INTERMEDIATE STATE
PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth herein.

Intermediate Operating Permit Number: OP2017-099
Expiration Date: AUG 06 2023
Installation ID: 111-0019
Project Number: 2014-10-060

Installation Name and Address: Ayers Oil Company
610 N. 4th Street
Canton, MO 63435
Lewis County

Parent Company's Name and Address: N/A

Installation Description:
Ayers oil company operates a bulk petroleum terminal in Canton, Missouri, with an aggregate storage capacity of 17,452,448 gallons. Process equipment includes fixed roof tanks, internal floating roof tanks, and truck loading racks. Volatile organic compound (VOC) emissions result from bulk storage and the transfer, loading & unloading of gasoline, diesel fuel, ethyl alcohol, biodiesel, and natural gasoline. The installation has voluntarily limited volatile organic compound (VOC) emissions to remain below the major source threshold.

Prepared by: David Buttig PE
Operating Permit Unit

Director or Designee
Department of Natural Resources
AUG 06 2018
Effective Date
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## I. Installation Equipment Listing

### EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and identified as having unit-specific emission limitations.

<table>
<thead>
<tr>
<th>Emission Point No.</th>
<th>Description of Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-02</td>
<td>Tank #2: 0.700 Million Gallon Internal Floating Roof Tank (Gasoline)</td>
</tr>
<tr>
<td>EP-03</td>
<td>Tank #3: 0.568 Million Gallon Vertical Fixed Roof Tank (Diesel)</td>
</tr>
<tr>
<td>EP-04</td>
<td>Tank #4: 0.024 Million Gallon Horizontal Tank (Denatured Ethyl Alcohol)</td>
</tr>
<tr>
<td>EP-05</td>
<td>Tank #5: 0.024 Million Gallon Horizontal Tank (Diesel Slop)</td>
</tr>
<tr>
<td>EP-06</td>
<td>Tank #6: 0.034 Million Gallon Horizontal Tank (Denatured Ethyl Alcohol)</td>
</tr>
<tr>
<td>EP-07</td>
<td>Tank #7: 0.019 Million Gallon Horizontal Tank (Gasoline Slop)</td>
</tr>
<tr>
<td>EP-08</td>
<td>Tank #8: 0.015 Million Gallon Horizontal Tank (Bio Diesel)</td>
</tr>
<tr>
<td>EP-09</td>
<td>Tank #9: 0.010 Million Gallon Horizontal Tank (Bio Diesel Slop)</td>
</tr>
<tr>
<td>EP-10</td>
<td>Tank #10: 1.250 Million Gallon Internal Floating Roof Tank (Gasoline)</td>
</tr>
<tr>
<td>EP-11</td>
<td>Tank #11: 0.010 Million Gallon Horizontal Tank (Gasoline)</td>
</tr>
<tr>
<td>EP-12</td>
<td>Tank #12: 1.350 Million Gallon Internal Floating Roof Tank (Gasoline)</td>
</tr>
<tr>
<td>EP-14</td>
<td>Tank #14: 1.01 Million Gallon Vertical Fixed Roof Tank (Diesel)</td>
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<tr>
<td>EP-15</td>
<td>Tank #15: 2.262 Million Gallon Internal Floating Roof Tank (Natural Gasoline)</td>
</tr>
<tr>
<td>EP-16</td>
<td>Tank #16: 4.947 Million Gallon Internal Floating Roof Tank (Diesel)</td>
</tr>
<tr>
<td>EP-17</td>
<td>Tank #17: 4.991 Million Gallon Internal Floating Roof Tank (Gasoline)</td>
</tr>
<tr>
<td>EP-18</td>
<td>Truck Loading Rack – Big Loading Rack (Diesel and Gasoline)</td>
</tr>
<tr>
<td>EP-20</td>
<td>Truck Loading Rack – Small Loading Rack (Diesel and Gasoline)</td>
</tr>
<tr>
<td>EP-21</td>
<td>Bottom Loading from Tank #15 (Gasoline)</td>
</tr>
<tr>
<td>EP-22</td>
<td>Diesel-Fueled Water Heater: 0.42 MMBtu/hr</td>
</tr>
<tr>
<td>N/A</td>
<td>Tank #20: 300 Gallon Horizontal Gasoline/Diesel Slop Tank</td>
</tr>
</tbody>
</table>

### EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

The following list provides a description of the equipment, which does not have unit specific limitations at the time of permit issuance.

Description of Emission Unit

- Tank #18: 300 Gallon Horizontal Diesel Additive Tank
- Tank #19: 1,000 Gallon Horizontal Diesel Additive Tank
- Facility-Wide Piping, Valves, Flanges, Fittings, Pumps, etc. (EP-23)
II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations.

PERMIT CONDITION PW001
10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

**Emission Limitations:**
1) The permittee shall discharge less than 100 tons of total volatile organic compound pollutants (VOC) into the atmosphere from the entire installation during any consecutive 12-month period.
2) The permittee shall discharge less than 10 tons of any individual hazardous air pollutant (HAP) and less than 25 tons of hazardous air pollutants (HAPs) in aggregate into the atmosphere from the entire installation during any consecutive 12-month period.

**Monitoring/Recordkeeping:**
1) The permittee shall maintain accurate records of the type, volume, and period of storage for each product stored in the facility tanks or handled by the loading racks.
2) The permittee shall maintain accurate records of the number of valves, pump seals, and other fittings, connectors, flanges, and sample points as necessary to accurately calculate fugitive emissions as per EPA 453 / R-95-017 (November 1995) or subsequent revisions.
3) The permittee shall maintain accurate records of the amount of time that each of the above equipment listed in paragraph [3)] holds VOC-containing materials as necessary to accurately calculate fugitive emissions as per EPA 453 / R-95-017 (November 1995) or subsequent revisions. 
   a) In lieu of recording the exact contact time, the permittee may assume a worst-case scenario of 8,760 hours per year in order to calculate the fugitive emissions.
4) The permittee shall calculate monthly VOC emissions associated with all storage, transfer and handling operations at this installation, including fugitive emissions. The permittee shall record all VOC emissions on a monthly basis with a consecutive 12-month total.
5) Attachment B contains a log satisfying these recordkeeping requirements. These logs, or equivalents created by the permittee, must be used to certify compliance with this requirement.
6) Attachment C contains the demonstration satisfying the requirement to emit less than 25 tons HAPs and 10 tons of individual HAPs.
7) The permittee shall maintain these records on site for the most recent 60 months.
8) The permittee shall immediately make such records available to any Department of Natural Resources’ personnel upon request.

