



4/9/2015

Certified Mail

David Elder
 Marathon Petroleum Company LP - Canton Refinery
 2408 Gambrinus Avenue SW
 Canton, OH 44706

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
 Facility ID: 1576002006
 Permit Number: P0118474
 Permit Type: Administrative Modification
 County: Stark

| | |
|-----|------------------------------------|
| No | TOXIC REVIEW |
| No | PSD |
| No | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No | CEMS |
| Yes | MACT/GACT |
| Yes | NSPS |
| No | NESHAPS |
| No | NETTING |
| No | MAJOR NON-ATTAINMENT |
| No | MODELING SUBMITTED |
| No | MAJOR GHG |
| No | SYNTHETIC MINOR TO AVOID MAJOR GHG |

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. 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 PTI 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

How to give us feedback on your permitting experience

Please complete a survey at 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 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,



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

Cc: U.S. EPA
Canton; Pennsylvania; West Virginia



FINAL

**Division of Air Pollution Control
Permit-to-Install**

for

Marathon Petroleum Company LP - Canton Refinery

| | |
|----------------|-----------------------------|
| Facility ID: | 1576002006 |
| Permit Number: | P0118474 |
| Permit Type: | Administrative Modification |
| Issued: | 4/9/2015 |
| Effective: | 4/9/2015 |



Division of Air Pollution Control
Permit-to-Install
for
Marathon Petroleum Company LP - Canton Refinery

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Authorization

Facility ID: 1576002006
Facility Description: Petroleum Refinery
Application Number(s): M0003261
Permit Number: P0118474
Permit Description: Administrative Modification to add a recordkeeping requirement for particulate matter less than 2.5 microns in diameter due to updating the project scope to add a new line from the Continuous Catalytic Reformer to transport net gas to the South Area fuel drum which will then be fired in process heaters.
Permit Type: Administrative Modification
Permit Fee: \$500.00
Issue Date: 4/9/2015
Effective Date: 4/9/2015

This document constitutes issuance to:

Marathon Petroleum Company LP - Canton Refinery
2408 Gambrinus Avenue SW
Canton, OH 44706

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

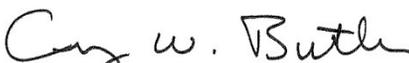
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Final Permit-to-Install
Marathon Petroleum Company LP - Canton Refinery
Permit Number: P0118474
Facility ID: 1576002006
Effective Date:4/9/2015

Authorization (continued)

Permit Number: P0118474

Permit Description: Administrative Modification to add a recordkeeping requirement for particulate matter less than 2.5 microns in diameter due to updating the project scope to add a new line from the Continuous Catalytic Reformer to transport net gas to the South Area fuel drum which will then be fired in process heaters.

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

| | |
|-----------------------------------|-----------------------------|
| Emissions Unit ID: | P086 |
| Company Equipment ID: | Utica Wastewater Collection |
| Superseded Permit Number: | P0113581 |
| General Permit Category and Type: | Not Applicable |



Final Permit-to-Install
Marathon Petroleum Company LP - Canton Refinery
Permit Number: P0118474
Facility ID: 1576002006
Effective Date:4/9/2015

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Canton City Health Department.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Canton City Health Department. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Canton City Health Department every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Canton City Health Department in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) 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 appropriate Ohio EPA District Office or contracted



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 electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Canton City Health Department concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.



8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the



Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.



13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) [OAC rule 3745-15-03(A)]
Unless other arrangements have been approved by the Director (the appropriate Ohio EPA District Office or local air agency), all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

2. OAC rule 3745-31-10(A)
 - a) [OAC rule 3745-31-10(A)(1)]
Before beginning actual construction of the NSR project, the permittee shall document and maintain a record of the following information:
 - (1) A description of the NSR project;
 - (2) Identification of the emissions unit(s) whose emissions of a regulated NSR pollutant could be affected by the NSR project; and
 - (3) A description of the applicability test used to determine that the NSR project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions, the projected actual emissions, the amount of "could have accommodated" emissions excluded under paragraph (AAAAA)(1) of rule 3745-31-01 of the Administrative Code and an explanation for why such amount was excluded, and any netting calculations, if applicable.

 - b) [OAC rule 3745-31-10(A)(2)]
The information required in OAC rule 3745-31-10(A)(1) was documented and submitted to the Ohio EPA within Permit-to-Install (PTI) Application A0047215.

 - c) [OAC rule 3745-31-10(A)(3)]
The permittee shall monitor and calculate the emissions of Nitrogen Oxide (NO_x) and Particulate Matter less than 2.5 microns in diameter (PM_{2.5}) from the emissions units affected by the Utica Condensate Fractionator Project as identified within the associated PTI Application A0047215, and maintain a record of the annual emissions, in tons per year on a calendar basis, for a period of 5 years following resumption of regular operations after the change.

