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 herein.

Operating Permit Number: OP2018-084
Expiration Date: OCT 02 2023
Installation ID: 109-0002
Project Number: 2014-11-045

Installation Name and Address
Mount Vernon Terminal
15376 Highway 96
Mt. Vernon, MO 65712
Lawrence County

Parent Company’s Name and Address
TransMontaigne Operating Company L.P.
PO 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, 2 ethanol tanks, 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. The installation is a synthetic minor source of criteria air pollutants due the gallon limitation in Permit Condition PW001.

Kendall B. Hall
Director or Designee
Department of Natural Resources

OCT 02 2018
Effective Date
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I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS
The following list provides a description of the equipment at this installation that emits air pollutants and that are identified as having unit-specific emission limitations.

<table>
<thead>
<tr>
<th>Emission Point No.</th>
<th>Description of Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP01</td>
<td>Tank #1: 1.512 Million Gallon Internal Floating Roof Gasoline Tank</td>
</tr>
<tr>
<td>EP02</td>
<td>Tank #2: 0.714 Million Gallon Internal Floating Roof Gasoline Tank</td>
</tr>
<tr>
<td>EP03</td>
<td>Tank #3: 0.966 Million Gallon Vertical Domed External Floating Roof Gasoline Tank</td>
</tr>
<tr>
<td>EP04</td>
<td>Tank #4: 0.966 Million Gallon Vertical Domed External Floating Roof Gasoline Tank</td>
</tr>
<tr>
<td>EP05</td>
<td>Tank #5: 4.830 Million Gallon Internal Floating Roof Gasoline Tank</td>
</tr>
<tr>
<td>EP07</td>
<td>2 Bay Submerged Truck Loading Rack (modified 1997) w/vapor destruction unit (enclosed flare, installed 1997)</td>
</tr>
<tr>
<td>EP10</td>
<td>Tank #10: 294 Gallon Horizontal Fixed Roof Transmix Tank</td>
</tr>
<tr>
<td>EP11</td>
<td>Tank #11: 0.015 MMGal Horizontal Fixed Roof Ethanol Tank</td>
</tr>
<tr>
<td>EP13</td>
<td>Tank #13: 0.015 MMGal Horizontal Fixed Roof Ethanol Tank</td>
</tr>
</tbody>
</table>

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS
The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

<table>
<thead>
<tr>
<th>Emission Point No.</th>
<th>Description of Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Tank #7: 45 Bbl Fixed Roof Additive Tank</td>
</tr>
<tr>
<td></td>
<td>Tank #8: 48 Bbl Fixed Roof Additive Tank</td>
</tr>
<tr>
<td></td>
<td>Tank #9: 7 Bbl Fixed Roof Additive Tank</td>
</tr>
<tr>
<td>FUG</td>
<td>Fugitive Emissions from pumps, valves, fittings, etc.</td>
</tr>
<tr>
<td>FUG</td>
<td>Fugitive Emissions from vehicle vapor transit losses</td>
</tr>
<tr>
<td></td>
<td>Tank #12: 96” x 32’ tank in closed loop oil/water system</td>
</tr>
</tbody>
</table>
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. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations.

PERMIT CONDITION PW001
10 CSR 10-6.065 Operating Permits (Voluntary Limitations)

**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 B 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:**
1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or by email to AirComplianceReporting@dnr.mo.gov, 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.
2) The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program’s Compliance/Enforcement Section at P.O. Box 176, Jefferson City, Missouri 65102 or AirComplianceReporting@dnr.mo.gov as required by Section V of this permit.
PERMIT CONDITION PW002

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
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. [§63.11089(a)]
   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. [§63.11089(c)]

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. [§63.11089(c)]

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. [§63.11089(d)]

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: [§63.11085(a)]
   a) Minimize gasoline spills; [§63.11086(d)(1)]
   b) Clean up spills as expeditiously as practicable; [§63.11086(d)(2)]
   c) Cover all open gasoline containers and all gasoline storage fill pipes with a gasketed seal when not in use; [§63.11086(d)(3)]
   d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators. [§63.11086(d)(4)]

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 Administrator 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: [§63.11089(b)]
   a) A list, summary description, or diagram(s) showing the type, identification number, and location of all equipment in gasoline service; [§63.11089(b)]
   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: [§60.505(c)]
   a) Date of inspection. [§60.505(c)(1)]
   b) The equipment type and identification number; [§63.11094(e)(1)]
   c) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak). Each finding shall be recorded in the logbook. [§60.505(c)(2)]
   d) The leak determination method (i.e., sight, sound, or smell). [§60.505(c)(3)]
   e) If a leak is identified, the permittee must also record the following: [§63.11094(e)]
      1. The nature of the leak (i.e., vapor or liquid); [§63.11094(e)(2)]
      2. The date of each attempt to repair the leak; [§63.11094(e)(3)]
      3. Repair methods applied in each attempt to repair the leak; [§63.11094(e)(4)]
      4. "Repair delayed" and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak; [§63.11094(e)(5)]
      5. The expected date of successful repair of the leak if the leak is not repaired within 15 days; and [§63.11094(e)(6)]
      6. The date of successful repair of the leak. [§63.11094(e)(7)]
   f) The name and signature of the person completing the inspection. [§60.505(c)(5)]

3) An authorized representative of the permittee shall sign the inspection record at the completion of each inspection.

4) Attachment E (Leak Inspection Log Sheet) and Attachment A (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 Missouri Air Compliance Coordinator at EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219 and send copies to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or by email to AirComplianceReporting@dnr.mo.gov, 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. [§63.11095(a)(3)]
   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: [§63.11095(b)(5)]
      1. The date on which the leak was detected; [§63.11095(b)(5)(i)]
2. The date of each attempt to repair the leak; [§63.11095(b)(5)(ii)]
3. The reasons for the delay of repair; and [§63.11095(b)(5)(iii)]
4. The date of successful repair. [§63.11095(b)(5)(iv)]

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.

3) The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program’s Compliance/Enforcement Section at P.O. Box 176, Jefferson City, Missouri 65102 or AirComplianceReporting@dnr.mo.gov as required by Section V of this permit.
III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

**PERMIT CONDITION 001**

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

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP07</td>
<td>2 Bay Submerged Truck Loading Rack (modified 1997) w/vapor destruction unit (enclosed flare, installed 1997)</td>
</tr>
</tbody>
</table>

**Emission / Operational Limitations:**
1) EP07 shall be equipped with a vapor collection and disposal system (VDU) designed to collect total organic compounds vapors displaced from tank trucks during gasoline loading. [Special Condition 5]
2) The permittee shall operate the VDU at all times that EP07 is loading cargo tank trucks with gasoline. [Special Condition 5]
3) The VDU shall be operated and maintained in accordance with the manufacturer’s specifications and good engineering practices. [Special Condition 5]

**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. [Special Condition 5]
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. [Special Condition 5]
5) The Event Log shall be located such that it may be easily observed by Missouri Department of Natural Resources’ personnel upon request. [Special Condition 5]
6) The permittee shall maintain an operating and maintenance log for the VDU which records the following: [Special Condition 7]
   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 A 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 Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or by email to AirComplianceReporting@dnr.mo.gov, 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 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
10 CSR 10-6.065 Operating Permits (Voluntary Limitations)
40 CFR Part 64 Compliance Assurance Monitoring

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<tbody>
<tr>
<td>EP07</td>
<td>2 Bay Submerged Truck Loading Rack (modified 1997) w/vapor destruction unit (enclosed flare, installed 1997)</td>
</tr>
</tbody>
</table>

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. [Voluntary]
2) The permittee shall ensure that the gasoline loading racks in EP07 comply with the most stringent applicable provisions of both 40 CFR Part 60, Subpart XX and 40 CFR Part 63, Subpart BBBBBB.

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 EP07 loading racks unless the cargo tank trucks are equipped with vapor collection equipment that is compatible with the installation’s vapor collection system. [§60.502(f)]
   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. [§60.502(g)]
   c) The permittee shall ensure that EP07 loading racks transfer liquid product only into vapor-tight gasoline cargo tanks. The following procedures should be observed: [§60.502(e)]
      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 EP07 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: [§60.505(b)]
1. Name of test: Gasoline Delivery Tank Pressure Test-EPA Reference Method 27 or periodic railcar bubble leak testing. [§60.505(b)(1) and §63.11094(b)(2)(i)]

ii. Cargo tank owner's name and address. [§60.505(b)(2) and §63.11094(b)(2)(ii)]

iii. Cargo tank identification number. [§60.505(b)(3) and §63.11094(b)(3)(iii)]

iv. Testing location. [§60.505(b)(4) and §63.11094(b)(3)(iv)]

v. Date of test. [§60.505(b)(5) and §63.11094(b)(3)(iv)]

vi. Tester name and signature. [§60.505(b)(6) and §63.11094(b)(3)(v)]

vii. Witnessing inspector, if any: Name, signature, and affiliation. [§60.505(b)(7) and §63.11094(b)(3)(vi)]

viii. Vapor tightness repair: Nature of repair work and when performed in relation to vapor tightness testing. [§60.505(b)(7) and §63.11094(b)(2)(vii)]

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. [§60.505(b)(8) and §63.11094(b)(3)(vii)]

2. The permittee shall require the tank identification number to be recorded as each gasoline cargo tank is loaded using EP07 loading racks. [§60.502(e)(2)]

