

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

EFFECTIVE DATE: MARCH 1, 2016

ISSUED TO

BUCKEYE TERMINAL, LLC

State Registration Number (SRN): B2987

LOCATED AT

205 Marion Ave, River Rouge, Michigan 48218

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B2987-2016

Expiration Date: March 1, 2021

Administratively Complete ROP Renewal Application Due Between
September 1, 2019 and September 1, 2020

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 Michigan Air Pollution Control Rule 210(1), 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-B2987-2016

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, 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 Environmental Quality

Wilhemina McLemore, 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 Environmental Quality (MDEQ) 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 are 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 percent 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 states 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. **(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(8))**

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 Part 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, MDEQ.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, MDEQ, 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.

SOURCE-WIDE CONDITIONS

POLLUTION CONTROL EQUIPMENT

Vapor recovery system serving the truck loading rack

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall comply with all provisions of the National Emissions Standards for Hazardous Air Pollutants as specified in 40 CFR Part 61 Subpart M for Asbestos when conducting applicable renovation or demolition activities at the facility. **(40 CFR Part 61, Subpart M)**
2. The permittee shall notify the Department if a change in land use occurs for property classified as industrial or as a public roadway, where this classification was relied upon to demonstrate compliance with Rule 225(1). The notification shall be submitted to the AQD District Supervisor, within 30 days of the actual land use change. Within 60 days of the land use change, the permittee shall submit to the AQD District Supervisor a plan for complying with the requirements of Rule 225(1). The plan shall require compliance with 225(1) no later than one year after the due date of the plan submittal.² **(R 336.1225(4))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R336.1213(3)(b)(ii))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R336.1213(3)(b)(ii))**

NA

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. A facility for which the results, E_T , of the calculation in paragraph (a)(1) of §63.420 has been documented and is less than 0.50, is exempt from the requirements of 40 CFR Part 63, Subpart R, except that the permittee shall:
 - a. Operate the facility such that none of the facility parameters used to calculate results under paragraph (a)(1) of §63.420 is exceeded in any rolling 30-day period; and
 - b. Maintain records and provide reports in accordance with the provisions of §63.428(j). **(40 CFR 63.420(d))**
2. The permittee shall maintain a record of the calculations required in §63.420 (a)(1), including methods, procedures, and assumptions supporting the calculations for determining criteria in §63.420(d). **(40 CFR 63.428(j)(2))**
3. At any time following the notification required under paragraph (j)(1) of §63.428, and prior to any of the parameters being exceeded, the permittee may notify the Administrator and the AQD District Supervisor of modifications to the facility parameters. Each such notification shall document any expected HAP emission change resulting from the change in parameter. **(40 CFR 63.428(j)(3)), (R 336.1213(3))**
4. The permittee shall comply with all applicable provisions of Rules 605, 607, 609 and 627. **(R 336.1605), (R 336.1606), (R 336.1609), (R 336.1627)**

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).

C. EMISSION UNIT 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
EUTANK57	Tank 57- 3,208,000 gallons vertical tank with fixed roof for storage of distillate fuel oil	11/1/1993	NA
EULOADRACK	Seven Bay tank truck loading rack for petroleum products with vapor recovery or vapor combustion system controls.	1/1/1923	FGMACT6B
EUTANK12	Tank 12- 2,863,000 gallons tank with internal floating roof control.	1/1/1994	FGMACT6B, FGGASNSPS
EUTANK22	Tank 22- 3,526,000 gallons tank with internal floating roof control.	1/1/1992	FGMACT6B, FGGASNSPS
EUTANK56	Tank 56- 1,355,000 gallons tank with internal floating roof control.	1/1/1993	FGMACT6B, FGGASNSPS
EUTANK15	Tank 15- 2,922,000 gallons tank with internal floating roof control.	1/1/1928	FGMACT6B, FGGASTANKS
EUTANK16	Tank 16- 2,968,000 gallons tank with internal floating roof control.	1/1/1928	FGMACT6B, FGGASTANKS
EUTANK17	Tank 17- 2,960,000 gallons tank with internal floating roof control.	1/1/1928	FGMACT6B, FGGASTANKS
EUTANK18	Tank 18- 2,241,000 gallons tank with external floating roof tank and weather cover	1/1/1928	FGMACT6B, FGGASTANKS
EUTANK20	Tank 20- 2,776,000 gallons tank with external floating roof tank and weather cover	1/1/1928	FGMACT6B, FGGASTANKS
EUTANK23	Tank 23- 2,945,000 gallons tank with external floating roof tank and weather cover	1/1/1929	FGMACT6B, FGGASTANKS
EUTANK14	Tank 14- 2,789,000 gallons tank with internal floating roof control.	1/1/1928	FGGASTANKS
EUTANK24	Tank 24- 374,000 gallons tank with internal floating roof control	1/1/1933	FGGASTANKS
EUTANK25	Tank 25- 131,000 gallons tank with internal floating roof control	1/1/1949	FGGASTANKS
EUTANK13	Tank 13- 2,884,000 gallons vertical tank with fixed roof.	1/1/1924	FGDISTTANKS
EUTANK21	Tank 21- 3,179,000 gallons vertical tank with fixed roof.	1/1/1928	FGDISTTANKS

