

Fact Sheet



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

Permit Number: **R30-09900022-2020**
Application Received: **September 24, 2019**
Plant Identification Numbers: **099-00022**
Permittee: **MPLX Terminals LLC**
Facility Name: **Kenova-TriState Terminal**
Mailing Address: **539 South Main Street, Findlay, Ohio 45840**

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 #2 fuel oil storage tanks, three (3) internal floating roof gasoline/#2 fuel oil/kerosene 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.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2019 Actual Emissions
Carbon Monoxide (CO)	4.0	<0.1
Nitrogen Oxides (NO _x)	4.2	<0.1
Particulate Matter (PM _{2.5})	0.1	<0.1
Particulate Matter (PM ₁₀)	0.1	<0.1
Total Particulate Matter (TSP)	0.2	<0.1
Sulfur Dioxide (SO ₂)	0.01	<0.01
Volatile Organic Compounds (VOC)	758.7	536.6

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2019 Actual Emissions
Benzene	6.5	4.6
Cumene	0.1	
Ethylbenzene	0.9	0.5
Hexane	12.1	8.2
Naphthalene	0.1	
Toluene	9.8	6.7
Trimethylpentane (2, 2, 4)	6.3	4.1
Xylene	4.3	2.7
Total HAPs	39.9	26.8

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit 758.7 TPY of VOC, 12.1 TPY of Hexane, and 39.9 TPY of Total HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	PM from indirect heat exchangers
	45CSR6	Open burning prohibited
	45CSR11	Standby plans for emergency episodes
	45CSR13	NSR permits
	45CSR16	Standards of Performance for New Stationary Sources pursuant to 40 C.F.R. Part 60
	45CSR§§21-5, 27, 28	Internal/external floating roof storage tank requirements
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting
	45CSR30	Operating permit requirement
	45CSR34	HAP emission standards
	40 C.F.R. Part 60, Subpart Kb	Requirements for volatile organic liquid storage vessels
	40 C.F.R. Part 60, Subpart IIII	CI NSPS
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart R	Gasoline distribution facility requirements
	40 C.F.R. Part 63, Subpart Y	Marine Tank Vessel Loading Operations requirements
	40 C.F.R. Part 63, Subpart ZZZZ	RICE MACT
	40 C.F.R. Part 63, Subpart DDDDD	Boiler MACT
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

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

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-1352A	March 26, 2007	
R13-2277C	June 7, 2011	

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

Equipment Changes

The following Equipment has been removed/installed since the previous permitting action:

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed/Modified	Design Capacity	Control Device
Equipment Removed					
Engine #1 ¹	Engine #1	Emergency Fire Water Pump Engine	1986	400 hp	N/A
Engine #2 ²	Engine #2	Office Emergency Backup Generator	2012	14 hp	N/A
Engine #3 ²	Engine #3	Tank Farm Emergency Backup Generator	2012	14 hp	N/A
Equipment Installed					
Barge Arrival/Departure	Barge Arrival/Departure	Emissions from depressurizing a barge upon arrival at the dock and after loading the vessel.	1948	N/A	N/A
Gauging and Sampling	Gauging and Sampling	Any sampling or gauging activities deemed necessary.	1948	N/A	N/A
Engine #4	Engine #4	Clarke Loaded Fleet Fire Pump Engine	2015	510 hp	N/A
Engine #5	Engine #5	Godwin WW Liftstation Backup Pump	2015	66 hp	N/A

¹Requirements for this engine were included in Section 7.0 of the previous Title V permit. Since this engine is no longer in use at this facility, this section has been removed with this renewal.

²Requirements for these engines were included in Section 8.0 of the previous Title V permit. Since these engines are no longer in use at this facility, this section has been removed with this renewal.

