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DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

A983149336

FACILITY: MARATHON PETROLEUM COMPANY LP		SRN / ID: A9831
LOCATION: 1001 S Oakwood, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Victor Brzeg , HES Professional		ACTIVITY DATE: 06/06/2019
STAFF: Jorge Acevedo	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MEGASITE
SUBJECT: Terminal - Loading Racks		
RESOLVED COMPLAINTS:		

MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT
LAKES, and ENERGY
AIR QUALITY DIVISION
INSPECTION REPORT

COMPANY NAME :Marathon Petroleum Company-
 FACILITY ADDRESS :1001 Oakwood, Detroit, MI 48217
 STATE REGISTRAT. NUMBER :A9831
 SIC CODE :2911
 EPA SOURCE CLASS : A
 EPA POLLUTANT CLASS : Mega Site
 LEVEL OF INSPECTION : :PCE
 DATE OF INSPECTION :06/6/19
 TIME OF INSPECTION : 9:30 AM
 DATE OF REPORT : 7/24/19
 REASON FOR INSPECTION : Partial Compliance Inspection.
 INSPECTED BY : Jorge Acevedo
 PERSONNEL PRESENT : Victor Brzeg
 FACILITY PHONE NUMBER :
 FACILITY FAX NUMBER :

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INSPECTION NARRATIVE:

On June 6, 2019, I conducted a partial compliance evaluation of the Marathon Petroleum Light Products Terminal. I arrived at 9:35 AM and met with Victor Brzeg. Mark Dziadoz, of Technical Programs Unit, was already onsite. Marathon was conducting a CEMS Rata to determine the accuracy of their continuous monitor.

The Terminal started the RATA at 6:00AM. Josh Hall was onsite for Marathon as the project leader for the RATA. Mr. Hall said that they performed a bias check at 9:58AM. While onsite, I observed measurements(in ppm) of the Reference Method for Runs 1-8. Spot checks on the CEMS indicated that the Reference Method and CEMS were in close agreement.

	NHMC	CH4	THC
Run 1	.015	.47	.05
Run 2	.02	.67	.07
Run 3	.04	1.74	.13
Run 4	.04	1.29	.09

Run 5	.02
Run 6	.039
Run 7	.02
Run 8	.02

The Terminal was full in terms of the amount of trucks loading fuel, so there was no issue with having enough loading to fulfill the RATA requirements.

I received records from Mr. Brzerg via email later in the week. I left the facility at 12:10PM.

The RATA test report was received on June 23, 2019. Results showed the CEM passed the required 10% relative accuracy.

FACILITY BACKGROUND

Marathon Petroleum Company owns and operates a bulk distribution light products terminal. The terminal is adjacent to the Refinery and is considered to be part of the single source. Light liquids including gasoline and diesel are loaded through a six lane loading rack. Emissions from light liquid loading are controlled with an activated carbon adsorber vapor recovery unit and a backup portable vapor combustion unit.

COMPLAINT/COMPLIANCE HISTORY

The Light Products Terminal has not had a Violation Notice issued in the last couple of years.

OUTSTANDING CONSENT ORDERS

None

OUTSTANDING LOVs

None

OPERATING SCHEDULE/PRODUCTION RATE

The Light Products Terminal runs 24 hours a day, 7 days a week.

PROCESS DESCRIPTION

Gasoline and diesel are loaded at an six lane loading rack. Emissions are controlled through a VRU and backup portable vapor combustion unit.

EQUIPMENT AND PROCESS CONTROLS

Six lane loading rack controlled with VRU and portable vapor combustion unit.

APPLICABLE RULES/PERMIT CONDITIONS:

Marathon Petroleum Company is subject to the ROP because they are major for NSR and Title V. They are a major source for Hazardous Pollutants. ROP-MI-A9831-2012 was issued on September 27, 2012.

The Light Products Terminal covered under the ROP and PTI 52-15

Permit Conditions are evaluated in Appendix A:

EUNLOADINGRACKS-S2	Six lane loading rack and associated vapor recovery unit. Includes use of backup, portable vapor combustion unit during extended malfunction/breakdown/maintenance of primary device.	01/01/1986	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 336.1290.			

