



State of Ohio Environmental Protection Agency

Street Address:

1800 WaterMark Drive
Columbus, OH 43215-1099

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

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

06/19/98

CERTIFIED MAIL

02-50-11-0227

RE: Final Chapter 3745-35 Permit To Operate

Marathon Oil Company-YNT
David E. Siebold
539 S. Main Street
Environmental L&T
Findlay, OH 45840

Dear David E. Siebold:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them 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 of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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

If you have any questions, please contact the Northeast District Office at (216) 425-9171

Very truly yours,

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

cc: Northeast District Office
Jim Orlemann, DAPC Engineering
Becky Castle, DAPC PMU



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date 06/19/98

Facility ID: 02-50-11-0227

Expiration Date: 06/19/03

FINAL ISSUE

This document constitutes issuance for:

Marathon Oil Company-YNT
1140 Bear's Den Road
Youngstown, OH 44511

of a permit to operate for:

J001 (Loading Racks/VRU)
Loading Racks (2) and VRU

PART I General Terms & Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

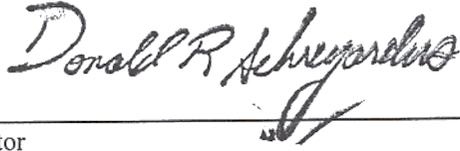
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(216) 425-9171

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Northeast District Office.

10. The permittee is also subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Tank truck loading rack controlled with a refrigerated condenser type vapor recovery unit.	OAC rule 3745-21-09(Q)	Gasoline loading: 0.67 pound of VOC per 1,000 gallons (80 mg/l) of gasoline loaded into the delivery vessel.
A portable flare may be used as a backup control device in the event of an extended shutdown of the refrigeration unit.	OAC rule 3745-35-07	Distillates loading (diesel fuels, fuel oils, kerosene, and ethanol): 0.02 pound of VOC per 1,000 gallons of distillates loaded into the delivery vessel; 1.0 ton of VOC per year.
		The total annual VOC emissions from this emissions unit shall not exceed 64.7 tons. 63.7 tons per year from gasoline loading and 1.0 ton per year from distillates loading.
		See A.2.a below.

2. Additional Terms and Conditions

- 2.a The emissions of hazardous air pollutants (HAPs) from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 10 tons per year for any individual HAP, and 25 tons per year for any combination of HAPs, as rolling, 12-month summations.

B. Operational Restrictions

1. Compliance with the emission limitations as stated in Section A shall be achieved by restricting the annual throughput of gasoline and distillates. The annual throughput of gasoline and distillates shall not exceed 190,000,000 gallons and 100,000,000 gallons, respectively. In order to ensure federal enforceability during the first 12 calendar months of operation after the issuance of this permit to operate (PTO), this emissions unit shall not exceed the following product throughput limitations, in gallons:

Maximum Allowable Cumulative Throughput For:

Month(s)	Gasoline	Distillates
1	15,833,333	8,333,333
1-2	31,666,666	16,666,666
1-3	47,500,000	25,000,000
1-4	63,333,333	33,333,333
1-5	79,166,666	41,666,666
1-6	95,000,000	50,000,000
1-7	110,833,333	58,333,333
1-8	126,666,666	66,666,666
1-9	142,500,000	75,000,000
1-10	158,333,333	83,333,333
1-11	174,166,666	91,666,666
1-12	190,000,000	100,000,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual gasoline and distillates throughput limitations shall be based upon rolling, 12-month summations.

