

STATE OF MISSOURI

PERMIT BOOK



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: 012007 - 020 Project Number: 2006-09-048

Parent Company: Martinsburg Farmers Elevator Company

Parent Company Address: P.O. Box 130, Martinsburg, MO 65264

Installation Name: Martinsburg Farmers Elevator Company Bulk Fuel

Installation Address: 15751 Highway 19, Martinsburg, MO 65264

Location Information: Audrain County, S14, T50N, 6W

Application for Authority to Construct was made for:

Installation of a bulk fuel storage and dispensing plant. Three (3) 12,000 gallon above ground unleaded gasoline and three (3) 12,000 gallon above ground diesel storage tanks and a 90 gallon per minute 3 spout loading rack. These air contaminant sources were constructed prior to receipt of a permit from the Missouri Department of Natural Resources. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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

Standard Conditions (on reverse) and Special Conditions are applicable to this permit.
JAN 30 2007

EFFECTIVE DATE

A handwritten signature in black ink, appearing to read "James Kuonert".
DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

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

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

You must notify the department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located with 15 days after the actual start up of this (these) air contaminant source(s).

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

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

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

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

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Project No.	2006-09-048

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

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

Martinsburg Farmers Elevator Company Bulk Fuel
Audrain County, S14, T50N, 6W

1. Gasoline Received Limitation
 - A. Martinsburg Farmers Elevator Company Bulk Fuel shall limit throughput to no more than 19,000 gallons of unleaded fuel in any 24 hour day. This limitation is to avoid applicability of Title 40 Protection of the Environment, Part 60 Standards of Performance for New Stationary Sources Subpart XX – Standards of Performance for Bulk Gasoline Terminals.
 - B. Martinsburg Farmers Elevator Company Bulk Fuel shall record the amount of gasoline received in gallons each 24-hour day. Attachment A or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 1.A.. Martinsburg Farmers Elevator Company Bulk Fuel shall maintain all records required by this permit for not less than five (5) years and shall make them immediately available to any Department of Natural Resources' personnel upon request.
 - C. Martinsburg Farmers Elevator Company Bulk Fuel shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 1.A indicate that the source exceeds the limitation of Special Conditions Number 1.A.

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

Project Number: 2006-09-048
Installation ID Number: 007-0059
Permit Number:

Martinsburg Farmers Elevator Company Bulk Fuel Complete: September 18, 2006
15751 Highway 19, Martinsburg, MO 65264 Reviewed: December 15, 2006

Parent Company:
Martinsburg Farmers Elevator Company
P.O. Box 130, Martinsburg, MO 65264

Audrain County, S14, T50N, 6W

REVIEW SUMMARY

- Martinsburg Farmers Elevator Company Bulk Fuel has applied for authority to construct six storage tanks each of 12,000 gallons to store unleaded gasoline and #2 diesel fuel and a three spout load rack with a capacity of 90 gallons per minute. A soy diesel tank exists at the site. No emissions are expected from the 100% soybean oil.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are hexane, n-hexane, benzene, toluene, ethylbenzene, xylene, and cumene.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment. The installation has taken a throughput limit of 19,000 gallons per 24-hour day to remove applicability of Title 40 Protection of the Environment, Part 60 Standards of Performance for New Stationary Sources Subpart XX – Standards of Performance for Bulk Gasoline Terminals.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment. Maximum Achievable Control Technology (MACT) Subpart R, National Emission Standards for Hazardous Air Pollutants for Source Categories, regulations do not apply to this installation in accordance with 40 CFR 63.420(a) (2).
- No air pollution control equipment is being used in association with the new equipment.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. The installation has taken a throughput limit of 19,000 gallons per 24-hour day.

- This installation is located in Audrain County, an attainment area for all criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- Ambient air quality modeling was not performed for this review since the installation chose a throughput limit of 19,000 gallons per 24 hour day.
- Emissions testing is not required for the equipment.
- No Operating Permit is required for this installation.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Martinsburg Farmers Elevator Company –Bulk Fuel is located at 15751 Highway 19 in Martinsburg, Missouri, 65264. The installation has been in operation since early 1990 without a construction permit. The loading rack may have been constructed before the 1980's but was modified before installation at this site in the early 90's. The site is engaged in dispensing primarily unleaded gasoline and diesel fuel from above ground storage tanks. This plant handles relatively small amounts of fuel. This is a de minimus source because the site chose to take a throughput limit of 19,000 gallons per 24 hour day of gasoline received. No operating permit has been issued for the facility and none is required.