**Reporting:**
1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month, if the consecutive 12-month total records show that the source exceeded the limitation of less than 100 tons of VOC emissions.
2) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(A).

PERMIT CONDITION PW002

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations

Emission/Operational Limitations:

1) The permittee shall perform a monthly leak inspection of all equipment in liquid or vapor gasoline service. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. Equipment means each valve, pump, pressure relief device, sampling connection system, open-ended valve or line, and flange or other connector in the gasoline liquid transfer and vapor collection systems. This definition also includes the entire vapor processing system except the exhaust port(s) or stack(s).

2) When a leak is detected, the permittee shall make an initial attempt at repair as soon as practicable, but no later than 5 calendar days after the leak is detected.

3) The permittee shall complete repair or replacement of leaking equipment within 15 calendar days after detection of each leak, except as provided in (4) below.

4) Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The permittee must document the reason(s) why the repair was not feasible and the date each repair was completed and include the event on the semiannual excess emissions report.

5) As an alternative to the monthly leak inspection described in paragraph [1)] of this section, the permittee may implement an instrument leak monitoring program that has been demonstrated to the Director as at least equivalent.

Monitoring/Recordkeeping:

1) The permittee shall prepare and maintain an up-to-date logbook which contains the following information for all equipment in gasoline service:
   a) A list, summary description, or diagram(s) showing the location of all equipment in gasoline service;
   b) All completed and signed leak inspection reports; and
   c) A record of maintenance and repairs.
   d) If the permittee elects to implement an instrument monitoring program to comply with the rule, the logbook shall also contain a full description of the monitoring program.

2) The permittee shall record the following information for each monthly leak inspection:
   a) Date of inspection
   b) The equipment type and identification number;
   c) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).
   d) Each detection of a liquid or vapor leak shall be recorded in the logbook and shall include the leak determination method (i.e., sight, sound, or smell).
   e) If a leak is identified, the permittee must also record the following:
      i) The nature of the leak (i.e., vapor or liquid)
      ii) The date of each attempt to repair the leak
      iii) Repair methods applied in each attempt to repair the leak;
iv) “Repair delayed” and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak;

v) The expected date of successful repair of the leak if the leak is not repaired within 15 days; and

vi) The date of successful repair of the leak.

f) The name and signature of the person completing the inspection.

3) An authorized representative of the permittee shall sign the inspection record at the completion of each inspection.

4) Attachment F (Leak Inspection Log Sheet) and Attachment A (Maintenance and Repair Log) contain logs satisfying these recordkeeping requirements. These logs, or equivalent(s) created by the permittee, must be used to certify compliance with this requirement.

5) The permittee shall maintain these records on site for the most recent 60 months.

6) The permittee shall immediately make such records available to any Department of Natural Resources’ personnel upon request.

**Reporting:**

1) The permittee shall submit a semiannual excess emissions report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 30 days following the end of the 6-month period containing the following information:

   a) The number of equipment leaks not repaired within 15 days after detection.

   b) For each occurrence of an equipment leak for which no repair attempt was made within 5 days or for which repair was not completed within 15 days after detection:

      i) The date on which the leak was detected;

      ii) The date of each attempt to repair the leak;

      iii) The reasons for the delay of repair; and

      iv) The date of successful repair.

2) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(A).
III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

**PERMIT CONDITION 1**

10 CSR 10-6.070 New Source Performance Regulations


<table>
<thead>
<tr>
<th>EIQ Reference #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-17</td>
<td>Tank #17: 4.991 Million Gallon Internal Floating Roof Tank; Installed 1976</td>
</tr>
</tbody>
</table>

**Emission/Operational Limitations:**

1) The permittee shall not store petroleum liquid with a true vapor pressure of greater than 11.1 psia in EP-17 and EP-16 (Tanks #17 and #16) unless the tank is equipped with a vapor recovery system or its equivalent. [§60.112(a)(2)]

**Monitoring/Recordkeeping:**

1) The permittee shall maintain records of the petroleum liquid stored in EP-17 and EP-16 (Tanks #17 and #16) using the log shown in Attachment D-1 or an equivalent created by the permittee. These records shall contain at least the following information. [§60.113(a)]
   a) The name of each petroleum liquid stored;
   b) The period that each petroleum liquid was stored in the tank; and
   c) If Tank #17 or Tank #16 is used to store gasoline with a RVP of 13 or higher, the actual maximum temperature of the tank contents on any date when the maximum daily temperature exceeds 85 degrees Fahrenheit (°F).

2) The permittee shall maintain the internal floating roof on Tanks #17 and #16 in good operating condition and keep records of all maintenance, repairs, and tests performed on the tank using the log shown in Attachment A or an equivalent created by the permittee.

3) All records shall be maintained for a minimum of five years.

4) These records shall be made available immediately for inspection to the Department of Natural Resources’ personnel upon request.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10 CSR 10-6.065(5)(A).
PERMIT CONDITION 2
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR 63 Subpart BBBBBBB – National Emission Standards for Hazardous Air Pollutants for
Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

Internal Floating Roof Petroleum Storage Tanks with greater than or equal to 75 cubic meters storage
capacity

<table>
<thead>
<tr>
<th>EIQ Reference #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-02</td>
<td>Tank #2: 0.700 Million Gallon Internal Floating Roof Tank; Installed 1976</td>
</tr>
<tr>
<td>EP-10</td>
<td>Tank #10: 1.250 Million Gallon Internal Floating Roof Tank; Installed 1958</td>
</tr>
<tr>
<td>EP-15</td>
<td>Tank #15: 2.262 Million Gallon Internal Floating Roof Tank; Installed 1958</td>
</tr>
<tr>
<td>EP-17</td>
<td>Tank #17: 4.991 Million Gallon Internal Floating Roof Tank; Installed 1976</td>
</tr>
</tbody>
</table>

Emission/Operational Limitations:
1) The permittee shall equip each internal floating roof gasoline storage tank so as to meet the applicable requirements of 40 CFR 60.112b(a)(1), i.e. a fixed roof in combination with an internal floating roof which meets the following specifications, except for the secondary seal requirements under 40 CFR 60.112b(a)(1)(ii)(B) and the requirements in 40 CFR 60.112b(a)(1)(iv) through (ix): [Table 1 to Subpart BBBBBB of Part 63; Item 2.(b)]
   a) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. [§60.112b(a)(1)(i)]
   b) Each internal floating roof shall be equipped with 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)]
      1. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank. [§60.112b(a)(1)(ii)(A)]
      2. A mechanical shoe seal. A mechanical shoe seal is a 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. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof. [§60.112b(a)(1)(ii)(C)]
   c) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface. [§60.112b(a)(1)(iii)]
2) If the gasoline storage tank is subject to, and complies with, the control requirements of 40 CFR Part 60, subpart Kb of this chapter, the storage tank will be deemed in compliance with the permit condition.
**Monitoring/Recordkeeping Requirements:**

