000 Gallon vertical fixed roof tank for wastewater storage.	R336.212(4)(c)	R336.1284(i)
EUTANK54B	13,500 Gallon vertical fixed roof tank for wastewater storage.	R336.212(4)(c)	R336.1284(i)
EUTANK54A	13,500 Gallon vertical fixed roof tank for wastewater storage.	R336.212(4)(c)	R336.1284(i)
EUTANK7	6,000 Gallon horizontal additive tank.	R336.212(4)(c)	R336.1284(i)
EUTANK83	549 Gallon tote for additive storage.	R336.212(4)(c)	R336.1284(i)
EUTANK83A	359 Gallon tote for additive storage.	R336.212(4)(c)	R336.1284(i)
EUTANK89	345 Gallon tote for additive storage.	R336.212(4)(c)	R336.1284(i)
EUTANK89A	549 Gallon tote for additive storage.	R336.212(4)(c)	R336.1284(i)
EUTANK89B	500 Gallon horizontal additive tank.	R336.212(4)(c)	R336.1284(i)
EUTANK90	550 Gallon horizontal additive tank.	R336.212(4)(c)	R336.1284(i)
EUTANK91	6,000 Gallon horizontal additive tank.	R336.212(4)(c)	R336.1284(i)
EUTANK92	2,500 Gallon horizontal additive tank.	R336.212(4)(c)	R336.1284(i)

Comments:

Check here if an AI-001 Form is attached to provide more information for Part D. Enter AI-001 Form ID: **AI-PARTD**

AI-PART-D

SRN: B2987 Section Number (if applicable):

Emission Unit ID	Emission Unit Description	Rule 201 Exemption [e.g. Rule 282(b)(i)]	Rule 212(4) Exemption [e.g. Rule 212(4)(b)]
EUTANK93	2,500 Gallon horizontal additive tank.	R336.212(4)(c)	R336.1284(i)
EUTANK79	6,000 Gallon horizontal additive tank.	R336.212(4)(c)	R336.1284(i)
EUICE1	4-Horsepower gasoline IC engine.	R336.212(4)(d)	R336.1285(g)
EUICE2	4-Horsepower gasoline IC engine.	R336.212(4)(d)	R336.1285(g)
EUICE3	15-Horsepower gasoline IC engine.	R336.212(4)(d)	R336.1285(g)
EUFURNACE1	90,000 BTU/hr natural gas furnace.	R336.212(4)(b)	R336.1282(b)(ii)
EUFURNACE2	120,000 BTU/hr natural gas furnace.	R336.212(4)(b)	R336.1282(b)(ii)
EUFURNACE3	90,000 BTU/hr natural gas furnace.	R336.212(4)(b)	R336.1282(b)(ii)

Comments:

Check here if an AI-001 form is attached to provide more information for Part D. Enter AI-001 form ID:

PART E: EXISTING ROP INFORMATION

Review all emission units and applicable requirements (including any source wide requirements) in the existing ROP and answer the questions below as they pertain to **all** emission units and **all** applicable requirements in the existing ROP.

E1. Does the source propose to make any additions, changes or deletions to terms, conditions and underlying applicable requirements as they appear in the existing ROP?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If <u>Yes</u> , identify changes and additions on Part F, Part G and/or Part H.	
E2. For each emission unit(s) identified in the existing ROP, <u>all</u> stacks with applicable requirements are to be reported in MAERS. Are there any stacks with applicable requirements for emission unit(s) identified in the existing ROP that were <u>not</u> reported in the most recent MAERS reporting year? If <u>Yes</u> , identify the stack(s) that was/were not reported on applicable MAERS form(s).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
E3. Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If <u>Yes</u> , complete Part F with the appropriate information.	
E4. Have any emission units identified in the existing ROP been dismantled? If <u>Yes</u> , identify the emission unit(s) and the dismantle date in the comment area below or on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Comments:	
<input type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part E. Enter AI-001 Form ID: AI-	

PART F: PERMIT TO INSTALL (PTI) INFORMATION

Review all emission units and applicable requirements at the source and answer the following questions as they pertain to all emission units with PTIs. Any PTI(s) identified below must be attached to the application.

F1. Has the source obtained any PTIs where the applicable requirements from the PTI have not been incorporated into the existing ROP? If Yes, complete the following table. Yes No
If No, go to Part G.

Permit to Install Number	Emission Units/Flexible Group ID(s)	Description (Include Process Equipment, Control Devices and Monitoring Devices)	Date Emission Unit was Installed/ Modified/ Reconstructed
6-18	FGGASNPS	Added language for when tanks in this group are storing N/A products, such as distillate.	N/A
100-17	EUTANK16, FGGASNPS, FGGASTANKS	Added EUTANK16 to FGGASNPS for Ethanol Storage.	9/1/2017

F2. Do any of the PTIs listed above change, add, or delete terms/conditions to **established emission units** in the existing ROP? If Yes, identify the emission unit(s) or flexible group(s) affected in the comments area below or on an AI-001 Form and identify all changes, additions, and deletions in a mark-up of the existing ROP. Yes No

F3. Do any of the PTIs listed above identify **new emission units** that need to be incorporated into the ROP? If Yes, submit the PTIs as part of the ROP renewal application on an AI-001 Form, and include the new emission unit(s) or flexible group(s) in the mark-up of the existing ROP. Yes No

F4. Are there any stacks with applicable requirements for emission unit(s) identified in the PTIs listed above that were not reported in MAERS for the most recent emissions reporting year? If Yes, identify the stack(s) that were not reported on the applicable MAERS form(s). Yes No

F5. Are there any proposed administrative changes to any of the emission unit names, descriptions or control devices in the PTIs listed above for any emission units not already incorporated into the ROP? If Yes, describe the changes on an AI-001 Form. Yes No

Comments:
PTI 100-17 modified terms/conditions for established emission units. Changes have been included in the mark-up of the existing ROP.

Check here if an AI-001 Form is attached to provide more information for Part F. Enter AI-001 Form ID: AI-

PART G: EMISSION UNITS MEETING THE CRITERIA OF RULES 281(2)(h), 285(2)(r)(iv), 287(2)(c), OR 290

Review all emission units and applicable requirements at the source and answer the following questions.

G1. Does the source have any new and/or existing emission units which do not already appear in the existing ROP and which meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290.
 If Yes, identify the emission units in the table below. If No, go to Part H. Yes No
Note: If several emission units were installed under the same rule above, provide a description of each and an installation/modification/reconstruction date for each.

Origin of Applicable Requirements	Emission Unit Description – Provide Emission Unit ID and a description of Process Equipment, Control Devices and Monitoring Devices	Date Emission Unit was Installed/ Modified/ Reconstructed
<input type="checkbox"/> Rule 281(2)(h) or 285(2)(r)(iv) cleaning operation		
<input type="checkbox"/> Rule 287(2)(c) surface coating line		
<input checked="" type="checkbox"/> Rule 290 process with limited emissions	Butane Tank	2012

Comments:
 A letter was submitted May 16, 2012.

Check here if an AI-001 Form is attached to provide more information for Part G. Enter AI-001 Form ID: AI-

PART H: REQUIREMENTS FOR ADDITION OR CHANGE

Complete this part of the application form for all proposed additions, changes or deletions to the existing ROP. This includes state or federal regulations that the source is subject to and that must be incorporated into the ROP or other proposed changes to the existing ROP. **Do not include additions or changes that have already been identified in Parts F or G of this application form.** If additional space is needed copy and complete an additional Part H.

Complete a separate Part H for each emission unit with proposed additions and/or changes.

H1. Are there changes that need to be incorporated into the ROP that have not been identified in Parts F and G? If <u>Yes</u> , answer the questions below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H2. Are there any proposed administrative changes to any of the existing emission unit names, descriptions or control devices in the ROP? If <u>Yes</u> , describe the changes in questions H8 – H16 below and in the affected Emission Unit Table(s) in the mark-up of the ROP.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H3. Does the source propose to add a new emission unit or flexible group to the ROP not previously identified in Parts F or G? If <u>Yes</u> , identify and describe the emission unit name, process description, control device(s), monitoring device(s) and applicable requirements in questions H8 – H16 below and in a new Emission Unit Table in the mark-up of the ROP. See instructions on how to incorporate a new emission unit/flexible group into the ROP.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H4. Does the source propose to add new state or federal regulations to the existing ROP? If <u>Yes</u> , on an AI-001 Form, identify each emission unit/flexible group that the new regulation applies to and identify <u>each</u> state or federal regulation that should be added. Also, describe the new requirements in questions H8 – H16 below and add the specific requirements to existing emission units/flexible groups in the mark-up of the ROP, create a new Emission Unit/Flexible Group Table, or add an AQD template table for the specific state or federal requirement.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H5. Has a Consent Order/Consent Judgment (CO/CJ) been issued where the requirements were not incorporated into the existing ROP? If <u>Yes</u> , list the CO/CJ number(s) below and add or change the conditions and underlying applicable requirements in the appropriate Emission Unit/Flexible Group Tables in the mark-up of the ROP.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H6. Does the source propose to add, change and/or delete source-wide requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H7. Are you proposing to streamline any requirements? If <u>Yes</u> , identify the streamlined and subsumed requirements and the EU ID, and provide a justification for streamlining the applicable requirement below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H8. Does the source propose to add, change and/or delete emission limit requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H9. Does the source propose to add, change and/or delete material limit requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H10. Does the source propose to add, change and/or delete process/operational restriction requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H11. Does the source propose to add, change and/or delete design/equipment parameter requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H12. Does the source propose to add, change and/or delete testing/sampling requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H13. Does the source propose to add, change and/or delete monitoring/recordkeeping requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H14. Does the source propose to add, change and/or delete reporting requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H15. Does the source propose to add, change and/or delete **stack/vent restrictions**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. Yes No

H16. Does the source propose to add, change and/or delete any **other** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. Yes No

H17. Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If Yes, identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below. Yes No

Check here if an AI-001 Form is attached to provide more information for Part H. Enter AI-001 Form ID: **AI-**

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

EFFECTIVE DATE: MARCH 1, 2016

ISSUED TO

BUCKEYE TERMINAL, LLC

State Registration Number (SRN): B2987

LOCATED AT

205 Marion Ave, River Rouge, Michigan 48218

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B2987-2016

Expiration Date: March 1, 2021

Administratively Complete ROP Renewal Application Due Between
September 1, 2019 and September 1, 2020

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Michigan Air Pollution Control Rule 210(1), this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-B2987-2016

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environmental Quality

Wilhemina McLemore, Detroit District Supervisor

TABLE OF CONTENTS

AUTHORITY AND ENFORCEABILITY	3
A. GENERAL CONDITIONS.....	4
Permit Enforceability	4
General Provisions.....	4
Equipment & Design	5
Emission Limits.....	5
Testing/Sampling	5
Monitoring/Recordkeeping	6
Certification & Reporting	6
Permit Shield	7
Revisions	8
Reopenings.....	8
Renewals	9
Stratospheric Ozone Protection	9
Risk Management Plan.....	9
Emission Trading	9
Permit To Install (PTI).....	10
B. SOURCE-WIDE CONDITIONS	11
C. EMISSION UNIT CONDITIONS	14
EMISSION UNIT SUMMARY TABLE	14
EUTANK57	16
EULOADRACK	18
D. FLEXIBLE GROUP CONDITIONS	2524
FLEXIBLE GROUP SUMMARY TABLE	2524
FGMACT6B	2625
FGGASNPS	2928
FGGASTANKS	3432
FGDISTANKS.....	3634
FGFIXEDROOFTANKS	3836
FGAIRSTRIPPERS.....	4038
FGRULE290	4341
E. NON-APPLICABLE REQUIREMENTS	4644
Appendix 1: Abbreviations and Acronyms.....	4745
Appendix 2. Schedule of Compliance.....	4846
Appendix 3. Monitoring Requirements	4846
Appendix 4. Recordkeeping	4846
Appendix 5. Testing Procedures	4846
Appendix 6. Permits to Install.....	4846
Appendix 7. Emission Calculations	4947
Appendix 8. Reporting	5048
Appendix 9. Site Plan.....	5149

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

AUTHORITY AND ENFORCEABILITY

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Environmental Quality (MDEQ) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a Source-Wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements are identified for each ROP term or condition. All terms and conditions that are included in a PTI are streamlined, subsumed and/or are state-only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. (R 336.1213(5))
- Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. (R 336.1213(5)(a), R 336.1214a(5))
- Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. (R 336.1213(5)(b), R 336.1214a(3))

General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA. (R 336.1213(1)(a))
2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. (R 336.1213(1)(b))
3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. (R 336.1213(1)(c))
4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities (R 336.1213(1)(d)):
 - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
 - c. Inspect, at reasonable times, any of the following:
 - i. Any stationary source.
 - ii. Any emission unit.
 - iii. Any equipment, including monitoring and air pollution control equipment.
 - iv. Any work practices or operations regulated or required under the ROP.
 - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. (R 336.1213(1)(e))

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. (R 336.1213(1)(f))
7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. (R 336.1213(1)(g))
8. This ROP does not convey any property rights or any exclusive privilege. (R 336.1213(1)(h))

Equipment & Design

9. Any 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).² (R 336.1370)
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. (R 336.1910)