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUTANK8	Tank 8- 2,000 gallons horizontal tank with fixed roof control for waste water petroleum products storage	1/1/1979	FGFIXEDROOFTANKS
EUTANK52	Tank 52- 9,000 gallons vertical tank with fixed roof control for waste water petroleum products storage	1/1/1979	FGFIXEDROOFTANKS
EUTANK53	Tank 53- 9,000 gallons vertical tank with fixed roof control for waste water petroleum products storage	1/1/1979	FGFIXEDROOFTANKS
EUAIRSTRIPPER	Groundwater remediation system consisting of two air strippers and a SVE system with catalytic oxidizer (CATOX).	5/1/2000	FGAIRSTRIPPERS
EUBUTANE	117,905 gallon horizontal pressured butane storage tank	5/2012	FGRULE290

EUTANK57
EMISSION UNIT CONDITIONS

DESCRIPTION

A 3,208,000 gallons vertical fixed roof, identified as number 57, for storage of distillate fuel oil with contents of less than 3.5 kPa (0.5 psia) vapor pressure.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

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. **(R 336.1604(1))**
2. The permittee shall store in EUTANK57 materials that have a true vapor pressure of 0.5 psia or less (condition accepted by the permittee to avoid becoming subject to 40 CFR 60, Subpart Kb). **(R 336.1213(3))**

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

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. Daily records of the vapor pressure of the contents of EUTANK57 shall be maintained to demonstrate compliance with the 0.5 psia maximum vapor pressure limitation. **(R 336.1213(3))**
2. Recordkeeping of the type and temperature of the stored material in the tank is a requirement equivalent to measuring true vapor pressure. The permittee shall calculate the vapor pressure using the equations and/or methods described in EPA's AP-42, Chapter 7.1, Storage of Organic Liquid, November 2006 edition. Vapor pressure may be determined by interpolating values in Table 7.1-2 of Chapter 7.1, using the maximum liquid storage temperature or calculated as specified in Appendix 7. **(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)

1. 40 CFR 60, Subpart Kb, shall not apply to EUTANK57 because the permittee has accepted the limitation of storing organic compounds which have vapor pressure not exceeding 0.5 psia. **(R 336.1604(1)), (R 336.1213(2))**

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).

EULOADRACK EMISSION UNIT CONDITIONS

DESCRIPTION

Seven bay petroleum products truck loading rack. This emission unit is subject to 40 CFR 60 Subpart A (Applicability to NSPS provisions), Subpart XX (Standards of Performance for Bulk Gasoline Terminals) and Subpart BBBB (National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities).

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Permanent vapor recovery unit, permanent vapor combustion unit, and a portable vapor combustion unit whose location is restricted to the area shaded on the attached site plan in Appendix 9.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.VOC	10 mg/liter of gasoline loaded ²	6 hour test average	EULOADRACK	SC III.2, SC III.4 - SC III.10, SC V.1-SC V.7, SC VI.15	R 336.1225, R 336.1702, 40 CFR 63.11088(a)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1.Gasoline	850,000,000 gal/year ²	12 month rolling time period as determined at the end of each calendar month	EULOADRACK	SC VI.1	R 336.1225
2. Distillate	300,000,000 gal/year ²	12 month rolling time period as determined at the end of each calendar month	EULOADRACK	SC VI.1	R 336.1225