1) The permittee shall perform the following inspections as described in 40 CFR 60.113b(a) for each internal floating roof tank that will comply with 40 CFR 63 Subpart BBBBBB using the methods described in 40 CFR 60 Subpart Kb. After installing the equipment required to meet 40 CFR 60.112b(a)(1), the permittee shall: [§60.113b(a)]

   a) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with gasoline. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage vessel. [§60.113b(a)(1)]

   b) For Vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the gasoline inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Missouri Department of Natural Resources, Air Pollution Control Program in the inspection report required §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. [§60.113b(a)(2)]

   c) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in §60.113b(a)(2). [§60.113b(a)(4)]

2) The permittee shall notify the Missouri Department of Natural Resources, Air Pollution Control Program in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by §113b(a)(1) and (a)(4), to afford the Department of Natural Resources the opportunity to have an observer present. If the inspection required by §113b(a)(4), is not planned and the permittee could not have known about the inspection 30 days in advance or refilling the tank, the permittee shall notify the Missouri Department of Natural Resources, Air Pollution Control Program at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Missouri Department of Natural Resources, Air Pollution Control Program at least 7 days prior to the refilling. [§60.113b(a)(5)]

3) The permittee shall keep a record of each inspection performed as required above. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the
vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

4) The permittee shall maintain records of the petroleum liquids stored in EP-02, EP-10, EP-15, EP-16, and EP-17 using the log shown in Attachment D-2 or an equivalent created by the permittee. These records shall contain at least the following information:
   a) The name of each petroleum liquid stored; and
   b) The storage period for each petroleum liquid that was stored in the tank.

5) All records shall be maintained for a minimum of five years or for the period specified in the applicable attachment, whichever is longer.

6) These records shall be made available immediately for inspection to the Department of Natural Resources’ personnel upon request.

**Reporting Requirements:**

1) The permittee shall submit the following reports as described in 40 CFR 60.115b(a) for each internal floating roof tank that will comply with 40 CFR 63 Subpart BBBBBB using the methods described in 40 CFR 60 Subpart Kb:
   a) If any of the conditions described in 40 CFR 60.113b(a)(2), are detected during the annual visual inspection required, the permittee shall submit a report to the Missouri Department of Natural Resources, Air Pollution Control Program, Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 within 30 days of the inspection. The report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

2) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(A).

<table>
<thead>
<tr>
<th>PERMIT CONDITION 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)</td>
</tr>
<tr>
<td>Fixed Roof Storage Tanks with greater than or equal to 75 cubic meters storage capacity</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>EIQ Reference #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-03</td>
<td>Tank #3: 0.568 Million Gallon Vertical Fixed Roof Tank; Non-gasoline storage Tank; Installed 1948</td>
</tr>
<tr>
<td>EP-04</td>
<td>Tank #4: 0.024 Million Gallon Horizontal Fixed Roof Tank; Non-gasoline storage Tank; Installed 1958</td>
</tr>
<tr>
<td>EP-05</td>
<td>Tank #5: 0.024 Million Gallon Horizontal Fixed Roof Tank; Non-gasoline storage tank; Installed 1958</td>
</tr>
<tr>
<td>EP-06</td>
<td>Tank #6: 0.034 Million Gallon Horizontal Fixed Roof Tank; Non-gasoline storage tank; Installed 1958</td>
</tr>
<tr>
<td>EP-14</td>
<td>Tank #14: 1.000 Million Gallon Vertical Fixed Roof Tank; Non-gasoline storage tank; Installed 1964</td>
</tr>
</tbody>
</table>

**Emission/Operational Limitations:**

1) The permittee shall not use any non-gasoline storage tank to store gasoline without notifying the Missouri Department of Natural Resources in advance of the changes and unless the requirements of 40 CFR Part 63 Subpart BBBBBBBB are complied with.
2) The permittee shall maintain all openings on each non-gasoline storage tank in a closed position when not in use.

**Monitoring/Recordkeeping Requirements:**
1) The permittee shall maintain documentation of each tank for which a written notification is submitted, including the effective date of the restriction.
2) The permittee shall maintain records of the petroleum liquid stored in any non-gasoline storage tank in using the log shown in Attachment D-2 or an equivalent created by the permittee. These records shall contain at least the following information:
   a) The name of each petroleum liquid stored; and
   b) The period that each petroleum liquid was stored in the tank.
3) These records shall be made available immediately for inspection to the Department of Natural Resources’ personnel upon request.
4) All records shall be maintained for five years.

**Reporting Requirements:**
1) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(A).

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**PERMIT CONDITION 4**

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations

<table>
<thead>
<tr>
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<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-07</td>
<td>Tank #7: 0.019 Million Gallon Horizontal Fixed Roof Tank; Installed 1958</td>
</tr>
<tr>
<td>EP-08</td>
<td>Tank #8: 0.015 Million Gallon Horizontal Fixed Roof Tank; Installed 1958</td>
</tr>
<tr>
<td>EP-09</td>
<td>Tank #9: 0.010 Million Gallon Horizontal Fixed Roof Tank; Installed 1958</td>
</tr>
<tr>
<td>EP-11</td>
<td>Tank #11: 0.010 Million Gallon Horizontal Fixed Roof Tank; Installed 1958</td>
</tr>
<tr>
<td>N/A</td>
<td>Tank #20: 300 Gallon Horizontal Fixed Roof Tank</td>
</tr>
</tbody>
</table>

**Emission/Operational Limitations:**
1) The permittee shall equip each tank that will be used for gasoline storage (Tanks #7, #8, #9, #11 and #20) with a fixed roof that is mounted to the storage tank in a stationary manner.
2) The permittee shall maintain all openings in a closed position when not in use. [Table 1 to Subpart BBBBBB of Part 63; Item 1.(i)]

**Monitoring/Recordkeeping Requirements:**
1) The permittee shall maintain records of the petroleum liquid stored in Tanks #7, #8, #9, #11, and #20 using the log shown in Attachment D-2 or an equivalent created by the permittee. These records shall contain at least the following information:
   a) The name of each petroleum liquid stored; and
   b) The storage period for each petroleum liquid that was stored in the tank.
2) The permittee shall maintain Tanks #7, #8, #9, #11, and #20 in good operating condition and keep records of all maintenance, repairs and tests performed on each tank using the log shown in Attachment A or an equivalent created by the permittee.

