

4/2/15

John Legg
4/2/15

NON-CONFIDENTIAL
ENTIRE DOCUMENT

To: File
From: John Legg
Date: April 2, 2015

Id. No. _____ Reg. _____
Company _____
Facility _____ Region 4
Initials jc legg

Subj: R13-1999F - Class I Administrative Update
Marathon Petroleum Company LP (MPC)
Charleston Light Products Terminal
204 Ferry Street, Charleston, Kanawha County, WV 25314
Plant ID No.: 039-00009; Permit ID No.: R13-1999F

On February 20, 2015, MPC submitted to the DAQ, a Class I Administrative Update to broaden "the tank content description" for the four (4) largest storage tanks permitted in R13-1999E.

The "tank content description" for these tanks was changed:

to: "Conventional /Motor Gasoline/Fuel Ethanol"
from: "Conventional/Motor Gasoline."

These tanks are listed in Table 1 below. The changes made to old permit R13-1999E to arrived at new permit R13-199F are highlighted in RED in the compare file which is attached to this memo.

Also, included in the application was a Material Safety Data Sheet (MSDS) for "Fuel Ethanol" and Tanks 4.09 emission calculation reports documenting that the storage of "Fuel Ethanol" instead of "Gasoline" results in emissions reductions.

Note that: MPC did not request that the VOC emissions reductions from storing "Fuel Ethanol" (instead of gasoline) be factored into permit limits (to make the limits more conservative). These reduces are given in Table 1 below for informational purposes only.

| Table 1: Total VOC Emissions (lb VOC) based on MPC's 2014 Rolling Throughputs. Emissions Calculated by the Computer Program Tanks 4.09. | | | | | | |
|---|------------------|-------------------|-----------------------------|--------------------|-----------------|------------------------|
| MPC ID | Emission Unit ID | Emission Point ID | Tank Storage Capacity (gal) | VOC Emissions (lb) | | |
| | | | | Gasoline Service | Ethanol Service | Difference (Reduction) |
| 40-1 | A-1 | 013 | 1,830,940 | 1,156.02 | 76.05 | (1,079.97) |
| 48-2 | A-2 | 07 | 2,066,610 | 2,162.04 | 286.54 | (1,875.50) |
| 12-30 | A-30 | 04 | 521,119 | 2,411.14 | 175.30 | (2,235.84) |
| 16-31 | A-31 | 014 | 678,586 | 2,885.09 | 170.11 | (2,714.98) |

WordPerfect Document Compare Summary

Original document: Q:\AIR_QUALITY\J_LEGG\Marathon previously
ExxonMobil\R13-1999F\039-00009_PERM_13-1999E.wpd

Revised document: @PFDesktop\MyComputer\Q:\AIR_QUALITY\J_LEGG\Marathon
previously ExxonMobil\R13-1999F\039-00009_PERM_13-1999F.wpd

Deletions are shown with the following attributes and color:

~~Strikeout~~, **Blue** RGB(0,0,255).

Deleted text is shown as full text.

Insertions are shown with the following attributes and color:

Double Underline, **Redline**, **Red** RGB(255,0,0).

The document was marked with 33 Deletions, 44 Insertions, 0 Moves.

West Virginia Department of Environmental Protection

*Earl Ray Tomblin
Governor*

Division of Air Quality

*Randy C. Huffman
Cabinet Secretary*

Class HI Administrative Update Permit



R13-1999EF

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45 C.S.R. 13 — Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the facility listed below is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:
Marathon Petroleum Company
Charleston
039-00009

*John A William F. Benedict Durham
Director*

Issued: ~~March 16~~ April 2, 2012 • Effective: ~~March 16~~ April 2, 2012

This permit will supercede and replace Permit ~~R13-1999D issued October 11, 2001~~ R13-1999E.