2. The loading rack shall be equipped with a vapor collection system whereby during the transfer of product to any gasoline delivery vessel:
 - a. All vapors displaced from the gasoline delivery vessel during loading are vented only to the vapor collection system.
 - b. The pressure in the vapor collection system is maintained between minus 6 and plus 18 inches of water gauge pressure.
3. The loading rack shall be equipped with a vapor control system whereby:
 - a. All vapors collected by the vapor collection system are vented to the control system.
 - b. Any liquid gasoline returned to a stationary storage tank from the vapor control system is free of entrained air to the extent possible with good engineering design.
4. A means shall be provided to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
5. All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.
6. The permittee shall not permit gasoline to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.
7. The permittee shall repair within 15 days any leak from the vapor collection system and vapor control system which are employed to meet the requirements of paragraph (Q)(1) of OAC rule 3745-21-09 when such leak is equal to or greater than 100% of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.
8. When the refrigerated condenser vapor recovery unit is used to control VOC emissions, the temperature of the coil, in the vapor condenser of the vapor recovery unit, shall be maintained at or less than minus 85 degrees Fahrenheit, as a one-hour average, when the emissions unit is in operation. Gasoline shall not be loaded into any delivery vessel during vapor recovery unit coil defrosting. This temperature restriction does not apply during periods when gasoline is not being loaded and the control device is in stand-by mode, or during daily vapor recovery unit coil defrosting.
9. When the flare vapor control unit is used to control VOC emissions, a pilot flame shall be maintained at all times in the flare's pilot light burner during the loading of products.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The total, individual throughputs, in gallons, of gasoline and distillates for each month.
 - b. During the first 12 calendar months of operation following the issuance of this permit, the cumulative total throughputs, in gallons, of gasoline and distillates for each calendar month.
 - c. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the total gasoline and distillates throughputs, in gallons.
 - d. The total emissions of VOC from this emissions unit, in tons.
 - e. The total emissions of each individual HAP from all emissions units at this facility, in tons.
 - f. The aggregate sum of all HAPs from all emissions units at this facility, in tons.
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the coil temperature in the vapor condenser of the vapor recovery unit, when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
3. The permittee shall properly install, operate, and maintain a device to continuously monitor the flare's pilot flame when the emissions unit is in operation. The monitoring device shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
4. The permittee shall collect and record the following information for each day for the control equipment:
 - a. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
 - b. When the refrigerated condenser vapor recovery unit is used to control VOC emissions, all periods of time during which the temperature of the coil, in the vapor condenser of the vapor recovery unit, was greater than minus 85 degrees Fahrenheit, as a one-hour average, when the emissions unit was in operation.
 - c. When the flare vapor control unit is used to control VOC emissions, the results of the flare pilot flame and flame sensor inspections conducted to verify that the flare's pilot flame and flame sensor are working when the emissions unit was in operation.

D. Reporting Requirements

1. This permittee shall submit semi-annual deviation (excursion) reports which identify all exceedances of the following:
 - a. The rolling, 12-month limitations on the throughputs of gasoline and distillates.
 - b. The maximum allowable cumulative throughput limits, for the first 12 calendar months of operation following the issuance of this permit.
 - c. The rolling, 12-month emission limitation for VOC.
 - d. When the refrigerated condenser vapor recovery unit was used to control VOC emissions, all periods of time during which the temperature of the coil, in the vapor condenser of the vapor recovery unit, was greater than minus 85 degrees Fahrenheit, as a one-hour average, when the emissions unit was in operation.
 - e. When the flare vapor control unit was used to control VOC emissions, all periods during which the flare's pilot flame and flame sensor were not functioning properly when the emissions unit was in operation.

The reports shall also document the cause of each exceedance and an explanation of any corrective actions which have been taken or will be taken to prevent a similar exceedance in the future.

If no deviations occurred during the 6-month period, the permittee shall submit a semi-annual report which states that no deviations occurred during that 6-month period. These reports shall be submitted by February 15 and August 15 of each year and shall address the data obtained during the previous 6-month calendar period.

D. Reporting Requirements (continued)

2. The permittee shall submit annual reports of the total, individual throughputs, in gallons, for gasoline and distillates and the total VOC emissions during the calendar year for this emissions unit, and the total individual HAP and combined HAP emissions for all emissions units at the facility. These annual reports shall be submitted by February 15 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these terms and conditions shall be determined in accordance with the following method(s):
2. Emission Limitation: 0.67 pound VOC per 1,000 gallons of gasoline loaded.
Applicable Compliance Method: Compliance with this emission limitation shall be demonstrated through emission tests.

