

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - NSPS SOURCE - REVISED

PERMITTEE

Marathon Pipe Line LLC
Attn: Gary Wilson
539 South Main Street
Findley, Ohio 45840

Application No.: 73021451

I.D. No.: 119115AAJ

Applicant's Designation:

Date Received: May 11, 2009

Subject: Bulk Terminal

Date Issued: July 31, 2009

Expiration Date: August 21, 2011

Location: Wood River Station, Foot of 7th Street, Hartford and 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 Tank (Tank 627),
Two 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 Wastewater Storage Tank (1289),
One Portable Wastewater Storage Tank (Frac Tank),
One Barge Loading Rack controlled by Marine Vapor Combustion Unit/Flare (MVCU), and
One Fixed Roof Pressure Relief Storage Tank (Tank WRD-1)

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 initial 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. Storage Tanks 627, 1256 and 1287 are subject to the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984, 40 CFR 60, Subparts A and Kb. The Illinois EPA is administering this regulation in Illinois on behalf of the United States EPA under a delegation agreement.
 - a. The internal floating roof storage tank 627 shall be installed and operated in accord with the standards of 40 CFR 60.112b(a)(1).
 - b. The external floating roof tanks 1256 and 1287 shall be installed and operated in accord with the standards of 40 CFR 60.112b(a)(2).
 - c. The Permittee shall conduct all required inspections, maintain all required records, and submit all notification and reports in accord with the provisions of 40 CFR 60.113b, 40 CFR 60.115b and 60.116b.
- 4a. This permit is issued based upon the source not being subject to the requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Marine Tank Vessel Tank Loading Operations, 40 CFR 63 Subpart Y.
 - b. Pursuant to 40 CFR 63.560(a)(1), the provisions of 40 CFR 63 Subpart Y pertaining to the Maximum Achievable Control Technology (MACT) standards in 40 CFR 63.562(b) and (d) are applicable to existing and new sources with emissions of 10 or 25 tons, as that term is defined in 40 CFR 63.561, except as specified in 40 CFR 63.560(d), and are applicable to new sources with emissions less than 10 and 25 tons, as that term is defined in 40 CFR 63.561, except as specified in 40 CFR 63.560(d).
 - c. Pursuant 40 CFR 63.561, source(s) with emissions of 10 or 25 tons means major source(s) having aggregate actual HAP emissions from marine tank vessels loading operations at all loading berths as follows:
 - i. Prior to the compliance date, emissions of 9.1 Mg (10 tons) or more of each individual HAP calculated on a 24-month annual average basis after September 19, 1997 or of 22.7 Mg (25 tons) or more of all HAP combined calculated on a 24-month annual average basis after September 19, 1997, as determined by emission estimation in 40 CFR 63.565(1); or
 - ii. After the compliance date, emissions of 9.1 Mg (10 tons) or more of each individual HAP calculated annually after September 20,

1999 or of 22.7 Mg (25 tons) or more of all HAP combined calculated annually after September 20, 1999, as determined by emission estimation in 40 CFR 63.565(l).

