

Project Summary

I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

The Marathon Ashland Petroleum, LLC – Mt. Prospect Terminal is located at 3231 Busse Road, Arlington Heights. The source is a petroleum bulk terminal for various petroleum products. The terminal receives gasoline and other petroleum products from various refineries by pipeline. These products are stored at the source prior to shipment of the material to different destinations via the pipeline, or distributed to petroleum bulk plants or gasoline dispensing operations located within the surrounding community by tanker truck. A truck loading rack is used for this purpose.

This source consists of seven large internal floating roof tanks, one large external floating roof tank; two fixed roof tanks; one loading rack with bottom loading lanes; and other smaller fixed roof tanks and an oil/water separator (insignificant activities).

Six of the large floating roof tanks store gasoline and/or fuel oil. Two of the internal floating roof tanks store ethanol. Off specification gasoline and fuel oil is stored in one the fixed roof tanks. Fuel oil and fuel additives are stored in the other fixed roof tank.

As the petroleum products are bottom loaded into tanker trucks, the displayed hydrocarbon vapors are vented to a vapor combustion unit.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Emission Control Equipment
Group 1 Storage Tanks (See Attachment 1 for Details)	Fixed Roof Storage Tanks With a Capacity of Less Than or Equal to 40,000 Gallons Storing Various Petroleum Liquids	Permanent Submerged Fill
Group 2 Storage Tanks (See Attachment 1 for Details)	Fixed Roof Storage Tanks With a Capacity Greater Than 40,000 Gallons That Store Organic Material With a Vapor Pressure Less Than	Permanent Submerged Fill

	0.5 psia	
Group 3 Storage Tanks (See Attachment 1 for Details)	Existing Internal Floating Roof Storage Tanks - Not Subject to 40 CFR 60 Subpart K or Kb	Floating Roof With Primary Seal and Permanent Submerged Fill

Emission Unit	Description	Emission Control Equipment
Group 4 Storage Tanks (See Attachment 1 for Details)	Existing External Floating Roof Storage Tanks That Require a Rim Mounted Secondary Seal	Floating Roof With Shoe Mounted Primary Seal and Rim-Mounted Secondary Seal, Permanent Submerged Fill
Group 5 Storage Tanks (See Attachment 1 for Details)	Internal Floating Roof Storage Tanks - Subject to 40 CFR 60 Subpart K	Floating Roof and Permanent Submerged Fill
Group 6 Storage Tanks (See Attachment 1 for Details)	Internal Floating Roof Storage Tanks - Subject to 40 CFR 60 Subpart Kb	Floating Roof With Shoe Mounted Primary Seal and Rim-Mounted Secondary Seal, Permanent Submerged Fill
Tank Truck Loading Rack	Truck Loading Rack	Vapor Combustion Unit and Vapor Recovery
Fugitive Emissions	Piping, Valves, and Pumps Used to Transfer Materials Between the Pipe Line Storage Tanks and Loading/Unloading Rack	None

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

Pollutant	Tons/Year
Volatile Organic Material (VOM)	93.42
Sulfur Dioxide (SO ₂)	---
Particulate Matter (PM)	---
Nitrogen Oxides (NO _x)	5.85
HAP, not included in VOM or PM	---
Total	99.27

This permit is a combined Title I/CAAPP permit that may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal

Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit by T1, T1R, or T1N. The source has requested that the Illinois EPA establish or revise such conditions in a Title I permit, consistent with the information provided in the CAAPP application. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the permit includes conditions to implement the Emissions Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as further described in Section 6.0 of the permit. The permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS, and identifies units not subject to further reductions. The permit also provides that the source must begin to operate under the ERMS following the initial issuance of allotment trading units to the source. This will occur for the 2000 seasonal allotment period (rather than the 1999 season as originally intended by the ERMS) due in part to delays in the initial issuance of CAAPP Permits. These delays, which have occurred nationally, are attributable to a variety of causes including the unforeseen complexity of processing these permits and gaps in national guidance. Even though operation under the ERMS will not officially start until the 2000 seasonal allotment period, detailed recordkeeping and reporting of seasonal emissions was required beginning in 1998, which will document emissions reductions achieved by sources in 1999 in preparation for the ERMS.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.

MED:jar