 - d) [OAC rule 3745-31-10(A)(5)]
The permittee shall submit a report to the director if the actual annual NO_x emissions, in tons per year as calculated pursuant to OAC rule 3745-31-10(A)(3), from the Utica Condensate Fractionator Project, exceed the baseline actual emissions by a significant amount (as documented and maintained pursuant to term B.2.a)(3)) and if such emission differ from the preconstruction projection as documented and maintained pursuant to OAC rule 3745-31-10(A)(1). Such reports shall be submitted to the director within 60 days after the end of such year. The report shall contain the following:
 - (1) The name, address, and telephone number of the major stationary source;
 - (2) the annual emissions as calculated pursuant to OAC rule 3745-31-10(A)(3); and
 - (3) Any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).



C. Emissions Unit Terms and Conditions



1. P086, Utica Wastewater Collection

Operations, Property and/or Equipment Description:

Wastewater collection components (7 drains and 1 junction box) associated with the Utica Condensate Fractionator Project

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) 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), as effective 06/30/2008 [Best Available Technology (BAT) for pollutants less than 10 tons per year] | Volatile Organic Compound (VOC) emissions shall not exceed 1.10 tons per year See b)(2)a. – b. |
| b. | OAC rule 3745-31-05(A)(3)(a)(ii), as effective 06/30/2008 [Less than 10 tons/yr BAT exemption] | See b)(2)c. |
| c. | 40 CFR Part 60, Subpart A (40 CFR 60.1 – 19) | General Provisions |
| d. | 40 CFR Part 60, Subpart QQQ (40 CFR 60.690 – 699) See b)(2)d. | See b)(2)e. – f. |
| e. | 40 CFR Part 63, Subpart A (40 CFR 63.1 – 16) | General Provisions |
| f. | 40 CFR Part 63, Subpart CC (40 CFR 63.640 – 656) See b)(2)g. | See b)(2)h. – i. |



- (2) Additional Terms and Conditions
- a. The Best Available Technology (BAT) requirements have been determined to be compliance with the requirements of 40 CFR Part 60, Subpart QQQ and 40 CFR Part 63, Subpart CC, as identified in this permit.
 - b. 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) as part of Ohio's State Implementation Plan (SIP).
 - c. This requirement applies once U.S. EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of Ohio's SIP:
 - i. The BAT requirement under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the calculated annual emission rate for VOC is less than 10 tons/yr, taking into account the federally enforceable control requirements of 40 CFR Part 60, Subpart QQQ.
 - d. In accordance with 40 CFR 60.690(a), the affected facility is defined as each individual drain system located in a petroleum refinery for which construction, modification, or reconstruction commenced after May 4, 1987.
 - e. Each owner or operator subject to the provisions of this subpart shall comply with the requirements of 40 CFR 60.692-1 to 60.692-5 and with 40 CFR 60.693-1 and 60.693-2, as applicable, except during periods of startup, shutdown, or malfunction.
 - f. Compliance with 40 CFR 60.692-1 to 60.692-5 and with 40 CFR 60.693-1 and 60.693-2, as applicable, will be determined by review of records and reports, review of performance test results, and inspection using the methods and procedures specified in 40 CFR 60.696.
 - g. In accordance with 40 CFR 63.640(c)(3), the affected facility is defined as all wastewater streams and treatment operations associated with petroleum refining process units that emit or have equipment containing or contacting one or more of the Hazardous Air Pollutants (HAPs) listed in Table 1 of 40 CFR Part 63, Subpart CC.
 - h. In accordance with 40 CFR 63.653(d)(2)(viii), the permittee shall maintain documentation of the information used to determine that the wastewater stream is a Group 2 wastewater stream, as defined in 40 CFR 63.641.
 - i. In accordance with 40 CFR 63.640(o)(1), Group 2 wastewater streams managed in equipment subject to the requirements of 40 CFR Part 60, Subpart QQQ are required to comply with 40 CFR Part 60, Subpart QQQ.



c) Operational Restrictions

- (1) The permittee shall comply with the applicable standards required under 40 CFR Part 60, Subpart QQQ including the following sections:

| | |
|-----------------------------|--|
| 40 CFR 60.692-1(a) | Standards apply except during periods of startup, shutdown, or malfunction |
| 40 CFR 60.692-2(a)(1) | Equip drains with water seal controls |
| 40 CFR 60.692-2(b)(1) – (2) | Equip junction boxes with cover and may have open vent pipe with specific dimensions; covers must have tight seal around edge, covers must be in place at all times except during inspection/maintenance |
| 40 CFR 60.692-2(c)(1) | Cover or enclose sewer lines with no visual gaps or cracks in emission interfaces |
| 40 CFR 60.692-2(e) | Requirements for catch basins |
| 40 CFR 60.692-4 | Standards for aggregate facility |
| 40 CFR 60.692-6 | Delay of repair provisions |
| 40 CFR 60.692-7 | Delay of compliance provisions |
| 40 CFR 60.693-1 | Alternative standards for individual drain systems |