- d. Pursuant to 40 CFR 63.560(b)(1) and (b)(2), the provisions of 40 CFR 63 Subpart Y pertaining to Reasonably Available Control Technology (RACT) standards in 40 CFR 63.562(c) and (d) are applicable to sources with throughput of 10 M barrels or 200 M barrels, as that term is defined in 40 CFR 63.561, except as specified in 40 CFR 63.560(d). Sources with throughput less than 10 M barrels and 200 M barrels, as that term is defined in 40 CFR 63.561, are not subject to the emissions standards in 40 CFR 63.562(c) and (d).
- e. Pursuant 40 CFR 63.561, source(s) with throughput of 10 M barrels or 200 M barrels means source(s) having aggregate loading from marine tank vessel loading operations at all loading berths as follows:
 - i. Prior to the compliance date, of 1.6 billion liters (10 M barrels) or more of gasoline on a 24-month annual average basis or of 32 billion liters (200 M barrels) or more of crude oil on a 24-month annual average basis after September 19, 1996; or
 - ii. After the compliance date, of 1.6 billion liters (10 M barrels) or more of gasoline annually or of 32 billion liters (200 M barrels) or more of crude oil annually after September 21, 1998.
- 5a. Pursuant to 35 Ill. Adm. Code 219.122(a), no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere during the loading of any organic material from the aggregate loading pipes of any loading area having through-put of greater than 151 cubic meters per day (40,000 gal/day) into any railroad tank car, tank truck or trailer unless such loading area is equipped with submerged loading pipes or a device that is equally effective in controlling emissions and is approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code 201, and further processed consistent with 35 Ill. Adm. Code 219.108.
- b. Pursuant to 35 Ill. Adm. Code 219.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 liters (250 gallons), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code 201, and further processed consistent with 35 Ill. Adm. Code 219.108, or unless such tank is a pressure tank as described in 35 Ill. Adm. Code 219.121(a) or is fitted with a recovery system as described in 35 Ill. Adm. Code 219.121(b)(2).
- 6a. Pursuant to 35 Ill. Adm. Code 219.762(a), except as provided at 35 Ill. Adm. Code 219.762 (c), every owner or operator of a subject marine terminal subject to the requirements of 35 Ill. Adm. Code 219 Subpart GG shall equip each terminal with a vapor collection and control system that:

- i. Captures the vapors displaced during the loading event and reduces overall VOM emissions by at least 95% by weight through the use of either a vapor combustion system or a vapor recovery system;
 - ii. Is maintained and operated so that it prevents visible liquid leaks, significant odors, and visible fumes in the liquid transfer and the vapor collection lines, and appurtenances during loading; and
 - iii. Has been certified as required by Coast Guard regulations found at 33 CFR 154.
- b. Pursuant to 35 Ill. Adm. Code 219.762(b), from May 1 to September 15, the regulatory control period, every owner or operator of a marine terminal subject to the requirements of this 35 Ill. Adm. Code 219 Subpart GG shall load gasoline or crude oil only into marine vessels that are:
- i. Equipped with vapor collection equipment that has been certified as required by Coast Guard regulations found at 46 CFR 39;
 - ii. Connected to the vapor collection system; and
 - iii. Vapor-tight as described in the following 35 Ill. Adm. Code 219.762(b)(3)(A), (b)(3)(B), (b)(3)(C), or (b)(3)(D):
 - A. The owner or operator of the marine terminal shall load each marine vessel with a vacuum assisted vapor collection system, instrumented in such a way that the pump(s) transferring gasoline or crude oil to the marine vessel will not operate unless the vapor collection system is properly connected and properly operating.
 - B. As an alternative to 35 Ill. Adm. Code 219.762(b)(3)(A), the owner or operator of the marine terminal shall obtain documentation as described in 35 Ill. Adm. Code 219.770(b) that the marine vessel has been vapor-tightness tested within either the preceding 12 months or the preceding 14 months, if the test is being conducted as part of the Coast Guard's reinspection of the vessel required under 46 CFR 31.10-17, using Method 21 of Part 60, Appendix A, as described in 35 Ill. Adm. Code 219.768(b).
 - C. If there is no documentation of a successful leak test conducted on the marine vessel in either the preceding 12 months or in the preceding 14 months, if the test is being conducted as part of the Coast Guard's reinspection of the vessel required under 46 CFR 31.10-17, the owner or operator of the marine terminal shall require that a leak test of the marine vessel be conducted during the final 20

percent of loading of the marine vessel or shall not load the vessel. The test shall be conducted when the marine vessel is being loaded at the maximum liquid transfer rate for that transfer operation. The owner or operator of the marine terminal shall require that the documentation described in 35 Ill. Adm. Code 219.770(b) is completed prior to departure of the vessel.

