



Missouri Department of Natural Resources
Air Pollution Control Program

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: ~~OP2011-040~~
Expiration Date: ~~AUG 29 2016~~
Installation ID: 201-0018
Project Number: 2004-10-072

Installation Name and Address

Cape Girardeau Terminal
10653 State Highway North
Scott City, MO 63780
Scott County, S34, T30N, R14E

Parent Company's Name and Address

Enterprise Refined Products Company, LLC
1100 Louisiana Street
Houston, TX 77210

Installation Description:

The Cape Girardeau Terminal (CGT) is a petroleum products pipeline terminal in a system that extends from Texas to New York. The CGT is comprised of eleven large petroleum storage tanks, several smaller tanks for storage of petroleum additives, and dyes and a six bay truck loading rack with a vapor recovery unit consisting of a carbon bed volatile organic compound adsorption system.

AUG 30 2011

Effective Date



Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

The Cape Girardeau Terminal (CGT) is a petroleum products pipeline terminal in a system that extends from Texas to New York. The CGT is comprised of fourteen Gasoline additive, diesel additive and diesel dye or ethanol holding tanks or equipment gasoline tanks or fire pump diesel tanks and a six bay truck loading rack with a vapor recovery unit consisting of a carbon bed volatile organic compound adsorption system.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2009	2008	2007	2006	2005
Particulate Matter ≤ Ten Microns (PM ₁₀)	0	0	0	0	0
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0	0	0	0	0
Sulfur Oxides (SO _x)	0	0	0	0	0
Nitrogen Oxides (NO _x)	0	0	0	0	0
Volatile Organic Compounds(VOC)	28.48	29.8438	28.4131	34.5112	34.951
Carbon Monoxide (CO)	0	0	0	0	0
Lead (Pb)	0	0	0	0	0
Hazardous Air Pollutants (HAPs)	0	0	4.6028	0	0
Ammonia (NH ₃)	0	0	0	0	0

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.

Emission Unit Number	EIQ Emission Point	Description
EU0010		Fire Pump Engine
EU0020		Emergency Generator
EU0050	EP3	Truck Loading Rack #3 with Vapor Recovery Unit
EU1901	EP1	Gasoline storage tank
EU1902	EP1 and EP6	Gasoline and distillate storage tank
EU1905	EP1	Gasoline storage tank
EU1906	EP1	Gasoline storage tank
EU1907	EP6	Distillate storage tank
EU1908	EP1	Gasoline storage tank
EU1909	EP1	Ethanol storage tank
EU1961	EP6	Transmix storage tank
EU1962	EP1	Transmix storage tank

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source

Tank 1903 (EIQ emission point EP1) 1,680,000 Gallon Fixed Roof Gasoline Tank
Tank 1904 (EIQ emission point EP1) 1,680,000 Gallon Fixed Roof Gasoline Tank
EUROOF Roof landings due to maintenance, startup, shutdown, and seasonal RVP blend change
10,000 Gallon IVD Gasoline Additive Tank
Nine Gasoline Additive, Diesel Additive and Diesel dye tanks
Fire pump diesel tank capacity in gallons: 75 gal
Equipment gasoline and diesel tank capacity in gallons: 550 gallons
Antistatic: Two 500 gal totes
Ethanol holding tanks: 160 gallons
Oil Water Separator: OWS is exempt since the VOC % is less than 1%.

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Construction Permit 0692-024, issued June 30, 1992
- 2) Construction Permit 102000-034, issued October 27, 2000
- 3) Construction Permit 032004-019, issued March 17, 2004

II. Emission Unit Specific Emission 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.

PERMIT CONDITION PW001

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart A General Provisions and *Subpart BBBBBB* National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities
10 CSR 10-6.070 New Source Performance Regulations
40 CFR Part 60, Subpart A General Provisions and *Subpart XX* Standards of Performance for Bulk Gasoline Terminals

Emission / Operational Limitation:

- 1) The permittee shall perform a monthly leak inspection of all equipment in gasoline service for total organic compounds liquid or vapor leaks. For this inspection, detection methods incorporating sight, sound, and smell are acceptable.
 - a) As defined in 40 CFR 63.11100 and 40 CFR 60.502(j), the equipment to be inspected includes:
 - i) Each valve, pump, pressure relief device, sampling connection system, open-ended valve or line, and flange or other connector in the gasoline liquid transfer and vapor collection systems.
 - ii) The entire vapor processing system except the exhaust port(s) or stack(s).
 - iii) The loading racks used to handle gasoline.
 - b) As required by 40 CFR 60.502(j), the vapor processing system and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks.
 - c) As defined in 40 CFR 63.11100, "in gasoline service" means that the equipment is used in a system that transfers gasoline or gasoline vapors.
- 2) When a leak is detected, the permittee shall make an initial attempt at repair as soon as practicable, but no later than five calendar days after the leak is detected.
- 3) The permittee shall complete repair or replacement of leaking equipment within 15 calendar days after detection of each leak, except as provided in Paragraph [4] below.
- 4) Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The permittee must document the reason(s) why the repair was not feasible and the date each repair was completed as described under Monitoring / Recordkeeping Requirements and include the event on the semi-annual excess emissions report described in Reporting.
- 5) As an alternative to compliance with the provisions in Paragraphs (a) through (d) of this section, the permittee may implement an instrument leak monitoring program that has been demonstrated to the Director as at least equivalent.

Monitoring / Recordkeeping Requirements:

- 1) The permittee shall prepare and maintain an up-to-date logbook which contains the following information for all equipment in gasoline service:
 - a) A list, summary description, or diagram(s) showing the type, identification number, and location of all equipment in gasoline service;
 - b) All completed and signed leak inspection reports; and
 - c) A record of maintenance and repairs.

- d) If the permittee elects to implement an instrument monitoring program to comply with the rule, the logbook shall also contain a full description of the monitoring program.
- 2) The permittee shall record the following information for each monthly leak inspection:
 - a) Date of inspection.
 - b) The equipment type and identification number;
 - c) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak). Each finding shall be recorded in the logbook.
 - d) The leak determination method (i.e., sight, sound, or smell).
 - e) If a leak is identified, the permittee must also record the following:
 - i) The nature of the leak (i.e., vapor or liquid)
 - ii) The date of each attempt to repair the leak
 - iii) Repair methods applied in each attempt to repair the leak;
 - iv) "Repair delayed" and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak;
 - v) The expected date of successful repair of the leak if the leak is not repaired within 15 days; and
 - vi) The date of successful repair of the leak.
 - f) The name and signature of the person completing the inspection.
- 3) An authorized representative of the permittee shall sign the inspection record at the completion of each inspection.
- 4) Attachment D (Leak Inspection Log Sheet) and Attachment E (Inspection, Maintenance, Repair and Malfunction Log) contain logs satisfying these recordkeeping requirements. These logs, or equivalent(s) created by the permittee, must be used to certify compliance with this requirement.
- 5) The permittee shall maintain all records of inspections, maintenance, repairs, and notifications onsite for a minimum of five years.
- 6) The permittee shall immediately make such records available to Missouri Department of Natural Resources' personnel upon request.

Reporting Requirements:

- 1) The permittee shall submit a semi-annual excess emissions report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, at the time the semi-annual compliance report is submitted. Each occurrence of an equipment leak for which no repair attempt was made within five days or for which repair was not completed within 15 days after detection is an excess emission event. The following information shall be included in the excess emissions report, as applicable:
 - a) The number of equipment leaks not repaired within 15 days after detection.
 - b) For each occurrence of an equipment leak for which no repair attempt was made within five days or for which repair was not completed within 15 days after detection:
 - i) The date on which the leak was detected;
 - ii) The date of each attempt to repair the leak;
 - iii) The reasons for the delay of repair; and
 - iv) The date of successful repair.
- 2) Reports of any deviations from the monitoring, record keeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and 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.

EU0010 – Fire Pump Engine	
Emission Unit	Description
EU0010	Fire Pump Engine; 120 HP, installed 2010

EU0020 – Emergency Generator	
Emission Unit	Description
EU0020	Emergency Generator; 18 HP

<p style="text-align: center;">PERMIT CONDITION EU0010 – 001 10 CSR 10-6.070 New Source Performance Regulations 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines</p>
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Standards:

- 1) The permittee shall comply with the emission standards in Table 4 to this subpart, for all pollutants. [§60.4205(c)]
- 2) The permittee shall operate and maintain stationary combustion ignition (CI) ignition internal combustion (ICE) that achieve the emission standards as required in §60.4205(c) according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer, over the entire life of the engine. [§60.4206]
- 3) Beginning October 1, 2007, the permittee shall use diesel fuel that meets the requirements of 40 CFR 80.510(a). [§60.4207(a)]
- 4) Beginning October 1, 2010, the permittee shall use diesel fuel that meets the requirements of 40 CFR 80.510(b) for non-road diesel fuel. [§60.4207(b)]
- 5) The permittee may petition the Administrator for approval to use remaining non-compliant fuel that does not meet the fuel requirements of §60.4207(a) and (b) beyond the dates required for the purpose of using up existing fuel inventories. If approved, the petition will be valid for a period of up to six months. If additional time is needed, the permittee is required to submit a new petition to the Administrator. [§60.4207(c)]
- 6) The permittee shall install a non-resettable hour meter prior to start-up of the engine. [§60.4209(a)]
- 7) The permittee shall operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's written instructions or procedures developed by the permittee that are approved by the engine manufacturer. In addition, the permittee may only change those settings that are permitted by the manufacturer. The permittee shall also meet the requirements of 40 CFR Parts 89, 94 and/or 1068, as they apply. [§60.4211(a)]
- 8) Emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. Anyone 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 ICE beyond 100 hours per year. Any operation other than emergency operation, and maintenance and testing as permitted in this section, is prohibited. [§60.4211(e)]

Table 4 to Subpart IIII of Part 60 — *Emission Standards for Stationary Fire Pump Engines*

[As stated in §60.4205(c), the permittee must comply with the following emission standards for stationary fire pump engines]

Maximum engine power	Model year(s)	Emission Standards g/KW-hr (g/HP-hr)		
		NMHC + NO _x	CO	PM
75≤KW<130 (100≤HP<175)	2009 and earlier	10.5 (7.8)	5.0 (3.7)	0.80 (0.60)
	2010+ ²	4.0 (3.0)		0.30 (0.22)

Compliance Methods:

- 1) The permittee shall demonstrate compliance according to one of the following methods: [60.4211(b)]
 - a) Purchasing an engine certified according to 40 CFR Part 89 or 40 CFR Part 94, as applicable, for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's specifications. [§60.4211(b)(1)]
 - b) Keeping records of performance test results for each pollutant for a test conducted on a similar engine. The test must have been conducted using the same methods specified in this subpart and these methods must have been followed correctly. [§60.4211(b)(2)]
 - c) Keeping records of engine manufacturer data indicating compliance with the standards. [§60.4211(b)(3)]
 - d) Keeping records of control device vendor data indicating compliance with the standards. [§60.4211(b)(4)]
 - e) Conducting an initial performance test to demonstrate compliance with the emission standards according to the following requirements: [§60.4211(b)(5)]
 - i) The performance test must be conducted according to the in-use testing procedures in 40 CFR Part 1039, Subpart F. [60.4212(a)]
 - ii) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR Part 1039 must not exceed the not-to-exceed (NTE) standards for the same model year and maximum engine power as required in 40 CFR 1039.101(e) and 40 CFR 1039.102(g)(1), except as specified in 40 CFR 1039.104(d). This requirement starts when NTE requirements take effect for nonroad diesel engines under 40 CFR Part 1039. [60.4212(b)]
 - iii) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8, as applicable, must not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in 40 CFR 89.112 or 40 CFR 94.8, as applicable, determined from the following equation:

$$\text{NTE requirement for each pollutant} = (1.25) \times (\text{STD}) \quad \text{Equation 1}$$

Where:

STD = The standard specified for that pollutant in 40 CFR 89.112 or 40 CFR 94.8, as applicable. Alternatively, stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8 may follow the testing procedures specified in §60.4213 of this subpart, as appropriate. [60.4212(c)]

- iv) Exhaust emissions from stationary CI ICE that are complying with the emission standards for pre-2007 model year engines in §60.4205(c) must not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in §60.4205(c), determined from the Equation 1.

Where:

STD = The standard specified for that pollutant in §60.4205(c). Alternatively, stationary CI ICE that are complying with the emission standards for pre-2007 model year engines in §60.4205(c) may follow the testing procedures specified in §60.4213, as appropriate. [60.4212(d)]

Recordkeeping:

- 1) The permittee shall maintain the following records: [60.4214(a)(2)]
 - a) All notifications submitted to comply with this subpart and all documentation supporting any notification. [60.4214(a)(2)(i)]
 - b) Maintenance conducted on the engine. [60.4214(a)(2)(ii)]
 - c) If the stationary CI internal combustion is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards. [60.4214(a)(2)(iii)]
 - d) If the stationary CI internal combustion is not a certified engine, documentation that the engine meets the emission standards. [60.4214(a)(2)(iv)]
- 2) The permittee is not required to submit an initial notification. The permittee shall maintain records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee shall record the time of operation of the engine and the reason the engine was in operation during that time. [60.4214(b)]
- 3) If the stationary CI internal combustion engine is equipped with a diesel particulate filter, the permittee shall maintain records of any corrective action taken after the backpressure monitor has notified permittee that the high backpressure limit of the engine is approached. [60.4214(c)]
- 4) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 5) All records shall be maintained for five (5) years.

Reporting:

The permittee shall report any deviations from the standards, compliance methods, 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 EU0010 and EU0020– 001 10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

Emission Limitations:

- 1) The permittee shall not emit more than five hundred part per million by volume (500 ppmv) of sulfur dioxide or more than thirty-five milligrams per cubic meter (35 mg/m³) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three (3)-hour time period.
- 2) No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards:¹

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO ₂)	0.5 ppm (1300 µg/m ³)	3-hour average not to be exceeded more than once per year
	75 ppb	1-hour average; 3-year average of the 99 th percentile of the daily maximum 1-hour average at each site monitor within an area
Hydrogen Sulfide (H ₂ S)	0.05 ppm (70 µg/m ³)	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 µg/m ³)	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H ₂ SO ₄)	10 µg/m ³	24-hour average not to be exceeded more than once in any 90 consecutive days
	30 µg/m ³	1-hour average not to be exceeded more than once in any 2 consecutive days

¹This requirement is not federally enforceable. This requirement can only be directly enforced by the State of Missouri.

Operational Limitation:

These emission units shall only combust Fuel Oil Nos. 1 and 2 containing no more than 0.5 percent sulfur.

