PART 70
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.

Operating Permit Number: OP2017-056
Expiration Date: JUL 17 2022
Installation ID: 051-0042
Project Number: 2014-12-033

Installation Name and Address
Phillips 66 Pipeline, LLC
2116 Idlewood Drive
Jefferson City, MO 65110
Cole County

Parent Company's Name and Address
Phillips 66 Pipeline, LLC
2331 City West Boulevard
Houston TX, 77042

Installation Description:
Phillips 66 Pipeline, LLC is a petroleum products and product additives distribution terminal in Jefferson City, Missouri. The main processes associated with this installation are the receipt and storage of propane, petroleum products, and product additives, and the distribution of propane and of petroleum products with or without product additives. The facility is major for volatile organic compounds (VOC) and is a synthetic minor for hazardous air pollutants (HAP). Smaller amounts of PM10, SOx, NOx, and CO are also emitted. The facility is a named installation [10 CSR 10-6.020(3)(B), Table 2, item 22] as a Petroleum storage and transfer facility with a capacity exceeding three hundred thousand (300,000) barrels, therefore fugitive emissions are included in the Potential to Emit.

Prepared by
Kristin Bailey
Operating Permit Unit

Director of Designee
Department of Natural Resources

JUL 17 2017
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 that emits air pollutants and that are identified as having unit-specific emission limitations.

<table>
<thead>
<tr>
<th>Emission Unit #</th>
<th>Description of Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-04/T-4008</td>
<td>Gasoline Tank 4008</td>
</tr>
<tr>
<td>EP-05/T-4009</td>
<td>Gasoline Tank 4009</td>
</tr>
<tr>
<td>EP-06/T-4010</td>
<td>Gasoline Tank 4010</td>
</tr>
<tr>
<td>EP-08/T-4202</td>
<td>Gasoline Tank 4202</td>
</tr>
<tr>
<td>EP-09/T-4203</td>
<td>Gasoline Tank 4203</td>
</tr>
<tr>
<td>EP-10/T-4007</td>
<td>Denatured Ethanol Tank 4007</td>
</tr>
<tr>
<td>EP-07/T-4101</td>
<td>Diesel/Jet kerosene Tank 4101</td>
</tr>
<tr>
<td>T-APhil1</td>
<td>Phillips Additive Tank 1</td>
</tr>
<tr>
<td>T-APhil2</td>
<td>Phillips Additive Tank 2</td>
</tr>
<tr>
<td>T-APhil3</td>
<td>Phillips Additive Tank 3</td>
</tr>
<tr>
<td>NA</td>
<td>Phillips Additive Tank: horizontal fixed roof tank</td>
</tr>
<tr>
<td>T-ADye</td>
<td>Dye Additive Tank</td>
</tr>
<tr>
<td>EP-30/TNKCLN</td>
<td>Tank Roof Landings/Tank Cleanings</td>
</tr>
<tr>
<td>EP-01/FLRACK</td>
<td>Petroleum Liquid Loading Rack</td>
</tr>
<tr>
<td>EP-22/VCU</td>
<td>Vapor Combustion Unit</td>
</tr>
<tr>
<td>EP-21/FUG LIQ, FUG VAPOR</td>
<td>Facility-Wide Fugitive VOC Emissions from Seals, Valves, etc.</td>
</tr>
<tr>
<td>O/W SEP</td>
<td>Oil/Water Separator</td>
</tr>
<tr>
<td>T-Sump</td>
<td>Sump Tank</td>
</tr>
<tr>
<td>WW</td>
<td>Wastewater Tanks</td>
</tr>
<tr>
<td>ENGINES</td>
<td>Diesel Fire Pump Engine, 1988, Combustion Ignition</td>
</tr>
<tr>
<td>T-Fire</td>
<td>Diesel Fire Pump Storage Tank</td>
</tr>
<tr>
<td>EP-14A/#1 Blue</td>
<td>Pipeline Pump Engine #1 Blue, 1930s, spark ignition</td>
</tr>
<tr>
<td>EP-14B/#2 Blue</td>
<td>Pipeline Pump Engine #2 Blue, 1930s, spark ignition</td>
</tr>
<tr>
<td>NA</td>
<td>Permanent Tote</td>
</tr>
<tr>
<td>NA</td>
<td>Two Methanol Additive Totes</td>
</tr>
</tbody>
</table>

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS
The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

<table>
<thead>
<tr>
<th>Emission Unit #</th>
<th>Description of Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-02</td>
<td>Propane loading rack</td>
</tr>
<tr>
<td>EP-29</td>
<td>Venting propane for miscellaneous maintenance events</td>
</tr>
<tr>
<td>T-PD1</td>
<td>Diesel Additive Storage Tank – Winter Additive</td>
</tr>
<tr>
<td>NA</td>
<td>Propane truck loading disconnect emissions</td>
</tr>
<tr>
<td>NA</td>
<td>Ten propane storage vessels (bullets)</td>
</tr>
<tr>
<td>NA</td>
<td>900-gallon stench storage vessel (mercaptan)</td>
</tr>
<tr>
<td>NA</td>
<td>Natural gas fired space heaters</td>
</tr>
<tr>
<td>NA</td>
<td>Portable maintenance flare</td>
</tr>
<tr>
<td>Emission Unit #</td>
<td>Description of Emission Unit</td>
</tr>
<tr>
<td>----------------</td>
<td>------------------------------------</td>
</tr>
<tr>
<td>NA</td>
<td>Ethanol Unloading System</td>
</tr>
<tr>
<td>NA</td>
<td>Lubricity 2000 gallon tank</td>
</tr>
</tbody>
</table>
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 as of the date that this permit is issued. 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 emit less than 10 tons of any individual hazardous air pollutant (HAP) from the entire installation in any consecutive 12-month period.
2) The permittee shall emit less than 25 tons of combined hazardous air pollutants (HAP) from the entire installation in any consecutive 12-month period.

Monitoring/Recordkeeping:
1) The permittee shall use Attachments J and K or an equivalent form(s) generated by the permittee to demonstrate compliance.
2) The permittee shall retain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon request. These records shall include Safety Data Sheets (SDS) for all HAP-containing materials used at the installation.

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 during which records indicate an exceedance of either of the HAP emission limitations.
2) The permittee shall report any deviations from the emission limitations, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certifications required by Section V of this permit.
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 as of the date that this permit is issued.

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Install Year</th>
<th>Max Storage Capacity (gal)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-04/</td>
<td>Gasoline Tank 4008: external floating roof tank;</td>
<td>1937</td>
<td>626,090</td>
</tr>
<tr>
<td></td>
<td>pontoon roof; primary seal mechanical shoe;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>T-4008</td>
<td>secondary seal rim-mounted</td>
<td></td>
<td></td>
</tr>
<tr>
<td>EP-05/</td>
<td>Gasoline Tank 4009: external floating roof tank;</td>
<td>1937</td>
<td>623,400</td>
</tr>
<tr>
<td></td>
<td>pontoon roof; primary seal mechanical shoe;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>T-4009</td>
<td>secondary seal rim-mounted</td>
<td></td>
<td></td>
</tr>
<tr>
<td>EP-06/</td>
<td>Gasoline Tank 4010: external floating roof tank;</td>
<td>1941</td>
<td>620,000</td>
</tr>
<tr>
<td></td>
<td>pontoon roof; primary seal mechanical shoe;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>T-4010</td>
<td>secondary seal rim-mounted</td>
<td></td>
<td></td>
</tr>
<tr>
<td>EP-08/</td>
<td>Gasoline Tank 4202: external floating roof tank;</td>
<td>1947</td>
<td>835,840</td>
</tr>
<tr>
<td></td>
<td>pontoon roof; primary seal mechanical shoe;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>T-4202</td>
<td>secondary seal rim-mounted</td>
<td></td>
<td></td>
</tr>
<tr>
<td>EP-09/</td>
<td>Gasoline Tank 4203: external floating roof tank;</td>
<td>1947</td>
<td>836,680</td>
</tr>
<tr>
<td></td>
<td>pontoon roof; primary seal mechanical shoe;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>T-4203</td>
<td>secondary seal rim-mounted</td>
<td></td>
<td></td>
</tr>
<tr>
<td>EP-10/</td>
<td>Denatured Ethanol Storage Tank 4007; Fixed roof</td>
<td>2008</td>
<td>504,000</td>
</tr>
<tr>
<td>T-4007</td>
<td>with internal floating roof; primary seal mechanical shoe no secondary seal</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Emission Limitations:

1) The permittee shall store only gasoline, general petroleum products which have lower emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAP) than gasoline, ethanol, and transmix which has lower emissions of VOC and HAP than gasoline in tanks 4008, 4009, 4010, 4202, 4203 and 4007.

2) The permittee shall limit the throughput for each of the six tanks 4008, 4009, 4010, 4202, 4203 and 4007 to 250,000,000 gallons per tank in any consecutive 12-month period. Tank throughput includes tank to tank transfers, re-origination to pipeline, and product distributed via loading rack.

Monitoring:

1) The permittee shall monitor that only gasoline, general petroleum products which have lower emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAP) than gasoline, and transmix which has lower emissions of VOC and HAP than gasoline are stored in tanks 4008, 4009, 4010, 4202, 4203 and 4007.

2) Each month the permittee shall verify compliance with the consecutive 12-month throughput limitation on tanks 4008, 4009, 4010, 4202, 4203 and 4007.
Recordkeeping:
1) The permittee shall maintain records of the products stored in tanks 4008, 4009, 4010, 4202, 4203 and 4007. For any product other than gasoline, the permittee shall maintain documentation demonstrating that the product has a maximum true vapor pressure equal to or less than 76.6 kilopascals (11.1 pounds per square inch) at the temperature of storage. The permittee shall note the temperature of storage in this documentation.
2) The permittee shall maintain records of the monthly verifications of compliance with the consecutive 12-month throughput for tanks 4008, 4009, 4010, 4202, 4203 and 4007.
3) These records shall be kept for at least five (5) years. They shall be kept on-site for at least two (2) years. They may be kept in either hard-copy form or on computer media.
4) These records shall immediately be made available for inspection by Department of Natural Resources personnel upon their verbal request and presentation of identification.

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 thirty (30) days after any deviation from or exceedance of this permit condition.
2) The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 002
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63 Subpart A General Provisions and
40 CFR Part 63 Subpart BBBBBB National Emission Standards for Hazardous Air Pollutants for
Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Install Year</th>
<th>Max Storage Capacity (gal)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-04/T-4008</td>
<td>Gasoline Tank 4008: external floating roof tank; pontoon roof; primary seal mechanical shoe; secondary seal rim-mounted</td>
<td>1937</td>
<td>626,090</td>
</tr>
<tr>
<td>EP-05/T-4009</td>
<td>Gasoline Tank 4009: external floating roof tank; pontoon roof; primary seal mechanical shoe; secondary seal rim-mounted</td>
<td>1937</td>
<td>623,400</td>
</tr>
<tr>
<td>EP-06/T-4010</td>
<td>Gasoline Tank 4010: external floating roof tank; pontoon roof; primary seal mechanical shoe; secondary seal rim-mounted</td>
<td>1941</td>
<td>620,000</td>
</tr>
<tr>
<td>EP-08/T-4202</td>
<td>Gasoline Tank 4202: external floating roof tank; pontoon roof; primary seal mechanical shoe; secondary seal rim-mounted</td>
<td>1947</td>
<td>835,840</td>
</tr>
<tr>
<td>EP-09/T-4203</td>
<td>Gasoline Tank 4203: external floating roof tank; pontoon roof; primary seal mechanical shoe; secondary seal rim-mounted</td>
<td>1947</td>
<td>836,680</td>
</tr>
</tbody>
</table>
Emission/Operational Limitations:
1) The permittee must, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. [§63.11085(a)]

2) The permittee shall comply with one of the following three options for each external floating roof gasoline storage tank with a capacity greater than or equal to 75 cubic meters (19,813 gallons) [§63.11087(a)]:
   a) Reduce emissions of total organic HAP or TOC by 95 weight-percent with a closed vent system and control device as specified in §60.112b(a)(3); or
   b) Equip each external floating roof gasoline storage tank according to the requirements in §60.112b(a)(2), except that the requirements of §60.112b(a)(2)(ii) shall only be requirement if such storage tanks do not currently meet the requirements of §60.112b(a)(2)(i); or
   c) Equip each external floating roof gasoline storage tank according to the requirements in §63.1063(a)(1) and (b), and equip each external floating roof gasoline storage tank according to the requirements of §60.1063(a)(2) if such storage tank does not currently meet the requirements of §63.1063(a)(1).

3) The permittee shall perform a monthly leak inspection of all equipment in gasoline serve, as defined in §63.11100. For this inspection, detection methods incorporating sight, sound and smell are acceptable. [§63.11089(a)]

4) The permittee shall attempt to repair any leaks within 5 calendar days of initial detection. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak, unless a repair is not feasible within 15 days. [§63.11089(c)]

Testing Requirements:
1) For gasoline storage tanks equipped with an external floating roof, the permittee must perform inspections of the floating roof system according to the requirements of §60.113b(b), if complying with option 2 under Emission/Operational Limitations of this permit condition, or according to the requirements of §63.1063(c)(2) if complying with option 3. [§63.11092(e)(2)]

2) If the gasoline storage tank is equipped with a closed vent system and control device, the permittee must conduct a performance test and determine a monitored operating parameter value in accordance with the requirements of §63.11092(a) through (d), except that the applicable level of control specified in paragraph (a)(2) shall be a 95-percent reduction in inlet total organic compounds (TOC) levels rather than 80 mg/l of gasoline loaded. [§63.11092(e)(3)]

Recordkeeping:
1) The permittee shall keep records as specified in §60.115b if complying with option 1 or 2 under Emission/Operational Limitations of this permit condition, except records shall be kept for at least 5 years. If complying with the requirements of option 3 under Emission/Operational Limitations of this permit condition, the permittee shall keep records as specified in §63.1065. [§63.11094(a)]

2) The permittee shall keep a log book to be used and signed at the completion of each monthly inspection. The log book shall contain a list, summary description or diagram(s) showing the location of all equipment in gasoline service at the facility as well as each detection of a liquid or vapor leak. [§63.11089(b)]

3) The permittee shall provide an explanation and date the repair was completed for any repairs that take longer than 15 calendar days in the semiannual report specified in §63.11095(b). [§63.11089(d)]
Reporting:

1) If complying with option 1 or 2 under Emission/Operational Limitations of this permit condition, the permittee shall submit a semiannual compliance report containing the information specified in §60.115(b)(a), §60.115(b)(b), or §60.115(b)(c), depending upon the control equipment installed. If complying with the requirements of option 3 under Emission/Operational Limitations of this permit condition, the permittee shall submit a semiannual compliance report containing the information specified in §63.1066. [§63.11095(a)(1)]

2) The permittee shall include the number of equipment leaks not repaired within 15 days after detection in the semiannual compliance report. [§63.11095(a)(3)]

3) The permittee shall submit a Notification of Compliance Status as specified in §63.9(h). The Notification of Compliance Status must specify which of the compliance options is to be used to comply with this subpart. [§63.11093(b)]

4) The permittee must submit additional notifications specified in §63.9, as applicable. [§63.11093(d)]

5) The permittee shall submit a semiannual report including the number, duration, and a brief description of each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken the permittee during a malfunction of an affected source to minimize emissions in accordance with §63.11085(a), including actions taken to correct a malfunction. The report may be submitted as a part of the semiannual compliance report. [§63.11095(d)]

6) The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 003

10 CSR 10-6.070 New Source Performance Regulations

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Install Year</th>
<th>Max Storage Capacity (gal)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-10/T-4007</td>
<td>Denatured Ethanol Storage Tank 4007; Fixed roof with internal floating roof; primary seal mechanical shoe no secondary seal</td>
<td>2008</td>
<td>504,000</td>
</tr>
</tbody>
</table>

Operational Specifications:

The permittee shall equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications: [§60.112b(a)(1)]

1) 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)]

2) 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)]
a) 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)]

b) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous. [§60.112b(a)(1)(ii)(B)]

c) 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)]

3) 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)]

4) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [§60.112b(a)(1)(iv)]

5) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [§60.112b(a)(1)(v)]

6) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [§60.112b(a)(1)(vi)]

7) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [§60.112b(a)(1)(vii)]

8) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. [§60.112b(a)(1)(viii)]

9) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [§60.112b(a)(1)(ix)]

**Monitoring:**

After installing the control equipment required to meet §60.112b(a)(1) (permanently affixed roof and internal floating roof), the permittee shall: [§60.113b(a)]

1) 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 VOL. 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)]

2) 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 VOL 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 Director in the inspection report required in §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 permittee 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)]

3) For vessels equipped with a double-seal system as specified in §60.112b(a)(1)(ii)(B): [§60.113b(a)(3)]
   a) Visually inspect the vessel as specified in §60.113b(a)(4) at least every 5 years; or [§60.113b(a)(3)(i)]
   b) Visually inspect the vessel as specified in §60.113b(a)(2). [§60.113b(a)(3)(ii)]

4) 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 Subpart Kb occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in §60.113b(a)(2) and (a)(3)(ii) and at intervals no greater than 5 years in the case of vessels specified in §60.113b(a)(3)(i). [§60.113b(a)(4)]

Recordkeeping:
1) The permittee shall keep records and furnish reports as required by §60.115b and §60.116b. The permittee shall keep copies of all reports and records required for at least 5 years with the following exception: [§60.115b and §60.116b(a)]
   a) The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be kept for the life of the source. [§60.116b(b)]

