



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

7/26/2010

Certified Mail

William Patrie
Marathon Petroleum Company LLC - Canton Refinery
2408 Gambirinus Avenue SW
Canton, OH 44706

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1576002006
Permit Number: P0105568
Permit Type: Administrative Modification
County: Stark

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

Dear Permit Holder:

Enclosed please find a final 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. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

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 Kevin Boyce," 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
309 South Fourth Street, Room 222
Columbus, OH 43215

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. If you have any questions regarding this permit, please contact the Canton City Health Department. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

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



Response to Comments

Response to comments for: Permit-To-Install

Facility ID:	1576002006
Facility Name:	Marathon Petroleum Company LLC - Canton Refinery
Facility Description:	Petroleum Refinery
Facility Address:	2408 Gambrinus Avenue SW Canton, OH 44706 Stark County
Permit #:	P0105568, Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Canton Repository on 06/19/2010. The comment period ended on 07/19/2010.	
Hearing date (if held)	NA
Hearing Public Notice Date (if different from draft public notice)	NA

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

No comments were received.



FINAL

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

Marathon Petroleum Company LLC - Canton Refinery

Facility ID: 1576002006
Permit Number: P0105568
Permit Type: Administrative Modification
Issued: 7/26/2010
Effective: 7/26/2010



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

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Authorization

Facility ID: 1576002006
Facility Description: Petroleum Refinery
Application Number(s): M0000557, M0000796
Permit Number: P0105568
Permit Description: Administrative modification of PTI P0103855 to incorporate the hydrotreater outage plan per MPC's global settlement agreement, and lower the SO2 annual emissions limit.
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 7/26/2010
Effective Date: 7/26/2010

This document constitutes issuance to:

Marathon Petroleum Company LLC - 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 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

Chris Korleski
Director



Authorization (continued)

Permit Number: P0105568
Permit Description: Administrative modification of PTI P0103855 to incorporate the hydrotreater outage plan per MPC's global settlement agreement, and lower the SO2 annual emissions limit.

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

Emissions Unit ID:	P002
Company Equipment ID:	FCC Unit
Superseded Permit Number:	P0103855
General Permit Category and Type:	Not Applicable

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) The permittee must comply with all terms and conditions of this permit. 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 (i.e., postmarked) 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) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) 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.
- c) 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.
- d) 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 (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.)

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).

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 party 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 Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying 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.
- No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.
- 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 the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online 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 (i.e., postmarked), 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) None.

C. Emissions Unit Terms and Conditions



1. P002, FCC Unit

Operations, Property and/or Equipment Description:

Fluidized Catalytic Cracking Unit (FCCU) [Administrative Modification m4]

- 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 operations(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. 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) 40 CFR Part 60, Subpart A (40 CFR 60.1-19) 40 CFR Part 60, Subpart J (40 CFR 60.100-109)	71 lbs NO _x /hr, except as specified in b)(2)a. 72 ppmvd NO _x (0% O ₂) as a rolling, 7-day average limit, except as specified in b)(2)a. 52 ppmvd NO _x (0% O ₂) as a rolling, 365-day average limit, except as specified in b)(2)a. 90 ppmvd SO ₂ (0% O ₂) as a rolling, 7-day average limit, except as specified in b)(2)a. 45 ppmvd SO ₂ (0% O ₂) as a rolling, 365-day average limit, except as specified in b)(2)a. 0.9 lb PE per 1000 lbs coke burned See b)(2)b.
b.	OAC rule 3745-31-05(D)	63.1 tons PE/yr as a rolling, 12-month summation of emissions 100.0 tons SO ₂ /yr as a rolling, 12-month summation of emissions 64.5 tons of NO _x /yr as a rolling, 12-month summation of emissions 164.4 tons CO/yr as a rolling, 12-month summation of emissions
c.	OAC rule 3745-17-07(A)	Visible emissions shall not exceed 20% opacity as a 6-minute average, unless otherwise specified by the rule.
d.	OAC rule 3745-17-11(A)	The emissions limitation specified by this rule is less stringent than the standards established pursuant to 40 CFR Part 60, Subpart J.
e.	OAC rule 3745-18-82(E)(5)	The 0.62 lb SO ₂ /1000 lbs fresh feed emissions limitation specified by this rule is less stringent than the limits established