New Permit Sections

Section 7.0: Clarke Loaded Fleet Fire Pump Engine [emission point ID(s): Engine #4]

This section replaces the previous section 7.0. Engine #4 is subject to the following rules:

- 45CSR16: Standards of Performance for New Stationary Sources—This rule applies to all sources subject to 40CFR60.
- 45CSR34: Emission Standards for Hazardous Air Pollutants—this rule applies to most sources covered by 40CFR63.
- 40CFR60, Subpart III: NSPS for Stationary Compression-Ignition Internal Combustion Engines—this engine is a 510 hp emergency fire pump engine manufactured after July 1, 2006. It is subject to emission standards, fuel requirements, monitoring, testing, recordkeeping, and notification requirements from 40CFR60, Subpart III.
- 40CFR63, Subpart ZZZZ: RICE MACT—since this engine is an emergency engine rated over 500 hp at a major source of HAPS, there are some requirements from this rule that apply to Engine #4. These requirements include general provisions from this rule, fuel requirements, and initial notification requirements.

The following table summarizes the requirements applicable to Engine #4:

Title V Permit Condition	Summary of Permit Condition	Regulatory Citation
7.1.1.	Emission Limits	45CSR16; 40CFR§60.4205(c) and Table 4 to 40 CFR 60 Subpart IIII
7.1.2.	Fuel Requirements	45CSR16; 40CFR§60.4207(b)
7.1.3.	Comply with Emission Standards Over Life of Engine	45CSR16; 40CFR§60.4206
7.1.4.	Compliance Requirements	45CSR16; 40CFR§§60.4211(a), (c), (f), (g)
7.1.5.	General Provisions	45CSR34; 40CFR§§63.6605(a) and (b)
7.1.6.	Emergency RICE Requirements	45CSR34; 40CFR§§63.6640(f)(1), (2), and (3)
7.2.1.	Non-resettable Hour Meter	45CSR16; 40CFR§60.4209(a)
7.3.1.	Performance Testing	45CSR16; 40CFR§§60.4212(a), (b), (c), (e)
7.4.1.	Records of Engine Operation	45CSR16; 40CFR§60.4214(b)
7.5.1.	Initial Notification	45CSR34; 40CFR§63.6645(f)
7.5.2.	Annual Reporting Requirements	45CSR16; 40CFR§60.4214(d)

Section 8.0: Godwin WW Lift station Backup Pump [emission point ID(s): Engine #5]

This section replaces the previous section 8.0. Engine #5 is subject to the following rules:

- 45CSR16: Standards of Performance for New Stationary Sources—This rule applies to all sources subject to 40CFR60.
- 45CSR34: Emission Standards for Hazardous Air Pollutants—this rule applies to most sources covered by 40CFR63.
- 40CFR60, Subpart IIII: NSPS for Stationary Compression-Ignition Internal Combustion Engines—this engine is a 66 hp non-emergency engine with a displacement of less than 30 liters per cylinder. It is subject to emission standards, fuel requirements, and testing requirements from 40CFR60, Subpart IIII.
- 40CFR63, Subpart ZZZZ: RICE MACT—as stated in 40CFR§63.6590(c)(7), for a new compression ignition RICE with a site rating of less than 500 hp at a major source of HAPs, compliance with this rule is achieved through compliance with 40CFR60, Subpart IIII.

The following table summarizes the requirements applicable to Engine #5:

Title V Permit Condition	Summary of Permit Condition	Regulatory Citation
8.1.1.	Emission Standards	45CSR16; 40CFR§60.4204(b)
8.1.2.	Fuel Requirements	45CSR16; 40CFR§60.4207(b)
8.1.3.	Comply with Emission Standards Over Life of Engine	45CSR16; 40CFR§60.4206
8.1.4.	Compliance Requirements	45CSR16; 40CFR§§60.4211(a), (c), (g)
8.3.1.	Performance Testing	45CSR16; 40CFR§§60.4212(a), (b), (c), (e)

Section 9.0: Hot Oil Heater #1 [emission point ID(s): Hot Oil Heater #1]

This new section addresses requirements for Hot Oil Heater #1. Hot Oil Heater #1 has a design heat input of 2,499 MMBTU/hr and is subject to the following rules:

- 45CSR2: Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers—the Hot Oil Heater is subject to an opacity limit with provisions to be granted an exception in emergency situations. The Hot Oil Heater is exempt from the other sections of this rule because it has a design heat input of less than 10 MMBTU/hr.
- 45CSR34: Emission Standards for Hazardous Air Pollutants—this rule applies to most sources covered by 40CFR63.
- 40CFR63, Subpart DDDDD: Boiler MACT—Hot Oil Heater #1 is subject to boiler tune-up requirements, a requirement for a one-time energy assessment, recordkeeping requirements, and compliance reporting requirements.

