



**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 here in.

**Intermediate Operating Permit Number:** OP2010-086  
**Expiration Date:** JUL 25 2015  
**Installation ID:** 077-0116  
**Project Number:** 2006-11-008

**Installation Name and Address**

Magellan Pipeline Company L.P.  
R.R. 2 Box 355  
Brookline, MO 65619  
Greene County

**Parent Company's Name and Address**

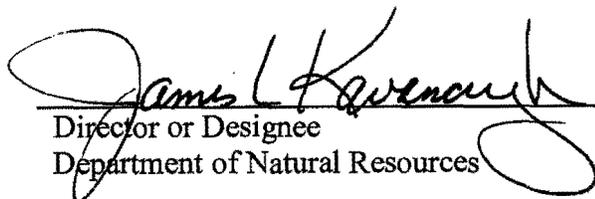
Magellan Pipeline Company, L.P.  
P.O. Box 22186, MD 27-3  
Tulsa, OK 74121

**Installation Description:**

Magellan Pipeline Company, L.P. - Springfield Terminal operates a petroleum product storage and loading facility. This installation receives petroleum products through underground pipelines, stores these products in large aboveground storage tanks, and loads tanker trucks with the products using a 4-spot loading rack with a vapor combustion unit (VCU).

JUL 26 2010

Effective Date

  
Director or Designee  
Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Magellan Pipeline Company, L.P. - Springfield Terminal operates a petroleum product storage and loading facility. This installation receives petroleum products through underground pipelines, stores these products in large aboveground storage tanks, and loads tanker trucks with the products using a 4-spot loading rack with a vapor combustion unit (VCU).

Reported Air Pollutant Emissions, tons per year								
Year	Particulate Matter ≤ Ten Microns (PM-10)	Particulate Matter ≤ 2.5 Microns (PM-2.5)	Sulfur Oxides (SO <sub>x</sub> )	Nitrogen Oxides (NO <sub>x</sub> )	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2009	0	0	0	7.29	50.33	18.23	0	0
2008	0	0	0	7.17	46.63	17.93	0	0
2007	0	0	0	6.73	44.63	16.84	0	0
2006	0	0	0	7.21	49.80	18.04	0	1.90
2005	0	0	0	6.72	46.58	16.82	0	0

### 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.

Emission Unit #	Description of Emission Unit
EU0010	Loading Rack
EU0020	Storage Tank #1510
EU0030	Storage Tank #4001
EU0040	Storage Tank #4002
EU0050	Storage Tank #4003
EU0060	Storage Tank #6017
EU0070	Storage Tank #121
EU0080	Storage Tank #122
EU0090	Storage Tank #796
EU0100	Storage Tank #6016
EU0110	Storage Tank #1511
EU0120	Additive Storage Tank #131

### **EMISSION UNITS WITHOUT LIMITATIONS**

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

#### Description of Emission Source

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Ethanol Unloading Skid

COP IVD - #228-120, 2000-gallon additive storage tank

Lubricity - #228-160, 4000-gallon additive storage tank

MPL IVD - #228-130, 12000-gallon additive storage tank

MFA PDA - #228-070, 3000-gallon additive storage tank

Shell IVD - #228-110, 12000-gallon additive storage tank

Red Dye - #228-133 (#6), 500-gallon additive storage tank

Anti-Stat - #228-137 (#7), 500-gallon additive storage tank

### **DOCUMENTS INCORPORATED BY REFERENCE**

This permit incorporates the following documents by reference:

- 1) Missouri Department of Natural Resources Construction Permit #0594-007, Issued April 29, 1994
- 2) Missouri Department of Natural Resources Construction Permit #0595-005, Issued April 29, 1995, Amended May 3, 1995

## 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.

### PERMIT CONDITION PW001

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) *Voluntary Limitation(s)*

#### Emission Limitation:

- 1) The permittee shall discharge less than 100 tons of total volatile organic compound pollutants (VOC) into the atmosphere from the entire installation during any consecutive 12-month period.
- 2) The permittee shall discharge less than 10 tons of any individual hazardous air pollutant (HAP) and less than 25 tons of hazardous air pollutants (HAPs) in aggregate into the atmosphere from the entire installation during any consecutive 12-month period.

#### Monitoring/Recordkeeping Requirements:

- 1) The permittee shall maintain accurate records of the type, volume, and period of storage for each product stored in the facility tanks or handled by the loading racks.
- 2) The permittee shall maintain on file material safety data sheets or other data sufficient to document the percent HAP constituents in the fuels handled.
- 3) The permittee shall calculate monthly VOC and HAP emissions associated with all storage, transfer and handling operations at this installation, including fugitive emissions. The permittee shall record all VOC and HAP emissions on a monthly basis with a consecutive 12-month total.
- 4) Attachments A and B contain logs satisfying these recordkeeping requirements. These logs, or equivalents created by the permittee, must be used to certify compliance with this requirement.
- 5) The permittee shall maintain these records on site for the most recent 60 months.
- 6) The permittee shall immediately make such records available to any Department of Natural Resources' personnel upon request.

#### Reporting Requirements:

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month, if the consecutive 12-month total records show that the source exceeded the limitation of less than 100 tons of VOC emissions, and/or less than 10 tons of individual HAP emissions, and/or less than 25 tons of aggregate HAP emissions..
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification as required by 10 CSR 10-6.065(5)(C)1.B. and Section V of this permit.

### PERMIT CONDITION PW002

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

Note: The permittee is not required to comply with the requirements of 40 CFR Part 63, Subpart BBBBBB, until the compliance date of January 10, 2011. [§63.11083(b)]

**Emission/Operational Limitation:**

- 1) The permittee shall perform a monthly leak inspection of all equipment in liquid or vapor gasoline service. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. Equipment means each valve, pump, pressure relief device, sampling connection system, open-ended valve or line, and flange or other connector in the gasoline liquid transfer and vapor collection systems. This definition also includes the entire vapor processing system except the exhaust port(s) or stack(s).
- 2) When a leak is detected, the permittee shall make an initial attempt at repair as soon as practicable, but no later than 5 calendar days after the leak is detected.
- 3) The permittee shall complete repair or replacement of leaking equipment within 15 calendar days after detection of each leak, except as provided in (4) below.
- 4) Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The permittee must document the reason(s) why the repair was not feasible and the date each repair was completed as described under Monitoring/Recordkeeping Requirements and include the event on the semiannual excess emissions report described in Reporting Requirements.
- 5) As an alternative to the monthly leak inspection described in paragraph [1)] of this section, the permittee may implement an instrument leak monitoring program that has been demonstrated to the Director as at least equivalent.

**Monitoring/Recordkeeping Requirements:**

- 1) The permittee shall prepare and maintain an up-to-date logbook which contains the following information for all equipment in gasoline service:
  - a) A list, summary description, or diagram(s) showing the location of all equipment in gasoline service;
  - b) All completed and signed leak inspection reports; and
  - c) A record of maintenance and repairs.
  - d) If the permittee elects to implement an instrument monitoring program to comply with the rule, the logbook shall also contain a full description of the monitoring program.
- 2) The permittee shall record the following information for each monthly leak inspection:
  - a) Date of inspection.
  - b) The equipment type and identification number;
  - c) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).
  - d) Each detection of a liquid or vapor leak shall be recorded in the logbook and shall include the leak determination method (i.e., sight, sound, or smell).
  - e) If a leak is identified, the permittee must also record the following:
    1. The nature of the leak (i.e., vapor or liquid)
    2. The date of each attempt to repair the leak
    3. Repair methods applied in each attempt to repair the leak;
    4. "Repair delayed" and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak;
    5. The expected date of successful repair of the leak if the leak is not repaired within 15 days; and
    6. The date of successful repair of the leak.
  - f) The name and signature of the person completing the inspection.
- 3) An authorized representative of the permittee shall sign the inspection record at the completion of each inspection.

- 4) Attachment C (Leak Inspection Log Sheet) and Attachment D (Maintenance and Repair Log) contain logs satisfying these recordkeeping requirements. These logs, or equivalent(s) created by the permittee, must be used to certify compliance with this requirement.
- 5) The permittee shall maintain these records on site for the most recent 60 months.
- 6) The permittee shall immediately make such records available to any Department of Natural Resources' personnel upon request.

**Reporting Requirements:**

- 1) The permittee shall submit a semiannual excess emissions report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 30 days following the end of the 6-month period containing the following information:
  - a) The number of equipment leaks not repaired within 15 days after detection.
  - b) For each occurrence of an equipment leak for which no repair attempt was made within 5 days or for which repair was not completed within 15 days after detection:
    - i. The date on which the leak was detected;
    - ii. The date of each attempt to repair the leak;
    - iii. The reasons for the delay of repair; and
    - iv. The date of successful repair.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification as required by 10 CSR 10-6.065(5)(C)1.B. and 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.

<b>EU0010 – LOADING RACK</b>			
Emission Unit	Description	Manufacturer/ Model #	2007 EIQ Reference #
EU0010	Product Loading Rack: 4- spot loading rack with vapor combustor unit (VCU); includes facility-wide fugitive emissions from valves, pumps, and flanges in gasoline service; MHDR 96,000 gal/hr; construction date 1994	Contractor	EP001

**PERMIT CONDITION EU0010-001**  
10 CSR 10-6.060 Construction Permits Required  
Construction Permit #0594-007, Issued April 29, 1994

**Operational Limitation:**

- 1) Volatile Organic Compound emissions will be controlled by a vapor combustive unit at all times the loading rack is operational. [CP #0594-007, Special Condition 1]
- 2) All emission controls proposed in the permit application for Construction Permit #0594-007 shall be well maintained and used as required to comply with the applicable regulations at any time this facility is in operation. [CP #0594-007, Special Condition 4]

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

**PERMIT CONDITION EU0010-002**  
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

**Emission Limitation:**

The permittee shall be limited to a throughput of no more than 385,000,000 gallons of gasoline and 200,000,000 gallons of distillate fuel oil #2 loaded per any consecutive 12-month period.

**Monitoring:**

The permittee shall monitor the monthly throughput of gasoline and distillate fuel oil #2.

**Recordkeeping:**

- 1) The permittee shall record the monthly throughput of gasoline and distillate fuel oil #2 and the sum on the most recent 12-month throughputs.
- 2) All records shall be maintained for five (5) years. They may be kept in either hard-copy form or on computer media.

- 3) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon their verbal request and presentation of identification.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

**PERMIT CONDITION EU0010-003**

10 CSR 10-6.070 New Source Performance Regulations  
40 CFR Part 60, Subpart A General Provisions and Subpart XX  
Standards of Performance for Bulk Gasoline Terminals

**Emission Limitation:**

The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded. [§60.502(b)]

**Equipment Specification/Operational Specification:**

- 1) The permittee shall comply with the requirements. [§60.502]
- a) Each affected facility shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading. [§60.502(a)]
  - b) Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack. [§60.502(d)]
  - c) Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures: [§60.502(e)]
    - i) The permittee shall obtain the vapor tightness documentation described in §60.505(b) for each gasoline tank truck which is to be loaded at the affected facility. [§60.502(e)(1)]
    - ii) The permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility. [§60.502(e)(2)]
    - iii) The permittee shall cross-check each tank identification number obtained in §60.502(e)(2) with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is maintained: [§60.502(e)(3)(i)]
      - (1) If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or [§60.502(e)(3)(i)(A)]
      - (2) If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually. [§60.502(e)(3)(i)(B)]
      - (3) If either the quarterly or semiannual cross-check provided in §60.502(e)(3)(i)(A) through (B) reveals that these conditions were not maintained, the source must return to biweekly monitoring until such time as these conditions are again met. [§60.502(e)(3)(ii)]
    - iv) The permittee shall notify the owner or operator of each non-vapor-tight gasoline tank truck loaded at the affected facility within 1 week of the documentation cross-check in §60.502(e)(3). [§60.502(e)(4)]

- v) The permittee shall take steps assuring that the non vapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained. [§60.502(e)(5)]
- vi) Alternate procedures to those described in §60.502(e)(1) through (5) for limiting gasoline tank truck loadings may be used upon application to, and approval by, the Director. [§60.502(e)(6)]
- d) The permittee shall act to assure that loadings of gasoline tank trucks at the affected facility are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system. [§60.502(f)]
- e) The permittee shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the affected facility. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks. [§60.502(g)]
- f) The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in §60.503(d) as follows: [§60.502(h)]
  - i) A pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with  $\pm 2.5$  mm of water precision, shall be calibrated and installed on the terminal's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline tank truck. [§60.503(d)(1)]
  - ii) During the performance test, the pressure shall be recorded every 5 minutes while a gasoline truck is being loaded; the highest instantaneous pressure that occurs during each loading shall also be recorded. Every loading position must be tested at least once during the performance test. [§60.503(d)(2)]
- g) No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water). [§60.502(i)]

**Monitoring:**

- 1) Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of §60.502(j), detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected. [§60.502(j)]
- 2) The permittee shall use a Flame Eye to monitor continuously the vapor collection system for the presence of a flame. If no flame is detected, the vapor collection system will be shutdown.

