

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

6/24/2014

Certified Mail

Linda Leppelmeier  
Marathon Pipe Line LLC - East Sparta Facility  
539 S MAIN ST  
RM 729M  
FINDLAY, OH 45840

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1576000788  
Permit Number: P0100967  
Permit Type: Renewal  
County: Stark

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTIO is a final action of the Director 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Canton City Health Department at (330)489-3385 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

*Michael W. Ahern*

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: Canton



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Marathon Pipe Line LLC - East Sparta Facility**

Facility ID:	1576000788
Permit Number:	P0100967
Permit Type:	Renewal
Issued:	6/24/2014
Effective:	6/24/2014
Expiration:	6/24/2024





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Marathon Pipe Line LLC - East Sparta Facility

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**Final Permit-to-Install and Operate**  
Marathon Pipe Line LLC - East Sparta Facility  
**Permit Number:** P0100967  
**Facility ID:** 1576000788  
**Effective Date:** 6/24/2014

## Authorization

Facility ID: 1576000788  
Application Number(s): A0032721, A0032722, A0041600  
Permit Number: P0100967  
Permit Description: PTIO Renewal permit for a transmix loading rack and petroleum liquid storage tanks.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 6/24/2014  
Effective Date: 6/24/2014  
Expiration Date: 6/24/2024  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Marathon Pipe Line LLC - East Sparta Facility  
8930 MAPLEHURST DRIVE  
East Sparta, OH 44626

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

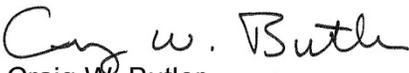
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Canton City Health Department  
420 Market Avenue  
Canton, OH 44702-1544  
(330)489-3385

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0100967

Permit Description: PTIO Renewal permit for a transmix loading rack and petroleum liquid storage tanks.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>J001</b>
Company Equipment ID:	Transmix Truck Loading
Superseded Permit Number:	15-01655
General Permit Category and Type:	Not Applicable

### Group Name: EFR Tanks

<b>Emissions Unit ID:</b>	<b>T001</b>
Company Equipment ID:	Tank No. 475
Superseded Permit Number:	P0074509
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T002</b>
Company Equipment ID:	Tank No. 476
Superseded Permit Number:	P0074510
General Permit Category and Type:	Not Applicable

### Group Name: IFR Tanks

<b>Emissions Unit ID:</b>	<b>T004</b>
Company Equipment ID:	Tank No. 768
Superseded Permit Number:	P0074511
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T005</b>
Company Equipment ID:	Tank No. 769
Superseded Permit Number:	P0074512
General Permit Category and Type:	Not Applicable

### Group Name: NSPS Ka Tanks

<b>Emissions Unit ID:</b>	<b>T007</b>
Company Equipment ID:	Tank No. 877
Superseded Permit Number:	15-085
General Permit Category and Type:	Not Applicable

### Group Name: NSPS Kb Tanks

<b>Emissions Unit ID:</b>	<b>T008</b>
Company Equipment ID:	Tank No. 767
Superseded Permit Number:	15-460
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T012</b>
Company Equipment ID:	Tank No. 766
Superseded Permit Number:	15-01658
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
Marathon Pipe Line LLC - East Sparta Facility  
**Permit Number:** P0100967  
**Facility ID:** 1576000788  
**Effective Date:** 6/24/2014

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Final Permit-to-Install and Operate**  
Marathon Pipe Line LLC - East Sparta Facility  
**Permit Number:** P0100967  
**Facility ID:** 1576000788  
**Effective Date:** 6/24/2014

## **B. Facility-Wide Terms and Conditions**



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.
2. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984: T007. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984: T008 and T012. The complete New Source Performance Standards (NSPS) requirements, including the General Provisions, may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov> or by contacting the appropriate Ohio EPA District Office or Local Air Agency.
3. This facility is subject to the requirements of 40 CFR Part 63, Subpart BBBBBB, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. At this time the Ohio EPA is not accepting the delegated authority to enforce NESHAP standards for area sources. The requirements of this rule, that are applicable to the area source(s) for hazardous air pollutants identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of this rule, including the General Provisions, may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov> or by contacting the appropriate Ohio EPA District Office or Local Air Agency.