Martinsburg Farmers Elevator Company –Bulk Fuel has 6 tanks each at 12,000 gallon capacity. A smaller tank that stores 100 percent soy oil (soy diesel) is on site and is expected to have no emissions. The loading rack has three (3) spouts which can operate simultaneously each with a capacity to load 90 gallons per minute. The tanks are bottom loaded. They are loaded by hose from the tanker truck. All fuel is delivered by truck the installation receives no product by pipeline. No permits have been issued to Martinsburg Farmers Elevator Company Bulk Fuel from the Air Pollution Control Program.

PROJECT DESCRIPTION

Martinsburg Farmers Elevator Company –Bulk Fuel will have five (5) emission points. The breathing and working losses from the storage of gasoline and the breathing and working losses from the storage of diesel fuel will account for four (4) of the emission sources. The loading rack is the other emission source. Table one defines the emission sources for this installation.

Table One: Emission Sources at 007-0059.

Emission Point	Description
EP-1A	Breathing Loss from gasoline storage
EP-1B	Working Loss from gasoline storage
EP-2A	Breathing Loss from diesel storage
EP-2B	Working Loss from diesel storage
EP-3	Loading rack emissions

Liquid gasoline has a HAP composition of 30% by weight. The specification of HAPs in the gasoline grade petroleum products was based upon data obtained in the report issued by the Radian Corporation July 21, 1989, AB2588 Emission Estimation Technique for Petroleum Refineries and Bulk Terminals. As per this report the annual average HAPs concentration in the gasoline grade product is 30 percent by weight. This data is consistent with actual HAPs concentration data obtained from Sinclair Oil Corporation refinery in Tulsa, Oklahoma.

The HAP/VOC ratio of 11 was used to determine HAPs emissions for the loading rack. 11% is the worst case based on EPA guidance.

Title 40, Protection of the Environment, Part 63 National Emission Standards for Hazardous Air Pollutants for Source Categories, Subpart R, National Emission Standards for Gasoline Distribution Facilities, did not apply. As determined from the information supplied by the company as the value of the emissions screening factor was less than one (1). The company supplied the following information that the value of "C" was 10. C is the number of valves, pumps, connectors, loading arm valves, and open ended lines in gasoline service. It appears that Title 40 Protection of the Environment, Part 60 Standards of Performance for New Stationary Sources Subpart XX – Standards of Performance for Bulk Gasoline Terminals would be applicable to the installation. However, the installation has taken a limit of 19,000 gallons of gasoline received to remove the applicability of Subpart XX. Tracking the gallons of gasoline received will show compliance with the HAP and VOC limits as 19,000 gallons is substantially below the de minimis levels for HAP and VOC.

EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 7.1, Organic Liquid Storage Tanks, 1997. Loading rack emission factor calculated using equation from AP-42, Section 5.2, Transportation and Marketing of Petroleum Liquids. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year.) The following table provides an emissions summary for this project.

Table Two: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions**	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	N/D*	N/D	N/A	N/A
SO _x	40.0	N/D	N/D	N/A	N/A
NO _x	40.0	N/D	N/D	N/A	N/A
VOC	40.0	N/D	N/D	4.34***	N/A
CO	100.0	N/D	N/D	N/A	N/A
HAPs	10.0/25.0	N/D	N/D	0.47***	N/A

N/D not Determined and N/A not applicable.

**No record of an EIQ submittal was found.

***Potential Emissions are based on a to a rate of 19,000 gallons of gasoline received per day. Potential emissions without the 19,000 gallon limitation are 10.92 tons per year HAPs and 90.38 tons per year VOCs.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOC and HAPs are below de minimis levels because of a throughput limit of 19,000 gallons per 24 hour on gasoline received.

APPLICABLE REQUIREMENTS

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

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-3.090

STAFF RECOMMENDATION

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

Timothy Paul Hines
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, received September 18, 2006, designating Martinsburg Farmers Elevator Company as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Northeast Regional Office Site Survey, dated September 27, 2006.

Attachment A – Gasoline Compliance Worksheet

Martinsburg Farmers Elevator Company Bulk Fuel
Audrain County, S14, T50N, 6W
Project Number: 2006-09-048
Installation ID Number: 007-0059
Permit Number: _____

This sheet covers the period from _____ to _____.
(month, year) (month, year)

Date	Gallons of Gasoline Received
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
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14	
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28	
29	
30	
31	

Compliance is indicated when the total gasoline received in any 24 hour day does not exceed 19,000 gallons.

Mr. Matt Bishop
General Manager
Martinsburg Farmers Elevator Company Bulk Fuel
15751 Highway 19
Martinsburg, MO 65264

RE: New Source Review Permit - Project Number: 2006-09-048

Dear Mr. Bishop:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions, your new source review permit application is necessary for continued compliance.

The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please contact me at (573) 751-4817, or write me at the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, Missouri 65102. Thank you for your time and cooperation.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH: thl

Enclosures

c: Northeast Regional Office
PAMS File 2006-09-048