MISSOURI 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: 032018-002
Project Number: 2017-11-027
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: St. Louis City (Land Grant 3125)

Application for Authority to Construct was made for:
The installation of a barge loading/unloading operation. This review was conducted in accordance with Section (5), 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.

Prepared by
Ryan Schott
New Source Review Unit

Director or Designee
Department of Natural Resources

MAR 07 2018
Effective Date
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. Permittee should notify the Enforcement and Compliance Section of 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 Enforcement and Compliance Section of the Department's Air Pollution Control Program of the anticipated date of startup of this (these) air contaminant source(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department's regional office responsible for the area within which you are located within 15 days after the actual startup of this (these) air contaminant source(s).

A copy of the permit application and this permit and permit review shall be kept at the installation address and shall be made available to Department's 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 source(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 using the contact information below.

Contact Information:
Missouri Department of Natural Resources
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102-0176
(573) 751-4817

The regional office information can be found at the following website:
http://dnr.mo.gov/regions/
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 paragraph (12)(A)10. "Conditions required by permitting authority."

J. D. Streett & Company, Inc.
St. Louis City (Land Grant 3125)

1. Control Device Requirement – 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 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.
   5) J. D. Streett & Company, Inc. shall verify at least once each operating day that the valves are properly sequenced and that the cycle time, the gasoline flow, the purge air flow, and the operating temperature are all within the appropriate operating range. Verification shall be through visual observation, or through an automated alarm and shutdown system that monitors system operation.
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

6) 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.

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 (tons), duration of event, probable cause, and corrective actions; and
   2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

2. Record Keeping 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 SUMMARY

- J. D. Streett & Company, Inc. has applied for authority to install a barge loading/unloading operation.

- The application was deemed complete on December 11, 2017.

- HAP emissions are expected from the proposed equipment. HAPs of concern from this process include evaporative losses from diesel and gasoline loading.

- 40 CFR 60, Subpart XX – Standards of Performance for Bulk Gasoline Terminals applies to the installation.

- 40 CFR 63, Subpart R – National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) does not apply to the installation, as it is a minor source for HAPs.


- An activated carbon adsorption system is being used to control VOC and volatile HAP emissions from the equipment in this permit.

- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required. Potential emissions of all pollutants are below de minimis levels and screening model action levels.

- This installation is located in St. Louis City, a nonattainment area for the 8-hour ozone standard and the PM$_{2.5}$ standard, and an attainment/unclassified area for all other criteria pollutants.
• This installation is on the List of Named Installations found in 10 CSR 10-6.020(3)(B) Table 2, classified as item number 22: Petroleum storage and transfer facilities with a capacity exceeding three hundred thousand (300,000) barrels. The installation’s major source level is 100 tons per year and fugitive emissions are counted toward major source applicability.

• Monthly testing of the carbon bed outlet VOC concentration is required; however, no specific emission testing is required as part of this permit. Testing may be required as part of other state, federal, or applicable rules.

• Submittal of an update to your Intermediate Operating Permit application, Project 2017-11-028, is required within 90 days of equipment startup; or submittal of a Part 70 Operating Permit application is required within one year of equipment startup.

• Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

J. D. Streett & Company, Inc. operates a gasoline, diesel, and fuel additive distribution facility located along the Mississippi River in St. Louis, Missouri. Product is received by pipeline and shipped out by truck. The facility has the capacity to load and unload barges but has not been permitted to do so for several years. The installation is a minor source for construction permits and currently has an Intermediate Operating Permit being reviewed under Project 2017-11-028. The installation will be considered a major source after the completion of this project, when the potential VOC emissions exceed 100 tons per year. The following New Source Review permits have been issued to J. D. Streett & Company, Inc. from the Air Pollution Control Program:

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Description</th>
</tr>
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<tbody>
<tr>
<td>97-04-028</td>
<td>Installation of ethanol storage tanks</td>
</tr>
<tr>
<td>03-01-003</td>
<td>Replaced and modified throughput limitations</td>
</tr>
<tr>
<td>042013-004</td>
<td>Temporary permit for vapor combustion unit</td>
</tr>
<tr>
<td>062013-005</td>
<td>Throughput increase</td>
</tr>
<tr>
<td>032015-021</td>
<td>Modification of loading rack to allow gasoline loading</td>
</tr>
</tbody>
</table>

PROJECT DESCRIPTION

J. D. Streett & Company, Inc. is proposing to begin barge loading/unloading operations at their facility. No new equipment will be installed, as the necessary piping and storage tanks already exist onsite, and the current loading racks will not be modified. Barges filled with gasoline and diesel will be unloaded directly into the existing storage tanks (EP-3, EP-5, EP-7, EP-8 & EP-9 for gasoline; EP-4 & EP-6 for diesel), and diesel will be loaded from the storage tanks into the barges. The maximum design rate of the new process will be 3,000 barrels per hour (126,000 gallons per hour). All storage tanks containing gasoline will be controlled by an existing activated carbon adsorption system.
EMISSIONS/CONTROLS EVALUATION

The diesel loading emission factors used in this analysis were obtained from the EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 5.2 *Transportation and Marketing of Petroleum Liquids* (July 2008). A saturation factor of 0.5 was used for submerged loading, a maximum RVP of 13, and the annual average temperature of 60°F for the St. Louis region was obtained from TANKS 4.0.9d.

J. D. Streett & Company, Inc. operates an activated carbon adsorption system on their gasoline loading bays to meet the requirements of 10 CSR 10-5.220(3)(B)2.A, which limits VOC emissions from these bays to less than or equal to 10 milligrams per liter of gasoline loaded. The activated carbon adsorption system was stack tested in June of 2014 and achieved 0.92 mg of VOC emissions per liter of gasoline loaded at a capture efficiency of 99.8%. These values were used to calculate the overall emission factor for gasoline loading.

HAP emissions from gasoline and diesel loading were calculated using the maximum HAP concentrations listed in the SDS submitted by the installation in the previous construction permit application.

The following table provides an emissions summary for this project. Existing potential emissions were taken from the installation’s previous construction permit (032015-021). Existing actual emissions were taken from the installation’s 2016 EIQ. Potential emissions of the project represent the potential of the equipment, assuming continuous operation (8,760 hours per year).

Table 2: Emissions Summary (tons per year)

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<thead>
<tr>
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<tbody>
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<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
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<td>N/A</td>
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<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
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<td>N/A</td>
<td>N/A</td>
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<tr>
<td>NO&lt;sub&gt;x&lt;/sub&gt;</td>
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<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
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<tr>
<td>VOC</td>
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<td>95.77</td>
<td>38.37</td>
<td>15.47</td>
<td>111.24</td>
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<td>CO</td>
<td>100.0</td>
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<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
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<tr>
<td>Benzene</td>
<td>10.0 / 2</td>
<td>0.24</td>
<td>N/D</td>
<td>0.06</td>
<td>0.30</td>
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<tr>
<td>Cumene</td>
<td>10.0 / 10</td>
<td>0.18</td>
<td>N/D</td>
<td>0.23</td>
<td>0.41</td>
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<tr>
<td>Ethylbenzene</td>
<td>10.0 / 10</td>
<td>0.23</td>
<td>N/D</td>
<td>0.23</td>
<td>0.46</td>
</tr>
<tr>
<td>Hexane</td>
<td>10.0 / 10</td>
<td>2.53</td>
<td>N/D</td>
<td>0.36</td>
<td>2.89</td>
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<tr>
<td>Naphthalene</td>
<td>10.0 / 10</td>
<td>0.09</td>
<td>N/D</td>
<td>0.15</td>
<td>0.24</td>
</tr>
<tr>
<td>Toluene</td>
<td>10.0 / 10</td>
<td>1.75</td>
<td>N/D</td>
<td>0.89</td>
<td>2.64</td>
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<tr>
<td>Xylene</td>
<td>10.0 / 10</td>
<td>0.98</td>
<td>N/D</td>
<td>0.86</td>
<td>1.84</td>
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<tr>
<td>Total HAPs</td>
<td>25.0</td>
<td>6.04</td>
<td>N/D</td>
<td>2.78</td>
<td>8.82</td>
</tr>
</tbody>
</table>