3) All records shall be maintained for a minimum of five years.

4) All records shall be made available immediately for inspection to the Department of Natural Resources’ personnel upon request.

**Reporting Requirements:**

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(A).

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**PERMIT CONDITION 5**

10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

<table>
<thead>
<tr>
<th>Description</th>
<th>Manufacturer/Model #</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-18 Truck Loading Rack – Big Loading Rack</td>
<td>Unknown (1958)</td>
</tr>
</tbody>
</table>

**Emission Limitation:**

1) The permittee shall limit total gasoline throughput of EP-18, EP-20, and EP-21 to less than 250,000 gallons per day.

**Monitoring/Recordkeeping:**

1) The permittee shall maintain accurate records of the total daily gasoline throughput handled by each of the loading racks. Throughput, in gallons per day, shall be calculated by summing the current day’s throughput, plus the throughput for the previous 364 days, and then dividing that sum by 365.

2) Attachment E contains a log satisfying these recordkeeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.

3) The permittee shall maintain these records on site for a minimum of 5 years.

4) All records shall be made available immediately for inspection to the Department of Natural Resources’ personnel upon request.

**Reporting:**

1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month, if the records show that the total gasoline throughput through the loading racks was greater than or equal to 250,000 gallons per day on any day during the preceding month.

2) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(A).
PERMIT CONDITION 6

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations

<table>
<thead>
<tr>
<th>EIQ Reference #</th>
<th>Description</th>
<th>Manufacturer/Model #</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-18</td>
<td>Truck Loading Rack – Big Loading Rack</td>
<td>Unknown (1958)</td>
</tr>
</tbody>
</table>

Emission/Operational Limitations:
1) The permittee must use submerged filling whenever using the loading racks to load cargo tanks with gasoline. The submerged fill pipe must be no more than 6-inches from the bottom of the cargo tank. [Table 2 to Subpart BBBB B of Part 63: Item 2.A]

Monitoring/Recordkeeping:
1) The permittee shall maintain records of the gasoline loaded by the loading systems using the log shown in Attachment E or an equivalent created by the permittee.
2) The permittee shall maintain the loading systems in good operating condition and keep records of all maintenance, repairs and tests performed on each loading system using the log shown in Attachment A or an equivalent created by the permittee.
3) All records shall be maintained for a minimum of five years.
4) These records shall be made available immediately for inspection to the Department of Natural Resources’ personnel upon request. Records documenting gasoline throughput must be made available within 24-hours of receiving a request from the Department of Natural Resources. [Table 2 to Subpart BBBB B of Part 63: Item 2.B]

Reporting:
The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10 CSR 10-6.065(5)(A).

PERMIT CONDITION 7

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

<table>
<thead>
<tr>
<th>EIQ Reference #</th>
<th>Description</th>
<th>Manufacturer/Model #</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-22</td>
<td>Diesel-Fueled Water Heater: 0.42 MMBtu/hr; Installed 1964</td>
<td>R.W. Beckett Corporation</td>
</tr>
</tbody>
</table>

Emission Limitation:
1. The permittee shall not cause or permit to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 40%.
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty (60) minutes air contaminants with an opacity up to 60%.
Monitoring/Record Keeping:
None-See Statement of Basis-Other Regulatory Determinations.

Reporting:
The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(A).

PERMIT CONDITION 8
10 CSR 10-6.261 Control of Sulfur Dioxide Emissions

<table>
<thead>
<tr>
<th>EIQ Reference #</th>
<th>Description</th>
<th>Manufacturer/Model #</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-22</td>
<td>Diesel-Fueled Water Heater: 0.42 MMBtu/hr; Installed 1964</td>
<td>R.W. Beckett Corporation</td>
</tr>
</tbody>
</table>

Fuel Requirements:
1) The permittee shall limit the distillate fuel oil sulfur content to 35,249 ppm. [10 CSR 10-6.261(3)(C)]

Compliance Demonstration/Recordkeeping:
1) The permittee shall maintain fuel delivery records indicating the sulfur content of the fuel meets the requirements of this permit condition. These records shall include:
   a) The name, address, and contact information of the fuel supplier;
   b) The type of fuel;
   c) The sulfur content or maximum sulfur content expressed in ppm sulfur; and
   d) The heating value of the fuel.
2) The permittee shall maintain records of any equipment malfunctions, using Attachment A or an equivalent form generated by the permittee.
3) All required reports and records must be retained on-site for a minimum of five (5) years and made available within five (5) business days upon written or electronic request by the director. [10 CSR 10-6.261(4)(F)]
4) The permittee must furnish the director all data necessary to determine compliance status. [10 CSR 10-6.261(4)(G)]

Reporting:
1) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(A).
2) The permittee shall report to the Air Pollution Control Program, Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The following are only excerpts from the regulation or code, and are provided for summary purposes only.

<table>
<thead>
<tr>
<th>10 CSR 10-6.045 Open Burning Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.</td>
</tr>
<tr>
<td>2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:</td>
</tr>
<tr>
<td>a) Name and location of installation;</td>
</tr>
<tr>
<td>b) Name and telephone number of person responsible for the installation;</td>
</tr>
<tr>
<td>c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.</td>
</tr>
<tr>
<td>d) Identity of the equipment causing the excess emissions;</td>
</tr>
<tr>
<td>e) Time and duration of the period of excess emissions;</td>
</tr>
<tr>
<td>f) Cause of the excess emissions;</td>
</tr>
<tr>
<td>g) Air pollutants involved;</td>
</tr>
<tr>
<td>h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;</td>
</tr>
<tr>
<td>i) Measures taken to mitigate the extent and duration of the excess emissions; and</td>
</tr>
<tr>
<td>j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.</td>
</tr>
<tr>
<td>2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.</td>
</tr>
<tr>
<td>3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.</td>
</tr>
</tbody>
</table>
4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.

5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

**10 CSR 10-6.060 Construction Permits Required**

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

**10 CSR 10-6.065 Operating Permits**

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.


The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.

**10 CSR 10-6.110 Reporting of Emission Data, Emission Fees and Process Information**

1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.

2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.

3) The permittee shall submit a full EIQ for the 2017 and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.

4) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.

