



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
STARK COUNTY**

CERTIFIED MAIL

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

Application No: 15-01658

Fac ID: 1576000788

DATE: 5/8/2007

Marathon Pipe Line LLC
Gary Wilson
539 South Main St., Room 4603
Findlay, OH 45840

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$750** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

Canton LAA

Stark County Area Trans. Study

WV

PA

STARK COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 15-01658 FOR AN AIR CONTAMINANT SOURCE FOR
Marathon Pipe Line LLC**

On 5/8/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Marathon Pipe Line LLC**, located at **8930 Maplehurst Ave., S.E., East Sparta, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 15-01658:

State only PTI to modify a storage vessel VOC emissions which stores transmix materials. The tank is designated as T012(no. 766).

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

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



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 15-01658

Application Number: 15-01658
Facility ID: 1576000788
Permit Fee: **To be entered upon final issuance**
Name of Facility: Marathon Pipe Line LLC
Person to Contact: Gary Wilson
Address: 539 South Main St., Room 4603
Findlay, OH 45840

Location of proposed air contaminant source(s) [emissions unit(s)]:
**8930 Maplehurst Ave., S.E.
East Sparta, Ohio**

Description of proposed emissions unit(s):
State only PTI to modify a storage vessel VOC emissions which stores transmix materials. The tank is designated as T012(no. 766).

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described 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

Chris Korleski
Director

Marathon Pipe Line LLC
PTI Application: 15-01658
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 1576000788

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) 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.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of 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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

Marathon Pipe Line LLC
PTI Application: 15-01658

Facility ID: 1576000788

Issued: To be entered upon final issuance

conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

6. Permit Transfers

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

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

Marathon Pipe Line LLC
PTI Application: 15-01658
Issued: To be entered upon final issuance

Facility ID: 1576000788

9. Construction of New Sources(s)

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

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

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

Marathon Pipe Line LLC

Facility ID: 1576000788

PTI Application: 15-01658

Issued: To be entered upon final issuance

Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this

Emissions Unit ID: T012

permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. 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 this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

	<u>Tons Per Year</u>
VOC	9.43

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (T012) - 4.2 mmgallon transmix storage vessel

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	See section A.II.1 and A.I.2.a
40 CFR Part 60, Subpart Kb	See section A.I.2.b
40 CFR Part 63, Subpart CC	See section A.I.2.c
OAC rule 3745-21-09(L)	See section A.I.2.d

2. Additional Terms and Conditions

- 2.a Permit to Install 15-01658 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
 - a. submerged fill line during the tank loading operations; and
 - b. VOC emissions shall not exceed 10.0 tons/yr.
- 2.b 40 CFR Part 60.112b(a)(1)
The permittee shall employ a fixed roof in combination with an internal floating roof meeting the following specifications:
 - i. 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

Issued: To be entered upon final issuance

rapidly as possible.

- ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
 - (1) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid- filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
 - (2) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
 - (3) 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.
- iii. Each opening in a non-contact 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.
- iv. The cover or lid on 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 shall be equipped with a gasket.
- v. Automatic bleeder vents and rim space vents shall be equipped with a gasket.
- vi. 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.
- vii. 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

Emissions Unit ID: **T012**

a gasketed sliding cover.

viii Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

2.c 40 CFR Part 63.640(n)(1)

Subsequent to the compliance date(s) specified in 40 CFR Part 63.640(h), a Group 1 or Group 2 storage vessel that is part of an existing source and is also subject to the provisions of 40 CFR part 60, subpart Kb, is required to comply only with the requirements of 40 CFR part 60, subpart Kb except as provided in 40 CFR Part 63.640(n)(8). The exceptions specified in 40 CFR Part 63.640(n)(8) have been incorporated into these terms and conditions.

2.d The requirements of this applicable rule are less stringent than the requirements specified in 40 CFR Part 60, Subpart Kb.

2.e This storage vessel shall only be used for the storage of petroleum liquids with a maximum true vapor pressure of less than 11.1 psia.

