



PART 70 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.

Operating Permit Number: OP2010-041
Expiration Date: MAY 18 2015
Installation ID: 109-0002
Project Number: 2004-08-016

Installation Name and Address

TransMontaigne Operating Company L.P. - Mt. Vernon Terminal
15376 Highway 96
Mt. Vernon, MO 65712
Lawrence County

Parent Company's Name and Address

TransMontaigne Partners, L.P.
P.O. Box 5660
Denver, CO 80217

Installation Description:

TransMontaigne Operating Company, L.P.. operates a bulk petroleum terminal in Mt. Vernon, Missouri, with an aggregate storage capacity of 9,003,300 gallons. Process equipment includes 5 fixed roof and internal floating roof tanks storing petroleum products, 1 ethanol tank, transmix tanks, Tank 12 (closed loop oil/water system), 3 additive tanks and a truck loading rack. Volatile organic compound (VOC) emissions result from bulk storage and the transfer, loading & unloading of gasoline, diesel fuel and ethanol.

MAY 19 2010

Effective Date

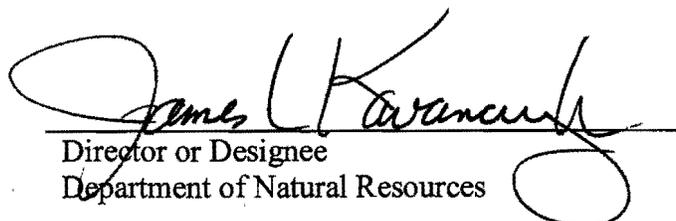

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

TransMontaigne Product Services Inc. operates a bulk petroleum terminal in Mt. Vernon, Missouri, with an aggregate storage capacity of 9,008,130 gallons. The terminal operates five (5) vertical tanks equipped with internal or domed external floating roofs which store petroleum products, one (1) horizontal tank which stores ethanol, three (3) horizontal tanks which store additives and a 2-bay truck loading rack. The terminal has the capacity to receive product from cargo tank trucks or from their pipeline. The terminal ships product in cargo tank trucks via the loading racks or to another facility via the pipeline. Volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions result from bulk storage and the transfer, loading & unloading of gasoline, diesel fuel and ethanol.

The following table lists the emissions reported by the installation in the Emissions Inventory Questionnaire (EIQ) for the most recent five years.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM ₁₀)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2008	--	--	0.12	8.03	0.30	--	--
2007	--	--	0.39	8.12	0.87	--	0.44
2006	--	--	0.27	8.82	0.67	--	0.47
2005	--	--	0.22	8.37	0.55	--	0.43
2004	--	--	0.27	8.82	0.67	--	0.47

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and which is identified as having unit-specific emission limitations.

Emission Unit #	Description of Emission Unit	Emission Point No.
EU0010	2 Bay Submerged Truck Loading Rack	EP07
EU0020	Tank #1: 1.512 Million Gallon Internal Floating Roof Gasoline Tank	EP01
EU0025	Tank #5: 4.830 Million Gallon Internal Floating Roof Gasoline Tank	EP05
EU0050	Tank #2: 0.714 Million Gallon Internal Floating Roof Gasoline Tank	EP02
EU0060	Tank #3: 0.966 Million Gallon Vertical Domed External Floating Roof Gasoline Tank	EP03
EU0065	Tank #4: 0.966 Million Gallon Vertical Domed External Floating Roof Gasoline Tank	EP04
EU0070	Tank #10: 300 Gallon Horizontal Transmix Tank	EP10

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.

Emission Unit #	Description of Emission Unit
EU0030	Tank #7: 45 Bbl Fixed Roof Additive Tank
EU0030	Tank #8: 48 Bbl Fixed Roof Additive Tank
EU0030	Tank #9: 7 Bbl Fixed Roof Additive Tank
EU0040	Fugitive Emissions from pumps, valves, fittings, other
EU0040	Fugitive Emissions from vehicle vapor transit losses
EU0080	Tank #11: 0.015 Million Gallon Horizontal Fixed Roof Ethanol Tank
EU0090	Tank #12: 96" x 32' tank in closed loop oil/water system

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

Construction Permit 0697-013, Issued July 25, 1997

Construction Permit 0697-014, Issued July 25, 1997

Construction Permit 0698-015, Issued June 1, 1998

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 as of the date that this permit is issued.

PERMIT CONDITION PW001

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

Emission / Operational Limitation:

The permittee shall not ship more than 350,000,000 gallons of any combination of gasoline or diesel through the pipeline to the TransMontaigne Terminal in Rogers, Arkansas, during any consecutive 12-month period.

Monitoring / Recordkeeping Requirements:

- 1) The permittee shall maintain accurate records of the type, volume, and transfer date / period for each product transferred via the pipeline to the TransMontaigne Terminal in Rogers, Arkansas. Attachment E contains a log satisfying these recordkeeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 2) The permittee shall maintain these records on site for the most recent 60 months.
- 3) The permittee shall immediately make these records available to Missouri Department of Natural Resources' personnel upon request.

Reporting Requirements:

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 350,000,000 of total gasoline & diesel transferred via the pipeline to Rogers, Arkansas.

PERMIT CONDITION PW002

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

Emission / Operational Limitation:

The permittee may store gasoline or documented lower vapor pressure products in Tanks #1 – #5 [EU0020, EU0025, EU0050, EU0060, and EU0065].

Monitoring / Recordkeeping Requirements:

- 1) The permittee shall maintain records of the petroleum liquid(s) stored in EU0020, EU0025, EU0050, EU0060, and EU0065 (Tanks #1 – #5) using the log shown in Attachment F or an equivalent created by the permittee. These records shall contain at least the following information:
 - a) The name of each petroleum liquid stored;
 - b) The period that each petroleum liquid was stored in the tank; and
 - c) The maximum true vapor pressure of that petroleum liquid during the respective storage period. Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined according to §60.116b(e).
- 2) The permittee shall maintain these records on site for the most recent 5 years.
- 3) The permittee shall immediately make these records available to Missouri Department of Natural Resources' personnel upon request.

Reporting Requirements:

Reports of any deviations from the monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

PERMIT CONDITION PW003

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

- 1) The permittee shall perform a monthly leak inspection of all equipment in gasoline service for total organic compounds liquid or vapor leaks. For this inspection, detection methods incorporating sight, sound, and smell are acceptable.
 - a) As defined in §63.11100 and §60.502(j), the equipment to be inspected includes:
 1. 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.
 2. The entire vapor processing system except the exhaust port(s) or stack(s).
 3. The loading racks used to handle gasoline.
 - b) As required by §60.502(j), the vapor processing system and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks.
 - c) As defined in §63.11100, “in gasoline service” means that the equipment is used in a system that transfers gasoline or gasoline vapors.
- 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 **paragraph [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** and include the event on the semiannual excess emissions report described in **Reporting**.
- 5) The permittee shall operate and maintain all equipment, including air pollution control equipment, and monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times, including periods of startup, shutdown, and malfunction. Measures to be taken include, but are not limited to, the following:
 - a) Minimize gasoline spills;
 - b) Clean up spills as expeditiously as practicable;
 - c) Cover all open gasoline containers and all gasoline storage fill pipes with a gasketed seal when not in use;

- d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.
- 6) As an alternative to compliance with the provisions in paragraphs (a) through (d) 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 type, identification number, and 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). Each finding shall be recorded in the logbook.
 - d) 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 H (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 all records of inspections, maintenance, repairs, and notifications onsite for a minimum of five years.
- 6) The permittee shall immediately make such records available to Missouri 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, at the time the semiannual compliance report is submitted. 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 is an excess emission event. The following information shall be included in the excess emissions report, as applicable:

- 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:
 1. The date on which the leak was detected;
 2. The date of each attempt to repair the leak;
 3. The reasons for the delay of repair; and
 4. The date of successful repair.
- 2) Reports of any other deviations from the monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

PERMIT CONDITION PW004

*10 CSR 10-6.060 Construction Permits Required
Construction Permit 0697-014, Issued July 25, 1997*

Emission / Operational Limitation:

- 1) If in the opinion of the Director, a continuing situation of demonstrated nuisance odors exists in violation of 10 CSR 10-3.090, the Director may require the permittee to submit a corrective action plan within ten (10) days adequate to timely and significantly mitigate the odors.
- 2) The permittee shall implement any such plan immediately upon its approval by the Director.
- 3) Failure to either submit or implement such a plan shall be a violation this permit.

Monitoring / Recordkeeping Requirements:

- 1) None, unless a corrective action plan is required to be implemented and such plan specifies requirements.
- 2) The permittee shall maintain all records onsite for a minimum of five years.
- 3) The permittee shall immediately make records available to Missouri Department of Natural Resources' personnel upon request.

Reporting Requirements:

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 any exceedance, if the nuisance odors show that the source exceeded the limitation.

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 as of the date that this permit is issued.

EU0010 – 2 Bay Submerged Truck Loading Rack			
Emission Unit	Description	Manufacturer/Model # (Year Installed)	2006 EIQ Reference #
EU0010	2 Bay Submerged Truck Loading Rack	Unknown (1997)	EP07
	Vapor destruction unit (Enclosed Flare)	John Zink / Model ZFT-2-8-35-X-2/8 (1997)	Control Device

PERMIT CONDITION EU0010-001
10 CSR 10-6.060 Construction Permits Required
Construction Permit 0697-014, Issued July 25, 1997

Emission / Operational Limitations:

- 1) EU0010 shall be equipped with a vapor collection and disposal system (VDU) designed to collect total organic compounds vapors displaced from tank trucks during product loading.
- 2) The permittee shall operate the VDU at all times that EU0010 is loading cargo tank trucks.
- 3) The VDU shall be operated and maintained in accordance with the manufacturer’s specifications and good engineering practices.

Monitoring / Recordkeeping Requirements:

- 1) The VDU shall be equipped with a gauge or meter which indicates the operating parameters established during the most recent performance test. The gauge or meter shall be located such that it may be easily observed by Missouri Department of Natural Resources’ personnel.
- 2) The permittee shall record the operating parameters established during the most recent performance test at least once during every 24-hour period.
- 3) The VDU shall be monitored with an ultraviolet (UV) scanner to indicate that the VDU is operational. This operating status shall be captured and printed on the terminal’s *Event Log*.
- 4) The 24-hour automation system installed at the facility shall not allow the loading of products into gasoline cargo tank trucks unless the VDU is operational and the status can be verified on the terminal’s *Event Log*.
- 5) The *Event Log* shall be located such that it may be easily observed by Missouri Department of Natural Resources’ personnel upon request.
- 6) The permittee shall maintain an operating and maintenance log for the VDU which records the following:
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements or additions of components.
 - c) Attachment D contains a log satisfying these recordkeeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 7) The permittee shall maintain all records onsite for a minimum of five years.

- 8) The permittee shall immediately make all records available for inspection to Missouri 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 permittee determines that any exceedance of the permit conditions has occurred.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

PERMIT CONDITION EU0010-002

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

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations

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

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

40 CFR Part 64 Compliance Assurance Monitoring

Emission Limitations:

- 1) Emissions to the atmosphere from the vapor collection and disposal system (VDU) due to the loading of liquid product into gasoline cargo tank trucks shall not exceed 10 milligrams of total organic compounds per liter of gasoline loaded.
- 2) The permittee shall ensure that the gasoline loading racks in EU0010 comply with the most stringent applicable provisions of both 40 CFR Part 60, Subpart XX and 40 CFR Part 63, Subpart BBBB (compliance date January 10, 2011).

Operational / Procedural Requirements:

- 1) Loading of Gasoline Cargo Tanks, §63.11088(a) and (b), §63.11092(f) and §60.502:
 - a) The permittee shall not allow gasoline cargo tank trucks to be filled with liquid product using the EU0010 loading racks unless the cargo tank trucks are equipped with vapor collection equipment that is compatible with the installation's vapor collection system.
 - b) The permittee shall ensure that the terminal's and the tank truck's vapor collection systems are connected any time that liquid product is loaded into a gasoline cargo tank truck. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the loading racks.
 - c) The permittee shall ensure that EU0010 loading racks transfer liquid product only into vapor-tight gasoline cargo tanks. The following procedures should be observed:
 1. The permittee shall obtain the vapor tightness documentation described in §60.505(b) and §63.11094(b) for each gasoline cargo tank which is to be loaded using EU0010 loading racks. This documentation shall be updated at least once per year, to reflect the most current test results, and shall include, as a minimum, the following information:
 - i. Name of test: Gasoline Delivery Tank Pressure Test-EPA Reference Method 27 or periodic railcar bubble leak testing.
 - ii. Cargo tank owner's name and address.

- iii. Cargo tank identification number.
 - iv. Testing location.
 - v. Date of test.
 - vi. Tester name and signature.
 - vii. Witnessing inspector, if any: Name, signature, and affiliation.
 - viii. Vapor tightness repair: Nature of repair work and when performed in relation to vapor tightness testing.
 - ix. Test results: test pressure; pressure or vacuum change, mm of water; time period of test; number of leaks found with instrument; and leak definition.
2. The permittee shall require the tank identification number to be recorded as each gasoline cargo tank is loaded using EU0010 loading racks.
 3. The permittee shall cross-check each tank identification number obtained in paragraph (b) above with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless one of the following conditions is applicable:
 - i. If less than an average of one gasoline cargo tank per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or
 - ii. If less than an average of one gasoline cargo tank per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually.
 - iii. If either the quarterly or semiannual cross-check reveals that these conditions were not maintained, the source must return to biweekly monitoring until such time as these conditions are again met.
 4. In the event that a cross-check identifies that a gasoline cargo tank was loaded without the appropriate vapor tightness documentation, the permittee shall:
 - i. Notify the owner or operator of each non-vapor-tight gasoline cargo tank loaded by EU0010 loading racks within 1 week of the completion of the documentation cross-check.
 - ii. Take appropriate steps to ensure that the non-vapor-tight gasoline cargo tank will not be reloaded by EU0010 loading racks until vapor tightness documentation for that gasoline cargo tank is obtained which meets the requirements described in paragraph (3a) above.
 5. Alternate procedures to those described in paragraphs (3a) through (d) of this section for limiting gasoline cargo tank loadings may be used upon application to and approval by the Director.
- d) The permittee shall ensure that vapor collection system is designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack.
 - e) The permittee shall ensure that the vapor collection system is operated according to the following requirements:
 1. 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).
 2. No pressure-vacuum vent in the vapor collection system for EU0010 shall begin to open at a system pressure less than 4,500 pascals (450 mm of water).

2) Operation of the VDU, §63.11092(b) and (d):

- a) The permittee shall determine an operating parameter value for the VDU using one of the following methods:
1. If the permittee elects to conduct a new performance test according to the requirements of §63.11092(a)(1), the permittee shall:
 - i. Select an operating parameter based on the parameter data monitored during the most recent performance test, supplemented by engineering assessments and the manufacturer's recommendations.
 - ii. The permittee shall 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 listed in Emission Limitations, paragraph [1] above.
 2. If the permittee elects to comply with the performance testing alternatives listed in Monitoring Requirements, paragraph [1)(b) or 1)(c)], below, the permittee shall:
 - i. Monitor an operating parameter that has been approved by the Director and is specified in the installation's current enforceable operating permit.
 - ii. Determine an operating parameter value based on engineering assessment and the manufacturer's recommendation and 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 listed in Emission Limitations, paragraph [1] above.
 - iii. At the time that the Director requires a new performance test, the permittee must determine the monitored operating parameter value according to the requirements specified in paragraph [6)(a)], above.
- b) The permittee shall operate the vapor processing system in a manner not to exceed or not to go below, as appropriate, the operating parameter value for the parameters determined as described in paragraph [6)(a) or b)], above.
1. 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 listed in Emission Limitations, paragraph [1] above, except as specified in paragraph [7)(b)] below.
 2. Malfunctions that are discovered during monitoring and inspections conducted as required by the monitoring and inspection plan described in Monitoring Requirements, paragraph [5)(b)2.], below, shall not constitute a violation of the emission standard listed in Emission Limitations, paragraph [1] above if corrective actions as described in the monitoring and inspection plan are followed. The permittee must:
 - i. Initiate corrective action to determine the cause of the problem within 1 hour;
 - ii. Initiate corrective action to fix the problem within 24 hours;
 - iii. Complete all corrective actions needed to fix the problem as soon as practicable consistent with good air pollution control practices for minimizing emissions;
 - iv. Minimize periods of start-up, shutdown, or malfunction; and
 - v. Take any necessary corrective actions to restore normal operation and prevent the recurrence of the cause of the problem.

3) Operation and Maintenance Requirements, §63.6(e)(1):

The permittee shall comply with the applicable provisions of §63.6(e)(1), including:

- a) At all times, including periods of startup, shutdown, and malfunction, the permittee must operate and maintain the EU0010 loading racks, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.
- b) Malfunctions must be corrected as soon as practicable after their occurrence. To the extent that an unexpected event arises during a startup, shutdown, or malfunction, the permittee must comply by minimizing emissions during such a startup, shutdown, and malfunction event consistent with safety and good air pollution control practices.

Monitoring Requirements:

NOTE: Compliance Assurance Monitoring (CAM) applies to these units, so this permit condition incorporates parts of 40 CFR Part 64 and, through that, parts of 40 CFR Part 60. Where conflicts arise between these documents and 40 CFR Part 60, the approved conditions of the CAM plan and CAM test plan (included in this permit condition) govern. A copy of the CAM plan as submitted by the permittee is included with this permit as Attachment J.

