



MISSOURI
 DEPARTMENT OF
 NATURAL RESOURCES
 Air Pollution Control Program

INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2017-054
Expiration Date: JUL 05 2022
Installation ID: J4189-0516
Project Number: 2010-05-031

Installation Name and Address

J.D. Streett & Co., Inc. Lemay Terminal
 #1 River Road
 Lemay, MO 63125
 St. Louis County

Parent Company's Name and Address

J.D. Streett & Co., Inc.
 144 Weldon Parkway
 Maryland Heights, MO 63043

Installation Description:

J.D. Streett & Company Inc. Lemay Terminal stores and handles biofuels, which includes, but not limited to ethanol, corn oil, and biodiesel as well as kerosene, diesel fuel and sodium hydroxide (Caustic Soda). Product is received via truck, railcar and barge. Products are shipped out via truck and barge. J.D. Streett & Company Inc. Lemay Terminal is a synthetic minor source for VOC and minor source for HAPs.

BJ
 Prepared by:
 Bern Johnson
 Operating Permit Unit

Kyra L Moore
 Director or Designee
 Department of Natural Resources

JUL 05 2017

Effective Date

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I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS

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

2016 EIQ Emission Point #	Description
EP-01	1.344 million gal internal floating roof tank prior to 1973
EP-02	1.344 million gal internal floating roof tank prior to 1973
EP-03	1.344 million gal internal floating roof tank prior to 1973
EP-04	1.344 million gal internal floating roof tank prior to 1973
EP-05	1.344 million gal internal floating roof tank prior to 1973
EP-06	1.344 million gal internal floating roof tank prior to 1973
EP-10	0.525 million gal internal floating roof tank prior to 1973

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

2016 EIQ Emission Point #	Description
EP-07	1.050 million gal vertical fixed roof prior to 1973 – biodiesel, soya oil, kerosene
EP-08	0.630 million gal vertical fixed roof tank prior to 1973 – sodium hydroxide
EP-09	0.420 million gal vertical fixed roof tank prior to 1973 - diesel
EP-11	Truck loading racks prior to 1973
EP-12	Barge loading prior to 1973

II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW1

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

Emission Limitation:

The permittee shall emit less than 100 tons of Volatile Organic Compounds (VOCs) from the entire installation in any consecutive 12-month period.

Monitoring/Record Keeping:

- 1) The permittee shall calculate and record monthly and 12-month rolling total emissions of VOCs. The permittee has created a custom spreadsheet, "20xx VOC JDS-Rolling.xls", to demonstrate compliance with the emission limitation. Air Program staff have reviewed all equations and emission factors in this spreadsheet and determined it is acceptable for this requirement (see Attachment A for examples).
- 2) The permittee shall maintain all records required by this permit for a minimum of five years and shall make them available to any Department of Natural Resources' personnel upon request. These records shall include Safety Data Sheets for all materials used.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which the permittee determines that the installation exceeded the emission limitation listed above.
- 2) Reports of any deviations from monitoring, other than the recordkeeping and reporting requirements of this permit condition, shall be submitted in the annual compliance certification, as required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 1	
10 CSR 10-5.500 Control of Emissions from Volatile Organic Liquid Storage	
Emission Unit	Description
EP-01	1.344 million gal internal floating roof tank prior to 1973
EP-02	1.344 million gal internal floating roof tank prior to 1973
EP-03	1.344 million gal internal floating roof tank prior to 1973
EP-04	1.344 million gal internal floating roof tank prior to 1973
EP-05	1.344 million gal internal floating roof tank prior to 1973
EP-06	1.344 million gal internal floating roof tank prior to 1973
EP-10	0.525 million gal internal floating roof tank prior to 1973

Monitoring/Recordkeeping:

- 1) The permittee of each storage vessel with a design capacity greater than or equal to 40,000 gallons storing a liquid with a maximum true vapor pressure that is normally less than 0.75 psia shall notify the department within thirty days when the maximum true vapor pressure of the liquid exceeds 0.75 psia.
- 2) Available data on the storage temperature may be used to determine the maximum true vapor pressure.
 - a) For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.
- 3) The permittee shall maintain a record of the VOL storage, the period of storage, and the maximum true vapor pressure of the VOL during the respective storage period.

