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

September 10, 2024

PERMIT TO INSTALL
52-15A

ISSUED TO
MPLX Terminals LLC

LOCATED AT
12700 Toronto Street
Detroit, Michigan 48217

IN THE COUNTY OF
Wayne

STATE REGISTRATION NUMBER
A9831

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

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: **March 18, 2024**	
DATE PERMIT TO INSTALL APPROVED: **September 10, 2024**	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Table of Contents

COMMON ACRONYMS

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

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

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO_2e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H_2S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO_x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO_2	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**

2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**

3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**

4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**

5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**

6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**

7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**

8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.

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

10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

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

12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**

13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EULOADINGRACKS-S2	Six lane loading rack and associated vapor recovery unit. Includes use of backup, portable vapor combustion unit during extended malfunction/breakdown/maintenance of primary device. Permit: 63-04C, 52-15, 52-15A	01/01/1986 11/21/2012	NA

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

EULOADINGRACKS-S2
EMISSION UNIT CONDITIONS

DESCRIPTION

Six lane loading rack and associated vapor recovery unit. Includes use of backup, portable vapor combustion unit during extended malfunction/breakdown/maintenance of primary device. Permit: 63-04C, 52-15, 52-15A

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Activated Carbon Adsorber, Backup Portable Vapor Combustor, VACVAS

I. EMISSION LIMIT(S)

1. The permittee shall not allow the VOC emissions from the vapor control system for EULOADINGRACKS-S2 to exceed 0.084 pounds per 1000 gallons (10 mg/L) of gasoline loaded, averaged over six (6) hours during which at least 300,000 liters of gasoline are loaded. Compliance with this limit shall be considered compliance with the limits of R 336.1609(2) and 40 CFR 502(b) and (c) which have been subsumed under this streamlined requirement. **(R 336.1225, R 336.1702(a), 40 CFR 63.422(b), 40 CFR 60.502(b) and (c), R 336.1609(2))**

2. The permittee shall not allow the VOC emissions from the vapor control system for EULOADINGRACKS-S2 to exceed 0.063 pounds per 1000 gallons (7.5 mg/L) of gasoline loaded based upon a 12 month rolling time period, as determined at the end of each calendar month. **(R 336.1205(3))**

3. The permittee shall not allow the VOC emissions from the vapor control system for EULOADINGRACKS-S2 to exceed 31.2 tons per year, based upon a 12 month rolling time period, as determined at the end of each calendar month. **(R 336.1205(3))**

II. MATERIAL LIMIT(S)

1. The permittee shall not allow the gasoline throughput for EULOADINGRACKS-S2 to exceed 1,000,000,000 gallons per year, based upon a 12 month rolling time period, as determined at the end of each calendar month. **(R 336.1205(3), R 336.1227(2))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the product loading racks unless Part 55 of Michigan Act 451 of 1994, Administrative Rules 609 and 627 are met. **(R 336.1609, R 336.1627)**

2. The permittee shall not operate the product loading racks unless the vapor collection system (activated carbon adsorption system or the backup portable vapor combustion unit) is installed and operating properly. Proper operation of the backup portable vapor combustion unit includes maintaining a six-hour average minimum flame chamber (firebox) temperature of 595 degrees Fahrenheit. **(R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1910, 40 CFR 63.427(a)(3) and 40 CFR 63.427(b))**

3. The permittee shall not 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 controlled by a vapor recovery system that captures all displaced organic vapor and air by means of a vapor-tight collection line and recovers the organic vapor. Compliance with this requirement shall be considered compliance with the requirements of 40 CFR 60.502(a), which has been subsumed under this streamlined requirement. **(R 336.1609(2))**

4. Any delivery vessel located at a facility that is subject to the provisions of R 336.1609(2) shall be equipped, maintained or controlled with all of the following: **(R 336.1609(3))**
   a) An interlocking system or procedure to ensure that the vapor-tight collection line is connected before any organic compound can be loaded.
   b) A device to ensure that the vapor-tight collection line shall close upon disconnection so as to prevent the release of organic vapor.
   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.
   d) 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.
   e) Hatch openings that are kept closed and vapor-tight during the loading of the delivery vessel.

5. Permittee shall develop written procedures for the operation of all such control measures. Such procedures shall be posted in an accessible, conspicuous location near the loading device. **(R 336.1609(4))**

6. The permittee shall not operate EULOADINGRACKS-S2 unless the approved malfunction abatement plan (MAP) for the VACVAS system is implemented and maintained. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment that is serviced by the VACVAS system is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1702(a), R 336.1910, R 336.1911, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack. **(40 CFR 60.502(d))**

V. TESTING/SAMPLING

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

1. Upon request, the permittee shall verify the VOC emission rate from the vapor control system for EULOADINGRACKS-S2 by testing at owner's expense, in accordance with Department requirements. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. 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. **(40 CFR 63.425(a)(1)), R 336.1201(3))**

2. The permittee shall conduct Annual certification testing for all the cargo tank trucks loaded at the facility (pressure – vacuum test cargo tanks) in accordance with EPA Federal Reference Method 27, Appendix A, 40 CFR Part 60 for the pressure and vacuum test for the gasoline cargo tanks. **(40 CFR 63.425(e)(1))**

3. The permittee shall conduct an Annual certification for all the cargo tank trucks loaded at the facility (pressure test cargo tanks internal vapor valve) in accordance with EPA Federal Reference Method 27, Appendix A, 40 CFR Part 60 for the pressure test for the internal vapor valves. **(40 CFR 63.425(e)(2))**

See Appendix 5-S2

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep records of the EULOADINGRACKS-S2 throughput of gasoline for each calendar month and 12-month rolling time period. The permittee shall keep all records on file at the facility at the facility and make them available to the Department upon request. **(R 336.1205(3))**

2. The permittee shall keep records of the amount of organic compounds handled by the loading racks for each calendar month and 12-month rolling time period. **(R 336.1205(3))**

3. When EULOADINGRACKS-S2 is operating, the permittee shall monitor temperature in the flame chamber (firebox) in the backup portable vapor combustion unit on a continuous basis during operation to indicate proper destruction of captured emissions. Monitoring records shall be maintained in a satisfactory manner and made available to the Department upon request. **(R 336.1910)**

4. The permittee shall properly maintain the backup, portable vapor combustion unit monitoring system including keeping ready access parts for routine repair of the monitoring equipment. **(R 336.1910))**

See Appendices 3-S2 and 4-S2

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than completion of increasing the VRU stack height to a minimum of 35 feet above ground level. **(R 336.1201(7)(a))**

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVVRU-PORT	78[1]	13[1]	R 336.1225
2. SVVRU	16[1]	35[1]	R 336.1225 40 CFR 52.21 (c) & (d)
1. The exhaust gases from the stacks are not exhausted unobstructed vertically. However, the emissions from this emission unit were modeled taking the shape of the stack into account.			

IX. OTHER REQUIREMENT(S)

1. Permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 63, Subparts A and R, National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations). **(40 CFR Part 63 Subpart A and R)**

2. Permittee shall comply with all applicable requirements of Standards of Performance for New Source Stationary Sources, 40 CFR Part 60, Subparts A and XX, Standards of Performance for Bulk Gasoline Terminals. **(40 CFR Part 60 Subpart XX)**

3. Permittee who operates a bulk gasoline terminal subject to the provisions of 40 CFR Part 63, Subpart R that is also subject to 40 CFR Part 60, Subpart Kb or XX shall comply only with the provisions in each subpart that contain the most stringent control requirements for that facility. **(40 CFR 63.420(g))**

4. Permittee shall not load or unload any gasoline tank truck unless it meets the testing requirements of Michigan Administrative Rule R 336.1627. **(R 336.1627)(3))**

5. Loading of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures: **(40 CFR 60.502(e))**
   a) Permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline tank truck which is to be loaded at the facility. **(40 CFR 60.502(e)(1))**

b) Permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the facility. **(40 CFR 60.502(e)(2))**

c) Permittee shall cross check each tank identification number obtained in Condition 5(b) with the file of tank truck vapor tightness documentation within two weeks after the corresponding tank is loaded unless either of the following conditions is maintained. **(40 CFR 60.502(e)(3)(i))**

i. If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or **(40 CFR 60.502(e)(3)(i)(A))**

ii. If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross check shall be performed semiannually. **(40 CFR 60.502(e)(3)(i)(B))**

iii. If either the quarterly or semiannual cross-check provided in 40 CFR 60.502(3)(e)(i) (A) through (B) reveals that these conditions were not maintained, the permittee must return to biweekly monitoring until such time as these conditions are again met. **(40 CFR 60.502(e)(3)(ii))**

d) Permittee shall notify the owner or operator of each non vapor-tight gasoline tank truck loaded at the facility within one week of the documentation cross-check in 40 CFR 60.502(e)(3). **(40 CFR 60.502(e)(4))**

e) 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 which documents that:

i. The tank truck or railcar gasoline cargo tank meets the test requirements in §63.425(e), or the railcar gasoline cargo tank meets applicable test requirements in §63.425(i);

ii. For each gasoline cargo tank failing the test in §63.425 (f) or (g) at the facility, the cargo tank either:

A. Before repair work is performed on the cargo tank, meets the test requirements in §63.425 (g) or (h), or

B. After repair work is performed on the cargo tank before or during the tests in §63.425 (g) or (h), subsequently passes the annual certification test described in §63.425(e). **(40 CFR 63.422(c)(2), 40 CFR 60.502(e)(5))**

6. 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))**

7. Permittee shall act to assure that the terminal's and tank truck's vapor collection system are connected during each loading of a gasoline tank truck at the facility. **(40 CFR 60.502(g))**

8. 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) for equipment in EULOADINGRACKS-S2. 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 Rule 225(1) no later than one year after the due date of the plan submittal.[1] **(R 336.1225(4))**

Vapor Collection System

9. The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in delivery tank from exceeding 450 mm of water during product loading. **(40 CFR 60.502(h))**

10. 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. **(40 CFR 60.502(i))**

11. 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. **(40 CFR 60.502(j))**

12. Permittee shall repair the source of the leak within 15 calendar days after it is detected. **(40 CFR 60.502(j))**

13. Permittee shall not operate the delivery vessel which is to be controlled by a vapor collection system such as a vapor balance system or vapor recovery system unless the following conditions 15 and 16 are met. **(R 336.1627(1))**

14. The delivery vessels shall not sustain a pressure change of more than 1 inch of water in 5 minutes when pressurized to 18 inches water, gauge, or evacuated to 6 inches of water, gauge, using the test procedure described in EPA Reference Test Method 27 in 40 CFR 60 Appendix A. Compliance with these requirements shall be considered compliance with the requirements of R 336.1627(2) which have been subsumed under the streamlined requirement 40 CFR 63.425(e)(1). **(40 CFR 63.425(e)(1), R 336.1225)**

15. There shall be no visible liquid leaks from the vessel or collection system, except when the disconnection of dry breaks in liquid lines produces a few drops of liquid. **(R 336.1627(5))**

16. The permittee shall not operate any vapor collection system, either vapor balance or recovery system unless all of the provisions of R 336.1627(6) through (10) are met. **(R 336.1627(6))**

17. There shall be no gas detector reading greater than or equal to 100 percent of the lower explosive limit at a distance 1 inch from the location of the potential leak in the vapor collection system. Leaks shall be detected by a combustible gas detector using the test procedure described in R 336.2005. **(R 336.1627(7))**

18. There shall be no visible leaks, except from the disconnection of bottom loading dry breaks and from raising top loading vapor heads, where a few drops are permitted. **(R 336.1627(8))**

19. The vapor collection system shall be designed and operated to prevent gauge pressure in the delivery vessel from exceeding 0.6 pounds per square inch (422 mm of water) and to prevent vacuum from exceeding -0.2 pounds per square inch gauge (-141 mm of water). **(R 336.1627(9))**

