

STATE OF MISSOURI  
**DEPARTMENT OF NATURAL RESOURCES**

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Matt Blunt, Governor • Doyle Childers, Director

www.dnr.mo.gov

JAN 12 2007

Mr. Rick Olson, VP  
Pipeline Operations and Technical Services  
Magellan Pipeline Company, L.P. - Columbia  
P.O. Box 22186, MD 28  
Tulsa, OK 74121

Re: Magellan Pipeline Company, L.P. - Columbia, 019-0005  
Permit Number: **OP2007-001**

Dear Mr. Olson:

Enclosed with this letter is your intermediate 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 you read and understand the requirements contained in your permit.

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:jdk

Enclosures

c: Ms. Tamara Freeman, US EPA Region VII  
Northeast Regional Office  
PAMS File: 2002-06-069



**Missouri Department of Natural Resources**  
**Air Pollution Control Program**

# **INTERMEDIATE STATE PERMIT TO OPERATE**

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

**Intermediate Operating Permit Number:** OP2007-001  
**Expiration Date:** JAN 1 1 2012  
**Installation ID:** 019-0005  
**Project Number:** 2002-06-069

**Installation Name and Address**

Magellan Pipeline Company, L.P. - Columbia  
R.R. 1 Hwy 63 South  
Columbia, MO 65201  
Boone County

**Parent Company's Name and Address**

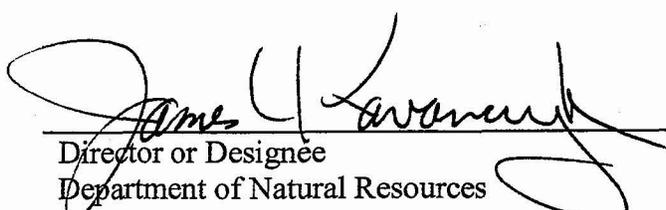
Magellan Pipeline Company, L.P.  
P.O. Box 22186, MD 27-3  
Tulsa, OK 74121-1899

**Installation Description:**

Magellan Pipeline Company, L.P. - Columbia is a petroleum product storage and loading facility located in Boone County. The facility receives petroleum products through underground pipelines, stores the petroleum products in aboveground storage tanks, and then loads tanker trucks with the petroleum products utilizing a 3-spot loading rack.

JAN 1 2 2007

Effective Date

  
Director or Designee  
Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Magellan Pipeline Company, L.P. - Columbia is a petroleum product storage and loading facility located in Boone County. The facility receives petroleum products through underground pipelines, stores the petroleum products in aboveground storage tanks, and then loads tanker trucks with the petroleum products utilizing a 3-spot loading rack.

Year	Reported Air Pollutant Emissions, tons per year						Hazardous Air Pollutants (HAPs)
	Particulate Matter $\leq$ Ten Microns (PM-10)	Sulfur Oxides (SO <sub>x</sub> )	Nitrogen Oxides (NO <sub>x</sub> )	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	
2005	--	--	3.20	25.80	8.00	--	--
2004	--	--	2.95	23.52	7.37	--	--
2003	--	--	2.99	25.44	7.47	--	--
2002	--	--	3.06	21.84	7.66	--	--
2001	--	--	2.90	45.36	7.26	--	--

### EMISSION UNITS WITH LIMITATIONS

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

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EU0010	Loading Rack
EU0020	Product Storage Tank #843
EU0030	Product Storage Tank #1444
EU0040	WPL Additive Tank
EU0050	Texaco Additive Tank
EU0060	10,000 Barrel Ethanol Storage Tank

### EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

<u>Description of Emission Source</u>
Product Storage Tank #191
Product Storage Tank #192
Product Storage Tank #785
Product Storage Tank #786
Product Storage Tank #787
Product Storage Tank #1421
Product Storage Tank #6028
Facility-Wide Fugitive Emissions

**DOCUMENTS INCORPORATED BY REFERENCE**

These documents have been incorporated by reference into this permit.

- 1) Missouri Department of Natural Resources Construction Permit #0792-019
- 2) Missouri Department of Natural Resources Construction Permit #0595-003
- 3) Missouri Department of Natural Resources Construction Permit #0595-006
- 4) Missouri Department of Natural Resources Construction Permit #0695-020
- 5) Missouri Department of Natural Resources Construction Permit #0596-030

## **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.

None.

