217/782-2113

CONSTRUCTION PERMIT

PERMITTEE

Marathon Ashland Petroleum LLC
Attn: John S. Swearingen
Marathon Avenue
Robinson, Illinois 62454

Application No.: 02090015 I.D. No.: 033808AAB
Applicant's Designation: Date Received: September 6, 2002
Subject: Platformer Turnaround
Date Issued: September 26, 2002
Location: Marathon Avenue, Robinson

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of a Platformer Turnaround Project, that is, various changes to the refinery's Platformer Unit to replace catalyst and modify compressors, as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. This permit authorizes the Permittee to replace the catalyst and make modifications to two compressors in its Platformer Unit. As a result of these changes, several heaters will be debottlenecked and several tanks will realize an increase in utilization.

2a. The firing rate of heaters debottlenecked by this project shall not exceed the following limits:

Heater	Firing Rate (mmBtu/Hr, 12-Month Rolling Average)
16F-1	40.0
16F-2	37.5
16F-3	568.0
16F-4	46.0

b. Only gaseous fuels shall be burned in the affected heaters.

3a. Emissions from the heaters debottlenecked by this project (16F-1, 16F-2, 16F-3, 16F-4) shall not exceed the following limits. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

Pollutant	Emissions (Tons/Month)	(Tons/Year)
SO_2	5.5	33.3
NO_x	27.2	163.0
VOM	2.9	17.1
CO	39.1	234.8
PM/PM_{10}	4.0	23.7

b. This permit is issued based upon potential increases in emissions and operation of several storage tanks attributable to the incremental increase in Platformate throughput (up to 1,520,000 barrels per year) as identified in the table below.

Emission Unit	VOM Emissions (Tons/Year)
Platformate Tanks 1001, 1016	2.1
Premium Gasoline Tanks 905, 1011, 1022, 1023	5.4

4. The source has addressed the applicability and compliance of 40 CFR 52.21, Prevention of Significant Deterioration (PSD) (See Attachment 1). The limits established by this permit are intended to ensure that the modification addressed in this construction permit does not constitute a major modification pursuant to these rules.

5. The Permittee shall maintain records of the following items for the affected heaters:

a. Firing rate of each heater (mscf and mmBtu/hr, on a 12-month rolling average); and

b. NO_x, CO, VOM, SO_2, PM and PM_{10} emissions from the heaters (tons/month and tons/year).

6a. Compliance with the SO_2 limits for the heaters in Condition 3a shall be based on the actual sulfur in the fuel gas.

b. Compliance with the other emission limits in Condition 3a for the heaters shall be based on the operating records required by Condition 5a and appropriate emission factors. Results from representative stack tests in accordance with the methods described in 40 CFR Part 60, Appendix A shall be used in lieu of these emission factors to represent actual emissions.

i. For Heaters 16F-1, 16F-2, and 16F-4:

Pollutant	Emission Factor (Lbs/mscf)
NO_x	0.1
CO	0.084
VOM	0.0055
PM/PM_{10}	0.0076

ii. For Heater 16F-3:

Pollutant	Emission Factor (Lbs/mscf)
NO_x	0.066
CO	0.084
VOM	0.0055
PM/PM_{10}	0.0076

7. Operation of the equipment being constructed and modified is allowed under this permit until final action is taken on the Clean Air Act Permit Program (CAAPP) application for this source. As a result, the Permittee is not required to apply for and obtain a state operating permit in the interim.

Please note that although this permit allows operation of equipment as listed above, the Permittee must update their CAAPP application for this equipment by submitting form 505-CAAPP - "Supplement to CAAPP Application" along with all other appropriate information to accomplish this.

If you have any questions on this permit, please contact Jason Schnepp at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:JMS:jar

cc: Region 3

Attachment 1 - Project Increases

Actual Emissions (8/26/2000 through 8/25/2002)

Heater	SO_2 (Tons/Yr)	NO_x (Tons/Yr)	VOM (Tons/Yr)	CO (Tons/Yr)	PM/PM_{10} (Tons/Yr)
Heater 16F-1	0.1	8.8	0.5	7.4	0.7
Heater 16F-2	0.1	9.2	0.5	7.8	0.7
Heater 16F-3	1.1	103.4	8.6	131.5	11.9
Heater 16F-4	0.1	9.6	0.5	8.1	0.7
TOTAL:	1.3	131.0	10.1	154.8	14.0

Potential Emissions

Heater	SO_2 (Tons/Yr)	NO_x (Tons/Yr)	VOM (Tons/Yr)	CO (Tons/Yr)	PM/PM_{10} (Tons/Yr)	
Heaters 16F-1, 2, 3, 4	33.3		163.0	17.2	234.8	23.7

Emissions Increase

Pollutant	Emission Increases* (Tons/Yr)
SO_2	32.0
NO_x	32.0
VOM	7.1**
CO	80.0
PM/PM_{10}	9.7

* The emission increases are calculated by subtracting the past actual emissions from the future potential emissions.

** The 7.5 tons of VOM from the incremental increase at the storage tanks brings the total VOM increase for this project to 7.1 + 7.5 = 14.6 tons.

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