

Fact Sheet



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

Permit Number: **R30-09900022-2025**
Application Received: **March 20, 2025**
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**

Physical Location:	Kenova, Wayne County, West Virginia
UTM Coordinates:	361.323 km Easting • 4251.58 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.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2024 Actual Emissions
Carbon Monoxide (CO)	43.30	None Reported
Nitrogen Oxides (NO _x)	33.70	None Reported
Particulate Matter (PM _{2.5})	0.35	None Reported
Particulate Matter (PM ₁₀)	0.35	None Reported
Total Particulate Matter (TSP)	0.35	None Reported
Sulfur Dioxide (SO ₂)	0.05	None Reported
Volatile Organic Compounds (VOC)	439.70	145.69

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2024 Actual Emissions
Benzene	3.40	1.16
Hexane	6.50	2.07
Toluene	5.30	1.72
Trimethylpentane (2,2,4)	3.50	1.03
Xylene	2.70	0.75
Other HAPs	1.5	0.20
Total HAPs	22.90	6.93

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

Title V Program Applicability Basis

This facility has the potential to emit 439.7 tons per year 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers
	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	NSR permits

	45CSR16	Standards of Performance for New Stationary Sources
	45CSR21	Control of Air Pollution From the Emission of Volatile Organic Compounds
	WV Code § 22-5-4 (a) (15)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants
	40 C.F.R. 60, Subpart Kb	Requirements for Volatile Organic Liquid Storage Vessels
	40 C.F.R. 60, Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
	40 C.F.R. Part 61, Subpart M	Asbestos inspection and removal
	40 C.F.R. 63, Subpart R	National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)
	40 C.F.R. 63, Subpart Y	National Emission Standards for Marine Tank Vessel Loading Operations
	40 C.F.R. 63, Subpart EEEE	National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)
	40 C.F.R. 63, Subpart ZZZZ	RICE MACT
	40 C.F.R. 63, Subpart DDDDD	Boiler MACT
	40 C.F.R. Part 82, Subpart F	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	
R13-2277G	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 is the fifth renewal of this Title V permit.

1.1. Emission Units

- Updated the design capacity of Barge Loading Stations 1 through 8 from 19,600 bbl/hr to 20,600 bbl/hr because the worst-case hourly distillate loading rate (with gasoline loading at capacity) for Barge Loading was corrected from 6,000 to 7,000 barrels per hour (bbl/hr) to represent maximum equipment capacity. As such, the Barge Loading “maximum simultaneous loading” rate listed in the Title V permit (Table 1.1) was revised from 19,600 bbl/hr to 20,600 bbl/hr. The change to the hourly rates were not the result of a physical change or change in the method of operation of the Barge Loading emissions unit. As such, the revision did not trigger an R13 permitting requirement. Furthermore, the increase in hourly loading rates did not change the annual Barge Loading VOC or HAP emissions.

3.0. Facility-Wide Requirements

- This section contains the most recent boilerplate language.
- This section contains facility wide applicable requirements from 40 C.F.R. 63 Subpart R, which was last amended on May 8, 2024 resulting in the following changes to this section:
 - Old conditions 3.1.9, 3.5.10, 3.5.11, and 3.5.12 have been combined as a single requirement detailing reporting requirements (condition 3.5.10) effective prior to May 8, 2027. The citations of these requirements have also been updated due to the revisions to Subpart R.
 - Old condition 3.1.10 is now condition 3.1.9 and the citation has been updated due to the amendment of Subpart R.
 - Condition 3.2.1 was updated due to the amendment of 40 C.F.R. § 63.424(a).
 - Condition 3.4.4 was moved to section 3.2 as condition 3.2.2 and updated due to the amendment of 40 C.F.R. § 63.424(b).
 - New conditions 3.2.3 and 3.2.4 were added to incorporate the new monitoring requirements from 40 C.F.R. §§60.424(c) and (e)(1) which become effective on May 8, 2027.
 - Removed old condition 3.4.5 since the cited regulations were made into subsections of 40 C.F.R. § 63.424(b) (condition 3.2.2) with the latest amendment of Subpart R.
 - Old Condition 3.4.6 is now condition 3.4.4 and was updated along with its citation.
 - New condition 3.4.5 was added to incorporate the recordkeeping requirements which become effective on May 8, 2027.
 - New conditions 3.5.11 and 3.5.12 were added to incorporate the reporting requirements which become effective on May 8, 2027.