### III. Emission Unit Specific Emission Limitations

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

EU0010 – Loading Rack			
Emission Unit	Description	Manufacturer/Model #	2001 EIO Reference #
EU0010	Three-spot loading rack; MHDR 72,000 gallon/hr; equipped with vapor combustor with 92% VOC/HAP control efficiency and 98.7% VOC/HAP capture efficiency; installed 1995	John Zink	EP-01

#### PERMIT CONDITION EU0010-001

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 Limitation:

- 1) The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded. [§60.502(b)]

#### Equipment Specifications/Operational Limitations:

- 1) The permittee shall comply with the equipment specifications as specified below: [§60.502]
  - a) The permittee shall equip each loading rack that loads gasoline tank trucks at the bulk gasoline terminal with a vapor collection system designed to collect total organic compounds vapors displaced from tank trucks during product loading. [§60.502(a)]
  - b) Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack. [§63.502(d)]
  - c) The permittee shall act to assure that loadings of gasoline tank trucks at the loading racks are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system. [§60.502(f)]
  - d) The permittee shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the facility. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks. [§60.502 (g)]
  - e) The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4.5 kPa (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)]
  - f) No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4.5 kPa (450 mm of water). [§60.502(i)]
- 2) Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the procedures specified below: [§60.502(e)]
  - a) The permittee shall obtain the vapor tightness documentation described in §60.505(b) for each gasoline tank truck to be loaded at the affected facility. [§60.502(e)(1)]

- b) The permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility. [§60.502(e)(2)]
- c) The permittee shall cross-check each tank identification number obtained with the file of tank vapor tightness documentation within two weeks after the corresponding tank is loaded unless either of the following conditions is maintained: [§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 crosscheck shall be performed semiannually. [§60.502(e)(3)(i)(B)]
  - iii) If either the quarterly or semiannual cross-check provided in §60.502(e)(3)(i)(A) through (B) reveals that these conditions were not maintained, the facility shall return to biweekly monitoring until such time as these conditions are again met. [§60.502(e)(3)(ii)]
- d) The permittee shall take steps assuring that the non-vapor-tight gasoline tank truck will not be reloaded at the facility until vapor tightness documentation for that tank is obtained. [§60.502(e)(5)]
- e) The permittee may use alternate procedures to those described in §60.502(e)(1) through (5) for limiting gasoline tank truck loadings upon application to, and approval by, the director. [§60.502(e)(6)]

**Monitoring:**

- 1) The permittee shall conduct a monthly inspection of the vapor collection system, the vapor processing system, and loading rack during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this inspection, detection methods incorporating sight, sound, or smell are acceptable. [§60.502(j)]
- 2) The permittee shall use a Flame Eye to continuously monitor the vapor collection system for the presence of a flame. If no flame is detected, the vapor collection system will be shutdown.

**Recordkeeping:**

- 1) The permittee shall keep the tank truck vapor tightness documentation required under §60.502(e)(1) on file at the terminal in a permanent form available for inspection. [§60.505(a)]
- 2) The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27 in appendix A, 40 CFR Part 60. This documentation shall include, as a minimum, the following information: [§60.505(b)]
  - a) Test title: Gasoline Delivery Tank Pressure Test--EPA Reference Method 27; [§60.505(b)(1)]
  - b) Tank owner and address; [§60.505(b)(2)]
  - c) Tank identification number; [§60.505(b)(3)]
  - d) Testing location; [§60.505(b)(4)]
  - e) Date of test; [§60.505(b)(5)]
  - f) Tester name and signature; [§60.505(b)(6)]
  - g) Witnessing inspector, if any: name, signature, and affiliation; [§60.505(b)(7)]
  - h) Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs). [§60.505(b)(8)]
- 3) The permittee shall maintain records of each monthly leak inspection of the vapor collection system, the vapor processing system, and loading rack required under §60.502(j) on file at the terminal for at least 5 years. Inspection records shall include, as a minimum, the following information: (see Attachment A) [§60.502(j)] and §60.505(c)]