The following table summarizes the requirements applicable to Hot Oil Heater #1:

Title V Permit Condition	Summary of Permit Condition	Regulatory Citation
9.1.1.	10% Opacity Limit	45CSR§2-3.1
9.1.2.	Exceptions to Opacity Limit	45CSR§2-10.1
9.1.3.	Tune-up Every 5 Years	45CSR34; 40CFR§§63.7500(a) and (e) and Table 3, Item 1
9.1.4.	Tune-up Every 5 Years	45CSR34; 40CFR§§63.7540(a)(12) and 63.7515(d)
9.1.5.	Tune-Up Requirements	45CSR34; 40CFR§63.7540(a)(10)
9.1.6.	Initial Compliance and Tune-ups	45CSR34; 40CFR§63.7510(g)
9.2.1.	Method 9 Emissions Observations	45CSR§30-5.1.c
9.3.1.	Method 9 Emissions Observations or COMS	45CSR§2-3.2
9.4.1.	Records of Monitoring	45CSR§30-5.1.c
9.4.2.	Keep Copies of Notifications	45CSR34; 40 CFR§63.7555(a)(1)
9.4.3.	Maintaining Records	45CSR34; 40 CFR§63.7560
9.5.1.	Initial Notification	45CSR34; 40CFR§63.7545(b)
9.5.2.	Notification of compliance Status	45CSR34; 40 CFR§§63.7545(e)(1) & (8)
9.5.3.	Notification of Alternative Fuel Use	45CSR34; 40CFR§63.7545(f)
9.5.4.	Report Submission Deadlines	45CSR34, 40 CFR§§63.7550(b) and (b)(5)
9.5.5.	Compliance Report: Tune-Ups	45CSR34, 40 CFR§§63.7550(c)(1), (c)(5)(i) through (iii), (c)(5)(xiv), and (c)(5)(xvii)

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

- a. 45 CSR 21, Section 22: Not applicable because Kenova and TriState Terminals do not have gasoline tank truck loading facilities.
- b. 45SCR21-27 & 28 - Not applicable to Tanks 202*, 255, 261, 262, and 273 per 45CSR§21-27.1.b.3-4 and 45CSR§21-28.1.b.3.
- c. 40 CFR 60, Subpart XX: Not subject because this facility does not have gasoline tank truck loading facilities.
- d. 40 CFR 60, Subpart Kb: Not applicable to Tanks 202, 255, 261, 262, and 273 per 40 CFR§60.110b(b) due to vapor pressure of stored materials.
- e. 40 CFR 61, Subpart BB: Not subject because the loading of gasoline and petroleum distillates are specifically exempted per 40 C.F.R. § 61.300(a).
- f. 40 CFR 63, Subpart R - Not applicable to Tanks 202*, 255, 261, 262, and 273, since these tanks do not store gasoline.
- g. 40 CFR 63, Subpart EEEE: Not applicable per 40 C.F.R. § 63.2406. The definition of organic liquid excludes gasoline, kerosene, and diesel.
- h. 40 CFR 63, Subpart BBBB: The Kenova-TriState Terminal is subject to 40 CFR 63, Subpart R. 40 CFR 63, Subpart BBBB does not apply to the Kenova-TriState Terminal.

*Note: Tank 202 is considered an insignificant emission source. It was included in this section upon request of the permittee.

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: August 5, 2020
Ending Date: September 4, 2020

Point of Contact

All written comments should be addressed to the following individual and office:

Rex Compston, P.E.
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Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41252 • Fax: 304/926-0478
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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)

No comments were received during the draft/proposed comment period.

However, the following changes were made to the final permit:

- Conditions 7.1.4.c.2.ii and 7.1.4.c.2.iii were deleted.
- Emergency RICE operating requirements for non-emergency situations, as specified in 40CFR§60.4211(f)(3)(i), were added as condition 7.1.4.c.3.i.
- Annual reporting requirements from 40CFR§60.4214(d) were added as condition 7.5.2.