

STATE OF MISSOURI

PERMIT BOOK



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: 032015-021

Project Number: 2014-12-027
Installation Number: 510-0016

Parent Company: J. D. Streett & Company, Inc.

Parent Company Address: 144 Weldon Parkway, Maryland Heights, MO 63043

Installation Name: J. D. Streett & Company, Inc.

Installation Address: 3800 South 1st Street, St. Louis, MO 63118

Location Information: City of St. Louis

Application for Authority to Construct was made for:
The modification of an existing bay in the south loading rack to accommodate gasoline.
This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060 *Construction Permits Required*.

Standard Conditions (on reverse) are applicable to this permit.

Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

MAR 31 2015

EFFECTIVE DATE

Wesley A. Moore

DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. The permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Department's Air Pollution Control Program of the anticipated date of start up of these air contaminant sources. The information must be made available within 30 days of actual startup. Also, you must notify the Department of Natural Resources' St. Louis Regional Office within 15 days after the actual start up of these air contaminant sources.

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 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 choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant sources(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

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SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060(12)(A)10. "Conditions required by permitting authority."

J. D. Streett & Company, Inc.
City of St. Louis

1. **Superseding Condition**
The conditions of this permit supersede Special Conditions 2 and 3 found in Construction Permit 062013-005 previously issued by the Air Pollution Control Program.
2. **Control Device Requirement – Activated Carbon Adsorption Systems**
 - A. J. D. Streett & Company, Inc. shall control VOC emissions from the gasoline bays of EP-01 Truck Loading Rack #1 and EP-02 Truck Loading Rack #2 using an activated carbon adsorption system.
 - B. The activated carbon adsorption system shall be operated and maintained in accordance with the manufacturer's specifications and the following requirements:
 - 1) The 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 visibly observed.
 - 2) J. D. Streett & Company, Inc. shall conduct annual testing of the carbon activity for the carbon in the 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 D5228-92 or other method upon Air Pollution Control Program approval.
 - 3) J. D. Streett & Company, Inc. shall conduct monthly measurements of the carbon bed outlet VOC concentration over the last five minutes of an adsorption cycle for the carbon bed, documenting the highest measured VOC concentration. Measurements shall be made using a portable analyzer, or a permanently mounted analyzer, in accordance with EPA Method 21 for open-ended lines.
 - 4) J. D. Streett & Company, Inc. shall verify at least once each operating day that the valves are properly sequenced, the cycle time, the gasoline flow, the purge air flow, and the operating

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SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

- temperature. Verification shall be through visual observation, or through an automated alarm and shutdown system that monitors system operation.
- 5) J.D. Streett & Company, Inc. shall perform semi-annual preventative maintenance inspections of the carbon adsorption system, including the automated alarm and shutdown system if so equipped.
 - 6) J. D. Streett & Company, Inc. shall document the maximum vacuum level observed each day and the maximum VOC concentration observed each month. The maximum vacuum level and VOC concentration shall be maintained within ± 10 percent of the average values observed during the most recent carbon activity test.
- C. J. D. Streett & Company, Inc. shall maintain a copy of the activated carbon adsorption system manufacturer's operations manual on site.
- D. J. D. Streett & Company, Inc. shall maintain an operating and maintenance log for the activated carbon adsorption system which shall include the following:
- 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
3. Gasoline Limitations
- A. J. D. Streett & Company, Inc. shall not handle gasoline with an RVP greater than 13 during the calendar months of October, November, December, January, February, March, and April.
 - B. J. D. Streett & Company, Inc. shall not handle gasoline with an RVP greater than 9 during the calendar months of May, June, July, August, and September.
 - C. J. D. Streett & Company, Inc. shall test their gasoline at least once each calendar month to determine the vapor pressure.
 - 1) J. D. Streett & Company, Inc. shall use ASTM D6378-10 or ASTM D5191-10b to determine the vapor pressure of their gasoline. Other test methods may be used upon receipt of written approval by the Air Pollution Control Program.

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SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

- D. J. D. Streett & Company, Inc. shall emit less than 2.18 milligrams of VOC per liter of gasoline loaded. J. D. Streett & Company, Inc. shall conduct performance testing according to Special Condition 3.E to demonstrate compliance with this requirement.

