

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

B920638432

FACILITY: Sunoco Partners Marketing & Terminals LP - Romulus		SRN / ID: B9206
LOCATION: 29120 WICK RD, ROMULUS		DISTRICT: Detroit
CITY: ROMULUS		COUNTY: WAYNE
CONTACT: Lisa Fishbeck , Environmental Specialist		ACTIVITY DATE: 01/26/2017
STAFF: Katherine Koster	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY2017 Scheduled Inspection		
RESOLVED COMPLAINTS:		

REASON FOR INSPECTION: Targeted Inspection

INSPECTED BY: Katie Koster, AQD

PERSONNEL PRESENT: Adam Stoner, Terminal Operator; Lisa Fishbeck, Sunoco Environmental Specialist

FACILITY BACKGROUND

Sunoco Logistics, Sunoco Partners Marketing and Terminals, L.P. (Sunoco) Romulus Terminal is located northeast of the intersection of Middlebelt and Wick Roads in Romulus. This facility was formerly owned and operated by RKA Petroleum until it was purchased by Sunoco in September 2009. The facility is a bulk terminal for gasoline, ethanol, jet fuels, diesel fuel, and additives. The facility is capable of operating 24 hours per day, 365 days per year. There are 4 terminal operators.

COMPLAINT/COMPLIANCE HISTORY

When operating as RKA Petroleum, the facility exceeded the gasoline throughput limit. A violation notice was issued. The limit was increased through a permit modification in 2007 (PTI 386-97A). Additionally, Sunoco modified the permit to obtain a higher jet fuel throughput limit (PTI 386-97B) in 2008.

Since Sunoco become the owner of the facility, no violation notices have been issued.

OUTSTANDING CONSENT ORDERS

None

OUTSTANDING LOVs

None

INSPECTION NARRATIVE

AQD inspector, Katie Koster, arrived at the Sunoco facility on January 26, 2017 at 9:30 a.m. I met with Mr. Adam Stoner, Terminal Operator and Ms. Lisa Fishbeck, Environmental Specialist. We started the inspection in a conference room where we discussed required permit records.

The facility receives various fuels through pipelines and loads them into tank trucks using a loading rack. The various fuels are dispensed into tanker trucks via a 5 bay loading rack. There are five arms per bay. Additives are added at the rack. The loading rack requires control equipment in the form of a Vapor Recovery Unit (VRU). The unit consists of two regenerative carbon beds alternating between adsorbing and desorbing. The VRU is a John Zink Vapor Recovery Unit. The facility is allowed per PTI 386-97B to operate a portable Vapor Combustion Unit (VCU) when the VRU is down for maintenance. Emissions from the VRU are monitored continuously by a continuous emissions monitoring system (CEMS) which records VOC emissions as percent propane.

Unlike RKA, Sunoco does not own the delivery vessels. As such, the Romulus terminal is not involved in performing vapor tightness testing. Truck tanker vapor tightness certifications are submitted by the fuel carriers to the Sunoco central office in Pennsylvania and are electronically available to any of its terminals.

The following is a description of the current storage tanks on-site (Appendix A):

**Tank 1: Internal Floating Roof installed in 1957; Primary and Secondary Seals
Contents: Regular Unleaded Gasoline**

**Tank 2: Internal Floating Roof installed in 1957; Primary and Secondary Seals
Contents: Premium Unleaded Gasoline**

**Tank 3: Fixed Cone Roof installed in 1964
Contents: Ultra Low Sulfur Diesel Fuel**

**Tank 4: Fixed Cone Roof installed in 1964
Contents: Jet-A fuel**

**Tank 5: Internal Floating Roof installed in 1973; Primary and Secondary seals
Contents: Regular Unleaded gasoline**

**Tank 6: Internal Floating Roof installed in 1973; Primary and Secondary seals
Contents: Jet-A1 fuel**

**Tank 7: Internal Floating Roof installed in 2006
Contents: Ethanol
Oil/water separator**

Tanks A-200 to A-205: Each tank is 15,000 gallon capacity and used for ultra low sulfur diesel or biodiesel

