



10/16/2014

Greg Moore
Marathon Petroleum Company LP
539 S Main St.
Office 6692
Findlay, OH 45840

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0125040071
Permit Number: P0117536
Permit Type: Initial Installation
County: Franklin

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Columbus Dispatch. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall Permit Review/Development Section Ohio EPA, DAPC 50 West Town Street Suite 700 PO Box 1049 Columbus, Ohio 43216-1049	and	Ohio EPA DAPC, Central District Office 50 West Town Street, 6th Floor P.O. Box 1049 Columbus, OH 43216-1049
---	-----	--

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

Erica R. Engel-Ishida, Interim Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-CDO

PUBLIC NOTICE

10/16/2014 Issuance of Draft Air Pollution Permit-To-Install and Operate

Marathon Petroleum Company LP

4125 FISHER ROAD,

Columbus, OH 43228

Franklin County

FACILITY DESC.: Petroleum Bulk Stations and Terminals

PERMIT #: P0117536

PERMIT TYPE: Initial Installation

PERMIT DESC: Initial installation permit for three (3) previously exempt tanks and fugitive emission sources.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Pamela McCoy, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Marathon Petroleum Company LP (Marathon) submitted an application for four previously unpermitted emissions units. Emissions unit P801 (fugitive emissions from valves, pump seals and fittings/connectors) was previously considered to be a de minimis source. The source emissions were reevaluated and determined to exceed the de minimis levels. Tanks T026 and T028 were previously permit exempt pursuant to OAC rule 3745-31-03(A)(1)(l)(vi) when storing distillate. Tank T030 was previously permit exempt pursuant to OAC rule 3745-31-03(A)(1)(l)(vi) when storing jet fuel. Marathon has requested to store gasoline in these tanks, and they will no longer qualify for a permit exemption.

3. Facility Emissions and Attainment Status:

Marathon is a source of VOC and HAP emissions from the loading and storage of petroleum products. Emissions from the loading racks (J001 and J002) are controlled by vapor recovery units. The facility's permit contains federally enforceable limitations to avoid Title V and MACT requirements. The loading racks are limited to annual throughputs of 525,000,000 gallons of gasoline and 275,000,000 gallons of distillate per rolling, 12-month period and a VOC emissions limitation of 0.084 pound of VOC per 1,000 gallons of gasoline loaded.

Franklin County is currently in marginal nonattainment for the 2008 eight-hour ozone standard.

4. Source Emissions:

Emissions Unit	Description	VOC (tpy)	Hexane (tpy)	Total HAPs (tpy)
J001	West Loading Rack	44.72	0.69	2.26
J002	East Loading Rack			
P004	Laboratory Hoods	0.75	0.01	0.04
P801	Valves, pump seals, fittings/connections	2.75	0.04	0.14
T001, T002, T003, T004, T005, T006, T007, T009, T010, T011, T012, T017, T022, T025, T027, T029, T032, T026, T028, T030, T031, T032,	Gasoline and distillate storage tanks	49.52	0.77	2.51



Emissions Unit	Description	VOC (tpy)	Hexane (tpy)	Total HAPs (tpy)
T033, T034, T031, T036, T037, T038, T039, T040, T041, T042, T043, T046				
T047	Oil/water separators	0.37	0.01	0.02
Facility Total		98.11	1.52	4.97

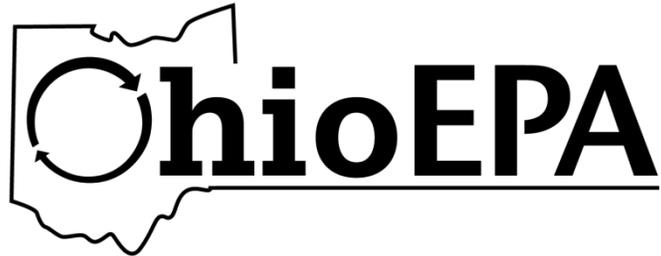
5. Best Available Technology (BAT) Determination:

Tanks T028 and T030 were installed prior to January 1, 1974 and BAT does not apply to these sources.

