

SOUTHWEST REGIONAL OFFICE

MEMO

TO Air Quality Permit File: OP-04-00471
Marathon Petroleum Company LP/ Midland Terminal

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DATE September 3, 2014

RE Comments and Response Document for Title V Operating Permit
Marathon Petroleum Company LP/ Midland Terminal
Midland Borough, Beaver County
APS #713895; AUTH #824481; PF #281962

The Department published a Notice of Intent to Issue a renewed Title V Operating Permit (TVOP) to Marathon Petroleum Company LP for the Midland Terminal in the Pa. Bulletin on May 10, 2014, which initiated a 30-day public comment period. Since the Midland Terminal is a Title V facility, EPA is entitled to a 45-day period of review. Copies of the proposed TVOP and Technical Review Document were sent to EPA Region III on May 6, 2014. The allowable period for EPA to comment ended on June 20. The newspaper notice of the intent to issue the TVOP was published in the Beaver County Times on July 1, 2, and 3. A copy of the proposed Title V Operating Permit was sent to both the Department's inspector for the facility, Scott Beaudway and the permittee. No comments were received from the public or EPA. However during the public comment period, a letter containing comments was received from Marathon Petroleum. Also, the Department made three other changes to the permit since the TVOP was proposed.

Comments from the Marathon Petroleum Company and the Department's response are shown below. Attachment 1 discusses other changes made to the permit made by the Department.

Application has met all of the requirements for issuance of a Title V Operating Permit (TVOP). I recommend issuance of this TVOP with incorporation of the changes discussed, for a 5-year term.

**Marathon Petroleum Company LP
Midland Terminal
TVOP-04-00471
Company Comments regarding the Proposed TVOP and Department Response.**

Comment 1:

On the site inventory page (of the proposed permit) can we list the tanks contents as Petroleum Products with a True Vapor Pressure < 11.1psi? Since the emission projections were calculated utilizing a 15 psi RVP gasoline vapor pressure, this request would not increase emissions over what is currently allowed by the permit. It would also allow flexibility with what products could be stored in each tank.

Response 1:

The Department agrees that this statement of tank contents accurately describes product that may be in the tank. Therefore, this change has been made to the permit. However, the description of the tank contents is not a permit limitation. Information in Section A is not considered to be a permit limitation. Paragraph 2 of Section G-Miscellaneous of the permit stated in that the capacities/throughputs are for informational purposes only and are not enforceable limits. "Other information" has now been added to this statement.

Comment 2:

Section C, Condition #006 (2) - Please note that there are no restrictions on the amount of distillate that can be loaded through the Tank Truck Loading Racks. This condition should be removed.

Response 2:

The Department agrees that this statement is not true and it has been deleted from the permit.

Comment 3:

Section C, Condition #008 - This conflicts with condition #006 and although we understand why it is included it is confusing.

Response 3:

The voluntary maximum emission limit of 6.3 TPY of any individual HAP and all HAPs combined from the terminal was first included in PA-04-00471B. This value was a combination of an existing emission limit of 6.0 TPY of HAPs that was in the Operating Permit and the increase of 0.3 TPY of HAP emissions due to the change authorized by this PA. The older voluntary maximum emission limit of 6.0 TPY of HAPs from the facility was first required by the initial TVOP for the Midland Terminal, issued on November 19, 1999. The value was based on emissions from the facility resulting from Plan Approval PA-04-00471A, issued on September 28, 1998. Emissions from the terminal were determined to be 66 tons of VOC and 5.75 tons of HAPs per year. The PA authorized increased throughput and resulting emissions at the terminal, which changed its status from a synthetic minor facility to being a major source of emissions of VOC, subject to the requirements of Title V. Department records indicate that this requirement was considered necessary to keep the Midland Terminal from being a major source of HAPs and therefore subject to 40 CFR Part 63, Subpart R-National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations). However, elective Condition #008 (old), which restricts emissions to less than or equal to 10 tpy of any single HAP and 25 tpy of the sum of all HAPs combined, is sufficient to require that the Midland Terminal be an area source and not a major source of HAPs.

Therefore, Condition #006 (old), requiring emissions from the Midland Terminal requiring emissions of any single or combined HAPs be less than or equal to 6.3 tpy has been removed from the permit. Since Condition #006 has been removed from the permit, Condition #008 (old) is considered necessary and has not been changed or removed. The comment describing the requirements that ensure that the Midland Terminal is an area source of HAP emissions was moved to Condition #008, Section C (old), Condition #007, Section C (new).

Comment 4:

Section C, Condition #009 - Can we add gasoline or Petroleum Products with a True Vapor Pressure < 11.1 psi.

Response 4:

The Department agrees and this change has been made to the permit.

Comment 5:

Section C, Condition #011 - Since we have not had any visible emissions, fugitive emissions or malodors detected at the facility we are requesting that the monitoring requirement in Condition #011 be changed to weekly instead of daily.

Response 5:

During the past few years, the Department has been consistent in adding a requirement for daily walk around inspections to renewed Operating Permits for facilities that have a potential for fugitive emissions or malodors. The requirement has been placed in the permits of other gasoline terminals, most of which are smaller than the Midland Terminal. To limit its burden, this inspection is only required on days when the station is manned. Therefore, this change has not been made to the permit.

Comment 6:

Section C, Condition # 012 - What specific equipment is being referenced in this requirement?

Response 6:

Condition # 012 of Section C is a general condition regarding recordkeeping. It applies to any process which uses fuel or material such a chemical reagents to perform its function. At the Midland Terminal, this would at least apply to fuel used by the pilot flame of the Alternative Scenario VCU.

