

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION**

July 9, 2019

PERMIT TO INSTALL
143-18A

ISSUED TO
Sunoco Marketing & Terminals, L.P.

LOCATED AT
500 South Dix Street
Detroit, Michigan

IN THE COUNTY OF
Wayne

STATE REGISTRATION NUMBER
B2926

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. 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: July 1, 2019	
DATE PERMIT TO INSTALL APPROVED: July 9, 2019	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Table of Contents

COMMON ACRONYMS	2
POLLUTANT / MEASUREMENT ABBREVIATIONS.....	3
GENERAL CONDITIONS	4
EMISSION UNIT SPECIAL CONDITIONS.....	6
EMISSION UNIT SUMMARY TABLE	6
EUDISLOADING.....	7
EU0033.....	8
FLEXIBLE GROUP SPECIAL CONDITIONS.....	10
FLEXIBLE GROUP SUMMARY TABLE	10
FGG&TLOADING.....	11
FGGASOLINETKS.....	15
FGDISTILLATETKS.....	19
FGFACILITY CONDITIONS.....	20
APPENDIX 1	22

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
EGLE	Michigan Department of Environment, Great Lakes, and Energy
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
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 ₂ 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 ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	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 ₂	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 Environment, Great Lakes, and Energy, 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 Environment, Great Lakes, and Energy. **(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.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUDISLOADING	Distillate truck loading rack	01/01/1947	NA
EUTRANSLOADING	Transmix truck loading rack	01/01/1947	FGG&TLOADING
EUGASLOADING	Gasoline truck loading rack	01/01/1947	FGG&TLOADING
EUTANK#38	Above ground fixed cone roof 1,182,926 gallons (gal) storage tank with internal floating roof	01/01/1947	FGGASOLINETKS
EUTANK#39	Above ground fixed cone roof 1,128,788 gallons (gal) storage tank with internal floating roof	01/01/1947	FGGASOLINETKS
EUTANK#42	Above ground fixed cone roof 160,000 gallons (gal) storage tank with internal floating roof	01/01/1996	FGGASOLINETKS
EUTANK#44	Above ground fixed cone roof 1,117,267 gallons (gal) storage tank with internal floating roof	01/01/1947	FGGASOLINETKS
EUTANK#50	Above ground fixed cone roof 60,240 gallons (gal) storage tank with internal floating roof	01/01/1955	FGGASOLINETKS
EUTANK#51	Above ground fixed cone roof 937,326 gallons (gal) storage tank with internal floating roof	01/01/1957	FGGASOLINETKS
EUTANK#67	Above ground fixed cone roof 740,780 gallons (gal) storage tank with internal floating roof	01/01/1973	FGGASOLINETKS
EUTANK#43	Above ground vertical fixed roof 597,289 gallons (gal) storage tank	01/01/1947	FGDISTILLATETKS
EUTANK#49	Above ground vertical fixed roof 798,271 gallons (gal) storage tank	01/01/1955	FGDISTILLATETKS
EU0033	Groundwater remediation system consisting of a QED Model EZ-Tray 6.4 air stripper, oil/water separator, pneumatic pumps, and top-loading free product recovery wells with no control	04/21/2005	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 336.1291.

EUDISLOADING EMISSION UNIT CONDITIONS
--

DESCRIPTION

Distillate truck loading rack

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall verify on a quarterly basis all requirements of true vapor pressure (as defined in R336.1120(i)) of all organic compounds stored, in psia at actual storage conditions. The records should be made available to the Division upon request. (R 336.1205(1)(a), R 336.1609)

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. Permittee shall not allow the loading of any organic compound with a true vapor pressure (as defined in R336.1120(i)) of more than 1.5 psia at actual conditions from any stationary vessel into any delivery vessel located at an existing loading facility. (R 336.1609)
2. The permittee shall comply with all of the applicable provisions of R336.1609. (R 336.1609)