Tanks A-100-102: Biofuel

**Tank A-103: Skid Tank - REMOVED
Capacity: 550 gallons
Contents: Diesel Additive**

**Tank A-104: Cone Roof tank installed in 1964
Contents: Transmix**

**Tank A-105: 500 gallon capacity - REMOVED
Contents: Red dye additive**

**Tank A-106: 20,000 gallon capacity; Conservation vent
Contents: Gasoline additives**

Tank A-107: Winter ULSD additive 7476 gal

Tank A-108: Gasoline additive 10,027 gal

Tank A-109: Lubricity additive 550 gal

Tank A-131: Summer ULSD additive 1,000 gal

Tank A-133: REDDYE additive 1,000 gal

Tank A-134: De-icer jet additive 1,000 gal

**Tank B-1: Fiberglass sample tank installed in 1988 - REMOVED
Capacity: 550 gallons
Contents: Gasoline/Diesel Mixture**

Tank B-2: Fiberglass filter drain turbine installed in 1988 - REMOVED
Capacity: 1000 gallons

Tank B-3: Underground VRU knockout tank installed in 1982 - REMOVED
Capacity: 200 gallons
Contents: Gasoline/Diesel Mixture

B001 (Butane tank): 60,000 gal

Next, Mr. Stoner and Ms. Fishbeck accompanied me about the facility. The loading rack is five lanes with five to six arms per lane. Additional arms were added when the permit was modified in 2007 to allow for sidestream blending of fuels, as opposed to sequential. According to the facility, no changes have been made to the rack since my last visit. I visually observed the loading arms and VRU hoses at each loading bay. They appeared to be in good condition; absent of any cracks or holes. A small booth is present at each bay. In the booth, truckers insert a loading card which verifies that the trucker has all proper certifications, such as tightness testing, before loading is authorized and written procedures for loading are posted. While the facility is allowed to load some products without the VRU engaged under PTI 386-97B, Sunoco requires all loading to be conducted through the VRU. The rack will not even operate without the VRU in use.

We viewed the VRU unit which is located next to the loading rack. Vacuum gauges and temperatures throughout the bed are the main indicators that the VRU is operating properly. The carbon was replaced in both beds in December 2016. During that time, a portable VCU was used. The facility notified the AQD of this event. Also, a back up unit is allowed to be used in PTI 386-97B. The job took approximately 2 weeks to complete. When the Zink technician assesses the VRU he measures whether the beds are holding vacuum for 15 minutes and that the temperatures throughout the bed (top, middle, and bottom) at the start and end of the cycle are within 15 degrees of each other. The VRU alarms for high T, high pressure and product level. A CEMS installed per the area source MACT BBBBBB. According to the facility, there is a main CEMS and a back up CEMS. The VRU will shut down if there is a high 1 hour CEMS reading of % C3H8. The emission set point (i.e. the shutdown limit that would trigger automatic VRU shutdown) for Romulus Terminal is 1.53% for the 1 hour average. Note that this is SXL's self-implemented more stringent emission set point of 80% of the emission limit (30 mg/L = 1.91%). The facility stated that this has not occurred. I recorded the following parameters on the VRU system:

PI-301 (gasoline pressure to top of absorber) – 12
TI-302 (gasoline temperature return back to tank) – 82
TI-701 (gasoline temperature supply onto skid) – 51
PI601 (gasoline pressure return pump discharge) – 32
TI402 (seal fluid temperatures discharge from vacuum pump) – 80
PI302 (gasoline pressure to bottom of discharge) – 16

Bed 203 Temperatures from bottom were 1. Under 50 2. 75 3. Under 50 4. Under 50 VACUUM
Bed 103 Temperatures from bottom were 1. Under 50 2. 75 3. 75. 4. Under 50 VACUUM

All parameters were within the acceptable ranges in the MAP.
Tank 7 is set to be inspected in 2017; a letter was submitted to AQD by Sunoco on January 10, 2017.

There is a diesel fired generator on site. We viewed the generator.

Based on the information provided during the inspection and a review of the permit, additional records were requested (see attached emails).

APPLICABLE RULES/PERMIT CONDITIONS

Facility is operating under opt out permit 386-97B (Conditions are paraphrased for brevity). There are FGFACILITY wide limits on VOCs, individual HAPs and total HAPs.
EU-LOADRACK

EMISSION LIMITS

	Pollutant	Limit	Time Period	Equipment	
1.	VOC	37.5 tpy	12-month rolling time period*	EU-LOADRACK emissions through the VRU	IN COMPLIANCE. For the 2016 12 month time period, the highest emissions were in December 2016 at 12.1 tons.
2.	VOC	30 mg / l of organic compounds loaded	Test method	EU-LOADRACK emissions through the VRU or VCU	IN COMPLIANCE Stack test was conducted on 6/25/08. The resulting emissions were 7.565 mg VOC/L organics loaded. Test is not required again. Test results for the portable units were provided during the permit application to show the Jordan VCU's can meet the emission limit.
3.	VOC	8.3 tpy	12-month rolling time period*	EU-LOADRACK fugitive emissions	IN COMPLIANCE For the 2016 12 month time period, the highest emissions were in December 2016 at 1.34 tons.
4.	VOC	6.5 tpy	12-month rolling time period*	EU-LOADRACK emissions from uncontrolled product loading, as allowed by SC 1.2	IN COMPLIANCE According to facility personnel, facility does not perform any uncontrolled loading.