**Final Permit-to-Install and Operate**  
Marathon Pipe Line LLC - East Sparta Facility  
**Permit Number:** P0100967  
**Facility ID:** 1576000788  
**Effective Date:** 6/24/2014

## **C. Emissions Unit Terms and Conditions**



**1. J001, Transmix Truck Loading**

**Operations, Property and/or Equipment Description:**

Tranxmix Pipeline Loading Rack - 1 Loading Arm, Tank Trucks, Bottom Load, Average Material Vapor Pressure 155 mmHg.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. c)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC Rule 3745-31-05(F) Voluntary Restriction to Avoid BAT (PTI 15-01655, issued 8/14/2007)	Volatile Organic Compound (VOC) emissions shall not exceed 0.5 tons per year (tpy). See b)(2)a. and c)(1)

(2) Additional Terms and Conditions

a. Permit-to-Install and Operate (PTIO) P0100967 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):



- i. Restricting the annual throughput of transmix material of the loading rack to 300,000 gallons as a rolling, 12-month summation of transmix loaded; and
    - ii. VOC emissions shall not exceed 0.5 tpy.
- c) Operational Restrictions
  - (1) The maximum annual transmix material throughput rate for this emissions unit shall not exceed 300,000 gallons per year, based upon a rolling, 12-month summation of transmix material throughput.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall maintain monthly records of the following information:
    - a. the transmix throughput for each month;
    - b. the rolling, 12-month summation of the transmix throughput; and
    - c. the total VOC emissions from this emission unit, calculated by multiplying the rolling, 12-month summation of the transmix throughput by the emission factor of 3.22 lbs VOC/1000 gallons transmix throughput.
- e) Reporting Requirements
  - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- f) Testing Requirements
  - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:  
0.5 tons VOC/yr  
  
Applicable Compliance Method:  
  
Compliance with the annual allowable VOC emission limitation identified above shall be demonstrated by the monitoring and record keeping requirements specified in section d)(1).
- g) Miscellaneous Requirements
  - (1) None.



**2. Emissions Unit Group – External Floating Roof (EFR) Tanks: T001 and T002.**

<b>EU ID</b>	<b>Company ID</b>	<b>Operations, Property and/or Equipment Description</b>
T001	Tank No. 475	3.36 MM Gallon (80,000 Barrels) EFR Steel, Cylindrical Petroleum Liquid Storage Tank, Installed 6/1/1940.
T002	Tank No. 476	3.36 MM Gallon (80,000 Barrels) EFR Steel, Cylindrical Petroleum Liquid Storage Tank, Installed 6/1/1968.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(Z)	See b)(2)a. and c)(1)

(2) Additional Terms and Conditions

a. The external floating roof storage tank shall be equipped with one of the following:

i. A liquid-mounted primary seal and a rim-mounted secondary seal.

ii. A mechanical shoe primary seal and a rim-mounted secondary seal.

iii. A mechanical shoe primary seal and a shoe-mounted secondary seal, provided the shoe-mounted secondary seal was installed prior to January 1, 1981.



- iv. A vapor-mounted primary seal and a rim-mounted secondary seal.
  - v. A flexible wiper primary seal and a rim-mounted secondary seal.
  - vi. A liquid-mounted primary seal or a mechanical shoe primary seal, provided the petroleum liquid is crude oil with a pour point of 50 degrees Fahrenheit (°F) or higher as determined by ASTM D97-05a.
  - vii. A seal, closure or device which is, in the judgment of the director, equivalent to the following seals in controlling the emission of VOC into the ambient air:
    - (a) the dual seals specified in paragraph (Z)(1)(a)(i) or (Z)(1)(a)(ii) of OAC rule 3745-21-09; or
    - (b) either of the seals specified in paragraph (Z)(1)(a)(vi) of OAC rule 3745-21-09, provided the petroleum liquid is crude oil with a pour point of 50°F or higher as determined by ASTM D97-05a.
- b. Each seal shall meet the following requirements:
- i. There shall be no visible holes, tears, or other openings in the seal or seal fabric.
  - ii. If the tank is of welded construction, the total seal gap area, as determined under paragraph (I) of OAC rule 3745-21-10, shall not exceed:
    - (a) 10.0 square inches per foot of tank diameter for a liquid-mounted primary seal or mechanical shoe primary seal;
    - (b) 10.0 square inches per foot of tank diameter for a vapor-mounted primary seal or flexible wiper primary seal, if said seal was installed prior to January 1, 1981;
    - (c) 1.0 square inch per foot of tank diameter for a vapor-mounted primary seal or flexible wiper primary seal, if said seal was installed on or after January 1, 1981;
    - (d) 1.0 square inch per foot of tank diameter for a rim-mounted secondary seal or shoe-mounted secondary seal; or
    - (e) the amount which is assigned by the director for any seal which is equivalent under paragraph (Z)(1)(a)(vii) of OAC rule 3745-21-09.
  - iii. If the tank is of riveted construction, the maximum seal gap width, as determined under paragraph (I) of OAC rule 3745-21-10, shall not exceed:
    - (a) 2.5 inches for a mechanical shoe primary seal;



- (b) 1.5 inches for a liquid-mounted primary seal, vapor-mounted primary seal, flexible wiper primary seal, shoe-mounted secondary seal or rim-mounted secondary seal; or
- (c) The amount which is assigned by the director for any seal which is equivalent under paragraph (Z)(1)(a)(vii) of OAC rule 3745-21-09.