- D. If the marine vessel has failed its most recent vapor-tightness leak test at the marine terminal, before the marine vessel can be loaded, the owner or operator of the marine terminal shall require that the owner or operator of the marine vessel provide documentation that the leaks detected during the previous vapor-tightness leak test have been repaired and that the marine vessel has been vapor-tightness tested since the leak(s) has been repaired pursuant to 35 Ill. Adm. Code 219.762(b)(3)(B).
7. This permit limits the throughput of raw material and air emissions such that volatile organic material (VOM) and hazardous air pollutants (HAPs) are below major source levels, and therefore, the source is exempted by 40 CFR 63.420(b)(2) from 40 CFR 63, Subpart R, National Emission Standard for Gasoline Distribution Facility (Bulk Gasoline Terminals and Pipeline Breakout Stations). To limit potential fugitive emissions, the Permittee shall implement a leak control program.
- 8a. Pursuant to 35 Ill. Adm. Code 219.123 (b), the owner or operator of the internal floating roof storage tanks and external floating roof Storage tanks shall not cause or allow the storage of any volatile petroleum liquid in the tank unless:
- i. The tank is equipped with one of the vapor loss control devices specified in 35 Ill. Adm. Code 219.121(b).
 - ii. There are no visible holes, tears or other defects in the seal or any seal fabric or material of any floating roof.
 - iii. All openings of any floating roof deck, except stub drains, are equipped with covers, lids or seals such that:
 - A. The cover, lid or seal is in the closed position at all times except when petroleum liquid is transferred to or from the tank;
 - B. Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports; and
 - C. 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.

- iv. Routine inspections of floating roof seals are conducted through roof hatches once every six months.
 - v. 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.
 - vi. 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.
- b. Pursuant to 35 Ill. Adm. Code 219.124 (a), the owner or operator of the external floating roof storage tanks shall not cause or allow the storage of any volatile petroleum liquid in the tank unless:
- i. 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;
 - ii. Each seal closure device meets the following requirements:
 - A. The seal is intact and uniformly in place around the circumference of the floating roof between the floating roof and tank wall; and
 - B. 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).
 - iii. Emergency roof drains are provided with slotted membrane fabric covers or equivalent covers across at least 90 percent of the area of the opening;
 - iv. Openings are equipped with projections into the tank which remain below the liquid surface at all times;
 - v. Inspections are conducted prior to May 1, of each year to insure compliance with 35 Ill. Adm. Code 219.124(a);
 - vi. The secondary seal gap is measured prior to May 1, of each year; and
 - vii. 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.

- c. 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.
- 9a. Emissions and operation of all storage tanks (including the new tank WRD-1) shall not exceed the following limits:

<u>Process</u>	Throughput	
	<u>(Gallons/Month)</u>	<u>(Gallons/Year)</u>
Gasoline, Naphtha, Distillate and Ethanol Total Storage*	84,000,000	845,500,000
Crude Oil Storage*	430,000,000	4,338,378,000
Additive Storage*	2,800	29,686

VOM Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
10.0	59.97**

* Based on standard AP-42 emission factors for breathing losses, working losses, and floating roof landing losses.

** Combined emissions from Product, Additive and Crude Oil Storage

These limits are based on standard AP-42 emission factors and the information provided in the permit application.

- b. Emissions and operation of the Barge Loading Rack controlled by the MVCU/Flare shall not exceed the following limits:

<u>Process</u>	VOM Emission Factor
	<u>(Lbs/Gallon)</u>
Gasoline Blend [#] and/or Gasoline Loadout	0.0034
Naphtha Loadout	0.0012
Distillate Loadout	0.000012
Crude Oil Loadout	0.0010

VOM Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
6.33	37.98

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

Each month the barge loading emissions (tons/month and tons/year) shall be calculated by totaling VOM emissions for the different types of

materials loaded in that month and applying the MVCU/Flare control efficiency. The Permittee shall use the following equation to calculate VOM emissions.

$$\text{Total VOM Emissions} = \{(\text{Gallons gasoline loadout} \times 0.0034 \text{ lbs VOM/gallon}) + (\text{Gallons naphtha loadout} \times 0.0012 \text{ lbs VOM/gallon}) + (\text{Gallons distillate loadout} \times 0.000012 \text{ lbs VOM/gallon}) + (\text{Gallons crude oil loadout} \times 0.0010 \text{ lbs VOM/gallon})\} \times (1 - \text{Control Efficiency for MVCU/Flare} / 100)$$

For each day the VOM emissions from the barge loading rack operation are controlled using the MVCU/Flare, the Permittee shall use the control efficiency of 95% (or a more representative level as determined in the latest stack test) in the above equation. For any day that the barge loading rack is operated without the use of the MVCU/Flare, the Permittee shall use the control efficiency of 0%.

