



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

Ms. Lynn Dewald
Environmental Specialist
Entergy Nuclear Palisades
27780 Blue Star Memorial Highway
Covert, Michigan 49043

RE: Request for Applicability Determination
Palisades Nuclear Station, Covert, Michigan

Dear Ms. Dewald:

The U.S. Environmental Protection Agency (EPA) has received and reviewed a request from Entergy Nuclear Palisades regarding Palisades Nuclear Station (the Station) in Covert, Michigan. The request, emailed December 14, 2020, and supplemented by letter December 15, 2020, and December 23, 2020, seeks a determination of the applicability of 40 C.F.R. Part 63, Subpart CCCCCC, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Category: Gasoline Dispensing Facilities (the Subpart CCCCCC Rule) to two 500-gallon gasoline tanks and one 500-gallon diesel tank at the Station. For the reasons discussed below, EPA has determined that the Subpart CCCCCC Rule applies to the two 500-gallon gasoline tanks and does not apply to the 500-gallon diesel tank.

Entergy Nuclear Palisades' Request

Entergy Nuclear Palisades requests a determination of the applicability of the Subpart CCCCCC rule to two 500-gallon gasoline tanks and one 500-gallon diesel tank. The company states that the three tanks were identified as part of a third-party audit of the Station's safety, health, and environmental program. Entergy Nuclear Palisades states that the three tanks are not currently included in the Station's operating permit and that the gasoline and diesel tanks are used solely to fuel company vehicles.

Analysis

Pursuant to 40 C.F.R. § 63.11111, the affected source to which the Subpart CCCCCC Rule applies is each gasoline dispensing facility (GDF) that is located at an area source. The affected source includes each gasoline cargo tank during the delivery of product to a GDF and each storage tank.

Terms used in the Subpart CCCCCC Rule are defined in either the Clean Air Act (CAA) or 40 C.F.R. Part 63 Subparts A, BBBBBB, or CCCCCC. For the purpose of the Subpart CCCCCC Rule, definitions in 40 C.F.R. § 63.11132 supersede definitions in other parts or subparts. Relevant statutory and regulatory definitions that must be considered as part of this determination are included below.

- Pursuant to 40 C.F.R. § 63.2, *major source* means any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants, unless the Administrator establishes a lesser quantity, or in the case of radionuclides, different criteria from those specified in this sentence.
- Pursuant to 40 C.F.R. § 63.2, *area source* means any stationary source of hazardous air pollutants that is not a major source as defined in 40 C.F.R. Part 63.
- Pursuant to 40 C.F.R. § 63.11100, *gasoline storage tank or vessel* means each tank, vessel, reservoir, or container used for the storage of gasoline, but does not include (1) frames, housing, auxiliary supports, or other components that are not directly involved in the containment of gasoline or gasoline vapors; (2) subsurface caverns or porous rock reservoirs; (3) oil/water separators and sumps, including butane blending sample recovery tanks, used to collect drained material such that it can be pumped to storage or back into a process; or (4) tanks or vessels permanently attached to mobile sources such as trucks, railcars, barges, or ships.
- Pursuant to 40 C.F.R. § 63.11132, *gasoline* means any petroleum distillate or petroleum distillate/alcohol blend having a Reid vapor pressure of 27.6 kilopascals or greater, which is used as fuel for internal combustion engines.
- Pursuant to 40 C.F.R. § 63.11132, *gasoline dispensing facility (GDF)* means any stationary facility which dispenses gasoline into the fuel tank of a motor vehicle, motor vehicle engine, nonroad vehicle, or nonroad engine, including a nonroad vehicle or nonroad engine used solely for competition. These facilities include, but are not limited to, facilities that dispense gasoline into on- and off-road, street, or highway motor vehicles, lawn equipment, boats, test engines, landscaping equipment, generators, pumps, and other gasoline-fueled engines and equipment.
- Pursuant to 40 C.F.R. § 63.11132, *motor vehicle* means any self-propelled vehicle designed for transporting persons or property on a street or highway.

Entergy Power Palisades states that the Station is an area source of hazardous air pollutants (HAPs). Further, the Michigan Department of Environment, Great Lakes, and Energy (EGLE) determined as part of the Station's Title V operating permit renewal decision¹ that the Station has the potential to emit less than 10 tons per year of any single HAP and less than 25 tons per year

¹ See the Renewable Operating Permit Staff Report dated November 5, 2018 for permit MI-ROP-B2934-2019. Title V operating permits in Michigan are known as renewable operating permits.

of all HAPs combined. As a result, the Station is an area source of HAPs, not a major source, as defined at 40 C.F.R. § 63.2.

In its request, Entergy Power Palisades states that gasoline from the two 500-gallon gasoline storage tanks are used solely to fuel company vehicles. The gasoline storage tanks are permanently mounted in a 2,046-gallon capacity concrete secondary containment berm that is covered on three sides and by a roof. Gasoline from each tank is pumped directly from each tank into the vehicles via hand-held dispenser. Thus, a gasoline dispensing facility as defined at 40 C.F.R. § 63.11132 is located at the Station and the gasoline from the tanks is used in either a motor vehicle as defined at 40 C.F.R. § 63.11132, a motor vehicle engine, a nonroad vehicle, or a nonroad engine. Since the fuel is used in an internal combustion engine, each tank stores gasoline as defined at 40 C.F.R. § 63.11132. Therefore, the two 500-gallon gasoline storage tanks are gasoline storage tanks as defined at 40 C.F.R. § 63.11100. Since the gasoline storage tanks are part of a gasoline dispensing facility located at an area source of HAPs, each of the two gasoline storage tanks is an affected source to which the Subpart CCCCCC rule applies pursuant to 40 C.F.R. §63.11111(a).

Entergy Power Palisades further states in its request that there is a 500-gallon diesel storage tank at the Station. The 500-gallon diesel storage tank is not a gasoline storage tank because the tank stores diesel, not gasoline. Therefore, pursuant to 40 C.F.R. § 63.11111(a), the 500-gallon diesel storage tank is not an affected source to which the Subpart CCCCCC rule applies. Please note that the applicability of the Subpart CCCCCC rule to the 500-gallon diesel storage tank may be affected if the tank is used to store gasoline.

Although not a part of this Subpart CCCCCC Rule applicability determination request, Entergy Power Palisades further requested air permit recommendations. We note that air permit decisions in Michigan are made on a case-by-case basis by EGLE, Michigan's air permitting authority. We recommend that you contact EGLE with questions about the air permitting process.

If you have further questions, please contact Michael Langman of my staff at (312) 886-6867.

Sincerely,

2/2/2021

X Douglas Aburano

Douglas Aburano
Acting Air Programs Branch Chief
Signed by: DOUGLAS ABURANO

Douglas Aburano, Chief
Acting Air Programs Branch