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 XX, as they apply to EULOADRACK.²
(40 CFR Part 60, Subparts A & XX)
2. The permittee shall not operate the petroleum product truck loading rack unless the vapor recovery system or vapor combustion unit is installed and operating properly.²
(40 CFR 60.502), (R 336.1910(1))
3. The permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility.²
(40 CFR 60.502(e)(2))
4. Loading of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:²
(40 CFR 60.502(e))

- a. The permittee shall cross check each tank identification number obtained in SC III.3 with the file of tank truck vapor tightness documentation within two weeks after the corresponding tank is loaded.
(40 CFR 60.502(e)(3))
- b. The permittee shall notify the owner or operator of each non vapor-tight gasoline tank truck loaded at the facility within 1 week of the documentation cross-check required in SC III.4a and 40 CFR § 60.502(e)(3).
(40 CFR 60.502(e)(4))
- c. The permittee shall take steps assuring that the non-vapor-tight gasoline tank truck will not be reloaded at the facility until vapor tightness documentation for that tank is obtained.
(40 CFR 60.502(e)(5))
- d. The permittee shall act to assure that loading of gasoline tank trucks at the facility are made only into tank trucks that are compatible with the terminal's vapor collection system.
(40 CFR 60.502(f))
5. The permittee shall not operate EULOADRACK unless the Malfunction Abatement Plan on file at the District Office, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The MAP shall be consistent with Rule 911(2). 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, by order of the AQD, revise the Malfunction Abatement Plan within the time specified in the order after such an event occurs and submit the revised plan to the AQD District Supervisor. The revised plan shall include procedures for maintaining and operating in a satisfactory manner, the Vapor Recovery Unit during malfunction events, and a program for corrective action for such events.²
(R 336.1911)
6. The permittee shall act to assure that the terminal and tank truck's vapor collection system are connected during each loading of a gasoline tank truck at the facility.²
(40 CFR 60.502(g))
7. Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for the total organic compounds liquid or vapor leaks. For the purpose of this inspection, detection methods such as sight, sound or smell are acceptable.²
(40 CFR 60.502(j))
8. 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 (15) calendar days after the leak is detected.²
(40 CFR 60.502(j))
9. 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 unless the delivery vessels are controlled by a vapor system that capture all displaced organic vapor and air by means of a vapor-tight collection line. Compliance with this requirement shall be considered compliance with **40 CFR 60.502(a)**, which has been subsumed under this streamlined requirement.²
(40 CFR 60.502(a), (40 CFR Part 60, Subpart XX), (R 336.1609(2))
10. Any delivery vessel located at the facility shall be equipped, maintained or controlled with an interlocking system or procedure to ensure that the vapor-tight collection line is connected before any organic compound can be loaded.²
(R 336.1609(3)(a))
11. 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.²
(R 336.1627(7))
12. The 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:²
 - 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 366.1225)**
- 13. The permittee shall develop written procedures for the operation of the above control measures and shall post those procedures in an accessible and conspicuous location near the loading device.² **(R 336.1609(4))**
- 14. The permittee shall not operate the Portable Vapor Combustion Unit (PVCU) authorized under this emission unit unless the PVCU is located in the shaded area indicated on the site plan in Appendix 9.¹ **(R 336.1225)**
- 15. Each owner or operator of a bulk gasoline terminal 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. **(40 CFR 63.11092(b))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

- 1. After June 30, 1981, it is unlawful for a person to load, or allow the loading of, any organic compound that has a true vapor pressure of more than 1.5 psia at actual conditions from any stationary vessel into any delivery vessel located at an existing loading facility which has a throughput of 5,000,000 or more gallons of such compounds per year, unless such delivery vessel is filled by a submerged fill pipe.² **(R 336.1225),(R 336.1609(1))**
- 2. Each vapor collection system shall be designed to prevent any total organic compounds vapor collected at one loading rack from passing to another loading rack.² **(40 CFR 60.502(d))**
- 3. The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in a 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 §60.503(d).² **(40 CFR 60 502(h))**
- 4. 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))**
- 5. Any delivery vessel located at the facility shall be equipped, maintained or controlled with 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.² **(R 336.1609(3)(c))**
- 6. Any delivery vessel located at the facility shall be equipped, maintained or controlled with 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.² **(R 336.1609(3)(d))**
- 7. Any delivery vessel located at the facility shall be equipped, maintained or controlled with hatch openings that are kept closed and vapor-tight during the loading of the delivery vessel.² **(R 336.1609(3)(d))**
- 8. For the flare control system, if such is installed at the facility, a heat-sensing device, such as an ultraviolet beam sensor or a thermocouple, shall be installed in proximity to the pilot light to indicate the presence of a flame.² **(40 CFR 63.427(a)(4))**

