

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

EFFECTIVE DATE: November 16, 2020

ISSUED TO

BUCKEYE TERMINALS, LLC - DETROIT TERMINAL

State Registration Number (SRN): B2247

LOCATED AT

700 South Deacon Street, Detroit, Wayne County, Michigan 48217

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B2247-2020

Expiration Date: November 16, 2025

Administratively Complete ROP Renewal Application Due Between
May 16, 2024 and May 16, 2025

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Rule 210(1) of the administrative rules promulgated under Act 451, this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-B2247-2020

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(1) of Act 451. Pursuant to Rule 214a of the administrative rules promulgated under Act 451, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environment, Great Lakes, and Energy

April Wendling, Detroit District Supervisor

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AUTHORITY AND ENFORCEABILITY

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Environment, Great Lakes, and Energy (EGLE) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a Source-Wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements are identified for each ROP term or condition. All terms and conditions that are included in a PTI are streamlined, subsumed and/or is state-only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**
- Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R 336.1214a(5))**
- Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA. **(R 336.1213(1)(a))**
2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. **(R 336.1213(1)(b))**
3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. **(R 336.1213(1)(c))**
4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities: **(R 336.1213(1)(d))**
 - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
 - c. Inspect, at reasonable times, any of the following:
 - i. Any stationary source.
 - ii. Any emission unit.
 - iii. Any equipment, including monitoring and air pollution control equipment.
 - iv. Any work practices or operations regulated or required under the ROP.
 - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**
7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**
8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

Equipment & Design

9. Any 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).² **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

11. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in Subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following:"² **(R 336.1301(1))**
 - a. A 6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27% opacity.
 - b. A limit specified by an applicable federal new source performance standard.

The grading of visible emissions shall be determined in accordance with Rule 303.

12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
 - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.¹ **(R 336.1901(a))**
 - b. Unreasonable interference with the comfortable enjoyment of life and property.¹ **(R 336.1901(b))**

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).² **(R 336.2001)**
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(5))**

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate. **(R 336.1213(3)(b))**
 - a. The date, location, time, and method of sampling or measurements.
 - b. The dates the analyses of the samples were performed.
 - c. The company or entity that performed the analyses of the samples.
 - d. The analytical techniques or methods used.
 - e. The results of the analyses.
 - f. The related process operating conditions or parameters that existed at the time of sampling or measurement.
17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604-3507. **(R 336.1213(4)(c))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
 - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following: **(R 336.1213(3)(c))**
 - a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
 - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that; “based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete.” The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. 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 appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor 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 conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.² **(R 336.1912)**

Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
 - a. The applicable requirements are included and are specifically identified in the ROP.
 - b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.

Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.

27. Nothing in this ROP shall alter or affect any of the following:
 - a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
 - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
 - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

- d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**
28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
 - a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
 - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
 - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
 - d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
 - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**
31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**
32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(10))**
33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

Reopenings

34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
 - a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. **(R 336.1217(2)(a)(i))**
 - b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. **(R 336.1217(2)(a)(ii))**
 - c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. **(R 336.1217(2)(a)(iii))**
 - d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. **(R 336.1217(2)(a)(iv))**

Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(9))**

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.
37. If the permittee is subject to 40 CFR Part 82 and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 68.10(a):
- June 21, 1999,
 - Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
 - The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR Part 68)**

Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. **(R 336.1213(12))**

Permit to Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² **(R 336.1201(1))**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² **(R 336.1201(8), Section 5510 of Act 451)**
45. The terms and conditions of a PTI 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 the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI 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. The written request shall be sent to the appropriate AQD District Supervisor, EGLE.² **(R 336.1219)**
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, EGLE, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² **(R 336.1201(4))**

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

B. SOURCE-WIDE CONDITIONS

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.

