STATE OF MISSISSIPPI
AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

MGC Terminal LLC
101 65th Avenue
Meridian, Mississippi
Lauderdale County

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Krystal Rudolph

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: January 28, 2021 **Permit No.: 1460-00009**

SECTION 1

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)

2. Any activities not identified in the application are not authorized by this permit.

   (Ref.: Miss. Code Ann. 49-17-29 1.b)

3. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)

4. It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)

5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)

6. It shall not be a defense for a 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 the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)

7. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)

8. The permit does not convey any property rights of any sort, or any exclusive privilege.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)

9. The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

10. Design and Construction Requirements: The stationary source shall be designed and constructed so as to operate without causing a violation of an Applicable Rules and Regulations, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries.

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A.)

11. Solids Removal: The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits.

    (Ref.: Miss. Code Ann. 49-17-29)

12. Diversion and Bypass of Air Pollution Controls: The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants."

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

13. Fugitive Dust Emissions from Construction Activities: The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum.

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(4).)

14. Right of Entry: The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:

a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and

b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emissions.

(Ref.: Miss. Code Ann. 49-17-21)

15. Permit Modification or Revocation: After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to:

a) Persistent violation of any of the terms or conditions of this permit;

b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.C.)

16. Public Record and Confidential Information: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality, Office of Pollution Control.

(Ref.: Miss. Code Ann. 49-17-39)

17. Permit Transfer: This permit shall not be transferred except upon approval of the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)

18. Severability: The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)

19. Permit Expiration: The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more.

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1).)

20. Certification of Construction: A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee.

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)

21. Beginning Operation: Except as prohibited in Section 1, Condition 24 of this permit, after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G.

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)

22. Application for a Permit to Operate: Except as otherwise specified in Section 1, Condition 24 of this permit, the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing.

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)

23. Operating Under a Permit to Construct: Except as otherwise specified in Section 1, Condition 24 of this permit, upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate.

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)

24. Application Requirements for a Permit to Operate for Moderate Modifications: For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to “net” out of PSD/NSR, the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities.

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7).)

25. General Duty: All air emission equipment shall be operated as efficiently as possible to provide the maximum reduction of air contaminants.

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

26. Deviation Reporting: Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began.

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

27. Compliance Testing: Regarding compliance testing:

    a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.

    b) Compliance testing will be performed at the expense of the permittee.

    c) Each emission sampling and analysis report shall include but not be limited to the following:

        (1) detailed description of testing procedures;

        (2) sample calculation(s);

        (3) results; and

        (4) comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(3), (4), and (6).)

B. GENERAL NOTIFICATION REQUIREMENTS

1. Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).)

2. The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)

3. Upon the completion of construction or installation of an approved stationary source or modification, and prior to commencing operation, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1) and (3).)

4. The Permit Board shall be promptly notified in writing of any change in construction from the previously approved plans and specifications or permit. If the Permit Board determines the changes are substantial, it may require the submission of a new application to construct with "as built" plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an "as built" application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).)

SECTION 2
EMISSION POINT DESCRIPTION

The permittee is authorized to construct and operate, upon certification of construction, air emissions equipment, as described in the following table.

Emission Point	Description
AA-000	Bulk Fuel Terminal Facility
AA-005	North Gasoline and Diesel loading rack with eleven loading arms and two bays, including piping and component leaks.
AA-008	John Zink Vapor Combustion Unit (VCU) used to control gasoline emissions from the Emission Points AA-005 and AA-025. (Ref. # ZCT-3-8-45-X-218-X)
AA-017	South Diesel loading rack with two bays, including piping and component leaks.
AA-025	New Maples Gasoline and Diesel loading rack four bays, including piping and component leaks. (*Upon certification of construction*)
AA-026	90,000 gallon Butane pressurized storage tank (*Upon certification of construction*)

SECTION 3
EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limitation/Standard
AA-000 (Facility-wide)	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.1	Operational Restriction	≤ 400,000,000 gallons of gasoline throughput in any consecutive 12-month period and ≤ 600,000 gallons of total fuel throughput in any consecutive 12-month period (*Title V/PSD Avoidance limit*)
	40 CFR 63 Subpart BBBBBB Standards for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities 40 CFR 63.11081(a)(1), Subpart BBBBBB	3.2	Applicability	Applicability
AA-005 AA-008 AA-025	40 CFR Part 60, Subpart XX Standards of Performance for Bulk Gasoline Terminals 40 CFR 60.500, Subpart XX	3.3	Applicability	Applicability
	40 CFR 60.502(b), Subpart XX and 40 CFR 63.11081(i), Subpart BBBBBB	3.4		≤ 35 mg TOC/L gasoline loaded, and other vapor collection system and loading requirements
	40 CFR 60.502(h), Subpart XX	3.5	VOC	Design and operational requirements
	40 CFR 60.502(i), Subpart XX	3.6	VOC	Design requirements
	40 CFR 60.502(a) and (d), Subpart XX and 40 CFR 63.11088(a), 40 CFR 63 Subpart BBBBBB, Table 2	3.7	VOC/HAP	Design and operational requirements