**10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential**

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.
10 CSR 10-6.150 Circumvention
The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.165 Restriction of Emission of Odors
This is a State Only permit requirement.
No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin
Emission Limitation:
1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
2) The permittee shall not cause or allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
   a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
   b) Paving or frequent cleaning of roads, driveways and parking lots;
   c) Application of dust-free surfaces;
   d) Application of water; and
   e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants
1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.
10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

This is a State Only permit requirement.
The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees.

10 CSR 10-6.280 Compliance Monitoring Usage

1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
   c) Any other monitoring methods approved by the director.

2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
   c) Compliance test methods specified in the rule cited as the authority for the emission limitations.

3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
   a) Applicable monitoring or testing methods, cited in:
      i) 10 CSR 10-6.030, “Sampling Methods for Air Pollution Sources”;
      ii) 10 CSR 10-6.040, “Reference Methods”;
      iii) 10 CSR 10-6.070, “New Source Performance Standards”;
      iv) 10 CSR 10-6.080, “Emission Standards for Hazardous Air Pollutants”; or
   b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)

1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
   a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
   b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.

2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
   a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
   b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
   c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
   d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
   e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
   f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.

3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. Federal Only - 40 CFR Part 82.
V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.065, §(5)(C)1, §(6)(C)1.B, §(5)(E)2.C Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements

1) Record Keeping
   a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
   b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.

2) Reporting
   a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
   b) The permittee shall submit a report of all required monitoring by:
      i) April 1st for monitoring which covers the January through December time period.
      ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
   c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
   d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
      i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit.

e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.

f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

10 CSR 10-6.065(5)(C)1.A General Requirements

1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.

2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.

3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.

5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.

6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

1) Loading Racks: The installation may interchange the materials pumped through the loading racks among the products typically handled, including gasoline, diesel, ethyl alcohol, biodiesel, and natural gasoline.

2) Storage Tanks: The installation may interchange the materials stored in the tanks among the products typically handled, as long as the tank meets the regulatory requirements necessary to store such products.
1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.

2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation’s right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
   a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
   b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
   c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
   d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.

3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
   a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
   b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.

4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
   a) The identification of each term or condition of the permit that is the basis of the certification;
   b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
   c) Whether compliance was continuous or intermittent;
   d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
   e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions
1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7 shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
b) That the installation was being operated properly,
c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

### 10 CSR 10-6.065(5)(C)5 Off-Permit Changes

1) Except as noted below, the permittee may make any change in its permitted installation’s operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
   a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
   b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
   c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

### 10 CSR 10-6.020(2)(R)34 Responsible Official

The application utilized in the preparation of this permit was signed by Steve Ayers, President. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.
Reopening-Permit for Cause

This permit may be reopened for cause if:
1) The Missouri Department of Natural Resources (MoDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
   a) The permit has a remaining term of less than three years;
   b) The effective date of the requirement is later than the date on which the permit is due to expire;
   or
   c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
3) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

Attachments

Attachments follow.
Attachment A
Inspection/Maintenance/Repair/Malfunction Log

Emission Unit # or CVM # ________________________________

<table>
<thead>
<tr>
<th>Date/Time</th>
<th>Inspection/Maintenance Activities</th>
<th>Malfunction</th>
<th>Impact</th>
<th>Duration</th>
<th>Cause</th>
<th>Action</th>
<th>Initials</th>
</tr>
</thead>
<tbody>
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</tbody>
</table>
# Attachment B

Volatile Organic Compound (VOC) Emissions Log

<table>
<thead>
<tr>
<th>Month/Year</th>
<th>Equipment Name/(EP##)</th>
<th>Material Handled</th>
<th>Amount (gallons)</th>
<th>VOC Emissions (tons)</th>
<th>12-Month Rolling Total (tons)</th>
</tr>
</thead>
<tbody>
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</tbody>
</table>

**NOTE:** All Facility VOC emissions, including fugitive emissions associated with valves, pump seals, and other fittings, connectors, flanges, and sample points, must be counted in the totals. List the emission factor(s) based on EPA 453/R-95-017 under material handled and the total hours that the material was in contact with the applicable item(s) under the amount.
**Attachment C**

Hazardous Air Pollutant (HAPs) Emissions Demonstration

The intermediate permit application has requested a voluntary permit condition for facility-wide VOC emissions to be <100 tons per year. As a worst-case scenario, it is assumed for these HAP calculations that the 100-ton VOC emissions are from the gasoline since gasoline has the most amount of HAPs compared to any other products stored at the facility. The following table provides the HAPs calculations based on gasoline MSDS from PREMCOR.

<table>
<thead>
<tr>
<th>Component</th>
<th>Weight Fraction in Gasoline</th>
<th>Molecular Weight</th>
<th>Mole Fraction (wt fraction x MW of Component)</th>
<th>Vapor Pressure (psi)</th>
<th>Partial Pressure (lbs) (=100 tons x 2000 lbs/ton /gasoline vapor partial pressure)</th>
<th>Components Emissions (lbs) (=100 tons x 2000 lbs/ton /gasoline vapor partial pressure)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hexane</td>
<td>0.01</td>
<td>86.17</td>
<td>0.01067657</td>
<td>1.84</td>
<td>0.019644888</td>
<td>790.19</td>
</tr>
<tr>
<td>Benzene</td>
<td>0.01</td>
<td>78.11</td>
<td>0.011778261</td>
<td>1.2</td>
<td>0.014133914</td>
<td>568.52</td>
</tr>
<tr>
<td>Toluene</td>
<td>0.055</td>
<td>92.13</td>
<td>0.054922392</td>
<td>0.38</td>
<td>0.020870509</td>
<td>839.49</td>
</tr>
<tr>
<td>Xylenes</td>
<td>0.05</td>
<td>106.17</td>
<td>0.04332674</td>
<td>0.12</td>
<td>0.005199209</td>
<td>209.13</td>
</tr>
<tr>
<td>Ethyl benzene</td>
<td>0.01</td>
<td>106.17</td>
<td>0.008665348</td>
<td>0.137</td>
<td>0.001187153</td>
<td>47.75</td>
</tr>
<tr>
<td>2,2,4-Trimethylpentane</td>
<td>0.175</td>
<td>114</td>
<td>0.14122807</td>
<td>0.627</td>
<td>0.08855</td>
<td>3561.8</td>
</tr>
</tbody>
</table>

| Total HAPs=   |                             |                  |                                               |                      |                                                                                  | 6016.88                                                                           |

Since the worst-case total HAPs emissions (at VOC emissions of 100 tons/year) are about 3 tons per year, the 25 ton and 10 ton HAP limitations are satisfied.
Attachment D-1
Petroleum Product Storage Log for Tanks #16 and #17

This recordkeeping sheet or similar may be used to show compliance with 40 CFR 60.113.