Monitoring/Record Keeping:

- 1) The permittee shall maintain fuel purchase receipts indicating the sulfur content of the fuel oil.
- 2) The permittee shall maintain records of any equipment malfunctions, using Attachment D or an equivalent form generated by the permittee.
- 3) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 4) All records shall be maintained for five (5) years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
- 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 EU0010 and EU0020 – 002
 10 CSR 10-6.061 Construction Permit Exemptions

Operational Limitation:

Internal Combustion Engines used only for portable or emergency services, provided that the maximum annual operating hours shall not exceed five hundred (500) hours. Emergency generators are exempt from construction permitting only if their sole function is to provide back-up power when electric power from local utility is interrupted. This exemption applies only if the emergency generators are operated only during emergency situations and for short periods of time to perform maintenance and operational readiness testing. The emergency generator shall be equipped with a non-resettable meter. [10CSR 10-6.061(3)(BB)]

EU0050 – Truck Loading Rack #3 with Vapor Recovery Unit		
Emission Unit	Description	2009 EIQ Reference #
EU0050	Six bay truck loading rack with vapor recovery unit	EP5

<p align="center">PERMIT CONDITION EU0050-001 10 CSR 10-6.070 New Source Performance Regulations 40 CFR Part 60, Subpart A General Provisions and Subpart XX Standards of Performance for Bulk Gasoline Terminals</p>
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Emission Limitation:

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)]

Equipment Specification/Operational Specification:

- 1) The permittee shall comply with the requirements. [§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) 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)]
 - c) Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures: [§60.502(e)]
 - i) The permittee shall obtain the vapor tightness documentation described in §60.505(b) for each gasoline tank truck which is to be loaded at the affected facility. [§60.502(e)(1)]
 - ii) 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)]
 - iii) The permittee shall cross-check each tank identification number obtained in §60.502(e)(2) with the file of tank vapor tightness documentation within two weeks after the corresponding tank is loaded, unless either of the following conditions is maintained: [§60.502(e)(3)(i)]
 - (1) 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)]
 - (2) 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 semi-annually. [§60.502(e)(3)(i)(B)]
 - (3) If either the quarterly or semi-annual cross-check provided in §60.502(e)(3)(i)(A) through (B) reveals that these conditions were not maintained, the source must return to bi-weekly monitoring until such time as these conditions are again met. [§60.502(e)(3)(ii)]
 - iv) The permittee shall notify the owner or operator of each non-vapor-tight gasoline tank truck loaded at the affected facility within one week of the documentation cross-check in §60.502(e)(3). [§60.502(e)(4)]
 - v) The permittee shall take steps assuring that the non vapor-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)]
 - vi) Alternate procedures to those described in §60.502(e)(1) through (5) for limiting gasoline tank truck loadings may be used upon application to, and approval by, the Director. [§60.502(e)(6)]

- d) 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)]
- e) 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)]
- f) 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)]
 - i) 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)]
 - ii) 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)]
- g) 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)]

Monitoring:

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 §60.502(j), 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) The tank truck vapor tightness documentation required under §60.502(e)(1) 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, as 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 five minutes, mm of water (average for 2 runs). [§60.505(b)(8)]
- 3) A record of each monthly leak inspection required under §60.502(j) shall be kept on file at the terminal for at least five 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)]
- 4) The permittee shall keep documentation of all notifications required under §60.502(e)(4) on file at the terminal for at least five years. [§60.505(d)]
- 5) As an alternative to keeping records at the terminal of each gasoline cargo tank test result as required in §60.502(a), and (d), the permittee may comply with the requirements in either §60.502(e)(1) or (2). [§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 in §60.502(e)(1) 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 with §60.502(e)(1). [§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 in §60.502(e)(2) 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 with §60.502(e)(2). [§60.505(e)(2)(ii)]
- 6) The permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least five years. [§60.505(f)]

Reporting:

- 1) The permittee shall submit to the Director a written report of the results of each performance test on the vapor processing system required by §60.503(a). [§60.503 (a) and §60.8]
- 2) The permittee shall notify the owner or operator of each non-vapor-tight gasoline tank truck loaded at the facility within one week of the documentation crosscheck in §60.502(e)(3). [§60.502(e)(4)]
- 3) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

PERMIT CONDITION EU0050-002

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

Emission Limitation/Operational Specification:

The emission limit and management practices in Permit Condition EU0050-002 are as stringent as or more stringent than those contained in 40 CFR Part 60 Subpart XX. Therefore, there are no additional emission limitations or operational specifications.

Testing:

- 1) Based on the emission limit established in Permit Condition EU0050-001, the permittee may submit a statement by a responsible official certifying the compliance status of the loading rack in lieu of the test required under §63.11092(a)(1). [§63.11092(a)(2)]
- 2) If the permittee has chosen to submit a statement by a responsible official certifying the compliance status of the loading rack in lieu of the test required under §63.11092(a)(1), the monitored operating parameter value may be determined according to the provisions in §63.11092(b)(5)(i) or §63.11092(b)(5)(ii). [§63.11092(b)(5)]
 - a) Monitor an operating parameter that has been approved by the Director and is specified in your facility's current enforceable operating permit. At the time that the Director requires a new performance test, you must determine the monitored operating parameter value according to the requirements specified in §63.11092(b). [§63.11092(b)(5)(i)]
 - b) Determine an operating parameter value based on engineering assessment and the manufacturer's recommendation and submit the information specified below in §63.11092(b)(4) for approval by the Director. At the time that the Director requires a new performance test, you must determine the monitored operating parameter value according to the requirements specified in §63.11092(b). [§63.11092(b)(5)(ii)]
 - i) Provide for the Director's approval the rationale for the selected operating parameter value, monitoring frequency, and averaging time, including data and calculations used to develop the value and a description of why the value, monitoring frequency, and averaging time demonstrate continuous compliance with the emission standard in §63.11088(a). [§63.11092(b)(4)]
- 3) For performance tests performed after the initial test required under §63.11092(a), the permittee shall document the reasons for any change in the operating parameter value since the previous performance test. [§63.11092(c)]
- 4) The annual certification test for gasoline cargo tanks shall consist of the test method specified in §63.11092(f)(1). [§63.11092(f)]
 - a) *EPA Method 27, Appendix A-8, 40 CFR Part 60.* Conduct the test using a time period (t) for the pressure and vacuum tests of 5 minutes. The initial pressure (P_i) for the pressure test shall be 460 millimeters (mm) of water (18 inches of water), gauge. The initial vacuum (V_i) for the vacuum test shall be 150 mm of water (6 inches of water), gauge. The maximum allowable pressure and vacuum changes (Δp , Δv) for all affected gasoline cargo tanks is three inches of water, or less, in five minutes. [§63.11092(f)(1)]

Monitoring:

- 1) The permittee 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 five 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, except as provided in §63.11089(d). [§63.11089(c)]
- 3) Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The owner or operator shall provide in the semi-annual report specified in §63.11095(b), the reason(s) why the repair was not feasible and the date each repair was completed. [§63.11089(d)]
- 4) The permittee shall operate the vapor processing system in a manner not to exceed or not to go below, as appropriate, the alternative operating parameter value. [§63.11092(d)(2)]
- 5) Operation of the vapor processing system in a manner exceeding or going below the operating parameter value, as appropriate, shall constitute a violation of the emission standard in §63.11088(a). [§63.11092(d)(3)]

- 6) If the owner or operator chooses to monitor using §63.11092 (b) (1) (i) (B) as an alternative to a continuous emissions monitoring system (§63.11092 (b)(1)(i)(A)), then: §63.11092(d)(4) states for the monitoring and inspection, as required under Paragraphs (b)(1)(i)(B)(2) and (b)(1)(iii)(B)(2) of this section, malfunctions that are discovered shall not constitute a violation of the emission standard in §63.11088(a) if corrective actions as described in the monitoring and inspection plan are followed. The owner or operator must:
- Initiate corrective action to determine the cause of the problem within one hour;
 - Initiate corrective action to fix the problem within 24 hours;
 - Complete all corrective actions needed to fix the problem as soon as practicable consistent with good air pollution control practices for minimizing emissions;
 - Minimize periods of start-up, shutdown, or malfunction; and
 - Take any necessary corrective actions to restore normal operation and prevent the recurrence of the cause of the problem

Recordkeeping:

- Monthly Leak Inspection.* A monthly leak inspection 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)]
- Each detection of a liquid or vapor leak shall be recorded in the log book. [§63.11089(c)]
- The permittee shall record in the log book for each leak that is detected the information specified in §63.11094(e)(1) through (7). [§63.11094(e)]
 - The equipment type and identification number. [§63.11094(e)(1)]
 - The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell). [§63.11094(e)(2)]
 - The date the leak was detected and the date of each attempt to repair the leak. [§63.11094(e)(3)]
 - Repair methods applied in each attempt to repair the leak. [§63.11094(e)(4)]
 - “Repair delayed” and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak. [§63.11094(e)(5)]
 - The expected date of successful repair of the leak if the leak is not repaired within 15 days. [§63.11094(e)(6)]
 - The date of successful repair of the leak. [§63.11094(e)(7)]
- Gasoline Cargo Tank Loading.* The permittee shall keep records of the test results for each gasoline cargo tank loading at the facility as specified in §63.11094(b)(1) and (2). [§63.11094(b)]
 - Annual certification testing performed under §63.11092(f)(1) . [§63.11094(b)(1)]
 - The documentation file shall be kept up-to-date for each gasoline cargo tank loading at the facility. The documentation for each test shall include, as a minimum, the following information: [§63.11094(b)(2)]
 - Name of test:* Annual Certification Test—Method 27. [§63.11094(b)(2)(i)]
 - Cargo tank owner's name and address. [§63.11094(b)(2)(ii)]
 - Cargo tank identification number. [§63.11094(b)(2)(iii)]
 - Test location and date. [§63.11094(b)(2)(iv)]
 - Tester name and signature. [§63.11094(b)(2)(v)]
 - Witnessing inspector, if any:* Name, signature, and affiliation. [§63.11094(b)(2)(vi)]
 - Vapor tightness repair:* Nature of repair work and when performed in relation to vapor tightness testing. [§63.11094(b)(2)(vii)]
 - Test results:* Test pressure; pressure or vacuum change, mm of water; time period of test; number of leaks found with instrument; and leak definition. [§63.11094(b)(2)(viii)]

- 5) As an alternative to keeping records at the terminal of each gasoline cargo tank test result as required in §63.11094(b), the permittee may comply with the requirements in either §63.11094(c)(1) or §63.11094(c)(2). [§63.11094(c)]
 - a) An electronic copy of each record is instantly available at the terminal. [§63.11094(c)(1)]
 - i) The copy of each record in §63.11094(c)(1) is an exact duplicate image of the original paper record with certifying signatures. [§63.11094(c)(1)(i)]
 - ii) The Director is notified in writing that each terminal using this alternative is in compliance with §63.11094(c)(1). [§63.11094(c)(1)(ii)]
 - b) For facilities that use 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 the Director's delegated representatives during the course of a site visit, or within a mutually agreeable time frame. [§63.11094(c)(2)]
 - i) The copy of each record in §63.11094(c)(2) is an exact duplicate image of the original paper record with certifying signatures. [§63.11094(c)(2)(i)]
 - ii) The Administrator is notified in writing that each terminal using this alternative is in compliance with §63.11094(c)(2). [§63.11094(c)(2)(ii)]
- 6) 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)]
- 7) The permittee shall keep an up-to-date, readily accessible record of the continuous monitoring data required under §63.11092(b). This record shall indicate the time intervals during which loadings of gasoline cargo tanks have occurred or, alternatively, shall record the operating parameter data only during such loadings. The date and time of day shall also be indicated at reasonable intervals on this record. [§63.11094(f)(1)]
- 8) The permittee shall record and report simultaneously with the Notification of Compliance Status required under §63.11093(b): [§63.11094(f)(2)]
 - a) All data and calculations, engineering assessments, and manufacturer's recommendations used in determining the operating parameter value under §63.11092(b). [§63.11094(f)(2)(i)]
- 9) If the permittee requests approval to use a vapor processing system or monitor an operating parameter other than those specified in §63.11092(b), the permittee shall submit a description of planned reporting and recordkeeping procedures. [§63.11094(f)(5)]

Reporting:

- 1) *Initial Notification.* The permittee must submit an Initial Notification as specified in §63.9(b). If the facility is in compliance with the requirements of Subpart BBBBBB at the time the Initial Notification is due, the Notification of Compliance Status required under §63.11093(b) may be submitted in lieu of the Initial Notification. [§63.11093(a)]
- 2) *Notification of Compliance Status.* The permittee must submit a Notification of Compliance Status as specified in §63.9(h). [§63.11093(b)]
- 3) *Notification of Performance Test.* The permittee must submit a Notification of Performance Test, as specified in §63.9(e), prior to initiating testing required by §63.11092(a) or §63.11092(b). [§63.11093(c)]
- 4) The permittee must submit additional notifications specified in §63.9, as applicable. [§63.11093(d)]
- 5) *Semi-annual Compliance Report.* The permittee shall include in a semi-annual compliance report to the Director the following information, as applicable: [§63.11095(a)]
 - a) For loading racks, each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility. [§63.11095(a)(2)]
 - b) For equipment leak inspections, the number of equipment leaks not repaired within 15 days after detection. [§63.11095(a)(3)]

- 6) *Excess Emissions Report.* The permittee shall submit an excess emissions report to the Director at the time the semi-annual compliance report is submitted. Excess emissions events under Subpart BBBBBB, and the information to be included in the excess emissions report, are specified in §63.11095(b)(1) through (5). [§63.11095(b)]
- a) Each instance of a non-vapor-tight gasoline cargo tank loading at the facility in which the owner or operator failed to take steps to assure that such cargo tank would not be reloaded at the facility before vapor tightness documentation for that cargo tank was obtained. [§63.11095(b)(1)]
 - b) Each reloading of a non-vapor-tight gasoline cargo tank at the facility before vapor tightness documentation for that cargo tank is obtained by the facility in accordance with §63.11094(b). [§63.11095(b)(2)]
 - c) Each exceedance or failure to maintain, as appropriate, the monitored operating parameter value determined under §63.11092(b). The report shall include the monitoring data for the days on which exceedances or failures to maintain have occurred, and a description and timing of the steps taken to repair or perform maintenance on the vapor collection and processing systems or the CMS. [§63.11095(b)(3)]
 - d) For each occurrence of an equipment leak for which no repair attempt was made within five days or for which repair was not completed within 15 days after detection: [§63.11095(b)(5)]
 - i) The date on which the leak was detected; [§63.11095(b)(5)(i)]
 - ii) The date of each attempt to repair the leak; [§63.11095(b)(5)(ii)]
 - iii) The reasons for the delay of repair; and [§63.11095(b)(5)(iii)]
 - iv) The date of successful repair. [§63.11095(b)(5)(iv)]

EU1901, EU1902, EU1905, AND EU1908 – External Floating Roof Petroleum Storage Tank External Floating Roof Petroleum Storage Tanks with greater than or equal to 75 cubic meters storage capacity		
Emission Unit	Description	2009 EIQ Reference #
EU1901	Tank # 1901: 2,940,000 gallon domed external floating roof tank, installed 1957	EP1
EU1902	Tank # 1902: 1,680,000 gallon domed external floating roof tank, installed 1957	EP1, EP6
EU1905	Tank # 1905: 1,680,000 gallon domed external floating roof tank, installed 1961	EP1
EU1908	Tank # 1908: 3,906,000 gallon domed external floating roof tank, installed 1960's	EP1

PERMIT CONDITION (EU1901, EU1902, EU1905, and EU1908)-001
 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
 40 CFR Part 63, Subpart A General Provisions and Subpart BBBBBB National Emission Standards
 for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants,
 and Pipeline Facilities

Emission / Operational Limitations:

- 1) The permittee shall control emissions from EU1901, EU1902, EU1905, and EU1908 (Tanks #1901, 1902, 1905, and 1908) gasoline storage vessels with a design capacity greater than or equal to 75 m³ in accordance with the applicable provisions of 40 CFR Part 63, Subpart BBBBBB, Table 1.

- 2) The permittee shall continue to control emissions from EU1901, EU1902, EU1905, and EU1908 using the specified floating roofs and seals for external floating roofs described in 40 CFR Part 60 Subpart Kb. The permittee may elect to use the specified floating roofs and seals described in 40 CFR Part 63 Subpart WW or a closed vent system and control device as listed in the table below.

Compliance Method	Additional Permit Conditions
Closed Vent System and Control Device to reduce emissions by 95%	Attachment G-1
40 CFR 60 Subpart Kb Requirements for Internal Floating Roof Tanks	Attachment G-2
40 CFR 63 Subpart WW Requirements for External Floating Roof Tanks	Attachment G-4

- 3) If the permittee elects an alternate method of compliance, the permittee shall meet the specific Equipment/Procedural Requirements, Monitoring/Recordkeeping Requirements, and Reporting Requirements listed in Attachment G-1, G-2, or G-4 that apply to the control method selected in lieu of those presented below.
- 4) The permittee shall ensure that EU1901, EU1902, EU1905, and EU1908 are in compliance with a selected control method by January 10, 2011, with the following exception:
- a) Any storage tank that is equipped with a floating roof and that does not currently meet the applicable emission requirement or management standard listed in the table above must be in compliance at the first degassing and cleaning activity after January 10, 2011 or by January 10, 2018, whichever is first.

