

VAPOR RECOVERY UNIT MAINTENANCE & INSPECTION PLAN

NILES LIGHT PRODUCT TERMINAL – MPLX TERMINALS LLC

1.0 INTRODUCTION

This Maintenance and Inspection Plan is developed pursuant to Rule 336.1213(3) of Michigan's Administrative Rules for Air Pollution Control. The purpose of this plan is to describe the standard operating procedures that will be used to inspect and maintain the primary Vapor Control Systems (VCS) at the Niles North Load Rack (EURACK-NORTH) and Niles South Load Rack (EURACK-SOUTH). The primary VCS at both Niles North and Niles South Load Racks are carbon adsorption systems using a Vapor Recovery Unit (VRU).

The maintenance and inspection program includes the following elements:

- Description of the items or conditions that shall be inspected
- The frequency of inspection or maintenance
- Responsible position or group

2.0 MAINTENANCE AND INSPECTION PROGRAM

This program is designed to establish a maintenance and inspection schedule for key equipment and accessories associated with the VRUs not already covered through the Compliance Assurance Monitoring Plan (CAM) and Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities - Notice of Compliance Status (NOCS). Components of the VRUs that need to be inspected or maintained, the frequency of inspection or maintenance, and the group responsible, are listed in **Table 1**.

MPLX Terminals LLC will keep a record of equipment inspection and maintenance activities conducted in accordance with this plan. The records, which will be kept for five years, will include the following information:

- Date of inspection
- Inspector's name or initials
- Description of inspection or maintenance
- Comments and additional information, as necessary

Table 1 – Inspection & Maintenance Program

Items Inspected	Frequency of Inspection*	Responsibility	Recordkeeping
VRU	Weekly Inspection: 1. Check motors and pumps for unusual noises 2. Verify glycol level	Terminal Operations	Electronic documentation
VRU Motors and Pumps	Annual Preventative Maintenance: Service the motors and pumps.	M&VCS Specialist	Electronic documentation
Electrical Panel	Annual Preventative Maintenance: Check PLC components, tighten wiring, and check fuses.	M&VCS Specialist	Electronic documentation
Vacuum System	Annual Preventative Maintenance: Conduct a leak test on each carbon bed.	M&VCS Specialist	Electronic documentation
Emergency Shutdown Faults	Annual Preventative Maintenance: Verify loading shutdown with fault conditions / testing.	M&VCS Specialist	Electronic documentation

***Note:** Inspections and Maintenance are not required if the VRU is not in service and/or gasoline truck loading is not occurring at the load rack.