Emission Limits

11. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following:"² (R 336.1301(1))
 - a. A 6-minute average of 20 % opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
 - b. A limit specified by an applicable federal new source performance standard.The grading of visible emissions shall be determined in accordance with Rule 303.
12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
 - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.¹ (R 336.1901(a))
 - b. Unreasonable interference with the comfortable enjoyment of life and property.¹ (R 336.1901(b))

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).² (R 336.2001)
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. (R 336.2001(2), R 336.2001(3), R 336.2003(1))
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. (R 336.2001(5))

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate. **(R 336.1213(3)(b))**
- The date, location, time, and method of sampling or measurements.
 - The dates the analyses of the samples were performed.
 - The company or entity that performed the analyses of the samples.
 - The analytical techniques or methods used.
 - The results of the analyses.
 - The related process operating conditions or parameters that existed at the time of sampling or measurement.
17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. **(R 336.1213(4)(c))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
- For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following **(R 336.1213(3)(c))**:
- Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
 - Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. 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 appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor 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 conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.² **(R 336.1912)**

Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
- The applicable requirements are included and are specifically identified in the ROP.
 - The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.
- Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.
27. Nothing in this ROP shall alter or affect any of the following:
- The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
 - The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
 - The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

- d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. (R 336.1213(6)(b)(iv))
28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
- a. Operational flexibility changes made pursuant to Rule 215. (R 336.1215(5))
 - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). (R 336.1216(1)(b)(iii))
 - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. (R 336.1216(1)(c)(iii))
 - d. Minor Permit Modifications made pursuant to Rule 216(2). (R 336.1216(2)(f))
 - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. (R 336.1216(4)(e))
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. (R 336.1217(1)(c), R 336.1217(1)(a))

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. (R 336.1215, R 336.1216)
31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). (R 336.1219(2))
32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. (R 336.1210(10))
33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. (R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))

Reopenings

34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
- a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. (R 336.1217(2)(a)(i))
 - b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. (R 336.1217(2)(a)(ii))
 - c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. (R 336.1217(2)(a)(iii))
 - d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. (R 336.1217(2)(a)(iv))

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. (R 336.1210(8))

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.
37. If the permittee is subject to 40 CFR Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 68.10(a):
- June 21, 1999,
 - Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
 - The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c). (40 CFR Part 68)

Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. (R 336.1213(12))

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² (R 336.1201(1))
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² (R 336.1201(8), Section 5510 of Act 451)
45. The terms and conditions of a PTI 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 the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI 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. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ.² (R 336.1219)
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² (R 336.1201(4))

Footnotes:

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

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

B. SOURCE-WIDE CONDITIONS

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

SOURCE-WIDE CONDITIONS

POLLUTION CONTROL EQUIPMENT

Vapor recovery system serving the truck loading rack

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall comply with all provisions of the National Emissions Standards for Hazardous Air Pollutants as specified in 40 CFR Part 61 Subpart M for Asbestos when conducting applicable renovation or demolition activities at the facility. (40 CFR Part 61, Subpart M)
2. The permittee shall notify the Department if a change in land use occurs for property classified as industrial or as a public roadway, where this classification was relied upon to demonstrate compliance with Rule 225(1). The notification shall be submitted to the AQD District Supervisor, within 30 days of the actual land use change. Within 60 days of the land use change, the permittee shall submit to the AQD District Supervisor a plan for complying with the requirements of Rule 225(1). The plan shall require compliance with 225(1) no later than one year after the due date of the plan submittal.² (R 336.1225(4))

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R336.1213(3)(b)(ii))

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R336.1213(3)(b)(ii))

NA

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. A facility for which the results, E_T , of the calculation in paragraph (a)(1) of §63.420 has been documented and is less than 0.50, is exempt from the requirements of 40 CFR Part 63, Subpart R, except that the permittee shall:
 - a. Operate the facility such that none of the facility parameters used to calculate results under paragraph (a)(1) of §63.420 is exceeded in any rolling 30-day period; and
 - b. Maintain records and provide reports in accordance with the provisions of §63.428(j). **(40 CFR 63.420(d))**
2. The permittee shall maintain a record of the calculations required in §63.420 (a)(1), including methods, procedures, and assumptions supporting the calculations for determining criteria in §63.420(d).
(40 CFR 63.428(j)(2))
3. At any time following the notification required under paragraph (j)(1) of §63.428, and prior to any of the parameters being exceeded, the permittee may notify the Administrator and the AQD District Supervisor of modifications to the facility parameters. Each such notification shall document any expected HAP emission change resulting from the change in parameter.
(40 CFR 63.428(j)(3)), (R 336.1213(3))
4. The permittee shall comply with all applicable provisions of Rules 605, 607, 609 and 627.
(R 336.1605), (R 336.1606), (R 336.1609), (R 336.1627)

Footnotes:

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

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

C. EMISSION UNIT CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

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))	Installation Date/ Modification Date	Flexible Group ID
EUTANK57	Tank 57- 3,208,000 gallons vertical tank with fixed roof for storage of distillate fuel oil	11/1/1993	NA
EULOADRACK	Seven Bay tank truck loading rack for petroleum products with vapor recovery or vapor combustion system controls.	1/1/1923	FGMACT6B
EUTANK12	Tank 12- 2,863,000 gallons tank with internal floating roof control, <u>storing either gasoline, gasoline/ethanol blends, or diesel. (from PTI 6-18):</u>	1/1/1994	FGMACT6B, FGGASNSPS
EUTANK22	Tank 22- 3,526,000 gallons tank with internal floating roof control, <u>storing either gasoline, gasoline/ethanol blends, or diesel. (from PTI 6-18)</u>	1/1/1992	FGMACT6B, FGGASNSPS
EUTANK56	Tank 56- 1,355,000 gallons tank with internal floating roof control, <u>storing either gasoline, gasoline/ethanol blends, or diesel. (from PTI 6-18):</u>	1/1/1993	FGMACT6B, FGGASNSPS
EUTANK15	Tank 15- 2,922,000 gallons tank with internal floating roof control.	1/1/1928	FGMACT6B, FGGASTANKS
EUTANK16	Tank 16- 2,968,000 gallons tank with internal floating roof control.	1/1/1928 <u>9/1/2017 (from PTI 100-17)</u>	FGMACT6B, <u>FGGASTANKSFGGASNS PS (from PTI 100-17)</u>
EUTANK17	Tank 17- 2,960,000 gallons tank with internal floating roof control.	1/1/1928	FGMACT6B, FGGASTANKS
EUTANK18	Tank 18- 2,241,000 gallons tank with external floating roof tank and weather cover	1/1/1928	FGMACT6B, FGGASTANKS
EUTANK20	Tank 20- 2,776,000 gallons tank with external floating roof tank and weather cover	1/1/1928	FGMACT6B, FGGASTANKS
EUTANK23	Tank 23- 2,945,000 gallons tank with external floating roof tank and weather cover	1/1/1929	FGMACT6B, FGGASTANKS
EUTANK14	Tank 14- 2,789,000 gallons tank with internal floating roof control.	1/1/1928	FGGASTANKS
EUTANK24	Tank 24- 374,000 gallons tank with internal floating roof control	1/1/1933	FGGASTANKS

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUTANK25	Tank 25- 131,000 gallons tank with internal floating roof control	1/1/1949	FGGASTANKS
EUTANK13	Tank 13- 2,884,000 gallons vertical tank with fixed roof.	1/1/1924	FGDISTTANKS
EUTANK21	Tank 21- 3,179,000 gallons vertical tank with fixed roof.	1/1/1928	FGDISTTANKS
EUTANK8	Tank 8- 2,000 gallons horizontal tank with fixed roof control for waste water petroleum products storage	1/1/1979	FGFIXEDROOFTANKS
EUTANK52	Tank 52- 9,000 gallons vertical tank with fixed roof control for waste water petroleum products storage	1/1/1979	FGFIXEDROOFTANKS
EUTANK53	Tank 53- 9,000 gallons vertical tank with fixed roof control for waste water petroleum products storage	1/1/1979	FGFIXEDROOFTANKS
EUAIRSTRIPPER	Groundwater remediation system consisting of two air strippers and a SVE system with catalytic oxidizer (CATOX).	5/1/2000	FGAIRSTRIPPERS
EUBUTANE	117,905 gallon horizontal pressured butane storage tank	5/2012	FGRULE290

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

EUTANK57
EMISSION UNIT CONDITIONS

DESCRIPTION

A 3,208,000 gallons vertical fixed roof, identified as number 57, for storage of distillate fuel oil with contents of less than 3.5 kPa (0.5 psia) vapor pressure.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. After April 30, 1981, it is unlawful for a person to store any organic compound having a true vapor pressure of more than 1.5 psia, but less than 11 psia, at actual storage conditions in any existing fixed roof stationary vessel of more than 40,000-gallon capacity. (R 336.1604(1))
2. The permittee shall store in EUTANK57 materials that have a true vapor pressure of 0.5 psia or less (condition accepted by the permittee to avoid becoming subject to 40 CFR 60, Subpart Kb). (R 336.1213(3))

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. Daily records of the vapor pressure of the contents of EUTANK57 shall be maintained to demonstrate compliance with the 0.5 psia maximum vapor pressure limitation. (R 336.1213(3))
2. Recordkeeping of the type and temperature of the stored material in the tank is a requirement equivalent to measuring true vapor pressure. The permittee shall calculate the vapor pressure using the equations and/or methods described in EPA's AP-42, Chapter 7.1, Storage of Organic Liquid, November 2006 edition. Vapor pressure may be determined by interpolating values in Table 7.1-2 of Chapter 7.1, using the maximum liquid storage temperature or calculated as specified in Appendix 7. (R 336.1213(3))

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. 40 CFR 60, Subpart Kb, shall not apply to EUTANK57 because the permittee has accepted the limitation of storing organic compounds which have vapor pressure not exceeding 0.5 psia. (R 336.1604(1)), (R 336.1213(2))

Footnotes:

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

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EULOADRACK
EMISSION UNIT CONDITIONS**

DESCRIPTION

Seven bay petroleum products truck loading rack. This emission unit is subject to 40 CFR 60 Subpart A (Applicability to NSPS provisions), Subpart XX (Standards of Performance for Bulk Gasoline Terminals) and Subpart BBBBBB (National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities).

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Permanent vapor recovery unit, permanent vapor combustion unit, and a portable vapor combustion unit whose location is restricted to the area shaded on the attached site plan in Appendix 9.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.VOC	10 mg/liter of gasoline loaded ²	6 hour test average	EULOADRACK	SC III.2, SC III.4 - SC III.10, SC V.1- SC V.7, SC VI.15	R 336.1225, R 336.1702, 40 CFR 63.11088(a)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.Gasoline	850,000,000 gal/year ²	12 month rolling time period as determined at the end of each calendar month	EULOADRACK	SC VI.1	R 336.1225
2. Distillate	300,000,000 gal/year ²	12 month rolling time period as determined at the end of each calendar month	EULOADRACK	SC VI.1	R 336.1225

III. PROCESS/OPERATIONAL RESTRICTION(S)

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.²
(40 CFR Part 60, Subparts A & XX)
2. The permittee shall not operate the petroleum product truck loading rack unless the vapor recovery system or vapor combustion unit is installed and operating properly.²
(40 CFR 60.502), (R 336.1910(1))
3. The permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility.²
(40 CFR 60.502(e)(2))
4. Loading of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:²
(40 CFR 60.502(e))

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

- a. The permittee shall cross check each tank identification number obtained in SC III.3 with the file of tank truck vapor tightness documentation within two weeks after the corresponding tank is loaded.
(40 CFR 60.502(e)(3))
- b. The permittee shall notify the owner or operator of each non vapor-tight gasoline tank truck loaded at the facility within 1 week of the documentation cross-check required in SC III.4a and 40 CFR § 60.502(e)(3).
(40 CFR 60.502(e)(4))
- c. The permittee shall take steps assuring that the non-vapor-tight gasoline tank truck will not be reloaded at the facility until vapor tightness documentation for that tank is obtained.
(40 CFR 60.502(e)(5))
- d. The permittee shall act to assure that loading of gasoline tank trucks at the facility are made only into tank trucks that are compatible with the terminal's vapor collection system.
(40 CFR 60.502(f))
5. The permittee shall not operate EULOADRACK unless the Malfunction Abatement Plan on file at the District Office, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The MAP shall be consistent with Rule 911(2). If the malfunction abatement 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, by order of the AQD, revise the Malfunction Abatement Plan within the time specified in the order after such an event occurs and submit the revised plan to the AQD District Supervisor. The revised plan shall include procedures for maintaining and operating in a satisfactory manner, the Vapor Recovery Unit during malfunction events, and a program for corrective action for such events.²
(R 336.1911)
6. The permittee shall act to assure that the terminal and tank truck's vapor collection system are connected during each loading of a gasoline tank truck at the facility.²
(40 CFR 60.502(g))
7. Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for the total organic compounds liquid or vapor leaks. For the purpose of this inspection, detection methods such as sight, sound or smell are acceptable.²
(40 CFR 60.502(j))
8. The permittee shall record each detection of a leak and the source of the leak shall be repaired as soon as practicable, but no later than fifteen (15) calendar days after the leak is detected.²
(40 CFR 60.502(j))
9. The permittee shall not allow the loading of, any organic compound that has a true vapor pressure of more than 1.5 psia at actual conditions from any stationary vessel into any delivery vessel unless the delivery vessels are controlled by a vapor system that capture all displaced organic vapor and air by means of a vapor-tight collection line. Compliance with this requirement shall be considered compliance with 40 CFR 60.502(a), which has been subsumed under this streamlined requirement.²
(40 CFR 60.502(a), (40 CFR Part 60, Subpart XX), (R 336.1609(2))
10. Any delivery vessel located at the facility shall be equipped, maintained or controlled with an interlocking system or procedure to ensure that the vapor-tight collection line is connected before any organic compound can be loaded.²
(R 336.1609(3)(a))
11. 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.²
(R 336.1627(7))
12. The permittee shall not allow gasoline to be handled in a manner that would result in vapor release to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to the following:²
 - a. Minimize the gasoline spills
 - b. Clean up the spills as expeditiously as practicable
 - c. Cover all open gasoline containers with a gasketed seal when not in use

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

- d. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators. (R 366.1225)
13. The permittee shall develop written procedures for the operation of the above control measures and shall post those procedures in an accessible and conspicuous location near the loading device.² (R 336.1609(4))
14. The permittee shall not operate the Portable Vapor Combustion Unit (PVCU) authorized under this emission unit unless the PVCU is located in the shaded area indicated on the site plan in Appendix 9.¹ (R 336.1225)
15. Each owner or operator of a bulk gasoline terminal shall install, calibrate, certify, operate, and maintain, according to the manufacturer's specifications, a continuous monitoring system (CMS) while gasoline vapors are displaced to the vapor processor systems, as specified in paragraphs (b)(1) through (5) of §63.11092. (40 CFR 63.11092(b))

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. After June 30, 1981, it is unlawful for a person to load, or allow the loading of, any organic compound that has a true vapor pressure of more than 1.5 psia at actual conditions from any stationary vessel into any delivery vessel located at an existing loading facility which has a throughput of 5,000,000 or more gallons of such compounds per year, unless such delivery vessel is filled by a submerged fill pipe.² (R 336.1225),(R 336.1609(1))
2. Each vapor collection system shall be designed to prevent any total organic compounds vapor collected at one loading rack from passing to another loading rack.² (40 CFR 60.502(d))
3. The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in a delivery tank from exceeding 450 mm of water during product loading. This level is not to be exceeded when measured by the procedures specified in §60.503(d).² (40 CFR 60 502(h))
4. No pressure vacuum-vent in the bulk gasoline terminal's vapor collection system shall begin to open at system pressure less than 450 mm of water.² (40 CFR 60 502(i))
5. Any delivery vessel located at the facility shall be equipped, maintained or controlled with 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.² (R 336.1609(3)(c))
6. Any delivery vessel located at the facility shall be equipped, maintained or controlled with 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.² (R 336.1609(3)(d))
7. Any delivery vessel located at the facility shall be equipped, maintained or controlled with hatch openings that are kept closed and vapor-tight during the loading of the delivery vessel.² (R 336.1609(3)(d))
8. For the flare control system, if such is installed at the facility, a heat-sensing device, such as an ultraviolet beam sensor or a thermocouple, shall be installed in proximity to the pilot light to indicate the presence of a flame.² (40 CFR 63.427(a)(4))

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. Within 365 days of the issuance date of this permit and once every 5 consecutive years thereafter, the permittee shall verify the VOC emission rate from EULOADRACK, by testing, in accordance with Department requirements. Not less than 30 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Not less than 7 days prior to the tests, the permittee shall notify the AQD in writing of the time and place of the tests and who shall conduct them. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.² (40 CFR 60.8(a), R 336.1213(3))

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

2. In conducting the performance tests required in SC V.1, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in §60.503(a), except as provided in §60.8(b). The three-run requirement of §60.8(f) does not apply to this subpart.²
(40 CFR 60.503(a))
3. Immediately before the performance test required to determine compliance with §60.502 (b), (c), and (h), the owner or operator shall use Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The owner or operator shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.²
(40 CFR 60.503(b))
4. The owner or operator of an affected facility shall provide the administrator at least 30 days prior notice of any performance test, except as specified under other subparts, to afford the administrator the opportunity to have an observer present.²
(40 CFR 60.8(d))
5. Compliance with standards in this part, other than opacity standards, shall be determined in accordance with performance tests established by §60.8 unless otherwise specified in the applicable standard.²
(40 CFR 60.11(a))
6. Each owner or operator of a bulk gasoline terminal subject to the emission standard in item 1(b) of Table 2 to Subpart BBBBBB must comply with the requirements in paragraphs (a) through (d) of §63.11092.
(40 CFR 63.11092(a))
7. If the permittee is operating EULOADRACK in compliance with an enforceable State permit that requires the loading rack to meet an emission limit of 80 milligrams (mg), or less, per liter of gasoline loaded (mg/l), the permittee may submit a statement by a responsible official certifying the compliance status of EULOADRACK in lieu of the test required under paragraph (a)(1) of §63.11092.
(40 CFR 63.11092(a)(2))

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall keep records of the EULOADRACK throughput volume of each specific petroleum product for each calendar month and each 12-month rolling time period. All records shall be kept on file for a period of at least five years and made available to the Department upon request.²
(R 336.1225)
2. Maintain a record of the results of the inspections performed as applicable requirements by rule.²
(R 336.1627)

(R336.1213)

3. The permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least 5 years.²
(40 CFR 60.505(f))
4. The permittee shall keep documentation of all notifications required under §60.502(e)(4) on file at the terminal for five years.²
(40 CFR 60.505(d))

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

5. 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.²
 - a. The copy of each record in paragraph (e)(2) of §60.505 is an exact duplicate image of the original paper record with certifying signatures.
 - b. The permitting authority is notified in writing that each terminal using this alternative is in compliance with paragraph (e)(2) of §60.505.
6. 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:² **(40 CFR 60.505 (b))**
 - a. Test title: Gasoline Delivery Tank Pressure Test-EPA Reference Method 27.
 - b. Tank owner and address
 - c. Tank identification number
 - d. Testing location
 - e. Date of test
 - f. Tester name and signature
 - g. Witnessing inspector, if any: Name, signature, and affiliation
 - h. Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs). **(40 CFR 60.505 (b))**
7. A record of each monthly leak inspection required under §60.502(j) shall be kept on file at the terminal for at least 5 years. Inspection records shall include, as a minimum, the following information:²
 - a. Date of inspection
 - b. Findings (may indicate no leaks discovered; or location, nature and severity of each leak).
 - c. Leak determination method
 - d. Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).
 - e. Inspector name and signature **(40 CFR 60.505 (c))**
8. The terminal owner or operator shall keep documentation of all notifications required under §60.502(e)(4) on file at the terminal for at least 5 years.² **(40 CFR 60.505 (d))**

(40 CFR 60.505 (d))
9. As an alternative to keeping records at the terminal of each gasoline cargo tank test result as required in paragraphs (a), (c), and (d) of §60.505, an owner or operator may comply with the requirements in either paragraph a or b as follows:² **(40 CFR 60.505 (e))**
 - a. An electronic copy of each record is instantly available at the terminal.
 - (1) The copy of each record in paragraph (e)(1) of §60.505 is an exact duplicate image of the original paper record with certifying signatures.
 - (2) The permitting authority is notified in writing that each terminal using this alternative is in compliance with paragraph (e)(1) of §60.505.
 - b. 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.
 - (1) The copy of each record in paragraph (e)(2) of §60.505 is an exact duplicate image of the original paper record with certifying signatures.

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

(2) The permitting authority is notified in writing that each terminal using this alternative is in compliance with paragraph (e)(2) of §60.505.

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
4. The permittee shall submit reports for EULOADRACK in accordance with the National Emission Standards for Hazardous Air Pollutants (NESHAP) as specified in 40 CFR Part 63 Subparts A and BBBBBB, as they apply to EULOADRACK. (40 CFR Part 63, Subparts A and BBBBBB)
5. The permittee shall include in a semiannual report to the Administrator, each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility. (40 CFR 63.11095(a)(2))

See Appendix 8

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 Dimensions (feet)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1.SV VRU	12 ¹	22 ¹	R336.1225
2.SV PERMANENTVCU	8 ¹	45 ¹	R336.1225
3.SV PORTABLEVCU	8.5 ¹	13 ¹	R336.1225

IX. OTHER REQUIREMENT(S)

1. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.² (R 336.1912),(R 336.1091)
2. The permittee shall comply with all applicable provisions of Rules 605, 606, 609 and 627.² (R 336.1605), (R 336.1606), (R 336.1609), (R 336.1627)
3. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and BBBBBB, for Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities. (40 CFR 63 Subparts A and BBBBBB)

Footnotes:

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

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

D. FLEXIBLE GROUP CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

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
FGMACT6B	Area source gasoline distribution bulk terminal with gasoline storage tanks and gasoline loading rack subject to 40 CFR Subpart BBBB.	EULOADRACK, EUTANK12, EUTANK15, EUTANK16, EUTANK17, EUTANK18, EUTANK20, EUTANK22, EUTANK23 & EUTANK56
FGGASNSPS	Three Four petroleum products / denatured ethanol storage tanks, each equipped with a floating roof, and NSPS subject (from PTI 100-17)	EUTANK12, EUTANK16 (from PTI 100-17) , EUTANK22, & EUTANK56
FGGASTANKS	Nine Eight petroleum products storage tanks each equipped with a floating roof (from PTI 100-17)	EUTANK14, EUTANK15, EUTANK16 (from PTI 100-17) , EUTANK17, EUTANK18, EUTANK20, EUTANK23, EUTANK24 & EUTANK25
FGDISTTANKS	Four distillate petroleum products storage tanks	EUTANK5, EUTANK9 EUTANK13 & EUTANK21
FGFIXEDROOFTANKS	Three petroleum products tanks with fixed roofs	EUTANK8, EUTANK52 & EUTANK53
FGAIRSTRIPPERS	Groundwater remediation system consisting of two air strippers and a SVE system with catalytic oxidizer (CATOX).	EUAIRSTRIPPER
FGRULE290	One butane tank	EUBUTANE

**FGMACT6B
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Area source gasoline distribution bulk terminal with gasoline storage tanks and gasoline loading racks subject to 40 CFR Subpart BBBB.

Emission Units: EULOADRACK, EUTANK12, EUTANK15, EUTANK16, EUTANK17, EUTANK18, EUTANK20, EUTANK22, EUTANK23 & EUTANK56

POLLUTION CONTROL EQUIPMENT

Internal floating roofs, permanent vapor recovery unit, permanent vapor combustion unit, and a portable vapor combustion unit whose location is restricted to the area shaded on the attached site plan in Appendix 9.

I. EMISSION LIMIT(S)

NA - Refer to EULOADRACK in Part C of this document

II. MATERIAL LIMIT(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip each gasoline storage tank in FGMACT6B according to the requirements of 40 CFR 60.112b as follows: **(40 CFR 63.11087(a))**
 - a. Equip each internal floating roof gasoline storage tank according to the requirements in §60.112b(a)(1) except for the secondary seal requirements under §60.112b(a)(1)(ii)(B) and the requirements in §60.112b(a)(1)(iv) through (ix).
 - b. Equip each external floating roof gasoline storage tank according to the requirements in §60.112b(a)(2) except that the requirements of §60.112b(a)(2)(ii) shall only be required if such storage tank does not currently meet the requirements of §60.112b(a)(2)(i); or
 - c. Equip and operate each internal and external floating roof gasoline storage tank according to the applicable requirements in §63.1063(a)(1) and (b), except for the secondary seal requirements under §63.1063(a)(1)(i)(C) and (D), and equip each external floating roof gasoline storage tank according to the requirements of §63.1063(a)(2) if such storage tank does not currently meet the requirements of §63.1063(a)(1).
2. If a gasoline tank is subject to, and complies with, the control requirements of 40 CFR Part 60, Subpart Kb, the storage tank will be deemed in compliance with §63.11087. The permittee shall report this determination in the Notification of Compliance Status report under §63.11093(b). **(40 CFR 63.11087(f))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

See Appendix 5

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall perform a monthly leak inspection of all equipment in gasoline service, as defined in §63.11100. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. (40 CFR 63.11089 (a))
2. A log book shall be used and shall be signed by the owner or operator at the completion of each inspection. A section of the log shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility. (40 CFR 63.11089 (b))
3. Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak, except as provided in SC VI.4 below. (40 CFR 63.11089 (c))
4. Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The owner or operator shall provide in the semiannual report specified in §63.11095(b), the reason(s) why the repair was not feasible and the date each repair was completed. (40 CFR 63.11089 (d))
5. Each owner or operator of an affected source subject to equipment leak inspections under §63.11089 shall record in the log book for each leak that is detected the information specified in paragraphs a through g below: (40 CFR 63.11094 (e))
 - a. The equipment type and identification number;
 - b. The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell);
 - c. The date the leak was detected and the date of each attempt to repair the leak;
 - d. Repair methods applied in each attempt to repair the leak;
 - e. "Repair delayed" and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak;
 - f. The expected date of successful repair of the leak if the leak is not repaired within 15 days; and
 - g. The date of successful repair of the leak.