MATERIAL LIMITS

	Material	Limit	Time Period	Compliance Status
1	Gasoline	300,000,000 gallons per year	12-month rolling time period*	IN COMPLIANCE Based on 12 month rolling throughput records for 2016, the highest 12 month rolling gasoline plus ethanol throughput was 160,315,090 gal.
2.	Jet Kerosene	100,000,000 gallons per year	12-month rolling time period*	IN COMPLIANCE Based on 12 month rolling throughput records for 2016, the

			highest 12 month rolling throughput of jet kerosene throughput was 19,197,562 gallons.
3.	Total diesel and #2 fuel oil	110,000,000 gallons per year combined	12-month rolling time period* IN COMPLIANCE Based on 12 month rolling throughput records for 2016, the highest 12 month rolling distillate throughput was 67,615,759 gallons.
4.	Ethanol, including ethanol blended with gasoline	90,000,000 gallons per year	12-month rolling time period* IN COMPLIANCE Based on 12 month rolling throughput records for 2016, the highest 12 month rolling throughput of ethanol was 18,090,137 gallons.
5.	Ethanol (without the VRU operating)	800,000 gallons per 8 hour period	Rolling 8 hour period IN COMPLIANCE According to facility, no loading of ethanol without the VRU operating is allowed.
6.	Ethanol (without the VRU operating)	22,500,000 gallons per year	12-month rolling time period* IN COMPLIANCE According to facility, no loading of ethanol without the VRU operating is allowed.

III. Process/Operational Limits

1. **IN COMPLIANCE.** Delivery vessels are filled via submerged fill pipe. Vapor tight collection lines are installed on the rack at each bay. Vapor recovery system is in place and loading cannot commence unless the VRU is properly connected. No delivery vessels were loading at the time of inspection. Written procedures are posted at the rack.
2. **IN COMPLIANCE.** This condition is related to the provisions of Rule 627. Rule 627 testing has not been requested by the department. Loading was not occurring at the time of the inspection. Each delivery vessel is required to be certified through a tank truck pressure/vacuum test. If a truck is not up to date on certification, they are automatically locked out of the loading system. Example tank certification is attached.
3. **IN COMPLIANCE.** This condition is related to NSPS XX. The vapor collection system is installed and operating. Loading cannot commence unless truck has a valid vapor tightness certification and the VRU must be connected properly for loading to start. Procedures are posted. 3.b.d.f.and g. are related to the design of the system which was not evaluated during the inspection.
4. **DID NOT EVALUATE.** This condition is related to MACT BBBBBB. The AQD is not the delegated authority for 40 CFR Part 63, Subpart BBBBBB. Facility certifies compliance with 40 CFR Part 63 BBBBBB semi annually. a.)The rack is equipped with a vapor collection system and is limited to tanks that are vapor tight, b.) is related to design of the system which was not evaluated during the inspection c.) loading can only performed on certified vapor tight trucks. If the certification is not valid, the tanker is "lock out" of the system and unable to load.

5. **IN COMPLIANCE.** An updated malfunction abatement plan was provided during the inspection and is attached. The prior plan was received as part of the AQD inspection in 2010 and is in the facility file. The updated plan appears to contain required elements in Rule 911.

V. Testing

- 1 **IN COMPLIANCE.** Testing was performed to demonstrate compliance with NSPS XX on May 7, 2008 and was within the required time period of 180 days after trial operation. This was a carryover condition from the prior permit (386-97A) and the requirement had already been fulfilled when 386-97B was issued. 386-97A was issued on August 3, 2007. According to the terminal manager at the time, trial operation of the modified loading rack began on November 27, 2007. As such, testing was due by May 27, 2008. Testing is not required to recur in the NSPS. Test report was received after the 30 day deadline but enforcement discretion was applied.
2. **NOT APPLICABLE.** Testing under Rule 627(6) has not been requested by the department at this time.
3. **IN COMPLIANCE.** Permittee submitted a statement certifying the compliance status of EU-LOADRACK according to 40 CFR 63.11092(a): (2) If you are operating your gasoline loading rack in compliance with an enforceable State, local, or tribal rule or permit that requires your loading rack to meet an emission limit of 80 milligrams (mg), or less, per liter of gasoline loaded (mg/l), you may submit a statement by a responsible official of your facility certifying the compliance status of your loading rack in lieu of the test required under paragraph (a)(1) of this section.
Note, AQD is not the delegated authority for 40 CFR Part 63, Subpart BBBBBB.

