



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

## DEPARTMENT OF NATURAL RESOURCES

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APR 05 2016

Mr. Richard Krejci  
Director - Operations  
Kinder Morgan Transmix Company  
4070 South First Street  
St. Louis, MO 63118

RE: New Source Review Temporary Permit Request - Project Number: 2016-03-098  
Installation ID Number: 510-2939  
Expiration Date: October 1, 2016  
Temporary Permit Number: **042016-004**

Dear Mr. Krejci:

The Missouri Department of Natural Resources' Air Pollution Control Program has completed a review of your request to operate a portable vapor combustion unit at Kinder Morgan Transmix Company, located in St. Louis, Missouri. The Air Pollution Control Program is hereby granting your request to conduct this temporary operation at this location in accordance with Missouri State Rule 10 CSR 10-6.060(3) with an expiration date of October 1, 2016.

The Kinder Morgan Transmix Company facility in South Saint Louis loads tank trucks with gasoline for local distribution. The truck loading rack is listed as emission points EP-18 and EP-19 in the facility's operating permit (OP No.10005. PAMS No. 2010-01-045). Emissions associated with this activity occur when gasoline vapors are displaced from the empty tanker as it is being filled. These emissions are collected and routed to a vapor recovery unit (VRU, carbon beds).

As stated in your letter dated March 30, 2016, on Friday March 25<sup>th</sup>, the vacuum pump on the VRU (Vapor Recovery Unit) failed. It was determined that the pump would need to be replaced or rebuilt and this process is estimated to take 5-6 weeks. A portable vapor combustion unit has been brought on-site to combust the VOCs and HAPs while the pump is repaired. The rental unit (EU34) is from Jordan Technologies capable of controlling emissions from truck loading with a MHDR of 5,200 gallons/minute. Total throughput is estimated at 72,000,000 gallons for the six month period.

The estimated emissions as stated in your application are as follows:

Table 1: Emission Summary

Pollutant	SMAL (tons per year)	PTE for 6 months (lbs.)	PTE for 6 months (tons)
VOCs	N/A	25,780.4	12.89
Benzene	2.0	164.4	0.097
Cumene	10.0	2.2	0.0011
Ethylbenzene	10.0	13.1	0.00655
Hexane	10.0	146.1	0.073
MTBE Methyl Tert-Butyl Ether	10.0	132.8	0.0664
Trimethylpentane	5.0	18.9	0.00945
Toluene	10.0	189.7	0.09485
Xylene	10.0	77.8	0.0389
TOTAL HAPs	N/A	745.0	0.3725

The following conditions also apply to this temporary activity:

1. Kinder Morgan shall be limited to load 72,000,000 gallons of gasoline during the time period of April 1, 2016 through October 1, 2016.
2. Kinder Morgan shall develop and use forms to demonstrate compliance with Special Condition 1. The forms shall contain at a minimum the following information,
  - 1) Installation name
  - 2) Installation ID
  - 3) Permit number
  - 4) Current month
  - 5) Current 12-month date range
  - 6) The total monthly throughput of gasoline
  - 7) Total gasoline throughput
  - 8) Indication of compliance status with Special Condition 1.
3. All appropriate record keeping shall be retained on site and available to Missouri Department of Natural Resources' Air Pollution Control Program personnel upon request.
4. Kinder Morgan 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 any exceedance of the limitations imposed by this permit.

The portable VCU from Jordon Technologies shall be subject to all requirements as stated in OP No. 10005 specifically for EP-18 and EP-19. The portable unit shall also meet all applicable air pollution rules as stated in 10 CSR 10-5.220 *Control of Petroleum Liquid Loading and Transfer* and 40 CFR Part 63 Subpart BBBBBB. You are also obligated to meet all applicable air pollution control rules, Department of Natural Resources' rules, or any other applicable federal, state, or local agency regulations. Specifically, you should avoid violating 10 CSR 10-6.045 *Open Burning Requirements*, 10 CSR 10-6.220, *Restriction of Emission of Visible Air*

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*Contaminants, 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, and 10 CSR 10-6.400 Restriction of Emission of Particulate Matter From Industrial Processes.*

A copy of this letter should be kept with the unit and be made available to Department of Natural Resources' personnel upon verbal request. If you have any questions regarding this determination, please do not hesitate to contact Kathy Kolb at the departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or by telephone at (573) 75 1-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

A handwritten signature in cursive script that reads "Kyra L. Moore". The signature is written in black ink and is positioned above the printed name and title.

Kyra L. Moore  
Director

KLM:kks

c: PAMS File: 2016-03-098  
Saint Louis Regional Office