

Fact Sheet



For Final Reopening Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Reopening, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on January 29, 2010.

Permit Number: **R30-09900022-2010**
Application Received: **December 21, 2010**
Plant Identification Number: **099-00022**
Permittee: **Marathon Petroleum Company, LLC**
Facility Name: **MPC—Tri-State Terminal**
Mailing Address: **539 South Main Street, Findlay, Ohio 45840**

Permit Action Number: RE01 Revised: April 19, 2011

Physical Location: Kenova, Wayne County, West Virginia
UTM Coordinates: 361.56 km Easting • 4251.63 km Northing • Zone 17
Directions: From Charleston, travel I-64 West. Take the US-52 S exit, Exit 1, toward Kenova/Ceredo. Turn right onto WV-75 N. for 0.7 miles. Turn left onto US-60 W/Oak St. Continue to follow Oak St. for 0.7 miles. Turn right onto 23rd Street to the Tri-State Terminal.

Facility Description

The MPC—Tri-State Terminal is a bulk gasoline terminal covered by Standard Industrial Classification (SIC) 5171. The terminal receives gasoline and distillate by pipeline, stores it in nine (9) above ground storage tanks, and transfers the product out by pipeline. The terminal does not have truck, rail, or barge loading or unloading operations. The terminal also has two (2) wastewater tanks, a product recovery tank, and various insignificant activities.

The Division of Air Quality (DAQ) is reopening this Title V Operating Permit for MPC—Tri-State Terminal for cause to reincorporate 40CFR63 Subpart R, "National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)" conditions. The Title V permit renewal application received by the DAQ on October 26, 2009 stated that MPC—Tri-State Terminal (099-00022) was not a major source of HAPs, thus making it exempt from 40 C.F.R. Part 63, Subpart R. After additional review by the DAQ, it has been determined that MPC—Tri-State Terminal is, in fact, a major source of HAPs, and therefore continues to be subject to 40 C.F.R. Part 63, Subpart R.

Emissions Summary

No emissions changes are associated with this Reopening. However, with this reopening, MPC—Tri-State Terminal's emissions are combined with Kenova Terminal's Emissions (see discussion later in this Fact Sheet). The Title V Program Applicability Basis takes into account these combined emissions.

Title V Program Applicability Basis

With the proposed changes associated with this reopening, this combined facility maintains the potential to emit 11.68 TPY of Toluene, 11.68 TPY of Xylene, and 32.54 TPY of total HAPs. Due to this facility's potential to emit over 10 tons per year of a single HAP and over 25 tons per year of aggregate HAPs, Marathon Petroleum Company LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR30 40 C.F.R. Part 63, Subpart R	Operating permit requirement. Gasoline distribution facility requirements.
State Only:	45CSR42	Greenhouse Gas Emissions Inventory Program.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
NA		

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

Major Source of HAPs

MPC—Tri-State Terminal is adjacent to Marathon's Kenova Terminal (099-00100). Further, the facilities are under common control and contiguous. The combined HAP emissions for both facilities are above the major source threshold making these facilities subject to 40 C.F.R. Part 63, Subpart R. Since all of the diesel and gasoline from Tri-State is sent to Kenova Marine Terminal for barge loading, these facilities fit the support facility definition and are considered to be one source, not two, for PSD and Title V permitting as well.

The major source designation requires this facility to submit an emissions inventory nullifying the exemption granted in the permit renewal. Condition 3.1.10, which requires submission of an emissions inventory, was added with this reopening.

The major source designation also required the non-applicability section of the Permit Shield (Conditions 3.7.2.c. and f.) to be updated:

- 40 C.F.R. Part 63, Subpart R is, in fact, applicable to this facility. However, the loading rack and equipment leak standards are still not applicable; this facility does not load gasoline to gasoline cargo tanks (delivery tank trucks or railcars).
- 40 C.F.R. Part 63, Subpart EEEE still is not applicable. The storage tanks are not subject to this rule because gasoline, distillate, and wastewater are specifically excluded from the definition of organic liquid in 40 C.F.R. § 63.2406.

Reincorporation of 40 C.F.R. Part 63, Subpart R

The following references to 40 C.F.R. Part 63, Subpart R were reincorporated into this permit:

- Condition 3.1.8, which addresses the instrument program under 40 C.F.R. §63.424(f), was removed in the permit renewal. With this reopening, it was reincorporated.
- References to 40 C.F.R. Part 63, Subpart R were reincorporated into the citations for Conditions 4.2.4 and 4.5.4.
- References to 40 C.F.R. Part 63, Subpart R were added per Marathon's Request to the citations for Conditions 4.4.4, 4.5.3, and 4.5.5. The rationale for these additions is discussed later in this fact sheet.
- Conditions 4.1.5.b, 4.1.7.b, 4.2.4.b, and 4.5.4.b, which address external floating roofs, were reincorporated.
- Condition 4.1.7.a was also reincorporated. This language comes from 40 C.F.R. §63.423(a), which requires compliance with 40 C.F.R. §60.112b. The applicable requirements from 40 C.F.R. §60.112b are provided in Condition 4.1.5.
- Condition 4.2.5, which addresses recordkeeping and monitoring requirements was removed in the permit renewal. Since it references portions of 40 C.F.R. Part 63, Subpart R, it was reincorporated except for references to closed vent systems, which are not used by this facility.

Greenhouse Gas Reporting

Additionally, new boilerplate language for greenhouse gas reporting was added as conditions 3.1.9 and 3.5.10.

References to 40 CFR 63.427(c)

40 CFR §63.427(c) requires the tanks to comply with 40 CFR §60.116b. 40 CFR §63.427(c) reads:

"(c) Each owner or operator of gasoline storage vessels subject to the provisions of §63.423 shall comply with the monitoring requirements in §60.116b of this chapter, except records shall be kept for at least 5 years..."

Condition 4.4.4 contains requirements from 40 CFR §§60.116b(b) and (c), and Condition 4.4.5 contains the requirements of 40 CFR §60.116b(d). Since compliance with these requirements is also required by 40 CFR §63.427(c), this reference was added to these permit conditions.

Reference to 40 CFR 63.425(d)

40 CFR §63.425(d) requires the tanks to comply with 40 §CFR 60.113b. 40 CFR §63.425(d) reads:

"(d) The owner or operator each gasoline storage vessel subject to the provisions of §63.423 shall comply with §60.113b of this chapter...."

Condition 4.5.3 contains requirements from 40 CFR §60.113b(a)(5). Since compliance with this requirement is also required by 40 CFR §63.425(d), this reference was added to this permit condition.

Additional Changes

The following additional changes were made to this permit:

- Marathon states that tanks 204 and 251 have been permanently taken out of service; thus they were removed from this permit.
- Marathon has requested Conditions 3.5.5, 4.4.3, and 4.4.4 be revised to no longer specify copies of the records be kept on site. According to Marathon, their recordkeeping policy is that the Findlay, OH headquarters is the custodian of all official records, and records would be readily available from there.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

NA

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: March 3, 2010

Ending Date: April 4, 2010

All written comments should be addressed to the following individual and office:

Rex Compston
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The

Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Rex Compston
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.