V. TESTING/SAMPLING

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

- 1. Within 365 days of the issuance date of this permit and once every 5 consecutive years thereafter, the permittee shall verify the VOC emission rate from EULOADRACK, by testing, in accordance with Department requirements. Not 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. Not less than 7 days prior to the tests, the permittee shall notify the AQD in writing of the time and place of the tests and who shall conduct them. 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.² **(40 CFR 60.8(a), R 336.1213(3))**

2. In conducting the performance tests required in SC V.1, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in §60.503(a), except as provided in §60.8(b). The three-run requirement of §60.8(f) does not apply to this subpart.² **(40 CFR 60.503(a))**
3. Immediately before the performance test required to determine compliance with §60.502 (b), (c), and (h), the owner or operator shall use Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The owner or operator shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.² **(40 CFR 60.503(b))**
4. The owner or operator of an affected facility shall provide the administrator at least 30 days prior notice of any performance test, except as specified under other subparts, to afford the administrator the opportunity to have an observer present.² **(40 CFR 60.8(d))**
5. Compliance with standards in this part, other than opacity standards, shall be determined in accordance with performance tests established by §60.8 unless otherwise specified in the applicable standard.² **(40 CFR 60.11(a))**
6. Each owner or operator of a bulk gasoline terminal subject to the emission standard in item 1(b) of Table 2 to Subpart BBBB must comply with the requirements in paragraphs (a) through (d) of §63.11092. **(40 CFR 63.11092(a))**
7. If the permittee is operating EULOADRACK 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 EULOADRACK in lieu of the test required under paragraph (a)(1) of §63.11092. **(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. The permittee shall keep records of the EULOADRACK throughput volume of each specific petroleum product for each calendar month and each 12-month rolling time period. All records shall be kept on file for a period of at least five years and made available to the Department upon request.² **(R 336.1225)**
2. Maintain a record of the results of the inspections performed as applicable requirements by rule.² **(R 336.1627)**
3. The permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least 5 years.² **(40 CFR 60.505(f))**
4. The permittee shall keep documentation of all notifications required under §60.502(e)(4) on file at the terminal for five years.² **(40 CFR 60.505(d))**
5. For facilities that utilize a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection by permitting authority representatives during the course of a site visit, or within a mutually agreeable time frame.²
 - a. The copy of each record in paragraph (e)(2) of §60.505 is an exact duplicate image of the original paper record with certifying signatures.
 - b. The permitting authority is notified in writing that each terminal using this alternative is in compliance with paragraph (e)(2) of §60.505.

6. The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, as a minimum, the following information:² **(40 CFR 60.505 (b))**
 - a. Test title: Gasoline Delivery Tank Pressure Test-EPA Reference Method 27.
 - b. Tank owner and address
 - c. Tank identification number
 - d. Testing location
 - e. Date of test
 - f. Tester name and signature
 - g. Witnessing inspector, if any: Name, signature, and affiliation
 - h. Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs). **(40 CFR 60.505 (b))**
7. A record of each monthly leak inspection required under §60.502(j) shall be kept on file at the terminal for at least 5 years. Inspection records shall include, as a minimum, the following information:²
 - a. Date of inspection
 - b. Findings (may indicate no leaks discovered; or location, nature and severity of each leak).
 - c. Leak determination method
 - d. Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).
 - e. Inspector name and signature **(40 CFR 60.505 (c))**
8. The terminal owner or operator shall keep documentation of all notifications required under §60.502(e)(4) on file at the terminal for at least 5 years.² **(40 CFR 60.505 (d))**
9. As an alternative to keeping records at the terminal of each gasoline cargo tank test result as required in paragraphs (a), (c), and (d) of §60.505, an owner or operator may comply with the requirements in either paragraph a or b as follows:² **(40 CFR 60.505 (e))**
 - a. An electronic copy of each record is instantly available at the terminal.
 - (1) The copy of each record in paragraph (e)(1) of §60.505 is an exact duplicate image of the original paper record with certifying signatures.
 - (2) The permitting authority is notified in writing that each terminal using this alternative is in compliance with paragraph (e)(1) of §60.505.
 - b. For facilities that utilize a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection by permitting authority representatives during the course of a site visit, or within a mutually agreeable time frame.
 - (1) The copy of each record in paragraph (e)(2) of §60.505 is an exact duplicate image of the original paper record with certifying signatures.
 - (2) The permitting authority is notified in writing that each terminal using this alternative is in compliance with paragraph (e)(2) of §60.505.