Reporting:

Reports of any deviations from monitoring, other than the recordkeeping and reporting requirements of this permit condition, shall be submitted in the annual compliance certification, as required by Section V of this permit.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

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

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent

and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos

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

10 CSR 10-6.100 Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

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

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 3) The permittee shall submit a full EIQ for the 2017 and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.

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

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

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.165 Restriction of Emission of Odors

This is a State Only permit requirement.

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

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

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

10 CSR 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited

No owner or operator shall operate applicable hand-fired fuel burning equipment unless the owner or operator meets the conditions set forth in 10 CSR 10-5.040. This regulation shall apply to all hand-fired fuel-burning equipment at commercial facilities including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing or to other equipment exempted under 10 CSR 10-5.040. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations (Rescinded on February 11, 1979, Contained in State Implementation Plan)

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

10 CSR 10-5.120 Information on Sales of Fuels to be Provided and Maintained

Every delivery of coal or residual fuel oil when first delivered to a consumer or wholesaler in the St. Louis metropolitan area must be accompanied by a ticket prepared in triplicate and containing at least the name and address of the seller and the buyer; the grade of fuel; ash content of coal, the source of the fuel, which must be an approved source, and such other information as the Air Conservation Commission may require. One copy of each ticket shall be kept by the person delivering the fuel and be retained for one year; one copy is to be given to the recipient of the fuel to be retained for one year; and,

upon request, within 30 days after delivery of the fuel, the delivering party shall mail one copy to the Air Conservation Commission.

10 CSR 10-5.130 Certain Coals to be Washed

The permittee shall not import, sell, offer for sale, expose for sale, exchange, deliver or transport for use and consumption in the St. Louis metropolitan area or use or consume in the said area any coal which as mined containing in excess of 2.0% sulfur or 12.0% ash calculated as described in 10 CSR 10-5.110, unless it has been cleaned by a process known as "washing" so that it shall contain no more than 12.0% ash on a dry basis. The term "washing" is meant to include purifying, cleaning, or removing impurities from coal by mechanical process, regardless of cleaning medium used.

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

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
 - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used

in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

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

V. General Permit Requirements

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

10 CSR 10-6.065, §(5)(E)2 and §(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, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
 - iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, 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 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

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

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

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

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

None

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized

agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):

- a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
- a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
- a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions
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- 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(5)(C)5 Off-Permit Changes

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

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

The application utilized in the preparation of this permit was signed by the Responsible Official designated for the installation at the time of submittal. Michael Bramell, Terminal Manager, is the current Responsible Official for the installation. 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 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:

- a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;
or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis

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

VI. Attachments

Attachments follow.