**Recordkeeping:**

- 1) The tank truck vapor tightness documentation required under §60.502(e)(1) shall be kept on file at the terminal in a permanent form available for inspection. [§60.505(a)]
- 2) The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, as a minimum, the following information: [§60.505(b)]
  - a) Test title: Gasoline Delivery Tank Pressure Test—EPA Reference Method 27. [§60.505(b)(1)]
  - b) Tank owner and address. [§60.505(b)(2)]
  - c) Tank identification number. [§60.505(b)(3)]

- d) Testing location. [§60.505(b)(4)]
  - e) Date of test. [§60.505(b)(5)]
  - f) Tester name and signature. [§60.505(b)(6)]
  - g) Witnessing inspector, if any: Name, signature, and affiliation. [§60.505(b)(7)]
  - h) Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs). [§60.505(b)(8)]
- 3) A record of each monthly leak inspection required under §60.502(j) shall be kept on file at the terminal for at least 5 years. Inspection records shall include, as a minimum, the following information: [§60.505(c)]
    - a) Date of inspection. [§60.505(c)(1)]
    - b) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak). [§60.505(c)(2)]
    - c) Leak determination method. [§60.505(c)(3)]
    - d) Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days). [§60.505(c)(4)]
    - e) Inspector name and signature. [§60.505(c)(5)]
  - 4) The permittee shall keep documentation of all notifications required under §60.502(e)(4) on file at the terminal for at least 5 years. [§60.505(d)]
  - 5) As an alternative to keeping records at the terminal of each gasoline cargo tank test result as required in §60.502(a), and (d), the permittee may comply with the requirements in either §60.502(e)(1) or (2). [§60.505(e)]
    - a) An electronic copy of each record is instantly available at the terminal. [§60.505(e)(1)]
      - i) The copy of each record in §60.502(e)(1) is an exact duplicate image of the original paper record with certifying signatures. [§60.505(e)(1)(i)]
      - ii) The permitting authority is notified in writing that each terminal using this alternative is in compliance with §60.502(e)(1). [§60.505(e)(1)(ii)]
    - b) For facilities that utilize a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading ( *e.g.*, via a card lock-out system), a copy of the documentation is made available ( *e.g.*, via facsimile) for inspection by permitting authority representatives during the course of a site visit, or within a mutually agreeable time frame. [§60.505(e)(2)]
      - i) The copy of each record in §60.502(e)(2) is an exact duplicate image of the original paper record with certifying signatures. [§60.505(e)(2)(i)]
      - ii) The permitting authority is notified in writing that each terminal using this alternative is in compliance with §60.502(e)(2). [§60.505(e)(2)(ii)]
  - 6) The permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least 5 years. [§60.505(f)]

**Reporting:**

- 1) The permittee shall submit to the Director a written report of the results of each performance test on the vapor processing system required by §60.503(a). [§60.503 (a) and §60.8]
- 2) The permittee shall notify the owner or operator of each non-vapor-tight gasoline tank truck loaded at the facility within one week of the documentation crosscheck in §60.502(e)(3). [§60.502(e)(4)]
- 3) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

**PERMIT CONDITION EU0010-004**

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations  
40 CFR Part 63, Subpart A General Provisions and Subpart BBBBBB, National Emission Standards  
for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants,  
and Pipeline Facilities

Note: The permittee is not required to comply with the requirements of 40 CFR Part 63, subpart BBBBBB until the compliance date of January 10, 2011. [§63.11083(b)]

**Emission Limitation/Operational Specification:**

The emission limit and management practices in Permit Condition EU0010-003 are as stringent as or more stringent than those contained in 40 CFR Part 63 subpart BBBBBB. Therefore, there are no additional emission limitations or operational specifications.

**Testing:**

- 1) Based on the emission limit established in Permit Condition EU0010-003, the permittee may submit a statement by a responsible official certifying the compliance status of the loading rack in lieu of the test required under §63.11092(a)(1). [§63.11092(a)(2)]
- 2) If the permittee has chosen to submit a statement by a responsible official certifying the compliance status of the loading rack in lieu of the test required under §63.11092(a)(1), the monitored operating parameter value may be determined according to the provisions in §63.11092(b)(5)(i) or §63.11092(b)(5)(ii). [§63.11092(b)(5)]
  - a) Monitor an operating parameter that has been approved by the Director and is specified in your facility's current enforceable operating permit. At the time that the Director requires a new performance test, you must determine the monitored operating parameter value according to the requirements specified in §63.11092(b). [§63.11092(b)(5)(i)]
  - b) Determine an operating parameter value based on engineering assessment and the manufacturer's recommendation and submit the information specified below in §63.11092(b)(4) for approval by the Director. At the time that the Director requires a new performance test, you must determine the monitored operating parameter value according to the requirements specified in §63.11092(b). [§63.11092(b)(5)(i)]
    - i) Provide for the Director's approval the rationale for the selected operating parameter value, monitoring frequency, and averaging time, including data and calculations used to develop the value and a description of why the value, monitoring frequency, and averaging time demonstrate continuous compliance with the emission standard in §63.11088(a). [§63.11092(b)(4)]
- 3) For performance tests performed after the initial test required under §63.11092(a), the permittee shall document the reasons for any change in the operating parameter value since the previous performance test. [§63.11092(c)]
- 4) The annual certification test for gasoline cargo tanks shall consist of the test method specified in §63.11092(f)(1). [§63.11092(f)]
  - a) *EPA Method 27, Appendix A-8, 40 CFR Part 60.* Conduct the test using a time period (t) for the pressure and vacuum tests of 5 minutes. The initial pressure ( $P_i$ ) for the pressure test shall be 460 millimeters (mm) of water (18 inches of water), gauge. The initial vacuum ( $V_i$ ) for the vacuum test shall be 150 mm of water (6 inches of water), gauge. The maximum allowable pressure and vacuum changes ( $\Delta p$ ,  $\Delta v$ ) for all affected gasoline cargo tanks is 3 inches of water, or less, in 5 minutes. [§63.11092(f)(1)]

**Monitoring:**

- 1) The permittee shall perform a monthly leak inspection of all equipment in gasoline service, as defined in §63.11100. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. [§63.11089(a)]
- 2) When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak, except as provided in §63.11089(d). [§63.11089(c)]
- 3) Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The owner or operator shall provide in the semiannual report specified in §63.11095(b), the reason(s) why the repair was not feasible and the date each repair was completed. [§63.11089(d)]
- 4) The permittee shall operate the vapor processing system in a manner not to exceed or not to go below, as appropriate, the alternative operating parameter value. [§63.11092(d)(2)]
- 5) Operation of the vapor processing system in a manner exceeding or going below the operating parameter value, as appropriate, shall constitute a violation of the emission standard in §63.11088(a). [§63.11092(d)(3)]
- 6) §63.11092(d)(4) states for the monitoring and inspection, as required under paragraphs (b)(1)(i)(B)( 2 ) and (b)(1)(iii)(B)( 2 ) of this section, malfunctions that are discovered shall not constitute a violation of the emission standard in §63.11088(a) if corrective actions as described in the monitoring and inspection plan are followed. The owner or operator must:
  - a) Initiate corrective action to determine the cause of the problem within 1 hour;
  - b) Initiate corrective action to fix the problem within 24 hours;
  - c) Complete all corrective actions needed to fix the problem as soon as practicable consistent with good air pollution control practices for minimizing emissions;
  - d) Minimize periods of start-up, shutdown, or malfunction; and
  - e) Take any necessary corrective actions to restore normal operation and prevent the recurrence of the cause of the problem

**Recordkeeping:**

- 1) *Monthly Leak Inspection.* A monthly leak inspection log book shall be used and shall be signed by the permittee at the completion of each inspection. A section of the log book shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility. [§63.11089(b)]
- 2) Each detection of a liquid or vapor leak shall be recorded in the log book. [§63.11089(c)]
- 3) The permittee shall record in the log book for each leak that is detected the information specified in §63.11094(e)(1) through (7). [§63.11094(e)]
  - a) The equipment type and identification number. [§63.11094(e)(1)]
  - b) The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell). [§63.11094(e)(2)]
  - c) The date the leak was detected and the date of each attempt to repair the leak. [§63.11094(e)(3)]
  - d) Repair methods applied in each attempt to repair the leak. [§63.11094(e)(4)]
  - e) “Repair delayed” and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak. [§63.11094(e)(5)]
  - f) The expected date of successful repair of the leak if the leak is not repaired within 15 days. [§63.11094(e)(6)]
  - g) The date of successful repair of the leak. [§63.11094(e)(7)]

- 4) *Gasoline Cargo Tank Loading*. The permittee shall keep records of the test results for each gasoline cargo tank loading at the facility as specified in §63.11094(b)(1) and (2). [§63.11094(b)]
  - a) Annual certification testing performed under §63.11092(f)(1) . [§63.11094(b)(1)]
  - b) The documentation file shall be kept up-to-date for each gasoline cargo tank loading at the facility. The documentation for each test shall include, as a minimum, the following information: [§63.11094(b)(2)]
    - i) *Name of test*: Annual Certification Test—Method 27. [§63.11094(b)(2)(i)]
    - ii) Cargo tank owner's name and address. [§63.11094(b)(2)(ii)]
    - iii) Cargo tank identification number. [§63.11094(b)(2)(iii)]
    - iv) Test location and date. [§63.11094(b)(2)(iv)]
    - v) Tester name and signature. [§63.11094(b)(2)(v)]
    - vi) *Witnessing inspector, if any*: Name, signature, and affiliation. [§63.11094(b)(2)(vi)]
    - vii) *Vapor tightness repair*: Nature of repair work and when performed in relation to vapor tightness testing. [§63.11094(b)(2)(vii)]
    - viii) *Test results*: Test pressure; pressure or vacuum change, mm of water; time period of test; number of leaks found with instrument; and leak definition. [§63.11094(b)(2)(viii)]
- 5) As an alternative to keeping records at the terminal of each gasoline cargo tank test result as required in §63.11094(b), the permittee may comply with the requirements in either §63.11094(c)(1) or §63.11094(c)(2). [§63.11094(c)]
  - a) An electronic copy of each record is instantly available at the terminal. [§63.11094(c)(1)]
    - i) The copy of each record in §63.11094(c)(1) is an exact duplicate image of the original paper record with certifying signatures. [§63.11094(c)(1)(i)]
    - ii) The Director is notified in writing that each terminal using this alternative is in compliance with §63.11094(c)(1). [§63.11094(c)(1)(ii)]
  - b) For facilities that use a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection by the Director's delegated representatives during the course of a site visit, or within a mutually agreeable time frame. [§63.11094(c)(2)]
    - i) The copy of each record in §63.11094(c)(2) is an exact duplicate image of the original paper record with certifying signatures. [§63.11094(c)(2)(i)]
    - ii) The Administrator is notified in writing that each terminal using this alternative is in compliance with §63.11094(c)(2). [§63.11094(c)(2)(ii)]
- 6) The permittee shall prepare and maintain a record describing the types, identification numbers, and locations of all equipment in gasoline service. For facilities electing to implement an instrument program under §63.11089, the record shall contain a full description of the program. [§63.11094(d)]
- 7) The permittee shall keep an up-to-date, readily accessible record of the continuous monitoring data required under §63.11092(b). This record shall indicate the time intervals during which loadings of gasoline cargo tanks have occurred or, alternatively, shall record the operating parameter data only during such loadings. The date and time of day shall also be indicated at reasonable intervals on this record. [§63.11094(f)(1)]
- 8) The permittee shall record and report simultaneously with the Notification of Compliance Status required under §63.11093(b): [§63.11094(f)(2)]
  - a) All data and calculations, engineering assessments, and manufacturer's recommendations used in determining the operating parameter value under §63.11092(b). [§63.11094(f)(2)(i)]

- 9) If the permittee requests approval to use a vapor processing system or monitor an operating parameter other than those specified in §63.11092(b), the permittee shall submit a description of planned reporting and recordkeeping procedures. [§63.11094(f)(5)]

**Reporting:**

- 1) *Initial Notification.* The permittee must submit an Initial Notification as specified in §63.9(b). If the facility is in compliance with the requirements of subpart BBBB at the time the Initial Notification is due, the Notification of Compliance Status required under §63.11093(b) may be submitted in lieu of the Initial Notification. [§63.11093(a)]
- 2) *Notification of Compliance Status.* The permittee must submit a Notification of Compliance Status as specified in §63.9(h). [§63.11093(b)]
- 3) *Notification of Performance Test.* The permittee must submit a Notification of Performance Test, as specified in §63.9(e), prior to initiating testing required by §63.11092(a) or §63.11092(b). [§63.11093(c)]
- 4) The permittee must submit additional notifications specified in §63.9, as applicable. [§63.11093(d)]
- 5) *Semiannual Compliance Report.* The permittee shall include in a semiannual compliance report to the Director the following information, as applicable: [§63.11095(a)]
  - a) For loading racks, each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility. [§63.11095(a)(2)]
  - b) For equipment leak inspections, the number of equipment leaks not repaired within 15 days after detection. [§63.11095(a)(3)]
- 6) *Excess Emissions Report.* The permittee shall submit an excess emissions report to the Director at the time the semiannual compliance report is submitted. Excess emissions events under subpart BBBB, and the information to be included in the excess emissions report, are specified in §63.11095(b)(1) through (5). [§63.11095(b)]
  - a) Each instance of a non-vapor-tight gasoline cargo tank loading at the facility in which the owner or operator failed to take steps to assure that such cargo tank would not be reloaded at the facility before vapor tightness documentation for that cargo tank was obtained. [§63.11095(b)(1)]
  - b) Each reloading of a non-vapor-tight gasoline cargo tank at the facility before vapor tightness documentation for that cargo tank is obtained by the facility in accordance with §63.11094(b). [§63.11095(b)(2)]
  - c) Each exceedance or failure to maintain, as appropriate, the monitored operating parameter value determined under §63.11092(b). The report shall include the monitoring data for the days on which exceedances or failures to maintain have occurred, and a description and timing of the steps taken to repair or perform maintenance on the vapor collection and processing systems or the CMS. [§63.11095(b)(3)]
  - d) For each occurrence of an equipment leak for which no repair attempt was made within 5 days or for which repair was not completed within 15 days after detection: [§63.11095(b)(5)]
    - i) The date on which the leak was detected; [§63.11095(b)(5)(i)]
    - ii) The date of each attempt to repair the leak; [§63.11095(b)(5)(ii)]
    - iii) The reasons for the delay of repair; and [§63.11095(b)(5)(iii)]
    - iv) The date of successful repair. [§63.11095(b)(5)(iv)]

<b>EU0020 – STORAGE TANK #1510</b>			
Emission Unit	Description	Manufacturer/ Model #	2007 EIQ Reference #
EU0020	Tank #1510: 2,327,346-gallon gasoline storage tank, internal floating roof; construction date 1998	NA	EP010

**PERMIT CONDITION EU0020-001**  
 10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

**Emission Limitations:**

The permittee shall limit the throughput for Tank #1510 (EU0020) to 242,043,984 gallons in any consecutive 12-month period. Tank throughput includes tank-to-tank transfers, re-origination to pipeline, and product distributed via loading rack.

**Recordkeeping:**

- 1) The permittee shall maintain records of the products stored in Tank #1510 (EU0020).
- 2) The permittee shall record the monthly throughput of gasoline and the sum on the most recent 12-month throughputs.
- 3) These records shall be kept for at least five (5) years. They may be kept in either hard-copy form or on computer media.
- 4) These records shall immediately be made available for inspection by Department of Natural Resources’ personnel upon their verbal request and presentation of identification.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

**PERMIT CONDITION EU0020-002**  
 10 CSR 10-6.070 New Source Performance Regulations  
 40 CFR Part 60, Subpart A General Provisions and Subpart Kb Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23,1984

Note: EU0020 has a design capacity greater than 151 m<sup>3</sup> and contains a volatile organic liquid (VOL) that, as stored, has a maximum true vapor pressure greater than 5.2 kPa but less than 76.6 kPa. According to §60.112b(a), the permittee must equip this storage vessel with either (1) a fixed roof in combination with an internal floating roof, (2) an external floating roof, (3) a closed vent system and control device or (4) an alternative means of emission limitation. The permittee has chosen to equip the storage vessel with a fixed roof in combination with an internal floating roof. Therefore §60.112b(a)(1) of this regulation applies.