The following conditions apply to: EULOADINGRACKS-S2

DESCRIPTION: Six lane loading rack and associated vapor recovery unit. Includes use of backup, portable vapor combustion unit during extended malfunction/breakdown/maintenance of primary device.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Activated Carbon Adsorber, Backup Portable Vapor Combustor, VACVAS

I. EMISSION LIMITS

1. The permittee shall not allow the VOC emissions from the vapor control system for EULOADINGRACKS-S2 to exceed 0.084 pounds per 1000 gallons (10 mg/L) of gasoline loaded, averaged over six (6) hours during which at least 300,000 liters of gasoline are loaded. Compliance with this limit shall be considered compliance with the limits of R 336.1609(2) and 40 CFR 502(b) and (c) which have been subsumed under this streamlined requirement. (R 336.1225, R 336.1702(a), 40 CFR 63.422(b), 40 CFR 60.502(b) and (c), R 336.1609(2))

Compliance- Stack tests showed that portable combustor met emission limit. Test was done 2014. The facility has a CEMS for the VRU. Periodic reports do not show excess emissions.

2. The permittee shall not allow the VOC emissions from the vapor control system for EULOADINGRACKS-S2 to exceed 0.063 pounds per 1000 gallons (7.5 mg/L) of gasoline loaded based upon a 12 month rolling time period, as determined at the end of each calendar month. (R 336.1205(3))

Compliance- Stack tests showed that portable combustor met emission limit. Test was done 2014. The facility has a CEMS for the VRU. Periodic reports do not show excess emissions.

3. The permittee shall not allow the VOC emissions from the vapor control system for EULOADINGRACKS-S2 to exceed 31.2 tons per year, based upon a 12 month rolling time period, as determined at the end of each calendar month. (R 336.1205(3))

Compliance- Records received showed that emissions were well below 31.2 TPY

II. MATERIAL LIMITS

1. The permittee shall not allow the gasoline throughput for EULOADINGRACKS-S2 to exceed 1,000,000,000 gallons per year, based upon a 12 month rolling time period, as determined at the end of each calendar month. (R 336.1205(3), R 336.1227(2))

Compliance- Records show that gasoline throughput as of May 2019 was 542 million gallons.

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate the product loading racks unless Part 55 of Michigan Act 451 of 1994, Administrative Rules 609 and 627 are met. (R 336.1609, R 336.1627)
Undetermined- This was not evaluated at time of the inspection. However, I did not pick up any strong odors and it appeared that were sufficient control at the facility when loading trucks.
2. The permittee shall not operate the product loading racks unless the vapor collection system (activated

carbon adsorption system or the backup portable vapor combustion unit) is installed and operating properly. Proper operation of the backup portable vapor combustion unit includes maintaining a six-hour average minimum flame chamber (firebox) temperature of 595 degrees Fahrenheit. (R 336.1205 (3), R 336.1225, R 336.1702(a), R 336.1910, 40 CFR 63.427(a)(3) and 40 CFR 63.427(b))

Compliance- Control equipment appeared to be operating correctly. CEMS RATA showed that emissions were minimal. A spot check of the records indicated that temps were above 595 degrees Fahrenheit.

3. The permittee shall not load, or allow the loading of, any organic compound that has a true vapor pressure of more than 1.5 psia at actual conditions from any stationary vessel into any delivery vessel located at an existing loading facility which has a throughput of 5,000,000 or more gallons of such compounds per year, unless such delivery vessel is controlled by a vapor recovery system that captures all displaced organic vapor and air by means of a vapor-tight collection line and recovers the organic vapor. Compliance with this requirement shall be considered compliance with the requirements of 40 CFR 60.502(a), which has been subsumed under this streamlined requirement. (R 336.1609(2))

Compliance- Loading racks have a vacuum system conveying vapors to VRU.

