



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

9/6/2011

Certified Mail

William Patrie
Marathon Petroleum Company LP - Canton Refinery
2408 Gambinus Avenue SW
Canton, OH 44706

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1576002006
Permit Number: P0106558
Permit Type: OAC Chapter 3745-31 Modification
County: Stark

Dear Permit Holder:

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

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Canton City Health Department at (330)489-3385.

Sincerely,

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

Cc: U.S. EPA Region 5 -Via E-Mail Notification
Canton; Pennsylvania; West Virginia



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

The Marathon Petroleum Company LP (MPC) petroleum refinery in Canton, Ohio submitted an application to establish a refinery-wide fugitive volatile organic compound (VOC) emissions limit. The fugitive components at the Canton Refinery include all valves, pumps, pressure relief devices (that vent to atmosphere), connectors, and potential open-ended lines in regulated service. The existing emissions units and corresponding Permits-to-Install (PTIs) that contain allowable emission limits on fugitive components at the refinery are summarized below:

EU ID	Description	PTI #
P013	Fugitive VOC Leaks from Petroleum Refinery Equipment: Vacuum Unit Tailgas Compressor System, West Tank Farm, and Gas Con Debutanizer Overhead Air Cooled Exchanger	15-01531
P014	Hydrofluoric Alkylation Acid Regenerator Tower and Isobutane Vaporizer	15-1367
P015	Flare Header Accumulator System	15-606
P022	VOC Emissions from the Crude Unit, FFC Unit, and Vacuum Unit Resulting from the 2003/2004 TAR Project	15-01544
B033	Ultra Low Sulfur Diesel (ULSD) Process Fugitive Components	P0103891

Many of the sources at the refinery are still considered “grandfathered” sources [i.e. sources not constructed/modified/replaced after January 1, 1974, per the new source definition in OAC 3745-31-01(UUU)], and, as such, do not have PTIs. Therefore, the Canton Refinery currently does not have a facility-wide fugitive emission limit that encompasses all existing fugitive components.

Normal operation of the refinery involves the addition and/or replacement of components over time to assure safe and proper operation of the processes. Classifying the changes as de minimis would result in an excessive recordkeeping burden requiring components of each change to be handled separately. Each time MPC would like to install new or replace existing fugitive components (resulting in minor emissions increases), a permit applicability determination is required, potentially delaying the installation of these components. A facility-wide emission limit would allow MPC to avoid performing cumbersome permit applicability determinations for the installation of fugitive components, unless they are part of a larger project that could potentially trigger requirements not previously applicable [e.g., major new source review (NSR)].

3. Facility Emissions and Attainment Status:

The Canton Refinery is located in Stark County, which is in attainment with all National Ambient Air Quality Standards (NAAQS), with the exception of particulate matter with an aerodynamic diameter of 2.5 microns or less (PM_{2.5}). Petroleum refineries are classified as one of the 28 listed source



categories in OAC 3745-31-01(LL)2(a) and, therefore, have a 100 tons per year (tpy) Prevention of Significant Deteriorations (PSD) "major" source threshold. The potential to emit (PTE) of both PM2.5 and sulfur dioxide (SO2) at the Canton Refinery is greater than 100 tpy. Therefore, the facility is considered to be an existing major source with regards to both the PSD and Nonattainment New Source Review (NANSR) programs. PSD can be triggered only if the emissions increase from the proposed project exceeds the Significant Emission Rate (SER) threshold. The only criteria pollutant with emission increases from this project is VOC. The requested allowable VOC emissions increase is 37.4 tpy, which is below the applicable VOC PSD SER of 40 tpy. Therefore, the proposed project is not subject to PSD review. The proposed project will not cause an increase in SO2 or direct PM2.5 emissions. Thus, NANSR for PM2.5 is not applicable to the proposed project.

4. Source Emissions:

MPC's estimated facility-wide fugitive PTE is 666.1 tpy VOC as determined from the Canton Refinery's fugitive component count as of July 2009 and MPC's derived PTE emission factors for each component type, as well as the existing allowable emission limits for the fugitive components already permitted. With this PTI application, MPC is requesting an allowable VOC emission limit of 703.5 tpy. The requested allowable refinery-wide VOC emissions limit has been calculated by adding 37.4 tons to the current facility-wide fugitive PTE in order to remain below the Prevention of Significant Deterioration (PSD) major modification threshold. It is also important to note that as a result of this permitting action, MPC confirmed that historical projects involving component installations would not have triggered major NSR when recalculating the emission increases from those fugitive components using the new, proposed PTE emission factors developed as a part of this permit application.