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A.
The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30.
(R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
4. The permittee shall submit reports for FG-MACT6B in accordance with the National Emission Standards for Hazardous Air Pollutants (NESHAP) as specified in 40 CFR Part 63 Subparts A and BBBBBB, as they apply to FGMACT6B. (40 CFR Part 63, Subparts A and BBBBBB)
5. The permittee shall include in a semiannual report to the Administrator, the number of equipment leaks not repaired within 15 days after detection. (40 CFR 63.11095(a)(3))
6. For each occurrence of an equipment leak for which no repair attempt was made within 5 days or for which repair was not completed within 15 days after detection: (40 CFR 63.11095(b)(5))
 - a. The date on which the leak was detected;

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

- b. The date of each attempt to repair the leak;
 - c. The reasons for the delay of repair; and
 - d. The date of successful repair.
7. Each owner or operator of a bulk gasoline plant shall submit a semiannual excess emissions report, including the information specified in SC VII.5 and SC VII.6, only for a 6-month period during which an excess emission event has occurred. If no excess emission events have occurred during the previous 6-month period, no report is required. **(40 CFR 63.11095(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA - Refer to EULOADRACK in Part C of this document

IX. OTHER REQUIREMENT(S)

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, Subpart A and BBBBBB, for Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities. **(40 CFR 63 Subparts A and BBBBBB)**

Footnotes:

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

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**FGGASNSPS
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Emissions from ~~Three~~ four petroleum products / denatured ethanol storage tanks, each equipped with an internal floating roof including landing (3 events/year/tank) and cleanings. (from PTI 100-17)

Emission Units: EUTANK12, EUTANK16 (from PTI 100-17), EUTANK22, & EUTANK56

POLLUTION CONTROL EQUIPMENT

Internal floating Roof

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

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 Kb, as they apply to FGGASNSPS.²
(40 CFR Part 60, Subparts A & Kb)

2. ~~The permittee shall not store any petroleum product in EUTANK16 other than denatured ethanol.~~
(R 336.1225) (from PTI 100-17)

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IV. DESIGN/EQUIPMENT PARAMETER(S)

~~1. The vessel shall be 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 roof and the vessel wall.²~~
(R 336.1604(1)(b)), (40 CFR 60.112(b)(a)(1))

~~2. The seal or any seal fabric shall have no visible holes, tears or other nonfunctional openings~~
(R 336.1604(1)(b)), (40 CFR 60.112(b)(a)(1))

~~3. The permittee shall equip all emission units within FGGASNSPS with covers that completely cover all openings except for those which are no larger than necessary to allow safe clearance for the floating roof. The openings shall be covered at all times except when in actual use.²~~
(40 CFR Part 60.112b(1)(C)(iii thru ix))

1. Any storage vessel holding organic liquid having true vapor pressure of more than 0.75 psia, but less than 11 psia in FGGASNSPS shall be 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 roof and the vessel wall. (R 336.1604(1)(b), 40 CFR 60.112b(a)(1))

2. The seal or any seal fabric of the emission units in FGGASNSPS shall have no visible holes, tears or other nonfunctional openings when storing organic liquid having true vapor pressure of more than 0.75 psia, but less than 11 psia. (R 336.1604(1)(b), 40 CFR 60.112b(a)(1))

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

3. The permittee shall equip all emission units within FGGASNSPS with covers that completely cover all openings except for those which are no larger than necessary to allow safe clearance for the floating roof when storing organic liquid having true vapor pressure of more than 0.75 psia, but less than 11 psia. The openings shall be covered at all times except when in actual use. (40 CFR Part 60.112b(a)(1)(iii thru ix))

(from PTI 6-18)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. After installing the control equipment required to meet §60.112b(a)(1) (permanently affixed roof and internal floating roof), each owner or operator of any storage vessel holding organic liquid having a true vapor pressure of more than 0.75 psia, but less than 11 psia, shall: (from PTI 6-18)
 - 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 §60.115b(a)(3). (40 CFR 60.113b(a)(2))
 - c. For vessels equipped with a double-seal system as specified in §60.112b(a)(1)(ii)(B):
 - (1) Visually inspect the vessel as specified in paragraph (a)(4) of §60.113b(a)(3) at least every 5 years; or
 - (2) Visually inspect the vessel as specified in paragraph (a)(2) of §60.113b(a)(3). (40 CFR 60.113b(a)(3))
 - d. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs (a)(2) and (a)(3)(ii) of §60.113b(a)(4) and at intervals no greater than 5 years in the case of vessels specified in paragraph (a)(3)(i) of §60.113b(a)(4). (40 CFR 60.113b(a)(4))
 - e. Notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs (a)(1) and (a)(4) of §60.113b(a)(5) to afford the Administrator the opportunity to have an observer present. If the inspection required by paragraph (a)(4) of §60.113b(a)(5) is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Administrator at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation, or by express mail so that it is received by the Administrator at least 7 days prior to the refilling. (40 CFR 60.113b(a)(5))
2. The permittee shall keep readily accessible records that show the dimensions of each storage vessel and an analysis that show the capacity of the storage vessel. The records shall be kept as long as the storage vessel remains in operation. (40 CFR 60.110b), (40 CFR 60.116b)

3. The owner or operator of each storage vessel in FGGASNSPS shall maintain a record of the volatile organic liquid (VOL) stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. (40 CFR 60.116b)(c)
4. The owner or operator of each storage vessel in FGGASNSPS shall notify the Administrator within 30 days when the maximum true vapor pressure of the liquid exceeds ~~the respective maximum true vapor pressure values for each volume range, 5.2 KPa (0.75 psia) maximum for vessels equal to or greater than 151 m³ (950 bbl.) and 27.6 KPa (4.0 psia) for vessels between 75 m³ and 150 m³ (476 – 950 bbl.). This condition is not applicable to storage vessels less than 75 m³. (from PTI 6-18)~~ (40CFR60.116)(d))

VII. REPORTING

1. ~~Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))~~
2. ~~Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))~~
3. ~~Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))~~
4. ~~The owner or operator of each storage vessel in FGGASNSPS, as specified in 40 CFR 60.112b(a), shall keep records and furnish reports as required by paragraphs (a), (b), or (c) of §60.113b depending upon the control equipment installed to meet the requirements of §60.115b. The owner or operator shall keep copies of all reports and records required by §60.113b, except for the record required by (c)(1), for at least 5 years. The record required by (c)(1) of §60.115b will be kept for the life of the control equipment. (40 CFR 60.115b)~~
 - a. ~~After installing control equipment in accordance with §60.112b(a)(1) (fixed roof and internal floating roof), the owner or operator shall meet the following requirements:~~
 - 1) ~~Furnish the Administrator with a report that describes the control equipment and certifies that the control equipment meets the specifications of §60.112b(a)(1) and §60.113b(a)(1). This report shall be an attachment to the notification required by §60.7(a)(3).~~
 - 2) ~~Keep a record of each inspection performed as required by §60.113b (a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).~~
 - 3) ~~If any of the conditions described in §60.113b(a)(2) are detected during the annual visual inspection required by §60.113b(a)(2), a report shall be furnished to the Administrator within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.~~
 - 4) ~~After each inspection required by §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in §60.113b(a)(3)(ii), a report shall be furnished to the Administrator within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of §61.112b(a)(1) or §60.113b(a)(3) and list each repair made.~~

See Appendix 8
(from PTI 100-17)

1. The owner or operator of each storage vessel in FGGASNSPS holding organic liquid having true vapor pressure of more than 0.75 psia, but less than 11 psia, as specified in 40 CFR 60.112b(a), shall keep records and furnish reports as required by paragraphs (a), (b), or (c) of §60.113b depending upon the control equipment installed to meet the requirements of §60.115b. The owner or operator shall keep copies of all reports and records required by §60.113b, except for the record required by (c)(1), for at least 5 years. The record required by (c)(1) of §60.115b will be kept for the life of the control equipment. **(40 CFR 60.115b)**

a. After installing control equipment in accordance with §60.112b(a)(1) (fixed roof and internal floating roof), the owner or operator shall meet the following requirements: (1) Furnish the Administrator with a report that describes the control equipment and certifies that the control equipment meets the specifications of §60.112b(a)(1) and §60.113b(a)(1). This report shall be an attachment to the notification required by §60.7(a)(3). (2) Keep a record of each inspection performed as required by §60.113b (a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). (3) If any of the conditions described in §60.113b(a)(2) are detected during the annual visual inspection required by §60.113b(a)(2), a report shall be furnished to the Administrator within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made. (4) After each inspection required by §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in §60.113b(a)(3)(ii), a report shall be furnished to the Administrator within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of §60.112b(a)(1) or §60.113b(a)(3) and list each repair made.

(from PTI 6-18)

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. All openings on storage vessels in FGGASNSPS except stub drains shall be equipped with covers, lids, or seals when storing organic liquid having true vapor pressure of more than 1.5 psia, but less than 11 psia such that the following conditions are met: **(R 336.1604(2))**

- a. The cover, lid, or seal is to be maintained in the closed position at all times, except when in actual use. **(R 336.1604(2)(a))**
- b. Automatic bleeder vents are closed at all times, except when the roof is floated off, or landed on, the roof leg supports. **(R 336.1604(2)(b))**
- c. Rim vents, if provided, are set at the manufacturer's recommended setting or are set to open when the roof is being floated off the roof leg supports. **(R 336.1604(2)(c))**

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2. The permittee shall not store any organic compound with a true vapor pressure (as defined in R 336.1120(i)) of 11 or more psia at actual storage conditions. **(R 336.1605)**

3. The permittee shall comply with all applicable provisions of Rule 604. **(R 336.1604)** Applicant shall equip all openings, except stub drains, in the stationary vessel, with covers, lids, or seals such that all of the following conditions are met: **(R 336.1604(2))**

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Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

- a. ~~The cover, lid, or seal is to be maintained in the closed position at all times, except when in actual use. (R 336.1604(2)(a))~~
- b. ~~Automatic bleeder vents are closed at all times, except when the roof is floated off, or landed on, the roof leg supports. (R 336.1604(2)(b))~~
- c. ~~Rim, vents, if provided, are set at the manufacturer's recommended setting or are set to open when the roof is being floated off the roof leg supports. (R 336.1604(2)(c))~~
- 2. ~~The permittee shall not store any organic compound with a true vapor pressure (as defined in R 336.1120(i)) of 11 or more psia at actual storage conditions. (R 336.1605)~~
- 3. ~~The permittee shall not equip any storage tank with an external floating roof. (R 336.1623)~~
- 4. ~~The permittee shall comply with all applicable provisions of Rules 604 and 605. (R 336.1604 and R 336.1605)~~

(from PTI 6-18)

Footnotes:

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

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

**FGGASTANKS
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Emissions from **Nine eight** petroleum products storage tanks each equipped with an internal floating roof including landing emissions (3/year/tank) and cleanings. (from PTI 100-17)

Emission Units: EUTANK14, EUTANK15, **EUTANK16**, EUTANK17, EUTANK18, EUTANK20, EUTANK23, EUTANK24 & EUTANK25 (from PTI 100-17)

POLLUTION CONTROL EQUIPMENT

Internal floating roof

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The vessel shall be 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 roof and the vessel wall.² (R 336.1604(1)(b))
2. The seal or any seal fabric shall have no visible holes, tears or other malfunctional openings. (R 336.1604(1)(b))
3. The permittee shall equip all emission units within FGGASTANKS with covers that completely cover all openings except for those which are no larger than necessary to allow safe clearance for the floating roof. The openings shall be covered at all times except when in actual use.² (R 336.1604(2))

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

1. The permittee shall monitor and keep records of true vapor pressure (as defined in R336.1120(i)) of all organic compounds stored, in psia, at actual storage conditions. (R336.1213(3)(b)(ii))
2. The permittee shall keep readily accessible records that show the dimensions of each storage vessel and an analysis that show the capacity of the storage vessel. The record shall be kept as long as the storage vessel remains in operation. (40CFR60.110b),(40CFR60.111b)

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

VII. REPORTING

- ~~1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(iii))~~
- ~~2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. Report shall be received by appropriate AQD district office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(ii))~~
- ~~3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. Report shall be received by appropriate AQD district office by March 15 for the previous calendar year. (R 336.1213(4)(c)) (from PTI 100-17)~~

See Appendix 8

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

- 1. The permittee shall equip all openings, except stub drains, in the stationary vessel, with covers, lids, or seals such that all of the following conditions are met: (R 336.1604(2))
 - (a) The cover, lid, or seal is in the closed position at all times, except when in actual use. (R 336.1604(2)(a))
 - (b) Automatic bleeder vents are closed at all times, except when the roof is floated off, or landed on, the roof leg supports. (R 336.1604(2)(b))
 - (c) Rim, vents, if provided, are set at the manufacturer's recommended setting or are set to open when the roof is being floated off the roof leg supports. (R 336.1604(2)(c))
- 2. The permittee shall not store any organic compound with a true vapor pressure (as defined in R 336.1120(i)) of 11 or more psia at actual storage conditions. (R 336.1605)
- 3. The permittee shall comply with all applicable provisions of Rules 604 and 605. (R 336.1604 and R 336.1605)

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

FGDISTTANKS FLEXIBLE GROUP CONDITIONS
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DESCRIPTION

Emission from Two fixed roof distillate petroleum products storage tanks including cleanings with a capacity greater than 40,000 gallons.

