

Fact Sheet



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

Permit Number: **R30-09900022-2015**
Application Received: **July 28, 2014**
Plant Identification Numbers: **099-00022/ 099-00100**
Permittee: **Marathon Petroleum Company LP**
Facility Name: **Kenova-TriState Terminal**
Mailing Address: **539 South Main Street, Findlay, Ohio 45840**

Revised: N/A

Physical Location: Kenova, Wayne County, West Virginia
UTM Coordinates: 361.323 km Easting • 4251.68 km Northing • Zone 17
Directions: From Charleston, travel I-64 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 Marathon Petroleum Company LP's Kenova-TriState Terminal is a bulk gasoline terminal covered by Standard Industrial Classification (SIC) 5171 and 4491. Previously, this facility was permitted under two Title V permits, one for the Kenova Terminal (099-00100) and one for the Tri-State Terminal (099-00022). The terminals were treated as a single source for Clean Air Act permitting purposes. With this renewal, Marathon Petroleum Company LP has requested that the two permits be combined. Also, with this renewal one (1) water pump engine and two (2) emergency generators are included in this permit.

Tri-State Terminal receives gasoline and distillate by pipeline, stores it in seven (7) 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 one (1) wastewater tank, and various insignificant activities.

Kenova Terminal consists of four (4) internal floating roof gasoline storage tanks, two (2) fixed cone roof #2 fuel oil storage tanks, three (3) internal floating roof gasoline/#2 fuel oil/kerosene storage tanks, and one

(1) Bio-Diesel and/or Petroleum Hydrocarbon Distillates storage tank. The station ships petroleum products via barge and/or pipeline.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2013 Actual Emissions
Carbon Monoxide (CO)	1.37	0.00
Nitrogen Oxides (NO _x)	4.06	0.00
Particulate Matter (PM _{2.5})	0.23	0.00
Particulate Matter (PM ₁₀)	0.25	0.00
Total Particulate Matter (TSP)	0.30	0.00
Sulfur Dioxide (SO ₂)	0.15	0.00
Volatile Organic Compounds (VOC)	432.3	51.64

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2013 Actual Emissions
Benzene	3.53	0.32
Ethylbenzene	0.57	0.04
Hexane	6.85	0.57
Toluene	5.53	0.50
Trimethylpentane (2, 2, 4)	3.63	0.28
Xylene	2.78	0.30
Napthalene	0.10	0.05
Total HAPs	23.3	2.06

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

Title V Program Applicability Basis

This facility has the potential to emit 432.3 TPY of VOCs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Marathon Petroleum Company LP 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 45CSR11 45CSR13 45CSR16 45CSR§§21-5, 27, 28 WV Code § 22-5-4 (a) (14) 45CSR30 45CSR34 40 C.F.R. Part 60, Subpart Kb 40 C.F.R. Part 60, Subpart JJJJ 40 C.F.R. Part 61 40 C.F.R. Part 63, Subpart R 40 C.F.R. Part 63, Subpart Y 40 C.F.R. Part 63, Subpart ZZZZ 40 C.F.R. Part 82, Subpart F	Open burning prohibited Standby plans for emergency episodes NSR permits Standards of Performance for New Stationary Sources pursuant to 40 C.F.R. Part 60 Internal/external floating roof storage tank requirements The Secretary can request any pertinent information such as annual emission inventory reporting Operating permit requirement HAP emission standards Requirements for volatile organic liquid storage vessels SI NSPS Asbestos inspection and removal Gasoline distribution facility requirements Marine Tank Vessel Loading Operations requirements RICE MACT Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

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 (<i>if any</i>)
R13-1352A	March 26, 2007	
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 in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

Combining Of Permits

Marathon Petroleum Company LP (MPC) owns and operates two adjacent bulk gasoline terminals in Kenova, WV: the Kenova Terminal and the Tri-State Terminal. The Kenova Terminal currently operates under West Virginia Permit to Operate R30-09900100-2010, effective October 8, 2010. The Tri-State Terminal operates under West Virginia Permit to Operate R30-09900022-2010, effective February 12, 2010. MPC is submitting this Title V application to combine both facilities under a single Title V Permit to Operate.

These two facilities have historically been considered a single source for determining permitting applicability and major source status for New Source Review (NSR) and Hazardous Air Pollutants (HAPs). The operations at the two facilities are similar, and a combined permit would streamline the reporting, recording keeping, and other compliance activities performed by MPC in accordance with the permit.