Best Available Technology (BAT) has been established in accordance with Ohio EPA's February 7, 2014, BAT guidance for P801 and T026. Specifically, BAT was established as GACT-based limits. 40 CFR Part 63 Subpart BBBB National Emission Standards for Hazardous Air Pollutants (NESHAP) for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Area Sources contains control requirements for gasoline storage tanks (i.e., compliance with 40 CFR Part 60, Subpart Kb) and work practice standards (i.e., monthly leak detection and repair requirements) for valves, pump seals and fittings/connectors. These requirements have been identified as BAT for P801 and T026.

6. Conclusion:

The issuance of P0117536 is recommended. The emission limitations, operational restrictions, monitoring, recordkeeping and testing requirements contained in this FEPTIO are adequate to ensure that the applicable VOC and HAP thresholds will not be exceeded.



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Marathon Petroleum Company LP**

Facility ID:	0125040071
Permit Number:	P0117536
Permit Type:	Initial Installation
Issued:	10/16/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Marathon Petroleum Company LP

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit?	4
3. What records must I keep under this permit?	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application?	4
6. What happens to this permit if my project is delayed or I do not install or modify my source?	5
7. What reports must I submit under this permit?	5
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?	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?	7
15. What happens if a portion of this permit is determined to be invalid?	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions	13
1. P801, Fugitive Components	14
2. T026, Tank 55-18.....	17
3. Emissions Unit Group -Tanks: T028 and T030.....	21



Draft Permit-to-Install and Operate

Marathon Petroleum Company LP

Permit Number: P0117536

Facility ID: 0125040071

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0125040071
Application Number(s): A0047211
Permit Number: P0117536
Permit Description: Initial installation permit for three (3) previously exempt tanks and fugitive emission sources.
Permit Type: Initial Installation
Permit Fee: \$2,450.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 10/16/2014
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Marathon Petroleum Company LP
4125 FISHER ROAD
Columbus, OH 43228

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:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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: P0117536

Permit Description: Initial installation permit for three (3) previously exempt tanks and fugitive emission sources.

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

Emissions Unit ID:	P801
Company Equipment ID:	Fugitive Components
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	T026
Company Equipment ID:	Tank 55-18
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Tanks

Emissions Unit ID:	T028
Company Equipment ID:	Tank 41-371
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T030
Company Equipment ID:	Tank 24-376
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate

Marathon Petroleum Company LP

Permit Number: P0117536

Facility ID: 0125040071

Effective Date: To be entered upon final issuance

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 Ohio EPA DAPC, Central District Office 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.



Draft Permit-to-Install and Operate

Marathon Petroleum Company LP

Permit Number: P0117536

Facility ID: 0125040071

Effective Date: To be entered upon final issuance

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) 2., 3., 4., 5., 6., 7., 8. and 9.
2. The emissions of volatile organic compounds (VOC) from J001, J002, P801, T001, T002, T003, T004, T009, T010, T011, T025, T026, T027, T028, T029, T030, T031, T032, all de minimis emissions units as defined in OAC rule 3745-15-05, and all registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 99 tons per rolling, 12-month period.
3. The emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from J001, J002, P801, T001, T002, T003, T004, T009, T010, T011, T025, T026, T027, T028, T029, T030, T031, T032, all de minimis emissions units as defined in OAC rule 3745-15-05, and all registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon rolling, 12-month summations of the HAP emissions.
4. The annual throughput of gasoline (i.e., gasoline, ethanol, and gasoline additives) from J001 and J002 combined shall not exceed 525,000,000 gallons per rolling, 12-month period.
5. The annual throughput of distillates (i.e., diesel and diesel additives) from J001 and J002 combined shall not exceed 275,000,000 gallons per rolling, 12-month period.
6. The permittee shall on a monthly basis maintain the following information for the entire facility:
 - a) the total throughput of gasoline, in gallons per month;
 - b) the total throughput of distillates, in gallons per month;
 - c) the total VOC emissions, in tons per month;
 - d) the individual HAP emissions, in tons per month;
 - e) the combined HAP emissions, in tons per month;
 - f) the rolling, 12-month summation of the total gasoline throughput from J001 and J002 combined, in gallons;
 - g) the rolling, 12-month summation of the total distillate throughput from J001 and J002 combined, in gallons;



- h) the rolling, 12-month summation of total VOC emissions, in tons;
- i) the rolling, 12-month summation of individual HAP emissions, in tons; and
- j) the rolling, 12-month summation of combined HAP emissions, in tons.

