DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: On-site Inspection

M409764481

FACILITY: Marathon Pipe Line LLC (St	tockbridge)	SRN / ID: M4097							
LOCATION: 2499 GRIMES RD, STOC	DISTRICT: Lansing								
CITY: STOCKBRIDGE	,								
CONTACT: Kevin Swartzell, Sr HES P	rofessional	ACTIVITY DATE: 09/09/2022							
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR							
SUBJECT: Onsite, announced inspecti	d the NSPS Subpart Kb.								
RESOLVED COMPLAINTS:									

Inspected by: Michelle Luplow

Marathon Personnel Present: Kevin Swartzell, Air Program Coordinator

(kmswartzell@marathonpetroleum.com)

Pete Thomas, Regional Environmental Professional

Remediation System Personnel Present:

Clint Campbell, Site Operator, Antea Group USA

Purpose

Conduct an announced, onsite inspection by determining compliance with Marathon Pipeline's Permit to Install No. 58-00, as well as the NSPS 40 CFR Part 60, Subpart Kb.

Facility Background/Regulatory Overview

Marathon owns and operates a gasoline tank, Tank #681, and distribution piping associated with the tank. The tank itself is located on property owned by Wolverine Pipeline, which is adjacent to Enbridge Pipeline property, located immediately to the south. See attached for aerial of the tank location.

Tank #681 is subject to the NSPS Subpart Kb for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984.

In 2011, gasoline was discovered in the nearby Bauer Drain (a county drain that ran north and south, a few hundred feet east of Tank #681). A small leak had been found in Tank #681's valve seal, which, over a period resulted in upwards of 500,000 gallons spilled. The leak permeated through the soils until it reached a sand formation below ground that allowed the gasoline to travel to the Bauer Drain. A remediation system for the clean up was issued under PTI No. 118-11, which was then voided in 2015 because AQD believed the system could operated under exemption Rule 285(2)(w). The system has been operated under this exemption since that time.

The Bauer Drain was redirected just south of the Enbridge Pipeline property, and cutting to the west, and then to the north to avoid any further impacts from the Marathon tank leak. Marathon now owns the property where the Bauer Drain used to be and is currently working to demonstrate a risk-based shutdown of the remediation system is appropriate.

This facility was last inspected in June 2015.

Inspection

This inspection was announced. AQD worked with Marathon staff out of Findlay, OH to meet at the location of the tank. The property is fenced in and requires access via a padlock. It's recommended that future inspections of the site be conducted by sending prior notice to Marathon to ensure staff are present to open the gate.

At 9:30 a.m. on September 9, 2022 I met with Kevin Swartzell and Pete Thomas from Marathon's Finley, OH office. P. Thomas unlocked the gate to allow us into the site and drive to the tank.

Table 1 lists emission units onsite with respect to Marathon operations.

Table 1. Emission Units

Emission Unit	PTI/Exemption	Control
Tank 681	PTI 58-00	Internal floating roof
188,000 barrel (~27, 822 m³ or ~7,350,000 gallons) internal floating roof tank for 84-octane gasoline storage		
Air Stripping Remediation	Rule 285(2)(w)	Falco 300 Catalytic oxidizer
To remove liquid non-aqueous phase liquid (LNAPL) – unleaded gasoline		

PTI No. 58-00: Tank #681

Emission Limits, Material Limits, & Monitoring/Recordkeeping

VOC emissions are limited to 8.0 tons per 12-month rolling period and gasoline throughput is limited to 710,640,000 gallons per year. Records are required to be kept for both. Marathon provided January 2020 – July 2022 records for both VOC emissions and gasoline throughput, as requested (see attached). All 12-month rolling totals throughout this period indicate emissions at ~6.3 tons VOC, within the limits defined in the permit.

Calendar year 2020 and 2021 gasoline throughputs were reported at 235,666,790 gallons and 259,353,907 gallons, respectively. January – July 2022 total throughput is currently at 152,681, 886 gallons of gasoline. Currently all 3 calendar years appear to be in compliance with the gasoline throughput limit.

40 CFR Part 60, Subpart Kb (NSPS Kb)

Marathon is required to comply with the NSPS Subpart Kb. Tank #681 has a capacity greater than 151 m³ and the maximum true vapor pressure of the gasoline stored in the tank is equal to or greater than 5.2 kPa (0.75 psi) but less than 76.6 kPa (11 psi). True vapor pressure (TVP) is a function of the Reid Vapor Pressure (RVP) and surface temperature of the tank. There are AP-42 calculations that calculate TVP from RVP based on region-specific monthly average surface temperatures. The AP-42 calculation methodology recently changed due to an increase in the monthly average temperature over the past 20 years. The TVP for Tank #681 from 2020 and 2021 based on the new AP-42 calculation methodology, ranged from 3.6 to 6.1 psi. K. Swartzell said that TVP values are higher during the summer months than during the winter months.