EU0033
EMISSION UNIT CONDITIONS

DESCRIPTION

Groundwater remediation system consisting of a QED Model EZ-Tray 6.4 air stripper, oil/water separator, pneumatic pumps, and top-loading free product recovery wells with no control

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	1.4 ton per year	12-month rolling time period as determined at the end of each calendar month	EU0033	SC VI.2, 3, 4	R 336.1225, R 336.1702(a)
2. VOC	0.31 pounds per hour	Hourly	EU0033	SC VI.2, 3, 4	R 336.1225
3. Benzene	410 pounds per year	12-month rolling time period as determined at the end of each calendar month	EU0033	SC VI.2, 3, 4	R 336.1225
4. Naphthalene	250 pounds per year	12-month rolling time period as determined at the end of each calendar month	EU0033	SC VI.2, 3, 4	R 336.1225

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

- The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702(a))**

2. The permittee shall monitor and record, in a satisfactory manner, the flow rate, the total VOC concentration, the benzene concentration, and the naphthalene concentration of the air stripper influent and effluent water streams. This shall be done on a weekly basis until four valid samples, which pass all quality assurance and quality control requirements, have been obtained. Thereafter, these parameters shall be recorded on a quarterly basis. Weekly records, including calculation of VOC emission rates, shall be submitted to the AQD District Supervisor using Appendix 1 or an approved equivalent method, within 30 days following collection of each initial weekly sample. All quarterly records shall be kept on file for a period of at least five years and made available to the Department upon request. Any request for a change in the reporting frequency shall be submitted to the AQD District Supervisor for review and approval. **(R 336.1225, R 336.1702(a))**
3. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period calculations of VOC, benzene, and naphthalene emission rates for EU0033, as required by SC I.1, SC I.3, and SC I.4. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **(R 336.1225, R 336.1702(a))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

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. SV0033	4	53	R 336.1225

IX. OTHER REQUIREMENT(S)

NA

FLEXIBLE GROUP SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGG&TLOADING	Gasoline and transmix loading operations	EUGASLOADING, EUTRANSLOADING
FGGASOLINETKS	Gasoline holding tanks # 38, 39, 42, 44, 50, 51, and 67	EUTANK#38, EUTANK#39, EUTANK#42, EUTANK#44, EUTANK#50, EUTANK#51, EUTANK#67
FGDISTILLATETKS	Distillate holding tanks #43 and 49	EUTANK#43, EUTANK#49

**FGG&TLOADING
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Gasoline and transmix loading operations.

Emission Unit: EUGASLOADING, EUTRANSLOADING

POLLUTION CONTROL EQUIPMENT

A vapor recovery unit (VRU) operates as the primary pollution control equipment (PCE) for the loading rack. A vapor combustion unit (VCU) is utilized as the secondary PCE when the VRU is not operating due to, but not limited to, maintenance, testing, emergencies, etc.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. 1. VOC Vapor	0.167 pounds every 1,000 gallons of organic compound loaded (20 mg/L)	1-Hour Average	FGG&TLOADING	SC V.1, VI.4 through VI.8	R 336.1205, R 336.1225, R 336.1702(a), R 336.1706

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. 1. Gasoline and transmix	531.45 million gallons per year	12-month rolling time period as determined at the end of each calendar month	FGG&TLOADING	SC VI.1	R 336.1205, R 336.1225, R 336.1702(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not load any delivery vessel with an organic compound having a true vapor pressure greater than 1.5 psia or any delivery vessel that carried, as its previous load, an organic compound having a true vapor pressure greater than 1.5 psia unless all provisions of Rule 706 are met. The provisions of Rule 706 include, but are not limited to, filling the delivery vessel by a submerged fill pipe, and the following:
 - a) The delivery vessel shall be controlled by a vapor recovery system that captures all displaced organic vapor and air by means of a vapor tight collection line.
 - b) The delivery vessel shall be equipped maintained, or controlled with all of the following:
 - i) An interlocking system or procedure to ensure that the vapor-tight collection line is connected before any organic compound can be loaded.
 - ii) A device to ensure that the vapor-tight collection line shall close upon disconnection so as to prevent the release of organic vapor.
 - iii) 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.
 - iv) 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.
 - v) Hatch openings that are kept closed and vapor-tight during the loading of the delivery vessel.
 - c) The permittee shall develop written procedures for the operation of all control measures required by Rule 706 and shall post the procedures in an accessible, conspicuous location near the loading device.
- (R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1706, R 336.1910)**