ATTACHMENT A
VOC Compliance Worksheet

J. D. STREETT LEMAY FACILITY
Plant Wide VOC Emissions

EMISSIONS ARE IN TONS. PERMIT LIMIT IS LESS THAN 100 TONS PER YEAR

MO-YR	TANK	FUGITIVE	LOADING	TOTAL	12-MONTH ROLLING TOTAL
Jan-14	0.083	0.0125	0.70	0.791	0.791
Feb-14	0.090	0.0125	1.25	1.357	2.148
Mar-14	0.106	0.0125	0.78	0.901	3.049
Apr-14	0.128	0.0125	0.69	0.832	3.882
May-14	0.149	0.0125	0.90	1.059	4.940
Jun-14	0.172	0.0125	0.79	0.976	5.917
Jul-14	0.184	0.0125	0.90	1.102	7.018
Aug-14	0.174	0.0125	0.56	0.743	7.762
Sep-14	0.154	0.0125	0.83	0.994	8.755
Oct-14	0.131	0.0125	1.18	1.320	10.075
Nov-14	0.103	0.0125	0.59	0.705	10.780
Dec-14	0.084	0.0125	0.43	0.522	11.302
Jan-15	0.085	0.0125	0.61	0.704	11.215
Feb-15	0.096	0.0125	0.80	0.908	10.786
Mar-15	0.111	0.0125	0.51	0.635	10.499
Apr-15	0.131	0.0125	0.99	1.134	10.801
May-15	0.156	0.0125	1.00	1.169	10.911
Jun-15	0.179	0.0125	0.72	0.908	10.842
Jul-15	0.189	0.0125	0.55	0.751	10.492
Aug-15	0.180	0.0125	0.63	0.822	10.571
Sep-15	0.159	0.0125	0.77	0.938	10.515
Oct-15	0.135	0.0125	1.17	1.314	10.508
Nov-15	0.111	0.0125	0.74	0.861	10.664
Dec-15	0.089	0.0125	0.85	0.949	11.092
Jan-16	0.087	0.0125	0.50	0.597	10.985
Feb-16	0.096	0.0125	1.10	1.209	11.286
Mar-16	0.112	0.0125	0.85	0.970	11.621
Apr-16	0.129	0.0125	0.90	1.041	11.528
May-16	0.154	0.0125	0.81	0.981	11.341
Jun-16	0.176	0.0125	0.45	0.637	11.069
Jul-16	0.186	0.0125	0.55	0.752	11.070
Aug-16	0.178	0.0125	0.58	0.772	11.020
Sep-16	0.159	0.0125	0.49	0.656	10.739
Oct-16	0.130	0.0125	0.65	0.792	10.217
Nov-16	0.108	0.0125	0.59	0.706	10.062
Dec-16	0.089	0.0125	0.77	0.875	9.989
Jan-17	0.084	0.0125	0.52	0.615	10.007
Feb-17	0.097	0.0125	0.54	0.650	9.448
Mar-17	0.108	0.0125	0.79	0.912	9.390

LOADING RACK EMISSIONS

	LOADING EMISSIONS					AMOUNT LOADED		
	TONS TOTAL TONS	POUNDS				GALLONS		
		TOTAL EMIS- SIONS	ETOH TRUCK EMIS.	ETOH BARGE EMIS.	K1 TRUCK EMIS	ETHANOL LOADED TO TRUCKS	ETHANOL LOADED TO BARGES	K1 LOADED TO TRUCKS
Jan-14	0.70	1392.0	46	1,346	0.00	113,199	3,934,449	0
Feb-14	1.25	2509.1	555	1,954	0.00	1,354,281	5,713,059	0
Mar-14	0.78	1584.4	192	1,373	0.00	487,494	4,013,711	0
Apr-14	0.69	1383.1	102	1,281	0.00	248,900	3,745,836	0
May-14	0.90	1795.5	165	1,631	0.00	401,688	4,768,412	0
Jun-14	0.79	1584.7	300	1,285	0.00	731,338	3,756,730	0
Jul-14	0.90	1809.8	98	1,712	0.00	239,138	5,005,139	0
Aug-14	0.56	1112.9	97	1,018	0.00	235,629	2,971,478	0
Sep-14	0.83	1653.3	21	1,632	0.00	51,060	4,773,070	0
Oct-14	1.18	2352.9	269	2,084	0.00	655,216	6,094,231	0
Nov-14	0.59	1179.8	199	981	0.00	484,978	2,868,392	0
Dec-14	0.43	850.5	248	604	0.00	600,485	1,766,818	0
Jan-15	0.61	1212.0	57	1,155	0.00	139,270	3,377,027	0
Feb-15	0.80	1598.4	89	1,529	0.00	168,693	4,471,503	0
Mar-15	0.51	1022.5	112	910	0.00	273,308	2,662,129	0
Apr-15	0.99	1981.2	90	1,891	0.00	220,247	5,528,913	0
May-15	1.00	2000.8	155	1,845	0.00	379,044	5,396,013	0
Jun-15	0.72	1433.0	331	1,102	0.00	806,377	3,223,409	0
Jul-15	0.55	1098.6	90	1,008	0.00	220,175	2,948,357	0
Aug-15	0.63	1258.5	101	1,157	0.00	247,149	3,383,529	0
Sep-15	0.77	1531.6	96	1,438	0.00	233,188	4,198,745	0
Oct-15	1.17	2333.4	55	2,279	0.00	133,233	6,663,079	0
Nov-15	0.74	1474.6	67	1,408	0.00	162,950	4,118,242	0
Dec-15	0.85	1694.6	283	1,411	0.00	690,722	4,128,864	0
Jan-16	0.50	994.9	45	949	0.00	110,877	2,776,020	0
Feb-16	1.10	2201.5	62	2,140	0.00	150,368	6,257,002	0
Mar-16	0.85	1691.1	192	1,499	0.00	469,417	4,381,948	0
Apr-16	0.90	1798.7	407	1,391	0.00	993,820	4,067,989	0
May-16	0.81	1629.7	94	1,536	0.00	229,249	4,490,407	0
Jun-16	0.45	896.3	178	720	0.00	430,420	2,104,793	0
Jul-16	0.55	1105.8	274	831	0.00	669,331	2,430,940	0
Aug-16	0.58	1162.5	147	1,015	0.00	359,354	2,968,320	0
Sep-16	0.49	970.3	296	675	0.00	721,459	1,972,296	0
Oct-16	0.65	1299.3	351	949	0.00	854,940	2,774,284	0
Nov-16	0.59	1170.4	144	1,026	0.00	351,800	3,000,561	0
Dec-16	0.77	1547.5	119	1,429	0.00	289,563	4,177,719	0
Jan-17	0.52	1036.2	165	871	0.00	403,632	2,545,809	0
Feb-17	0.54	1081.6	58	1,024	0.00	141,348	2,993,110	0
Mar-17	0.79	1583.7	642	942	0.00	1,565,225	2,754,352	0

