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

B907373269			
FACILITY: MPLX Terminals LLC - Niles Terminal		SRN / ID: B9073	
LOCATION: 2216 S. Third St., NILES		DISTRICT: Kalamazoo	
CITY: NILES		COUNTY: BERRIEN	
CONTACT: Will Wallace , Environmental Engineer		ACTIVITY DATE: 10/19/2023	
STAFF: Chance Collins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR	
SUBJECT: Scheduled inspection for FCE and Stack test observation			
RESOLVED COMPLAINTS:			

On October 19, 2023, AQD staff traveled to Berrien County to perform an inspection and observe a scheduled stack test of the MPLX Terminal LLC – Niles Facility. The purpose of the inspection was to determine the facility's compliance with MI-ROP-B9073-2019 and applicable state and federal air pollution control regulations 40 CF Part 63 Subparts A and BBBBBB (Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities), and 40 CFR Part 60 Subparts A and K.

The AQD is not delegated to enforce the federal NESHAP for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities as specified in 40 CFR Part 63 Subparts A and BBBBBB,

The facility consists of two adjacent petroleum product terminals (North and South) located at 2216 and 2140 South Third Street which MPLX both owns and operates. The facility receives petroleum products in large batches via the Wolverine Pipeline that get stored in numerous above ground storage tanks. Products received via pipeline include gasoline, diesel fuel, and kerosene. Products received via tanker truck include ethanol, red dye, wholesale gas additive, lubricity, and conductivity.

AQD staff arrived on site at 9:05 a.m. to overcast conditions with a temperature of 54° F, and a south wind at 10 mph. There were no noticeable odors upon arrival.

AQD staff met with Will Wallace (Environmental Engineer), who answered all questions and escorted staff around the site. The following discusses the results of the on-site inspection and review of records:

Pollutant	Limit	Time Period/Operating Scenario	Equipment
Total Hazardous Air Pollutants (HAPS)	24.9 tons Actual: 2.33 tons	12-month rolling time period as determined at the end of each calendar month	Sourcewide
Single HAP	9.9 tons		Sourcewide

Source-Wide Conditions

Actual: 0.71 tons	12-month rolling time period as determined at the end of each calendar month	
----------------------	--	--

Facility appears to be in compliance.

EUTK80-8

Description: 72,390 barrel (3,040,380 gal) capacity above ground cone roof storage tank at South Terminal.

Flexible Group ID: FGTANKFARM, FGFRTANKS, FGMACT-BBBBBB

POLLUTION CONTROL EQUIPMENT: Fixed cone roof

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. If the true vapor pressure of the petroleum liquid being stored is equal to or greater than 1.5 psia, but not greater than 11.1 psia, EUTK80-8 shall be equipped with an internal floating roof, a vapor recovery system or their equivalent. (40 CFR 60.112 (a)(1))

2. If the true vapor pressure of the petroleum liquid being stored is greater than 11.1 psia, EUTK80-8 shall be equipped with a vapor recovery system or its equivalent. (40 CFR 60.112(a)(2))

Facility appears to be in compliance.

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. The permittee shall maintain a record of each petroleum liquid stored, the period stored, and the maximum true vapor pressure of that liquid during the respective storage period. (40 CFR 60.113(a))

Facility appears to be in compliance.

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))

Facility appears to be in compliance.

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. EUTK80-8 shall comply with all applicable provisions set forth in 40 CFR Part 60 Subparts A and K. (R 336.1213(3))

FGLOADRACKS

DESCRIPTION: Loading racks at the North and South Terminals, and the portable combustor that is the backup control.

Emission Unit: EURACK-SOUTH, EURACK-NORTH, EUVCU-PORT

POLLUTION CONTROL EQUIPMENT: Primary vapor control system (VCS) - carbon adsorption. Secondary VCS - John Zink or RANE portable vapor combustor (EUVCU-PORT).