2. The permittee shall not load any delivery vessel subject to control, as specified in SC III.1, unless all provisions of Rule 627 are met. The provisions of Rule 627 include, but are not limited to, the following:
 - a) There shall be no gas detector reading greater than or equal to 100 percent of the lower explosive limit at a distance of 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 Rule 2005.
 - b) 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.
 - c) 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 and to prevent vacuum from exceeding -0.2 pounds per square inch gauge.
 - d) Any delivery vessel or component of a vapor collection system that fails to meet any provision of this rule shall not be operated until the necessary repairs have been made, the vessel or collection system has been retested, and the test results have been submitted to the department.

(R 336.1205, R 336.1225, R 336.1627, R 336.1702(a), R 336.1910)

3. No later than 60 days after issuance of this permit, the permittee shall submit to the AQD District Supervisor, for review and approval, an updated malfunction abatement/preventative maintenance plan for FGG&TLOADING. After approval of the malfunction abatement/preventative maintenance plan by the AQD District Supervisor, the permittee shall not operate FGG&TLOADING unless the malfunction abatement/preventative maintenance plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. At a minimum Rule 911 requires the plan to include:
 - a) Identification of the equipment and all control equipment and the supervisory personnel responsible for overseeing the inspection, maintenance, and repair.
 - b) Description of the items or conditions to be inspected and frequency of the inspections or repairs.
 - c) Description of equipment and each add-on air pollution control device operating parameters that shall be monitored to detect a malfunction or failure, the normal operating range of the equipment and a description of the method of monitoring or surveillance procedures.
 - d) Identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - e) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If the malfunction abatement plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the malfunction abatement plan within 45 days after such an event occurs and submit the revised plan for approval to the AQD District Supervisor. Should the AQD determine the malfunction abatement/preventative maintenance plan to be inadequate, the District Supervisor may request modification of the plan to address those inadequacies. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1910, R 336.1911)**

4. The permittee shall only perform two (2) tanks cleanings per 12-month rolling time period. **(R 336.1205)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. Each pollution control equipment (PCE) shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack. **(40 CFR 63 Subpart BBBBBB, R 336.1910)**
2. The PCE shall be designed and operated to prevent gauge pressure in the delivery vessel from exceeding 0.6 pounds per square inch and to prevent vacuum from exceeding -0.2 pounds per square inch gauge. **(R 336.1627(8))**
3. A continuous monitoring system (CMS) shall be installed, calibrated, certified, operated, and maintained according to manufacturer's specifications whenever loading gasoline and/or transmix with the VRU. **(R 336.1205, 40 CFR 63.11092(b))**

4. Permittee shall not operate the product loading racks unless the pollution control equipment is installed and operating properly. Satisfactory operation includes maintaining and operating each control device in accordance with the malfunction abatement plan. **(R 336.1910(1)), R 336.1605(1)(b))**

V. TESTING/SAMPLING

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

1. The permittee shall verify the VOC emission rate from the PCE for FGG&TLOADING 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. The permittee is required to conduct a performance test on the vapor collection system with 180 days of issuance of this permit. **(R 336.1205, 40 CFR 63.11092(a)(3))**
2. The permittee shall conduct a performance test on the PCE in accordance with 40 CFR 60.503 except a reading of 500 parts per million (ppm) shall be used to determine the level of leaks to be repaired. **(40 CFR 63.11092(a))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep separate records of gasoline and transmix throughput in gallons monthly and on a 12-month rolling time period basis. **(R 336.1205)**
2. The permittee shall maintain a record of the results of the inspections performed as required R 336.1623 (8)(a) & (9)(b). **(R 336.1623(8)(c))**
3. The permittee shall maintain a record of the number of tank cleanings completed per 12-month rolling time period. **(R 336.1205)**