These limits are based on standard AP-42 emission factors (Section 5.2) and the information provided in the permit application.

- c. The emissions of combustion related pollutants from the MVCU/Flare shall not exceed the following:

<u>Pollutant</u>	<u>MVCU/Flare Emission Factor (Lbs/Gallon Loaded)</u>	<u>Emissions</u>	
		<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
NO _x	3.34E-05	4.6	23.0
CO	8.35E-05	11.4	57.0

These limits are based on the MVCU/Flare manufacturer's stated emission factors, 32.4 million barrel throughput of the Dock Barge Loading Rack, and the information provided in the permit application.

- d. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall not exceed 0.79 tons/month and 7.9 tons/year of any single HAP and 1.99 tons/month and 19.9 tons/year of any combination of such HAPs.
- e.
 - i. Gasoline and gasoline blend means; any commercial quality gasoline and blend stocks for use as fuel in motor vehicle without further processing.
 - ii. 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.
 - iii. A petroleum product shall be considered to be a Naphtha material if the true vapor pressure is between 1.6 and 0.01 psia at 70°F.

10. Compliance with the annual limits of this permit 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).
11. Emissions of VOM from fugitive losses (pumps, valves, seals, etc.), and maintenance activities shall not exceed 1.86 tons/year.
12. Pursuant to 35 Ill. Adm. Code 219.766, the owner or operator of a marine terminal shall comply with the requirements of 35 Ill. Adm. Code 219.445 with respect to all equipment associated with the vapor collection and control system required by 35 Ill. Adm. Code 219.762(a).
- 13a. Pursuant to 35 Ill. Adm. Code 219.768(a), compliance with 35 Ill. Adm. Code 219.762(a)(2) shall be determined by visual inspection and by the leak detection methods contained in 35 Ill. Adm. Code 219.105(g).
 - b. Pursuant to 35 Ill. Adm. Code 219.768(b), if the control device used to comply with 35 Ill. Adm. Code 219.762(a)(1) is a flare, compliance shall be determined by methods described in 35 Ill. Adm. Code 219.429(c).
 - c. Pursuant to 35 Ill. Adm. Code 219.768(d), Compliance with Section 219.762(b)(3) of this Subpart shall be determined by one of the methods described in this Section:
 - i. A marine vessel loaded in accordance with 35 Ill. Adm. Code 219.762(b)(3)(A) through the use of a vacuum assisted vapor collection system is assumed to be vapor-tight for the purposes of 35 Ill. Adm. Code 219 Subpart GG.
 - ii. A vapor-tightness test for marine vessels shall be conducted to include the final 20 percent of loading of each product tank of the marine vessel, and it shall be applied to any potential sources of vapor leaks on the vessel pursuant to Method 21 of 40 CFR 60, Appendix A. A reading of 10,000 ppmv or greater as methane shall constitute a leak.
 - iii. As an alternative to 35 Ill. Adm. Code 219.768(d)(2), an owner or operator of a marine terminal may use the vapor-tightness test described in 40 CFR 61.304(f).
 - d. Pursuant to 35 Ill. Adm. Code 219.768(e), when in the opinion of the Illinois EPA or USEPA it is necessary to conduct testing to demonstrate compliance with or verify effectiveness of the vapor collection and control system required by 35 Ill. Adm. Code 219.762(a), (c)(1), or (c)(3), the owner or operator of a marine terminal shall, at its own expense, conduct such tests in accordance with the applicable test methods and procedures specified in 35 Ill. Adm. Code 219.768(a), (b), or (c), as applicable.
- 14a. Pursuant to 40 CFR 63.560(a)(3), The recordkeeping requirements of 40 CFR 63.567(j)(4) and the emission estimation requirements of 40 CFR

63.565(1) apply to existing sources with emissions less than 10 and 25 tons.