Because Tank #681 has a capacity greater than 151 m3 and the gasoline stored in the tank has a TVP between 0.75 psi and 11 psi, the requirements under 60.112b(a) apply. The tank is equipped with an internal floating roof inside storage vessels that have fixed roofs. These types of tanks are required to meet one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof (60.112b(a)(1)(ii)):

- Foam or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal)
- 2 seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof
- A mechanical shoe seal (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)
- P. Thomas and K. Swartzell confirmed that the tank is equipped with a primary mechanical shoe seal.

Inspections for internal floating roof tanks with mechanical shoe primary seals are required per the following (60.113b(a)) and records for each are required under 60.115b(a)(1)-(4):

- Visually inspect the floating roof and primary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill.
 - Checks should be done to ensure that the internal floating roof is resting on the surface of the liquid and that there is not liquid accumulated on the roof, and that the seal is not detached.
 - · If there are issues with the seal or roof, they are to be repaired or the tanks emptied within 45 days.

(60.113b(a)(2))

K. Swartzell said that rather than annual (12-month) visual inspections of the internal floating roof and primary seal through manholes or roof hatches, Marathon conducts these inspections semi-annually. He provided me with all semi-annual inspection records for calendar years 2021 and 2022. Records indicate that the inspections took place 3/12/21, 9/17/21 and 3/11/22 and each includes a record of all items inspected. These inspections meet the requirements of 60.113b(a)(2). Records indicate no issues were found that needed to be fixed (see attached).

- Visually inspect the internal floating roof, the primary seal, gaskets, slotted membranes each time the storage
 vessel is <u>emptied and degassed (i.e. out of service)</u>. If there are defects in the floating roof, holes, tears or
 openings in the seal, the gaskets no longer close off the liquid surfaces from the atmosphere, these items should
 be repaired before refilling the storage vessel.
 - These inspections should not occur at intervals greater than 10 years (60.113b(a)(4))

There is a caveat to this requirement. In January 2021, EPA revised the NSPS Subpart Kb to include options for complying with the 10-year tank inspections. Facilities are allowed, under the revised NSPS Subpart Kb, to conduct in-service 10-year tank inspections if they opt to comply with the NESHAP Subpart WW in lieu of portions of the NSPS Subpart Kb. Facilities are also allowed under the NSPS Subpart Kb to opt-in and opt-out of the NESHAP Subpart WW, so long as they provide notification to the AQD that they are switching from the NSPS Subpart Kb to the NESHAP Subpart WW and vice versa.

Marathon has chosen to comply with the NESHAP Subpart WW in lieu of the NSPS Subpart Kb in order to conduct the 10-year tank inspections while the tank is in-service. Notification for the 10-year tank inspection was received by AQD on May 2, 2022 and includes the caveat that Marathon will opt back in to complying with the NSPS Subpart Kb following the tank inspection, but that for the purposes of the tank inspection, they will be complying with the NESHAP Subpart WW.

The tank was inspected June 23, 2022. K. Swartzell provided the tank inspection record for this 10-year inservice tank inspection (attached).

K. Swartzell said the tank was last emptied/degassed (taken out of service) in 2012 during which time an out-of-service tank inspection was conducted on 7/5/2012.

Exemption Rule 285(2)(w) - Air Stripping Remediation

S. Ericksen Project Engineer for Waste & Remediation at Marathon, said that as of September 1, 2022, the total volume of LNAPL recovered from the site is 286,000 gallons. A catalytic oxidizer is used to control the emissions from the air stripper.

Rule 285(2)(w) applies to air strippers controlled by an appropriately designed and operated incineration system that is used exclusively for the cleanup of gasoline, fuel oil, natural gas condensate, and cruce oil spills, provided that the catalytic oxidizer is operated at a minimum temperature of 600F (315C) at the inlet of the catalyst bed, which includes utilizing a temperature indication device that continually displays the operating temperature.

Clint Campbell, site operator from Antea, showed me around the remediation site. The inlet temperature to the catalyst bed was reading at 332 C, which meets the inlet temperature requirements of the exemption.

Compliance statement: Marathon Pipeline LLC appears to be in compliance with PTI 58-00 and the NSPS Subpart Kb at this time.



Image 1(Location): Tank #681 location



Image 2(Remediation): Monitor used for temperature on the catalytic oxidizer

NAME Michelle Luplow

DATE 9/28/22 SUPERVISOR

RB

Maintenance Item Text	Functional Location Desc Date	Completed Performed by	Holes, tears/other defects in the seal	Seal intact and uniformly in place	Roof floating on the liquid?	Holes or other defects in the roof?	Roof free of accumulated liquid?	Openings equipped with closed covers
PL Semi-Annual Tank Intrnl Float Roof	Stockbridge Tank 681	3/12/2021 MEJAWORSKI	No	Yes	Yes	No	Yes	Yes
PL Semi-Annual Tank Intrnl Float Roof	Stockbridge Tank 681	9/17/2021 S968	No	Yes	Yes	No	Yes	Yes
PL Semi-Annual Tank Intrnl Float Roof	Stockbridge Tank 681	3/11/2022 S968	No	Yes	Yes	No	Yes	Yes