VI. Monitoring/Recordkeeping

- 1 **IN COMPLIANCE.** Shall inspect vapor collection system, vapor processing system, and loading rack during loading monthly per NSPS XX. Sight, sounds, and smell detection methods acceptable. Monthly records were submitted and are attached.
3. **IN COMPLIANCE.** Shall keep monthly and 12 month rolling throughput records of the following: gasoline, jet kerosene, diesel and #2 fuel oil, ethanol (including blended with gasoline), and ethanol without VRU operating. Records are maintained and attached. No ethanol loading without the VRU occurs. Records are attached.
4. **IN COMPLIANCE.** Shall keep monthly and 12 month rolling records of the following:
- Controlled VOC emissions through the VRU. 12 month rolling records are attached.
 - Uncontrolled VOC emissions for products loaded without the VRU. N/A
 - Fugitive VOC emission calculations. This is a fixed number every year.
 - Miscellaneous VOC emission calculations. This is fixed number every year.
5. **IN COMPLIANCE.** Shall keep records of: compliance with leak test for delivery vessels, parts replacements and repairs and maintenance of VRU, VRU malfunctions/failures, VRU performance tests and emissions tests. Records are attached. Regarding 5.a., Records of leak test of the delivery vessels are required for owners of delivery vessels. Sunoco does not own the delivery vessels but they have truck tightness certifications available electronically from the tank owners. An example was provided and is attached.
6. a,b, **NOT APPLICABLE.** Facility is using the alternative compliance method described in condition e as they do not own the gasoline cargo tanks and do not perform the testing. However, facility maintains certifications from the owner/operator of the tankers and these are available electronically.
- IN COMPLIANCE.** Leak records are maintained. See attached example.
 - DID NOT DETERMINE.** Owner must keep documentation of all notifications.
 - IN COMPLIANCE.** Facility is using this alternative method of compliance and submitted notification on August 4, 2010 as required. This is the same as 5.a above.
 - IN COMPLIANCE.** Records of replacements or addition of components to the VRU are attached. See attached.
7. **DID NOT EVALUATE.** Facility is complying through 63.11094(c)(2). For facilities that use a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness

documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection by the Administrator's delegated representatives during the course of a site visit, or within a mutually agreeable time frame.

(i) The copy of each record in paragraph (c)(2) of this section is an exact duplicate image of the original paper record with certifying signatures.

(ii) The Administrator is notified in writing that each terminal using this alternative is in compliance with paragraph (c)(2) of this section.

However, this condition is related to MACT BBBB. The AQD is not the delegated authority for 40 CFR Part 63, Subpart BBBB.

8. IN COMPLIANCE – A CMS (i.e. a CEMS) is installed and maintained. Maintenance records were presented during the inspection.

9. DID NOT EVALUATE, Permittee shall keep records in 40 CFR 63.11094(f). Facility appears to be maintaining the appropriate records related to the CEMS, including recorded values, inspection and monitoring plan, and system malfunctions. However, the AQD is not the delegated authority for 40 CFR Part 63, Subpart BBBB.

VIII. Stacks

IN COMPLIANCE. Stack requirements for the VRU seem to be met upon visual observation. A VCU was not on site. VCU used in December had overall height (OAH) of 43 feet which is above the required minimum of 35 feet.

FG-IFRTANKS (tanks 1,2,5,6 and 7)

I. Emissions

1. IN COMPLIANCE. Based on 12 month rolling for 2016, the highest VOC emissions for those tanks was 9.8 tons. The limit is 11 tons per 12 month rolling basis. Note, the MAERS data includes emissions from tank cleanings and roof landings which results in total emissions above 11. However, according to Sunoco, the permit limit is based on throughput and does not include these instances. Based on a review of the file, that appears to be correct.