C. EMISSION UNIT SPECIAL CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

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
EUTANK#5	3,427,200-gallon premium gasoline storage tank with internal floating roof	1934	FGGASTANKS, FGMACT6B
EUTANK#6	3,385,200-gallon gasoline storage tank with internal floating roof	1920	FGGASTANKS, FGMACT6B
EUTANK#7	1,050,000-gallon transmix storage tank with internal floating roof	1948	FGGASTANKS, FGMACT6B
EUTANK#8	1,050,000-gallon ethanol (5% gasoline) with internal floating roof	1948	FGGASTANKS, FGMACT6B
EUTANK#9	2,352,000-gallon gasoline or diesel internal floating roof storage tank. Plant ID tank No. 9	1948, 2000	FGGASTANKS, FGMACT6B
EUTANK#10	4,561,200-gallon gasoline internal floating roof storage tank.	1954	FGGASTANKS, FGMACT6B
EUTANK#11	4,609,920-gallon gasoline storage tank with internal floating roof	1954	FGGASTANKS, FGMACT6B
EUTANK#12	4,905,600-gallon diesel, gasoline, or jet internal floating roof storage tank. Plant ID tank No. 12	1955	FGGASTANKS, FGMACT6B
EUTANK#16	54,600-gallon pressurized butane storage tank	2000	FGRULE290
EULODING	Loading rack containing four loading bays for gasoline and distillate equipped with a vapor recovery unit system or vapor combustion unit.	1934, 2015	FGMACT6B
EUAIRSTRIPPER	Air stripper for treatment of run-off water	1994, 1995	NA

EUTANK#9
EMISSION UNIT CONDITIONS

DESCRIPTION

2,352,000-gallon gasoline or diesel internal floating roof storage tank. Plant ID tank No. 9.

Flexible Group ID: FGGASTANKS and FGMACT6B

POLLUTION CONTROL EQUIPMENT

Floating roof and seals

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	6.2 tons per year. ²	Based on a 12-month rolling time period as determined at the end of each calendar month. ²	EUTANK#9	SC VI.1	R 336.1702

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Gasoline	100,000,000 gallons per year. ²	Based on a 12-month rolling time period as determined at the end of each calendar month. ²	EUTANK#9	SC VI.1	R 336.1702
2. Distillate	212,284,800 gallons per year. ²	Based on a 12-month rolling time period as determined at the end of each calendar month. ²	EUTANK#9	SC VI.1	R 336.1702

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA - Refer to FGGASTANKS and FGMACT6B

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall keep monthly records of throughput materials in gallons and annually on a 12-month rolling time period basis. **R 336.1213(3)**
2. The permittee shall keep, in a satisfactory manner, records of monthly and 12-month rolling time period VOC emission rate calculations for EUTANK#9. **R 336.1213(3)**
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 336.1213(3)**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUTANK#12
 EMISSION UNIT CONDITIONS**

DESCRIPTION

4,905,600-gallon diesel, gasoline, or jet internal floating roof storage tank. Plant ID tank No. 12.

Flexible Group ID: FGGASTANKS and FGMACT6B

POLLUTION CONTROL EQUIPMENT

Internal floating roof

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	11.6 tons per year. ²	Based on a 12-month rolling time period as determined at the end of each calendar month. ²	EUTANK# 12	SC VI.1 SC VI.2 SC VI.3	R 336.1702(c)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Gasoline, Diesel, or Jet fuel	163,000,000 gallons per year. ²	Based on a 12-month rolling time period as determined at the end of each calendar month. ²	EUTANK#12	SC VI.1 SC VI.2	R 336.1702(c)

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA - Refer to FGGASTANKS and FGMACT6B

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall keep monthly records of throughput materials in gallons and annually on a 12-month rolling time period basis. (R 336.1213(3))
2. The permittee shall keep, in a satisfactory manner, records of monthly and 12-month rolling time period VOC emission rate calculations for EUTANK#12. (R 336.1213(3))

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 336.1213(3))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD's District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD's District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EULODING
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Loading rack containing four bays for loading gasoline and diesel fuel.

