STATE OF MISSOURI

DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: 02 2015 - 0 0 6  Project Number: 2014-10-003
Installation Number: 155-0078

Parent Company: OakMar Terminal, LLC
Parent Company Address: 11953 Prairie Industrial Parkway, Hennepin, IL 61327

Installation Name: OakMar Terminal, LLC
Installation Address: 2353 North State Highway D, Hayti, MO 63851

Location Information: Pemiscot County, S1, T18N, R12E

Application for Authority to Construct was made for:
The transfer of diesel fuel from bulk storage to marine towing vessels. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, Construction Permits Required.

Standard Conditions (on reverse) are applicable to this permit.

Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

FEB 0 9 2015

DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES
STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Department's Air Pollution Control Program of the anticipated date of startup of these air contaminant sources. The information must be made available within 30 days of actual startup. Also, you must notify the Department of Natural Resources' regional office responsible for the area within which you are located within 15 days after the actual startup of these air contaminant sources.

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant sources(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.
SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. “Conditions required by permitting authority.”

OakMar Terminal, LLC
Pemiscot County, S1, T18N, R12E

1. Superseding Condition
   A. The conditions of this permit supersede Special Condition 1 found in the previously issued construction permit 022014-003 issued by the Air Pollution Control Program.

2. Operational Limitations
   A. OakMar Terminal, LLC shall handle less than 80,000,000 gallons of petroleum products per consecutive 12-month period.
   B. OakMar Terminal, LLC shall exclusively handle diesel or other petroleum products with a true vapor pressure less than or equal to 0.02 psi at 90°F.
   C. OakMar Terminal, LLC shall maintain records of the monthly and 12-month rolling total amount of petroleum products handled using Attachment A from Construction Permit 022014-003 or an equivalent form approved by the Air Pollution Control Program.
   D. OakMar Terminal, LLC shall maintain MSDS for all petroleum products loaded at the installation.
   E. For petroleum products that are not diesel, OakMar Terminal, LLC shall maintain records of the true vapor pressure of the petroleum product being loaded.
OakMar Terminal, LLC  
2353 North State Highway D  
Hayti, MO 63851  
Pemiscot County, S1, T18N, R12E

Parent Company:  
OakMar Terminal, LLC  
11953 Prairie Industrial Parkway  
Hennepin, IL 61327

REVIEW SUMMARY

• OakMar Terminal, LLC has applied for authority to transfer diesel fuel from bulk storage to marine towing vessels.

• HAP emissions are expected from the proposed equipment. Naphthalene will be emitted from diesel vapors during the refueling of marine towing vessels (EP-03).

• None of the New Source Performance Standards (NSPS) apply to the installation.

• None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.

• 40 CFR Part 63, Subpart Y – *National Emission Standards for Marine Tank Vessel Loading Operations* is not applicable to this facility. Marine tank vessel loading operations do not include refueling of marine tank vessels.

• No air pollution control equipment is being used in association with this project.

• This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of all pollutants are below de minimis levels but above the “Insignificance Levels” listed in 10 CSR 10-6.061, *Construction Permit Exemptions*, (3)(A)3.A.

• This installation is located in Pemiscot County, an attainment area for all criteria pollutants.

• This installation is on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. It is classified as #22, *Petroleum storage and transfer facilities with a capacity exceeding three hundred thousand (300,000) barrels*. Therefore, the installation's major source level is 100 tons per year and fugitive emissions are counted toward major source applicability.
• Emissions testing is not required for the equipment.

• An amendment to your Intermediate Operating Permit application is required for this installation within 90 days of equipment startup.

• Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

OakMar Terminal, LLC is a bulk diesel fuel storage and loadout terminal located in Hayti, Missouri. Diesel fuel is received from barges and transferred into storage tanks where it is then loaded out by tank trucks for distribution. The facility has an 80,000,000 gallon limitation on the amount of diesel fuel it can handle in any 12 month period, which was established in the previous construction permit. The facility employs a vapor collection system and open flame air assisted smokeless flare to capture and reduce emissions from the diesel loading rack (EP-02). OakMar Terminal, LLC is a minor source for construction permitting and currently requires an intermediate operating permit because potential emissions of VOCs and HAPs exceed major source levels.