3. The permittee shall cross-check each tank identification number obtained in §60.502(e)(2) with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless one of the following conditions is applicable: [§60.502(e)(3)(i)]

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 [§60.502(e)(3)(i)(A)]

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. [§60.502(e)(3)(i)(B)]

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. [§60.502(e)(3)(ii)]

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 EP07 loading racks within 1 week of the completion of the documentation cross-check. [§60.502(e)(4)]

ii. Take appropriate steps to ensure that the non-vapor-tight gasoline cargo tank will not be reloaded by EP07 loading racks until vapor tightness documentation for that gasoline cargo tank is obtained which meets the requirements described in this section. [§60.502(e)(5)]

5. Alternate procedures to those described in this section for limiting gasoline cargo tank loadings may be used upon application to and approval by the Director. [§60.502(e)(6)]

d) The permittee shall ensure that the vapor collection system is designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack. [§60.502(d)]

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). [§60.502(h)]

2. No pressure-vacuum vent in the vapor collection system for EP07 shall begin to open at a system pressure less than 4,500 pascals (450 mm of water). [§60.502(i)]

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: [§63.11092(a)(1)]
   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. [§63.11092(b)(3)]
   ii. The permittee shall provide for the Administrator'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. [§63.11092(b)(4)]

2. If the permittee elects to comply with the performance testing alternatives listed in §63.11092(a)(1) or (a)(3), the permittee shall: [§63.11092(b)(5)]
   i. Monitor an operating parameter that has been approved by the Administrator and is specified in the installation's current enforceable operating permit. [§63.11092(b)(5)(i)]
   ii. Determine an operating parameter value based on engineering assessment and the manufacturer's recommendation and provide for the Administrator'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. [§63.11092(b)(5)(ii)]
   iii. At the time that the Administrator requires a new performance test, the permittee must determine the monitored operating parameter value according to the requirements specified in §63.11092(b). [§63.11092(b)(5)(i) and (b)(5)(ii)]

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 §63.11092(b). [§63.11092(d)(1)]

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 §63.11092(d)(4). [§63.11092(d)(3)]

2. Malfunctions that are discovered during monitoring and inspections conducted as required by the monitoring and inspection plan described in §63.11092(b)(1)(i)(B)(2) and (b)(1)(iii)(B)(2), 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: [§63.11092(d)(4)]
   i. Initiate corrective action to determine the cause of the problem within 1 hour; [§63.11092(d)(4)(i)]
   ii. Initiate corrective action to fix the problem within 24 hours; [§63.11092(d)(4)(ii)]
iii. Complete all corrective actions needed to fix the problem as soon as practicable consistent with good air pollution control practices for minimizing emissions; \[§63.11092(d)(3)(iii)\]

iv. Minimize periods of start-up, shutdown, or malfunction; and \[§63.11092(d)(3)(iv)\]

v. Take any necessary corrective actions to restore normal operation and prevent the recurrence of the cause of the problem. \[§63.11092(d)(3)(v)\]

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 EP07 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. \[§63.6(e)(1)(i)\]

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. \[§63.6(e)(1)(ii)\]

**Monitoring Requirements (CAM):**

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.

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 indicator to within the acceptable 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: 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: 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) The permittee 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, The permittee is required to operate and maintain the source in accordance with good air pollution control practices for minimizing emissions during such periods. This requires the permittee 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>
<thead>
<tr>
<th>Indicator</th>
<th>VCU Pilot Flame</th>
<th>Leak Detection and Repair (LDAR) of Vapor Collection System</th>
<th>Operation of Assist Air Blower</th>
<th>Operation of Vapor Line Valve</th>
<th>Tanker Truck Vapor Tightness</th>
<th>Comprehensive VCU Inspection</th>
</tr>
</thead>
<tbody>
<tr>
<td>Measurement Approach</td>
<td>Ultraviolet Flame Detector (UFD)</td>
<td>Sight, sound, and smell leak inspections of liquid and vapor piping components associated with the loading rack.</td>
<td>VCU Programmable Logic Controller (PLC) system start-up check</td>
<td>Pressure Sensor/Transmitter</td>
<td>Tanker Truck Vapor Tightness Testing performed annually by tanker truck owner/operator.</td>
<td>Routine cleaning, adjustment, and repair of the VCU system in accordance with John Zink recommendations.</td>
</tr>
<tr>
<td>Indicator Range</td>
<td>Presence of a pilot flame.</td>
<td>No leaks in the Vapor Collection System.</td>
<td>Blower running.</td>
<td>Less than 17.5 inches of water column.</td>
<td>Tanker truck driver's presentation of valid tightness testing certification.</td>
<td>Inspections performed semiannually. A John Zink-qualified technician must be present during at least one semiannual inspection per year.</td>
</tr>
<tr>
<td>Excursion</td>
<td>Absence of a pilot flame.</td>
<td>A leak in the Vapor Collection System.</td>
<td>Blower not running.</td>
<td>Equal to or greater than 17.5 inches of water column.</td>
<td>Failure to present a valid tightness testing certification.</td>
<td>Failure to perform inspections in accordance with that specified in the indicator range.</td>
</tr>
</tbody>
</table>
## Quality Improvement Plan (QIP) Threshold

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, *Standards of Performance for Bulk Gasoline Terminals*.

### Data Representativeness

The flame sensor is located within the VCU to view the pilot flame as designed by the manufacturer, John Zink.

The piping components at the loading rack, vapor collection system, and VCU must have integrity to prevent leaks.

The PLC on the VCU is hard programmed to validate the operation of the blower prior to authorizing loading.

Pressure is monitored within the vapor line. If pressure equals or exceeds 17.5 inches of water column, PLC shall initiate an automatic shutdown.

All tanker trucks loaded shall be properly tested in accordance with 40 CFR Part 60, Subpart XX.

**Inspection and maintenance of the VCU system helps to ensure proper ongoing operation.**

### Verification of Operational Status

The pilot flame system, as well as the flame sensing system, will be inspected and maintained per manufacturer’s recommendations.

Timely inspections.

The proper functioning of the blower will be determined during scheduled maintenance per manufacturer’s recommendations.

Inspection of the vapor valve and controls in accordance with manufacturer’s recommendations.

**NA**

**NA**

### QA/QC Practices and Criteria

Semiannual inspection of VCU.

Monthly inspection of the vapor collection system. Any and all leaks shall be repaired within fifteen (15) days.

Semiannual inspection of VCU.

Semiannual inspection of VCU.

Each time driver requests loading, the validity of the testing certification is checked (i.e., is current certification on file?). If no
### Monitoring Frequency

<table>
<thead>
<tr>
<th>Monitoring Frequency</th>
<th>Continuous while receiving loading request from loading rack Terminal Management System (TMS) computer.</th>
<th>Monthly.</th>
<th>Each time a request to load is received from the TMS computer.</th>
<th>Continuous while receiving loading request from loading rack TMS computer.</th>
<th>Annual retesting and submittal of valid test certifications.</th>
<th>Semiannually by Permittee’s operations personnel and annually with a John Zink qualified technician present.</th>
</tr>
</thead>
</table>

### Data Collection Procedure

<table>
<thead>
<tr>
<th>Data Collection Procedure</th>
<th>All excursions shall be logged by operations personnel.</th>
<th>Sight, sound and smell, and leaks, shall be logged by operations personnel.</th>
<th>Any faults/failures shall be logged by operations personnel.</th>
<th>All excursions shall be logged by operations personnel.</th>
<th>Loading Rack TMS computer system</th>
<th>Results of inspections and repairs shall be logged by operations personnel.</th>
</tr>
</thead>
</table>

### Averaging Period

<table>
<thead>
<tr>
<th>Averaging Period</th>
<th>None/NA</th>
<th>None/NA</th>
<th>None/NA</th>
<th>None/NA</th>
<th>None/NA</th>
<th>None/NA</th>
</tr>
</thead>
</table>

### 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, Operating Permits.
2) **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: [§63.11092(a)(1)]
   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 [§63.11092(a)(1)(i)]
   ii. Use alternative test methods and procedures in accordance with the alternative test method requirements in §63.7(f). [§63.11092(a)(1)(ii)]

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 §63.11092(a)(1). [§63.11092(a)(2)]

3. The permittee shall conduct a full performance test every 5 years after the last performance test or within six months of resuming operation of the vapor processing and collection system to demonstrate compliance with 40 CFR Part 60, Subpart XX, **Standards of Performance for Bulk Gasoline Terminals.**

b) For each performance test conducted under §63.11083(a)(1), 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. [§63.11092(b)(1)]

c) Performance tests conducted after the initial test on the VDU shall meet the requirements of §63.11092(a)(1). 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 §60.502(h) and (i).

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

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 in §63.11092(b)(1) through (5). [§63.11092(b)]

1. 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. [§63.11092(b)(1)(iii) and (b)(1)(iii)(A)]
   
   **Note:** Permit Condition 002 contains the Compliance Assurance Monitoring Approach for the CPMS which meets the above requirements.