**Operational Specifications:**

- 1) The permittee shall equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications: [§60.112b(a)(1)]
  - a) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals

- when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. [§60.112b(a)(1)(i)]
- b) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: [§60.112b(a)(1)(ii)]
    - i) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank. [§60.112b(a)(1)(ii)(A)]
    - ii) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous. [§60.112b(a)(1)(ii)(B)]
    - iii) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof. [§60.112b(a)(1)(ii)(C)]
  - c) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface. [§60.112b(a)(1)(iii)]
  - d) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [§60.112b(a)(1)(iv)]
  - e) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [§60.112b(a)(1)(v)]
  - f) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [§60.112b(a)(1)(vi)]
  - g) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [§60.112b(a)(1)(vii)]
  - h) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. [§60.112b(a)(1)(viii)]
  - i) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [§60.112b(a)(1)(ix)]

**Monitoring:**

- 1) After installing the control equipment required to meet §60.112b(a)(1) (permanently affixed roof and internal floating roof), the permittee shall: [§60.113b(a)]
  - a) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof,

or both, the owner or operator shall repair the items before filling the storage vessel.

[§60.113b(a)(1)]

- b) For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Director in the inspection report required in §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. [§60.113b(a)(2)]
  - i) For vessels equipped with a double-seal system as specified in §60.112b(a)(1)(ii)(B): [§60.113b(a)(3)]
  - ii) Visually inspect the vessel as specified in §60.113b(a)(4) at least every 5 years; or [§60.113b(a)(3)(i)]
- c) Visually inspect the vessel as specified in §60.113b(a)(2). [§60.113b(a)(3)(ii)]
- d) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with Subpart Kb occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in §60.113b(a)(2) and (a)(3)(ii) and at intervals no greater than 5 years in the case of vessels specified in §60.113b(a)(3)(i). [§60.113b(a)(4)]

**Recordkeeping:**

- 1) The permittee shall keep records and furnish reports as required by §60.115b and §60.116b. The permittee shall keep copies of all reports and records required for at least 5 years with the following exception: [§60.115b and §60.116b(a)]
  - a) The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be kept for the life of the source. [§60.116b(b)]
- 2) After installing control equipment in accordance with §60.112b(a)(1) (fixed roof and internal floating roof), the permittee shall meet the following record keeping requirements. [§60.115b(a)]
  - a) Keep a record of each inspection performed as required by §60.113b(a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). [§60.115b(a)(2)]
- 3) The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. [§60.116b(b)]

- 4) The permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. [§60.116b(c)]
- 5) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below. [§60.116b(e)]
  - a) 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. [§60.116b(e)(1)]
  - b) For crude oil or refined petroleum products the vapor pressure may be obtained by the following: [§60.116b(e)(2)]
    - i) Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference - see §60.17), unless the Director specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s). [§60.116b(e)(2)(i)]
    - ii) The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa. [§60.116b(e)(2)(ii)]
  - c) For other liquids, the vapor pressure: [§60.116b(e)(3)]
    - i) May be obtained from standard reference texts, or [§60.116b(e)(3)(i)]
    - ii) Determined by ASTM D2879–83, 96, or 97 (incorporated by reference-see §60.17); or [§60.116b(e)(3)(ii)]
    - iii) Measured by an appropriate method approved by the Director; or [§60.116b(e)(3)(iii)]
    - iv) Calculated by an appropriate method approved by the Director. [§60.116b(e)(3)(iv)]

**Reporting:**

- 1) After installing control equipment in accordance with §60.112b(a)(1) (fixed roof and internal floating roof), the permittee shall meet the following reporting requirements. [§60.115b(a)]
  - a) Furnish the Director with a report that describes the control equipment and certifies that the control equipment meets the specifications of §60.112b(a)(1) and §60.113b(a)(1). This report shall be an attachment to the notification required by §60.7(a)(3). [§60.115b(a)(1)]
  - b) If any of the conditions described in §60.113b(a)(2) are detected during the annual visual inspection required by §60.113b(a)(2), a report shall be furnished to the Director within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made. [§60.115b(a)(3)]
  - c) After each inspection required by §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in §60.113b(a)(3)(ii), a report shall be furnished to the Director within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of §61.112b(a)(1) or §60.113b(a)(3) and list each repair made. [§60.115b(a)(4)]
  - d) Notify the Director in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by §60.113b(a)(1) and (a)(4) to afford the Director the opportunity to have an observer present. If the inspection required by §60.113b(a)(4) is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Director at least 7 days prior

to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Director at least 7 days prior to the refilling. [§60.113b(a)(5)]

**PERMIT CONDITION EU0020-003**  
 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations  
 40 CFR Part 63, Subpart A General Provisions and Subpart BBBBBB, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

Note: The permittee is not required to comply with the requirements of 40 CFR Part 63, subpart BBBBBB until the compliance date of January 10, 2011. [§63.11083(b)]

**Operational Specifications/Monitoring/Recordkeeping/ Reporting:**

Since Storage Tank #1510 (EU0020) complies with the control requirements of 40 CFR Part 60, subpart Kb (see Permit Condition EU0020-002), the storage tank will be deemed in compliance with 40 CFR Part 63 subpart BBBBBB. Therefore, there are no additional operational specifications, monitoring or recordkeeping requirements. The permittee must report this determination in the Notification of Compliance Status report under §63.11093(b). Note that the Notification of Compliance Status must specify which of the compliance options for storage tanks included in Table 1 of subpart BBBBBB is used to comply with subpart BBBBBB. [§63.11087(f)]

<b>EU0030 – STORAGE TANK #4001 EU0040 – STORAGE TANK #4002 EU0050 – STORAGE TANK #4003 EU0060 – STORAGE TANK #6017</b>			
Emission Unit	Description	Manufacturer/ Model #	2007 EIQ Reference #
EU0030	Tank #4001: 1,562,106-gallon gasoline storage tank, internal floating roof; construction date 1967	NA	EP003
EU0040	Tank #4002: 1,561,854-gallon gasoline storage tank, internal floating roof; construction date 1967	NA	EP004
EU0050	Tank #4003: 1,561,980-gallon gasoline storage tank, internal floating roof; construction date 1967	NA	EP005
EU0060	Tank #6017: 753,648-gallon gasoline and ethanol storage tank, internal floating roof; construction date 1967	NA	EP007

**PERMIT CONDITION (EU0030 through EU0060)-001**  
 10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

**Emission Limitations:**

- 1) The permittee shall limit the throughput for Tank #4001 (EU0030) to 162,459,024 gallons in any consecutive 12-month period. Tank throughput includes tank-to-tank transfers, re-origination to pipeline, and product distributed via loading rack.

- 2) The permittee shall limit the throughput for Tank #4002 (EU0030) to 162,459,024 gallons in any consecutive 12-month period. Tank throughput includes tank-to-tank transfers, re-origination to pipeline, and product distributed via loading rack.
- 3) The permittee shall limit the throughput for Tank #4003 (EU0050) to 162,459,024 gallons in any consecutive 12-month period. Tank throughput includes tank-to-tank transfers, re-origination to pipeline, and product distributed via loading rack.
- 4) The permittee shall limit the throughput for Tank #6017 (EU0060) to 78,379,392 gallons in any consecutive 12-month period. Tank throughput includes tank-to-tank transfers, re-origination to pipeline, and product distributed via loading rack.

**Recordkeeping:**

- 1) The permittee shall maintain records of the products stored in Tanks #4001, #4002, #4003, and #6017 (EU0030 through EU0060).
- 2) The permittee shall record the monthly throughput of gasoline and the sum on the most recent 12-month throughputs.
- 3) These records shall be kept for at least five (5) years. They may be kept in either hard-copy form or on computer media.
- 4) These records shall immediately be made available for inspection by Department of Natural Resources' personnel upon their verbal request and presentation of identification.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

**PERMIT CONDITION (EU0030 through EU0060)-002**

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations  
40 CFR Part 63, Subpart A General Provisions and Subpart BBBBBB, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

Note: The permittee is not required to comply with the requirements of 40 CFR Part 63, subpart BBBBBB until the compliance date of January 10, 2011, except that storage vessels equipped with floating roofs and not meeting the emission limitation and operations specifications requirements of §63.11087(a) must be in compliance at the first degassing and cleaning activity after January 10, 2011 or by January 10, 2018, whichever is first. [§63.11087(b)]

**Operational Specifications:**

- 1) The permittee has opted to equip each internal floating roof gasoline storage tank according to the requirements in §60.112b(a)(1) of chapter 40, except for the secondary seal requirements under §60.112b(a)(1)(ii)(B) and the requirements in §60.112b(a)(1)(iv) through (ix) of chapter 40; or [§63.11087(a) and Table 1 to subpart BBBBBB]
  - a) The permittee shall equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications: [§60.112b(a)(1)]
    - i) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and

refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

[§60.112b(a)(1)(i)]

- ii) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:

[§60.112b(a)(1)(ii)]

(1) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank. [§60.112b(a)(1)(ii)(A)]

(2) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof. [§60.112b(a)(1)(ii)(C)]

- iii) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface. [§60.112b(a)(1)(iii)]

**Monitoring:**

- 1) The permittee must perform inspections of the floating roof system according to the requirements of §60.113b(a). [§63.11092(e)(1)]
- a) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel. [§60.113b(a)(1)]
- b) For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Director in the inspection report required in §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. [§60.113b(a)(2)]
- c) For vessels equipped with a double-seal system as specified in §60.112b(a)(1)(ii)(B): [§60.113b(a)(3)]
- i) Visually inspect the vessel as specified in §60.113b(a)(4) at least every 5 years; or [§60.113b(a)(3)(i)]
- ii) Visually inspect the vessel as specified in §60.113b(a)(2). [§60.113b(a)(3)(ii)]
- d) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other

openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with Subpart Kb occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in §60.113b(a)(2) and (a)(3)(ii) and at intervals no greater than 5 years in the case of vessels specified in §60.113b(a)(3)(i).  
[§60.113b(a)(4)]

**Recordkeeping:**

- 1) The permittee shall keep records as specified in §60.115b, except records shall be kept for at least 5 years. [§63.11094(a)]
  - a) Keep a record of each inspection performed as required by §60.113b(a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). [§60.115b(a)(2)]
- 2) The permittee shall record and report simultaneously with the Notification of Compliance Status required under §63.11093(b): [§63.11094(f)(2)]
  - a) All data and calculations, engineering assessments, and manufacturer's recommendations used in determining the operating parameter value under §63.11092(e). [§63.11094(f)(2)(i)]

**Reporting:**

- 1) *Initial Notification, Notification of Compliance Status and Notification of Performance Test* requirements are listed in Permit Condition EU0010-004. Note that the Notification of Compliance Status must specify which of the compliance options for storage tanks included in Table 1 of subpart BBBBBB is used to comply with subpart BBBBBB.
- 2) The permittee shall include in a semiannual compliance report to the Director the following information, as applicable: [§63.11095(a) and §63.11095(a)(1)]
  - a) After installing control equipment in accordance with §60.112b(a)(1) (fixed roof and internal floating roof), the permittee shall meet the following reporting requirements. [§60.115b(a)]
    - i) Furnish the Director with a report that describes the control equipment and certifies that the control equipment meets the specifications of §60.112b(a)(1) and §60.113b(a)(1). This report shall be an attachment to the notification required by §60.7(a)(3). [§60.115b(a)(1)]
    - ii) If any of the conditions described in §60.113b(a)(2) are detected during the annual visual inspection required by §60.113b(a)(2), a report shall be furnished to the Director within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made. [§60.115b(a)(3)]
    - iii) After each inspection required by §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in §60.113b(a)(3)(ii), a report shall be furnished to the Director within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of §61.112b(a)(1) or §60.113b(a)(3) and list each repair made. [§60.115b(a)(4)]
    - iv) Notify the Director in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by §60.113b(a)(1) and (a)(4) to afford the Director the opportunity to have an observer present. If the inspection required by §60.113b(a)(4) is

not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Director at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Director at least 7 days prior to the refilling. [§60.113b(a)(5)]

<b>EU0070 – STORAGE TANK #121 EU0080 – STORAGE TANK #122</b>			
Emission Unit	Description	Manufacturer/ Model #	2007 EIQ Reference #
EU0070	Tank #121: 32,550-gallon transmix storage tank, vertical fixed roof; construction date 1967	NA	EP008
EU0080	Tank #122: 32,508-gallon transmix storage tank, vertical fixed roof; construction date 1967	NA	EP009

<p><b>PERMIT CONDITION (EU0070 and EU0080)-001</b>          10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)</p>
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**Emission Limitations:**

- 1) The permittee shall limit the throughput for Tank #121 (EU0070) to 65,100 gallons in any consecutive 12-month period. Tank throughput includes tank-to-tank transfers, re-origination to pipeline, and product distributed via loading rack.
- 2) The permittee shall limit the throughput for Tank #122 (EU0080) to 65,100 gallons in any consecutive 12-month period. Tank throughput includes tank-to-tank transfers, re-origination to pipeline, and product distributed via loading rack.

**Recordkeeping:**

- 1) The permittee shall maintain records of the products stored in Tanks #121 and #122 (EU0070 and EU0080).
- 2) The permittee shall record the monthly throughput of transmix and the sum on the most recent 12-month throughputs.
- 3) These records shall be kept for at least five (5) years. They may be kept in either hard-copy form or on computer media.
- 4) These records shall immediately be made available for inspection by Department of Natural Resources’ personnel upon their verbal request and presentation of identification.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

<b>EU0090 – STORAGE TANK #796</b> <b>EU0100 – STORAGE TANK #6016</b> <b>EU0110 – STORAGE TANK #1511</b>			
Emission Unit	Description	Manufacturer/ Model #	2007 EIQ Reference #
EU0090	Tank #796: 1,157,730-gallon distillate oil #2 storage tank; vertical fixed roof; construction date 1967	NA	EP002
EU0100	Tank #6016: 754,530-gallon distillate oil #2 storage tank; vertical fixed roof; construction date 1967	NA	EP006
EU0110	Tank #1511: 2,278,878-gallon distillate oil #2 storage tank, internal floating roof; construction date 1998	NA	EP011

<b>PERMIT CONDITION (EU0090 through EU0110)-001</b> 10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)
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**Emission Limitations:**

- 1) The permittee shall limit the throughput for Tank #796 (EU0090) to 120,403,920 gallons in any consecutive 12-month period. Tank throughput includes tank-to-tank transfers, re-origination to pipeline, and product distributed via loading rack.
- 2) The permittee shall limit the throughput for Tank #6016 (EU0100) to 78,471,120 gallons in any consecutive 12-month period. Tank throughput includes tank-to-tank transfers, re-origination to pipeline, and product distributed via loading rack.
- 3) The permittee shall limit the throughput for Tank #1511 (EU0110) to 237,003,312 gallons in any consecutive 12-month period. Tank throughput includes tank-to-tank transfers, re-origination to pipeline, and product distributed via loading rack.