Rolling 12 Month Emissions & Throughput Summary

08/01/2021 to 07/31/2022

Tank VOCs & Throug	Tank VOCs & Throughput - by Tank Type														
		Total	2021 / 08	2021 / 09	2021 / 10	2021 / 11	2021 / 12	2022 / 01	2022 / 02	2022 / 03	2022 / 04	2022 / 05	2022 / 06	2022 / 07	
Internal Floater - Cone/Flat Roof	VOC Lbs	12,646.68	1,350.93	1,080.73	1,353.65	1,111.35	858.27	746.74	713.90	926.46	764.14	1,034.98	1,257.33	1,448.20	
	US Tons	6.32	0.68	0.54	0.68	0.56	0.43	0.37	0.36	0.46	0.38	0.52	0.63	0.72	
	Gallons.	273,598,332	20,932,632	26,340,552	25,206,804	23,132,382	25,304,076	18,257,820	15,484,098	19,580,442	21,378,924	23,697,660	24,680,838	29,602,104	
Total	VOC Lbs	12,646.68	1,350.93	1,080.73	1,353.65	1,111.35	858.27	746.74	713.90	926.46	764.14	1,034.98	1,257.33	1,448.20	
	VOC US Tons	0.00	0.68	0.54	0.68	0.56	0.43	0.37	0.36	0.46	0.38	0.52	0.63	0.72	
	Gallons	273,598,332	20,932,632	26,340,552	25,206,804	23,132,382	25,304,076	18,257,820	15,484,098	19,580,442	21,378,924	23,697,660	24,680,838	29,602,104	

Tank VOCs & Th	roughput - by Pr	oduct Store	d											
		Total	2021 / 08	2021 / 09	2021 / 10	2021 / 11	2021 / 12	2022 / 01	2022 / 02	2022 / 03	2022 / 04	2022 / 05	2022 / 06	2022 / 07
Gasoline	VOC Lbs	12,646.68	1,350.93	1,080.73	1,353.65	1,111.35	858.27	746.74	713.90	926.46	764.14	1,034.98	1,257.33	1,448.20
	US Tons	6.32	0.68	0.54	0.68	0.56	0.43	0.37	0.36	0.46	0.38	0.52	0.63	0.72
	Gallons.	273,598,332	20,932,632	26,340,552	25,206,804	23,132,382	25,304,076	18,257,820	15,484,098	19,580,442	21,378,924	23,697,660	24,680,838	29,602,104
Total	VOC Lbs	12,646.68	1,350.93	1,080.73	1,353.65	1,111.35	858.27	746.74	713.90	926.46	764.14	1,034.98	1,257.33	1,448.20
10.0.	VOC US Tons	6.32	0.68	0.54	0.68	0.56	0.43	0.37	0.36	0.46	0.38	0.52	0.63	0.72
	Gallons	273,598,332	20,932,632	26,340,552	25,206,804	23,132,382	25,304,076	18,257,820	15,484,098	19,580,442	21,378,924	23,697,660	24,680,838	29,602,104

08/01/2021

to 07/31/2022

Marathon Pipeline Co.

Rolling 12 Month Emissions & Throughput Summary

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0.17

29,602,104

Tank VOCs &	ֆ Throughլ	put Detail	- by Tank												
			Total	2021 / 08	2021 / 09	2021 / 10	2021 / 11	2021 / 12	2022 / 01	2022 / 02	2022 / 03	2022 / 04	2022 / 05	2022 / 06	2022 / 07
Stockbridge Tank	Gasoline	Standing Lbs	12,298.72	1,324.31	1,047.23	1,321.59	1,081.93	826.09	723.52	694.21	901.56	736.95	1,004.84	1,225.94	1,410.55
681		Working Lbs	347.96	26.62	33.50	32.06	29.42	32.18	23.22	19.69	24.90	27.19	30.14	31.39	37.65
Tank -		Additional Lbs	-	-	-	-	-	-	-	-	-	-	-	-	-
Covered/Internal		Injection Lbs	-	-	-	-	-	-	-	-	-	-	-	-	-
Floating		Total VOC Lbs	12,646.68	1,350.93	1,080.73	1,353.65	1,111.35	858.27	746.74	713.90	926.46	764.14	1,034.98	1,257.33	1,448.20
		Total VOC/8760	1.44	0.15	0.12	0.15	0.13	0.10	0.09	0.08	0.11	0.09	0.12	0.14	0.17
		Gallons	273,598,332	20,932,632	26,340,552	25,206,804	23,132,382	25,304,076	18,257,820	15,484,098	19,580,442	21,378,924	23,697,660	24,680,838	29,602,104
Total		Standing Lbs	12,298.72	1,324.31	1,047.23	1,321.59	1,081.93	826.09	723.52	694.21	901.56	736.95	1,004.84	1,225.94	1,410.55
		Working Lbs	347.96	26.62	33.50	32.06	29.42	32.18	23.22	19.69	24.90	27.19	30.14	31.39	37.65
		Additional Lbs	-	-	-	-	-	-	-	-	-	-	-	-	-
		Injection Lbs	-	-	-	-	-	-	-	-	-	-	-	-	-
		Total VOC Lbs	12,646.68	1,350.93	1,080.73	1,353.65	1,111.35	858.27	746.74	713.90	926.46	764.14	1,034.98	1,257.33	1,448.20