- 1) Monitoring Requirements for the loading rack and VCU:
 - a) The permittee shall take timely corrective action during periods of excursions where any of the indicators performance is out of the operational range. A corrective action includes an investigation of the reason for the excursion, evaluation of the problem that led to the excursion and necessary follow-up action to return the emission unit to within the indicator and operational range. An excursion is determined by the average discreet data point over a period of time. An excursion does not indicate a violation of an applicable requirement.
 - b) The monitoring requirements for this unit shall be as specified in Table 1: TransMontaigne Operating Company, L.P. – Mt. Vernon Terminal – APCP Id. No. 109-0002 Vapor Combustion Unit (VCU) Controlling Emissions by Vapor Collection System on a Two-Bay Product Loading Rack.
 - c) An excursion and its associated averaging time for each emission unit shall be as specified in Table 1: TransMontaigne Operating Company, L.P.– Mt. Vernon Terminal – APCP Id. No. 109-0002 Vapor Combustion Unit (VCU) Controlling Emissions by Vapor Collection System on a Two-Bay Product Loading Rack.
 - d) TransMontaigne Operating Company, L.P.. shall conduct monitoring continuously except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities, in accordance with §64.7(c). Although compliance with the emission limitation may be exempted in some circumstances during conditions such as startup, shutdown, and malfunction, TransMontaigne Operating Company, L.P. is required to operate and maintain the source in accordance with good air pollution control practices for minimizing emissions during such periods. This requires TransMontaigne Operating Company, L.P. to minimize periods of startup, shutdown or malfunction, and take corrective action to restore normal operation and prevent recurrence of the problem that led to the excursion except where the excursion was related to an excused startup, shutdown, or malfunction.
 - e) The permittee shall follow the following procedure in response to excursions or exceedances.
 1. Upon detecting an excursion or exceedance, the permittee shall restore operation of the unit to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that

operations returned to normal without operator action, or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

[\[§64.7\(d\)\(1\)\]](#)

2. Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. [\[§64.7\(d\)\(2\)\]](#)

Table 1

TransMontaigne TransMontaigne Operating Company, L.P.– Mt. Vernon Terminal - ACPD Id. No. 109-0002 Vapor Combustion Unit (VCU) Controlling Emissions by Vapor Collection System on a Two-Bay Product Loading Rack						
Indicator	VCU Pilot Flame	Leak Detection and Repair (LDAR) of Vapor Collection System	Operation of Assist Air Blower	Operation of Vapor Line Valve	Tanker Truck Vapor Tightness	Comprehensive VCU Inspection
Measurement Approach	Ultraviolet Flame Detector (UFD)	Sight, sound, and smell leak inspections of liquid and vapor piping components associated with the loading rack.	VCU Programmable Logic Controller (PLC) system start-up check	Pressure Sensor/Transmitter	Tanker Truck Vapor Tightness Testing performed annually by tanker truck owner/operator.	Routine cleaning, adjustment, and repair of the VCU system in accordance with John Zink recommendations.
Indicator Range	Presence of a pilot flame.	No leaks in the Vapor Collection System.	Blower running.	Less than 17.5 inches of water column.	Tanker truck driver's presentation of valid tightness testing certification.	Inspections performed semiannually. A John Zink-qualified technician must be present during at least one semiannual inspection per year.
Excursion	Absence of a pilot flame.	A leak in the Vapor Collection System.	Blower not running.	Equal to or greater than 17.5 inches of water column.	Failure to present a valid tightness testing certification.	Failure to perform inspections in accordance with that specified in the indicator range.
	All excursions trigger an inspection, corrective action, and a reporting requirement.					

<p>Quality Improvement Plan (QIP) Threshold</p>	<p>The Permittee shall submit a QIP to the Missouri Department of Natural Resources, Air Pollution Control Program, Compliance/Enforcement Section if any indicator experiences five (5) excursions, as defined herein, in a 6-month reporting period. The QIP shall be submitted along with the Semiannual Monitoring Report required in the Reporting section of this table below. Additionally, the Permittee shall conduct a full performance test within one (1) year of the issuance of this Part 70 Permit, and every five (5) years thereafter for the life of this Part 70 Permit unless the Permit has been legally modified, to demonstrate compliance with 40 CFR Part 60, Subpart XX, <i>Standards of Performance for Bulk Gasoline Terminals</i>.</p>					
<p>Data Representativeness</p>	<p>The flame sensor is located within the VCU to view the pilot flame as designed by the manufacturer, John Zink.</p>	<p>The piping components at the loading rack, vapor collection system, and VCU must have integrity to prevent leaks.</p>	<p>The PLC on the VCU is hard programmed to validate the operation of the blower prior to authorizing loading.</p>	<p>Pressure is monitored within the vapor line. If pressure equals or exceeds 17.5 inches of water column, PLC shall initiate an automatic shutdown.</p>	<p>All tanker trucks loaded shall be properly tested in accordance with 40 CFR Part 60, Subpart XX.</p>	<p>Inspection and maintenance of the VCU system helps to ensure proper ongoing operation.</p>
<p>Verification of Operational Status</p>	<p>The pilot flame system, as well as the flame sensing system, will be inspected and maintained per manufacturer's recommendations.</p>	<p>Timely inspections.</p>	<p>The proper functioning of the blower will be determined during scheduled maintenance per manufacturer's recommendations.</p>	<p>Inspection of the vapor valve and controls in accordance with manufacturer's recommendations.</p>	<p>NA</p>	<p>NA</p>
<p>QA/QC Practices and Criteria</p>	<p>Semiannual inspection of VCU.</p>	<p>Monthly inspection of the vapor collection system. Any and all leaks shall be repaired within fifteen (15) days.</p>	<p>Semiannual inspection of VCU.</p>	<p>Semiannual inspection of VCU.</p>	<p>Each time driver requests loading, the validity of the testing certification is checked (i.e., is current certification on file?). If no longer valid, the truck will not be allowed to load.</p>	<p>NA</p>

Monitoring Frequency	Continuous while receiving loading request from loading rack Terminal Management System (TMS) computer.	Monthly.	Each time a request to load is received from the TMS computer.	Continuous while receiving loading request from loading rack TMS computer.	Annual retesting and submittal of valid test certifications.	Semiannually by Permittee's operations personnel and annually with a John Zink qualified technician present.
Data Collection Procedure	All excursions shall be logged by operations personnel.	Sight, sound and smell, and leaks, shall be logged by operations personnel.	Any faults/failures shall be logged by operations personnel.	All excursions shall be logged by operations personnel.	Loading Rack TMS computer system	Results of inspections and repairs shall be logged by operations personnel.
Averaging Period	None/NA	None/NA	None/NA	None/NA	None/NA	None/NA
Reporting	The Permittee shall submit monitoring reports in accordance with 40 CFR Part 64, § 64.9, especially noting the number, duration, and cause for any and all excursions, exceedances, and monitor downtime. The reports shall be submitted on a semiannual basis, along with or as a part of, the installation's Semiannual Monitoring Report submitted in accordance with 10 CSR 10-6.065, <i>Operating Permits</i> .					

1) Performance Testing, §63.11092 and §60.503:

- a) The permittee shall demonstrate that the vapor processing and collection system meets the emission limitation specified in Emission Limitations, paragraph [1] above using one of the following methods:
 1. Conduct a performance test on the vapor processing and collection systems according to one of the following procedures:
 - i. Use the test methods and procedures in §60.503, except a reading of 500 ppm shall be used to determine the level of leaks to be repaired under §60.503(b), or
 - ii. Use alternative test methods and procedures in accordance with the alternative test method requirements in §63.7(f).
 2. If the permittee is operating the gasoline loading rack in compliance with an enforceable State, local, or tribal rule or permit that requires the loading rack to meet an emission limit of 80 milligrams per liter of gasoline loaded or less, the permittee may submit a statement by a responsible official of the facility certifying the compliance status of the loading rack in lieu of an additional test to demonstrate compliance with the emission limit of 40 CFR Part 63 Subpart BBBBBB as described in paragraph [1a)] above.
 3. If the permittee has conducted performance testing on the vapor processing and collection systems within 5 years prior to January 10, 2008, and the test is for the affected facility and is representative of current or anticipated operating processes and conditions, the permittee may submit the results of such testing in lieu of the test required to demonstrate compliance with the emission limit of 40 CFR Part 63 Subpart BBBBBB as described in paragraph [1a)] above, provided the testing was conducted using the test methods and procedures in §60.503. If the Director determines that the prior test data is unacceptable, the facility is still required to meet the requirement to conduct an initial performance test within 180 days of the compliance date specified in §63.11083.
 4. Additionally, the Permittee shall conduct a full performance test within one year of the issuance of this Part 70 renewal and every 5 years thereafter for the life of this Part 70 permit, unless that permit has been legally modified, to demonstrate compliance with 40 CFR Part 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals.
- b) For each performance test conducted under paragraph [1a)] of this section, the permittee shall determine an operating parameter value for the vapor processing system using the methods listed in §63.11092(b)(1) and ensure that this parameter is continuously monitored as a part of the performance test.
- c) Performance tests conducted after the initial test on the VDU shall meet the requirements of paragraph [1a)] above. For performance tests performed after the initial test, the permittee shall document the reasons for any change in the operating parameter value since the previous performance test.
- d) The permittee shall maintain a record of the most recent performance test completed according to the provisions of §60.503(d) to document compliance with the maximum gauge pressure limitation in Operational / Procedural Requirements, paragraph [5a) or b)].

2) Installation, Operation, and Maintenance of a Continuous Monitoring System, §63.11092 and §63.8:

Refer also to the Compliance Assurance Monitoring (CAM) plan in Attachment J.

- a) The permittee shall install, calibrate, certify, operate, and maintain, according to the manufacturer's specifications, a continuous monitoring system (CMS) while gasoline vapors are displaced to the vapor processor system as specified below in paragraphs [5a) or 5b)]:

1. Where a thermal oxidation system other than a flare is used, a continuous parameter monitoring system (CPMS) capable of measuring temperature must be installed in the firebox or in the ductwork immediately downstream from the firebox in a position before any substantial heat exchange occurs.
2. As an alternative to the CPMS capable of measuring temperature described in paragraph [1)a], the permittee may choose to meet the requirements described below:
 - i. The presence of a thermal oxidation system pilot flame shall be monitored using a heat-sensing device, such as an ultraviolet beam sensor or a thermocouple, installed in proximity to the pilot light to indicate the presence of a flame.
 - ii. Develop and submit to the Director a monitoring and inspection plan that describes the permittee's approach for meeting the requirements described below:
 - a. The thermal oxidation system shall be equipped to automatically prevent gasoline loading operations from beginning at any time that the pilot flame is absent.
 - b. The permittee shall verify, during each day of operation of the loading rack, the proper operation of the assist-air blower, the vapor line valve, and the emergency shutdown system. Verification shall be through visual observation or through an automated alarm or shutdown system that monitors and records system operation.
 - c. The permittee shall perform semi-annual preventive maintenance inspections of the thermal oxidation system according to the recommendations of the manufacturer of the system.
 - d. The monitoring plan developed under paragraph [5)b)2.] of this section shall specify conditions that would be considered malfunctions of the thermal oxidation system during the inspections or automated monitoring performed under paragraphs [5)b)2.(ii) and (iii)], describe specific corrective actions that will be taken to correct any malfunction, and define what the permittee would consider to be a timely repair for each potential malfunction.
 - e. The permittee shall document any system malfunction, as defined in the monitoring and inspection plan, and any activation of the automated alarm or shutdown system with a written entry into a log book or other permanent form of record. Such record shall also include a description of the corrective action taken and whether such corrective actions were taken in a timely manner, as defined in the monitoring and inspection plan, as well as an estimate of the amount of gasoline loaded during the period of the malfunction.

Note: Permit condition EU0010-001 contains the Compliance Assurance Monitoring Approach for the CPMS and Attachment J contains the Compliance Assurance Monitoring Plan which meets the above requirements.

3. Monitoring an alternative operating parameter or a parameter of a vapor processing system other than those listed in paragraphs [5)b)1. or 2.] above, will be allowed upon demonstrating to the Director's satisfaction that the alternative parameter demonstrates continuous compliance with the emission limitation of 10 milligrams of total organic compounds per liter of gasoline loaded.
 - b) The permittee shall maintain and operate the continuous monitoring system (CMS) according to any additional applicable requirements of §63.8.

Recordkeeping Requirements:

- 1) Cargo Tank Vapor Tightness Testing, §63.11094(b), §63.11094(c) and §60.505:

- a) The permittee shall maintain the tank truck vapor tightness documentation required by **Operational / Procedural Requirements, paragraph [3)a) through c)]** on file at the installation in a permanent form available for inspection.
- b) As an alternative to keeping records at the installation of each gasoline cargo tank test result, the permittee may comply with the requirements in either (a) or (b) below:
 1. The permittee shall maintain an electronic copy of each record that is instantly available at the terminal. The copy of each record must be an exact duplicate image of the original paper record with certifying signatures and the Director must be notified in writing that the installation using this method to maintain compliance.
 2. If the installation uses 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 must be made available (e.g., via facsimile) for inspection by Missouri Department of Natural Resources' personnel during the course of a site visit, or within a mutually agreeable time frame. The copy of each record must be an exact duplicate image of the original paper record with certifying signatures and the Director must be notified in writing that the installation using this method to maintain compliance.
 3. The permittee shall keep documentation of any notifications required as described in **Operational / Procedural Requirements, paragraph [3)d)]** when a cross-check identifies that a gasoline cargo tank was loaded without the appropriate vapor tightness documentation.
- 2) **Continuous Monitoring System, §63.11094(f) and §63.10:**
 - a) The permittee shall maintain the up-to-date and readily available records of the following items associated with the continuous parameter monitoring system:
 1. The continuous monitoring data required in **Monitoring Requirements, paragraph [5)]** above. 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.
 2. The monitoring and inspection plan described in **Monitoring Requirements, paragraph [5)b)2.]**, above.
 3. A record of all system malfunctions, as specified in **Monitoring Requirements, paragraph [5)b)2.(v)]**, above.
 - b) The permittee shall maintain a record of all data and calculations, engineering assessments, and manufacturer's recommendations used in determining the operating parameter value described in **Operational / Procedural Requirements, paragraph [6)a) or 6)b)2.]**, above. These records shall be maintained on file for a minimum of 5 years, or until a new performance test is conducted and approved by the Director, whichever is longer.
 - c) 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 to the Missouri Department of Natural Resources, Air Pollution Control Program. The Director will specify appropriate reporting and recordkeeping requirements as part of the review of the permit application.
 - d) The permittee shall maintain records of any performance tests on file for a minimum of 5 years or until another performance test is performed, whichever is longer.
 - e) The permittee shall maintain any additional records specified by §63.10(b).

3) General:

- a) As required by §63.10(b)(2)(iii), the permittee shall maintain records of all required maintenance performed on the EU0010 loading racks, air pollution control and monitoring equipment. This permit condition is met by Permit Condition EU0010-001, Monitoring / Recordkeeping Requirements, 6.
- b) As required by §60.505(f), the permittee shall keep records of all replacements or additions of components performed on the existing vapor processing system.
- c) The permittee shall maintain all records onsite for a minimum of five years unless a longer period is specified with the requirement.
- d) The permittee shall immediately make any records available to Missouri Department of Natural Resources' personnel upon request.

Reporting Requirements:

1) Notifications required by §63.11093 and §63.9 for 40 CFR Part 63, Subpart BBBBBB:

- a) The permittee shall submit the following notifications to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 as applicable for the EU0010 loading racks:
 1. The permittee shall submit a Notification of Compliance Status as specified in §63.9(h). The permittee shall report simultaneously with the Notification of Compliance Status all data and calculations, engineering assessments, and manufacturer's recommendations used in determining the operating parameter value as described in Operational / Procedural Requirements, paragraph [6)a) or 6)b)2.], above.
 2. The permittee shall submit a written Notification of Performance Test as specified in §69.9(e) prior to initiating testing intended to demonstrate compliance with the compliance option selected. The Notification must be submitted at least 30 calendar days before the performance test is scheduled to begin to allow the Missouri Department of Natural Resources, Air Pollution Control Program to review and approve the site-specific test plan required under §63.7(c), if requested by the Department of Natural Resources, and to have an observer present during the test.
 3. The permittee shall submit additional notifications specified in §63.9, as applicable.

2) Reports required for Loading Racks by §60.505 and §63.11095(a)(2) and (b)(1)-(4):

- a) The permittee shall submit an excess emissions report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, at the time the semiannual compliance report is submitted. The following occurrences are excess emissions events, and the following information shall be included in the excess emissions report, as applicable:
- b) Each exceedance or failure to maintain, as appropriate, the monitored operating parameter value determined in Operational / Procedural Requirements, paragraph [6)a) or 6)b)1.], above. 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.
- c) Each instance in which malfunctions discovered during monitoring and inspections conducted as required by the Monitoring and Inspection Plan described in Monitoring Requirements, paragraph [5)b)2.], above, were not resolved according to the necessary corrective actions described in Operational / Procedural Requirements, paragraph [7)b)1.], above. The report shall include a description of the malfunction and the timing of the steps taken to correct the malfunction.

