



NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

OCT 24 2019

Mr. Eddie Heck
Air Specialist
Magellan Pipeline Company - Palmyra Terminal
P.O. Box 22186
Tulsa, OK 74121-2186

RE: Operating Permit Determination
Project No. 2019-10-023, Installation ID: 127-0002

Dear Mr. Heck:

The Magellan Pipeline Company operates the Palmyra Terminal, a petroleum bulk storage and distribution installation located at 6789 County Road 312 in Palmyra, Missouri; this installation is operating pursuant to Part 70 operating permit OP2015-017. Your request for a determination of operating permit need for the Palmyra Terminal was received on October 15, 2019. The potential emissions from this installation are provided in the following table.

Potential Emissions for the Installation in tons per year

Pollutant	Potential Emissions
Nitrogen Oxides	7.02
Carbon Monoxide	17.56
Volatile Organic Compounds	58.84
Hazardous Air Pollutants (total)	3.05

The potential emissions are taken from the current operating permit, which noted that while the potential emissions were less than the major source thresholds, a Part 70 operating permit was required due to the installation being subject to 40 CFR Part 63 Subpart R *National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)*, which applies to major sources of hazardous air pollutants; the installation was a major source of hazardous air pollutants in the past. At the time of issuance of the operating permit, Subpart R applied due to EPA's "once in, always in" policy, even though the potential emissions at the time of issuance of the operating permit were below the major source thresholds. Now that the "once in, always in" policy has been rescinded, Subpart R is no longer applicable to the installation; as the applicability of Subpart R was the only reason that this installation held a Part 70 operating permit, **no operating permit is required** from the Missouri Air Pollution Control Program.



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This installation holds one or more construction permits, so is required to pay an emissions fee, and file an Emissions Inventory Questionnaire (EIQ) under State Regulation 10 CSR 10-6.110, *Submission of Emission Data, Emission Fees and Process Information*.

You are still obligated to meet all applicable air pollution control rules, Department of Natural Resources' rules, or any other applicable federal, state or local agency regulations; in particular, 40 CFR Part 60 Subparts 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* and XX *Standards of Performance for Bulk Gasoline Terminals* are still applicable to this installation. If the conditions of this installation change, a new determination may become necessary.

A copy of this letter should be kept at the installation and be made available to Department of Natural Resources' personnel upon verbal request. If you have any questions regarding this determination, please contact Stansfield, Michael at (573) 751-4817, or you may write to the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, Missouri 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Kendall B. Hale
Permits Section Chief

KBH:lb

c: Northeast Regional Office
PAMS File 2019-10-023