

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on September 24, 2010.

Permit Number: **R30-09900100-2010**
Application Received: **January 6, 2011**
Plant Identification Number: **099-00100**
Permittee: **Marathon Petroleum Company LLC**
Facility Name: **Kenova Marine Terminal**
Mailing Address: **P.O. Box 83, Kenova, WV 25530**

Permit Action Number: *SM01* Revised: *August 16, 2011*

Physical Location: Kenova, Wayne County, West Virginia
UTM Coordinates: 361.32 km Easting • 4251.68 km Northing • Zone 17
Directions: From Charleston, travel I-64 West to the Ceredo/Kenova exit. Take Highway 75 North to Route 60 West. Turn right onto 21st Street, then left on Beech Street. Storage tank farm on left, second black top road to the right and through flood wall is the office and barge loading.

Facility Description

The Kenova Marine Terminal is a bulk gasoline terminal covered by Standard Industrial Classification (SIC) 4491. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day and fifty-two (52) weeks per year. The station consists of four (4) internal floating roof gasoline storage tanks, two (2) fixed cone roof #2 fuel oil storage tanks, and three (3) internal floating roof gasoline/#2 fuel oil/kerosene storage tanks. The station receives, ships and stores petroleum products via barges.

Marathon Petroleum Company (MPC) has submitted a significant modification application for the installation of a 22,800 barrel above ground storage tank (1S) for the storage of Bio-Diesel and/or Petroleum Hydrocarbon Distillates. The anticipated start-up date is March 1, 2012.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]	
Regulated Pollutants	Increase in Potential Emissions
Volatile Organic Compounds (VOC)	10.89

Hazardous Air Pollutants	Increase in Potential Emissions
Napthalene	0.01
Total HAPs	0.01

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 236.36 tons per year of VOCs and 14.5 tons per year each of Toluene and Xylene. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Marathon Petroleum Company's Kenova Marine Terminal 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:	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	
	45CSR21	VOC emissions.
	45CSR30	Operating permit requirement.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the 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 (if any)
R13-2277C	June 7, 2011	

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 .

Determinations and Justifications

This modification incorporated changes made in R13-2277C. R13-2277C uses the new NSR permit format, which uses a different numbering system. This required the citations in this Title V permit to be updated as follows:

Title V Permit Condition	Condition from Old Format	Condition from R13-2277C
4.1.2.	A.1. and A.2.	4.1.1. and 4.1.2.
4.4.1.	B.6.	4.4.6.
4.4.2.	B.5.	4.4.4.

Addition of Tank 1S required the following changes:

- Condition 4.1.6 was added to provide emission limitations for this tank.
- Condition 4.1.7 limits the tank to an annual throughput of 65,167,019 gallons, or 77 tank turnovers.
- Condition 4.1.8 was added to specify only biodiesel or #2 diesel to be stored in this tank.
- Condition 4.4.1 previously required records of the types of petroleum liquids stored in the tanks; the maximum true vapor pressure of the liquid as stored; and the results of the inspections as required in Section 4.2.1. With this permit revision, this condition now requires records for only tanks 270, 271, 272, and 1S. The facility is to maintain records of the volatile organic liquid stored, the period of storage, and the maximum true vapor pressure of the volatile organic liquid during the respected storage period.
- Conditions 4.5.5 and 4.5.6 were added to specify reporting requirements for Tank 1S.

In addition to changes related to Tank 1S, the following changes were made:

- Conditions 3.1.9 and 3.5.13, greenhouse gas requirements found in 45CSR§42, were removed.
- Citations to condition 4.1.1, 4.1.4, and 4.1.5 were updated to include references to R13-2277.
- Several emission limits in Condition 4.1.2 were rounded to the next highest decimal place (i.e. 0.005 would be changed to 0.01) with this modification to reflect changes made in R13-2277C.
- Condition 4.1.9 was added specifying proper operation and maintenance of air pollution control equipment. This condition incorporates Condition 4.1.10 of R13-2277C. Since Tanks 270, 271, and 272 are the only emission units in R13-2277C with control devices listed, this condition applies only to these tanks.
- Condition 4.4.4 was added requiring records of monitoring.
- Condition 4.4.5 was added requiring records of maintenance of air pollution control equipment. This condition incorporates Condition 4.4.2 of R13-2277C. Since Tanks 270, 271, and 272 are the only emission units in R13-2277C with air pollution control equipment listed, this condition applies only to these tanks.
- Condition 4.4.6 was added requiring records of malfunctions of air pollution control equipment. This condition incorporates Condition 4.4.3 of R13-2277C. Since Tanks 270, 271, and 272 are the only emission units in R13-2277C with air pollution control equipment listed, this condition applies only to these tanks.
- Condition 4.5.7 was added requiring reporting of each occurrence of excess emissions expected to last more than 7 days.

Non-Applicability Determinations

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

40 C.F.R. Part 60, Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. This subpart does not apply to the changes made with this modification. Tank 1S is greater than 39,890 gallons and will be storing a liquid with a maximum true vapor pressure less than 3.5 kPa. Thus, it is exempt per 40 CFR. § 60.110b(b).

40 C.F.R. Part 64: Compliance Assurance Monitoring. The changes made at this facility do not meet the applicability criteria in 40 CFR. § 64.2. Therefore, this facility is not subject to CAM.

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: June 29, 2011

Ending Date: July 29, 2011

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.