Equipment / Procedural Requirements:

- 1) External Floating Roof, §63.11092(e) and §60.112b(a)(2):
- a) The permittee shall ensure that EU1901, EU1902, EU1905, and EU1908 external floating roof gasoline storage tanks meet the applicable requirements of §60.112b(a)(2), except that the requirements of §60.112b(a)(2)(ii) shall only be required if the tank meets the conditions described in **Paragraph [1)c]** below. Each tank shall meet the following specifications for a fixed roof in combination with an external floating roof:
- i) Each external floating roof shall be equipped with a closure device between the wall of the storage vessel and the roof edge. The closure device is to consist of two seals, one above the other. The lower seal is referred to as the primary seal, and the upper seal is referred to as the secondary seal.
- (1) The primary seal shall be either a mechanical shoe seal or a liquid-mounted seal. Except as provided in **Monitoring / Recordkeeping, Paragraph [1)d]**, the seal shall completely cover the annular space between the edge of the floating roof and tank wall.
- (2) The secondary seal shall completely cover the annular space between the external floating roof and the wall of the storage vessel in a continuous fashion except as allowed in **Monitoring / Recordkeeping, Paragraph [1)d]**.
- ii) The roof shall be floating on the liquid at all times (i.e., off the roof leg supports) except during initial fill until the roof is lifted off leg supports and when the tank is completely emptied and subsequently refilled. The process of filling, emptying, or refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible.
- iii) If Tank 1901, 1902, 1905, and/or 1908 did not meet the requirements listed described in **Paragraph [1)a]** of this section as of the tank's installation date or the effective date of 40 CFR Part 63 Subpart BBBB, whichever is later, the tank(s) must also meet the following requirements:
- (1) Except for automatic bleeder vents and rim space vents, each opening in a noncontact external floating roof shall provide a projection below the liquid surface.

- (2) Except for automatic bleeder vents, rim space vents, roof drains, and leg sleeves, each opening in the roof is to be equipped with a gasketed cover, seal, or lid that is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use.
- (3) Automatic bleeder vents 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.
- (4) Rim vents are to be set to open when the roof is being floated off the roof legs supports or at the manufacturer's recommended setting.
- (5) Automatic bleeder vents and rim space vents are to be gasketed.
- (6) Each emergency roof drain is to be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening.

Monitoring / Recordkeeping Requirements:

1) External Floating Roof, §63.11092(e)(2) and §60.113b(b):

- a) The permittee shall perform the following inspections as described in §60.113b(b) for the EU1901, EU1902, EU1905, and EU1908 external floating roof gasoline storage tanks that are equipped with an external floating roof:
 - i) Determine the gap areas and maximum gap widths, between the primary seal and the wall of the storage vessel and between the secondary seal and the wall of the storage vessel according to the following frequency.
 - (1) Measurements of gaps between the tank wall and the primary seal (seal gaps) shall be performed during the hydrostatic testing of the vessel or within 60 days of the initial fill with VOL and at least once every five years thereafter.
 - (2) Measurements of gaps between the tank wall and the secondary seal shall be performed within 60 days of the initial fill with VOL and at least once per year thereafter.
 - (3) If any tank ceases to store VOL for a period of 1 year or more, subsequent introduction of VOL into the vessel shall be considered an initial fill for the purposes of **Paragraphs [1)(a)1] and [1)(a)2]** of this section (i.e. §60.113b(b)(1)(i) and (ii)).
 - ii) Determine gap widths and areas in the primary and secondary seals individually by the following procedures:
 - (1) Measure seal gaps, if any, at one or more floating roof levels when the roof is floating off the roof leg supports.
 - (2) Measure seal gaps around the entire circumference of the tank in each place where a 0.32-cm diameter uniform probe passes freely (without forcing or binding against seal) between the seal and the wall of the storage vessel and measure the circumferential distance of each such location.
 - (3) The total surface area of each gap described in **Paragraph [1)(b)2]** above, (i.e. §60.113b(b)(2)(ii)), shall be determined by using probes of various widths to measure accurately the actual distance from the tank wall to the seal and multiplying each such width by its respective circumferential distance.
 - iii) Add the gap surface area of each gap location for the primary seal and the secondary seal individually and divide the sum for each seal by the nominal diameter of the tank and compare each ratio to the respective standards in section **Paragraph [1)(d)]** below, (i.e. §60.113b(b)(4)).
 - iv) Make necessary repairs or empty the storage vessel within 45 days of identification in any inspection for seals not meeting the requirements listed in **Paragraphs [1)(d)1] and [1)(d)2]** below, (i.e. §60.113b(b)(4)(i) and (ii)):
 - (1) The accumulated area of gaps between the tank wall and the mechanical shoe or liquid-mounted primary seal shall not exceed 212 cm² per meter of tank diameter, and the width of any portion of any gap shall not exceed 3.81 cm.
 1. One end of the mechanical shoe is to extend into the stored liquid, and the other end is to extend a minimum vertical distance of 61 cm above the stored liquid surface.

2. There are to be no holes, tears, or other openings in the shoe, seal fabric, or seal envelope.
 - (2) The secondary seal is to meet the following requirements:
 1. The secondary seal is to be installed above the primary seal so that it completely covers the space between the roof edge and the tank wall except as provided in **Paragraph [1]b)3]**, (i.e. §60.113b(b)(2)(iii)) of this section.
 2. The accumulated area of gaps between the tank wall and the secondary seal shall not exceed 21.2 cm² per meter of tank diameter, and the width of any portion of any gap shall not exceed 1.27 cm.
 3. There are to be no holes, tears, or other openings in the seal or seal fabric.
 - (3) If a failure that is detected during inspections required in Paragraph **[1]a)]** above, (i.e. §60.113b(b)(1)), cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Missouri Department of Natural Resources, Air Pollution Control Program in the inspection report required in **Reporting Requirements, Paragraph [3)]** below, (i.e. §60.115b(b)(4)). Such extension request must include a demonstration of unavailability of alternate storage capacity and a specification of a schedule that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
 - v) Notify the Missouri Department of Natural Resources Air Pollution Control Program 30 days in advance of any gap measurements required by **Paragraph [1]a)]** above, (i.e. §60.113b(b)(1)), to afford the Department of Natural Resources the opportunity to have an observer present.
 - vi) Visually inspect the external floating roof, the primary seal, secondary seal, and fittings each time the vessel is emptied and degassed.
 - (1) If the external 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, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before filling or refilling the storage vessel with VOL.
 - (2) For all the inspections required by **Paragraph [1]f)]** above, (i.e. §60.113b(b)(6)), the permittee shall notify the Missouri Department of Natural Resources Air Pollution Control Program in writing at least 30 days prior to the filling or refilling of each storage vessel to afford the Department of Natural Resources the opportunity to inspect the storage vessel prior to refilling. If the inspection required by **Paragraph [1]f)]** above, (i.e. §60.113b(b)(6)), is not planned and the permittee could not have known about the inspection 30 days in advance of refilling the tank, the permittee shall notify the Department of Natural Resources at least seven 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 Department of Natural Resources at least seven days prior to the refilling.
 - vii) The permittee shall keep a record of each gap measurement performed as required according to **Paragraphs [1]a) through [1]f)]** of this section (i.e. §60.113b(b)). Each record shall identify the storage vessel in which the measurement was performed and shall contain the date of measurement, the raw data obtained in the measurement, and the calculations described in **Paragraphs [1]b)] and [1]c)]** of this section, (i.e. §60.113b (b)(2) and (b)(3)). These records should be maintained onsite for a minimum of five years.
- 2) General, §63.11094(c) and §60.116b:
- a) The permittee shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of the EU1901, EU1902, EU1905, or EU1908 storage vessels. These

records shall be maintained onsite for the life of the tank or a minimum of five years, whichever is longer.

- b) If an alternate control method is elected for EU1901, EU1902, EU1905, or EU1908 as described in **Emission / Operational Limits, Paragraph [2)]**, the permittee shall maintain a copy of Attachment G-1 or G-4 as applicable for the method selected for the tank(s).
- c) The permittee shall maintain all records onsite for a minimum of five years unless a longer period is specified with the requirement.
- d) The permittee shall immediately make any record available for inspection to Missouri Department of Natural Resources' personnel upon request.

Reporting Requirements:

1) **Notifications required by §63.11093 and §63.9 for 40 CFR Part 63, Subpart BBBBBB:**

- a) The permittee shall submit the following notifications to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as applicable for the EU1901, EU1902, EU1905, and EU1908 EU0050 external floating roof tanks:
 - i) The permittee shall submit an initial notification as specified in §63.9(b) to the Air Pollution Control Program which indicates that the installation is subject to 40 CFR Part 63 Subpart BBBBBB. For existing tanks the initial notification is due by May 9, 2008.
 - ii) The permittee shall submit a Notification of Compliance Status as specified in §63.9(h). The Notification of Compliance Status must state which of the compliance options referenced in Table 1 to Subpart BBBBBB is used to comply with the subpart. The Notification of Compliance Status must be sent before the close of business on the 60th day following the completion of the relevant compliance demonstration activity specified in the relevant standard (unless a different reporting period is specified in the standard, in which case the letter must be sent before the close of business on the day the report of the relevant testing or monitoring results is required to be delivered or postmarked).
 - iii) The permittee shall submit a written Notification of Performance Test as specified in §69.9(e) prior to initiating testing intended to demonstrate compliance with the compliance option selected. The Notification must be submitted at least 60 calendar days before the performance test is scheduled to begin to allow the Missouri Department of Natural Resources, Air Pollution Control Program to review and approve the site-specific test plan required under §63.7(c), if requested by the Department of Natural Resources, and to have an observer present during the test.
 - iv) The permittee shall submit additional notifications specified in §63.9, as applicable.

2) **Reports required for External Floating Roof Tanks by §63.11095(a)(1) and §60.115b(b):**

- a) The permittee shall submit the following reports to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as applicable for each EU1901, EU1902, EU1905, and/or EU1908 external floating roof tank:
 - i) After installing the external floating roof as described in **Emission / Operational Limitations** above, the permittee shall submit a report to the Air Pollution Control Program that describes the control equipment and certifies that the control equipment meets the specifications of §60.112b(a)(2) and §60.113b(b)(2), (b)(3), and b(4).
 - ii) Within 60 days of performing the seal gap measurements required described in **Monitoring / Recordkeeping Requirements, Paragraph [1b)]**, (i.e. §60.113b(b)(1)), the permittee shall submit a report to the Air Pollution Control Program. The report shall identify the storage vessel in which the measurement was performed and shall contain the date of measurement, the raw data obtained in the measurement, and the calculations described in **Monitoring / Recordkeeping Requirements, Paragraphs [1b)] and [1c)]**, (i.e. §60.113b (b)(2) and (b)(3)).

iii) After each seal gap measurement that detects gaps exceeding the limitations specified by **Monitoring / Recordkeeping Requirements, Paragraph [1d]**, (i.e. §60.113b(b)(4)), the permittee shall submit a report to the Air Pollution Control Program within 30 days of the inspection. The report shall identify the storage vessel, the date of measurement, the raw data obtained in the measurement, and the calculations described in **Monitoring / Recordkeeping, Paragraphs [1b] and [1c]**, (i.e. §60.113b (b)(2) and (b)(3)), and the date the storage vessel was emptied or the nature of and date the repairs were made.

3) **General, All:**

Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

<p>PERMIT CONDITION (EU1901, EU1902, EU1905, and EU1908)-002 10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) <i>Voluntary Limitation(s)</i></p>
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Emission/Operational Limitations:

- 1) The permittee may designate that Tanks EU1901, 1902, 1905, and/or 1908 will not be used to store gasoline in lieu of having that tank subject to the control requirements of 40 CFR Part 63, Subpart BBBBBB. Each designated tank will be referred to as a “non-gasoline storage tank” for the purpose of this permit condition.
- 2) A non-gasoline storage tank shall remain subject to the requirements of 40 CFR Part 63, Subpart BBBBBB until the receipt of the notification of this change (from gasoline storage to non-gasoline storage) by the Missouri Department of Natural Resources. A non-gasoline storage tank will then be subject to permit conditions in this Section -002 and no longer be subject to Permit Condition -001 for the affected emission unit.
- 3) The permittee shall not use any non-gasoline storage tank to store gasoline on or after January 9, 2011, without notifying the Missouri Department of Natural Resources in advance of the changes **AND** unless the requirements of Attachments G-1, G-2, or G-3 are complied with.

Monitoring/Recordkeeping Requirements:

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

Reporting Requirements:

- 1) The permittee shall submit a written notification to the Missouri Department of Natural Resources Air Pollution Control Program for each tank that will not be used to store gasoline which includes the following:
 - a) The tank number and description;
 - b) The tank’s emission unit number; and
 - c) The proposed effective date of the change.

- 2) The permittee must submit a written notification to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, stating that a designated tank will no longer be used to store gasoline.
- 3) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification as required by 10 CSR 10-6.065(5)(C)1.B. and Section V of this permit.

Reporting Requirements:

Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification as required by 10 CSR 10-6.065(5)(C)1.B. and Section V of this permit.

PERMIT CONDITION EU1908-003
10 CSR 10-6.060 Construction Permits Required
Construction Permit 0692-024, Issued June 1992

Operation Limitation:

- 1) Throughput of Tank 1908 shall not exceed 175,000,000 gallons during any 12 month period. [Special Condition 3]
- 2) Tank 1908 shall comply with the Missouri Rule 10 CSR 10-6.070, New Source Performance Standards, Subpart Kb, Sections 60.113b, Testing and Procedures, Section 60.115b, Reporting and Recordkeeping. [Special Condition 5]
- 3) The shell of the tank shall be maintained so as to have no more deterioration than light rust. [Special Condition 6]

Monitoring/Recordkeeping:

- 1) Records of Tank 1908 monthly total throughputs shall be kept on-site. Records of totals for each consecutive 12-month period shall be kept on-site as well. [Special Condition 8] Attachment F or equivalent can be used for this purpose.
- 2) These records shall be kept on-site for at least five (5) consecutive years. These records shall be made available to Department of Natural Resources’ personnel upon request. [Special Conditions 9 and 10 CSR 10-6.065(6)(C)(b)1.]

Reporting:

- 1) All notifications required by Subpart Kb and Subpart A, Section 60.7, shall be sent to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. [Special Condition 10]
- 2) The permittee shall report to the Air Pollution Control Program’s 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.

EU1906 – Internal Floating Roof Petroleum Storage Tank Internal Floating Roof Petroleum Storage Tanks with greater than or equal to 75 cubic meters storage capacity		
Emission Unit	Description	2009 EIQ Reference #
EU1906	Tank #1906: 3,360,000 gallon internal floating roof tank, installed 1976	EP1
PERMIT CONDITION EU1906-001		

10 CSR 10-6.070 *New Source Performance Regulations Subpart K*
40 CFR 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*

Emission/Operational Limitations:

- 1) The permittee shall not store petroleum liquid with a true vapor pressure equal to or greater than 1.5 psia but less than or equal to 11.1 psia in EU1906 (Tank #1906) unless the tank is equipped with a floating roof, a vapor recovery system, or their equivalents.
- 2) The permittee shall not store petroleum liquid with a true vapor pressure of greater than 11.1 psia in EU1906 (Tank #1906)) unless the tank is equipped with a vapor recovery system or its equivalent.

Monitoring/Recordkeeping Requirements:

- 1) The permittee shall maintain records of the petroleum liquid stored in EU1906 (Tank #1906) using the log shown in Attachment H-1 or an equivalent created by the permittee. These records shall contain at least the following information:
 - a) The name of each petroleum liquid stored;
 - b) The period that each petroleum liquid was stored in the tank; and
 - c) If Tank #1906 is used to store gasoline with a RVP of 13 or higher, the actual maximum temperature of the tank contents on any date when the maximum daily temperature exceeds 85 degrees Fahrenheit (°F).
- 2) The permittee shall maintain the internal floating roof on EU19060 in good operating condition and keep records of all maintenance, repairs and tests performed on the tank using the log shown in Attachment E or an equivalent created by the permittee.
- 3) All records shall be maintained for a minimum of five years.
- 4) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

PERMIT CONDITION EU1906-002

10 CSR 10-6.075 *Maximum Achievable Control Technology Regulations*
40 CFR 63 Subpart BBBB – *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities*

Emission/Operational Limitations:

- 1) The permittee shall control emissions from EU1906 (Tank #1906) that will be used for gasoline storage by selecting to use the specified floating roofs and seals described in 40 CFR 60 Subpart Kb, the specified floating roofs and seals described in 40 CFR 63 Subpart WW, or a closed vent system and control device as listed in the table below.