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 EULOADRACK in accordance with the National Emission Standards for Hazardous Air Pollutants (NESHAP) as specified in 40 CFR Part 63 Subparts A and BBBBBB, as they apply to EULOADRACK. **(40 CFR Part 63, Subparts A and BBBBBB)**
5. The permittee shall include in a semiannual report to the Administrator, each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility. **(40 CFR 63.11095(a)(2))**

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 Dimensions (feet)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1.SV VRU	12 ¹	22 ¹	R336.1225
2.SV PERMANENTVCU	8 ¹	45 ¹	R336.1225
3.SV PORTABLEVCU	8.5 ¹	13 ¹	R336.1225

IX. OTHER REQUIREMENT(S)

1. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.² **(R 336.1912).(R 336.1091)**
2. The permittee shall comply with all applicable provisions of Rules 605, 606, 609 and 627.² **(R 336.1605), (R 336.1606), (R 336.1609), (R 336.1627)**
3. 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)**

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 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
FGMACT6B	Area source gasoline distribution bulk terminal with gasoline storage tanks and gasoline loading rack subject to 40 CFR Subpart BBBB.	EULOADRACK, EUTANK12, EUTANK15, EUTANK16, EUTANK17, EUTANK18, EUTANK20, EUTANK22, EUTANK23 & EUTANK56
FGGASNSPS	Three petroleum products storage tanks, each equipped with a floating roof, and NSPS subject	EUTANK12, EUTANK22, & EUTANK56
FGGASTANKS	Nine petroleum products storage tanks each equipped with a floating roof	EUTANK14, EUTANK15, EUTANK16, EUTANK17, EUTANK18, EUTANK20, EUTANK23, EUTANK24 & EUTANK25
FGDISTTANKS	Four distillate petroleum products storage tanks	EUTANK5, EUTANK9, EUTANK13 & EUTANK21
FGFIXEDROOFTANKS	Three petroleum products tanks with fixed roofs	EUTANK8, EUTANK52 & EUTANK53
FGAIRSTRIPPERS	Groundwater remediation system consisting of two air strippers and a SVE system with catalytic oxidizer (CATOX).	EUAIRSTRIPPER
FGRULE290	One butane tank	EUBUTANE

FGMACT6B FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Units: EULOADRACK, EUTANK12, EUTANK15, EUTANK16, EUTANK17, EUTANK18, EUTANK20, EUTANK22, EUTANK23 & EUTANK56

POLLUTION CONTROL EQUIPMENT

Internal floating roofs, permanent vapor recovery unit, permanent vapor combustion unit, and a portable vapor combustion unit whose location is restricted to the area shaded on the attached site plan in Appendix 9.

I. EMISSION LIMIT(S)

NA - Refer to EULOADRACK in Part C of this document

II. MATERIAL LIMIT(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))**

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 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))**
 - a. The equipment type and identification number;
 - b. The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell);
 - c. The date the leak was detected and the date of each attempt to repair the leak;
 - d. Repair methods applied in each attempt to repair the leak;
 - e. "Repair delayed" and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak;
 - f. The expected date of successful repair of the leak if the leak is not repaired within 15 days; and
 - g. The date of successful repair of the leak.

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))**

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)**

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).

FGGASNSPS FLEXIBLE GROUP CONDITIONS
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DESCRIPTION

Emissions from Three petroleum products storage tanks, each equipped with an internal floating roof including landing (3 events/year/tank) and cleanings.