Flexible Group ID: FGMACT6B

POLLUTION CONTROL EQUIPMENT

Vapor recovery unit (VRU) using carbon adsorption or portable vapor combustion unit (VCU)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	0.7 pounds per 1000 gallons of gasoline loaded ²	6-hour period as specified within the test methods and procedures at 40 CFR 60.503	EULODING	SC V.1, SC V.2, SC VI.1, SC VI.2, SC VI.6, SC VI.7	R 336.1609(2)
2. VOC	35 mg/liter of gasoline loaded ²	6-hour period as specified within the test methods and procedures at 40 CFR 60.503	EULODING	SC V.1, SC V.2, SC V.3 SC VI.1, SC VI.2, SC VI.6, SC VI.7	40 CFR 60.502(b), 40 CFR 63.11088(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not 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 filled by a submerged fill pipe.² **(R336.1609(1))**
2. Any delivery vessel located at the gasoline loading rack shall be controlled by a vapor recovery system that captures all displaced organic vapor and air by means of a vapor-tight collection line and recovers or combusts the organic vapors such that emissions to the atmosphere do not exceed 0.7 pounds of organic vapor per 1000 gallons of organic compounds loaded.² **(R336.1609(2))**
3. Any delivery vessel located at a gasoline loading rack shall be equipped, maintained, or controlled with all of the following:²
 - 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. **(R336.1609(3))**
4. A person who is responsible for the operation of all control measures required by this rule 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.² **(R336.1609(4))**
 5. The vapor recovery unit (VRU) or portable vapor combustion unit (VCU) shall be installed, maintained, and operated in a satisfactory manner.² **(R 336.1225, R 336.1910)**
 6. Loading of gasoline or transmix is not allowed unless the emissions are being controlled by the VRU or VCU. The permittee shall control the emissions from the terminal loading rack with a temporary VCU during all periods of loading gasoline or transmix when the VRU is offline. **(R 336.1213(2))**
 7. The vapor collection system shall not be operated unless all of the provisions of the following are met:
 - a. There shall be no gas detector reading greater than or equal to 100% of the lower explosive limit at a distance of 1 inch from the location of the potential leak in the vapor collection system. **(R336.1627(7))**
 - 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. **(R336.1627(8))**
 - 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. **(R336.1627(9))**
 - d. Any delivery vessel or component of a vapor collection system that fails to meet any provision of Rule 627 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 AQD. **(R336.1627(10))**
 8. 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 336.1213(2))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 450 mm of water during product loading. This level is not to be exceeded when measured by the procedures specified in 40 CFR 60.503(d).² **(40 CFR 60.502(h))**
2. 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.² **(40 CFR 60.502(i))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. 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 total organic compound liquid or vapor leaks. For the purpose of this inspection, detection methods such as sight, sound or smell are acceptable. Records of the inspection shall be kept and maintained in accordance with EULODGING SC VI.1 through SC VI.5.² **(40 CFR 60.502(j))**
2. Verification of VOC emission rates from EULODGING by testing at owner's expense in accordance with the EPA Reference Test Method 25A or EPA Reference Test Method 25B will be required at AQD Supervisor's request.

Stack testing procedures and location of stack testing ports shall be in accordance with the applicable federal Reference Methods, 40 CFR Part 60 Appendix A. No less than 30 days prior to testing, a complete stack test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of the complete test results to the AQD within 60 days following the last date of the test.² **(R 336.2004(1)(u), 40 CFR 60.503)**

3. Each owner or operator of a bulk gasoline terminal subject to the emission standard in item 1(b) of Table 2 to Subpart BBBBBB must comply with the requirements in paragraphs (a) through (d) of §63.11092.² **(40 CFR 63.11092(a))**
4. If the permittee is operating EULODGING in compliance with an enforceable state permit that requires the loading rack to meet an emission limit of 80 milligrams (mg), or less, per liter of gasoline loaded (mg/l), the permittee may submit a statement by a responsible official certifying the compliance status of EULODGING in lieu of the test required under paragraph (a)(1) of §63.11092.² **(40 CFR 63.11092(a)(2))**

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. Records of VRU operations shall be kept for all times that gasoline is loaded. The records shall be made available to AQD upon request.² **(R336.1609(2))**
2. On a quarterly basis, the permittee shall verify compliance with R 336.1609(3).² **(R336.1609(3))**
3. The permittee shall record each detection of a leak and the source of the leak shall be repaired as soon as practicable, but no later than fifteen calendar days after the leak is detected.² **(40 CFR 60.502(j))**
4. The permittee shall keep a record of each monthly leak inspection record required under 40 CFR 60.502(j). The leak inspection records shall include, as a minimum, the following information:² **(40 CFR 60.505(c))**
 - a. Date of inspection **(40 CFR 60.505(c)(1))**
 - b. Findings: (may indicate no leaks discovered; or location, nature, and severity of each leak) **(40 CCFR 60.505(c)(2))**
 - c. Leak Determination Method **(40 CFR 60.505(c)(3))**
 - d. Corrective action (date each leak repaired, reasons for any repair interval in excess of 15 days) **(40 CFR 60.505 (c)(4))**
 - e. Inspector name and signature **(40 CFR 60.505(5))**
5. The permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system.² **(40 CFR 60.505(f))**
6. The permittee shall install, calibrate, certify, operate, and maintain, according to the manufacturer's specifications, a continuous monitoring system (CMS) while gasoline vapors are displaced to the vapor processor systems, as specified in paragraphs (b)(1) through (5) of §63.11092.² **(40 CFR 63.11092 (b))**
7. The permittee shall install and maintain a continuous emissions monitoring system (CEMS) capable of measuring the organic compound concentration in the exhaust air stream of the VRU. The CEMS shall meet applicable performance specifications in 40 CFR 60, Subpart A, Appendix B. **(40 CFR 63.11092(b)(1)), (40 CFR, Part 63, Subpart BBBBBB, Table 3))**
8. For each performance test conducted under paragraph (a)(1) of §63.11092, the permittee shall determine a monitored operating parameter value for the vapor processing system using the procedures specified in paragraphs (b)(1)(i) through (iv) of §63.11092. During the performance test, continuously record the operating parameter as specified under paragraphs (b)(1)(i) through (iv) of §63.11092.² **(40 CFR 63.11092 (b)(1))**

