



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: **022015-006**

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

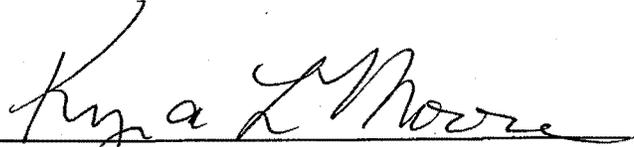
Location Information: Pemiscot County, S1, T18N, R12E

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 09 2015

EFFECTIVE DATE


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.

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Permit No.	
Project No.	2014-10-003

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.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW

Project Number: 2014-10-003
Installation ID Number: 155-0078
Permit Number:

OakMar Terminal, LLC
2353 North State Highway D
Hayti, MO 63851
Pemiscot County, S1, T18N, R12E

Complete: October 29, 2014

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)(I)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

Permit Number	Description
092012-001	Installation of a crude oil storage and loadout operation
092012-001A	Amendment to calculations
022014-003	New diesel fuel terminal

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)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions ¹	Existing Actual Emissions (2013 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM	25.0	32.34	N/D	N/A	N/A
PM ₁₀	15.0	9.93	N/D	N/A	N/A
PM _{2.5}	10.0	1.66	N/D	N/A	N/A
SO _x	40.0	0.07	0.00	N/A	N/A
NO _x	40.0	11.21	1.55	N/A	N/A
VOC	40.0	51.92	16.44	10.67	62.59
CO	100.0	15.84	8.26	N/A	N/A
GHG (CO ₂ e)	100,000	15,568	N/D	N/A	N/A
Naphthalene	10.0	0.14	N/D	0.05	0.19
Combined HAPs	25.0	8.02	1.43	0.05	8.07

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

Date

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.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.

APPENDIX A

Abbreviations and Acronyms

%percent	m/s meters per second
°Fdegrees Fahrenheit	Mgal 1,000 gallons
acfmactual cubic feet per minute	MW megawatt
BACT Best Available Control Technology	MHDR maximum hourly design rate
BMPs Best Management Practices	MMBtu Million British thermal units
Btu British thermal unit	MMCF million cubic feet
CAM Compliance Assurance Monitoring	MSDS Material Safety Data Sheet
CAS Chemical Abstracts Service	NAAQS ... National Ambient Air Quality Standards
CEMS Continuous Emission Monitor System	NESHAPs National Emissions Standards for Hazardous Air Pollutants
CFR Code of Federal Regulations	NO_x nitrogen oxides
CO carbon monoxide	NSPS New Source Performance Standards
CO₂ carbon dioxide	NSR New Source Review
CO₂e carbon dioxide equivalent	PM particulate matter
COMS Continuous Opacity Monitoring System	PM_{2.5} particulate matter less than 2.5 microns in aerodynamic diameter
CSR Code of State Regulations	PM₁₀ particulate matter less than 10 microns in aerodynamic diameter
dscf dry standard cubic feet	ppm parts per million
EQ Emission Inventory Questionnaire	PSD Prevention of Significant Deterioration
EP Emission Point	PTE potential to emit
EPA Environmental Protection Agency	RACT Reasonable Available Control Technology
EU Emission Unit	RAL Risk Assessment Level
fps feet per second	SCC Source Classification Code
ft feet	scfm standard cubic feet per minute
GACT Generally Available Control Technology	SDS Safety Data Sheet
GHG Greenhouse Gas	SIC Standard Industrial Classification
gpm gallons per minute	SIP State Implementation Plan
gr grains	SMAL Screening Model Action Levels
GWP Global Warming Potential	SO_x sulfur oxides
HAP Hazardous Air Pollutant	SO₂ sulfur dioxide
hr hour	tph tons per hour
hp horsepower	tpy tons per year
lb pound	VMT vehicle miles traveled
lbs/hr pounds per hour	VOC Volatile Organic Compound
MACT Maximum Achievable Control Technology	
µg/m³micrograms per cubic meter	

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.oe.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:rs1

Enclosures

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