2) After installing control equipment in accordance with §60.112b(a)(1) (fixed roof and internal floating roof), the permittee shall meet the following recordkeeping requirements. [§60.115b(a)]
   a) Keep a record of each inspection performed as required by §60.113b(a)(1), (a)(2), (a)(3), and (a)(4). 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). [§60.115b(a)(2)]

3) The permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. [§60.116b(c)]

4) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below. [§60.116b(e)]
   a) For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service. [§60.116b(e)(1)]
   b) For crude oil or refined petroleum products the vapor pressure may be obtained by the following: [§60.116b(e)(2)]
      i) Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product
may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference - see §60.17), unless the Director specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s). [§60.116b(e)(2)(i)]

ii) The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa. [§60.116b(e)(2)(ii)]

c) For other liquids, the vapor pressure: [§60.116b(e)(3)]

i) May be obtained from standard reference texts, or [§60.116b(e)(3)(i)]

ii) Determined by ASTM D2879–83, 96, or 97 (incorporated by reference—see §60.17); or [§60.116b(e)(3)(ii)]

iii) Measured by an appropriate method approved by the Director; or [§60.116b(e)(3)(iii)]

iv) Calculated by an appropriate method approved by the Director. [§60.116b(e)(3)(iv)]

5) The permittee of each vessel storing a waste mixture of indeterminate or variable composition shall be subject to the following requirements. [§60.116b(f)]

a) Prior to the initial filling of the vessel, the highest maximum true vapor pressure for the range of anticipated liquid compositions to be stored will be determined using the methods described in §60.116b(e). [§60.116b(f)(1)]

b) For vessels in which the vapor pressure of the anticipated liquid composition is above the cutoff for monitoring but below the cutoff for controls as defined in §60.112b(a), an initial physical test of the vapor pressure is required; and a physical test at least once every 6 months thereafter is required as determined by the following methods: [§60.116b(f)(2)]

i) ASTM D2879–83, 96, or 97 (incorporated by reference—see §60.17); or [§60.116b(f)(1)(i)]

ii) ASTM D323–82 or 94 (incorporated by reference—see §60.17); or [§60.116b(f)(1)(ii)]

iii) As measured by an appropriate method as approved by the Director. [§60.116b(f)(1)(iii)]

Reporting:

1) After installing control equipment in accordance with §60.112b(a)(1) (fixed roof and internal floating roof), the permittee shall meet the following reporting requirements. [§60.115b(a)]

a) Furnish the Director with a report that describes the control equipment and certifies that the control equipment meets the specifications of §60.112b(a)(1) and §60.113b(a)(1). This report shall be an attachment to the notification required by §60.7(a)(3). [§60.115b(a)(1)]

b) If any of the conditions described in §60.113b(a)(2) are detected during the annual visual inspection required by §60.113b(a)(2), a report shall be furnished to the Director within 30 days of the inspection. Each 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. [§60.115b(a)(3)]

c) After each inspection required by §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in §60.113b(a)(3)(ii), a report shall be furnished to the Director within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of §60.112b(a)(1) or §60.113b(a)(3) and list each repair made. [§60.115b(a)(4)]

2) Notify the Director in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by §60.113b(a)(1) and (a)(4) to afford the Director the opportunity to have an observer present. If the inspection required by §60.113b(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 Director 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 Director at least 7 days prior to the refilling. [§60.113b(a)(5)]

3) The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

**PERMIT CONDITION 004**

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Install Year</th>
<th>Max Storage Capacity (gal)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-07/T-4101</td>
<td>Diesel/Jet Kerosene Tank 4101: vertical fixed roof tank with cone roof</td>
<td>1947</td>
<td>430,000</td>
</tr>
</tbody>
</table>

**Emission Limitations:**

1) The permittee shall store only diesel, jet kerosene, general petroleum products which have lower emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAP) than jet kerosene, and transmix which has lower emissions of VOC and HAP than jet kerosene in tank 4101.

2) The permittee shall limit the throughput for tank 4101 to 180,000,000 gallons in any consecutive 12-month period. Tank throughput includes tank to tank transfers, re-origination to pipeline, and product distributed via loading rack.

**Monitoring:**

1) The permittee shall monitor that only diesel, jet kerosene, general petroleum products which have lower emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAP) than jet kerosene, and transmix which has lower emissions of VOC and HAP than jet kerosene are stored in tank 4101.

2) Each month the permittee shall verify compliance with the consecutive 12-month throughput limitation on tank 4101.

**Recordkeeping:**

1) The permittee shall maintain records of the products stored in tank 4101. For any product other than jet kerosene or diesel, the permittee shall maintain documentation demonstrating that the product has a maximum true vapor pressure equal to or less than 3.5 kilopascals (0.51 pounds per square inch) at the temperature of storage. The permittee shall note the temperature of storage in this documentation.

2) The permittee shall maintain records of the monthly verifications of compliance with the consecutive 12-month throughput for in tank 4101 (EP-07).

3) These records shall be kept for at least five (5) years. They shall be kept on-site for at least two (2) years. They may be kept in either hard-copy form or on computer media.

4) These records shall immediately be made available for inspection by Department of Natural Resources personnel upon their verbal request and presentation of identification.
**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 thirty (30) days after any deviation from or exceedance of this permit condition.

2) The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Max Storage Capacity (gal)</th>
</tr>
</thead>
<tbody>
<tr>
<td>T-APhil1</td>
<td>Phillips Additive Tank 1: horizontal fixed roof tank</td>
<td>3,000</td>
</tr>
<tr>
<td>T-APhil2</td>
<td>Phillips Additive Tank 2: horizontal fixed roof tank</td>
<td>3,000</td>
</tr>
<tr>
<td>T-APhil3</td>
<td>Phillips Additive Tank 3: horizontal fixed roof tank</td>
<td>2,000</td>
</tr>
<tr>
<td>NA</td>
<td>Phillips Additive Tank: horizontal fixed roof tank</td>
<td>1,034</td>
</tr>
<tr>
<td>NA</td>
<td>Permanent Tote</td>
<td>350</td>
</tr>
<tr>
<td>NA</td>
<td>Two Methanol Additive Totes</td>
<td>350 each</td>
</tr>
</tbody>
</table>

**Emission Limitation:**

The permittee shall limit the throughput of petroleum additives for each of the additive tanks to 486,000 gallons in any consecutive 12-month period.

**Monitoring/Recordkeeping/Reporting:**

When in compliance with Permit Condition EP-01 - 002, the permittee will also be in compliance with this emission limitation. Attachment A contains calculations demonstrating compliance. The permittee shall keep this attachment with the permit. No additional monitoring, recordkeeping, or reporting is required.

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-30/</td>
<td>Tank Roof Landings/Tank Cleanings: tanks are emptied to the point that the</td>
</tr>
<tr>
<td>TNKCLN</td>
<td>floating roof is supported on the deck legs, tanks then may or may not be</td>
</tr>
<tr>
<td></td>
<td>degassed, and then re-floated; emptying may be for tank cleaning, inspection,</td>
</tr>
<tr>
<td></td>
<td>or seasonal RVP changes</td>
</tr>
</tbody>
</table>

**Emission Limitation:**

The permittee shall not emit more than 36,000 pounds (18 tons) of volatile organic compounds (VOC) during tank roof landings and tank cleanings in any consecutive 12-month period.

**Monitoring/Recordkeeping:**

1) The permittee shall maintain a record for tanks 4007, 4008, 4009, 4010, 4202, and 4203 identifying the date when the floating roof was set on its legs, the date when the roof was re-floated and the date of degassing. The record shall also indicate whether this was a continuous operation.

2) If the total number of tank roof landings for these six tanks exceeds twelve (12) landings in any consecutive 12-month period and/or the total number of tank cleanings for these six tanks exceeds six (6) cleanings in any consecutive 12-month period, then the permittee shall use the spreadsheet.
shown in Attachment B, VOC Emissions Tracking Record for Tank Roof Landings and Tank Cleanings, or an equivalent form created by the permittee, to demonstrate that the facility is in compliance with this emission limitation for that 12-month period. If the total number of tank roof landings for these six tanks is less than twelve (12) landings in any consecutive 12-month period and the total number of tank cleanings for these six tanks is less than six (6) cleanings in any consecutive 12-month period, the permittee shall be assumed to be in compliance with this permit condition, and is not required to demonstrate compliance with this permit condition using a spreadsheet such as the one in Attachment B for that 12-month period.

3) These records shall be kept for at least five (5) years. They shall be kept on-site for at least two (2) years. They may be kept in either hard-copy form or on computer media.

4) These records shall be made available for inspection by Department of Natural Resources personnel immediately upon their verbal request and presentation of identification.

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 thirty (30) days after any deviation from or exceedance of this permit condition.
2) The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

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**PERMIT CONDITION 007**

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-01</td>
<td>Petroleum Liquid Loading Rack: gasoline/diesel/kerosene bottom loading rack; MHDR 120,000 gal/hr; installed 1940s; modified 1995</td>
</tr>
<tr>
<td>EP-22/VCU</td>
<td>Vapor Combustor Unit with 93.5 % VOC control efficiency; installed 1996</td>
</tr>
</tbody>
</table>

**Emission Limitations:**

1) The permittee shall comply with the requirements of this section. [§60.502]
   a) Each affected facility shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading. [§60.502(a)]
   b) The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded. [§60.502(b)]
   c) Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack. [§60.502(d)]

2) Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures: [§60.502(e)]
   a) The permittee shall obtain the vapor tightness documentation for each gasoline tank truck which is to be loaded at the affected facility. [§60.502(e)(1)]
b) The permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility. [§60.502(e)(2)]

c) The permittee shall cross-check each tank identification number with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is maintained: [§60.502(e)(3)(i)]

i) If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or [§60.502(e)(3)(i)(A)]

ii) If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually. [§60.502(e)(3)(i)(B)]

iii) If either the quarterly or semiannual cross-check provided in paragraphs (2)(c)(i) and (ii) of this section reveals that these conditions were not maintained, the source must return to biweekly monitoring until such time as these conditions are again met. [§60.502(e)(3)(ii)]

d) The permittee shall notify the permittee of each non-vapor-tight gasoline tank truck loaded at the affected facility within 1 week of the documentation cross-check provided in paragraph (2)(c) of this section. [§60.502(e)(4)]

e) The permittee shall take steps assuring that the nonvapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained. [§60.502(e)(5)]

f) Alternate procedures to those described in paragraph (2) of this section for limiting gasoline tank truck loadings may be used upon application to, and approval by, the Director.

3) The permittee shall act to assure that loadings of gasoline tank trucks at the affected facility are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system. [§60.502(f)]

4) The permittee shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the affected facility. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks. [§60.502(g)]

5) The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in §60.503(d) as follows. [§60.502(h)]

a) A pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with ±2.5 mm of water precision, shall be calibrated and installed on the terminal's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline tank truck. [§60.503(d)(1)]

b) During the performance test, the pressure shall be recorded every 5 minutes while a gasoline truck is being loaded; the highest instantaneous pressure that occurs during each loading shall also be recorded. Every loading position must be tested at least once during the performance test. [§60.503(d)(2)]

6) No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water). [§60.502(i)]

**Emission/Operational Limitations:**

The emission/operational limitations under 40 CFR Part 60 Subpart XX, Standards of Performance for Bulk Gasoline Terminals, are as stringent or more stringent than those of 40 CFR Part 63 Subpart
BBB BBB, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. Therefore, if the facility is in compliance with Permit Condition 0160-001, then it will be in compliance with the emission and operational limitations of this Subpart.

Performance Testing:
1) In conducting the performance tests required in §60.8, the permittee shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided in §60.8(b). The three-run requirement of §60.8(f) does not apply to this subpart. [§60.503(a)]

2) Immediately before the performance test required to determine compliance with §60.502 (b), (c), and (h), the permittee shall use Method 21 to monitor for leakage of vapor from all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The permittee shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test. [§60.503(b)]

3) The permittee shall determine compliance with the standards in §60.502 (b) and (c) as follows: [§60.503(c)(1) through (7)]
   a) The performance test shall be 6 hours long during which at least 300,000 liters of gasoline is loaded. If this is not possible, the test may be continued the same day until 300,000 liters of gasoline is loaded or the test may be resumed the next day with another complete 6-hour period. In the latter case, the 300,000-liter criterion need not be met. However, as much as possible, testing should be conducted during the 6-hour period in which the highest throughput normally occurs.
   b) If the vapor processing system is intermittent in operation, the performance test shall begin at a reference vapor holder level and shall end at the same reference point. The test shall include at least two startups and shutdowns of the vapor processor. If this does not occur under automatically controlled operations, the system shall be manually controlled.
   c) The emission rate (E) of total organic compounds shall be computed using the following equation:

   \[ E = \sum_{i=1}^{n} \left( \frac{V_{ei} C_{ei}}{L^{10^6}} \right) \]

   where:

   - E = emission rate of total organic compounds, mg/liter of gasoline loaded.
   - V_{ei} = volume of air-vapor mixture exhausted at each interval “i”, scm.
   - C_{ei} = concentration of total organic compounds at each interval “i”, ppm.
   - L = total volume of gasoline loaded, liters.
   - n = number of testing intervals.
   - i = emission testing interval of 5 minutes.
K = density of calibration gas, $1.83 \times 10^6$ for propane and $2.41 \times 10^6$ for butane, mg/scm.

d) The performance test shall be conducted in intervals of 5 minutes. For each interval “i”, readings from each measurement shall be recorded, and the volume exhausted (Vesi) and the corresponding average total organic compounds concentration (Cei) shall be determined. The sampling system response time shall be considered in determining the average total organic compounds concentration corresponding to the volume exhausted.

e) The following methods shall be used to determine the volume (Vesi) air-vapor mixture exhausted at each interval:
   i) Method 2B shall be used for combustion vapor processing systems.
   ii) Method 2A shall be used for all other vapor processing systems.
   iii) Method 25A or 25B shall be used for determining the total organic compounds concentration (Cei) at each interval. The calibration gas shall be either propane or butane. The permittee may exclude the methane and ethane content in the exhaust vent by any method (e.g., Method 18) approved by the Director.

f) To determine the volume (L) of gasoline dispensed during the performance test period at all loading racks whose vapor emissions are controlled by the processing system being tested, terminal records or readings from gasoline dispensing meters at each loading rack shall be used.

4) The permittee shall determine compliance with the standard in §60.502(h) as follows: [§60.503(d)(1) through (2)]
   a) A pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with ±2.5 mm of water precision, shall be calibrated and installed on the terminal's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline tank truck.
   b) During the performance test, the pressure shall be recorded every 5 minutes while a gasoline truck is being loaded; the highest instantaneous pressure that occurs during each loading shall also be recorded. Every loading position must be tested at least once during the performance test.

5) The performance test requirements of paragraph (c) of this section do not apply to flares defined in §60.501 and meeting the requirements in §60.18(b) through (f). The permittee shall demonstrate that the flare and associated vapor collection system is in compliance with the requirements in §§60.18(b) through (f) and 60.503(a), (b), and (d). [§60.503(e)]

6) The permittee shall use alternative test methods and procedures in accordance with the alternative test method provisions in §60.8(b) for flares that do not meet the requirements in §60.18(b). [§60.503(f)]

**Monitoring:**

Note: Compliance Assurance Monitoring (CAM) applies to these units, so this permit condition incorporates parts of 40 CFR Part 64 and, through that, parts of 40 CFR Part 60. Where conflicts arise between these documents and 40 CFR Part 60, the approved conditions of the CAM plan and CAM test plan (included in this permit condition) govern. A copy of the CAM plan is included with this permit as Attachment D.

1) Monitoring Requirements for the loading rack and VCU:
   a) The permittee shall take timely corrective action during periods of excursions where any of the indicators performance is out of the operational range. A corrective action includes an investigation of the reason for the excursion, evaluation of the problem that led to the excursion and necessary follow-up action to return the emission unit to within the indicator and operational
range. An excursion is determined by the average discreet data point over a period of time. An excursion does not indicate a violation of an applicable requirement.

b) The monitoring requirements for this unit shall be as specified in Table 1: Phillips 66 Pipeline, LLC Vapor Combustion Unit (VCU) Controlling Emissions by Vapor Collection System on a Two-Bay Product Loading Rack – CAM Monitoring Approach.

c) An excursion and its associated averaging time for each emission unit shall be as specified in Table 1: Phillips 66 Pipeline, LLC Vapor Combustion Unit (VCU) Controlling Emissions by Vapor Collection System on a Two-Bay Product Loading Rack – CAM Monitoring Approach.

d) The permittee shall conduct monitoring continuously except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities, in accordance with §64.7(c). Although compliance with the emission limitation may be exempted in some circumstances during conditions such as startup, shutdown, and malfunction, the permittee is required to operate and maintain the source in accordance with good air pollution control practices for minimizing emissions during such periods. This requires the permittee to minimize periods of startup, shutdown or malfunction, and take corrective action to restore normal operation and prevent recurrence of the problem that led to the excursion except where the excursion was related to an excused startup, shutdown, or malfunction.

e) The permittee shall follow the following procedure in response to excursions or exceedances.

i) Upon detecting an excursion or exceedance, the permittee shall restore operation of the unit to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action, or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. [[§64.7(d)(1)]]

ii) Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. [[§64.7(d)(2)]]
<table>
<thead>
<tr>
<th>Table 1</th>
<th>Phillips 66 Pipeline, LLC</th>
<th>Vapor Combustion Unit (VCU) Controlling Emissions by Vapor Collection System on a Two-Bay Product Loading Rack</th>
</tr>
</thead>
<tbody>
<tr>
<td>Indicator</td>
<td>VCU Pilot Flame</td>
<td>Leak Detection and Repair (LDAR) of Vapor Collection System, Vapor Processing System, and Gasoline Loading Rack</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Operation of Assist Air Blower</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Operation of Vapor Line Valve</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Tanker Truck Vapor Tightness</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Comprehensive VCU Inspection</td>
</tr>
<tr>
<td>Measurement Approach</td>
<td>Fire Eye/Thermocouple Flame Sensor</td>
<td>Sight, sound, and smell leak inspections of liquid and vapor piping components associated with the loading rack.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>VCU Programmable Logic Controller (PLC) system start-up check</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Pressure Sensor/Transmitter</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Tanker Truck Vapor Tightness Testing performed annually by tanker truck owner/operator.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Routine cleaning, adjustment, and repair of the VCU system in accordance with John Zink recommendations.</td>
</tr>
<tr>
<td>Indicator Range</td>
<td>Presence of a pilot flame.</td>
<td>No leaks in the Vapor Collection System, Vapor Processing System, and Gasoline Loading Rack.</td>
</tr>
<tr>
<td>-----------------</td>
<td>---------------------------</td>
<td>-------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Excursion</td>
<td>Loading in the absence of a pilot flame.</td>
<td>A leak in the Vapor Collection System, Vapor Processing System, and Gasoline Loading Rack.</td>
</tr>
</tbody>
</table>

All excursions trigger an inspection, corrective action, and a reporting requirement.