Emission Units: EUTANK12, EUTANK22, & EUTANK56

POLLUTION CONTROL EQUIPMENT

Internal floating Roof

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

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 FGGASNSPS.²
(40 CFR Part 60, Subparts A & Kb)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The vessel shall be 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 roof and the vessel wall.²
(R 336.1604(1)(b)), (40 CFR 60.112(b)(a)(1))
2. The seal or any seal fabric shall have no visible holes, tears or other nonfunctional openings
(R 336.1604(1)(b)), (40 CFR 60.112(b)(a)(1))
3. The permittee shall equip all emission units within FGGASNSPS with covers that completely cover all openings except for those which are no larger than necessary to allow safe clearance for the floating roof. The openings shall be covered at all times except when in actual use.²
(40 CFR Part 60.112b(1)(C)(iii thru ix))

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. After installing the control equipment required to meet §60.112b(a)(1) (permanently affixed roof and internal floating roof), each owner or operator shall:

- 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 §60.115b(a)(3). **(40 CFR 60.113b(a)(2))**
 - c. For vessels equipped with a double-seal system as specified in §60.112b(a)(1)(ii)(B):
 - (1) Visually inspect the vessel as specified in paragraph (a)(4) of §60.113b(a)(3) at least every 5 years; or
 - (2) Visually inspect the vessel as specified in paragraph (a)(2) of §60.113b(a)(3). **(40 CFR 60.113b(a)(3))**
 - d. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs (a)(2) and (a)(3)(ii) of §60.113b(a)(4) and at intervals no greater than 5 years in the case of vessels specified in paragraph (a)(3)(i) of §60.113b(a)(4). **(40 CFR 60.113b(a)(4))**
 - e. Notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs (a)(1) and (a)(4) of §60.113b(a)(5) to afford the Administrator the opportunity to have an observer present. If the inspection required by paragraph (a)(4) of §60.113b(a)(5) 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 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation, or by express mail so that it is received by the Administrator at least 7 days prior to the refilling. **(40 CFR 60.113b(a)(5))**
2. The permittee shall keep readily accessible records that show the dimensions of each storage vessel and an analysis that show the capacity of the storage vessel. The records shall be kept as long as the storage vessel remains in operation. **(40 CFR 60.110b), (40 CFR 60.116b)**
 3. The owner or operator of each storage vessel in FGGASNSPS shall maintain a record of the volatile organic liquid (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)**
 4. The owner or operator of each storage vessel in FGGASNSPS shall notify the Administrator within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range, 5.2 KPa (0.75 psia) maximum for vessels equal to or greater than 151 m³ (950 bbl.) and 27.6 KPa (4.0 psia) for vessels between 75 m³ and 150 m³ (476 - 950 bbl.). This condition is not applicable to storage vessels less than 75 m³. **(40CFR60.116)(d))**

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 owner or operator of each storage vessel in FGGASNSPS, as specified in 40 CFR 60.112b(a), shall keep records and furnish reports as required by paragraphs (a), (b), or (c) of §60.113b depending upon the control equipment installed to meet the requirements of §60.115b. The owner or operator shall keep copies of all reports and records required by §60.113b, except for the record required by (c)(1), for at least 5 years. The record required by (c)(1) of §60.115b will be kept for the life of the control equipment. **(40 CFR 60.115b)**
 - a. After installing control equipment in accordance with §60.112b(a)(1) (fixed roof and internal floating roof), the owner or operator shall meet the following requirements:
 - (1) Furnish the Administrator with a report that describes the control equipment and certifies that the control equipment meets the specifications of §60.112b(a)(1) and §60.113b(a)(1). This report shall be an attachment to the notification required by §60.7(a)(3).
 - (2) Keep a record of each inspection performed as required by §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).
 - (3) If any of the conditions described in §60.113b(a)(2) are detected during the annual visual inspection required by §60.113b(a)(2), a report shall be furnished to the Administrator 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.
 - (4) After each inspection required by §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 §60.113b(a)(3)(ii), a report shall be furnished to the Administrator within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of §61.112b(a)(1) or §60.113b(a)(3) and list each repair made.

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. Applicant shall equip all openings, except stub drains, in the stationary vessel, with covers, lids, or seals such that all of the following conditions are met: **(R 336.1604(2))**
 - a. The cover, lid, or seal is to be maintained in the closed position at all times, except when in actual use. **(R 336.1604(2)(a))**

- b. Automatic bleeder vents are closed at all times, except when the roof is floated off, or landed on, the roof leg supports. **(R 336.1604(2)(b))**
- 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 supports. **(R 336.1604(2)(c))**
- 2. 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)**
- 3. The permittee shall not equip any storage tank with an external floating roof. **(R 336.1623)**
- 4. The permittee shall comply with all applicable provisions of Rules 604 and 605. **(R 336.1604 and R 336.1605)**

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).

FGGASTANKS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Emissions from Nine petroleum products storage tanks each equipped with an internal floating roof including landing emissions (3/year/tank) and cleanings.