- d) Each instance of a nonvapor-tight gasoline cargo tank loading at the installation in which the permittee 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.
 - e) Each reloading of a nonvapor-tight gasoline cargo tank at the installation before the permittee has obtained vapor tightness documentation for that cargo tank in accordance with the procedures described in **Operational / Procedural Requirements, paragraph [3)d)2.]**, above.
- 3) **General, All:**
- a) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.
 - b) The permittee shall comply with any additional applicable reporting requirements of §63.10.

PERMIT CONDITION EU0010-003

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

Emission Limitations:

- 1) The permittee shall not cause or permit emissions to be discharged into the atmosphere from the VDU any visible emissions with an opacity greater than 20%.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring Requirements:

- 1) The permittee shall conduct opacity readings on the VDU for EU0010 using the procedures listed in the Core Permit Requirements for this rule.
- 2) The permittee shall maintain the monitoring schedule listed in the Core Permit Requirements for conducting these observations.

Recordkeeping Requirements:

- 1) The permittee shall maintain records of all opacity observations as described in the Core Permit Requirements for this rule using Attachments B and C, or equivalent forms created by the permittee.
- 2) The permittee shall maintain records of any equipment malfunctions as described in the Core Permit Requirements for this rule using Attachment D or an equivalent form created by the permittee.
- 3) The permittee shall maintain all records on site for the most recent 5 years.
- 4) The permittee shall immediately make these 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 permittee determines, using the Method 9 test, that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

EU0020 and EU0025 – Internal Floating Roof Petroleum Storage Tanks with a storage capacity greater than or equal to 75 cubic meters, Constructed after July 23, 1984 (Storage Tanks #1 and #5)			
Emission Unit	Description	Manufacturer/Model #	2006 EIQ Reference #
EU0020	Tank #1: 1.512 Million Gallon Internal Floating Roof Tank	Unknown (1985)	EP01
EU0025	Tank #5: 4.830 Million Gallon Internal Floating Roof Tank	Unknown (1989)	EP05

PERMIT CONDITION EU0020-001 and EU0025-001
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
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart A General Provisions and Subpart BBBB National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

Emission / Operational Limitations:

- 1) The permittee shall control emissions from the EU0020 and EU0025 gasoline storage vessels (Tanks #1 and #5) in accordance with the most stringent applicable provisions of 40 CFR Part 60, Subpart Kb and 40 CFR Part 63, Subpart BBBB (compliance date January 10, 2011).
- 2) Storage tanks that are subject to, and comply with, the control requirements of 40 CFR Part 60 Subpart Kb, will be deemed to be in compliance with 40 CFR Part 63 Subpart BBBB.
- 3) The permittee shall not store any volatile organic liquid with a true vapor pressure of greater than 11.1 psi (76.6 kPa) in EU0020 or EU0025 (Tanks #1 or #5) unless a closed vent system and control system or equivalent is installed as described in **Equipment / Procedural Requirements, paragraph [2] or [3]**, below.

Equipment / Procedural Requirements:

- 1) **Internal Floating Roof, §60.112b(a)(1):**
 - a) The permittee shall ensure that the EU0020 and EU0025 internal floating roof gasoline storage tanks meet the applicable requirements of §60.112b(a)(1). Each tank shall meet the following specifications for a fixed roof in combination with an internal floating roof:
 1. 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.
 2. 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:
 - 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.
 - 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.

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.

3. 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.
4. 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.
5. 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.
6. 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.
7. 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.
8. 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.
9. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

2) Closed Vent System and Control Device, §60.112b(a)(3):

- a) The permittee may choose to equip EU0020 or EU0025 (Tank #1 or #5) with a closed vent system and control device as an alternative to the requirements listed in **paragraph [1]**. If EU0020 or EU0025 will be used to store a volatile organic liquid with a true vapor pressure of greater than 11.1 psi (76.6 kPa), that tank must be equipped with a closed vent system and control device. The closed vent system and control device installed shall meet the specifications of §60.112b(a)(3) as follows:
- b) The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in part 60, subpart VV, §60.485(b).
- c) The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater. If a flare is used as the control device, it shall meet the specifications described in the general control device requirements (§60.18) of the General Provisions.

3) Equivalent Alternate Device, §60.112b(a)(4) & §60.114b:

The permittee may request approval from the Director to equip EU0020 or EU0025 (Tank #1 or #5) with an equivalent system to those described in **paragraph [1] or [2]** that will achieve a reduction in emissions at least equivalent to the reduction in emissions achieved by those methods, as provided for in §60.114b.

4) Closed Vent System and Control Device, §63.11087 and §60.112b(a)(3):

If the permittee installs a closed vent system and control device, the permittee shall meet the specific Equipment/Operational Requirements listed in Attachment I-2.

Monitoring / Recordkeeping Requirements:

1) Internal Floating Roof, §60.113b(a) and §60.115b(a)(2):

- a) The permittee shall perform the following inspections as described in §60.113b(a) for each EU0020 or EU0025 (Tank #1 or #5) tank that is equipped with a fixed roof in combination with an internal floating roof:
 1. 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 gasoline. 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 permittee shall repair the items before filling the storage vessel.
 2. 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 gasoline 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 permittee 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 Missouri Department of Natural Resources, Air Pollution Control Program in the inspection report required in **Reporting Requirements, paragraph [1]** below, (i.e. §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.
 3. For vessels equipped with a double-seal system as specified in **Equipment / Procedural Requirements, paragraph [1b)2.]** above, (i.e. §60.112b(a)(1)(ii)(B)):
 - i. Visually inspect the vessel as specified in **paragraph [1d)]** below, (i.e. §60.113b(a)(4)), at least every 5 years; or
 - ii. Visually inspect the vessel as specified in **paragraph [1b)]** above, (i.e. §60.113b(a)(2)).
 4. 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 permittee 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 this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in **paragraph [1b)]** of this section, (i.e. §60.113b(a)(2).)
 5. The permittee shall notify the Missouri Department of Natural Resources, Air Pollution Control Program in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by **paragraphs [1a)] and [1d)]** of this section, (i.e. §60.113b(a)(1) and (a)(4)), to afford the Department of Natural Resources the

opportunity to have an observer present. If the inspection required by paragraph [1d] of this section, (i.e. §60.113b(a)(4)), is not planned and the permittee could not have known about the inspection 30 days in advance or refilling the tank, the permittee shall notify the Missouri Department of Natural Resources, Air Pollution Control Program 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 Missouri Department of Natural Resources, Air Pollution Control Program at least 7 days prior to the refilling.

6. The permittee shall keep a record of each inspection performed as required in paragraphs [1a) through d]. 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 including seals, internal floating roof, and fittings. These records shall be maintained onsite for a minimum of five years.
- 2) Closed Vent System and Control Device, §63.11092(e)(3) and §63.11092 (a) through (d), 63.11094(a) and §60.115b(c):

If the permittee installs a closed vent system and control device, the permittee shall comply with the testing, monitoring and recordkeeping requirements specified in Attachment I-2.
- 3) General, §60.116b and §63.11094(a):
 - a) The permittee shall keep readily accessible records showing the storage vessel dimension and an analysis showing the capacity of each EU0020 and EU0025 (Tanks #1 and #5) storage vessel. These records shall be maintained onsite for the life of the tank or a minimum of five years, whichever is longer.
 - b) The permittee shall maintain records of the petroleum liquid(s) stored in EU0020 and EU0025 (Tanks #1 and #5) using the log shown in Attachment F or an equivalent created by the permittee. These records shall be maintained onsite for a minimum of five years and shall contain at least the following information:
 1. The name of each petroleum liquid stored;
 2. The period that each petroleum liquid was stored in the tank; and
 3. The maximum true vapor pressure of that petroleum liquid during the respective storage period. Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined according to §60.116b(e).
 - c) The permittee shall maintain all records onsite for a minimum of five years unless a longer period is specified with the requirement.
 - d) The permittee shall immediately make any record available for inspection to Missouri Department of Natural Resources' personnel upon request.

Reporting Requirements:

- 1) Notifications required by §63.11093 and §63.9 for 40 CFR Part 63, Subpart BBBBBB:
 - a) The permittee shall submit the following notifications to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 as applicable for the EU0020 and EU0025 internal floating roof tanks:
 1. The permittee shall submit a Notification of Compliance Status as specified in §63.9(h). The Notification of Compliance Status must state which of the compliance options referenced in Table 1 to Subpart BBBBBB is used to comply with the subpart.
 2. The permittee shall submit a written Notification of Performance Test as specified in §69.9(e) prior to initiating testing intended to demonstrate compliance with the compliance

option selected. The Notification must be submitted at least 30 calendar days before the performance test is scheduled to begin to allow the Missouri Department of Natural Resources, Air Pollution Control Program to review and approve the site-specific test plan required under §63.7(c), if requested by the Department of Natural Resources, and to have an observer present during the test.

3. The permittee shall submit additional notifications specified in §63.9, as applicable.

2) Reports required for Internal Floating Roof Tanks by §60.115b(a) and §63.11095(a)(1):

a) The permittee shall submit the following reports to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 as applicable for each EU0020 or EU0025 internal floating roof tank:

1. After installing the internal floating roof as described in Equipment / Procedural Requirements, paragraph [1] above, the permittee shall submit a report to the Air Pollution Control Program 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), which requires a notification of the actual date of initial startup of the tank as equipped with the control equipment that meets the specifications. The report shall be postmarked within 15 days after the actual date of initial startup.

2. If any of the conditions described in Monitoring / Recordkeeping Requirements, paragraph [1b], (i.e. §60.113b(a)(2)), are detected during the annual visual inspection required, the permittee shall submit a report to the Air Pollution Control Program within 30 days of the inspection. The 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.

3. After each inspection required by Monitoring / Recordkeeping Requirements, paragraph [1c], (i.e. §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, the permittee shall submit a report to Air Pollution Control Program within 30 days of the inspection. The report shall identify the storage vessel, the reason it did not meet the applicable specifications, and list each repair made.

3) Reports required for a Closed Vent System and Control Device by §63.11095(a)(1) and §60.115b(d):

If the permittee installs a closed vent system and control device, the permittee shall comply with the reporting requirements specified in Attachment I-2.

4) General, All:

Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

EU0050, EU0060, and EU0065 – Internal Floating Roof Petroleum Storage Tanks with a storage capacity greater than or equal to 75 cubic meters, Constructed prior to June 11, 1973 (Storage Tanks #2, #3, and #4)			
Emission Unit	Description	Manufacturer/Model #	2006 EIQ Reference #
EU0050	Tank #2: 0.714 Million Gallon Internal Floating Roof Tank	Unknown (1971)	EP02
EU0060	Tank #3: 0.966 Million Gallon Domed External Floating Roof Tank	Unknown (1959)	EP03
EU0065	Tank #4: 0.966 Million Gallon Domed External Floating Roof Tank	Unknown (1959)	EP04

PERMIT CONDITION EU0050-001, EU0060-001, and EU0065-001
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
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission / Operational Limitations:

- 1) The permittee shall control emissions from each EU0050, EU0060, and EU0065 (Tanks #2, #3, and #4) gasoline storage vessel with a design capacity greater than or equal to 75 m³ in accordance with the applicable provisions of 40 CFR Part 63, Subpart BBBBBB, Table 2.
- 2) The permittee shall continue to control emissions from EU0050, EU0060, and EU0065 using the specified floating roofs and seals for internal floating roofs described in 40 CFR 60 Subpart Kb. The permittee may elect to use the specified floating roofs and seals described in 40 CFR 63 Subpart WW or a closed vent system and control device as listed in the table below.

Compliance Method	Additional Permit Conditions
40 CFR 63 Subpart WW Requirements for Internal Floating Roof Tanks	Attachment I-1
Closed Vent System and Control Device to reduce emissions by 95%	Attachment I-2

If the permittee elects an alternate method of compliance, the permittee shall meet the specific Equipment/Operational Requirements, Monitoring/Recordkeeping Requirements, and Reporting Requirements listed in Attachment I-1 or I-2 that apply to the control method selected in lieu of those presented below.

- 3) The permittee shall ensure that EU0050, EU0060, and EU0065 (Tank #2, #3, and #4) are in compliance with a selected control method by January 10, 2011.
- 4) The permittee shall voluntarily continue to operate EU0050, EU0060, and EU0065 in compliance with the requirements of 40 CFR Part 60 Subpart Kb until these emission units are in compliance with the requirements of 40 CFR Part 63 Subpart BBBBBB.

Equipment / Procedural Requirements:

Internal Floating Roof, §63.11087 and §60.112b(a)(1):

The permittee shall ensure that the EU0050, EU0060, and EU0065 internal floating roof gasoline storage tanks (Tanks #2, #3, and #4) meet the applicable requirements of §60.112b(a)(1), except for the secondary seal requirements in §60.112b(a)(1)(ii)(B) and the requirements in §60.112b(a)(1)(iv) through (ix). Each tank shall meet the following specifications for a fixed roof in combination with an internal floating roof:

- 1) 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.
- 2) 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:
 - a) 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.
 - b) 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.
- 3) 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.

Monitoring / Recordkeeping Requirements:

- 1) *Internal Floating Roof, §63.11092(e)(1), §63.11094(a), and §60.113b(a):*
 - a) The permittee shall perform the following inspections as described in §60.113b(a) for each EU0050, EU0060, and EU0065 tank that is equipped with a fixed roof in combination with an internal floating roof:
 1. 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 gasoline. 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 permittee shall repair the items before filling the storage vessel.
 2. 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 gasoline 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 permittee 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 Missouri Department of Natural Resources, Air Pollution Control Program in the inspection report required in **Reporting Requirements, paragraph [2]** below, (i.e. §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.

3. 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 permittee 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 this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraph [1b] of this section, (i.e. §60.113b(a)(2).)
 4. The permittee shall notify the Missouri Department of Natural Resources, Air Pollution Control Program in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs [1a] and [1c] of this section, (i.e. §60.113b(a)(1) and (a)(4)), to afford the Department of Natural Resources the opportunity to have an observer present. If the inspection required by paragraph [1c] of this section, (i.e. §60.113b(a)(4)), is not planned and the permittee could not have known about the inspection 30 days in advance or refilling the tank, the permittee shall notify the Missouri Department of Natural Resources, Air Pollution Control Program 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 Missouri Department of Natural Resources, Air Pollution Control Program at least 7 days prior to the refilling.
 5. The permittee shall keep a record of each inspection performed as required in paragraphs [1a] through c]. 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 including seals, internal floating roof, and fittings. These records shall be maintained onsite for a minimum of five years.
- 2) General, §63.11094(a) and §60.116b:
- a) The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the EU0050, EU0060, and EU0065 storage vessels. These records shall be maintained onsite for the life of each tank or a minimum of five years, whichever is longer.
 - b) If an alternate control method is elected for EU0050, EU0060 and/or EU0065 as described in Emission / Operational Limits, paragraph [2], the permittee shall maintain a copy of Attachment I-1 or I-2 as applicable for the method selected for the tank(s).
 - c) The permittee shall maintain all records onsite for a minimum of 5 years unless a longer period is specified with the requirement.
 - d) The permittee shall immediately make any record available for inspection to Missouri Department of Natural Resources' personnel upon request.

Reporting Requirements:

- 1) Notifications required by §63.11093 and §63.9 for 40 CFR Part 63, Subpart BBBBBB:
 - a) The permittee shall submit the following notifications to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 as applicable for the EU0050, EU0060, and EU0065 internal floating roof tanks:

1. The permittee shall submit a Notification of Compliance Status as specified in §63.9(h). The Notification of Compliance Status must state which of the compliance options referenced in Table 1 to Subpart BBBBBB is used to comply with the subpart.
 2. The permittee shall submit a written Notification of Performance Test as specified in §69.9(e) prior to initiating testing intended to demonstrate compliance with the compliance option selected. The Notification must be submitted at least 30 calendar days before the performance test is scheduled to begin to allow the Missouri Department of Natural Resources, Air Pollution Control Program to review and approve the site-specific test plan required under §63.7(c), if requested by the Department of Natural Resources, and to have an observer present during the test.
 3. The permittee shall submit additional notifications specified in §63.9, as applicable.
- 2) Reports required for Internal Floating Roof Tanks by §63.11095(a)(1) and §60.115b(a):
- a) The permittee shall submit the following reports to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 as applicable for the EU0050 internal floating roof tank:
 - b) After installing the internal floating roof as described in Equipment / Procedural Requirements, paragraph [1] above, the permittee shall submit a report to the Air Pollution Control Program 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), which requires a notification of the actual date of initial startup of the tank as equipped with the control equipment that meets the specifications. The report shall be postmarked within 15 days after the actual date of initial startup.
 - c) If any of the conditions described in Monitoring / Recordkeeping Requirements, paragraph [1b], (i.e. §60.113b(a)(2)), are detected during the annual visual inspection required, the permittee shall submit a report to the Air Pollution Control Program within 30 days of the inspection. The 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.
- 3) General, All:
 Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

EU0070 – Horizontal Petroleum Storage Tank with a storage capacity of less than 75 cubic meters (Storage Tank #10)			
Emission Unit	Description	Manufacturer/Model #	2006 EIQ Reference #
EU0070	Tank #10: 300 Gallon Horizontal Fixed Roof Tank	Unknown (1998)	EP10

PERMIT CONDITION EU0070-001
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit 0697-014, Issued July 25, 1997

Emission / Operational Limitations:

- 1) The permittee shall limit the throughput of EU0070 (Tank #10) to 365 barrels of any petroleum product in any consecutive 12-month period.