3.1 For Emission Point AA-000, the permittee shall limit facility-wide gasoline throughput to no more than 400,000,000 gallons in any consecutive 12-month period and shall limit total fuel, additives, and butane to no more than 600,000 gallons in any consecutive 12-month period (*Title V/PSD Avoidance limit*).

(11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

3.2 For Emission Point AA-000, the permittee is subject to and shall comply with the applicable requirements of National Emissions Standards for Hazardous Air Pollutants for Source Category (NESHAP), 40 CFR 63, Subpart A - General Provisions and Subpart BBBBBB - Standards for Gasoline Distribution Bulk Terminals, Bulk Plants, and

Pipeline Facilities. For the purposes of this subpart, the facility is considered a bulk gasoline terminal. The permittee shall be in compliance with the standards in this subpart three years from permit issuance.

(Ref.: 40 CFR 63.11081(a)(1), Subpart BBBBBB)

3.3 For Emission Points AA-005, AA-008, and AA-025, the permittee is subject to and shall comply with the NSPS, 40 CFR 60, Subpart XX - Standards of Performance for Bulk Gasoline Terminals when construction or modification is commenced after December 17, 1980. The affected facility to which the provisions of this subpart apply is the total of all the loading racks at a bulk gasoline terminal which deliver liquid product into gasoline tank trucks.

(Ref.: 40 CFR 60.500, Subpart XX)

3.4 For Emission Points AA-005, AA-008, and AA-025, For Emission Point AA-001, the Total Organic Compounds shall be limited to 35 mg of TOC/liter of gasoline loaded, as determined by EPA Reference Methods 25A or 25B, Appendix A and the test methods and procedures specified in 40 CFR 60.503 and 63.11092(a)(i).

(Ref.: 40 CFR 60.502(b), Subpart XX and 40 CFR 63.11081(i), Subpart BBBBBB)

3.5 For Emission Points AA-005, AA-008, and AA-025, the vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measure by the procedures specified in 40 CFR 60.503(d).

(Ref.: 40 CFR 60.502(h), Subpart XX)

3.6 For Emission Points AA-005, AA-008, and AA-025, no pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water).

(Ref.: 40 CFR 60.502(i), Subpart XX)

3.7 For Emission Points AA-005, AA-008, and AA-025, the permittee must:

a. equip each loading rack with a vapor collection system designed to collect the TOC vapors displaced from cargo tanks during product loading and;

b. design and operated the vapor collection system to prevent any TOC vapors collected at one loading rack from passing to another loading rack and;

c. limit the loading of gasoline into gasoline cargo tanks that are vapor tight using the procedures specified in 40 CFR 60.502(e) through (j);

Note: The permittee is limited to 35 mg TOC/liter of gasoline loaded into gasoline cargo tanks from the loading rack (Condition 3.4 of this permit). The loading rack is also subject to 80 mg TOC per liter of gasoline loaded (Table 2 of 40 CFR 63, Subpart BBBBBB). By demonstrating compliance with the more stringent NSPS Subpart XX limit of 35 mg TOC/liter of gasoline loaded into gasoline cargo tanks from the loading

rack the permittee will also demonstrate compliance with the NESHAP Subpart BBBBBB limit.

(Ref.: 40 CFR 60.502(a) and (d), Subpart XX and 40 CFR 63.11088(a), 40 CFR 63 Subpart BBBBBB, Table 2)

SECTION 4
WORK PRACTICES

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Work Practice
AA-000 (Facility-Wide)	40 CFR 63.11085(a), Subpart BBBBBB	4.1	HAP	Shall operate and maintain any affected source in a manner consistent with safety and good air pollution control practices
AA-005 AA-008 AA-025	40 CFR60.502(e)(1)-(5), Subpart XX	4.2	VOC	Loading procedures
	40 CFR 60.502(f), Subpart XX	4.3		Compatible collection equipment requirement
	40 CFR 60.502(g), Subpart XX	4.4		Ensure vapor collection connection
	40 CFR 63.11092(d), Subpart BBBBBB	4.5	HAP	Operational requirement