N/A = Not Applicable; N/D = Not Determined
PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required. Potential emissions of all pollutants are below de minimis 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

- Start-Up, Shutdown, and Malfunction Conditions, 10 CSR 10-6.050
- Operating Permits, 10 CSR 10-6.065
- Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110
  ➢ Per 10 CSR 10-6.110(4)(B)(II) and (4)(B)2.C(II) a full EIQ is required for the first full calendar year the equipment (or modifications) approved by this permit are in operation.
- Restriction of Emission of Odors, 10 CSR 10-6.165
- Restriction of Emission of Visible Air Contaminants, 10 CSR 10-6.220

SPECIFIC REQUIREMENTS

- Control of Petroleum Liquid Storage, Loading, and Transfer, 10 CSR 10-5.220
- New Source Performance Regulations, 10 CSR 10-6.070
  ➢ Standards of Performance for Bulk Gasoline Terminals, 40 CFR Part 60, Subpart XX
- MACT Regulations, 10 CSR 10-6.075
STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, Construction Permits Required, it is recommended that this permit be granted with special conditions.

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated November 15, 2017, received November 20, 2017, designating J. D. Streett & Company, Inc. as the owner and operator of the installation.
APPENDIX A

Abbreviations and Acronyms

% .............. percent
°F .............. degrees Fahrenheit
acfm .......... actual cubic feet per minute
BACT ......... Best Available Control Technology
BMPs ........ Best Management Practices
Btu ............ British thermal unit
CAM ......... Compliance Assurance Monitoring
CAS .......... Chemical Abstracts Service
CEMS ...... Continuous Emission Monitor System
CFR......... Code of Federal Regulations
CO .......... carbon monoxide
CO₂ .......... carbon dioxide
CO₂equiv .... carbon dioxide equivalent
COMS ...... Continuous Opacity Monitoring System
CSR......... Code of State Regulations
dscf ......... dry standard cubic feet
EIQ .......... Emission Inventory Questionnaire
EP .......... Emission Point
EPA......... Environmental Protection Agency
EU ......... Emission Unit
fps ............. feet per second
ft ............... feet
GACT ...... Generally Available Control Technology
GHG......... Greenhouse Gas
gpm ........... gallons per minute
gr ........... grains
GWP .......... Global Warming Potential
HAP ............ Hazardous Air Pollutant
hr ............ hour
hp ............ horsepower
lb ............ pound
lbs/hr ......... pounds per hour
MACT ...... Maximum Achievable Control Technology
µg/m³ ....... micrograms per cubic meter
m/s .............. meters per second
Mgal ....... 1,000 gallons
MW ......... megawatt
MHDR ...... maximum hourly design rate
MMBtu .... Million British thermal units
MMCF .... million cubic feet
MSDS ...... Material Safety Data Sheet
NAAQS .... National Ambient Air Quality Standards
NESHAPs National Emissions Standards for Hazardous Air Pollutants
NOx ........ nitrogen oxides
NSPS ...... New Source Performance Standards
NSR .... New Source Review
PM .......... particulate matter
PM₂.₅ .... particulate matter less than 2.5 microns in aerodynamic diameter
PM₁₀ ...... particulate matter less than 10 microns in aerodynamic diameter
ppm .... parts per million
PSD .... Prevention of Significant Deterioration
PTE ........ potential to emit
RACT ...... Reasonable Available Control Technology
RAL ........ Risk Assessment Level
SCC .......... Source Classification Code
scfm .......... standard cubic feet per minute
SDS .......... Safety Data Sheet
SIC .......... Standard Industrial Classification
SIP .... State Implementation Plan
SMAL .... Screening Model Action Levels
SO₂ .......... sulfur oxides
SO₂ .......... sulfur dioxide
tph .......... tons per hour
tpy .......... tons per year
VMT .... vehicle miles traveled
VOC .... Volatile Organic Compound
Diesel Loading