Compliance Method	Additional Permit Conditions
Closed Vent System and Control Device to reduce emissions by 95%	Attachment G-1
40 CFR 60 Subpart Kb Requirements for Internal Floating Roof Tanks	Attachment G-2
40 CFR 63 Subpart WW Requirements for Internal Floating Roof Tanks	Attachment G-3

- 2) The permittee shall meet the specific operational limitations listed in Attachment G-1, G-2, or G-3 that apply to the control method selected for each tank.

- 3) The permittee may designate that EU1906 (Tank #1906) will not be used to store gasoline instead of selecting a control option as listed in Paragraph [1] of this section. Such tanks shall comply with the permit conditions described in EU1906-003 and shall not be subject to the permit conditions of this Section -002 after the effective date as determined in accordance with Permit Condition -003 for the affected emission unit(s).
- 4) The permittee shall ensure that EU1906 (Tanks #1906) are in compliance with a selected control method by January 10, 2011, with the following exception:
 - a) Any storage tank that is equipped with a floating roof and that does not currently meet the applicable emission requirement or management standard listed in the table above must be in compliance at the first degassing and cleaning activity after January 10, 2011, or by January 10, 2018, whichever is first.

Monitoring/Recordkeeping Requirements:

- 1) The permittee shall maintain a list of the control method selected for EU1906 (Tank #1906). The permittee shall maintain a copy of Attachment G-1, G-2, or G-3 as applicable for the method selected for each tank.
- 2) The permittee shall maintain records of the petroleum liquids stored in EU1906 using the log shown in Attachment H-2 or an equivalent created by the permittee. These records shall contain at least the following information:
 - a) The name of each petroleum liquid stored; and
 - b) The storage period for each petroleum liquid that was stored in the tank.
- 3) The permittee shall comply with the specific monitoring and recordkeeping conditions listed in Attachments G-1, G-2, or G-3 that are applicable to the control method selected for each tank.
- 4) All records shall be maintained for a minimum of five years or for the period specified in the applicable attachment, whichever is longer.
- 5) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

Reporting Requirements:

- 1) The permittee shall submit a Notification of Compliance Status as specified in 40 CFR 63.9(h). The Notification of Compliance Status must specify which of the compliance options was elected to apply to each tank. The notification must be sent before the close of business on the 60th day following the completion of the compliance demonstration activity specified by Attachment G-2, G-3, or G-1 (unless a different reporting period is specified in the standard, in which case the letter must be sent before the close of business on the day the report of the relevant testing or monitoring results is required to be delivered or postmarked). The notification must include the following:
 - a) The methods that were used to determine compliance;
 - b) The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
 - c) The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;
 - d) The type and quantity of hazardous air pollutants emitted by the source (or surrogate pollutants if specified in the relevant standard), reported in units and averaging times and in accordance with the test methods specified in the relevant standard;
 - e) If the relevant standard applies to both major and area sources, an analysis demonstrating whether the affected source is a major source (using the emissions data generated for this notification);
 - f) A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and

- g) A statement by the permittee of the affected existing, new, or reconstructed source as to whether the source has complied with the relevant standard or other requirements.
- 2) The permittee shall submit a written Notification of Performance Test as specified in 40 CFR 69.9(e) prior to initiating testing intended to demonstrate compliance with the permit condition(s) specified in Attachment G-1. The notification must be submitted at least 60 calendar days before the performance test is scheduled to begin to allow the Missouri Department of Natural Resources Air Pollution Control Program to review and approve the site-specific test plan required under 40 CFR 63.7(c), if requested by the Department of Natural Resources, and to have an observer present during the test.
- 3) The permittee shall comply with the specific reporting requirements listed in Attachment G-2, G-3, or G-1 that apply to the control method selected for EU1906 Tank #1906. Because EU1906 is an existing unit, the reporting requirements of 1a on Attachments G-2 and G-3 do not apply to these units.
- 4) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification as required by 10 CSR 10-6.065(5)(C)1.B. and Section V of this permit.

PERMIT CONDITION EU1906-003

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) *Voluntary Limitation(s)*

Emission/Operational Limitations:

- 1) The permittee may designate that Tank EU1906 will not be used to store gasoline in lieu of having that tank subject to the control requirements of 40 CFR Part 63, Subpart BBBBBB. Each designated tank will be referred to as a “non-gasoline storage tank” for the purpose of this permit condition.
- 2) A non-gasoline storage tank shall remain subject to the requirements of 40 CFR Part 63, Subpart BBBBBB until the receipt of the notification of this change (from gasoline storage to non-gasoline storage) by the Missouri Department of Natural Resources. A non-gasoline storage tank will then be subject to permit conditions in this Section -003 and no longer be subject to Permit Condition -002 for the affected emission unit.
- 3) The permittee shall not use any non-gasoline storage tank to store gasoline on or after January 9, 2011, without notifying the Missouri Department of Natural Resources in advance of the changes **AND** unless the requirements of Attachments G-2, G-3, or G-1 are complied with.

Monitoring/Recordkeeping Requirements:

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

Reporting Requirements:

- 1) The permittee shall submit a written notification to the Missouri Department of Natural Resources Air Pollution Control Program for each tank that will not be used to store gasoline which includes the following:
 - a) The tank number and description;
 - b) The tank’s emission unit number; and

- c) The proposed effective date of the change.
- 2) The permittee must submit a written notification to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, stating that a designated tank will no longer be used to store gasoline.
- 3) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification as required by 10 CSR 10-6.065(5)(C)1.B. and Section V of this permit.

Reporting Requirements:

Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification as required by 10 CSR 10-6.065(5)(C)1.B. and Section V of this permit.

EU1907 – Fixed Roof Petroleum Storage Tank with greater than or equal to 75 cubic meters storage capacity		
Emission Unit	Description	2009 EIQ Reference #
EU1907	Tank #1907: 3,360,000 gallon fixed roof tank	EP6

PERMIT CONDITION EU1907-001
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit #0692-024, Issued June 1992
 10 CSR 10-6.070 New Source Performance Regulations
 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

Operation Limitation:

- 1) Throughput of Tank 1907 shall not exceed 130,000,000 gallons during any 12 month period. [The 130,000,000 gallons throughput limit was requested by Ryan Trainer in a letter to the Missouri Department of Natural Resources dated November 12, 1998.]
- 2) No Volatile Organic Liquid (VOL) having a vapor pressure greater than Jet Fuel (0.009 psia at 70°F) shall be stored in Tank 1907. [Special Condition 2]
- 3) Tank 1907 shall comply with Missouri Rule 10 CSR 10-6.070, New Source Performance Standards, Subpart Kb, Section 60.116b, Paragraphs (a) and (b). [Special Condition 4]
- 4) The shell of the tank shall be maintained so as to have no more deterioration than light rust. [Special Condition 6]

Monitoring/Recordkeeping:

- 1) Records of Tank 1907 monthly total throughputs shall be kept on-site. Records of totals for each consecutive 12-month period shall be kept on-site as well. [Special Condition 7] Attachment F or equivalent can be used for this purpose.
- 2) 40 CFR Part 60, Subpart Kb Section 60.116b(a) states the owner or operator shall keep copies of all records required by Section 60.116b. The record required by Paragraph (b) of this section will be kept for the life of the source. [§60.116b(a)]
- 3) The owner or operator of each storage vessel shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. [§60.116b(b)]

- 4) These records shall be kept on-site for at least five (5) consecutive years. These records shall be made available to Department of Natural Resources' personnel upon request. [Special Condition 9 and 10 CSR 10-6.065(6)(C)(b)1.]

Reporting:

- 1) All notifications required by Subpart Kb shall be sent to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. [Special Condition 10]
- 2) The permittee shall report to the Air Pollution Control Program's 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.

EU1909, EU1961, AND EU1962 – Coned Roof Internal Floating Roof Storage Tanks with greater than or equal to 75 cubic meters storage capacity		
Emission Unit	Description	2009 EIQ Reference #
EU1909	Tank 1909: 2,100,000 gallon, coned roof, internal floating roof tank, installed 2007	EP1
EU1961	Tank 1961: 84,000 gallon, coned roof, internal floating roof tank, installed 1958, modified 2003	EP6
EU1962	Tank 1962: 84,000 gallon, coned roof, internal floating roof tank, installed 1958, modified 2007	EP1

PERMIT CONDITION (EU1909, 1961, and EU1962)-001
 10 CSR 10-6.070 New Source Performance Regulations
 40 CFR Part 60, Subpart A General Provisions and 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
 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
 40 CFR Part 63, Subpart A General Provisions and Subpart BBBBBB National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

Emission / Operational Limitations:

- 1) The permittee shall control emissions from the EU1909 and EU1962 gasoline storage vessels (Tanks 1909 and 1962) in accordance with the most stringent applicable provisions of 40 CFR Part 60, Subpart Kb and 40 CFR Part 63, Subpart BBBBBB (compliance date January 10, 2011).
- 2) Storage tanks that are subject to, and comply with, the control requirements of 40 CFR Part 60 Subpart Kb, will be deemed to be in compliance with 40 CFR Part 63 Subpart BBBBBB.
- 3) The permittee shall not store any volatile organic liquid with a true vapor pressure of greater than 11.1 psi (76.6 kPa) in EU1909 or EU1962 (Tanks 1909 or 1961) unless a closed vent system and control system or equivalent is installed as described in **Equipment / Procedural Requirements, Paragraph [2] or [3]**, below.

Equipment / Procedural Requirements:

- 1) **Internal Floating Roof, §60.112b(a)(1):**
 - a) The permittee shall ensure that the EU1909 and EU1962 internal floating roof gasoline storage tanks meet the applicable requirements of §60.112b(a)(1). Each tank shall meet the following specifications for a fixed roof in combination with an internal floating roof:

- i) 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.
 - ii) 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:
 - (1) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
 - (2) 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.
 - (3) 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.
 - iii) 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.
 - iv) 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.
 - v) 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.
 - vi) 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.
 - vii) 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.
 - viii) 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.
 - ix) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- 2) Equivalent Alternate Device §60.112b(a)(4) & §60.114b:
The permittee may request approval from the Director to equip EU1909 or EU1962 (Tank 1909 or 1962) with an equivalent system to those described in Paragraph [1] that will achieve a reduction in emissions at least equivalent to the reduction in emissions achieved by those methods, as provided for in §60.114b.

Monitoring / Recordkeeping Requirements:

- 1) Internal Floating Roof, §60.113b(a) and §60.115b(a)(2):
 - a) The permittee shall perform the following inspections as described in §60.113b(a) for each EU1909 or EU1962 (Tank 1909 or 1962 that is equipped with a fixed roof in combination with an internal floating roof:
 - i) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with gasoline. If there are holes, tears, or other openings in

- the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage vessel.
- ii) For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the gasoline inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Missouri Department of Natural Resources, Air Pollution Control Program in the inspection report required in **Reporting Requirements, Paragraph [1]** below, (i.e. §60.115b(a)(3)). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
 - iii) For vessels equipped with a double-seal system as specified in **Equipment / Procedural Requirements, Paragraph [1]b)2.]** above, (i.e. §60.112b(a)(1)(ii)(B)):
 - (1) Visually inspect the vessel as specified in **Paragraph [1]d]** below, (i.e. §60.113b(a)(4)), at least every five years; or
 - (2) Visually inspect the vessel as specified in **Paragraph [1]b]** above, (i.e. §60.113b(a)(2)).
 - iv) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than ten years in the case of vessels conducting the annual visual inspection as specified in **Paragraph [1]b]** of this section, (i.e. §60.113b(a)(2).)
 - v) The permittee shall notify the Missouri Department of Natural Resources, Air Pollution Control Program in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by **Paragraphs [1]a) and [1]d]** of this section, (i.e. §60.113b(a)(1) and (a)(4)), to afford the Department of Natural Resources the opportunity to have an observer present. If the inspection required by **Paragraph [1]d]** of this section, (i.e. §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 Missouri Department of Natural Resources, Air Pollution Control Program at least seven days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Missouri Department of Natural Resources, Air Pollution Control Program at least seven days prior to the refilling.
 - vi) The permittee shall keep a record of each inspection performed as required in **Paragraphs [1]a) through d]**. 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 including seals, internal floating roof, and fittings. These records shall be maintained onsite for a minimum of five years.

2) General, §60.116b and §63.11094(a):

- a) The permittee shall keep readily accessible records showing the storage vessel dimension and an analysis showing the capacity of each EU1909 and EU1962 (Tanks 1909 and 1962) storage vessel. These records shall be maintained onsite for the life of the tank or a minimum of five years, whichever is longer.
- b) The permittee shall maintain records of the petroleum liquid(s) stored in EU1909 and EU1962 (Tanks 1909 and 1962) using the log shown in Attachment F or an equivalent created by the permittee. These records shall be maintained onsite for a minimum of five years and shall contain at least the following information:
 - i) The name of each petroleum liquid stored;
 - ii) The period that each petroleum liquid was stored in the tank; and
 - iii) The maximum true vapor pressure of that petroleum liquid during the respective storage period.
 - iv) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined according to §60.116b(e).
- c) The permittee shall maintain all records onsite for a minimum of five years unless a longer period is specified with the requirement.
- d) The permittee shall immediately make any record available for inspection to Missouri Department of Natural Resources' personnel upon request.

Reporting Requirements:

1) Notifications required by §63.11093 and §63.9 for 40 CFR Part 63, Subpart BBBBBB:

- a) The permittee shall submit the following notifications to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 as applicable for the EU1909 and EU1962 internal floating roof tanks:
 - i) The permittee shall submit a Notification of Compliance Status as specified in §63.9(h). The Notification of Compliance Status must state which of the compliance options referenced in Table 1 to Subpart BBBBBB is used to comply with the subpart.
 - ii) The permittee shall submit a written Notification of Performance Test as specified in §69.9(e) prior to initiating testing intended to demonstrate compliance with the compliance option selected. The Notification must be submitted at least 30 calendar days before the performance test is scheduled to begin to allow the Missouri Department of Natural Resources, Air Pollution Control Program to review and approve the site-specific test plan required under §63.7(c), if requested by the Department of Natural Resources, and to have an observer present during the test.
 - iii) The permittee shall submit additional notifications specified in §63.9, as applicable.

2) Reports required for Internal Floating Roof Tanks by §60.115b(a) and §63.11095(a)(1):

- a) The permittee shall submit the following reports to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 as applicable for each EU1909 or EU1962 internal floating roof tank:
 - i) After installing the internal floating roof as described in **Equipment / Procedural Requirements, Paragraph [1]** above, the permittee shall submit a report to the Air Pollution Control Program 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), which requires a notification of the actual date of initial startup of the tank as equipped with the control equipment that meets the specifications. The report shall be postmarked within 15 days after the actual date of initial startup.
 - ii) If any of the conditions described in **Monitoring / Recordkeeping Requirements, Paragraph [1]b)**, (i.e. §60.113b(a)(2)), are detected during the annual visual inspection required, the permittee shall submit a report to the Air Pollution Control Program within 30 days of the inspection. The report

shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

- iii) After each inspection required by **Monitoring / Recordkeeping Requirements, Paragraph [1c]**, (i.e. §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, the permittee shall submit a report to Air Pollution Control Program within 30 days of the inspection. The report shall identify the storage vessel, the reason it did not meet the applicable specifications, and list each repair made.

3) **General, All:**

Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

PERMIT CONDITION (EU1909, 1961, and EU1962)-002

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) *Voluntary Limitation(s)*

Emission/Operational Limitations:

- 1) The permittee may designate that Tank EU1909 and/or Tank 1962 will not be used to store gasoline in lieu of having that tank subject to the control requirements of 40 CFR Part 63, Subpart BBBBBB. Each designated tank will be referred to as a “non-gasoline storage tank” for the purpose of this permit condition.
- 2) A non-gasoline storage tank shall remain subject to the requirements of 40 CFR Part 63, Subpart BBBBBB until the receipt of the notification of this change (from gasoline storage to non-gasoline storage) by the Missouri Department of Natural Resources. A non-gasoline storage tank will then be subject to permit conditions in this Section -002 and no longer be subject to Permit Condition -001 for the affected emission unit.
- 3) The permittee shall not use any non-gasoline storage tank to store gasoline on or after January 9, 2011, without notifying the Missouri Department of Natural Resources in advance of the changes **AND** unless the requirements of Attachments G-2, G-3, or G-1 are complied with.