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 §60.505(b) and §63.11094(b) 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 §63.11094(c)(1) or (c)(2): [§63.11094(c)]
   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 Administrator must be notified in writing that the installation using this method to maintain compliance. [§63.11094(c)(1)(i) and (ii)]
   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 Administrator must be notified in writing that the installation using this method to maintain compliance. [§63.11094(c)(2), (c)(2)(i), and (c)(2)(ii)]
   3. The permittee shall keep documentation of any notifications required as described in §60.502(e)(4) and (e)(5) 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: [§63.11094(f)]
      1. The continuous monitoring data required in §63.11092(b) or (e). This record shall indicate the time intervals during which loadings of gasoline cargo tanks have occurred or, alternatively, shall record the operating parameter data only during such loadings. The date and time of day shall also be indicated at reasonable intervals on this record. [§63.11094(f)(1)]
      2. The monitoring and inspection plan described in §63.11092(b)(1)(i)(B)(2) or (b)(1)(iii)(B)(2). [§63.11094(f)(3)]
      3. A record of all system malfunctions, as specified in §63.11092(b)(1)(i)(B)(2)(v) or (b)(1)(iii)(B)(2)(v). [§63.11094(f)(4)]
   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 §63.11092(b) or (e). 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. [§63.11094(f)(2)(i)]
   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. [§63.11094(f)(5)]
   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 EP07 loading racks, air pollution control and monitoring equipment. This permit condition is met by Permit Condition 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 Missouri Air Compliance Coordinator at EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219 and shall send copies to the Missouri Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or by email to AirComplianceReporting@dnr.mo.gov as applicable for the EP07 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 in §63.11092(b) or (e). [§63.11093(b)]

      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 Administrator to review and approve the site-specific test plan required under §63.7(c), if requested by the Administrator, 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 Missouri Air Compliance Coordinator at EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219 and shall send copies to the Missouri Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or by email to AirComplianceReporting@dnr.mo.gov, 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 §63.11092(b) or (e). The report shall include the monitoring data for the days on which exceedances or failures to maintain have occurred, and a description and timing of the steps taken to repair or perform maintenance on the vapor collection and processing systems or the CMS. [§63.11095(b)(3)]

      c) Each instance in which malfunctions discovered during monitoring and inspections conducted as required by the Monitoring and Inspection Plan described in §63.11092(b)(1)(i)(B)(2) and (b)(1)(iii)(B)(2), were not resolved according to the necessary corrective actions described in
above. The report shall include a description of the malfunction and the timing of the steps taken to correct the malfunction. [§63.11095(b)(4)]

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. [§63.11095(b)(1)]

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 §63.11094(b). [§63.11095(b)(1)]

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. The permittee shall also send these reports to the Missouri Air Compliance Coordinator at EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219.

b) The permittee shall comply with any additional applicable reporting requirements of §63.10.

**PERMIT CONDITION 003**

10 CSR 10-6.070 New Source Performance Regulations
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP01</td>
<td>Tank #1: 1.512 MMGal, internal floating roof tank, installed 1985</td>
</tr>
<tr>
<td>EP05</td>
<td>Tank #5: 4.830 MMGal, internal floating roof tank, installed 1989</td>
</tr>
</tbody>
</table>

**Emission / Operational Limitations:**

1) The permittee shall control emissions from the EP01 and EP05 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.

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. [§63.11087(f)]

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 EP01 or EP05 (Tanks #1 or #5) unless a closed vent system and control system or equivalent is installed as described below. [§60.112b(a)]

**Equipment / Procedural Requirements:**

1) **Internal Floating Roof, §60.112b(a)(1):**
   a) The permittee shall ensure that the EP01 and EP05 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: [§60.112b(a)(1)]
      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. [§60.112b(a)(1)(i)]

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: [§60.112b(a)(1)(ii)]
   i. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous. [§60.112b(a)(1)(ii)(B)]

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. [§60.112b(a)(1)(iii)]

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. [§60.112b(a)(1)(iv)]

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. [§60.112b(a)(1)(v)]

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. [§60.112b(a)(1)(vi)]

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. [§60.112b(a)(1)(vii)]

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. [§60.112b(a)(1)(viii)]

9. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [§60.112b(a)(1)(ix)]

**Monitoring / 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 EP01 or EP05 (Tank #1 or #5) tank that is equipped with a fixed roof in combination with an internal floating roof: [§60.113b(a)]
      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. [§60.113b(a)(1)]
      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 Director in the inspection report required in §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. [§60.113b(a)(2)]

3. For vessels equipped with a double-seal system as specified in §60.112b(a)(1)(ii)(B):
   [§60.113b(a)(3)]
   i. Visually inspect the vessel as specified in §60.113b(a)(4), at least every 5 years; or
   [§60.113b(a)(3)(i)]
   ii. Visually inspect the vessel as specified in §60.113b(a)(2). [§60.113b(a)(3)(ii)]

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, 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 §60.113b(a)(2). [§60.113b(a)(4)]

5. The permittee shall notify the Director in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by §60.113b(a)(1) and (a)(4), to afford the Department of Natural Resources the opportunity to have an observer present. If the inspection required by §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 Director at least 7 days prior to the refilling. [§60.113b(a)(5)]

6. The permittee shall keep a record of each inspection performed as required in §60.113b(a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment including seals, internal floating roof, and fittings. These records shall be maintained onsite for a minimum of five years. [§60.115b(a)(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 EP01 and EP05 ( 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. [§60.116b(b)]

b) The permittee shall maintain records of the petroleum liquid(s) stored in EP01 and EP05 (Tanks #1 and #5) using the log shown in Attachment C 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:
1) 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)(I)(III) and Section V of this permit. The permittee shall also send these reports to the Missouri Air Compliance Coordinator at EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219.

PERMIT CONDITION 004
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP02</td>
<td>Tank #2: 0.714 MMGal, internal floating roof tank, installed 1971</td>
</tr>
<tr>
<td>EP03</td>
<td>Tank #3: 0.966 MMGal, domed external floating roof tank, installed 1959</td>
</tr>
<tr>
<td>EP04</td>
<td>Tank #4: 0.966 MMGal, domed external floating roof tank, installed 1959</td>
</tr>
</tbody>
</table>

Emission / Operational Limitations:
1) The permittee shall control emissions from each EP02, EP03, and EP04 (Tanks #2, #3, and #4) gasoline storage vessel in accordance with the applicable provisions of 40 CFR Part 63, Subpart BBBB, Table 2. [§63.11088(a)]
2) The permittee shall continue to control emissions from EP02, EP03, and EP04 using the specified floating roofs and seals for internal floating roofs described in 40 CFR 60 Subpart Kb. The permittee shall comply with the specified floating roofs and seals requirements for internal floating roof tanks described in 40 CFR 63 Subpart WW (Attachment F).

Equipment / Procedural Requirements:
Internal Floating Roof, §63.11087 and §60.112b(a)(1):
The permittee shall ensure that the EP02, EP03, and EP04 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: [§60.112b(a)]

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. [§60.112b(a)(1)(i)]

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: [§60.112b(a)(1)(ii)]
   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. [§60.112b(a)(1)(ii)(A)]
   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. [§60.112b(a)(1)(ii)(C)]

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. [§60.112b(a)(1)(iii)]

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 EP02, EP03, and EP04 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. [§60.113b(a)(1)]
      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 §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. [§60.113b(a)(2)]
      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 §60.113b(a)(2). [§60.113b(a)(4)]

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 §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 §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. [§60.113b(a)(5)]

5. The permittee shall keep a record of each inspection performed as required in §60.113b(a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment including seals, internal floating roof, and fittings. These records shall be maintained onsite for a minimum of five years. [§60.115b(a)(2)]

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 EP02, EP03, and EP04 storage vessels. These records shall be maintained onsite for the life of each tank or a minimum of five years, whichever is longer. [§60.116b(b)]
   b) The permittee shall maintain all records onsite for a minimum of 5 years unless a longer period is specified with the requirement.
   c) 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 Missouri Air Compliance Coordinator at EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219 and send copies to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or by email to AirComplianceReporting@dnr.mo.gov as applicable for the EP02, EP03, and EP04 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. [§63.11093(b)]
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 Director/Administrator to review and approve the site-specific test plan required under §63.7(c), if requested by the Director/Administrator, and to have an observer present during the test.

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

2) \textbf{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 Missouri Air Compliance Coordinator at EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219 (and send copies to Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or by email to AirComplianceReporting@dnr.mo.gov) as applicable for the EP02 internal floating roof tank:

b) After installing the internal floating roof as described in §60.112b(a)(1), 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. [§60.115b(a)(1)]

c) If any of the conditions described in §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. [§60.115b(a)(3)]

3) \textbf{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).I.C.(III) and Section V of this permit. These reports shall also be submitted to the Missouri Air Compliance Coordinator at EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219.

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP10</td>
<td>Tank #10: 294 gallons, horizontal fixed roof tank, installed 1995</td>
</tr>
</tbody>
</table>

\textbf{PERMIT CONDITION 005}

10 CSR 10-6.060 Construction Permits Required

Construction Permit 0697-013, issued July 25, 1997

\textbf{Operational Limitations:}

1) The permittee shall limit the throughput of EP10 (Tank #10) to 365 barrels of any petroleum product in any consecutive 12-month period. [Special Condition 4]

2) The permittee shall not store any liquid in EP10 (Tank #10) that has a true vapor pressure greater than unleaded gasoline (RVP10). [Special Condition 7]

\textbf{Monitoring/Recordkeeping Requirements:}

1) The permittee shall maintain records of the petroleum liquid(s) stored in EP10 (Tank #10) using the log shown in Attachment D or an equivalent created by the permittee. These records shall contain the following information: [Special Condition 5]
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. [Special Condition 5]

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:**

2) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or by email to AirComplianceReporting@dnr.mo.gov, 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.

