

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on September 22, 2020.

Permit Number: **R30-09900022-2020**
Application Received: **August 27, 2020**
Plant Identification Numbers: **099-00022**
Permittee: **MPLX Terminals LLC**
Facility Name: **Kenova-TriState Terminal**
Mailing Address: **539 South Main Street, Findlay, Ohio 45840**

Permit Action Number: *MM01* Revised: *April 5, 2021*

| | |
|--------------------|---|
| Physical Location: | Kenova, Wayne County, West Virginia |
| UTM Coordinates: | 361.323 km Easting • 4251.68 km Northing • Zone 17 |
| Directions: | From Charleston, travel I-64 to the Ceredo/Kenova exit. Take Highway 75 North to Route 60 West. Turn right onto 21st Street, then left on Beech Street. Storage tank farm on left, second black top road to the right and through flood wall is the office and barge loading. |

Facility Description

MPLX Terminal LLC's Kenova-TriState Terminal is a bulk gasoline terminal covered by Standard Industrial Classification (SIC) 5171 and 4491. Previously, this facility was permitted under two Title V permits, one for the Kenova Terminal (099-00100) and one for the TriState Terminal (099-00022). The terminals were treated as a single source for Clean Air Act permitting purposes and in the 2015 renewal, the requirements for the two facilities were combined into one Title V permit.

TriState tank farm receives gasoline and distillate by pipeline, stores it in seven (7) above ground storage tanks, and transfers the product out by pipeline. The tank farm does not have truck, rail, or barge loading or unloading operations. The tank farm also has one (1) wastewater tank, and various insignificant activities.

Kenova marine dock, tank farm and butane truck unloading station consists of four (4) internal floating roof gasoline storage tanks, two (2) fixed cone roof distillate storage tanks, three (3) internal floating roof gasoline/distillate storage tanks, and one (1) Bio-Diesel and/or Petroleum Hydrocarbon Distillates storage tank. A butane truck unloading station and a gasoline butane blending operation. The facility ships petroleum products via barge dock and pipeline export station.

This modification incorporates changes from R13-2277D (issued 12/18/20). R13-2277D quantified and permitted existing dockside emissions, consisting of quality assurance/quality control (QA/QC) sampling and gauging operations, and also included enforceable mitigation procedures to limit emissions from these operations. R13-2277D also included administrative changes requested to address permit limits of Tanks 270-273.

Emissions Summary

This modification results in the following emission changes:

| Pollutant | Change in Potential Emissions (+ or -), TPY |
|-----------------------------|---|
| VOC | -326 |
| Total HAP | -17 |
| n-Hexane (highest ind. HAP) | -5.3 |

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 432.7 TPY of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, MPLX Terminals LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

| | | |
|--------------------|-------------------------|--|
| Federal and State: | 45CSR13 | NSR permits |
| | 45CSR30 | Operating permit requirement. |
| | 45CSR34 | HAP emission standards |
| | 40 CFR 63, Subpart EEEE | Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities |
| State Only: | | None |

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

The active permits/consent orders affected by this modification are as follows:

| Permit or Consent Order Number | Date of Issuance | Permit Determinations or Amendments That Affect the Permit (<i>if any</i>) |
|--------------------------------|-------------------|--|
| R13-2277D | December 18, 2020 | |

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

- ❖ Changes from R13-2277D have been incorporated in the Title V permit. These changes include the following:
 - The Dockside Emissions (QA/QC Testing) were added to the Emission Units Table 1.1 of this permit.
 - Emission limits for the existing permitted storage tanks were reformatted and consolidated in condition 5.1.2 of the permit. Specifically, speciated HAP emission limits were removed.
 - Specific operating requirements were added for the dockside QA/QC testing operations under revised condition 5.1.6 of the permit.
 - The citations were corrected under conditions 5.1.1, 5.1.3, 5.1.4, 5.1.5, and 5.1.9 (renumbered condition 5.1.7) of the permit.
 - Conditions 5.1.7 and 5.1.8 were removed from the permit.
 - Monitoring requirements (5.2.4, 5.2.5, 5.2.6, 5.2.7, and 5.2.8) were added to the permit.
 - Testing requirement 5.3.1 was added to the permit.
 - Recordkeeping requirements (conditions 5.4.2 and 5.4.7) were removed from the permit and the citation for condition 5.4.1 was updated.
 - The citation for condition 5.5.1 was updated.
 - Reporting requirements (conditions 5.5.5, 5.5.6 and 5.5.7) were removed from the permit.