Monitoring/Recordkeeping Requirements:

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

Reporting Requirements:

- 1) The permittee shall submit a written notification to the Missouri Department of Natural Resources Air Pollution Control Program for each tank that will not be used to store gasoline which includes the following:
 - 2) The tank number and description;
 - 3) The tank’s emission unit number; and
 - 4) The proposed effective date of the change.

- 5) The permittee must submit a written notification to the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, stating that a designated tank will no longer be used to store gasoline.
- 6) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification as required by 10 CSR 10-6.065(5)(C)1.B. and Section V of this permit.

Reporting Requirements:

Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification as required by 10 CSR 10-6.065(5)(C)1.B. and Section V of this permit.

- 1) The owner or operator 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 Administrator. [\[§60.116b\(f\)\(1\)\(iii\)\]](#)

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 is only an excerpt from the regulation or code, and is 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) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises
 - b) Yard waste.
 - c) Land clearing of vegetative debris that is at least two hundred (200) yards from the nearest occupied structure.
 - d) Agricultural burning. Fires set in connection with with agricultural or forestry operations related to the growing or harvesting of crops.
 - e) Natural Resources and and land management. Prescribed fires set for natural resource management purposes.
- 3) 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.
- 4) Cape Girardeau Terminal may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Cape Girardeau Terminal fails to comply with the provisions or any condition of the open burning permit.
 - a) In a nonattainment area, as defined in 10 CSR 10-6.020, Paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 5) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director. Attachment C can or equivalent can be used for this purpose.

- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971 is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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) Best 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 list to the Director in writing at least ten days prior to any maintenance, start-up or shutdown, 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, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the Director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 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. [10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request. [10 CSR 10-6.065(6)(C)3.B]

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee may be required by the Director to file additional reports.
- 3) 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.
- 4) 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.
- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the Director.
- 6) The permittee shall complete required reports on state supplied EIQ forms or in a form satisfactory to the Director and the reports shall be submitted to the Director by June 1 after the end of each reporting period.
- 7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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 10-6.170

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.

Monitoring:

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation. The permittee shall maintain the following monitoring schedule:

- 1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
- 2) Should no violation of this regulation be observed during this period then-
 - a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - b) If a violation is noted, monitoring reverts to weekly.
 - c) Should no violation of this regulation be observed during this period then-
 - i) The permittee may observe once per month.
 - ii) If a violation is noted, monitoring reverts to weekly.
- 3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

The permittee shall document all readings on Attachment A, or its equivalent, noting the following:

- 1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
- 2) Whether the visible emissions were normal for the installation.
- 3) Whether equipment malfunctions contributed to an exceedance.
- 4) Any violations and any corrective actions undertaken to correct the violation.

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 10-6.165 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.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 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 §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §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:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §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 §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 as specified 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*

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 by a permittee:
 - 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.

V. General Permit Requirements

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

10 CSR 10-6.065(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

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

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program's 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.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi-annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. 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 semi-annual 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.

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

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, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(6)(C)1.F Severability Clause

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.

10 CSR 10-6.065(6)(C)1.G General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions

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.

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 semi-annually (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, 901 North 5th Street, Kansas City, KS 66101, as well as the Air Pollution Control Program's 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 application 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's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, 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's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, 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 Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall

be provided to the EPA and the Air Pollution Control Program 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 Air Pollution Control Program 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 application, 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 written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. 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)12 Responsible Official

The application utilized in the preparation of this permit was signed by Larry Cadle, Region Manager. On April 8, 2008, the Air Pollution Control Program was notified that Terry Hurlburt, Senior Vice President – Operations, replaced Larry Cadle. On December 3, 2010, the Air Pollution Control Program was notified that Kevin Bodenhammer, Senior Vice President – Liquid Pipeline Operations is 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) The Missouri Department of Natural Resources 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) The Missouri Department of Natural Resources 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 C

Method 9 Opacity Emissions Observations								
Company					Observer			
Location					Observer Certification Date			
Date					Emission Unit			
Time					Control Device			
Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							
SUMMARY OF AVERAGE OPACITY								
Set Number	Time				Opacity			
	Start	End		Sum	Average			

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____
 YES NO Signature of Observer

Attachment D
Leak Inspection Log Sheet

Date of Inspection	Equipment ¹ Name (Emission Point #)	Leak Detected?	Method of Detection?	Location of Leak	Description of Leak	List each date a repair was attempted ²	Comments / Reason Repair Was Not Completed Within 15 Days	Date the repair was completed OR the target date ³
		(None / Liquid / Vapor / Both)	(Sight/Sound/ Smell)					
		(None / Liquid / Vapor / Both)	(Sight/Sound/ Smell)					
		(None / Liquid / Vapor / Both)	(Sight/Sound/ Smell)					
		(None / Liquid / Vapor / Both)	(Sight/Sound/ Smell)					
		(None / Liquid / Vapor / Both)	(Sight/Sound/ Smell)					
		(None / Liquid / Vapor / Both)	(Sight/Sound/ Smell)					
		(None / Liquid / Vapor / Both)	(Sight/Sound/ Smell)					
		(None / Liquid / Vapor / Both)	(Sight/Sound/ Smell)					
		(None / Liquid / Vapor / Both)	(Sight/Sound/ Smell)					
		(None / Liquid / Vapor / Both)	(Sight/Sound/ Smell)					
		(None / Liquid / Vapor / Both)	(Sight/Sound/ Smell)					

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

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

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

Inspected By _____

Signature of Owner / Operator _____

DUPLICATE THIS FORM AS NEEDED

Attachment G-1

Permit Conditions for Tanks Subject to 40 CFR 63 Subpart BBBBBB that elect to control emissions using a Closed Vent System and Control Device To Reduce Emissions By 95 percent

Table 1 to Subpart BBBBBB of Part 63 - Applicability Criteria, Emission Limits, and Management Practices for Storage Tanks: Scenario 2(a)

Equipment / Procedural Requirements:

Closed Vent System and Control Device, §63.11087, §63.11092(d) and §60.112b(a)(3):

- 1) The permittee shall reduce emissions of total organic HAP or TOC by 95 weight-percent using a closed vent system and control device as specified by §60.112b(a)(3) as follows:
 - a) The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel. The system shall be operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in §60.485(b).
 - b) The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater. If a flare is used as the control device, it shall meet the specifications described in the general control device requirements in §60.18.
- 2) The permittee shall comply with the following requirements:
 - a) Operate the vapor processing system in a manner not to exceed or not to go below, as appropriate, the operating parameter value for the parameters described in **Monitoring/Testing Requirements, Paragraph [2)a]**, below, (i.e. §63.11092(b)(1)).
 - b) In cases where an alternative parameter pursuant to **Monitoring/Testing Requirements, Paragraphs [2)a]4.] or [2)e]1.]**, below is approved, (i.e. §63.11092(b)(1)(iv) or §63.11092(b)(5)(i)), the permittee shall operate the vapor processing system in a manner not to exceed or not to go below, as appropriate, the alternative operating parameter value.
 - c) Operation of the vapor processing system in a manner exceeding or going below the operating parameter value, as appropriate, shall constitute a violation of the emission standard in §63.11088(a), i.e. to reduce emissions of total organic HAP or TOC by 95 weight-percent, except as specified in **Paragraph [2)d]** below.
 - d) For the monitoring and inspection, as required under **Monitoring/Testing Requirements, Paragraphs [2)a]1.b)] and [2)a]3.b)]**, below, (i.e. §63.11092 (b)(1)(i)(B)(2) and (b)(1)(iii)(B)(2)), malfunctions that are discovered shall not constitute a violation of the emission standard in §63.11088(a), i.e. to reduce emissions of total organic HAP or TOC by 95 weight-percent, if corrective actions as described in the monitoring and inspection plan are followed. The permittee must:
 - i) Initiate corrective action to determine the cause of the problem within one hour;
 - ii) Initiate corrective action to fix the problem within 24 hours;
 - iii) Complete all corrective actions needed to fix the problem as soon as practicable consistent with good air pollution control practices for minimizing emissions;
 - iv) Minimize periods of start-up, shutdown, or malfunction; and
 - v) Take any necessary corrective actions to restore normal operation and prevent the recurrence of the cause of the problem.

Monitoring/Testing Requirements:

Closed Vent System and Control Device, §63.11092(e)(3) and §63.11092 (a) through (c):

- i) The permittee shall conduct a performance test and determine a monitored operating parameter value in accordance with the requirements in **Paragraphs [1)] through [4)]** of this section, (i.e. §63.11092(a) through (d)).
 - a) Conduct a performance test on the vapor processing and collection systems according to either of the following:

- ii) Use the test methods and procedures in §60.503 of this chapter, except a reading of 500 parts per million shall be used to determine the level of leaks to be repaired under §60.503(b) of this chapter.
- iii) Use alternative test methods and procedures in accordance with the alternative test method requirements in §63.7(f).
- b) The permittee may submit a statement by a responsible official certifying the compliance status of the emission unit in lieu of the test required under Paragraph [1a)] of this section if the permittee is operating the emission unit in compliance with an enforceable State, local, or tribal rule or permit that requires closed vent and control device system to meet an emission reduction of 95 percent.
- c) If the permittee has conducted performance testing on the vapor processing and collection systems within five years prior to January 10, 2008, and the test is for the affected facility and is representative of current or anticipated operating processes and conditions, the permittee may submit the results of such testing in lieu of the test required under Paragraph [1a)] of this section, provided the testing was conducted using the test methods and procedures in §60.503 of this chapter. Should the Director deem the prior test data unacceptable, the facility is still required to meet the requirement to conduct an initial performance test within 180 days of the compliance date specified in §63.11083.
- d) The performance test requirements of Paragraph [1a)] do not apply to flares defined in §63.11100, i.e. a thermal oxidation system using an open (without enclosure) flame, and meeting the flare requirements in §63.11(b). The permittee shall demonstrate that the flare and associated vapor collection system is in compliance with the requirements in §63.11(b) and §60.503(a), (b), and (d).
- ii) For each performance test conducted under Paragraph [1a)] of this section, the permittee shall determine a monitored operating parameter value for the vapor processing system using the procedures specified in Paragraphs [2a)] through [2e)] below, (i.e. §63.11092(b)(1) through b(5)).
 - a) The permittee shall install, calibrate, certify, operate, and maintain, according to the manufacturer's specifications, a continuous monitoring system (CMS) while gasoline vapors are displaced to the vapor processor systems specified in Paragraphs [2a)1.] through [2a)4.] of this section, (i.e. §63.11092(b)(1)(i) through (iv)). During the performance test, continuously record the operating parameter as specified under Paragraphs [2a)1.] through [2a)4.] of this section, (i.e. §63.11092(b)(1)(i) through (iv)).
 - i) Where a carbon adsorption system is used, the permittee shall monitor the operation of the system as specified in the following, Paragraphs [2a)1.i] or [2a)1.ii.]:
 - (1) A continuous emissions monitoring system (CEMS) capable of measuring organic compound concentration shall be installed in the exhaust air stream.
 - (2) As an alternative to the CEMS described above, the permittee may choose to meet the following requirements:
 - a. Monitor carbon adsorption devices as follows:
 - 1. Vacuum level shall be monitored using a pressure transmitter installed in the vacuum pump suction line, with the measurements displayed on a gauge that can be visually observed. Each carbon bed shall be observed during one complete regeneration cycle on each day of operation of the loading rack to determine the maximum vacuum level achieved.
 - 2. Conduct annual testing of the carbon activity for the carbon in each carbon bed. Carbon activity shall be tested in accordance with the butane working capacity test of the American Society for Testing and Materials (ASTM) Method D 5228-92 (incorporated by reference, see §63.14), or by another suitable procedure as recommended by the manufacturer.
 - 3. Conduct monthly measurements of the carbon bed outlet volatile organic compounds (VOC) concentration over the last five minutes of an adsorption cycle for each carbon bed, documenting the highest measured VOC concentration. Measurements shall be made

using a portable analyzer, in accordance with 40 CFR Part 60, Appendix A-7, EPA Method 21 for open-ended lines.

- b. Develop and submit to the Air Pollution Control Program a monitoring and inspection plan that describes the permittee's approach for meeting the following requirements:
 1. The lowest maximum required vacuum level and duration needed to assure regeneration of the carbon beds shall be determined by an engineering analysis or from the manufacturer's recommendation and shall be documented in the monitoring and inspection plan.
 2. The permittee shall verify, during each day of operation of the loading rack, the proper valve sequencing, cycle time, gasoline flow, purge air flow, and operating temperatures. Verification shall be through visual observation or through an automated alarm or shutdown system that monitors and records system operation.
 3. The permittee shall perform semi-annual preventive maintenance inspections of the carbon adsorption system according to the recommendations of the manufacturer of the system.
 4. The monitoring plan developed under this section shall specify conditions that would be considered malfunctions of the carbon adsorption system during the inspections or automated monitoring performed under Paragraphs [2)a)1.ii.b)1)] through [2)a)1.ii.b)3)] of this section, describe specific corrective actions that will be taken to correct any malfunction, and define what the permittee would consider to be a timely repair for each potential malfunction.
 5. The permittee shall document the maximum vacuum level observed on each carbon bed from each daily inspection and the maximum VOC concentration observed from each carbon bed on each monthly inspection as well as any system malfunction, as defined in the monitoring and inspection plan, and any activation of the automated alarm or shutdown system with a written entry into a log book or other permanent form of record. Such record shall also include a description of the corrective action taken and whether such corrective actions were taken in a timely manner, as defined in the monitoring and inspection plan, as well as an estimate of the amount of gasoline loaded during the period of the malfunction.
- ii) Where a refrigeration condenser system is used, a continuous parameter monitoring system (CPMS) capable of measuring temperature shall be installed immediately downstream from the outlet to the condenser section. Alternatively, a CEMS capable of measuring organic compound concentration may be installed in the exhaust air stream.
- iii) Where a thermal oxidation system other than a flare is used, the permittee shall monitor the operation of the system as specified in the following paragraphs:
 - i. A CPMS capable of measuring temperature shall be installed in the firebox or in the ductwork immediately downstream from the firebox in a position before any substantial heat exchange occurs.
 - ii. As an alternative to the CPMS described above, the permittee may choose to meet the following requirements:
 - a. The presence of a thermal oxidation system pilot flame shall be monitored using a heat-sensing device, such as an ultraviolet beam sensor or a thermocouple, installed in proximity to the pilot light to indicate the presence of a flame.
 - b. Develop and submit to the Air Pollution Control Program a monitoring and inspection plan that describes the permittee's approach for meeting the following requirements:
 1. The thermal oxidation system shall be equipped to automatically prevent gasoline loading operations from beginning at any time that the pilot flame is absent.

