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Angela S. Brown  
Vice President  
MPLX Terminals LLC  
539 South Main Street  
Findlay, Ohio 45840

RE: Permit Nos. 0570080-049-AC and 0570080-050-AV  
MPLX Terminals LLC – Tampa Terminal  
Air Construction Permit and Revised Title V Air Operation Permit

Dear Ms. Brown:

Enclosed is the replacement permit package for an air construction permit and a revised Title V air operation permit for MPLX Terminals LLC, MPLX Terminals LLC – Tampa Terminal. This action re-issues and replaces the Notice of Intent to Issue Air Permits that was issued on October 25, 2018, for this project in order to address comments that were received on the original Notice of Intent. This facility is located in Hillsborough County at 425 South 20th Street, Tampa, FL 33605. The permit package includes the following documents:

- The draft air construction permit and supporting technical evaluation and preliminary determination document.
- The statement of basis, which summarizes the facility, the equipment and the primary rule applicability for the initial Title V air operation permit.
- The draft/proposed revised Title V air operation permit, which includes the specific permit conditions that regulate the emissions units covered by the proposed project.
- The Written Notice of Intent to Issue Air Permits provides important information regarding: the Permitting Authority's intent to issue air permits for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue air permits; the procedures for submitting comments on the draft/proposed permits; the process for filing a petition for an administrative hearing; and the availability of mediation.
- The Public Notice of Intent to Issue Air Permits is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The Public Notice of Intent to Issue Title V Air Permits must be published as soon as possible and the proof of publication must be provided to the Department within seven days of the date of publication. Because this permit is being processed as a combined draft/proposed permit in order to reduce processing time, a duplicate copy of the proof of publication must also be transmitted by electronic mail within seven days of the date of publication to EPA Region 4 at the following address: [R4TitleVFL@epa.gov](mailto:R4TitleVFL@epa.gov).

If you have any questions, about the enclosed permitting package or if you wish to submit comments regarding the draft permit during the comment period, please contact the Project Engineer, Sahand Nasseris, P.E., by telephone at 813-627-2600 or by email at [nasseris@epchc.org](mailto:nasseris@epchc.org).

Executed in Hillsborough County

Janet L. Dougherty  
Executive Director

Date

JDL/SN/sn

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**Roger P. Stewart Center**

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**1. PERMITTEE**

MPLX Terminals LLC  
539 South Main Street  
Findlay, Ohio 45840

**2. Permitting Authority**

Environmental Protection Commission of Hillsborough County (EPCHC)  
3629 Queen Palm Dr.  
Tampa, FL 33619

**3. PROJECT**

Air Permit Nos. 0570080-050-AV and 0570080-049-AC  
Minor Air Construction Permit and Revised Title V Air Operation Permit  
MPLX Terminals LLC – Tampa Terminal

This project is to modify the material handling operation to: (1) authorize the increase of the facility-wide Particulate Matter emissions limit; (2) establish the capacity of the ship unloading and truck loading activities; and (3) authorize truck unloading of off-site material into the storage piles.

**4. NOTICE AND PUBLICATION**

The EPCHC distributed a concurrent draft minor air construction permit and draft/proposed TV revision package on October 9, 2018.

**COMMENTS (October 16, 2018)**

**Applicant**

On October 16, 2018, Mr. Andrew Taggart of ETC, Inc., the facility consultant, submitted comments on the Draft Permits via email, on behalf of MPLX Terminals LLC. In addition, on October 25, 2018, EPC received HAPs emissions estimates from the equipment leaks. The following summarizes the comments and the EPCHC's response.

**Comment No. 1:** With regards to condition FW10 and the new HAPS limits, you had said that the sole authority necessary for this change came from FDEP internally. Can you provide a memo or some sort of documentation requiring/directing this HAPS emissions limit change?

**Response:** In order to properly establish the facility as a Synthetic non-TV source of HAPs, a federally enforceable limit should be reflected in the air operation permit. In accordance with Rule 62-210.200(PTE), F.A.C., Potential to Emit is the maximum capacity of an emission unit or facility to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the emissions unit or facility to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is federally enforceable. Therefore, the HAPs limitations are reflected under FW10. of both Construction Permit No. -049-AC and TV Revision Permit No. -050-AV based on the throughput limits, as follows:

**FW10. HAPs Emissions.** As requested by the permittee, in order to limit the potential to emit for Hazardous Air Pollutants (HAP), as defined in Rule 62-210.200, F.A.C., the HAP emissions shall be less than ~~4.8~~ **3** tons in any 12 consecutive month period for any individual HAP, and less than ~~9.3~~ **10** tons in any 12 consecutive month period for any combination of HAPs. [Rules 62-210.200(245) and 62-4.070(3), F.A.C., Application No.