Existing permit conditions from the two previous permits were incorporated into this permit renewal as follows:

- Section 4.0 of R30-09900022-2010 contained requirements for Storage Tanks 251, 253, 256, 264, 265, 266, 267, and 268. Tank 251 has been removed from service, and the updated requirements of this section became Section 4.0 of this permit renewal. Note: Tank 202 is not included with this renewal since the permittee listed this source as an insignificant emission source.
- Section 4.0 of R30-09900100-2010 contained requirements for Tanks 257, 258, 259, 260, 261, 262, 270, 271, 272, and 1S. Tank 1S has been renamed Tank 273, and the updated requirements of this section became Section 5.0 of this permit renewal.
- Section 5.0 of R30-09900100-2010 contained MACT Subpart Y requirements for Barge Loading Stations 1-13. Subpart Y has been revised, and the permit requirements were revised accordingly. This facility now only has Barge Loading Stations 1-8, and the updated requirements of this section became Section 6.0 of this permit renewal.

“Once In, Always In” MACT Policy

The Kenova-TriState Terminal has historically been considered a major source of HAP emissions. Previously submitted calculations appeared to confirm this conclusion, showing highest individual potential HAP emissions and combined facility-wide potential HAP emissions exceeding their respective 10 and 25 tpy major source thresholds. However, these calculations employed a different HAP constituency in the gasoline vapor (e.g., assumed 7% xylene and 7% benzene in the vapor phase) than the one currently being used. Also, since the Kenova-TriState Terminal was a major source subject to 40 CFR 63, Subpart Y when the regulation was promulgated, MPC is required to achieve a 97% control efficiency for HAP from marine loading operations (during gasoline loading).

When accounting for this control efficiency and utilizing the gasoline vapor HAP composition factors included in Table 3.1 of the “Gasoline Distribution Industry (Stage I) - Background Information for Proposed Standards” January 1994 Report, HAP emissions at the Kenova-TriState Terminal does not exceed the applicable 10 and 25 TPY thresholds. Therefore, the facility is an area source.

40 C.F.R. 63, Subpart R applies to bulk gasoline terminals and pipeline breakout stations. Exemptions to this rule include facilities that are not major sources of HAP or facilities that are below the emissions screening factor thresholds as determined in 40 C.F.R. § 63.420(a)(1) for bulk gasoline terminals and 40 C.F.R. § 63.420(b)(1) for pipeline breakout stations. 40 C.F.R. 63, Subpart R was promulgated on December 14, 1994. Because 40 CFR 63, Subpart Y was promulgated on September 19, 1995 (first compliance date for major sources was September 19, 1999), the Kenova-TriState Terminal could not account for the control efficiency required under 40 C.F.R. 63, Subpart Y when initially assessing 40 C.F.R. 63, Subpart R applicability. The Kenova-TriState Terminal was therefore subject to subpart R at the time of its promulgation, and the terminal will remain subject to 40 C.F.R. 63, Subpart R based on US

EPA's "Once In, Always In" MACT policy. MPC is operating, and will continue to operate, the Kenova-TriState Terminal in accordance with the requirements of these rules.

40 CFR 63, Subpart ZZZZ (RICE MACT) Requirements

Engine #1, which was added with this permit renewal, is an emergency compression ignition (CI) engine rated below 500 hp. This engine was installed before June 12, 2006 at an area source of HAPs, therefore the following 40 CFR 63, Subpart ZZZZ requirements were added as section 7.0 of this permit:

- Condition 7.1.1 specifies oil change and inspection requirements as described in Table 2d to 40 CFR 63, Subpart ZZZZ, as specified in 40CFR§ 63.6603(a).
- Condition 7.1.2 provides fuel requirements, as specified in 40CFR§ 63.6604(b).
- Condition 7.1.3 requires the permittee to operate the engine after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop their own maintenance plan, as specified in 40CFR§ 63.6625(e).
- Condition 7.1.4 requires installation of a non-resettable hour meter, as specified in 40CFR§ 63.6625(f).
- Condition 7.1.5 requires minimization of idle time at startup, as specified in 40CFR§ 63.6625(h).
- Condition 7.1.6 details the optional oil analysis program, as specified in 40CFR§ 63.6625(i).
- Condition 7.1.7 requires demonstration of continuous compliance in accordance with 40CFR§§63.6605 and 6640(a), (b), (f)(1), (f)(2), and (f)(4).
- Condition 7.4.1 requires records to show continuous compliance, as specified in 40CFR§ 63.6655(d).
- Condition 7.4.2 requires records to demonstrate compliance with the maintenance plan, as specified in 40CFR§ 63.6655(e).
- Condition 7.4.3 requires records of the hours of operation for the engine recorded through the non-resettable hour meter, as specified in 40CFR§ 63.6655(f).