1. Record the product and the applicable dates for each petroleum product stored in Tank #16 and Tank #17.
2. Whenever Tank #16 or Tank #17 is used to store Gasoline RVP 13 or higher, record the maximum daily temperature and the maximum liquid storage temperature and actual vapor pressure for each date that the maximum daily ambient temperature exceeds 85°F.

<table>
<thead>
<tr>
<th>Equipment Name/EP##</th>
<th>Petroleum Product Stored</th>
<th>RVP</th>
<th>Begin Date</th>
<th>End Date</th>
<th>2 – Gasoline RVP 13 or Higher Stored</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Maximum Daily Ambient Temp (°F)</td>
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<td>Maximum Daily Storage Temp. (°F)</td>
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<td>True Vapor Pressure (psia)</td>
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</tbody>
</table>
Attachment D-2
Petroleum Product Storage Log

This recordkeeping sheet or one similar created by the permittee may be used to show compliance with 40 CFR 60.113 and 40 CFR Subpart BBBBBB.

1. Record the product stored and the applicable dates for each petroleum product stored.
2. Indicate whether or not this is a gasoline product, subject to 40 CFR Part 60 Subpart K or 40 CFR Part 63 Subpart BBBBBB

<table>
<thead>
<tr>
<th>Equipment Name/(EP-##)</th>
<th>Petroleum Product Stored</th>
<th>Begin Date</th>
<th>End Date</th>
<th>Regulated Gasoline Product? (Yes/No)</th>
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<tbody>
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</table>
Attachment E
Gasoline Throughput and Loading Rack Log

This recordkeeping sheet or similar created by the permittee may be used to show compliance with Permit Conditions 5 and 6 (40 CFR Part 63 Subpart BBBBBB)

1. For each date, record the amount loaded using each loading rack.
2. Calculate the daily gasoline throughput totals. [Sum of the current day’s throughput for the previous 364 days, divided by 365.] Daily throughput may not exceed 250,000 gallons.
3. Confirm that a submerged fill pipe that is no more than 6” from the bottom of the cargo tank was used each time a loading rack is used.

<table>
<thead>
<tr>
<th>Date</th>
<th>Equipment Name/EP-##</th>
<th>1. Amount Loaded (gallons)</th>
<th>2. Daily Throughput (gallons)</th>
<th>3. Submerged Fill Used? (Yes/No)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Truck Loading Rack – Big Loading Rack (EP-18)</td>
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<td></td>
<td>Truck Loading Rack – Small Loading Rack (EP-20)</td>
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<td></td>
<td>Bottom Loading from Tank #15 (EP-21)</td>
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<td>Daily Gasoline Throughout</td>
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<td>Truck Loading Rack – Big Loading Rack (EP-18)</td>
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<td>Truck Loading Rack – Small Loading Rack (EP-20)</td>
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<td>Bottom Loading from Tank #15 (EP-21)</td>
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<td>Daily Gasoline Throughout</td>
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<td>Truck Loading Rack – Big Loading Rack (EP-18)</td>
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<td>Truck Loading Rack – Small Loading Rack (EP-20)</td>
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<td>Bottom Loading from Tank #15 (EP-21)</td>
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<td>Daily Gasoline Throughout</td>
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## Attachment F

**Leak Inspection Log Sheet**

<table>
<thead>
<tr>
<th>Date of Inspection</th>
<th>Equipment Name (Emission Point #)</th>
<th>Leak Detected?</th>
<th>Method of Detection?</th>
<th>Location of Leak</th>
<th>Description of Leak</th>
<th>List each date a repair was attempted</th>
<th>Comments / Reason Repair Was Not Completed Within 15 Days</th>
<th>Date the repair was completed OR the target date</th>
</tr>
</thead>
<tbody>
<tr>
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<td></td>
<td>(None / Liquid / Vapor / Both)</td>
<td>(Sight/Sound/Smell)</td>
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<td>(Sight/Sound/Smell)</td>
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<td>(None / Liquid / Vapor / Both)</td>
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</table>

1. Equipment means each valve, pump, pressure relief device, sampling connection system, open-ended valve or line, and flange or other connector in the gasoline liquid transfer and vapor collection systems. This definition also includes the entire vapor processing system except the exhaust port(s) or stack(s).

2. A full description of the repair(s) made and corrective action taken is to be documented on the Maintenance and Repair Log (Attachment A).

3. Enter the targeted completion date for any repair that has not been completed within 15 days of detection. The date that the repair was finally completed should be documented on the Maintenance and Repair Log (Attachment A).

---

Inspected By

Signature of Owner / Operator
STATEMENT OF BASIS

Voluntary Limitations
In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee’s responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

Installation Description
Ayers Oil Company operates a bulk petroleum terminal in Canton, Missouri, with an aggregate storage capacity of 17,452,448 gallons. Process equipment includes vertical and horizontal fixed roof tanks, internal floating roof tanks, and truck loading racks. Volatile organic compound (VOC) emissions result from bulk storage and the transfer, loading & unloading of gasoline, diesel fuel, ethyl alcohol, biodiesel, and natural gasoline. The installation has voluntarily limited volatile organic compound (VOC) emissions to remain below the major source threshold.

Ayers Oil Company is a named installation in 10 CSR 10-6.020(3)(B); therefore, fugitive emissions count towards major source applicability.

Statement of Basis
No comments were received during the public comment period of November 17, 2017 through December 17, 2017.

Updated Potential to Emit for the Installation

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Potential to Emit (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO</td>
<td>0.067</td>
</tr>
<tr>
<td>HAP (Total)</td>
<td>3.01</td>
</tr>
<tr>
<td>NOx</td>
<td>0.27</td>
</tr>
<tr>
<td>PM10</td>
<td>0.014</td>
</tr>
<tr>
<td>PM2.5</td>
<td>0.011</td>
</tr>
<tr>
<td>SOx</td>
<td>0.96</td>
</tr>
<tr>
<td>VOC</td>
<td>&lt; 100</td>
</tr>
</tbody>
</table>

1 Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.
2 Voluntary limitation has been applied from Permit Condition PW001.
3 The gasoline throughput of EP-18, EP-20, and EP-21 has been limited to less than 250,000 gallons per day.
Reported Air Pollutant Emissions, tons per year

<table>
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<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>Volatile Organic Compounds(VOC)</td>
<td>12.77</td>
<td>12.77</td>
<td>12.77</td>
<td>16.27</td>
<td>16.27</td>
</tr>
<tr>
<td>Hazardous Air Pollutants (HAPs)</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

Permit Reference Documents
These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

1) Intermediate Operating Permit Application, received October 27, 2014;
2) 2016 Emissions Inventory Questionnaire, received March 30, 2017; and
3) U.S. EPA document AP-42, Compilation of Air Pollutant Emission Factors; Volume I, Stationary Point and Area Sources, Fifth Edition; and
4) MDNR’s “Clean Air Act 110(1) Demonstration to Support Amendment to 10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants”, Published February 20, 2014.