2.f The permittee shall repair any of the following items or empty and remove the storage vessel from service within 45 days when they are discovered:

- i. The internal floating roof is not resting on the surface of the VOL inside the storage vessel; or
- ii. There is liquid accumulated on the roof; or
- iii. The seal is detached; or
- iv. There are holes or tears in the seal fabric,

II. Operational Restrictions

1. This storage vessel shall employ a submerged fill line during the tank loading operations.
2. The cover or lid on 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 maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

Issued: To be entered upon final issuance

3. Automatic bleeder vents 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.
4. Rim space vents shall be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the actual annual throughput, in either gallons per year or barrels per year for this emissions unit.
2. The permittee shall calculate and maintain records of the annual VOC emissions from this emissions unit. The actual annual throughput recorded for any calendar year shall be the basis for calculating the annual emissions of VOC by using the emissions estimation methodologies provided in the most current version of AP-42 or the most recent version of USEPA's TANKS computer program.
3. The permittee shall visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage vessel.
4. For Vessels equipped with a liquid-mounted or mechanical shoe primary seal, the permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill.
5. For vessels equipped with a double-seal system as specified in Sec. 60.112b(a)(1)(ii)(B), the permittee shall:
 - a. Visually inspect the vessel as specified in section A.III.6 above at least every 5 years; or
 - b. Visually inspect the vessel as specified in section A.III.4.
6. The permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal

Emissions Unit ID: **T012**

fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in sections A.III.4 and A.III.5.b and at intervals no greater than 5 years in the case of vessels specified in section A.III.5.a.

7. The permittee keep a record of each inspection performed as required by 40 CFR Part 60.113b (a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
8. The permittee shall maintain all records, except records specified in section A.III.9, for at least 2 years. Records specified in section A.III.9 shall be kept for the life of the facility.
9. The permittee shall maintain readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.
10. The permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.
11. The permittee shall notify the Administrator of US EPA and the Canton local air agency within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure of the VOL permitted for the storage vessel. Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below.
 - a. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.
 - b. For crude oil, refined petroleum products, and other liquids, the vapor pressure may be obtained from a source listed in 40 CFR Part 60.116b(e)(2).

Issued: To be entered upon final issuance

IV. Reporting Requirements

1. The permittee shall Notify the Administrator of US EPA and the Canton local air agency in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by sections A.III.3 and A.III.6 to afford the agency the opportunity to have an observer present. If the inspection required by section A.III.6 is not planned and the permittee could not have known about the inspection 30 days in advance or refilling the tank, the permittee shall notify the Administrator and the Canton local air agency at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator and the Canton local air agency at least 7 days prior to the refilling.
2. The permittee shall furnish the Administrator with a report that describes the control equipment and certifies that the control equipment meets the specifications of 40 CFR Part 60.112b(a)(1) and Part 60.113b(a)(1). This report shall be an attachment to the notification required by 40 CFR Part 60.7(a)(3).
3. If any of the conditions described in 40 CFR Part 60.113b(a)(2) are detected during the annual visual inspection required by 40 CFR Part 60.113b(a)(2), the permittee shall submit a report to the Administrator of US EPA and the Canton local air agency within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
4. After each inspection required by 40 CFR Part 60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR Part 60.113b(a)(3)(ii), the permittee shall submit a report to the Administrator of US EPA and the Canton local air agency within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR Part 61.112b(a)(1) or 40 CFR Part 60.113b(a)(3) and list each repair made.
5. If a failure detected during inspections required in section A.III.4 and cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator of US EPA in the inspection report required in 40 CFR Part 60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of

Emissions Unit ID: **T012**

actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

V. Testing Requirements

1. Compliance with the emission limitations and/or control measures in section A.I.1 and A.I.2 shall be determined in accordance with the following method(s):

- a. Emission limitation:

9.43 tpy VOC

Applicable compliance method:

Compliance shall be demonstrated by the implementation of the monitoring and record keeping requirements in section A.III.1 and A.III.2.

F. Miscellaneous Requirements

None