- 2) The permittee shall not store any liquid in EU0070 (Tank #10) that has a true vapor pressure greater than unleaded gasoline (RVP10).

Monitoring / Recordkeeping Requirements:

- 1) The permittee shall maintain records of the petroleum liquid(s) stored in EU0070 (Tank #10) using the log shown in Attachment G or an equivalent created by the permittee. These records shall contain the following information:
 - a) The name of each petroleum liquid stored;
 - b) The period that each petroleum liquid was stored in the tank;
 - c) The total quantity received or transferred (throughput) during the time period; and
 - d) The maximum true vapor pressure of that petroleum liquid during the respective storage period.
Available data on the storage temperature may be used to determine the maximum true vapor pressure as described in §60.116b(e).
- 2) The permittee shall calculate the monthly product throughput and shall record the total product throughput on a monthly basis with a consecutive 12-month total.
- 3) The permittee shall maintain these records onsite for a minimum of five years.
- 4) The permittee shall immediately make any record available to Missouri 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 any month if the 12-month cumulative total shows that the source exceeded the 365 barrel limitation on throughput.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

PERMIT CONDITION EU0070-002

*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*

Emission / Operational Limitations:

- 1) The permittee shall maintain all openings in a closed position when not in use.
- 2) The permittee shall ensure that EU0070 (Tank 10) is in compliance with the standard by January 10, 2011.

Monitoring / Recordkeeping Requirements:

- 1) The permittee shall maintain EU0070 (Tank #10) in good operating condition and keep records of all maintenance, repairs and tests performed on the tank using the log shown in Attachment D or an equivalent created by the permittee.
- 2) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 3) All records shall be maintained for five years.

Reporting Requirements:

- 1) Notifications required by §63.11093 and §63.9 for 40 CFR Part 63, Subpart BBBBBB:
 - a) The permittee shall submit the following notifications to the Missouri Department of Natural Resources, Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as applicable for the EU0070 horizontal roof tank:
 1. The permittee shall submit a Notification of Compliance Status as specified in §63.9(h). The Notification of Compliance Status must state which of the compliance options referenced in Table 1 to Subpart BBBBBB is used to comply with the subpart.
 2. The permittee shall submit a written Notification of Performance Test as specified in §69.9(e) prior to initiating testing intended to demonstrate compliance with the compliance option selected. The Notification must be submitted at least 30 calendar days before the performance test is scheduled to begin to allow the Missouri Department of Natural Resources, Air Pollution Control Program to review and approve the site-specific test plan required under §63.7(c), if requested by the Department of Natural Resources, and to have an observer present during the test.
 3. The permittee shall submit additional notifications specified in §63.9, as applicable.
- 2) General, All:

Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted annually to the Missouri Department of Natural Resources, Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, in the annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

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) 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 10-6.045 Open Burning Requirements

- 1) The permittee shall not conduct, cause, permit or allow the disposal of tires, petroleum-based products, asbestos containing materials, and trade waste by open burning, 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 (4) dwelling units, provided that the refuse originates on the same premises, with the following additional restrictions:
 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) Land clearing of vegetative debris, provided all burning occurs -
 1. Outside of any incorporated area or municipality and outside of the Kansas City metropolitan area, Springfield-Greene County area, and the St. Louis metropolitan area;
 2. At least two hundred (200) yards from the nearest occupied structure; and
 3. Land clearing of vegetative debris that does not meet the conditions of subparagraphs d)(1) and d)(2) of this rule may be open burned provided an open burning permit is obtained as found in paragraph 3) below;
 - c) Yard waste, with the following additional restrictions:
 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:
 - i. 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;

- ii. 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;
 - iii. The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - iv. 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.
- d) Fire training exercises. Fires set for the purposes of training fire fighters and industrial employees in fire fighting methods provided that -
1. The training is conducted in accordance with National Fire Protection Association standards, NFPA 1403, Standard on Live Fire Training Evolutions (2002 Edition), for fire fighters and NFPA 600, Standard on Industrial Fire Brigades (2005 Edition), for industrial employees. The provisions of NFPA 1403 and 600 shall apply and are hereby incorporated by reference in this rule, as published by the National Fire Protection Association, 11 Tracy Drive, Avon, MA 02322. This rule does not incorporate any subsequent amendments or additions. These exercises include, but are not limited to, liquefied gas propane fueled simulators, flashover simulators and stationary live burn towers; and
 2. Acquired structures to be used for training exercises are subject to the requirements of 10 CSR 10-6.080, subsection (3)(M), National Emission Standard for Asbestos. These requirements include, but are not limited to, inspection of and notification to the Director. All petroleum-based products are to be removed from any acquired structure that is to be burned as part of a training exercise;
- 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 TransMontaigne Operating Company L.P. - Mt. Vernon Terminal fails to comply with the conditions or any provisions of the permit.
- 4) TransMontaigne Operating Company L.P. - Mt. Vernon Terminal 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 TransMontaigne Operating Company L.P. - Mt. Vernon Terminal fails to comply with the provisions or any condition of the permit.
- 5) 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.
- 6) 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.

- 7) 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 10-6.050 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(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(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(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) annually.
- 2) The permittee may be required by the Director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) 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 to satisfy the requirements of the Federal Clean Air Act, Title V.
- 5) The permittee shall complete required reports on state supplied EIQ forms or in a form satisfactory to the Director and the reports shall be submitted to the Director by June 1 after the end of each reporting period.
- 6) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 7) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

Emission Limitation:

- 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.

Monitoring:

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:

- 1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
- 2) Should no violation of this regulation be observed during this period then-
 - a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - b) If a violation is noted, monitoring reverts to weekly.
 - c) Should no violation of this regulation be observed during this period then-
 - i) The permittee may observe once per month.
 - ii) If a violation is noted, monitoring reverts to weekly.
- 3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

The permittee shall document all readings on Attachment A, or its equivalent, noting the following:

- 1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
- 2) Whether the visible emissions were normal for the installation.
- 3) Whether equipment malfunctions contributed to an exceedance.
- 4) Any violations and any corrective actions undertaken to correct the violation.

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 10-3.090 Restriction of Emission of Odors

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.

This requirement is not federally enforceable.

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

Emission Limitation:

No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units.

Monitoring:

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The permittee must maintain the following monitoring schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
 - b) Should the permittee observe no violations of this regulation during this period then-
 - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - ii) If a violation is noted, monitoring reverts to weekly.
 - iii) Should no violation of this regulation be observed during this period then-
 - (1) The permittee may observe once per month.
 - (2) If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

The permittee shall maintain records of all observation results using Attachment B (or its equivalent), noting:

- 1) Whether any air emissions (except for water vapor) were visible from the emission units;
- 2) All emission units from which visible emissions occurred;

- 3) Whether the visible emissions were normal for the process;
- 4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
- 5) The permittee shall maintain records of all USEPA Method 9 opacity tests performed.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone
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- 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.

- 5) 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
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- 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(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(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) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi 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, this includes deviations or Part 64 exceedances.
 - 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.A 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 semiannual 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(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(6)(C)1.F Severability Clause

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

10 CSR 10-6.065(6)(C)1.G 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 pursuant to 10 CSR 10-6.065(6)(C)1.

10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios

None

10 CSR 10-6.065(6)(C)3 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 EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, as well as the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions 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(6)(C)6 Permit Shield

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
 - a) The application requirements are included and specifically identified in this permit, or
 - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
 - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
 - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
 - c) The applicable requirements of the acid rain program,
 - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
 - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

10 CSR 10-6.065(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(6)(C)8 Operational Flexibility

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable

under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify 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, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, The permittee shall provide advance written notice 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, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the ACP as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

10 CSR 10-6.065(6)(C)9 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. 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 subject to any requirements under Title IV of the Act or is a Title I modification;
 - 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 notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. 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.
 - 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; and

- d) The permit shield shall not apply to these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Dudley Tarlton, Vice President ESOH. On August 31, 2009, the Air Pollution Control Program was informed that Ed Luebke, Director of Pipeline Operations, is now the responsible official. 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(6)(E)6 Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) The Missouri Department of Natural Resources 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,
- 3) 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,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) 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(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 C

Opacity Emission Observations (Method 9)

This record keeping sheet or something similar may be used to satisfy the recordkeeping requirements of Core Permit Requirements for 10 CSR 10-6.220.

Company _____ Observer _____
 Location _____ Observer Certification Date _____
 Date _____ Type Installation _____
 Time _____ Point of Emission _____
 Control Device _____

Hour	Min	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from _____ to _____ % opacity.
 The source was in compliance at the time evaluation was made: Yes No

(Signature of Observer)

ATTACHMENT E
Log of Petroleum Products Shipped via the Pipeline

*This record keeping sheet or something similar may be used to show compliance with permit condition PW001.
 Record each material shipped and the throughput in gallons during each month.*

Month / Year	Material Shipped	Volume Shipped (gallons)	12-month Rolling Total (gallons)
			12-month Rolling Total not to exceed 350,000,000 gallons
		Total All:	
			12-month Rolling Total not to exceed 350,000,000 gallons
		Total All:	
			12-month Rolling Total not to exceed 350,000,000 gallons
		Total All:	

DUPLICATE THIS FORM AS NEEDED

ATTACHMENT G
Petroleum Product Throughput Log for Tank #10

*This record keeping sheet or something similar may be used to show compliance with permit condition EU0070-001.
 Record each material stored and the throughput in barrels during each month.*

Month / Year	Material Stored	Throughput (bbl)	12-month Rolling Total (bbl)
			12-month Rolling Total not to exceed 365 bbl
	Total All:		
			12-month Rolling Total not to exceed 365 bbl
	Total All:		
			12-month Rolling Total not to exceed 365 bbl
	Total All:		

DUPLICATE THIS FORM AS NEEDED

ATTACHMENT H
Leak Inspection Log Sheet

Date of Inspection	Equipment ¹ Name (Emission Point #)	Leak Detected?	Method of Detection?	Location of Leak	Description of Leak	List each date a repair was attempted ²	Comments / Reason Repair Was Not Completed Within 15 Days	Date the repair was completed OR the target date ³
		(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)					

¹ 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 A full description of the repair(s) made and corrective action taken is to be documented on the Maintenance and Repair Log (Attachment D)

³ 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

ATTACHMENT I-1

Permit Conditions for Tanks Subject to 40 CFR 63 Subpart BBBBBB that elect to control emissions using an Internal Floating Roof according to the requirements of 40 CFR 63 Subpart WW

Table 1 to Subpart BBBBBB of Part 63 - Applicability Criteria, Emission Limits, and Management Practices for Storage Tanks: Scenario 2(d)(1) for an Internal Floating Roof Tank

Equipment / Procedural Requirements:

Internal Floating Roof, §63.11087 and §63.1063(a) & (b):

The permittee shall ensure that each internal floating roof gasoline storage tank meets the applicable requirements of §63.1063(a)(1) and (b). Each designated tank shall meet the following specifications for a fixed roof in combination with an internal floating roof:

- 1) Equip each designated internal floating roof tank (IFR) with one of the following rim seal configurations.
 - a) A liquid-mounted seal.
 - b) A mechanical shoe seal.
 - c) Two seals mounted one above the other. The lower seal may be vapor-mounted.
- 2) Each IFR must meet the following operational requirements:
 - a) The floating roof shall float on the stored liquid surface at all times, except when the floating roof is supported by its leg supports or other support devices (e.g., hangers from the fixed roof).
 - b) When the storage vessel is storing liquid, but the liquid depth is insufficient to float the floating roof, the process of filling to the point of refloating the floating roof shall be continuous and shall be performed as soon as practical.
 - c) Each cover over an opening in the floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall be closed at all times, except when the cover must be open for access.
 - d) Each automatic bleeder vent (vacuum breaker vent) and rim space vent shall be closed at all times, except when required to be open to relieve excess pressure or vacuum, in accordance with the manufacturer's design.
 - e) Each unslotted guidepole cap shall be closed at all times except when gauging the liquid level or taking liquid samples.

Monitoring / Recordkeeping Requirements:

Internal Floating Roof, §63.11092(e)(1), §63.11094(a), and §63.1063(c) & (d):

- 1) The permittee shall perform the following inspections as described in §63.1063(c)(1) for each internal floating roof tank that will comply with 40 CFR Part 63 Subpart BBBBBB using the methods described in 40 CFR Part 63 Subpart WW above. Internal floating roofs shall be inspected as follows:
 - a) Before the initial filling of the storage vessel, floating roof (IFR) inspections shall be conducted by visually inspecting the floating roof deck, deck fittings, and rim seals from within the storage vessel. The inspection may be performed entirely from the top side of the floating roof, as long as there is visual access to all deck components specified in **Equipment/Procedural Requirements, paragraph [1a]**, (i.e. §63.1063(a)(1)). Any of the conditions described below constitutes an inspection failure:
 1. Stored liquid on the floating roof.
 2. Holes or tears in the primary or secondary seal (if one is present).
 3. Floating roof deck, deck fittings, or rim seals that are not functioning as designed as specified in **Equipment/Procedural Requirements, paragraph [1b]** above, (i.e. §63.1063(a)).
 4. Failure to comply with the operational requirements of **Equipment/Procedural Requirements, paragraph [1b]** above, (i.e. §63.1063(b)).

5. Gaps of more than 0.32 centimeters ($\frac{1}{8}$ inch) between any deck fitting gasket, seal, or wiper required by **Equipment/Procedural Requirements, paragraph [1a]**, (i.e. §63.1063(a)(1)), and any surface that it is intended to seal.
 - b) The permittee shall perform subsequent inspections according to the following schedule:
 1. At least once per year a tank-top inspection shall be conducted on each IFR by visually inspecting the floating roof deck, deck fittings, and rim seal through openings in the fixed roof. Any of the conditions described in **paragraph [1a]**, **items 1 through 4**, of this section, (i.e. §63.1063(d)(1)(i) – (iv)), constitutes an inspection failure. Identification of holes or tears in the rim seal is required only for the seal that is visible from the top of the storage vessel.
 2. Each time the storage vessel is completely emptied and degassed, or every 10 years, whichever occurs first, the IFR shall be inspected as specified in **paragraph [1a]** of this section, (i.e. §63.1063(d)(1)).
 - c) Instead of the inspection frequency specified in **paragraph [1b]** above, (i.e.: §63.1063(c)(1)(i)), internal floating roof tanks with two rim seals may be inspected as specified in **paragraph [1a]** of this section, (i.e. §63.1063(d)(1)), each time the storage vessel is completely emptied and degassed, or every 5 years, whichever occurs first.
- 2) The permittee shall repair conditions causing inspection failures under **paragraph [1]** of this section as specified below:
 - a) If the inspection is performed while the storage vessel is not storing liquid, repairs shall be completed before the refilling of the storage vessel with liquid.
 - b) If the inspection is performed while the storage vessel is storing liquid, repairs shall be completed or the vessel removed from service within 45 days. If a repair cannot be completed and the vessel cannot be emptied within 45 days, the permittee may use up to 2 extensions of up to 30 additional days each. Documentation of a decision to use an extension shall include a description of the failure, shall document that alternate storage capacity is unavailable, and shall specify a schedule of actions that will ensure that the control equipment will be repaired or the vessel will be completely emptied as soon as practical.
 - 3) The permittee shall notify the Missouri Department of Natural Resources Air Pollution Control Program in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by **paragraph [1a]** of this section, (i.e. §63.1063(d)(1)), to afford the Department of Natural Resources the opportunity to have an observer present. If the inspection is not planned and the permittee could not have known about the inspection 30 days in advance or refilling the tank, the permittee shall notify the Department of Natural Resources at least 7 days before the inspection. 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 Department of Natural Resources at least 7 days prior to the refilling.
 - 4) The permittee shall keep a record of the dimensions of the storage vessel, an analysis of the capacity of the storage vessel, and an identification of the liquid stored for each storage tank.
 - 5) The permittee shall keep a record of each inspection performed as required by **paragraph [1]** above. 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). If the floating roof fails inspection, the record shall also include a description of all inspection failures, a description of all repairs and the dates that they were made, and the date that the storage vessel was removed from service, if applicable.

- 6) The permittee shall keep a record of the date when a floating roof is set on its legs or other support devices. The permittee shall also keep a record of the date when the roof was refloated, and the record shall indicate whether the process of refloating was continuous.
- 7) The permittee shall keep the documentation required by paragraph [2)b] of this section, (i.e. §63.1063(e)(2)), in the event that an extension is requested and/or used.
- 8) The permittee shall keep the records described in paragraph [4] above for as long as the liquid is stored or a minimum of 5 years, whichever is longer. The permittee shall keep the records described in paragraphs [5], [6], or [7] above for a minimum of 5 years. All records shall be kept in such a manner that they can be readily accessed within 24 hours. Records may be kept in hard copy or computer-readable form including, but not limited to, on paper, microfilm, computer, floppy disk, magnetic tape, or microfiche.
- 9) The permittee shall immediately make any records available to Missouri Department of Natural Resources' personnel upon request.