0.13

23,132,382

0.10

25,304,076

0.09

18,257,820

0.08

15,484,098

0.11

19,580,442

0.09

21,378,924

0.12

23,697,660

0.14

24,680,838

Facility Fugiti	Facility Fugitive VOCs - excludes trucks, includes valves, couplings, fittings, etc.													
		Total	2021 / 08	2021 / 09	2021 / 10	2021 / 11	2021 / 12	2022 / 01	2022 / 02	2022 / 03	2022 / 04	2022 / 05	2022 / 06	2022 / 07
Terminal Fugitives	VOC Lbs	227.51	19.32	18.70	19.32	18.70	19.32	19.32	17.45	19.32	18.70	19.32	18.70	19.32
	VOC US Tons.	0.11	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01
Total	VOC LBS	227.51	19.32	18.70	19.32	18.70	19.32	19.32	17.45	19.32	18.70	19.32	18.70	19.32
	VOC U.S. Tons	0.11	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01

1.44

273,598,332

VOC Lbs / 8760

Gallons

0.15

20,932,632

0.12

26,340,552

0.15

25,206,804

Rolling 12 Month **Emissions & Throughput Summary**

08/01/2021 to 07/31/2022

Facility Wide - VOC	s only													
Facility VOC Lbs		Total	2021 / 08	2021 / 09	2021 / 10	2021 / 11	2021 / 12	2022 / 01	2022 / 02	2022 / 03	2022 / 04	2022 / 05	2022 / 06	2022 / 07
Tanks		12,646.68	1,350.93	1,080.73	1,353.65	1,111.35	858.27	746.74	713.90	926.46	764.14	1,034.98	1,257.33	1,448.20
Terminal Fugitives		227.51	19.32	18.70	19.32	18.70	19.32	19.32	17.45	19.32	18.70	19.32	18.70	19.32
Total	VOC Lbs	12,874.19	1,370.25	1,099.43	1,372.97	1,130.05	877.59	766.06	731.35	945.78	782.84	1,054.30	1,276.03	1,467.52
Facility VOC US Tons		Total Tons	2021 / 08	2021 / 09	2021 / 10	2021 / 11	2021 / 12	2022 / 01	2022 / 02	2022 / 03	2022 / 04	2022 / 05	2022 / 06	2022 / 07
Tanks		6.32	0.68	0.54	0.68	0.56	0.43	0.37	0.36	0.46	0.38	0.52	0.63	0.72
Terminal Fugitives		0.11	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01
Total	VOC U.S. Tons	6.44	0.69	0.55	0.69	0.57	0.44	0.38	0.37	0.47	0.39	0.53	0.64	0.73

Facility Wide Poll	lutants - exclu	ding VOCs
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	Total Lbs	2021 / 08	2021 / 09	2021 / 10	2021 / 11	2021 / 12	2022 / 01	2022 / 02	2022 / 03	2022 / 04	2022 / 05	2022 / 06	2022 / 07
Facility Total CO Lbs													
NOx Lbs													
Aldehyde Lbs													
SO2 Lbs													
SOx Lbs													
PM Lbs													
PM2.5 Lbs													
PM10 Lbs													
CO2 Lbs													
CH4 Lbs													
N2O Lbs													
CO2e Lbs													

Stockbridge Station

08/01/2021 to 07/31/2022

Rolling 12 Month Emissions & Throughput Summary

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Marathon Pipeline Co.

		Total	2021 / 08	2021 / 09	2021 / 10	2021 / 11	2021 / 12	2022 / 01	2022 / 02	2022 / 03	2022 / 04	2022 / 05	2022 / 06	2022 / 07
Facility Total	CO US Tons	-	-	-	-	-	-	-	-	-	-	-	-	-
	NOx US Tons	-	-	-	-	-	-	-	-	-	-	-	-	-
	Aldehyde US Tons	-	-	-	-	-	-	-	-	-	-	-	-	-
	SO2 US Tons	-	-	-	-	-	-	-	-	-	-	-	-	-
	SOx US Tons	-	-	-	-	-	-	-	-	-	-	-	-	-
	PM US Tons	-	-	-	-	-	-	-	-	-	-	-	-	-
	PM 2.5 US Tons	-	-	-	-	-	-	-	-	-	-	-	-	-
	PM 10 US Tons	-	-	-	-	-	-	-	-	-	-	-	-	-
	CO2 Metric Tons	-	-	-	-	-	-	-	-	-	-	-	-	-
	CH4 Metric Tons.	•	-	-	-	-	-	-	-	-	-	-	-	-
	N2O Metric Tons	•	-	-	-	-	-	-	-	-	-	-	-	-
	CO2e Metric Tons	-	-	-	-	-	-	-	-	-	-	-	-	-