2. The permittee shall verify, during each day of operation of the loading rack, the proper operation of the assist-air blower, the vapor line valve, and the emergency shutdown system. Verification shall be through visual observation or through an automated alarm or shutdown system that monitors and records system operation.
 3. The permittee shall perform semi-annual preventive maintenance inspections of the thermal oxidation system according to the recommendations of the manufacturer of the system.
 4. The monitoring plan developed under this section shall specify conditions that would be considered malfunctions of the thermal oxidation system during the inspections or automated monitoring performed under Paragraphs (ii) and (iii) of this section, describe specific corrective actions that will be taken to correct any malfunction, and define what the permittee would consider to be a timely repair for each potential malfunction.
 5. The permittee shall document any system malfunction, as defined in the monitoring and inspection plan, and any activation of the automated alarm or shutdown system with a written entry into a log book or other permanent form of record. Such record shall also include a description of the corrective action taken and whether such corrective actions were taken in a timely manner, as defined in the monitoring and inspection plan, as well as an estimate of the amount of gasoline loaded during the period of the malfunction.
- iv) Monitoring an alternative operating parameter or a parameter of a vapor processing system other than those listed in Paragraphs [2)a)1.] through [2)a)3.] of this section, (i.e. §63.11092(b)(1)(i) through (iii)), will be allowed upon demonstrating to the Director's satisfaction that the alternative parameter demonstrates continuous compliance with the emission standard in §63.11088(a), i.e. to reduce emissions of total organic HAP or TOC by 95 weight-percent.
- b) Where a flare meeting the requirements in §63.11(b) is used, a heat-sensing device, such as an ultraviolet beam sensor or a thermocouple, must be installed in proximity to the pilot light to indicate the presence of a flame.
- c) Determine an operating parameter value based on the parameter data monitored during the performance test, supplemented by engineering assessments and the manufacturer's recommendations.
- d) Provide for the Director's approval the rationale for the selected operating parameter value, monitoring frequency, and averaging time, including data and calculations used to develop the value and a description of why the value, monitoring frequency, and averaging time demonstrate continuous compliance with the emission standard in §63.11088(a), i.e. to reduce emissions of total organic HAP or TOC by 95 weight-percent.
- e) If the permittee has chosen to comply with the performance testing alternatives provided under Paragraph [1)b)] or [1)c)] of this section, (i.e. §63.11092(a)(2) or (a)(3)), the monitored operating parameter value may be determined according to the following provisions:
- i) Monitor an operating parameter that has been approved by the Air Pollution Control Program and is specified in your facility's current enforceable operating permit. At the time that the Department of Natural Resources requires a new performance test, you must determine the monitored operating parameter value according to the requirements specified in Paragraphs [2)a)] through [2)c)] of this section, (i.e. §63.11092(b)).
 - ii) Determine an operating parameter value based on engineering assessment and the manufacturer's recommendation and submit the information specified in Paragraph [2)d)] of this section, (i.e. §63.11092(b)(4)), for approval by the Air Pollution Control Program. At the time that the Director requires a new performance test, you must determine the monitored operating parameter value according to the requirements specified in Paragraphs [2)a)] through [2)d)] of this section, (i.e. §63.11092(b)).

- iii) For performance tests performed after the initial test required under Paragraph [1] of this section, (i.e. §63.11092(a)), the permittee shall document the reasons for any change in the operating parameter value since the previous performance test.

Recordkeeping Requirements:

Closed Vent System and Control Device, §63.11094(a), §63.11094(f) and §60.115b(c):

- 1) The permittee shall keep records as specified in §60.115b.
 - a) After installing a closed vent system and control device other than a flare in accordance with §60.112b (a)(3) or (b)(1), the permittee shall keep the following records:
 - i) A copy of the operating plan.
 - ii) A record of the measured values for all parameters that were monitored to document compliance with the permit condition.
 - b) After installing a closed vent system and flare to comply with §60.112b, the permittee shall maintain records of all periods of operation during which the flare pilot flame is absent.
- 2) The permittee shall maintain the up-to-date and readily available records of the following items associated with the continuous parameter monitoring system:
 - a) The continuous monitoring data required in Monitoring/Testing Requirements, Paragraph [2] above. The date and time of day shall be indicated at reasonable intervals on this record.
 - b) The monitoring and inspection plan described in Monitoring/Testing Requirements, Paragraph [2)a)1.ii)b) or [2)a)3.ii)b), above.
 - c) A record of all system malfunctions, as specified in Monitoring/Testing Requirements, Paragraph [2)a)1.ii)b)5) or [2)a)3.ii)b)5), above.
- 3) The permittee shall maintain a record of all data and calculations, engineering assessments, and manufacturer's recommendations used in determining the operating parameter value described in Monitoring/Testing Requirements, Paragraphs [2)c), [2)d) or [2)e)], above. These records shall be maintained on file for a minimum of five years, or until a new performance test is conducted and approved by the Director, whichever is longer.
- 4) If the permittee requests approval to use a vapor processing system or monitor an operating parameter other than those specified in §63.11092(b), the permittee shall submit a description of planned reporting and recordkeeping procedures to the Missouri Department of Natural Resources, Air Pollution Control Program. The Director will specify appropriate reporting and recordkeeping requirements as part of the review of the permit application.
- 5) The permittee shall maintain records of any performance tests on file for a minimum of five years or until another performance test is performed, whichever is longer.
- 6) The permittee shall maintain any additional records specified by §63.10(b).
- 7) The permittee shall keep all records for a minimum of five years unless a longer period is specified with the requirement. All records shall be kept in such a manner that they can be readily accessed within 24 hours. Records may be kept in hard copy or computer-readable form including, but not limited to, on paper, microfilm, computer, floppy disk, magnetic tape, or microfiche.
- 8) The permittee shall immediately make any records available to Missouri Department of Natural Resources' personnel upon request.

Reporting Requirements:

Notifications required by §63.11093 and §63.9 for 40 CFR Part 63, Subpart BBBBBB:

- 1) The permittee shall submit the following notifications to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 as applicable for each external floating roof tank that will comply with 40 CFR Part 63 Subpart BBBBBB using a closed vent and control device described in 40 CFR Part 60 Subpart Kb:

- a) The permittee shall submit an initial notification as specified in §63.9(b) to the Air Pollution Control Program which indicates that the installation is subject to 40 CFR Part 63 Subpart BBBBBB. For existing tanks the initial notification is due by May 9, 2008.
- b) The permittee shall submit a Notification of Compliance Status as specified in §63.9(h). The Notification of Compliance Status must state which of the compliance options referenced in Table 1 to Subpart BBBBBB is used to comply with the subpart.
- c) The permittee shall submit a written Notification of Performance Test as specified in §69.9(e) prior to initiating testing intended to demonstrate compliance with the compliance option selected. The Notification must be submitted at least 60 calendar days before the performance test is scheduled to begin to allow the Missouri Department of Natural Resources, Air Pollution Control Program to review and approve the site-specific test plan required under §63.7(c), if requested by the Department of Natural Resources, and to have an observer present during the test.
- d) The permittee shall submit additional notifications specified in §63.9, as applicable.

Reports required for a Closed Vent System and Control Device by §63.11095(a)(1) and §60.115b(d):

- 2) After installing a closed vent system and flare to comply with §60.112b, the permittee shall submit the following reports:
 - a) A report containing the measurements required by §60.18(f) (1), (2), (3), (4), (5), and (6) shall be furnished to the Air Pollution Control Program as required by §60.8 of the General Provisions. This report shall be submitted within 6 months of the initial start-up date.
 - b) Annual reports of all periods recorded under Recordkeeping Requirements, Paragraph [2] above in which the pilot flame was absent shall be furnished to the Air Pollution Control Program.

General, All:

- 3) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C. (III) and Section V of this permit.

Attachment G-2

Permit Conditions for Tanks Subject to 40 CFR 63 Subpart BBBBBB that elect to control emissions using an Internal Floating Roof according to the requirements of 40 CFR 60 Subpart Kb

Table 1 to Subpart BBBBBB of Part 63 - Applicability Criteria, Emission Limits, and Management Practices for Storage Tanks: Scenario 2(b)

Emission/Operational Limitations:

- 1) The permittee shall equip each internal floating roof gasoline storage tank so as to meet the applicable requirements of 40 CFR 60.112b(a)(1), i.e. a fixed roof in combination with an internal floating roof which meets the following specifications, except for the secondary seal requirements under 40 CFR 60.112b(a)(1)(ii)(B) and the requirements in 40 CFR 60.112b(a)(1)(iv) through (ix):
 - a) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
 - b) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
 - i) 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.
 - ii) 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.
 - c) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
- 2) If the gasoline storage tank is subject to, and complies with, the control requirements of 40 CFR Part 60, Subpart Kb of this chapter, the storage tank will be deemed in compliance with the permit condition. This determination must be reported in the Notification of Compliance Status report under § 63.11093(b).

Monitoring/Recordkeeping Requirements:

- 1) The permittee shall perform the following inspections as described in 40 CFR 60.113b(a) for each internal floating roof tank that will comply with 40 CFR 63 Subpart BBBBBB using the methods described in 40 CFR 60 Subpart Kb. After installing the equipment required to meet 40 CFR 60.112b(a)(1), the permittee shall:
 - a) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with gasoline. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage vessel.
 - b) For Vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the gasoline inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel

cannot be emptied within 45 days, a 30-day extension may be requested from the Missouri Department of Natural Resources, Air Pollution Control Program in the inspection report required in **Reporting Requirements, Paragraph [2]** below, (reference: 40 CFR 60.115b(a)(3)). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

- c) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than ten percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in **Paragraph [1b)]** of this section, (reference: 40 CFR 60.113b(a)(2)).
- 2) The permittee shall notify the Missouri Department of Natural Resources, Air Pollution Control Program in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by **Paragraphs [1a)] and [1c)]** of this section, (reference: 40 CFR 113b(a)(1) and (a)(4)), to afford the Department of Natural Resources the opportunity to have an observer present. If the inspection required by **Paragraph [1c)]** of this section, (reference: 40 CFR 113b(a)(4)), is not planned and the permittee could not have known about the inspection 30 days in advance or refilling the tank, the permittee shall notify the Missouri Department of Natural Resources, Air Pollution Control Program at least seven days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Missouri Department of Natural Resources, Air Pollution Control Program at least seven days prior to the refilling.
- 3) The permittee shall keep a record of each inspection performed as required above. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

Reporting Requirements:

- 1) The permittee shall submit the following reports as described in 40 CFR 60.115b(a) for each internal floating roof tank that will comply with 40 CFR 63 Subpart BBBBBB using the methods described in 40 CFR 60 Subpart Kb:
 - a) After installing the internal floating roof as described in **Emission/Operational Limitations** above, the permittee shall submit a report to the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, that describes the control equipment and certifies that the control equipment meets the specifications of 40 CFR 60.112b(a)(1) and 40 CFR 60.113b(a)(1). This report shall be an attachment to the notification required by 40 CFR 60.7(a)(3), which requires a notification of the actual date of initial startup of the tank as equipped with the control equipment that meets the specifications. The report shall be postmarked within 15 days after the actual date of initial startup.
 - b) If any of the conditions described in **Monitoring/Recordkeeping Requirements, Paragraph [1b)]**, (reference: 40 CFR 60.113b(a)(2)), are detected during the annual visual inspection required, the permittee shall submit a report to the Missouri Department of Natural Resources, Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 within 30 days of the

inspection. The report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

Attachment G-3

Permit Conditions for Tanks Subject to 40 CFR 63 Subpart BBBBBB that elect to control emissions using an Internal Floating Roof according to the requirements of 40 CFR 63 Subpart WW

Table 1 to Subpart BBBBBB of Part 63 - Applicability Criteria, Emission Limits, and Management Practices for Storage Tanks: Scenario 2(d)(1) for an Internal Floating Roof Tank

Emission/Operational Limitations:

- 1) The permittee shall equip and operate each internal floating roof gasoline storage tank according to the applicable requirements of 40 CFR 63.1063(a)(1) and (b) as listed below:
 - a) Equip each internal floating roof tank (IFR) with one of the following rim seal configurations.
 - i) A liquid-mounted seal.
 - ii) A mechanical shoe seal.
 - iii) Two seals mounted one above the other. The lower seal may be vapor-mounted.
 - b) Each IFR must meet the following operational requirements:
 - i) The floating roof shall float on the stored liquid surface at all times, except when the floating roof is supported by its leg supports or other support devices (e.g., hangers from the fixed roof).
 - ii) When the storage vessel is storing liquid, but the liquid depth is insufficient to float the floating roof, the process of filling to the point of refloating the floating roof shall be continuous and shall be performed as soon as practical.
 - iii) Each cover over an opening in the floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall be closed at all times, except when the cover must be open for access.
 - iv) Each automatic bleeder vent (vacuum breaker vent) and rim space vent shall be closed at all times, except when required to be open to relieve excess pressure or vacuum, in accordance with the manufacturer's design.
 - v) Each unslotted guidepole cap shall be closed at all times except when gauging the liquid level or taking liquid samples.

Monitoring/Recordkeeping Requirements:

- 1) The permittee shall perform inspections as described in 40 CFR 63.1063(c)(1) for each internal floating roof tank that will comply with 40 CFR 63 Subpart BBBBBB using the methods described in 40 CFR 63 Subpart WW above. Internal floating roofs shall be inspected as follows:
 - a) Before the initial filling of the storage vessel, floating roof (IFR) inspections shall be conducted by visually inspecting the floating roof deck, deck fittings, and rim seals from within the storage vessel. The inspection may be performed entirely from the top side of the floating roof, as long as there is visual access to all deck components specified in **Emission/Operation Limitations, Paragraph [1a]**, (reference: 40 CFR 63.1063(a)(1)). Any of the conditions described below constitutes an inspection failure:
 - i) Stored liquid on the floating roof.
 - ii) Holes or tears in the primary or secondary seal (if one is present).
 - iii) Floating roof deck, deck fittings, or rim seals that are not functioning as designed as specified in **Emission/Operational Limitations, Paragraph [1a]** above, (reference: 40 CFR 63.1063(a)).
 - iv) Failure to comply with the operational requirements of **Emission/Operation Limitations, Paragraph [1b]** above, (reference: 40 CFR 63.1063(b)).
 - v) Gaps of more than 0.32 centimeters (1/8inch) between any deck fitting gasket, seal, or wiper required by **Emission/Operation Limitations, Paragraph [1a]**, (reference: 40 CFR 63.1063(a)(1)), and any surface that it is intended to seal.

- b) The permittee shall perform subsequent inspections according to the following schedule:
 - i) At least once per year a tank-top inspection shall be conducted on each IFR by visually inspecting the floating roof deck, deck fittings, and rim seal through openings in the fixed roof. Any of the conditions described in Paragraph [1a)], items 1 through 4, of this section, (reference: 40 CFR 63.1063(d)(1)(i) – (iv)), constitutes an inspection failure. Identification of holes or tears in the rim seal is required only for the seal that is visible from the top of the storage vessel.
 - ii) Each time the storage vessel is completely emptied and degassed, or every 10 years, whichever occurs first, the IFR shall be inspected as specified in Paragraph [1a)] of this section, (reference: 40 CFR 63.1063(d)(1)).
- c) Instead of the inspection frequency specified in Paragraph [1b)] above, (reference: 40 CFR 63.1063(c)(1)(i)), internal floating roof tanks with two rim seals may be inspected as specified in Paragraph [1a)] of this section, (reference: 40 CFR 63.1063(d)(1)), each time the storage vessel is completely emptied and degassed, or every five years, whichever occurs first.
- 2) The permittee shall repair conditions causing inspection failures under Paragraph [1)] of this section as specified below:
 - a) If the inspection is performed while the storage vessel is not storing liquid, repairs shall be completed before the refilling of the storage vessel with liquid.
 - b) If the inspection is performed while the storage vessel is storing liquid, repairs shall be completed or the vessel removed from service within 45 days. If a repair cannot be completed and the vessel cannot be emptied within 45 days, the permittee may use up to 2 extensions of up to 30 additional days each. Documentation of a decision to use an extension shall include a description of the failure, shall document that alternate storage capacity is unavailable, and shall specify a schedule of actions that will ensure that the control equipment will be repaired or the vessel will be completely emptied as soon as practical.
- 3) The permittee shall notify the Missouri Department of Natural Resources Air Pollution Control Program in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by Paragraph [1a)] of this section, (reference: 40 CFR 63.1063(d)(1)), to afford the Department of Natural Resources the opportunity to have an observer present. If the inspection 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 Department of Natural Resources at least seven days before the inspection. 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 Department of Natural Resources at least seven days prior to the refilling.
- 4) The permittee shall keep a record of the dimensions of the storage vessel, an analysis of the capacity of the storage vessel, and an identification of the liquid stored for each storage tank.
- 5) The permittee shall keep a record of each inspection performed as required by Paragraph [1)] above. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). If the floating roof fails inspection, the record shall also include a description of all inspection failures, a description of all repairs and the dates that they were made, and the date that the storage vessel was removed from service, if applicable.
- 6) The permittee shall keep a record of the date when a floating roof is set on its legs or other support devices. The permittee shall also keep a record of the date when the roof was refloated, and the record shall indicate whether the process of refloating was continuous.
- 7) The permittee shall keep the documentation required by Paragraph [2b)] of this section, (reference: 40 CFR 63.1063(e)(2)), in the event that an extension is requested and/or used.