5. Conclusion:

The net emission increase associated with PTI P0106558 will not result in a significant net emissions increase, and is, therefore, not subject to PSD review.

6. Please provide additional notes or comments as necessary:

MPC is voluntarily restricting the refinery-wide fugitive VOC emissions to the more stringent 40 CFR Part 60, Subpart GGGa requirements, even though a portion of the fugitive VOC emissions are subject to 40 CFR Part 60, Subpart GGG requirements.

PTI P0106558 incorporates a similar fugitive component permitting strategy implemented by Ohio EPA for Sunoco Chemicals, Inc. (Facility ID 0773000080) in PTI 07-00500.

PTI P0106558 will supersede and incorporate, as necessary, any of the applicable fugitive VOC requirements from existing Canton Refinery permits such that the old PTIs may be revoked or modified.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Table with 2 columns: Pollutant, Tons Per Year. Row 1: VOC, 703.5

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
Marathon Petroleum Company LP - Canton Refinery

Issue Date: 9/6/2011

Permit Number: P0106558

Permit Type: OAC Chapter 3745-31 Modification

Permit Description: Ch.31 modification of PTI 15-01531 to establish a facility-wide fugitive VOC emissions limit for the Canton Refinery incorporating grandfathered sources and fugitive components previously permitted under separate emissions units.

Facility ID: 1576002006

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

Facility Description: Petroleum Refineries

The Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Abbie Gurdy at Canton City Health Department, 420 Market Avenue, Canton, OH 44702-1544 or (330)489-3385 . The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



DRAFT

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

Marathon Petroleum Company LP - Canton Refinery

Facility ID: 1576002006
Permit Number: P0106558
Permit Type: OAC Chapter 3745-31 Modification
Issued: 9/6/2011
Effective: To be entered upon final issuance



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): A0038412, A0041492
Permit Number: P0106558
Permit Description: Ch.31 modification of PTI 15-01531 to establish a facility-wide fugitive VOC emissions limit for the Canton Refinery incorporating grandfathered sources and fugitive components previously permitted under separate emissions units.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$1,250.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 9/6/2011
Effective Date: To be entered upon final issuance

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 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

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0106558

Permit Description: Ch.31 modification of PTI 15-01531 to establish a facility-wide fugitive VOC emissions limit for the Canton Refinery incorporating grandfathered sources and fugitive components previously permitted under separate emissions units.

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

Emissions Unit ID:	P801
Company Equipment ID:	Refinery-Wide Fugitive VOC Emissions
Superseded Permit Number:	15-01531
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) [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.

C. Emissions Unit Terms and Conditions



1. P801, Refinery-Wide Fugitive VOC Emissions

Operations, Property and/or Equipment Description:

Refinery-wide fugitive volatile organic compounds (VOC) emissions from all valves, pumps, compressors, pressure relief devices (that vent to the atmosphere), connectors, and potential open-ended lines in regulated service (previously numbered as P013).

- 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.

Table with 3 columns: Label, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-31-05(F), 3745-21-09(T), 40 CFR Part 60, Subpart A, 40 CFR Part 60, Subpart GGGa, 40 CFR Part 63, Subpart A, 40 CFR Part 63, Subpart CC, and 40 CFR Part 63, Subpart TT.

- (2) Additional Terms and Conditions
a. Installation of and modification to equipment included in this emissions unit shall not require a PTI pursuant to OAC rule 3745-31 solely as a result of increases in fugitive emissions unless and until the calculated facility-wide potential fugitive emissions equals or exceeds the facility-wide allowable fugitive emission limit.
b. The permittee shall consider only those fugitive emissions from the emissions unit being installed (i.e., not facility-wide fugitive emissions) when determining applicability under OAC 3745-31-11 through OAC 3745-31-20.



- c. The permittee is voluntarily restricting the entire emission unit to the more stringent 40 CFR Part 60, Subpart GGGa requirements, even though a portion of the emission unit is subject to the requirements of 40 CFR Part 60, Subpart GGG.
- d. BAT for the control of fugitive VOC emissions from fugitive components shall be satisfied through implementation of and compliance with the permittee's approved Leak Detection and Repair (LDAR) Program. The permittee's LDAR program shall address the requirements of OAC rule 3745-21-09(T), 40 CFR Part 60, Subpart GGGa, and 40 CFR Part 63, Subparts CC and TT.
- e. In the PTI application for P0106558 submitted on 07/02/2010, Marathon Petroleum Company, LP (MPC) identified the applicable Maximum Achievable Control Technology (MACT) and New Source Performance Standards (NSPS) requirements as they apply to fugitive components within each specific process unit.

