

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS**

MARATHON ASHLAND PETROLEUM, LLC)
Platformer Vent Gas Scrubber)
)
) PCB 07-
) (Tax Certification)
PROPERTY IDENTIFICATION NUMBER)
51-34-1-21 or portion thereof)

NOTICE

TO: *[Electronic filing]*
Dorothy Gunn, Clerk
Illinois Pollution Control Board
State of Illinois Center
100 W. Randolph Street, Suite 11-500
Chicago, Illinois 60601

[Service by mail]
John S. Swearingen
Marathon Ashland Petroleum
Refinery Office Building
Robinson, Illinois 62454

[Service by mail]
Steve Santarelli
Illinois Department of Revenue
101 West Jefferson
P.O. Box 19033
Springfield, Illinois 62794

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Pollution Control Board the **APPEARANCE** and **RECOMMENDATION** of the Illinois Environmental Protection Agency, a paper copy of which is herewith served upon the applicant and a representative of the Illinois Department of Revenue.

Respectfully submitted by,

/s/ Robb H. Layman
Robb H. Layman
Assistant Counsel

Date: January 4, 2007

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276
Telephone: (217) 524-9137

2. The applicant's address is as follows:

Marathon Ashland Petroleum, LLC
Refinery Office Building
Robinson, Illinois 62454

3. The subject matter of this request consists of a Platformer Vent Gas Scrubber that will reduce the hydrogen chloride content of the regeneration vent gas from the continuous catalyst regeneration process in order to comply with applicable federal MACT II regulations. The scrubber will reduce the hydrogen chloride content of the process stream from a range of 500 and 1000 parts per million to less than 1 parts per million. Hydrogen chloride is an acid gas and is regulated as a hazardous air pollutant.

4. Section 11-10 of the Property Tax Code, 35 ILCS 200/11-10 (2002), defines "pollution control facilities" as:

"any system, method, construction, device or appliance appurtenant thereto, or any portion of any building or equipment, that is designed, constructed, installed or operated for the primary purpose of: (a) eliminating, preventing, or reducing air or water pollution... or (b) treating, pretreating, modifying or disposing of any potential solid, liquid, gaseous pollutant which if released without treatment, pretreatment, modification or disposal might be harmful, detrimental or offensive to human, plant or animal life, or to property."

5. Pollution control facilities are entitled to preferential tax treatment, as provided by 35 ILCS 200/11-5 (2002).

6. Based on information in the application and the underlying purpose of the Platformer Vent Gas Scrubber to prevent, eliminate or reduce air pollution, it is the

this instance, it should be noted that the parcel number identified in the application form submitted by Marathon Ashland contains a typographical error. The numbers depicted on the application form, shown in Exhibit A attached hereto, identify the first two digits of the property's parcel number as 54. Prior tax certification requests for the refinery, as received by the Illinois EPA and eventually acted upon by the Board, have employed a parcel number whose first two digits are 51. Prior to this filing, the undersigned attorney contacted Marathon Ashland's designated representative, Mr. Dennis Baker, regarding the apparent discrepancy. Mr. Baker confirmed that the correct parcel number for this tax certification request is 51-34-1-21.

Illinois EPA's engineering judgment that the described project and/or equipment may be considered as "pollution control facilities" in accordance with the statutory definition and consistent with the Board's regulations at 35 Ill. Adm. Code 125.200. **[Exhibit B]**.

7. Because the modification to the Platformer Vent Gas Scrubber satisfies the aforementioned criteria, the Illinois EPA recommends that the Board **grant** the applicant's requested tax certification.

Respectfully submitted by,

/s/ Robb H. Layman

Robb H. Layman
Assistant Counsel

DATED: January 4, 2007

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
Telephone: (217) 524-9137

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of January, 2007, I electronically filed the following instruments entitled **NOTICE, APPEARANCE** and **RECOMMENDATION** with:

Dorothy Gunn, Clerk
Illinois Pollution Control Board
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601

and, further, that I did send a true and correct paper copy of the same foregoing instruments, by First Class Mail with postage thereon fully paid and deposited into the possession of the United States Postal Service, to:

Steve Santarelli
Illinois Department of Revenue
101 West Jefferson
P.O. Box 19033
Springfield, Illinois 62794

John S. Swearingen
Marathon Ashland Petroleum
Refinery Office Building
Robinson, Illinois 62454

/s/ Robb H. Layman
Robb H. Layman
Assistant Counsel



Property & Severance Tax Department

Marathon Petroleum Company LLC

539 South Main Street
Findlay, OH 45840-3295
Telephone 419/422-2121

January 30, 2006

Mr. Don Sutton
Bureau of Air - Number 11
1021 North Grand Avenue - East
Springfield, IL 62702

Re: Application for Certification Pollution Control Facility

Dear Mr. Sutton:

Prior to December 31, 2005, Marathon Petroleum Company submitted five applications for facilities at our Robinson Refinery in Crawford County, Illinois. The applications were for the following units:

- Platformer Vent Gas Scrubber
- Gasoline Desulfurization Unit (GDU)
- Steam Supply to #1 and #5 Flares
- Crude Unit Off-Gas Handling
- Ultraformer 3 F-1 and 3F-2 CEMs

Shortly after the start of the new year, I contacted Mr. Floyd McKinney and advised him that Marathon would be submitting amended applications for two of the units, the Platformer Vent Gas Scrubber and the GDU.

The amended applications are attached, please forward to Mr. McKinney and begin the review process.

If there are questions or comments, please contact me at 419-421-3759.

Thank you for your help in this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Dennis Baker'.

