



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

## DEPARTMENT OF NATURAL RESOURCES

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FEB - 3 2016

Ms. Shiver Nolan  
Senior Compliance Administrator – EHS&T  
Enterprise Refined Products Company, LLC  
P.O. Box 4324  
Houston, TX 77210

RE: New Source Review Temporary Permit Request - Project Number: 2015-12-043

Installation ID Number: 201-0018

Expiration Date: February 1, 2018

Temporary Permit Number: **022016-001**

Dear Ms. Nolan:

The Missouri Department of Natural Resources' Air Pollution Control Program has completed a review of your request to install and operate a Vapor Combustor Unit while the primary Vapor Recovery Unit is offline for maintenance at Enterprise Refined Products Company, LLC – Cape Girardeau Terminal, located in Scott City, Missouri. The Air Pollution Control Program is hereby granting your request to conduct this temporary operation at this location in accordance with Missouri State Rule 10 CSR 10-6.060(3).

Enterprise Refined Products Company, LLC operates a bulk petroleum product terminal in Cape Girardeau, Missouri. The terminal has an existing Vapor Recovery Unit used for carbon adsorption recovery of vapors generated at the gasoline Truck Loading Racks, identified as EP-3 in the installation's Intermediate Operating Permit (OP2014-017). This Vapor Recovery Unit is being scheduled for maintenance that will bring the unit offline for approximately 5 days. In order to continue to control emissions and comply with MACT Subpart BBBBBB as well as NSPS Subpart XX, the use of a temporary Vapor Combustor Unit in place of the Vapor Recovery Unit is required.

Enterprise Refined Products Company, LLC – Cape Girardeau Terminal is authorized to construct and operate subject to the following conditions:

1. Operational Limitation

Enterprise Refined Products Company, LLC – Cape Girardeau Terminal shall not operate the Vapor Combustor Unit for more than fourteen (14) days total for the duration of this permit.

Potential emissions from the 60 MMBtu/hr Vapor Combustor Unit were calculated assuming that it operates continuously at the maximum load for fourteen (14) days. Emission factors were taken from the Vapor Combustor Unit manufacturer's reference manual. A summary of emissions is listed in the table below.

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Table 1. Emissions Summary (tons)

Pollutant	Regulatory De Minimis Levels	Potential Emissions of the Application
Total PM	25.0	0.01
SO <sub>x</sub>	40.0	0.03
NO <sub>x</sub>	40.0	0.01
VOC	40.0	0.86
CO	100.0	1.14
Total HAPs	15.0	N/A

N/A = Not Applicable

Given that the potential emissions are well below 100 tons for each pollutant and ambient air quality standards are expected to be maintained, the proposed temporary permit is granted according to the provisions of Missouri State Rule 10 CSR 10-6.060(3). Subsequent notification should be made to the Air Pollution Control Program within two weeks once the Vapor Recovery Unit becomes operational again or the Vapor Combustor Unit is no longer located at the facility.

You are still obligated to meet all applicable air pollution control rules, Department of Natural Resources' rules, or any other applicable federal, state, or local agency regulations. Specifically, you should avoid violating 10 CSR 10-6.045 *Open Burning Requirements*, 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*, and 10 CSR 10-6.165 *Restriction of Emission of Odors*.

A copy of this letter should be kept with the unit and be made available to Department of Natural Resources' personnel upon verbal request. If you have any questions regarding this determination, please do not hesitate to contact Ryan Schott at the departments' 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



Kyra L. Moore  
Director

KLM:rs1

c: PAMS File: 2015-12-043  
Southeast Regional Office