ENTER DATA IN THESE COLUMNS

MONTHLY TANK EMISSION DATA

THIS DATA WAS OBTAINED BY RUNNING THE EPA TANKS PROGRAM VERSION 4.0.9d.
 The total tons values should be copied to the "Monthly totals" sheet.

TANK EMISSIONS IN POUNDS												
	TOTAL TONS	TOTAL LBS	Tank 1	Tank 2	Tank 3	Tank 4	Tank 5	Tank 6	Tank 7	Tank 8	Tank 9	Tank 10
Jan-15	0.08531	170.62	27.15	33.44	30.05	14	24.18	25.7	N/A	N/A	N/A	16.1
Feb-15	0.09595	191.9	33.1	42.44	31.87	15	26.03	25.9	N/A	N/A	N/A	17.56
Mar-15	0.110845	221.69	36.24	47.09	35.9	18.21	31.46	31.46	N/A	N/A	N/A	21.33
Apr-15	0.13101	262.02	42.83	48.35	44.02	23.47	38.51	38.81	N/A	N/A	N/A	26.03
May-15	0.15574	311.48	48.81	56.59	53.01	26.61	46.6	49.39	N/A	N/A	N/A	30.47
Jun-15	0.17916	358.32	57.53	65.81	57.18	32.05	56.25	54.06	N/A	N/A	N/A	35.44
Jul-15	0.189415	378.83	56.18	70.26	58.86	33.95	58.83	62.92	N/A	N/A	N/A	37.83
Aug-15	0.18027	360.54	53.4	67.23	57.58	32.4	57.87	55.86	N/A	N/A	N/A	36.2
Sep-15	0.15922	318.44	48.57	64.54	49.27	28.44	47.4	48.36	N/A	N/A	N/A	31.86
Oct-15	0.134625	269.25	41.3	54.44	44.14	22.26	41.08	39.9	N/A	N/A	N/A	26.13
Nov-15	0.11089	221.78	38.94	43.86	36.93	18.15	31.46	31.25	N/A	N/A	N/A	21.19
Dec-15	0.08948	178.96	28.62	35.05	25.67	15.55	28.83	27.98	N/A	N/A	N/A	17.26
Jan-16	0.086975	173.95	30.68	34.1	27.63	13.6	25.29	26.55	N/A	N/A	N/A	16.1
Feb-16	0.095555	191.11	34.27	37.75	30.32	15.62	28.11	27.48	N/A	N/A	N/A	17.56
Mar-16	0.112095	224.19	38.09	46.83	35.61	18.48	32.39	31.46	N/A	N/A	N/A	21.33
Apr-16	0.12938	258.76	42.45	51.31	39.1	22.35	38.58	38.94	N/A	N/A	N/A	26.03
May-16	0.153605	307.21	51.53	63.69	44.95	26.34	45.28	44.95	N/A	N/A	N/A	30.47
Jun-16	0.17617	352.34	56.2	72.33	52.98	30.48	52.64	52.27	N/A	N/A	N/A	35.44
Jul-16	0.18649	372.98	60.88	72.03	57.71	32.64	56.09	55.8	N/A	N/A	N/A	37.83
Aug-16	0.178005	356.01	56.27	70.09	55.67	30.98	53.4	53.4	N/A	N/A	N/A	36.2
Sep-16	0.158645	317.29	51.12	61.79	51.02	27.47	47.03	47	N/A	N/A	N/A	31.86
Oct-16	0.13007	260.14	43.04	51.5	39.89	22.38	38.65	38.55	N/A	N/A	N/A	26.13
Nov-16	0.10835	216.7	38.05	45.04	31.25	18.34	31.58	31.25	N/A	N/A	N/A	21.19
Dec-16	0.08914	178.28	29.05	35.18	29.83	15.24	26.26	25.46	N/A	N/A	N/A	17.26
Jan-17	0.084385	168.77	29.94	35.85	25.55	13.68	23.8	23.85	N/A	N/A	N/A	16.1
Feb-17	0.096575	193.15	31.53	35.92	31.16	17.81	29.35	29.82	N/A	N/A	N/A	17.56
Mar-17	0.10766	215.32	33.78	41.51	32.93	20.66	32.34	32.77	N/A	N/A	N/A	21.33