Emission Units: EUTANK13 & EUTANK 21

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not store any organic compound with a true vapor pressure (as defined in R336.1120(i)) of more than 1.5 psia at actual storage conditions. (R336.1604(1))

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall monitor and maintain records on true vapor pressure (as defined in R 336.1120(i)) of all organic compounds stored, in psia, at actual storage conditions. R336.1213(3),(R336.1604(1))

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

See Appendix 8

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 Dimensions (Inches)	Minimum Height Above Ground (feet)	Applicable Underlying Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of Rule 604.

(R 336.1604)

Footnotes:

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

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

**FGFIXEDROOFTANKS
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Emissions from Three petroleum products tanks with fixed roofs including cleanings, each of which has a capacity of less than 10,000 gallons.

Emission Units: EUTANK8, EUTANK52 & EUTANK53

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The owner or operator shall not store any organic compound in FGFIXEDROOFTANKS having a true vapor pressure (as defined in R336.1120(i)) of more than 1.5 psia. (R 336.1604(1))
2. The owner or operator shall not store any carcinogenic liquids. (R 336.1213(3))

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall monitor and maintain records on true vapor pressure (as defined in R 336.1120(i)) of all organic compounds stored, in psia, at actual storage conditions. (R 336.1213(3)), (R 336.1604(1))
2. The permittee shall keep a record of all materials stored in FGFIXEDROOFTANKS. Records shall be made available to the Air Quality Division upon request. (R 336.1213(3))

(R336.1213(3))

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of Rule 604. (R336.1604)

Footnotes:

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

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

**FGAIRSTRIPPERS
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Groundwater remediation system consisting of two air strippers and a soil vapor extraction system

Emission Unit: EUAIRSTRIPPER

POLLUTION CONTROL EQUIPMENT

Catalytic oxidizer

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
VOC	20 lbs/month	Calendar month	EUAIRSTRIPPER	IV.1, VI.1, VI.2	R 336.1290(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively.
(R 336.1290(a)(i))
2. Each emission unit that the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met:
(R 336.1290(a)(ii))
 - a. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 1,000 or 500 pounds per month, respectively.
(R 336.1290(a)(ii)(A))
 - b. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 microgram per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively.
(R 336.1290(a)(ii)(B))
 - c. For carcinogenic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively.
(R 336.1290(a)(ii)(C))
 - d. The emission unit shall not emit any air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter.
(R 336.1290(a)(ii)(D))

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. (R 336.1290)

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 336.1213(3)(b)(ii))

1. Total VOC concentration shall be determined using the standard MDEQ groundwater analytical scans for VOCs. Any request for a change in the sampling frequency shall be submitted to the AQD District Supervisor for review and approval.² (R 336.1225, R 336.1702(a))

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. On a monthly basis, the permittee shall monitor, in a satisfactory manner, the flow rate, the total VOC concentration, the Benzene concentration, and the Naphthalene concentration of the air stripper influent and effluent water streams. Total VOC concentration shall be determined using the standard MDEQ groundwater analytical scans for VOCs. Any request for a change in the sampling frequency shall be submitted to the AQD District Supervisor for review and approval.² (R 336.1225, R 336.1702(a), R 336.1213(3))
2. All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition.² (R 336.1225, R 336.1702(a))

See Appendix 7

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGRULE290
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.

Emission Unit: EUBUTANE

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

1. Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively.
(R 336.1290(a)(i))
2. Each emission unit that the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met:
(R 336.1290(a)(ii))
 - a. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 1,000 or 500 pounds per month, respectively.
(R 336.1290(a)(ii)(A))
 - b. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 microgram per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively.
(R 336.1290(a)(ii)(B))
 - c. For carcinogenic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively.
(R 336.1290(a)(ii)(C))
 - d. The emission unit shall not emit any air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter.
(R 336.1290(a)(ii)(D))
3. Each emission unit that emits only noncarcinogenic particulate air contaminants and other air contaminants that are exempted under Rule 290(a)(i) and/or Rule 290(a)(ii), if all of the following provisions are met:
(R 336.1290(a)(iii))
 - a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have an exhaust gas flow rate more than 30,000 actual cubic feet per minute. (R 336.1290(a)(iii)(A))

- b. The visible emissions from the emission unit are not more than five percent opacity in accordance with the methods contained in Rule 303. (R 336.1290(a)(iii)(B))
- c. The initial threshold screening level for each particulate air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. (R 336.1290(a)(iii)(C))

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- 1. The provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. (R 336.1290)

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 336.1213(3)(b)(ii))

- 1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ, AQD Rule 290, Permit to Install Exemption Record form (EQP 3558) or in a format that is acceptable to the AQD District Supervisor. (R 336.1213(3))
 - a. Records identifying each air contaminant that is emitted. (R 336.1213(3))
 - b. Records identifying if each air contaminant is controlled or uncontrolled. (R 336.1213(3))
 - c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. (R 336.1213(3))
 - d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(a)(ii) and (iii). (R 336.1213(3))
 - e. Material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. (R 336.1213(3), R 336.1290(c))
- 2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. (R 336.1213(3))
 - a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. (R 336.1290(b), R 336.1213(3))
 - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. (R 336.1213(3))

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. (R 336.1213(3))

See Appendix 4

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that the requirements identified in the table below are not applicable to the specified emission unit(s) and/or flexible group(s). This determination is incorporated into the permit shield provisions set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii). If the permittee makes a change that affects the basis of the non-applicability determination, the permit shield established as a result of that non-applicability decision is no longer valid for that emission unit or flexible group.

Emission Unit/Flexible Group ID	Non-Applicable Requirement	Justification
EUTANK57	40 CFR 60, Subpart Kb	Permittee has requested that condition to store only materials having a true vapor pressure of 0.5 psia or less.

Appendix 1: Abbreviations and Acronyms

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO _{2e}	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H ₂ S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfunction Abatement Plan	MW	Megawatts
MDEQ	Michigan Department of Environmental Quality	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO _x	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM10	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

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

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

Appendix 2. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. (R 336.1213(4)(a), R 336.1119(a)(ii))

Appendix 3. Monitoring Requirements

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 4. Recordkeeping

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

Appendix 5. Testing Procedures

Specific testing requirement plans, procedures, and averaging times are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B2987-2008. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-B2987-2008a is being reissued as Source-Wide PTI No. MI-PTI-B2987-2016.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	201100069	Administrative Amendment-Name Change	Source-wide
189-12	NA	Seven bay Petroleum Products truck loading rack	EULOADRACK

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

Appendix 7. Emission Calculations

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in EUTANK57 and FGAIRSTRIPPERS.

1. For EUTANK57, to determine the maximum true vapor pressure (P_{vx}), the permittee shall use the methods and procedures specified in EPA's AP-42, Chapter 7.1 Storage of Organic Liquids, November 2006 edition, which may include the use of the following equation:

$$P_{vx} = \exp [A - (B/T_{Lx})]$$

Where:

exp = exponential function

A = constant in the vapor pressure equation, dimensionless

B = constant in the vapor pressure equation, °R

T_{Lx} = maximum daily liquid surface temperature, °R

P_{vx} = true vapor pressure at the daily maximum liquid surface temperature, psia

2. The following table is to be used to make required calculations for VOC emission rates from FGAIRSTRIPPERS:

Groundwater Remediation Emission Calculation and Recordkeeping

Source Name		Contact Person	
Location		County	
Recordkeeping Period		Permit Number	Pollutant(s)
Start Date	End Date		

Date	A Water Flow (gal/min)	B Concentration (ppm)			F Control Efficiency (Percent)	E VOC Emissions (lbs. /hr.)
		Inlet	Outlet	D In - Out		
EXAMPLE	100	210	10	200	95	0.5

EQUATION TO CALCULATE EMISSIONS: $D = B - C$, all units in parts per million (ppm)

Signature: _____

Date: _____

Telephone Number: _____

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the MDEQ Report Certification form (EQP 5736) and MDEQ Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

B. Other Reporting

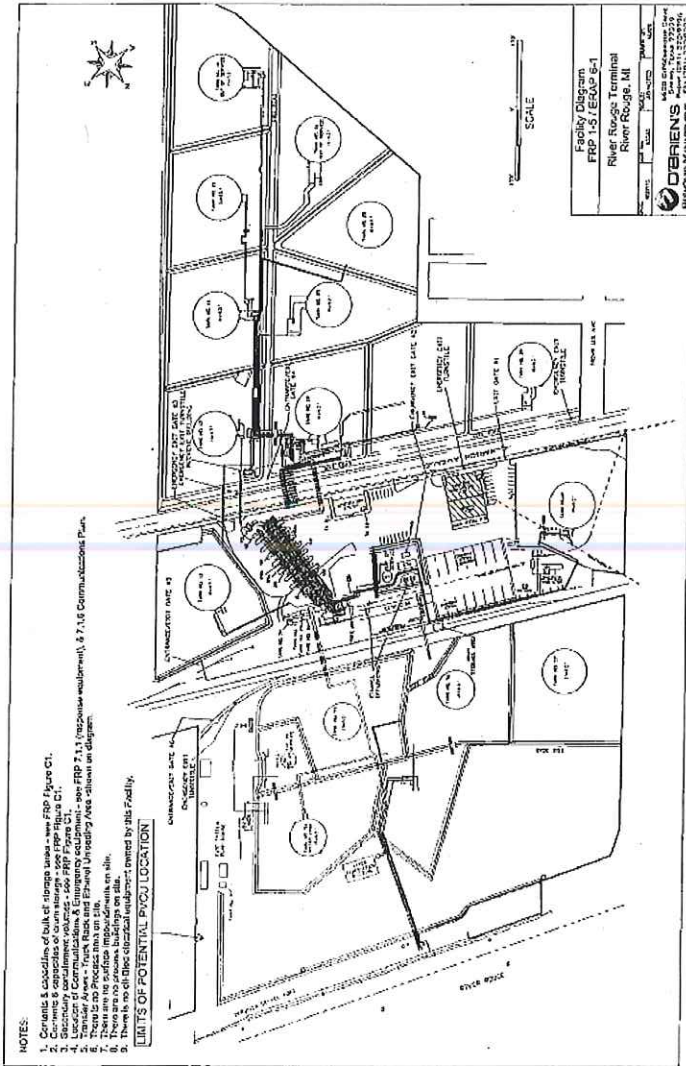
Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

Appendix 9. Site Plan

The location of the portable vapor combustion unit is restricted to the shaded area indicated below:



**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

August 15, 2017

**PERMIT TO INSTALL
100-17**

**ISSUED TO
Buckeye Terminals, LLC**

**LOCATED AT
205 Marion Avenue
River Rouge, Michigan**

**IN THE COUNTY OF
Wayne**

**STATE REGISTRATION NUMBER
B2987**

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: June 28, 2017	
DATE PERMIT TO INSTALL APPROVED: August 15, 2017	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Table of Contents

Section	Page
Alphabetical Listing of Common Abbreviations / Acronyms	2
General Conditions	3
Special Conditions	5
Emission Unit Summary Table.....	5
Flexible Group Summary Table	5
Special Conditions for FGGASNSPS.....	6
Special Conditions for FGGASTANKS	9

Common Abbreviations / Acronyms

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO _{2e}	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H ₂ S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfunction Abatement Plan	MW	Megawatts
MDEQ	Michigan Department of Environmental Quality	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO _x	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM ₁₀	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM _{2.5}	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		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)	Installation Date / Modification Date	Flexible Group ID
EUTANK16	Tank 16- 2,968,000 gallons tank with internal floating roof control.	1/1/1928/ 9/1/2017	FGMACT6B FGGASNSPS

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 336.1290.

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
FGGASNSPS	Four petroleum products/denatured ethanol storage tanks, each equipped with a floating roof, and NSPS subject	EUTANK12, EUTANK16, EUTANK22 & EUTANK56
FGGASTANKS	Eight petroleum products storage tanks each equipped with a floating roof	EUTANK14, EUTANK15, EUTANK17, EUTANK18, EUTANK20, EUTANK23, EUTANK24 & EUTANK25

The following conditions apply to: FGGASNSPS

DESCRIPTION

Emissions from four petroleum products/denatured ethanol storage tanks, each equipped with an internal floating roof including landing (3 events/year/tank) and cleanings.