Rolling 12 Month Emissions & Throughput Summary

08/01/2021 to 07/31/2022

Source Product		Total LBS	2021 / 08	2021 / 09	2021 / 10	2021 / 11	2021 / 12	2022 / 01	2022 / 02	2022 / 03	2022 / 04	2022 / 05	2022 / 06	2022 / 07
From	Benzene Lbs	115.87	12.33	9.89	12.36	10.17	7.90	6.89	6.58	8.51	7.05	9.49	11.48	13.21
Gasolines	Ethylbenzene Lbs	12.87	1.37	1.10	1.37	1.13	0.88	0.77	0.73	0.95	0.78	1.05	1.28	1.47
	Hexane Lbs	205.99	21.92	17.59	21.97	18.08	14.04	12.26	11.70	15.13	12.53	16.87	20.42	23.48
	Toluene Lbs	167.36	17.81	14.29	17.85	14.69	11.41	9.96	9.51	12.30	10.18	13.71	16.59	19.08
	Trimethylbenzen (1,2,4) Lbs	-	-	-	-	-	-	-	-	-	-	-	-	-
	Trimethylpentane (2,2,4) Lbs	102.99	10.96	8.80	10.98	9.04	7.02	6.13	5.85	7.57	6.26	8.43	10.21	11.74
	Xylene Lbs	64.37	6.85	5.50	6.86	5.65	4.39	3.83	3.66	4.73	3.91	5.27	6.38	7.34
	Naphthalene Lbs	-	-	-	-	-	-	-	-	-	-	-	-	-
	Cumene Lbs	1.29	0.14	0.11	0.14	0.11	0.09	0.08	0.07	0.09	0.08	0.11	0.13	0.15
	Total HAP Lbs.	670.75	71.39	57.28	71.53	58.88	45.72	39.91	38.10	49.28	40.79	54.93	66.48	76.46
Totals	Benzene	115.87	12.33	9.89	12.36	10.17	7.90	6.89	6.58	8.51	7.05	9.49	11.48	13.21
	Ethylbenzene	12.87	1.37	1.10	1.37	1.13	0.88	0.77	0.73	0.95	0.78	1.05	1.28	1.47
	Hexane	205.99	21.92	17.59	21.97	18.08	14.04	12.26	11.70	15.13	12.53	16.87	20.42	23.48
	Toluene	167.36	17.81	14.29	17.85	14.69	11.41	9.96	9.51	12.30	10.18	13.71	16.59	19.08
	Trimethylbenzene(1,2,4)	-	-	-	-	-	-	-	-	-	-	-	-	-
	Trimethylpentane(2,2,4)	102.99	10.96	8.80	10.98	9.04	7.02	6.13	5.85	7.57	6.26	8.43	10.21	11.74
	Xylene	64.37	6.85	5.50	6.86	5.65	4.39	3.83	3.66	4.73	3.91	5.27	6.38	7.34
	Naphthalene	-	-	-	-	-	-	-	-	-	-	-	-	-
	Cumene	1.29	0.14	0.11	0.14	0.11	0.09	0.08	0.07	0.09	0.08	0.11	0.13	0.15
	Total HAP Lbs	670.75	71.39	57.28	71.53	58.88	45.72	39.91	38.10	49.28	40.79	54.93	66.48	76.46

Stockbridge Station

08/01/2021 to 07/31/2022

Rolling 12 Month Emissions & Throughput Summary

opsEnvironmental

Marathon Pipeline Co.

Total - HAP Tons		Total TONS	2021 / 08	2021 / 09	2021 / 10	2021 / 11	2021 / 12	2022 / 01	2022 / 02	2022 / 03	2022 / 04	2022 / 05	2022 / 06	2022 / 07
Totals	Benzene	0.058	0.006	0.005	0.006	0.005	0.004	0.003	0.003	0.004	0.004	0.005	0.006	0.007
	Ethylbenzene	0.006	0.001	0.001	0.001	0.001	-	-	-	-	-	0.001	0.001	0.001
	Hexane	0.400	0.011	0.009	0.011	0.009	0.007	0.006	0.006	0.008	0.006	0.008	0.010	0.012
	Toluene	0.004	0.009	0.007	0.009	0.007	0.006	0.005	0.005	0.006	0.005	0.007	0.008	0.010
	Trimethylbenzene(1,2,4)	-	-	-	-	-	-	-	-	-	-	-	-	-
	Trimethylpentane(2,2,4)	0.054	0.005	0.004	0.005	0.005	0.004	0.003	0.003	0.004	0.003	0.004	0.005	0.006
	Xylene	0.022	0.003	0.003	0.003	0.003	0.002	0.002	0.002	0.002	0.002	0.003	0.003	0.004
	Napthalene	-	-	-	-	-	-	-	-	-	-	-	-	-
	Cumene	0.001	-	-	-	-	-	-	-	-	-	-	-	-
	Total HAP Tons	0.335	0.036	0.029	0.036	0.029	0.023	0.020	0.019	0.025	0.020	0.027	0.033	0.038

Rolling 12 Month **Emissions & Throughput Summary**

opsEnvironmental

Marathon Pipeline Co.