- a. Where a carbon adsorption vapor recovery unit (VRU) is used, the owner or operator shall monitor the operation of the system as specified below:²
 - i. A continuous emissions monitoring system (CEMS) capable of measuring organic compound concentration shall be installed in the exhaust air stream; or
 - ii. The permittee may choose to meet the requirements listed in paragraph (b)(1)(i)(B)(1) and (2) of §63.11092. **(40 CFR 63.11092 (b)(1)(i))**
 - b. Where a thermal oxidation system other than a flare is used, the permittee shall monitor the operation of the system as specified below:²
 - i. A continuous parameter monitoring system (CPMS) capable of measuring temperature shall be installed in the firebox or in the ductwork immediately downstream from the firebox in a position before any substantial heat exchange occurs; or
 - ii. The permittee may choose to meet the requirements listed in paragraphs (b)(1)(iii)(B)(1) and (2) of §63.11092. **(40 CFR 63.11092 (b)(1)(iii))**
9. Where a VCU is used, the permittee shall continuously monitor the presence of a thermal oxidation system pilot flame using a heat-sensing device, such as an ultraviolet beam sensor or a thermocouple, installed in proximity of the pilot light, to indicate the presence of a flame. The heat-sensing device shall send a positive parameter value to indicate that the pilot flame is on, or a negative parameter value to indicate that the pilot flame is off. **(40 CFR 63.11092(b)(1)(iii)(B)(1), (40 CFR 64.6(c)(1)(i) and (ii))**
10. For the VCU, the permittee shall develop and submit to the Administrator and AQD District Supervisor a Monitoring and Inspection Plan that describes the owner or operator's approach for meeting the requirements below:
- a. The thermal oxidation system shall be equipped to automatically prevent gasoline loading operations from beginning at any time that the pilot flame is absent.
 - b. The owner or operator shall verify, during each day of operation of the loading rack, the proper operation of the assist-air blower and the vapor line valve. Verification shall be through visual observation, or through an automated alarm or shutdown system that monitors system operation. A manual or electronic record of the start and end of a shutdown event may be used.
 - c. The owner or operator shall perform semi-annual preventive maintenance inspections of the thermal oxidation system, including the automated alarm or shutdown system for those units so equipped, according to the recommendations of the manufacturer of the system.
 - d. The monitoring plan developed under SC VI.10 shall specify conditions that would be considered malfunctions of the thermal oxidation system during the inspections or automated monitoring performed under SC VI.10b and SC VI.10c, describe specific corrective actions that will be taken to correct any malfunction, and define what the owner or operator would consider to be a timely repair for each potential malfunction.
 - e. The owner or operator shall document any system malfunction, as defined in the monitoring and inspection plan, and any activation of the automated alarm or shutdown system with a written entry into a log book or other permanent form of record. Such record shall also include a description of the corrective action taken and whether such corrective actions were taken in a timely manner, as defined in the monitoring and inspection plan, as well as an estimate of the amount of gasoline loaded during the period of the malfunction. **(40 CFR 63.11092(b)(1)(iii)(B)(2), 40 CFR 64.6(c)(1)(i) and (ii), 40 CFR 64.7(e))**
11. An excursion is defined as a failure for the pilot detector to shut down the EULODGING when there is no flame. **(40 CFR 64.6(c)(2))**
12. Upon detecting an excursion or exceedance when using a VCU, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). See Monitoring and Inspection Plan for corrective actions. **(40 CFR 64.7(d))**

13. When using a VCU, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c))**
14. When using a VCU, the permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment. **(40 CFR 64.7(b))**
15. When using a VCU, the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR 64.9(b)(1))**
16. When using the VRU, in the event of CEMS downtime, the permittee shall meet the requirements listed in 40 CFR 63.11092(b)(1)(i)(B)(1) and (2). **(40 CFR 63.11092 (b)(1)(i)).**