Marquis-Missouri Terminal, LLC (County-Plant #155-0077) operates an existing crude oil storage and loadout facility in Hayti, Missouri as well. Both facilities were determined to be one installation (see 10 CSR 10-6.020(2)(l)(17), as the following criteria were met:

1. The two facilities share the same SIC code (5171 Petroleum Bulk Stations and Terminals)
2. The two facilities are located on one or more contiguous or adjacent properties: both properties are located at 2353 North State Highway D in Hayti, Missouri
3. The two facilities are under common control: both facilities share a common parent company, mailing address, and contact person

The following New Source Review permits have been issued to OakMar Terminal, LLC and Marquis-Missouri Terminal, LLC from the Air Pollution Control Program:

Table 1: Permit History

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>092012-001</td>
<td>Installation of a crude oil storage and loadout operation</td>
</tr>
<tr>
<td>092012-001A</td>
<td>Amendment to calculations</td>
</tr>
<tr>
<td>022014-003</td>
<td>New diesel fuel terminal</td>
</tr>
</tbody>
</table>

PROJECT DESCRIPTION

OakMar Terminal, LLC plans to use existing equipment to allow for the refueling of marine towing vessels. A liquid line will transfer diesel fuel from the existing diesel storage tank through an electric valve and meter in order to dispense fuel to the towboats’ dedicated fuel tanks. The maximum design rate of the submerged loading refueling operation is 18,000 gallons per hour. No pollution control equipment is being used in association with this new operation.
EMISSIONS/CONTROLS EVALUATION

The emission factors used in this analysis were obtained from the EPA document AP-42, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources, Fifth Edition (AP-42).

Emissions from loading losses incurred during marine vessel refueling were calculated using Equation (1) found in AP-42 Section 5.2.2.1.1, Loading Losses (July 2008). A saturation factor of 0.5 for submerged barge loading was used (Table 5.2-1). The true vapor pressure of diesel was taken to be 0.009 psia, the molecular weight of diesel is 130 lb/lbmol, and a liquid temperature of 529.67°R was assumed. Naphthalene emissions were determined by multiplying the weight percent of naphthalene by the total diesel loading loss. The weight percentage was taken from a diesel fuel MSDS, which listed the fuel to be 0.5% naphthalene by weight.

Emissions from equipment leaks were calculated using emission factors found in AP-42, Protocol for Equipment Leak Emission Estimates, Tables 2-1 and 2-4 (November 1995).

The following table provides an emissions summary for this project. Existing potential emissions were taken from the previous construction permit 022014-003. Existing actual emissions were taken from Marquis-Missouri Terminal, LLC’s 2013 EIQ. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8,760 hours per year).

Table 2: Emissions Summary (tons per year)

<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>25.0</td>
<td>32.34</td>
<td>N/D</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>PM&lt;sub&gt;10&lt;/sub&gt;</td>
<td>15.0</td>
<td>9.93</td>
<td>N/D</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>PM&lt;sub&gt;2.5&lt;/sub&gt;</td>
<td>10.0</td>
<td>1.66</td>
<td>N/D</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>SO&lt;sub&gt;2&lt;/sub&gt;</td>
<td>40.0</td>
<td>0.07</td>
<td>0.00</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>NO&lt;sub&gt;x&lt;/sub&gt;</td>
<td>40.0</td>
<td>11.21</td>
<td>1.55</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>VOC</td>
<td>40.0</td>
<td>51.92</td>
<td>16.44</td>
<td>10.67</td>
<td>62.59</td>
</tr>
<tr>
<td>CO</td>
<td>100.0</td>
<td>15.84</td>
<td>8.26</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>GHG (CO&lt;sub&gt;2&lt;/sub&gt;e)</td>
<td>100,000</td>
<td>15,568</td>
<td>N/D</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Naphthalene</td>
<td>10.0</td>
<td>0.14</td>
<td>0.05</td>
<td>0.05</td>
<td>0.19</td>
</tr>
<tr>
<td>Combined HAPs</td>
<td>25.0</td>
<td>8.02</td>
<td>1.43</td>
<td>0.05</td>
<td>8.07</td>
</tr>
</tbody>
</table>

N/A = Not Applicable; N/D = Not Determined

1The unconditioned potential VOC and HAP emissions exceeded major source levels; therefore, the installation is required to obtain an Intermediate or Part 70 Operating Permit

PERMIT RULE APPLICABILITY

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

OakMar Terminal, LLC shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved.