**Quality Improvement Plan (QIP) Threshold**

The Permittee shall submit a QIP to the MO Department of Natural Resources, Air Pollution Control Program, Compliance/Enforcement Section if any indicator experiences five (5) excursions, as defined herein, in a 6-month reporting period. The QIP shall be submitted along with the Semiannual Monitoring Report required in the Reporting section of this table below. Additionally, the Permittee shall conduct a full performance test by June 5, 2013, and every five (5) years thereafter for the life of the Part 70 permit, unless that permit has been legally modified, to demonstrate compliance with 40 CFR Part 60, Subpart XX, *Standards of Performance for Bulk Gasoline Terminals.*
<table>
<thead>
<tr>
<th><strong>Data Representativeness</strong></th>
<th>The flame sensor is located within the VCU to view the pilot flame as designed by the manufacturer, John Zink.</th>
</tr>
</thead>
<tbody>
<tr>
<td>The piping components at the loading rack, vapor collection system, and VCU must have integrity to prevent leaks.</td>
<td>The PLC on the VCU is hard programmed to validate the operation of the blower prior to authorizing loading.</td>
</tr>
<tr>
<td>Pressure is monitored within the vapor line. If pressure equals or exceeds 17.5 inches of water column, PLC shall initiate an automatic shutdown.</td>
<td>All tanker trucks loaded shall be properly tested in accordance with 40 CFR Part 60, Subpart XX.</td>
</tr>
<tr>
<td>Inspection and maintenance of the VCU system helps to ensure proper ongoing operation.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Verification of Operational Status</strong></th>
<th>The pilot flame system, as well as the flame sensing system, will be inspected and maintained per manufacturer’s recommendations.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Timely inspections.</td>
<td>The proper functioning of the blower will be determined during scheduled maintenance per manufacturer’s recommendations.</td>
</tr>
<tr>
<td>Inspection of the vapor valve and controls in accordance with manufacturer’s recommendations.</td>
<td>NA</td>
</tr>
<tr>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>QA/QC Practices and Criteria</strong></th>
<th>Semiannual inspection of VCU.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monthly inspection of the vapor collection system. Any and all leaks shall be repaired within fifteen (15) days.</td>
<td>Semiannual inspection of VCU.</td>
</tr>
<tr>
<td>Semiannual inspection of VCU.</td>
<td>Semiannual inspection of VCU.</td>
</tr>
<tr>
<td>Each time driver requests loading, the validity of the testing certification is checked (i.e., is current certification on file in TMS?). If no longer valid, the truck will not be allowed to load.</td>
<td>NA</td>
</tr>
<tr>
<td>Monitoring Frequency</td>
<td>Monitoring Frequency</td>
</tr>
<tr>
<td>----------------------</td>
<td>----------------------</td>
</tr>
<tr>
<td>Continuous while receiving loading request from loading rack Terminal Management System (TMS) computer.</td>
<td>Each time a request to load is received from the TMS computer.</td>
</tr>
<tr>
<td>Monthly.</td>
<td>Continuous while receiving loading request from loading rack TMS computer.</td>
</tr>
</tbody>
</table>
**Recordkeeping:**

1) The tank truck vapor tightness documentation shall be kept on file at the terminal in a permanent form available for inspection. [§60.505(a)]

2) The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, at a minimum, the following information: [§60.505(b)]
   a) Test title: Gasoline Delivery Tank Pressure Test—EPA Reference Method 27. [§60.505(b)(1)]
   b) Tank owner and address. [§60.505(b)(2)]
   c) Tank identification number. [§60.505(b)(3)]
   d) Testing location. [§60.505(b)(4)]
   e) Date of test. [§60.505(b)(5)]
   f) Tester name and signature. [§60.505(b)(6)]
   g) Witnessing inspector, if any: Name, signature, and affiliation. [§60.505(b)(7)]
   h) Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs). [§60.505(b)(8)]

3) The permittee shall keep documentation of all notifications of each non-vapor-tight gasoline tank truck loaded at the affected facility for at least five (5) years. They shall be kept on-site for at least two (2) years. [§60.505(d)]

4) As an alternative to keeping records at the terminal of each gasoline cargo tank test result, the permittee may comply with the requirements below as listed below. [§60.505(e)]
   a) An electronic copy of each record is instantly available at the terminal. [§60.505(e)(1)]
      i) The copy of each record is an exact duplicate image of the original paper record with certifying signatures. [§60.505(e)(1)(i)]
      ii) The permitting authority is notified in writing that each terminal using this alternative is in compliance. [§60.505(e)(1)(ii)]
   b) For facilities that utilize a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection by permitting authority representatives during the course of a site visit, or within a mutually agreeable time frame. [§60.505(e)(2)]
      i) The copy of each record is an exact duplicate image of the original paper record with certifying signatures. [§60.505(e)(2)(i)]
      ii) The permitting authority is notified in writing that each terminal using this alternative is in compliance. [§60.505(e)(2)(ii)]

5) Other recordkeeping requirements for this unit shall be as specified in Table 1: Phillips 66 Pipeline, LLC Vapor Combustion Unit (VCU) Controlling Emissions by Vapor Collection System on a Two-Bay Product Loading Rack – CAM Monitoring Approach.

6) The permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least five (5) years. [§60.505(e)(f)]

7) These records shall immediately be made available for inspection by Department of Natural Resources personnel upon their verbal request and presentation of identification.
**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 thirty (30) days after any deviation from or exceedance of this permit condition.

2) Other recordkeeping requirements for this unit shall be as specified in Table 1: Phillips 66 Pipeline, LLC Vapor Combustion Unit (VCU) Controlling Emissions by Vapor Collection System on a Two-Bay Product Loading Rack – CAM Monitoring Approach.

3) The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-01</td>
<td>Petroleum Liquid Loading Rack: gasoline/diesel/kerosene bottom loading rack; MHDR 120,000 gal/hr; installed 1940s; modified 1995</td>
</tr>
</tbody>
</table>

**Emission Limitations:**

1) The permittee shall limit total throughput of gasoline, general petroleum products which have lower emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAP) than gasoline, and transmix which has lower emissions of VOC and HAP than gasoline at this loading rack to 250,000,000 gallons in any consecutive 12-month period.

2) The permittee shall limit total throughput of diesel, jet kerosene, general petroleum products which have lower emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAP) than jet kerosene, and transmix which has lower emissions of VOC and HAP than jet kerosene at this loading rack to 180,000,000 gallons in any consecutive 12-month period. This 180,000,000 gallons is in addition to, not part of, the 250,000,000 gallons listed above in item 1.

**Monitoring:**

The permittee shall monitor the kind and amount of each product passing through this loading rack each month.

**Recordkeeping:**

1) The permittee shall maintain records of the kind and amount of each product passing through this loading rack each month. The permittee shall maintain the rolling 12-month totals of these amounts.

2) These records shall be kept for at least five (5) years. They shall be kept on-site for at least two (2) years. They may be kept in either hard-copy form or on computer media.

3) These records shall immediately be made available for inspection by Department of Natural Resources personnel upon their verbal request and presentation of identification.

**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 thirty (30) days after any deviation from or exceedance of this permit condition.
2) The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

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</tbody>
</table>

**Operational Requirements:**

1) The permittee shall conduct a full performance test of the VCU and vapor collection system by June 5, 2018, and every five (5) years thereafter to demonstrate compliance with 40 CFR 60, Subpart XX. The test procedure must be approved by the Department at least thirty (30) days prior to initiation of the test. A final report must be submitted to the Department thirty (30) days subsequent to completion of the test. [Condition No. 5]

2) The permittee shall install secondary seals as required by 40 CFR 63, Subpart BBBBBB, for gasoline tanks T-4009 and T-4010 by January 1, 2010, as opposed to the completion date of January 10, 2018, as specified in 40 CFR 63, Subpart BBBBBB. [Condition No. 6]

**NOTE:** A copy of this settlement agreement is included in the permit as Attachment F.

**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 thirty (30) days after any deviation from or exceedance of this permit condition.

2) The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

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<th>Emission Unit</th>
<th>Description</th>
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<tbody>
<tr>
<td>EP-21/FUG LIQ/FUG VAPOR</td>
<td>Facility-wide fugitive VOC emissions from seals, valves, connectors, flanges, pumps, etc.</td>
</tr>
</tbody>
</table>

**Emission Limitation:**

Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected. [§60.502(j)]
Recordkeeping
1) A record of each monthly leak inspection required above in Emission Limitation and as required by §60.502(j) shall be kept on file for at least five (5) years. They shall be kept on-site for at least two (2) years. Inspection records shall include, as a minimum, the following information: [§60.505(c)]
   a) Date of inspection. [§60.505(c)(1)]
   b) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak). [§60.505(c)(2)]
   c) Leak determination method. [§60.505(c)(3)]
   d) Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days). [§60.505(c)(4)]
   e) Inspector name and signature. [§60.505(c)(5)]
2) These records may be kept in either hard-copy form or on computer media.
3) These records shall immediately be made available for inspection by Department of Natural Resources’ personnel upon their verbal request and presentation of identification.

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 thirty (30) days after any deviation from or exceedance of this permit condition.
2) The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 011
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63 Subpart A General Provisions and
40 CFR Part 63 Subpart BBBBBB
National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-21/FUG LIQ/FUG VAPOR</td>
<td>Facility-wide fugitive VOC emissions from seals, valves, connectors, flanges, pumps, etc.</td>
</tr>
</tbody>
</table>

Emission Limitation:
1) Each permittee of a bulk gasoline terminal, bulk plant, pipeline breakout station, or pipeline pumping station subject to the provisions of this subpart shall perform a monthly leak inspection of all equipment in gasoline service, as defined in §63.11100. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. [§63.11089(a)]
2) When a leak is detected an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak. [§63.11089(c)]
3) Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. [§63.11089(c)]

Recordkeeping:
1) A log book shall be used and shall be signed by the permittee at the completion of each inspection. A section of the log book shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility. [§63.11089(b)]

2) The permittee shall record every detection of a liquid or vapor leak in the log book. [§63.11089(c)]

3) The permittee shall prepare and maintain a record describing the types, identification numbers, and locations of all equipment in gasoline service. For facilities electing to implement an instrument program under §63.11089, the record shall contain a full description of the program. [§63.11094(d)]

4) The permittee shall record in the log book for each leak that is detected the information specified below: [§63.11094(3)(1) through (7)]
   a) The equipment type and identification number.
   b) The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell).
   c) The date the leak was detected and the date of each attempt to repair the leak.
   d) Repair methods applied in each attempt to repair the leak.
   e) “Repair delayed” and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak.
   f) The expected date of successful repair of the leak if the leak is not repaired within 15 days.
   g) The date of successful repair of the leak.

**Reporting:**

1) If a repair is not made within 15 days following the detection of a leak, the permittee shall provide in the semiannual report, why the repair was not feasible and the date each repair was completed. [§63.11089(c)]

2) The permittee shall provide the number of equipment leaks not repaired within 15 days after detection in the semiannual compliance report to the Director. [§63.11095(a)(3)]

3) The permittee shall submit an excess emissions report to the Director at the time the semiannual compliance report is submitted which shall include 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: [§63.11095(b)(5)]
   a) The date on which the leak was detected;
   b) The date of each attempt to repair the leak;
   c) The reasons for the delay of repair; and
   d) The date of successful repair.

4) The permittee shall submit a semiannual excess emissions report only for a 6-month period during which an excess emission event has occurred. If no excess emission events have occurred during the previous 6-month period, no report is required. [§63.11095(c)]

5) The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>O/W SEP</td>
<td>Oil/Water Separator: spilled liquid is collected in a rack sump equipped with an oil/water separator</td>
</tr>
<tr>
<td>WW</td>
<td>Two Wastewater Tanks: store wastewater from oil/water separator to be shipped offsite; installed 1940</td>
</tr>
</tbody>
</table>
Emission Limitations:
The permittee shall emit less than 30,000 pounds (15.0 tons) of volatile organic compounds (VOC) from each Emission Unit in any consecutive 12-month period.

Monitoring/Recordkeeping/Reporting:
No monitoring, recordkeeping, or reporting is required for this permit condition. Since each emission unit has a potential to emit 14.7 tons per year of VOC at the maximum hour loading rate in any consecutive 12-month period, the permittee is assumed always to be in compliance. See attachments G and I for calculation of Potential to Emit VOC emissions for each emission unit.

PERMIT CONDITION 013
10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Max Storage Capacity (gal)</th>
</tr>
</thead>
<tbody>
<tr>
<td>T-Sump</td>
<td>Sump Tank: vertical fixed roof tank with dome roof to store oil from oil/water separator</td>
<td>1,094</td>
</tr>
</tbody>
</table>

Emission Limitations:
The permittee shall limit the throughput of oil for the Sump Tank to 486,000 gallons in any consecutive 12-month period.

Monitoring/Recordkeeping/Reporting:
The HAP emissions from the 1,049-gallon sump tank are so low that any fluctuation would not be significant enough to affect the facility’s plant wide emission limit of less than 10 tons of individual hazardous air pollutant (HAP) or 25 tons of combined HAP in any consecutive 12-months. No monitoring, recordkeeping, or reporting is required for this permit condition. See attachment H for calculation of Potential to Emit HAP emissions.

PERMIT CONDITION 014
10 CSR 10-6.260 Restriction of Emissions of Sulfur Compounds

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>ENGINES</td>
<td>Diesel Fire Pump Engine: 196 HP diesel fire pump engine; used for emergencies; installed 1989</td>
</tr>
</tbody>
</table>

Emission Limitations:
The permittee shall not cause or permit the emission into the atmosphere gases containing more than 500 ppmv of sulfur dioxide or more than 35 mg/m³ of sulfuric acid or sulfur trioxide or any combination of these gases averaged on any consecutive three-hour time period.

Operational Limitation:
The Diesel Fire Pump Engine shall be limited to burning fuel oil with a sulfur content of 0.5 percent by weight or less. See Attachment C for the compliance demonstration.

1 This regulation was rescinded on November 30, 2015, but remains an applicable requirement as it remains in Missouri’s State Implementation Plan. This regulation is federally enforceable only.
**Monitoring/Recordkeeping:**
1) The permittee shall monitor the sulfur content of each delivery of fuel documenting that the sulfur content never exceeds 0.5 percent.
2) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3) Records may be kept in either written or electronic form.
4) All records shall be maintained for five years.

**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 any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2) The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

<table>
<thead>
<tr>
<th>Emission Unit</th>
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</tr>
</thead>
<tbody>
<tr>
<td>ENGINES</td>
<td>Diesel Fire Pump Engine: 196 HP diesel fire pump engine; used for emergencies; installed 1989</td>
</tr>
</tbody>
</table>

**PERMIT CONDITION 015**
10 CSR 10-6.261 Control of Sulfur Dioxide Emissions

**Operational Limitation:**
1) The permittee shall limit the fuel sulfur content to 8,812 ppm. [10 CSR 10-6.261(3)(C)]

**Monitoring/Recordkeeping:**
1) The permittee shall demonstrate compliance using: [10 CSR 10-6.261(3)(E)3]
   a) Fuel delivery records; or
   b) Fuel sampling and analysis;
2) The permittee shall maintain a list of modifications to the source’s operating procedures or other routine procedures instituted to prevent or minimize the occurrence of any excess SO₂ emissions
3) The permittee shall maintain a record of data, calculations, results, records, and reports from any SO₂ emissions fuel deliveries, and/or fuel sampling tests
4) The permittee shall maintain the fuel supplier certification information to certify all fuel deliveries. Bills of lading and/or other fuel delivery documentation containing the following information for all fuel purchases or deliveries are deemed acceptable to comply with the requirements of this rule:
   a) The name, address, and contact information of the fuel supplier;
   b) The type of fuel (bituminous or subbituminous coal, diesel, #2 fuel oil, etc.);
   c) The sulfur content or maximum sulfur content expressed in percent sulfur by weight or in ppm sulfur; and
   d) The heating value of the fuel

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2 This regulation has replaced 10 CSR 10-6.260 in the Code of State Regulations. This has not been implemented in Missouri’s State Implementation Plan, and therefore is state only requirement.
5) Sources using fuel sampling and analysis for compliance shall follow the requirements in 10 CSR 10-6.261(5)(D). [10 CSR 10-6.261(4)(D)]
6) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
7) Records may be kept in either written or electronic form.
8) All records shall be maintained for five years.