Emission Limits:

Pollutant	Limit	Time Period/Operating Scenario	Equipment
voc	35 mg*	per liter of organic compounds loaded, averaged over six hours during which at least 300,000	EURACK-SOUTH With primary VCS in use

		liters of gasoline are loaded.	
voc	80 mg**	per liter of organic compounds loaded, averaged over six hours during which at least 300,000 liters of gasoline are loaded.	EURACK-NORTH With primary VCS in use
VOC	35 mg ² *	per liter of organic compounds loaded, averaged over six hours during which at least 300,000 liters of gasoline are loaded.	EURACK-SOUTH or EURACK-NORTH With secondary VCS
Opacity	0% ²	6 minutes	EUVCU-PORT

* Equivalent to 0.3 pounds per 1,000 gallons of organic compounds loaded.

** Equivalent to 0.7 pounds per 1,000 gallons of organic compounds loaded.

Facility appears to be in compliance.

PROCESS/OPERATIONAL RESTRICTION(S)

1. CONTROL SYSTEM:

a. To ensure proper operation of the Primary VCS and compliance with R 336.1702(b), the average maximum vacuum level of each regeneration cycle shall be equal to or greater than 26 inches of Hg over a 6-hour

period during active gasoline loading and the carbon beds shall be regenerated at least once every 15 minutes, except for periods of maintenance. (R 336.1213(2), 40 CFR 64.6(c)(3), 40 CFR 64.7(a), 40 CFR 64.7(c)(1))

b. If proper regeneration of a carbon bed does not occur at least once every 15 minutes during active loading, except for periods of maintenance, and if the average maximum vacuum specified in condition III.1.a above is not achieved, the permittee shall immediately cease loading of gasoline at that rack until proper regeneration of the carbon bed is restored or until the Secondary VCS is brought on-line. (R 336.1213 (2))

c. The permittee shall not load gasoline at the loading racks unless either the Primary or Secondary VCSs are installed and operating properly.2 (R 336.1702(a), R 336.1910, 40 CFR 63.11088(a))

d. The permittee shall operate EUVCU-PORT as recommended by the manufacturer. (R 336.1213(2))

e. The permittee shall only use propane or natural gas for maintaining a flame in EUVCU-PORT. (R 336.1213(2))

f. The permittee shall maintain and operate the pressure monitoring system and associated equipment according to the manufacturer's recommendations. (40 CFR 64.7(b))

g. As specified in R 336.1627(9), the Primary VCS shall be operated to prevent gauge pressure in the delivery vessel from exceeding 0.6 pounds per square inch and to prevent vacuum from exceeding - 0.2 pounds per square inch gauge. (R 336.1702(d))

2. GASOLINE TANK TRUCK LOADING/UNLOADING:

a. As specified in R 336.1627, the permittee shall not operate the loading racks unless the following provisions are met: (R 336.1702(d))

i. As specified in R 336.1627(5), there shall be no visible liquid leaks from the gasoline tank truck or vapor collection system, except when the disconnection of dry breaks in liquid lines produces a few drops of liquid. (R 336.1702(d))

ii. As specified in R 336.1627(7), there shall be no gas detector reading greater than or equal to 100% of the lower explosive limit at a distance of one inch from the location of the potential leak in the vapor recovery unit. Leaks shall be detected by a combustible gas detector using the test procedures described in R 336.2005, as described in V.1. (R 336.1702(d), 40 CFR 64.6(c)(2))

iii. As specified in R 336.1627(8), there shall be no visible leaks, except from the disconnection of bottom loading dry breaks and from raising top loading vapor heads, where a few drops are permitted. (R 336.1702(d))

b. The permittee shall act to ensure that the terminal loading rack and the tank truck vapor control systems are connected during loading of a gasoline tank truck at the affected facility. (R 336.1213(2))

Facility appears to be in compliance.

DESIGN/EQUIPMENT PARAMETER(S)

1. Carbon adsorption shall be the Primary VCS for the loading racks. (R 336.1702(b))

2. The permittee shall only use EUVCU-PORT to control emissions from the loading racks during maintenance or malfunction of the primary VCS. This includes maintenance or malfunction of the receiving tank for gasoline recovered by the primary VCS.2 (R 336.1201(3))

3. The loading racks shall utilize submerged fill pipes for transferring liquids from stationary vessels into delivery vessels. (R 336.1706(1))

4. Each delivery vessel loaded with organic compounds having a true vapor pressure of more than 1.5 psia, other than crude oil or condensate oil, shall be equipped, maintained, or controlled with all of the following: (R 336.1706(3))

a. An interlocking system or procedure to ensure that the vapor-tight collection line is connected before any organic compound can be loaded. (R 336.1706(3)(a))

b. A device to ensure that the vapor-tight collection line shall close upon disconnection so to prevent the release of organic vapor. (R 336.1706(3)(b))

c. 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. (R 336.1706(3)(c))

d. Pressure-vacuum relief valves that are vapor-tight and set to prevent the emission of displaced organic vapor during the lo

tch openings that are kept closed and vapor-tight during the loading of the delivery vessel. (R 336.1706(3)(e))

Facility appears to be in compliance.

