

217/782-2113

CONSTRUCTION PERMIT -- NSPS SOURCE -- REVISED

PERMITTEE

Marathon Ashland Pipe Line LLC
Attn: Dan Kimmel
539 South Main Street
Findlay, Ohio 45840

Application No.: 01010035

I.D. No.: 023812AAB

Applicant's Designation:

Date Received: April 11, 2001

Subject: Storage Tanks

Date Issued: May 14, 2001

Location: Old Route 40, Martinsville

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of three new petroleum liquid storage tanks (Tank 1279, 1280, 1283) each with an internal floating roof, one new booster pump and geodomes installed on existing tanks 19, 1210, 1234, 1235, 1265, 1266, 1267, and 1272 as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1.0 Unit Specific Conditions

1.1 Unit: Storage Tanks
Control: Internal Floating Roof

1.1.1 Description

The three storage tanks will hold various types of petroleum liquids. Each tank will be equipped with an internal floating roof.

1.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Tank 1279	840,000 gallon petroleum liquid storage tank	Internal Floating Roof
Tank 1280	840,000 gallon petroleum liquid storage tank	Internal Floating Roof
Tank 1283	6,300,000 gallon petroleum liquid storage tank	Internal Floating Roof

1.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected tank" for the purpose of these unit-specific conditions, is each tank as described in Conditions 1.1.1 and 1.1.2.

- b. Each affected tank is subject to 40 CFR 60, Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. Each affected tank is subject to this requirement because they have a design capacity greater than or equal to 151 m³ containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa but less than 76.6 kPa.

1.1.4 Non-Applicability of Regulations of Concern

- a. Each affected tank is not subject to the requirements of 35 IAC 215.123: Petroleum Liquid Storage Tanks, because each affected storage tank is subject to 40 CFR 60, Subpart Kb [35 IAC 215.123(a)(5)].
- b. This permit is issued based on each affected tank not being subject to the National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations), 40 CFR Part 63, Subpart R, because the affected tanks are not located at a source that is a major source of hazardous air pollutants.

1.1.5 Control Requirements and Production limits

- a. Each affected tank shall have a fixed roof in combination with an internal floating roof meeting the following specifications:
 - i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible [40 CFR 60.112b(a)(1)(i)].
 - ii. Each internal floating roof shall be equipped with the following closure device between the

wall of the storage vessel and the edge of the internal floating roof:

A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof [40 CFR 60.112b(a)(1)(i)(C)].

- iii. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface [40 CFR 60.112b(a)(1)(iii)].
- iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use [40 CFR 60.112b(a)(1)(iv)].
- v. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports [40 CFR 60.112b(a)(1)(v)].
- vi. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting [40 CFR 60.112b(a)(1)(vi)].
- vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening [40 CFR 60.112b(a)(1)(vii)].

- viii. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover [40 CFR 60.112b(a)(1)(viii)].
- ix. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover [40 CFR 60.112b(a)(1)(ix)].
- b. Each affected tank shall be equipped with a permanent submerged loading pipe [35 IAC 215.122(b)].

1.1.6 Emission Limitations

- a. Emissions from the affected tanks (tanks 1283, 1279, 1280) and debottlenecked tanks (tanks 19, 1210, 1234, 1235, 1265, 1266, 1267, 1272, 1278) and equipment leaks (new components) shall not exceed the following limits:

VOM Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
11.1	89.1

These limits are based on the compliance procedures specified in Condition 1.1.12. The annual limit represents a 39.90 ton VOM increase. The increase was calculated using the potential emissions from the affected tanks, the potential emissions from new equipment leaks, and an "actual-to-potential" calculation for the debottlenecked tanks (baseline years 1999 and 2000).

- b. 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).
- c. The source has addressed the applicability and compliance of 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this construction permit does not constitute a new major source or major modification pursuant to these rules.

1.1.7 Testing Requirements

None

1.1.8 Inspection and Monitoring Requirements

- a. The Permittee shall fulfill all applicable testing and procedures requirements of 40 CFR 60.113b(a) for each affected tank [40 CFR 60.113b(a)].
- b. The Permittee shall fulfill all applicable monitoring of operations requirements of 40 CFR 60.116b for each affected tank [40 CFR 60.116b].

1.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected tanks to demonstrate compliance with this permit:

- a. The Permittee shall fulfill all applicable recordkeeping requirements of 40 CFR 60.115b for each affected tank [40 CFR 60.115b];
- b. Material stored for each affected tank (tanks 1283, 1279, 1280) and debottlenecked tank (tanks 19, 1210, 1234, 1235, 1265, 1266, 1267, 1272, 1278);
- c. Material throughput for each affected tank (tanks 1283, 1279, 1280) and debottlenecked tank (tanks 19, 1210, 1234, 1235, 1265, 1266, 1267, 1272, 1278) (gallons/month and gallons/year);
- d. VOM Emissions for the affected tanks (tanks 1283, 1279, 1280) and debottlenecked tanks (tanks 19, 1210, 1234, 1235, 1265, 1266, 1267, 1272, 1278) and equipment leaks (new components (tons/month and tons/year)).

1.1.10 Reporting Requirements

The Permittee shall fulfill all applicable reporting requirements specified in 40 CFR 60.115b for each affected tank [40 CFR 60.115b].

1.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected tank without prior notification to the Illinois EPA or revision

of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Changes in the material stored in a tank, provided the material stored has a maximum true vapor pressure less than 76.6 kPa.

1.1.12 Compliance Procedures

- a. Emissions from each affected tank (tanks 1283, 1279, 1280) and debottlenecked tank (tanks 19, 1210, 1234, 1235, 1265, 1266, 1267, 1272, 1278) shall be determined through the use of an approved USEPA methodology, such as the TANKS program.
 - b. Emissions from equipment leaks (new components) shall be based upon actual component counts and emission factors from the U.S. EPA Document, 1995 Protocol for Equipment Leak Emission Estimates (EPA-453/R-95-017), November 1995, Table 2-3.
2. Each affected tank may be operated for a period of 180 days under this construction permit.
 3. This permit is issued based on the addition of geodomes to tanks 19, 1210, 1234, 1235, 1265, 1266, 1267, and 1272, which converts them from external floating roofs to internal floating roofs, being an action that enhances the VOM control measure on the tanks.

Please note that the Permittee should seek to amend their CAAPP permit to include the construction and/or modification covered under this permit through the administrative amendment process by submitting an application that includes the information contained in form 273-CAAPP. This application must also identify and address any changes from the associated construction permit application. Note that information previously submitted in the construction permit application may be incorporated by reference into the application to amend the CAAPP permit. The Permittee must also provide updated information on fees as contained in form 292-CAAPP, "Fee Determination for CAAPP Permit."

It should be noted that this permit has been revised to include construction of geodomes for existing tanks 19, 1210, 1234, 1235, 1265, 1266, 1267, and 1272.

If you have any questions on this, please call Jason Schnepf at 217/782-2113.

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

DES:JMS:psj

cc: Region 3