4. Any delivery vessel located at a facility that is subject to the provisions of R 336.1609(2) shall be equipped, maintained or controlled with all of the following: (R 336.1609(3))
 - a. An interlocking system or procedure to ensure that the vapor-tight collection line is connected before any organic compound can be loaded.
 - b. A device to ensure that the vapor-tight collection line shall close upon disconnection so as to prevent the release of organic vapor.
 - c. 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.
 - d. 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.
 - e. Hatch openings that are kept closed and vapor-tight during the loading of the delivery vessel.

Undetermined- Evaluation with Rule 609 was not evaluated at the time of the inspection. Observations (Sight, smell, etc) indicated that it appeared that trucks were being loaded properly.

5. Permittee shall develop written procedures for the operation of all such control measures. Such procedures shall be posted in an accessible, conspicuous location near the loading device. (R 336.1609 (4))

Compliance- Directions are posted for truck operators.

6. The permittee shall not operate EULOADGRACKS-S2 unless the approved malfunction abatement plan (MAP) for the VACVAS system 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 that is serviced by the VACVAS system 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 336.1702(a), R 336.1910, R 336.1911, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))

Compliance- MAP is implemented and maintained.

IV. DESIGN/EQUIPMENT PARAMETERS

1. 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))

Compliance- Vapor collection system consists of vacuum system.

V. TESTING/SAMPLING

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

1. Upon request, the permittee shall verify the VOC emission rate from the vapor control system for EULOADGRACKS-S2 by testing at owner's expense, in accordance with Department requirements. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. 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. (40 CFR 63.425(a)(1)), R 336.1213(3))

Compliance- Facility has CEMS

2. The permittee shall conduct Annual certification testing for all the cargo tank trucks loaded at the facility (pressure – vacuum test cargo tanks) in accordance with EPA Federal Reference Method 27, Appendix A,

40 CFR Part 60 for the pressure and vacuum test for the gasoline cargo tanks. (40 CFR 63.425(e)(1))
 Undetermined- This was not evaluated at this time. However, the facility employs a database of all trucks and will not allow a truck without certification to enter the facility.

3. The permittee shall conduct an Annual certification for all the cargo tank trucks loaded at the facility (pressure test cargo tanks internal vapor valve) in accordance with EPA Federal Reference Method 27, Appendix A, 40 CFR Part 60 for the pressure test for the internal vapor valves. (40 CFR 63.425(e)(2))

Undetermined- This was not evaluated at this time. However, the facility employs a database of all trucks and will not allow a truck without certification to enter the facility.

See Appendix 5-S2

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep records of the EUNLOADINGRACKS-S2 throughput of gasoline for each calendar month and 12-month rolling time period. The permittee shall keep all records on file at the facility at the facility and make them available to the Department upon request. (R 336.1205(3))

Compliance- Records are kept

2. Amount of organic compounds handled by the loading racks. (R 336.1205(3))

Compliance- Records are kept

3. When EUNLOADINGRACKS-S2 is operating, the permittee shall monitor temperature in the flame chamber (firebox) in the backup portable vapor combustion unit on a continuous basis during operation to indicate proper destruction of captured emissions. Monitoring records shall be maintained in a satisfactory manner and made available to the Department upon request. (R 336.1910, R 336.1213(3))

Compliance- Temperature is monitored.

4. The permittee shall properly maintain the backup, portable vapor combustion unit monitoring system including keeping ready access parts for routine repair of the monitoring equipment. (R 336.1910))

Compliance- Backup portable vapor combustion unit is monitored.

See Appendices 3-S2 and 4-S2

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVVRU	16 ¹	20 ¹	R 336.1225
2. SVVRU-	78 ¹	13 ¹	R 336.1225

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Undetermined- Stacks were not measured but appeared to be appropriate height and diameter.

NOTE: The exhaust gases from the SVVRU are not exhausted unobstructed vertically. However, the emissions from this emission unit were modeled taking the shape of the stack into account.

IX. OTHER REQUIREMENTS

1. Permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 63, Subparts A and R, National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations). (40 CFR Part 63 Subpart A and R)

Undetermined- This was not determined at the time of the inspection.

2. Permittee shall comply with all applicable requirements of Standards of Performance for New Source Stationary Sources, 40 CFR Part 60, Subparts A and XX, Standards of Performance for Bulk Gasoline Terminals. (40 CFR Part 60 Subpart XX)

Undetermined- This was not determined at the time of inspection. Emissions based on the RATA appear to be well below the limit set in Subpart XX.

3. Permittee who operates a bulk gasoline terminal subject to the provisions of 40 CFR Part 63, Subpart R that is also subject to 40 CFR Part 60, Subpart Kb or XX shall comply only with the provisions in each subpart that contain the most stringent control requirements for that facility. (40 CFR 63.420(g))

Compliance- Facility complies with most stringent limit.

4. Permittee shall not load or unload any gasoline tank truck unless it meets the testing requirements of Michigan Administrative Rule R 336.1627. (R 336.1627)(3))

Compliance- Facility keeps database for each truck and each truck has to badge in. Truck not meeting requirements will not be allowed to enter facility.

5. Loading of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures: (40 CFR 60.502(e))

- a. Permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline tank truck which is to be loaded at the facility. (40 CFR 60.502(e)(1))
- b. Permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the facility. (40 CFR 60.502(e)(2))
- c. Permittee shall cross check each tank identification number obtained in Condition 5(b) with the file of tank truck vapor tightness documentation within two weeks after the corresponding tank is loaded unless either of the following conditions is maintained. (40 CFR 60.502(e)(3)(i))
 - i. If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or (40 CFR 60.502(e)(3)(i)(A))
 - ii. If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross check shall be performed semiannually. (40 CFR 60.502(e)(3)(i)(B))
 - iii. If either the quarterly or semiannual cross-check provided in 40 CFR 60.502(3)(e)(i) (A) through (B) reveals that these conditions were not maintained, the permittee must return to biweekly monitoring until such time as these conditions are again met.

(40 CFR 60.502(e)(3)(ii))

- d. Permittee shall notify the owner or operator of each non vapor-tight gasoline tank truck loaded at the facility within one week of the documentation cross-check in 40 CFR 60.502(e) (3). **(40 CFR 60.502(e)(4))**
- e. Permittee shall take steps assuring that the non vapor-tight gasoline tank truck will not be reloaded at the facility until vapor tightness documentation for that tank is obtained which documents that:
 - i. The tank truck or railcar gasoline cargo tank meets the test requirements in §63.425(e), or the railcar gasoline cargo tank meets applicable test requirements in §63.425(i);
 - ii. For each gasoline cargo tank failing the test in §63.425 (f) or (g) at the facility, the cargo tank either:
 - A. Before repair work is performed on the cargo tank, meets the test requirements in §63.425 (g) or (h), or
 - B. After repair work is performed on the cargo tank before or during the tests in §63.425 (g) or (h), subsequently passes the annual certification test described in §63.425(e). **(40 CFR 63.422(c)(2), 40 CFR 60.502(e)(5))**

Compliance- Facility keeps database for each truck and each truck has to badge in. Truck not meeting requirements will not be allowed to enter facility.

- 6. Permittee shall act to assure that loading of gasoline tank trucks at the facility are made only into tank trucks that are compatible with the terminal's vapor collection system. **(40 CFR 60.502(f))**

Compliance- Trucks entering facility must be compatible with vapor collection system.

- 7. Permittee shall act to assure that the terminal's and tank truck's vapor collection system are connected during each loading of a gasoline tank truck at the facility. **(40 CFR 60.502(g))**

Compliance- No leaks were detected from observations with IR camera.

- 8. 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) for equipment in EULOADINGRACKS-S2. The notification shall be submitted 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.¹ **(R 336.1225(4))**

Compliance- Land use has stayed the same.