TESTING/SAMPLING

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

1. The permittee shall test for vapor leaks in the vapor control system as described in R 336.1627(6) using the methods described in R 336.2005 at least once each calendar quarter. The results of each leak test shall be maintained on file. (R 336.1213(3), 40 CFR 64.6(c)(1))

2. If the permittee commences to load gasoline products again through EURACK-NORTH instead of just distillates, then the permittee shall conduct emissions testing on the Primary VCS at EURACK-NORTH for VOCs and control efficiency in accordance with 40 CFR Subpart XX using EPA Methods 2A, 21, and 25B within 6 months of that date: (R 336.1213(3))

c. The permittee shall submit a complete test protocol to the AQD for approval at least 30 days prior to the anticipated test date. (R 336.1213(3))

d. The permittee shall notify the District Supervisor or the Technical Programs Unit no less than 7 days prior to the anticipated test date. (R 336.12001(3))

e. The permittee shall submit a complete test report of the test results to the District Supervisor or the Technical Programs Unit within 60 days following the last date of the test. (R 336.12001(4))

3. The permittee shall conduct emissions testing on the Primary VCS at EURACK-SOUTH for VOCs and control efficiency in accordance with 40 CFR 60 Subpart XX using EPA Methods 2A, 21, and 25B. The test shall be performed once within the effective dates of the permit. (R 336.1213(3))

a. The permittee shall submit a complete test protocol to the AQD for approval at least 30 days prior to the anticipated test date. (R 336.1213(3))

b. The permittee shall notify the District Supervisor or the Compliance Support Unit no less than 7 days prior to the anticipated test date. (R 336.12001(3))

c. The permittee shall submit a complete test report of the test results to the District Supervisor or the Compliance Support Unit within 60 days following the last date of the test. (R 336.12001(4))

Facility appears to be in compliance.

MONITORING/RECORDKEEPING

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

1. For each scheduled work day that the Primary VCS is in use the permittee shall monitor the carbon bed pressure using an electronic recording device (or equivalent data recording device approved by the District Supervisor) and record any deviations in static pressure or regeneration frequency. An excursion occurs when the maximum vacuum level of each regeneration cycle does not average a minimum of 26 inches of Hg over a 6-hour period during gasoline loading and/or unloading operations and the load rack is not immediately shutdown. (R 336.1213(3), 40 CFR 64.6(c)(1))

2. The permittee shall keep a record consisting of the date, time, and duration of each malfunction of each Primary VCS or scheduled maintenance of each Primary VCS (or the receiving tank for gasoline recovered from the primary VCS), which results in Primary VCS downtime. (R 336.1213(3))

3. The permittee shall maintain a written record of the dates and hours of operation of EUVCU-PORT and on which loading rack the unit is used.2 (R 336.1201(3))

4. The permittee shall maintain a written record of all replacements, maintenance, repairs, and/or additions made to the VCSs. (R 336.1213(3))

5. The permittee shall use a thermocouple or other device to continuously monitor for the presence of a pilot flame at all times that the Secondary VCS is in use. An excursion shall be defined as the absence of the pilot flame during gasoline loading and/or unloading operations and the load rack is not immediately shutdown. (40 CFR 64.6(c)(1), 40 CFR Part 63 Subpart BBBBBB))

6. A copy of the inspection and maintenance plan for the Primary VCS shall be kept on-site and made available to the AQD staff upon request. (R 336.1213(3))

7. Upon detecting an excursion or exceedance, the permittee shall restore operation of EU-RACK-SOUTH or EURACK-NORTH to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). (40 CFR 64.7(d))

8. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data

recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. (40 CFR 64.6(c)(3), 64.7(c))

Facility appears to be in compliance.