**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 any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2) The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.
3) The permittee shall report any excess emissions other than startup, shutdown, and malfunction excess emissions already required to be reported under 10 CSR 10-6.050 to the staff director for each calendar quarter within 30 days following the end of the quarter. In all cases, the notification shall be a written report and shall include, at a minimum, the following: [10 CSR 10-6.261(4)(A)]
   a) Name and location of source;
   b) Name and telephone number of person responsible for the source;
   c) Identity and description of the equipment involved;
   d) Time and duration of the period of SO₂ excess emissions;
   e) Type of activity;
   f) Estimate of the magnitude of the SO₂ excess emissions expressed in the units of the applicable emission control regulation and the operating data and calculations used in estimating the magnitude;
   g) Measures taken to mitigate the extent and duration of the SO₂ excess emissions; and
   h) Measures taken to remedy the situation which caused the SO₂ excess emissions and the measures taken or planned to prevent the recurrence of these situations.

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**PERMIT CONDITION 016**

10 CSR 10-6.070 New Source Performance Regulations

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>ENGINES</td>
<td>Diesel Fire Pump Engine: 196 HP diesel fire pump engine; used for emergencies; installed 1989</td>
</tr>
</tbody>
</table>

**Operational Requirements:**
1) The permittee must be in compliance with the applicable requirements of MACT ZZZZ at all times. [§63.6605(a)]
2) The permittee must, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. [§63.6605(b)]
3) The permittee must have a non-resettable hour meter installed on the emergency generator if one hasn’t already been installed. [63.6625(f)]

**Work Practice Standards:**
1) The permittee shall, for each emergency RICE, meet the following requirements *except during periods of startup*; [Table 2d, to Subpart ZZZZ of Part 63]
   a) Change oil and filter every 500 hours of operation or annually, whichever comes first; The permittee has the option to utilize an oil analysis program as described in §63.6625(i) or (j) in order to extend the specified oil change requirement.
   b) Inspect spark plugs/air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary; and
   c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
2) The permittee shall minimize, during periods of startup, the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. [§63.6625(h)]
3) The permittee shall operate the emergency stationary RICE according to the requirements in §63.6640(f)(1) through (4). In order for the engine to be considered an emergency stationary RICE under MACT ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in §63.6640(f)(1) through (4), is prohibited. If the permittee does not operate the engine according to the requirements in §63.6640(f)(1) through (4), the engine will not be considered an emergency engine under MACT ZZZZ and shall meet all requirements for non-emergency engines. [§63.6640(f)]
   a) There is no time limit on the use of emergency stationary RICE in emergency situations. [§63.6640(f)(1)]
   b) The permittee may operate the emergency stationary RICE for any combination of the purposes specified in §63.6640(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §63.6640(f)(4) counts as part of the 100 hours per calendar year allowed by this paragraph (f). [§63.6640(f)(2)]
      i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]
   c) The permittee may operate the emergency stationary RICE for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in §63.6640(f)(2). Except as provided in §63.6640(f)(4)(ii), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(4)]
The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

- The engine is dispatched by the local balancing authority or local transmission and distribution system operator. [§63.6640(f)(4)(ii)(A)]
- The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. [§63.6640(f)(4)(ii)(B)]
- The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. [§63.6640(f)(4)(ii)(C)]
- The power is provided only to the facility itself or to support the local transmission and distribution system. [§63.6640(f)(4)(ii)(D)]
- The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the permittee. [§63.6640(f)(4)(ii)(E)]

**Recordkeeping:**
1. The permittee must keep records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
2. The permittee must keep records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(5)]
3. The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according the facility’s own maintenance plan. [§63.6655(e)]
4. The permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation. [§63.6655(f)]
5. If the permittee uses the engine for the purposes specified in §63.6640(f)(4)(ii), the permittee must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. [§63.6655(f)]
6. The permittee shall keep all records in either written or electronic form, and the records must be retained for a minimum of five years.
7. The permittee shall make all records available immediately for inspection to the Department of Natural Resources’ personnel upon request.

**Reporting:**
1. The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit and to the Administrator at EPA Region 7, 11201 Renner Boulevard, Lenexa, Kansas 66219.
2) The permittee must submit the annual report electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to MACT ZZZZ is not available in CEDRI at the time that the report is due, the written report shall be submitted to the Administrator at EPA Region 7, 11201 Renner Boulevard, Lenexa, Kansas 66219.

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
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<tbody>
<tr>
<td>T-Fire</td>
<td>Diesel Fire Pump Tank: 260-gallon diesel horizontal fixed roof tank; installed 1989</td>
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</table>

**Emission Limitation:**
The permittee shall limit the throughput for the Diesel Fire Pump Tank to 2,500 gallons in any consecutive 12-month period.

**Monitoring/Recordkeeping/Reporting:**
The HAP emissions from the 260-gallon diesel fire pump tank are so low that any fluctuation would not be significant enough to affect the facility’s plant wide emission limit of less than 10 tons of individual hazardous air pollutant (HAP) or 25 tons of combined HAP in any consecutive 12-months. No monitoring, recordkeeping, or reporting is required for this permit condition.
IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the 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 as of the date that this permit is issued. The following are only excerpts from the regulation or code, and are provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

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.

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.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

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:
   a) Name and location of installation;
   b) Name and telephone number of person responsible for the installation;
   c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
   d) Identity of the equipment causing the excess emissions;
   e) Time and duration of the period of excess emissions;
   f) Cause of the excess emissions;
   g) Air pollutants involved;
   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;
   i) Measures taken to mitigate the extent and duration of the excess emissions; and
   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.

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.

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.
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 pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.

**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 requirement is not federally enforceable.

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. This odor evaluation shall be taken at a location outside of the installation’s property boundary.

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 nor 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

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,

<table>
<thead>
<tr>
<th>10 CSR 10-6.065(6)(C)1.B Permit Duration</th>
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<tbody>
<tr>
<td>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.</td>
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<table>
<thead>
<tr>
<th>10 CSR 10-6.065(6)(C)1.C General Record Keeping and Reporting Requirements</th>
</tr>
</thead>
</table>
| 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 Compliance/Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.  
   b) The permittee shall submit a report of all required monitoring by:  
      i) October 1st for monitoring which covers the January through June time period, and  
      ii) April 1st for monitoring which covers the July through December time period.  
   c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.  
   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.A 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 semiannual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction. |
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.

<table>
<thead>
<tr>
<th>10 CSR 10-6.065(6)(C)1.D</th>
<th>Risk Management Plan Under Section 112(r)</th>
</tr>
</thead>
<tbody>
<tr>
<td>The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process at a stationary source, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68.</td>
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<table>
<thead>
<tr>
<th>10 CSR 10-6.065(6)(C)1.F</th>
<th>Severability Clause</th>
</tr>
</thead>
<tbody>
<tr>
<td>In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.</td>
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<table>
<thead>
<tr>
<th>10 CSR 10-6.065(6)(C)1.G</th>
<th>General Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
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<tr>
<td>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.</td>
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<tr>
<td>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.</td>
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<tr>
<td>4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.</td>
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<tr>
<td>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 pursuant to 10 CSR 10-6.065(6)(C)1.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>10 CSR 10-6.065(6)(C)1.H</th>
<th>Incentive Programs Not Requiring Permit Revisions</th>
</tr>
</thead>
<tbody>
<tr>
<td>No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.</td>
<td></td>
</tr>
</tbody>
</table>


**10 CSR 10-6.065(6)(C)1.1 Reasonably Anticipated Operating Scenarios**

Calculations tying general product throughput limitations to emission limitations were done for a worst-case scenario by assuming that Tanks 4008, 4009, 4010, 4202, and 4203 stored gasoline and Tank 4101 stored jet kerosene. Furthermore, the calculations for each tank were done as if that one tank were handling the entire throughput of the kind of fuel it stored. (Tank 4008 emissions were calculated as if all the gasoline went through it and none went through Tank 4009. Then Tank 4009 emissions were calculated as if all the gasoline went through Tank 4009 and none went through Tank 4008. Emissions for each of the other tanks were calculated as if the entire throughput of gasoline went through that tank and none went through the other six tanks.) Doing the calculations this way makes the following operating scenarios allowable.

1) Operating scenarios which involve handling one or more general products with emissions less than or equal to those of gasoline and storing these general product(s) in Tank 4008, Tank 4009, Tank 4010, Tank 4202, and/or Tank 4203 are allowable, providing that:
   a) the facility is in compliance with all other permit conditions, and
   b) the facility’s total throughput of such other general product(s) and the gasoline, taken together, does not exceed the throughput limitation for gasoline specified in this permit.

2) There are no restrictions on how the total allowable throughput of gasoline and general products with lower emissions than gasoline is divided among Tank 4008, Tank 4009, Tank 4010, Tank 4202 and/or Tank 4203.

3) Operating scenarios which involve handling one or more general products with emissions less than or equal to those of jet kerosene and storing these general product(s) in Tank 4101 are allowable, providing that:
   a) the facility is in compliance with all other permit conditions, and
   b) the facility’s total throughput of such other general product(s) and the jet kerosene, taken together, does not exceed the throughput limitation for jet kerosene specified in this permit.

**10 CSR 10-6.065(6)(C)3 Compliance Requirements**

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 EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions 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(6)(C) 6 Permit Shield

1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:

a) The applicable requirements are included and specifically identified in this permit, or
b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.

2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:

a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
c) The applicable requirements of the acid rain program,
d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

10 CSR 10-6.065(6)(C) 7 Emergency Provisions

1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7. A 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(6)(C)8 Operational Flexibility

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
   a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
   b) The permit shield shall not apply to these changes.
10 CSR 10-6.065(6)(C)9 Off-Permit Changes

1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. 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 subject to any requirements under Title IV of the Act or is a Title I modification;

b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. 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.

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; and

d) The permit shield shall not apply to these changes.

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

The application utilized in the preparation of this permit was signed by Mr. Rodger Lewis. On October 31, 2016, the Air Pollution Control Program was informed that Mr. David Soukup was the responsible official. 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.

10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause

This permit may be reopened for cause if:

1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,

2) MDNR 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,

3) 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,

4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit;

or

5) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065(6)(E)1.C 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.

VI. Attachments

Attachments follow.
ATTACHMENT A
Calculation of Additive Throughput

This spreadsheet is used to demonstrate that the additive tanks are in compliance with Permit Condition ADDITIVE TANKS-001 as long as the permittee is in compliance with Permit Condition EP-01-002.

Since additives are injected at the loading rack when petroleum products are loaded into tank trucks, the additive throughput is dependent and proportional to the throughput of the petroleum products loaded. For a worst-case scenario, the maximum injection rate is 1.944 gallons of additive per thousand gallons of petroleum product.

Permit Condition EP-01-002 limits the throughput at the Petroleum Liquid Loading Rack (EP-01) to 250,000,000 gallons of gasoline and petroleum products which have lower emissions of VOC and HAP than gasoline in any consecutive 12-month period and to 180,000,000 gallons of jet kerosene and petroleum products which have lower emission of VOC and HAP than jet kerosene in any consecutive 12-month period. For a worst-case scenario, assume 1.944 gallons of additive per thousand gallons for gasoline throughput and a throughput of 250,000,000 gallons per year. Then the maximum throughput for each additive tank can be calculated as follows:

\[
\text{Additive Throughput} = \frac{1.944 \text{ galAdditive}}{1000 \text{ galPetroleum Product}} \times \left( \frac{2.5 \times 10^6 \text{ gal Petroleum Product}}{\text{yr}} \right) = \frac{486,000 \text{ galAdditive}}{\text{yr}}
\]

Therefore, compliance with the throughput limitations for petroleum products at the racks will also result in compliance with the throughput limitations for additives, and no additional monitoring, recordkeeping, or reporting requirements are necessary for Permit Condition ADDITIVE TANKS-001.

Furthermore, the emissions from any additive tanks associated with the Propane Loading Rack are so low that any fluctuation would not be significant enough to affect the facility’s plant wide emission limit of less than 10 tons of individual or 25 tons of combined Hazardous Air Pollutants (HAP).
ATTACHMENT B
VOC Emissions Tracking Record for Tank Roof Landings/Tank Cleanings

This spreadsheet is used to calculate emissions from landing a floating roof on its support legs and emissions from cleaning a tank. Tank roof landings occur for such activities as change of service or seasonal Reid Vapor Pressure (RVP) change.

This spreadsheet or an equivalent form must be completed if the permittee has performed more than 12 total tank landings and/or 6 tank cleanings facility-wide in any 12 consecutive months. A total VOC emission of less than 36,000 lbs (18 tons) in any 12 consecutive months demonstrates compliance.

For month of _____________ in year of _________________

<table>
<thead>
<tr>
<th>Tank ID</th>
<th>Event</th>
<th>Date of Event</th>
<th>Product</th>
<th>Diameter (ft)</th>
<th>Idle time Default =1 (days)</th>
<th>Bottom Slope Default = 0.25 (in/ft)</th>
<th>Height of Roof Deck Default = 4 (ft)</th>
<th>Height of Stock Liquid Default = 0 for empty (ft)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example</td>
<td>Landing</td>
<td>7/19/06</td>
<td>Gasoline</td>
<td>60</td>
<td>1</td>
<td>0.25</td>
<td>4</td>
<td>0</td>
</tr>
<tr>
<td>Example</td>
<td>Cleaning</td>
<td>7/19/06</td>
<td>Gasoline</td>
<td>60</td>
<td>5</td>
<td>0.25</td>
<td>4</td>
<td>0</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>10 (h₁)</th>
<th>11 (hₑ)</th>
<th>12 (hₑ)</th>
<th>13 (Vₑ)</th>
<th>14 (Vₑ)</th>
<th>15 (Vₑ)</th>
<th>16 (a)</th>
<th>17 (Tₑ₁)</th>
<th>18 (Tₑ₂)</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.5</td>
<td>0.042</td>
<td>4.17</td>
<td>117.81</td>
<td>11898.78</td>
<td>11780.97</td>
<td>0.17</td>
<td>88.6</td>
<td>66.2</td>
</tr>
<tr>
<td>0.5</td>
<td>0.042</td>
<td>4.17</td>
<td>117.81</td>
<td>11898.78</td>
<td>11780.97</td>
<td>0.17</td>
<td>88.6</td>
<td>66.2</td>
</tr>
</tbody>
</table>
ATTACHMENT B (continued)
VOC Emissions Tracking Record for Tank Roof Landings/Tank Cleanings

Company Name: Phillips 66 Pipeline, LLC
Facility Location: 2116 Idlewood Rd, Jefferson City, MO
Facility ID: 051-0042 Cole County

For month of _____________ in year of ________________

<table>
<thead>
<tr>
<th>19 (I)</th>
<th>20 (T_a)</th>
<th>21 (ΔT_d)</th>
<th>22 (T_is)</th>
<th>22 (ΔTv)</th>
<th>23 (RVP)</th>
<th>24 (S_d)</th>
<th>25 (A)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Daily Total Solar Insulation (Btu/ft² day)</td>
<td>Average Ambient Temp (R)</td>
<td>Daily Temp Difference (R/day)</td>
<td>Stock Liquid Surface Temp (R)</td>
<td>Vapor Space Temp Range (R/day)</td>
<td>RVP # Stock Reid Vapor Pressure (15, 13, 9 or 0.022)</td>
<td>Stock ASTM distillation slope (3, 3, 3, 2, rest)</td>
<td>=15.64-1.854S_d^{0.5}-(0.8742-0.3280S_d^{0.5})ln(RVP)</td>
</tr>
<tr>
<td>2101.6</td>
<td>537.4</td>
<td>22.4</td>
<td>540.2</td>
<td>26.1</td>
<td>13</td>
<td>3</td>
<td>11.6</td>
</tr>
<tr>
<td>2101.6</td>
<td>537.4</td>
<td>22.4</td>
<td>540.2</td>
<td>26.1</td>
<td>13</td>
<td>3</td>
<td>11.6</td>
</tr>
</tbody>
</table>

Stock True Vapor Pressure (e^x where x = A-(B/T_is) (psia))
Stock Vapor Molecular Weight (lb/lb-mole)
Density of Condensed Vapor Stock (M/P/RT_is) (lb/ft³)
Stock Liquid Density (lb/ft³)
Vapor Space Expansion Factor (T_v/T_is(1+(0.5BP/T_is(P_a-P)))
Standing Idle Saturation Factor (1/(1+0.053)(P_h))
Refilling Saturation Factor Default = 0.3

<table>
<thead>
<tr>
<th>26 (B)</th>
<th>27 (P)</th>
<th>28 (M_v)</th>
<th>29 (W_v)</th>
<th>30 (W_l)</th>
<th>31 (K_e)</th>
<th>32 (K_sh)</th>
<th>33 (K_sf)</th>
</tr>
</thead>
<tbody>
<tr>
<td>5043.58</td>
<td>10.05</td>
<td>62</td>
<td>0.107</td>
<td>41.88</td>
<td>0.583</td>
<td>0.311</td>
<td>0.3</td>
</tr>
<tr>
<td>5043.58</td>
<td>10.05</td>
<td>62</td>
<td>0.107</td>
<td>41.88</td>
<td>0.583</td>
<td>0.311</td>
<td>0.3</td>
</tr>
</tbody>
</table>
### ATTACHMENT B (continued)