**Recordkeeping:**

- 1) The permittee shall maintain records of the products stored in Tanks #796, #6016, and #1511 (EU0090 through EU0110).
- 2) The permittee shall record the monthly throughput and the sum on the most recent 12-month throughputs.
- 3) These records shall be kept for at least five (5) years. They may be kept in either hard-copy form or on computer media.
- 4) These records shall immediately be made available for inspection by Department of Natural Resources' personnel upon their verbal request and presentation of identification.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

**PERMIT CONDITION EU0110-002**

10 CSR 10-6.070 New Source Performance Regulations  
40 CFR Part 60, Subpart A General Provisions and Subpart Kb Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984

**Recordkeeping:**

- 1) The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be kept for the life of the source. [§60.116b(b)]
- 2) These records shall immediately be made available for inspection by Department of Natural Resources' personnel upon their verbal request and presentation of identification.

**EU0120 – ADDITIVE STORAGE TANK #131**

Emission Unit	Description	Manufacturer/ Model #	2007 EIQ Reference #
EU0120	Tank #131: 1000-gallon additive storage tank 228-131 (#5); construction date 1995	NA	NA

**PERMIT CONDITION EU0120-001**

10 CSR 10-6.060 Construction Permits Required  
Construction Permit #0595-005, Issued April 29, 1995, Amended May 3, 1995

**Monitoring/Recordkeeping:**

The permittee shall maintain records on-site that show the throughput from Additive Storage Tank #131 (EU0120) on a monthly basis using a "Monthly Product Removal Record Table." Attachment E is suitable for this purpose. These records shall be made immediately available to Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

## 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.

### **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) Best 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 list to the Director in writing at least ten days prior to any maintenance, start-up or shutdown, 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, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the Director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 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. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

### **10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information**

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 3) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the Director.

### **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 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin**

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the Director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

- 3) Should it be determined that noncompliance has occurred, the Director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
  - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
  - b) Paving or frequent cleaning of roads, driveways and parking lots;
  - c) Application of dust-free surfaces;
  - d) Application of water; and
  - e) Planting and maintenance of vegetative ground cover.

#### **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 10-6.045 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) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
  - (A) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
    1. Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
    2. Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
    3. St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
    4. St. Louis metropolitan area. The open burning of household refuse is prohibited;
  - (B) Yard waste, with the following exceptions:
    1. Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;

2. Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
  3. St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
    - A. A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
    - B. A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
    - C. The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
    - D. In each instance, the twenty-one (21)-day burning period shall be determined by the Director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the Department Director; and
  4. St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- (3) 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.
- (4) Magellan Pipeline Company L.P. may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Magellan Pipeline Company L.P. fails to comply with the provisions or any condition of the open burning permit.
- (A) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- (5) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.

- (6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

**10 CSR 10-4.070 Restriction on Emission of Odors**

**This requirement is not federally enforceable.**

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.

**Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone**

- 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 §82.106.
  - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in §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:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §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 §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 as specified 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.

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*

#### **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 by a permittee:
  - 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.

## 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)(C)1 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's 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. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. 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)**

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

**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, 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**

- 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 written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. 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)12 Responsible Official**

The application utilized in the preparation of this permit was signed by Rick A. Olson, Vice President - Pipeline Operations & Technical Services. 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) The Missouri Department of Natural Resources 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**  
 Volatile Organic Compound (VOC) Emissions Log  
 Magellan Pipeline Company L.P.

Month / Year	Equipment Name / (EP/EU ID)	Material Handled	Amount (gallons)	VOC Emissions (tons)	12-month Rolling Total (tons)
	EU0610 <sup>1</sup>	Calculated EF	Total Hours		
	Total All:				
	EU0610 <sup>1</sup>	Calculated EF	Total Hours		
	Total All:				
	EU0610 <sup>1</sup>	Calculated EF	Total Hours		
	Total All:				

<sup>1</sup> NOTE: All facility VOC emissions, including fugitive emissions associated with valves, pump seals, and other fittings, connectors, flanges, and sample points, must be counted in the totals.

DUPLICATE THIS FORM AS NEEDED

**ATTACHMENT B**  
 Hazardous Air Pollutant (HAP) Emissions Log  
 Magellan Pipeline Company L.P.

Month / Year	Equipment Name / (EP/EU ID)	Material Handled	Amount (gallons)	HAP1 (Name) Emissions (tons)	HAP2 (Name) Emissions (tons)	HAP3 (Name) Emissions (tons)	HAP4 (Name) Emissions (tons)	Total HAP Emissions (tons)
	<sup>1</sup>							
	Monthly Total:							
	12-Month Rolling Total:							
	Monthly Total:							
	12-Month Rolling Total:							
	Monthly Total:							
	12-Month Rolling Total:							

<sup>1</sup> NOTE: All facility HAP emissions, including fugitive emissions associated with valves, pump seals, and other fittings, connectors, flanges, and sample points, must be counted in the totals.

DUPLICATE THIS FORM AS NEEDED

**ATTACHMENT C**  
 Leak Inspection Log Sheet

Date of Inspection	Equipment <sup>1</sup> Name (Emission Point #)	Leak Detected?	Method of Detection?	Location of Leak	Description of Leak	List each date a repair was attempted <sup>2</sup>	Comments / Reason Repair Was Not Completed Within 15 Days	Date the repair was completed OR the target date <sup>3</sup>
		(None / Liquid / Vapor / Both)	(Sight/Sound/ Smell)					
		(None / Liquid / Vapor / Both)	(Sight/Sound/ Smell)					
		(None / Liquid / Vapor / Both)	(Sight/Sound/ Smell)					
		(None / Liquid / Vapor / Both)	(Sight/Sound/ Smell)					
		(None / Liquid / Vapor / Both)	(Sight/Sound/ Smell)					
		(None / Liquid / Vapor / Both)	(Sight/Sound/ Smell)					
		(None / Liquid / Vapor / Both)	(Sight/Sound/ Smell)					
		(None / Liquid / Vapor / Both)	(Sight/Sound/ Smell)					
		(None / Liquid / Vapor / Both)	(Sight/Sound/ Smell)					
		(None / Liquid / Vapor / Both)	(Sight/Sound/ Smell)					
		(None / Liquid / Vapor / Both)	(Sight/Sound/ Smell)					

<sup>1</sup> Equipment means each valve, pump, pressure relief device, sampling connection system, open-ended valve or line, and flange or other connector in the gasoline liquid transfer and vapor collection systems. This definition also includes the entire vapor processing system except the exhaust port(s) or stack(s).

<sup>2</sup> A full description of the repair(s) made and corrective action taken is to be documented on the Maintenance and Repair Log (Attachment D)

<sup>3</sup> Enter the targeted completion date for any repair that has not been completed within 15 days of detection. The date that the repair was finally completed should be documented on the Maintenance and Repair Log (Attachment D).

Inspected By \_\_\_\_\_

Signature of Owner / Operator \_\_\_\_\_

DUPLICATE THIS FORM AS NEEDED





# 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.

## **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 October 30, 2006;
- 2) 2007 Emissions Inventory Questionnaire, received May 29, 2008;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) U.S. EPA, *Protocol for Equipment Leak Emission Estimates*, EPA-453/R-95-017, November 1995; and
- 5) American Petroleum Institute (API), *Compilation of Air Emission Factors for Petroleum Distribution and Retail Marketing Facilities*, Publication 1673, May 1998.

## **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.

40 CFR Part 63 Subpart BBBBBB, *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities*

- 1) This rule was not promulgated at the time the permit application was submitted. The rule applies to area source gasoline distribution bulk terminals, bulk plants, and pipeline facilities. The installation is subject to this rule; the compliance date is January 10, 2011.

## **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 10-6.100, *Alternate Emission Limits*

- 1) This rule does not apply because the installation is in an ozone attainment area. [10 CSR 10-6.100(1)(A)]

### **Construction Permit Revisions**

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

- 1) Missouri Department of Natural Resources Construction Permit #0594-007 authorized the replacement of an existing 2-spot top-loading rack with a new 2-spot bottom-loading rack and upgrading an existing 2-spot bottom loading rack with new equipment.
  - a) Special Conditions 2 and 3 are regarding the performance tests required by 40 CFR Part 60 subpart XX within 60 days after achieving the maximum production rate, but no later than 180 days after initial startup. These tests have been completed by the permittee; therefore, these special conditions are not included in the operating permit.
- 2) Missouri Department of Natural Resources Construction Permit #0595-005 and #0595-005A authorized the installation of Additive Storage Tank #131 (EU0120), a 1,000-gallon additive tank, and two 500-gallon additive tanks.
  - a) Special Condition 1 is included in the operating permit. There are no revisions to this construction permit.
- 3) Missouri Department of Natural Resources Construction Permit #0596-029 authorized the installation of a 1,000-gallon additive tank.
  - a) There are no special conditions or revisions to this construction permit.
- 4) Missouri Department of Natural Resources Construction Permit #0198-020 and #0198-020A authorized the installation of Storage Tank #1510 (EU0020), a 58,000-barrel gasoline storage tank, and Storage Tank #1511 (EU0110), a 55,000-barrel storage tank for jet kerosene or products having a lower volatility products.
  - a) In the *Review Summary* and *Applicable Rule* sections of this construction permit, 40 CFR Part 63 subpart R is listed as an applicable requirement. However, the EPA policy established in a May 16, 1995 memorandum, "Potential to Emit for MACT Standards-Guidance on Timing Issues," provides that a major source may become an area source by limiting its potential to emit HAP emissions to below major source levels (10 tpy or more of any individual HAP or 25 tpy or more of any combination of HAP), no later than the source's first substantive compliance date under an applicable MACT standard. The first substantive compliance date for subpart R was December 15, 1997. Since the facility became an area source prior to 1997, the facility is not subject to this rule.
  - b) There are no special conditions to this construction permit.

### **New Source Performance Standards (NSPS) Applicability**

- 1) 40 CFR Part 60 Subpart K, *Standards of Performance For Storage Vessels For Petroleum Liquids For Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior To May 19, 1978*
  - a) This rule does not apply because there are no storage vessels for petroleum liquids constructed after June 11, 1973 and prior to May 19, 1978 at the facility.
- 2) 40 CFR Part 60 Subpart Ka, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984*

- a) This rule does not apply because there are no storage vessels for petroleum liquids constructed after May 18, 1978 and prior to July 23, 1984 at the facility.
- 3) 40 CFR Part 60 Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*
  - a) This rule applies to Tank #1510 (EU0020).
  - b) This rule applies to Tank #1511 (EU0110). Because this tank stores distillate fuel oil #2, a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa), only the recordkeeping requirements in §63.116b(b) apply.
- 4) 40 CFR Part 60, Subpart XX, *Standards of Performance for Bulk Gasoline Terminals*
  - a) This rule applies to the Loading Rack (EU0010). This rule requires that the various records and notifications be kept for at least two (2) years. However, state operating permit regulations require records to be kept for a minimum of five (5) years.

#### **Maximum Available Control Technology (MACT) Applicability**

10 CSR 10-6.075, Maximum Achievable Control Technology Regulations

- 1) 40 CFR Part 63 Subpart R, *National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)*
  - a) This rule does not apply because the facility is not a major source (10 tpy or more of any individual HAP or 25 tpy or more of any combination of HAP). See further discussion under Construction Permit Revisions section.
- 2) 40 CFR Part 63 Subpart BBBB, *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities*
  - a) This rule applies to area source gasoline distribution bulk terminals, bulk plants, and pipeline facilities. The rule applies to this facility. The compliance date is January 10, 2011.

#### **National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

In the permit application and according to Air Pollution Control Program records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

## Other Regulatory Determinations

### 1) Calculations Related to Voluntary Conditions

The permittee has accepted the voluntary, federally enforceable emission limitations in Permit Condition PW001 of less than 100 tons of volatile organic compounds (VOC), less than 10 tons of any individual hazardous air pollutant (HAP) and less than 25 tons total of all HAP emissions from the entire installation in any consecutive 12-month period. The following calculations demonstrate that if all the emission unit specific throughput limitations are met, then Permit Condition PW001 will be met.

The calculations are in the following order:

Page SB-5	Annual VOC Emissions Summary
Page SB-5	Average Vapor Phase HAP Fractions of Gasoline Products
Page SB-6	Annual HAP Emissions Summary
Page SB-7	Annual VOC Fugitive Emissions from Gasoline/Distillate Loading at Loading Rack (EU0010)
Page SB-8	Annual VOC Controlled Emissions from Loading at Loading Rack (EU0010)
Page SB-8	Annual Facility-Wide Fugitive VOC Emissions from Seals, Valves, etc (EU0010)
Page SB-9	Annual VOC Emissions from Storage Tank #1510 (EU0020)
Page SB-10	Annual VOC Emissions from Storage Tank #4001 (EU0030)
Page SB-11	Annual VOC Emissions from Storage Tank #4002 (EU0040)
Page SB-12	Annual VOC Emissions from Storage Tank #4003 (EU0050)
Page SB-13	Annual VOC Emissions from Storage Tank #6017 (EU0060)
Page SB-15	Annual VOC Emissions from Storage Tank #121 (EU0070)
Page SB-16	Annual VOC Emissions from Storage Tank #122 (EU0080)
Page SB-18	Annual VOC Emissions from Storage Tank #796 (EU0090)
Page SB-19	Annual VOC Emissions from Storage Tank #6016 (EU0100)
Page SB-20	Annual VOC Emissions from Storage Tank #1511 (EU0110)
Page SB-21	VOC Emissions from Additive Storage Tanks
Page SB-22	Annual VOC Emissions from Additive Storage Tank #131 (EU0120)
Page SB-23	Annual VOC Emissions from Additive Storage Tank #110
Page SB-24	Annual VOC Emissions from Additive Storage Tank #130
Page SB-25	Annual VOC Emissions from Additive Storage Tank #133
Page SB-26	Annual VOC Emissions from Additive Storage Tank #70
Page SB-27	Annual VOC Emissions from Additive Storage Tank #120
Page SB-28	Annual VOC Emissions from Additive Storage Tank #137
Page SB-29	Annual VOC Emissions from Additive Storage Tank #160
Page SB-30	Annual VOC Emissions from Tank Roof Landings
Page SB-34	Annual VOC Emissions from Ethanol Unloading Skid

### Annual VOC Emissions Summary

The table below shows that the permittee will emit less than 100 tons of volatile organic compounds (VOC) from the entire installation in any consecutive 12-month period provided that the facility is in compliance with all emission unit-specific emission limitations in the permit.

EU ID #	Emission Unit Description	VOC ton/yr
EU0010	Loading Rack (Gasoline) Fugitives	13.66
	Loading Rack (Distillate) Fugitives	1.13
	Loading Rack (Gasoline) Controlled	56.23
	Components Fugitive	0.62
EU0020 - EU0110	Petroleum Products Storage Tanks Working and Standing Losses	23.38
EU0020 - EU0060	Gasoline Storage Tanks Roof Landings	2.70
EU0120	Additive Storage Tank #131 Working and Standing Losses	0.02
NA	Additional Additive Storage Tanks Working and Standing Losses	0.79
NA	Ethanol Unloading Skid Fugitives	0.12
<b>Total Annual VOC Emissions</b>		<b>98.66</b>

### Average Vapor Phase HAP Fractions of Gasoline Products

The following data was used to speciate the VOC emitted from gasoline product handling and storage into hazardous air pollutants (HAP). The HAP emissions were calculated based on the premise that all VOC emissions are gasoline.

Compound	% Weight of Compound In Vapor
Benzene	0.9
Ethylbenzene	0.1
Hexane	1.6
Toluene	1.3
2,2,4,Trimethylpentane	0.8
Xylenes	0.5

Note: Percentage weights from Table 3-2 of American Petroleum Institute (API), *Compilation of Air Emission Factors for Petroleum Distribution and Retail Marketing Facilities*, Publication 1673, May 1998

### Annual HAP Emissions Summary

The table below shows that the permittee will emit less than 10 tons of any individual hazardous air pollutant (HAP) and less than 25 tons of combined hazardous air pollutants (HAP) from the entire installation in any consecutive 12-month period provided that the facility is in compliance with all emission unit-specific emission limitations in the permit.

The HAP emissions were calculated based on the premise that all VOC emissions are gasoline.

EU ID #	VOC tpy	% Wgt HAP						HAP Emissions (ton/yr)						
		% Benzene	% Ethylbenzene	% Hexane	% Toluene	% 2,2,4 - Trimethylpentane	% Xylenes	Benzene	Ethylbenzene	Hexane	Toluene	% 2,2,4 - Trimethylpentane	% Xylenes	Total HAP
EU0010	71.64	0.90	0.10	1.60	0.30	0.80	0.50	0.6448	0.0716	1.1463	0.2149	0.5731	0.3582	3.01
EU0020	4.14	0.90	0.10	1.60	0.30	0.80	0.50	0.0372	0.0041	0.0662	0.0124	0.0331	0.0207	0.17
EU0030	4.26	0.90	0.10	1.60	0.30	0.80	0.50	0.0383	0.0043	0.0681	0.0128	0.0341	0.0213	0.18
EU0040	4.26	0.90	0.10	1.60	0.30	0.80	0.50	0.0383	0.0043	0.0681	0.0128	0.0341	0.0213	0.18
EU0050	4.26	0.90	0.10	1.60	0.30	0.80	0.50	0.0383	0.0043	0.0681	0.0128	0.0341	0.0213	0.18
EU0060	4.13	0.90	0.10	1.60	0.30	0.80	0.50	0.0372	0.0041	0.0661	0.0124	0.0330	0.0207	0.17
EU0070	1.65	0.90	0.10	1.60	0.30	0.80	0.50	0.0148	0.0016	0.0264	0.0049	0.0132	0.0082	0.07
EU0080	1.19	0.90	0.10	1.60	0.30	0.80	0.50	0.0107	0.0012	0.0190	0.0036	0.0095	0.0059	0.05
EU0090	0.61	0.90	0.10	1.60	0.30	0.80	0.50	0.0055	0.0006	0.0098	0.0018	0.0049	0.0031	0.03
EU0100	0.40	0.90	0.10	1.60	0.30	0.80	0.50	0.0036	0.0004	0.0064	0.0012	0.0032	0.0020	0.02
EU0110	1.19	0.90	0.10	1.60	0.30	0.80	0.50	0.0107	0.0012	0.0190	0.0036	0.0095	0.0060	0.05
EU0120	0.30	0.90	0.10	1.60	0.30	0.80	0.50	0.0027	0.0003	0.0048	0.0009	0.0024	0.0015	0.01
Tank #110	0.30	0.90	0.10	1.60	0.30	0.80	0.50	0.0027	0.0003	0.0048	0.0009	0.0024	0.0015	0.01
Tank #130	0.01	0.90	0.10	1.60	0.30	0.80	0.50	0.0001	0.0000	0.0002	0.0000	0.0001	0.0001	0.00
Tank #133	0.07	0.90	0.10	1.60	0.30	0.80	0.50	0.0006	0.0001	0.0011	0.0002	0.0005	0.0003	0.00
Tank #70	0.03	0.90	0.10	1.60	0.30	0.80	0.50	0.0003	0.0000	0.0005	0.0001	0.0003	0.0002	0.00
Tank #120	0.02	0.90	0.10	1.60	0.30	0.80	0.50	0.0002	0.0000	0.0003	0.0001	0.0001	0.0001	0.00
Tank #137	0.01	0.90	0.10	1.60	0.30	0.80	0.50	0.0001	0.0000	0.0001	0.0000	0.0001	0.0000	0.00
Tank #160	0.07	0.90	0.10	1.60	0.30	0.80	0.50	0.0006	0.0001	0.0011	0.0002	0.0006	0.0004	0.00
Ethanol Skid	0.12	0.90	0.10	1.60	0.30	0.80	0.50	0.0011	0.0001	0.0020	0.0004	0.0010	0.0006	0.01
<b>Totals</b>	<b>98.66</b>							<b>0.89</b>	<b>0.10</b>	<b>1.58</b>	<b>0.30</b>	<b>0.79</b>	<b>0.49</b>	<b>4.14</b>

**Annual VOC Fugitive Emissions from Gasoline and Distillate Loading at Loading Rack (EU0010)**

**Fugitive VOC Emissions**

According to 40 CFR §80.27(a)(2) during the regulatory control periods (May 1 to September 15), no refiner, importer, distributor, reseller, or carrier shall sell, offer for sale, dispense, supply, offer for supply, transport or introduce into commerce gasoline whose Reid vapor pressure exceeds 9.0 psi for all designated volatility attainment areas. Assuming 138 days (May 1 through June 15) at RVP 9 and 227 days (June 16 through April 30) at RVP 13, the average annual RVP of gasoline would be 11.5 psi. Therefore, the annual fugitive emissions were determined using the chemical data for RVP 11.5 gasoline.

The equations below are from Chapter 5.2 Transportation and Marketing of Petroleum Liquids in the US EPA document AP-42

$$L_L = 12.46 \frac{SPM}{T}$$

Where:

- $L_L$  = loading loss in pounds per 1000 gallons (lb/10<sup>3</sup> gal) of liquid loaded
- $S$  = a saturation factor, assumed 0.6 for submerged loading, dedicated normal service (EPA document AP-42, Table 5.2-1)
- $P$  = true vapor pressure of liquid loaded in pounds per square inch absolute (psia) (EPA program TANKS 4.09d)
- $M$  = molecular weight of vapors in pounds per pound-mole (lb/lb-mole) (EPA program TANKS 4.09d), and
- $T$  = temperature of bulk liquid loaded in °R (°F + 460)

Product	P (psia)	M (lb/lb-mole)	T °R	$L_L$ (lb/10 <sup>3</sup> gal)
Gasoline (RVP 11.5)	5.795	65	515.81	5.46
Distillate Oil #2	0.0060	130	515.81	0.011

$$E = L_L Q$$

Where:

- $E$  = total vapor generated, in pounds (lb),
- $L_L$  = loading loss in pounds per 1000 gallons (lb/10<sup>3</sup> gal) of liquid loaded, and
- $Q$  = total amount of liquid loaded, in thousands of gallons (10<sup>3</sup> gal)

Product	$L_L$ (lb/10 <sup>3</sup> gal)	$Q$ (10 <sup>3</sup> gal)	$E$ (lb/yr)	$E$ (tpy)
Gasoline (RVP 11.5)	5.46	385,000	2,101,876	1,050.94
Distillate Oil #2	0.011	200,000	2,261	1.13

$$L_F = E (1-EF)$$

Where:

- $L_F$  = fugitive losses from loading rack,
- $E$  = total vapor generated, and
- $EF$  = emission factor, 98.7% (operating permit application, vapor combustor capture efficiency)

Product	$E$ (tpy)	(1-EF)	$L_F$ (tpy)
Gasoline (RVP 11.5)	1050.94	98.7%	13.66
Distillate Oil #2	1.13	NA	1.13

**Annual VOC Controlled Emissions from Gasoline Loading at Loading Rack (EU0010)**

**Controlled VOC Emissions**

As a worst-case scenario, assume that the maximum allowable emission of 35 milligrams of total organic compounds (VOC) per liter of gasoline loaded at the facility.

Total throughput = 385,000,000 gal/yr gasoline  
 Allowable Emissions = 35 mg/liter

Annual VOC = Q Emission Rate  
 = (385,000,000 gal/yr) x (35 mg/l) x (lb/0.4536 kg) x (kg/10<sup>6</sup> mg) x (3.7854 l/gal) x (ton/2000 lb)  
 = 56.23 tpy

**Annual Facility-Wide Fugitive VOC Emissions from Seals, Valves, etc (EU0010)**

Information from the application on the number of pump seals, flange sets, valves, open-ended lines, and sumps was used to determine emissions.

Component	Number at Facility	VOC Emission Factor (lb/component-hr)	Hrs in Service	VOC (lb/yr)	VOC (tpy)
Pump Seals	19	0.0011907	8760	198.180	0.099
Flange Sets (2" & larger)	1272	0.00001764	8760	196.558	0.098
Loading Rack Valves (vapor lines) (2" & larger)	4	0.0014	8760	49.056	0.025
Loading Rack Valves (liquid) (2" & larger)	67	0.00087	8760	510.620	0.255
Other Valves (2" & larger)	279	0.0000948	8760	231.695	0.116
Open Ended Lines (gas)	1	0.0067	8760	58.692	0.029
Sumps	0	0.083	8760	0.000	0.000
<b>Totals</b>				<b>1244.801</b>	<b>0.622</b>

Notes: VOC emission factors from US EPA, *Protocol for Equipment Leak Emission Estimates*, EPA-453/R-95-017, November 1995

**Annual VOC Emissions from Storage Tank #1510 (EU0020)**

The calculations were completed with the TANKS 4.09d software provided by the U.S. EPA.

**Tank Identification and Physical Characteristics**

<b>Identification</b>	User Identification:	Springfield 1510 - PTE
	City:	Springfield
	State:	Missouri
	Company:	Magellan Pipeline Company
	Type of Tank:	Internal Floating Roof Tank
	Description:	Gasoline (RVP 11.5)
<b>Tank Dimensions</b>	Diameter (ft):	96.00
	Volume (gallons):	2,327,346.00
	Turnovers:	104.00
	Self Supp. Roof? (y/n):	N
	No. of Columns:	6.00
	Eff. Col. Diam. (ft):	1.00
<b>Paint Characteristics</b>	Internal Shell Condition:	Light Rust
	Shell Color/Shade:	White/White
	Shell Condition:	Good
	Roof Color/Shade:	White/White
	Roof Condition:	Good
<b>Rim-Seal System</b>	Primary Seal:	Mechanical Shoe
	Secondary Seal:	Rim-mounted
<b>Deck Characteristics</b>	Deck Fitting Category:	Typical
	Deck Type:	Welded

<b>Deck Fitting/Status</b>	<b>Quantity</b>
Access Hatch (24-in. Diam.)/Unbolted Cover, Ungasketed	1
Automatic Gauge Float Well/Unbolted Cover, Ungasketed	1
Column Well (24-in. Diam.)/Built-Up Col.-Sliding Cover, Ungask.	6
Ladder Well (36-in. Diam.)/Sliding Cover, Ungasketed	1
Roof Leg or Hanger Well/Adjustable	30
Sample Pipe or Well (24-in. Diam.)/Slit Fabric Seal 10% Open	1
Vacuum Breaker (10-in. Diam.)/Weighted Mech. Actuation, Gask.	1
Meteorological Data: Springfield, Missouri (Avg Atmospheric Pressure = 14.09 psia)	

**Liquid Contents of Storage Tank**

Mixture/ Component	Daily Liquid Surface Temperature (° F)			Liquid Bulk Temp (°F)	Vapor Pressure (psia)			Vapor Mol Wgt	Liquid Mass Fract	Vapor Mass Fract	Mol Wgt	Basis for Vapor Pressure Calculation
	Avg	Min	Max		Avg	Min	Max					
Gasoline (RVP 11.5)	57.66	51.98	63.34	55.81	5.7950	N/A	N/A	65			92	Option 4: RVP=11.5 ASTM Slope=3

**Emissions Report for: Annual**

Components	Losses (lbs)				
	Rim Seal Loss	Withdrawal Loss	Deck Fitting Loss	Deck Seam Loss	Total Emissions
Gasoline (RVP 11.5)	492.84	505.24	5,674.51	0.00	6,672.59

**Annual VOC Emissions from Storage Tank #4001 (EU0030)**

The VOC calculations were completed with the TANKS 4.09d software provided by the U.S. EPA.

**Tank Identification and Physical Characteristics**

<b>Identification</b>	User Identification:	Springfield 4001 - PTE
	City:	Springfield
<b>Tank Dimensions</b>	State:	Missouri
	Company:	Magellan Pipeline Company
	Type of Tank:	Internal Floating Roof Tank
	Description:	Gasoline (RVP 11.5)
	Diameter (ft):	78.00
	Volume (gallons):	1,562,106.00
	Turnovers:	104.00
	Self Supp. Roof? (y/n):	N
	No. of Columns:	1.00
	Eff. Col. Diam. (ft):	1.00
<b>Paint Characteristics</b>	Internal Shell Condition:	Light Rust
	Shell Color/Shade:	White/White
	Shell Condition:	Good
	Roof Color/Shade:	White/White
<b>Rim-Seal System</b>	Roof Condition:	Good
	Primary Seal:	Mechanical Shoe
<b>Deck Characteristics</b>	Secondary Seal:	None
	Deck Fitting Category:	Typical
	Deck Type:	Welded

<b>Deck Fitting/Status</b>	<b>Quantity</b>
Access Hatch (24-in. Diam.)/Unbolted Cover, Ungasketed	1
Automatic Gauge Float Well/Unbolted Cover, Ungasketed	1
Column Well (24-in. Diam.)/Built-Up Col.-Sliding Cover, Ungask.	1
Ladder Well (36-in. Diam.)/Sliding Cover, Ungasketed	1
Roof Leg or Hanger Well/Adjustable	23
Sample Pipe or Well (24-in. Diam.)/Slit Fabric Seal 10% Open	1
Vacuum Breaker (10-in. Diam.)/Weighted Mech. Actuation, Gask.	1
Meteorological Data: Springfield, Missouri (Avg Atmospheric Pressure = 14.09 psia)	

**Liquid Contents of Storage Tank**

Mixture/ Component	Daily Liquid Surface Temperature (° F)			Liquid Bulk Temp (°F)	Vapor Pressure (psia)			Vapor Mol Wgt	Liquid Mass Fract	Vapor Mass Fract	Mol Wgt	Basis for Vapor Pressure Calculation
	Avg	Min	Max		Avg	Min	Max					
Gasoline (RVP 11.5)	57.66	51.98	63.34	55.81	5.7950	N/A	N/A	65			92	Option 4: RVP=11.5 ASTM Slope=3

**Emissions Report for: Annual**

Components	Losses (lbs)				
	Rim Seal Loss	Withdrawal Loss	Deck Fitting Loss	Deck Seam Loss	Total Emissions
Gasoline (RVP 11.5)	3,870.85	397.85	3,190.63	0.00	7,459.34

**Annual VOC Emissions from Storage Tank #4002 (EU0040)**

The VOC calculations were completed with the TANKS 4.09d software provided by the U.S. EPA.

