

Fact Sheet



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

Permit Number: **R30-09900112-2024**
Application Received: **September 5, 2023**
Plant Identification Number: **099-00112**
Permittee: **MPLX Terminal and Storage LLC**
Facility Name: **Butane Storage**
Mailing Address: **P.O. Box 1492; Catlettsburg, KY 41129**

Physical Location: Kenova, Wayne County, West Virginia
UTM Coordinates: 360.647 km Easting • 4,247.173 km Northing • Zone 17
Directions: From I-64 East, take Exit 1 for US-52 S toward Kenova Ceredo. On US-52 S/W Virginia 75 E, turn right onto Co Hwy 1/16, turn left to stay on Co Hwy 1/16, turn left onto Novamount Rd, facility will be on the right.

Facility Description

This facility (SIC Code: 2869) and Catlettsburg Refining LLC's Catlettsburg Refinery are considered a single source for Clean Air Act permitting purposes. The Catlettsburg Refinery produces butane all year. During summer operation, the refinery produces an excess of butane which is transferred by pipeline and stored in the cavern until winter when there is a higher demand to blend it into gasoline. The cavern also has the ability to store butane delivered by railcar. Historically, butane from the refinery was stored at this facility in railcars and/or other butane caverns.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2023 Actual Emissions
Carbon Monoxide (CO)	0.00	0.00
Nitrogen Oxides (NO _x)	0.00	0.00
Particulate Matter (PM _{2.5})	0.04	0.03
Particulate Matter (PM ₁₀)	0.42	0.25
Total Particulate Matter (TSP)	1.6	0.93
Sulfur Dioxide (SO ₂)	0.00	0.00
Volatile Organic Compounds (VOC)	7.5	0.19
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2023 Actual Emissions
1,3-Butadiene	6 x 10 ⁻⁴	0.00
Benzene	1 x 10 ⁻³	0.00

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

Title V Program Applicability Basis

This facility and Catlettsburg Refining, LLC’s Catlettsburg Refinery are considered a single source for Clean Air Act permitting purposes. The combined facility has the potential to emit 336.6 TPY of PM₁₀, 600.0 TPY of SO₂, 2370.7 TPY of NO_x, 2930.9 TPY of CO, 1754.1 TPY of VOC, 16.9 TPY of Benzene, 14.3 TPY of Cumene and 55.4 TPY of total HAPs. Due to the combined facility’s potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP and over 25 tons per year of aggregate HAPs, MPLX Terminal and Storage 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.

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.
	45CSR16	NSPS
	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. Part 60, Subpart VVa	Equipment leaks in synthetics industry.
	40 C.F.R. Part 60, Subpart GGa	Equipment leaks in petroleum refineries.
	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.
	45CSR17	Fugitive particulate matter.

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>
None	N/A	

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

- ❖ There have been no equipment changes nor changes to the regulatory requirements at this facility since the issuance of R30-09900112-2019.
- ❖ Title V Boilerplate Changes:
 - **Condition 2.1.3** - The section of Rule 30 that defines Secretary changed in a previous version of Rule 30 and we failed to update this condition. Also, in the recently revised Rule 30, the word "such" was removed.
 - **Condition 2.11.4.** – The reference notation was changed from 45CSR§30-2.39 to 45CSR§30-2.40 because this definition was renumbered in 45CSR30.
 - **Condition 2.22.1.** - The reference notation was changed to delete 45CSR38 because it has been repealed.
 - **Condition 3.5.3.** - The EPA contact information and address were updated.
 - **Conditions 2.17, 3.5.7, and 3.5.8.a.1** - The section for Emergency was removed and replaced with “Reserved” in condition 2.17. Section 5.7 of Rule 30 which pertained to emergencies and affirmative defense was removed in the revised Rule 30.
 - **Condition 3.5.4** - Under the revised Rule 30, certified emissions statements are no longer required to be submitted. Facilities have been submitting their emissions data in SLEIS and paying fees based on their SLEIS submittal, so this requirement was no longer needed.
 - **Condition 3.5.8.a.2** - Under the revised Rule 30, "telefax" was replaced with "email".

Non-Applicability Determinations

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

- a. 45CSR7—This rule does not apply since this facility does not emit smoke, particulate matter, or other gaseous matter. Also, this facility does not meet the definition of a manufacturing process in 45CSR§7-2.20.
- b. 45CSR21—The only potentially applicable sections of this regulation are 45CSR§21-26 for Leaks from Petroleum Refinery Equipment and 45CSR§21-40 for Other Facilities that Emit Volatile Organic Compounds. The butane cavern does not meet the definition of a petroleum refinery in 45CSR§21-2.55, since this facility is not engaged in producing gasoline, kerosene, distillate fuel oils, residual fuel oils, lubricants, or other products through distillation of petroleum or through the redistillation, cracking, or reforming of unfinished petroleum derivatives; so 45CSR§21-26 does not apply. The butane cavern’s aggregate maximum theoretical VOC emissions are below 100 TPY, so 45CSR§21-40 does not apply.
- c. 45CSR27—This facility does not meet the definition of “chemical processing unit” in 45CSR§27-2.4 since the butane stored in the cavern is below 5% benzene by weight, thus this rule does not apply.
- d. 40 CFR Part 64 – The facility did not have any pollutant specific emissions units (PSEUs) that satisfied all of the applicability criteria requirements of 40 CFR §64.2(a). There have been no emission units added to this permit since the previous renewal was issued, so CAM remains not applicable to any emission unit listed in the renewal application.

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: April 17, 2024

Ending Date: May 17, 2024

Point of Contact

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

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41283 • Fax: 304/926-0478
Beena.j.modi@wv.gov

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)

(Choose) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.