Emission Units: EUTANK14, EUTANK15, EUTANK16, EUTANK17, EUTANK18, EUTANK20, EUTANK23, EUTANK24 & EUTANK25

POLLUTION CONTROL EQUIPMENT

Internal floating roof

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The vessel shall be 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 roof and the vessel wall.² **(R 336.1604(1)(b))**
2. The seal or any seal fabric shall have no visible holes, tears or other malfunctional openings. **(R 336.1604(1)(b))**
3. The permittee shall equip all emission units within FGGASTANKS with covers that completely cover all openings except for those which are no larger than necessary to allow safe clearance for the floating roof. The openings shall be covered at all times except when in actual use.² **(R 336.1604(2))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

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. **(R336.1213(3)(b)(ii))**
2. The permittee shall keep readily accessible records that show the dimensions of each storage vessel and an analysis that show the capacity of the storage vessel. The record shall be kept as long as the storage vessel remains in operation. **(40CFR60.110b),(40CFR60.111b)**

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. Report shall be received by 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. Report shall be received by 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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall equip all openings, except stub drains, in the stationary vessel, with covers, lids, or seals such that all of the following conditions are met: **(R 336.1604(2))**
 - (a) The cover, lid, or seal is in the closed position at all times, except when in actual use. **(R 336.1604(2)(a))**
 - (b) Automatic bleeder vents are closed at all times, except when the roof is floated off, or landed on, the roof leg supports. **(R 336.1604(2)(b))**
 - (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 supports. **(R 336.1604(2)(c))**
2. 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)**
3. The permittee shall comply with all applicable provisions of Rules 604 and 605. **(R 336.1604 and R 336.1605)**

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).

FGDISTTANKS FLEXIBLE GROUP CONDITIONS
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DESCRIPTION

Emission from Two fixed roof distillate petroleum products storage tanks including cleanings with a capacity greater than 40,000 gallons.

Emission Units: EUTANK13 & EUTANK 21

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The 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. **(R336.1604(1))**

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

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 maintain records on true vapor pressure (as defined in R 336.1120(i)) of all organic compounds stored, in psia, at actual storage conditions. **R336.1213(3),(R336.1604(1))**

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Applicable Underlying Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of Rule 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).

**FGFIXEDROOFTANKS
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Emissions from Three petroleum products tanks with fixed roofs including cleanings, each of which has a capacity of less than 10,000 gallons.

Emission Units: EUTANK8, EUTANK52 & EUTANK53

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The owner or operator shall not store any organic compound in FGFIXEDROOFTANKS having a true vapor pressure (as defined in R336.1120(i)) of more than 1.5 psia. **(R 336.1604(1))**
2. The owner or operator shall not store any carcinogenic liquids. **(R 336.1213(3))**

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

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 maintain records on true vapor pressure (as defined in R 336.1120(i)) of all organic compounds stored, in psia, at actual storage conditions. **(R 336.1213(3)), (R 336.1604(1))**
2. The permittee shall keep a record of all materials stored in FGFIXEDROOFTANKS. Records shall be made available to the Air Quality Division upon request. **(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)

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of Rule 604. **(R336.1604)**

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).

**FGAIRSTRIPPERS
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Groundwater remediation system consisting of two air strippers and a soil vapor extraction system

Emission Unit: EUAIRSTRIPPER

POLLUTION CONTROL EQUIPMENT

Catalytic oxidizer

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
VOC	20 lbs/month	Calendar month	EUAIRSTRIPPER	IV.1, VI.1, VI.2	R 336.1290(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(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(a)(i))**
2. Each emission unit that the total uncontrolled or controlled emissions of 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(a)(ii))**
 - a. For noncarcinogenic 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 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(ii)(A))**
 - b. For noncarcinogenic 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 microgram 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(a)(ii)(B))**
 - c. For carcinogenic 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(a)(ii)(C))**
 - d. The emission unit shall not emit any 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(a)(ii)(D))**

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)**

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 336.1213(3)(b)(ii))**

1. Total VOC concentration shall be determined using the standard MDEQ groundwater analytical scans for VOCs. Any request for a change in the sampling frequency shall be submitted to the AQD District Supervisor for review and approval.² **(R 336.1225, R 336.1702(a))**

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. On a monthly basis, the permittee shall monitor, 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. Total VOC concentration shall be determined using the standard MDEQ groundwater analytical scans for VOCs. Any request for a change in the sampling frequency shall be submitted to the AQD District Supervisor for review and approval.² **(R 336.1225, R 336.1702(a), R 336.1213(3))**
2. All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification 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)

Buckeye Terminals, LLC,
River Rouge Terminal

ROP No: MI-ROP-B2987-2016
Expiration Date: March 1, 2021
PTI No: MI-PTI-B2987-2016

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).