**Tank Identification and Physical Characteristics**

<b>Identification</b>	User Identification:	Springfield 4002 - PTE
	City:	Springfield
	State:	Missouri
	Company:	Magellan Pipeline Company
	Type of Tank:	Internal Floating Roof Tank
	Description:	Gasoline (RVP 11.5)
<b>Tank Dimensions</b>	Diameter (ft):	78.00
	Volume (gallons):	1,561,854.00
	Turnovers:	104.02
	Self Supp. Roof? (y/n):	N
	No. of Columns:	1.00
	Eff. Col. Diam. (ft):	1.00
<b>Paint Characteristics</b>	Internal Shell Condition:	Light Rust
	Shell Color/Shade:	White/White
	Shell Condition:	Good
	Roof Color/Shade:	White/White
	Roof Condition:	Good
<b>Rim-Seal System</b>	Primary Seal:	Mechanical Shoe
	Secondary Seal:	None
<b>Deck Characteristics</b>	Deck Fitting Category:	Typical
	Deck Type:	Welded

<b>Deck Fitting/Status</b>	<b>Quantity</b>
Access Hatch (24-in. Diam.)/Unbolted Cover, Ungasketed	1
Automatic Gauge Float Well/Unbolted Cover, Ungasketed	1
Column Well (24-in. Diam.)/Built-Up Col.-Sliding Cover, Ungask.	1
Ladder Well (36-in. Diam.)/Sliding Cover, Ungasketed	1
Roof Leg or Hanger Well/Adjustable	23
Sample Pipe or Well (24-in. Diam.)/Slit Fabric Seal 10% Open	1
Vacuum Breaker (10-in. Diam.)/Weighted Mech. Actuation, Gask.	1
Meteorological Data: Springfield, Missouri (Avg Atmospheric Pressure = 14.09 psia)	

**Liquid Contents of Storage Tank**

Mixture/ Component	Daily Liquid Surface Temperature (° F)			Liquid Bulk Temp (°F)	Vapor Pressure (psia)			Vapor Mol Wgt	Liquid Mass Fract	Vapor Mass Fract	Mol Wgt	Basis for Vapor Pressure Calculation
	Avg	Min	Max		Avg	Min	Max					
Gasoline (RVP 11.5)	57.66	51.98	63.34	55.81	5.7950	N/A	N/A	65			92	Option 4: RVP=11.5 ASTM Slope=3

**Emissions Report for: Annual**

Components	Losses (lbs)				
	Rim Seal Loss	Withdrawal Loss	Deck Fitting Loss	Deck Seam Loss	Total Emissions
Gasoline (RVP 11.5)	3,870.85	397.85	3,190.63	0.00	7,459.34

**Annual VOC Emissions from Storage Tank #4003 (EU0050)**

The VOC calculations were completed with the TANKS 4.09d software provided by the US EPA.

**Tank Identification and Physical Characteristics**

<b>Identification</b>	User Identification:	Springfield 4003 - PTE
	City:	Springfield
<b>Tank Dimensions</b>	State:	Missouri
	Company:	Magellan Pipeline Company
	Type of Tank:	Internal Floating Roof Tank
	Description:	Gasoline (RVP 11.5)
	Diameter (ft):	78.00
	Volume (gallons):	1,561,980.00
	Turnovers:	104.01
	Self Supp. Roof? (y/n):	N
	No. of Columns:	1.00
	Eff. Col. Diam. (ft):	1.00
<b>Paint Characteristics</b>	Internal Shell Condition:	Light Rust
	Shell Color/Shade:	White/White
	Shell Condition:	Good
	Roof Color/Shade:	White/White
<b>Rim-Seal System</b>	Roof Condition:	Good
	Primary Seal:	Mechanical Shoe
<b>Deck Characteristics</b>	Secondary Seal:	None
	Deck Fitting Category:	Typical
	Deck Type:	Welded

<b>Deck Fitting/Status</b>	<b>Quantity</b>
Access Hatch (24-in. Diam.)/Unbolted Cover, Ungasketed	1
Automatic Gauge Float Well/Unbolted Cover, Ungasketed	1
Column Well (24-in. Diam.)/Built-Up Col.-Sliding Cover, Ungask.	1
Ladder Well (36-in. Diam.)/Sliding Cover, Ungasketed	1
Roof Leg or Hanger Well/Adjustable	23
Sample Pipe or Well (24-in. Diam.)/Slit Fabric Seal 10% Open	1
Vacuum Breaker (10-in. Diam.)/Weighted Mech. Actuation, Gask.	1
Meteorological Data: Springfield, Missouri (Avg Atmospheric Pressure = 14.09 psia)	

**Liquid Contents of Storage Tank**

Mixture/ Component	Daily Liquid Surface Temperature (° F)			Liquid Bulk Temp (°F)	Vapor Pressure (psia)			Vapor Mol Wgt	Liquid Mass Fract	Vapor Mass Fract	Mol Wgt	Basis for Vapor Pressure Calculation
	Avg	Min	Max		Avg	Min	Max					
Gasoline (RVP 11.5)	57.66	51.98	63.34	55.81	5.7950	N/A	N/A	65			92	Option 4: RVP=11.5 ASTM Slope=3

**Emissions Report for: Annual**

Components	Losses (lbs)				
	Rim Seal Loss	Withdrawal Loss	Deck Fitting Loss	Deck Seam Loss	Total Emissions
Gasoline (RVP 11.5)	3,870.85	397.85	3,190.63	0.00	7,459.34

**Annual VOC Emissions from Storage Tank #6017 (EU0060)**

The VOC calculations were completed with the TANKS 4.09d software provided by the U.S. EPA.

**Tank Identification and Physical Characteristics**

<b>Identification</b>	User Identification:	Springfield 6017 - PTE
	City:	Springfield
	State:	Missouri
	Company:	Magellan Pipeline Company
	Type of Tank:	Internal Floating Roof Tank
	Description:	Gasoline (RVP 11.5)
<b>Tank Dimensions</b>	Diameter (ft):	60.00
	Volume (gallons):	753,648.00
	Turnovers:	104.00
	Self Supp. Roof? (y/n):	N
	No. of Columns:	1.00
	Eff. Col. Diam. (ft):	1.00
<b>Paint Characteristics</b>	Internal Shell Condition:	Light Rust
	Shell Color/Shade:	White/White
	Shell Condition	Good
	Roof Color/Shade:	White/White
<b>Rim-Seal System</b>	Roof Condition:	Good
	Primary Seal:	Vapor-mounted
	Secondary Seal	None
<b>Deck Characteristics</b>	Deck Fitting Category:	Typical
	Deck Type:	Bolted
	Construction:	Sheet
	Deck Seam:	Sheet: 5 Ft Wide
	Deck Seam Len. (ft):	565.49

<b>Deck Fitting/Status</b>	<b>Quantity</b>
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Access Hatch (24-in. Diam.)/Unbolted Cover, Ungasketed	1
Automatic Gauge Float Well/Unbolted Cover, Ungasketed	1
Column Well (24-in. Diam.)/Built-Up Col.-Sliding Cover, Ungask.	1
Ladder Well (36-in. Diam.)/Sliding Cover, Ungasketed	1
Roof Leg or Hanger Well/Adjustable	17
Sample Pipe or Well (24-in. Diam.)/Slit Fabric Seal 10% Open	1
Stub Drain (1-in. Diameter)/Slit Fabric Seal 10% Open	29
Vacuum Breaker (10-in. Diam.)/Weighted Mech. Actuation, Gask.	1

Meteorological Data used in Emissions Calculations: Springfield, Missouri  
 (Avg Atmospheric Pressure = 14.09 psia)

**Liquid Contents of Storage Tank**

Mixture/ Component	Daily Liquid Surface Temperature (° F)			Liquid Bulk Temp (°F)	Vapor Pressure (psia)			Vapor Mol Wgt	Liquid Mass Fract	Vapor Mass Fract	Mol Wgt	Basis for Vapor Pressure Calculation
	Avg	Min	Max		Avg	Min	Max					
Gasoline (RVP 11.5)	57.66	51.98	63.34	55.81	5.7950	N/A	N/A	65			92	Option 4: RVP=11.5 ASTM Slope=3

**Emissions Report for: Annual**

Components	Losses (lbs)				
	Rim Seal Loss	Withdrawal Loss	Deck Fitting Loss	Deck Seam Loss	Total Emissions
Gasoline (RVP 11.5)	3,439.62	250.48	3,082.82	862.48	7,635.40

**Annual VOC Emissions from Storage Tank #121 (EU0070)**

The VOC calculations were completed with the TANKS 4.09d software provided by the US EPA.

**Tank Identification and Physical Characteristics**

<b>Identification</b>	User Identification:	Springfield 121 - PTE
	City:	Springfield
	State:	Missouri
	Company:	Magellan Pipeline Company
	Type of Tank:	Vertical Fixed Roof Tank
	Description:	60% gasoline/40% distillate
<b>Tank Dimensions</b>	Shell Height (ft):	15.00
	Diameter (ft):	22.00
	Liquid Height (ft):	12.00
	Avg. Liquid Height (ft):	7.00
	Volume (gallons):	32,550.00
	Turnovers:	2.00
	Net Throughput (gal/yr):	65,100.00
	Is Tank Heated (y/n):	N
<b>Paint Characteristics</b>	Shell Color/Shade:	White/White
	Shell Condition:	Good
	Roof Color/Shade:	White/White
	Roof Condition:	Good
<b>Roof Characteristics</b>	Type:	Cone
	Height (ft):	0.00
	Slope (ft/ft) (Cone Roof):	0.06
<b>Breather Vent Settings</b>	Vacuum Settings (psig):	0.00
	Pressure Settings (psig):	0.00

Meteorological Data: Springfield, Missouri (Avg Atmospheric Pressure = 14.09 psia)

**Liquid Contents of Storage Tank**

Mixture/ Component	Daily Liquid Surface Temperature (° F)			Liq Bulk Temp (°F)	Vapor Pressure (psia)			Vapor Mol Wgt	Liq Mass Fract	Vap Mass Fract	Mol Wgt	Basis for Vapor Pressure Calcula- tion
	Avg	Min	Max		Avg	Min	Max					
60% gasoline/ 40% distillate	57.66	51.98	63.34	55.81	4.3710	3.9148	4.8686	65.0221			115.61	

Mixture/ Component	Daily Liquid Surface Temperature (° F)			Liq Bulk Temp  (°F)	Vapor Pressure (psia)			Vapor Mol Wgt	Liq Mass Fract	Vap Mass Fract	Mol Wgt	Basis for Vapor Pressure Calcula- tion
	Avg	Min	Max		Avg	Min	Max					
Distillate oil #2					0.0060	0.0049	0.0073	130	0.400	0.0007	188	Option 1: VP50= .0045 VP60= .0065
Gasoline (RVP 11.5)					5.7950	5.1904	6.4545	65	0.600	0.9993	92	Option 4: RVP= 11.5, ASTM Slope = 3

**Emissions Report for: Annual**

Components	Losses (lbs)		
	Working Loss	Breathing Loss	Total Emissions
60% gasoline /40% distillate	440.52	2,855.10	3,295.63
Distillate fuel oil no. 2	0.30	1.94	2.24
Gasoline (RVP 11.5)	440.23	2853.17	3,293.39

**Annual VOC Emissions from Storage Tank #122 (EU0080)**

The VOC calculations were completed with the TANKS 4.09d software provided by the U.S. EPA.

**Tank Identification and Physical Characteristics**

<b>Identification</b>	User Identification:	Springfield 122 - PTE
	City:	Springfield
	State:	Missouri
	Company:	Magellan Pipeline Company
	Type of Tank:	Vertical Fixed Roof Tank
	Description:	60% distillate/40% gasoline
<b>Tank Dimensions</b>	Shell Height (ft):	15.00
	Diameter (ft):	22.00
	Liquid Height (ft):	12.00
	Avg. Liquid Height (ft):	7.00
	Volume (gallons):	32,508.00
	Turnovers:	2.00
	Net Throughput (gal/yr):	65,100.00
	Is Tank Heated (y/n):	N
<b>Paint Characteristics</b>	Shell Color/Shade:	White/White
	Shell Condition	Good
	Roof Color/Shade:	White/White
	Roof Condition:	Good
<b>Roof Characteristics</b>	Type:	Cone
	Height (ft)	0.00
	Slope (ft/ft) (Cone Roof)	0.06
<b>Breather Vent Settings</b>	Vacuum Settings (psig):	0.00
	Pressure Settings (psig)	0.00

Meteorological Data: Springfield, Missouri (Avg Atmospheric Pressure = 14.09 psia)

**Liquid Contents of Storage Tank**

Mixture/ Component	Daily Liquid Surface Temperature (° F)			Liq Bulk Temp (°F)	Vapor Pressure (psia)			Vapor Mol Wgt	Liq Mass Fract	Vap Mass Fract	Mol Wgt	Basis for Vapor Pressure Calcula- tion
	Avg	Min	Max		Avg	Min	Max					
60% distillate 40% gasoline	57.66	51.98	63.34	55.81	3.3444	2.9953	3.7253	65.0496			132.64	
Distillate oil #2					0.0060	0.0049	0.0073	130	0.600	0.0015	188	Option 1: VP50= .0045 VP60= .0065
Gasoline (RVP 11.5)					5.7950	5.1904	6.4545	65	0.400	0.9985	92	Option 4: RVP= 11.5, ASTM Slope = 3

**Emissions Report for: Annual**

Components	Losses (lbs)		
	Working Loss	Breathing Loss	Total Emissions
60% distillate /40% gasoline	337.21	2,034.32	2,371.53
Distillate fuel oil no. 2	0.51	3.10	3.62
Gasoline (RVP 11.5)	336.70	2,031.21	2,368.83

**Annual VOC Emissions from Storage Tank #796 (EU0090)**

The VOC calculations were completed with the TANKS 4.09d software provided by the U.S. EPA.