Vapor Collection System (Pollution Control Equipment)

4. There shall be no gas detector reading greater than or equal to 100% of the lower explosive limit at a distance 1 inch from the location of the potential leak in the PCE. Leaks shall be detected by a combustible gas detector using the test procedure described in R 336.2005. **(R 336.1627(6))**
5. 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(4))**
6. 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))**
7. The PCE shall be designed and operated to prevent gauge pressure in the delivery vessel from exceeding 0.6 pounds per square inch (18 inches of water) and to prevent vacuum from exceeding -0.2 pounds per square inch gauge (6.0 inches of water). **(R 336.1627(9))**
8. Any delivery vessel or component of a PCE 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))**
9. 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:
 - a) Minimize the gasoline spills
 - b) Clean up the spills as expeditiously as practicable
 - c) Cover all open gasoline containers with a gasketed seal when not in use
 - d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.**(R 336.1205, R 336.1901(a) & (b))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63 Subparts A and BBBBBB, as they apply to FGG&TLOADING.
(40 CFR 63 Subparts A & BBBBBB)

**FGGASOLINETKS
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Gasoline holding tanks # 38, 39, 42, 44, 50, 51, and 67

Emission Unit: EUTANK#38, EUTANK#39, EUTANK#42, EUTANK#44, EUTANK#50, EUTANK#51, EUTANK#67

POLLUTION CONTROL EQUIPMENT

Internal floating roof

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Gasoline and Ethanol	78,456,000 gallons/year	12-month rolling time period as determined at the end of each calendar month	EUTANK#42	SC VI.2, VI.3	40 CFR 60.110b, R 336.1205(1)(a) & (3)

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 EUTANK#42. The provisions of 40 CFR Part 60 Subpart Kb include, but are not limited to, equipping EUTANK#42 as follows: **(40 CFR Part 60 Subparts A & Kb, 40 CFR 63.11087)**
 - a) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. **(40 CFR 60.112b(a)(1)(i))**
 - b) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: **(40 CFR 60.112b(a)(1)(ii))**
 - i) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
 - ii) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
 - iii) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
 - c) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface. **(40 CFR 60.112b(a)(1)(iii))**

- d) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. **(40 CFR 60.112b(a)(1)(iv))**
- e) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. **(40 CFR 60.112b(a)(1)(v))**
- f) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. **(40 CFR 60.112b(a)(1)(vi))**
- g) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. **(40 CFR 60.112b(a)(1)(vii))**
- h) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. **(40 CFR 60.112b(a)(1)(viii))**
- i) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. **(40 CFR 60.112b(a)(1)(ix))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. After April 30, 1981, it is unlawful for a person to store any organic compound having a true vapor pressure of more than 1.5 psia, but less than 11 psia, at actual storage conditions in any existing fixed roof stationary vessel of more than 40,000-gallon capacity, unless the following condition is met:
 - 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 the vessel wall. The seal or any seal fabric shall not have visible holes, tears, or other nonfunctional openings. **(R 336.1604(1)(b))**
2. All openings, 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:
 - a) The cover, lid, or seal is in the closed position at all times, except when in actual use.
 - b) Automatic bleeder vents are closed at all times, except when the roof is floated off, or landed on, the roof leg supports.
 - c) 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 support. **(R 336.1604(2))**

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor and keep records of true vapor pressure (as defined in R336.1120(i)) of all organic compounds stored, in psia, at actual storage conditions. **(R 336.1205(1)(a) & (3))**
2. The permittee shall perform inspections and monitor operating information for EUTANK#42 in accordance with the federal Standards of Performance for New Stationary sources as specified in 40 CFR Part 60 Subparts A and Kb, as they apply to EUTANK#42. The provisions of 40 CFR Part 60 Subpart Kb include, but are not limited to, the following: **(40 CFR Part 60 Subparts A & Kb, 40 CFR 63.11087)**
 - a) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel. **(40 CFR 60.113b(a)(1))**
 - b) For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12-months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or

the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in 40 CFR 60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired, or the vessel will be emptied as soon as possible.