STATEMENT OF BASIS

Voluntary Limitations

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

INSTALLATION DESCRIPTION

J.D. Streett & Company, Inc. Lemay Terminal is an ethanol (E-10), diesel, and fuel additive distributor. The installation receives stock mostly through railcars, with a small amount by truck. Product is shipped out by barge and tanker truck. Physical restrictions at the installation allow a maximum of 20 railcars onsite at any one time. The maximum capacity for pumping from railcars to tanks is 54,000 gallons per hour. Including downtime for changing hoses, 15 hours are required for a complete unload cycle. J.D. Streett is a synthetic minor source for VOC and a minor source for HAPs. The installation is not a named source and fugitive emissions do not count towards potential-to-emit calculations.

In 2009, the facility installed internal floating roofs on existing vertical fixed roof tanks 1, 2, 3, 5, and 6. Vertical fixed roof tanks at the facility were constructed prior to 1973. Installation of internal floating roofs on these tanks does not constitute a "modification" as defined in 40 CFR 60.14 since it reduced the emissions rather than increasing them. Installation of Internal floating roofs did not constitute "reconstruction" as defined in 40 CFR 60.15(b) since the fixed cost of the new components do not exceed 50% of fixed capital cost that would be required to construct a new internal floating roof tank.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹
Total HAP	5.92
Benzene	3.30
Toluene	2.62
VOC	137.65

¹Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

Reported Air Pollutant Emissions, tons per year

Pollutants	2016	2015	2014	2013	2012
VOC	11.41	11.41	11.41	8.43	8.43
HAPs ¹	0.49	0.49	0.49	0.36	0.36

¹ HAP emissions were not reported to MOEIS. These values are based on HAP fraction of VOC from PTE calculation.

Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, received May 13, 2010;
- 2) St. Louis County Operating and Construction permits 6813, 6814, 6815, 6817, and 6818;
- 3) 2016 Emissions Inventory Questionnaire, received March 27, 2017;
- 4) WebFIRE; and
- 5) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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

