

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

April 15, 2019

**PERMIT TO INSTALL**  
178-98C

**ISSUED TO**  
Sunoco Pipeline LP

**LOCATED AT**  
250 Murphy Road  
Marysville, Michigan

**IN THE COUNTY OF**  
Saint Clair

**STATE REGISTRATION NUMBER**  
B6646

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: <b>February 28, 2019</b>	
DATE PERMIT TO INSTALL APPROVED: <b>April 15, 2019</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	Michigan Department of Environmental Quality
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
MDEQ	Michigan Department of Environmental Quality
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
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 <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 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 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 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 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>Installation Date / Modification Date</b>	<b>Flexible Group ID</b>
EUTANK34	Internal floating roof storage tank.		FGTANKFARM
EUTANK36	Internal floating roof storage tank.		FGTANKFARM
EUTANK41	Internal floating roof storage tank.		FGTANKFARM
EUTANK43	Internal floating roof storage tank.		FGTANKFARM
EUTANK44	Internal floating roof storage tank.		FGTANKFARM
EUTANK45	Internal floating roof storage tank.		FGTANKFARM
EUTANK46	Internal floating roof storage tank.		FGTANKFARM
EULACTUNIT	Crude oil truck unloading facility consisting of the attached transport truck, the liquid automatic custody transfer (LACT) unit, sump pump, hose, t-rack, and piping.		

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.

## **EULACTUNIT EMISSION UNIT CONDITIONS**

### **DESCRIPTION**

Crude oil truck unloading facility consisting of the attached transport truck, the liquid automatic custody transfer (LACT) unit, sump pump, hose, t-rack, and piping.

**Flexible Group ID:** NA

### **POLLUTION CONTROL EQUIPMENT**

NA

#### **I. EMISSION LIMIT(S)**

1. There shall be no visible emissions from EULACTUNIT. **(R 336.1301)**

#### **II. MATERIAL LIMIT(S)**

1. The permittee shall only unload crude oil through EULACTUNIT that is "sweet crude" as defined in Rule 119(bb) (R 336.119(bb)). **(R 336.1403, R 336.1901)**

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

1. The permittee shall allow unloading only by trucks that are inspected, pressure tested, and leak tested annually as required by 40 CFR 180.407.<sup>1</sup> **(R 336.1910)**
2. The permittee shall not unload crude oil at EULACTUNIT prior to 6:00 AM or after 6:00 PM. In addition, the permittee shall not unload crude oil at EULACTUNIT after 11:00 AM on Sundays and holidays.<sup>1</sup> **(R 336.1901)**

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

NA

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

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

1. The permittee shall, for each lease site providing crude oil to EULACTUNIT, perform a one-time demonstration that the crude oil from the lease site is "sweet crude" as defined in Rule 119(bb). The permittee shall conduct this demonstration using methods acceptable to the AQD District Supervisor. The demonstration may include use of data previously collected by the permittee, the MDEQ, the lease owner, or another party, provided the data is acceptable to the AQD District Supervisor, or new data collected by the permittee or another party, provided the data is acceptable to the AQD District Supervisor. **(R 336.1403, R 336.1901)**

#### **VI. MONITORING/RECORDKEEPING**

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

1. Within 90 days of the date of this permit for routinely producing wells which produce and are hauled monthly, or before bringing crude oil to the facility for non-routinely producing wells which are hauled less frequently, the permittee shall keep, for each lease site providing crude oil to EULACTUNIT, a record demonstrating that the crude oil from the lease site is "sweet crude" as defined in Rule 119(bb). **(R 336.1403, R 336.1901)**
2. The permittee shall keep all records of truck inspections, testing, and cleaning on file and make them available to the Department upon request.<sup>1</sup> **(R 336.1901)**

3. The permittee shall maintain a log of daily sweet crude oil deliveries to EULACTUNIT, including source of the oil, time of delivery, and duration of delivery. The permittee shall keep all records of crude oil deliveries on file and make them available to the Department upon request.<sup>1</sup> **(R 336.1901)**

**VII. REPORTING**

NA

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

NA

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall clearly post the truck driver's check list, attached as Appendix A, at the facility, and take the necessary steps to ensure that the truck driver follows these procedures.<sup>1</sup> **(R 336.1901)**

**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>
FGTANKFARM	Internal floating roof storage tanks.	EUTANK34, EUTANK36, EUTANK41, EUTANK43, EUTANK44, EUTANK45, EUTANK46

**FGTANKFARM  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Internal floating roof storage tanks.

**Emission Unit:** EUTANK34, EUTANK36, EUTANK41, EUTANK43, EUTANK44, EUTANK45, EUTANK46

**POLLUTION CONTROL EQUIPMENT**

Internal floating roofs

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

1. The throughput for FGTANKFARM shall not exceed the following: **(R 336.1205(3))**
  - a. 194,565,000 barrels of crude oil per 12-month rolling time period as determined at the end of each calendar month.