- a) Date of inspection; [§60.505(c)(1)]
- b) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak); [§60.505(c)(2)]
- c) Leak determination method; [§60.505(c)(3)]
- d) Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days); [§60.505(c)(4)]
- e) Inspector name and signature. [§60.505(c)(5)]
- 4) The permittee shall keep records of all notifications to the owner or operator of each non-vapor-tight gasoline tank truck loaded required by §60.502(e)(4) on file at the terminal for at least 5 years. [§60.505(d)]
- 5) The permittee shall keep records of all replacements or additions of an existing vapor processing system for at least 5 years. [§60.505(f)]

**Reporting:**

- 1) The permittee shall submit to the director a written report of the results of each performance test on the vapor processing system required by §60.503(a). [§60.503(a) and §60.8]
- 2) The permittee shall notify the owner or operator of each non-vapor-tight gasoline tank truck loaded at the facility within one week of the documentation crosscheck in §60.502(e)(3). [§60.502(e)(4)]
- 3) The permittee shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could cause an exceedance of this regulation.
- 4) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification, as required by Section IV of this permit.

**PERMIT CONDITION EU0010-002**

10 CSR 10-6.065, Operating Permits  
Voluntary Limitations

**Emission Limitation:**

- 1) The permittee shall be limited to no more than 7,000,000 barrels throughput of gasoline and 7,000,000 barrels throughput of distillate per any consecutive 12-month period.

**Monitoring:**

- 1) The permittee shall monitor the monthly throughput of gasoline and distillate.

**Recordkeeping:**

- 1) The permittee shall record the monthly throughput of gasoline and distillate and the sum of the most recent 12-month throughputs. Attachment G, or a similar form created by the permittee, shall be used to demonstrate compliance with this requirement.
- 2) All records shall be kept on-site for a minimum of five years and made available to the Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the installation exceeded the limitations listed above.

Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification, as required by Section IV of this permit.

EU0020 - Product Storage Tank # 843			
Emission Unit	Description	Manufacturer/Model #	2001 EIQ Reference #
EU0020	Internal floating roof storage tank; stores liquid petroleum product with a true vapor pressure less than 11.1 psia; capacity: 3,136,938 gallons; installed 1974	Unknown	EP-07

**PERMIT CONDITION EU0020-001**  
10 CSR 10-6.070, New Source Performance Regulations  
40 CFR Part 60, Subpart A General Provisions and Subpart K Standards of Performance for Storage Vessels for Petroleum Liquids after June 11, 1973 and prior to May 19, 1978

**Emission Limitations:**

The permittee shall store in EU0020 (Tank #843) only liquid petroleum products with a true vapor pressure of less than 11.1 psia.

**Monitoring/ Recordkeeping:**

- 1) The permittee shall maintain a record of the petroleum liquid stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective storage period. (see Attachment F) [§63.113(a)]
- 2) This record shall be made available to the Missouri Department of Natural Resources' personnel upon request.
- 3) All records shall be maintained for 5 years.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

EU0030 - Product Storage Tank #1444			
Emission Unit	Description	Manufacturer/Model #	2001 EIQ Reference #
EU0030	Vertical fixed roof tank; stores liquid petroleum product with a true vapor pressure less than 1.5 psia; capacity: 2,119,740 gallons; installed 1984	Unknown	EP-09

**PERMIT CONDITION EU0030-001**  
10 CSR 10-6.070, New Source Performance Regulations  
40 CFR Part 60, Subpart A General Provisions and Subpart Ka Standard of Performance for Storage Vessels for Petroleum Liquids after May 18, 1978

**Emission Limitation:**

The permittee shall store in EU0030 (Tank #1444) only liquid petroleum products with a true vapor pressure of less than 1.5 psia.

**Monitoring/Recordkeeping:**

- 1) The permittee shall maintain a record of the petroleum liquid stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective storage period. (see Attachment F) [§60.115a(a)]
- 2) This record shall be made available to the Missouri Department of Natural Resources' personnel upon request.
- 3) All records shall be maintained for 5 years.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

EU0040 - WPL Additive Tank EU0050 - Texaco Additive Tank			
Emission Unit	Description	Manufacturer/Model #	2001 EQ Reference #
EU0040	Bulk additive tank; fixed roof; capacity: 6,000 gallon; installed 1992	NA	NA
EU0050	Bulk additive tank; fixed roof; capacity: 4,000 gallon; installed 1992	NA	NA