- b. Pursuant to 40 CFR 63.565(1), for sources with emissions less than 10 or 25 tons and sources with emissions of 10 or 25 tons, the owner or operator shall calculate an annual estimate of HAP emissions, excluding commodities exempted by 40 CFR 63.560(d), from marine tank vessel loading operations. Emission estimates and emission factors shall be based on test data, or if test data is not available, shall be based on measurement or estimating techniques generally accepted in industry practice for operating conditions at the source.
 - c. Pursuant to 40 CFR 63.567(j)(4), owners or operators of marine tank vessel loading operations specified in 40 CFR 63.560(a)(3) shall retain records of the emissions estimates determined in 40 CFR 63.565(1) and records of their actual throughputs by commodity, for 5 years.
- 15a. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
- b. Pursuant to 35 Ill. Adm. Code 219.770(a), the owner or operator of sources complying with 35 Ill. Adm. Code 219.762(a) and (b), or (c)(1), or (c)(3) shall maintain records regarding the marine terminal, and each time a marine vessel is loaded during the regulatory control period. The records shall include but are not limited to:

- i. The date(s) and the time(s) at which the marine vessel was loaded from the marine terminal;
 - ii. The name, type, identification number, and owner of the vessel loaded;
 - iii. The type and amount of liquid loaded into the marine vessel;
 - iv. Records of any leaks found, repair attempts, and the results of the required fugitive monitoring and maintenance program, including appropriate dates, test methods, instrument readings, repair results, and corrective action taken as required by 35 Ill. Adm. Code 219.762(a)(2) and 219.766;
 - v. A copy of the Coast Guard certification demonstrating that the marine terminal's vapor collection and control system has been certified as required by Coast Guard regulations found at 33 CFR 154; and
 - vi. A copy of the Coast Guard certification demonstrating that the marine vessel has been inspected and certified as required by Coast Guard regulations found at 46 CFR 39. If a copy of the Coast Guard certificate is not available at the time of loading, then the date that the marine vessel was last inspected and the authorization that the marine vessel has functioning vapor control equipment must be recorded from the certificate. Further, a copy of the certificate must be obtained by the owner or operator of the marine terminal within 21 days after the loading event.
- c. Pursuant to 35 Ill. Adm. Code 219.770(b), owners or operators complying with 35 Ill. Adm. Code 219.762(b)(3)(B), (b)(3)(C), or (b)(3)(D) shall additionally maintain the following records concerning the vapor-tightness of the marine vessel:
- i. Test title;
 - ii. Owner of the marine vessel tested;
 - iii. The identification number of the marine vessel tested;
 - iv. Testing location;
 - v. Tester name and signature;
 - vi. Witnessing inspector, name, signature, and affiliation; and
 - vii. Test results.
- d. Pursuant to 35 Ill. Adm. Code 219.770(d), owners or operators certifying compliance under 35 Ill. Adm. Code 219.764(c) shall maintain

- the records specified in 35 Ill. Adm. Code 219.770(a)(1), (a)(2), and (a)(3).
- e. Pursuant to 35 Ill. Adm. Code 219.770(e), all records required by 35 Ill. Adm. Code 219.770(a), (b), (c), and (d) shall be maintained for at least three years and shall be made available to the Illinois EPA upon request.
 - f. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
 - i. The throughput of each product through the loading rack on a daily basis (gallons) and the operating/not-operating status of the MVCU/Flare during the loading operations for control of VOM emissions;
 - ii. The throughput of each product stored for each storage tank (gallons/month and gallons/year);
 - iii. Monthly and annual emissions of VOM, NO_x, CO and HAP for each product from the loading rack controlled by the MVCU/Flare with supporting calculations as determined through Standard AP-42 emissions factors or other methods approved by the USEPA (tons/month and tons/year);
 - iv. Total monthly and annual emissions of VOM and HAP for each product from the Storage Tanks with supporting calculations as determined through Standard AP-42 emission factors or the most current version of the TANKs software (tons/month and tons/year); and
 - v. Total monthly and annual emissions of VOM, NO_x, CO and HAP for the source with supporting calculations (tons/month and tons/year).
16. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. A location other than the source is acceptable provided that the records are immediately retrievable and available 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.
17. In the event of a malfunction or breakdown of a floating roof, primary seal, or secondary seal of an affected tank, the Permittee is authorized to continue operation of the tank in violation of the applicable requirement of 35 IAC 219.121, 219.123, and/or 219.124, as necessary to prevent risk of injury to personnel or severe damage to equipment. This authorization is subject to the following requirements:

- a. The Permittee shall repair the damaged feature(s) of the storage tank or empty and remove the tank from VPL service as soon as practicable. This shall be accomplished within 45 days unless the feature(s) cannot be repaired within 45 days and the storage tank cannot be emptied and removed from service within 45 days, and the Permittee obtains an extension for up to 30 days, from the IEPA. The request for such an extension must document that alternative storage capacity is unavailable and specify a schedule of actions the Permittee will take that will assure the feature(s) will be repaired or the storage tank emptied as soon as possible.
 - b. The Permittee shall keep records of the date and duration of the malfunction or breakdown, a detailed explanation of the malfunction/breakdown, an explanation of why the damaged features could not be immediately repaired or the tank emptied and removed from service without risk of injury to personnel or severe damage to equipment, the measures used to reduce the quantity of emissions during the breakdown, steps taken to prevent future breakdowns or reduce their severity, and the amount of release above typical emissions during malfunction/breakdown.
- 18a. If there is an exceedance of or deviation from 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/deviation. 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 deviation and efforts to reduce emissions and future occurrences.
- b. Pursuant to 35 Ill. Adm. Code 219.764(a), upon initial startup or upon change in method of compliance, the owner or operator of a source subject to the requirements of 35 Ill. Adm. Code 219 Subpart GG must certify compliance with the requirements of this Subpart by submitting to the Illinois EPA the following if complying with 35 Ill. Adm. Code 219.762(a) and (b), or (c)(1), or (c)(3):
 - i. The type of vapor collection and control system utilized;
 - ii. The date the system was installed;
 - iii. A demonstration that the vapor collection and control system achieves an overall efficiency of 95%;
 - iv. A copy of the U. S. Coast Guard certification required under 33 CFR 154; and
 - v. The location (including the contact person's name, address, and telephone number) of the records required by 35 Ill. Adm. Code 219.770.

- c. Pursuant to 35 Ill. Adm. Code 219.768(f), an owner or operator of a marine terminal planning to conduct a VOM emissions test to demonstrate compliance with 35 Ill. Adm. Code 219.762(a), (c)(1), or (c)(3) shall notify the Illinois EPA of that intent not less than 30 days before the planned initiation of the tests so that the Illinois EPA may observe the test.
 - d. The Permittee shall notify the Illinois EPA of any change in the type of materials stored that are different from those identified in the original construction permit application.
19. Two (2) copies of required reports and notifications 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

It should be noted that this permit has been revised so as to clarify that the Barge Dock Loading Rack Marine Vapor Combustion Unit (MVCU) is being regulated as a flare under this permit.

If you have any questions on this permit, please call Bruce Beazly at 217/782-2113.

Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

ECB:BDB:psj

cc: Illinois EPA, FOS Region 3
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from this source (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 permit limits the storage and loadout of the various products handled by the facility. The resulting maximum emissions are below the levels, (i.e., volatile organic material (VOM) to less than 100 tons/year, combined hazardous air pollutants (HAPs) to less than 25 tons/year, single hazardous air pollutant (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.

<u>Emission Unit/Activity</u>	EMISSIONS (Tons/Year)				
	<u>CO</u>	<u>NO_x</u>	<u>VOM</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
Storage Tanks			59.970		
Barge Loading Rack			37.980		
Marine Vapor Combustion Unit/Flare	57.0	23.0			
Fugitive Losses and Maintenance Activities	-----	-----	1.850		
Total	<u>57.0</u>	<u>23.0</u>	<u>99.800</u>	<u>7.9</u>	<u>19.9</u>

BDB:psj