III. Process

1. IN COMPLIANCE. Floating roof tanks are in compliance with Rule 604.
2. IN COMPLIANCE. Facility certified Tank 7 is in compliance with criteria outlined in this condition. See facility file.

IV. Design/Equipment Parameters

1. IN COMPLIANCE. Tank deck and seals are as specified in the table.

VI. Monitoring

1. IN COMPLIANCE. Tank 7 was installed in 2007. Therefore, the 10 year inspection referenced in VI.1 (d) is due in 2017. AQD received written notification that it will be performed in 2017. Also, visual inspections are due once every 12 months. See attached for record of two most recent annual inspections.
2. IN COMPLIANCE. Required calculations have been completed by the 15th of the month.
3. IN COMPLIANCE. Tanks throughputs are maintained on a monthly and 12 month rolling basis.
4. IN COMPLIANCE. 12 month and monthly tank emissions records are maintained. Attached is the data for 2016.
5. IN COMPLIANCE. Dimension and capacity of Tank 7 are on file in facility records. Records of inspections of the tank are maintained. See above.

VII. Reporting

1. **IN COMPLIANCE.** Certification was submitted by Sunoco on August 4, 2010 and is in the facility file.
2. **IN COMPLIANCE.** Notification for 2017 inspection was received.

FG-FIXEDTANKS (tanks 3,4, and 104)**I. Emissions**

1. **IN COMPLIANCE.** Based on the 12 month rolling emissions for 2016, the highest VOC emissions for those tanks was 0.92 tons. The limit is 5 tons per 12 month rolling basis. Note, the MAERS data includes emissions from tank cleanings and roof landings. However, according to Sunoco, the permit limit is based on throughput and does not include these instances. Based on a review of the file, that appears to be correct.

IV. Design 1. IN COMPLIANCE. Tanks are equipped with conservation vents.

VI. Monitoring

2. **IN COMPLIANCE.** Shall keep records of throughput of each product on a monthly and 12 month rolling time period. Tank throughputs are maintained on a monthly and 12 month rolling basis.
3. **IN COMPLIANCE.** Monthly and 12 month rolling emissions have been maintained. See attached for 2016.

FG-FACILITY**I. Emission Limits**

1,2&3 – IN COMPLIANCE. Highest VOC 12 month rolling total for 2016 was 27.68 which is below the limit of 68.8 tons. Highest total HAP 12 month rolling total for 2013 was 1.26 tons which is below the limit of 13 tpy for combined HAPs and 8.9 tpy for individual HAP. Records are maintained. See Appendix A.

III. Process/Operational Restrictions

1. **DID NOT EVALUATE.** Shall comply with BBBB. The AQD is not the delegated authority for 40 CFR Part 63, Subpart BBBB.
2. **IN COMPLIANCE.** Shall operate in a manner consistent with good air pollution control practices. Based on inspection and maintenance records, this appears to be the case.

VI. Monitoring

2. **IN COMPLIANCE.** Shall keep monthly and 12 month rolling HAPs records. See Appendix A, Table 13.
3. **IN COMPLIANCE.** Shall notify the Department if a change in land use occurs. There had not been a change in land use. No notifications have been received.
4. **DID NOT EVALUATE.** Monthly leak inspections shall be conducted. Leaks shall be repaired within timeframes outlined in the condition. No leaks have been detected based on the records. This information is included in the semi annual reports. The AQD is not the delegated authority for 40 CFR Part 63, Subpart BBBB.
5. **DID NOT EVALUATE.** Permittee shall keep equipment leak records. Records appear to be maintained but the AQD is not the delegated authority for 40 CFR Part 63, Subpart BBBB.
6. **DID NOT EVALUATE.** Shall maintain records of malfunctions. Records appear to be maintained but the AQD is not the delegated authority for 40 CFR Part 63, Subpart BBBB.

VII. Reporting

1. **DID NOT EVALUATE.** Shall submit notifications and semi annual compliance reports. Reports have been submitted. However, the AQD is not the delegated authority for 40 CFR Part 63, Subpart BBBB.

Exempt Equipment – Update citations

TANKS 200-205 – 15,000 gallons each storing ultra low sulfur diesel. According to the permit eval form,

true vapor pressure for diesel fuel is .0045 psia. Diesel fuel does not have an IRSL or SRSL so therefore, it is considered non carcinogenic. As such, these tanks appear to meet the Rule 284(2)(i) exemption: Storage or transfer operations of volatile organic compounds or noncarcinogenic liquids in a vessel that has a capacity of not more than 40,000 gallons where the contents have a true vapor pressure of not more than 1.5 psia at the actual storage conditions.