Other Air Regulations Determined Not to Apply to the Operating Permit
The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100, Alternate Emission Limits
This rule is not applicable because the installation is in an ozone attainment area.

Removed/Added Emission Units
The following Emission Units have been removed from the facility since the issuance of Operating Permit OP2010-037:

<table>
<thead>
<tr>
<th>Emission Unit #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-01</td>
<td>Tank #1: 0.250 Million Gallon Vertical Fixed Roof Tank</td>
</tr>
</tbody>
</table>

Construction Permit History

No Construction Permits have been issued to Ayers Oil Company

New Source Performance Standards (NSPS) Applicability


1) This rule was determined to be applicable to EP-16 (Tank #16). EP-16 was constructed in 1976, has a capacity of 4,947,000 gallons (greater than 40,000 gallons), and may be used to store petroleum liquids as defined in 40 CFR 60.111(b). EP-16 is therefore subject to the following standards.
a) 40 CFR 60.112(a)(1): EP-16 has an internal floating roof and therefore may be used to store petroleum liquids with a true vapor pressure of not greater than 11.1 psia.

b) 40 CFR 60.112(a)(2): EP-16 does not have a vapor recovery system and therefore may not be used to store petroleum liquids that have a true vapor pressure that is greater than 11.1 psia. Based on AP-42, Table 7.1-2, Gasoline RVP 13 could have a vapor pressure greater than 11.1 psia if the liquid temperature is greater than 87 °F. The installation stated in their letter dated January 03, 2008 that gasoline with an RVP of 13 or higher will not be stored in EP-17 when the liquid temperature is greater than 85 °F. As per Permit Condition 1, the installation will document the petroleum liquid(s) stored in EP-16, along with the period of storage using the Petroleum Product Storage/Loading log shown in Attachment D-1 or an equivalent created by the permittee. If EP-16 is used to store gasoline with a RVP 13 or higher, the installation will also record both the maximum daily ambient temperature and the maximum liquid storage temperature on any date that the maximum ambient temperature exceeds 85 °F.

c) 40 CFR 60.7(a)(1): The installation has submitted a notification letter per the requirement of this section concerning EP-16.

2) This rule was determined to be applicable to EP-17 (Tank #17). EP-17 was constructed in 1976, has a capacity of 4,990,750 gallons (greater than 40,000 gallons), and may be used to store petroleum liquids as defined in 40 CFR 60.111(b). EP-17 is therefore subject to the following standards.

a) 40 CFR 60.112(a)(1): EP-17 has an internal floating roof and therefore may be used to store petroleum liquids with a true vapor pressure of not greater than 11.1 psia.

b) 40 CFR 60.112(a)(2): EP-17 does not have a vapor recovery system and therefore may not be used to store petroleum liquids that have a true vapor pressure that is greater than 11.1 psia. Based on AP-42, Table 7.1-2, Gasoline RVP 13 could have a vapor pressure greater than 11.1 psia if the liquid temperature is greater than 87 °F. The installation stated in their letter dated January 03, 2008 that gasoline with an RVP of 13 or higher will not be stored in EP-17 when the liquid temperature is greater than 85 °F. As per Permit Condition 1, the installation will document the petroleum liquid(s) stored in EP-17, along with the period of storage using the Petroleum Product Storage/Loading log shown in Attachment D-1 or an equivalent created by the permittee. If EP-17 is used to store gasoline with a RVP 13 or higher, the installation will also record both the maximum daily ambient temperature and the maximum liquid storage temperature on any date that the maximum ambient temperature exceeds 85 °F.

c) 40 CFR 60.7(a)(1): The installation has submitted a notification letter per the requirement of this section concerning EP-17.

3) All other existing tanks located at the facility were installed prior to June 11, 1973 and therefore are not subject to this rule.


This rule was determined to not be applicable to the installation because no existing tanks were installed, reconstructed, or modified during the time period covered.

This rule was determined not to be applicable to the installation because no existing tanks have been installed since July 23, 1984. The changes that have been made to these tanks have not met the definition of a modification since no change has resulted in an increase in the amount of pollutants emitted and no new pollutants have been emitted. The changes have also not met the definition of a reconstruction since the cost has been less than 50% of the cost of a replacement.

This regulation has been included in Permit Condition 2 as a compliance method for 40 CFR Part 63 Subpart BBBBBB.

40 CFR Part 60, Subpart XX, *Standards of Performance for Bulk Gasoline Terminals*

This rule was determined not to be applicable to the installation because the three racks included in EP-18, EP-20, and EP-21 (Big Loading Rack, Small Loading Rack, and Bottom Loading Rack from EP-15) were each constructed prior to December 17, 1980. None of the loading racks were determined to have been modified or reconstructed since that date.

**Maximum Achievable Control Technology (MACT) Applicability**


Bulk gasoline terminals which have a total emissions screening factor ($E_T$) calculated to be one (1) or greater or bulk gasoline terminals which are located at a major source of hazardous air pollutants (HAPs) emissions are subject to this subpart. In Permit Condition PW001 the installation has voluntarily limited total hazardous air pollutants (HAPs) to less than 25 tons per consecutive 12-month period and limited individual hazardous air pollutants to less than ten (10) tons per consecutive 12-month period. The ongoing emission tracking required to demonstrate compliance with these voluntary limits (Attachment C) will also be used to demonstrate that the facility remains not subject to this standard as per 40 CFR 63.420(a)(2).

40 CFR Part 63, Subpart OO – *National Emission Standards for Tanks – Level 1*

The provisions of this subpart apply only if specifically referenced by another applicable rule. This rule was determined not to apply to the installation because no applicable subpart of 40 CFR 60, 61, or 63 references its use.

40 CFR Part 63, Subpart TT – *National Emission Standards for Equipment Leaks – Control Level 1*

The provisions of this subpart apply only if specifically referenced by another applicable rule. This rule was determined not to apply to the installation because no applicable subpart of 40 CFR 60, 61, or 63 references its use.