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR Part 60, Subpart QQQ including the following sections:

| | |
|--------------------------|--|
| 40 CFR 60.692-2(a) – (4) | Visual or physical inspection requirements for drains |
| 40 CFR 60.692-2(a)(5) | Repair requirements for low water levels or missing or improperly installed caps or plugs |
| 40 CFR 60.692-2(b)(3) | Semiannual visual inspection requirements for junction boxes |
| 40 CFR 60.692-2(b)(4) | Repair requirements for junction box covers |
| 40 CFR 60.692-2(c)(2) | Semiannual visual inspection requirements for unburied sewer lines |
| 40 CFR 60.692-2(c)(3) | Repair requirements for unburied sewer lines |
| 40 CFR 60.696(a) | Requirements for inspecting any equipment installed in compliance with this Subpart for potential emissions, defects, or other problems before using the equipment |
| 40 CFR 60.697(a) – (b) | Recordkeeping requirements for individual drain systems, junction boxes, and sewer lines |



| | |
|---------------------------|--|
| 40 CFR 60.697(e) | Delay of repair or compliance requirements for emission points |
| 40 CFR 60.697(f)(1) – (2) | Recordkeeping requirements for design specifications of the equipment used to comply with Subpart QQQ |
| 40 CFR 60.697(f)(3) | Recordkeeping requirements for operation and maintenance of closed drain systems and closed vent systems |
| 40 CFR 60.697(g) | Location of out of active service drains with tightly sealed cap or plug |

e) Reporting Requirements

- (1) The permittee shall comply with the applicable reporting requirements specified under 40 CFR Part 60, Subpart QQQ, including the following sections:

| | |
|---------------------|---|
| 40 CFR 60.698(a) | Notification for use of alternative standard in 40 CFR 60.693 |
| 40 CFR 60.698(b)(1) | Initial and semiannual certification for all required inspections |
| 40 CFR 60.698(c) | Semiannual reports that summarize all inspections when a water seal was dry or breached, when drain caps or plugs were missing or improperly installed, or when cracks, gaps, or other problems were identified that resulted in VOC emissions. Include the repairs and corrective actions taken. |
| 40 CFR 60.698(e) | Delay of compliance notification |

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:

1.10 tons VOC/yr

Applicable Compliance Method:

The annual (ton/yr) VOC emissions rate specified above was established by first finding the concentration of VOC in the wastewater. This can be calculated by multiplying the benzene concentration in wastewater (21 parts per million (ppm)) by the ratio of total VOC concentration to benzene concentration in wastewater (17 ppm VOC/ ppm benzene), as shown below:



$$21 \text{ ppm benzene} * \frac{17 \text{ ppm VOC}}{\text{ppm benzene}} = 357 \text{ ppm VOC}$$

Both these concentration values can be found in the May 2011 *Emission Estimation Protocol for Petroleum Refineries*, Version 2.1.1, in Table 7 – 8 and Table 7 – 9, respectively.

The wastewater emissions were then calculated using the *Refinery Wastewater Emissions Tools spreadsheet – March 2011* available on the website <http://www.epa.gov/ttnchie1/efpac/protocol/>. This spreadsheet required the following inputs to calculate the air emissions:

- Sealed drains: 7
- Controlled junction box: 1
- Wastewater flowrate: 0.00315 m³/s
- Point-of-generation concentration: 357 ppm (i.e., g/m³) VOC
(input as n-Butane as the VOC surrogate)

By keeping the default 95% control efficiency in the spreadsheet, which is assumed if compliance with 40 CFR 60, Subpart QQQ is achieved, the calculated air emission rate produced was 0.031 grams per second VOC.

The 0.031 g/s VOC emission rate was then converted to a pounds per hour (lbs/hr) emission rate using various mass conversions and time conversions, as shown below:

$$\frac{0.031 \text{ g}}{\text{s}} * \frac{\text{kg}}{1,000 \text{ g}} * \frac{\text{lb}}{0.45359237 \text{ kg}} * \frac{60 \text{ s}}{\text{min}} = 0.25 \frac{\text{lb}}{\text{hr}} \text{ VOC}$$

The lbs/hr VOC emission rate was then multiplied by the maximum operating schedule of 8,760 hours per year (hrs/yr) and then divided by the mass conversion of pounds per ton (lbs/ton) to yield the maximum potential to emit tons of VOC per year value, as shown below:

$$\frac{0.25 \text{ lbs}}{\text{hr}} * \frac{8,760 \text{ hrs}}{\text{yr}} * \frac{\text{ton}}{2,000 \text{ lbs}} = 1.10 \frac{\text{tons}}{\text{yr}} \text{ VOC}$$

Compliance with the emission limit is assumed provided compliance with the terms and conditions of this permit is achieved.

- g) Miscellaneous Requirements
 - (1) None.