FGRULE290 FLEXIBLE GROUP CONDITIONS
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DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.

Emission Unit: EUBUTANE

POLLUTION CONTROL EQUIPMENT

NA

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(a)(i))
2. Each emission unit that the total uncontrolled or controlled emissions of 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(a)(ii))
 - a. For noncarcinogenic 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 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 1,000 or 500 pounds per month, respectively.
(R 336.1290(a)(ii)(A))
 - b. For noncarcinogenic 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 microgram 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(a)(ii)(B))
 - c. For carcinogenic 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(a)(ii)(C))
 - d. The emission unit shall not emit any 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(a)(ii)(D))
3. Each emission unit that emits only noncarcinogenic particulate air contaminants and other air contaminants that are exempted under Rule 290(a)(i) and/or Rule 290(a)(ii), if all of the following provisions are met:
(R 336.1290(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 an exhaust gas flow rate more than 30,000 actual cubic feet per minute. **(R 336.1290(a)(iii)(A))**

- b. The visible emissions from the emission unit are not more than five percent opacity in accordance with the methods contained in Rule 303. **(R 336.1290(a)(iii)(B))**
- c. The initial threshold screening level for each particulate air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(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)**

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 336.1213(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 DEQ, 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(a)(ii) and (iii). **(R 336.1213(3))**
 - e. 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. **(R 336.1213(3), R 336.1290(c))**
- 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(b), R 336.1213(3))**
 - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(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(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 the requirements identified in the table below are not applicable to the specified emission unit(s) and/or flexible group(s). This determination is incorporated into the permit shield provisions set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii). If the permittee makes a change that affects the basis of the non-applicability determination, the permit shield established as a result of that non-applicability decision is no longer valid for that emission unit or flexible group.

Emission Unit/Flexible Group ID	Non-Applicable Requirement	Justification
EUTANK57	40 CFR 60, Subpart Kb	Permittee has requested that condition to store only materials having a true vapor pressure of 0.5 psia or less.

Appendix 1: Abbreviations and Acronyms

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
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H ₂ S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfunction Abatement Plan	MW	Megawatts
MDEQ	Michigan Department of Environmental Quality	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO _x	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM10	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
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-B2987-2008. 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-B2987-2008a is being reissued as Source-Wide PTI No. MI-PTI-B2987-2016.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	201100069	Administrative Amendment-Name Change	Source-wide
189-12	NA	Seven bay Petroleum Products truck loading rack	EULOADRACK

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 EUTANK57 and FGAIRSTRIPPERS.

- For EUTANK57, to determine the maximum true vapor pressure (P_{Vx}), the permittee shall use the methods and procedures specified in EPA's AP-42, Chapter 7.1 Storage of Organic Liquids, November 2006 edition, which may include the use of the following equation:

$$P_{Vx} = \exp [A - (B/T_{Lx})]$$

Where:

exp = exponential function

A = constant in the vapor pressure equation, dimensionless

B = constant in the vapor pressure equation, °R

T_{Lx} = maximum daily liquid surface temperature, °R

P_{Vx} = true vapor pressure at the daily maximum liquid surface temperature, psia

- The following table is to be used to make required calculations for VOC emission rates from FGAIRSTRIPPERS:

Groundwater Remediation Emission Calculation and Recordkeeping

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

Date	A Water Flow (gal/min)	B C D Concentration (ppm)			F Control Efficiency (Percent)	E VOC Emissions (lbs./hr.)
		Inlet	Outlet	In - Out		
EXAMPLE	100	210	10	200	95	0.5

EQUATION TO CALCULATE EMISSIONS: $D = B - C$, all units in parts per million (ppm)

Signature: _____

Date: _____

Telephone Number: _____

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the MDEQ Report Certification form (EQP 5736) and MDEQ 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.

Appendix 9. Site Plan

The location of the portable vapor combustion unit is restricted to the shaded area indicated below:

