

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 Fact Sheet corresponding with the Title V operating permit issued on September 22, 2020.

Permit Number: **R30-09900022-2020**
Application Received: **December 17, 2024**
Plant Identification Number: **03-54-099-00022**
Permittee: **MPLX Terminals LLC**
Facility Name: **Kenova-TriState Terminal**
Mailing Address: **539 South Main Street, Findlay, Ohio 45840**

Permit Action Number: *MM04* Revised: *July 18, 2025*

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

MPLX Terminals LLC'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 TriState Terminal (099-00022). The terminals were treated as a single source for Clean Air Act permitting purposes and in the 2015 renewal, the requirements for the two facilities were combined into one Title V permit.

TriState tank farm receives gasoline and distillate by pipeline, stores it in seven (7) above ground storage tanks, and transfers the product out by pipeline. The tank farm does not have truck, rail, or barge loading or unloading operations. The tank farm also has one (1) wastewater tank, and various insignificant activities.

Kenova marine dock, tank farm and butane truck unloading station consists of four (4) internal floating roof gasoline storage tanks, two (2) fixed cone roof distillate storage tanks, three (3) internal floating roof gasoline/distillate storage tanks, and one (1) Bio-Diesel and/or Petroleum Hydrocarbon Distillates storage tank. It also contains a butane truck unloading station, a gasoline butane blending operation, and a marine vapor combustion unit. The facility ships petroleum products via barge dock and pipeline export station.

Emissions Summary

This modification results in the following emission changes:

Pollutant	R13-2277F ⁽¹⁾ Emissions	R13-2277G ⁽¹⁾ Emissions	Change in Emissions (tpy)
CO	4.00	43.3	+39.30
NO _x	4.25	33.70	+29.50
PM _{2.5} /PM ₁₀	0.23	0.35	+0.11
PM	0.23	0.35	+0.11
SO ₂	0.01	0.05	+0.04
VOCs	439.7	439.7	0.00
Total HAPs	22.90	22.90	0.00

(1) Emissions taken from Engineering Evaluation/Fact Sheet R13-2277G.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 439.70 TPY of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, MPLX Terminals 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Control of Air Pollution from the Combustion of Refuse
	45CSR13	NSR Permits
	45CSR30	Operating permit requirement.
	45CSR34	Emissions Standards for Hazardous Air Pollutants

40 C.F.R. 63, Subpart Y

National Emission Standards for Marine Tank Vessel Loading Operations

State Only:

45CSR4

To Prevent and Control the Discharge of Air Pollutants in to the Air Which Causes or Contributes to an Objectionable Odor

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

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2277G	March 31, 2025	

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

This modification incorporates changes from R13-2277G (issued 03/31/2025). R13-2277G is for the installation of a backup marine vapor combustion unit (MVCU) to control emissions from the barge loading operations for gasoline loading during downtime for the existing vapor recovery unit (VRU).

1.1 Emission Units

- Added the marine vapor combustion unit (MVCU) to the Kenova Tank Farm section of the emission units table.

5.0 Kenova Storage Tanks

- Updated the citations of conditions 5.1.1, 5.1.3, 5.1.5, 5.1.6, 5.1.7, and 5.2.7.
- Updated condition 5.1.6.a to include the use of MVCU when the VRU is down.
- Updated condition 5.2.7 to reflect changes made in R13-2277G.
- Updated condition 5.4.4 to reflect changes made in R13-2277G.

6.0 MACT Subpart Y Requirements

- Added applicable Subpart Y requirements for the MVCU to conditions 6.1.1.b, 6.1.2.b, 6.2.1, 6.3.1, and 6.4.1.g.

11.0 Marine Vapor Combustion Unit

- Added Section 11.0 Marine Vapor Combustion Unit to incorporate the applicable requirements for emission unit MVCU from R13-2277G.

Non-Applicability Determinations

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

45CSR21 Section 40 - Control of air pollution from the emissions of volatile organic compounds

In accordance with 45CSR§21-40.1.4, sources regulated under Sections 11 through 39 of 45CSR21 (e.g., gasoline storage tanks), as well as barge loading facilities and fuel combustion sources (i.e., the hot oil heater and barge loading operations), can be excluded when comparing facility VOC emissions to the 100 TPY applicability threshold.

The total VOC emissions from the remaining sources (e.g., tanks exempt from the requirements of 45CSR§21-27 or 28, oily water sewage system, fugitive leaks, etc.) do not exceed 100 TPY.

Additionally, under 45CSR21 - 40.1.4., the requirements of this section 40. shall not apply to . . . fuel combustion units, barge loading facilities...

Therefore, 45CSR§21-40 does not apply to the marine vapor combustion unit (MVCU).

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:	Not Applicable for minor modifications.
Ending Date:	N/A

Point of Contact

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

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41286
Robert.A.Mullins@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)

Not applicable.