4.1 For Emission Point AA-000, the permittee shall, at all times, operate and maintain in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the DEQ, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR 63.11085(a), Subpart BBBBBB)

4.2 For Emission Points AA-005, AA-008, and AA-025, loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:

a. The permittee shall obtain the vapor tightness documentation meeting the requirements in Condition 5.4 for each gasoline tank truck which is to be loaded.

b. The permittee shall document the tank identification number of each gasoline tank truck loaded per loading event

c. The permittee shall cross-check each tank identification number with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded unless either (i) or (ii) below is maintained. If either the quarterly or semiannual cross-check (c)(i) or (ii) of this condition reveals that these conditions were not maintained, the source must return to biweekly monitoring until such time as these conditions are again met.

i. If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation, then the documentation cross-check shall be performed each quarter; or

ii. If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation, then the documentation cross-check shall be performed semiannually.

d. The permittee shall notify the owner or operator of each non vapor-tight gasoline tank truck loaded at the affected facility within 1 week of the documentation cross-check required in (c) above

e. The permittee shall take steps assuring that the non vapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained.

(Ref.: 40 CFR 60.502(e)(1)-(5), Subpart XX)

4.3 For Emission Points AA-005, AA-008, and AA-025, the permittee shall act to assure that loadings of gasoline tank trucks at the affected facility are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.

(Ref.: 40 CFR 60.502(f), Subpart XX)

4.4 For Emission Points AA-005, AA-008, and AA-025, the permittee shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks.

(Ref.: 40 CFR 60.502(g), Subpart XX)

4.5 For Emission Points AA-005, AA-008, and AA-025, the permittee shall operate the vapor processing system in a manner not to exceed or go below, as appropriate, the operating parameter required in Condition 5.7. Operation of the vapor processing system in a manner exceeding or going below the operating parameter value, as appropriate, shall constitute a violation of the emission standard in Condition 3.4. However, malfunctions discovered by the monitoring and inspections required in Condition 5.3 shall not constitute a violation of the emissions standard if corrective actions described in the monitoring and inspection plan are followed. Also, the permittee shall ensure the steps listed in 40 CFR 63.11092(d)(4)(i-v) are followed.

(Ref.: 40 CFR 63.11092(d), Subpart BBBBBB)

SECTION 5
MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Monitoring/Recordkeeping Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R.2.2.B(11).	5.1	Fuel Throughput	Conduct and maintain monthly and 12-month rolling totals of facility-wide product throughput.
AA-005 AA-008 AA-025	11 Miss. Admin. Code Pt. 2, R.2.2.B(11). 40 CFR 60.503, Subpart XX 40 CFR 63.11092, Subpart BBBBBB	5.2	TOC	Stack test requirement
	40 CFR 60.502(j), Subpart XX	5.3	TOC	Monthly inspections
	40 CFR 60.505(a-b), 40 CFR 60.505(e), Subpart XX 40 CFR 63.11088(f), 40 CFR 63.11094(b-c), Subpart BBBBBB	5.4	TOC/HAP	Recordkeeping requirement
	40 CFR 60.505(c), Subpart XX	5.5	TOC	Recordkeeping requirement
	40 CFR 60.505(d), Subpart XX	5.6	TOC	Recordkeeping requirement
	40 CFR 63.11092(b)(1)(iii), Subpart BBBBBB	5.7	HAP	Monitoring requirement

5.1 The permittee shall maintain records of the total throughput of each product (gasoline, additive, diesel, ethanol, and off-spec) on a monthly basis and each consecutive 12 month period on a rolling basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R.2.2.B(11).)

5.2 For Emission Points AA-005, AA-008, and AA-025, the permittee shall demonstrate compliance with the TOC emission limitations on the vapor combustion unit by stack testing in accordance with EPA Reference Method 25A or 25B and the test methods and procedures specified in 40 CFR 60.503 and 40 CFR 63.11092(a)(i). A stack test shall be conducted biennially. Subsequent tests shall not to exceed 25 months from the previous test.

The test shall be six hours in duration during which at least 300,000 liters of gasoline must be loaded. If this is not possible, the test may be continued the same day until 300,000 liter of gasoline is loaded or the test may be resumed the next day with another complete 6-hour period. In the latter case, the 300,000 liter criterion need not be met. However, as much as possible, testing should be conducted during the 6-hour period in which the highest throughput normally occurs.