 - E. J. D. Streett & Company, Inc. shall test the VOC emission rate from the activated carbon adsorption system at least once every five years using EPA Test Methods 25A or 25B or other methods upon Air Pollution Control Program approval.
 - 1) The most recent test occurred June 11, 2014; therefore, the next test is required to occur by no later than June 11, 2019.
 - 2) A completed Proposed Test Plan Form (enclosed) shall be submitted to the Air Pollution Control Program 30 days prior to the proposed test date so that the Air Pollution Control Program may arrange a pretest meeting, if necessary, and assure that the test date is acceptable for an observer to be present. The Proposed Test Plan may serve the purpose of notification and must be approved by the Director prior to conducting the required emission testing.
 - 3) Two copies of a written report of the performance test results shall be submitted to the Director within 30 days of completion of any required testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required U.S. EPA Method for at least one sample run.
 - 4) The test report is to fully account for all operational and emission parameters addressed both in the permit conditions as well as in any other applicable state or federal rules or regulations.

 - F. If J. D. Streett & Company, Inc. fails to comply with the VOC limit, the installation will no longer qualify for a Basic Operating Permit. J. D. Streett & Company, Inc. shall apply for an Intermediate or Part 70 operating permit no later than 90 days after the date of the failed test.
4. Recordkeeping and Reporting Requirements
J. D. Streett & Company, Inc. shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW

Project Number: 2014-12-027
Installation ID Number: 510-0016
Permit Number:

J. D. Strett & Company, Inc.
3800 South 1st Street
St. Louis, MO 63118

Complete: December 15, 2014

Parent Company:
J. D. Strett & Company, Inc.
144 Weldon Parkway
Maryland Heights, MO 63043

City of St. Louis

REVIEW SUMMARY

- J. D. Strett & Company, Inc. has applied for authority to modify an existing bay in the south loading rack to accommodate gasoline.
- HAP emissions are expected from the proposed modification to the south loading rack. SDS for the installation's gasoline indicate hexane (110-54-3), benzene (71-43-2), toluene (108-88-3), xylene (1330-20-7), ethylbenzene (100-41-4), cumene (98-82-8), and naphthalene (91-20-3).
- 40 CFR Part 60, Subpart XX – *Standards of Performance for Bulk Gasoline Terminals* applies to the installation. This project is for the modification of the existing south loading rack. NSPS XX states at §60.500(b) that this regulation applies to the total of all loading racks at a bulk gasoline terminal which deliver liquid product into gasoline truck for which construction or modification has commenced after December 17, 1980.
- 40 CFR Part 63, Subpart R – *National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)* does not apply to the installation as the installation is a minor source of HAPs.
- 40 CFR Part 63, Subpart BBBBBB – *National Emission Standards for HAP for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities* applies to the installation.
- The permittee operates an activated carbon adsorption system on their gasoline loading bays to meet 10 CSR 10-5.220(3)(B)2.A which limits their VOC emissions from these bays to less than or equal to 10 milligrams per liter of gasoline loaded. The activated carbon adsorption system was tested in June of 2014 and achieved 0.92 mg of VOC emissions per liter of gasoline loaded. During the testing event, the

maximum vacuum level was 17.0 inches H₂O and the VOC concentration was 400 ppmv.

- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060 *Construction Permits Required*. Potential emissions of VOC exceed the de minimis level.
- This installation is located in the City of St. Louis, a nonattainment area for the 2008 ozone NAAQS and 1997 PM_{2.5} NAAQS.
- This installation is on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2, Item #22. The installation's major source level is 100 tons per year and fugitive emissions are counted toward major source applicability. Prior to this permit the installation was a minor NSR source. If the installation fails to comply with the VOC emission limits in Special Condition 3, the installation will no longer be a minor NSR source.
- Ambient air quality modeling was not performed as no model is currently available which can accurately predict ambient ozone concentrations caused by this installation's VOC emissions and potential individual HAP emissions of the application are below the SMALs.
- Emissions testing is required for the equipment.
- At the time of permit issuance, the installation qualifies for a Basic state operating permit. If the VOC emission rate of Special Condition 3.D is ever exceeded, the installation will be required to obtain an Intermediate or Part 70 operating permit.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

J.D. Streett & Company, Inc. is a gasoline (E10), diesel, and fuel additive distributor. Product is received by pipeline and trucked out. Table 1 contains an emission unit list for the entire installation.