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.

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**PERMIT CONDITION 006**

10 CSR 10-6.065 Operating Permits (Voluntary Limitations)

<table>
<thead>
<tr>
<th>Emission Point</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP01</td>
<td>Tank #1: 1.512 Million Gallon Internal Floating Roof Gasoline Tank</td>
</tr>
<tr>
<td>EP02</td>
<td>Tank #2: 0.714 Million Gallon Internal Floating Roof Gasoline Tank</td>
</tr>
<tr>
<td>EP03</td>
<td>Tank #3: 0.966 Million Gallon Vertical Domed External Floating Roof Gasoline Tank</td>
</tr>
<tr>
<td>EP04</td>
<td>Tank #4: 0.966 Million Gallon Vertical Domed External Floating Roof Gasoline Tank</td>
</tr>
<tr>
<td>EP05</td>
<td>Tank #5: 4.830 Million Gallon Internal Floating Roof Gasoline Tank</td>
</tr>
</tbody>
</table>

**Emission / Operational Limitation:**
The permittee may store gasoline or documented lower vapor pressure products (less than RVP 14.3) in Tanks #1 – #5 (EP01, EP02, EP03, EP04, and EP05).

**Monitoring / Recordkeeping Requirements:**

1) The permittee shall maintain records of the petroleum liquid(s) stored in EP01, EP02, EP03, EP04, and EP05 (Tanks #1 – #5) using the log shown in Attachment C 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.

<table>
<thead>
<tr>
<th>PERMIT CONDITION 007</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants</td>
</tr>
<tr>
<td>Emission Point</td>
</tr>
<tr>
<td>EP07</td>
</tr>
</tbody>
</table>

**Emission Limitation:**
1) The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20 percent for any continuous six-minute period. [10 CSR 10-6.220(3)(A)1]
2) Exception: The permittee may discharge into the atmosphere from any emission unit visible emissions with an opacity up to 60 percent for one continuous six-minute period in any 60 minutes. [10 CSR 10-6.220(3)(A)2]
3) Failure to demonstrate compliance with 10 CSR 10-6.220(3)(A) solely because of the presences of uncombined water shall not be a violation. [10 CSR 10-6.220(3)(B)]

**Monitoring/Recordkeeping:**
Not required. See Statement of Basis.

**Reporting:**
1) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

<table>
<thead>
<tr>
<th>PERMIT CONDITION 008</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 CSR 10-6.065 Operating Permits (Voluntary Limitations)</td>
</tr>
<tr>
<td>Emission Point</td>
</tr>
<tr>
<td>EP11</td>
</tr>
<tr>
<td>EP13</td>
</tr>
</tbody>
</table>

**Operational Limitation:**
The permittee shall limit the throughput of ethanol through both tanks to 8,000,000 gallons during any consecutive 12-month period.

**Monitoring / Recordkeeping Requirements:**
1) The permittee shall maintain accurate monthly and consecutive 12-month totals of ethanol throughput using Attachment G or an equivalent form.
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:**
1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or by email to AirComplianceReporting@dnr.mo.gov, no later than ten days after the end of the month, if the consecutive 12-month total records show that the source exceeded the operational limitation.

2) The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program’s Compliance/Enforcement Section at P.O. Box 176, Jefferson City, Missouri 65102 or AirComplianceReporting@dnr.mo.gov as required by Section V of this permit.
IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The following are only excerpts from the regulation or code, and are provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.

2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

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) 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 to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity 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, notice shall be given as soon as practicable prior to the activity.

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. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

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

1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.

2) 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.

3) 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.

### 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 10-6.165 Restriction of Emission of Odors

This requirement is a State Only permit requirement.

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 odor evaluation shall be taken at a location outside of the installation’s property boundary.
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.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.

2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.

3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-6.280 Compliance Monitoring Usage

1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
   c) Any other monitoring methods approved by the director.

2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the
following methods is presumptively credible evidence of whether a violation has occurred at an installation:

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”; and
   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.

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)

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 40 CFR §82.106.

b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.

c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.

d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §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 of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.

d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. (“MVAC-like” appliance as defined at 40 CFR §82.152).

e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §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 40 CFR §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 contained 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. \textit{Federal Only - 40 CFR Part 82.}
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,

<table>
<thead>
<tr>
<th>10 CSR 10-6.065(6)(C)1.B Permit Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 CSR 10-6.065(6)(E)3.C Extension of Expired Permits</td>
</tr>
</tbody>
</table>

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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

| 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, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.
   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.
   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. 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.

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)
If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

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)1.1 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, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and 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 applicable 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 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, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, 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, Compliance and Enforcement Section, P.O. Box 176,
Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219,
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 APCP shall place a copy with the permit in the public
file. Written notice shall be provided to the EPA and the APCP 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 APCP 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 permit, 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 contemporaneous written notice of the change to the Air Pollution
Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO
65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall
not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this
rule. 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)34 Responsible Official

The application utilized in the preparation of this permit was signed by Dudley Tarlton, V.P. of ESOH.
On July 24, 2018, the Air Pollution Control Program was informed that Lorne Allcock, Director of
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 shall be reopened for cause if:

1) The Missouri Department of Natural Resources (MoDNR) 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) MoDNR 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) MoDNR 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.
### Inspection/Maintenance/Repair/Malfunction Log

<table>
<thead>
<tr>
<th>Date/Time</th>
<th>Inspection/Maintenance Activities</th>
<th>Malfunction</th>
<th>Impact</th>
<th>Duration</th>
<th>Cause</th>
<th>Action</th>
<th>Initials</th>
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</table>
Attachment B
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.

<table>
<thead>
<tr>
<th>Month / Year</th>
<th>Material Shipped</th>
<th>Volume Shipped (gallons)</th>
<th>12-month Rolling Total (gallons)</th>
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<tbody>
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<td>12-month Rolling Total not to exceed 350,000,000 gallons</td>
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<td>Total All:</td>
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<td>12-month Rolling Total not to exceed 350,000,000 gallons</td>
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<td>Total All:</td>
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<td>12-month Rolling Total not to exceed 350,000,000 gallons</td>
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<td>Total All:</td>
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</table>
Attachment C
Petroleum Product Storage Log for Tanks #1 through #5

This record keeping sheet or something similar may be used to show compliance with 40 CFR 60.116b(c).

1. Record the product and the period of storage for each petroleum product stored in Tank #1 through #5.
2. Whenever any product with a maximum true vapor pressure of ≥ 3.5 kPa (0.51 psia) is stored, record the maximum liquid storage temperature and the maximum true vapor pressure during the storage period.

<table>
<thead>
<tr>
<th>Tank # / EU #</th>
<th>Petroleum Product Stored</th>
<th>Begin Date</th>
<th>End Date</th>
<th>Maximum Daily Storage Temperature (°F)</th>
<th>Maximum Daily True Vapor Pressure (psia)</th>
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### Attachment D

**Petroleum Product Throughput Log for Tank #10**

*This record keeping sheet or something similar may be used to show compliance with permit condition 005. Record each material stored and the throughput in barrels during each month.*

<table>
<thead>
<tr>
<th>Month / Year</th>
<th>Material Stored</th>
<th>Throughput (bbl)</th>
<th>12-month Rolling Total (bbl)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>12-month Rolling Total not to exceed 365 bbl</td>
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<td>Total All:</td>
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<td>12-month Rolling Total not to exceed 365 bbl</td>
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<td>Total All:</td>
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<td>12-month Rolling Total not to exceed 365 bbl</td>
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<td>Total All:</td>
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</tbody>
</table>
### Attachment E
#### Leak Inspection Log Sheet

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

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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 A).

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 A).
Attachment F

Permit Conditions for Tanks Subject to 40 CFR Part 63 Subpart BBBBBB that elect to control emissions using an Internal Floating Roof according to the requirements of 40 CFR Part 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. [§63.1063(a)(1)(i)]
   a) A liquid-mounted seal. [§63.1063(a)(1)(i)(A)]
   b) A mechanical shoe seal. [§63.1063(a)(1)(i)(B)]
   c) Two seals mounted one above the other. The lower seal may be vapor-mounted. [§63.1063(a)(1)(i)(C)]

2) Each IFR must meet the following operational requirements: [§63.1063(b)]
   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). [§63.1063(b)(1)]
   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. [§63.1063(b)(2)]
   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. [§63.1063(b)(3)]
   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. [§63.1063(b)(4)]
   e) Each unslotted guidepole cap shall be closed at all times except when gauging the liquid level or taking liquid samples. [§63.1063(b)(5)]

**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 §63.1063(a)(1). Any of the conditions described below constitutes an inspection failure: [§63.1063(d)(1)]
      1. Stored liquid on the floating roof. [§63.1063(d)(1)(i)]
      2. Holes or tears in the primary or secondary seal (if one is present). [§63.1063(d)(1)(ii)]
3. Floating roof deck, deck fittings, or rim seals that are not functioning as designed as specified in §63.1063(a). [§63.1063(d)(1)(iii)]

4. Failure to comply with the operational requirements of §63.1063(b). [§63.1063(d)(1)(iv)]

5. Gaps of more than 0.32 centimeters (¼ inch) between any deck fitting gasket, seal, or wiper required by §63.1063(a)(1), and any surface that it is intended to seal. [§63.1063(d)(1)(v)]

b) The permittee shall perform subsequent inspections according to the following schedule:

[§63.1063(e)]

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 §63.1063(d)(1)(i) through (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. [§63.1063(c)(1)(i)(A)]

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 §63.1063(d)(1). [§63.1063(c)(1)(i)(B)]

Instead of the inspection frequency specified in §63.1063(c)(1)(i), internal floating roof tanks with two rim seals may be inspected as specified in §63.1063(d)(1) each time the storage vessel is completely emptied and degassed, or every 5 years, whichever occurs first. [§63.1063(c)(1)(ii)]

c) The permittee shall repair conditions causing inspection failures under paragraph 1) of this section as specified below: [§63.1063(e)]

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. [§63.1063(e)(1)]

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. [§63.1063(e)(2)]

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 §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 §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 Compliance/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 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.

   b) 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.

   c) 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:

1) The permittee shall submit the following reports to the Air Pollution Control Program’s Compliance/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 initial startup of the tank as equipped with the control equipment that meets the specifications.

   b) If inspection failures described in §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 §63.1063(e)(2).

