

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

December 13, 2021

**PERMIT TO INSTALL**  
1140-92E

**ISSUED TO**  
US Energy Distribution, LLC

**LOCATED AT**  
40600 Grand River Avenue  
Novi, Michigan 48375

**IN THE COUNTY OF**  
Oakland

**STATE REGISTRATION NUMBER**  
B2881

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: <b>October 19, 2021</b>	
DATE PERMIT TO INSTALL APPROVED: <b>December 13, 2021</b>	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

**PERMIT TO INSTALL**

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## COMMON ACRONYMS

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

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

### POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO <sub>2</sub> e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H <sub>2</sub> S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO <sub>x</sub>	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter equal to or less than 10 microns in diameter
PM <sub>2.5</sub>	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 <sub>2</sub>	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.

<b>Emission Unit ID</b>	<b>Emission Unit Description (Including Process Equipment &amp; Control Device(s))</b>	<b>Flexible Group ID</b>
EULOADRACK	All petroleum product loading racks at the facility	NA
EUTANK101	995,694-gallon Internal Floating Roof Ethanol Storage Tank 101	NA
EUTANK102	1,684,326-gallon Fixed Roof Fuel Storage Tank 102	NA
EUTANK103	Fixed Roof Distillate Fuel Storage Tank 103	NA
EUTANK104	27,571,232-gallon Internal Floating Roof Gasoline Storage Tank 104	FGGASOLINETANKS
EUTANK105	2,756,922-gallon Internal Floating Roof Gasoline Storage Tank 105	FGGASOLINETANKS
EUTANK106	2,231,796-gallon Internal Floating Roof Gasoline Storage Tank 106	FGGASOLINETANKS
EUTANK107	1,561,560-gallon Fixed Roof Storage Tank 107	NA

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

**EULOADRACK  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

All petroleum product loading racks at the facility

**Flexible Group ID:** NA

**POLLUTION CONTROL EQUIPMENT**

A vapor recovery unit (VRU) operates as the primary pollution control equipment (PCE) for the loading rack. A vapor destruction unit (VDU) is utilized as the secondary PCE when the VRU is not operating due to, but not limited to, maintenance, testing, emergencies, etc.

**I. EMISSION LIMIT(S)**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring / Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. VOC	17.4 tpy	12-month rolling time period as determined at the end of each calendar month.	EULOADRACK	SC VI.2	R 336.1205(1)(a) & (3), R 336.1225
2. VOC	10mg/L of organic compounds loaded	Hourly	EULOADRACK via the vapor recovery unit and the vapor destruction unit	SC V.1	R 336.1225, R 336.1702(a), 40 CFR Part 60 Subpart XX

**II. MATERIAL LIMIT(S)**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring / Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. Gasoline	250 million gallons per year	12-month rolling time period as determined at the end of each calendar month.	EULOADRACK	SC VI.3	R 336.1205(1)(a) &(3), R 336.1225, R 336.1702(a)
2. Diesel	100 million gallons per year	12-month rolling time period as determined at the end of each calendar month.	EULOADRACK	SC VI.3	R 336.1205(1)(a) &(3), R 336.1225, R 336.1702(a)
3. Ethanol	80 million gallons per year	12-month rolling time period as determined at the end of each calendar month.	EULOADRACK	SC VI.3	R 336.1205(1)(a) &(3), R 336.1225, R 336.1702(a)
4. Jet A Fuel	50 million gallons per year	12-month rolling time period as determined at the end of each calendar month.	EULOADRACK	SC VI.3	R 336.1205(1)(a) &(3), R 336.1225, R 336.1702(a)

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall not load any delivery vessel with an organic compound having a true vapor pressure greater than 1.5 psia or any delivery vessel that carried, as its previous load, an organic compound having a true vapor pressure greater than 1.5 psia unless all provisions of Rule 706 are met. The provisions of Rule 706 include, but are not limited to, filling the delivery vessel by a submerged fill pipe, and the following:  
**(R 336.1706, R 336.1702)**
  - a) The delivery vessel shall be controlled by a vapor recovery system that captures all displaced organic vapor and air by means of a vapor-tight collection line. **(R 336.1706(2))**
  - b) The delivery vessel shall be equipped maintained, or controlled with all of the following: **(R 336.1706(3))**
    - i) An interlocking system or procedure to ensure that the vapor-tight collection line is connected before any organic compound can be loaded.
    - ii) A device to ensure that the vapor-tight collection line shall close upon disconnection so as to prevent the release of organic vapor.
    - iii) A device to accomplish complete drainage before the loading device is disconnected, or a device to prevent liquid drainage from the loading device when not in use.
    - iv) Pressure-vacuum relief valves that are vapor-tight and set to prevent the emission of displaced organic vapor during the loading of the delivery vessel, except under emergency conditions.
    - v) Hatch openings that are kept closed and vapor-tight during the loading of the delivery vessel.
  - c) The permittee shall develop written procedures for the operation of all control measures required by Rule 706 and shall post the procedures in an accessible, conspicuous location near the loading device. **(R 336.1706(4))**
  
2. The permittee shall not load any delivery vessel subject to control, as specified in SC III.1, unless all provisions of Rule 627 are met. The provisions of Rule 627 include, but are not limited to, the following:  
**(R 336.1205(1)(a) & (3), R 336.1225, R 336.1627, R 336.1702(a), R 336.1910)**
  - a) There shall be no gas detector reading greater than or equal to 100 percent of the lower explosive limit at a distance of 1 inch from the location of the potential leak in the vapor collection system. Leaks shall be detected by a combustible gas detector using the test procedure described in Rule 2005.
  - b) There shall be no visible leaks, except from the disconnection of bottom loading dry breaks and from raising top loading vapor heads, where a few drops are permitted.
  - c) The vapor collection system shall be designed and operated to prevent gauge pressure in the delivery vessel from exceeding 0.6 pounds per square inch and to prevent vacuum from exceeding -0.2 pounds per square inch gauge.
  - d) Any delivery vessel or component of a vapor collection system that fails to meet any provision of this rule shall not be operated until the necessary repairs have been made, the vessel or collection system has been retested, and the test results have been submitted to the department.
  
3. The permittee shall comply with all provisions of the Federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and Subpart XX, as they apply to EULOADRACK. The provisions of 40 CFR Part 60 Subpart XX include, but are not limited to, the following:  
**(40 CFR Part 60 Subparts A & XX)**
  - a) EULOADRACK shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading. **(40 CFR 60.502(a))**
  - b) Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack. **(40 CFR 60.502(d))**
  - c) Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the procedures found in 40 CFR 60.502(e). **(40 CFR 60.502(e))**
  - d) The permittee shall only load gasoline tank trucks equipped with vapor collection equipment that is compatible with the permittee's vapor collection system. **(40 CFR 60.502(f))**
  - e) The permittee shall assure that the vapor collection system is connected during each loading of a gasoline tank truck, including training drivers in the hookup procedures and posting visible reminder signs. **(40 CFR 60.502(g))**
  - f) The permittee shall design and operate the vapor collection and liquid loading equipment to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in 40 CFR 60.503(d). **(40 CFR 60.502(h))**
  - g) No pressure-vacuum vent in the vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water). **(40 CFR 60.502(i))**

4. No later than 60 days after issuance of this permit, the permittee shall submit to the AQD District Supervisor, for review and approval, an updated preventative maintenance/malfunction abatement plan (PM/MAP) for EULOADRACK. After approval of the PM/MAP by the AQD District Supervisor, the permittee shall not operate EULOADRACK unless the PM/MAP, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. At a minimum Rule 911 requires the plan to include:
- a) Identification of the equipment and all control equipment and the supervisory personnel responsible for overseeing the inspection, maintenance, and repair.
  - b) Description of the items or conditions to be inspected and frequency of the inspections or repairs.
  - c) Description of equipment and each add-on air pollution control device operating parameters that shall be monitored to detect a malfunction or failure, the normal operating range of the equipment and a description of the method of monitoring or surveillance procedures.
  - d) Identification of the major replacement parts that shall be maintained in inventory for quick replacement.
  - e) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If the PM/MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the PM/MAP within 45 days after such an event occurs and submit the revised plan for approval to the AQD District Supervisor. Should the AQD determine the PM/MAP to be inadequate, the AQD District Supervisor may request modification of the plan to address those inadequacies. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1910, R 336.1911)**

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall not load any product into any truck in EULOADRACK with organic compounds having a true vapor pressure of more than 1.5 psia unless the VRU or VDU is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining and operating each control device in accordance with the malfunction abatement plan. **(R 336.1225, R 336.1702(a), R 336.1910)**

#### **V. TESTING/SAMPLING**

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

1. Within 60 days after achieving the maximum production rate, but not later than 180 days after commencement of initial startup or upon request from the AQD District Supervisor, the permittee shall verify VOC emission rates from the VRU controlling EULOADRACK, as required by federal Standards of Performance for New Stationary Sources, by testing at owner's expense, in accordance with 40 CFR Part 60 Subparts A and XX. The permittee shall notify the AQD District Supervisor in writing within 15 days of the date of commencement of initial startup of VRU in accordance with 40 CFR 60.7(a)(3)., in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

<b>Pollutant</b>	<b>Test Method Reference</b>
VOCs	40 CFR Part 60, Appendix A

No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.2001, R 336.2003, R 336.2004, 40 CFR Part 60 Subparts A & XX)**

2. The department may require the owner or operator of any vapor collection system subject to the provisions of subrule (6) of Rule 627 to test the system in accordance with Rule 2005. The tests shall be conducted within 60 days following receipt of written notification from the department. Notification of the exact time and location of the test shall be given to the department, in writing, not less than seven days before the actual test. Documentation of the test that states the date and location of the test, test procedures, the type of equipment used, and the results of the test shall be submitted to the department within 60 days following the last date of the test. If the time or location of the test changes for any reason, then the owner or operator shall notify the department as soon as practical. **(R 336.1627(10), R 336.2001, R 336.2003, R 336.2004)**

## **VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702(a))**
2. The permittee shall calculate the VOC emission rate from EULOADRACK monthly, for the preceding 12-month rolling time period, using a method acceptable to the AQD District Supervisor. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205(1)(a) & (3), R 336.1702)**
3. The permittee shall keep records of the EULOADRACK gasoline, diesel, ethanol, and jet A fuel throughput for each calendar month and 12-month rolling time period. The permittee shall keep these records on file at the facility and make them available to the Department upon request. **(R 336.1205(1)(a) & (3), R 336.1225)**
4. The permittee shall perform inspections and monitor emissions and operating information in accordance with the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and XX. The provisions of 40 CFR Part 60 Subpart XX include, but are not limited to, the following: **(R 336.1225, R 336.1702(a), 40 CFR Part 60 Subparts A & XX)**
  - a) 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 total organic compounds liquid or vapor leaks. Detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded, and the source of the leak repaired within 15 calendar days after it is detected. **(40 CFR 60.502(j))**
5. The permittee shall keep, on a monthly basis, separate records of the hours of product loading when VRU is the primary control device and when VDU is the primary control device. The permittee shall keep these records on file at the facility and make them available to the Department upon request. **(R 336.1225, R 336.1702(a), R 336.1910)**
6. The permittee shall keep records of the following:
  - a) Compliance with the appropriate leak test for each delivery vessel loaded.
  - b) Part replacements, repairs and maintenance for the loading rack control devices as specified in the (PM/MAP).
  - c) All VRU and VDU malfunctions or failures.
  - d) All VRU and VDU performance and emission test results.

The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1225, R 336.1627, R 336.1702(a), R 336.1910)**

7. The permittee shall keep records of emissions and operating information to comply with the federal Standards of Performance for New Stationary sources as specified in 40 CFR Part 60 Subparts A and XX. The permittee shall keep all source emissions data and operating information on file for a period of at least five years and make them available to the Department upon request. The provisions of 40 CFR Part 60 Subpart XX include, but are not limited to, the following: **(40 CFR Part 60 Subparts A & XX)**
  - a) The tank truck vapor tightness documentation required under 40 CFR 60.502(e)(1) shall be kept on file at the terminal in a permanent form available for inspection. **(40 CFR 60.505(a))**

- b) The documentation file for each gasoline tank truck shall be updated at least once per year, within 12-months of the previous test, to reflect current test results as determined by Method 27. This documentation shall include, as a minimum, the following information: **(40 CFR 60.505(b))**
  - i) Test title: Gasoline Delivery Tank Pressure Test—EPA Reference Method 27.
  - ii) Tank owner and address.
  - iii) Tank identification number.
  - iv) Testing location.
  - v) Date of test.
  - vi) Tester name and signature.
  - vii) Witnessing inspector, if any: Name, signature, and affiliation.
  - viii) Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs).
- c) A record of each monthly leak inspection required under 40 CFR 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: **(40 CFR 60.505(c))**
  - i) Date of inspection.
  - ii) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).
  - iii) Leak determination method.
  - iv) Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).
  - v) Inspector name and signature.
- d) The terminal owner or operator shall keep documentation of all notifications required under 40 CFR 60.502(e)(4) on file at the terminal for at least five years. **(40 CFR 60.505(d))**
- e) As an alternative to keeping records at the terminal of each gasoline cargo tank test result as required in 40 CFR 60.505(a), (c), and (d), the permittee may comply with the requirements in either 40 CFR 60.505(e)(1) or (2). **(40 CFR 60.505(e))**
  - i) An electronic copy of each record is instantly available at the terminal. The copy of each record is an exact duplicate image of the original paper record with certifying signatures. The permitting authority is notified in writing that each terminal using this alternative is in compliance with paragraph 40 CFR 60.505(e)(1). **(40 CFR 60.505(e)(1))**
  - ii) For facilities that utilize a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection by permitting authority representatives during the course of a site visit, or within a mutually agreeable time frame. The copy of each record is an exact duplicate image of the original paper record with certifying signatures. The permitting authority is notified in writing that each terminal using this alternative is in compliance with paragraph 40 CFR 60.505(e)(2). **(40 CFR 60.505(e)(2))**
- f) The permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least three years. **(40 CFR 60.505(f))**

## **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 commencement of trial operation of EULOADRACK. **(R 336.1201(7)(a))** 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 permittee shall submit the notification 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. **(R 336.1225(4))**

## **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:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter / Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SVVDU	96	40	R 336.1225
2. SVVRU	4	24	R 336.1225

**IX. OTHER REQUIREMENT(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. **(40 CFR Part 60 Subparts A & XX)**
2. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63 Subparts A and BBBBBB, as they apply to EULOADRACK. **(40 CFR Part 63 Subparts A & BBBBBB)**

**Footnotes:**

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

### FLEXIBLE GROUP SPECIAL CONDITIONS

### FLEXIBLE GROUP SUMMARY TABLE

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

<b>Flexible Group ID</b>	<b>Flexible Group Description</b>	<b>Associated Emission Unit IDs</b>
FGGASOLINETANKS	Three gasoline tanks	EUTANK104, EUTANK105, EUTANK106

<b>FGGASOLINETANKS FLEXIBLE GROUP CONDITIONS</b>
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**DESCRIPTION**

Three gasoline tanks

**Emission Unit:** EUTANK104, EUTANK105, EUTANK106

**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 gasoline in FGGASOLINETANKS unless the internal floating roofs are installed, maintained, and operated in a satisfactory manner. **(R 336.1604)**

**V. TESTING/SAMPLING**

NA

**VI. MONITORING/RECORDKEEPING**

NA

**VII. REPORTING**

NA

**VIII. STACK/VENT RESTRICTION(S)**

NA

**IX. OTHER REQUIREMENT(S)**

NA