Butane storage tank, size 60,000 gallons. Facility is applying 336.1284(j) as it claims boiling point is 0 Celsius or lower. MSDS's were submitted as proof during last inspection and are in the facility file.

Generator exempt per Rule 285(2)(g). Picture of nameplate attached. Size is 449 kW which is less than 10 MMBTU/hr input.

Tanks 100, 101, 102, 109, 106, 107, 108, 131, 133, 134 – Facility is using the R284(2)(i) exemption.

Heavy oil tank (Tank 6190) - This is the answer from the facility: "Tank 6190 is a 500 gallon slop tank consisting of transmix primarily from pipeline samples. It is not connected to the loading rack or any piping. It is either pumped off to Tank 5 or hauled offsite for proper disposal. The emissions for this tank are De Minimis. Refer to R 336.1290(2)(a)(i). The emissions from this tank are <1,000 lbs per month uncontrolled." AQD did not review monthly records.

NSPS

Facility is subject to Subpart Kb – Stds of Performance for Volatile Organic Liquid storage vessels (after July 23, 1984) for Tank 7 and Subpart XX - Stds of Performance for Bulk Gasoline Terminals

100,101,102, (all biofuel) – Kb is not applicable to these 3 biodiesel tanks because of the size of the tanks and the vapor pressure of the product. Tank 100 is 29,988 gallons (114 m³) and Tanks 101 and 102 are 33,840 gallons (128m³). These tanks are >75 m³ but <151 m³. The vapor pressure of biodiesel onsite is <2 mmHg (<0.27 kPa or <0.039 psi). Refer to the attached MSDS. See the Kb regulation below specifying the applicability of the regulation: *40 CFR Part 60 Subpart Kb Section 60.110b "(b) – This subpart does not apply to storage vessels with a capacity greater than or equal to 151 m³ 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 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure less than 15.0 kPa."*

108, 109, 131, 133, 134 are all exempt due to the size. Note, 19812 gallons = 75m³

The applicable conditions for these standards are incorporated in PTI 386-97A and carried over into 386-97B and have been evaluated above. RKA did not submit proper NSPS notification for Tank 7. Notification was submitted by Sunoco on August 4, 2010.

Michigan Part 6 Rules

Rules 604, 609 (tanks), and 627 (loading rack), apply to operations and are incorporated into PTI 386-97B and were addressed above.

NESHAPs/MACT's

Facility is currently an opt out source for HAP's and is not subject to NESHAPS R, EEEE

NESHAPS R, Er calculation is 0.693 which is less than the applicability threshold of 1.

And (a) The affected source to which the provisions of this subpart apply is each bulk gasoline terminal, except those bulk gasoline terminals: 63.420 (a)(2) For which the owner or operator has documented and recorded to the Administrator's satisfaction that the facility is not a major source, or is not located within a contiguous area and under common control of a facility that is a major source, as defined in §63.2 of subpart A of this part.

NESHAP EEEE, promulgated in 2004, applies to hazardous air pollutants (HAP) emitted from organic liquids distribution (OLD) (non-gasoline) operations at major sources of HAP emissions. This facility had an opt out limit at that time.

However, NESHAP Subpart BBBB, Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities, for area sources is applicable. Existing sources are required to be in compliance by January

2011. Compliance reports are submitted semi annually. However, the AQD is not the delegated authority for 40 CFR Part 63, Subpart BBBBBB.

There is a generator subject to the RICE MACT ZZZZ under existing emergency RICE at an area source. The size is 449 kW. Facility only uses ULSD in this generator which is provided from their terminal. The sulfur content is tested with each receipt of ULSD to ensure it is below 15 ppm sulfur. Most recent test from 1/21/2017 was 4.53 ppm. See attached. The hours of operation based on the non resettable hours meter was 477.2 hours and the generator was installed in 2002. The usage log for 2015 and 2016 is attached. However, the AQD does not have delegation of the RICE MACT so it was not fully evaluated for compliance.

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS

N/A. All lots are paved.

MAERS REPORT REVIEW

Facility is an opt out facility and subject to an NSPS, and is therefore subject to MAERS. The MAERS report for 2016 was submitted on time.

FINAL COMPLIANCE DETERMINATION

This facility appears to be in compliance with state and federal regulations at the time of inspection.

NAME Kate Kise DATE 3/27/17 SUPERVISOR W.M.