All reports are reviewed upon receipt and were received in a timely manner. Facility appears to be in compliance.

All stacks appear to be within applicable requirements.

OTHER REQUIREMENT(S)

1. The permittee shall, at all times, maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. (40 CFR 64.7(b))

2. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. (40 CFR 64.7(e))

3. The permittee shall comply with all applicable requirements of 40 CFR Part 64. (40 CFR 64.7(c)(3))

4. The permittee shall comply with all applicable provisions of R 336.1627 and R 336.1706.2 (R 336.1201(3))

5. The permittee shall maintain written procedures for proper operation of the Primary and Secondary VCSs and the terminal loading racks. These written procedures shall be accessible at the terminal upon AQD request. (R 336.1706(4))

6. The permittee shall certify that each gasoline tank truck utilized at the affected facility is equipped with vapor collection equipment that is compatible with the terminal's vapor control system and that each gasoline tank truck is certified as specified in R 336.1627(2). (R 336.1213(2))

7. As specified in R 336.1627(10), the department may require the owner or operator of any vapor collection system subject to the provisions of subrule (6) of this rule to test the system in accordance with R 336.2005. The tests shall be conducted within 60 days following receipt of written notification from the department. Notification of

the exact time and location of the test shall be given to the department, in writing, not less than 7 days before the actual test date. Documentation of the test that states the date and location of the test, test procedures, the type of equipment used, and the results of the test shall be submitted to the department within 60 days following the last date of the test. If the time or location of the test changes for any reason, then the owner or operator shall notify the department as soon as practicable. (R 336.1702 (d))

8. As specified in R 336.1627(11), the permittee shall certify that any delivery vessel or component of a vapor collection system that fails to meet any provisions of R 336.1627 shall not be operated until the necessary repairs have been made, the vessel or vapor recovery unit retested, and the test results have been submitted to the AQD. (R 336.1702(d))

Facility appears to be in compliance.

FGTANKFARM

DESCRIPTION: All tanks at the Facility that have applicable requirements.

Emission Units: EUTK20-13, EUTK25-3, EUTK31-11, EUTK35-4, EUTK55-2, EUTK55-5, EUTK55-6, EUTK55-7, EUTK64-9, EUTK67-12, EUTK80-8, EUTK100-10, EUTKT-1

Pollutant	Limit	Time Period/Operating Scenario	Equipment
voc	53.11 tons	12-month rolling time period as determined at the	FGTANKFARM
	Actual:	end of each calendar month	
	29.84 tons		

POLLUTION CONTROL EQUIPMENT: NA

Facility appears to be in compliance.

Material	Limit	Time Period/Operating Scenario	Equipment
Gasoline	580 million gallons	12-month rolling time period as determined at the end of each calendar month	FGTANKFARM
	Actual:		
	432,528,695 gallons		

Facility appears to be in compliance.

MONITORING/RECORDKEEPING

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

1. The permittee shall calculate and record the total VOC emission rate, in tons emitted, from FGTANKFARM for each calendar month. (R 336.1213(3))

2. The permittee shall calculate and record the 12-month rolling average VOC emissions rate, in tons emitted, from FGTANKFARM, as determined at the end of each calendar month. (R 336.1213(3))

3. The permittee shall monitor and record the total gasoline throughput, in gallons, for the stationary source (South Terminal and North Terminal combined) for each calendar month. (R 336.1213(3))

4. The permittee shall monitor and record the 12-month rolling time period gasoline throughput, in gallons, for the stationary source (South Terminal and North Terminal combined), as determined at the end of each calendar month.2 (R 336.1201(3))

Facility appears to be in compliance.

All reports are reviewed upon receipt and were received in a timely manner. Facility appears to be in compliance.

FGFRTANKS

DESCRIPTION: All tanks at the Facility that have a fixed roof and are subject to R 336.1604.