The permittee shall submit a written test protocol at least sixty (60) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the DEQ. Also, the permittee shall notify the DEQ in writing at least ten (10) days prior to the test so that an observer may be afforded the opportunity to witness the test.

(Ref: 11 Miss. Admin. Code Pt. 2, Ch. 2. 2.2.B(11)., 40 CFR 60.503, Subpart XX and 40 CFR 63.11092, Subpart BBBBBB)

5.3 For Emission Points AA-005, AA-008, and AA-025, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected each calendar month during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded, and the source of the leak repaired within 15 calendar days after it is detected.

(Ref.: 40 CFR 60.502(j), Subpart XX)

5.4 For Emission Points AA-005, AA-008, and AA-025, the permittee shall keep records of the test results for each gasoline cargo tank loading at the facility available for inspection according to the following:

a. Records of the annual tank truck tightness certification testing performed under 40 CFR 60.505(b) and 63.11092(f)(1)

b. The documentation file shall be kept up-to-date for each gasoline cargo tank loading at the facility. The documentation of each test shall include, as a minimum, the information in (1) through (8) below:

(1) Name of test (e.g. Annual Certification Test- Method 27)

(2) Cargo tank owner's name and address

(3) Cargo tank identification number

(4) Test location and date

(5) Tester name and signature

(6) Witnessing inspector, if any: Name, signature, and affiliation.

(7) Vapor tightness repair: Nature of repair work and when performed in relation to vapor tightness testing

(8) Test results: Test pressure; pressure or vacuum change, mm of water; time period of test; number of leaks found with instrument; and leak definition.

c. As an alternative to keeping records of each gasoline cargo tank test at the terminal, as required in (a) and (b) above, the permittee may comply with either of the following:

(1) Keep an instantly available electronic copy of each record available at the terminal. The copy of each record must be an exact duplicate image of the original paper record with certifying signatures. MDEQ must be notified in writing that the terminal is in compliance with this alternative; or

(2) For facilities that use a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection during the course of a site visit, or within a mutually agreeable time frame.

Note: The copy of each record must be an exact duplicate image of the original paper record with certifying signatures. DEQ must be notified in writing that the terminal is in compliance with this alternative.

(Ref.: 40 CFR 60.505(a-b), 40 CFR 60.505(e), Subpart XX and 40 CFR 63.11088(f), 40 CFR 63.11094(b-c), Subpart BBBBBB)

5.5 For Emission Points AA-005, AA-008, and AA-025, a record of each monthly leak inspection shall be kept on file at the terminal for at least 2 years. Inspection records shall include, as a minimum, the following information:

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 fifteen (15) days).

e. Inspector name and signature.

(Ref.: 40 CFR 60.505(c), Subpart XX)

5.6 For Emission Points AA-005, AA-008, and AA-025, the permittee shall keep documentation of all notifications required by Condition 4.2(d) on file at the terminal for at least two (2) years.

(Ref.: 40 CFR 60.505(d), Subpart XX)

5.7 For Emission Points AA-005, AA-008, and AA-025, where a thermal oxidation system other than a flare is used and as an alternative to paragraph (b)(1)(iii)(A) of 40 CFR 63.11092, the permittee shall meet the requirements below

a. The presence of a thermal oxidation system pilot flame shall be monitored using a heat-sensing device, such as an ultraviolet beam sensor or a thermocouple, installed in proximity of the pilot light, to indicate the presence of a flame. The heat-sensing device shall send a positive parameter value to indicate that the pilot flame is on, or a negative parameter value to indicate that the pilot flame is off.

b. Develop, submit to DEQ and maintain onsite a monitoring and inspection plan that describes the owner or operator's approach for meeting the requirements below:

(1) The thermal oxidation system shall be equipped to automatically prevent gasoline loading operations from beginning at any time that the pilot flame is absent.

(2) The owner or operator shall verify, during each day of operation of the loading rack, the proper operation of the assist-air blower and the vapor line valve. Verification shall be through visual observation, or through an automated alarm or shutdown system that monitors system operation. A manual or electronic record of the start and end of a shutdown event may be used.

(3) The owner or operator shall perform semi-annual preventive maintenance inspections of the thermal oxidation system, including the automated alarm or shutdown system for those units so equipped, according to the recommendations of the manufacturer of the system.

(4) The monitoring plan shall specify conditions that would be considered malfunctions of the thermal oxidation system during the inspections or automated monitoring performed under paragraphs (2) and (3) above, describe specific corrective actions that will be taken to correct any malfunction, and define what the owner or operator would consider to be a timely repair for each potential malfunction.