7. The permittee shall submit quarterly deviation (excursion) reports that identify:

- a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - (1) all exceedances of the rolling, 12-month gasoline throughput limitation;
 - (2) all exceedances of the rolling, 12-month distillate throughput limitation;
 - (3) all exceedances of the rolling, 12-month VOC emission limitation;
 - (4) all exceedances of the rolling, 12-month individual HAP emission limitation; and
 - (5) all exceedances of the rolling, 12-month combined HAP emission limitation.
- b) the probable cause of each deviation (excursion).
- c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).
- d) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the director (Ohio EPA, Central District Office).

8. Emission Limitation

The emissions of volatile organic compounds (VOC) from J001, J002, P801, T001, T002, T003, T004, T009, T010, T011, T025, T026, T027, T028, T029, T030, T031, T032, all de minimis emissions units as defined in OAC rule 3745-15-05, and all registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 99 tons per rolling, 12-month period.

Applicable Compliance Method

Compliance with this emission limitation shall be determined in accordance with the recordkeeping requirements in B.6 above and as follows:



- a) VOC emissions from gasoline and distillate loading shall be determined in accordance with the monitoring and recordkeeping requirements specified in the Emissions Unit Terms and Conditions section of the permit for J001 and J002.
- b) VOC emissions from the storage tanks shall be determined using the most recent version of the U.S. EPA's TANKS program for working and standing losses and AP-42, Section 7.1 for landing losses.
- c) VOC emissions from valves, pump seals and fittings/connectors (emissions unit P801) shall be determined using U.S. EPA's "Protocol for Equipment Leak Emission Estimates" (11/95).

9. Emission Limitations

The emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from J001, J002, P801, T001, T002, T003, T004, T009, T010, T011, T025, T026, T027, T028, T029, T030, T031, T032, all de minimis emissions units as defined in OAC rule 3745-15-05, and all registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon rolling, 12-month summations of the HAP emissions.

Applicable Compliance Method

Compliance with these emission limitations shall be determined in accordance with the recordkeeping requirements in B.6 above and as follows:

- a) For individual and combined HAP emissions from gasoline loading, storage tanks, valves, pump seals and fittings/connectors, multiply the VOC emissions by the following HAP emission factors:

benzene – 18 pounds of benzene emissions per ton of VOC emissions;
ethylbenzene - 2 pounds of ethylbenzene emissions per ton of VOC emissions;
hexane - 32 pounds of hexane emissions per ton of VOC emissions;
toluene - 26 pounds of toluene emissions per ton of VOC emissions;
isooctane – 16 pounds of isooctane emissions per ton of VOC emissions; and
xylene - 10 pounds of xylene emissions per pound of VOC emissions.

- b) For individual and combined HAP emissions from distillate loading, storage tanks, valves, pump seals and fittings/connectors, multiply the VOC emissions by the following HAP emission factors:

benzene – 0.4 pound of benzene emissions per ton of VOC emissions;
ethylbenzene – 0.8 pound of ethylbenzene emissions per ton of VOC emissions;
hexane – 0.2 pound of hexane emissions per ton of VOC emissions;
toluene – 5.2 pounds of toluene emissions per ton of VOC emissions;
isooctane – 0.0 pound of isooctane emissions per ton of VOC emissions; and
xylene – 13.8 pounds of xylene emissions per pound of VOC emissions.