- 8) The permittee shall keep the records described in **Paragraph [4]** above for as long as the liquid is stored or a minimum of five years, whichever is longer. The permittee shall keep the records described in **Paragraphs [5], [6], or [7]** above for a minimum of five years. All records shall be kept in such a manner that they can be readily accessed within 24 hours. Records may be kept in hard copy or computer-readable form including, but not limited to, on paper, microfilm, computer, floppy disk, magnetic tape, or microfiche.

Reporting Requirements:

- 1) The permittee shall submit the following reports as described in 40 CFR 63.1066 for each internal floating roof tank that will comply with 40 CFR 63 Subpart BBBB using the methods described in 40 CFR 63 Subpart WW:
- a) After installing the internal floating roof as described in **Emission/Operational Limitations** above, the permittee shall submit a report to the Missouri Department of Natural Resources, Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 that describes the control equipment and certifies that the control equipment meets the specifications of 40 CFR 63.1063(a)(1), 40 CFR 63.1063(b), and 40 CFR 63.1063(c). The report shall be postmarked within 15 days after the actual date of initial startup of the tank as equipped with the control equipment that meets the specifications.
 - b) If inspection failures described in **Monitoring/Recordkeeping Requirements, Paragraphs [1)a), b), or c)]**, (reference: 40 CFR 63.1063(c) and (d)), are detected, the permittee shall submit a copy of the inspection record to the Missouri Department of Natural Resources, Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 within 30 days of the inspection. The report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made. The report shall also include any extensions requested and/or used under **Monitoring/Recordkeeping Requirements, Paragraph [2)b)]**, (reference: 40 CFR 63.1063(e)(2)).

Attachment G-4

Permit Conditions for Tanks Subject to 40 CFR 63 Subpart BBBBBB that elect to control emissions using an External Floating Roof according to the requirements of 40 CFR 63 Subpart WW

Table 1 to Subpart BBBBBB of Part 63 - Applicability Criteria, Emission Limits, and Management Practices for Storage Tanks: Scenario 2(d)(2) for External Floating Roof Tanks

Equipment / Procedural Requirements:

External Floating Roof, §63.11087 and §63.1063(a) & (b):

- 1) The permittee shall equip and operate each external floating roof gasoline storage tank according to the applicable requirements of §63.1063(a)(1) and (b), except that if the storage tank does not currently meet the requirements of §63.1063(a)(1), the tank shall instead be equipped and operated according to the applicable requirements of §63.1063(a)(2). Each designated tank shall meet the following specifications for an external floating roof:
 - a) Equip each external floating roof tank (EFR) with one of the following rim seal configurations.
 - i) A liquid-mounted seal and a secondary seal.
 - ii) A mechanical shoe seal and a secondary seal. The upper end of the shoe(s) shall extend a minimum of 61 centimeters (24 inches) above the stored liquid surface.
 - b) If an external floating roof storage tank does not currently meet the requirements described in **Paragraph [1)a]** above, openings through the deck of the floating roof (deck fittings) shall instead meet the following requirements:
 - i) Each opening except those for automatic bleeder vents (vacuum breaker vents) and rim space vents shall have its lower edge below the surface of the stored liquid.
 - ii) Each opening except those for automatic bleeder vents (vacuum breaker vents), rim space vents, leg sleeves, and deck drains shall be equipped with a deck cover. The deck cover shall be equipped with a gasket between the cover and the deck.
 - iii) Each automatic bleeder vent (vacuum breaker vent) and rim space vent shall be equipped with a gasketed lid, pallet, flapper, or other closure device.
 - iv) Each opening for a fixed roof support column may be equipped with a flexible fabric sleeve seal instead of a deck cover.
 - v) Each opening for a sample well or deck drain (that empties into the stored liquid) may be equipped with a slit fabric seal or similar device that covers at least 90 percent of the opening, instead of a deck cover.
 - vi) Each cover on access hatches and gauge float wells shall be designed to be bolted or fastened when closed.
 - vii) Each opening for an unslotted guidepole shall be equipped with a pole wiper, and each unslotted guidepole shall be equipped with a gasketed cap on the top of the guidepole.
 - viii) Each opening for a slotted guidepole shall be equipped with one of the control device configurations specified in below:
 - (1) A pole wiper and a pole float. The wiper or seal of the pole float shall be at or above the height of the pole wiper.
 - (2) A pole wiper and a pole sleeve.
 - c) Each EFR shall meet the following operational requirements:
 - i) The floating roof shall float on the stored liquid surface at all times, except when the floating roof is supported by its leg supports or other support devices (e.g., hangers from the fixed roof).
 - ii) When the storage vessel is storing liquid, but the liquid depth is insufficient to float the floating roof, the process of filling to the point of refloating the floating roof shall be continuous and shall be performed as soon as practical.

- iii) Each cover over an opening in the floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall be closed at all times, except when the cover must be open for access.
- iv) Each automatic bleeder vent (vacuum breaker vent) and rim space vent shall be closed at all times, except when required to be open to relieve excess pressure or vacuum, in accordance with the manufacturer's design.
- v) Each unslotted guidepole cap shall be closed at all times except when gauging the liquid level or taking liquid samples.

Monitoring / Recordkeeping Requirements:

Internal Floating Roof, §63.11092(e)(1), §63.11094(a), and §63.1063(c) & (d):

- 1) The permittee must perform inspections as described in §63.1063(c)(2) for each external floating roof tank that will comply with 40 CFR Part 63 Subpart BBBB using the methods described in 40 CFR Part 63 Subpart WW, above. External Floating Roofs shall be inspected as follows:
 - a) Within 90 days after the initial filling of the storage vessel, the primary and secondary rim seals shall be inspected to determine the presence and size of gaps between the rim seals and the wall of the storage vessel by the procedures specified in **Paragraph [1a)1]** of this section, (i.e. §63.1063(d)(3)(i)). Any exceedance of the gap requirements specified in **Paragraphs [1a)2.] and [1a)3.]** of this section, (i.e. §63.1063(d)(3)(ii) and (d)(3)(iii)), constitutes an inspection failure.
 - i) Rim seals shall be measured for gaps at one or more levels while the EFR is floating as specified in below:
 - (1) The inspector shall hold a 0.32 centimeter (1/8 inch) diameter probe vertically against the inside of the storage vessel wall, just above the rim seal, and attempt to slide the probe down between the seal and the vessel wall. Each location where the probe passes freely (without forcing or binding against the seal) between the seal and the vessel wall constitutes a gap.
 - (2) The length of each gap shall be determined by inserting the probe into the gap (vertically) and sliding the probe along the vessel wall in each direction as far as it will travel freely without binding between the seal and the vessel wall. The circumferential length along which the probe can move freely is the gap length.
 - (3) The maximum width of each gap shall be determined by inserting probes of various diameters between the seal and the vessel wall. The smallest probe diameter should be 0.32 centimeter, and larger probes should have diameters in increments of 0.32 centimeter. The diameter of the largest probe that can be inserted freely anywhere along the length of the gap is the maximum gap width.
 - (4) The average width of each gap shall be determined by averaging the minimum gap width (0.32 centimeter) and the maximum gap width.
 - (5) The area of a gap is the product of the gap length and average gap width.
 - (6) The ratio of accumulated area of rim seal gaps to storage vessel diameter shall be determined by adding the area of each gap, and dividing the sum by the nominal diameter of the storage vessel. This ratio shall be determined separately for primary and secondary rim seals.
 - ii) The ratio of seal gap area to vessel diameter for the primary seal shall not exceed 212 square centimeters per meter of vessel diameter (10 square inches per foot of vessel diameter), and the maximum gap width shall not exceed 3.81 centimeters (1.5 inches).
 - iii) The ratio of seal gap area to vessel diameter for the secondary seal shall not exceed 21.2 square centimeters per meter (1 square inch per foot), and the maximum gap width shall not exceed 1.27 centimeters (0.5 inches), except when the secondary seal must be pulled back or removed to inspect the primary seal.
 - b) The secondary seal shall be inspected at least once every year, and the primary seal shall be inspected at least every five years, as specified in **Paragraphs [1a)1] through [1a)3]** above, (i.e. 63.1063(d)(3)).

- c) Each time the storage vessel is completely emptied and degassed, or every 10 years, whichever occurs first, the EFR shall be inspected by visually inspecting the floating roof deck, deck fittings, and rim seals from within the storage vessel. The inspection may be performed entirely from the top side of the floating roof, as long as there is visual access to all deck components specified in **Equipment/Procedural Requirements, Paragraph [1)a]**, (i.e. §63.1063(a)(1)). Any of the conditions described below constitutes an inspection failure:
- i) Stored liquid on the floating roof.
 - ii) Holes or tears in the primary or secondary seal (if one is present).
 - iii) Floating roof deck, deck fittings, or rim seals that are not functioning as designed as specified in **Equipment/Procedural Requirements, Paragraph [1)a]** above, (i.e. §63.1063(a)(1) or 63.1063(a)(2)).
 - iv) Failure to comply with the operational requirements of **Equipment/Procedural Requirements, Paragraph [1)b]** above, (i.e. §63.1063(b)).
 - v) Gaps of more than 0.32 centimeters (1/8 inch) between any deck fitting gasket, seal, or wiper required by **Equipment/Procedural Requirements, Paragraph [1)a]**, (i.e. §63.1063(a)(1)), and any surface that it is intended to seal.
- d) If the permittee determines that it is unsafe to perform the floating roof inspections specified in **Paragraphs [1)a and [1)b]** above, (i.e. §63.1063(c)(2)(i) and (c)(2)(ii)), the permittee shall comply with the requirements listed below:
- i) The inspections shall be performed no later than 30 days after the determination that the floating roof is unsafe.
 - ii) The storage vessel shall be removed from liquid service no later than 45 days after determining the floating roof is unsafe. If the vessel cannot be emptied within 45 days, the permittee may utilize up to two extensions of up to 30 additional days each. If the vessel cannot be emptied within 45 days, the permittee may utilize up to two extensions of up to 30 additional days each. Documentation of a decision to use an extension shall include an explanation of why it was unsafe to perform the inspection, documentation that alternative storage capacity is unavailable, and a schedule of actions that will ensure that the vessel will be emptied as soon as practical.
- 2) The permittee shall repair conditions causing inspection failures under **Paragraph [1)]** of this section as specified below:
- a) If the inspection is performed while the storage vessel is not storing liquid, repairs shall be completed before the refilling of the storage vessel with liquid.
 - b) If the inspection is performed while the storage vessel is storing liquid, repairs shall be completed or the vessel removed from service within 45 days. If a repair cannot be completed and the vessel cannot be emptied within 45 days, the permittee may use up to 2 extensions of up to 30 additional days each. Documentation of a decision to use an extension shall include a description of the failure, shall document that alternate storage capacity is unavailable, and shall specify a schedule of actions that will ensure that the control equipment will be repaired or the vessel will be completely emptied as soon as practical.
- 3) Notify the Missouri Department of Natural Resources Air Pollution Control Program in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by **Paragraphs [1)a] and [1)c]** of this section, (i.e. §63.1063(d)(1) or (d)(3)), to afford the Department of Natural Resources the opportunity to have an observer present. If the inspection 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 Department of Natural Resources at least seven days before the inspection. 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 Department of Natural Resources at least seven days prior to the refilling.

- 4) The permittee shall keep a record of the dimensions of the storage vessel, an analysis of the capacity of the storage vessel, and an identification of the liquid stored for each storage tank. This record shall be maintained onsite for the life of the tank or a minimum of five years, whichever is longer.
- 5) The permittee shall keep a record of each inspection performed as required by **Paragraph [1]** above. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment. A record shall be kept of EFR seal gap measurements, including the raw data obtained and any calculations performed. If the floating roof fails inspection, the record shall also include a description of all inspection failures, a description of all repairs and the dates that they were made, and the date that the storage vessel was removed from service, if applicable.
- 6) The permittee shall keep a record of the date when a floating roof is set on its legs or other support devices. The permittee shall also keep a record of the date when the roof was refloated, and the record shall indicate whether the process of refloating was continuous.
- 7) The permittee shall keep the documentation required by **Paragraphs [1)d)2.] and [2)b)]** of this section, (i.e. §63.1063(c)(2)(iv)(B) and §63.1063(e)(2)), in the event that an extension is requested and/or used.
- 8) The permittee shall maintain all records for a minimum of five years unless a longer period is specified with the requirement. All records shall be kept in such a manner that they can be readily accessed within 24 hours. Records may be kept in hard copy or computer-readable form including, but not limited to, on paper, microfilm, computer, floppy disk, magnetic tape, or microfiche.
- 9) The permittee shall immediately make any records available to Missouri Department of Natural Resources' personnel upon request.

Reporting Requirements:

Notifications required by §63.11093 and §63.9 for 40 CFR Part 63, Subpart BBBBBB:

- 1) The permittee shall submit the following notifications to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 as applicable for each external floating roof tank that will comply with 40 CFR Part 63 Subpart BBBBBB using the methods described in 40 CFR Part 63 Subpart WW:
 - a) The permittee shall submit an initial notification as specified in §63.9(b) to the Air Pollution Control Program which indicates that the installation is subject to 40 CFR 63 Subpart BBBBBB. For existing tanks the initial notification is due by May 9, 2008.
 - b) The permittee shall submit a Notification of Compliance Status as specified in §63.9(h). The Notification of Compliance Status must state which of the compliance options referenced in Table 1 to Subpart BBBBBB is used to comply with the subpart.
 - c) The permittee shall submit a written Notification of Performance Test as specified in §69.9(e) prior to initiating testing intended to demonstrate compliance with the compliance option selected. The Notification must be submitted at least 60 calendar days before the performance test is scheduled to begin to allow the Missouri Department of Natural Resources, Air Pollution Control Program to review and approve the site-specific test plan required under §63.7(c), if requested by the Department of Natural Resources, and to have an observer present during the test.
 - d) The permittee shall submit additional notifications specified in §63.9, as applicable.

Reports required for Internal Floating Roof Tanks by §63.11095(a)(1) and §63.1066:

- 2) The permittee shall submit the following reports to the Air Pollution Control Program, Enforcement Section, P.O. Pox 176, Jefferson City, MO 65102 as applicable for each external floating roof tank that will comply with 40 CFR Part 63 Subpart BBBBBB using the methods described in 40 CFR Part 63 Subpart WW:

- a) After installing the external floating roof as described in **Equipment/Procedural Requirements** above, the permittee shall submit a report to the Air Pollution Control Program that describes the control equipment and certifies that the control equipment meets the specifications of §63.1063(a)(1), §63.1063(a)(2) [if applicable], §63.1063(b) and §63.0163(c). The report shall be postmarked within 15 days after the actual date of initial startup of the tank as equipped with the control equipment that meets the specifications.
- b) If inspection failures described in **Monitoring/Recordkeeping, Paragraphs [1)a), b), c), or d)]**, (i.e. §63.1063(c) and (d)), are detected, the permittee shall submit a copy of the inspection record to the Air Pollution Control Program within 30 days of the inspection. The report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made. The report shall also include any extensions requested and/or used under **Monitoring/Recordkeeping, Paragraphs [1)d)2.] and [2)b)]**, (i.e. §63.1063(c)(2)(iv)(B) and §63.1063(e)(2)).

General, All:

- 3) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

STATEMENT OF BASIS

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 October 27, 2004;
- 2) 2009 Emissions Inventory Questionnaire, received May 21, 2010, and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 4) United States Environmental Protection Agency document Gasoline Distribution Industry (Stage I) Background Information for Promulgated Standards Final EIS (EPA-453/R-94-002b), Chapter 7.0 Cargo Tank Requirements, Section 7.1 Emission Factors.

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.

40 CFR Part 63 Subpart BBBB, *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities*

This rule was not promulgated at the time the permit application was submitted. The rule applies to area source gasoline distribution bulk terminals, bulk plants, and pipeline facilities. The installation is subject to this rule; the compliance date is January 10, 2011.