(40 CFR 60.113b(a)(2))

- c) For vessels equipped with a double-seal system as specified in 40 CFR 60.112b(a)(1)(ii)(B):
(40 CFR 60.113b(a)(3))

- i) Visually inspect the vessel as specified in 40 CFR 60.113b(a)(4) at least every five years; or
ii) Visually inspect the vessel as specified in 40 CFR 60.113b(a)(2).

- d) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than ten percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than ten years in the case of vessels conducting the annual visual inspection as specified in 40 CFR 60.113b(a)(2) and 40 CFR 60.113b(a)(3)(ii) and at intervals no greater than five years in the case of vessels specified in 40 CFR 60.113b(a)(3)(i). **(40 CFR 60.113b(a)(4))**

3. The permittee shall keep monthly records of throughput materials in gallons and annually on a 12-month rolling time period basis for EUTANK#42. **(R 336.1205(1)(a) & (3))**

4. The permittee shall keep readily accessible records that show the dimensions of EUTANK#42 and an analysis that shows the capacity of the storage vessel. The record shall be kept as long as the storage vessel remains in operation. **(40 CFR 60.110b, 40 CFR 60.111b)**

5. The permittee shall keep records of inspections and operating information for EUTANK#42 in accordance with the federal Standards of Performance for New Stationary sources as specified in 40 CFR Part 60 Subparts A and Kb, as they apply to EUTANK#42. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. The provisions of 40 CFR Part 60 Subpart Kb include, but are not limited to, the following: **(40 CFR Part 60 Subparts A & Kb, 40 CFR 63.11087)**

- a) Keep a record of each inspection performed as required by 40 CFR 60.113b(a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). **(40 CFR 60.115b(a)(2))**
- b) For each storage vessel as specified in 40 CFR 60.110b(a), keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. This record shall be kept for the life of the storage vessel. **(40 CFR 60.116b(b))**
- c) Except as provided in 40 CFR 60.116b(f) and (g), for each storage vessel either with a design capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa or with a design capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure greater than or equal to 15.0 kPa, the permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. **(40 CFR 60.116b(c))**

VII. REPORTING

1. The permittee shall submit reports for EUTANK#42 in accordance with the Federal Standards of Performance for New Stationary sources as specified in 40 CFR Part 60 Subparts A and Kb, as they apply to EUTANK#42. The provisions of 40 CFR Part 60 Subpart Kb include, but are not limited to, the following: **(40 CFR Part 60 Subparts A & Kb, 40 CFR 63.11087)**
- a) If the permittee installs an internal floating roof and, at initial startup, chooses to comply with 40 CFR part 65, subpart C, a report shall be furnished to the AQD District Supervisor stating that the