**Tank Identification and Physical Characteristics**

<b>Identification</b>	User Identification:	Springfield 796 - PTE
	City:	Springfield
	State:	Missouri
	Company:	Magellan Pipeline Company
	Type of Tank:	Vertical Fixed Roof Tank
<b>Tank Dimensions</b>	Description:	Distillate oil #2
	Shell Height (ft):	48.00
	Diameter (ft):	67.00
	Liquid Height (ft):	46.00
	Avg. Liquid Height (ft):	23.00
	Volume (gallons):	1,157,730.00
	Turnovers:	104.00
	Net Throughput (gal/yr):	120,403,920.00
	Is Tank Heated (y/n):	N
	<b>Paint Characteristics</b>	Shell Color/Shade:
Shell Condition:		Good
Roof Color/Shade:		White/White
Roof Condition:		Good
<b>Roof Characteristics</b>	Type:	Cone
	Height (ft):	0.00
	Slope (ft/ft) (Cone Roof):	0.06

**Breather Vent Settings** Vacuum Settings (psig): 0.00  
 Pressure Settings (psig) 0.00

Meteorological Data: Springfield, Missouri (Avg Atmospheric Pressure = 14.09 psia)

**Liquid Contents of Storage Tank**

Mixture/ Component	Daily Liquid Surface Temperature (° F)			Liq Bulk Temp (°F)	Vapor Pressure (psia)			Vap Mol Wgt	Liq Mass Fract	Vapor Mass Fract	Mol Wgt	Basis for Vapor Pressure Calculation
	Avg	Min	Max		Avg	Min	Max					
Distillate fuel oil no. 2	57.66	51.98	63.34	55.81	0.0060	0.0049	0.0073	130			188	Option 1: VP50 = .0045 VP60 = .0065

**Emissions Report for: Annual**

Components	Losses (lbs)		
	Working Loss	Breathing Loss	Total Emissions
Distillate oil #2	1,023.12	204.07	1,227.19

**Annual VOC Emissions from Storage Tank #6016 (EU0100)**

The VOC calculations were completed with the TANKS 4.09d software provided by the U.S. EPA.

**Tank Identification and Physical Characteristics**

**Identification** User Identification: Springfield 6016 - PTE  
 City: Springfield  
 State: Missouri  
 Company: Magellan Pipeline Company  
 Type of Tank: Vertical Fixed Roof Tank  
 Description: Distillate oil #2

**Tank Dimensions** Shell Height (ft): 40.00  
 Diameter (ft): 60.00  
 Liquid Height (ft): 38.00  
 Avg. Liquid Height (ft): 19.00  
 Volume (gallons): 754,530.00  
 Turnovers: 104.00  
 Net Throughput (gal/yr): 78,471,120.00  
 Is Tank Heated (y/n): N

**Paint Characteristics** Shell Color/Shade: White/White  
 Shell Condition: Good  
 Roof Color/Shade: White/White  
 Roof Condition: Good

**Roof Characteristics** Type: Cone  
 Height (ft): 0.00  
 Slope (ft/ft) (Cone Roof): 0.06

**Breather Vent Settings** Vacuum Settings (psig): 0.00  
 Pressure Settings (psig) 0.00

Meteorological Data: Springfield, Missouri (Avg Atmospheric Pressure = 14.09 psia)

**Liquid Contents of Storage Tank**

Mixture/ Component	Daily Liquid Surface Temperature (° F)			Liq Bulk Temp (°F)	Vapor Pressure (psia)			Vap Mol Wgt	Liq Mass Fract	Vapor Mass Fract	Mol Wgt	Basis for Vapor Pressure Calculation
	Avg	Min	Max		Avg	Min	Max					
Distillate fuel oil no. 2	57.66	51.98	63.34	55.81	0.0060	0.0049	0.0073	130			188	Option 1: VP50 = .0045 VP60 = .0065

**Emissions Report for: Annual**

Components	Losses (lbs)		
	Working Loss	Breathing Loss	Total Emissions
Distillate oil no. 2	666.80	138.05	804.85

**Annual VOC Emissions from Storage Tank #1511 (EU0110)**

The VOC calculations for were completed with the TANKS 4.09d software provided by the U.S. EPA.

**Tank Identification and Physical Characteristics**

<b>Identification</b>	User Identification:	Springfield 1511 - PTE
	City:	Springfield
	State:	Missouri
	Company:	Magellan Pipeline Company
	Type of Tank:	Vertical Fixed Roof Tank
	Description:	Distillate oil #2
<b>Tank Dimensions</b>	Shell Height (ft):	48.00
	Diameter (ft):	91.00
	Liquid Height (ft) :	46.00
	Avg. Liquid Height (ft):	23.00
	Volume (gallons):	2,278,878.00
	Turnovers:	104.00
	Net Throughput (gal/yr):	237,003,312.00
	Is Tank Heated (y/n):	N
<b>Paint Characteristics</b>	Shell Color/Shade:	White/White
	Shell Condition	Good
	Roof Color/Shade:	White/White
	Roof Condition:	Good
<b>Roof Characteristics</b>	Type:	Cone
	Height (ft)	0.00
	Slope (ft/ft) (Cone Roof)	0.00
<b>Breather Vent Settings</b>	Vacuum Settings (psig):	0.00
	Pressure Settings (psig)	0.0

Meteorological Data: Springfield, Missouri (Avg Atmospheric Pressure = 14.09 psia)

**Liquid Contents of Storage Tank**

Mixture/ Component	Daily Liquid Surface Temperature (° F)			Liq Bulk Temp (°F)	Vapor Pressure (psia)			Vap Mol Wgt	Liq Mass Fract	Vapor Mass Fract	Mol Wgt	Basis for Vapor Pressure Calculation
	Avg	Min	Max		Avg	Min	Max					
Distillate fuel oil no. 2	57.66	51.98	63.34	55.81	0.0060	0.0049	0.0073	130			188	Option 1: VP50 = .0045 VP60 = .0065

**Emissions Report for: Annual**

Components	Losses (lbs)		
	Working Loss	Breathing Loss	Total Emissions
Distillate oil no. 2	2,013.91	336.711	2,380.62

**VOC Emissions from Additive Storage Tanks**

Calculations of VOC emissions from the additive storage tanks were based on the throughput of the petroleum products loaded. Since additives are injected at the loading rack when petroleum products are loaded into tank trucks, the additive throughput is dependent and proportional to the throughput of the petroleum products loaded. For a worst-case scenario, the maximum injection rate was assumed to be 0.6 gallons of additive per thousand gallons of petroleum product or 10 turnovers per year per additive storage tank. This proportion was derived from conservatively tripling the proportion of additive throughput to the throughput of the petroleum products loaded in 2008:

- 1) Determine historical proportion of additive throughput to throughput of the petroleum products loaded

From Magellan Pipeline Company Transactions Records Report (1/1/08 through 12/31/08):

$$\frac{\text{gal Additive}}{1000 \text{ gal Petroleum Pr oduct}} = \left( \frac{87,806 \text{ gal additives}}{430,697 \text{ 1000 gal Petroleum Pr oduct}} \right) = \frac{0.2 \text{ gal Additive}}{1000 \text{ gal Petroleum Pr oduct}}$$

- 2) For a worst-case scenario, conservatively assume 3x's the additive ratio, i.e. assume 0.6 gallon of additive/1000 gal petroleum product:

$$\frac{0.6 \text{ gal Additive}}{1000 \text{ gal Petroleum Pr oduct}} \times (385,000 + 200,000 \text{ (1000 gal Petroleum Pr oduct)}) = 351,000 \text{ gal Additives}$$

- 3) Determine number of turnovers per additive tank per year

Total capacity of Additive Storage Tanks = 35,000-gallons

# of turnovers/year = 351,000 gallons/35,000 gallons = 10 turnovers/year

Compliance with the throughput limitations for petroleum products at the loading rack will result in compliance with the throughput limitations for additives.

**Annual VOC Emissions from Additive Storage Tank #131 (EU0120)**

The VOC calculations were completed with the TANKS 4.09d software provided by the U.S. EPA.

**Tank Identification and Physical Characteristics**

<b>Identification</b>	User Identification:	Springfield 131 - PTE
	City:	Springfield
	State:	Missouri
	Company:	Magellan Pipeline Company
	Type of Tank:	Vertical Fixed Roof Tank
	Description:	Additive tank: MPL CFI #228-131 (#5) Jet naphtha
<b>Tank Dimensions</b>	Shell Height (ft):	6.00
	Diameter (ft):	5.33
	Liquid Height (ft):	6.00
	Avg. Liquid Height (ft):	5.00
	Volume (gallons):	1,000.00
	Turnovers:	10.00
	Net Throughput (gal/yr):	10,000.00
	Is Tank Heated (y/n):	N
<b>Paint Characteristics</b>	Shell Color/Shade:	White/White
	Shell Condition	Good
	Roof Color/Shade:	White/White
	Roof Condition:	Good
<b>Roof Characteristics</b>	Type:	Dome
	Height (ft)	0.00
	Radius (ft) (Dome Roof)	5.33
<b>Breather Vent Settings</b>	Vacuum Settings (psig):	-0.03
	Pressure Settings (psig)	0.03

Meteorological Data: Springfield, Missouri (Avg Atmospheric Pressure = 14.09 psia)

**Liquid Contents of Storage Tank**

Mixture/ Component	Daily Liquid Surface Temperature (° F)			Liq Bulk Temp (°F)	Vapor Pressure (psia)			Vap Mol Wgt	Liq Mass Fract	Vapor Mass Fract	Mol Wgt	Basis for Vapor Pressure Calcula- tion
	Avg	Min	Max		Avg	Min	Max					
Jet naphtha (JP-4)	57.66	51.98	63.34	55.81	1.2298	1.0594	1.4002	80			120	Option 1: VP50 = 1 VP60 = 1.3

**Emissions Report for: Annual**

Components	Losses (lbs)		
	Working Loss	Breathing Loss	Total Emissions
Jet naphtha (JP-4)	23.42	11.90	35.32

**Annual VOC Emissions from Additive Storage Tank #110**

The VOC calculations were completed with the TANKS 4.09d software provided by the U.S. EPA.

**Tank Identification and Physical Characteristics**

<b>Identification</b>	User Identification:	Springfield 110 - PTE
	City:	Springfield
	State:	Missouri
	Company:	Magellan Pipeline Company
	Type of Tank:	Horizontal Tank
	Description:	Additive tank: Shell IVD #228-110 (#5) Jet naphtha
<b>Tank Dimensions</b>	Shell Length (ft):	20.00
	Diameter (ft):	10.00
	Volume (gallons):	12,000.00
	Turnovers:	10.00
	Net Throughput (gal/yr):	120,000.00
	Is Tank Heated (y/n)	N
	Is Tank Underground (y/n):	N
<b>Paint Characteristics</b>	Shell Color/Shade:	White/White
	Shell Condition	Good
<b>Breather Vent Settings</b>	Vacuum Settings (psig):	-0.03
	Pressure Settings (psig)	0.03

Meteorological Data: Springfield, Missouri (Avg Atmospheric Pressure = 14.09 psia)

**Liquid Contents of Storage Tank**

Mixture/ Component	Daily Liquid Surface Temperature (° F)			Liq Bulk Temp (°F)	Vapor Pressure (psia)			Vap Mol Wgt	Liq Mass Fract	Vapor Mass Fract	Mol Wgt	Basis for Vapor Pressure Calcula- tion
	Avg	Min	Max		Avg	Min	Max					
Jet naphtha (JP-4)	57.66	51.98	63.34	55.81	1.2298	1.0594	1.4002	80			120	Option 1: VP50 = 1 VP60 = 1.3

**Emissions Report for: Annual**

Components	Losses (lbs)		
	Working Loss	Breathing Loss	Total Emissions
Jet naphtha (JP-4)	281.10	320.94	602.03

**Annual VOC Emissions from Additive Storage Tank #130**

The VOC calculations were completed with the TANKS 4.09d software provided by the U.S. EPA.

**Tank Identification and Physical Characteristics**

<b>Identification</b>	User Identification:	Springfield 130 - PTE
	City:	Springfield
	State:	Missouri
	Company:	Magellan Pipeline Company
	Type of Tank:	Horizontal Tank
	Description:	Additive tank: MPL IVD #228-130 Jet naphtha
<b>Tank Dimensions</b>	Shell Length (ft):	20.00
	Diameter (ft):	10.00
	Volume (gallons):	12,000.00
	Turnovers:	10.00
	Net Throughput (gal/yr):	120,000.00
	Is Tank Heated (y/n):	N
	Is Tank Underground (y/n):	N
<b>Paint Characteristics</b>	Shell Color/Shade:	White/White
	Shell Condition	Good
<b>Breather Vent Settings</b>	Vacuum Settings (psig):	-0.03
	Pressure Settings (psig)	0.03

Meteorological Data: Springfield, Missouri (Avg Atmospheric Pressure = 14.09 psia)

**Liquid Contents of Storage Tank**

Mixture/ Component	Daily Liquid Surface Temperature (° F)			Liq Bulk Temp (°F)	Vapor Pressure (psia)			Vap Mol Wgt	Liq Mass Fract	Vapor Mass Fract	Mol Wgt	Basis for Vapor Pressure Calcula- tion
	Avg	Min	Max		Avg	Min	Max					
Jet naphtha (JP-4)	57.66	51.98	63.34	55.81	1.2298	1.0594	1.4002	80			120	Option 1: VP50 = 1 VP60 = 1.3

**Emissions Report for: Annual**

Components	Losses (lbs)		
	Working Loss	Breathing Loss	Total Emissions
Jet naphtha (JP-4)	281.10	320.94	602.03

**Annual VOC Emissions from Additive Storage Tank #133**

The VOC calculations were completed with the TANKS 4.09d software provided by the U.S. EPA.

**Tank Identification and Physical Characteristics**

<b>Identification</b>	User Identification:	Springfield 133 - PTE
	City:	Springfield
	State:	Missouri
	Company:	Magellan Pipeline Company
	Type of Tank:	Horizontal Tank
	Description:	Additive tank: Red Dye #228-133 (#6) Jet naphtha
<b>Tank Dimensions</b>	Shell Length (ft):	6.00
	Diameter (ft):	4.00
	Volume (gallons):	500.00
	Turnovers:	10.00
	Net Throughput (gal/yr):	5,000.00
	Is Tank Heated (y/n):	N
	Is Tank Underground (y/n):	N
<b>Paint Characteristics</b>	Shell Color/Shade:	White/White
	Shell Condition	Good
<b>Breather Vent Settings</b>	Vacuum Settings (psig):	-0.03
	Pressure Settings (psig)	0.03*

Meteorological Data: Springfield, Missouri (Avg Atmospheric Pressure = 14.09 psia)

**Liquid Contents of Storage Tank**

Mixture/ Component	Daily Liquid Surface Temperature (° F)			Liq Bulk Temp (°F)	Vapor Pressure (psia)			Vap Mol Wgt	Liq Mass Fract	Vapor Mass Fract	Mol Wgt	Basis for Vapor Pressure Calcula- tion
	Avg	Min	Max		Avg	Min	Max					
Jet naphtha (JP-4)	57.66	51.98	63.34	55.81	1.2298	1.0594	1.4002	80			120	Option 1: VP50 = 1 VP60 = 1.3

**Emissions Report for: Annual**

Components	Losses (lbs)		
	Working Loss	Breathing Loss	Total Emissions
Jet naphtha (JP-4)	11.71	18.07	29.78

**Annual VOC Emissions from Additive Storage Tank #70**

The VOC calculations were completed with the TANKS 4.09d software provided by the U.S. EPA.