Vapor Collection System

- 9. The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in delivery tank from exceeding 450 mm of water during product loading. **(40 CFR 60.502(h))**

Compliance- Facility maintains database of compatible trucks meeting requirement.

- 10. No pressure vacuum-vent in the bulk gasoline terminal's vapor collection system shall begin to open at system pressure less than 450 mm of water. **(40 CFR 60.502(i))**

Undetermined- This was not evaluated at time of inspection.

- 11. 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 the total organic compounds liquid or vapor leaks. For the purpose of this inspection, detection methods such as sight, sound or smell are acceptable. **(40 CFR 60.502(j))**

Compliance- Facility does LDAR checks to detect leaks.

- 12. Permittee shall repair the source of the leak within 15 calendar days after it is detected. **(40 CFR 60.502(j))**

Compliance- Facility conducts LDAR and reports quarterly their findings.

13. Permittee shall not operate the delivery vessel which is to be controlled by a vapor collection system such as a vapor balance system or vapor recovery system unless the following conditions 15 and 16 are met. (R 336.1627(1))

Undetermined- Compliance was not evaluated with this condition at the time of the inspection.

14. The delivery vessels shall not sustain a pressure change of more than 1 inch of water in 5 minutes when pressurized to 18 inches water, gauge, or evacuated to 6 inches of water, gauge, using the test procedure described in EPA Reference Test Method 27 in 40 CFR 60 Appendix A. Compliance with these requirements shall be considered compliance with the requirements of R 336.1627(2) which have been subsumed under the streamlined requirement 40 CFR 63.425(e)(1). (40 CFR 63.425(e)(1), R 336.1225)

Undetermined- Facility does keep database of complying delivery vessels and non-complying vessels are prohibited from entering.

15. There shall be no visible liquid leaks from the vessel or collection system, except when the disconnection of dry breaks in liquid lines produces a few drops of liquid. (R 336.1627(5))

Undetermined- This was not evaluated at the time of the inspection.

16. The permittee shall not operate any vapor collection system, either vapor balance or recovery system unless all of the provisions of R 336.1627(6) through (10) are met. (R 336.1627(6))

Undetermined- This was not evaluated at the time of the inspection.

17. There shall be no gas detector reading greater than or equal to 100 percent of the lower explosive limit at a distance 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 R 336.2005. (R 336.1627(7))

Undetermined- Facility does conduct LDAR and reports their findings on a quarterly basis.

18. 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. (R 336.1627(8))

Undetermined- Compliance was not evaluated during the inspection. Observations while at the RATA did not indicate that leaks from loading were occurring.

19. 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 (422 mm of water) and to prevent vacuum from exceeding -0.2 pounds per square inch gauge (-141 mm of water). (R 336.1627(9))

Compliance- Vacuum system is used to comply with requirement.

20. Any delivery vessel or component of a vapor collection system that fails to meet any provision of the requirements of Rule R 336.1627 shall not be operated until the necessary repairs have been made, the vessel or collection system has been re-tested and the tests results have been submitted to the Division. (R 336.1627(11))

Compliance- Facility maintains a database of complying delivery vessels. Non-Complying vessels are prohibited from entering facility.

21. When a leak is detected, an initial attempt at repair shall be made as soon as practicable but no later than five calendar days after the leak is detected. (40 CFR 63.424(c))

Compliance- Past reviews of quarterly reports indicate that facility is meeting 5 day deadline.

22. Repair or replacement of the leaking equipment shall be completed within 15 days after detection of each leak except as required by 40 CFR 63.424(d). (40 CFR 63.424(c))

Compliance- LDAR is conducted monthly and reported quarterly.

23. Delay of repair of leaking equipment will be allowed upon a demonstration to the EPA Administrator that repair within 15 days is not feasible. Permittee shall provide the reason(s) a delay is needed and the date by which each repair is expected to be completed. (40 CFR 63.424(d))

Compliance- No delay of repair components have been reported.