(5) The owner or operator shall document any system malfunction, as defined in the monitoring and inspection plan, and any activation of the automated alarm or shutdown system with a written entry into a log book or other permanent form of record. Such record shall also include a description of the corrective action taken and whether such corrective actions were taken in a timely manner, as defined in the monitoring and inspection plan, as well as an estimate of the amount of gasoline loaded during the period of the malfunction.

(Ref.: 40 CFR 63.11092(b)(1)(iii), Subpart BBBBBB)

SECTION 6
REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
AA-000	40 CFR 63.11087(e), 40 CFR 63.11088(f), 40 CFR 63.11095(a) & (d), Subpart BBBBBB	6.1	Semi-annual report requirement
	40 CFR 63.11087(e), 40 CFR 63.11088(f), and 40 CFR 63.11095(b), Subpart BBBBBB	6.2	Semi-annual report requirement
	40 CFR 63.11093(a), Subpart BBBBBB	6.3	Initial Notifications
	40 CFR 63.11093(b), Subpart BBBBBB	6.4	Notification of Compliance Status
AA-008	40 CFR 63.11093(c), Subpart BBBBBB	6.5	Notification of Performance Test

6.1. For Emission Points AA-000, the permittee shall submit shall submit a certified semi-annual synthetic minor monitoring report postmarked no later than 31st of January and 31st of July for the preceding six months with the following information:

a. The facility-wide throughput of each product for each month on 12-month rolling basis.

b. For loading racks, each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility.

c. For equipment leak inspections, the number of equipment leaks not repaired within 15 days after detection

d. The number, duration, and a brief description of each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded; a description of actions taken during the malfunction to minimize emissions in accordance with 40 CFR 63.11085(a); and actions taken to correct the malfunction.

(Ref.: 40 CFR 63.11087(e), 40 CFR 63.11088(f), 40 CFR 63.11095(a) and (d), Subpart BBBBBB)

6.2. For Emission Point AA-000, the permittee shall submit an excess emissions report along with the semiannual compliance report required in Condition 6.1. Excess emissions events and the information to be included in the excess emissions report are specified in paragraphs (a) through (e) below:

a. Each exceedance or failure to maintain, as appropriate, the monitored operating parameter value determined in accordance with Condition 5.7. The report shall include the monitoring data for the days on which exceedances or failures to maintain have occurred, and a description and timing of the steps taken to repair or perform maintenance on the vapor collection and processing systems or the CMS.

b. Each instance in which malfunctions discovered during the monitoring and inspections required by Condition 5.7(b) were not resolved according to the necessary corrective actions described in the monitoring and inspection plan. The report shall include a description of the malfunction and the timing of the steps taken to correct the malfunction.

c. 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:

(1) The date on which the leak was detected;

(2) The date of each attempt to repair the leak;

(3) The reasons for the delay of repair;

(4) The date of successful repair

d. Each instance of a non-vapor-tight gasoline cargo tank loading at the facility in which the owner or operator failed to take steps to assure that such cargo tank would not be reloaded at the facility before vapor tightness documentation for that cargo tank was obtained.

e. Each reloading of a non-vapor-tight gasoline cargo tank at the facility before vapor tightness documentation for that cargo tank is obtained by the facility in accordance with 40 CFR 63.11094(b).

(Ref.: 40 CFR 63.11087(e), 40 CFR 63.11088(f), and 40 CFR 63.11095(b), Subpart BBBBBB)

6.3. For Emission Points AA-000, the permittee shall submit an Initial Notification as specified in 40 CFR 63.9(b) within 120 days after permit issuance. If the permittee is in compliance with the requirements of 40 CFR Part 63, Subpart BBBBBB at the time of the Initial Notification is due, the Notification of Compliance Status required in Condition 6.4 may be submitted in lieu of the Initial Notification.

(Ref.: 40 CFR 63.11087(f) and 40 CFR 63.11093(a) and Table 3, Subpart BBBBBB)

6.4. For Emission Point AA-000, the permittee shall submit a Notification of Compliance Status as specified in 40 CFR Part 63.9(h).

(Ref.: 40 CFR 63.11093(b) and Table 3, Subpart BBBBBB)

6.5. For Emission Point AA-008, the permittee shall submit a Notification of Performance Test as specified in 40 CFR Part 63.9(e) at least 60 days prior to initiating testing required in Condition 5.2.

(Ref.: 40 CFR 63.11093(c), Subpart BBBBBB)