0570080-049-AC]

**Comment No. 2:** In the draft permit, Condition B.13 provides requirements for monitoring and compliance for tanks with external floating roofs. However, the Tampa Terminal has no tanks with external floating roofs. Given the absence of external floating roofs, can we remove condition B.13 from the permit?

**Response:** Since there are no tanks with external floating roofs in the facility, Specific Condition No. B.13. has been removed, as requested by the applicant. The applicable requirements to external floating roofs under NESHAP 40 CFR 63, Subpart BBBBBB are reflected under Appendix BBBBBB.

**Comment No. 3:** Condition A.14 for a leak test apparently cites a 1978 EPA document, rather than a federal or state regulation. Even though the facility is likely already in compliance with this condition, is it necessary to have it included in the permit?

**Response:** As requested by the applicant, Specific Condition No. A.14 has been removed from the permit. All applicable requirements for equipment leak checks are reflected under Subsection C. of the TV Operation Permit No. 0570080-050-AV.

**ADDITIONAL COMMENT (November 5, 2018)**

**Comment:** As a follow up to Comment No. 1 above, MPLX wanted further clarification on establishing the HAP limits in the permit, and also asking for flexibility on these limits.

**Response:** After further review and discussions with FDEP-Tallahassee and MPLX, in order to provide flexibility and still provide reasonable assurance that the facility will not be a major source of HAPs, the HAP limits are being revised, as follows:

**FW10. HAPs Emissions.** As requested by the permittee, in order to limit the potential to emit for Hazardous Air Pollutants (HAP), as defined in Rule 62-210.200, F.A.C., the HAP emissions shall be less than 3 **4** tons in any 12 consecutive month period for any individual HAP, and less than 40 **11** tons in any 12 consecutive month period for any combination of HAPs. [Rules 62-210.200(245) and 62-4.070(3), F.A.C., Application No. 0570080-049-AC]

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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*In the Matter of an*

*Application for an Air Construction Permit and a Revised Title V Air Operation Permit by:*

MPLX Terminals LLC  
539 South Main Street  
Findlay, Ohio 45840

*Responsible Official:*

Ms. Angela S. Brown, Vice President

Permit Nos. 0570080-050-AV and  
0570080-049-AC

Facility ID No. 0570080  
MPLX Terminals LLC – Tampa Terminal  
Air Construction Permit  
Revised Title V Air Operation Permit  
Hillsborough County, Florida

**Facility Location:** MPLX Terminals LLC – Tampa Terminal operates a bulk petroleum receiving and distribution facility located in Hillsborough County at 425 South 20th Street, Tampa, FL 33605.

**Project:** The purpose of this project is to issue an air construction permit and a revised Title V operation permit for the facility. Details of the project are provided in the application and the enclosed Statement of Basis.

The construction permit establishes the portable diesel fuel water pump (EU No. 023) as a non-emergency engine. Since there is no testing requirement associated with this project, the AC permit is being issued concurrently with the Title V revision permit. Also, the TV revision project incorporates the completed butane blending system, which was authorized under Construction Permit No. 0570080-048-AC. In addition, as requested by the applicant and in accordance with the EPA guidance memo dated January 25, 2018, since the facility is now an area source of HAP, the TV permit revision removes the requirements of the major source NESHAP (40 CFR 63, Subparts R and DDDDD) and incorporates applicable requirements of the area source NESHAP (40 CFR 63, Subpart BBBB).

**Permitting Authority:** Applications for the air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work.

Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility.