Emission Units: EUTANK12, EUTANK16, EUTANK22, & EUTANK56

POLLUTION CONTROL EQUIPMENT

Internal floating Roof

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

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 Kb, as they apply to FGGASNSPS.² **(40 CFR Part 60, Subparts A & Kb)**
2. The permittee shall not store any petroleum product in EUTANK16 other than denatured ethanol. **(R 336.1225)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The vessel shall be 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 roof and the vessel wall.² **(R 336.1604(1)(b)), (40 CFR 60.112b(a)(1))**
2. The seal or any seal fabric shall have no visible holes, tears or other nonfunctional openings. **(R 336.1604(1)(b)), (40 CFR 60.112b(a)(1))**
3. The permittee shall equip all emission units within FGGASNSPS with covers that completely cover all openings except for those which are no larger than necessary to allow safe clearance for the floating roof. The openings shall be covered at all times except when in actual use.² **(40 CFR Part 60.112b(1)(C)(iii thru ix))**
4. EUTANK16 shall be 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 roof and the vessel wall.² **(R 336.1702(a), (40 CFR 60.112b(a)(1))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. After installing the control equipment required to meet §60.112b(a)(1) (permanently affixed roof and internal floating roof), each owner or operator shall:
 - 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 §60.115b(a)(3). **(40 CFR 60.113b(a)(2))**
 - c. For vessels equipped with a double-seal system as specified in §60.112b(a)(1)(ii)(B): **(40 CFR 60.113b(a)(3))**
 - (1) Visually inspect the vessel as specified in paragraph (a)(4) of §60.113b(a)(3) at least every 5 years;
or
 - (2) Visually inspect the vessel as specified in paragraph (a)(2) of §60.113b(a)(3).
 - d. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs (a)(2) and (a)(3)(ii) of §60.113b(a)(4) and at intervals no greater than 5 years in the case of vessels specified in paragraph (a)(3)(i) of §60.113b(a)(4). **(40 CFR 60.113b(a)(4))**
 - e. Notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs (a)(1) and (a)(4) of §60.113b(a)(5) to afford the Administrator the opportunity to have an observer present. If the inspection required by paragraph (a)(4) of §60.113b(a)(5) is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Administrator at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation, or by express mail so that it is received by the Administrator at least 7 days prior to the refilling. **(40 CFR 60.113b(a)(5))**
2. The permittee shall keep readily accessible records that show the dimensions of each storage vessel and an analysis that show the capacity of the storage vessel. The records shall be kept as long as the storage vessel remains in operation. **(40 CFR 60.110b), (40 CFR 60.116b)**
3. The owner or operator of each storage vessel in FGGASNSPS shall maintain a record of the volatile organic liquid (VOL) stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. **(40 CFR 60.116b(c))**
4. The owner or operator of each storage vessel in FGGASNSPS shall notify the Administrator within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range, 5.2 KPa (0.75 psia) maximum for vessels equal to or greater than 151 m³ (950 bbl.) and 27.6 KPa (4.0 psia) for vessels between 75 m³ and 150 m³ (476 - 950 bbl.). This condition is not applicable to storage vessels less than 75 m³. **(40 CFR 60.116(d))**

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. Applicant shall equip all openings, except stub drains, in the stationary vessel, with covers, lids, or seals such that all of the following conditions are met: **(R 336.1604(2))**
 - a. The cover, lid, or seal is to be maintained in the closed position at all times, except when in actual use. **(R 336.1604(2)(a))**
 - b. Automatic bleeder vents are closed at all times, except when the roof is floated off, or landed on, the roof leg supports. **(R 336.1604(2)(b))**
 - c. Rim, vents, if provided, are set at the manufacturer's recommended setting or are set to open when the roof is being floated off the roof leg supports. **(R 336.1604(2)(c))**
2. The permittee shall not store any organic compound with a true vapor pressure (as defined in R 336.1120(i)) of 11 or more psia at actual storage conditions. **(R 336.1605)**
3. The permittee shall not equip any storage tank with an external floating roof. **(R 336.1623)**
4. The permittee shall comply with all applicable provisions of Rules 604 and 605. **(R 336.1604 and R 336.1605)**

Footnotes:

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

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

The following conditions apply to: FGGASTANKS

DESCRIPTION

Emissions from eight petroleum products storage tanks each equipped with an internal floating roof including landing emissions (3/year/tank) and cleanings.

Emission Units: EUTANK14, EUTANK15, EUTANK17, EUTANK18, EUTANK20, EUTANK23, EUTANK24 & EUTANK25

POLLUTION CONTROL EQUIPMENT

Internal floating roof

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The vessel shall be 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 roof and the vessel wall.² (R 336.1604(1)(b))
2. The seal or any seal fabric shall have no visible holes, tears or other malfunctional openings. (R 336.1604(1)(b))
3. The permittee shall equip all emission units within FGGASTANKS with covers that completely cover all openings except for those which are no larger than necessary to allow safe clearance for the floating roof. The openings shall be covered at all times except when in actual use.² (R 336.1604(2))

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

1. The permittee shall monitor and keep records of true vapor pressure (as defined in R336.1120(i)) of all organic compounds stored, in psia, at actual storage conditions. (R 336.1213(3)(b)(ii))

2. The permittee shall keep readily accessible records that show the dimensions of each storage vessel and an analysis that show the capacity of the storage vessel. The record shall be kept as long as the storage vessel remains in operation. **(40 CFR 60.110b), (40 CFR 60.111b)**

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall equip all openings, except stub drains, in the stationary vessel, with covers, lids, or seals such that all of the following conditions are met: **(R 336.1604(2))**
 - a. The cover, lid, or seal is in the closed position at all times, except when in actual use. **(R 336.1604(2)(a))**
 - b. Automatic bleeder vents are closed at all times, except when the roof is floated off, or landed on, the roof leg supports. **(R 336.1604(2)(b))**
 - c. Rim, vents, if provided, are set at the manufacturer's recommended setting or are set to open when the roof is being floated off the roof leg supports. **(R 336.1604(2)(c))**
2. The permittee shall not store any organic compound with a true vapor pressure (as defined in R 336.1120(i)) of 11 or more psia at actual storage conditions. **(R 336.1605)**
3. The permittee shall comply with all applicable provisions of Rules 604 and 605. **(R 336.1604 and R 336.1605)**

Footnotes:

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

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

April 4, 2018

**PERMIT TO INSTALL
6-18**

ISSUED TO
Buckeye Terminals, LLC – River Rouge Terminal

LOCATED AT
205 Marion Avenue
River Rouge, Michigan

IN THE COUNTY OF
Wayne

STATE REGISTRATION NUMBER
B2987

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: January 25, 2018	
DATE PERMIT TO INSTALL APPROVED: April 4, 2018	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Table of Contents

Section	Page
Alphabetical Listing of Common Abbreviations / Acronyms	2
General Conditions	3
Special Conditions	5
Emission Unit Summary Table.....	5
Flexible Group Summary Table	5
Special Conditions for FGGASNSPS.....	6

Common Abbreviations / Acronyms

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	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/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H ₂ S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfunction Abatement Plan	MW	Megawatts
MDEQ	Michigan Department of Environmental Quality	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO _x	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM ₁₀	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM _{2.5}	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		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)	Installation Date / Modification Date	Flexible Group ID
EUTANK12	Tank 12- 2,863,000 gallons tank with internal floating roof control, storing either gasoline, gasoline/ethanol blends, or diesel.	1/1/1994	FGMACT6B, FGGASNSPS
EUTANK22	Tank 22- 3,526,000 gallons tank with internal floating roof control, storing either gasoline, gasoline/ethanol blends, or diesel.	1/1/1992	FGMACT6B, FGGASNSPS
EUTANK56	Tank 56- 1,355,000 gallons tank with internal floating roof control, storing either gasoline, gasoline/ethanol blends, or diesel.	1/1/1993	FGMACT6B, FGGASNSPS
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 336.1290.			

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
FGGASNSPS	Three petroleum products storage tanks, each equipped with an internal floating roof, and NSPS-subject. Emissions include landings (3 events/year/tank) and cleanings.	EUTANK12, EUTANK22, EUTANK56

The following conditions apply to:
FGGASNSPS

DESCRIPTION: Three petroleum products storage tanks, each equipped with an internal floating roof, and NSPS-subject. Emissions include landings (3 events/year/tank) and cleanings.

Emission Units: EUTANK12, EUTANK22, EUTANK56

POLLUTION CONTROL EQUIPMENT: Each tank is equipped with an internal floating roof.

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

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 Kb, as they apply to FGGASNSPS. **(40 CFR Part 60, Subparts A & Kb)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. Any storage vessel holding organic liquid having true vapor pressure of more than 0.75 psia, but less than 11 psia in FGGASNSPS shall be 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 roof and the vessel wall. **(R 336.1604(1)(b), 40 CFR 60.112b(a)(1))**
2. The seal or any seal fabric of the emission units in FGGASNSPS shall have no visible holes, tears or other nonfunctional openings when storing organic liquid having true vapor pressure of more than 0.75 psia, but less than 11 psia. **(R 336.1604(1)(b), 40 CFR 60.112b(a)(1))**
3. The permittee shall equip all emission units within FGGASNSPS with covers that completely cover all openings except for those which are no larger than necessary to allow safe clearance for the floating roof when storing organic liquid having true vapor pressure of more than 0.75 psia, but less than 11 psia. The openings shall be covered at all times except when in actual use. **(40 CFR Part 60.112b(a)(1)(iii thru ix))**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. After installing the control equipment required to meet §60.112b(a)(1) (permanently affixed roof and internal floating roof), each owner or operator of any storage vessel holding organic liquid having true vapor pressure of more than 0.75 psia, but less than 11 psia, shall:

- 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 §60.115b(a)(3). **(40 CFR 60.113b(a)(2))**
 - c. For vessels equipped with a double-seal system as specified in §60.112b(a)(1)(ii)(B):
 - (1) Visually inspect the vessel as specified in paragraph (a)(4) of §60.113b(a)(3) at least every 5 years;
or
 - (2) Visually inspect the vessel as specified in paragraph (a)(2) of §60.113b(a)(3). **(40 CFR 60.113b(a)(3))**
 - d. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs (a)(2) and (a)(3)(ii) of §60.113b(a)(4) and at intervals no greater than 5 years in the case of vessels specified in paragraph (a)(3)(i) of §60.113b(a)(4). **(40 CFR 60.113b(a)(4))**
 - e. Notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs (a)(1) and (a)(4) of §60.113b(a)(5) to afford the Administrator the opportunity to have an observer present. If the inspection required by paragraph (a)(4) of §60.113b(a)(5) is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Administrator at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation, or by express mail so that it is received by the Administrator at least 7 days prior to the refilling. **(40 CFR 60.113b(a)(5))**
-
2. The permittee shall keep readily accessible records that show the dimensions of each storage vessel and an analysis that show the capacity of the storage vessel. The records shall be kept as long as the storage vessel remains in operation. **(40 CFR 60.110b, 40 CFR 60.116b)**
 3. The owner or operator of each storage vessel in FGGASNSPS shall maintain a record of the volatile organic liquid (VOL) stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. **(40 CFR 60.116b(c))**
 4. The owner or operator of each storage vessel in FGGASNSPS shall notify the Administrator within 30 days when the maximum true vapor pressure of the liquid exceeds 5.2 KPa (0.75 psia) maximum for vessels equal to or greater than or equal to 151 m³ (950 bbl). **(40 CFR 60.116b(d))**

VII. REPORTING

1. The owner or operator of each storage vessel in FGGASNSPS holding organic liquid having true vapor pressure of more than 0.75 psia, but less than 11 psia, as specified in 40 CFR 60.112b(a), shall keep records and furnish reports as required by paragraphs (a), (b), or (c) of §60.113b depending upon the control equipment installed to meet the requirements of §60.115b. The owner or operator shall keep copies of all reports and records required by §60.113b, except for the record required by (c)(1), for at least 5 years. The record required by (c)(1) of §60.115b will be kept for the life of the control equipment. **(40 CFR 60.115b)**
 - a. After installing control equipment in accordance with §60.112b(a)(1) (fixed roof and internal floating roof), the owner or operator shall meet the following requirements:
 - (1) Furnish the Administrator with a report that describes the control equipment and certifies that the control equipment meets the specifications of §60.112b(a)(1) and §60.113b(a)(1). This report shall be an attachment to the notification required by §60.7(a)(3).
 - (2) Keep a record of each inspection performed as required by §60.113b (a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
 - (3) If any of the conditions described in §60.113b(a)(2) are detected during the annual visual inspection required by §60.113b(a)(2), a report shall be furnished to the Administrator within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
 - (4) After each inspection required by §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in §60.113b(a)(3)(ii), a report shall be furnished to the Administrator within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of §61.112b(a)(1) or §60.113b(a)(3) and list each repair made.

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

1. All openings on storage vessels in FGGASNSPS except stub drains shall be equipped with covers, lids, or seals when storing organic liquid having true vapor pressure of more than 1.5 psia, but less than 11 psia such that the following conditions are met: **(R 336.1604(2))**
 - a. The cover, lid, or seal is to be maintained in the closed position at all times, except when in actual use. **(R 336.1604(2)(a))**
 - b. Automatic bleeder vents are closed at all times, except when the roof is floated off, or landed on, the roof leg supports. **(R 336.1604(2)(b))**
 - c. Rim vents, if provided, are set at the manufacturer's recommended setting or are set to open when the roof is being floated off the roof leg supports. **(R 336.1604(2)(c))**
2. The permittee shall not store any organic compound with a true vapor pressure (as defined in R 336.1120(i)) of 11 or more psia at actual storage conditions. **(R 336.1605)**
3. The permittee shall comply with all applicable provisions of Rule 604. **(R 336.1604)**

**MALFUNCTION
ABATEMENT
PLAN**

FOR

**BUCKEYE
RIVER ROUGE
TERMINAL**

January 2015

TABLE OF CONTENTS

I.	SUMMARY	1
II.	RESPONSIBILITY OF PROGRAM OVERSIGHT	1
III.	DESCRIPTION OF LOADING RACK INSPECTION AND MAINTENANCE PROGRAM.....	1
IV.	VRU MALFUNCTION PLAN.....	2

Attachment 1	River Rouge Terminal Vapor Recovery Unit (VRU) Monitoring and Inspection Plan
Attachment 2	VRU Spare Parts
Attachment 3	Jordan Vapor Recovery Unit Operations & Maintenance Manual

I. SUMMARY

The vapor control system consists of two major parts the vapor collection system which collects the vapors from the trucks and the vapor recovery unit (VRU), which treats the gasoline vapors. The vapor collection system is the piping that connects to the trucks and passes vapors to the VRU for treatment.