c) Operational Restrictions

- (1) The external floating roof tank shall be maintained using the following control measures:
  - a. Any opening in the external floating roof, except automatic bleeder vents, rim space vents, leg sleeves, stub drains and slotted gauging/sampling wells, shall be equipped with:
    - i. a cover, seal or lid which remains in the closed position at all times without any visible gaps, except when the opening is in actual use; and
    - ii. a projection into the tank below the liquid surface.
  - b. Any automatic bleeder vent shall remain in the closed position, except when the external floating roof is floated off or landed on the roof leg supports.
  - c. Any rim vent shall be set to open only at the manufacturer's recommended setting, except when the external floating roof is being floated off the roof leg supports.
  - d. Any emergency roof drain shall be equipped with a slotted membrane fabric cover or other device which covers at least 90 percent of the area of the opening.
  - e. Any stub drain shall be equipped with a projection into the tank below the liquid surface.
  - f. Any slotted gauging/sampling well shall be equipped with an object which floats on the liquid surface within the well and which covers at least 90 percent of the area of the well opening.

d) Monitoring and/or Recordkeeping Requirements

- (1) The seals of the external floating roof tank shall be inspected as follows:
  - a. The seal and seal fabric shall be inspected annually for visible holes, tears, or other openings.
  - b. The secondary seal gap shall be measured annually, in accordance with the method specified in paragraph (I) of OAC rule 3745-21-10.
  - c. The primary seal gap shall be measured at least once every 5 years, in accordance with the method specified in paragraph (I) of OAC rule 3745-21-10.



(2) The seal gaps shall be measured to determine the width and area of the gaps between the wall of the external floating roof tank and the seal around the circumference of the roof. The width of the seal gap shall be determined using probes of the appropriate width, to accurately measure the actual distance from the seal to the tank wall. The area of the seal gap shall be determined by multiplying the width of the seal gap by the circumferential length of the gap. The total seal gap area is the accumulated area of all gaps which are greater than 0.125 inch in width.

(3) The permittee shall maintain records of the following information for at least two years:

- a. the dates and results of each seal and seal fabric inspection and each seal gap measurement; and
- b. the annual throughput of each petroleum liquid stored in the tank.

A copy of these records shall be made available to the Director or an authorized representative of the Director upon written or verbal request.

(4) The permittee shall maintain records of the following information for at least five years:

- a. the types of petroleum liquids stored in the tank; and
- b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid.

A copy of these records shall be made available to the Director or an authorized representative of the Director upon written or verbal request.

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or Local Air Agency) within 30 days of any seal and seal fabric inspection or any seal gap measurement, which documents a violation of the applicable control equipment requirements. The notification shall also describe the corrective actions which have been or will be taken to achieve compliance.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. None.



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**Effective Date:** 6/24/2014

g) Miscellaneous Requirements

- (1) None.



**3. Emissions Unit Group – Internal Floating Roof (IFR) Tanks: T004 and T005.**

<b>EU ID</b>	<b>Company ID</b>	<b>Operations, Property and/or Equipment Description</b>
T004	Tank No. 768	3.36 MM Gallon IFR Petroleum Liquid Storage Tank, Installed 6/1/1971.
T005	Tank No. 769	3.36 MM Gallon IFR Petroleum Liquid Storage Tank, Installed 6/1/1973.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(L)	See c)(1)

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:

a. The fixed roof storage tank shall be equipped with an internal floating roof.

b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.



- c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
- d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for the fixed roof tank:
  - a. the types of petroleum liquids stored in the tank; and
  - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

- (2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or Local Air Agency) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. None.

g) Miscellaneous Requirements

- (1) None.



**4. Emissions Unit Group – NSPS Subpart Ka Tanks: T007.**

EU ID	Company ID	Operations, Property and/or Equipment Description
T007	Tank No. 877	840,000 Gallon (20,000 Barrels) IFR Petroleum Liquid Storage Tank, Installed 6/1/1979.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	See b)(2)a.
b.	OAC rule 3745-21-09(L)	See c)(1)
c.	40 CFR Part 60, Subpart Ka (40 CFR 60.110a – 60.115a)	[40 CFR 60.112a(a)(2)] See b)(2)b.
d.	40 CFR Part 60, Subpart A (40 CFR 60.1 – 60.19)	General Provisions.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements for emissions unit T007 includes compliance with OAC rule 3745-21-09(L) and 40 CFR Part 60, Subpart Ka.