**VOC Emissions Tracking Record for Tank Roof Landings/Tank Cleanings**

Company Name: Phillips 66 Pipeline, LLC  
Facility Location: 2116 Idlewood Rd, Jefferson City, MO  
Facility ID: 051-0042  
Facility Location: Cole County

<table>
<thead>
<tr>
<th>34 (Lₘₐ)</th>
<th>35 (Lₘₐ)</th>
<th>36 (Lₖ)</th>
<th>37 (Lₜ)</th>
<th>38 (Lₜ)</th>
<th>39</th>
<th>40 (Lₚ)</th>
<th>41 (Lₚ)</th>
<th>42 (Lₜ)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Standing Idle Losses &lt;span&gt;(nₜVₜWₜKₜKₚ)&lt;/span&gt; (lb)</td>
<td>Maximum Standing Idle Losses &lt;span&gt;(5.90²hₑWₑ)&lt;/span&gt; (lb)</td>
<td>Filling Losses &lt;span&gt;(0.00014D²hₑKₑPₚMₑ)&lt;/span&gt; (lb)</td>
<td>Total Losses from landing &lt;span&gt;(Lₘₐ + Lₖ)&lt;/span&gt; (lb)</td>
<td>Total Losses from landing &lt;span&gt;(Lₜ/2000)&lt;/span&gt; (ton)</td>
<td>Was the tank cleaned when the roof was landed &lt;span&gt;(Yes = 1, No = 0)&lt;/span&gt;</td>
<td>Losses from degassing &lt;span&gt;(PMₚVₚ/Rₜₑ)&lt;/span&gt; (lb)</td>
<td>Losses from degassing (ton)</td>
<td>Total Losses from landing, refilling, and degassing (ton)</td>
</tr>
<tr>
<td>229</td>
<td>37064</td>
<td>393</td>
<td>662</td>
<td>0.311</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0.311</td>
</tr>
<tr>
<td>1147</td>
<td>37064</td>
<td>393</td>
<td>1539</td>
<td>0.770</td>
<td>1</td>
<td>1279.03</td>
<td>0.640</td>
<td>1.409</td>
</tr>
</tbody>
</table>

Total the final Lₜ (Col 42) from this record and add to the Lₜ from the previous 11 months to get the running 12-month total of VOC emissions.  
**A total VOC emission of less than 18 tons in any 12 consecutive months demonstrates compliance.**
ATTACHMENT C
10 CSR 10-6.260 Compliance Worksheet

This attachment may be used to demonstrate that the Diesel Fire Pump Engine is always in compliance with 10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds

**Diesel Fire Pump Engine (ENGINES)**

This rule is applicable to the diesel fire pump engine and is included as permit condition Engines-001 for this unit. The unit is in compliance as summarized below:

**General Equation:**

$$ppmv\, SO_2 = \frac{SO_2\, \text{Emission Factor (lb/MBtu)}}{F\, \text{factor (wscf/MMBtu)}} \div \text{Conversion Factor (ppm/ppmv)}$$

1) The SO$_2$ emission factor = 0.29 lb/MMBtu (U.S. EPA document AP-42 Table 3.3-1)
   
   This emission factor assumes that all of the sulfur in the fuel is converted to SO$_2$ emissions.

2) The F factor is the ratio of gas volume of products of combustion to the heat content of the fuel. For fuel oil, the F factor is 10,320 wscf/MMBtu. (40 CFR Part 60 Appendix A, Method 19, Table 19-2).

3) Conversion factor for lb/scf to ppm is 1.660E-7 lb/scf per ppm (40 CFR Part 60 Appendix A, Method 19, Table 19-1).

4) Conversion factor for ppm weight to ppmv = 28.8/MW = 28.8/64 = 0.45 (U.S. EPA document AP-42 Appendix A)

$$ppmv\, SO_2 = \left(\frac{0.29\, \text{lb}}{\text{MMBtu}}\right) \left(\frac{\text{MMBtu}}{10,320\, \text{ft}^3}\right) \left(\frac{\text{scf}}{1.667 \times 10^{-7}\, \text{lb}}\right) \left(\frac{0.45\, \text{ppmv}}{\text{ppmw}}\right) = 76\, \text{ppmv} < 500\, \text{ppmv}$$
ATTACHMENT D

Compliance Assurance Monitoring (CAM) for Gasoline Loading Rack and Vapor Combustion Unit

General Information

Facility: Jefferson City Products Terminal

Owner/Operator: Phillips 66 Pipeline, LLC

Address: 1503 Idlewood
Jefferson City, MO

Current Operating Permit: 051-0042-0001

Affected Units: Two Bay Product Loading Rack
Vapor Collection System
Vapor Combustion Unit (VCU) – Control Device

Applicable Regulations

Federal: 40 CFR 60, Subpart XX; 40 CFR 63, Subpart BBBBBB

Emission Limitations: 35 mg TOC/Liter of gasoline loaded (0.2921 lb/1000gal)

Operating Requirements: All transport trucks loading at the facility must supply annual certifications that the trailer has been successfully tested per the provision of 40 CFR 60.502.

Inspection Requirements: Monthly leak inspections (sight, sound, smell) of loading rack and control device during loading. All leaks must be repaired within 15 days.

Performance Testing: The control device must be performance tested, as required, per the provisions listed under 40 CFR 60.503.

System Monitoring: Pilot flame sensor on combustion device and a Monitoring and Inspection Plan as required by 40 CFR 63.11092(b)(iii)(B)(2).

State: Incorporated by reference – 40 CFR 60, Subpart XX

Settlement Agreement for NOV 508MTI

Facility to be in compliance with GD-GACT (40 CFR 63, Subpart BBBBBB) requirements on January 10, 2010 vs. January 10, 2011.

A John Zink or other qualified technician will be present during one of the semi-annual preventive maintenance periods each year beginning in 2009 and running thru 2014.

The permittee shall perform a full performance test on the VCU and vapor collection system no later than June 5, 2013 and then once every 5-years thereafter.
ATTACHMENT D (continued)
CAM Plan

Performance Testing

A performance test of the VCU was conducted on June 05, 2008. This testing was performed in accordance with NSPS Subparts A and XX. The results of this testing indicated that the system was capable of meeting the 35 mg/L emissions limit. All test parameters met NSPS requirements.

The next performance test will take place on or before June 5, 2018.

Proposed Compliance Assurance Monitoring (CAM)

Please refer Tables 1, 2 and 3 for summaries of the monitoring procedures.

VCU – Monitoring (Pilot Flame): The VCU has an interlock system tied to the presence of a pilot flame that prevents the operation of the VCU and the loading of product at the rack, when no pilot flame is present.

Rationale: The monitoring for the presence of a pilot flame prior to and during loading has been the accepted practice for Flares and Vapor Combustion Units since the promulgation of NSPS Subpart XX and is specified as part of an EPA approved alternative monitoring plan within GD-GACT.

The pilot flame on the VCU at Phillips 66 Pipeline, LLC is monitored using a Fire Eye system. If no pilot flame is detected during the startup sequence, the VCU control system does not allow the TMS rack system to initiate loading. If the pilot flame goes out for any reason during the loading process, the VCU control system immediately commands the TMS rack computer to stop loading.

Due to the design of the VCU, the presence of a pilot flame ensures that all gasoline loading vapors are combusted sufficiently to comply with the 35 mg/L limit.

All failures of the pilot flame to ignite prior to loading and any times when the pilot flame goes out during loading will be logged, investigated, repaired and tested prior to allowing loading to begin. The lack of a pilot flame is an excursion under this plan.

VCU – Monitoring (Assist Air Blower and Vapor Line Valve): Per the requirements of the Monitoring and Inspection Plan (MIP) under 40 CFR 63.11092(b)(iii)(B)(2)(ii), the following items will be checked daily.

Assist Air Blower: The operation of the blower is validated each time a request to load is issued to the PLC by the Terminal Management System (TMS). If the PLC detects that the blower is not running, the VCU will shut-down and the PLC removes the permissive to load from the TMS.

Vapor Line Valve: Proper operation of the vapor valve will be monitored using a pressure transmitter that will constantly measure the vapor line system pressure. If the system pressure reaches 17.5 inches of water column at any time, the PLC immediately shuts down the VCU and commands the rack to stop loading. The sensing of high pressure in the vapor line is indicative a problem with the vapor valve, or other blockage or restriction in the vapor processing system piping.
**ATTACHMENT D (continued)**

**CAM Plan**

**Loading Rack Product Loading and Vapor Collection System:** Perform monthly inspections for liquid and vapor leaks using sight, sound, and smell methodologies. This incorporates all gasoline piping systems and the vapor collection system up to the combustion chamber on the VCU.

Rationale: This is the widely accepted process for leak detection and repair throughout the regulated community and is promulgated under NSPS Subpart XX and NESHAP Subparts R and BBBBBB.

The presence of a leak in either a liquid or vapor line will be logged and is to be repaired within 15-days of discovery. Failure to repair the leak with the 15-day period constitutes an excursion under this CAM plan and an excess emission under GD-GACT.

**Transport Trucks:** All transport trucks loading at the terminal must provide annual vapor tightness testing certifications. These certifications are entered into the facilities Terminal Management System (TMS) loading control system. Vend cards are issued for each approved transport truck tank car. If the certification on file is older than one-year, the TMS computer automatically locks out the specific transport until a new certification is provided.

Rationale: This is the industry standard practice to ensure that all transport truck tank cars are vapor tight. The methodologies are promulgated under NSPS Subpart XX and NESHAP Subparts R and BBBBBB.

All trucks requesting to load at the terminal must submit valid certifications of annual vapor tightness testing on the transport trailer to be loaded. Failure to provide a valid test certification or the expiration of a certification will prevent the trailer from being loaded until a valid certification is presented. An attempt to load a trailer without valid testing documentation would be an excursion under this plan.

**VCU Routine Preventive Maintenance:** Twice a year, the VCU will be shut-down and fully inspected for the following items and any repairs/recalibrations made. During at least one of these maintenance periods, a Technician from John Zink Company LLC will be present to assist in the inspection, check the control system and tune the unit, for a five-year period beginning in 2009.

Rationale: The performance of routine maintenance on the VCU system ensures that the unit is operating properly and any problems with the unit (physical and operational) are detected and repaired. Having a John Zink technician during an inspection will allow the control system to be checked and software updated regularly, as well as training the site operations personnel how to perform these detailed inspections and adjustments. The semi-annual preventive maintenance is a requirement of the alternate monitoring pathway under GD-GACT.

**VCU Performance Tests:** A full performance test of the VCU and vapor collection system will be conducted on or before June 5, 2013, and every five years thereafter, using a test procedure approved by the Department at least 30 days prior to initiation of the test. A final report will be submitted to the Department 30 days subsequent to completion of the test.

Rationale: Conducting a performance test of the VCU system demonstrates that the unit is operating properly and meets the required emission limits.
## ATTACHMENT D (continued)
### CAM Plan

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Indicator #1</th>
<th>Indicator #2</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Indicator</strong></td>
<td>Presence of Pilot Flame</td>
<td>LDAR</td>
</tr>
<tr>
<td><strong>Measurement Approach</strong></td>
<td>Flame sensor (Fire Eye/Thermocouple)</td>
<td>Monthly sight, sound, and smell leak inspections on liquid and vapor piping components associated with the loading rack.</td>
</tr>
<tr>
<td><strong>Indicator Range</strong></td>
<td>Presence or absence of pilot flame</td>
<td>Failure to repair a leak within 15-days of discovery.</td>
</tr>
<tr>
<td><strong>Quality Improvement Plan (QIP) Threshold</strong></td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td><strong>Performance Criteria</strong></td>
<td>The flame sensor is located within the VCU to view the pilot flame as designed by the manufacturer</td>
<td>The piping components at the loading rack, vapor collection system and VCU are inspected monthly.</td>
</tr>
<tr>
<td><strong>Data Representativeness</strong></td>
<td>The pilot flame system as well as the flame sensing system will be inspected and maintained per manufacturers recommendations</td>
<td>NA</td>
</tr>
<tr>
<td><strong>Verification of Operational Status</strong></td>
<td>Semi-Annual inspection of VCU</td>
<td>NA</td>
</tr>
<tr>
<td><strong>QA/QC Practices and Criteria</strong></td>
<td>Continuous while receiving loading request from loading rack TMS computer.</td>
<td>Inspections perform monthly</td>
</tr>
<tr>
<td><strong>Monitoring Frequency</strong></td>
<td>Any excursions will be logged by operations personnel</td>
<td>Sight, sound and smell, leaks recorded on leak log by operations personnel.</td>
</tr>
<tr>
<td><strong>Data Collection Procedure</strong></td>
<td>None/NA</td>
<td>None/NA</td>
</tr>
</tbody>
</table>
## ATTACHMENT D (continued)
### CAM Plan

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Indicator #3</th>
<th>Indicator #4</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Indicator</strong></td>
<td>Tanker Truck vapor tightness testing documentation</td>
<td>Semi-Annual Preventive Maintenance on VCU.</td>
</tr>
<tr>
<td><strong>Measurement Approach</strong></td>
<td>Owner/Operator of tanker truck trailer responsible for the annual testing and providing valid certifications to Phillips 66 Pipeline, LLC</td>
<td>Semi-Annual comprehensive inspection, cleaning, adjustment, repair of VCU system. John Zinc Technician present annually</td>
</tr>
<tr>
<td><strong>Indicator Range</strong></td>
<td>Failure to present valid testing certification</td>
<td>Inspections are not at least 6 months apart.</td>
</tr>
<tr>
<td><strong>Quality Improvement Plan (QIP) Threshold</strong></td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td><strong>Performance Criteria</strong></td>
<td>Testing performed on each transport allowed to load at terminal. Testing must comply with NSPS XX requirements to be valid.</td>
<td>Inspection of the VCU system will ensure that the system is in good condition and is operating properly</td>
</tr>
<tr>
<td><strong>Data Representativeness</strong></td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td><strong>Verification of Operational Status</strong></td>
<td>Valid testing certifications must be provided annually. All valid certifications are entered into the loading rack TMS computer.</td>
<td>NA</td>
</tr>
<tr>
<td><strong>QA/QC Practices and Criteria</strong></td>
<td>Annual retesting and submittal of valid test certifications. Each time driver requests loading, the validity of the testing certification (i.e., is current certification on file) is check. If no longer valid, the truck will not be allowed to load.</td>
<td>Semi-annual, with John Zink Technician present during at least one of the inspection events during the 5-year period beginning in 2009.</td>
</tr>
<tr>
<td><strong>Monitoring Frequency</strong></td>
<td>Loading Rack TMS Computer system</td>
<td>Results of inspection and repairs recorded</td>
</tr>
<tr>
<td><strong>Data Collection Procedure</strong></td>
<td>None/NA</td>
<td>None/NA</td>
</tr>
<tr>
<td><strong>Averaging Period</strong></td>
<td>None/NA</td>
<td>None/NA</td>
</tr>
</tbody>
</table>
March 13, 2009

Mr. Bob Randolph  
Air Pollution Control Program  
Missouri Department of Natural Resources  
1659 East Elm St.  
Jefferson City, MO 65101

Submittal of VCU Monitoring and Inspection Plan  
Jefferson City Products Terminal  
Permit Number: 051-0042-0001  
40 CFR 63, Subpart BBBBBA (GD – GACT)  
ConocoPhillips Pipe Line Company

Dear Mr. Randolph:

ConocoPhillips Pipe Line Company (CPPL) owns and operates the Jefferson City Products Terminal, a bulk storage and product distribution terminal. The terminal is subject to the Gasoline Distribution GACT (40 CFR 63, Subpart BBBBBA) regulations.

CPPL has elected to comply with the alternate monitoring path under GD-GACT (§63.11092(b)(1)(iii)(B)). The enclosed Monitoring and Inspection Plan (MIP) required when following the alternative pathway is being submitted for your review and approval per §63.11092(b)(1)(iii)(B)(2).

If you have any questions about this plan or require any additional information, please call at (580) 767-5041.

Sincerely,

Kelly W. Hayes  
Environmental Coordinator
ATTACHMENT E (continued)
Alternative Monitoring Proposal

CONOCOPHILLIPS PIPE LINE COMPANY
JEFFERSON CITY PRODUCTS TERMINAL
GD-GACT – MONITORING AND INSPECTION PLAN

This plan has been developed in accordance with 40 CFR Part 63 Subpart BBBBBB National Emission Standards for Hazardous Air Pollutants for source categories: Gasoline Distribution or GD-GACT. The plan describes malfunctions as well as the scheduled monitoring and inspections of the vapor collection system and thermal oxidation system (VCU) during normal operations at the Jefferson City Products Terminal. Each possible malfunction event includes a description of the type of equipment involved, the automatic measures taken and the corrective actions taken by facility personnel to correct the problem.

Control Device

Manufacturer: John Zink

Plan Updates

The plan should be reviewed periodically to ensure that the anticipated events and required actions meet the current operations at the facility. In the event that the response to a malfunction event did not follow the plan, or the event was not anticipated in the current plan, the MIP plan must be updated within 45 days of the event.