The Buckeye River Rouge Terminal has a Jordan VRU that recovers vapors generated during the gasoline and distillate tank truck loading process that occurs at the facility loading rack. The control system is installed and operated in a manner to ensure compliance with air permit conditions. During the loading process, the VRU provides a signal to the loading rack permitting the loading of products into the tanker trucks. If the VRU is not operating (or has malfunctioned) a permissive is not sent to the loading rack and product cannot be loaded. This system programming ensures that loading without proper vapor controls is not conducted at the facility.

This plan is required ROP-B2987-2008a EULOADINRACK Condition III.5.

Per R336.1911, the Malfunction Abatement Plan must include the following:

- (a) A complete preventative maintenance program, including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
- (b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
- (c) 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.

II. RESPONSIBILITY OF PROGRAM OVERSIGHT

The terminal manger is responsible for the development, implementation, and oversight of the vapor control system preventative maintenance program. The terminal manager or the maintenance operator will direct trained Buckeye or contractor personnel to perform the inspections, maintenance and repair on the unit.

III. DESCRIPTION OF LOADING RACK INSPECTION AND MAINTENANCE PROGRAM

The preventative maintenance program is detailed in the River Rouge Terminal Vapor Recovery Unit (VRU) Monitoring and Inspection Plan required by 40 CFR 63 Subpart BBBB and included as Attachment 1. Inspection and maintenance records are maintained at the Terminal.

A list of spare parts maintained at the Terminal is included as Attachment 2. The primary VRU contractor also maintains an inventory of spare parts.

The Terminal also completes inspections of the loading rack using sight, sound and smell as detection methods. Records of these inspections are also maintained at the Terminal.

IV. VRU MALFUNCTION PLAN

Malfunctions and corrective actions are detailed in the River Rouge Terminal Vapor Recovery Unit (VRU) Monitoring and Inspection Plan required by 40 CFR 63 Subpart BBBBBB and included as Attachment 1.

The VRU is interlocked with the rack loading. If the VRU shuts down for any reason, a yellow light at the rack will flash to alert the driver the VRU is not working; the driver will then notify the operator. The operator is also paged when the VRU shuts down, the page continues until the operator has acknowledged it. If the operator cannot resolve the problem, he is to call the VRU contractor immediately. No gasoline loading is permitted when the VRU is not operating.

The Operation and Maintenance Manual (O&M) provided by the manufacturer is used to regularly maintain the system and ensure the system is in proper working order. The O&M Manual should be referenced for additional detail on servicing and inspecting this unit. The purpose of this plan is to provide a general summary of the unit and preventative maintenance. The O&M Plan provided by the manufacturer is included as Attachment 3.

ATTACHMENT #1

**RIVER ROUGE TERMINAL
VAPOR RECOVERY UNIT (VRU)
MONITORING AND INSPECTION PLAN**

**Buckeye
River Rouge Terminal
Vapor Recovery Unit
(VRU) Monitoring and
Inspection Plan**

January 2015

BACKGROUND

This Monitoring and Inspection Plan (MIP) meets the requirements of the Gasoline Distribution Generally Achievable Control Technology (GD-GACT) rule (40 CFR 63.11092(b)(1)(i)(B)(2) (i to iv). This plan summarizes site specific operating parameter conditions that would be considered malfunctions of the carbon adsorption system during the inspections or automated monitoring performed under paragraphs (b)(1)(i)(B)(2)(i) through (iii) of the regulation. The plan describes the specific corrective actions that will be taken to address any malfunction, and defines what is considered to be a timely repair for each potential malfunction.. This plan will be fully implemented by the compliance due date of January 10, 2011.

Malfunctions that are discovered shall not constitute a violation of the emission standard in § 63.11088(a) if corrective actions as described in the monitoring and inspection plan are followed. The site owner or operator must:

- (i) **Initiate corrective action to determine the cause of the problem within 1 hour;**
- (ii) **Initiate corrective action to fix the problem within 24 hours;**
- (iii) Complete all corrective actions needed to fix the problem as soon as practicable consistent with good air pollution control practices for minimizing emissions;
- (iv) Minimize periods of start-up, shutdown, or malfunction; and
- (v) Take any necessary corrective actions to restore normal operation and prevent the recurrence of the cause of the problem.

Emissions Unit

Description:	Vapor Recovery Unit	Back up Control Device
Maximo ID:	VRU-1	Bladder Tank
Facility:	River Rouge Terminal	
Location	River Rouge, MI	
Gasoline Loading Rack throughput greater than 250,000 gpd	Yes	

Applicable Regulation, Emission Limit, and Monitoring Requirements

Control Technology:	VRU model #: JT-120-130-3000-3 0-VP2660-12I-8R-12V
Air Permit Number:	MI-ROP-B2987-2008
Permit Condition for VRU Emission Limits:	EULODGING RACK I.1
Permitted Emission Limits: mg per liter of gasoline loaded	VOC Permit Limit: 10 mg per liter gasoline loaded
GD GACT Emissions Standard	80 mg per liter gasoline loaded
Most Recent VRU Stack Test date and result	Due June 2015 <10 mg/l of gasoline loaded

FACILITY DESCRIPTION

The Buckeye River Rouge Terminal is equipped with a Carbon Adsorption / Gasoline Absorption Hydrocarbon Vapor Recovery Unit (VRU). Hydrocarbon vapors, generated from truck loading, enter the VRU into one of three carbon adsorbers (beds). The three carbon beds actually function as two carbon beds, as two of the three carbon beds are manifolded together and thus functions as a single bed.

Truck loading occurs into vapor tight trucks at a truck loading rack with 7 lanes. A vapor tight collection system is used to route the displaced hydrocarbon and air vapors flow from the trucks to the VRU where the hydrocarbons are adsorbed.

The air continues through the carbon bed and is vented to the atmosphere. While this carbon bed is on-line processing the hydrocarbon vapors, the other carbon bed is off-line being vacuum regenerated (i.e. cleaned). The purpose of regeneration is to restore the carbon to a level where it will effectively adsorb hydrocarbons again. The two carbon beds alternate between adsorption and regeneration at approximately 15 minute intervals.

When a carbon bed with liquid ring pump is being regenerated, the vacuum pump desorbs the hydrocarbons from the carbon. The hydrocarbon vapors, (from the carbon bed) are mixed with the vacuum pump seal fluid and are discharged to the separator / absorber.

The hydrocarbons are condensed and separated from the seal fluid in the separator and are pumped back to the terminal's gasoline storage tank. Hydrocarbons that are not condensed pass up through the packed absorber tower and are contacted by a fresh stream of gasoline which absorbs most of the remaining hydrocarbons. Any hydrocarbons that are not absorbed are routed to the on-line carbon bed.

Monitoring Requirements:

- Daily, monitor lowest maximum vacuum gauge reading during carbon bed regeneration cycle, (see # 5 below)
- Daily, check the proper valve sequencing, cycle time, gasoline flow, purge air flow, and operating temperatures (see #2 below and Appendix 1 for daily checklist)
- Monthly, monitor the VRU vent stack with a LEL meter. If using LEL meter, measure during the last 5 minutes of an adsorption cycle for each carbon bed, compare LEL meter reading versus VOC emission rate chart). Measurements shall be less than the 10 mg/l limit of the permit. (See Appendix 2 for monthly LEL documentation form)
- Semi-annually, test the automatic shutdown of the VRU and have preventative maintenance performed on the VRU by an outside contractor (see #3 below)
- Annually, test the carbon for absorption capacity (performed by outside contractor).

MONITORING AND INSPECTION PLAN:

The GD-GACT regulation requires the development of a monitoring and inspection plan, which has five parts:

1. Document the lowest maximum required vacuum gauge level and duration *{of carbon bed cycle}* needed to assure proper regeneration of the carbon beds (40 CFR 63.11092 (b)(1)(i)(B)(2)(i)).

The minimum required vacuum level can be determined by engineering analysis or from the VRU manufacturer's recommendation (in the operation and maintenance manual for the VRU). Typically, this level is - 27 inches of mercury (Hg). The carbon bed regeneration cycle is 15 minutes per manufactures specifications.

2. Daily, document the proper valve sequencing, cycle time, gasoline flow, purge air flow, and operating temperatures. Verification shall be through visual observation, or automated alarm or shutdown system that monitors and records system operation. (40 CFR 11092(b)(1)(i)(B)(2)(ii))

This facility conducts daily visual observations on the VRU using a checklist for various operating parameters. Each checklist must also include:

- **Proper valve sequencing (yes/no). Most VRUs are programmed to shut down if proper valve sequencing fails.**
- **Cycle time in minutes (typically, programmed for 15 minutes)**
- **Gasoline supply and return flow (pump pressures)**
- **Purge air flow (valve opening at proper time and proper rate)**
- **Operating temperatures**

See Appendix 1 for daily VRU checklist that incorporates all of the operating parameters listed above. All documents must be kept for 5 years.

3. Semi-annual preventative maintenance inspections shall be performed on the VRU according to the recommendations of the manufacturer. (40 CFR 63.11092(b)(1)(i)(B)(2)(iii))

Buckeye utilizes a 3rd party contractor, to perform semi-annual (at a minimum) VRU maintenance. Keep any records generated by the contractors during the preventative maintenance inspection onsite for 5 years.

4. Malfunctions and associated corrective actions (40 CFR 63.11092(b)(1)(i)(B)(2)(iv)):

Table 1 lists the indicators and associated corrective actions to be taken for specific malfunctions.

Table 1
OPERATING PARAMETERS, MALFUNCTIONS AND
ASSOCIATED CORRECTIVE ACTIONS

Operating Parameter Indicators	Malfunction Trigger and Corrective Action Description (see flow diagram in Appendix 4)
OPI 1 - Vacuum Gauge Level	<p>A malfunction occurs when the regenerating carbon bed vacuum level fails to reach -26 inches of Hg (per third party contractor recommendation) and verified by a second operating parameter, which is a current LEL reading greater than 20% (90% of the permit limit). This operating condition confirms a performance problem.</p> <p>The following actions are to be taken when the OPI 1 is not maintained:</p> <ol style="list-style-type: none"> 1. Stop truck loading and cycle carbon beds twice with no VOC load to beds and then take vacuum gauge readings. If they still do not reach -26 inches of Hg then go to step 2, otherwise resume normal operation. 2. Upon noting a vacuum level of -26 inches Hg or less, take an LEL reading of both carbon beds during absorption cycle within 1 hour. Contact terminal manager immediately, document date, time and operating parameter reading (LEL and vacuum) for both beds. If both beds are under -26 inches Hg follow steps #2 thru #5. If only one bed is under -26 inches Hg follow steps #6 thru #9. 3. If neither carbon bed reaches -26 inches Hg or greater, and then continue taking LEL reading on an hourly basis. 4. If LEL readings are <u>under</u> 17% (75% of permit limit) continue hourly monitoring and troubleshooting. Contact VRU maintenance contractor if cannot be resolved in 24 hours. <ol style="list-style-type: none"> a. If LEL readings continue to increase, reduce loading rates. Continue hourly LEL readings. b. If LEL readings continue to increase at reduced rate,