None

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

10 CSR 10-5.220: Control of Petroleum Liquid Storage, Loading, and Transfer: Currently, products handled at the Lemay plant are ethanol, biodiesel, soya oil, K-1 kerosene, and sodium hydroxide. Based on the definition of Petroleum Liquid in 10 CSR 10-6.020(2)(P)(8), only K-1 kerosene would be considered a petroleum liquid since it is a fuel oil #1. The only provision of this rule that potentially could apply is to the petroleum liquid storage tanks, since all other provisions are applicable to gasoline loading into delivery vessels, transfer of gasoline from delivery vessels to storage containers, gasoline delivery vessels, and fueling of motor vehicles from the storage containers. The Lemay plant currently does not have any of these gasoline operations. In addition, the true vapor pressure of K-1 kerosene is approximately 0.021 psi at 100 degrees Fahrenheit. This value is obtained from Table 7.1-2 of AP-42 for Jet kerosene. As outlined in 10 CSR 10-5.220(3)(A), this regulation is not applicable to storage of K-1 kerosene since the true vapor pressure of kerosene is less than 1.5 psi at 90 degrees F (accounting for increased vapor pressure at higher temperatures). Hence, none of the provisions of 10 CSR 10-5.220 apply to the Lemay plant.

10 CSR 10-5.500 Control of Emissions from Volatile Organic Liquid Storage: This regulation applies to storage tanks storing volatile organic liquid with a maximum true vapor pressure of 0.5 pounds per square inch (psia) or greater in a tank with a capacity of 40,000 gallons. Based on Tank 4.0 software program used for annual EIQ emissions calculations, the maximum vapor pressure of ethanol is 0.72 psia. Because this maximum vapor pressure is <0.75 psi, the control requirements of this regulation do not apply. However, the recordkeeping requirements specified in 10 CSR 10-5.500(3)(G) apply (see Permit Condition 1).

Construction Permit History

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

St. Louis County Operating and Construction permits 6813, 6814, 6815, 6817, and 6818 – these permits were issued for the construction of the various tanks at the installation. They contain a collective 100 tpy VOC limit plus recordkeeping and reporting requirements. These conditions are contained in PW1.

New Source Performance Standards (NSPS) Applicability

40 CFR 60 Subpart K: This subpart applies to tanks >40,000 gallons storing petroleum liquids that were constructed, modified, or reconstructed after 6/11/73 and prior to 5/19/78. Tanks greater than 40,000 gallons at the facility were constructed prior to 1973 and no "modification" or "reconstruction" as defined in the regulations has occurred since then. In addition, ethanol is not a petroleum liquid as defined in 40 CFR 60.111(b). Hence, Subpart K does not apply.

40 CFR 60 Subpart Ka: This subpart applies for tanks >40,000 gallons storing petroleum liquids that were constructed, reconstructed, or modified after May 18, 1978 and prior to July 23, 1984. Since tanks >40,000 gallons at the facility were constructed prior to 1978 and no "modification" or "reconstruction" as defined in regulations has occurred, Subpart Ka does not apply.

40 CFR 60 Subpart Kb: This subpart applies for tanks \geq 19,813 gallons storing volatile organic liquid that were constructed, reconstructed, or modified after July 23, 1984. Since tanks \geq 19,813 gallons at the facility were constructed prior to 1984 and no "modification" or "reconstruction" as defined in the regulations has occurred, Subpart Kb does not apply.

40 CFR 60 Subpart XX: This subpart applies to gasoline loading racks used to deliver gasoline in trucks and if the modification or construction occurred to loading racks after December 17, 1980. The Lemay terminal is not a bulk gasoline terminal and it does not load gasoline into trucks. Hence, this subpart does not apply.

40 CFR 60 Subpart IIII: There are no stationary compression ignition internal combustion engines as specified in 40 CFR 60.4200(a)(1) through (a) (3) at the facility. Hence, this subpart does not apply.

40 CFR 60 Subpart JJJJ: There are no stationary spark ignition internal combustion engines as specified in 40 CFR 60.4230(a)(1) through (a)(5) at the facility. Hence, this subpart does not apply.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR 63 Subpart R: This subpart applies to bulk gasoline terminals and pipeline breakout stations. The Lemay terminal is not a bulk gasoline terminal nor a pipeline breakout station. Hence, this subpart does not apply.

40 CFR 63 Subpart EEEE: This subpart applies to organic liquid (non-gasoline) distribution operations located at a major source of HAP emissions. The Lemay plant has organic liquid distribution operations, but it is not a major HAP source. Hence, this subpart does not apply.

40 CFR 63 Subpart ZZZZ: This subpart applies to reciprocating internal combustion engines at major and area sources of HAPs. The Lemay terminal does not have such combustion engines.

Hence, this subpart does not apply.

40 CFR 63 Subpart BBBB: This subpart applies to each area source bulk gasoline terminal, pipeline breakout station, pipeline pumping station, and bulk gasoline plant. The Lemay terminal is not a bulk gasoline terminal /plant, gasoline pipeline breakout station, or a gasoline pipeline pumping station. Hence, this subpart does not apply.

40 CFR 63 Subpart CCCCC: This subpart applies to area source gasoline dispensing facility. The Lemay plant is not a gasoline dispensing facility. Hence, this subpart does not apply.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None

Other Regulatory Determinations

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin – there are no PM sources at this facility, fugitive or stack. Therefore, this regulation is not applied in this permit.

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants – there are no visible emissions at this facility, fugitive or stack. Therefore, this regulation is not applied in this permit.

10 CSR 10-6.410 Emissions Banking and Trading: This rule currently does not apply to the Lemay plant as specified in 10 CSR 10-6.410 (1)(c).

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

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

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

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

Response to Public Comments

A draft of the Intermediate Operating Permit for J.D. Streett & Co. Lemay Terminal was placed on public notice on May 19, 2017, by the Missouri Department of Natural Resources (MDNR). Comments were received from Mr. Robert Cheever of Region VII of the Environmental Protection Agency. The relevant comments are addressed in the order in which they appear within the letter..

Comment #: 1

Permit Condition PW 1 establishes a volatile organic compound (VOC) emission limit of less than 100 tons from the entire installation in any consecutive 12-month period. Permit Condition PW 1 also requires the use of a custom spreadsheet "20xx VOC JDS-Rolling.xls" to calculate and record monthly and 12-month rolling total emissions of VOC to demonstrate compliance. MDNR indicates "the Air Program staff have reviewed this spreadsheet and determined it is acceptable for this requirement." However, it is MDNR's customary practice to include examples of compliance verification forms, as attachments to draft operating permits on public notice, for public review and comment. Additionally, the monitoring / record keeping requirement in Permit Condition PW 1 does not indicate how compliance is determined. Based on EPA's response in the order granting in part a petition for objection to the operating permit for Yuhuang Chemical, Inc.-Methanol Plant in St. James Parish, Louisiana, Permit Condition PW 1 may not be enforceable. The concept of federal enforceability has been interpreted to encompass a requirement for practical enforceability and in order for emission limits to be enforceable as a practical matter, the permit must clearly specify how emissions are measured and/ or determined for purposes of demonstrating compliance with the limits. Therefore, in order to ensure that the VOC limits are enforceable as a practical matter, MDNR is encouraged to ensure the final permit clearly states or demonstrates how J.D. Streett-Lemay Terminal calculates the actual VOC emissions to demonstrate compliance. To the extent that the calculations or determinations rely on emission factor(s), the final permit should specify the source of the emission factor(s).

Response to Comment:

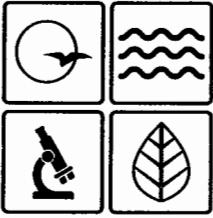
The custom spreadsheet is large and complex, but contains all the necessary information for accurately tracking and reporting emissions. Emission factors are from AP-42 and site-specific data. A copy is available from the Air Program on request. Additional text was added to Permit Condition PW 1 for clarification.

Comment #: 2

The Responsible Person requirement in Section V: General Permit Requirements indicates the application utilized in preparation of this permit was signed by Michael Bramell. However, the application EPA has on file for this permit, was signed by Paul Barragan, therefore, EPA suggests MDNR provide clarification regarding the responsible official for J.D. Streett-Lemay Terminal.

Response to Comment:

The responsible official for the installation changed during the writing of the draft permit. Michael Bramell is the current responsible official. The text for the Responsible Official rule in the General Comments section was updated to clarify this change of official.



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

JUL 05 2017

Mr. Michael Bramell
J.D. Strett & Co., Inc. Lemay Terminal
#1 River Road
Lemay, MO 63125

Re: Intermediate Operating Permit
Facility ID: 189-1516, Permit Number: OP2017-054

Dear Mr. Bramell:

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

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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS/bjj

Enclosures

c: PAMS File: 2010-05-031



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