ConocoPhillips Pipe Line Company
Jefferson City Products Terminal
GD-GACT – Monitoring and Inspection Plan
ATTACHMENT E (continued)
Alternative Monitoring Proposal

G-GACT MONITORING OPTIONS FOR VCU's

The testing and monitoring section of GD-GACT (§63.11092(b)), requires that a continuous monitoring system be installed on the emission control device for the loading rack. There are two monitoring options for Vapor Combustion Units (VCU’s) within this section.

The primary option requires the installation of a Continuous Parameter Monitoring System (CPMS) that will measure the combustion temperature within the VCU stack (§63.11092(b)(1)(iii)(A)).

The alternative option requires the operator to verify each day, the proper operation of pilot flame, assist-air blower and vapor-valve as well as performing semi-annual preventive maintenance inspections of the VCU (§63.11092(b)(1)(iii)(B)).

ConocoPhillips Pipe Line has selected the alternative monitoring path at this terminal. The following pages provide details on how the various parameters are monitored; preventive maintenance activities are conducted as well as the actions taken when malfunctions occur.

AUTOMATIC MONITORING OF VCU OPERATIONS

Pilot Flame: [§63.11092(b)(1)(iii)(B)(1) and (B)(2)(i)]

The pilot flame is only lit when a request is sent to the VCU control system (PLC) from the loading rack control system (TMS). When a request is received, the PLC initiates a pre-programmed start-up sequence. This process includes the purging of the VCU burners and chamber with air from the blower system. Following the purge, the PLC commands the pilot flame to ignite. This typically occurs on the first attempt. The PLC is programmed to attempt to light the pilot flame three times before the PLC automatically shuts down, sends a shut-down command to the TMS and an alarm is sounded. No loading at the rack can occur until operations personnel have investigated the alarm, determined the problem, corrected the issue, cleared the alarm and cleared the system to return to normal operation.

The PLC also monitors for a flame during the entire period that loading occurs at the rack. If for some reason there is no combustion or pilot flame (i.e., no flame present) once loading has begun, the PLC is programmed to shut-down the VCU and stop all loading at the rack. A shut-down alarm (pilot failure light on the unit panel) will be activated. This alarm would be addressed in the same manner as a failure to ignite.

Assist-Air Blower: [§63.11092(b)(1)(iii)(B)(2)(ii)]

As with the pilot flame, the air-assist blower is active during preparation to load, during active loading, and after loading is completed. As part of the start-up sequence, the PLC will command the blower to turn on and purge the system. If the blower fails to start, the PLC will command an automatic shut-down of the VCU, send a shut-down command to the rack, and issue a shut-down alarm (air blower failure light on the unit panel). As with a failure to ignite the pilot flame, no loading can occur at the rack until the fault is determined, corrected, alarm re-set and system returned to operational status.

If the blower should fail during loading, the PLC will immediately shut-down the loading rack, VCU and sound an alarm. This alarm would be addressed by operations in the same manner as a failure during start-up.
ATTACHMENT E (continued)
Alternative Monitoring Proposal

**Vapor Line Valve:** [63.11092(b)(1)(ii)(B)(2)(ii)]

The vapor line valve is commanded to open and close based on the inlet stream pressure in the vapor line from the loading rack. Once the VCU has authorized loading to start at the rack, the vapor line pressure increases, when the pressure in the vapor line reaches 3-inches of water column, the valve is commanded to open. At the end of the loading cycle, the valve will remain open until the vapor line pressure falls below 0.5 inches of water column for 15 seconds. The pressure in the vapor line upstream of the vapor valve is monitored with a pressure transmitter. If for some reason the vapor valve does not open properly the pressure transmitter will sense the increase in line pressure and if the pressure reaches 17.5 inches of water column, the PLC will command the VCU and loading rack to shutdown. The PLC will not allow the VCU to operate or loading to occur until the fault is corrected.

**Automatic Shutdown System:** [63.11092(b)(1)(ii)(B)(2)(ii)]

Any time that no flame is observed, the air blower fails, or the vapor valve malfunctions, the PLC on the VCU will automatically issue a command to shut-down the VCU, remove the permissive to allow loading at the loading rack and indicate the failure on the unit control panel. If the PLC itself fails, the VCU will automatically shut down. The VCU operation is “fail-safe” for any malfunctions or failures on the VCU operating system.

If the terminal emergency shut down system is activated, the terminal system shuts down the loading rack and sends a command to the PLC to immediately initiate an automatic shutdown of the VCU.
ATTACHMENT E (continued)
Alternative Monitoring Proposal

EMI-ANNUAL INSPECTION/PREVENTIVE MAINTENANCE OF VCU SYSTEM
63.11092(b)(1)(iii)(B)(2)(iii)]

The entire VCU system will be thoroughly inspected according to manufacturer's recommendations at least twice a year.

During these inspections, all manufacturer recommended preventive maintenance and inspection activities will be performed. The following items are of particular importance to controlling emissions from the unit.

Piping systems:

- Evidence of leaks on all connects and valves.
- Confirm proper operation of vapor valve

Combustor Section:

- Inspect the burner tips for damage/deterioration
- Conduct differential pressure test on the burners to check for blockages
- Inspect the pilot flame assembly and ignition system
- Confirm pilot gas supply pressure and pilot ignition
- Confirm the proper operation of the air damper louvers
- Clean flame and/or detonation arrestors
- Confirm the proper operation of the assist air blower

PLC System:

- Verify that the PLC is functioning properly and all input/output signals are correct.
- Perform system tests as detailed in the manufacturer's operation manual for the Lamp test, Pilot Failure, Assist Air Blower, Vapor Valve (Automatic Block Valve), Pilot gas pressure (high/low).

Loading Rack Terminal Management System PLC Commanded Shut-Down:

- Verify that if/when the PLC commands a shut-down of the VCU and loading rack, that TMS terminates loading at the rack.

Terminal Emergency Shutdown System:

- Verify that if/when the terminals emergency shutdown system is activated the PLC receives the shutdown order and immediately commands the automatic shut-down of the VCU.
STARTUPS AND SHUTDOWNS DURING NORMAL OPERATIONS
[63.11092(b)(1)(iii)(B)(2)(iv)]

The following sections describe the startups and shutdowns that can occur at the Jefferson City Products Terminal and corrective actions taken to repair the fault.

Product Loading Rack VCU:

<table>
<thead>
<tr>
<th>Frequency and Duration</th>
<th>Emissions From Event</th>
<th>Corrective Actions to be Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pilot flame, air blower, and vapor valve are controlled by the PLC during normal operations. No conventional startups or shutdowns.</td>
<td>None</td>
<td>If any faults are detected during the startup of the VCU, the PLC is program to automatically shut-down the VCU and not allow loading to occur until all faults are repaired and this system is operating normally.</td>
</tr>
</tbody>
</table>

NOTE: Any failures that occur during automatic start-up or shut-down would be the same as those detailed under MALFUNCTIONS DURING NORMAL OPERATION.
ATTACHMENT E (continued)
Alternative Monitoring Proposal

FUNCTIONS DURING NORMAL OPERATION [63.11092(b)(1)(iii)(B)(2)(iv)]

The following section describes the VCU malfunctions that can occur at the Jefferson City Products Terminal and the corrective actions taken to repair the fault. Please contact the Environmental Coordinator about any malfunctions so that any potential emissions from the event can be determined and any reports submitted per GD-GACT requirements.

All actions must comply with all applicable CPPL safety policies and procedures, as well as manufacturer's recommendations and procedures.

Product Loading Rack VCU:

<table>
<thead>
<tr>
<th>Malfunction Description</th>
<th>Automatic Response</th>
<th>Excess Emissions From Event</th>
<th>Corrective Actions to be Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pilot Flame Failure</td>
<td>PLC shuts VCU down and issues shut down command to TMS.</td>
<td>No Excess Emissions</td>
<td>Diagnose and repair pilot flame system before allowing loading to occur.</td>
</tr>
<tr>
<td>Assist Air Blower Failure</td>
<td>PLC shuts VCU down and issues shut down command to TMS.</td>
<td>No Excess Emissions</td>
<td>Diagnose and repair assist air blower system before allowing loading to occur.</td>
</tr>
<tr>
<td>Vapor Valve Operation Failure</td>
<td>PLC shuts VCU down and issues shut down command to TMS.</td>
<td>No Excess Emissions</td>
<td>Diagnose and repair vapor valve system before allowing loading to occur.</td>
</tr>
</tbody>
</table>

Follow the manufactures procedures and any site specific processes in managing malfunctions at the VCU.

Record all malfunction events on the Truck Loading Rack VCU MIP Log Sheet and note on MIP Activity Log.

Timely Repair Estimates [63.11092(b)(1)(iii)(B)(2)(iv)]

Any malfunction occurring in the VCU System that directly affects the proper operation of the unit will be fully repaired prior to restarting the system and allowing loading to resume. The time to fix any given malfunction is dependent on the nature/cause of the failure, the equipment involved, and the availability of replacement parts.

Despite the variability of the total time of repair, the following actions will be taken in all instances: [Timelines from 63.11092(c)(4)]

- **Diagnosis**: Following the safe shut-down of the unit and loading rack, the diagnosis of the failure will be initiated within 1-hr of the event.

- **Initial Attempt**: Once the cause of the fault has been determined, an initial attempt at repair will be initiated within 24-hours of the event.

- **Complete Repair**: Depending on the nature of the failure and timing on receipt of parts, all repairs should be complete within 15 calendar days of the event. Regardless of the time required to repair the VCU and/or Loading Rack, loading will not be allowed until the VCU/Rack are fully repaired and operating properly.
ATTACHMENT F
Settlement Agreement

ATTORNEY GENERAL OF MISSOURI
JEFFERSON CITY
65102
July 31, 2009

Linda Ladrich
ConocoPhillips Pipe Line Company
P.O. Box 4783
Houston, TX 77210

RE: Settlement Agreement

Dear Ms. Ladrich:

Enclosed please find a copy of a fully-executed Settlement Agreement in this case for your files. Since this document has been fully executed, your civil penalty payment of $20,000.00 will now be forwarded to the Cole County School Fund.

Thank you for your cooperation in this matter.

Sincerely yours,

CHRIS KOSTER
Attorney General

JOHN K. Mc MANUS
Chief Counsel
Phone: (573) 751-8370

JKM:ka
Enclosure
c: Steve Feeler, MDNR-APCP
ATTACHMENT F (continued)
Settlement Agreement

SETTLEMENT AGREEMENT

This Settlement Agreement is made by and among the Missouri Attorney General’s Office ("Attorney General"), the Missouri Department of Natural Resources ("the Department"), and ConocoPhillips Pipe Line Company ("ConocoPhillips"). This agreement is made on the date this document is executed by the Department.

WHEREAS, on June 28, 2007, the Department informed ConocoPhillips, located in Jefferson City, Cole County, Missouri, that they would be required to conduct emissions testing for 40 CFR Part 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals, as part of development of a Compliance Assurance Monitoring Plan for its Part 70 Operating Permit.

WHEREAS, a performance test was scheduled for November 1, 2007, that had to be rescheduled to December 5, 2007, because ConocoPhillips was experiencing operational problems. The December 5, 2007, test was also canceled because the Vapor Combustion Unit (VCÜ) was not operating properly.

WHEREAS, on March 26, 2008, ConocoPhillips completed its performance test and the test report was received by the Department on May 5, 2008. A review of the report showed that Total Organic Compound emissions from the unit were 68.7 mg/L as compared to the limit of 35 mg/L. The Department issued Notice of Violation ("NOV") No. 508MTI to ConocoPhillips on May 13, 2008, for failure to comply with 10 CSR 10-6.070, New Source Performance Regulations, that adopts by reference 40 CFR 60, Subpart XX, Standards for Performance for Bulk Gasoline Terminals.

WHEREAS, the Department, the Attorney General and ConocoPhillips desire to amicably resolve all disputes or claims which could be made against ConocoPhillips listed in NOV No. 508MTI for violations of the Missouri Air Conservation Law and regulations.
ATTACHMENT F (continued)
Settlement Agreement

NOW, THEREFORE, in consideration of the mutual promises contained herein and other
good and valuable consideration, the Department, the Attorney General, and ConocoPhillips
agree as follows:

1. The provisions of this Agreement shall apply to and be binding upon the parties
executing this Agreement, their agents, subsidiaries, affiliates, and lessees, including the officers,
agents, servants, corporations and any persons acting under, through, or for the parties agreeing
hereto.

2. ConocoPhillips, in compromise and satisfaction of the allegations or claims
relating to the above-referenced claimed violations, agrees, without admitting liability or fault, to
pay the sum of $20,000.00 as a civil penalty and to conduct all other activities required by this
settlement agreement. The parties hereto agree that a certified check in the amount of $20,000.00
made payable to the “State of Missouri (Cole County School Fund),” shall be forwarded to JoAnn
Horvath, Collections Specialist, P.O. Box 899, Jefferson City, MO 65102-0899 upon
ConocoPhillip’s execution of this Agreement.

3. ConocoPhillips shall maintain the VCU in compliance with the alternative
monitoring requirements specified in 40 CFR 63, Subpart BBBBBB, National Emission
Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk
Terminals, Bulk Plants, and Pipeline Facilities, one year earlier (January 1, 2010) than the date
of compliance specified in 40 CFR 63, Subpart BBBBBB (January 1, 2011).

4. ConocoPhillips shall have Mr. John Zink or another qualified technician present
during one (1) of their semi-annual preventative maintenance periods each year, beginning in
2009, for five (5) consecutive years, to instruct ConocoPhillips’ facility technicians on how to
ATTACHMENT F (continued)
Settlement Agreement

better inspect and adjust the VCU. ConocoPhillips shall notify the Department thirty (30) days subsequent to its completion.

5. ConocoPhillips shall conduct a full performance test of the VCU and vapor collection system by June 5, 2013, and every five (5) years thereafter to demonstrate compliance with 40 CFR 60, Subpart XX. The test procedure must be approved by the Department at least thirty (30) days prior to initiation of the test. A final report must be submitted to the Department thirty (30) days subsequent to completion of the test.

6. ConocoPhillips shall install secondary seals as required by 40 CFR 63, Subpart BBBB, for gasoline tanks T-4009 and T-4010 by January 1, 2010, as opposed to the completion date of January 10, 2018, as specified in 40 CFR 63, Subpart BBBB.

7. The Department and the Attorney General agree not to bring or cause to be brought any civil action against ConocoPhillips for penalties arising out of the above-referenced claimed violations of the Air Conservation Law and/or regulations referred to in NOV No. 508MTI in the event ConocoPhillips complies with the terms herein. In the event that ConocoPhillips fails to both fully and timely comply with the terms of this settlement agreement, ConocoPhillips is not released from the above-referenced claimed violations and the Department and the Attorney General may bring whatever action they deem appropriate to enforce the terms of this settlement agreement, to pursue the above-referenced claimed violations, or both.

8. ConocoPhillips agrees to comply with the Missouri Air Conservation Law and its implementing regulations for any and all future activity. Nothing herein shall be construed as forgiving future non-compliance with the Missouri Air Conservation Law and its implementing regulations.
ATTACHMENT F (continued)
Settlement Agreement

9. The terms stated herein constitute the entire and exclusive agreement of the parties hereto. There are no other obligations of the parties, be they express or implied, oral or written, except those which are expressly set out in this Settlement Agreement. The terms of this Settlement Agreement supersede all previous memoranda of understanding, notes, conversations, and agreements whether express or implied. This agreement may not be modified orally.