Facility Location: Charleston, Kanawha County, West Virginia
Mailing Address: 539 South Main Street; Findlay, OH 45840
Facility Description: Bulk ~~Gasoline~~ Petroleum Terminal
NAICS Codes: 424710 - Petroleum Bulk Stations and Terminals
UTM Coordinates: 579.50 km Easting • 4231.17 km Northing • Zone 17
Permit Type: Class HI Administrative Update

Description of Change:

~~Changed the fugitive emissions limit from 0.13 tpy to 2.44 tpy based on the updated fugitive emission point count and changed the total VOC emissions of the facility from 20.38 lb/hr and 89.29 tpy to 20.91 lb/hr and 91.60 tpy.~~ Permit revised to include “ethanol” in addition to “gasoline” for the following tanks:

| <u>MPC ID</u> | <u>Emission Unit ID</u> | <u>Emission Point ID</u> |
|---------------|-------------------------|--------------------------|
| <u>40-1</u> | <u>A-1</u> | <u>013</u> |
| <u>48-2</u> | <u>A-2</u> | <u>07</u> |
| <u>12-30</u> | <u>A-30</u> | <u>04</u> |
| <u>16-31</u> | <u>A-31</u> | <u>014</u> |

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

This permit does not affect 45CSR30 applicability, the source is a nonmajor source subject to 45CSR30.

1.0 Emission Units

| Emission Unit ID | Emission Point ID | Emission Unit-Description | Year Installed | Design-Capacity | Control Device |
|-------------------------------|-------------------|--|----------------|-------------------------|-------------------|
| A-1 <u>(MPC ID 40-1)</u> | 013 | Tank A-1 <u>(Internal Floating Roof)</u> | 1980 | 1,830,940 gallonsgal | n/a |
| A-2 <u>(MPC ID 48-2)</u> | 07 | Tank D-2 <u>(Internal Floating Roof)</u> | 1980 | 2,066,610 gallonsgal | n/a |
| A-30 <u>(MPC ID 12-30)</u> | 04 | Tank A-30 <u>(Internal Floating Roof)</u> | 1980 | 521,119 gallonsgal | n/a |
| A-31 <u>(MPC ID 16-31)</u> | 014 | Tank A-31 <u>(Internal Floating Roof)</u> | 1980 | 678,586 gallonsgal | n/a |
| A-6 | 05 | Interface Tank A-6 | 1980 | 19,748 gallonsgal | n/a |
| A-32 | 015 | Tank A-32 | 1980 | 279,441 gallonsgal | n/a |
| A-35 | 02 | Tank A-35 | 1960 | 423,755 gallonsgal | n/a |
| A-36 | 016 | Tank A-36 | 1960 | 170,203 gallonsgal | n/a |
| A-40 | 01 | Tank A-40 | 1982 | 1,271,967 gallonsgal | n/a |
| A-41 | 017 | Tank A-41 | 1980 | 10,353 gallonsgal | n/a |
| A-2061 | 06 | Tank A-2061 | 1980 | 10,353 gallonsgal | n/a |
| A-2064 | 018 | Tank A-2064 | 1980 | 10,353 gallonsgal | n/a |
| TBN-1 | n/a | TBN-1 | -- | 10,353 gallonsgal | n/a |
| TBN-2 | n/a | TBN-2 | -- | 10,353 gallonsgal | n/a |
| Vapor Recovery Unit/ Loading | 011 | Vapor Recovery Unit / Loading | 1996 | -- | Carbon Adsorption |
| Fugitives | 012 | Fugitives | n/a | n/a | n/a |
| Miscellaneous | n/a | Underground Storage Tank B-2 | -- | -- | n/a |
| Miscellaneous | n/a | Underground Storage Tank B-4 | -- | -- | n/a |
| Miscellaneous | n/a | Oil/Water Separator (OWS) | -- | -- | n/a |
| Miscellaneous | n/a | Oil Handling | -- | -- | n/a |

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Law W.Va. Code §§22-5-1 et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

2.4. Term and Renewal

- 2.4.1. This permit supercedes and replaces previously issued Permit R13-1999~~D~~E. This permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any applicable legislative rule.

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-1999F, R13-1999E, R13-1999D, R13-1999C, R13-1999B, R13-1999A, R13-1999, R13-0887, R13-1371, and R13-1444 and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and 13-10.3]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses and/or approvals from other agencies; i.e., local, state and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

4.1.1. Total yearly throughput for the storage tanks shall not exceed the following volumes in any calendar year. For the purposes of this permit, a calendar year is defined as beginning on January 1 and ending on December 31.

| MATERIAL | TANK NO. | TANK CAPACITY (Gallons) | THROUGHPUT (Gal/Yr) |
|--|-------------------|-------------------------|---------------------|
| Conventional /- Motor Gasoline/ <u>Fuel Ethanol</u> | A-1 | 1,830,940 | 335,000,000 |
| | A-2 | 2,066,610 | |
| | A-30 | 521,119 | |
| | A-31 | 678,586 | |
| Off-Specification Gasoline | A-6 | 19,748 | 480,000 |
| Aviation Gasoline | A-32 | 279,441 | 15,000,000 |
| Distillate | A-35 | 423,755 | 400,000,000 |
| | A-36 | 170,203 | |
| | A-40 | 1,271,967 | |
| Additive | A-41 (Horizontal) | 10,353 | 450,000 |
| | A-2061 | 10,353 | |
| | A-2064 | 10,353 | |
| | TBN-1 (1) | 10,353 | |
| | TBN-2 (1) | 10,353 | |
| (1) TBN-1 and TBN-2 to be constructed. TBN stands for To Be Named. | | | |

4.1.2. The Leak Detection Program as outlined in Appendix IV of permit application R13-1999 and Attachment K of permit application R13-1999E shall be adhered to.

4.1.3. The Accident Procedures as outlined in Appendix V of permit application R13-1999 shall be adhered to.

4.1.4. The Spill Prevention Control and Countermeasure Plan as outlined in Appendix V of permit

application no. R13-1999 shall be adhered to.

4.1.5. Maximum fill rates for the associated tanks shall not exceed the following rates at any time:

| MATERIAL | TANK NO. | FILL RATE (Gal/Min) |
|---|----------------------|---------------------|
| Conventional / Motor Gasoline/ <u>Fuel Ethanol</u> | A-1 | 3,150 |
| | A-2 | 3,150 |
| | A-30 | 3,150 |
| | A-31 | 3,150 |
| Off-Specification Gasoline | A-6 (Interface Tank) | 333 |
| Aviation Gasoline | A-32 | 3,150 |
| Distillate | A-35 | 3,150 |
| | A-36 | 3,150 |
| | A-40 | 3,150 |
| Additive | A-41 (Horizontal) | 167 |
| | A-2061 | 167 |
| | A-2064 | 120 |
| | TBN-1 | 167 |
| | TBN-2 | 167 |

4.1.6. The following VOC emissions limitations and applicable requirements shall be adhered to:

| Type of Operation | MATERIAL | EQUIPMENT ID | EMISSION POINT ID | CONTROL DEVICE/ APPLICABLE REQUIREMENT | VOC EMISSIONS | |
|--|--|--------------|-------------------|---|---------------|------|
| | | | | | pph | tpy |
| Storage/ Working and Breathing Losses | Conventional Gasoline/ <u>Mot or Gasoline/ Fuel Ethanol</u> | A-1 | 013 | 45CSR21 Sect. 28 | 1.68 | 7.37 |
| | | A-2 | 07 | 45CSR21 Sect. 28 | | |
| | | A-30 | 04 | 45CSR21 Sect. 28 | | |
| | | A-31 | 014 | 45CSR21 Sect. 28 | | |

application no. R13-1999 shall be adhered to.

4.1.5. Maximum fill rates for the associated tanks shall not exceed the following rates at any time:

| MATERIAL | TANK NO. | FILL RATE (Gal/Min) |
|---|----------------------|---------------------|
| Conventional / Motor Gasoline/ <u>Fuel Ethanol</u> | A-1 | 3,150 |
| | A-2 | 3,150 |
| | A-30 | 3,150 |
| | A-31 | 3,150 |
| Off-Specification Gasoline | A-6 (Interface Tank) | 333 |
| Aviation Gasoline | A-32 | 3,150 |
| Distillate | A-35 | 3,150 |
| | A-36 | 3,150 |
| | A-40 | 3,150 |
| Additive | A-41 (Horizontal) | 167 |
| | A-2061 | 167 |
| | A-2064 | 120 |
| | TBN-1 | 167 |
| | TBN-2 | 167 |

4.1.6. The following VOC emissions limitations and applicable requirements shall be adhered to:

| Type of Operation | MATERIAL | EQUIPMENT ID | EMISSION POINT ID | CONTROL DEVICE/ APPLICABLE REQUIREMENT | VOC EMISSIONS | |
|--|--|--------------|-------------------|---|---------------|------|
| | | | | | pph | tpy |
| Storage/ Working and Breathing Losses | Conventional Gasoline/ <u>Mot or Gasoline/ Fuel Ethanol</u> | A-1 | 013 | 45CSR21 Sect. 28 | 1.68 | 7.37 |
| | | A-2 | 07 | 45CSR21 Sect. 28 | | |
| | | A-30 | 04 | 45CSR21 Sect. 28 | | |
| | | A-31 | 014 | 45CSR21 Sect. 28 | | |