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		pursuant to OAC rule 3745-31-05(A)(3).
f.	40 CFR Part 60, Subpart J (40 CFR 60.100-109) [In accordance with 40 CFR 60.103(a), this emissions unit is defined as a fluid catalytic cracking unit catalyst regenerator, for which construction commenced after June 11, 1973 and before May 14, 2007, in a petroleum refinery.]	500 ppmvd CO as a 1-hour average [40 CFR 60.103(a)] See b)(2)c. The SO ₂ and particulate matter standards specified by this subpart are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).
g.	40 CFR Part 60, Subpart A (40 CFR 60.1-19)	General Provisions
h.	OAC rule 3745-21-09(T)	See b)(2)d.
i.	40 CFR Part 63, Subpart CC (40 CFR 63.640-679)	See b)(2)d.
j.	40 CFR Part 63, Subpart UUU (40 CFR 63.1560-1579)	See b)(2)e.
k.	40 CFR Part 63, Subpart A (40 CFR 63.1-16)	General Provisions See c)(1)

(2) Additional Terms and Conditions

- a. During periods of gas oil Hydrotreater (HT) outage as defined in the HT Outage Plan, the permittee may comply with the most recent version of the HT Outage Plan approved by U.S. EPA in lieu of the nitrogen oxides (NO_x) and sulfur dioxide (SO₂) emissions limits specified in b)(1)a.
- b. The rolling, 7-day and 365-day SO₂ and NO_x ppmvd and the 0.9 lb PE/1000 lbs coke burned limits were established as part of a Global Settlement Agreement dated August 28, 2001 between Marathon Petroleum Company, LLC (MPC) and the United States of America (Civil Case No. 01-40119 as filed on March 31, 2008) and were included in this PTI at the request of MPC.
- c. The carbon monoxide (CO) limit shall not apply during periods of startup, shutdown, or malfunction of the FCCU provided that during such times MPC shall, to the extent practical, maintain and operate the affected facility in a manner consistent with good air pollution control practices for minimizing emissions. Acceptable operation and maintenance procedures will be determined based on monitoring results, inspection of the source, and a thorough review of the current operation and maintenance procedures.
- d. The permittee shall comply with all applicable equipment leak terms and conditions found in OAC rule 3745-21-09(T) and 40 CFR 63.648.

- e. The permittee shall comply with all the applicable requirements, emissions limitations and work practice standards for existing sources in 40 CFR Part 63, Subpart UUU by no later than April 11, 2005 unless an extension of compliance is granted under Section 63.1563(c).
- c) Operational Restrictions
- (1) The permittee shall operate and maintain a flare system in accordance with 40 CFR Part 63, Subpart A, Section 63.11(b) to control emissions vented from the FCCU.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall operate and maintain a continuous opacity monitoring system (COMS), pursuant to the requirements of 40 CFR Part 51, Appendix P and 40 CFR Part 60, Subpart A, Section 60.13, to continuously monitor and record the opacity of particulate emissions (PE) from this emissions unit in units of percent opacity.
 - a. The permittee shall maintain records of all data obtained by the COMS including percent opacity on an instantaneous (1-minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude calibration adjustments. Records shall be maintained at the facility for a period of not less than three years.
 - b. A statement of certification of the existing COMS shall be maintained on site and shall include a letter from the Ohio EPA detailing the results of an agency review of the certification tests and a statement by Ohio EPA that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.
 - (2) The permittee shall operate and maintain a continuous emissions monitoring system (CEMS), in accordance with 40 CFR Part 60, Subpart A, Section 60.13, to continuously monitor and record oxygen (O₂) emissions from this emissions unit in units of percent oxygen.
 - a. The permittee shall maintain records of all data obtained by the O₂ CEMS including, but not limited to, percent O₂ on an instantaneous (1-minute) basis, results of daily zero/span calibration checks, and magnitude of manual calibration. Records shall be maintained at the facility for a period of not less than three years.
 - b. A statement of certification of the existing O₂ CEMS shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 3. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