	<p>immediately shut down loading rack.</p> <p>c. If LEL readings hold for 3 hours, document the new operating rate. Monitor LEL on daily basis at this new operating rate until additional troubleshooting/adjustments/repairs can be made. A timely repair would be less than 10 days.</p> <p>5. If LEL readings are <u>between</u> 17% to 20% (75% - 90% of permit limit) reduce loading rate and continue hourly monitoring and troubleshooting. Contact VRU maintenance contractor if cannot be resolved in 24 hours.</p> <p>a. If LEL readings continue to increase at reduced rate, immediately shut down loading rack.</p> <p>b. If LEL readings hold for 3 hours, document the new operating rate. Monitor LEL on daily basis at this new operating rate until additional troubleshooting/adjustments/repairs can be made. A timely repair would be less than 10 days.</p> <p>6. If LEL reading is <u>over</u> 20% (90% of permit limit), immediately shut down rack. Go to step #10.</p> <p>7. If only one bed has proper vacuum level, but the other carbon bed does not reach -26 inches Hg on the next cycle, then begin taking LEL reading on an hourly basis.</p> <p>8. If LEL readings are <u>under</u> 17% (75% of permit limit) continue daily monitoring and troubleshooting. Contact VRU maintenance contractor if cannot be resolved in 24 hours.</p> <p>a. If LEL readings continue to increase, reduce loading rates. Continue daily LEL readings.</p> <p>b. If LEL readings continue to increase at reduced rate, immediately shut down loading rack.</p>
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	<ul style="list-style-type: none"> c. If LEL readings hold, document the new operating rate. Monitor LEL on daily basis at this new operating rate until additional troubleshooting/adjustments/re pairs can be made. A timely repair would be less than 10 days. <p>9. If LEL readings are <u>between</u> 17% to 20% (75% - 90% of permit limit) reduce loading rate and continue daily monitoring and troubleshooting. Contact VRU maintenance contractor if cannot be resolved in 24 hours.</p> <ul style="list-style-type: none"> a. If LEL readings continue to increase at reduced rate, immediately shut down loading rack. b. If LEL readings hold, document the new operating rate. Monitor LEL on daily basis at this new operating rate until additional troubleshooting/adjustments/re pairs can be made. A timely repair would be less than 10 days. <p>10. If LEL reading is <u>over</u> 20% (90% of permit limit), immediately shut down rack.</p> <p>11. Document event in Log as described in Section 5.</p> <p>12. Contact your Environmental Coordinator of this incident.</p>
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Operating Parameter Indicators	Malfunction Trigger and Corrective Action Description
<p>OPI 2 - Monthly measure the Percent LEL Reading on VRU Vent Stack using portable analyzer meeting requirements of Method 21 and calibrated prior to each use. Measurement shall be taken over the last 5 minutes of an adsorption cycle for each carbon bed</p>	<p>If the LEL reading reaches 75% of the corresponding VOC emission rate, take the following actions:</p> <ol style="list-style-type: none"> 1. Verify that all VRU operating parameters are within range using the daily checklist in Appendix 1. 2. If all are within range, the preventative maintenance contractor should be called in to check VRU (possible carbon channeling or deterioration, etc.). <p>If the LEL reading reaches the corresponding 90% (LEL reading of 20 %) of permit limit of 10 mg/l, the following actions will be taken:</p> <p>Loading Operations must be shut down immediately.</p> <ol style="list-style-type: none"> 1. Call Terminal Manager and preventative maintenance company. 2. Document event in Log as described in section 5. 3. Contact your Environmental Coordinator of this incident. <p><i>*Please note that each meter will have chart specific to that meter and calibration gas used, which will correlate the meter reading with the allowable VOC reading.</i></p>

5. Documentation of Daily Vacuum Levels, Monthly Vent Stack Readings and Malfunctions in a Written Log Book (40 CFR 63.11092(b)(1)(i)(B)(2)(v))

Daily Vacuum Gauge Reading

On a daily basis (7 days per week), the operator/technician will record the maximum vacuum level reached during the regeneration cycle on both carbon beds and document this information on the daily VRU checklist (see Appendix 1).

Monthly Vent Stack Reading

Initially, review EPA Method 21 summary in Appendix 3 to ensure that the LEL meter used meets the requirements of this regulation and the proper sampling procedure is followed, in particular whether the response time is less than 30 seconds to reach 90% of final reading.

On a monthly basis, the operator/technician will calibrate the LEL meter to methane calibration gas, take the vent stack reading according to the procedures in Appendix 3 and document this information on the monthly vent stack LEL documentation form (see Appendix 2).

Malfunction Events

If a malfunction occurs as indicated by Operating Parameter Indicators in Table 1 above document these malfunction events with a written entry into a log book or other permanent form of record. Record shall also include a description of the following:

1. Corrective action taken and whether such corrective actions were taken in a timely manner, as defined in the monitoring and inspection plan,
2. An estimate of the amount of gasoline loaded during the period of the malfunction.
3. Record of any activation of an automated Truck Rack and / or VRU alarm or shutdown system.

Malfunctions are reported in the excess emission and semi-annual monitoring reports submitted to EPA and the state delegated authority for this federal regulation.

APPENDIX 1

Daily VRU checklist

Date: _____



Dry Vacuum Pump System Daily Checklist
Jordan Vapor Recovery Unit

Parameter to Be Monitored	Unit of Measure	Range	Setpoint	Daily Reading						
				Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
1. Ambient Temperature	°F	NA	NA							
2. LT-570 Absorbent Level in V-3	%	approx. 40%	45%							
3. Vacuum Pump Discharge Pressure	psig	<5 psig	5-20 psig							
4. PI-540 Absorbent Supply Pressure	psig	30-60	30-60							
5. PI-570 Absorbent Return Pressure	psig	30-60	30-60							
6. Absorbent Return Pump Overview										
a. Any leaks?	NA		NA							
b. Any unusual noises?	NA		NA							
c. Oil level checked?	NA		NA							
7. Vacuum Pump #1 Overview										
a. Any leaks?	NA		NA							
b. Any unusual noises?	NA		NA							
c. Drive end oil checked?	NA	1/2 full	1/2 full							
d. Non-drive-end oil checked?	NA	1/2 full	1/2 full							
e. TIT-5511(Discharge Temp)	°F	<150°F	<220							
f. TIT-5510 Gas temp inside cooling jacket	°F		>130							
8. Vacuum Pump #2 Overview										
a. Any leaks?	NA		NA							
b. Any unusual noises?	NA		NA							
c. Drive end oil checked?	NA	1/2 full	1/2 full							
d. Non-drive-end oil checked?	NA	1/2 full	1/2 full							
e. TIT-5521 (Discharge Temp)	°F	<150°F	<220							
f. TIT-5520 Gas temp inside cooling jacket	°F		>130							
9. Vacuum Pump #3 Overview										
a. Any leaks?	NA		NA							
b. Any unusual noises?	NA		NA							
c. Drive end oil checked?	NA	1/2 full	1/2 full							

Date: _____

VRU Daily Compliance Checklist

Inspect each item and place a "Y" in the corresponding daily box for any item which is operating within normal parameters. Place an "N" in the box which corresponds to any item which is not operating within normal parameters. Record a value where indicated. Notify the Terminal Superintendent immediately of any discrepancies identified. Refer to the Alternative Monitoring Plan for corrective action. All corrective action must be documented in log maintained on site. Record any actions taken in response to out-of-range readings in the comment section. Sign in the appropriate daily signature section.

RECORD READINGS

			S	M	T	W	T	F	S
Observe one (1) complete regeneration cycle and record maximum carbon bed vacuum reading for each bed (Min: 26" Hg).*									
Bed A:	RECORD VALUE	MIN 26"							
Bed B:	RECORD VALUE	MIN 26"							
Note duration of cycle time: (if not min of 26" REFER TO ALTERNATIVE MONITORING PLAN FOR CORRECTIVE ACTION)									

*If minimum vacuum not reached, observe additional three (3) regeneration cycles and record readings below.

Additional cycles (only if first cycle did not meet setpoint)			S	M	T	W	T	F	S
cycle 1	Bed A:	RECORD VALUE							
	Bed B:	RECORD VALUE							
cycle 2	Bed A:	RECORD VALUE							
	Bed B:	RECORD VALUE							
cycle 3	Bed A:	RECORD VALUE							
	Bed B:	RECORD VALUE							

*If at least one (1) cycle meets the setpoint, no further action required. In NO additional cycle meets setpoint,

REFER TO ALTERNATIVE MONITORING PLAN FOR CORRECTIVE ACTION

RECORD READINGS

Pressure Readings		S	M	T	W	T	F	S
Gasoline Inlet Absorber Pressure (flow) - Top								
Was manual adjustment required?								
Document valve adjustment in corrective action log								
Temperature Readings								
Gasoline Supply Temperature (°F) - should be LESS THAN 110 °F								
Liquid Seal Temperature leaving the Heat Exchanger (°F) - should be LESS THAN 120 °F								

If temperatures are not less than setpoints, REFER TO ALTERNATIVE MONITORING PLAN FOR CORRECTIVE ACTION

Note Y if operating properly.

Visually verify the following:		S	M	T	W	T	F	S
Proper valve sequencing - did valves sequence and unit stayed in operation? IF NO REFER TO ALTERNATIVE MONITORING MANUAL FOR CORRECTIVE ACTION								
CYCLE TIME Visually observe and note cycle time. IF SETPOINT NOT MET REFER TO ALTERNATIVE MONITORING MANUAL								
CEM Start Mode Setpoint:								
Remote Start Setpoint:								
PURGE AIR FLOW During regeneration cycle, confirm vacuum level slightly decreases when purge air valve opens. Vacuum level should be between 26" and 27" (site specific, may be 28-29) when purge air valve opens. If during purge air, vacuum is outside of setpoint range, manually adjust valve to between setpoint range								
Note Vacuum Level								
Was manual adjustment of purge flow required? DOCUMENT VALVE ADJUSTMENT IN CORRECTIVE ACTION LOG								

ONCE PER MONTH VOC Measurement from Outlet of Beds		S	M	T	W	T	F	S
Bed A:	RECORD VALUE							
Bed B:	RECORD VALUE							

Measure VOCs from outlet of carbon bed. Record over last 5 min of an adsorption cycle for each bed, document highest VOC concentration

Operator's Remarks

Day	Init.	Date	Time	Tank Volume
Sun				
Mon				
Tues				
Wed				

APPENDIX 2

Monthly vent stack LEL documentation form

**BUCKEYE RIVER ROUGE TERMINAL
MONTHLY VENT STACK READING REPORT**

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
Date:												
Time of Day												
Inspector												
Monthly vent stack reading – Bed A												
Monthly vent stack reading – Bed B												

APPENDIX 3

EPA Method 21 Summary

EPA Method 21 Procedure for Sampling VRU Vent Stacks

Summary of Method:

A portable instrument is used to detect VOC levels from Vapor Recovery Unit (VRU) vent stacks.

Procedure for Monitoring VOC Levels in VRU Vent Stacks

Equipment -- Ensure that the unit being used meets the following requirements:

1. It must be capable of detecting the compounds being processed by the VRU.
2. The unit must be capable of measuring the leak concentration specified in the permit. In this case, it is VOCs.
3. The scale on the instrument shall be readable to +/- 2.5% of the specified leak concentration.
4. **The response time of the handheld unit must be within 30 seconds to reach 90% of final reading.**
5. The unit must have an electrically driven pump to ensure a constant flow rate for the sample to be provided to the detector.
6. The probe shall not exceed ¼" outside diameter.
7. The instrument shall be intrinsically safe as defined by NEC/NFPA.
8. Two gas mixtures are required for calibration: zero gas (less than 10 ppm VOCs) and a calibration gas (reference gas, usually propane) with a known concentration of VOCs.
9. You may use a non-reference gas for calibration purposes, but a conversion must be determined in order to give reference compound (propane) results.

Sample Collection and Recordkeeping:

1. Start up the instrument according to the manufacturer's instructions for recommended warmup period and preliminary adjustments.
2. Be sure to also "zero" the unit, an internal calibration procedure with the zero gas. Calibrate the instrument with the reference compound as specified in the operating manual for your instrument. Adjust the instrument meter readout to correspond to the calibration gas value.
3. For Open-End Lines/Valves, you must place the probe tip at approximately the center of the opening to the atmosphere.
4. The VOC measurement must be taken during the LAST 5 minutes of the adsorption cycle for each carbon vessel, and you must record the highest VOC reading taken during that 5 minute period.
5. The readings for both beds must be taken during a time when a truck is loading gasoline, and the readings are to be taken once/month.
6. Readings for both beds must be recorded on the Monthly Vent Stack Reading Report.

APPENDIX 4

Malfunction Trigger and Corrective Action Description Flow Diagram

Operating Parameter OPI 1
Vacuum Gauge Level
Flow Diagram (steps 2-11)
after cycling beds twice with no truck loading

ATTACHMENT #2

VRU SPARE PARTS

Attachment #2

VRU Spare Parts List

1. Product Supply Failsafe MOV
2. 2 small MOVs
3. 2 large MOVs
4. Spare Gauges

ATTACHMENT #3

**JORDAN VAPOR RECOVERY UNIT
OPERATIONS & MAINTENANCE MANUAL**

UNDER SEPARATE COVER

Date: _____



Dry Vacuum Pump System Daily Checklist
Jordan Vapor Recovery Unit

d. Non-drive-end oil checked?	NA	1/2 full	1/2 full						
e. TIT-5521 (Discharge Temp)	°F	<150°F	<220						
f. TIT-5520 Gas temp inside cooling jacket	°F		>130						
10. Vent Emissions Monitor (CEM)									
a. F-1 Sample flow Indicator	SCFH	1.5-2	1.5-2						
b. Reading on CEM analyzer readout	%	per permit	per permit						
c. FI-2 (zero gas flow)	SCFH	0	1.5-2						
d. FI-3 (span gas flow)	SCFH	0	1.5-2						
11. Carbon Bed Vacuum									
a. Highest vacuum observed on V-1	"Hg Vac.	25-27"	25-27"						
b. Highest vacuum observed on V-2	"Hg Vac.	25-27"	25-27"						
c. Time to break vacuum on PIT-520	seconds	60-80	60-80						
d. Time to break vacuum on PIT-530	seconds	60-80	60-80						
12. Absorbent Pressures and Flows									
c. FIT-540 Absorbent supply flow	gpm	250-280	365-380						
b. TE-540 Absorbent supply temperature	°F	<100	<90						
d. PI-540 Absorbent supply pressure	psig	30-60	30-60						
13. Operator Interface Panel									
a. Any warnings?	NA		NA						
b. Variable Frequency Drive Check?	NA		NA						
14. Absorbent Supply Pump Overview									
a. Any leaks?	NA		NA						
b. Any unusual noises?	NA		NA						
c. Oil level checked?	NA		NA						
15. PenGUIn Panel									
a. Any warnings?	NA		NA						
16. Operator's Initials									