Draft Permit-to-Install and Operate

Marathon Petroleum Company LP

Permit Number: P0117536

Facility ID: 0125040071

Effective Date: To be entered upon final issuance

10. The Ohio EPA has determined that 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 Area Sources. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



Draft Permit-to-Install and Operate

Marathon Petroleum Company LP

Permit Number: P0117536

Facility ID: 0125040071

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P801, Fugitive Components

Operations, Property and/or Equipment Description:

Fugitive emissions from valves, pump seals, fittings/connectors

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. b)(1)c.

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)	The requirements established pursuant to this rule are equivalent to the requirements of 40 CFR Part 63, Subpart BBBB. See b)(2)a. and d)(1) through d)(4) below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 tons per year. See b)(2)b. below.
c.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid Title V and MACT)	See 2. through 9. of Section B - Facility-Wide Terms and Conditions.



- (2) Additional Terms and Conditions
 - a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
 - b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall perform monthly leak inspections of all equipment associated with this emissions unit. For these inspections, detection methods incorporating sight, sound, and smell are acceptable.
 - (2) A log book shall be used and shall be signed by the owner or operator at the completion of each monthly inspection. A section of the log book shall contain a list, summary description, or diagram(s) showing the location of all equipment associated with this emissions unit.
 - (3) Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak, except when the repair is not feasible within 15 days.
 - (4) The permittee shall record in the log book for each leak that is detected the following information.
 - a. The equipment type and identification number.
 - b. The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell).
 - c. The date the leak was detected and the date of each attempt to repair the leak.
 - d. Repair methods applied in each attempt to repair the leak.
 - e. "Repair delayed" and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak.
 - f. The expected date of successful repair of the leak if the leak is not repaired within 15 days.
 - g. The date of successful repair of the leak.



e) Reporting Requirements

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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.



2. T026, Tank 55-18

Operations, Property and/or Equipment Description:

2,097,824 Gallon Internal Floating Roof Storage Tank (55-18)

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. b)(1)d.

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)	The control requirements specified by this rule are less stringent than control requirements established pursuant to 40 CFR Part 60, Subpart Kb.
b.	OAC rule 3745-31-05(A)(3)	The requirements established pursuant to this rule are equivalent to the requirements of 40 CFR Part 63, Subpart BBBB. See b)(2)a., b)(2)c. and c)(1) below.
c.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 tons per year. See b)(2)b. below.
d.	OAC rule 3745-31-05(D)	See 2. through 9. of Section B - Facility-



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(Federally enforceable limitations to avoid Title V and MACT)	Wide Terms and Conditions.
e.	40 CFR Part 60, Subpart Kb	See c)(1) below.

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. Pursuant to 40 CFR 63.11087(f), a storage tank subject to and complying with the control requirements of 40 CFR Part 60, Subpart Kb will be deemed in compliance with 40 CFR Part 63, Subpart BBBBBB.

c) Operational Restrictions

- (1) The permittee shall equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications:
 - a. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
 - b. The internal floating roof shall be equipped with a mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
 - c. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
 - d. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each



access hatch and automatic gauge float well shall be bolted except when they are in use.

- e. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
- f. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- g. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
- h. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- i. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

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/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart Kb.

e) **Reporting Requirements**

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic



submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall notify the director (the Ohio EPA, Central District Office) 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.
 - (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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.
 - (4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart Kb.
- 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.
 - (2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart Kb.
- g) Miscellaneous Requirements
- (1) None.



3. Emissions Unit Group -Tanks: T028 and T030

EU ID	Operations, Property and/or Equipment Description
T028	1,634,408 Gallon Internal Floating Roof Storage Tank (41-371)
T030	935,290 Gallon Internal Floating Roof Storage Tank (24-376)

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. b)(1)b.

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) below.
b.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid Title V and MACT)	See 2. through 9. of Section B - Facility-Wide Terms and Conditions.

(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) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall notify the director (the Ohio EPA, Central District Office) 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.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this



Draft Permit-to-Install and Operate

Marathon Petroleum Company LP

Permit Number: P0117536

Facility ID: 0125040071

Effective Date: To be entered upon final issuance

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.