- ❖ Additional changes have been incorporated in the Title V permit that are outside of the R13-2277D changes. These changes include the following:
 - Since the term “Distillate” represents a range of distillation products including but not limited to #2 Fuel Oil (Diesel), Kerosene, and Jet Fuel, the following changes were made in the Emission Unit Table per company’s request:
 - For Tanks 261 and 262, Emission Unit Description was updated from #2 Fuel Oil to Distillate.
 - For the Barge Loading Stations, Emission Unit Description was updated from kerosene, biodiesel and #2 Fuel Oil to Distillate.

 - Since Emission Unit ID- Dockside Emissions was added during this modification, Emission Unit IDs- Barge Arrival/ Departure and Gauging and Sampling were removed from the Emission Unit Table per company’s request.

(Dockside Emissions: As a part of the barge loading operations, the dockside emissions are arrival pre-loading and departure post-loading emissions from opening ullage hatch fittings. Dockside emissions are also fugitive evaporative emissions that can occur during product quality control sampling and gauging of a gasoline or distillate barge)

- **40 CFR 63 Subpart EEEE Requirements**

MACT EEEE applies to major sources of HAPs that operate organic liquid distribution (OLD) (non-gasoline) facilities. Pursuant to 40 CFR §63.2338(c)(1), affected sources (e.g., storage tanks, transfer racks, equipment leak components) that are part of an affected source under another NESHAP are not subject to Subpart EEEE. In addition, the definition of organic liquids excludes gasoline, distillate oils No. 1 and No. 2, and wastewater, and any non-crude liquid that contains less than 5 percent by weight organic HAP (e.g., butane). For these reasons, MACT EEEE does not apply to the gasoline, distillate, butane, and wastewater storage tanks and/or load racks at the Kenova-TriState Terminal.

However, upon the company’s review of the current safety data sheets (SDS) for additives, there is greater than 5% HAP in one distillate additive used at the terminal. Table 2 summarizes the affected sources and applicable MACT EEEE requirements:

MACT EEEE Requirements for Additive Tanks/Unload Racks

| EU | Description | Tank Type | Capacity (gal) | MACT |
|----------|--------------------------------------|-----------|----------------|--------------------|
| Tank 300 | Additive Storage Tank (Unisol BK-50) | VFR | 3,780 | 40 CFR §63.2343(a) |
| N/A | Tank 300 additive unload rack | N/A | N/A | |

Although R13-2277D placed limitations on the dockside emissions which made the facility an area source of HAPs and EPA’s reversal of the “Once In Always In” policy would allow this facility to no longer apply Subpart EEEE, the facility has decided to maintain the major source designation and apply Subpart EEEE to Tank 300. Before this determination, there weren’t any applicable regulations governing this tank. Tank 300 is subject only to recordkeeping requirements; no substantive requirements (e.g., control requirements) apply. For equipment leaks under 40 CFR 63 Subpart EEEE, since no affected source would require controls, no equipment leak requirements apply in accordance with 40 CFR §63.2343(a). Applicable recordkeeping requirement was added in section 10 of this permit and condition 3.7.2(g) was updated.

Non-Applicability Determinations

None

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: N/A
Ending Date: N/A

Point of Contact

All written comments should be addressed to the following individual and office:
Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41283
Beena.j.modi@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Not applicable.