Reporting Requirements:

Notifications required by §63.11093 and §63.9 for 40 CFR Part 63, Subpart BBBBBB:

- 1) The permittee shall submit the following notifications to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 as applicable for each internal floating roof tank that will comply with 40 CFR Part 63 Subpart BBBBBB using the methods described in 40 CFR Part 63 Subpart WW:
 - a) The permittee shall submit an initial notification as specified in §63.9(b) to the Air Pollution Control Program which indicates that the installation is subject to 40 CFR Part 63 Subpart BBBBBB. For existing tanks the initial notification is due by May 9, 2008.
 - b) The permittee shall submit a Notification of Compliance Status as specified in §63.9(h). The Notification of Compliance Status must state which of the compliance options referenced in Table 1 to Subpart BBBBBB is used to comply with the subpart.
 - c) The permittee shall submit a written Notification of Performance Test as specified in §63.9(e) prior to initiating testing intended to demonstrate compliance with the compliance option selected. The Notification must be submitted at least 60 calendar days before the performance test is scheduled to begin to allow the Missouri Department of Natural Resources, Air Pollution Control Program to review and approve the site-specific test plan required under §63.7(c), if requested by the Department of Natural Resources, and to have an observer present during the test.
 - d) The permittee shall submit additional notifications specified in §63.9, as applicable.

Reports required for Internal Floating Roof Tanks by §63.11095(a)(1) and §63.1066:

- 2) The permittee shall submit the following reports to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 as applicable for each internal floating roof tank that will comply with 40 CFR Part 63 Subpart BBBBBB using the methods described in 40 CFR Part 63 Subpart WW:
 - a) After installing the internal floating roof as described in Equipment/Procedural Requirements above, the permittee shall submit a report to the Air Pollution Control Program that describes the control equipment and certifies that the control equipment meets the specifications of §63.1063(a)(1), §63.1063(b), and §63.1063(c). The report shall be postmarked within 15 days after the actual date of initial startup of the tank as equipped with the control equipment that meets the specifications.
 - b) If inspection failures described in Monitoring/Recordkeeping Requirements, paragraphs [1)a), b), or c)], (i.e. §63.1063(c) and (d)), are detected, the permittee shall submit a copy of the inspection record to the Air Pollution Control Program within 30 days of the inspection. The

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. The report shall also include any extensions requested and/or used under **Monitoring/Recordkeeping Requirements, paragraph [2)b]**, (i.e. §63.1063(e)(2)).

General, All:

- 3) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

ATTACHMENT I-2

Permit Conditions for Tanks Subject to 40 CFR 63 Subpart BBBBBB that elect to control emissions using a Closed Vent System and Control Device To Reduce Emissions By 95%

Table 1 to Subpart BBBBBB of Part 63 - Applicability Criteria, Emission Limits, and Management Practices for Storage Tanks: Scenario 2(a)

Equipment / Procedural Requirements:

Closed Vent System and Control Device, §63.11087, §63.11092(d) and §60.112b(a)(3):

- 1) The permittee shall reduce emissions of total organic HAP or TOC by 95 weight-percent using a closed vent system and control device as specified by §60.112b(a)(3) as follows:
 - a) The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel. The system shall be operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in §60.485(b).
 - b) The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater. If a flare is used as the control device, it shall meet the specifications described in the general control device requirements in §60.18.
- 2) The permittee shall comply with the following requirements:
 - a) Operate the vapor processing system in a manner not to exceed or not to go below, as appropriate, the operating parameter value for the parameters described in **Monitoring/Testing Requirements, paragraph [2)a]**, below, (i.e. §63.11092(b)(1)).
 - b) In cases where an alternative parameter pursuant to **Monitoring/Testing Requirements, paragraphs [2)a]4.] or [2)e]1.]**, below is approved, (i.e. §63.11092(b)(1)(iv) or §63.11092(b)(5)(i)), 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.
 - c) 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), i.e. to reduce emissions of total organic HAP or TOC by 95 weight-percent, except as specified in **paragraph [2)d]** below.
 - d) For the monitoring and inspection, as required under **Monitoring/Testing Requirements, paragraphs [2)a]1.b)] and [2)a]3.b)]**, below, (i.e. §63.11092 (b)(1)(i)(B)(2) and (b)(1)(iii)(B)(2)), malfunctions that are discovered shall not constitute a violation of the emission standard in §63.11088(a), i.e. to reduce emissions of total organic HAP or TOC by 95 weight-percent, if corrective actions as described in the monitoring and inspection plan are followed. The permittee must:
 1. Initiate corrective action to determine the cause of the problem within 1 hour;
 2. Initiate corrective action to fix the problem within 24 hours;
 3. Complete all corrective actions needed to fix the problem as soon as practicable consistent with good air pollution control practices for minimizing emissions;
 4. Minimize periods of start-up, shutdown, or malfunction; and
 5. Take any necessary corrective actions to restore normal operation and prevent the recurrence of the cause of the problem.

Monitoring/Testing Requirements:

Closed Vent System and Control Device, §63.11092(e)(3) and §63.11092 (a) through (c):

- 1) The permittee shall conduct a performance test and determine a monitored operating parameter value in accordance with the requirements in **paragraphs [1] through [4]** of this section, (i.e. §63.11092(a) through (d)).

- a) Conduct a performance test on the vapor processing and collection systems according to either of the following:
 1. Use the test methods and procedures in §60.503 of this chapter, except a reading of 500 parts per million shall be used to determine the level of leaks to be repaired under §60.503(b) of this chapter.
 2. Use alternative test methods and procedures in accordance with the alternative test method requirements in §63.7(f).
 - b) The permittee may submit a statement by a responsible official certifying the compliance status of the emission unit in lieu of the test required under paragraph [1a)] of this section if the permittee is operating the emission unit in compliance with an enforceable State, local, or tribal rule or permit that requires closed vent and control device system to meet an emission reduction of 95-percent.
 - c) If the permittee has conducted performance testing on the vapor processing and collection systems within 5 years prior to January 10, 2008, and the test is for the affected facility and is representative of current or anticipated operating processes and conditions, the permittee may submit the results of such testing in lieu of the test required under paragraph [1a)] of this section, provided the testing was conducted using the test methods and procedures in §60.503 of this chapter. Should the Director deem the prior test data unacceptable, the facility is still required to meet the requirement to conduct an initial performance test within 180 days of the compliance date specified in §63.11083.
 - d) The performance test requirements of paragraph [1a)] do not apply to flares defined in §63.11100, i.e. a thermal oxidation system using an open (without enclosure) flame, and meeting the flare requirements in §63.11(b). The permittee shall demonstrate that the flare and associated vapor collection system is in compliance with the requirements in §63.11(b) and §60.503(a), (b), and (d).
- 2) For each performance test conducted under paragraph [1a)] of this section, the permittee shall determine a monitored operating parameter value for the vapor processing system using the procedures specified in paragraphs [2a)] through [2e)] below, (i.e. §63.11092(b)(1) through b(5)).
- a) The permittee shall install, calibrate, certify, operate, and maintain, according to the manufacturer's specifications, a continuous monitoring system (CMS) while gasoline vapors are displaced to the vapor processor systems specified in paragraphs [2a)1.] through [2a)4.] of this section, (i.e. §63.11092(b)(1)(i) through (iv)). During the performance test, continuously record the operating parameter as specified under paragraphs [2a)1.] through [2a)4.] of this section, (i.e. §63.11092(b)(1)(i) through (iv)).
 1. Where a carbon adsorption system is used, the permittee shall monitor the operation of the system as specified in the following, paragraphs [2a)1.i] or [2a)1.ii.]:
 - i. A continuous emissions monitoring system (CEMS) capable of measuring organic compound concentration shall be installed in the exhaust air stream.
 - ii. As an alternative to the CEMS described above, the permittee may choose to meet the following requirements:
 - a) Monitor carbon adsorption devices as follows:
 - 1) Vacuum level shall be monitored using a pressure transmitter installed in the vacuum pump suction line, with the measurements displayed on a gauge that can be visually observed. Each carbon bed shall be observed during one complete regeneration cycle on each day of operation of the loading rack to determine the maximum vacuum level achieved.
 - 2) Conduct annual testing of the carbon activity for the carbon in each carbon bed. Carbon activity shall be tested in accordance with the butane working capacity

test of the American Society for Testing and Materials (ASTM) Method D 5228-92 (incorporated by reference, see §63.14), or by another suitable procedure as recommended by the manufacturer.

- 3) Conduct monthly measurements of the carbon bed outlet volatile organic compounds (VOC) concentration over the last 5 minutes of an adsorption cycle for each carbon bed, documenting the highest measured VOC concentration. Measurements shall be made using a portable analyzer, in accordance with 40 CFR Part 60, Appendix A-7, EPA Method 21 for open-ended lines.
- b) Develop and submit to the Air Pollution Control Program a monitoring and inspection plan that describes the permittee's approach for meeting the following requirements:
 - 1) The lowest maximum required vacuum level and duration needed to assure regeneration of the carbon beds shall be determined by an engineering analysis or from the manufacturer's recommendation and shall be documented in the monitoring and inspection plan.
 - 2) The permittee shall verify, during each day of operation of the loading rack, the proper valve sequencing, cycle time, gasoline flow, purge air flow, and operating temperatures. Verification shall be through visual observation or through an automated alarm or shutdown system that monitors and records system operation.
 - 3) The permittee shall perform semi-annual preventive maintenance inspections of the carbon adsorption system according to the recommendations of the manufacturer of the system.
 - 4) The monitoring plan developed under this section shall specify conditions that would be considered malfunctions of the carbon adsorption system during the inspections or automated monitoring performed under paragraphs [2)a)1.ii.b)1] through [2)a)1.ii.b)3] of this section, describe specific corrective actions that will be taken to correct any malfunction, and define what the permittee would consider to be a timely repair for each potential malfunction.
 - 5) The permittee shall document the maximum vacuum level observed on each carbon bed from each daily inspection and the maximum VOC concentration observed from each carbon bed on each monthly inspection as well as any system malfunction, as defined in the monitoring and inspection plan, and any activation of the automated alarm or shutdown system with a written entry into a log book or other permanent form of record. Such record shall also include a description of the corrective action taken and whether such corrective actions were taken in a timely manner, as defined in the monitoring and inspection plan, as well as an estimate of the amount of gasoline loaded during the period of the malfunction.
2. Where a refrigeration condenser system is used, a continuous parameter monitoring system (CPMS) capable of measuring temperature shall be installed immediately downstream from the outlet to the condenser section. Alternatively, a CEMS capable of measuring organic compound concentration may be installed in the exhaust air stream.
3. Where a thermal oxidation system other than a flare is used, the permittee shall monitor the operation of the system as specified in the following paragraphs:
 - i. A CPMS capable of measuring temperature shall be installed in the firebox or in the ductwork immediately downstream from the firebox in a position before any substantial heat exchange occurs.
 - ii. As an alternative to the CPMS described above, the permittee may choose to meet the following requirements:

- a) The presence of a thermal oxidation system pilot flame shall be monitored using a heat-sensing device, such as an ultraviolet beam sensor or a thermocouple, installed in proximity to the pilot light to indicate the presence of a flame.
- b) Develop and submit to the Air Pollution Control Program a monitoring and inspection plan that describes the permittee's approach for meeting the following requirements:
 - 1) The thermal oxidation system shall be equipped to automatically prevent gasoline loading operations from beginning at any time that the pilot flame is absent.
 - 2) The permittee shall verify, during each day of operation of the loading rack, the proper operation of the assist-air blower, the vapor line valve, and the emergency shutdown system. Verification shall be through visual observation or through an automated alarm or shutdown system that monitors and records system operation.
 - 3) The permittee shall perform semi-annual preventive maintenance inspections of the thermal oxidation system according to the recommendations of the manufacturer of the system.
 - 4) The monitoring plan developed under this section shall specify conditions that would be considered malfunctions of the thermal oxidation system during the inspections or automated monitoring performed under paragraphs (ii) and (iii) of this section, describe specific corrective actions that will be taken to correct any malfunction, and define what the permittee would consider to be a timely repair for each potential malfunction.
 - 5) The permittee shall document any system malfunction, as defined in the monitoring and inspection plan, and any activation of the automated alarm or shutdown system with a written entry into a log book or other permanent form of record. Such record shall also include a description of the corrective action taken and whether such corrective actions were taken in a timely manner, as defined in the monitoring and inspection plan, as well as an estimate of the amount of gasoline loaded during the period of the malfunction.
4. Monitoring an alternative operating parameter or a parameter of a vapor processing system other than those listed in paragraphs [2)a)1.] through [2)a)3.] of this section, (i.e. §63.11092(b)(1)(i) through (iii)), will be allowed upon demonstrating to the Director's satisfaction that the alternative parameter demonstrates continuous compliance with the emission standard in §63.11088(a), i.e. to reduce emissions of total organic HAP or TOC by 95 weight-percent.
 - b) Where a flare meeting the requirements in §63.11(b) is used, a heat-sensing device, such as an ultraviolet beam sensor or a thermocouple, must be installed in proximity to the pilot light to indicate the presence of a flame.
 - c) Determine an operating parameter value based on the parameter data monitored during the performance test, supplemented by engineering assessments and the manufacturer's recommendations.
 - d) 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), i.e. to reduce emissions of total organic HAP or TOC by 95 weight-percent.
 - e) If the permittee has chosen to comply with the performance testing alternatives provided under paragraph [1)b)] or [1)c)] of this section, (i.e. §63.11092(a)(2) or (a)(3)), the monitored operating parameter value may be determined according to the following provisions:

1. Monitor an operating parameter that has been approved by the Air Pollution Control Program and is specified in your facility's current enforceable operating permit. At the time that the Department of Natural Resources requires a new performance test, you must determine the monitored operating parameter value according to the requirements specified in paragraphs [2)a] through [2)c] of this section, (i.e. §63.11092(b)).
2. Determine an operating parameter value based on engineering assessment and the manufacturer's recommendation and submit the information specified in paragraph [2)d] of this section, (i.e. §63.11092(b)(4)), for approval by the Air Pollution Control Program. 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 paragraphs [2)a] through [2)d] of this section, (i.e. §63.11092(b)).
- 3) For performance tests performed after the initial test required under paragraph [1] of this section, (i.e. §63.11092(a)), the permittee shall document the reasons for any change in the operating parameter value since the previous performance test.

Recordkeeping Requirements:

Closed Vent System and Control Device, §63.11094(a), §63.11094(f) and §60.115b(c):

- 1) The permittee shall keep records as specified in §60.115b.
 - a) After installing a closed vent system and control device other than a flare in accordance with §60.112b (a)(3) or (b)(1), the permittee shall keep the following records:
 1. A copy of the operating plan.
 2. A record of the measured values for all parameters that were monitored to document compliance with the permit condition.
 - b) After installing a closed vent system and flare to comply with §60.112b, the permittee shall maintain records of all periods of operation during which the flare pilot flame is absent.
- 2) The permittee shall maintain the up-to-date and readily available records of the following items associated with the continuous parameter monitoring system:
 - a) The continuous monitoring data required in Monitoring/Testing Requirements, paragraph [2] above. The date and time of day shall be indicated at reasonable intervals on this record.
 - b) The monitoring and inspection plan described in Monitoring/Testing Requirements, paragraph [2)a)1.ii)b) or [2)a)3.ii)b), above.
 - c) A record of all system malfunctions, as specified in Monitoring/Testing Requirements, paragraph [2)a)1.ii)b)5) or [2)a)3.ii)b)5), above.
- 3) The permittee shall maintain a record of all data and calculations, engineering assessments, and manufacturer's recommendations used in determining the operating parameter value described in Monitoring/Testing Requirements, paragraphs [2)c)], [2)d)] or [2)e)], above. These records shall be maintained on file for a minimum of 5 years, or until a new performance test is conducted and approved by the Director, whichever is longer.
- 4) 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 to the Missouri Department of Natural Resources, Air Pollution Control Program. The Director will specify appropriate reporting and recordkeeping requirements as part of the review of the permit application.
- 5) The permittee shall maintain records of any performance tests on file for a minimum of 5 years or until another performance test is performed, whichever is longer.
- 6) The permittee shall maintain any additional records specified by §63.10(b).
- 7) The permittee shall keep all records for a minimum of 5 years unless a longer period is specified with the requirement. All records shall be kept in such a manner that they can be readily accessed

within 24 hours. Records may be kept in hard copy or computer-readable form including, but not limited to, on paper, microfilm, computer, floppy disk, magnetic tape, or microfiche.

- 8) The permittee shall immediately make any records available to Missouri Department of Natural Resources' personnel upon request.

Reporting Requirements:

Notifications required by §63.11093 and §63.9 for 40 CFR Part 63, Subpart BBBBBB:

- 1) The permittee shall submit the following notifications to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 as applicable for each external floating roof tank that will comply with 40 CFR Part 63 Subpart BBBBBB using a closed vent and control device described in 40 CFR Part 60 Subpart Kb:
 - a) The permittee shall submit an initial notification as specified in §63.9(b) to the Air Pollution Control Program which indicates that the installation is subject to 40 CFR Part 63 Subpart BBBBBB. For existing tanks the initial notification is due by May 9, 2008.
 - b) The permittee shall submit a Notification of Compliance Status as specified in §63.9(h). The Notification of Compliance Status must state which of the compliance options referenced in Table 1 to Subpart BBBBBB is used to comply with the subpart.
 - c) The permittee shall submit a written Notification of Performance Test as specified in §69.9(e) prior to initiating testing intended to demonstrate compliance with the compliance option selected. The Notification must be submitted at least 60 calendar days before the performance test is scheduled to begin to allow the Missouri Department of Natural Resources, Air Pollution Control Program to review and approve the site-specific test plan required under §63.7(c), if requested by the Department of Natural Resources, and to have an observer present during the test.
 - d) The permittee shall submit additional notifications specified in §63.9, as applicable.

Reports required for a Closed Vent System and Control Device by §63.11095(a)(1) and §60.115b(d):

- 2) After installing a closed vent system and flare to comply with §60.112b, the permittee shall submit the following reports:
 - a) A report containing the measurements required by §60.18(f) (1), (2), (3), (4), (5), and (6) shall be furnished to the Air Pollution Control Program as required by §60.8 of the General Provisions. This report shall be submitted within 6 months of the initial start-up date.
 - b) Annual reports of all periods recorded under **Recordkeeping Requirements, paragraph [2]** above in which the pilot flame was absent shall be furnished to the Air Pollution Control Program.

General, All:

- 3) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C. (III) and Section V of this permit.

ATTACHMENT J
Compliance Assurance Monitoring Plan

Flare Monitoring	Indicator No. 1
I. Indicator	Presence of Flame
Monitoring Approach	Flame presence is monitored using an ultraviolet flame detector (UFD). {Operations Note. After a tanker truck is hooked up at the loading rack, a remote signal is sent to the flare programmable logic controller (PLC) to automatically ignite the pilot flame. If a pilot flame is not detected by the UFD after the fifth automatic ignition trial, the PLC will shut down the combustion system due to pilot failure. After the UFD verifies that a flame is present, a green light is on in the operator's office. If the UFD signal is lost during loading, the loading rack automatically shuts down and the green light is off}.
II. Indicator Range	An excursion occurred whenever the UFD signal is lost during loading (i.e. the flame is absent) resulting in an automatic shutoff at the loading rack, making loading impossible.
QIP threshold	Not more than 6 excursions in any semi-annual reporting period
III. Performance Criteria	
A. Data Representativeness	The UFD is wired into the stack to detect the presence of the flame.
B. Verification of Operational Status	A green light in operator's office is on whenever the UFD detects the presence of a flame.
C. QA/QC Practices and Criteria	Manufacturer's routine maintenance requirements include keeping the flame detection system adjusted for the smoothest, most reliable operation, and ensuring that the flame signal current is above the manufacturer's minimum acceptable level.
D. Monitoring Frequency	The UFD operates continuously, when the flare is operating.
E. Data Collection Procedures	The UFD continuously senses the ultraviolet radiation emitted by the combustion flames and generates an current (microamps) signal to the PLC.
F. Averaging Period	NA

<u>Loading Rack Bypass Monitoring</u>	Indicator No. 2
I. Indicator	Magnehelic Pressure Gauge at the Loading Rack
Monitoring Approach	This gauge records the hydrocarbon vapor pressure in the

	<p>pipings, which conveys vapors to the flare for processing. At pressures greater than 18 inches W.C., a pressure relief valve opens and vent vapor emissions (i.e. bypassing the collection system).</p>
II. Indicator Range	<p>An excursion is defined when the reading on the gauge exceeds 11 inches W.C. (Note: Formal testing on November 18, 2002 indicates loading pressures up to 11 inches W.C. without activating the relief valve).</p>
QIP threshold	Not more than 6 excursions in any semi-annual reporting period.
III. Performance Criteria	
A. Data Representativeness	The Magnehelic gauge is connected to the gas flow line.
B. Verification of Operational Status	The operator routinely checks the gauge in accordance with the manufacturer's recommendation.
C. QA/QC Practices and Criteria	Calibration and accuracy verification is conducted in accordance with the manufacturer's recommendation at least once a year.
D. Monitoring Frequency	Operators shall monitor the reading on the gauge, the number of tanker trucks loading, and the status of the pressure relief valve (i.e. open or shut).
E. Data Collection Procedures	Operator monitors the gauge and associated equipment.
F. Averaging Period	NA

STATEMENT OF BASIS

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) Part 70 Operating Permit Application, received August 4, 2004; revisions received October 20, 2008;
- 2) 2006 Emissions Inventory Questionnaire, received May 18, 2007;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) United States Environmental Protection Agency document Gasoline Distribution Industry (Stage I) Background Information for Promulgated Standards Final EIS (EPA-453/R-94-002b), Chapter 7.0 Cargo Tank Requirements, Section 7.1 Emission Factors; and
- 5) MDNR approval that TransMontaigne is no longer subject to the National Emission Standard for Hazardous Air Pollutants for GDFs, 40 CFR Part 63, Subpart R, dated August 3, 2009.

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.

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

This rule was checked as not applicable to the installation in the application for the reason “K”, “Other”. However, the rule is now included in the Core Permit Requirements and emission unit specific permit conditions were added to vapor disposal unit associated with the loading racks, in permit condition EU0010-003.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-6.080, *Emission Standards for Hazardous Air Pollutants*

10 CSR 10-6.250, *Asbestos Projects-Certification, Accreditation and Business Exemption Requirements*

These rules were determined to be not applicable because there is no indication that the installation is currently handling asbestos. See the further discussion under “National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability” of this Statement of Basis.

10 CSR 10-6.100, *Alternate Emission Limits*

This rule is not applicable because the installation is in an ozone attainment area.

Construction Permit Revisions

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

- 1) Construction Permit #0697-013, Issued July 25, 1997: Permit conditions 1 – 3 described a requirement that Razorback Pipeline, Inc. shall not pull more than 50% of the total petroleum

product to be stored in their bulk storage tanks from Conoco Inc.'s tanks or ship more than 50% of the total product stored in Razorback Pipeline, Inc. storage tanks to Conoco Inc.'s storage tanks. Razorback Pipeline was previously a joint venture between Conoco Inc. and TransMontaigne Pipeline. As per the additional documentation supplied by TransMontaigne on October 20, 2008, TransMontaigne purchased the ConocoPhillips portion of the joint venture several years ago and there is no longer any connection between the two facilities. Therefore, permit conditions 1 – 3 were omitted from this operating permit because they are no longer applicable.

- 2) Construction Permit #0697-014, Issued July 25, 1997: Permit conditions 1 – 4 and 6 which required a performance test to be completed within 60 days after construction of the loading rack is complete were not included in this operating permit since the performance test has been completed. The general requirements for performance testing are included in EU0010-002 in the event that the installation wishes to conduct a subsequent performance test.
- 3) Construction Permit #0698-015, Issued June 1, 1998: Under Applicable Requirements, item III stated that 40 CFR Part 60 Subpart Kb was applicable to the 15,000 gallon storage tank (now EU0080). At the time that the permit was issued, Subpart Kb contained recordkeeping requirements for tanks between 40 m³ and 75 m³ in capacity, which included this tank. Subpart Kb was amended effective October 15, 2003 to be applicable on to storage tanks with a capacity of greater than or equal to 75 m³. Therefore, Subpart Kb is no longer applicable to EU0080, the 15,000 gallon ethanol storage tank and no permit conditions were included in this operating permit.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart K – *Storage vessels for Petroleum Liquids which construction, reconstruction or Modification started between (6/11/73 – 5/19/78)*

This rule was determined not to be applicable to the installation because no existing tanks were installed, reconstructed, or modified during the time period covered.

40 CFR Part 60, Subpart Ka – *Storage vessels for Petroleum Liquids which construction, reconstruction or Modification started between 5/19/78 – 7/23/84*

This rule was determined not to be applicable to the installation because no existing tanks were installed, reconstructed, or modified during the time period covered.

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*

- 1) This rule was determined to be applicable to EU0020 and EU0025 [Tanks #1 and 5]. Both tanks were constructed after July 23, 1984, are currently equipped with internal floating roofs, and have a capacity greater than 151 m³ (39,890 gallons). These tanks may be used to store gasoline, which has a vapor pressure greater than or equal to 3.5 kilopascals (kPa).
 - a) Permit Conditions EU0020-001 and EU0025-001 include provisions for the requirements of Subpart Kb that are specific to internal floating roof tanks, i.e. 40 CFR 60.112b(a)(1), 60.113b(a), and 60.115b(a) because these tanks are currently equipped with internal floating roofs.

- b) The installation has the option to control emissions from these tanks through alternate means, as described in 40 CFR 60.112(b)(a)(3) and (4). However, since the installation is not currently using alternate means of control, Permit Conditions EU0020-001 and EU0025-001 reference these alternate options only and do not include detailed operating, monitoring, testing, or recordkeeping conditions for these options. These conditions are included in Attachment I-2.
 - c) Permit conditions EU0020-001 and EU0025-001 include the restriction from 40 CFR 60.112b(b) prohibiting storing volatile organic liquids with a vapor pressure of greater than or equal to 76.6 kPa (11.1 psia) because these tanks are not equipped with a closed vent and control system or equivalent. Although it is unlikely, a gasoline product handled by the installation could have a vapor pressure greater than or equal to 11.1 psia at storage temperatures greater than 80 °F. Therefore, the monitoring requirements of 40 CFR 116b(c) were included as item 2 under Monitoring / Recordkeeping Requirements and an example form included in Attachment F.
 - d) These tanks are also subject to the Maximum Available Control Technology (MACT) requirements of 40 CFR Part 63 Subpart BBBBBB. The recordkeeping conditions of 40 CFR 60.116b(a) were modified to require records to be maintained for a minimum of 5 years, the more stringent requirement specified in the MACT rule.
- 2) This rule was determined not to be applicable to EU0050, EU0060 or EU0065 [Tanks #2, #3 and #4], although each tank is greater than 75m³ in capacity, for the following reasons:
- a) Each tank was originally constructed prior to July 23, 1984.
 - b) No changes have been made to the tanks that have met the definition of a modification since no change has resulted in an increase in the amount of pollutants emitted and no new pollutants have been emitted.
 - c) No changes have been made to the tanks that have met the definition of a reconstruction since the cost has been less than 50% of the cost of a replacement.
 - d) As discussed below under “Maximum Available Control Technology (MACT) Applicability”, these emission units are subject to 40 CFR Part 63, Subpart BBBBBB, which references the control requirements for storage tanks found 40 CFR Part 60, Subpart Kb. However, the use of 40 CFR Part 60, Subpart Kb for the purpose of compliance with 40 CFR Part 63, Subpart BBBBBB is included under the discussion of MACT Applicability for Subpart BBBBBB and was not determined to cause the EU0050, EU0060 or EU0065 tanks to be subject to Subpart Kb.
- 3) This rule was determined not to be applicable EU0030 [Tanks #7, #8 and #9] because these tanks were constructed prior to July 23, 1984 and are less than 75 m³ in capacity.
- 4) This rule was determined not to be applicable EU0070 or EU0080 [Tanks #10 and #11]. Although both tanks were constructed after July 23, 1984, each tank is less than 75 m³ in capacity.
- 5) This rule was determined not to be applicable to EU0090 [Tank #12]. Although this tank was constructed after July 23, 1984, it is less than 75 m³ in capacity. It will hold primarily water, with small amounts of other products, and hence will not be used to store volatile organic compounds.

40 CFR Part 60 Subpart XX – *Standards of Performance for Bulk Gasoline Terminals*

- 1) This rule was determined to be applicable EU0010 [2-Bay Loading Rack]. The Loading Rack was modified in 1997 and a vapor destruction unit (VDU) was also added at this time. The construction permit determined that this modification caused the loading rack to be subject to the New Source Performance Requirements of this rule. The installation is also subject to 40 CFR Part 63 Subpart BBBBBB, so the installation is required to comply with the provisions in each subpart that contain

the most stringent control requirements for the emission unit. The requirements for both rules were incorporated into permit condition EU0010-002.

- a) Under the terms of the previous operating permit (OP2000-073), the installation was determined to be subject to the Maximum Available Control Technology requirements of 40 CFR Part 63 Subpart R in addition to the requirements of Part 60 Subpart XX. Because of this, the installation was required to meet the more stringent emission limit from §63.422 of 10 milligrams of total organic compounds per liter of gasoline loaded (10 mg TOC / liter of gasoline loaded). The installation conducted a performance test of the VDU on October 19, 2000 which demonstrated compliance with this emission limit and has been operating in compliance with the limit since that time.

During the preparation of the current operating permit, the installation requested and was granted approval to instead be subject to the Maximum Available Control Technology requirements of 40 CFR Part 63 Subpart BBBBBB. This rule establishes an emission limit of 80 mg TOC / liter of gasoline loaded. Therefore, the more stringent emission limit from 40 CFR Part 60 Subpart XX of 35 mg TOC / liter of gasoline loaded would now be applicable.

However, the installation has voluntarily agreed to continue to operate the VDU in compliance with the operating parameters established during the October 19, 2000 performance test and to continue to comply with an emission limit of 10 mg TOC / liter of gasoline loaded.

- b) The loading rack is currently equipped with a John Zink Model FT-2-8-35-X-2/8 vapor combustion unit. This unit is an enclosed flare but it is classified as a thermal oxidation system and not as a flare. Therefore, permit condition EU0010-002 does not include provisions for the requirements of Subpart XX that are specific to flares.
- c) Construction permit #0697-014, issued July 25, 1997, included requirements concerning the use of an ultraviolet (UV) scanner to indicate that the VDU is operational. This monitoring condition, along with the associated compliance assurance monitoring requirements, were included in permit condition EU0010-001.
- d) The recordkeeping conditions of §60.505(c), (d), and (f) were modified to require records to be maintained for a minimum of 5 years, the more stringent requirement specified in 40 CFR Part 63 Subpart BBBBBB.
- e) The leak inspection requirements of §60.502(j) were determined to overlap with the leak inspection requirements of 40 CFR Part 63 Subpart BBBBBB. Therefore both requirements were incorporated as a plant-wide emission limitation for all equipment in gasoline service, permit condition PW003.

Maximum Available Control Technology (MACT) Applicability

40 CFR Part 63 Subpart R – *National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)*

This rule was determined not to be applicable to the installation because it is not a major source of hazardous air pollutants (HAPs).

The Statement of Basis for the previous operating permit (OP2000-073) stated that the installation's potential to emit VOC and HAPs was less than major source thresholds. The installation consists of a

bulk gasoline terminal and the Razorback Pipeline which delivers product to a TransMontaigne facility located in Rogers, Arkansas. At the time that OP2000-073 was issued, the Razorback Pipeline was operated as a joint venture with ConocoPhillips and the installation had the ability to pipe product to and from a contiguous facility, the ConocoPhillips Corporation terminal in Mt. Vernon, MO, facility ID 109-0036. This arrangement was interpreted to deem the installation to be “located within a contiguous area and under common control with another bulk gasoline terminal” and Subpart R was determined to be applicable to both installations.

Since the last permit, the installation has purchased the ConocoPhillips portion of the pipeline. The interconnections allowing transfer of product between the two terminals are no longer being used and have been removed. The installation requested approval to instead be subject to the Maximum Available Control Technology requirements of 40 CFR Part 63 Subpart BBBBBB. Approval was granted on August 3, 2009 and the installation has now been determined not to be subject to 40 CFR Part 63 Subpart R since it was not, and had not historically been, a major source of HAP.

The following calculations and tables demonstrate that the facility’s potential to emit is less than the major source threshold for HAPs.

- 1) The maximum throughput for gasoline was determined as follows:
 - a) There are two loading arms, one for each truck bay. Each truck bay can accommodate a maximum of four trucks per hour while loading gasoline. Each truck holds a maximum of 8,000 gallons. Therefore, the maximum amount of gasoline which can be handled by the loading racks is calculated to be:
$$2 \text{ (truck bays)} \times 4 \text{ (trucks/bay/hour)} \times 8,000 \text{ (gallons/truck)} \times 8,760 \text{ (hours/year)} = 560,640,000$$
gallons of gasoline per year.
 - b) As per permit condition PW001, the installation can also ship a maximum of 350,000,000 gallons of any mixture of gasoline or distillate via their pipeline to an installation located in Rogers, AR. Therefore, the maximum amount of gasoline that can be stored in the installation’s storage tanks is:
$$560,640,000 \text{ (gallons gasoline shipped via loading racks)} + 350,000,000 \text{ (gallons gasoline shipped via the pipeline)} = 910,640,000$$
gallons gasoline per year.
 - c) For the purposes of determining maximum potential to emit, the maximum throughput for each of the five product storage tanks was allocated based on the tank’s capacity. The aggregate storage capacity of these tanks is 8,988,000 gallons. For example, the amount allocated to EU0020, Tank #1, is:
$$910,640,000 \text{ (gallons gasoline per year)} \times 1,512,000 \text{ (gallons capacity)} / 8,988,000 \text{ (gallons aggregate storage capacity)} = 153,191,776$$
gallons gasoline stored in EU0020 per year.
- 2) The maximum throughput for diesel was determined as follows:
 - a) There are two loading arms, one for each truck bay. Each truck bay can accommodate a maximum of three trucks per hour while loading diesel. Each truck holds a maximum of 8,000 gallons. Therefore, the maximum amount of diesel which can be handled by the loading racks is:
$$2 \text{ (truck bays)} \times 3 \text{ (trucks/bay/hour)} \times 8,000 \text{ (gallons/truck)} \times 8,760 \text{ (hours/year)} = 420,480,000$$
gallons of diesel per year.
 - b) As per permit condition PW003, the installation can also ship a maximum of 350,000,000 gallons of any mixture of gasoline or distillate via their pipeline to an installation located in

Rogers, AR. Therefore, the maximum amount of diesel that can be stored in the installation's storage tanks is:

$$420,480,000 \text{ (gallons diesel shipped via loading racks)} + 350,000,000 \text{ (gallons diesel shipped via the pipeline)} = 770,480,000 \text{ gallons per year.}$$

- c) For the purposes of determining maximum potential to emit, the maximum throughput for each of the five product storage tanks was allocated based on the tank's capacity. The aggregate storage capacity of these tanks is 8,988,000 gallons. For example, the amount allocated to EU0020, Tank #1, is:

$$770,480,000 \text{ (gallons diesel per year)} \times 1,512,000 \text{ (gallons capacity)} / 8,988,000 \text{ (gallons aggregate storage capacity)} = 129,613,458 \text{ gallons diesel stored in EU0020 per year.}$$

- 3) The maximum throughput for the EU0030 additive tanks was determined as follows:

- a) Tank #7 additives are loaded via the loading rack at a rate of 0.3700 gallons additive / 1,000 gallons of gasoline. This calculates to:

$$0.3700 \text{ (gallons additive/1,000 gallons gasoline)} \times 5,640,000 \text{ (gallons gasoline loaded per year)} = 207,437 \text{ gallons additive per year.}$$

- b) Tank #8 additives are loaded via the loading rack at a rate of 0.1471 gallons additive / 1,000 gallons of gasoline. This calculates to:

$$0.1471 \text{ (gallons additive/1,000 gallons gasoline)} \times 5,640,000 \text{ (gallons gasoline loaded per year)} = 82,470 \text{ gallons additive per year.}$$

- c) Tank #9 additives are loaded via the loading rack at a rate of 0.0528 gallons additive / 1,000 gallons of diesel. This calculates to:

$$0.0528 \text{ (gallons additive/1,000 gallons diesel)} \times 420,480,000 \text{ (gallons diesel loaded per year)} = 22,201 \text{ gallons additive per year.}$$

- 4) The maximum throughput for Tank #10 (EU0070) is based on Construction Permit 0697-013, condition #4, which limits the throughput to 365 barrels of any petroleum product in any consecutive 12-month period. This converts to 15,330 gallons.