See Appendix 3

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken when using a VCU. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. **(40 CFR 64.9(a)(2)(i))**
5. Each semiannual report of monitoring and deviations shall include summary information on monitor downtime for the flame sensor when using a VCU. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii))**
6. The permittee shall notify the AQD District Supervisor, within 15 days of each of the following events: each time the temporary VCU is brought on site; the date of startup of the temporary VCU; and each time the temporary VCU is removed from the site.² **(R336.201(3))**
7. The permittee shall submit reports for EULODGING in accordance with the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63 Subparts A and BBBB, as they apply to EULODGING.² **(40 CFR Part 63, Subparts A and BBBB)**

See Appendix 8

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. SVVCU	96 ²	13 ²	R 336.1225, 40 CFR 52.21(c) and (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subpart A and Subpart XX.² **(40 CFR Part 60 Subparts A & XX)**
2. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and BBBB, for Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities.² **(40 CFR 63 Subparts A and BBBB)**
3. When using the VCU, the permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**
4. When using the VCU, if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the ROP and CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. **(40 CFR 64.7(e))**

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUAIRSTRIPPER
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Air stripper for run-off water

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	0.52 lb per hour average ²	Calendar Month	EUAIRSTRIPPER	SC V.1, SC VI.3	R 336.1702(a)
2. Benzene	0.02 lb per hour average ¹	Calendar Month	EUAIRSTRIPPER	SC V.1, SC VI.3	R 336.1225

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
2. Flow rate of water to stripper	168 gallons per hour ²	Calendar Month	EUAIRSTRIPPER	SC VI.1	R 336.1225, R 336.1702(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- On a quarterly basis, the permittee shall determine, in a manner satisfactory to the AQD Detroit District Supervisor the total VOC concentration and benzene concentration of the air stripper influent and effluent water streams. Quarterly total VOC and benzene concentration determinations must be completed, for each calendar quarter during which EUAIRSTRIPPER was operational, not more than 120 calendar days from the previous quarterly determinations. Total VOC concentration and benzene concentration shall be determined using standard EPA analytical methods. Any request for a change in the sampling frequency shall be submitted to the AQD Detroit District Supervisor for review and approval.² (R 336.1225, R 336.1702(a))
- Upon request from the AQD Detroit District Supervisor, the permittee shall provide verification of VOC and benzene emission rates from EUAIRSTRIPPER, by testing at owner's expense, in accordance with Department requirements. No less than 30 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of

a complete report of the test results to the AQD within 60 days following the last test date of the test.² **(R 336.1225, R 336.1702(a), R 336.2001(1)(c), R 336.201(3) and (5))**

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall monitor and record the influent water flowrate to EUAIRSTRIPPER in a manner satisfactory to the AQD District Supervisor. This shall be done not less than once per calendar month.² **(R 336.1225, R 336.1702(a))**
2. The permittee shall keep, in a satisfactory manner, a record of each total VOC concentration and benzene concentration determination from EUAIRSTRIPPER.² **(R 336.1225, R 336.1702(a))**
3. The permittee shall maintain calculations and records of the following information for EUAIRSTRIPPER, on a calendar month basis, and using methods acceptable to the AQD District Supervisor:²
 - a. The hourly average influent water flowrate to EUAIRSTRIPPER;
 - b. The hourly average VOC emission rate and hourly average benzene emission rate. **(R 336.1225, R 336.1702(a))**
4. 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.² **(R 336.1225, R 336.1702(a))**

See Appendix 7

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

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. SV007	28.5 ¹	6 ¹	R 336.1225

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

D. FLEXIBLE GROUP SPECIAL CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

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
FGGASTANKS	Storage tanks subject to Rule 604	EUTANK#5, EUTANK#6 EUTANK#7, EUTANK#8 EUTANK#9, EUTANK#10 EUTANK#11, EUTANK#12
FGMACT6B	Area source gasoline distribution bulk terminal with gasoline storage tanks and gasoline loading rack subject to 40 CFR Subpart BBBB.	EUTANK#5, EUTANK#6 EUTANK#7, EUTANK#8 EUTANK#9, EUTANK#10 EUTANK#11, EUTANK#12 EULOADRACK
FGRULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.	EUTANK#16

FGGASTANKS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Storage tanks subject to Rule 604