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.

Construction Permit 032004-019 special condition states that Truck Loading Rack 2 shall be permanently shut down before the new bays of Truck Loading Rack 3 are started up. Truck Loading Rack 2 has been permanently shut down and removed from the site.

Operating Permit Application Revisions

Truck Loading Rack 3 lists throughput limits from Construction Permit 032004-019 as being applicable in the Operating Permit Application. The special conditions from the permit state that Truck Loading Rack 2 is permanently shut down before the start up of new bays in Truck Loading Rack 3. Throughput limits referenced by the Operating Permit Application are discussed in the Review of Application and state the maximum throughput will be 955.93 million gallons per year (mgpy). Gasoline throughput will be 550 mgpy, distillate fuel no 2 will be 400.93 mgpy, and kerosene will be 5,000 gpy. Because the throughput is not stated as a Construction Permit Special Condition it is not listed as an Operating Permit Condition.

Operating Permit Revisions

The previous Operating Permit (OP2000053) listed three plant wide conditions. These conditions were 10 CSR 10-6.170 *Restriction of Particulate Matter to Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.250 *Asbestos Projects – Certification, Accreditation and Business Exemption Requirements*, and 10 CSR 10-6.080 *Emission Standards for Hazardous Air Pollutants*.

10 CSR 10-6.170 is in the core permit requirement section of this permit and is included for all installations in Missouri.

10 CSR 10-6.250 and 10 CSR 6.080 are referenced in the Statement of Basis under National Emissions Standards for Hazardous Air Pollutants Applicability.

Construction Permit Revisions

The following revisions were made to construction permits for this installation:

None.

Facility Permit History

Permit Number	Description
0287-006	Construction of a 4-bay bottom loading truck rack - replaced by 102000-034
0188-008	Construction of fuel tanks - replaced by 0692-024
0692-024	Increased throughput for two tanks – 1907 and 1908
0195-008	Construction of a 10,000 gallon tank – IVD additive tank
OP2000-053	Previous Operating Permit
102000-034	Addition of two bays to truck loading rack 3
122000-009	Temporary permit for use of a portable emission control system on TLR3
082003-009	Temporary permit for use of a portable emission control system on TLR3
032004-019	Shut down loading rack 2 increase truck loading rack 3 by 2 bays
092004-005	Temporary permit for use of a portable emission control system on TLR3
092004-005A	Temporary permit for use of a portable emission control system on TLR3
OP2011-040	The current operating permit

Emission Inventory Questionnaire

The Emission Inventory Questionnaire lists multiple storage tanks for with the same emission unit. EP1 are gasoline storage tanks which include Tanks 1901, 1902, 1905, 1906, 1908, 1909 (ethanol), and 1962. EP6 are distillate Tanks 1902, 1903, 1904, 1907, and 1961.

New Source Performance Standards (NSPS) Applicability

- 1) 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, 1984* is not applicable to the storage tanks at this facility because the petroleum liquid storage tanks at this facility were not constructed or modified between the dates of May 18, 1978, and July 23, 1984.

- 2) 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 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* apply the tanks at this facility depending on their dates of construction or modification.
- 3) 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*
 - a) This rule applies to Tank 1907 (EU1907). Because this tank stores no volatile organic liquid having a vapor pressure greater than distillate fuel oil no. 2 (0.0099 psia at 70°F), only the recordkeeping requirements in §63.116b(a) and (b) apply.
- 4) 40 CFR Part 60, Subpart XX, *Standards of Performance for Bulk Gasoline Terminals*
 - a) This rule is applicable to Truck Liquid Loading Rack 3 and Vapor Recovery Unit (EU0010) and 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. [10 CSR 10-6.065(6)(C)(b)I]

None of the other New Source Performance Standards (NSPS) apply to this installation.

Maximum Achievable Control Technology (MACT) Applicability

10 CSR 10-6.075, Maximum Achievable Control Technology Regulations

40 CFR Part 63 Subpart R – *National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)*

This rule does not apply because the facility is not a major source (10 tpy or more of any individual HAP or 25 tpy or more of any combination of HAP).

40 CFR Part 63 Subpart WW - *National Emission Standards for Storage Vessels (Tanks) - Control Level 2*

- 1) The provisions of this subpart apply only if specifically referenced by another applicable rule. This rule was determined not to apply to the installation because no applicable subpart of 40 CFR 60, 61, or 63 references its use.
- 2) As discussed below under “Maximum Available Control Technology (MACT) Applicability”, the installation was determined to be subject to 40 CFR Part 63, Subpart BBBB. The installation may elect to comply with the control requirements for storage tanks found in this rule using specified provisions of 40 CFR Part 63, Subpart WW. However, the use of 40 CFR Part 63, Subpart WW for the purpose of compliance with 40 CFR Part 63, Subpart BBBB is included under the discussion of MACT Applicability for Subpart BBBB and was not determined to cause these tanks to be subject to Subpart WW.

40 CFR Part 63 Subpart BBBB - *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities*

This rule was determined to be applicable to the installation because the Cape Girardeau Terminal is a bulk gasoline terminal which is not subject to the control requirements of 40 CFR Part 63, Subpart R. The rule provides compliance requirements for storage tanks and loading racks and for all equipment

and components in vapor or liquid gasoline service. Table 1, below, summarizes the review of equipment located at the installation. Equipment determined to be “in gasoline service” is subject to this rule. The compliance date is January 10, 2011.

TABLE 1 – Review of Equipment				
Equipment	Emission Unit ID	Roof Configuration	In Gasoline Service?	Basis
Tank 1907	EU1907	fixed	No	Construction Permit 0692-024 condition
Tank 1901	EU1901	domed external floating	Yes	EIQ stated tanks to be Gasoline Storage Tank
Tank 1902	EU1902	domed external floating	Yes	
Tank 1905	EU1905	domed external floating	Yes	
Tank 1908	EU1908	domed external floating	Yes	
Tank 1906	EU1906	internal floating	Yes	
Tank 1909	EU1909	domed external floating	Yes	
Tank 1961	EU1961	coned internal floating	Yes	
Tank 1962	EU1962	coned internal floating	Yes	
Tank 1903	EU1903	fixed	No	EIQ stated tanks to be Distillate Storage Tank
Tank 1904	EU1904	fixed	No	
Truck Loading Rack 3, six bay with Vapor Recovery Unit	EU0050	Not Applicable	Yes	Truck Loading Rack may be used to load gasoline, distillate, additives, or ethanol.
Additive and dye tanks		Not Applicable	No	Tanks store additives, which are not defined as gasoline.
All pumps, piping, valves, flanges, sample connection systems and other tank and piping components at the installation		Not Applicable	Yes	Any of these components may be used to transfer gasoline.

This rule became effective on January 10, 2008, and the compliance deadline for existing sources of January 10, 2011, will occur within the effective period of this permit. This operating permit includes permit conditions for each emission unit that will be subject to this rule.

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

Since this overlaps with the leak inspection requirements of 40 CFR Part 60 Subpart XX, both requirements are incorporated in a plant-wide emission limitation for the equipment in gasoline service, Permit Condition PW001.

40 CFR Part 63 Subpart R provides an alternative to the monthly leak inspection requirements in §63.424(f), allowing the permittee to implement an instrument leak monitoring program that has been demonstrated to the Director as at least equivalent. The equivalent alternative was not included in the leak inspection requirements for Subpart BBBBBB in §63.11089. However, under the recordkeeping requirements for Subpart BBBBBB in §63.11094(d), the use of an instrument program presented as an option, i.e. *“for facilities electing to implement an instrument program under §63.11089, the record shall contain a full description of the program.”* Therefore, the alternative allowing for an instrument program was included as an option in EU0050-002.

- 2) Storage Tanks 1901, 1902, 1905, 1906, 1908, 1909, 1961, and 1962 are subject to the control and management requirements of §63.11087. Table 1 to Subpart BBBBBB of Part 63 provides several options for controlling emissions, depending on the size and roof configuration of the tank. Table 2 presents the control options available for the tanks determined to be in gasoline service at the installation:

TABLE 2 – Control Options Available for Storage Tanks based on Table 1 to Subpart BBBBBB		
1. Control Option for Tanks < 75m³ Capacity: All tanks in gasoline service with a capacity of less than 75 m ³ (19,813 gallons) are subject to the following control requirements:		
<u>Control Requirement</u>	<u>Applicable Section of Rule</u>	<u>Specified Requirement</u>
Operating	§ 63.11087 and Table 1 to Subpart BBBBBB of Part 63	Equip each gasoline storage tank with a fixed roof that is mounted to the storage tank in a stationary manner, and maintain all openings in a closed position at all times when not in use.
2. Control Options for Tanks ≥ 75 m³ Capacity: All tanks in gasoline service with a capacity of greater than or equal to 75 m ³ (19,813 gallons) are subject to one of the following control requirements, depending on the roof configuration:		
<ul style="list-style-type: none"> • Any tank may comply by meeting the requirements of option (a); • Any existing internal floating roof tank or any tank that installs an internal floating roof may comply by meeting the requirements of option (b) or option (d)(1); • Any existing external floating roof tank or any tank that installs an external floating roof may comply by meeting the requirements of option (c) or option (d)(2). 		
Option 2(a) – Control emissions using a closed vent and control device as described in 40 CFR Part 60, Subpart Kb		
<u>Control Requirement</u>	<u>Applicable Section of Rule</u>	<u>Applicable Referenced Section(s) of 40 CFR Part 60, Subpart Kb</u>
Operating	§ 63.11087 and Table 1 to Subpart BBBBBB of Part 63	<ul style="list-style-type: none"> • Reduce emissions of total organic HAP or TOC by 95 weight-percent with a closed vent system and control device as specified in 40 CFR 60.112b(a)(3) .
Monitoring	§ 63.11092	<ul style="list-style-type: none"> • Conduct a performance test and determine a monitored operating parameter value in accordance with the requirements in Paragraphs (a) through (d) of 40 CFR 63.11092, 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.
Recordkeeping	§ 63.11094	<ul style="list-style-type: none"> • Keep records as specified in 40 CFR 60.115b (c) and (d), except records shall be kept for at least 5 years
Reporting	§ 63.11095	<ul style="list-style-type: none"> • Report information as specified in 40 CFR 60.115b (c) and (d)

TABLE 2 – Control Options Available for Storage Tanks based on Table 1 to Subpart BBBB		
Option 2(b) – Control emissions using an internal floating roof installed and operated as described in 40 CFR Part 60, Subpart Kb		
<u>Control Requirement</u>	<u>Applicable Section of Rule</u>	<u>Applicable Referenced Section(s) of 40 CFR Part 60, Subpart Kb</u>
Operating	§ 63.11087 and Table 1 to Subpart BBBB of Part 63	<ul style="list-style-type: none"> Equip each internal floating roof gasoline storage tank according to the requirements in 40 CFR 60.112b(a)(1), except for the secondary seal requirements under 40 CFR 60.112b(a)(1)(ii)(B) and the requirements in 40 CFR 60.112b(a)(1)(iv) through (ix). <i>[NB: The secondary seals and requirements described in 40 CFR 60.112b(a) may be installed but are not mandatory. If these seals are installed, they must be installed as required by 40 CFR 60.112b and the associated inspections and recordkeeping requirements in 40 CFR 60.113b(a) and 40 CFR 60.115b are required.]</i> Perform inspections of the floating roof system according to the requirements of 40 CFR 60.113b(a) Keep records as specified in 40 CFR 60.115b (a), except records shall be kept for at least 5 years Report information as specified in 40 CFR 60.115b (a)
Monitoring	§ 63.11092	
Recordkeeping	§ 63.11094	
Reporting	§ 63.11095	
Option 2(c) – Control emissions using an external floating roof installed and operated as described in 40 CFR Part 60, Subpart Kb		
<u>Control Requirement</u>	<u>Applicable Section of Rule</u>	<u>Applicable Referenced Section(s) of 40 CFR Part 60, Subpart Kb</u>
Operating	§ 63.11087 and Table 1 to Subpart BBBB of Part 63	<ul style="list-style-type: none"> Equip each external floating roof gasoline storage tank according to the requirements in 40 CFR 60.112b(a)(2), except that the requirements of 40 CFR 60.112b(a)(2)(ii) shall only be required if such storage tank does not currently meet the requirements of 40 CFR 60.112b(a)(2)(i). Perform inspections of the floating roof system according to the requirements of 40 CFR 60.113b(b) Keep records as specified in 40 CFR 60.115b (b), except records shall be kept for at least 5 years Report information as specified in 40 60.115b (b)
Monitoring	§ 63.11092	
Recordkeeping	§ 63.11094	
Reporting	§ 63.11095	
Option 2(d)(1) – Control emissions using an internal floating roof installed and operated as described in 40 CFR Part 63, Subpart WW		
<u>Control Requirement</u>	<u>Applicable Section of Rule</u>	<u>Applicable Referenced Section(s) of 40 CFR Part 63, Subpart WW</u>
Operating	§ 63.11087 and Table 1 to Subpart BBBB of Part 63	<ul style="list-style-type: none"> Equip and operate each internal floating roof gasoline storage tank according to the applicable requirements in 40 CFR 63.1063(a)(1) and (b). Perform inspections of the floating roof system according to the requirements of 40 CFR 63.1063(c)(1). Keep records as specified in 40 CFR 63.1065. Report information as specified in 40 CFR 63.1066.
Monitoring	§ 63.11092	
Recordkeeping	§ 63.11094	
Reporting	§ 63.11095	
Option 2(d)(2) – Control emissions using an external floating roof installed and operated as described in 40 CFR Part 63, Subpart WW		
<u>Control Requirement</u>	<u>Applicable Section of Rule</u>	<u>Applicable Referenced Section(s) of 40 CFR Part 63, Subpart WW</u>

TABLE 2 – Control Options Available for Storage Tanks based on Table 1 to Subpart BBBB		
Operating	§ 63.11087 and Table 1 to Subpart BBBB of Part 63	<ul style="list-style-type: none"> Equip and operate each internal and external floating roof gasoline storage tank according to the applicable requirements in 40 CFR 63.1063(a)(1) and (b), and equip each external floating roof gasoline storage tank according to the requirements of 40 CFR 63.1063(a)(2) if such storage tank does not currently meet the requirements of 40 CFR 63.1063(a)(1).
Monitoring	§ 63.11092	<ul style="list-style-type: none"> Perform inspections of the floating roof system according to the requirements of 40 CFR 63.1063(c)(2).
Recordkeeping	§ 63.11094	<ul style="list-style-type: none"> Keep records as specified in 40 CFR 63.1065.
Reporting	§ 63.11095	<ul style="list-style-type: none"> Report information as specified in 40 CFR 63.1066.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

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

None of the other National Emission Standards for Hazardous Air Pollutants (NESHAP) apply to this installation

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.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

Other Regulatory Determinations.

Part 70 operating permits regulations require records to be kept for a minimum of five (5) years. [10 CSR 10-6.065(6)(C)(b)I] This supersedes construction permits and 40 CFR regulations that state records must be keep for two (2) years.

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

This rule was checked as applicable to the installation in the application and is included in the Core Permit Requirements. The installation is located in the outstate Missouri area and would be subject to the following visible emission limits:

For existing sources, visible emissions may not exceed an opacity of 40%. For new sources, visible emissions may not exceed an opacity of 20%. The allowable exception is that visible emissions with an opacity of up to 60% may be discharged for a period(s) aggregating not more than six (6) minutes in any 60 minutes.

However, all of the emission units emit only volatile organic compounds. These emissions are not in a form to be considered to be visible air contaminants.

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

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

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

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

Prepared by:

Tandi Edelman
Environmental Engineer

CERTIFIED MAIL: 70093410000190188292
RETURN RECEIPT REQUESTED

Mr. Larry Cadle
Cape Girardeau Terminal
P.O. Box 2521
Scott City, MO 77252

Re: Cape Girardeau Terminal, 201-0018
Permit Number: **OP2011-040**

Dear Mr. Cadle:

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.

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 do not hesitate to contact Tandi Edelman at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:tek

Enclosures

c: Southeast Regional Office
PAMS File: 2004-10-072