**PERMIT CONDITION (EU0040 and EU0050)-001**  
10 CSR 10-6.060, Construction Permits Required  
Construction Permit #0792-019, Issued July 13, 1992

**Operating Conditions/Recordkeeping:**

The permittee shall keep readily accessible records for EU0040 (WPL Additive Tank) and EU0050 (Texaco Additive Tank) showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for the life of the source.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

EU0060 – Ethanol Storage Tank			
Emission Unit	Description	Manufacturer/Model #	2001 EIO Reference #
EU0060	10,000 Barrel Ethanol Storage Tank Internal Floating Roof Tank	NA	NA

**PERMIT CONDITION (EU0060) – 001**  
10 CSR 10-6.070 New Source Performance Regulations  
40 CFR Part 60, Subpart Kb Standards of Performance for Volatile Organic Storage Vessels  
(Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or  
Modification Commenced After July 23, 1984

**Monitoring:**

- 1) The owner or operator shall keep copies of all records required by this section, except for the record required by paragraph (b) of this section, for at least 2 years. The record required by paragraph (b) of this section will be kept for the life of the source.
- 2) The owner or operator of each storage vessel as specified in §60.110(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.
- 3) Except as provided in paragraphs (f) and (g) of this section, the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa or with a design capacity greater than or equal to 75 m<sup>3</sup> but less than 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure greater than or equal to 15.0 kPa shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.
- 4) Except as provided in paragraph (g) of this section, the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure that is normally less than 5.2 kPa or with a design capacity greater than or equal to 75 m<sup>3</sup> but less than 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure that is normally less than 27.6 kPa shall notify the Administrator within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each range.
- 5) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below.
  - a) For vessels operated above or below ambient air temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.
    - i) For other liquids, the vapor pressure:
      - A) May be obtained from standard reference texts, or
      - B) Determined by ASTM D2879-83, 96, or 97 (incorporated by reference –see §60.17); or
      - C) Measured by an appropriate method approved by the Administrator; or
      - D) Calculated by an appropriate method approved by the Administrator.

## IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), 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.

### **10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions**

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

**10 CSR 10-6.060 Construction Permits Required**

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

**10 CSR 10-6.065 Operating Permits**

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) 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.
- 3) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

**10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential**

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

**10 CSR 10-6.150 Circumvention**

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

**10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin**

- 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 10-3.030 Open Burning Restrictions**

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
  - a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
  - b) The schedule of burning operations;
  - c) The exact location where open burning will be used to dispose of the trade wastes;
  - d) Reasons why no method other than open burning is feasible; and
  - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt Magellan Pipeline Company, L.P. - Columbia from the provisions of any other law, ordinance or regulation.
- 5) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

**10 CSR 10-3.090 Restriction of Emission of Odors**

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

**This requirement is not federally enforceable.**

**10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61  
Subpart M National Emission Standard for Asbestos**

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

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

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

**Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone**

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
  - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.

- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d) Persons disposing of small appliances, MVACs, and MYAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
  - 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

#### **10 CSR 10-6.280 Compliance Monitoring Usage**

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - a) Applicable monitoring or testing methods, cited in:
    - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
    - ii) 10 CSR 10-6.040, "Reference Methods";
    - iii) 10 CSR 10-6.070, "New Source Performance Standards";
    - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or

- b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

## V. General Permit Requirements

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

### 10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

### 10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Recordkeeping and Reporting Requirements

#### 1) Recordkeeping

- 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, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
- b) The permittee shall submit a report of all required monitoring by:
  - i) April 1st for monitoring which covers the January through December time period.
  - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
- c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit.
- d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
  - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 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 annual report shall be reported on the schedule specified in this permit, and no

later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

**10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)**

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

**10 CSR 10-6.065(5)(C)1.A 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 under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

**10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios**

None

**10 CSR 10-6.065, §(5)(C)1, §(5)(C)3, §(6)(C)3.B, and §(6)(C)3.E.(I) – (III) and (V) – (VI)  
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 the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances 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, §(5)(C)1 and §(6)(C)7 Emergency Provisions**

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
  - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
  - b) That the installation was being operated properly,

- c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
  - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

#### **10 CSR 10-6.065(5)(C)5 Off-Permit Changes**

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. 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 a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
  - b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. 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; and
  - 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.