4.0. TriState Storage Tanks

- This section contains requirements from 45CSR21 which was amended on June 1, 2024 resulting in the following changes.
 - Conditions 4.1.1, 4.1.2, 4.4.1, and 4.5.2 had references to the Director which were changed to the Secretary.
- This section contains requirements from 40 C.F.R. 60 Subpart Kb which was last amended on October 15, 2024 resulting in the following changes.
 - Updated condition 4.2.4 to include language from 40 C.F.R. § 60.113b that had been left out of the cited R13 condition.

- Updated conditions 4.5.4 and 4.5.5 to include reporting submittal requirements which took effect on October 15, 2024.
- This section contains requirements from 40 C.F.R. 63 Subpart R which was last amended on May 8, 2024 resulting in the following changes.
 - Updated Condition 4.1.7 due to the amendments of Subpart R.
 - Updated the citations in conditions 4.2.4, 4.2.6, 4.4.4, and 4.5.5 from 40 C.F.R. §63.427(c) to 40 C.F.R. §63.427(e).
 - Updated the citation in condition 4.5.4 from 40 C.F.R. §63.428(d) to 40 C.F.R. §63.428(e).
 - Added monitoring requirements of 40 C.F.R. §63.425(j) as condition 4.2.5.
 - Added the recordkeeping requirements of 40 C.F.R. §63.428(e) as condition 4.4.5.
- This section contains requirements from permit R13-1352A which was issued on March 26, 2007 and currently contains Tank 269 which was never installed and was never incorporated into the Title V permit. There were no changes to the conditions citing R13-1352A.

5.0. Kenova Storage Tanks

- This section contains requirements from permit R13-2277G which was issued on March 31, 2025. Changes to the Title V permit from the issuance of R13-2277G were addressed as part of R30-09900022-2020(MM04).
- This section contains requirements from 45CSR21 which was last amended on June 1, 2024 resulting in the following changes.
 - Conditions 5.1.1.a and 5.5.1, had references to the Director which were changed to the Secretary.
- This section contains requirements from 40 C.F.R. 60 Subpart Kb which was last amended on October 15, 2024 resulting in the following changes.
 - Updated condition 5.2.2 to include language from 40 C.F.R. §60.113b that had been left out of the cited R13 condition.
 - Updated conditions 5.5.3 and 5.5.4 to include reporting submittal requirements which took effect on October 15, 2024.
- This section contains requirements from 40 C.F.R. 63 Subpart R which was last amended on May 8, 2024, 2024 resulting in the following changes.
 - Updated condition 5.1.5 due to the amendments of Subpart R.
 - Updated the citations in conditions 5.2.2, 5.2.4, 5.4.2, and 5.5.4 from 40 C.F.R. §63.427(c) to 40 C.F.R. §63.427(e).
 - Updated the citation in condition 5.5.3 from 40 C.F.R. §63.428(d) to 40 C.F.R. §63.428(e).
 - Added monitoring requirements of 40 C.F.R. §63.425(j) as condition 5.2.3
 - Added the recordkeeping requirements of 40 C.F.R. §63.428(e) as condition 5.4.3.

6.0. MACT Subpart Y Requirements

- This section contains requirements from 40 C.F.R. 63 Subpart Y which was last amended on November 19, 2020.
 - None of the applicable requirements in this section were affected by the amendment to 40 C.F.R. 63 Subpart Y.