Emission Unit: EUTK25-3, EUTK31-11, EUTK55-2, EUTK55-5, EUTK55-6, EUTK55-7, EUTK64-9, EUTK80-8, EUTK100-10, EUTKT-1

POLLUTION CONTROL EQUIPMENT: NA

```
I. EMISSION LIMIT(S)
```

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not store any organic compound having a true vapor pressure of more than 1.5 psia, at actual storage conditions, in any storage tanks in FGFRTANKS unless the provisions of R 336.1604 are complied with.2 (R 336.1702(d))

2. As specified in R 336.1604(1), when storing 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 storage tank in FGFRTANKS one of the following conditions must be met:

a. As specified in R 336.1604(1)(a) each subject vessel shall be capable of maintaining working pressures sufficient to prevent organic vapor or gas loss to the atmosphere at all times, except under emergency conditions.

OR

b. As specified in R 336.1604(1)(b), each subject 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 or roof edge and the vessel wall. The seal or any seal fabric shall have no visible holes, tears, or other nonfunctional openings.

OR

c. As specified in R 336.1604(1)(c), each subject vessel shall be equipped and maintained with a vapor recovery system, or other control system approved by the AQD, which recovers not less than 90% by weight of the uncontrolled organic vapor that would otherwise be emitted into the atmosphere. (R 336.1702(d))

3. When storing any organic compound having a true vapor pressure of more than 1.5 psia but less than 11 psia, at actual storage conditions, all openings, except stub drains, shall be equipped with covers, lids, or seals that meet the following requirements:

a. As specified in R 336.1604(2)(a), the cover, lid, or seal is in the closed position at all times, except when in actual use. (R 336.1702(d))

b. As specified in R 336.1604(2)(b), automatic bleeder vents are closed at all times, except when the roof is floated off, or landed on, the roof leg supports. (R 336.1702 (d))

c. As specified in R 336.1604(2)(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 336.1702(d))

Facility appears to be in compliance.

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. The permittee shall maintain a written record of the true vapor pressure, at actual storage conditions, of each fuel, dye, additive, or other substance stored in each vessel. (R 336.1213(3))

2. When storing any organic compound having a true vapor pressure of more than 1.5 psia, but less than 11 psia, at actual storage conditions, the permittee shall perform a semiannual routine inspection of each vessel to ensure compliance with R 336.1604(1) and R 336.1604(2) as required by R 336.1702(d). The permittee shall keep a record of the results of this semiannual inspection. (R 336.1213(3))

Facility appears to be in compliance.

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))

Facility appears to be in compliance.

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. Pursuant to R 336.1702(d) the permittee shall comply with all applicable provisions of R 336.1604. (R 336.1213(2))

FGBBBBBB

The AQD is not delegated to enforce the federal NESHAP for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities as specified in 40 CFR Part 63 Subparts A and BBBBBB. Compliance requirements with this regulation are cited under the Flexible Group FGMACT-BBBBBB as well as mentioned in the "Other Requirements" section of that Flexible Group in the ROP. The facility has submitted the initial notification and the notification of compliance status on time as required.

All reports are reviewed upon receipt and were received in a timely manner.

Stack Test Observation:

AQD Staff observed a portion of a RATA on the Continuous Emissions Monitoring System (CEMS) of the vapor recover unit (VRU). The VRU is a carbon Adsorption System and controls emissions associated with the truck loadout racks. The decision to install the CEMS was made by the company and was not done due to any environmental regulations. The testing was to be performed using USEPA Methods 2A, 21, 25B and Performance Specification 8. During testing, the hydrocarbon analyzer will be checked hourly for calibration drift and on an hourly basis confirm separation of methane and hydrocarbons using mixed gas standard (propane and methane). The test was to last at least 6 hours in duration with at least 300,000 liters (~80,000 gallons) of gasoline loaded during that timeframe.

The testers did calibrations of their equipment prior to the start of testing, after each hour, and then once again after the testing was complete. The testing started at 6:15 a.m. with testing to be concluded at roughly 1:30 p.m. Fuel loading is tracked by Marathon electronically. The volume of gasoline throughputs was above the required minimum. Throughout testing, the Total Hydrocarbon Average emissions after control were 0.06 ppm and Methane at 0.34 ppm.

The testing went smoothly, and the preliminary results appeared to be well within compliance of the 35 mg/l of gasoline loaded limit but an official determination will not be made until the report is received.

DATE 10/19/2023 SUPERVISOR Monica Brothers