24. Permittee shall not allow gasoline to be handled in a manner that would result in vapor release to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to the following: (40 CFR 63.424(g))
- Minimize the gasoline spills. (40 CFR 63.424(g)(1))
 - Clean up the spills as expeditiously as practicable. (40 CFR 63.424(g)(2))
 - Cover all open gasoline containers with a gasketed seal when not in use. (40 CFR 63.424(g)(3))
 - Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators. (40 CFR 63.424(g)(4))

Compliance- I did not observe spills but facility has contingency plans for spills. Spills are accounted for in annual total annual benzene report .

25. Permittee shall conduct a performance test on the vapor processing system according to test methods and procedures in 40 CFR 60.503, except a reading of 500 ppm (INSTEAD OF 10,000 ppm) shall be used to determine the leaks to be repaired under 40 CFR 60.503(b). Compliance with this requirement shall be considered compliance with the requirements of 40 CFR 60.503(b), which has been subsumed under this streamlined requirement. (40 CFR 63.425(a))

Compliance- Facility conducts LDAR and submits quarterly reports.

26. Permittee shall operate the backup, portable vapor combustion unit in a manner not to go below the operating parameter value described in Condition 3 of Appendix 3-S2. (40 CFR 63.427(b))

Compliance- Facility monitors temperature of backup portable vapor combustion unit.

27. Permittee shall comply with the applicable requirements of 40 CFR Part 61, Subpart FF, National Emission Standards for Benzene Waste Operations, as specified in paragraphs 18 and 19 of Consent Decree and any revisions thereto. (Consent Decree No. 01-40119)

Compliance- Facility inspects and submits reports quarterly updating Benzene inspection activities.

28. Effective from the Date of Entry of the Consent Decree until its termination, MAP agrees that the Detroit Refinery Light products Terminal, herein identified as Section 2 of the Detroit Refinery, is covered by this Consent Decree.

Compliance- Facility is subject to Consent Decree.

29. Permittee shall ensure that controls are on all subject components of the individual drain systems that are located at the Detroit Light Products Terminal and are in compliance as follows:

- The Truck Loading Terminal area aqueous benzene waste shall be routed through a system controlled pursuant to the requirements of 40 CFR Part 61, Subpart FF. (Consent Decree No. 01-40119 and any revisions thereto.)

Compliance- Facility complies with Consent Decree and submits compliance updates periodically.

30. The permittee shall not operate EUNLOADINGRACKS-S2 unless the VACVAS system is installed, maintained, and operated in a satisfactory manner. Satisfactory operation shall include but is not limited to maintaining pressure across the VACVAS system per manufacturer specifications; these specifications shall be included in the MAP, as required by SC III.6. (R 336.1225, R 336.1702(a), R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))

Compliance- VACVAS was installed and appeared to operating satisfactorily.

31. The permittee shall not operate EUNLOADINGRACKS-S2 for more than 58,900,000 gallons of gasoline per year without the VACVAS system operating consistent with the MAP (required under SC III.6). The 58,900,000 gallons per year dispensed shall include times of malfunction of the VACVAS system and general maintenance performed on the VACVAS system as allowed by the MAP. The gallon per year limit is based on a 12-month rolling time period as determined at the end of each calendar month. (R 336.1225, R 336.1702(a), R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))

Compliance- Records are kept and were received.

32. The permittee shall keep, in a satisfactory manner, for EUNLOADINGRACKS-S2, monthly and 12-month rolling time period records of the gallons of gasoline dispensed when the VACVAS system is not operating. The permittee shall keep all records on file at the facility for a period of at least five years and make them available to the Department upon request. (R 336.1225, R 336.1702(a), R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))

Compliance- Records are kept and were received

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:

N/A

MAERS REPORT REVIEW:

Pollutant	2018 Emissions(TPY)(Total Source)
CO	127
NOx	351
PM	92
Sox	168
VOC	321

FINAL COMPLIANCE DETERMINATION:

Based on observations at the CEMs RATA and review of records received, the facility appears to be in compliance. Results of the RATA indicate that the CEMS is measuring accurately.

NAME Jay Al

DATE 7-24-19

SUPERVISOR W.M.