IN WITNESS WHEREOF, the parties hereto have executed this agreement as follows:

MISSOURI DEPARTMENT OF NATURAL RESOURCES

By: 
James L. Kavanaugh, Director
Air Pollution Control Program
Date: 7-1-09

CHRIS KOSTER
ATTORNEY GENERAL OF MISSOURI

By: 
John K. McManus
Chief Counsel
Date: 6/25/09

CONOCOPHILLIPS PIPE LINE COMPANY

By: 
Miles B. Kayoata
(Printed)
Name: Miles B. Kayoata
Title: Manager, Terminals
Date: 6/18/09
ATTACHMENT G
Annual VOC Emissions from Wastewater Tank (WW)

The Wastewater Tank emissions were calculated assuming that the tank can be modeled as an oil-water separator. The maximum design loading rate for the wastewater tank is 16.8 (1000 gal/hr) or 147,168 (1000 gal/yr).

\[ E = Q \times EF \]

Where:
- \( E \) = VOC emissions rate (lb/hr)
- \( Q \) = maximum wastewater tank loading rate = 147,168 (1000 gal/yr)
- \( EF \) = Oil-water separator emission factor (lb total VOC/1000 gal wastewater); assumed to be 0.2 lb/1000 gal from U.S. EPA document AP-42, Table 9.1-2

\[ E = 147,168 \times 0.2 \times \frac{1}{2000} \times 1 \text{ ton/2000 lbs} = 14.7 \text{ tpy} \]
ATTACHMENT H
Annual VOC Emissions from Sump Tank (T-Sump)

The calculation for annual VOC emission from Sump Tank was done with the TANKS 4.09D software provided by the US EPA. Since the software does not have the capability to transfer its output into Word documents, the output report was printed, scanned, and added to this document as scanned images. The following five pages are the TANKS 4.09D report for this tank.
### ATTACHMENT H (continued)

**Annual VOC Emissions from Sump Tank (T-Sump)**

<table>
<thead>
<tr>
<th>Tank Identification and Physical Characteristics</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Sump Tank</td>
<td>Phillips 66 Pipeline, LLC</td>
</tr>
<tr>
<td>City</td>
<td>Cleburne</td>
</tr>
<tr>
<td>State</td>
<td>Texas</td>
</tr>
<tr>
<td>Type of Tank</td>
<td>Vertical Fixed Roof Tank</td>
</tr>
<tr>
<td>Gasoline (RVP 6); OP 2002-09-09</td>
<td></td>
</tr>
<tr>
<td>Liquid Height (ft):</td>
<td>8.00</td>
</tr>
<tr>
<td>Volume (gallons):</td>
<td>5,983.57</td>
</tr>
<tr>
<td>Net Throughput (gallons):</td>
<td>486,000.00</td>
</tr>
<tr>
<td>Paint Characteristics</td>
<td></td>
</tr>
<tr>
<td>Type:</td>
<td>White/White</td>
</tr>
<tr>
<td>Material</td>
<td>Good</td>
</tr>
<tr>
<td>Name</td>
<td>White/White</td>
</tr>
<tr>
<td>Type:</td>
<td>Dome</td>
</tr>
<tr>
<td>Condition</td>
<td>Good</td>
</tr>
</tbody>
</table>

**Meteorological Data used in Emissions Calculations:**

- **Columbia, Missouri (Avg Atmospheric Pressure = 14.3 psi):**
  - Relative Humidity: 0.90
  - Temperature (°F): 60.00
  - Pressure (psig): 14.3

---

**Note:**
- The table above details the characteristics and physical properties of the Sump Tank (T-Sump) including liquid height, volume, net throughput, paint characteristics, and meteorological data used for emissions calculations.
### ATTACHMENT H (continued)

#### Annual VOC Emissions from Sump Tank (T-Sump)

<table>
<thead>
<tr>
<th>Component</th>
<th>TANKS 4.0.9d</th>
<th>Liquid Contents of Storage Tank</th>
<th>Sump Tank - Vertical Fixed Roof Tank</th>
<th>Jefferson City, Missouri</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gasoline</td>
<td>RVP (°F)</td>
<td>Avg. 50.69</td>
<td>Avg. 51.03</td>
<td>Avg. 52.85</td>
</tr>
<tr>
<td></td>
<td>Max.</td>
<td>50.96</td>
<td>Max. 51.03</td>
<td>Max. 53.85</td>
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<tr>
<td></td>
<td>Min.</td>
<td>50.36</td>
<td>Min. 51.03</td>
<td>Min. 53.85</td>
</tr>
<tr>
<td></td>
<td>Vap. Press.</td>
<td>Avg. 2.9811</td>
<td>Avg. 2.9923</td>
<td>Avg. 2.9979</td>
</tr>
<tr>
<td></td>
<td>Max.</td>
<td>2.9923</td>
<td>Max. 2.9979</td>
<td>Max. 99.0000</td>
</tr>
<tr>
<td></td>
<td>Liquid Temp.</td>
<td>Avg. 66.9</td>
<td>Avg. 67.0</td>
<td>Avg. 67.0</td>
</tr>
<tr>
<td></td>
<td>Avg.</td>
<td>66.9</td>
<td>Avg. 67.0</td>
<td>Avg. 67.0</td>
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<tr>
<td></td>
<td>Min.</td>
<td>66.7</td>
<td>Min. 67.0</td>
<td>Min. 67.0</td>
</tr>
<tr>
<td></td>
<td>Vap. Press.</td>
<td>Avg. 91.03</td>
<td>Avg. 91.03</td>
<td>Avg. 91.03</td>
</tr>
<tr>
<td></td>
<td>Max.</td>
<td>91.03</td>
<td>Max. 91.03</td>
<td>Max. 91.03</td>
</tr>
<tr>
<td></td>
<td>Liquid Temp.</td>
<td>Avg. 91.03</td>
<td>Avg. 91.03</td>
<td>Avg. 91.03</td>
</tr>
<tr>
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<td>Avg. 91.03</td>
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<tr>
<td></td>
<td>Min.</td>
<td>91.03</td>
<td>Min. 91.03</td>
<td>Min. 91.03</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Component</th>
<th>TANKS 4.0.9d</th>
<th>Liquid Contents of Storage Tank</th>
<th>Sump Tank - Vertical Fixed Roof Tank</th>
<th>Jefferson City, Missouri</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gasoline</td>
<td>RVP (°F)</td>
<td>Avg. 50.69</td>
<td>Avg. 51.03</td>
<td>Avg. 52.85</td>
</tr>
<tr>
<td></td>
<td>Max.</td>
<td>50.96</td>
<td>Max. 51.03</td>
<td>Max. 53.85</td>
</tr>
<tr>
<td></td>
<td>Min.</td>
<td>50.36</td>
<td>Min. 51.03</td>
<td>Min. 53.85</td>
</tr>
<tr>
<td></td>
<td>Vap. Press.</td>
<td>Avg. 2.9811</td>
<td>Avg. 2.9923</td>
<td>Avg. 2.9979</td>
</tr>
<tr>
<td></td>
<td>Max.</td>
<td>2.9923</td>
<td>Max. 2.9979</td>
<td>Max. 99.0000</td>
</tr>
<tr>
<td></td>
<td>Liquid Temp.</td>
<td>Avg. 66.9</td>
<td>Avg. 67.0</td>
<td>Avg. 67.0</td>
</tr>
<tr>
<td></td>
<td>Avg.</td>
<td>66.9</td>
<td>Avg. 67.0</td>
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</tr>
<tr>
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<td>Min.</td>
<td>66.7</td>
<td>Min. 67.0</td>
<td>Min. 67.0</td>
</tr>
<tr>
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<td>Vap. Press.</td>
<td>Avg. 91.03</td>
<td>Avg. 91.03</td>
<td>Avg. 91.03</td>
</tr>
<tr>
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<td>Max. 91.03</td>
<td>Max. 91.03</td>
</tr>
<tr>
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<td>Liquid Temp.</td>
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<td>Avg. 91.03</td>
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<tr>
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<td>Avg. 91.03</td>
<td>Avg. 91.03</td>
</tr>
<tr>
<td></td>
<td>Min.</td>
<td>91.03</td>
<td>Min. 91.03</td>
<td>Min. 91.03</td>
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</table>
### Annual Emission Calculations

<table>
<thead>
<tr>
<th>Description</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Standing Losses (ft³)</td>
<td>60.8779</td>
</tr>
<tr>
<td>Vapor Space Volume (cu ft)</td>
<td>120.2314</td>
</tr>
<tr>
<td>Vapor Density (l/bbl)</td>
<td>0.0385</td>
</tr>
<tr>
<td>Vapor Space Expansion Factor</td>
<td>0.0054</td>
</tr>
<tr>
<td>Vented Vapor Saturation Factor</td>
<td>0.8533</td>
</tr>
</tbody>
</table>

### Tank Vapor Space Volume

<table>
<thead>
<tr>
<th>Description</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vapor Space Volume (cu ft)</td>
<td>120.2314</td>
</tr>
<tr>
<td>Tank Diameter (ft)</td>
<td>8.0000</td>
</tr>
<tr>
<td>Vapor Space Outage (ft²)</td>
<td>4.2523</td>
</tr>
<tr>
<td>Tank Shell Height (ft)</td>
<td>5.0000</td>
</tr>
<tr>
<td>Average Liquid Height (ft)</td>
<td>5.0000</td>
</tr>
<tr>
<td>Roof Outage (ft²)</td>
<td>0.2523</td>
</tr>
</tbody>
</table>

### Roof Outage (Cone Roof)

<table>
<thead>
<tr>
<th>Description</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Roof Outage (ft)</td>
<td>0.2523</td>
</tr>
<tr>
<td>Cone Radius (ft)</td>
<td>8.0000</td>
</tr>
<tr>
<td>Shell Radius (ft)</td>
<td>3.0000</td>
</tr>
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</table>

### Vapor Density

<table>
<thead>
<tr>
<th>Description</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vapor Density (l/bbl ft)</td>
<td>0.0385</td>
</tr>
<tr>
<td>Vapor Molecular Weight (lb/mole)</td>
<td>69.0000</td>
</tr>
<tr>
<td>Vapor Pressure at Daily Average Liquid</td>
<td>2.6811</td>
</tr>
<tr>
<td>Surface Temperature (deg R)</td>
<td>515.3651</td>
</tr>
<tr>
<td>Daily Avg. Liquid Surface Temp. (deg F)</td>
<td>53.8735</td>
</tr>
<tr>
<td>Liquid Gas Constant R</td>
<td>10.731</td>
</tr>
<tr>
<td>(grain (lbf-mil)/ (ft-lb-mil-deg R))</td>
<td>513.6270</td>
</tr>
<tr>
<td>Tank Paint Solar Absorption (Shed)</td>
<td>0.1700</td>
</tr>
<tr>
<td>Tank Paint Solar Absorption (Roof)</td>
<td>0.1700</td>
</tr>
<tr>
<td>Daily Total Solar Insulation Factor (Btu/ft² day)</td>
<td>1.372456</td>
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</table>

### Vented Vapor Expansion Factor

<table>
<thead>
<tr>
<th>Description</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vented Vapor Expansion Factor</td>
<td>0.0084</td>
</tr>
<tr>
<td>Daily Vapor Temperature Range (deg R)</td>
<td>21.3428</td>
</tr>
<tr>
<td>Daily Vapor Pressure Range (psia)</td>
<td>0.9005</td>
</tr>
<tr>
<td>Dewar Vent Press. Setting Range (psia)</td>
<td>0.0600</td>
</tr>
<tr>
<td>Vapor Pressure at Daily Average Liquid Surface Temperature (psia)</td>
<td>2.8611</td>
</tr>
<tr>
<td>Vapor Pressure at Daily Maximum Liquid Surface Temperature (psia)</td>
<td>2.3932</td>
</tr>
<tr>
<td>Vapor Pressure at Daily Maximum Liquid Surface Temperature (psia)</td>
<td>3.9879</td>
</tr>
<tr>
<td>Daily Avg. Liquid Surface Temp. (deg R)</td>
<td>515.3651</td>
</tr>
<tr>
<td>Daily Min. Liquid Surface Temp. (deg R)</td>
<td>510.0252</td>
</tr>
<tr>
<td>Daily Max. Liquid Surface Temp. (deg R)</td>
<td>520.9981</td>
</tr>
<tr>
<td>Daily Ambient Temp. Range (deg R)</td>
<td>20.6750</td>
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</tbody>
</table>

### Vented Vapor Saturation Factor

<table>
<thead>
<tr>
<th>Description</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vented Vapor Saturation Factor</td>
<td>0.8533</td>
</tr>
<tr>
<td>Vapor Pressure at Daily Average Liquid (psia)</td>
<td>2.8611</td>
</tr>
<tr>
<td>Vapor Space Outage (ft²)</td>
<td>4.2523</td>
</tr>
</tbody>
</table>
### ATTACHMENT H (continued)

**Annual VOC Emissions from Sump Tank (T-Sump)**

<table>
<thead>
<tr>
<th>Working Losses (bbl)</th>
<th>Working Losses (bbl)</th>
<th>Vapor Molecular Weight (lb/mol)</th>
<th>Vapor Molecular Weight (lb/mol)</th>
<th>Vapor Molecular Weight (lb/mol)</th>
<th>Vapor Molecular Weight (lb/mol)</th>
<th>Vapor Molecular Weight (lb/mol)</th>
<th>Vapor Molecular Weight (lb/mol)</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.000000</td>
<td>0.000000</td>
<td>2.9811</td>
<td>2.9811</td>
<td>2.9811</td>
<td>2.9811</td>
<td>2.9811</td>
<td>2.9811</td>
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<tr>
<td>486.000,000</td>
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<td>90.0000</td>
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<tr>
<td>0.2842</td>
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<td>1,500,000</td>
<td>1,500,000</td>
<td>1,500,000</td>
<td>1,500,000</td>
<td>1,500,000</td>
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<tr>
<td>2,500,102</td>
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<td>9,0000</td>
<td>9,0000</td>
<td>9,0000</td>
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<tr>
<td>1,100,000</td>
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<td>6,0000</td>
<td>6,0000</td>
<td>6,0000</td>
<td>6,0000</td>
<td>6,0000</td>
<td>6,0000</td>
</tr>
<tr>
<td>669.2060</td>
<td>669.2060</td>
<td>90.0000</td>
<td>90.0000</td>
<td>90.0000</td>
<td>90.0000</td>
<td>90.0000</td>
<td>90.0000</td>
</tr>
</tbody>
</table>
**ATTACHMENT H (continued)**

Annual VOC Emissions from Sump Tank (T-Sump)

<table>
<thead>
<tr>
<th>Components</th>
<th>Emissions Rate (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gasoline</td>
<td>688.23</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total Emissions 688.23</td>
</tr>
</tbody>
</table>
The maximum design flow rate for the Oil-Water Separator is 16.8 (1000 gal/hr) or 147,168 (1000 gal/yr).

\[ E = Q \cdot EF \]

Where:
- \( E \) = VOC emissions rate (lb/hr)
- \( Q \) = maximum oil-water separator loading rate = 147,168 (1000 gal/yr)
- \( EF \) = Oil-water separator emission factor (lb total VOC/1000 gal wastewater); assumed to be 0.2 lb/1000 gal from U.S. EPA document AP-42, Table 9.1-2

\[ E = 147,168 \text{ (1000 gal/yr)} \times 0.2 \text{ lb/1000 gal} \times 1 \text{ ton/2000 lbs} = 14.7 \text{ tpy} \]
## ATTACHMENT J
### Individual HAP Worksheet

HAP Name: _____________________ CAS No.: _____________________

<table>
<thead>
<tr>
<th>A</th>
<th>B</th>
</tr>
</thead>
<tbody>
<tr>
<td>List materials that contain this HAP (Name, Type)</td>
<td>HAP emissions from Attachment I, column E (in Tons)</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
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<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**C** Total Individual HAP Emissions for this Month, Tons

**D** 12-Month Individual HAP Emissions Total F from Previous Month's Attachment J, Tons

**E** Monthly Individual HAP Emissions Total C from Previous 12 Month's Attachment J, Tons

**F** Current 12-month Total of HAP Emissions in Tons:

A. Individually list each material which emits this specific HAP.
B. Record the Individual HAP emissions already calculated for Attachment K in [Column E] in Tons;
C. Summation of Column B in Tons;
D. Record the previous 12-Month individual HAP emission total F from last month's Attachment H, in Tons;
E. Record the monthly HAP emission total C from previous 12-Month Attachment H, in Tons;
F. Calculate the new 12-month individual HAP emissions total. \( F = C + D - E \). A 12-Month individual HAP emissions total of less than 10.0 tons indicates compliance

Startup, Shutdown and malfunction emissions as reported to the Air Pollution Control Programs Compliance/Enforcement section during the most recent 12-month period must be included in the rolling total.
ATTACHMENT K
Monthly Combined HAP Compliance Worksheet

This sheet covers the month of ______________________ in the year ______________.

<table>
<thead>
<tr>
<th>A</th>
<th>B</th>
<th>C</th>
<th>D</th>
<th>E</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material Used, (Name, HAP CAS #)</td>
<td>Amount of Material Used (Include Units)</td>
<td>Density (lbs/gal)</td>
<td>HAP Content (Weight %)</td>
<td>HAP Emissions (Tons)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
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</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

F. Total HAP Emissions Calculated for this Month in Tons

G. 12-Month HAP Emissions Total from Previous Month’s Worksheet in Tons

H. Monthly HAP Emissions Total from Previous Year’s Worksheet in Tons

I. Current 12-month Total of HAP Emissions in Tons

A. Record the name of each material used that contains a HAP. Compare ingredient names and CAS to the Air Pollution Control Program Table of Hazardous Air Pollutants, Screening Model Action Levels, and Risk Assessment Levels, Revision 11 for confirmation as a HAP. The materials must match those on Attachment J.

B. Record the usage and units of the material. The usage must match Attachment J.

C. Record the material density

D. Record the HAP content from the SDS. If HAP content has a range, then use the highest value.

E. Calculate the HAP emissions;
   1. If the usage is in tons E = B x D;
   2. If usage is in pounds E = B x D / 2000;
   3. If usage is in gallons E = B x C x D / 2000.

F. Sum the individual E.

G. Record “I” from last month.

H. Record “F” from this month last year.

I. Current 12 month HAP emissions. I = (F + G – H). A total less than 25.0 tons indicates compliance.

Startup, Shutdown and malfunction emissions as reported to the Air Pollution Control Programs Compliance/Enforcement section during the most recent 12-month period must be included in the rolling tota
STATEMENT OF BASIS

INSTALLATION DESCRIPTION
Phillips 66 Pipeline, LLC - Jefferson City Products Terminal is a petroleum products and product additives distribution terminal in Jefferson City, MO. The main processes associated with this installation are the receipt, storage and distribution of propane, petroleum products and product additives. The terminal receives general (non-LPG) products such as gasoline and distillate fuel oil from a pipeline, stores the products in tanks, and uses a loading rack to load the products into tanker trucks for distribution to retail outlets such as gas stations. In addition, the terminal receives LPG (liquefied petroleum gas – propane or butane) from the pipeline, stores it in tanks, and uses a separate loading rack to load the LPG into tanker trucks for distribution. The facility has the ability to “re-originate” fuel, or send it from a tank back into the pipeline. Note: Different fuels are transported through pipelines in batches to the terminal. During the transportation of different products in the pipeline, the different products mix at the interface of the separate batches. This small volume of interface mixture is referred to as “transmix.” A tank may store either a specific fuel or transmix, but only stores one type of material at a time.

