



State of Ohio Environmental Protection Agency

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RE: FINAL PERMIT TO INSTALL MODIFICATION

CERTIFIED MAIL

LICKING COUNTY

Application No: 01-07392

Fac ID: 0145010219

DATE: 11/7/2006

Marathon Pipe Line LLC
Gary Wilson
539 S Main St
Findlay, OH 45840

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action of the Director is final 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 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

Sincerely,

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

CC: USEPA

CDO



FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-07392

Application Number: 01-07392
Facility ID: 0145010219
Permit Fee: **\$375**
Name of Facility: Marathon Pipe Line LLC
Person to Contact: Gary Wilson
Address: 539 S Main St
Findlay, OH 45840

Location of proposed air contaminant source(s) [emissions unit(s)]:
840 Heath Rd
Heath, Ohio

Description of proposed emissions unit(s):
modification to existing PTI terms and conditions.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions

may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

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

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

14. Construction Compliance Certification

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

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	37.28
Single HAP	9.8
Total HAPs	24.5

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
J001 - 2 - bay truck loading rack for gasoline controlled by a McGill carbon adsorption / absorption vapor recovery unit (VRU)	OAC rule 3745-31-05(A)(3)	See A.2.a 0.29 pound of VOC per 1,000 gallons of gasoline loaded into the delivery vessel; 43.7 lbs VOC/hour; Total VOC emissions from this emissions unit shall not exceed 37.28 tons VOC/year, as a rolling, 12-month summation;
	OAC rule 3745-21-09(Q)	The emission limitation specified in this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-35-07	The individual and combined HAP emissions from all emissions units at this facility shall not exceed 9.8 tons per year and 24.5 tons per year, respectively, as rolling, 12-month summation.

2. Additional Terms and Conditions

- 2.a The "Best Available Technology" (BAT) requirement for this emissions unit has been determined to be use of a carbon adsorption/absorption vapor recovery unit with a minimum control efficiency of 95%.

B. Operational Restrictions

1. The loading rack shall be equipped with a vapor collection system whereby during the transfer of gasoline to any delivery vessel:
 - a. all vapors displaced from the delivery vessel during loading are vented only to the vapor collection system; and
 - b. The pressure in the vapor collection system is maintained between minus 6 and plus 18 inches of water gauge pressure
2. The loading rack shall be equipped with a vapor control system whereby:
 - a. all vapors collected by the vapor collection system are vented to the vapor control system;
 - b. the mass emissions of VOC from the vapor control system do not exceed 0.29 pound of VOC per 1000 gallons (35 milligrams of VOC per liter) of gasoline loaded into the delivery vessel; and,
 - c. any liquid gasoline returned to a stationary storage tank from the vapor control system is free of entrained air to the extent possible with good engineering design.
3. A means shall be provided to prevent drainage of gasoline from the loading device when it is not in use or to accomplish complete drainage before the loading devices is disconnected.
4. All gasoline loading lines and vapor lines shall be equipped with fittings which are vapor tight.
5. The permittee shall not permit gasoline to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.
6. The permittee shall repair within 15 days any leak from the vapor collection system and vapor control system when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.
7. The maximum annual throughput rate for this emission unit shall not exceed the following: gasoline shall not exceed 255,550,000 gallons per year, fuel oil No. 2 shall not exceed 110,000,000 gallons per year, kerosene shall not exceed 73,000,000 gallons per year, ethanol shall not exceed 30,000,000 gallons per year.