Loading Losses (AP-42 Section 5.2)

\[ L_L = 12.46 \times \frac{\text{SPM}}{T} \]

\[ L_L = \text{loading loss (lb/Mgal)} \]
\[ S = \text{saturation factor} \]
\[ P = \text{vapor pressure of liquid (psia)} \]
\[ M = \text{molecular weight of vapors (lb/lbmol)} \]
\[ T = \text{temperature (°R)} \]

\[ S = 0.5 \text{ submerged barge loading} \]
\[ P = 0.0065 \text{ psia} \]
\[ M = 130 \text{ lb/lbmol} \]
\[ T = 520 \text{ °R} \]

Uncontrolled

\[ L_L = 0.010124 \text{ lb/Mgal} \]

HAP Content (from SDS)

- Cumene 1%
- Ethylbenzene 1%
- Naphthalene 1%
- Xylene 1%

Uncaptured Emission Factors

- VOC 0.01012375 lb/Mgal
- Cumene 0.000101238 lb/Mgal
- Ethylbenzene 0.000101238 lb/Mgal
- Naphthalene 0.000101238 lb/Mgal
- Xylene 0.000101238 lb/Mgal

Uncaptured Potential to Emit

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<th>ton/yr</th>
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</tr>
<tr>
<td>Xylene</td>
<td>0.013</td>
<td>0.056</td>
</tr>
</tbody>
</table>

MHDR

- 3000 bbl/hr
- 126 Mgal/hr
Gasoline Loading

June 2014 Stack Test Result
- 0.92 mg VOC/L gasoline
- 0.00767772 lb/Mgal

HAP Content (from SDS)
- Benzene: 1.3%
- Cumene: 4%
- Ethylbenzene: 4%
- Hexane: 8%
- Naphthalene: 2%
- Toluene: 20%
- Xylene: 18%

MHDR
- 3000 bbl/hr
- 126 Mgal/hr

Loading Loss Equation (AP-42 Section 5.2)
\[ L = 12.46 \times \text{SPM/T} \]
\[ S = 0.50 \quad \text{submerged barge loading} \]
\[ P = 6.9 \quad \text{psia} \]
\[ M = 62 \quad \text{lb/lbmol} \]
\[ T = 520 \quad ^\circ \text{R} \]
\[ L = 5.125373 \text{ lb/Mgal} \]

Capture Efficiency of Control Device
- 99.8%

Captured HAP Emission Factors
- 9.9811E-05 lb/Mgal
- 0.000007111 lb/Mgal
- 0.000015355 lb/Mgal
- 0.000153554 lb/Mgal
- 0.001381999 lb/Mgal

Uncaptured HAP Emission Factors
- 0.06662985 lb/Mgal
- 0.205014923 lb/Mgal
- 0.410029846 lb/Mgal
- 0.1025074615 lb/Mgal
- 0.922567154 lb/Mgal

Captured Potential to Emit
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<th>Pollutant</th>
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Uncaptured Potential to Emit
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<td>0.041</td>
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Summary

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<td>Hexane</td>
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<td>0.89</td>
</tr>
<tr>
<td>Xylene</td>
<td>0.86</td>
</tr>
<tr>
<td>Total HAPs</td>
<td>2.78</td>
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</tbody>
</table>
MAR 07 2018

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

RE: New Source Review Permit - Project Number: 2017-11-027

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 with your amended operating permit is 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.

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 the following website: http://dnr.mo.gov/regions/. The online CAV request can be found at http://dnr.mo.gov/cav/compliance.htm.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.oa.mo.gov/ahc.
If you have any questions regarding this permit, please do not hesitate to contact Ryan Schott, 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:rsj

Enclosures

c: St. Louis Regional Office
   PAMS File: 2017-11-027

Permit Number: 032018-002