

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Marathon Ashland Pipeline LLC
Attn: James Owens
South 6th Street
Wood River, Illinois 62095-0261

Application No.: 73021451

I.D. No.: 119115AAF

Applicant's Designation:

Date Received: May 25, 2000

Subject: Bulk Terminal

Date Issued:

Expiration Date:

Location: Foot of 7th Street, Hartford
South 6th Street, Wood River

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of one internal floating roof storage tanks (Tank 627), 2 fixed roof storage tanks (Tanks A-8-3 and WR-3), nine external floating roof Storage tanks (Tanks 1256, 1261, 1262, 1274, 1286, 1287, 1288, 1297, and 1298), one pressurized Storage Tank (WR-1), one Wastewater Storage Tank (1289), and one barge loading rack pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic material (VOM) to less than 100 tons/year, combined hazardous air pollutants (HAPs) to less than 25 tons/year, and single hazardous air pollutant (HAP) to less than 10 tons/year). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
 - b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
 - c. This permit supersedes all operating permits issued for this location.
2. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a

Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.

3. Emissions and operation of Storage Tanks and Barge Loading Rack shall not exceed the following limits:

<u>Process</u>	<u>Throughput</u>		<u>Emission</u>	<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Lb/Gal)</u>	<u>(Lb/Mo)</u>	<u>(Ton/Yr)</u>
Gasoline, Naptha,** Distillate and Ethanol Total Storage	84,000,000	845,500,000		6,740	51.19
Crude Oil Storage**	430,000,000	4,338,378,000		5,400	
Additive Storage** Gasoline Blend# and/or Gasoline Loadout	2,800 1,400,000	29,686 9,345,000	0.0034	65 3,578	0.32 15.89
Naptha Loadout	5,000,000	34,712,000	0.0012	6,000	20.83
Distillate Loadout	6,000,000	42,000,000	0.000012	214	<u>1.26</u>
				Total:	97.99

Gasoline blend consists of 90% gasoline and 10% ethanol.

** Based on standard AP-42 emission factors for breathing and working losses

These limits are based on standard AP-42 emission factors and the information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

4. This permit is issued based on negligible emissions of volatile organic material (VOM) from pressurized storage tank (WR-1). For this purpose, emissions shall not exceed nominal emission rates of 0.01 lb/hour and 0.044 ton/year.
5. Emissions of VOM from fugitive losses (pumps, valves, seals, etc.), and maintenance activities shall not exceed 1.85 ton/yr.
6. Pursuant to 35 Ill. Adm. Code 219.123 (b), the owner or operator of the 1 internal floating roof storage tanks and 9 external floating roof Storage tanks shall not cause or allow the storage of any volatile petroleum liquid in the tank unless:
- a. The tank is equipped with one of the vapor loss control devices specified in 35 Ill. Adm. Code 219.121(b).
 - b. There are no visible holes, tears or other defects in the seal or any seal fabric or material of any floating roof.
 - c. All openings of any floating roof deck, except stub drains, are equipped with covers, lids or seals such that:

- i. The cover, lid or seal is in the closed position at all times except when petroleum liquid is transferred to or from the tank;
 - ii. Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports; and
 - iii. Rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.
 - d. Routine inspections of floating roof seals are conducted through roof hatches once every six months.
 - e. A complete inspection of the cover and seal of any floating roof tank is made whenever the tank is emptied for reasons other than the transfer of petroleum liquid during the normal operation of the tank, or whenever repairs are made as a result of any semiannual inspection or incidence of roof damage or defect.
 - f. A record of the results of each inspection conducted under 35 Ill. Adm. Code 219.123 (b)(4) or 35 Ill. Adm. Code 219.123 (b)(5) is maintained.
7. Pursuant to 35 Ill. Adm. Code 219.124 (a), the owner or operator of the 9 external floating roof storage tanks shall not cause or allow the storage of any volatile petroleum liquid in the tank unless:
- a. The tank has been fitted with a continuous secondary seal extending from the floating roof to the tank wall (rim mounted secondary seal) or any other device which controls volatile organic material emissions with an effectiveness equal to or greater than a rim mounted secondary seal.
 - b. Each seal closure device meets the following requirements:
 - i. The seal is intact and uniformly in place around the circumference of the floating roof between the floating roof and tank wall; and
 - ii. The accumulated area of gaps exceeding 0.32 centimeter (1/8 inch) in width between the secondary seal and the tank wall shall not exceed 21.2 square centimeters per meter of tank diameter (1.0 square inches per foot of tank diameter).
 - c. Emergency roof drains are provided with slotted membrane fabric covers or equivalent covers across at least 90 percent of the area of the opening;
 - d. Openings are equipped with projections into the tank which remain

below the liquid surface at all times;

- e. Inspections are conducted prior to May 1, of each year to insure compliance with 35 Ill. Adm. Code 219.124 (a);
 - f. The secondary seal gap is measured prior to May 1, of each year;
 - g. Records of the types of volatile petroleum liquid stored, the maximum true vapor pressure of the liquid as stored, the results of the inspections and the results of the secondary seal gap measurements are maintained and available to the Agency, upon verbal or written request, at any reasonable time for a minimum of two years after the date on which the record was made.
8. The Permittee shall not loadout any crude oil, gasoline, or gasoline blend through the barge loading terminal from May 1 through September 15, without a demonstration of compliance with 35 Ill. Adm. Code 219.762.
9. Gasoline and gasoline blend means; any commercial quality gasoline and blend stocks for use as fuel in motor vehicle without further processing.
10. A petroleum product shall be considered to be a distillate material if the true vapor pressure is less than 0.01 psia at 70°F.
11. A petroleum product shall be considered to be a Naptha material if the true vapor pressure is between 1.6 and 0.01 psia at 70°F.
12. The Permittee shall inspect for leakage all of the components of the vapor control system which carry volatile organic material vapors according to the following intervals:
- a. Pump seals shall be inspected visually every week.
 - b. All valves and the coupler that connects to the delivery vessel shall be inspected by a portable detection unit between March 1 and April 30 of each year. All leaks shall be promptly repaired and a reinspection made within 3 months on those valves which were leaking.
13. The Permittee shall maintain records of the following:
- a. The throughput of each product through the loading rack (gal/mo and gal/yr);
 - b. The throughput of each product stored and in what storage tank. (gal/mo and gal/yr);

- c. Emissions of VOM and HAP for each product from the truck loading racks as determined through Standard AP-42 emissions factors or other methods approved by the USEPA (lb/mo and ton/yr);
 - d. Total emissions of VOM and HAP for each product from the Storage Tanks as determined through Standard AP-42 emission factors or the most current version of the TANKs software (lb/mo and Ton/yr); and
 - e. Total Emissions of VOM and HAP for the facility (lb/mo and ton/yr).
14. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
15. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
16. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:
- Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276
- and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:
- Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234
17. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: Records required by Conditions 13(a) and (b).

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Please note that this permit has been revised to incorporate the operations previously permitted under I. D. #119115AAJ for the product storage fields.

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

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

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cc: Illinois EPA, FOS Region 3
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from Marathon Ashland Pipeline, LLC Facility, located in Hartford and Wood River, Illinois, operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from this facility. The limits as shown below limit storage and loadout of the various products handled by the facility. The resulting maximum emissions are well below the levels, e.g., volatile organic material (VOM) to less than 100 tons/year, combined hazardous air pollutants (HAPs) to less than 25 tons/year, single hazardous air pollutants (HAP) to less than 10 tons/year at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less product material is handled and control measures are more effective than required in this permit.

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