GENERAL REQUIREMENTS

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

- Operating Permits, 10 CSR 10-6.065

- Restriction of Emission of Visible Air Contaminants, 10 CSR 10-6.220

- Restriction of Emission of Odors, 10 CSR 10-6.165

STAFF RECOMMENDATION

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

Ryan Schott
New Source Review Unit

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated September 24, 2014, received September 30, 2014, designating OakMar Terminal, LLC as the owner and operator of the installation.

Abbreviations and Acronyms

% ............ percent
°F ............ degrees Fahrenheit
acfm .......... actual cubic feet per minute
BACT ......... Best Available Control Technology
BMPs ......... Best Management Practices
Btu .......... British thermal unit
CAM ........ Compliance Assurance Monitoring
CAS .......... Chemical Abstracts Service
CEMS ...... Continuous Emission Monitor System
CFR .......... Code of Federal Regulations
CO ........... carbon monoxide
CO₂ .......... carbon dioxide
CO₂e ........ carbon dioxide equivalent
COMS ....... Continuous Opacity Monitoring System
CSR .......... Code of State Regulations
dscf .......... dry standard cubic feet
EIQ .......... Emission Inventory Questionnaire
EP .......... Emission Point
EPA ........ Environmental Protection Agency
EU .......... Emission Unit
fps .......... feet per second
ft .......... feet
GACT ...... Generally Available Control Technology
GHG ........ Greenhouse Gas
gpm .......... gallons per minute
gr .......... grains
GWP ........ Global Warming Potential
HAP ........ Hazardous Air Pollutant
hr .......... hour
hp .......... horsepower
lb .......... pound
lbs/hr ....... pounds per hour
MACT ...... Maximum Achievable Control Technology
µg/m³ ...... micrograms per cubic meter
m/s .......... meters per second
Mgal ....... 1,000 gallons
MW ........ megawatt
MHDR ....... maximum hourly design rate
MMBtu .... Million British thermal units
MMCF ...... million cubic feet
MSDS ...... Material Safety Data Sheet
NAAQS ...... National Ambient Air Quality Standards
NESHAPs National Emissions Standards for Hazardous Air Pollutants
NOₓ ........ nitrogen oxides
NSPS ........ New Source Performance Standards
NSR ........ New Source Review
PM .......... particulate matter
PM₂.₅ ...... particulate matter less than 2.5 microns in aerodynamic diameter
PM₁₀ ...... particulate matter less than 10 microns in aerodynamic diameter
ppm .......... parts per million
PSD .......... Prevention of Significant Deterioration
PTE ........ potential to emit
RACT ...... Reasonable Available Control Technology
RAL .......... Risk Assessment Level
SCC .......... Source Classification Code
scfm ........ standard cubic feet per minute
SDS .......... Safety Data Sheet
SIC .......... Standard Industrial Classification
SIP .......... State Implementation Plan
SMAL ...... Screening Model Action Levels
SOₓ .......... sulfur oxides
SO₂ .......... sulfur dioxide
tph .......... tons per hour
tpy .......... tons per year
VMT ......... vehicle miles traveled
VOC .......... Volatile Organic Compound
Ms. Elizabeth Steinhour  
Director of Environmental Affairs  
OakMar Terminal, LLC  
11953 Prairie Industrial Parkway  
Hennepin, IL 61327  

RE: New Source Review Permit - Project Number: 2014-10-003

Dear Ms. Steinhour:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application, and with your amended operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 of RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, Truman State Office Building, P.O. Box 1557, Jefferson City, Missouri 65102, www.oa.mo.gov/ahc.

If you have any questions regarding this permit, please contact Ryan Schott, Department of Natural Resources’ Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp  
New Source Review Unit Chief

SH:rsl

Enclosures

c: Southeast Regional Office  
PAMS File: 2014-10-003  
Permit Number: