

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

October 12, 2017

PERMIT TO INSTALL
395-97F

ISSUED TO
The Holland Terminal Company

LOCATED AT
630 Ottawa Avenue
Holland, Michigan

IN THE COUNTY OF
Ottawa

STATE REGISTRATION NUMBER
N1290

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

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: August 7, 2017	
DATE PERMIT TO INSTALL APPROVED: October 12, 2017	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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Common Abbreviations / Acronyms

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

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

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to R 336.1219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

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

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

13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. **(R 336.2001)**

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Flexible Group ID
EUTANK1	Storage Tank 25435 – 4,060,500 gallon fixed roof tank	FGPETROLEUMTANKS
EUTANK2	Storage Tank 21356 – 1,381,800 gallon fixed roof tank	FGPETROLEUMTANKS
EUTANK3	Storage Tank 21376 – 2,478,000 gallon vapor lifted roof	FGPETROLEUMTANKS
EUTANK4	Storage Tank 21375 – 2,478,000 gallon fixed roof tank	FGPETROLEUMTANKS
EUTANK5	Storage Tank 21361 – 338,300 gallon fixed roof tank	FGPETROLEUMTANKS
EUTANK6	Storage Tank 21362 – 338,300 gallon fixed roof tank	FGPETROLEUMTANKS
EUTANK7	Fuel oil storage tank – 60,000 barrel fixed roof tank	FGPETROLEUMTANKS
EUVERTAST1	Vertical above ground storage tank #1 – 12,000 gallon tank storing ethanol, kerosene or fuel oil	NA
EUVERTAST2	Vertical above ground storage tank #2 – 12,000 gallon tank storing ethanol, kerosene or fuel oil	NA
EUHORIZAST1	New horizontal above ground storage tank #1 – 13,800 gallon tank for emergency breakouts (installed in 2017)	NA
EUHORIZAST2	Horizontal above ground storage tank #2 – 15,000 gallon tank storing fuel additives	NA
EUETHANOLTANK1	Horizontal above ground storage tank – 30,000 gallon tank storing ethanol	NA
EUETHANOLTANK2	Horizontal above ground storage tank – 30,000 gallon tank storing ethanol	NA
EULOADRACK	Loading rack controlled by vapor balance and/or vapor recovery unit. Loading of tank trucks accomplished by pumps with a maximum rate of 650gpm each	NA

The following conditions apply to: EULOADRACK

DESCRIPTION: Loading rack controlled by vapor balance and/or vapor recovery unit. Loading of tank trucks accomplished by pumps with a maximum rate of 650gpm each

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Vapor balance and/or vapor recovery unit.

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not load any delivery vessel with gasoline unless all provisions of Rule 609 and Rule 604 are met, which means that organic vapors must be controlled to at least 90 percent by weight per Rule 604(1)(c). **(R 336.1609, R 336.1604)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall equip and maintain the EUTANK3 lifter roof with instrumentation to automatically start the vapor recovery unit if the lifter roof height on EUTANK3 reaches two-thirds (2/3) of the travel height. **(R 336.1604(1)(c))**
2. The permittee shall install, maintain and operate in a satisfactory manner, a vapor tight collection line which delivers the organic vapor to a loading rack control device when loading any delivery vessel with an organic compound having a true vapor pressure greater than 1.5 psia. **(R 336.1609)**
3. The permittee shall not load petroleum products with a vapor pressure greater than 1.5 psia unless the control system is installed, maintained, and operated in a satisfactory manner. The control system consists of vapor balance to storage tanks, a lifter roof on Tank 3, and carbon adsorption control of VOC emissions when the lifter roof reaches or exceeds 2/3 of lifter roof height. Satisfactory operation of the control system includes recovery of not less than 90 percent by weight of organic vapors that would otherwise be emitted into the atmosphere. **(R 336.1910)**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall implement and maintain an approved Malfunction Abatement Plan (MAP). The MAP shall include the following:
 - a) Recordkeeping provisions for part replacements, repairs and maintenance with respect to the loading rack control system.
 - b) Procedures for maintaining and operating the loading rack control system, in a satisfactory manner during malfunction events.
 - c) A program for corrective action for all malfunction events.

If the 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 MAP within 45 days after such an event occurs. **(R 336.1910, R 336.1911, R 336.1912)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

The following conditions apply to: EUHORIZAST1

DESCRIPTION: New horizontal above ground storage tank #1 – 13,800 gallon tank for emergency breakouts (installed in 2017)

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate EUHORIZAST1 unless a malfunction abatement plan (MAP) as described in Rule 911(2), for EUHORIZAST1, has been submitted within 180 days of completion of construction of EUHORIZAST1, and 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 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 336.1225, R 336.1910, R 336.1911)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall equip and maintain EUHORIZAST1 with a conservation vent or vents to minimize breathing losses.¹ **(R 336.1225)**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep, in a satisfactory manner, monthly records of throughput through EUHORIZAST1. The permittee shall keep all records on file at the facility and make them available to the AQD District Supervisor upon request.¹ **(R 336.1225)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

Footnotes:

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGPETROLEUMTANKS	Fixed roof tanks for storing organic compounds.	EUTANK1, EUTANK2, EUTANK3, EUTANK4, EUTANK5, EUTANK6, EUTANK7

The following conditions apply to: FGPETROLEUMTANKS

DESCRIPTION: Fixed roof tanks for storing organic compounds.

Emission Units: EUTANK1, EUTANK2, EUTANK3, EUTANK4, EUTANK5, EUTANK6, EUTANK7

POLLUTION CONTROL EQUIPMENT: Vapor balance and/or vapor recovery unit for those tanks in gasoline service.

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not store organic compounds having a true vapor pressure of more than 1.5 psia unless all provisions of Rule 604 are met. **(R 336.1604)**
2. The permittee shall not store any product in EUTANK7 other than fuel oil. **(R 336.1224, R 336.1225, R 336.1702)**

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

NA

VII. REPORTING

1. Within 30 days after completion of the installation of EU-TANK7, 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 is considered to occur not later than commencement of trial operation of EU-TANK7. **(R 336.1201(7)(a))**

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA