

Michigan Department of Environmental Quality  
Air Quality Division

State Registration Number

B2987

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number

MI-ROP-B2987-2016

**BUCKEYE TERMINALS, LLC – RIVER ROUGE TERMINAL**

SRN: B2987

Located at

205 Marion Ave, River Rouge, Michigan 48218

Permit Number: MI-ROP-B2987-2016

Staff Report Date: April 6, 2015

This Staff Report is published in accordance with Sections 5506 and 5511 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Specifically, Rule 214(1) requires that the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

## TABLE OF CONTENTS

<b>April 6, 2015 STAFF REPORT</b>	<b>3</b>
<b>December 23, 2015 STAFF REPORT ADDENDUM</b>	<b>8</b>

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**April 6, 2015 STAFF REPORT**

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**Purpose**

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with an ROP pursuant to Title V of the federal Clean Air Act of 1990 and Michigan's Administrative Rules for Air Pollution Control pursuant to Section 5506(1) of Act 451. Sources subject to the ROP program are defined by criteria in Rule 211(1). The ROP is intended to simplify and clarify a stationary source's applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This Staff Report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft ROP terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft ROP pursuant to Rule 212(5), and any determination made pursuant to Rule 213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

**General Information**

Stationary Source Mailing Address:	Buckeye Terminals, LLC-River Rouge Terminal 205 Marion Ave River Rouge, Michigan 48218
Source Registration Number (SRN):	B2987
North American Industry Classification System (NAICS) Code:	493190
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201300080
Responsible Official:	Brad Crawford, Operations Manager 810-789-9180
AQD Contact:	Terseer Hemben, Environmental Engineer 313-456-4677
Date Application Received:	May 13, 2013
Date Application Was Administratively Complete:	May 13, 2013
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	April 6, 2015
Deadline for Public Comment:	May 6, 2015

## Source Description

The Buckeye Terminals-River Rouge Terminal is a stationary bulk petroleum storage and transfer terminal located at 205 Marion Avenue, River Rouge, Michigan. The facility lies about one quarter mile to the east of West Jefferson Avenue in a primary industrial area. The nearest residences are approximately 225 yards to the northwest of the facility's truck loading rack. The facility receives a variety of petroleum products through pipelines and loads the products into tanks and trucks using loading racks. These products include gasoline, kerosene, light fuel oils, diesel fuel, and additives. The gasoline loading facility and some of the storage tanks require control equipment. Gasoline products are bottom loaded into trucks that are connected to the vapor recovery (VRU)/Vapor Combustion Unit (VCU) during loading.

The facility consists of various emission units. There is a seven-lane tank truck loading rack, EULOADRACK, equipped with a vapor recovery system or vapor combustion system for control of VOC emissions. There are 30 storage tanks, some of which are located on each side of Marion Avenue. EUTANK57 is a vertical tank with a fixed roof. Three tanks, EUTANK8, EUTANKK52 and EUTANK53, listed in the flexible group, FGFIXEDROOFTANKS, are less than 10,000 gallons each. Nine petroleum tanks are described under FGGASTANKS, EUTANK14, EUTANK15, EUTANK16, EUTANK17, EUTANK18, EUTANK20, EUTANK23, EUTANK24 and EUTANK25. The emission units in FGGASTANKS are controlled by internal floating roofs and external floating roofs equipped with weather covers. Two fixed roof tanks, EUTANK13 and EUTANK 21, are covered under FGDISTTANKS. FGGASNSPS consists of three tanks controlled by internal floating roofs, EUTANK12, EUTANK22 and EUTANK56. The facility operates FGAIRSTRIPPER, a groundwater remediation system consisting of two air strippers and a soil vapor extraction system with a catalytic oxidizer. FGRULE290 consists of a butane tank, EUBUTANE. In addition, FGMACT6B contains EULOADRACK and the following storage tanks, EUTANK12, EUTANK15, EUTANK16, EUTANK17, EUTANK18, EUTANK20, EUTANK22, EUTANK23 and EUTANK56.

Thirteen small tanks are exempt from NSR permit requirements under rule R336.1284(i). Three internal combustion engines are exempt from NSR permit requirements under rule R336.1285(g). Three furnaces are exempt from NSR permit requirements under the rule R336.1282(b)(ii).

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year 2013.

### **TOTAL STATIONARY SOURCE EMISSIONS**

<b>Pollutant</b>	<b>Tons per Year</b>
Volatile Organic Compounds (VOCs)	67.7

In addition to the pollutants listed above that have been reported in MAERS, the potential to emit of Greenhouse Gases (GHG) in tons per year of CO<sub>2</sub>e (carbon dioxide equivalents) is less than 100,000. CO<sub>2</sub>e is a calculation of the combined global warming potentials of six GHG (carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride).

See Parts C and D in the ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

## **Regulatory Analysis**

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are explained below in the Non-Applicable Requirement part of the Staff Report and identified in Part E of the ROP.

The stationary source is located in area which is currently designated by the U.S. Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants except for a portion of Wayne County designated as nonattainment for sulfur dioxide.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR), Part 70, because the potential to emit volatile organic compounds exceeds 100 tons per year. The stationary source is considered to be a minor source of HAP emissions because the potential to emit of any single HAP regulated by the federal Clean Air Act, Section 112, is less than 10 tons per year and the potential to emit of all HAPs combined are less than 25 tons per year.

No emissions units at the stationary source are currently subject to the Prevention of Significant Deterioration regulations of Part 18, Prevention of Significant Deterioration of Air Quality of Act 451, because at the time of New Source Review permitting the potential to emit of volatile organic compound was less than 250 tons per year.

At this time, there are no GHG applicable requirements to include in the ROP. The mandatory Greenhouse Gas Reporting Rule under 40 CFR Part 98 is not an ROP applicable requirement and is not included in the ROP.

The emission unit, EULOADRACK, was installed prior to August 15, 1967. As a result, this equipment is considered "grandfathered" and is not subject to New Source Review (NSR) permitting requirements. However, future modifications of this equipment may be subject to NSR. The EULOADRACK at the stationary source is subject to the Standards of Performance for Bulk Gasoline Terminals promulgated in 40 CFR, Part 60, Subparts A and XX.

Additionally, FGMACT6B at the stationary source is subject to the National Emission Standard for Hazardous Air Pollutants for Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline facilities promulgated in 40 CFR 63, Subpart A and BBBBBB.

Although the flexible group, FGFIXEDROOFTANKS, was installed after August 15, 1967, this equipment was exempt from New Source Review (NSR) permitting requirements at the time it was installed. However, future modifications of this equipment may be subject to NSR.

The emission units, EUTANK12, EUTANK22, and EUTANK56, at the stationary source are subject to the Standards of Performance for Volatile Organic Liquid Storage Vessels promulgated in 40 CFR 60, Subparts A and Kb.

The stationary source agreed to the condition that the permittee shall store organic materials that have a true vapor pressure of 0.5 psia or less, so the NSPS, 40 CFR 60, Subpart Kb does not apply to EUTANK57.

The emission limitation for volatile organic compound from EULOADRACK at the stationary source is exempt from the federal Compliance Assurance Monitoring (CAM) regulation under 40 CFR Part 64, because the emission limitation is addressed by the National Emission Standard for Hazardous Air Pollutants for Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline facilities promulgated in 40 CFR 63, Subpart A and BBBBBB. Therefore, EULOADRACK is exempt from CAM requirements for volatile organic compounds.

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the "Procedure for Evaluating Periodic Monitoring Submittals."

Please refer to Parts B, C and D in the draft ROP for detailed regulatory citations for the stationary source. Part A contains regulatory citations for general conditions.

**Source-wide Permit to Install (PTI)**

Rule 214a requires the issuance of a Source-wide PTI within the ROP for conditions established pursuant to Rule 201. All terms and conditions that were initially established in a PTI are identified with a footnote designation in the integrated ROP/PTI document.

The following table lists all individual PTIs or Wayne County Permits that were incorporated into previous ROPs. PTIs issued after the effective date of ROP No. MI-ROP-B2987-2008a are identified in Appendix 6 of the ROP.

Permit Number			
C-9027	246-96	115-00	115-00A

**Streamlined/Subsumed Requirements**

This ROP does not include any streamlined/subsumed requirements pursuant to Rules 213(2) and 213(6).

**Non-applicable Requirements**

Part E of the ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the ROP Application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the ROP pursuant to Rule 213(6)(a)(ii).

**Processes in Application Not Identified in Draft ROP**

The following table lists processes that were included in the ROP Application as exempt devices under Rule 212(4). These processes are not subject to any process-specific emission limits or standards in any applicable requirement.

Exempt Emission Unit ID	Description of Exempt Emission Unit	Rule 212(4) Exemption	Rule 201 Exemption
EUTANK7	6,000 Gallon additive tank	R336.212(4)(c)	R336.1284(i)
EUTANK54A	13,500 Gallon vertical fixed roof tank for wastewater storage	R336.212(4)(c)	R336.1284(i)
EUTANK54B	13,500 Gallon vertical fixed roof tank for wastewater storage	R336.212(4)(c)	R336.1284(i)
EUTANK54C	16,000 Gallon vertical fixed roof tank for waste water storage	R336.212(4)(c)	R336.1284(i)
EUTANK83	549 Gallon tote for additive storage	R336.212(4)(c)	R336.1284(i)
EUTANK83A	359 Gallon tote for additive storage	R336.212(4)(c)	R336.1284(i)
EUTANK89	345 Gallon tote for additive storage	R336.212(4)(c)	R336.1284(i)
EUTANK89A	549 Gallon tote for additive storage	R336.212(4)(c)	R336.1284(i)
EUTANK89B	500 Gallon horizontal additive tank	R336.212(4)(c)	R336.1284(i)
EUTANK90	550 Gallon horizontal additive tank	R336.212(4)(c)	R336.1284(i)

<b>Exempt Emission Unit ID</b>	<b>Description of Exempt Emission Unit</b>	<b>Rule 212(4) Exemption</b>	<b>Rule 201 Exemption</b>
EUTANK91	6,000 Gallon horizontal additive tank	R336.212(4)(c)	R336.1284(i)
EUTANK92	2500 Gallon horizontal additive tank	R336.212(4)(c)	R336.1284(i)
EUTANK93	2500 Gallon horizontal additive tank	R336.212(4)(c)	R336.1284(i)
EUICE1	4 - Horsepower gasoline IC engine	R336.212(4)(d)	R336.1285(g)
EUICE2	4 - Horsepower gasoline IC engine	R336.212(4)(d)	R336.1285(g)
EUICE3	15- Horsepower gasoline IC engine	R336.212(4)(d)	R336.1285(g)
EUFURNACE1	90,000 BTU/hr. natural gas furnace	R336.212(4)(b)	R336.1282(b)(ii)
EUFURNACE2	120,000 BTU/hr. natural gas furnace	R336.212(4)(b)	R336.1282(b)(ii)
EUFURNACE3	650,000 BTU/hr. natural gas furnace	R336.212(4)(b)	R336.1282(b)(ii)

**Draft ROP Terms/Conditions Not Agreed to by Applicant**

This draft ROP does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

**Compliance Status**

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

**Action taken by the MDEQ, AQD**

The AQD proposes to approve this ROP. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the USEPA is allowed up to 45 days to review the draft ROP and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for the AQD is Wilhemina McLemore, Detroit District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the ROP Application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.

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**RENEWABLE OPERATING PERMIT**

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B2987

**December 23, 2015 STAFF REPORT ADDENDUM**

MI-ROP-B2987-2016

**Purpose**

A Staff Report dated April 6, 2015, was developed in order to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by R 336.1214(1). The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in R 336.1214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

**General Information**

Responsible Official:	Brad Crawford, Operations Manager 810-789-9180
AQD Contact:	Terseer Hemben, Environmental Engineer 313-456-4677

**Summary of Pertinent Comments**

The Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD) received the following comments from the Environmental Protection Agency (EPA) during the public comment period from April 6, 2015 to May 6, 2015.

**EPA Comment 1:**

Source-wide special condition (SC) LX.1 [sic] cites 40 C.F.R. §63.420(c)(1), which exempts the facility from the requirements of 40 C.F.R. Part 63, Subpart R, with the exception of those requirements identified in 40 C.F.R. §63.420(c)(1). The Staff Report does not discuss the applicability of 40 C.F.R. Part 63, Subpart R. The Staff Report should be revised to include a discussion regarding the applicability of 40 C.F.R. Part 63, Subpart R.

**AQD Response 1:**

AQD is providing the discussion regarding the applicability of 40 CFR, Part 63, Subpart R as follows: Buckeye Terminals, LLC-River Rouge Terminal, hereinafter Buckeye River Rouge Terminal, has demonstrated that it is a minor source of hazardous air pollutants. 40 CFR §63.420 states that the affected source to which the provisions of this rule applies is each bulk gasoline terminal, except those terminals for which the owner or operator has documented and recorded that the emission screening factor ( $E_T$ ) in the following equation is less than 1 and complies with §63.420(c), (d), (e), and (f). Buckeye River Rouge Terminal is subject to 40 CFR §63.428(i)(3) which requires annual reports to document that the  $E_T$  value is less than 1.

$$E_T = CF [0.59(T_F)(1 - CE) + 0.17*(T_E) + 0.08*(T_{ES}) + 0.038(T_I) + 8.5 \times 10^{-6}(C) + KQ] + 0.04(OE)$$

Where:

$E_T$  = emissions screening factor for bulk gasoline terminals

CF = 0.161 for terminals that do not handle any reformulated or oxygenated gasoline containing 7.6 percent by volume or greater MTBE OR

CF = 1.0 for terminals that do handle reformulated or oxygenated gasoline containing 7.6 percent by volume or greater MTBE

CE = control efficiency limitation on potential to emit for the vapor processing system used to control emissions from fixed-roof gasoline storage vessels [value should be added in decimal from (percent divided by 100)];

T<sub>F</sub> = total number of fixed-roof gasoline storage vessels without an internal floating roof;

T<sub>E</sub> = total number of external floating roof gasoline storage vessels with only primary seals;

T<sub>ES</sub> = total number of external floating roof gasoline storage vessels with primary and secondary seals;

T<sub>I</sub> = total number of fixed-roof gasoline storage vessels with an internal floating roof;

C = number of valves, pumps, connectors, loading arm valves, and open-ended lines in gasoline service;

Q = gasoline throughput limitation on potential to emit or gasoline throughput limit in compliance with paragraphs (c), (d), and (f) of this section (liters/day);

K =  $4.52 \times 10^{-6}$  for bulk gasoline terminals with uncontrolled loading racks (no vapor collection and processing systems), OR

K =  $(4.5 \times 10^{-9}) (EF + L)$  for bulk gasoline terminals with controlled loading racks (loading racks that have vapor collection and processing systems installed on the emission stream);

EF = emission rate limitation on potential to emit for the gasoline cargo tank loading rack vapor processor outlet emissions (mg of total organic compounds per liter of gasoline loaded);

OE = other HAP emissions screening factor for bulk gasoline terminals or pipeline breakout stations (tons per year). OE equals the total HAP from other emission sources not specified in parameters in the equations for ET or EP. If the value of 0.04 (OE) is greater than 5 percent of either ET or EP, then paragraphs (a)(1) and (b)(1) of 63.420 shall not be used to determine applicability;

L = 13 mg/l for gasoline cargo tanks meeting the requirement to satisfy the test criteria for a vapor-tight gasoline tank truck in §60.501, OR

L = 304 mg/l for gasoline cargo tanks not meeting the requirement to satisfy the test criteria for a vapor-tight gasoline tank truck in §60.501.

Per AQD's request, Buckeye River Rouge Terminal submitted the most recent E<sub>T</sub> calculation and supporting documentation for calendar year 2014. The calculated emission screening factor for bulk terminals, E<sub>T</sub>, equals 0.364 which is less than 1.

In response to the comment from EPA and AQD's request for the most recent E<sub>T</sub> calculation, Buckeye River Rouge Terminal has requested that the requirement to submit a report annually be removed from the permit. The facility's E<sub>T</sub> is less than 0.5 and therefore they are subject to 40 CFR 63.420(d), not §63.420(c). 40 CFR 429(d)(2) requires the facility to comply with the provisions of §63.428(j), not §63.428(i), as is currently proposed in the Draft ROP. 40 CFR 63.428(j) does not require annual reporting. The AQD has updated the Proposed ROP to reflect these changes.

#### EPA Comment 2:

EUTANK57, SC VI.2, allows the permittee to record the type and temperature of the stored material in the tank and states that this is equivalent to measuring true vapor pressure. SC VI.2 does not specify the protocol used to calculate the true vapor pressure of the storage tank. Please clarify how the permittee will determine the true vapor pressure of materials stored in the tank. This protocol should be identified within the permit to ensure consistency when demonstrating compliance with the true vapor pressure limit.

#### AQD Response 2:

According to §60.111b(b) of NSPS, Subpart Kb, this subpart does not apply to storage vessels with a capacity greater than or equal to 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) or with a capacity greater than or equal to 75 m<sup>3</sup> but less than 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure less than 15.0 kPa. For EUTANK57, the maximum true vapor pressure is less than 3.5 kPa (0.51 psia).

§60.111b of NSPS, Subpart Kb defines "Maximum true vapor pressure" as, in part, "the equilibrium partial pressure exerted by the stored Volatile Organic Liquid (VOL) at the temperature equal to the highest calendar-month average of VOL storage temperature for VOL's stored above or below the ambient temperature or at the local maximum monthly average temperature, as reported by the National Weather Service for VOL's stored at ambient temperatures."

The types of material stored in EUTANK57 are jet kerosene or distillate fuel oil No. 2. These volatile organic liquids are stored at ambient temperatures. According to the procedure specified in §60.116b(e)(1) of Part 60, Subpart Kb, the vapor pressure shall be calculated using the local maximum monthly average temperature as reported by the National Weather Service. EPA's AP-42, Chapter 7.1, Storage of Organic Liquids, November 2006 edition, contains equations and methods for calculating the maximum true vapor pressure. For example, the maximum true vapor pressure may be determined by interpolating the data in Chapter 7.1, Table 7.1-2, based upon the maximum average liquid surface temperature. Please note that this table indicates that the maximum true vapor pressure at 100°F is well below 0.5 psia for the storage of jet kerosene (0.029 psia) or distillate fuel oil No. 2 (0.022 psia). Therefore, the maximum true vapor pressure for EUTANK57 at normal operating conditions will not exceed 0.5 psia.

However, to address this comment, the AQD has clarified in SC V1.2 the methodology for determining or calculating the true vapor pressure.

EPA Comment 3:

EULOADRACK, SC 111.4(b) [sic], requires the permittee to notify the owner or operator of non-vapor-tight gasoline tank trucks loaded at the facility within three weeks after the loading has occurred. SC 111.4(b) [sic] cites 40 C.F.R. §60.502(e)(4) as the applicable requirement. However, 40 C.F.R. §60.502(e)(4) requires the permittee to notify the owner or operator of non-vapor-tight gasoline tank trucks within one week of the documentation cross-check required in SC 111.4(c) [sic] and 40 C.F.R. §60.502(e)(3).

AQD Response 3:

The AQD has revised the language in SC III.4b as requested by EPA.

EPA Comment 4:

EULOADRACK, SC IV.3 cites 40 C.F.R. §60.502(h) as the underlying applicable requirement, which requires the gauge pressure of a delivery tank not to exceed 450 mm of water during loading when measured using the procedures specified in 40 C.F.R. §60.503(d). However, the procedures identified in 40 C.F.R. §60.503(d) are not cited or included in the permit. Please ensure that the procedure used to determine the gauge pressure of a delivery tank is identified in the permit.

AQD Response 4:

Per EPA's request, the AQD has revised SC IV.3 of EULOADRACK to include a reference to the procedure specified in 40 CFR §60.503(d).

Also, AQD received the following comment from the Buckeye River Rouge Terminal during the public comment period:

Comment from Buckeye River Rouge Terminal:

The "groundwater remediation system", which is used to treat storm water from the facility prior to discharge to the Rouge River (under NPEDES-National Pollution Discharge Elimination System) is the same system that has been running since obtaining MI-ROP-B2987-2008. Currently, Buckeye collects system influent and effluent water samples before and after the air stripper on monthly basis, per NPDES Permit No. MIG080778. Air stripper vapor samples are collected on a monthly basis, in order to perform air calculations on a monthly basis. Buckeye notes that the language above is identical to the language

in the MI-ROP-B2987-2008, SC VI.1 & SC VI.2 (ROP page 47), appears to be boilerplate, and is applicable to treatment systems that are being started up for the first time, rather than ones that have been continuously operated for many years. Since the groundwater treatment system has been operating continuously since 2008 under similar operating conditions, Buckeye requests that the requirement for collection of weekly samples be removed. Analytical data for the monthly sampling of treatment system is contained in Discharge Monitoring reports (DMRs) for NPDES Permit No. MIG080778 from 2008 through the current month.