**General, All:**
1) 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 G
Ethanol Throughput Tracking Log

<table>
<thead>
<tr>
<th>Date (Month/Year)</th>
<th>Monthly Ethanol Throughput(^4) (gal)</th>
<th>Consecutive 12-Month Total of Ethanol Throughput(^5) (gal)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

\(^4\) Ethanol throughput through Tanks 11 and 13.

\(^5\) A consecutive 12-month total of 8,000,000 gallons or less indicates compliance with Permit Condition 008.
STATEMENT OF BASIS

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, 2 ethanol tanks, transmix tanks, Tank 12 (closed loop oil/water system), 3 additive tanks and a truck loading rack. The facility brings in product predominately through pipeline, but product can also arrive by truck. The products are stored in the various storage tanks. The product can leave the facility by pipeline or by truck. When the product is loaded to trucks at the facility, then there is a vapor combustion unit at the loading rack to control emissions when loading gasoline. Volatile organic compound (VOC) emissions result from bulk storage and the transfer, loading & unloading of gasoline, diesel fuel and ethanol. The installation is a synthetic minor source of criteria air pollutants due the gallon limitation in Permit Condition PW001. This installation is on the List of Named Installations per 10 CSR 10-6.020, Definitions and Common Reference Tables.

While the installation qualifies for an intermediate source operating permit, the permittee requests to remain a Part 70 source. Historically, this installation was once a major source of criteria pollutants with a required Part 70 when it was determined to be one installation with the nearby ConocoPhillips terminal for permitting purposes. However, since then TransMontaigne has cut ties with ConocoPhillips and is thus no longer considered one installation with ConocoPhillips. After cutting ties with ConocoPhillips, TransMontaigne accepted voluntary limitations that classified them as a minor source of criteria pollutants.

Updated Potential to Emit for the Installation

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Potential to Emit (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Volatile Organic Compounds (VOCs)</td>
<td>81.59</td>
</tr>
<tr>
<td>Hazardous Air Pollutants (HAPs)</td>
<td>4.29</td>
</tr>
<tr>
<td>Benzene</td>
<td>0.81</td>
</tr>
<tr>
<td>Cumene</td>
<td>&lt; 0.01</td>
</tr>
<tr>
<td>Ethyl Benzene</td>
<td>0.09</td>
</tr>
<tr>
<td>n-Hexane</td>
<td>1.31</td>
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<tr>
<td>Isooctane</td>
<td>0.61</td>
</tr>
<tr>
<td>Toluene</td>
<td>1.05</td>
</tr>
<tr>
<td>Xylene</td>
<td>0.42</td>
</tr>
</tbody>
</table>

6 Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted. The installation is a synthetic minor source. See 40 CFR Part 63, Subpart R discussion in the statement of basis to see a PTE breakdown.
Reported Air Pollutant Emissions, tons per year

<table>
<thead>
<tr>
<th></th>
<th></th>
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<th></th>
<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td>Nitrogen Oxides (NO₂)</td>
<td>-</td>
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<td>-</td>
<td>-</td>
<td>0.02</td>
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<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>7.66</td>
<td>7.09</td>
<td>7.21</td>
<td>8.63</td>
<td>8.71</td>
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<tr>
<td>Carbon Monoxide (CO)</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.05</td>
</tr>
<tr>
<td>Hazardous Air Pollutants (HAPs)</td>
<td>&lt; 0.01</td>
<td>0.32</td>
<td>0.32</td>
<td>0.44</td>
<td>0.50</td>
</tr>
</tbody>
</table>

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 November 14, 2014;
2) 2017 Emissions Inventory Questionnaire, received April 18, 2018;
4) Construction Permit #0697-013, Issued July 25, 1997;
5) Construction Permit #0697-014, Issued July 25, 1997;
6) Construction Permit #0698-015, Issued June 1, 1998.

Construction Permit History
1) Construction Permit #0697-013, Issued July 25, 1997:
This permit was issued for the installation of a 294-gallon fixed roof horizontal storage tank. 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.
Permit Condition 5 requires use of the VDU during product loading. This was modified in this operating permit to during gasoline loading. This construction permit’s PTE was evaluated without applying controls to diesel loading, so it can be assumed the intention was to apply to gasoline. While the tracking sheets apply a control efficiency to the diesel loading emissions, this is assumed to be a typo. If the permittee loads diesel they shall not apply a control efficiency to the emissions.

2) Construction Permit #0697-014, Issued July 25, 1997:
This permit was issued for the installation of two bay petroleum products loading rack. 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 permit condition 002 in the event that the installation wishes to conduct a subsequent performance test.

3) Construction Permit #0698-015, Issued June 1, 1998:
This permit was issued for the installation of a 15,000 gallon horizontal fixed roof tank to store and load ethanol. Under Applicable Requirements, item III stated that 40 CFR Part 60 Subpart Kb was applicable to the 15,000 gallon storage tank (EP11). 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 to storage tanks with a capacity of greater than or equal to 75 m³. Therefore, Subpart Kb is no longer applicable to EP11.

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.


1) This rule was determined to be applicable to EP01 and EP05 [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 Condition 003 includes 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) Permit condition 003 includes 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 60.116b(c) were included as item 2 under Monitoring / Recordkeeping Requirements and an example form included in Attachment C.
   c) 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 EP02, EP03 or EP04 [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 EP02, EP03 or EP04 tanks to be subject to Subpart Kb.

3) This rule was determined not to be applicable to the additive tanks [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 EP10, EP11, or EP13 [Tanks #10, #11, #13]. 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 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.

6) This rule is not applicable to EP02, EP03, and EP04. Under OP2000-073, MACT R was applied to these tanks, which required them to comply with the specified requirements of Subpart Kb. However, MACT R was determined to not be applicable – potential HAPs are below major levels. As a result, Kb no longer applies to these tanks.

40 CFR Part 60 Subpart XX – Standards of Performance for Bulk Gasoline Terminals
1) This rule was determined to be applicable to EP07 [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 002.

   a) Under the terms of 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 OP2010-041, 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 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 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 Achievable Control Technology (MACT) Applicability


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 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 OP2000-073, 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:

   \[
   2 \text{ (truck bays)} \times 4 \text{ (trucks/bay/hour)} \times 8,000 \text{ (gallons/truck)} \times 8,760 \text{ (hours/year)} = 560,640,000 \text{ gallons of gasoline per year.}
   \]

   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:

   \[
   560,640,000 \text{ (gallons gasoline shipped via loading racks)} + 350,000,000 \text{ (gallons gasoline shipped via the pipeline)} = 910,640,000 \text{ gallons gasoline per year.}
   \]

   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 EP01, Tank #1, is:

   \[
   910,640,000 \text{ (gallons gasoline per year)} \times 1,512,000 \text{ (gallons capacity)} / 8,988,000 \text{ (gallons aggregate storage capacity)} = 153,191,776 \text{ gallons gasoline stored in EP01 per year.}
   \]

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:

   \[
   2 \text{ (truck bays)} \times 3 \text{ (trucks/bay/hour)} \times 8,000 \text{ (gallons/truck)} \times 8,760 \text{ (hours/year)} = 420,480,000 \text{ gallons of diesel per year.}
   \]

   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 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 EP01, Tank #1, is:

   \[
   770,480,000 \text{ (gallons diesel per year)} \times 1,512,000 \text{ (gallons capacity)} / 8,988,000 \text{ (gallons aggregate storage capacity)} = 129,613,458 \text{ gallons diesel stored in EP01 per year.}
   \]

3) The maximum throughput for the additive tanks (Tanks #7, 8, and 9) 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 \text{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 \text{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 (EP10) 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 throughput for ethanol in Tanks #11 (EP11) and #13 is based on the 8,000,000 gallons throughput limitation in Permit Condition 008. For the sake of PTE calculations, this limitation was divided between them.

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

### TABLE 1 – Maximum Potential Throughput for Each Storage Tank

<table>
<thead>
<tr>
<th>Emission Point No.</th>
<th>Equipment Name</th>
<th>Tank Dimensions H x D (ft)</th>
<th>Capacity (gallons)</th>
<th>Equipment Specifications</th>
<th>Roof Type</th>
<th>Maximum Potential Throughput (gallons/year)</th>
<th>Gasoline</th>
<th>Diesel (Distillate #2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP01</td>
<td>Tank #1</td>
<td>40 x 80</td>
<td>1,512,000</td>
<td>Internal Floating Roof</td>
<td></td>
<td>153,191,776</td>
<td>129,613,458</td>
<td></td>
</tr>
<tr>
<td>EP02</td>
<td>Tank #2</td>
<td>50 x 50</td>
<td>714,000</td>
<td>Internal Floating Roof</td>
<td></td>
<td>72,340,561</td>
<td>61,206,355</td>
<td></td>
</tr>
<tr>
<td>EP03</td>
<td>Tank #3</td>
<td>48 x 60</td>
<td>966,000</td>
<td>Domed External Floating Roof</td>
<td></td>
<td>97,872,523</td>
<td>82,808,598</td>
<td></td>
</tr>
<tr>
<td>EP04</td>
<td>Tank #4</td>
<td>48 x 60</td>
<td>966,000</td>
<td>Domed External Floating Roof</td>
<td></td>
<td>97,872,523</td>
<td>82,808,598</td>
<td></td>
</tr>
<tr>
<td>EP05</td>
<td>Tank #5</td>
<td>49 x 130</td>
<td>4,830,000</td>
<td>Internal Floating Roof</td>
<td></td>
<td>489,362,617</td>
<td>414,042,991</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>910,640,000</td>
<td>420,480,000</td>
<td></td>
</tr>
</tbody>
</table>

- Tank #7 12 x 5.5 2,142 Horizontal Fixed Roof Additive: 207,437
- Tank #8 12 x 5.5 2,142 Horizontal Fixed Roof Additive: 82,470
- Tank #9 6 x 4 546 Horizontal Fixed Roof Additive: 22,201
EP10 Tank #10 8 x 3 294 Horizontal Fixed Roof Transmix: 15,330
EP11 Tank #11 28 x 10 15,000 Horizontal Fixed Roof Ethanol: 4,000,000
EP13 Tank #13 28 x 10 15,000 Horizontal Fixed Roof Ethanol: 4,000,000

### TABLE 2 – Maximum Potential Throughput for Loading Racks and Piping

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Equipment Name</th>
<th>Description</th>
<th>Maximum Potential Throughput (gallons/year)</th>
<th>Gasoline</th>
<th>Diesel (Distillate #2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP07</td>
<td>Loading Rack</td>
<td>2-Bay Loading Rack, used for loading gasoline, diesel, additives, and ethanol. VDU controls emissions from all materials.</td>
<td>560,640,000</td>
<td>420,480,000</td>
<td></td>
</tr>
<tr>
<td>FUG</td>
<td>Fugitives</td>
<td>Truck vapor transit losses</td>
<td>560,640,000</td>
<td>420,480,000</td>
<td></td>
</tr>
<tr>
<td>FUG</td>
<td>Fugitives</td>
<td>Fugitive emissions from equipment leaks (valves, pumps, fittings, etc.)</td>
<td>8,760 hours / Light liquid</td>
<td>8,760 hours / Light liquid</td>
<td></td>
</tr>
</tbody>
</table>
7) 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 Tanks4.0.9d. Gasoline emissions were based on a worst case scenario of Gasoline RVP 14.3, except for EP10 (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/10^3 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 / 10^3 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; \(MW = 130 \text{ lb/lb-mole}\); and \(T = 528 \text{ °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 / 10^3 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 / 10^3 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 on 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.
TABLE 3 – Fugitive Emissions from Equipment Leaks

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

8) 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.

TABLE 4 – HAP Emission Factors

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

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.*
<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Total VOC</th>
<th>Total HAP</th>
<th>Benzene</th>
<th>Cumene</th>
<th>Ethyl Benzene</th>
<th>n-Hexane</th>
<th>Isooctane</th>
<th>Toluene</th>
<th>Xylene</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP01 / Tank #1</td>
<td>6.63</td>
<td>0.34</td>
<td>0.06</td>
<td>0.00</td>
<td>0.01</td>
<td>0.11</td>
<td>0.05</td>
<td>0.09</td>
<td>0.03</td>
</tr>
<tr>
<td>EP02 / Tank #2</td>
<td>4.00</td>
<td>0.21</td>
<td>0.04</td>
<td>0.00</td>
<td>0.00</td>
<td>0.06</td>
<td>0.03</td>
<td>0.05</td>
<td>0.02</td>
</tr>
<tr>
<td>EP03 / Tank #3</td>
<td>0.75</td>
<td>0.04</td>
<td>0.01</td>
<td>0.00</td>
<td>0.00</td>
<td>0.01</td>
<td>0.01</td>
<td>0.01</td>
<td>0.00</td>
</tr>
<tr>
<td>EP04 / Tank #4</td>
<td>0.75</td>
<td>0.04</td>
<td>0.01</td>
<td>0.00</td>
<td>0.00</td>
<td>0.01</td>
<td>0.01</td>
<td>0.01</td>
<td>0.00</td>
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<tr>
<td>EP05 / Tank #5</td>
<td>9.56</td>
<td>0.50</td>
<td>0.09</td>
<td>0.00</td>
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<tr>
<td>Tank #8</td>
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<td>0.00</td>
<td>0.00</td>
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<tr>
<td>Tank #9</td>
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<td>0.00</td>
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<tr>
<td>EP10 / Tank #10</td>
<td>0.09</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
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<td>0.00</td>
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<tr>
<td>EP11 / Tank #11</td>
<td>1.00</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
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<tr>
<td>EP13 / Tank #13</td>
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<td>0.00</td>
<td>0.00</td>
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<td>0.00</td>
<td>0.00</td>
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<tr>
<td>EP07 / 2-Bay Loading Rack</td>
<td>23.39</td>
<td>1.22</td>
<td>0.21</td>
<td>0.00</td>
<td>0.02</td>
<td>0.37</td>
<td>0.19</td>
<td>0.30</td>
<td>0.12</td>
</tr>
<tr>
<td>FUG / Fugitive (Equipment)</td>
<td>0.09</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
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</tr>
<tr>
<td>FUG / Fugitive (Cargo)</td>
<td>30.41</td>
<td>1.58</td>
<td>0.27</td>
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<td>0.03</td>
<td>0.49</td>
<td>0.24</td>
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<tr>
<td><strong>TOTAL</strong></td>
<td><strong>77.69</strong></td>
<td><strong>3.93</strong></td>
<td><strong>0.68</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.08</strong></td>
<td><strong>1.21</strong></td>
<td><strong>0.61</strong></td>
<td><strong>0.98</strong></td>
<td><strong>0.38</strong></td>
</tr>
<tr>
<td>Emission Unit</td>
<td>Total VOC</td>
<td>Total HAP</td>
<td>Benzene</td>
<td>Cumene</td>
<td>Ethyl Benzene</td>
<td>n-Hexane</td>
<td>Isooctane</td>
<td>Toluene</td>
<td>Xylene</td>
</tr>
<tr>
<td>--------------</td>
<td>-----------</td>
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<td>---------------</td>
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<td>---------</td>
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</tr>
<tr>
<td>EP01 / Tank #1</td>
<td>0.20</td>
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<td>EP02 / Tank #2</td>
<td>0.15</td>
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<td>Tank #9</td>
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<td>0.00</td>
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<td>EP11 / Tank #11</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>EP07 / 2-Bay Loading Rack</td>
<td>0.16</td>
<td>0.03</td>
<td>0.01</td>
<td>0.00</td>
<td>0.00</td>
<td>0.01</td>
<td>0.00</td>
<td>0.01</td>
<td>0.00</td>
</tr>
<tr>
<td>FUG / Fugitive (Equipment)</td>
<td>0.09</td>
<td>0.02</td>
<td>0.01</td>
<td>0.00</td>
<td>0.00</td>
<td>0.01</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>FUG / Fugitive (Cargo)</td>
<td>0.03</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>3.90</strong></td>
<td><strong>0.36</strong></td>
<td><strong>0.13</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.01</strong></td>
<td><strong>0.10</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.07</strong></td>
<td><strong>0.04</strong></td>
</tr>
</tbody>
</table>

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.


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.

<table>
<thead>
<tr>
<th>Equipment / Emission Point ID</th>
<th>Roof Configuration</th>
<th>In Gasoline Service?</th>
<th>Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tank #1 / EP01</td>
<td>Internal Floating Roof</td>
<td>Yes</td>
<td>Per permit condition PW001: Tanks #1 - 5 may store gasoline or lower vapor pressure products.</td>
</tr>
<tr>
<td>Tank #2 / EP02</td>
<td>Internal Floating Roof</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Tank #3 / EP03</td>
<td>Domed External Floating Roof</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Tank #4 / EP04</td>
<td>Domed External Floating Roof</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Tank #5 / EP05</td>
<td>Internal Floating Roof</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Tank #7 / EP07</td>
<td>Horizontal Fixed Roof</td>
<td>No</td>
<td>Tanks store additives, which are not defined as gasoline.</td>
</tr>
<tr>
<td>Tank #8</td>
<td>Horizontal Fixed Roof</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Tank #9</td>
<td>Horizontal Fixed Roof</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Tank #10 / EP10</td>
<td>Horizontal Fixed Roof</td>
<td>No</td>
<td>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. Transmix is not defined as gasoline.</td>
</tr>
<tr>
<td>Tank #11 / EP11</td>
<td>Horizontal Fixed Roof</td>
<td>No</td>
<td>Tank stores ethanol, which is not defined as gasoline.</td>
</tr>
</tbody>
</table>
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 BBBB in §63.11089. However, under the recordkeeping requirements for Subpart BBBB 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 PW002.