Dennis Baker
Tax Agent

RECEIVED
FEB 01 2006
IEPA - DAPC - SPFLD

Exhibit A

APPLICATION FOR CERTIFICATION (PROPERTY TAX TREATMENT)
 POLLUTION CONTROL FACILITY
 AIR WATER

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
 P. O. Box 19276, Springfield, IL 62794-9276

This Agency is authorized to request this information under Illinois Revised Statutes, 1979, Chapter, 120, Section 502a-5. Disclosure of this information is voluntary. However, failure to comply could prevent your application from being processed or could result in denial of your application for certification.

FOR AGENCY USE

File No.	Date Received	Certification No.	Date		
Sec. A APPLICANT	Company Name Marathon Petroleum Company LLC			AMENDED	
	Person Authorized to Receive Certification John Swearingen		Person to Contact for Additional Details Debora Krupp		
	Street Address Refinery Office Building		Street Address 539 South Main Street		
	Municipality, State & Zip Code Robinson, IL 62454		Municipality, State & Zip Code Findlay, OH 45840		
	Telephone Number 618-544-2121		Telephone Number 419-421-4527		
	Location of Facility Quarter Section Township Range		Municipality Township Robinson Robinson		
	Street Address Route 33		County Book Number Crawford		
	Property Identification Number		Parcel Number Part of 54-34-1-21		
	Sec. B MANUFACTURING OPERATIONS	Nature of Operations Conducted at the Above Location Petroleum Refining Platformer Vent Gas Scrubber			
Water Pollution Control Construction Permit No.		Date Issued			
NPDES PERMIT No.		Date Issued Expiration Date			
Air Pollution Control Construction Permit No. 04060068		Date Issued August 31, 2004			
Air Pollution Control Operating Permit No. 96010007 (Title V Permit)		Date Issued November 24, 2003			
Sec. C MANUFACTURING PROCESS	Describe Unit Process See Attached			RECEIVED FEB 01 2006 IEPA - DAPC - SPFLD	
	Materials Used in Process See Attached				
Sec. D POLLUTION CONTROL FACILITY DESCRIPTION	Describe Pollution Abatement Control Facility See Attached				

Attachment
Application for Certification (Property Tax) Pollution Control Facility
Marathon Petroleum Company LLC

Project: Platformer Vent Gas Scrubber

Section C - Manufacturing Process

Describe Unit Process:

Organic chloride is injected for the regeneration of the Platformer Unit catalyst. By-products of regeneration are hydrochloric acid (HCl) and chlorine gas (Cl₂). The vent gas scrubber is designed to remove greater than 99.9% of the HCl and Cl₂ in the vent gas stream.

Materials Used in Process:

- Regenerator off-gas
- Sodium hydroxide

Section D – Pollution Control Facility Description

Describe Pollution Abatement Control Facility:

Refinery MACT II federal regulations require the chloride content of regeneration vent gas from continuous catalyst regeneration (CCR) be reduced to less than 10 ppm or a 97 wt% reduction. To achieve this required reduction of HCl and Cl₂ from the vent gas stream it was necessary to install a two-stage caustic scrubbing system.

The Platformer Unit CCR process produces small amounts of HCl and Cl₂ byproducts which are contaminants that are regulated by the MACT II federal regulations. To reduce these contaminants to an acceptable level, a wet scrubber using caustic solution is required to control emissions on the vent to the atmosphere. This is a two-stage process with the first stage being an eductor that mixes dilute caustic with the CCR vent gas. The combined stream of CCR vent gas and caustic solution then flows to the second stage, the CCR Vent Gas Tower. The two-phase combined stream enters the tower below the packed section and separates into a vent gas stream and a liquid caustic solution stream. The vent gas passes upward through a shower of caustic solution and a packed bed section that is washed with caustic solution liquid flowing downward through the packing. The circulating caustic solution supply to the tower is fed into the tower at two locations. The majority flows through a distributor located above the packed bed section, and the remainder flows through a spray nozzle located below the packed bed. Spent caustic solution is removed using a slip stream to the sewer. This two-stage vent gas scrubber process has been successful in reducing the HCl and Cl₂ content from between 500 - 1000 ppm to less than 1 ppm.

The new caustic scrubber system is designed to have a positive impact on the environment as it removes inorganic hazardous air pollutants.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 – (217) 782-2113

ROD R. BLAGOJEVICH, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

Memorandum

Technical Recommendation for Tax Certification Approval

Date: December 04, 2006

To: Robb Layman

From: Don Sutton

Subject: Marathon Petroleum Company LLC TC-06-02-01B

This Agency received a request on February 01, 2006 from Marathon Petroleum Company LLC for an Illinois EPA recommendation regarding tax certification of air pollution control facilities pursuant to 35 Ill. Adm. Code 125.204. I offer the following recommendation.

The air pollution control facilities in this request include the following:

Platform Vent Gas Scrubber whose primary purpose is to control HCL emissions on the vent to the atmosphere. HCL is an acid gas and is regulated as a hazardous air pollutant. Because the primary purpose of this unit is to reduce or eliminate air pollution, it is certified as a pollution control facility.

This facility is located at Route 33, Robinson, Crawford County
The property identification number is Part of 54-34-1-21

Based on the information included in this submittal, it is my engineering judgement that the proposed facility may be considered "Pollution Control Facilities" under 35 IAC 125.200(a), with the primary purpose of eliminating, preventing, or reducing air pollution, or as otherwise provided in this section, and therefore eligible for tax certification from the Illinois Pollution Control Board. Therefore, it is my recommendation that the Board issue the requested tax Certification for this facility.

— *Exhibit B* —