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

The application utilized in the preparation of this permit was signed by Rick Olson, VP Pipeline Operations and Technical Services. 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 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause**

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) 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,
- 2) 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,
- 3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

**10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis**

This permit is accompanied by a statement setting forth the legal and factual basis for the draft permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

## **VI. ATTACHMENTS**

Attachments follow.









**ATTACHMENT E**  
**Method 9 Opacity Emissions Observations**

This recordkeeping sheet or an equivalent form may be used for the recordkeeping requirements of 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*.

Method 9 Opacity Emissions Observations							
Company				Observer			
Location				Observer Certification Date			
Date				Emission Unit			
Time				Control Device			

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

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

Readings ranged from \_\_\_\_\_ to \_\_\_\_\_ % opacity.

Was the emission unit in compliance at the time of evaluation? \_\_\_\_\_

Signature of Observer \_\_\_\_\_

YES

NO





## STATEMENT OF BASIS

### Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance; since it can take that long or longer to obtain a part 70 operating permit.

### 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) Intermediate Operating Permit Application, received 06/14/02; revised 7/23/02; revised 8/14/03;
- 2) 2001 Emissions Inventory Questionnaire, received 3/29/02;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) MDNR letter from Steve Feeler RE: New Source Performance Standard applicability determination Magellan Pipeline Company - Columbia, Mo Tank 786, dated 8/11/2005;
- 5) Strapping chart for Tank 1444 provided by Terri Hollomon of Magellan Pipeline Company.

### Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

#### 10 CSR 10-6.220, *Restriction of Emissions of Visible Air Contaminants*

This rule is applicable to EU0010 and is included in the operating permit.

### Other Air Regulations Determined Not to Apply to the Operating Permit

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

#### 10 CSR 10-6.100, *Alternate Emission Limits*

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

### Construction Permit Revisions

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

- 1) APCP Construction Permit #0792-019
  - a) This construction permit was amended by construction permit #0595-006 in response to the Notice of Violation (NOV #1199). The amendment removed the throughput limit for tank #1444 required by Special Condition #1. Consequently, the recordkeeping and reporting requirements

associated with the throughput limit for tank #1444 and required by Special Condition #3 are not included in the operating permit.

- b) Special Conditions #2 required that the facility maintain readily accessible records for EU0030 (Tank #1444), EU0040 (WPL Additive Tank), and EU0050 (Texaco Additive Tank) showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for the life of the source. These recordkeeping requirements are listed in Permit Condition EU0030-002 and Permit Condition (EU0040 and EU0050)-001.
- 2) APCP Construction Permit #0595-003
- a) This construction permit listed 10 CSR 10-5.160, Control of Odors in the Ambient Air, as an applicable requirement. However, this rule is specific to the St. Louis Metropolitan Area and is not applicable to the facility. 10 CSR 10-3.090, Restriction of Emission of Odors, is the appropriate rule and is included in Section IV, Core Permit Requirements, of the operating permit.
  - b) This permit listed an emission limit of 35 milligrams of total organic compounds per liter of gasoline loaded.

**New Source Performance Standards Applicability**

40 CFR Part 60, Subpart K, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978*

- 1) Subpart K applies to EU0020 (Tank #843) because this tank was installed in 1974, stores a petroleum liquid, and has a capacity greater than 40,000 gallons.
- 2) Subpart K does not apply to the following storage tanks because these tanks were installed prior to June 11, 1973.

Note: A letter from Steve Feeler, MDNR Compliance/Enforcement Section Chief, dated 8/11/2005, documents that the installation of a floating roof on Tank #786 in 1975 is not by itself considered a modification or reconstruction. Therefore, Tank #786 is not subject to Subpart K.

Emission Unit # (2001 EIQ)	Tank #	Installation Date
EP-02	191	1964
EP-03	192	1964
EP-04	785	1964
EP-05	786	1964
EP-06	787	1964
EP-08	1421	1964
EP-010	6028	1972

40 CFR Part 60, Subpart Ka, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984*

Subpart Ka applies to the EU0030 (Tank #1444) because the tank has a storage capacity greater than 40,000 gallons, was installed between May 18, 1978 and July 23, 1984, and stores a volatile organic liquid.