Emission Unit: EUTANK#5, EUTANK#6, EUTANK#7, EUTANK#8, EUTANK#9, EUTANK#10, EUTANK#11, EUTANK#12

POLLUTION CONTROL EQUIPMENT

Internal floating roofs

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(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 shall be equipped with covers, lids or seals such that 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 leg supports. **(R336.1604(2))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. For each storage tank, 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 336.1213(3)**

2. For each storage tank, the permittee shall 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 on an annual basis. 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 permittee shall repair the items or empty and remove the storage vessel from service within 45 days. **R 336.1213(3)**
3. The permittee shall keep a record of each inspection performed. Each record shall identify the following:
 - a. Inspection date
 - b. Tank Number
 - c. Product stored
 - d. Any visible tears, holes or other nonfunction opening in the roof seals or seal fabric?
 - e. Is the internal floating roof resting on the surface of the VOL inside the storage vessel?
 - f. Any product or liquid accumulated on top of floating roof?
 - g. The nature of the defects, and the date the storage tank was emptied or the nature of and date the repair was made. **R 336.1213(3)**

See Appendix 3

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

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 336.1604)**
2. The permittee shall not equip any storage tank with an external floating roof. **(R 336.1213(3))**
3. The permittee shall comply with all applicable provisions of Rules 604. **(R 336.1604)**

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGMACT6B FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Area source gasoline distribution bulk terminal with gasoline storage tanks and gasoline loading rack subject to 40 CFR Subpart BBBB.

Emission Unit: EUTANK#5, EUTANK#6, EUTANK#7, EUTANK#8, EUTANK#9, EUTANK#10, EUTANK#11, EUTANK#12, EULOADRACK

POLLUTION CONTROL EQUIPMENT

Floating roofs, vapor recovery unit and temporary vapor combustion unit

I. EMISSION LIMIT(S)

NA - Refer to EUTANK#9, EUTANK#12 and EULOADRACK in Part C of this document

II. MATERIAL LIMIT(S)

NA - Refer to EUTANK#9 and EUTANK#12 in Part C of this document

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip each gasoline storage tank in FGMACT6B according to the requirements of 40 CFR 60.112b as follows: **(40 CFR 63.11087(a))**
 - a. Equip each internal floating roof gasoline storage tank according to the requirements in §60.112b(a)(1) except for the secondary seal requirements under §60.112b(a)(1)(ii)(B) and the requirements in §60.112b(a)(1)(iv) through (ix).
 - b. Equip each external floating roof gasoline storage tank according to the requirements in §60.112b(a)(2) except that the requirements of §60.112b(a)(2)(ii) shall only be required if such storage tank does not currently meet the requirements of §60.112b(a)(2)(i); or
 - c. Equip and operate each internal and external floating roof gasoline storage tank according to the applicable requirements in §63.1063(a)(1) and (b), except for the secondary seal requirements under §63.1063(a)(1)(i)(C) and (D), and equip each external floating roof gasoline storage tank according to the requirements of §63.1063(a)(2) if such storage tank does not currently meet the requirements of §63.1063(a)(1).
2. If a gasoline tank is subject to, and complies with, the control requirements of 40 CFR Part 60, Subpart Kb, the storage tank will be deemed in compliance with §63.11087. The permittee shall report this determination in the Notification of Compliance Status report under §63.11093(b). **(40 CFR 63.11087(f))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA - Refer to EULOADRACK in Part C of this document

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall perform a monthly leak inspection of all equipment in gasoline service, as defined in §63.11100. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. **(40 CFR 63.11089 (a))**
2. A log book shall be used and shall be signed by the owner or operator at the completion of each inspection. A section of the log shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility. **(40 CFR 63.11089 (b))**
3. Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak, except as provided in SC VI.4 below. **(40 CFR 63.11089 (c))**
4. Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The owner or operator shall provide in the semiannual report specified in §63.11095(b), the reason(s) why the repair was not feasible and the date each repair was completed. **(40 CFR 63.11089 (d))**
5. Each owner or operator of an affected source subject to equipment leak inspections under §63.11089 shall record in the log book for each leak that is detected the information specified in paragraphs a through g below: **(40 CFR 63.11094 (e))**
 - The equipment type and identification number;
 - a. The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell);
 - b. The date the leak was detected and the date of each attempt to repair the leak;
 - c. Repair methods applied in each attempt to repair the leak;
 - d. "Repair delayed" and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak;
 - e. The expected date of successful repair of the leak if the leak is not repaired within 15 days; and
 - f. The date of successful repair of the leak.

