



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Stark County
Application No: 15-1327
NSPS

CERTIFIED MAIL

April 22, 1998

APR 29 1998

MARATHON ASHLAND PETROLEUM LLC
BRENT MCNEESE
2408 GAMBRINUS ROAD S W
CANTON, OH 44711

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
CANTON AIR POLLUTION CONTROL

George V. Volnovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director



Permit to Install Terms and Conditions

Application No. 15-1327
APS Premise No. 1576000301
Permit Fee: \$300.00

Name of Facility: MARATHON ASHLAND PETROLEUM LLC

Person to Contact: BRENT MCNEESE

Address: 2408 GAMBRINUS ROAD S W
CANTON, OH 44711

Location of proposed source(s): 2408 GAMBRINUS ROAD S W
CANTON, OHIO

Description of proposed source(s):
2-30,000 GALLON FIXED ROOF ETHANOL STORAGE TANKS.

Date of Issuance: April 22, 1998

Effective Date: April 22, 1998

The above named entity is hereby granted a permit to install for the above described source(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons)

MARATHON ASHLAND PETROLEUM LLC
Application No. 15-1327
Page 3 of 9
April 22, 1998

may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for MARATHON ASHLAND PETROLEUM LLC located in Stark County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
T170	30,000 gallon fixed roof ethanol storage tank (Tank No. 259)	Compliance with the applicable federal and OAC regulations and the terms and conditions of this permit, and use of submerged fill.	40 CFR 60 Subpart Kb 3745-31-05 (4/12/96)	Recordkeeping per Additional Special Term and Condition B.1. 1.5 tons VOC/year
T171	30,000 gallon fixed roof ethanol storage tank (Tank No. 260)	Compliance with the applicable federal and OAC regulations and the terms and conditions of this permit, and use of submerged fill.	40 CFR 60 Subpart Kb 3745-31-05 (4/12/96)	Recordkeeping per Additional Special Term and Condition B.1. 1.5 tons VOC/year

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Volatile organic compounds	3.0

Note: The information contained under the Summary of Emissions section of the Permit to Install is for informational purposes only and is not enforceable.

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source No.</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
T170	30,000 gallon ethanol tank	Kb
T171	30,000 gallon ethanol tank	Kb

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, OH 43216-3669

and Canton Air Pollution Control
420 Market Ave. N., City Hall
Canton, Ohio 44702-1544

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records

shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Canton Air Pollution Control, 420 Market Ave. N. , City Hall, Canton, Ohio 44702-1544.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

MISCELLANEOUS STORAGE TANKS

Unless otherwise indicated, BAT for any miscellaneous storage tanks identified within this permit consists of the use of submerged fill into the storage tanks. The submerged fill pipe(s) are to be installed within six (6) inches of the bottom of the storage tank.

NEW SOURCE PERFORMANCE STANDARD SUBPART Kb

The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

In accordance with 40 CFR 60.116b(a) and (b), the owner and operator of the following storage vessel(s) shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of each source.

<u>Source Number(s):</u>	<u>Tank Size:</u>	<u>Max Vapor Pressure</u>
T170	30,000 gallon	0.9 psia
T171	30,000 gallon	0.9 psia

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

I. Emissions Unit T170

A. Operational Restrictions (T170)

1. The maximum annual throughput shall not exceed 10,950,000 gallons.
2. Only ethanol shall be stored in this emissions unit. For the storage of materials other than ethanol, the permittee must first obtain approval from the Canton Local Air Agency (LAA).

B. Monitoring and/or Recordkeeping Requirements (T170)

1. The permittee shall maintain readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be maintained for the life of the emissions unit.
2. The permittee shall maintain records of the annual throughput in gallons per year.

C. Reporting Requirements (T170)

1. If the permittee exceeds the annual throughput noted in Additional Special Term and Condition A.1., the permittee shall submit a written report of this exceedance to the Canton LAA within 30 days of the exceedance. The exceedance report, at a minimum, shall identify the actual throughput for the calendar year of concern. A report is only required if an exceedance occurs.

D. Compliance Methods and Emission Testing Requirements (T170)

1. Compliance with the emissions limitations of this permit shall be determined in accordance with the following methods:

a. Emission Limitation

1.5 tons VOC per year

Applicable Compliance Method

Maintain records per Additional Special Term and Condition B.

E. **Miscellaneous Requirements (T170)**

None.

II. **Emissions Unit T171**

A. **Operational Restrictions (T171)**

1. The maximum annual throughput shall not exceed 10,950,000 gallons.
2. Only ethanol shall be stored in this emissions unit. For the storage of materials other than ethanol, the permittee must first obtain approval from the Canton Local Air Agency (LAA).

B. **Monitoring and/or Recordkeeping Requirements (T171)**

1. The permittee shall maintain readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be maintained for the life of the emissions unit.
2. The permittee shall maintain records of the annual throughput in gallons per year.

C. **Reporting Requirements (T171)**

1. If the permittee exceeds the annual throughput noted in Additional Special Term and Condition A.1., the permittee shall submit a written report of this exceedance to the Canton LAA within 30 days of the exceedance. The exceedance report, at a minimum, shall identify the actual throughput for the calendar year of concern. A report is only required if an exceedance occurs.

D. **Compliance Methods and Emission Testing Requirements (T171)**

1. Compliance with the emissions limitations of this permit shall be determined in accordance with the following methods:

a. Emission Limitation

1.5 tons VOC per year

Applicable Compliance Method

Maintain records per Additional Special Term
and Condition B.

E. **Miscellaneous Requirements (T171)**

None.