NOTES FOR FACTORS & CALCULATIONS:

- » VOCs from controlled loading of Gasoline (truck / barge / rail) uses the stack test mg/L in effect during loading. [ControlEfficiency mg/L * 3.7854 * 2.2046 / 1000 * Thruput-Gas / 1000]
- » Temperatures and windspeeds in tank calculations are from the TANKS4 Meteorological tables, using the 30 Year U. S. Monthly Climate Normals 1961-1990, National Climatic Data Center, Asheville, NC.
- VOCs from uncontrolled loading of Gasoline & all truck, barge, and rail loading of Distillate, Ethanol, Other Organics uses AP-42, Ch 5, Jun 2008, Pg 5.2-4 reduced by capture & control efficiency on Pq 5.2-6:

[(12.46 * Vap.Mol.Wt * SaturationFactor * TVP / BulkLiquidTemp°R) * (Thruput / 1000) * ((100 - ControlEff%) / 100) * (CaptureEff% / 100)] where where Capture Eff% relates to the truck fugitive rate. 8 mg/l = 99.21%, 9 mg/l = 99.11%(being phased out), 13 mg/l = 98.72%. Derived from ((1 - (mg/l / 1014)) / 100), where 1014 is the density of 1 litre of saturated gasoline vapors from EPA-453/R-94-002b U.S. EPA RTP, NC Nov 1994 "Gasoline Distribution Industry (Stage I) - Background Information for Promulgated Standards", Pg A-4. Uncontrolled barge loading uses the factors from AP-42, Ch 5.2, Jun 2008, tables 5.2-2 and 5.2-6.

- Truck Fugitives from loading Gasoline uses fixed rate determined by permit or MACT status. The formula is: [FugitiveRate mg/L * 3.785 / 453.600 * Thruput-Gas / 1000)] where the Fugitive Rate is 8 mg/l for MACT facilities and those where the trailers must pass a 1" pressure decay test, 13 mg/l for all other facilities where the trailers must pass a 3" pressure decay test. Some states and permits call for 9 mg/l (rather than 13) based on a study from Radian Corp but the API does not recognize the value.
- » Truck Fugitives from loading Distillate, Ethanol, and Other Organics uses AP-42, Ch 5, Jun 2008, Pg 5.2-4 reduced by the capture efficiency. [(12.46 * Mol.Wt * SaturationFactor * TVP / BulkLiquidTemp°R) * (Thruput-NonGas / 1000) * ((100 - CaptureEff%) / 100)] where Capture Eff% relates to the truck fugitive rate. 8 mg/l = 99.21%, 9 mg/l = 99.11% (being phased out), 13 mg/l = 98.72%. Derived from ((1 - (mg/l / 1014)) / 100) where 1014 is the density of 1 litre of saturated gasoline vapors from EPA-453/R-94-002b U.S. EPA RTP, NC Nov 1994 "Gasoline Distribution Industry (Stage I) - Background Information for Promulgated Standards", Pg A-4.
- By-products of combustion from Combustors, Boilers, Heaters, and Engines. Reference AP-42 Ch 1.3 Fuel Oil Combustion, May 2010; AP-42 Ch 1.4 Natural Gas Combustion, July 1998; 40 CFR 98 Mandatory Reporting of GHGs; Final Rule, where applicable.
- » Tank Emissions are calculated using AP-42 Chapter 7.1, Nov. 2006
- » Oil / Water Separator emissions: [(Factor in Ib/Gal * Thruput-Water / 1000)] Factors from AP-42, Ch 5.1, Apr 2015, Pg 5.1-16, Tbl 5.1-3, Fugitive Emission Factors for Petroleum Refineries, Oil / Water Separators.
- » WAT tank emission factors: The petroleum is stripped out in the OWS and the contact water is in equilibrium by the time it hits the WAT tanks. This is based on sampling where approximately 50 ppm hydrocarbon was found. (So low that there would be no emissions if left alone.)
 - >> WAT tanks if not sparged use 0 lb/1,000 gal thruput. (equilibrium)
 - >> WAT tanks if sparged and vented to the atmosphere, use 0.42 lb VOC / 1,000 gal water thruput. (Sparging removes the remaining hydrocarbons) (50 ppm = (50 lb/1,000,000 lb water) * (8.3454 lbs water * 1000 gal)).
 - >> WAT tanks if sparged and vented to VRU use 0.021 lb VOC / 1,000 gal water (95% collection efficiency of the remaining hydrocarbons is assumed).