20. Any delivery vessel or component of a vapor collection system that fails to meet any provision of the requirements of Rule R 336.1627 shall not be operated until the necessary repairs have been made, the vessel or collection system has been re-tested and the tests results have been submitted to the Division. **(R 336.1627(11))**

21. When a leak is detected, an initial attempt at repair shall be made as soon as practicable but no later than five calendar days after the leak is detected. **(40 CFR 63.424(c))**

22. Repair or replacement of the leaking equipment shall be completed within 15 days after detection of each leak except as required by 40 CFR 63.424(d). **(40 CFR 63.424(c))**

23. Delay of repair of leaking equipment will be allowed upon a demonstration to the **EPA Administrator** that repair within 15 days is not feasible. Permittee shall provide the reason(s) a delay is needed and the date by which each repair is expected to be completed. **(40 CFR 63.424(d))**

24. 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: **(40 CFR 63.424(g))**
    a) Minimize the gasoline spills. **(40 CFR 63.424(g)(1))**
    b) Clean up the spills as expeditiously as practicable. **(40 CFR 63.424(g)(2))**
    c) Cover all open gasoline containers with a gasketed seal when not in use. **(40 CFR 63.424(g)(3))**
    d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators. **(40 CFR 63.424(g)(4))**

25. Permittee shall conduct a performance test on the vapor processing system according to test methods and procedures in 40 CFR 60.503, except a reading of 500 ppm (INSTEAD OF 10,000 ppm) shall be used to determine the leaks to be repaired under 40 CFR 60.503(b). Compliance with this requirement shall be considered compliance with the requirements of 40 CFR 60.503(b), which has been subsumed under this streamlined requirement. **(40 CFR 63.425(a))**

26. Permittee shall operate the backup, portable vapor combustion unit in a manner not to go below the operating parameter value described in Condition 3 of Appendix 3-S2. **(40 CFR 63.427(b))**

27. Permittee shall comply with the applicable requirements of 40 CFR Part 61, Subpart FF, National Emission Standards for Benzene Waste Operations, as specified in paragraphs 18 and 19 of Consent Decree and any revisions thereto. **(Consent Decree No. 01-40119)**

28. Effective from the Date of Entry of the Consent Decree until its termination, MAP agrees that the Detroit Refinery Light products Terminal, herein identified as Section 2 of the Detroit Refinery, is covered by this Consent Decree. **(Consent Decree No. 01-40119)**

29. Permittee shall ensure that controls are on all subject components of the individual drain systems that are located at the Detroit Light Products Terminal and are in compliance as follows:
    a. The Truck Loading Terminal area aqueous benzene waste shall be routed through a system controlled pursuant to the requirements of 40 CFR Part 61, Subpart FF. **(Consent Decree No. 01-40119 and any revisions thereto.)**

30. The permittee shall not operate EULOADINGRACKS-S2 unless the VACVAS system is installed, maintained, and operated in a satisfactory manner. Satisfactory operation shall include but is not limited to maintaining pressure across the VACVAS system per manufacturer specifications; these specifications shall be included in the MAP, as required by SC III.6. **(R 336.1225, R 336.1702(a), R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))**

31. The permittee shall not operate EULOADINGRACKS-S2 for more than 58,900,000 gallons of gasoline per year without the VACVAS system operating consistent with the MAP (required under SC III.6). The 58,900,000 gallons per year dispensed shall include times of malfunction of the VACVAS system and general maintenance performed on the VACVAS system as allowed by the MAP. The gallon per year limit is based on a 12-month rolling time period as determined at the end of each calendar month. **(R 336.1225, R 336.1702(a), R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))**

32. The permittee shall keep, in a satisfactory manner, for EULOADINGRACKS-S2, monthly and 12-month rolling time period records of the gallons of gasoline dispensed when the VACVAS system is not operating. The permittee shall keep all records on file at the facility for a period of at least five years and make them available to the Department upon request. **(R 336.1225, R 336.1702(a), R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))**

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

APPENDICES

Appendix 3-S2. Monitoring Requirements

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in EULOADINGRACKS-S2.