- control equipment meets the specifications of 40 CFR 65.43. This report shall be an attachment to the notification required by 40 CFR 65.5(b). **(40 CFR 60.110b(e)(3))**
- b) After installing the internal floating roof in accordance with 40 CFR 60.112b(a)(1), furnish the AQD District Supervisor with a report that describes the control equipment and certifies that the control equipment meets the specifications of 40 CFR 60.112b(a)(1) and 40 CFR 60.113b(a)(1). This report shall be an attachment to the notification required by 40 CFR 60.7(a)(3). **(40 CFR 60.115b(a)(1))**
 - c) If any of the conditions described in 40 CFR 60.113b(a)(2) are detected during the annual visual inspection required by 40 CFR 60.113b(a)(2), a report shall be furnished to the AQD District Supervisor within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made. **(40 CFR 60.115b(a)(3))**
 - d) After each inspection required by 40 CFR 60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR 60.113b(a)(3)(ii), a report shall be furnished to the AQD District Supervisor within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR 61.112b(a)(1) or 40 CFR 60.113b(a)(3) and list each repair made. **(40 CFR 60.115b(a)(4))**
2. The permittee shall submit notifications for EUTANK#42 in accordance with the federal Standards of Performance for New Stationary sources as specified in 40 CFR Part 60 Subparts A and Kb, as they apply to EUTANK#42. The provisions of 40 CFR Part 60 Subpart Kb include, but are not limited to, notifying the AQD District Supervisor in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by 40 CFR 60.113b(a)(1) and (a)(4) to afford the AQD District Supervisor the opportunity to have an observer present. If the inspection required by 40 CFR 60.113b(a)(4) is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Administrator at least seven days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator at least seven days prior to the refilling. **(40 CFR 60.113b(a)(5))**

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall not store any organic compound with a true vapor pressure (as defined in R 336.1120(i)) of 11 or more psia at actual storage conditions. **(R 336.1605)**
2. The permittee shall not equip any storage tank with an external floating roof. **(R 336.1623)**
3. The permittee shall comply with all applicable provisions of Rules 604 and 605. **(R 336.1604, R 336.1605)**

FGDISTILLATETKS FLEXIBLE GROUP CONDITIONS
--

DESCRIPTION

Distillate holding tanks #43 and 49

Emission Unit: EUTANK#43, EUTANK#49

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Permittee shall not store any organic compound with a true vapor pressure (as defined in R336.1120(i)) of more than 1.5 psia at actual storage conditions. **(R 336.1604(1))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall record and maintain record of the temperature of the stored product on a daily basis (alternative to true vapor pressure). The records should be made available to the Division upon request. **(R 336.1604(1), (R 336.1205(1)(a) & (3))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of Rule 604. **(R 336.1604)**

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

A vapor recovery unit (VRU) operates as the primary pollution control equipment (PCE) for the loading rack. A vapor combustion unit (VCU) is utilized as the secondary PCE when the VRU is not operating due to, but not limited to, maintenance, testing, emergencies, etc.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	95.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205, R 336.1225

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205, R 336.1225)**
2. The permittee shall keep, in a satisfactory manner, records of monthly and 12-month rolling time period VOC emission rate calculations for FGFACILITY. These calculations shall include all storage tanks, loading racks, and fugitive emissions, including fugitive emissions from equipment leaks and shall be based on product throughput rates, control device operation, and appropriate emission factors. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **(R 336.1205, R 336.1225)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities as specified in 40 CFR Part 63 Subparts A and BBBB, as they apply to each unit in FGFACILITY. **(40 CFR Part 63 Subparts A & BBBB)**

APPENDIX 1 Groundwater Remediation Emission Calculation and Recordkeeping

Source Name		Contact Person	
Location		County	
Recordkeeping Period		Permit Number	Pollutant(s)
Start Date	End Date		

Date	Water Flow (gal/min)	Concentration (ppm)			Control Efficiency (Percent)	VOC Emissions (lbs/hr)
		Inlet	Outlet	In - Out		
		EXAMPLE	100	210		

EQUATIONS TO CALCULATE EMISSIONS:

$$D = B - C, \text{ all units in parts per million (ppm)}$$

$$E \frac{\text{lbs}}{\text{hr}} = A \frac{\text{gal}}{\text{min}} \times 60 \frac{\text{min}}{\text{hr}} \times 8.34 \frac{\text{lbs}}{\text{gal}} \times D \times 10^{-6} \times \frac{(100 - F)}{100}$$

Signature: _____

Date: _____

Telephone Number: _____