GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code

(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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION 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 permit and all applicable air pollution laws and regulations.

Facility Name: **Marathon Ashland Petroleum LLC-Canton**
Application Number: **15-1367**
Date: **April 28, 1999**

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Marathon Ashland Petroleum LLC-Canton** located in **Stark** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P021 (MOD)	Fugitive OC and HF leaks from the Hydrofluoric Alkylation Acid Regenerator Tower and Isobutane Vaporizer (This is a modification of this emissions unit by adding on to the allowable emissions the fugitive OC emissions generated by upgrading the hydrofluoric (HF) acid alkylation unit by enhancing the present refinery prevention, detection, and	Compliance with OAC rule 3745-21-09(T) and the terms of this permit	3745-31-05	OC: 1 pound/hour (0.6 pound/hour from this modification); 4.28 tons/year (2.58 tons/year from this modification) HF: 0.25 pound/hour; 1.1 tons/year
			3745-21-09(T)	No limits, See Additional Special Terms and Conditions

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P021 MOD cont'd	mitigation (PDM) systems. This project will result in an increase in the amount of fugitive OC emissions. This emissions unit had a prior PTI 15-585.)			

SUMMARY *
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
OC	4.28
HF	1.1

* Note: The information contained under the Summary of Emissions section of the Permit to Install is for informational purposes only and is not enforceable.

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Canton Air Pollution Control, 420 Market Avenue North, Canton, Ohio 44702-1544**.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Canton Air Pollution Control, 420 Market Avenue North, Canton, Ohio 44702-1544**.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Operational Restrictions:

1. None.

B. Monitoring and/or Recordkeeping Requirements:

1. As required in OAC 3745-21-09(T), the permittee shall develop and implement a monitoring program which incorporates the following provisions:

   a. yearly monitoring of all pump seals, pipeline valves in liquid service and process drains in accordance with the method specified in paragraph (F) of OAC 3745-21-10;

   b. quarterly monitoring of all compressor seals, pipeline valves in gas service and pressure relief valves in gas service in accordance with the method specified in paragraph (F) of OAC 3745-21-10;

   c. monthly monitoring of all pump seals by visual methods;

   d. monitoring of any pump seal in accordance with the method specified in paragraph (F) OAC 3745-21-10 within five working days after any liquids are observed dripping from the seal;

   e. monitoring of any relief valve in accordance with the method specified in paragraph (F) of OAC 3745-21-10 within five working days after the valve has vented to the atmosphere; and,

   f. monitoring of any component in accordance with the method specified in paragraph (F) of 3745-21-10 within five working days after the repair of a leak.

2. As required by OAC 3745-21-09(T), all pipeline valves in gas service and pressure relief valves in gas service shall be clearly marked and identified in such a manner that they will be obvious to both refinery personnel performing monitoring and to the director.

3. As required by OAC 3745-21-09(T), if a leak is identified as a result of the monitoring program required by Term and Condition B.1 and the concentration of VOC exceeds ten thousand parts per million by volume, a tag shall immediately be placed on the leaking component. The tag shall be readily visible and weatherproof; it shall bear an identification number; and it shall clearly indicate the date the leak was detected. The tag shall remain in place until the leaking component is repaired.

4. As required by OAC 3745-21-09(T), a monitoring log shall be maintained for all leaking components which are tagged in accordance with Term and Condition B.3 of this rule. The monitoring log shall contain, at a minimum, the following data:

   a. the name of the process unit where the leaking component is located;

   b. the type of leaking component (such as valve, seal, or other component);

   c. the tag number of the leaking component;

   d. the date on which the leaking component was detected;

   e. the date on which the leaking component was repaired;

   f. the date and results of the monitoring performed within five working days after the leaking component was repaired;

   g. a record of the calibration of the monitoring instrument;

h. a list of those leaking components which cannot be repaired until the next process unit turnaround; and,

i. the total number of components monitored and the total number of components found leaking during the calendar year.

5. As required by OAC 3745-21-09(T), a copy of any monitoring log shall be retained by the permittee for a minimum of two years after the date on which the record was made or the report was prepared. A copy of any monitoring log shall immediately be made available to the Canton LAA upon verbal or written request, at any reasonable time.