1. Applicant shall perform a monthly leak inspection of all equipment in gasoline service. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. Each piece of equipment shall be inspected during the loading of a gasoline cargo tank. **(40 CFR 63.424(a))**

2. Applicant shall install, calibrate, certify, operate, and maintain according to manufacturer's specifications, a continuous emission monitoring system (CEMS) in the exhaust air stream of the vapor collection system (activated carbon adsorption system) capable of measuring organic compound concentrations. **(40 CFR 63.427(a)(1))**

3. For the backup, portable vapor combustion unit, a continuous parametric monitoring system (CPMS) capable of measuring temperature must be installed in the firebox or in the ductwork immediately downstream from the firebox in a position before any substantial heat exchange occurs. **(40 CFR 63.427(a)(3))**

Appendix 4-S2. Recordkeeping

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in EULOADINGRACKS-S2. Alternative formats must be approved by the AQD District Supervisor.

1. Monthly recordkeeping of material throughput for the Asphalt Polymer Tanks. **(R 336.1201)**

2. Permittee shall keep the tank truck vapor tightness documentation required under 40 CFR 60.502(e)(1)) in the terminal in a permanent form and it shall be made available for inspection. **(40 CFR 60.505(a))**

3. The leak inspection records shall include, as a minimum, the following information: **(40 CFR 60.505(c))**
   a) Date of Inspection. **(40 CFR 60.505(c)(1))**
   b) Findings: (may indicate no leaks discovered; or location, nature, and severity of each leak). **(40 CFR 60.505(c)(2))**
   c) Leak Determination Method. **(40 CFR 60.505(c)(3))**
   d) Corrective Action (date each leak repaired, reasons for any repair interval in excess of 15 days). **(40 CFR 60.505(c)(4))**
   e) Inspector name and signature. **(40 CFR 60.505(c)(5))**

4. Documentation of all notifications of non vapor-tight gasoline tank trucks loaded. **(40 CFR 60.505(d))**

5. Permittee shall keep records of the test results for each gasoline cargo tank loading at the facility as follows. Compliance with these requirements shall be considered compliance with the requirements of 40 CFR 60.505(b), which has been subsumed under this streamlined requirement. **(40 CFR 63.428(b))**
   a) Annual certification testing per 40 CFR 63.425(e)(1) and (2)
   b) Continuous performance testing
   c) The documentation file shall be kept up-to-date for each gasoline cargo tank loading at the facility. The documentation for each test shall include, as a minimum, the following information:
      i. Name of test
      ii. Cargo tank owner's name and address
      iii. Cargo tank identification number
      iv. Test location and date
      v. Tester name and signature
      vi. Witnessing inspector, if any: Name, signature, and affiliation
      vii. Vapor tightness repair: Nature of repair, work and when performed in relation to the vapor tightness testing
      viii. Test results: Pressure or vacuum change, mm of water, time period of test, number of leaks found with instrument and leak definition.

6. Permittee shall keep and sign a log book at the completion of each monthly leak inspection. A section of the log book shall contain a list, summary description or diagram(s) showing the location of all equipment in gasoline service at the facility. **(40 CFR 63.424(b))**

7. Each detection of a liquid or vapor leak shall be recorded in the log book. **(40 CFR 63.424(c))**

8. Permittee shall keep an up-to-date and readily accessible record of the continuous monitoring data. This record shall indicate the time intervals during which loading of gasoline cargo tanks have occurred or, alternatively, shall record the operating parameter data during such loadings. The date and time of day shall also be indicated at reasonable intervals on this record. **(40 CFR 63.428(c)(1))**

9. Permittee shall record all data and calculations, engineering assessments, and manufacturer's recommendations used in determining the operating parameter value under 40 CFR 63.425(b). **(40 CFR 63.428(c)(2)(i))**