Following issuance of this permit, compliance with the annual gasoline, fuel oil No. 2, kerosene, and ethanol throughput limitations shall be based upon a rolling, 12 - month summation. The permittee has submitted adequate previous 12-month totals along with the most recent monthly totals to show compliance.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the total throughput, in gallons, of gasoline fuel oil No. 2, kerosene, and ethanol for each month;
 - b. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain records of the cumulative total throughput, in gallons, of gasoline fuel No. 2, kerosene, and ethanol for each calendar month;
 - c. after the first 12 calendar months of operation following the issuance of this permit, the permittee shall maintain the rolling, 12-month summation of the total gasoline fuel oil No. 2, kerosene, and ethanol throughput, in gallons;
 - d. the total VOC emissions from this emissions unit, in tons; and,
 - e. the total HAP (individual and combined) and VOC emissions from all emissions units at the facility, in tons.
2. When operating the Carbon Adsorber to control VOC emissions at the truck loading rack, the carbon bed shall be regenerated once every fifteen (15) minutes during active vapor processing. The Permittee shall monitor and continuously record the carbon bed pressure either on a strip chart or on digital media indicating the regeneration cycle. The Permittee shall conduct a monthly inspection of the continuous carbon bed pressure records for any deviations in the carbon bed regeneration cycle time and pressure since the last monthly inspection. The Permittee shall, on days the facility is staffed, also review and record the maximum vacuum achieved during a single cycle if vapor processing is occurring. [Observed deviations of the VRU operating parameters are not necessarily indicative of a violation of the allowable mass emission limitation (80 mg/1), but rather serve as a trigger level for maintenance and/or repair activities, or further investigation to establish correct operation.]

D. Reporting Requirements

1. The permittee shall submit semi-annual deviation (excursion) reports which identify all exceedances of the following:
 - a. the rolling, 12-month limitations on the throughput of gasoline, fuel oil No. 2, kerosene, and ethanol; and,
 - b. the rolling, 12-month emission limitations for VOC.

The reports shall also document the cause of each exceedance and an explanation of any corrective actions which have been taken or will be taken to prevent a similar exceedance in the future.

If no deviations occurred during the 6-month period, the permittee shall submit a semi-annual report which states that no deviations occurred during that 6-month period. These reports shall be submitted by May 1 and November 1 of each year and shall address the data obtained during the previous 6-month calendar period (January 1 through June 30 and July 1 through December 31, respectively).

2. The permittee shall submit annual reports of the total gasoline, fuel oil No. 2, kerosene, and ethanol throughputs, in gallons, and the total VOC emissions during the calendar year for this emissions unit, and the total individual and combined HAP emissions. These annual reports shall be submitted by May 1 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation

9.8 TPY for any single HAP and 24.6 TPY for any combination of HAPs.

Applicable Compliance Method

For each individual HAP multiply the following emission factors from the Gasoline Distribution Industry (Stage I) - Background Information for Proposed Standards Draft Report by the actual annual VOC emissions rate for the year (in TPY) for all emission units at the facility:

hexane - 0.016 pound of hexane emissions per pound of VOC;

benzene- 0.009 pound of benzene emissions per pound of VOC;

toluene- 0.013 pound of toluene emissions per pound of VOC;

2, 2, 4 Trimethylpentane - 0.008 pound of 2,2,4 trimethylpentane emissions per pound of VOC.

xylene - 0.005 pound of xylene emissions per pound of VOC; and,

ethylbenzene- 0.001pound of ethylbenzene emissions per pound of VOC.

For the combination of HAPs, sum the calculated annual emission rates for the individual HAPs.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA and Marathon Pipe Line LLC.

b. Emission Limitation

0.292 pound of VOC per 1,000 gallons of gasoline loaded into the delivery vessel

Applicable Compliance Method

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. the emission testing shall be conducted within 90 days of issuance of this permit;
- ii. the emission testing shall be conducted to demonstrate compliance with the above referenced limit; and,
- iii. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 25 or 25A of 40 CFR Part 60, Appendix A.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Central District Office.

No later than 30 days prior to proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test, and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test(s) and submitted to the Ohio EPA Central District Office with 30 days following completions of test(s).

c. Emission Limitation

43.7 pound VOC/hour

Applicable Compliance Method

See testing requirements above.

d. Emission Limitation

37.28 tons VOC/year as a rolling, 12-month summation.

Applicable Compliance Method

The actual emissions shall be calculated as the product of the VOC emission rate from the last emission test (in pounds of VOC per 1,000 gallons of gasoline loaded) times the gallons of gasoline loaded during the year, divided by 2,000 (See Section D.1 above)

F. Miscellaneous Requirements

1. All records required by this permit to install shall be retained on file for a period of not less than five (5) years unless otherwise indicated by the 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.