The rule applicability provided by MPC is subject to change in the future based on new/revised regulations. The applicability documented in the PTI application and the current refinery-wide LDAR program is effective for the duration of this permit. The permittee will notify the appropriate Ohio EPA District Office or local air agency if any new rule other than those listed in section b)(1) becomes applicable. This does not release the permittee from the obligation to comply with all applicable requirements.

- f. The terms and conditions for this emissions unit as specified in Permit to Install (PTI) P0106558 supersede all the terms and conditions specified in PTI 15-01531 dated March 27, 2003 (for EU P013), PTI 15-1367 dated April 28, 1999 (for EU P014), PTI 15-606 dated October 31, 1990 (for EU P015), and PTI 15-01544 dated November 13, 2003 (for EU P022), and all previous modifications to, and including, the initial installation permits.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) See 40 CFR Part 60, Subpart GGGa (40 CFR 60.590a - 593a).
- (2) See 40 CFR Part 63, Subpart TT (40 CFR 63.1000 - 1018).
- (3) See 40 CFR Part 63, Subpart CC (40 CFR 63.640 - 679).
- (4) See Global Settlement Agreement (GSA) dated August 28, 2001, between MPC and the United States of America Civil No. 01-401190, as revised on March 31, 2008, and June 30, 2010.

e) Reporting Requirements

- (1) See 40 CFR Part 60, Subpart GGGa (40 CFR 60.590a - 593a).



- (2) See 40 CFR Part 63, Subpart TT (40 CFR 63.1000 - 1018).
- (3) See 40 CFR Part 63, Subpart CC (40 CFR 63.640 - 679).
- (4) See Global Settlement Agreement (GSA) dated August 28, 2001, between MPC and the United States of America Civil No. 01-401190, as revised on March 31, 2008, and June 30, 2010.

f) Testing Requirements

- (1) Compliance with the applicable emissions limitations/control measures in b)(1) shall be determined in accordance with the following methods:

a. Emissions Limitations:

703.5 tons VOC/yr

Applicable Compliance Methods:

The potential facility-wide fugitive emissions shall be calculated using the following methodology:

The potential facility-wide fugitive emissions are based upon the sum of potential fugitive emissions from components in each emissions unit at the facility. These components include all valves, pumps, pressure relief valves, connectors, open-ended lines, and sampling connections in regulated service at the facility. Potential fugitive emissions are calculated using the facility component count, component service type, and PTE fugitive emission factors. The potential fugitive emissions can be calculated by multiplying all the components in a given service type by the respective PTE fugitive emission factor as listed in the table below. The summation of emissions from all components in each service type is the facility-wide potential fugitive emissions.

Component Type	Chemical State	Emission Factor (lb/hr)
Monitored or Unmonitored Components^a		
Compressor	GV	1.56
Connector	HL	0.000612
Connector	LL	0.000612
Pressure Relief Device (vented to atmosphere)	LL	0.00563
Pressure Relief Device (vented to atmosphere)	GV	0.392
Monitored Components^a		
Connector	GV	0.00023
Valve	GV	0.00318
Valve	LL	0.00299
Valve	HL	0.000563
Potential Open-Ended Line	GV	0.000980
Potential Open-Ended Line	LL	0.000922



Pump	HL	0.0426
Pump	LL	0.0647
Unmonitored Components^a		
Connector	GV	0.000612
Valve	GV	0.06565
Valve	LL	0.0267
Valve	HL	0.000563
Potential Open-Ended Line	GV	0.00563
Potential Open-Ended Line	LL	0.00563
Pump	HL	0.0514
Pump	LL	0.279

^aThe emission factors presented for "monitored components" in this table reference components at the Canton Refinery that will be included in the refinery's LDAR Plan and for which some form of periodic monitoring (i.e., quarterly, semiannual, annual, etc.) will be required by the LDAR Plan. "Unmonitored components" are those components that do not meet the definition of "monitored components."

- g) Miscellaneous Requirements
 - (1) None.