See Appendix 3

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall submit reports for FG-MACT6B in accordance with the National Emission Standards for Hazardous Air Pollutants (NESHAP) as specified in 40 CFR Part 63 Subparts A and BBBB, as they apply to FGMACT6B. **(40 CFR Part 63, Subparts A and BBBB)**
5. The permittee shall include in a semiannual report to the Administrator, the number of equipment leaks not repaired within 15 days after detection. **(40 CFR 63.11095(a)(3))**
6. For each occurrence of an equipment leak for which no repair attempt was made within 5 days or for which repair was not completed within 15 days after detection: **(40 CFR 63.11095(b)(5))**
 - a. The date on which the leak was detected;
 - b. The date of each attempt to repair the leak;
 - c. The reasons for the delay of repair; and

- d. The date of successful repair.
7. Each owner or operator of a bulk gasoline plant shall submit a semiannual excess emissions report, including the information specified in SC VII.5 and SC VII.6, only for a 6-month period during which an excess emission event has occurred. If no excess emission events have occurred during the previous 6-month period, no report is required. **(40 CFR 63.11095(c))**
8. Permittee shall operate the facility such that none of the facility parameters used to calculate the result under 40 CFR 63.420(a)(1) is exceeded in any rolling 30-day period such as to cause the value E_T to be greater than 1.0. **(40 CFR 63.420(c)(1))**
9. The permittee shall document the methods, procedures, and assumptions supporting the calculations for determining the criteria in 40 CFR 63.420(c). **(40 CFR 63.428(i)(1))**
10. Permittee shall maintain records to document that the facility parameters established under 40 CFR 63.420(c) have not been exceeded. **(40 CFR 63.428(i)(2))**
11. Permittee shall report annually to the AQD District Supervisor that the facility parameters established under 40 CFR 63.420(c) have not been exceeded. **(40 CFR 63.428(i)(3))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA - Refer to EULOADRACK in Part C of this document

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and BBBBBB, for Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities. **(40 CFR 63 Subparts A and BBBBBB)**
2. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and R, for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations). **(40 CFR 63 Subparts A and R)**

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGRULE290 FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.

Emission Units installed on or after December 20, 2016: Any future emission unit that meets the requirements of this flexible group.

Emission Units installed prior to December 20, 2016: EUTANK#16

POLLUTION CONTROL EQUIPMENT

Pressurized horizontal tank for EUTANK#16

I. EMISSION LIMIT(S)

1. Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. **(R 336.1290(2)(a)(i))**
2. Any emission unit for which CO₂ equivalent emissions are not more than 6,250 tons per month and for which the total uncontrolled or controlled emissions of all other air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: **(R 336.1290(2)(a)(ii))**
 - a. For toxic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 micrograms per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(2)(a)(ii)(A))**
 - b. For toxic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(2)(a)(ii)(B))**
 - c. The emission unit shall not emit any toxic air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. **(R 336.1290(2)(a)(ii)(C))**
 - d. For total mercury, the uncontrolled or controlled emissions shall not exceed 0.01 pounds per month from emission units installed on or after December 20, 2016. **(R 336.1290(2)(a)(ii)(D))**
 - e. For lead, the uncontrolled or controlled emissions shall not exceed 16.7 pounds per month from emission units installed on or after December 20, 2016. **(R 336.1290(2)(a)(ii)(E))**
3. Any emission unit that emits only particulate air contaminants without initial risk screening levels and other air contaminants that are exempted under Rule 290(2)(a)(i) or Rule 290(2)(a)(ii), if all the following provisions are met: **(R 336.1290(2)(a)(iii))**
 - a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have exhaust gas flow rate more than 30,000 actual cubic feet per minute. **(R 336.1290(2)(a)(iii)(A))**
 - b. The visible emissions from the emission unit are not more than 5% opacity in accordance with the methods contained in Rule 303. **(R 336.1290(2)(a)(iii)(B))**