Comment 7:

Section C, Condition #018(f) - Any report should be sent to the Pittsburgh Office instead of the Greensburg Office as stated.

Response 7:

The location of where the detailed written report should be sent was changed to the SWRO of PA DEP in Pittsburgh.

Comment 8:

Section C, Condition #026 - We are not sure why this condition is in the Draft since it does not apply to the Midland facility.

Response 8:

Conditions #026 (old) and #027 (old) of Section C are necessary to clarify the opacity limitations in Condition #005. These conditions were kept in the permit.

Comment 9:

Section C, Condition #026 - In addition to the statement above: In Condition #011 it states that visible emissions observations do not have to be conducted by a certified observer while in Condition #026 it states that visible emissions are to be measured by a qualified observer. This needs to be clarified and could read "Other than as allowed on Condition #011 Visible emissions may be measured using either of the following:"

Response 9:

The daily walk around inspection required by Condition #011 of Section C is intended to observe the existence, or lack of, any opacity greater than 0% (Yes/No), where none should exist. An observation of any opacity greater than 0% indicates a problem. This type of observation is allowed by and described in EPA Method 22. By comparison to Method 9, it lowers the economic burden of the walk around inspection. It also demonstrates 0% opacity and therefore, compliance with the opacity limits in Condition #005 of Section C.

Should there be an opacity observation greater than 0%, an observer certified in EPA Method 9 is necessary to demonstrate compliance with the opacity limits. The language of Condition #026 (old) is the specific language of the regulation and need not be modified to allow the (Yes/No) opacity observation. No change was made to this language.

Comment 10:

Section D, Sources 101, 102, 103, 105, 106, 108 - Change to Petroleum Products with a True Vapor Pressure < 11.1psi. As noted previously this will have no impact on emission increases and would allow for the current mix of products at the facility.

Response 10:

The Department agrees and this change has been made to the permit.

Comment 11:

Section D, Source 120, Condition #004 - Remove Ashland from Marathon Ashland in line 4.

Response 11:

The Department agrees and this change has been made to the permit.

Comment 12:

Section D, Source 121, Condition #001 - The 40,000,000 gallon restriction is for gasoline and gasoline like products and not just 40,000,000 gallons.

Response 12:

The Department agrees and this change was made to the permit in both this condition and Condition #009, Section C (old).

Comment 13:

Alternative Operation Requirements Source ID 120 Tank Truck Loading Racks. Condition #001 - Although we understand how the inlet was calculated at 800mg/1 we question the need to have this in the permit. At higher inlet concentration the unit will maintain a 20mg/1 requirement.

Response 13:

This explanation was contained in the condition to show the basis for the requirement. The explanation is also contained in the Technical Review Document and this C&R document. Therefore, the explanation has been removed from this condition in the permit.

Attachment 2
Marathon Petroleum Company LP
Midland Terminal
TVOP-04-00471

Department initiated changes made since posting of the proposed TVOP.

Three changes to the proposed TVOP were made at the initiative of the Department. These changes are:

1. Section C, Condition #006 (old), which limits the annual emission of the all Hazardous Air Pollutants and any single HAP: The time interval used in calculating compliance with this requirement was unclear since it could be interpreted as meaning calendar year. The correct meaning is each consecutive 12-month period, updated monthly. The wording of the condition was changed to make this clear.
2. Section D, Source ID 120, Condition #001, which limits emissions of Total Organic Compounds (TOC) from the Tank Truck Loading Racks which pass through the Vapor Recovery Unit (VRU): The meaning of this condition when it was placed in the initial TVOP for the facility was to limit emission of VOC to 20 mg TOC/ liter of gasoline loaded. However, the wording used incorrectly implied that it also required that the collection efficiency of the VRU be at least 97.5 %. This collection efficiency is physically necessary for the VRU outlet concentration to be in compliance at a specific VRU inlet concentration. The wording of the condition was changed to make this clear.
3. Section F (Alternative Operation Requirements), Source ID 120, Condition #003, which requires periodic testing of the portable, off-site Vapor Combustion Unit: The meaning of the required time interval is not exactly five years, but greater than five years. The wording of the condition was changed to make this clear.

04-00471 Marathon Petroleum Company, LLC, (539 South Main Street Finely, OH, 45480) On September 3, 2014, the Department renewed the Title V Operating Permit for the continued operation of a bulk gasoline transfer terminal, known as the Midland Terminal, located in Midland Borough, Beaver County.

The facility consists of six "swing" storage tanks, with storage capacities between 84,000 and 3,100,000 gallons (1 barrel petroleum = 42 US gallons), one distillate oil, 3,900,000 gallon, fixed roof tank, two ethanol tanks with capacities of 36,000 gallons and 21,000 gallons, equipment for barge loading and unloading, and gasoline and distillate loading racks. The swing tanks are equipped with internal floating roofs. Emissions from the loading racks are controlled by a Vapor Recovery Unit. (VRU) When the VRU is not available, these emissions are controlled by an off-site, portable Vapor Combustion Unit. (VCU) The swing tanks may include any liquid which produces emissions less than or equal to storage of gasoline.

No emission or equipment changes have been approved by this action. The emission restriction, testing, monitoring, recordkeeping, reporting and work practice conditions of the TVOP have been derived from the applicable requirements of 40 CFR Parts 52, 60, and 63 and PA Code Title 25, Article III, Chapters 121 through 145.