- 5) The maximum product throughput for each emission unit is presented in Tables 1 and 2:

TABLE 1 – Maximum Potential Throughput for Each Storage Tank

Emission Unit	Equipment Name	Equipment Specifications			Maximum Potential Throughput (gallons/year)	
		Tank Dimensions H x D (ft)	Capacity (gallons)	Roof Type	Gasoline	Diesel (Distillate #2)
EU0020	Tank #1	40 x 80	1,512,000	Internal Floating Roof	153,191,776	129,613,458
EU0050	Tank #2	50 x 50	714,000	Internal Floating Roof	72,340,561	61,206,355
EU0060	Tank #3	48 x 60	966,000	Domed External Floating Roof	97,872,523	82,808,598
EU0065	Tank #4	48 x 60	966,000	Domed External Floating Roof	97,872,523	82,808,598
EU0025	Tank #5	49 x 130	4,830,000	Internal Floating Roof	489,362,617	414,042,991
Total:					910,640,000	420,480,000
EU0030	Tank #7	12 x 5.5	2,142	Horizontal Fixed Roof	Additive: 207,437	
EU0030	Tank #8	12 x 5.5	2,142	Horizontal Fixed Roof	Additive: 82,470	
EU0030	Tank #9	6 x 4	546	Horizontal Fixed Roof	Additive: 22,201	
EU0070	Tank #10	8 x 3	300	Horizontal Fixed Roof	Transmix: 15,330	
EU0080	Tank #11	28 x 10	15,000	Horizontal Fixed Roof	Ethanol: 4,000,000	

TABLE 2 – Maximum Potential Throughput for Loading Racks and Piping

Emission Unit	Equipment Name	Description	Maximum Potential Throughput (gallons/year)	
			Gasoline	Diesel (Distillate #2)
EU0010	Loading Rack	2-Bay Loading Rack, used for loading gasoline, diesel, additives, and ethanol. VDU controls emissions from all materials.	560,640,000	420,480,000
EU0040	Fugitives	Truck vapor transit losses	560,640,000	420,480,000
EU0040	Fugitives	Fugitive emissions from equipment leaks (valves, pumps, fittings, etc.)	8,760 hours / Light liquid	8,760 hours / Light liquid

- 6) VOC emissions were calculated at the maximum throughput for all potential throughputs and are presented in Tables 5 and 6.
- a) Tank emissions were calculated using Tanks 4.0.9d. Gasoline emissions were based on a worst case scenario of Gasoline RVP 14.3, except for EU0070 (Tank #10). Gasoline emissions for Tank #10 were based on Gasoline RVP 10 as per Construction Permit 0697-013, condition 7, which prohibits storing anything in this tank with a vapor pressure greater than RVP 10. Diesel emissions were based on distillate fuel #2.
 - b) Loading Rack emissions were calculated based on equation (1) in AP42, Chapter 5.2, Transportation and Marketing of Petroleum Liquids.

$$L_L = [12.46 \text{ SPM} / T] \times [1 - \text{Control Efficiency}]$$
 Where:
 L_L = the loading loss, pounds per 1,000-gallons (lb/10³ gal) of liquid loaded
 S = the saturation factor from Table 5.2-1 of AP42, Chapter 5.2.
 P = the true vapor pressure of the liquid loaded, pounds per square inch (psia)
 M = the molecular weight of the vapors, pounds per pound-mole (lb/lb-mole)
 T = the temperature of the bulk liquid loaded, in °R
 1. When loading gasoline, emissions are limited to 10 mg/l of gasoline loaded. This calculates to 0.0834 lbs VOC / 10³ gal loaded. Total potential emissions are:

$$560,640,000 \text{ gallons gasoline} \times 0.0834 \text{ pounds VOC}/10^3 \text{ gallons loaded} / 1000 = 46,782.83 \text{ pounds VOC}$$
 2. When loading gasoline, emissions are calculated using $S = 0.6$ (for submerged loading, dedicated service); $P = 0.0084$ psia; $MW = 130$ lb/lb-mole; and $T = 528$ °R based on an average temperature of 68 °F. The control efficiency is assumed to be a minimum of 95%. This calculates to 0.00077 lbs VOC / 10³ gal loaded. Total potential emissions are:

$$420,480,000 \text{ gallons diesel} \times 0.00077 \text{ pounds VOC}/10^3 \text{ gallons loaded} / 1000 = 325.07 \text{ pounds VOC}$$
 - c) Fugitive truck vapor transit losses were calculated based on AP42, Chapter 5.2, Transportation and Marketing of Petroleum Liquids, Table 5.2-5. A factor of 13 mg/l of gasoline loaded or 0.11 lbs VOC / 10³ gal was selected. Total potential emissions are:

$$560,640,000 \text{ gallons gasoline} \times 0.11 \text{ pounds VOC}/10^3 \text{ gallons loaded} / 1,000 = 60,816.92 \text{ pounds VOC}$$
 - d) Fugitive emissions from equipment leaks were calculated based emission factors from Fugitive Emissions From Equipment Leaks II: Calculation Procedures for Petroleum Industry Facilities, API Publication No. 343, May 1998. Table 3 presents the emission factors and calculated fugitive emissions from equipment leaks at the installation.

Component Type	Service	Number	Factor		Emissions (lbs)
			(kg/hr/source)	(lb/hr/source)	[# of components] x [emission factor] x [8760 hours/year]
Valves	Light Liquid	30	4.30E-05	9.48E-05	25.86
	Gas	0	1.30E-05	2.87E-05	0.00
Loading Arm Valves	Light Liquid	7	4.30E-05	9.48E-05	6.03
	Gas	0	1.30E-05	2.87E-05	0.00
Open-End Lines	Light Liquid	0	1.30E-04	2.87E-04	0.00
	Gas	0	1.20E-04	2.65E-04	0.00
Fittings (Flanges, Connectors)	Light Liquid	65	8.00E-06	1.76E-05	10.02
	Gas	0	4.20E-05	9.26E-05	0.00
Pump Seals	Light Liquid	14	5.40E-04	1.19E-03	145.94
	Gas	0	6.50E-05	1.43E-04	0.00
Other	Light Liquid	0	1.30E-04	2.87E-04	0.00
	Gas	0	1.20E-04	2.65E-04	0.00
TOTALS:		116			187.85

7) HAP emissions were calculated by taking the total VOC emissions. The VOC's were then speciated according to the factors presented in Table 4. Total potential HAP emissions are presented in Tables 5 and 6.

HAP	Gasoline ¹	Diesel ²
Benzene	0.9%	6.68%
Cumene	0.0%	0.15%
Ethyl Benzene	0.1%	0.63%
n-Hexane	1.6%	5.39%
Isooctane	0.8%	--
Methyl t-Butyl Ether	n/a	n/a
Toluene	1.3%	3.88%
Xylene	0.5%	2.19%
Total HAP	5.2%	18.92%

¹ Gasoline emission factors are based on *Hazardous Air Pollutant Emissions from Gasoline Loading Operations at Bulk Gasoline Terminals, API Publication No. 347, Table 5-2, page 5-3, October 1998.*

² Diesel emission factors are extracted from the *Compilation of Air Emission Factors for Petroleum Distribution and Retail Marketing Facilities, September 1995.*

Emission Unit	Total VOC	Total HAP	Individual HAPs						
			Benzene	Cumene	Ethyl Benzene	n-Hexane	Isooctane	Toluene	Xylene
EU0020 / Tank #1	6.63	0.34	0.06	0.00	0.01	0.11	0.05	0.09	0.03
EU0050 / Tank #2	4.00	0.21	0.04	0.00	0.00	0.06	0.03	0.05	0.02
EU0060 /	0.75	0.04	0.01	0.00	0.00	0.01	0.01	0.01	0.00

TABLE 6 – Installation Potential to Emit (Tons per Year)
 Scenario 2: Emissions Calculated At Maximum Diesel Processing Rate

Emission Unit	Total VOC	Total HAP	Individual HAPs						
			Benzene	Cumene	Ethyl Benzene	n-Hexane	Isooctane	Toluene	Xylene
EU0070 / Tank #10	0.09	0.02	0.01	0.00	0.00	0.00	0.00	0.00	0.00
EU0080 / Tank #11	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
EU0010 / 2-Bay Loading Rack	0.16	0.03	0.01	0.00	0.00	0.01	0.00	0.01	0.00
EU0040 / Fugitive (Equipment)	0.09	0.02	0.01	0.00	0.00	0.01	0.00	0.00	0.00
EU0040 / Fugitive (Cargo)	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL	2.90	0.36	0.13	0.00	0.01	0.10	0.00	0.07	0.04

40 CFR Part 63 Subpart OO - *National Emission Standards for Tanks - Level 1,*

The provisions of this subpart apply only if specifically referenced by another applicable rule. This rule was determined not to apply to the installation because no applicable subpart of 40 CFR 60, 61, or 63 references its use.

40 CFR Part 63 Subpart TT - *National Emission Standards for Equipment Leaks - Control Level 1*

The provisions of this subpart apply only if specifically referenced by another applicable rule. This rule was determined not to apply to the installation because no applicable subpart of 40 CFR 60, 61, or 63 references its use.

40 CFR Part 63 Subpart UU - *National Emission Standards for Equipment Leaks - Control Level 2 Standards*

The provisions of this subpart apply only if specifically referenced by another applicable rule. This rule was determined not to apply to the installation because no applicable subpart of 40 CFR 60, 61, or 63 references its use.

40 CFR Part 63 Subpart WW - *National Emission Standards for Storage Vessels (Tanks) - Control Level 2*

- 1) The provisions of this subpart apply only if specifically referenced by another applicable rule. This rule was determined not to apply to the installation because no applicable subpart of 40 CFR 60, 61, or 63 references its use.
- 2) As discussed below under “Maximum Available Control Technology (MACT) Applicability”, the installation was determined to be subject to 40 CFR Part 63, Subpart BBBBBB. The installation may elect to comply with the control requirements for storage tanks found in this rule using specified provisions of 40 CFR Part 63, Subpart WW. However, the use of 40 CFR Part 63, Subpart WW for the purpose of compliance with 40 CFR Part 63, Subpart BBBBBB is included under the discussion

of MACT Applicability for Subpart BBBBBB and was not determined to cause these tanks to be subject to Subpart WW.

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*

This rule was determined to be applicable to the installation because TransMontaigne is a bulk gasoline terminal which is not subject to the control requirements of 40 CFR Part 63, Subpart R. The rule provides compliance requirements for storage tanks and loading racks and for all equipment and components in vapor or liquid gasoline service. Table 7, below, summarizes the review of equipment located at the installation. Equipment determined to be “in gasoline service” is subject to this rule.

Equipment / Emission Unit ID	Roof Configuration	In Gasoline Service?	Basis
Tank #1 / EU0020	Internal Floating Roof	Yes	Per permit condition PW001: Tanks #1 – 5 may store gasoline or lower vapor pressure products.
Tank #2 / EU0050	Internal Floating Roof	Yes	
Tank #3 / EU0060	Domed External Floating Roof	Yes	
Tank #4 / EU0065	Domed External Floating Roof	Yes	
Tank #5 / EU0025	Internal Floating Roof	Yes	
Tank #7 / EU0030	Horizontal Fixed Roof	No	Tanks store additives, which are not defined as gasoline.
Tank #8 / EU0030	Horizontal Fixed Roof	No	
Tank #9 / EU0030	Horizontal Fixed Roof	No	
Tank #10 / EU0070	Horizontal Fixed Roof	Yes	Tank stores “transmix”, a mixture of gasoline and diesel. Per construction permit 0697-013, Tank may be used to store petroleum products with a vapor pressure less than or equal to unleaded gasoline, RVP10.
Tank #11 / EU0080	Horizontal Fixed Roof	No	Tank stores ethanol, which is not defined as gasoline.
2-Bay Loading Rack / EU0010	N/A	Yes	Either rack may be used to load gasoline, diesel, additives, and/or ethanol.
All pumps, piping, valves, flanges, sample connection systems and other tank and piping components at the installation / EU0040	N/A	Yes	Any of these components may be used to transfer gasoline.

This rule became effective on January 10, 2008 and the compliance deadline for existing sources of January 10, 2011 will occur within the effective period of this permit. This operating permit includes permit conditions for each emission unit that will be subject to this rule.

TransMontaigne submitted an initial notification on April 15, 2008 to both EPA Region 7 and the Missouri DNR.

1) Equipment in gasoline service is subject to the leak detection provisions of 40 CFR 63.11089. The installation must perform a monthly equipment leak inspection and ensure that any leaking equipment components are repaired within a specified time period. The rule defines equipment as “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).” Since this overlaps with the leak inspection requirements of 40 CFR Part 60 Subpart XX, both requirements are incorporated in a plant-wide emission limitation for the equipment in gasoline service, permit condition PW003.

40 CFR Part 63 Subpart R provides an alternative to the monthly leak inspection requirements in §63.424(f), allowing the permittee to implement an instrument leak monitoring program that has been demonstrated to the Director as at least equivalent. The equivalent alternative was not included in the leak inspection requirements for Subpart BBBBBB in §63.11089. However, under the recordkeeping requirements for Subpart BBBBBB in §63.11094(d), the use of an instrument program presented as an option, i.e. “for facilities electing to implement an instrument program under §63.11089, the record shall contain a full description of the program.” Therefore, the alternative allowing for an instrument program was included as an option in PW003.

2) Storage tanks #1, #2, #3, #4, #5, and #10 are subject to the control and management requirements of §63.11087. Table 1 to Subpart BBBBBB of Part 63 provides several options for controlling emissions, depending on the size and roof configuration of the tank. Table 8 presents the control options available for the tanks determined to be in gasoline service at the installation:

TABLE 8 – Control Options Available for Storage Tanks based on Table 1 to Subpart BBBBBB		
1. Control Option for Tanks < 75m³ Capacity: All tanks in gasoline service with a capacity of less than 75 m ³ (19,813 gallons) are subject to the following control requirements:		
<u>Control Requirement</u>	<u>Applicable Section of Rule</u>	<u>Specified Requirement</u>
Operating	§ 63.11087 and Table 1 to Subpart BBBBBB of Part 63	Equip each gasoline storage tank with a fixed roof that is mounted to the storage tank in a stationary manner, and maintain all openings in a closed position at all times when not in use.
2. Control Options for Tanks ≥ 75 m³ Capacity: All tanks in gasoline service with a capacity of greater than or equal to 75 m ³ (19,813 gallons) are subject to one of the following control requirements, depending on the roof configuration:		
<ul style="list-style-type: none"> • Any tank may comply by meeting the requirements of option (a); • Any existing internal floating roof tank or any tank that installs an internal floating roof may comply by meeting the requirements of option (b) or option (d)(1); • Any existing external floating roof tank or any tank that installs an external floating roof may comply by meeting the requirements of option (c) or option (d)(2). 		
Option 2(a) – Control emissions using a closed vent and control device as described in 40 CFR Part 60, Subpart Kb		
<u>Control Requirement</u>	<u>Applicable Section of Rule</u>	<u>Applicable Referenced Section(s) of 40 CFR Part 60, Subpart Kb</u>
Operating	§ 63.11087 and Table 1 to Subpart BBBBBB of Part 63	<ul style="list-style-type: none"> • Reduce emissions of total organic HAP or TOC by 95 weight-percent with a closed vent system and control device as specified in 40 CFR 60.112b(a)(3) .
Monitoring	§ 63.11092	<ul style="list-style-type: none"> • Conduct a performance test and determine a monitored operating parameter value in accordance with the requirements in paragraphs (a) through (d) of 40 CFR 63.11092, except that the applicable level of control specified in paragraph (a)(2) shall be a 95-percent reduction in inlet total organic compounds (TOC) levels rather than 80 mg/l of gasoline loaded.

