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NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

NOV 12 2019

Mr. Brent Myers
EHS Manager
Kinder Morgan Terminals, LLC
2425 Wharf Street
St. Louis, MO 63104

RE: New Source Review Permit Amendment – Permit Number: 99-02-009SC-A
Project Number: 2019-07-030; Installation Number: 510-0180

Dear Mr. Myers:

Kinder Morgan Terminals, LLC operates a bulk liquid storage and transfer facility that currently consists of 17 above ground storage tanks and 5 product loadout stations. Product is received and loaded out via railcar, tank truck, and occasionally by barge. The storage tanks all contain inorganic materials, except for Tank 1 and Tank 5, which contain diethylene glycol and ethylene glycol, respectively.

Construction Permit No. 99-02-009SC was previously issued to Slay Bulk Terminals on July 11, 1999 by the City of St. Louis Department of Public Safety's Division of Air Pollution Control. Kinder Morgan Terminals, LLC has been operating the installation since its acquisition on March 8, 2011 and has been required to operate under the limitations and conditions of the existing permit.

On July 22, 2019, the Air Pollution Control Program received your request to terminate Construction Permit No. 99-02-009SC because the current equipment and operations at the installation are no longer represented by the original permit, and therefore, the limitations and conditions of the original permit are no longer applicable. The specific constraints of Construction Permit No. 99-02-009SC are provided below:

Section II: Limitations

- A. Bulk liquid throughput for EP1, EP2, and EP5 is limited to 50 million gallons in any consecutive twelve month period.
- B. Solid material hopper throughput is limited to 50,000 tons in any consecutive twelve month period.

- C. Facility emissions (loading and unloading) shall not exceed the following limits in any consecutive twelve-month period:

Pollutant	Allowable Emissions (ton/yr)
PM ₁₀	0.63
VOC	22.82
Total HAPs	9.13

- D. Emissions at the solid material hopper shall not exceed an opacity level of 20% for a period or periods aggregating more than six minutes in any consecutive sixty minute period.
- E. The rate of particulate emissions from the solid material hopper shall not exceed 46.90 pounds per hour during operation.

Section III: Conditions

- A. ~~The facility shall store and load only caustic soda in tanks EP2, EP3, and EP6. (Superseded in an amendment issued March 29, 2011)~~
- B. The facility shall store and load only solid materials through the solid materials storage hopper.
- C. A physical inspection of the loading and unloading equipment shall be conducted daily during operations. The manufacturer's maintenance and operating instructions for the equipment shall be followed.
- D. Any malfunction or condition of upset which may cause visible emissions above an opacity of 20% from the solid material hopper shall be reported to this Division in a reasonable amount of time, no later than 5:00pm of the following business day.
- E. Any spills or leakages of more than a reportable quantity shall be reported to this Division no later than 5:00pm of the following business day.
- F. Failure to submit an Emission Inventory Questionnaire as required each year may result in revocation of this permit.

Conditions A and C in Section II were imposed to limit VOC and HAP emissions below the de minimis levels because the unconditioned potential emissions exceeded these values. Due to changes in operation and the decommissioning of previous emission units, the unconditioned potential emissions of the installation are currently below the de minimis levels; therefore, Conditions A and C are no longer necessary.

The installation previously operated a bulk solids transfer operation which no longer exists. No solids storage or loadout currently takes place at the terminal; therefore, Limitations B, D, E, and the PM₁₀ emission limit of C in Section II, as well as Conditions B and D in Section III no longer apply.

Conditions D and E in Section III are covered under 10 CSR 10-6.050 *Start-Up, Shutdown, and Malfunction Conditions*; therefore, these provisions are not required to be included in the permit as special conditions.

Condition F in Section III is covered under 10 CSR 10-6.110 *Reporting Emission Data, Emission Fees, and Process Information* and is, therefore, not required to be included in the permit as a special condition.

Any recordkeeping required by Section IV of Construction Permit No. 99-02-009SC that is associated with a superseded Section II: Limitations or Section III: Conditions is subsequently no longer required.

Current equipment and operations at the facility are different than they were at the time Construction Permit No. 99-02-009SC was issued; therefore, VOC and HAP emissions were reevaluated in this project to update the installation's potential to emit and to determine whether or not a construction permit is required. Potential VOC and HAP emissions from loading and unloading were calculated using the loading loss equation obtained from AP-42 Section 5.2 *Transportation and Marketing of Petroleum Liquids* (July 2008). A saturation factor of 1.45 was assumed as a worst case loading scenario, and the maximum loading rate is 90,000 pounds per hour. Potential VOC and HAP emissions from working and breathing losses were calculated using a proprietary Emissions Inventory Tracking application, which was developed by Kinder Morgan Terminals, LLC using the EPA's TANKS 4.09D program. Ethylene glycol was considered to be 100% pure volatile HAP, and diethylene glycol is composed of 0.2% ethylene glycol. Table 1 provides a summary of emissions.

Table 1: Installation Emission Summary

Pollutant	Insignificant Emission Exemption Level (lb/hr)	De Minimis Level (ton/yr)	Existing Actual Emissions (ton/yr)	Emission Rate (lb/hr)	Potential Emissions of the Installation (ton/yr)
PM ₁₀	1.0	15.0	0.11	N/A	N/A
VOC	2.75	40.0	0.03	0.050	0.22
Ethylene Glycol	0.5	10.0	N/D	0.048	0.21

N/A = Not Applicable; N/D = Not Determined

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As shown in Table 1, the emission rates of all applicable pollutants are below their respective Insignificant Emission Exemption Levels found in 10 CSR 10-6.061 (3)(A)3.A, and the potential emissions of the installation are all below their respective de minimis levels. As mentioned above, a portion of the special conditions are no longer applicable due to the decommissioning of equipment or changes to the material stored. Other special conditions are duplicate requirements to state rules that still apply. As such, the special conditions and limitations of Construction Permit No. 99-02-009SC have been superseded. Kinder Morgan Terminals, LLC shall submit an applicability determination or construction permit application to the Air Pollution Control Program if any changes are made to the materials handled, equipment, or operations at the current installation.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.oa.mo.gov/ahc.

If you have any questions regarding this amendment, please contact the Missouri Department of Natural Resources' Air Pollution Control Program at P.O. Box 176, Jefferson City, MO 65102 or (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Kendall B. Hale
Permits Section Chief

KBH:rsa

Enclosures

c: St. Louis Regional Office
PAMS File: 2019-07-030

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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 to 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 (3)(E). "Conditions required by permitting authority."

Kinder Morgan Terminals, LLC
St. Louis City (Landgrant 03078)

1. **Superseding Condition**

The conditions of this permit supersede all Section II: Limitations, Section III: Conditions, and Section IV: Recordkeeping Requirements of Construction Permit No. 99-02-009SC, previously issued by the City of St. Louis Department of Public Safety's Division of Air Pollution Control.