Table 1: Plantwide Emission Unit List¹

Emission Unit	Description	Construction Date	Project Status
EP-01	Truck Loading Rack #1	2015	Modified
EP-02	Truck Loading Rack #2	1973	Existing
EP-03	2,368,000 gallon Gasoline IFRT #3	1970	Debottlenecked
EP-04	2,310,000 gallon Diesel IFRT #4	1973	Existing
EP-05	3,360,000 gallon Gasoline IFRT #1	1970	Debottlenecked
EP-06	3,360,000 gallon Diesel VFRT #7	Prior to June 1973	Existing

¹ The installation has not operated their barge loading operation (EP-16), vertical fixed roof tank #12 (EP-15), and vertical fixed roof tank #14 (EP-17) in over five years; therefore, the installation will need to obtain a construction permit if they plan to operate these emission sources again.

EP-07	2,310,000 gallon Gasoline IFRT #2	1970	Debottlenecked
EP-08	3,360,000 gallon Gasoline IFRT #6	Prior to June 1973	Debottlenecked
EP-09	3,360,000 gallon Gasoline IFRT #5	1970	Debottlenecked
EP-10	30,000 gallon Denatured Ethanol VFRT #8	1980	Debottlenecked
EP-11	30,000 gallon Denatured Ethanol VFRT #9	1980	Debottlenecked
EP-12	5,000 gallon Fuel Additive HFRT #10	1970	Existing
EP-13	10,000 gallon Fuel Additive VFRT #11	1994	Existing
EP-14	10,000 gallon Fuel Additive VFRT #13	1994	Existing
EP-18	8,500 gallon Fuel Additive VFRT #15	1973	Existing
EP-19	25,000 gallon Biodiesel/Soy Oil VFRT #16	2009	Existing
EP-20	30,000 gallon Denatured Ethanol VFRT #17	2011	Debottlenecked
EP-21	30,000 gallon Denatured Ethanol VFRT #18	2011	Debottlenecked

The following New Source Review permits have been issued to J. D. Streett & Company, Inc. by the City of St. Louis Division of Air Pollution Control:

Table 2: Permit History

Permit Number	Description
97-04-028	Allowed for the installation of ethanol storage tanks
03-01-003	Replaced and modified the throughput limitations of 97-04-028
042013-004	Temporary permit for a vapor combustion unit
062013-005	Increase throughput

PROJECT DESCRIPTION

The installation has requested to modify the input manifold piping system on Truck Loading Rack #1 so that both bays can accommodate E10 (gasoline blended with 10% ethanol). Blending occurs by sequentially loading first ethanol and then gasoline into the trucks. The installation currently processes gasoline with an RVP of 13 or lower. Receipt of gasoline with an RVP higher than 13 would result in higher emissions than were calculated and would require a permit modification. Modification of the truck loading bay increases maximum gasoline throughputs from 69,600 gal/hr to 92,800 gal/hr and maximum denatured ethanol throughputs from 7,740 gal/hr to 10,320 gal/hr. All of the loading racks can still accommodate diesel. Potential emissions from the truck loading racks are based on the loading of E10 as the loading of E10 results in greater emissions than the loading of diesel.

As this project modifies the existing installation, project potential emissions were determined to be the difference between the potential emissions and baseline actual emissions. The baseline period chosen was the calendar years of 2009 and 2010. Baseline actual emissions were determined to be 33.50 tons VOC based on emissions reported in the installation's EIQs.

The vapor pressure limits in Special Condition 3 are based on the limits found in 40 CFR 80.27(a)(2) Control and Prohibitions on Gasoline Volatility.

The VOC limit in Special Condition 3 is the maximum VOC emission rate at which the installation's potential VOC emissions would not exceed 100 tons per year. An

exceedance of this limit would not result in a violation of this permit, but would result in the installation becoming a major source for both NSR and Title V permitting purposes and would require an amendment to this permit or a new permit to account for the higher emission rate.

EMISSIONS/CONTROLS EVALUATION

The collection efficiency for emissions from truck loading was obtained from AP-42 Section 5.2.2.1.1 “Loading Losses” (July 2008) to be 99.2 percent for tanker trucks passing the MACT-level annual leak test. Uncaptured emissions were calculated using AP-42 Section 5.2.2.1.1 Equation 1, an average annual temperature of 60°F, a maximum gasoline RVP of 13 for the months of October through April (to represent a worst-case scenario), a maximum gasoline RVP of 9 for the months of May through September, and a saturation factor of 0.6 for submerged loading and dedicated normal service. Captured and controlled VOC emissions from the loading bays were calculated using the June 2014 stack tested VOC emission rate of 0.92 mg/L. HAP emissions from gasoline loading were calculated by multiplying the VOC emission factor by the maximum HAP contents listed in the SDS provided by the installation for their gasoline. Table 3 contains the maximum HAP contents as listed in the gasoline SDS.

Table 3: Gasoline SDS Maximum HAP Contents (wt%)

Hexane (110-54-3)	Benzene (71-43-2)	Toluene (108-88-3)	Xylene (1330-20-7)	Ethylbenzene (100-41-4)	Cumene (98-82-8)	Naphthalene (91-20-3)	HAP
8	1.3	20	18	4	4	2	57.3

Potential emissions from ethanol and diesel loading were calculated using Equation 1 from AP-42’s Section 5.2.2.1.1 “Loading Losses” (July 2008) and the following variables:

Table 4: Loading Loss Variables²

Material	Saturation Factor, S	True Vapor Pressure, P (psia)	Molecular Weight, M (lb/lb-mole)	Temperature, T (°F)
Ethanol	0.6 Submerged Loading	0.619	46.07	ambient
Diesel		0.0065	130	

VOC working and breathing losses from the tanks at the installation were evaluated used TANKS 4.0.9d. HAP emissions from gasoline storage were calculated by multiplying the VOC emission factor by the maximum HAP contents from the gasoline SDS. Roof landing emissions were based on a maximum of two events per year per gasoline tank. Filling losses for each roof landing event were estimated in TANKS 4.0.9d using a fixed roof tank with a height equal to the height of the roof leg supports and one turnover. Standing idle losses for each roof landing event were calculated using Equation 2-22 of AP-42 Section 7.1 “Organic Liquid Storage Tanks” (November 2006).

² The true vapor pressures were obtained from AP-42 Tables 7.1-2 and 7.1-3 for 60°F as TANKS 4.0.9d lists the average ambient air temperature for St. Louis, MO as 56.0333°F.

Emissions from equipment leaks were based on 214 valves, 25 pump seals, and 33 other components. Emission factors were obtained from EPA's Protocol for Equipment Leak Emissions Estimates (November 1995).

Table 5 provides an emissions summary for this project. Existing potential emissions from the installation were calculated as part of this project as previous projects failed to account for fugitive emissions from roof landings and equipment leaks. Existing actual emissions were taken from the installation's 2013 EIQ. Project potential emissions are based on potential emissions minus baseline actual emissions. The new installation potential emissions represents the bottlenecked potential of the entire installation, assuming continuous operation (8,760 hours per year).

Table 5: Emissions Summary (tons per year)³

Pollutant	Regulatory De Minimis Levels	Existing Potential	Existing Actual Emissions (2013 EIQ)	Project Potential Emissions	New Installation Potential
PM	25.0	N/A	-	N/A	N/A
PM ₁₀	15.0	N/A	-	N/A	N/A
PM _{2.5}	10.0	N/A	-	N/A	N/A
SO _x	40.0	N/A	-	N/A	N/A
NO _x	40.0	N/A	-	N/A	N/A
VOC	40.0	85.45	30.85	62.77	95.77 ⁴
CO	100.0	N/A	-	N/A	N/A
GHG (CO ₂ e)	100,000	N/A	-	N/A	N/A
HAP	25.0	5.42	-	6.04	6.04
Hexane (110-54-3)	10.0 ⁵	2.27	-	2.53	2.53
Toluene (108-88-3)	10.0 ⁵	1.58	-	1.75	1.75
Xylene (1330-20-7)	10.0 ⁵	0.88	-	0.98	0.98
Benzene (71-43-2)	10.0 ⁶	0.22	-	0.24	0.24
Ethylbenzene (100-41-4)	10.0 ⁵	0.21	-	0.23	0.23
Cumene (98-82-8)	10.0 ⁵	0.16	-	0.18	0.18
Naphthalene (91-20-3)	10.0 ⁵	0.08	-	0.09	0.09

³ N/A = Not Applicable; N/D = Not Determined.

⁴ Based on the most recent carbon adsorption system stack tested rate of 0.92 mg VOC per liter of gasoline loaded. A stack tested value of 2.18 mg VOC per liter of gasoline loaded or greater would result in potential VOC emissions exceeding 100 tons per year.

⁵ This value represents both the major source level and the SMAL.

⁶ The SMAL for Benzene (71-43-2) is 2.0 tpy.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060 *Construction Permits Required*. Potential emissions of VOC are above de minimis levels, but below major source levels.

APPLICABLE REQUIREMENTS

J. D. Streett & Company, Inc. shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- 10 CSR 10-6.065 *Operating Permits*
 - Based on the most recent carbon adsorption system stack tested rate of 0.92 mg VOC per liter of gasoline loaded. The installation requires a Basic State Operating Permit.
 - Subsequent testing is required by Special Condition 3.E. If the results of subsequent testing indicate a VOC emission rate in excess of 2.18 mg VOC per liter of gasoline loaded, J. D. Streett & Company, Inc. will require an Intermediate or Part 70 Operating Permit. J. D. Streett & Company, Inc. shall submit an application for an Intermediate or Part 70 operating permit no later than 90 days after the failed test date as required by Special Condition 3.F.
- 10 CSR 10-6.110 *Submission of Emission Data, Emission Fees and Process Information*
 - The installation is required to submit a full EIQ for the 2017 calendar year.
- 10 CSR 10-6.165 *Restriction of Emission of Odors*
- 10 CSR 10-6.170 *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*
- 10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants*

SPECIFIC REQUIREMENTS

- 10 CSR 10-5.220 *Control of Petroleum Liquid Storage, Loading, and Transfer*

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

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Alana L. Hess
New Source Review Unit

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated December 10, 2014, received December 15, 2014, designating J. D. Streett & Company, Inc. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- June 2014 Stack Test
- TANKS 4.0.9d

APPENDIX A

Abbreviations and Acronyms

%	percent	m/s	meters per second
°F	degrees Fahrenheit	Mgal	1,000 gallons
acfm	actual cubic feet per minute	MW	megawatt
BACT	Best Available Control Technology	MHDR	maximum hourly design rate
BMPs	Best Management Practices	MMBtu	Million British thermal units
Btu	British thermal unit	MMCF	million cubic feet
CAM	Compliance Assurance Monitoring	MSDS	Material Safety Data Sheet
CAS	Chemical Abstracts Service	NAAQS ...	National Ambient Air Quality Standards
CEMS	Continuous Emission Monitor System	NESHAPs	National Emissions Standards for Hazardous Air Pollutants
CFR	Code of Federal Regulations	NO_x	nitrogen oxides
CO	carbon monoxide	NSPS	New Source Performance Standards
CO₂	carbon dioxide	NSR	New Source Review
CO_{2e}	carbon dioxide equivalent	PM	particulate matter
COMS	Continuous Opacity Monitoring System	PM_{2.5}	particulate matter less than 2.5 microns in aerodynamic diameter
CSR	Code of State Regulations	PM₁₀	particulate matter less than 10 microns in aerodynamic diameter
dscf	dry standard cubic feet	ppm	parts per million
EQ	Emission Inventory Questionnaire	PSD	Prevention of Significant Deterioration
EP	Emission Point	PTE	potential to emit
EPA	Environmental Protection Agency	RACT	Reasonable Available Control Technology
EU	Emission Unit	RAL	Risk Assessment Level
fps	feet per second	SCC	Source Classification Code
ft	feet	scfm	standard cubic feet per minute
GACT	Generally Available Control Technology	SDS	Safety Data Sheet
GHG	Greenhouse Gas	SIC	Standard Industrial Classification
gpm	gallons per minute	SIP	State Implementation Plan
gr	grains	SMAL	Screening Model Action Levels
GWP	Global Warming Potential	SO_x	sulfur oxides
HAP	Hazardous Air Pollutant	SO₂	sulfur dioxide
hr	hour	tph	tons per hour
hp	horsepower	tpy	tons per year
lb	pound	VMT	vehicle miles traveled
lbs/hr	pounds per hour	VOC	Volatile Organic Compound
MACT	Maximum Achievable Control Technology		
µg/m³	micrograms per cubic meter		

Mr. Mike Bramell
Terminal Manager
J. D. Streett & Company, Inc.
3800 South 1st Street
St. Louis, MO 63118

RE: New Source Review Permit - Project Number: 2014-12-027

Dear Mr. Bramell:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application, and your Basic operating permit application are necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to §§621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within 30 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 administrative hearing commission, whose contact information is: Administrative Hearing Commission, Truman State Office Building, Room 640, 301 W. High Street, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.ao.mo.gov/ahc.

If you have any questions regarding this permit, please do not hesitate to contact Alana Hess, at the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp
New Source Review Unit Chief

SH:ah

Enclosures

c: PAMS File: 2014-12-027