**Tank Identification and Physical Characteristics**

<b>Identification</b>	User Identification:	Springfield 70 - PTE
	City:	Springfield
	State:	Missouri
	Company:	Magellan Pipeline Company
	Type of Tank:	Vertical Fixed Roof Tank
	Description:	Additive tank: MFA PDA #228-070 Jet naphtha
<b>Tank Dimensions</b>	Shell Height (ft):	10.50
	Diameter (ft):	7.00
	Liquid Height (ft):	10.50
	Avg. Liquid Height (ft):	6.00
	Volume (gallons):	3,000.00
	Turnovers:	10.00
	Net Throughput (gal/yr):	30,000.00
	Is Tank Heated (y/n):	N
<b>Paint Characteristics</b>	Shell Color/Shade:	White/White
	Shell Condition:	Good
	Roof Color/Shade:	White/White
	Roof Condition:	Good
<b>Roof Characteristics</b>	Type:	Dome
	Height (ft):	0.00
	Radius (ft) (Dome Roof):	7.00
<b>Breather Vent Settings</b>	Vacuum Settings (psig):	-0.03
	Pressure Settings (psig):	0.03

Meteorological Data: Springfield, Missouri (Avg Atmospheric Pressure = 14.09 psia)

**Liquid Contents of Storage Tank**

Mixture/ Component	Daily Liquid Surface Temperature (° F)			Liq Bulk Temp (°F)	Vapor Pressure (psia)			Vap Mol Wgt	Liq Mass Fract	Vapor Mass Fract	Mol Wgt	Basis for Vapor Pressure Calcula- tion
	Avg	Min	Max		Avg	Min	Max					
Jet naphtha (JP-4)	57.66	51.98	63.34	55.81	1.2298	1.0594	1.4002	80			120	Option 1: VP50 = 1 VP60 = 1.3

**Emissions Report for: Annual**

Components	Losses (lbs)		
	Working Loss	Breathing Loss	Total Emissions
Jet naphtha (JP-4)	70.27	61.54	131.81



**Annual VOC Emissions from Additive Storage Tank #137**

The VOC calculations were completed with the TANKS 4.09d software provided by the U.S. EPA.

**Tank Identification and Physical Characteristics**

<b>Identification</b>	User Identification:	Springfield 137 - PTE
	City:	Springfield
	State:	Missouri
	Company:	Magellan Pipeline Company
	Type of Tank:	Vertical Fixed Roof Tank
	Description:	Additive tank: MPL CFI #228-131 (#5) Jet naphtha
<b>Tank Dimensions</b>	Shell Height (ft):	6.00
	Diameter (ft):	4.00
	Liquid Height (ft):	5.50
	Avg. Liquid Height (ft):	5.00
	Volume (gallons):	500.00
	Turnovers:	10.00
	Net Throughput (gal/yr):	5,000.00
	Is Tank Heated (y/n):	N
<b>Paint Characteristics</b>	Shell Color/Shade:	White/White
	Shell Condition	Good
	Roof Color/Shade:	White/White
	Roof Condition:	Good
<b>Roof Characteristics</b>	Type:	Dome
	Height (ft)	0.00
	Radius (ft) (Dome Roof)	4.00
<b>Breather Vent Settings</b>	Vacuum Settings (psig):	-0.03
	Pressure Settings (psig)	0.03

Meteorological Data: Springfield, Missouri (Avg Atmospheric Pressure = 14.09 psia)

**Liquid Contents of Storage Tank**

Mixture/ Component	Daily Liquid Surface Temperature (° F)			Liq Bulk Temp (°F)	Vapor Pressure (psia)			Vap Mol Wgt	Liq Mass Fract	Vapor Mass Fract	Mol Wgt	Basis for Vapor Pressure Calcula- tion
	Avg	Min	Max		Avg	Min	Max					
Jet naphtha (JP-4)	57.66	51.98	63.34	55.81	1.2298	1.0594	1.4002	80			120	Option 1: VP50 = 1 VP60 = 1.3

**Emissions Report for: Annual**

Components	Losses (lbs)		
	Working Loss	Breathing Loss	Total Emissions
Jet naphtha (JP-4)	11.71	6.29	18.00



**VOC Emissions from Tank Roof Landings**  
**(Page 1 of 4)**

Roof landings of Tanks #1510, #4001, #4002, #4003, and #6017 (EU0020 through EU0060) occur once per year in April for seasonal Reid Vapor Pressure (RVP) changes.

The following spreadsheet was used to calculate emissions from landing these floating roofs on their support legs. The emission estimate equations and tables used in the calculations are from the U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors: Volume I, Stationary Point and Area Sources, Fifth Edition*. Most equations and tables are from Chapter 7.1 Organic Liquid Storage Tanks.

1	2	3	4	5 (D)	6 (n <sub>d</sub> )	7 (s)	8 (h <sub>d</sub> )	9 (h <sub>l</sub> )	10 (h <sub>le</sub> )	11 (h <sub>v</sub> )
Tank ID	# of Roof Landings During Year	Date (month)	Product	Diameter (ft)	Idle time (days)	Bottom Slope (in/ft)	Height of Roof Deck (ft)	Height of Stock Liquid (ft)	Effective Stock Liquid Height cone: (h <sub>le</sub> = h <sub>d</sub> +(sD/72)) flat: (h <sub>le</sub> = h <sub>l</sub> ) (ft)	Height of Vapor Space (h <sub>d</sub> - h <sub>le</sub> ) (ft)
Source of Equation									EPA AP-42 Eq 1-15,16 & 17	EPA AP-42 Eq 1-15
1510	1	April	Gasoline RVP 13	96	3	0	4	0.5	0.5	3.50
4001	1	April	Gasoline RVP 13	78	3	0	4	0.5	0.5	3.50
4002	1	April	Gasoline RVP 13	78	3	0	4	0.5	0.5	3.50
4003	1	April	Gasoline RVP 13	78	3	0	4	0.5	0.5	3.50
6017	1	April	Gasoline RVP 13	60	3	0	4	0.5	0.5	3.50

Notes:

- 1) Calculations are for an Internal Floating Roof Tank with full or partial heal
- 2) Meteorological data for month of April in Springfield Missouri from TANKS 4.09

**VOC Emissions from Tank Roof Landings**  
**(Page 2 of 4)**

12 (V <sub>v</sub> )	13 (α)	14 (T <sub>AX</sub> )	15 (T <sub>AN</sub> )	16 (I)	17 (T <sub>AA</sub> )	18 (ΔT <sub>A</sub> )	19 (T <sub>LA</sub> )	20 (ΔT <sub>V</sub> )
Volume of Vapor Space ((π)(D <sup>2</sup> /4)(h <sub>v</sub> )) (ft <sup>3</sup> )	Solar Absorptance (dimensionless)	Daily Maximum Ambient Temp (°F)	Daily Minimum Ambient Temp (°F)	Daily Total Solar Insolation (Btu/ft <sup>2</sup> day)	Average Ambient Temp (°R)	Daily Temp Difference (T <sub>AX</sub> -T <sub>AN</sub> ) (°R/day)	Stock Liquid Surface Temperature (T <sub>AA</sub> + (0.56(6α-1)+ 0.0079αI)) (°R)	Vapor Space Temp Range (0.72ΔT <sub>A</sub> + 0.028αI) (°R/day)
	EPA AP-42 Table 7.1-6	EPA TANKS 4.09d	EPA TANKS 4.09d	EPA TANKS 4.09d	EPA AP-42 Eq 1-27		EPA AP-42 Eq 1-26	EPA AP-42 Eq 1-8
25333.80	0.17	67.9	44.1	1647.9	516	23.8	518.2	24.98
16724.27	0.17	67.9	44.1	1647.9	516	23.8	518.2	24.98
16724.27	0.17	67.9	44.1	1647.9	516	23.8	518.2	24.98
16724.27	0.17	67.9	44.1	1647.9	516	23.8	518.2	24.98
9896.02	0.17	67.9	44.1	1647.9	516	23.8	518.2	24.98

**VOC Emissions from Tank Roof Landings**  
**(Page 3 of 4)**

21 (RVP)	22 (S <sub>d</sub> )	23 (A)	24 (B)	25 (P)	26 (P <sub>a</sub> )	27 (M <sub>v</sub> )	28 (W <sub>v</sub> )
RVP # Stock Reid Vapor Pressure	Stock ASTM distillation slope (3, 3, 3, 2, rest)	=15.64- 1.854S <sub>d</sub> <sup>0.5</sup> - (0.8742- 0.3280S <sub>d</sub> <sup>0.5</sup> )ln (RVP)	= 8742- 1042S <sub>d</sub> <sup>0.5</sup> - (1049- 179.4S <sub>d</sub> <sup>0.5</sup> )ln(R VP)	Stock True Vapor Pressure (e <sup>x</sup> where x = A- (B/T <sub>LA</sub> ) (psia)	Atmospheric Pressure (psia)	Stock Vapor Molecular Weight (lb/lb- mole)	Stock Vapor Density (M <sub>v</sub> P/RT <sub>LA</sub> ) (lb/ft <sup>3</sup> )
	EPA AP-42 Table 7.1-4	EPA AP-42 Fig 7.1-15	EPA AP-42 Fig 7.1-15	EPA AP-42 Eq 1-24	EPA TANKS 4.09d	EPA TANKS 4.09d	EPA AP-42 Eq 1-21
11.5	3	11.7	5134.09	5.90	14.094	65	0.069
11.5	3	11.7	5134.09	5.90	14.094	65	0.069
11.5	3	11.7	5134.09	5.90	14.094	65	0.069
11.5	3	11.7	5134.09	5.90	14.094	65	0.069
11.5	3	11.7	5134.09	5.90	14.094	65	0.069

**VOC Emissions from Tank Roof Landings**  
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29 (K <sub>E</sub> )	30 (K <sub>S</sub> )	31 (S)	32 (L <sub>S</sub> )	33 (L <sub>F</sub> )	34 (L <sub>T</sub> )	35 (L <sub>T</sub> )
Vapor Space Expansion Factor ( $T_v/T_{LA}(1+0.5BP/T_{LA}(P_a-P))$ ) (dimensionless)	Standing Idle Saturation Factor ( $1/(1+0.053Ph_v)$ )	Filling Loss Saturation Factor Default = 0.6 full heal, 0.5 partial heal	Standing Idle Losses ( $n_d V_v W_v K_E K_S$ ) (lb/event)	Filling Losses ( $PV_v/RT$ ) $S M_v$ (lb/event)	Total Losses (L <sub>S</sub> + L <sub>F</sub> ) (lb/event)	Total Losses from landing per event (ton/event)
EPA AP-42 Eq 1-7, 1-10	EPA AP-42 Eq 1-20	EPA AP-42 Table 7.1-17	EPA AP-42 Eq 2-16	EPA AP-42 Eq 2-26	EPA AP-42 Eq 2-10	
0.220	0.478	0.6	550.03	1051.88	1602	0.801
0.220	0.478	0.6	363.10	694.41	1058	0.529
0.220	0.478	0.6	363.10	694.41	1058	0.529
0.220	0.478	0.6	363.10	694.41	1058	0.529
0.220	0.478	0.6	214.85	410.89	626	0.313
<b>Total</b>						<b>2.700</b>

### Annual VOC Emissions from Ethanol Unloading Skid

#### Ethanol Unloading Emission Calculations

Assumptions: (provided by applicant)

Fill pipe diameter (ft) = 1.333 ft

Fill pipe CS area (ft<sup>2</sup>) =  $\pi \times (\text{radius})^2 = 1.396 \text{ ft}^2$

8' Fill pipe volume (ft<sup>3</sup>) = area x length = 11.170 ft<sup>3</sup> = 1.990 bbls

Gasoline Rack Volume = 385,000,000 gallons or 9,166,666.67 bbls

Volume of ethanol unloaded = 10% of gasoline rack volume = 916,666.67 bbls

Volume of ethanol unloaded per truck = 190 bbls

Number of trucks unloaded per year = 916,667 / 190 = 4825 trucks

Volume of ethanol vapors purged during one unloading event

$$= 2/3 \text{ volume of fill pipe} = 2/3 \times 11.170 \text{ ft}^3 \times 0.1781 \text{ bbl/ft}^3 = 1.33 \text{ bbls}$$

Volume of ethanol vapors purged per yr = 4825 trucks x 1.326 bbl/truck = 6398.58

Prover volume = 500 gal

Prover volume per yr = 4 x 500 gal x bbl/42 gal = 47.62 bbls

Total Volume = Volume of ethanol vapors purged per yr + Prover volume per yr

$$= (6398.58 + 47.62) \times 42 \text{ gal/bbl} = 270,740.40 \text{ gal}$$

$$L_L = 12.46 \frac{SPM}{T} \text{ (Chapter 5.2, US EPA document AP-42)}$$

Where:

$L_L$  = loading loss in pounds per 1000 gallons (lb/10<sup>3</sup> gal) of liquid loaded

S = a saturation factor, assumed 0.6 for submerged loading, dedicated normal service (USEPA document AP-42, Table 5.2-1)

P = true vapor pressure of liquid loaded in pounds per square inch absolute (psia) (USEPA program TANKS 4.09d)

M = molecular weight of vapors in pounds per pound-mole (lb/lb-mole) (USEPA program TANKS 4.09d), and

T = temperature of bulk liquid loaded in °R (°F + 460)

Product	P (psia)	M (lb/lb-mole)	T °R	$L_L$ (lb/10 <sup>3</sup> gal)
Ethanol	1.3011	48.86	515.81	0.92

$$E = L_L Q$$

Where:

E = total vapor generated, in pounds (lb),

$L_L$  = loading loss in pounds per 1000 gallons (lb/10<sup>3</sup> gal) of liquid loaded, and

Q = total amount of liquid loaded, in thousands of gallons (10<sup>3</sup> gal)

Product	$L_L$ (lb/10 <sup>3</sup> gal)	Q (10 <sup>3</sup> gal)	E (lb/yr)	E (tpy)
Ethanol	0.92	271	249	0.12

Assumed Ethanol was uncontrolled. Therefore, total VOC emissions = 0.12 ton/yr

**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 Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

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