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

1. The permittee shall comply with all provisions of the Federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and Kb, as they apply to EUTANK44, EUTANK45, and EUTANK46. **(R 336.1702(b), 40 CFR Part 60 Subparts A and Kb)**
2. The permittee shall not operate EUTANK34, EUTANK36, EUTANK41 and EUTANK43 unless all provisions of Rule 604 are met. The provisions of Rule 604 include, but are not limited to, the following: **(R 336.1205(3), R 336.1604)**
  - a. The vessel is 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 vessel wall. The seal or any seal fabric shall not have visible holes, tears, or other nonfunctional openings. **(R 336.1604(1)(b))**
  - b. All opening, except stub drains, in any stationary vessel subject to the provisions of this rule shall be equipped with covers, lids, or seals so that all of the following conditions are met: **(R 336.1604(2))**
    - 1) The cover, lid, or seal is in the closed position at all times, except when in actual use.
    - 2) Automatic bleeder vents are closed at all times, except when the roof is floated off, or landed on, the roof leg supports.
    - 3) 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.

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

1. The permittee shall equip and maintain the storage tanks with the deck and seal configuration listed in the following table:

	<b>Equipment</b>	<b>Type</b>	<b>Deck</b>	<b>Primary Seal</b>	<b>Secondary Seal</b>	<b>Applicable Requirement</b>
a.	EUTANK34	Internal floating roof	Welded	Mechanical Shoe	Rim-mounted	R 336.1205(3) R 336.1604
b.	EUTANK36	Internal floating roof	Welded	Vapor Mounted	Rim-mounted	R 336.1205(3) R 336.1604

	<b>Equipment</b>	<b>Type</b>	<b>Deck</b>	<b>Primary Seal</b>	<b>Secondary Seal</b>	<b>Applicable Requirement</b>
c.	EUTANK41	Internal floating roof	Welded	Mechanical Shoe	Rim-mounted	R 336.1205(3) R 336.1604
d.	EUTANK43	Internal floating roof	Welded	Mechanical Shoe	Rim-mounted	R 336.1205(3) R 336.1604
e.	EUTANK44	Internal floating roof	Welded	Vapor Mounted	Rim-mounted	R 336.1205(3) R 336.1702(b) 40 CFR Part 60 Subpart Kb
f.	EUTANK45	Internal floating roof	Welded	Mechanical Shoe	Rim-mounted	R 336.1205(3) R 336.1702(b) 40 CFR Part 60 Subpart Kb
g.	EUTANK46	Internal floating roof	Welded	Mechanical Shoe	Rim-mounted	R 336.1205(3) R 336.1702(b) 40 CFR Part 60 Subpart Kb

**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 perform inspections and monitor operating information for EUTANK44, EUTANK45, and EUTANK46 in accordance with the federal Standards of Performance for New Stationary sources as specified in 40 CFR Part 60 Subparts A and Kb. **(R 336.1702(b), 40 CFR Part 60 Subparts A & Kb)**
2. All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **(R 336.1205(3))**
3. The permittee shall keep records of the throughput for each tank in FGTANKFARM for each calendar month and 12-month rolling time period as determined at the end of each calendar month. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(3))**
4. The permittee shall keep records of inspections and operating information for EUTANK44, EUTANK45, and EUTANK46 in accordance with the federal Standards of Performance for New Stationary sources as specified in 40 CFR Part 60 Subparts A and Kb. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1702(b), 40 CFR Part 60 Subparts A & Kb)**

**VII. REPORTING**

NA

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

NA

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

### FGFACILITY CONDITIONS

**DESCRIPTION:** The following conditions apply source-wide to all process equipment including equipment covered by other permits, grand-fathered equipment and exempt equipment.

#### POLLUTION CONTROL EQUIPMENT

Internal floating roofs

#### I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	Less than 90 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
2. Each individual HAP	Less than 9 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
3. Aggregate HAPs	Less than 22.5 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)

#### II. MATERIAL LIMIT(S)

NA

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

NA

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

NA

#### 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. All required semi-annual calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the last day of the calendar month following the end of the semi-annual time period, unless otherwise specified in any recordkeeping, reporting or notification special condition. (R 336.1205(3))
2. The permittee shall keep, in a satisfactory manner, records of semi-annual VOC, individual HAP and total HAP emission rate calculations for FGFACILITY, as required by SC I.1, SC I.2, and SC I.3. Semi-annual calculations shall cover the periods from January 1 through June 30, and from July 1 through December 31. Each semi-annual calculation shall include monthly calculations for each month in the semi-annual period. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(3))

**VII. REPORTING**

NA

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

NA

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

## APPENDIX A

### MARYSVILLE TRUCK UNLOADING STATION CHECK LIST

Visually inspect vehicle and unloading station to ensure both are in proper order to begin unloading procedures.

1. Set parking brakes and chock wheels.
2. Hook up ground cable to trailer.
3. Hook up unloading hose to trailer.
4. Place cap on hose connection post.
5. Open compartment gate valves.
6. Open rear compartment.
7. Open main gate valve to header.
8. Start pump at lact unit.
9. Allow 3-4 barrels oil to pump off.
10. Open fire valves.
11. While unloading, driver logs where load came from and time on Log sheet.
12. Driver watches gauges on trailer—when they reach 0, driver shuts of gate valve on trailer.
13. Starts uncoupling unloading hose from truck, allow pump to operate for a minimum of 10 seconds to enable hose to empty.
14. Shuts off pump.
15. Shuts fire valves (front and rear).
16. Shuts valve off in hose connection.
17. Finishes disconnecting hose and install on post.
18. Places cap on load line on trailer.
19. Closes compartment valves.
20. Finishes paperwork.