2) Storage tanks #1, #2, #3, #4, and #5 are subject to the control and management requirements of §63.11087. Table 1 to Subpart BBBB 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

<table>
<thead>
<tr>
<th>Control Requirement</th>
<th>Applicable Section of Rule</th>
<th>Specified Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operating</td>
<td>§ 63.11087 and Table 1 to Subpart BBBBBB of Part 63</td>
<td>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.</td>
</tr>
</tbody>
</table>

**1. Control Option for Tanks < 75 m³ Capacity:** All tanks in gasoline service with a capacity of less than 75 m³ (19,813 gallons) are subject to the following control requirements:

1. **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 m³ (19,813 gallons) are subject to one of the following control requirements, depending on the roof configuration:
   - 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**

<table>
<thead>
<tr>
<th>Control Requirement</th>
<th>Applicable Section of Rule</th>
<th>Applicable Referenced Section(s) of 40 CFR Part 60, Subpart Kb</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operating</td>
<td>§ 63.11087 and Table 1 to Subpart BBBBBB of Part 63</td>
<td>§ 63.11092, § 63.11094, § 63.11095</td>
</tr>
<tr>
<td>Monitoring</td>
<td>§ 63.11092</td>
<td>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). 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. Keep records as specified in 40 CFR 60.115b (c) and (d), except records shall be kept for at least 5 years. Report information as specified in 40 CFR 60.115b (c) and (d).</td>
</tr>
<tr>
<td>Recordkeeping</td>
<td>§ 63.11094</td>
<td>Perform inspections of the floating roof system according to the requirements of 40 CFR 60.113b(a). Keep records as specified in 40 CFR 60.115b (a), except records shall be kept for at least 5 years. Report information as specified in 40 CFR 60.115b (a).</td>
</tr>
<tr>
<td>Reporting</td>
<td>§ 63.11095</td>
<td></td>
</tr>
</tbody>
</table>

**Option 2(b) – Control emissions using an internal floating roof installed and operated as described in 40 CFR Part 60, Subpart Kb**

<table>
<thead>
<tr>
<th>Control Requirement</th>
<th>Applicable Section of Rule</th>
<th>Applicable Referenced Section(s) of 40 CFR Part 60, Subpart Kb</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operating</td>
<td>§ 63.11087 and Table 1 to Subpart BBBBBB of Part 63</td>
<td>§ 63.11092, § 63.11094, § 63.11095</td>
</tr>
<tr>
<td>Monitoring</td>
<td>§ 63.11092</td>
<td>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). [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 60.112 and the associated inspections and recordkeeping requirements in 40 CFR 60.113b(a) and 40 CFR 60.115b are required.] Perform inspections of the floating roof system according to the requirements of 40 CFR 60.113b(a). Keep records as specified in 40 CFR 60.115b (a), except records shall be kept for at least 5 years. Report information as specified in 40 CFR 60.115b (a).</td>
</tr>
<tr>
<td>Recordkeeping</td>
<td>§ 63.11094</td>
<td></td>
</tr>
<tr>
<td>Reporting</td>
<td>§ 63.11095</td>
<td></td>
</tr>
</tbody>
</table>

**Option 2(c) – Control emissions using an external floating roof installed and operated as described in 40 CFR Part 60, Subpart Kb**

<table>
<thead>
<tr>
<th>Control Requirement</th>
<th>Applicable Section of Rule</th>
<th>Applicable Referenced Section(s) of 40 CFR Part 60, Subpart Kb</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operating</td>
<td>§ 63.11087 and Table 1 to Subpart BBBBBB of Part 63</td>
<td>§ 63.11092, § 63.11094, § 63.11095</td>
</tr>
<tr>
<td>Monitoring</td>
<td>§ 63.11092</td>
<td></td>
</tr>
<tr>
<td>Recordkeeping</td>
<td>§ 63.11094</td>
<td></td>
</tr>
<tr>
<td>Reporting</td>
<td>§ 63.11095</td>
<td></td>
</tr>
</tbody>
</table>
### TABLE 8 – Control Options Available for Storage Tanks based on Table 1 to Subpart BBBB BBB

<table>
<thead>
<tr>
<th>Control Requirement</th>
<th>Applicable Section of Rule</th>
<th>Applicable Referenced Section(s) of 40 CFR Part 63, Subpart WW</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operating</td>
<td>§ 63.11087 and Table 1 to Subpart BBBB BBB of Part 63</td>
<td>• 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).</td>
</tr>
<tr>
<td>Monitoring</td>
<td>§ 63.11092</td>
<td>• Perform inspections of the floating roof system according to the requirements of 40 CFR 60.113b(b).</td>
</tr>
<tr>
<td>Recordkeeping</td>
<td>§ 63.11094</td>
<td>• Keep records as specified in 40 CFR 60.115b(b), except records shall be kept for at least 5 years.</td>
</tr>
<tr>
<td>Reporting</td>
<td>§ 63.11095</td>
<td>• Report information as specified in 40 CFR 60.115b(b).</td>
</tr>
</tbody>
</table>

**Option 2(d)(1) – Control emissions using an internal floating roof installed and operated as described in 40 CFR Part 63, Subpart WW**

<table>
<thead>
<tr>
<th>Control Requirement</th>
<th>Applicable Section of Rule</th>
<th>Applicable Referenced Section(s) of 40 CFR Part 63, Subpart WW</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operating</td>
<td>§ 63.11087 and Table 1 to Subpart BBBB BBB of Part 63</td>
<td>• Equip and operate each internal floating roof gasoline storage tank according to the applicable requirements in 40 CFR 63.1063(a)(1) and (b).</td>
</tr>
<tr>
<td>Monitoring</td>
<td>§ 63.11092</td>
<td>• Perform inspections of the floating roof system according to the requirements of 40 CFR 63.1063(c)(1).</td>
</tr>
<tr>
<td>Recordkeeping</td>
<td>§ 63.11094</td>
<td>• Keep records as specified in 40 CFR 63.1065.</td>
</tr>
<tr>
<td>Reporting</td>
<td>§ 63.11095</td>
<td>• Report information as specified in 40 CFR 63.1066.</td>
</tr>
</tbody>
</table>

**Option 2(d)(2) – Control emissions using an external floating roof installed and operated as described in 40 CFR Part 63, Subpart WW**

<table>
<thead>
<tr>
<th>Control Requirement</th>
<th>Applicable Section of Rule</th>
<th>Applicable Referenced Section(s) of 40 CFR Part 63, Subpart WW</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operating</td>
<td>§ 63.11087 and Table 1 to Subpart BBBB BBB of Part 63</td>
<td>• Equip and operate each internal and external floating roof gasoline storage tank according to the applicable requirements in 40 CFR 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).</td>
</tr>
<tr>
<td>Monitoring</td>
<td>§ 63.11092</td>
<td>• Perform inspections of the floating roof system according to the requirements of 40 CFR 63.1063(c)(2).</td>
</tr>
<tr>
<td>Recordkeeping</td>
<td>§ 63.11094</td>
<td>• Keep records as specified in 40 CFR 63.1065.</td>
</tr>
<tr>
<td>Reporting</td>
<td>§ 63.11095</td>
<td>• Report information as specified in 40 CFR 63.1066.</td>
</tr>
</tbody>
</table>

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 006.

b) EP01 and EP05 (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 003.

Since EP01 and EP05 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 BBBB BBBB for either tank unless the tank(s) continues to comply with the requirements of Subpart Kb.

c) 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 ≥ 75 m³, EP02 (Tank #2), and the
domed external floating roof tanks at the installation with a capacity of ≥ 75 m³, EP03 and EP04 (Tank #3 and Tank #4) in permit condition 004.

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 §60.111(b).

Under operating permit OP2000-073, these tanks were determined to be subject to 40 CFR Part 63 Subpart R. Subpart R required compliance with specified regulations from Subpart Kb. Subpart R no longer applies, and thus tanks EP02, EP03, and EP04 no longer are required to comply with 40 CFR Part 60 Subpart Kb.

d) The requirements in Option 2(c) of Table 8 are an available control option for vertical storage tanks with a capacity of ≥ 75 m³ to control emissions by operating a new or existing external floating roof that meets the specified requirements of 40 CFR Part 60 Subpart Kb.

The domed external floating roof tanks at this installation are not subject to the requirements of 40 CFR Part 60, Subpart Kb. Therefore, no permit conditions referencing this option were included in the operating permit.

e) 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 ≥ 75 m³ 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 F. 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 condition 004.

f) 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 ≥ 75 m³ 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 per 40 CFR Part 63, Subpart WW 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 Subpart BBBBBB 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 Subpart BBBBBB 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 001, along with the Compliance Assurance Monitoring requirements. The regulatory monitoring requirements of §63.11092 were included in permit condition 002.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability
In the permit application and according to APCP 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.

Missouri Code of State Regulations (CSR) Applicability

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.

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)
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 Mount Vernon Terminal via the pipeline to the Rogers Arkansas Terminal. Plant-wide permit condition PW001 therefore establishes this as a voluntary limit as the maximum amount shipped from the Mount Vernon Terminal via the pipeline during any consecutive 12-month period.

The permittee requested the flexibility to store gasoline or documented lower vapor pressure products in Tanks #1 – #5 [EP01, EP02, EP03, EP04, and EP05] in the permit renewal. This was incorporated as permit condition 006, along with recordkeeping requirements to document compliance.
10 CSR 10-6.170, Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin
While this subpart applies, none of the emission points at this installation are expected to produce visible air contaminants during normal operation. Monitoring and recordkeeping requirements for this rule have been removed from the permit as they have been deemed unnecessary.

10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants
All of the emission units with the exception of the Vapor Disposal Unit (VDU) associated with EP07 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 EP07, 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. This rule has been applied, however, since visible emissions will be unlikely from this source, no monitoring and recordkeeping requirements have been incorporated into Permit Condition 007.

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 EP07, 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 BBBBB, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution BBBBBB Terminals, Bulk Plants, and Pipeline Facilities.

Permit condition 001 contains the Compliance Assurance Monitoring Plan for the CEMS.

Greenhouse Gas Emissions
Note that this source may be subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO₂ emissions were not included within this permit. If applicable, the applicant is required to report the data directly to EPA. If applicable, the public may obtain CO₂ emissions data for this installation by visiting http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html.

Other Regulatory Determinations

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) Additive Tanks [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) FUG [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) EP11 [Tank #11], and EP13 [Tank #13]: These tanks store 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 these units.

4) 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 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 APCP'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 APCP a schedule for achieving compliance for that regulation(s).
Response to Public Comments

Public comments were received from Leslye E. Werner from EPA Region VII on August 8, 2018 while the permit draft was up on public notice. The comments are addressed in the order in which they appear within the letter.

Comment #1:
The listing of Emission Units with Limitations in Section I indicates EP01 (Tank #1); EP02 (Tank #2); and EP05 (Tank #5) are all Internal Floating Roof storage tanks and EP03 (Tank #3) and EP04 (Tank #4) are both Vertical Domed External Floating Roof tanks. However, the Application for Authority to Operate, submitted by TransMontaigne Operating Company-Mount Vernon Terminal dated November 13, 2014, indicates that Tank #1, Tank #2, Tank #3, Tank #4-and Tank #5 are all Internal Floating Roof tanks. Additionally, the discussion presented in the Maximum Achievable Control Technology (MACT) Applicability section within the Statement of Basis, under both 40 CFR Part 63, Subpart R and 40 CFR Part 63, Subpart BBB BBBB, show Tank #3 (EP03) and Tank #4 (EP04) as Domed External Floating Roof Tanks. Yet, the discussion of the control options 2)e) and 2)g), on page SB-15, state "(T)here are currently no tanks meeting the definition of an external floating roof at the installation." EPA suggests MoDNR consider including an explanation as to why the operating permit list of emission units is different from the information provided by the permittee in their operating permit application and consider modifying the Statement of Basis to match the facility emission units currently in existence.

Response #1:
EP01 (Tank #1), EP02 (Tank #2), and EP05 (Tank #5) are internal floating roof storage tanks. EP03 (Tank #3) and EP04 (Tank #4) are domed external floating roof storage tanks. 40 CFR Part 63, Subpart BBB BBBB incorporates by reference 40 CFR Part 63, Subpart WW's definition of an external floating roof which defines it as 'a floating roof located in a storage vessel without a fixed roof.' 40 CFR Part 60, Subpart Kb also describes external floating roof tanks as having no fixed roof. AP-42 Chapter 7.1 and Section 7.1.1.4 considers domed external floating roof storage tanks to be similar to internal floating roof storage tanks; domed external floating roof storage tanks contain a fixed roof at the top of the shell like internal floating roof tanks. Due to having a fixed roof, the domed tanks at this installation may not meet some definitions of an external floating roof tank and may instead be viewed by some to be more like an internal floating roof tank.

Comment #2:
10 CSR 10-6.065(6)(C)1 requires every operating permit issued pursuant to section (6) contain all applicable requirements at the time of operating permit issuance and shall specify emission limitations or standards applicable to the installation including those operational requirements or limitations as necessary to assure compliance. Permit Condition 002 incorporates applicable requirements for EP07, the 2 Bay Submerged Truck Loading Rack, equipped with a vapor destruction unit (enclosed flare). There are several "if/ then" requirements included in this draft permit condition. With this loading rack being installed twenty (20) plus years ago, the permittee has likely selected their compliance approach and the requirements of that approach are to be incorporated into the operating permit conditions. If later, the permittee opts for an approved alternate approach, the permittee needs to request a permit to construct followed by an operating permit modification. For instance, Permit Condition 002 includes requirements for the permittee using a thermal oxidizer, when it is clearly stated the permittee is using an enclosed flare, therefore, thermal oxidizer requirements may not apply. Also, performance testing
requirements relate to testing required in 2008 and here again, may not be applicable. Additionally, the Record keeping Requirements section of Permit Condition 002 has several of the "if/then" statements and EPA encourages MoDNR consider removal of what may be the non-applicable requirements within Permit Condition 002.

Response #2:
Non-applicable conditions have been removed from Permit Condition 002.

Comment #3:
It is MoDNR customary practice to include a discussion regarding the air pollutants that are major and thus create the need for the permittee to obtain a Part 70 Permit to Operate. However, neither the brief Installation Description on the draft Part 70 operating permit cover page nor the Installation Description in the Statement of Basis relate why the Mount Vernon Terminal needs this Part 70 permit. Additionally, the Installation Description lacks several pertinent items of facility information, such as: the mode of delivery of the petroleum products to the Mount Vernon Terminal; and the control measures the Mount Vernon Terminal employs to meet their applicable requirements. EPA suggests MoDNR consider providing additional Installation Description information to improve permit reviewers understanding of the facility.

Response #3:
The Statement of Basis has been updated with the requested information.

Comment #4:
Permit Condition 003 incorporates applicable New Source Performance Standards (NSPS) and Maximum Achievable Control Technology (MACT) standards related to EP01 and EP05; two (2) storage tanks equipped with internal floating roofs. Internal floating roof is the emission control strategy Mount Vernon Terminal has selected, therefore, all of the requirements in Permit Condition 003 regarding Closed Vent System and Control Device are likely not applicable. If later, the permittee opts for an approved alternate emission control strategy, the permittee needs to request a permit to construct followed by an operating permit modification.

Response #4:
All language referring to closed vent systems and control devices have been removed from Permit Condition 003. Permit Condition 003 has also been updated removing unused closure devices.

Comment #5:
Permit Condition 004 incorporates applicable requirements from 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 pertaining to internal floating roof tank (EP02; domed external floating roof tank (EP03) and domed floating roof tank (EP04). The Emission/Operational Limitations, as written in the draft Part 70 permit, lead one to believe that Mount Vernon Terminal has yet to decide on the emission control methodology. However, EPA believes, based on the age of the tanks and the compliance date established in 40 CFR part 63, Subpart BBBBBB, Mount Vernon Terminal has already selected and implemented their emission control strategy and MoDNR might want to write the Emission / Operational Limitations to reflect actual terminal conditions.
Response #5:
All language referring to alternative compliance methods that were not chosen by the permittee have been removed from Permit Condition 004.

Comment #6:
10 CSR 10-6.075 indicates MoDNR relies on EPA to be the primary regulating agency for area sources of hazardous air pollutants (HAPs). 40 CFR part 63, Subpart BBBBBB is one of these HAP area sources for which MoDNR relies on EPA to be the regulating agency. Therefore, the reporting requirements in Permit Condition 002, Permit Condition 003, Permit Condition 004 and Permit Condition 006 should reflect the Missouri Air Compliance Coordinator at EPA Region 7 as the primary recipient of compliance reports with MoDNR receiving copies as required.

Response #6:
The permit has been updated to add EPA Region 7 as recipient to the reporting requirements of 40 CFR Part 63, Subpart BBBBBB.

Comment #7:
The Emission/Operational Limitation, in Permit Condition 007, says the permittee may store gasoline or documented lower vapor pressure products in Tanks #1 - #5 (EP01, EP02, EP03, EP04 and EP05). As written, this Emission/Operational Limitation is too vague as to be enforceable from a practical matter. EPA suggests MoDNR consider including the upper limit of available vapor pressure for the products to be stored in Tanks #1-5.

Response #7:
Permit Condition 006 (formerly Permit Condition 007) has been updated to limit it to less than RVP 14.3, based on the worst case scenario used in the potential to emit calculations.

Comment #8:
The Operational Limitation, in Permit Condition 008 (formerly Permit Condition 009), says the permittee shall limit throughput of ethanol through both tanks to 8,000,000 gallons during any consecutive 12-month period. However, the requirement does not specify how frequently the permittee is to determine total ethanol throughput. EPA suggest MoDNR consider including a frequency for Mount Vernon Terminal to determine their operational compliance.

Response #8:
The wording has been modified that the permittee must keep both monthly and consecutive 12-month totals.
OCT 02 2018

Mr. Lorne Allcock
Mount Vernon Terminal
15376 Highway 96
Mt. Vernon, MO 65712

Re: Mount Vernon Terminal, 109-0002
Permit Number: OP2018-084

Dear Mr. Allcock:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at http://dnr.mo.gov/regions/. The online CAV request can be found at http://dnr.mo.gov/cav/compliance.htm.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS:kwj

Enclosures

PAMS File: 2014-11-045