The emission test methods and procedures are those outlined in OAC rule 3745-21-10(E), i.e., a minimum of one 6-hour test during which at least 300,000 liters (79,260 gallons) of gasoline are loaded. (The test should be conducted at the maximum throughput possible.)

Within 12 months prior to the expiration of this permit, the permittee shall conduct or have conducted, an emission test(s) for this emission unit in order to demonstrate continuing compliance with the allowable VOC mass emission rate. This test shall be done between the months of May through September.

Not later than 30 days prior to proposed test date(s), the permittee shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the source operating parameters, the time(s) and date(s) of the test, and the person(s) who will be conducting the test. Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emission test(s).

Personnel from the Northeast District Office of the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Northeast District Office within 30 days following the test(s).

3. To calculate VOC emissions for the purpose of determining compliance with the applicable emission limitations in Section A, the permittee shall comply with the following:
 - a. VOC emissions from the storage tanks shall be determined using USEPA's "Tanks Program 3.0."
 - b. The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
 - c. VOC emissions from oil water separators shall be based upon the emission factors provided in AP-42, 5th Edition, Table 5.1-2.
 - d. The VOC emissions from gasoline truck loading shall be determined using the most recent VOC stack test results and a vapor-tightness loss rate of 9 mg/l from the trucks. The 9 mg/l leakage emission factor is calculated using 0.5% as the average leakage from a truck passing the 3-inch pressure decay test (USEPA, 1980: Bulk Gasoline Terminals - Background Information for Proposed Standards, Table C-4).
 - e. The VOC emissions from distillates and transmix loading shall be determined using AP-42, 5th Edition, Equation 5.2-1.

E. Testing Requirements (continued)

4. To calculate HAP emissions for the purpose of determining compliance with the applicable emission limitations in Section A.2, the permittee shall comply with the following procedures. For every individual HAP, multiply the following emission factors by the actual annual VOC emission rate for the year (in tons per year) for all gasoline VOC emissions from the facility, including fugitive emissions. These emission factors are based on the liquid weight percent (weight fraction) of each HAP in the gasoline. Speciated emissions were estimated based on equations found in AP-42, 5th Edition, Section 7.1.4, Hazardous Air Pollutant Speciation Methodology.
- a. The HAP emissions from gasoline truck loading and storage shall be determined using the following emission factors:
- benzene - 0.0102 pound of benzene emissions per pound of VOC emissions;
 - ii. cumene - 0.0001 pound of cumene emissions per pound of VOC emissions;
 - iii. toluene - 0.0166 pound of toluene emissions per pound of VOC emissions;
 - iv. xylene - 0.0058 pound of xylene emissions per pound of VOC emissions;
 - v. ethyl benzene - 0.001 pound of ethyl benzene emissions per pound of VOC emissions;
 - vi. n-hexane - 0.0168 pound n-hexane emissions per pound of VOC emissions;
 - vii. isooctane - 0.0052 pound of isooctane per pound VOC emissions;
 - viii. 2,2,4 trimethylpentane - 0.008 pound of 2,2,4 trimethylpentane per pound VOC emissions; and
 - ix. methyl tert-butyl ether (MTBE) - 0.0603 pound of MTBE per pound VOC emissions.
- b. The HAP emissions from distillates truck loading and storage and fugitive emissions shall be determined using USEPA's "VOC/PM Speciation Data System", version 1.50, Oct. 1992.
- c. To determine total combined HAP emissions, sum the calculated annual emission rates for each individual HAP.
- d. Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA and the Marathon Oil Company.

F. Miscellaneous Requirements

1. The following special terms and conditions of this PTO are federally enforceable requirements: A-F.