10. Permittee shall record the following information in the log book for each leak that is detected each calendar month. Compliance with these requirements shall be considered compliance with the requirements of 40 CFR 60.502(j) which have been subsumed under this streamlined requirement: **((40 CFR 63.428(e))**
    a) The equipment type and identification number
    b) The nature of leak (i.e. vapor or liquid)
    c) Method of detection (i.e. sight, sound or smell)
    d) The date the leak was detected and the date of 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 if the leak is not repaired within 15 days
    g) The date of successful repair of the leak

11. Permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system. **(40 CFR 60.505(f))**

Appendix 5-S2. Testing Procedures

The permittee shall use the following approved test plans, procedures, and averaging to measure the pollutant emissions for the applicable requirements referenced in EULOADINGRACKS-S2.

1. The owner of the delivery vessel shall test the delivery vessel in accordance with EPA Reference Test Method 27 within one year of the date of the previous test. Compliance with this requirement shall be considered compliance with the requirements of R336.2005 (R336.2005 is required by R336.1627(3)) which has been subsumed under this streamlined requirement 40 CFR 63.425(e)(1). **(40 CFR 63.425(e)(1))**

2. The owner of the vapor collection system may be required to test the system in accordance with 40 CFR 63.425(a)(1), upon notification from the District Supervisor Air Quality Division. If a test is required, stack testing procedures and the location of stack testing ports must have prior approval by the Air Quality Division, and the results shall be submitted within 60 days following the last day of the test. **(R 336.1627(10))**

3. Permittee shall notify the Division about the exact time and location of the test, in writing, not less than 7 days before the actual test. **(R 336.1627(10))**

4. Permittee shall submit the 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 tests shall be submitted to the Division within 60 days following the last date of the test. **(R 336.1627(10))**

Appendix 8-S2. 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

The permittee shall use the following approved formats and procedures for the reporting requirements referenced in EULOADINGRACKS-S2. Alternative formats must be approved by the AQD District Supervisor.

1. Applicant shall report simultaneously all data and calculations, engineering assessments, and manufacturer's recommendations used in determining the operating parameter value required under 40 CFR 63.425 (b). **(40 CFR 63.428(c)(2)(i))**

2. Applicant shall report to the EPA administrator a description of the types, identification numbers and locations of equipment in gasoline service. **(40 CFR 63.428(f))**

3. Applicant shall include in a semi-annual report to the EPA administrator the following information: (40 CFR 63.428(g))
   a) Each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility. **(40 CFR 63.428(g)(1))**
   b) Number of gasoline equipment leaks for which a first attempt at repair was not made within 5 days after detection. **(40 CFR 63.428(g)(3))**

4. Applicant shall include in the excess emissions report to the EPA administrator required under 40 CFR 63.10(e)(3) the following information: **(40 CFR 63.428(h))**
   a) Each exceedance or failure to maintain, as appropriate, the monitored operating parameter value determined under 40 CFR 63.425(b). The report shall include the monitoring data for the days on which exceedances or failures to maintain have occurred and a description and timing of the steps taken to repair or perform maintenance on the vapor collection systems and vapor processing systems or the CMS. **(40 CFR 63.428(h)(1))**
   b) Each instance of a non vapor-tight gasoline cargo tank loading at the facility in which the applicant failed to take steps to assure that such cargo tank would not be reloaded at the facility before vapor tightness documentation for that cargo tank was obtained. **(40 CFR 63.428(h)(2))**
   c) Each reloading of a non vapor-tight gasoline cargo tank at the facility before vapor tightness documentation for that cargo tank is obtained by the facility in accordance with 40 CFR 63.422(c)(2). **(40 CFR 63.428(h)(3))**
   d) 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 63.428(h)(4))**
      i. The date on which the leak was detected **(40 CFR 63.428(h)(4)(i))**
      ii. The date of each attempt to repair the leak **(40 CFR 63.428(h)(4)(ii))**
      iii. The reasons for the delay **(40 CFR 63.428(h)(4)(iii))**
      iv. The date of successful repair **(40 CFR 63.428(h)(4)(iv))**