The following portions of 40 CFR 63, Subpart ZZZZ are not applicable to this facility:

- Recordkeeping requirements of 40CFR§ 63.6655(a): Engine #1 is not subject to any emission or operating limits (only work practice standards) therefore this does not apply.
- Annual reporting requirements of 40CFR§ 63.6650(h): Engine #1 does not operate or is contractually obligated to be available for more than 15 hours/year for the purposes specified in 40 CFR§§ 63.6640(f)(2)(ii) and (iii) or operates for the purposes specified in 40CFR§ 63.6640(f)(4)(ii), therefore this does not apply.

40 CFR 60, Subpart JJJJ Requirements

Engines #2 and #3, which were added with this permit renewal, are spark ignition (SI) engines fueled by propane and rated below 25 hp. These engines were installed after 2008, therefore the following 40 CFR 60, Subpart JJJJ requirements were added as section 8.0 of this permit:

- Conditions 8.1.1 and 8.1.2 identify which emission standards must be followed, as specified in 40CFR§§ 60.4231(a) and 4233(a).
- Condition 8.1.3 lists the general compliance requirements, as specified in 40CFR§ 60.4234.
- Condition 8.1.4 lists additional general compliance requirements for certified engines, as specified in 40CFR§§ 60.4243(a)(1).
- Condition 8.1.5 requires the permittee to comply with the general provisions of 40 CFR part 60, as specified in 40CFR§ 60.4246 and Table 3.
- According to 40CFR§63.6590(c), Engines #2 and #3 meet the requirements of 40 CFR 63, Subpart ZZZZ through compliance with 40 CFR 60, Subpart JJJJ. Condition 8.1.6 was added which states this.
- Condition 8.4.1 requires the permittee to keep records of all notifications, maintenance, and documentation that the engine meets emission standards, as specified in 40CFR§ 60.4245(a).

Non-Applicability Determinations

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

- a. 45 CSR 21, Section 22: Not applicable because Kenova and Tri-State Terminals do not have gasoline tank truck loading facilities.
- b. 45CSR21-27 & 28 - Not applicable to Tanks 202*, 255, 261, 262, and 273 per 45CSR§21-27.1.b.3-4 and 45CSR§21-28.1.b.3.
- c. 40 CFR 60, Subpart XX: Not subject because this facility does not have gasoline tank truck loading facilities.
- d. 40 CFR 60, Subpart Kb: Not applicable to Tanks 255, 261, 262, and 273 based on their date of construction, reconstruction, or modification per 40 C.F.R. § 60.110b(b).
- e. 40 CFR 61, Subpart BB: Not subject because the loading of gasoline and petroleum distillates are specifically exempted per 40 C.F.R. § 61.300(a).
- f. 40 CFR 63, Subpart R - Not applicable to Tanks 255, 261, 262, and 273, since these tanks do not store gasoline.
- g. 40 CFR 63, Subpart EEEE: Not applicable per 40 C.F.R. § 63.2406. The definition of organic liquid excludes gasoline, kerosene, and diesel.
- h. 40 CFR 63, Subpart BBBB: The Kenova-TriState Terminal is subject to 40 CFR 63, Subpart R and is not a pipeline pumping station or bulk gasoline plant. 40 CFR 63, Subpart BBBB does not apply to the Kenova-TriState Terminal.
- i. 40 CFR 63, Subpart DDDDD: Not applicable to hot oil heater for Tank 273, since the Kenova-TriState Terminal was not a major source of HAP when the heater was installed.
- j. 40 CFR 63, Subpart JJJJJ – Not applicable to hot oil heater for Tank 273, since process heater is exempt from the definition of boiler in 40 C.F.R. § 63.11237.
- k. 112(r) RMP – Regulated substances in gasoline, when in distribution or related storage for use as fuel for internal combustion engines, are exempt from the threshold determination per 40 C.F.R. § 68.115(b)(2)(ii).

*Note: Tank 202 is considered an insignificant emission source. It was included in this section upon request of the permittee.

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: February 4, 2015
Ending Date: March 6, 2015

Point of Contact

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

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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.

Response to Comments (Statement of Basis)

Not applicable.