Note: The initial intermediate state permit application, received by APCP on May 14, 1997, stated that 40 CFR Part 60, Subpart Kb was applicable to Tank #1444. On 7/15/03, Terri Hollomon of Magellan Pipeline Company submitted a strapping chart for Tank #1444 that indicated the tank was constructed prior to April 11, 1984.

40 CFR Part 60, Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*

Subpart Kb applies to storage vessels installed after July 23, 1984 that store a volatile organic liquid (VOL), and that have a capacity greater than or equal to 75 cubic meters (m<sup>3</sup>). During the life of this permit, an ethanol tank larger than 75 m<sup>3</sup> will be installed. The tank will be subject to this regulation. Based on conversation, this tank will not require a construction permit.

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

This standard applies to this installation because the installation includes a loading rack that delivers liquid product into gasoline tank trucks and this loading rack was installed in 1995, after the December 17, 1980 applicability date of Subpart XX.

#### **Maximum Available Control Technology Applicability**

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

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

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

40 CFR Part 63, Subpart WW, National Emission Standards for Storage Vessels--Control Level 2

These subparts do not apply to the installation because these subparts only apply to those owners and operators of facilities subject to other subparts, which reference the use of these subparts for air emission control.

#### **National Emission Standards for Hazardous Air Pollutants Applicability**

40 CFR Part 61, Subpart M, *National Emission Standard for Asbestos*

This rule applies to the installation because of the renovation and demolition parts of the subpart, which make the subpart applicable to all sources. It is included as a core permit requirement.

40 CFR Part 61, Subpart V, *National Emission Standard for Equipment Leaks (Fugitive Emission Sources)*

This rule does not apply because the equipment at the source is not in volatile hazardous air pollutant service as defined in §61.241

#### **Voluntary Operating Permit Limitations**

None.

#### **Other Regulatory Determinations**

Intermediate Permit Status

The facility has the potential to exceed the major source thresholds for VOCs. The installation has accepted voluntary federal enforceable regulations to qualify for the Intermediate Operating Permit as demonstrated below.

#### Loading Rack VOC Emissions

$$L_L = \frac{12.46 * M * W * P}{T}$$

$$7,000,000 \text{ barrel/yr} = 294,000,000 \text{ gal/yr}$$

$$L_L = \frac{12.46 * 66 * 0.6 * 4.7894}{514.12}$$

$$L_L = \frac{4.59 \text{ lb}}{10^3 \text{ gal}}$$

$$\frac{4.596527 \text{ lb} * 294,000,000 \text{ gal} * 1 \text{ ton}}{1,000 \text{ gal} * 1 \text{ yr} * 2,000 \text{ lb}} = 675.6995 \text{ ton/yr uncontrolled}$$

$$\text{Fugitive Emissions} = 1.3\% (675.6995 \text{ ton/yr}) = 8.784 \text{ ton/yr}$$

$$\text{Stack Emissions} = (675.6995 - 8.784 \text{ ton/yr}) * (1 - 0.95) = 33.346 \text{ ton/yr}$$

$$\text{Total process Emissions} = 8.784 + 33.346 = 42.13 \text{ ton/yr}$$

$$42.13 \text{ ton/yr} * (1/294,000,000 \text{ yr/gal}) * (1/3.7854 \text{ gal/L}) * 2,000 \text{ lb/ton} * 453,593 \text{ mg/lb} = 34.34 \text{ mg/L}$$

**34.34 mg/L is in Compliance.**

This permit condition includes two tank turnovers per week per tank to allow for rack and pipeline throughput, which is very conservative.

#### Uncontrolled Loading of Distillates

The regulations that apply to the VCU specify that the unit must be used during the loading of gasoline. This installation also loads distillates, however, controls are not required for distillate loading by any applicable regulation. Therefore, this installation may load distillate without using the VCU. The uncontrolled potential emissions from distillate loading are listed above.

Additive tanks EU0040 and EU0050 were permitted for Jet Naphtha. This product was much more volatile than any of the current additives and the additives that will be used in the future. Therefore, Magellan is allowed flexibility in changing additives as long as the additive is not more volatile than Jet Naphtha.

#### Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.
- 4) The installation does not contain the type of emission unit which is regulated by that rule.
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Prepared by:

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