

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the original Fact Sheet corresponding with the issuance of the initial Title V operating permit issued on December 30, 2002.

Permit Number: **R30-07300002-2002**
Application Received: **October 2, 2006**
Plant Identification Number: **07300002**
Permittee: **St. Marys Refining Company**
Facility Name: **St. Marys Refining**
Mailing Address: **P.O. Box 392, 201 Barkwill Street, St. Marys, WV 26170**

Permit Action Number: MM02 Revised: January 30, 2007

Physical Location: St. Marys, Pleasants County, West Virginia
UTM Coordinates: 482.20 km Easting • 4359.41 km Northing • Zone 17
Directions: Traveling from Parkersburg to St. Marys on State Route 2, turn onto Court Lane. Stay on Court Lane to the intersection of Barkwill St. Then turn right onto Barkwill St. and the main entrance is straight ahead.

Facility Description

St. Marys Refining is a bulk gasoline and diesel terminal operations with a primary Standard Industrial Code (SIC) of 5171.

The changes associated with this modification involve the incorporation of updated permit conditions from permit R13-2287B (class II administrative update) in order to speed up remediation process and meet USEPAs schedule for soil/groundwater remediation of the St. Marys Refinery site (the facility is under a RCRA consent order), and contains the following changes:

Replacement of the existing remediation system composed of two separate Soil Vapor Extraction (SVE) units (one of which vented to a 95% efficient thermal oxidizer, and the other one vented to

the atmosphere), with the new system composed of a single unit S-1 (which vents to a 99% efficient electric catalytic oxidizer C-1).

Slightly increased VOC's and Benzene emission limits as the result of more aggressive remediation schedule (taking into account the improved control device).

Added emission limitations and monitoring requirements for Toluene, Ethylbenzene and Xylene.

Emissions Summary

The emissions increases:

Pollutant	PTE increase, TPY
Volatile Organic Compounds (VOC)	6.218
Benzene	0.042
Toulene	0.185
Ethylbenzene	0.054
Xylenes	0.138

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of VOC. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, 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.

The changes associated with this permit modification have been found to be subject to the following applicable rules:

Federal and State: 45CSR13 Construction/Modification permit requirements
 45CSR30 Operating permit requirement.

State Only: N/A

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 (if any)
R13-2287B	September 5, 2006	
USEPA RCRA-III-266	April 22, 1997	

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 (Table B)," which may be downloaded from DAQ's website.

Determinations and Justifications

45CSR6 - Oxidation (or combustion) process in the new electric catalytic oxidizer (C-1) takes place at much lower temperature than in former thermal oxidizer (500-700 °F):

VOC's + O₂ + Platinum Group Metals Catalyst + Heat --> H₂O + CO₂ + Platinum Group Metals Catalyst + Heat release

This oxidation process can be defined as "slow combustion". Although, the catalytic oxidizer in this case is electric, it can still be considered as "thermal oxidizer" since it is using and producing heat. Therefore, it is subject to the requirements of 45CSR6.

In accordance with 45CSR§6-4.1. formula (Requirement 6.1.8.) PM emissions from the electric catalytic oxidizer C-1 should not exceed the following limit:

PM Emissions (lb/hr) = F x Incinerator Capacity (tons/hr) = 5.43 x (13,428 lbs/hr /2000 lbs/ton) =36.5 lb/hr

Where Incinerator Capacity (tons/hr) = 3000 cfm x 0.0746 lb/cf (refuse density) x 60 min/hr = 13,428 lbs/hr.

The oxidizer PM emissions are negligible, therefore it will be in compliance with this limit.

Non-Applicability Determinations

None

Request for Variances or Alternatives

None

Insignificant Activities

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

Comment Period

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

Natalya Chertkovsky
Engineer, Permitting
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

Natalya Chertkovsky
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1220 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.