- c. The initial threshold screening level for each particulate toxic air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(2)(a)(iii)(C))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. **(R 336.1290)**
2. The following requirements apply to emission units installed on or after December 20, 2016, utilizing control equipment:
 - a. An air cleaning device for volatile organic compounds shall be installed, maintained, and operated in accordance with the manufacturer's specifications. Examples include the following: **(R 336.1290(2)(b)(i), R 336.1910)**
 - i. Oxidizers and condensers equipped with a continuously displayed temperature indication device.
 - ii. Wet scrubbers equipped with a liquid flow rate monitor.
 - iii. Dual stage carbon absorption where the first canister is monitored for breakthrough and replaced if breakthrough is detected.
 - b. An air cleaning device for particulate matter shall be installed, maintained, and operated in accordance with the manufacturer's specifications or the permittee shall develop a plan that provides to the extent practicable for the maintenance and operation of the equipment in the manner consistent with good air pollution control practices for minimizing emissions. It shall also be equipped to monitor appropriate indicators of performance, for example, static pressure drop, water pressure, and water flow rate. **(R 336.1290(2)(b)(ii), R 336.1910)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the EGLE, AQD Rule 290; Permit to Install Exemption Record form (EQP 3558) or in a format that is acceptable to the AQD District Supervisor. **(R 336.1213(3))**
 - a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**
 - b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**
 - c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**
 - d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(2)(a)(ii) and (iii). **(R 336.1213(3))**
 - e. Records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. Volatile organic compound emissions from units installed on or after December 20, 2016, shall be calculated using mass balance, generally accepted engineering calculations, or another method acceptable to the AQD District Supervisor. **(R 336.1213(3), R 336.1290(2)(d))**
 - f. Records are maintained on file for the most recent 2-year period and are made available to the department upon request. **(R 336.1213(3), R 336.1290(2)(e))**

2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. **(R 336.1213(3))**
 - a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(2)(c), R 336.1213(3))**
 - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. **(R 336.1213(3))**
3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. **(R 336.1213(3))**

See Appendix 4

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

APPENDICES

Appendix 1. Acronyms and Abbreviations

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
Department/ department	Michigan Department of Environment, Great Lakes, and Energy	gr	Grains
EGLE	Michigan Department of Environment, Great Lakes, and Energy	HAP	Hazardous Air Pollutant
EU	Emission Unit	Hg	Mercury
FG	Flexible Group	hr	Hour
GACS	Gallons of Applied Coating Solids	HP	Horsepower
GC	General Condition	H ₂ S	Hydrogen Sulfide
GHGs	Greenhouse Gases	kW	Kilowatt
HVLP	High Volume Low Pressure*	lb	Pound
ID	Identification	m	Meter
IRSL	Initial Risk Screening Level	mg	Milligram
ITSL	Initial Threshold Screening Level	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	NMOC	Non-methane Organic Compounds
MAP	Malfunction Abatement Plan	NO _x	Oxides of Nitrogen
MSDS	Material Safety Data Sheet	ng	Nanogram
NA	Not Applicable	PM	Particulate Matter
NAAQS	National Ambient Air Quality Standards	PM10	Particulate Matter equal to or less than 10 microns in diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	%	Percent
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

Appendix 2. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. (R 336.1213(4)(a), R 336.1119(a)(ii))

Appendix 3. Monitoring Requirements

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 4. Recordkeeping

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 5. Testing Procedures

Specific testing requirement plans, procedures, and averaging times are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B2247-2009. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-B2247-2009 is being reissued as Source-Wide PTI No. MI-PTI-B2247-2020.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
149-15	NA	Addition of temporary vapor combustion unit to use when the VRU is offline	EULODGING
200-16	NA	Modified the testing and monitoring requirements	EUAIRSTRIPPER

Appendix 7. Emission Calculations

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in EUAIRSTRIPPER. Alternative calculations must be approved by the AQD Detroit District Supervisor.

1. Applicant shall use the following method of calculation to determine VOC emissions and Benzene emissions:

$$E = F_s (C_i - C_0) * \text{Conv}$$

Where:

E = Emission rate from stripper, pounds per hour of VOCs or Benzene

F_s = Flow rate of liquid feed to stripper, pounds per hour.

F_s is calculated as follows:

Difference in the totalizer readings between the first day of the calendar month and the last day of the calendar month (in gallons) divided by the number of hours between readings.

$$F_s = (\text{Totalizer Difference} / \text{Total Hours})$$

C_i = Concentration of VOCs or benzene in liquid feed to stripper, (µg / L)

C₀ = Concentration of VOCs or benzene in liquid effluent from stripper, (µg / L)

Conv = Unit conversion factor (3.785 L /gallon) * (1 pounds / 454,000,000 µg)

NOTE:

The emission rates (E) from EUAIRSTRIPPER shall be calculated each calendar month. The concentration of VOCs and benzene are obtained from analytical results of sampling conducted on a quarterly basis. Monthly emissions calculations shall use analytical results obtained from the calendar quarter encompassing the same calendar month.

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use EGLE, AQD, Report Certification form (EQP 5736) and EGLE, AQD, Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

B. Other Reporting

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.