Rolling 12 Month Emissions & Throughput Summary

08/01/2021 to 07/31/2022

opsEnvironmental

NOTES FOR FACTORS & CALCULATIONS - Continued

Speciation Notes:

		nt Percent			
POLLUTANT	Ethanol *	Gasolines	Distillates	Crude	
BENZENE	0.0450 %	0.9000 %	0.0200%	1.1400 %	
ETHYLBENZENE	0.0050 %	0.1000 %	0.0400%	0.0750 %	
HEXANE	0.0800 %	1.6000 %	0.0100%	1.2100 %	
TOLUENE	0.0650 %	1.3000 %	0.2600%	0.5700 %	
TRIMETHYLBENZNE(1,2,4)	0.0000 %	0.0000 %	0.0000%	0.0130 %	
TRIMETHYLPENTANE(2,2,4)	0.0400 %	0.8000 %	0.0000%	0.1000 %	
XYLENE	0.0250 %	0.5000 %	0.6900%	0.3300 %	
NAPHTHALENE	0.0000 %	0.0000 %	0.2550%	0.0000 %	
CUMENE	0.0005 %	0.0100 %	0.0100%	0.0100 %	

Butane Calculations:

Terminal Specific Notes:

- » Gasoline speciation data taken from Gasoline Distribution Industry (Stage 1) Background Information for Proposed Standards for the MACT regulation Table C-5 (EPA-435/R-94-002a)
- » Distillate speciation data taken from Karin Ritter (American Petroleum Institute) memo to the Gasoline Distribution MACT Workgroup dated Feb. 8, 1995 containing speciation data submitted by various API member companies.
- » Asphalt speciation data As industry accepted HAPs speciation is unavailable, MPC has chosen to reflect HAPs from Asphalt VOCs as the same as for distillates.
- » Crude speciation data Taken from TANKS 4.09 liquid speciation of crude at 76 degrees F.



10 Year Internal Floating Roof (IFR) Seal Inspection Form

General Tank Info	rmation									
Date: 4-23-2:	2 Location: C	10.11	Tank #:							
Tank Diameter: 150	Product ·	Product: 100kbridge m								
Site Mgr: Cedrick Cot	Project AA	DUSC/INS FIGURE LEVEL:			25"					
Primary Seal (Circle Se	Project Mgr:	Type Rupp	Inspector:	n Flayi	ับา					
A acquirence 26:	al type)	Secondary Sea	(If Applicable - Circ	cle Seal T	vpe)					
Mechanical Shoe Seal	Foam Log Seal	Compres Plate or S		Rim-M Wip						
Questions	Responses									
				Yes	No	N/A				
1. Is the floating roo	f currently floating?			/						
shell (Is the seal for	seal completely cover the sp ee of holes, tears and defect	ace between the II	R and tank	/						
3. If installed, does t	he secondary seal completel	s)r v cover the space b	etween the	•						
IFR and tank shell	(Is the seal free of holes, tea	rs and defects)?	etween the			1				
Is each manway of	n the IFR closed with bolted	gasketed lids whe	n not in use?	1						
Are leg actuated leg closed, except for	pleeder vent(s) or pressure/v when roof is in the process	acuum vent(s) gas of being floated or	keted and landed?	1						
If applicable, are	rim space vents gasketed and	d closed?				1				
	ill sample wells or temperatu is 90% or more closed?	re probe funnels t	nat have a slit	/						
	Il emergency drains have a some type of float style cover?		is 90% or			1				
	Il fixed roof support columns		oric sleeve seal	/						
10. If applicable, do	es each ladder or gauge pole gasketed sliding cover?	e ladder combo pe	netrating below	1	l i					
If all YES responses:	Submit form to MPL ESR Ai									
If there are any NO responses:	Make notification as soon a ESR Air Program Coordinat Submit form to MPL ESR Air	as practical, but no la or and MPL Tank SIL	ater than the next	busines	s day t	o MPL				