#### AQD Response

AQD staff thoroughly reviewed the documents in the facility file pertaining to the averaging time for the emission limit and the monitoring requirement specified in SC VI.2 of FGAIRSTRIPPERS. The AQD has determined that it is appropriate to eliminate the weekly sampling requirement and require monthly sampling instead. Therefore, the AQD has revised SC VI.1 of FGAIRSTRIPPERS to reflect this change.

Additionally, during the review of Buckeye's Working Draft ROP and during subsequent discussions, Buckeye River Rouge Terminal requested a change in the timeframe and frequency of the periodic testing required in SC V.1 of EULOADRACK to make the requirement consistent with similar ROP conditions for loading racks. The ROP required stack testing within 6 months of permit issuance and within 6 months of permit expiration. Upon further review, the AQD has determined that the stack testing special condition originated in Buckeye's initial ROP, issued in 2008. Therefore, it is appropriate to adjust the timing and frequency of the stack tests during the ROP evaluation process. The AQD has granted this request and revised the ROP. Finally, Buckeye requested a clarification for SC III.14 of EULOADRACK to clarify that the loading rack can operate while the other permitted control devices are being used. AQD made this change and also made a corresponding clarification for SC III.2 of EULOADRACK.

#### Changes to April 6, 2015 Draft ROP

During the AQD review, the following changes were made to the draft ROP. Throughout the document the AQD added supportive clarifications to conditions in Emission Unit and Flexible Group IDs related to the Draft ROP and Staff Report.

#### Changes to draft ROP based on comments received:

On page 13 of the ROP, the AQD replaced conditions SC IX.1 through SC IX.5 of the Source-Wide Conditions, with SC IX.1 through SC IX. III. The revised conditions incorporate the provisions of 40 CFR 63.420(d) instead of 40 CFR 63.420(c).

On pages 14 and 16 of the ROP, the AQD revised the description for EUTANK57 to indicate that distillate fuel oil is stored in the tank. Also, on page 16, AQD revised SC VI.2 and clarified how the permittee shall determine the true vapor pressure for materials stored in EUTANK57.

On page 18 of the ROP, for EULOADRACK, the language in SC III.2 was revised as follows: The permittee shall not operate the petroleum product truck loading rack unless the vapor recovery system or vapor combustion unit is installed and operating properly.

On page 19 of the ROP, for EULOADRACK, the language in SC III.4b was revised as follows: The permittee shall notify the owner of operator of each non vapor-tight gasoline tank at the facility within 1 week after the documentation cross-check required in SC III.4a and 40 CFR §60.502(e)(3).

On page 20 of the ROP, for EULOADRACK, the language in SC III.14 was revised as follows: The permittee shall not operate the Portable Vapor Combustion Unit (PVCU) authorized under this emission unit unless the PVCU is located in the shaded area indicated on the site plan in Appendix 9.

On page 20 of the ROP, for EULOADRACK, a reference to the procedures identified in 40 CFR §60.503(d) was added to SC IV.3.

On pages 20 and 21, for SC V.1 of EULOADRACK, the AQD revised the condition as follows: Within 365 days of the issuance date of this permit and once every 5 consecutive years thereafter, the permittee shall verify the VOC emission rate from EULOADRACK, by testing, in accordance with Department requirements. Not less than 30 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Not less than 7 days prior to the tests, the permittee shall notify the AQD in writing of the time and place of the tests and who shall conduct them. 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.

On page 39, the AQD revised SC VI.1 of FGAIRSTRIPPERS by changing the monitoring and sampling requirement to a monthly basis.

Finally, on page 47, in Appendix 7, AQD added an equation to calculate maximum true vapor pressure for EUTANK57.