The Environmental Protection Commission of Hillsborough County is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical/mailling address is: 3629 Queen Palm Drive, Tampa, FL 33619. The Permitting Authority's telephone number is 813/627-2600.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the draft air construction permit, the technical evaluation and preliminary determination, the draft/proposed Title V air operation permit, the statement of basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft/proposed permits by visiting the following website: <https://fldep.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit number shown above. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

**Notice of Intent to Issue Permit:** The Permitting Authority gives notice of its intent to issue a revised air construction permit to the applicant for the project described above. This Notice of Intent withdraws and replaces the Notice of Intent that was issued on October 25, 2018. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all



## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final permit in accordance with the conditions of the draft air construction permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

The Permitting Authority gives notice of its intent to issue a revised Title V air operation permit to the applicant for the project described above. This Notice of Intent withdraws and replaces the Notice of Intent that was issued on October 25, 2018. The applicant has provided reasonable assurance that continued operation of the existing equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final permit in accordance with the conditions of the draft/proposed permit unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

**Public Notice:** Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at the above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

**Comments:** The Permitting Authority will accept written comments concerning the draft air construction permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the draft air construction permit, the Permitting Authority shall revise the draft air construction permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

The Permitting Authority will accept written comments concerning the draft/proposed Title V air operation permit for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.), on or before the end of this 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Register (FAR). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the draft/proposed permit, the Permitting Authority shall issue a revised draft/proposed permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number. The revisions shown in the project description, above, and detailed in the Statement of Basis for this permitting project are the only portions of the permit that are open for public comment or challenge. Comments received related to the remainder of the permit will not be addressed during this permitting action.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this written notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S.,



## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this written notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) with the Environmental Protection Commission of Hillsborough County's Legal Office, 3629 Queen Palm Drive, Tampa, FL 33619 before the deadline. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, any email address, telephone number and any facsimile number of the petitioner; the name, address, any email address, telephone number, and any facsimile number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.

**EPA Review:** EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period, provided that the applicant also transmits an electronic copy of the required proof of publication directly to EPA at the following email addresses: [R4TitleVFL@epa.gov](mailto:R4TitleVFL@epa.gov). Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following website address: <http://www2.epa.gov/caa-permitting/florida-proposed-title-v-permits>.

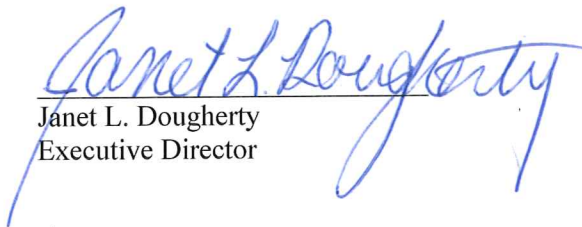
**Objections:** Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

petition shall be based only on objections to the Permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. Environmental Protection Agency, Office of the Administrator, 1200 Pennsylvania Avenue, N.W., Mail Code: 1101A, Washington, DC 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at <http://www2.epa.gov/caa-permitting/florida-proposed-title-v-permits>.

Executed in Hillsborough County, Florida.

Environmental Protection Commission  
of Hillsborough County

  
Janet L. Dougherty  
Executive Director

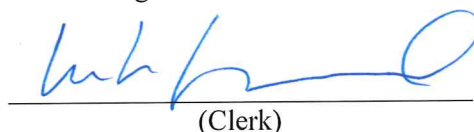
### CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that either this Written Notice of Intent to Issue an Air Construction Permit and a Revised Title V Air Operation Permit (including the Public Notice, the Statement of Basis, the Draft/Proposed Permits and Technical Evaluation and Preliminary Determination), or a link to these documents available electronically on a publicly accessible server, was sent by electronic mail with received receipt requested to the persons listed below:

Angela S. Brown, MPLX Terminals LLC ([asbrown@marathonpetroleum.com](mailto:asbrown@marathonpetroleum.com))  
Robert Jarabeck, MPLX Terminals LLC ([rjarabeck@marathonpetroleum.com](mailto:rjarabeck@marathonpetroleum.com))  
Bill Strong, MPLX Terminals LLC ([wtstrong@marathonpetroleum.com](mailto:wtstrong@marathonpetroleum.com))  
William F. Karl, P.E., ECT, Inc. ([bkarl@ectinc.com](mailto:bkarl@ectinc.com))  
Andrew J. Taggart, ECT, Inc. ([ataggart@ectinc.com](mailto:ataggart@ectinc.com))  
Ms. Barbara Friday, OPC [[barbara.friday@dep.state.fl.us](mailto:barbara.friday@dep.state.fl.us)] (for posting with Region 4, U.S. EPA)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

 11/9/18  
(Clerk) (Date)