- (3) The permittee shall operate and maintain a continuous emissions monitoring system (CEMS), pursuant to the requirements of 40 CFR Part 60, Subpart A, Section 60.13 and Subpart J, Section 60.105(a)(2), to continuously monitor and record CO emissions from this emissions unit in units of parts per million by volume on a dry basis (ppmvd).
- a. The permittee shall maintain records of all data obtained by the CO CEMS including, but not limited to, CO in units of ppmvd on an instantaneous (1-minute) basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments. Records shall be maintained at the facility for a period of not less than three years.
 - b. A statement of certification of the existing CO CEMS shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 4 and 40 CFR Part 60, Appendix F, Procedure 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.
- (4) The permittee shall operate and maintain continuous emissions monitoring system (CEMS) in accordance with 40 CFR Part 60, Subpart A, Section 60.13, to continuously monitor and record SO₂ emissions from this emissions unit in units of parts per million by volume on a dry basis (ppmvd).
- a. The permittee shall maintain records of all data obtained by the SO₂ CEMS including, but not limited to, SO₂ in units of ppmvd on an instantaneous (1-minute) basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments. Records shall be maintained at the facility for a period of not less than three years.
 - b. A statement of certification of the existing SO₂ CEMS shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 6 and 40 CFR Part 60, Appendix F, Procedure 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.
- (5) The permittee shall operate and maintain continuous emissions monitoring system (CEMS) in accordance with 40 CFR Part 60, Subpart A, Section 60.13, to continuously monitor and record NO_x emissions from this emissions unit in units of parts per million by volume on a dry basis (ppmvd).
- a. The permittee shall maintain records of all data obtained by the NO_x CEMS including, but not limited to, NO_x in units of ppmvd on an instantaneous (1-minute) basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments. Records shall be maintained at the facility for a period of not less than three years.

- b. A statement of certification of the existing NO_x CEMS shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 6 and 40 CFR Part 60, Appendix F, Procedure 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.
- (6) The permittee shall maintain hourly records of the NO_x emissions in lbs/hr as calculated based on the ppmvd data recorded by the CEMS.
 - (7) The permittee shall maintain daily records of the NO_x and SO₂ emissions (in ppmvd) calculated by rolling, 7-day and 365-day averages.
 - (8) The permittee shall maintain daily records of the average coke burn-off rate (tons per hour) and hours of FCCU operation pursuant to 40 CFR Part 60, Subpart J, Section 60.105(c).
 - (9) The permittee shall maintain monthly records of the PE, NO_x, SO₂, and CO emissions (in tons per year) calculated by rolling, 12-month summation.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all instances of:
 - a. emissions in excess of any applicable limit specified in Section C.1.b)(1) of this permit, including:
 - i. the date that the exceedance occurred;
 - ii. an explanation of the exceedance;
 - iii. the duration of the exceedance;
 - iv. whether the exceedance was concurrent with a startup, shutdown, or malfunction of an affected facility or control system; and
 - v. a description of the corrective action taken, if any, and the root cause analysis, if applicable.
 - b. flare system operational noncompliance with Section C.1.c)(1) of this permit.
 - (2) The permittee shall comply with the continuous monitoring device excess emissions and monitoring systems performance reporting requirements pursuant to 40 CFR Part 60, Subpart A, Sections 60.7(c) and (d), and Subpart J, Section 60.105(e).
 - (3) The quarterly deviation and excess emissions reports shall be submitted to the appropriate Ohio EPA District Office or local air agency by January 30th, April 30th, July 30th, and October 30th of each year and shall address the data obtained during the

previous calendar quarter. If no deviations occurred during the reporting period, a report shall be submitted stating such information.

