

# Fact Sheet



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

Permit Number: **R30-07300002-2007**

Application Received: **June 15, 2007**

Plant Identification Number: **03-54-073-00002**

Permittee: **St. Marys Refining Company**

Mailing Address: **P. O. Box 392, 201 Barkwill Street, WV 26170**

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Physical Location:	St. Marys, Pleasants County, West Virginia
UTM Coordinates:	482.20 km Easting • 4359.41 km Northing • Zone 17
Directions:	From DAQ Headquarters go North on WV State Route 61 to I64/77 ramp go West toward Charleston on I64/77. Travel on I64/77 to the junction of I77/79. Then take I77 North to Pakersburg. Then go to Exit 179, which is the WV Route 2 North / WV Route 68 South Emerson Avenue Exit towards Vienna. Turn right onto WV Route 2. Take WV Route 2 North to St. Marys. From State Route 2 in St. Marys turn east on Court Lane and then turn right on Barkwill Street.

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## Facility Description

St. Marys Refining is a bulk gasoline and diesel terminal operations facility covered by (SIC) of 5171 and NAICS 424710. There are no secondary and tertiary codes for this facility. St. Marys Refining operates a loading rack for gasoline and diesel products which are loaded from and to or to and from tanker trucks or from barges. There are six (6) active tanks, three (3) tanks for standby service, and forty-three (43) inactive tanks. Tanks 250 and 500 have site remediation facilities that perform soil vapor extraction (SVE). This facility also operates a wastewater treatment unit that treat storm water and groundwater remediation. St. Marys Refining has chosen to deactivate the units utilized to refine crude petroleum. These units are the Crude Distillation unit (Group 001), Deresining unit (Group 002), Hydrofinisher unit (Group 003), and the Rerun Distillation unit (Group 004). If the company reactivates these units, it will pursue all the applicable air regulations to do so.

**Emissions Summary**

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2005 Actual Emissions</b>
Carbon Monoxide (CO)	0.02	0
Nitrogen Oxides (NO <sub>x</sub> )	0.08	0
Particulate Matter (PM <sub>10</sub> )	0.03	0
Total Particulate Matter (TSP)	0.03	0
Sulfur Dioxide (SO <sub>2</sub> )	0.018	0
Volatile Organic Compounds (VOC)	333.08	145.48
<i>PM<sub>10</sub> is a component of TSP.</i>		
<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2005 Actual Emissions</b>
Benzene	3.79	1.43
Cumene	0.01	0.001
Ethylbenzene	0.27	0.07
Hexane	5.07	1.54
Naphthalene	0.06	0.0
Toluene	4.75	0.91
Xylene (Isomers and Mixtures)	1.03	0.31
Total	14.98	6.331
<i>Some of the above HAPs may be counted as PM or VOCs.</i>		

**Title V Program Applicability Basis**

This facility has the potential to emit 333.08 tons per year of Volatile Organic Compounds (VOC). Due to this facility's potential to emit over 100 tons per year of VOC, St. Marys Refining Company 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.

40 C.F.R. §60.110a	Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced after May 18, 1978, and Prior to July 23, 1984.
40 C.F.R. §60.110b	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquids Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984.
40 C.F.R. Part 61	Asbestos inspection and removal
40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only: 45CSR4	No objectionable odors.

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, 45CSR15, 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> )
R13 – 0899 Permit for construction of Gasoline Storage Tank #89	November 12, 1986	
R30-07300002-2002	December 30, 2002	R13-2287A
		Issued: 10-28-2003
		Increase benzene and VOC emissions limits of 001-S
		R13-2322B
		Issued: 12-1-2005
		Combine R13-0400 and R13-2322A
		R30-07300002-2002 (MM01)
		Issued: 2-28-06
R13-2322B To combine of existing permits R13-0400 and R13-2322A	December 1, 2005	Incorporation of requirements from permits R13-2287A and R13-2322B.
		R13-2287B
		Issued: 9-5-2006
		Increased the BTEX and VOC discharge limits
		R30-07300002-2002 (MM02)
		Issued: 1-30-07
		Incorporation of requirements from permits R13-2287B.

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R30-07300002-2002 (MM01) Combined R13-2287A and R13-2322B	February 28, 2006	
R13-2287B To increase the BTEX and VOC discharge limits. Supersede R13-2287A.	September 5, 2006	
R30-07300002-2002 (MM02) Added R13-2287B	January 30, 2007	

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

The following changes to the December 30, 2002 Title V Permit and Fact Sheet were permits R13-2287A, R13-2287B, R30-07300002-2002 (MM01), R13-2322B, and R30-07300002-2002 (MM02). These changes are:

1. Permit R13-2287A increased the VOC and benzene emissions the for soil vapor extraction system.
2. Permit R13-2322B combined existing permits R13-0400 and R13-2322A.
3. R30-07300002-2002 (MM01) incorporates the requirements from permits R13-2287A and R13-2322B. These permits involve increases in VOC and benzene emissions for soil vapor extraction system (R13-2287A) and the modification of tank T503 to add new primary and secondary seals. The modification of Tank 503 was for the merging permits R13-0400 and R13-2322A into R13-2322B.
4. Permit R13-2287B replaced the existing remediation system that was composed of two separate Soil Vapor Extraction (SVE) units with the new system composed of a single unit S-1 (which vents to electric catalytic oxidizer C-1). The VOC's and Benzene emission limits were slightly increased as the result of more aggressive remediation schedule (taking into account the improved control device). The emission limitations and monitoring requirements for Toluene, Ethylbenzene, and Xylene were also added.
5. R30-07300002-2002 (MM02) incorporates the requirements of R13-2287B in the Title V permit.

### Non-Applicability Determinations

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

<b>40 C.F.R. Part 64</b>	The facility does not have any pollutant specific emissions units (PSEU) at this facility that satisfy all of the applicability criteria requirements of 40 CFR §64.2(a), i.e., that: 1) have pre-control regulated pollutant potential emissions (PTE) equal to or greater than the “major” threshold limits to be classified as a major source; 2) are subject to an emission limitation or standard and; 3) have a control device to achieve compliance with such emission limitation or standard. Therefore, the facility is not subject to the Compliance Assurance Monitoring (CAM) rule.
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### 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: July 18, 2007  
Ending Date: August 17, 2007

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

Wayne Green  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> 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

Wayne Green  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1258 • Fax: 304/926-0478

**Response to Comments (Statement of Basis)**

Not applicable.