40 CFR Part 63, Subpart UU – *National Emission Standards for Equipment Leaks – Control Level 2*

The provisions of this subpart apply only if specifically referenced by another applicable rule. This rule was determined not to apply to the installation because no applicable subpart of 40 CFR 60, 61, or 63 references its use.
40 CFR Part 63, Subpart WW – National Emissions Standards for Storage Vessels (Tanks) – Control Level 2

The provisions of this subpart apply only if specifically referenced by another applicable rule. This rule was determined not to apply to the installation because no applicable subpart of 40 CFR 60, 61, or 63 references its use.


This rule was determined to be applicable to the installation because Ayers Oil is a bulk gasoline terminal which is not subject to the control requirements of 40 CFR Part 63, Subpart R. Gasoline storage tanks, gasoline loading racks, vapor collection-equipped gasoline cargo tanks, and equipment components in vapor or liquid gasoline service are subject to the requirements of this rule.

1) Equipment in gasoline service is subject to the leak detection provisions of 40 CFR 63.11089. The installation must implement a monthly equipment leak inspection and ensure that any leaking equipment components are repaired within a specified time period. The rule defines equipment as “each valve, pump, pressure relief device, sampling connection system, open ended valve or line, and flange or other connector in the gasoline liquid transfer and vapor collection systems. This definition also includes the entire vapor processing system except the exhaust port(s) or stack(s).” These requirements are included as a plantwide emission limitation for the equipment in gasoline service, Permit Condition PW002.

2) Storage tanks with an internal floating roof that are in gasoline service are subject to the 40 CFR Part 63 Subpart BBBBBB contained in Permit Condition 2. The permittee has decided to comply with the control requirements of 40 CFR Part 60 Subpart Kb.

3) The storage tanks with fixed roofs in gasoline service are subject to 40 CFR Part 63 Subpart BBBBBB contained in Permit Condition 4.

4) Loading racks in gasoline service are subject to the control and management provisions of 40 CFR 63.11088. The installation has established a voluntary limitation in Permit Condition 5 that limits the total throughput from all three loading racks to less than 250,000 gallons per day. By establishing the voluntary limit on throughput, the installation’s loading racks are in category 2. These loading racks are therefore subject to the requirements of option 2 in Table 2 to Subpart BBBBBB of Part 63. Gallons per day is calculated by summing the current day’s throughput, plus the throughput for the previous 364 days, and then dividing that sum by 365.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.
40 CFR Part 61 Subpart J – *National Emission Standard for Equipment Leaks (Fugitive Emission Sources) of Benzene*

The provisions of this subpart apply to equipment such as pumps, compressors, valves, lines, etc. that operate in benzene service. The gasoline, diesel fuel, ethyl alcohol, biodiesel, and natural gasoline products stored and handled by the installation all contain less than 10% by weight of benzene. Therefore, the equipment at the installation is not considered to be in benzene service as defined in 40 CFR 61.111 and the rule is not applicable to the installation.

40 CFR Part 61, Subpart V – *National Emission Standard for Equipment Leaks (Fugitive Emission Sources)*

The provisions of this subpart apply to equipment such as pumps, compressors, valves, lines, etc. that operate in volatile hazardous air pollutant (VHAP) service. The VHAPs defined by this rule are benzene and vinyl chloride. The gasoline, diesel fuel, ethyl alcohol, biodiesel, and natural gasoline products stored and handled by the installation all contain less than ten percent (10%) by weight of benzene and do not contain vinyl chloride. Therefore, the equipment at the installation is not considered to be in VHAP service as defined by 40 CFR 61.240 and the rule does not apply to the installation.

**Greenhouse Gas Emissions**

Potential emissions of greenhouse gases (CO$_2$e) for this installation are calculated to be 301 tons, classifying the installation as a minor source of GHGs. There are no currently issued GHG regulations applicable to this installation. Missouri regulations do not require the installation to report CO$_2$e emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO$_2$e emissions were not included within this permit.

**Other Regulatory Determinations**

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants*

EP-22 Diesel Fired Water Heater is considered subject to this rule. Using correlation equations from Missouri coal fired units; the estimated opacity can be calculated.

<table>
<thead>
<tr>
<th>Emission Factor</th>
<th>2 lbs/Mgal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heat Capacity</td>
<td>138 MMBtu/Mgal</td>
</tr>
<tr>
<td>Emission Rate</td>
<td>0.014493 lbs/ MMBtu</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>OPACITY</th>
<th>1 Correlation Equations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Labadie</td>
<td>6.50% =((1.973*0.014493)+0.0364)</td>
</tr>
<tr>
<td>Rush Island</td>
<td>12.90% =((2.491*0.014493)+0.0929)</td>
</tr>
<tr>
<td>Chamois 1</td>
<td>-0.15% =((0.5326*0.014493)-0.0092)</td>
</tr>
<tr>
<td>Chamois 2</td>
<td>-0.39% =((0.5951*0.014493)-0.0125)</td>
</tr>
<tr>
<td>Empire</td>
<td>2.99% =((1.0668*0.014493)+0.0144)</td>
</tr>
<tr>
<td>Average</td>
<td>4.37%</td>
</tr>
</tbody>
</table>

1 Correlation equations from MDNR's "Clean Air Act 110(1) Demonstration to Support Amendment to 10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants" Published February 20, 2014
From this demonstration, the calculated average uncontrolled opacity of 4.37% shows that it is unnecessary to monitor the opacity of EP-22 when the emission unit is properly maintained and operated.

10 CSR 10-6.405 Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used For Indirect Heating

Ayers Oil Company is exempt from this regulation because all applicable units are fueled by diesel fuel per 10 CSR 10-6.405(1)(E).

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

1) The specific pollutant regulated by that rule is not emitted by the installation.
2) The installation is not in the source category regulated by that rule.
3) The installation is not in the county or specific area that is regulated under the authority of that rule.
4) The installation does not contain the type of emission unit which is regulated by that rule.
5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).
AUG 06 2018

Mr. Steve Ayers
Ayers Oil Company
P.O. Box 229
Canton, MO 63435

Re: Ayers Oil Company, 111-0019
Permit Number: OP2017-099

Dear Mr. Ayers

Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at http://dnr.mo.gov/regions/. The online CAV request can be found at http://dnr.mo.gov/cav/compliance.htm.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS:dbj

Enclosures

c: PAMS File: 2014-10-060

Recycled paper