6. As required by OAC 3745-21-09(T), the permittee shall repair and retest any leaking component which is tagged and identified in accordance with Term and Condition B.3 as soon as possible, but no later than 15 days after the leak is found unless the leaking component cannot be repaired until a process turnaround occurs.

7. As stated in OAC 3745-21-09(T), the director may require a process unit turnaround to occur earlier than the normally scheduled date if the number and severity of leaking components awaiting a turnaround warrant such action. Any such process unit turnaround shall be required by means of an order issued by the director to the permittee of the petroleum refinery pursuant to Division (R) of Section 3704.03 of the Revised Code.

8. As stated in OAC 3745-21-09(T), the director may accept an alternative monitoring, record keeping and reporting program to replace that required by Term and Condition B.1 if the owner or operator of a petroleum refinery can demonstrate to the satisfaction of the director that the alternative program is at least as effective in identifying, documenting and reporting leaks from petroleum refinery equipment as the program outlined in

term and Condition B.1 of this rule. For purposes of this paragraph, any proposed alternative program which the director finds comparable to the requirements of OAC 3745-21-09(DD)(12) or (DD)(13) shall be acceptable to the director.

C. Reporting Requirements:

1. The permittee shall submit a quarterly report which identifies the following during the previous three calendar months:

   a. the total number of components monitored;

   b. the total number of components found to be leaking;

   c. the identity of components which were found to be leaking and which were not repaired within fifteen days; and,

   d. the identity of all leaking components which cannot be repaired until the next process turnaround.

2. The permittee is already submitting a report for fugitive VOC leaks from components in the rest of the facility. The permittee is not required to submit a separate report for the components associated with this emissions unit (Hydrofluoric Alkylation Acid Regenerator Tower and Isobutane Vaporizer) but can simply include them into this existing report.

3. This report shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue N., Canton Ohio 44702. The reports shall be submitted quarterly, i.e., by January 15, April 15, July 15, and October 15 of each year and shall cover the previous calendar quarters.

D. Compliance Methods and Testing Requirements:

1. Compliance with the emission limitation(s) of this permit shall be determined in accordance with the following method(s):

a. Emission Limitation

4.28 tons OC/yr

Applicable Compliance Method

This limit is for the fugitive organic compound emissions from valves, pumps/compressors, drains, relief valves and flanges. Using emission factors from AP-42 Table 9.1-2 (10/80 edition) and taking into account emission reduction efficiency values taken from EPA-450/3-81-015a this emissions unit should have emissions of less than 4.28 tons OC/yr. The emission reduction efficiency values are based on the fact that this equipment must be meet the operational and monitoring/record keeping requirements of this permit.

b. Emission Limitation

1 pound OC/hr

Applicable Compliance Method

This limit is for the fugitive organic compound emissions from valves, pumps/compressors, drains, relief valves and flanges. Using emission factors from AP-42 Table 9.1-2 (10/80 edition) and taking into account emission reduction efficiency values taken from EPA-450/3-81-015a this emissions unit should have emissions of less than 1 pound OC/hr. The emission reduction efficiency values are based on the fact that this equipment must be meet the operational and monitoring/record keeping requirements of this permit.

c. Emission Limitation

0.25 pound HF/hour

Applicable Compliance Method

This limit is for the fugitive organic compound emissions from valves, pumps/compressors, drains,

relief valves and flanges. Using emission factors from AP-42 Table 9.1-2 (10/80 edition) and taking into account emission reduction efficiency values taken from EPA-450/3-81-015a this emissions unit should have emissions of less than 0.25 pound HF/hr. The emission reduction efficiency values are based on the fact that this equipment must be meet the operational and monitoring/record keeping requirements of this permit.

d. Emission Limitation

1.1 tons HF/year

Applicable Compliance Method

This limit is for the fugitive organic compound emissions from valves, pumps/compressors, drains, relief valves and flanges. Using emission factors from AP-42 Table 9.1-2 (10/80 edition) and taking into account emission reduction efficiency values taken from EPA-450/3-81-015a this emissions unit should have emissions of less than 1.1 tons HF/yr. The emission reduction efficiency values are based on the fact that this equipment must be meet the operational and monitoring/record keeping requirements of this permit.

E. Miscellaneous Requirements:

1. None.