TABLE 8 – Control Options Available for Storage Tanks based on Table 1 to Subpart BBBB

Recordkeeping	§ 63.11094	<ul style="list-style-type: none"> Keep records as specified in 40 CFR 60.115b (c) and (d), except records shall be kept for at least 5 years
Reporting	§ 63.11095	<ul style="list-style-type: none"> Report information as specified in 40 CFR 60.115b (c) and (d)
Option 2(b) – Control emissions using an internal floating roof installed and operated as described in 40 CFR Part 60, Subpart Kb		
<u>Control Requirement</u>	<u>Applicable Section of Rule</u>	<u>Applicable Referenced Section(s) of 40 CFR Part 60, Subpart Kb</u>
Operating	§ 63.11087 and Table 1 to Subpart BBBB of Part 63	<ul style="list-style-type: none"> Equip each internal floating roof gasoline storage tank according to the requirements in 40 CFR 60.112b(a)(1), except for the secondary seal requirements under 40 CFR 60.112b(a)(1)(ii)(B) and the requirements in 40 CFR 60.112b(a)(1)(iv) through (ix). <i>[NB: The secondary seals and requirements described in 40 CFR 60.112b(a) may be installed but are not mandatory. If these seals are installed, they must be installed as required by 40 CFR 60.112b and the associated inspections and recordkeeping requirements in 40 CFR 60.113b(a) and 40 CFR 60.115b are required.]</i>
Monitoring	§ 63.11092	<ul style="list-style-type: none"> Perform inspections of the floating roof system according to the requirements of 40 CFR 60.113b(a)
Recordkeeping	§ 63.11094	<ul style="list-style-type: none"> Keep records as specified in 40 CFR 60.115b (a), except records shall be kept for at least 5 years
Reporting	§ 63.11095	<ul style="list-style-type: none"> Report information as specified in 40 CFR 60.115b (a)
Option 2(c) – Control emissions using an external floating roof installed and operated as described in 40 CFR Part 60, Subpart Kb		
<u>Control Requirement</u>	<u>Applicable Section of Rule</u>	<u>Applicable Referenced Section(s) of 40 CFR Part 60, Subpart Kb</u>
Operating	§ 63.11087 and Table 1 to Subpart BBBB of Part 63	<ul style="list-style-type: none"> Equip each external floating roof gasoline storage tank according to the requirements in 40 CFR 60.112b(a)(2), except that the requirements of 40 CFR 60.112b(a)(2)(ii) shall only be required if such storage tank does not currently meet the requirements of 40 CFR 60.112b(a)(2)(i).
Monitoring	§ 63.11092	<ul style="list-style-type: none"> Perform inspections of the floating roof system according to the requirements of 40 CFR 60.113b(b)
Recordkeeping	§ 63.11094	<ul style="list-style-type: none"> Keep records as specified in 40 CFR 60.115b (b), except records shall be kept for at least 5 years
Reporting	§ 63.11095	<ul style="list-style-type: none"> Report information as specified in 40 60.115b (b)
Option 2(d)(1) – Control emissions using an internal floating roof installed and operated as described in 40 CFR Part 63, Subpart WW		
<u>Control Requirement</u>	<u>Applicable Section of Rule</u>	<u>Applicable Referenced Section(s) of 40 CFR Part 63, Subpart WW</u>
Operating	§ 63.11087 and Table 1 to Subpart BBBB of Part 63	<ul style="list-style-type: none"> Equip and operate each internal floating roof gasoline storage tank according to the applicable requirements in 40 CFR 63.1063(a)(1) and (b).
Monitoring	§ 63.11092	<ul style="list-style-type: none"> Perform inspections of the floating roof system according to the requirements of 40 CFR 63.1063(c)(1).
Recordkeeping	§ 63.11094	<ul style="list-style-type: none"> Keep records as specified in 40 CFR 63.1065.
Reporting	§ 63.11095	<ul style="list-style-type: none"> Report information as specified in 40 CFR 63.1066.
Option 2(d)(2) – Control emissions using an external floating roof installed and operated as described in 40 CFR Part 63, Subpart WW		
<u>Control Requirement</u>	<u>Applicable Section of Rule</u>	<u>Applicable Referenced Section(s) of 40 CFR Part 63, Subpart WW</u>
Operating	§ 63.11087 and Table 1 to Subpart BBBB of Part 63	<ul style="list-style-type: none"> Equip and operate each internal and external floating roof gasoline storage tank according to the applicable requirements in 40 CFR

TABLE 8 – Control Options Available for Storage Tanks based on Table 1 to Subpart BBBBBB

Monitoring	§ 63.11092	63.1063(a)(1) and (b), and equip each external floating roof gasoline storage tank according to the requirements of 40 CFR 63.1063(a)(2) if such storage tank does not currently meet the requirements of 40 CFR 63.1063(a)(1).
Recordkeeping	§ 63.11094	<ul style="list-style-type: none"> • Perform inspections of the floating roof system according to the requirements of 40 CFR 63.1063(c)(2).
Reporting	§ 63.11095	<ul style="list-style-type: none"> • Keep records as specified in 40 CFR 63.1065. • Report information as specified in 40 CFR 63.1066.

- a) The requirements in Option 1 of Table 8 are included as an emission unit specific emission limitation for the horizontal storage tank with a capacity of less than 75 m³, Tank #10, in permit condition EU0070-002.
- b) EU0020 and EU0025 (Tanks #1 and #5) are currently subject to 40 CFR Part 60 Subpart Kb. As per §63.11087, tanks which are subject to, and in compliance with, the control requirements of 40 CFR Part 60, Subpart Kb, are deemed to be in compliance with this section. The installation must report this determination in the Notification of Compliance Status report under §63.11093(b) as described in the Reporting Requirements section of Permit Condition EU0020-001 and EU0025-001.

Since EU0020 and EU0025 are subject to the requirements of 40 CFR Part 60 Subpart Kb, the installation may not select an alternate method of compliance with the requirements of 40 CFR Part 63 Subpart BBBBBB for either tank unless the tank(s) continues to comply with the requirements of Subpart Kb.

- c) The requirements in Option 2(a) of Table 8 are an available control option for all storage tanks at the installation with a capacity of $\geq 75 \text{ m}^3$ to control emissions through the use of a closed vent system and control device. Specific permit conditions are presented in Attachment I-2. The installation is not currently using this as a control method for any tanks. However, this control method is referenced as an option in permit conditions EU0050-001, EU0060-001, and EU0065-001.
- d) The requirements in Option 2(b) of Table 8 are presented as the designated control option for the internal floating roof tank at the installation with a capacity of $\geq 75 \text{ m}^3$, EU0050 (Tank #2), and the domed external floating roof tanks at the installation with a capacity of $\geq 75 \text{ m}^3$, EU0060 and EU0065 (Tank #3 and Tank #4) in permit condition EU0050-001, EU0060-001, and EU0065-001.

Tanks using this option to comply with Subpart BBBBBB must operate a new or existing internal floating roof that meets the specified requirements of 40 CFR Part 60 Subpart Kb. A domed external floating roof tank meets the definition of an internal floating roof tank in §60.111b.

Under the previous operating permit (OP2000-073), these tanks were determined to be subject to 40 CFR Part 63 Subpart R. As required by Subpart R, EU0050, EU0060, and EU0065 are currently operating in compliance with the specified requirements of 40 CFR Part 60 Subpart Kb. The installation has voluntarily elected to continue to operate these emission units in compliance with these requirements until they are required to be in compliance with the requirements of 40 CFR Part 60 Subpart BBBBBB as presented in permit condition EU0050-001, EU0060-001 and EU0065-001.

- e) The requirements in Option 2(c) of Table 8 are an available control option for vertical storage tanks with a capacity of $\geq 75 \text{ m}^3$ to control emissions by operating a new or existing external floating roof that meets the specified requirements of 40 CFR Part 60 Subpart Kb.

There are currently no tanks meeting the definition of an external floating roof tank at the installation. Therefore, no permit conditions referencing this option were included in the operating permit.

- f) The requirements in Option 2(d)(1) of Table 8 are an available control option for all vertical storage tanks at the installation with a capacity of $\geq 75 \text{ m}^3$ to control emissions by operating a new or existing internal floating roof that meets the specified requirements of 40 CFR Part 63 Subpart WW. Specific permit conditions are presented in Attachment I-1. The installation is not currently using this as a control method for any tanks. However, this control method is referenced as an option in permit conditions EU0050-001, EU0060-001, and EU0065-001
- g) The requirements in Option 2(d)(2) of Table 8 are an available control option for all vertical storage tanks at the installation with a capacity of $\geq 75 \text{ m}^3$ to control emissions by operating a new or existing external floating roof that meets the specified requirements of 40 CFR Part 63 Subpart WW.

There are currently no tanks meeting the definition of an external floating roof tank at the installation. Therefore, no permit conditions referencing this option were included in the operating permit.

- 3) Loading racks in gasoline service are subject to the control and management provisions of §63.11088. The rule provides two options for controlling emissions, depending on the daily gasoline throughput of the terminal, in Table 2 to SubpartBBBBBB of Part 63. The installation has a maximum throughput greater than or equal to 250,000 gallons per day and is therefore subject to the requirements of option 1 in Table 2 to SubpartBBBBBB of Part 63.

- a) Option 1 in Table 2 establishes an emission limit of 80 milligrams of total organic compounds per liter of gasoline loaded (80 mg TOC / liter of gasoline).

The installation is also subject to the New Source Performance Requirements of 40 CFR Part 60 Subpart XX which establish an emission limit of 35 mg TOC / liter of gasoline loaded for new sources.

As discussed in the review of Subpart XX, the installation has voluntarily agreed to continue to operate the VDU in compliance with the operating parameters established during the October 19, 2000 performance test and to continue to comply with an emission limit of 10 mg TOC / liter of gasoline loaded.

- b) Special permit condition #5 for Construction Permit #0697-014, issued July 25, 1997, specifies the use of an ultraviolet (UV) scanner to indicate that the VDU is operational and specifies monitoring and recordkeeping requirements for this UV scanner. These requirements are included in permit condition EU0010-001, along with the Compliance Assurance Monitoring requirements. The regulatory monitoring requirements of §63.11092 were included in permit condition EU0010-002.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

In the permit application and according to ACP 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.

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 was determined to be applicable to EU0010, the Truck Loading Rack, because this emission unit uses a control device to achieve compliance with the Total Organic Compound (TOC) emission limits in 40 CFR Part 60 Subpart XX, Standards of Performance for Bulk Gasoline Terminals and 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.

Permit condition EU0010-001 contains the Compliance Assurance Monitoring Approach for the CEMS and Attachment J contains the Compliance Assurance Monitoring Plan.

Emission Units Without Limitations

The following emission units were determined not to have emission unit specific permit requirements. However, these units may be subject to the plantwide permit conditions and emissions from these operations may be reportable in the annual emissions inventory.

- 1) EU0030 [Tanks #7, #8, and #9]: These tanks store gasoline additives and diesel additives. These additives do not meet the definition of gasoline as applicable to 40 CFR Part 63 Subpart BBBBBB. As indicated above, the NSPS regulations of 40 CFR Part 60 Subpart Kb are not applicable and no other regulations were determined to apply to these units.
- 2) EU0040 [Fugitive emissions from pumps, valves, fittings, etc. and vehicle vapor transit losses]: This equipment handles gasoline, diesel, ethanol, gasoline additives, and diesel additives. Since this equipment is subject to the plantwide emission limitations for equipment leaks described in PW003, it was not given an emission unit specific limitation.
- 3) EU0080 [Tank #11]: This tank stores ethanol. Ethanol does not meet the definition of gasoline as applicable to 40 CFR Part 63 Subpart BBBBBB. As indicated above, the NSPS regulations of 40 CFR Part 60 Subpart Kb are not applicable and no other regulations were determined to apply to this unit.

- 4) EU0090 [Tank #12]: This is a tank in the closed loop oil/water system. This unit is expected to hold only minimal amounts of petroleum distillates or gasoline and would not meet the definition of gasoline as applicable to 40 CFR Part 63 Subpart BBBBBB. As indicated above, the NSPS regulations of 40 CFR Part 60 Subpart Kb are not applicable and no other regulations were determined to apply to this unit.

Other Regulatory Determinations

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

- 1) Operating permit 0935-AR-5 was issued by the Arkansas Department of Environmental Quality to the TransMontaigne Terminal located in Rogers, Arkansas. This permit limits that installation's throughput to 350,000,000 gallons of gasoline and/or diesel in any consecutive 12-month period. The gasoline and/or diesel is shipped from the TransMontaigne – Mount Vernon Terminal via the pipeline to the Rogers Arkansas Terminal. Plantwide permit condition PW001 therefore establishes this as a voluntary limit as the maximum amount shipped from the TransMontaigne – Mount Vernon Terminal via the pipeline during any consecutive 12-month period.
- 2) The permittee requested the flexibility to store gasoline or documented lower vapor pressure products in Tanks #1 – #5 [EU0020, EU0025, EU0050, EU0060, and EU0065] in the permit renewal. This was incorporated as plantwide permit condition PW002, along with recordkeeping requirements to document compliance.

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

This rule was checked as not applicable to the installation in the application for the reason “K”, “Other”. However, the rule is now included in the Core Permit Requirements. The installation is located in the outstate Missouri area and would be subject to the following visible emission limits:

For existing sources, visible emissions may not exceed an opacity of 40%. For new sources, visible emissions may not exceed an opacity of 20%. The allowable exception is that visible emissions with an opacity of up to 60% may be discharged for a period(s) aggregating not more than six (6) minutes in any 60 minutes.

All of the emission units with the exception of the Vapor Disposal Unit (VDU) associated with EU0010 emit only volatile organic compounds (VOC). These VOC emissions are not in a form to be considered to be visible air contaminants. The VDU for emission unit EU0010, the truck loading racks, may emit combustion byproducts and is the only emission unit potentially subject to this rule. The VDU is a John Zink model ZFT-2-8-35-X-2/8 enclosed flare, which is designed for smokeless operation. Although visible emissions will be unlikely from this source, permit condition EU0010-003 includes monitoring requirements for this rule.

Emission Unit Numbering Changes

The previous operating permit (OP2000-073) grouped Tanks #1, #2, #3, #4, #5, and #10 into emission unit EU0020 and stated that all tanks were subject both to 40 CFR Part 60 Subpart Kb and to 40 CFR Part 63 Subpart R. The previous operating permit also grouped Tanks #7, #8, #9, and #11 into emission unit EU0030 and stated that all tanks were subject to 40 CFR Part 60 Subpart Kb. This operating permit

assigned a separate emission unit number to each tank and determined that different regulations were applicable in some cases. This permit groups those tanks with similar permit conditions.

Tank #	Previous Permit (OP2000-073)		Current Permit	
	EU ID	Permit Conditions (Rules)	EU ID	Permit Conditions (Rules)
1 (Internal Floating Roof)	EU0020	EU0020-001 (NSPS: Subpart Kb) (MACT: Subpart R)	EU0020	EU0020- and EU0025-001 (NSPS: Subpart Kb) (MACT: Subpart BBBBBB)
2 (Internal Floating Roof)	EU0020	EU0020-001 (NSPS: Subpart Kb) (MACT: Subpart R)	EU0050	EU0050-, EU0060- & EU0065-001 (NSPS: N/A) (MACT: Subpart BBBBBB)
3 (Domed External Floating Roof)	EU0020	EU0020-001 (NSPS: Subpart Kb) (MACT: Subpart R)	EU0060	EU0050-, EU0060- & EU0065-001 (NSPS: N/A) (MACT: Subpart BBBBBB)
4 (Domed External Floating Roof)	EU0020	EU0020-001 (NSPS: Subpart Kb) (MACT: Subpart R)	EU0065	EU0050-, EU0060- & EU0065-001 (NSPS: N/A) (MACT: Subpart BBBBBB)
5 (Internal Floating Roof)	EU0020	EU0020-001 (NSPS: Subpart Kb) (MACT: Subpart R)	EU0025	EU0020- and EU0025-001 (NSPS: Subpart Kb) (MACT: Subpart BBBBBB)
7 (Additive Tank)	EU0030	EU0030-001 (NSPS: Subpart Kb) (MACT: N/A)	EU0030	None (NSPS: N/A) (MACT: N/A)
8 (Additive Tank)	EU0030	EU0030-001 (NSPS: Subpart Kb) (MACT: N/A)	EU0030	None (NSPS: N/A) (MACT: N/A)
9 (Additive Tank)	EU0030	EU0030-001 (NSPS: Subpart Kb) (MACT: N/A)	EU0030	None (NSPS: N/A) (MACT: N/A)
10 (Horizontal)	EU0020	EU0020-001 (NSPS: Subpart Kb) (MACT: Subpart R)	EU0070	EU0070-001 (NSPS: N/A) (MACT: Subpart BBBBBB)
11 (Horizontal)	EU0030	EU0030-001 (NSPS: Subpart Kb) (MACT: N/A)	EU0080	None (NSPS: N/A) (MACT: N/A)

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).

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