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west virginia department of environmental protection

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Division of Air Quality  
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Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
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**MEMORANDUM**

**To:** Beverly McKeone  
**From:** William T. Rothwell II  
**Date:** September 20, 2016  
**Subject:** Marathon Petroleum Co. – Neal Propane Cavern – Wayne County, WV  
**ID #:** 099-00118  
**APP #:** PD16-044

**BACKGROUND INFORMATION:**

Marathon Petroleum Co. is proposing to utilize an EPA Certified Tier 3, 95 HP emergency compression ignition (CI) reciprocating internal combustion engine (RICE) “fire pump engine” that would drive water pumps in the event of a fire emergency at the propane cavern.

The engine is a new source (constructed on or after June 12, 2006), located at an area source of HAPs, and is therefore subject to 40CFR63, Subpart ZZZZ (NESHAP). Due to the year of construction of the engine, it is subject to a substantive requirement of that Federal Rule in which it must comply with 40CFR60 Subpart IIII (NSPS) if applicable.

Since the certified engine is  $\leq 500$  HP and was manufactured after April 1, 2006, although subject to IIII, it is not subject to a substantive requirement in 40CFR60 Subpart IIII. The engine used in the proposed fire pump complies with Tier 3 emissions limit of U.S. EPA NSPS for stationary emergency engines under 40CFR60 Subpart IIII when tested per ISO 8178 D2.

The potential emissions for the engine are as follows:

<u>Pollutant</u>	<u>LB/HR</u>	<u>TPY</u>
PM <sub>10</sub>	0.02	0.01
VOCs	0.01	0.00
CO	0.15	0.04
NO <sub>x</sub>	0.53	0.13

**RECOMMENDATION:**

The emission rates are below the emission limits of six (6) lb/hr and ten (10) TPY; 2 lb/hr, or 5 TPY of HAPs set forth set forth in 45CSR13 - 2.17.a&b., and does not trigger a

substantive requirement of any State or Federal air quality regulation. Therefore, a permit is not required by this Division for the operation of the above mentioned fire pump engine.



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William T. Rothwell II, P.E.  
Engineer

9/20/2016

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Date