f) Testing Requirements

(1) Compliance with the emissions limitations specified in Section C.1.b)(1) of this permit shall be determined in accordance with the following methods:

a. Emissions Limitation:

20% opacity as a 6-minute average, except as provided by rule

Applicable Compliance Method:

The monitoring and record keeping requirements in Section C.1.d)(1) shall be used to demonstrate compliance. If required, Method 9 of 40 CFR Part 60, Appendix A shall be used to demonstrate compliance.

b. Emissions Limitation:

90 ppmvd SO₂ (0% O₂) as a 7-day rolling average

45 ppmvd SO₂ (0% O₂) as a 365-day rolling average

100.0 tons SO₂ per year as a rolling, 12-month summation

Applicable Compliance Method:

The monitoring and record keeping requirements in Sections C.1.d)(4) and (7) shall be used to demonstrate compliance with the 7-day rolling average and 365-day rolling average ppmvd SO₂ emissions limitations.

The total monthly SO₂ emissions shall be calculated as shown below:

(Average daily SO₂ emissions rate in tons SO₂/day calculated from the CEMS data) x (number of operating days for the FCCU per month) = (total calculated monthly SO₂ emissions in tons SO₂/month)

The permittee shall calculate a rolling, 12-month summation of the total SO₂ emissions to comply with the annual limitation.

c. Emissions Limitation:

71 lbs NO_x per hour

72 ppmvd NO_x (0% O₂) as a 7-day rolling average

52 ppmvd NO_x (0% O₂) as a 365-day rolling average

64.5 tons NO_x per year as a rolling, 12-month summation

Applicable Compliance Method:

The monitoring and record keeping requirements in Sections C.1.d)(5) through (7) shall be used to demonstrate compliance with the hourly, 7-day rolling average, and 365-day rolling average NO_x emissions limitations.

The total monthly NO_x emissions shall be calculated as shown below:

(Average daily NO_x emissions rate in tons NO_x/day calculated from the CEMS data) x (number of operating days for the FCCU per month) = (total calculated monthly NO_x emissions in tons NO_x/month)

The permittee shall calculate a rolling, 12-month summation of the total NO_x emissions to comply with the annual limitation.

d. Emissions Limitation:

500 ppmvd CO as a 1-hour average

164.4 tons CO per year as a rolling, 12-month summation

Applicable Compliance Method:

The monitoring and record keeping requirements in section C.1.d)(3) shall be used to demonstrate compliance with the 1-hour average ppmvd CO emissions limitation. If required, the permittee shall demonstrate compliance with the 500 ppmvd CO as a 1-hour average in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Method 10. An alternative US EPA approved test method may be used with prior approval from Ohio EPA.

The total monthly CO emissions shall be calculated as shown below:

(Average daily CO emissions rate in tons CO/day calculated from the CEMS data) x (number of operating days for the FCCU per month) = (total calculated monthly CO emissions in tons CO/month)

The permittee shall calculate a rolling, 12-month summation of the total CO emissions to comply with the annual limitation.

e. Emissions Limitation:

0.9 lb PE per 1000 lbs coke burned in the FCCU

63.1 tons PE per year as a rolling, 12-month summation

Applicable Compliance Method:

The calculation procedures specified in 40 CFR Part 60, Subpart J, Section 60.106(b) shall be used to demonstrate compliance with the emissions limit of 0.9 lb PE per 1000 lbs of coke burned in the FCCU on a daily basis. If required, the permittee shall conduct performance tests in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 5B



and 5F, and 40 CFR 60.106(b). An alternative US EPA approved test method may be used with prior approval from Ohio EPA.

The total monthly PE emissions shall be calculated as shown below:

(Average daily PE emissions rate in tons PE/day calculated using the procedure specified in 40 CFR Part 60.106) x (number of operating days for the FCCU per month) = (total calculated monthly PE emissions in tons PE/month)

The permittee shall calculate a rolling, 12-month summation of the total PE emissions to comply with the annual limitation.

g) Miscellaneous Requirements

- (1) None.