7.0. Clarke Loaded Fleet Fire Pump Engine

- This section contains requirements from 40 C.F.R. 60 Subpart IIII which was last amended on May 8, 2024 resulting in the following changes.
 - Condition 7.1.1 was updated to include CO emission standards from Table 4.
 - Updated conditions 7.1.2, 7.1.4, 7.3.1, and 7.5.2 due to the amendment of 40 C.F.R. 60 Subpart IIII.
 - Added conditions 7.5.3 - 7.5.7 to incorporate new applicable requirements for the CEDRI electronic reporting tool.
- This section contains requirements from 40 C.F.R. 63 Subpart ZZZZ which was last amended on August 30, 2024 resulting in the following changes.
 - Updated condition 7.1.6 due to the amendment of 40 C.F.R. 63 Subpart ZZZZ.

8.0. Godwin WW Liftstation Backup Pump

- This section contains requirements from 40 C.F.R. 60 Subpart IIII which was last amended on May 8, 2024 resulting in the following changes.
 - Updated conditions 8.1.2, 8.1.4 and 8.3.1 due to the amendment of 40 C.F.R. 60 Subpart IIII.

9.0. Hot Oil Heater #1

- This section contains requirements from 45CSR2 which was amended on June 1, 2024 resulting in the following changes.
 - Condition 9.3.1 had references to the Director which was changed to the Secretary.
 - Old condition 9.1.2 was deleted since 45CSR§2-10.1 has been removed from 45CSR2.
- This section contains requirements from 40 C.F.R. 63 Subpart DDDDD which was last amended on October 6, 2022 resulting in the following changes.
 - Updated condition 9.5.1 due to the amendment of 40 C.F.R. 63 Subpart DDDDD.

10.0. MACT Subpart EEEE Requirements

- This section contains requirements from 40 C.F.R. 63 Subpart EEEE which was last amended on April 4, 2024.
 - None of the applicable requirements in this section were affected by the amendment to 40 C.F.R. 63 Subpart EEEE.

11.0. Marine Vapor Combustion Unit

- This section was added as part of R30-09900022-2020(MM04) issued on July 18, 2025. There has been no change to the underlying requirements since then.

Non-Applicability Determinations

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

- a. 45CSR21, Section 22: Not applicable because Kenova and TriState Terminals do not have gasoline tank truck loading facilities.
- b. 45SCR§§21-27 & 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 C.F.R. 60, Subpart XX: Not subject because this facility does not have gasoline tank truck loading facilities.
- d. 40 C.F.R. 60, Subpart Kb: Not applicable to Tanks 202, 255, 261, 262, and 273 per 40 C.F.R. §60.110b(b) due to vapor pressure of stored materials.
- e. 40 C.F.R. 60, Subpart Kc: None of the Tanks at the facility have been constructed or modified after October 4, 2023 and are thus not affected sources per 40 C.F.R. §60.110c(a).
- f. 40 C.F.R. 61, Subpart BB: Not subject because the loading of gasoline and petroleum distillates are specifically exempted per 40 C.F.R. § 61.300(a).
- g. 40 C.F.R. 63, Subpart R - Not applicable to Tanks 202*, 255, 261, 262, and 273, since these tanks do not store gasoline.
- h. 40 C.F.R. 63, Subpart EEEE: Not applicable to equipment in gasoline or distillate service per 40 C.F.R. § 63.2406. The definition of organic liquid excludes gasoline, kerosene, and diesel.
- i. 40 C.F.R. 63, Subpart BBBBBB: The Kenova-TriState Terminal is subject to 40 C.F.R. 63, Subpart R. 40 C.F.R. 63, Subpart BBBBBB does not apply to the Kenova-TriState Terminal.

*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:	September 24, 2025
Ending Date:	October 24, 2025

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)

On October 29, 2025 EPA Region III notified WVDAQ that it had completed its review of the permit and had no comments at this time. This notification also identified a missing table header containing units g/KW-hr (g/HP-hr) for the table in condition 7.1.1 whose addition would add clarity to the condition. The missing header has been added to the table in the final permit.