Month-Year	Equipment Name	MaterialName	Monthly VOCs (lbs)	Rolling 12 Month Total VOCs (tons)	Monthly Throughput (gals)	Rolling 12 Month Total Throughput (gals)
Feb-19	Stockbridge Tank 681	GAS CONVENTIONAL RVP 15.0	731.06		28,973,574	
Mar-19	Stockbridge Tank 681	GAS CONVENTIONAL RVP 13.5	928.62		21,281,274	
Apr-19	Stockbridge Tank 681	GAS CONVENTIONAL RVP 09.0	749.89		10,176,894	
May-19	Stockbridge Tank 681	GAS CONVENTIONAL RVP 09.0	1,034.35		23,206,680	
Jun-19	Stockbridge Tank 681	GAS CONVENTIONAL RVP 09.0	1,255.68		23,388,540	
		GAS CONVENTIONAL RVP 09.0	1,444.09		26,371,758	
Aug-19	Stockbridge Tank 681	GAS CONVENTIONAL RVP 09.0	1,357.32		25,953,480	
		GAS CONVENTIONAL RVP 09.0	1,080.08		25,834,830	
		GAS CONVENTIONAL RVP 13.5	1,350.46		22,705,326	
		GAS CONVENTIONAL RVP 15.0	1,118.39		28,667,142	
		GAS CONVENTIONAL RVP 15.0	857.52		24,711,708	
		GAS CONVENTIONAL RVP 15.0	753.62	6.33	23,666,790	284,937,996
		GAS CONVENTIONAL RVP 15.0	748.80	6.34	23,425,794	279,390,216
		GAS CONVENTIONAL RVP 13.5	924.72	6.34	18,208,134	276,317,076
		GAS CONVENTIONAL RVP 09.0	742.44	6.33	1	270,456,858
		GAS CONVENTIONAL RVP 09.0	1,018.73	6.33		258,175,554
		GAS CONVENTIONAL RVP 09.0	1,254.95	6.33	±	257,595,996
		GAS CONVENTIONAL RVP 09.0	1,442.40	6.32	25,046,616	256,270,854
		GAS CONVENTIONAL RVP 09.0	1,354.95	6.32	24,094,854	254,412,228
		GAS CONVENTIONAL RVP 09.0	1,076.98	6.32	23,397,276	251,974,674
		GAS CONVENTIONAL RVP 13.5	1,354.61	6.32	25,962,678	255,232,026
		GAS CONVENTIONAL RVP 15.0	1,105.56	6.32		245,147,532
		GAS CONVENTIONAL RVP 15.0	844.63	6.31	14,581,602	235,017,426
		GAS CONVENTIONAL RVP 15.0	753.71	6.31	23,736,594	235,087,230
		GAS CONVENTIONAL RVP 15.0	711.03	6.29	13,224,876	224,886,312
		GAS CONVENTIONAL RVP 13.5	927.30			226,918,482
		GAS CONVENTIONAL RVP 09.0	763.77	6.30	21,088,032	243,689,838
		GAS CONVENTIONAL RVP 09.0	1,022.73	6.31	14,064,498	246,828,960
		GAS CONVENTIONAL RVP 09.0	1,258.53	6.31	25,628,820	249,648,798
		GAS CONVENTIONAL RVP 09.0	1,436.56	6.31	20,454,336	245,056,518
		GAS CONVENTIONAL RVP 09.0	1,350.93	6.30	±	241,894,296
		GAS CONVENTIONAL RVP 09.0	1,080.73	6.31	26,340,552	244,837,572
		GAS CONVENTIONAL RVP 13.5	1,353.65	6.30		244,081,698
		GAS CONVENTIONAL RVP 15.0	1,111.35	6.31	23,132,382	248,631,432
		GAS CONVENTIONAL RVP 15.0	858.27	6.31	25,304,076	259,353,906
		GAS CONVENTIONAL RVP 15.0	746.74	6.31	18,257,820	253,875,132
		GAS CONVENTIONAL RVP 15.0	713.90	6.31	15,484,098	256,134,354
		GAS CONVENTIONAL RVP 13.5	926.46	6.31	19,580,442	255,474,492
		GAS CONVENTIONAL RVP 09.0	764.14	6.31	21,378,924	255,765,384
		GAS CONVENTIONAL RVP 09.0	1,034.98	6.32		265,398,546
		GAS CONVENTIONAL RVP 09.0	1,257.33	6.32	24,680,838	264,450,564
Jul-22	Stockbridge Tank 681	GAS CONVENTIONAL RVP 09.0	1,448.20	6.32	29,602,104	273,598,332

Tank TVP Summary

Discard: September 203

9/13/2022 11:26:40AM

Retention: Air Pollution Records - 8260 - 6 Yrs

STKBRG

Stockbridge Station

Tank: Stockbridge Tank 681 (Internal Floater - Cone/Flat

RoofBegin Date	End Date	Material Name	Throughput (Gal)	True Vapor Pressure
01/01/2021	02/01/2021	Gas Conventional RVP 15.0	23,736,594	3.8290
02/01/2021	03/01/2021	Gas Conventional RVP 15.0	13,224,876	4.0312
03/01/2021	04/01/2021	Gas Conventional RVP 13.5	20,240,304	4.4830
04/01/2021	05/01/2021	Gas Conventional RVP 09.0	21,088,032	3.6391
05/01/2021	06/01/2021	Gas Conventional RVP 09.0	14,064,498	4.5988
06/01/2021	07/01/2021	Gas Conventional RVP 09.0	25,628,820	5.5398
07/01/2021	08/01/2021	Gas Conventional RVP 09.0	20,454,336	6.0189
08/01/2021	09/01/2021	Gas Conventional RVP 09.0	20,932,632	5.7345
09/01/2021	10/01/2021	Gas Conventional RVP 09.0	26,340,552	4.8860
10/01/2021	11/01/2021	Gas Conventional RVP 13.5	25,206,804	6.0758
11/01/2021	12/01/2021	Gas Conventional RVP 15.0	23,132,382	5.4767
12/01/2021	01/01/2022	Gas Conventional RVP 15.0	25,304,076	4.2836
Tank: S	Stockbridge Ta	nk 681 Total Throughput & Average TVP:	259,353,906	4.8830