The gasoline and distillate fuel oil loading rack has a vapor processing system with a vapor combustion unit (VCU) to combust the vapors generated from the loading rack. The loading racks also have seven small tanks containing additives. These additives are blended with the petroleum product during the loading of a tank truck.

The facility collects spilled liquid in a rack sump at the loading rack. The rack sump has an oil/water separator. The oil from the separator is pumped into a transmix tank, and the water is pumped into a wastewater tank, from which it is taken offsite for disposal.

The facility has one 196 HP emergency diesel-fired pump and two 315 HP natural gas-fired pipeline pump engines.

The emissions of most concern are volatile organic compounds (VOC) and hazardous air pollutants (HAP). Smaller amounts of PM_{10}, SO_{x}, NO_{x}, and CO are also emitted. Some emissions come from the individual tanks, especially during roof landings. There are also emissions from the loading processes at the rack; from the VCU; from valves, seals, connectors, pump, etc.; and from miscellaneous smaller units such as the fire pump and pipeline pump engines.

The following equipment/tanks have been permanently removed from the facility:

- EP-03/T-4005 Gasoline Tank 4005
- T-AConoco Conoco Additive Tank
- T-AMeth Methanol Additive Tank
- PROVE Meter Proving Process
Potential and Reported Air Pollutant Emissions, tons per year

<table>
<thead>
<tr>
<th>Pollutants</th>
<th>Potential to Emit(^1)</th>
<th>2015</th>
<th>2014</th>
<th>2013</th>
<th>2012</th>
<th>2011</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nitrogen Oxides (NO\textsubscript{x})</td>
<td>40.45</td>
<td>21.41</td>
<td>21.58</td>
<td>28.01</td>
<td>22.26</td>
<td>25.31</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>94.01</td>
<td>27.13</td>
<td>20.43</td>
<td>27.54</td>
<td>26.24</td>
<td>26.47</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>70.23</td>
<td>36.44</td>
<td>36.70</td>
<td>48.79</td>
<td>39.14</td>
<td>44.19</td>
</tr>
<tr>
<td>Hazardous Air Pollutants(^2,3) (HAPs)</td>
<td>10/25</td>
<td>0.43</td>
<td>0.43</td>
<td>0.55</td>
<td>0.55</td>
<td>0.55</td>
</tr>
<tr>
<td>Particulate Matter (PM\textsubscript{10})</td>
<td>0.17</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

\(^1\) Each emission unit was evaluated at 8,760 hours of controlled annual operation, except for the emergency generator which was evaluated at 500 hours of uncontrolled annual operation.

\(^2\) The installation is limited by Permit Condition PW002 to:
- Less than 10 tons of any individual HAPs from the entire installation during any consecutive 12 month period.
- Less than 25 tons of HAPs in aggregate from the entire installation during any consecutive 12 month period.

\(^3\) The installation does emit HAPS; however, the installation reports most of their HAP emissions as VOCs or PM\textsubscript{10} as explained in 10 CSR 10-6.110 - Reporting Emission Data, Emission Fees, and Process Information.

**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) Part 70 Operating Permit Application, received August 15, 2014;
2) 2015 Emissions Inventory Questionnaire, received March 15, 2016;
4) Construction Permit 0695-025, issued June 21, 1995;
6) Construction Permit 1196-009, issued November 15, 1996;

**Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits**

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None

**Other Air Regulations Determined Not to Apply to the Operating Permit**

The Air Pollution Control Program (APCP) has determined the following requirements to not be 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.
10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* is not applicable to the installation and has not been applied within this permit. The only sources of visible air emissions at the installation are the emergency fire pump engine and pipeline pump engines which are exempt as internal combustion engines under 10 CSR 10-6.220(1)(A).

**Construction Permit History**

Construction Permit No. 0695-025, Issued June 21, 1995:
- This construction permit is for the installation of a gasoline additive tank and a diesel dye tank.

No Construction Permit Required Determination, Issued August 11, 1995:
- This no construction permit required determination is for the modification of a top loading to bottom loading rack.

Construction Permit No. 0197-015, Issued January 15, 1997:
- This construction permit is for the installation of a 2000 gallon gasoline additive tank.

Construction Permit No. 1296-013, Issued December 13, 1996:
- This construction permit is for the installation of an additive tank. This tank has been permanently removed from the facility, so is not included in this operating permit.

Construction Permit No. 1196-009, Issued November 15, 1996:
- This construction permit is for the installation of a diesel engine and storage tank.

No Construction Permit Required Determination, Issued September 4, 1996:
- This no construction permit required determination is for maintenance activities.

Construction Permit No. 0797-009, Issued July 8, 1997:
- This temporary construction permit is for the depressurization of 10 propane tanks.

No Construction Permit Required Determination, Issued November 17, 1998:
- This no construction permit required determination is for a new 1,034 gallon additive tank.

No Construction Permit Required Determination, Issued March 19, 2007:
- This no construction permit required determination is for an ethanol storage tank.

No Construction Permit Required Determination, Issued July 9, 2008:
- This no construction permit required determination is for a rack modification.

**New Source Performance Standards (NSPS) Applicability**

40 CFR Part 60 Subpart K, *Standards of Performance For Storage Vessels For Petroleum Liquids For Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior To May 19, 1978*, and 40 CFR Part 60 Subpart Ka, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23*, are not applicable to the storage tanks at this facility because either the petroleum liquid storage tanks at this facility were constructed prior to June 11, 1973, or if the tanks were constructed after June 11, 1973, they have storage capacities of less than 10,567 gallons.
40 CFR Part 60 Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 applies to EP-10, Denatured Ethanol Storage Tank 4007, and has been applied within this permit. This tank was installed in 2008 and stores up to 504,000 gallons of denatured ethanol. This tank is a fixed roof tank equipped with an internal floating roof.

40 CFR Part 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals
   a) This rule is applicable to EP-01 Petroleum Liquid Loading Rack and EP -22 VCU and EP-21 Facility-Wide Fugitive VOC Emissions from Seals, Valves, etc.
   b) This rule requires that the various records and notifications be kept for at least two (2) years. However, Part 70 operating permits regulations require records to be kept for a minimum of five (5) years.
   c) This rule is not applicable to EP-02 Propane Loading Rack because the rack’s construction was commenced before December 17, 1980.

Maximum Achievable Control Technology (MACT) Applicability
40 CFR 63, Subpart R—National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) this subpart does not apply to this facility as the facility is not a major source of HAPs.

This Subpart applies to this facility and has been applied within this permit. See Permit Condition 003. EP-10/T-4007 is considered in compliance with this subpart as this unit is subject to and complies with 40 CFR Part 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [§63.11087(f)]

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability
None

Compliance Assurance Monitoring (CAM) Applicability
40 CFR Part 64, Compliance Assurance Monitoring (CAM)
The CAM rule applies to each pollutant specific emission unit that:
   • Is subject to an emission limitation or standard, and
   • Uses a control device to achieve compliance, and
   • Has pre-control emissions that exceed or are equivalent to the major source threshold.

Emission Units EP-01, Petroleum Liquid Loading Rack and EP-22, VCU are subject to the emission limitations of 40 CFR Part 60 Subpart XX. Because the VCU is used to achieve compliance and the pre-control emissions exceed the major source threshold, these units are subject to CAM. The approved CAM conditions are included in Permit Condition EP-01 AND EP-22 – 001. A copy of the submitted CAM plan is included with this permit as Attachment D.

Greenhouse Gas Emissions
Note that this source may be subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO₂ emissions were not included within this permit. If the facility is required to report the data directly to EPA, the public may obtain CO₂ emissions data for this installation by visiting [http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html](http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html).

**Other Regulatory Determinations**

10 CSR 10-6.170 *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin* is applicable to the installation and has been applied within this permit. Potential PM₁₀ emissions from the installation are 0.17 tons per year; therefore, no monitoring, recordkeeping, or reporting is being required at this time.

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds; and*  
10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*

This regulation was marked as applicable in the application. On November 30, 2015 this regulation was rescinded and replaced with 10 CSR 10-6.261, Control of Sulfur Dioxide Emissions. However, 6.260 is still contained in the State Implementation Plan (SIP) and will continue to be an applicable requirement until removed from the SIP. This rule only applies to ENGINES - The Diesel Fire Pump Engine. The other engines at the facility, EP-14 - #1 Blue and EP-14 #2 Blue, are exempt under 10 CSR 10-6.260(1)(A)2 and 10 CSR 10-6.261(1)(A) as they exclusively combust pipeline grade natural gas.

**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 APCP'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).
Response to Public Comments

On May 23, 2017, Mr. Mark A. Smith, Chief of the Air Permitting and Compliance Branch of EPA Region 7, submitted seven comments. All comments are addressed in the order in which they appear within the letter(s).

Comment #01:
First, Plant Wide Permit Condition PW001 establishes a voluntary hazardous air pollutant (HAP) limitation, from the entire installation, of less than 10 tons of any individual HAP and less than 25 tons of combined HAP, in any consecutive 12-month period. Permit Condition PW001 indicates "when in compliance with all the emission unit-specific limitations in this permit, the permittee shall be assumed (emphasis added) to be in compliance with this plant-wide emission limitation." Permit Condition PW001, as drafted, may not be enforceable as a practical matter as there is no HAP monitoring in any of the emission unit-specific limitations nor an explanation in the Statement of Basis as to how the assumption that compliance with each emission unit-specific condition verifies compliance with the voluntary HAP limits. Additionally, plant-wide voluntary emission limitations, covering the entire installation, must include all (emphasis added) sources of the limited emissions; including insignificant sources and emissions from units without specific limitations. In its response to a petition filed against the Hu Honua Bioenergy Facility, the EPA granted the petitioners condition that the operating permit failed to ensure the enforceability, as a practical matter, because the permit was unclear whether all actual emissions were considered in determining compliance. Additionally, the EPA granted the petitioners claim that, for purposes of determining the potential to emit (PTE) of a stationary source, the PTE shall encompass the maximum capacity of a stationary source to emit pollutants under its physical and operational design. Thus emissions from all emission units that are part of the source's physical and operational design must be included in calculating PTE for purposes of determining voluntary compliance including emission units that have been designated as without limitations and any designated insignificant activity. Additionally, based on its response in the order granting in part a petition for objection to the operating permit for Yuhuang Chemical Company-Methanol Plant, EPA says that if a permit applicant agrees to restrict a facility's PTE, the source must include terms and conditions that are enforceable as a practical matter. In order for emissions limits to be enforceable as a practical matter, the permit must clearly specify how (emphasis added) emission will be determined or measured for demonstrating compliance with the limits. Therefore, EPA recommends MDNR reconsider the monitoring and record keeping associated with Plant-wide Permit Condition PW001.

Response to Comment:  Added attachments J and K to track individual and total HAPs.

Comment #02: Permit Condition Gasoline Tanks-002 appears to incorporate applicable requirements from 40 CFR Part 63, Subpart BBBBBB-National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities. Permit Condition Gasoline Tanks-002 references applicability to six (6) storage tanks: EP-04/f-4008; EP-05/f-4009; EP-06/f-4010; EP-08/f-4202; EP-09/f-4203; and EP-10/f-4007. The requirements included in Permit Condition Gasoline Tanks-002 are written for external floating roof tanks, yet, storage tank EP-10/f-4007 is described as having an internal floating roof. EPA suggests MDNR consider clarifying exactly which storage tank(s) are required to meet the draft permit condition requirements.
Response to Comment: EP-10/T-4007 is considered in compliance with this subpart as this unit is subject to and complies with 40 CFR Part 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [§63.11087(f)] so this has been removed from the permit condition.

Comment #03: Permit Condition EP-30-001 voluntarily limits the volatile organic compound (VOC) to no more than 36,000 pounds (18 tons) during tank roof landings and tank cleanings, in any consecutive 12-month period. Monitoring / Record keeping requirement 1) directs the permittee to maintain a record for tanks 4008, 4009, 4010, 4202 and 4203, identifying tank roof landings and date of degassing. Monitoring / Record keeping requirement 2) says "If the total number of tank roof landings for these six (emphasis added) tanks exceeds twelve (12) landings in any consecutive 12-month period and / or the total number of tank cleanings for these six (emphasis added) tanks exceeds six (6) cleanings in any consecutive 12- month period ..." Requirement 2) specifies six tanks, however Requirement 1) only identifies five tanks, therefore EPA recommends MDNR clarify whether or not the Tank Roof Landings / Tanks Cleanings involve five or six tanks.

Response to Comment: There should be six tanks listed. Added EP-10/T-4007 to the list in Requirement 1.

Comment #04: Permit Condition EP-01 AND EP-22-001 (Petroleum, Liquid Loading Rack and Vapor Combustion Unit (VCU)) incorporates applicable requirements from 40 CFR Part 60, Subpart XX-Standards of Performance for Bulk Gasoline Terminals. Permit Condition EP-01-003 incorporates applicable requirements from 40 CFR Part 63, Subpart BBBBBB-National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. In the Emission/Operational Limitations portion of Permit Condition EP-01-003, MDNR states the emission/operational limitations under 40 CFR Part 60, Subpart XX (Permit Condition EP-01 AND EP-22-001) are as stringent or more stringent than those of 40 CFR Part 63, Subpart BBBB. Therefore, if the facility is in compliance with Permit Condition EP-01 AND EP-22-001, then it will be in compliance with the emission and operational limitations of Permit Condition EP-01-003. It appears MDNR is attempting to "streamline" the requirements of 40 CFR Part 60, Subpart XX (NSPS) and the requirements of 40 CFR Part 63, Subpart BBBB (MACT) applicable to this facility. EPA's guidance regarding "streamlining" of applicable requirements are found in EPA's "White Paper #2 For Improved Implementation of the Part 70 Operating Permits Program" issued March 5, 1996. The basic principles of "streamlining" are:

- Most stringent requirement assures compliance with overlapping applicable requirements;
- Choose most stringent limit;
- Choose most assuring monitoring;
- Include record keeping and reporting associated with the "streamlined" monitoring requirement;
- Monitoring, record keeping and reporting to determine compliance with the subsumed limit(s) is not required ( emphasis added); and
- Citation of authority for streamlined condition should reference the authority for the streamlined limit and the authority of all subsumed applicable requirements.

Therefore, if MDNR is subsuming the requirements of 40 CFR Part 63, Subpart BBBB for the Petroleum Liquid Loading Rack (Permit Condition EP-01-003) into Permit Condition EP-01 AND
EP-22-001, then based on White Paper #2 guidance, there is no need for Permit Condition EP-01-003 because Permit Condition EP-01 AND EP-22-001 is more stringent; and the monitoring, record keeping and reporting to determine compliance with subsumed limits is not required. EPA suggests Permit Condition EP-01-003 is not required, however the authority citation for Permit Condition EP-01-003 should be included with Permit Condition EP-01 AND EP-22-001.

Response to Comment: These two permit conditions have been combined and Permit Condition EP-01-003 has been removed from the permit.

Comment #05: Permit Condition O/W SEP-001 and Permit Condition WW-001 are written identically and include an emission limit of less than 30,000 pounds (15.0 tons) of volatile organic compounds (VOC) in any consecutive 12-month period. Permit Condition O/W SEP-001 indicates the permittee is assumed to be in compliance and refers to Attachment I for the calculation of the potential to emit VOC. Permit Condition WW-001 indicates the permittee is assumed to be in compliance and refers to Attachment H for the calculation of the potential to emit VOC. Attachment H and Attachment I are also identical and both show the permittee is in compliance with the VOC emission limit, provided wastewater flow is equal to or less than 147,168,000 gallons per year. Therefore, EPA believes that wastewater flow monitoring is the measure the permittee should be using to verify compliance. Permit Condition O/W SEP-001 and Permit Condition WW-001 indicate that the permittee has a maximum wastewater flow rate, however it is unclear in this draft operating permit how their wastewater flow is limited. EPA recommends MDNR consider combining Permit Condition O/W SEP-001 and Permit Condition WW-001 into one permit condition and also consider wastewater flow monitoring to verify compliance. If there is a factor which limits wastewater flow, the Statement of Basis should present the facts to show this limit.

Response to Comment: These two permit conditions have been combined.

Comment #06: Permit Condition Engines-002 incorporates applicable requirements from 10 CSR 10-6.261, which has not yet been incorporated into the Missouri State Implementation Plan (SIP), and therefore, is a "State Only" requirement. EPA suggests MDNR consider indicating the Permit Condition Engines-002 is "State Only."

Response to Comment: A footnote has been added that states 10-6.261 is a State Only requirement.

Comment #07: Permit Condition Engines-003 incorporates applicable requirements from 40 CFR Part 63, Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. Reporting requirements direct the permittee to report deviations as directed in Section V of this operating permit. However, Phillips 66 Pipeline, LLC is an area source of hazardous air pollutants (HAP) and per 10 CSR 10-6.075, MDNR relies on EPA for compliance verification. Therefore, it would seem more appropriate for deviation reports to be submitted to the Missouri Air Compliance Coordinator at EPA Region 7.

Response to Comment: This has been corrected.
JUL 1 7 2017

Mr. David Soukup
Phillips 66 Pipeline, LLC
2116 Idlewood Road
Jefferson City, MO 65110

Re: Phillips 66 Pipeline, LLC, 051-0042
Permit Number: OP2017-056

Dear Mr. Soukup:

Enclosed with this letter is your Part 70 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 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

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:kbj

Enclosures

c: PAMS File: 2014-12-033

Recycled paper