- b. In accordance with 40 CFR 60.110a(a), emissions unit T007 is a storage vessel for petroleum liquids that has a capacity greater than 40,000 gallons and commenced construction after May 18, 1978 and prior to July 23, 1984.
  - i. The permittee shall comply with the applicable standards for storage vessels as required under 40 CFR Part 60, Subpart Ka, including the following sections:

60.112a(a)(2)	fixed roof with an internal floating roof
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c) Operational Restrictions

- (1) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:
  - a. The fixed roof storage tank shall be equipped with an internal floating roof.
  - b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
  - c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
  - d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the following information for the fixed roof tank:
  - a. the types of petroleum liquids stored in the tank; and
  - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

- (2) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.
- (3) The permittee shall comply with the applicable monitoring and recordkeeping requirements specified under 40 CFR Part 60, Subpart Ka, including the following sections:



60.115a(a)	petroleum liquid storage records
60.115a(b) and (c)	vapor pressure determination

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or Local Air Agency) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. None.

g) Miscellaneous Requirements

- (1) None.



**5. Emissions Unit Group – NSPS Subpart Kb Tanks: T008 and T012.**

<b>EU ID</b>	<b>Company ID</b>	<b>Operations, Property and/or Equipment Description</b>
T008	Tank No. 767	4.2 MM Gallon IFR Petroleum Liquid Storage Tank, Installed 6/1/1989.
T012	Tank No. 766	4.2 MM Gallon IFR Petroleum Liquid Storage Tank, Installed 6/1/1992.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3) (PTI 15-460, issued 2/15/1989)	See b)(2)a. and c)(1)
b.	OAC rule 3745-31-05(F) Voluntary Restriction to Avoid BAT (PTI 15-01658, issued 7/26/2007)	Volatile Organic Compound (VOC) emissions shall not exceed 9.43 tons per year (tpy) for emissions unit T012. See b)(2)b. and c)(1)
c.	OAC rule 3745-21-09(L)	See b)(2)c.
d.	40 CFR Part 60, Subpart Kb (40 CFR 60.110b – 60.117b)	[40 CFR 60.112b(a)(1)] See b)(2)d. and c)(2)
e.	40 CFR Part 60, Subpart A (40 CFR 60.1 – 60.19)	General Provisions.



(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) requirements for emissions unit T008 include compliance with OAC rule 3745-21-09(L) and 40 CFR Part 60, Subpart Kb.
- b. Permit-to-Install and Operate (PTIO) P0100967 for emissions unit T012 takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
  - i. submerged fill line during the tank loading operations; and
  - ii. VOC emissions shall not exceed 9.43 tpy.
- c. The requirements of this rule are less stringent than the requirements specified in 40 CFR Part 60, Subpart Kb.
- d. In accordance with 40 CFR 60.110b(a), emissions units T008 and T012 are storage vessels with a capacity greater than 75 cubic meters (m<sup>3</sup>) that are used to store Volatile Organic Liquids (VOL) for which construction commenced after July 23, 1984.
  - i. The permittee shall comply with the applicable standards for storage vessels when storing VOL with a vapor pressure greater than 3.5 kPa (0.5 psi) as required under 40 CFR Part 60, Subpart Kb, including the following sections:

60.112b(a)(1)	fixed roof with an internal floating roof
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c) Operational Restrictions

- (1) These emissions units shall employ a submerged fill line during the tank loading operations.
- (2) These emissions units shall only be used for the storage of petroleum liquids with a maximum true vapor pressure of less than 11.1 psia.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the actual annual throughput, in either gallons per year or barrels per year for emissions units T012.
- (2) The permittee shall calculate and maintain records of the annual VOC emissions from emissions unit T012. The actual annual throughput recorded for any calendar year shall be the basis for calculating the annual emissions of VOC by using the emissions estimation methodologies provided in the most current version of AP-42 or the most recent version of USEPA's TANKS computer program.



- (3) The permittee shall comply with the applicable monitoring and recordkeeping requirements for storage vessels when storing VOL with a vapor pressure greater than 3.5 kPa (0.5 psi) as specified under 40 CFR Part 60, Subpart Kb, including the following sections:

60.113b(a)(1) through (4)	inspection and repair procedures
60.115b(a)(2)	inspection records
60.116b(a)	record retention periods
60.116b(b)	vessel dimension and capacity
60.116b(c)	VOL storage records
60.116b(e) and (f)	VOL vapor pressure

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall comply with the applicable reporting requirements for storage vessels when storing VOL with a vapor pressure greater than 3.5 kPa (0.5 psi) as specified under 40 CFR Part 60, Subpart Kb, including the following sections:

60.113b(a)(5)	inspection notifications
60.115b(a)(1)	control equipment certification report
60.115b(a)(3) and (4)	inspection reports

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

9.43 tons VOC/yr for emissions unit T012

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation identified above shall be demonstrated by the monitoring and record keeping requirements specified in sections d)(1) and d)(2).



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g) Miscellaneous Requirements

- (1) None.