



Missouri Department of Natural Resources
Air Pollution Control Program

PART 70

PERMIT TO OPERATE

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

Operating Permit Number: OP2009-027
Expiration Date: AUG 19 2014
Installation ID: 127-0002
Project Number: 2002-09-138

Installation Name and Address

Magellan Pipeline Company, LP
R.R. 1
Palmyra, MO 63461
Marion County

Parent Company's Name and Address

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

Installation Description:

Magellan Pipeline Company - Palmyra transfers petroleum products to and through Missouri by pipeline from out of state. This installation also has the capability to insert additives into products, store products, and load products into trucks.

AUG 20 2009

Effective Date

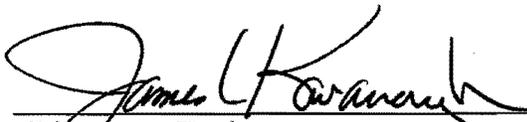

Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	3
INSTALLATION DESCRIPTION	3
EMISSION UNITS WITH LIMITATIONS	3
EMISSION UNITS WITHOUT LIMITATIONS	4
DOCUMENTS INCORPORATED BY REFERENCE.....	4
II. PLANT WIDE EMISSION LIMITATIONS.....	5
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	6
EU0010 AND EU0020 – LOADING RACK AND VAPOR COMBUSTION UNIT (VCU)	6
PERMIT CONDITION (EU0010 and EU0020)-001	6
10 CSR 10-6-075, Maximum Achievable Control Technology.....	6
40 CFR Part 63, Subpart A General Provisions and Subpart R National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)	6
Compliance Plan for VCU Monitoring.....	6
PERMIT CONDITION EU0020-002.....	13
10 CSR 10-6.060, Construction Permits Required.....	13
Construction Permit 0595-002B, Issued 9/13/2002	13
EU0030 – FUGITIVE EMISSIONS FROM EQUIPMENT IN GASOLINE SERVICE.....	14
PERMIT CONDITION EU0030-001.....	14
10 CSR 10-6-075, Maximum Achievable Control Technology.....	14
40 CFR Part 63, Subpart A General Provisions and Subpart R National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)	14
EU0040 THROUGH EU0070 – GASOLINE STORAGE TANKS	16
PERMIT CONDITION (EU0040 through EU0070)-001	16
10 CSR 10-6-075, Maximum Achievable Control Technology.....	16
40 CFR Part 63, Subpart A General Provisions and Subpart R National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)	16
IV. CORE PERMIT REQUIREMENTS	21
V. GENERAL PERMIT REQUIREMENTS.....	27
VI. ATTACHMENTS	33
ATTACHMENT A	34

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Magellan Pipeline Company - Palmyra transfers petroleum products to and through Missouri by pipeline from out of state. This installation also has the capability to insert additives into products, store products, and load products into trucks.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2008	---	---	1.22	9.88	3.04	---	---
2007	---	---	1.07	10.21	4.24	---	---
2006	---	---	2.04	12.74	5.11	---	---
2005	---	---	2.14	10.29	5.36	---	---
2004	---	---	2.37	333.87	5.93	---	---
2003	---	---	0.63	333.7	1.57	---	---
2002	---	---	---	507.21	---	---	---

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit	Emission Pt.
EU0010	Loading Rack	EP01
EU0020	Vapor Combustion Unit (VCU)	EP01
EU0030	Fugitive Emissions from Equipment in Gasoline Service	NA
EU0040	Tank 194	EP03
EU0050	Tank 699	EP04
EU0060	Tank 1396	EP05
EU0070	Tank 1394	EP06

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source

Tank 193: 41,790-gallon distillate storage tank, installed 1964	EP02
Tank 7006: 1,203,290-gallon distillate storage tank, installed 1979	EP07
Tank 1395: 1,723,722-gallon distillate storage tank, installed 1964	EP08
Tank 10: 1,000-gallon additive storage tank	not listed
Tank 40: 1,000-gallon additive storage tank	not listed
Tank 50: 2,000-gallon additive storage tank	not listed
Tank 100: 4,000-gallon additive storage tank, installed 2000	not listed
Tank 110: 2,000-gallon additive storage tank	not listed
Tank 130: 11,750-gallon additive storage tank	not listed
Tank 133: 550-gallon additive storage tank	not listed
Tank 134: 3,000-gallon additive storage tank	not listed

Description of Emission Source

2000-gallon additive storage tank, installed 2005	not listed
Oil/water separator, 3 chambers, 5,040-gallons	not listed

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Construction Permit 0595-002 issued April 29, 1995
 - a) 0595-002A, amended July 5, 1995
 - b) 0595-002B, amended September 13, 2002

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 AND EU0020 – LOADING RACK AND VAPOR COMBUSTION UNIT (VCU)			
Emission Unit	Description	Manufacturer /Model #	2004 EIQ Reference #
EU0010	Loading Rack: bottom-loading rack with 2 loading spots; loads distillate oil and gasoline; MHDR 48 (1000) gal/hr; installed 2003	NA	EP01
EU0020	Vapor Combustion Unit (VCU): combustion system used to control VOC emissions from loading rack; equipped with flame eye to detect flame; installed 2003	John Zink	EP01

PERMIT CONDITION (EU0010 and EU0020)-001
 10 CSR 10-6-075, Maximum Achievable Control Technology
 40 CFR Part 63, Subpart A General Provisions and Subpart R National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)
 Compliance Plan for VCU Monitoring

Emission Limitation:

Emissions to the atmosphere from the vapor collection and processing systems due to the loading of gasoline cargo tanks shall not exceed ten milligrams of total organic compounds (10 mg TOC) per liter of gasoline loaded. [\[§63.422\(b\)\]](#)

Equipment Specifications/Operational Limitations:

40 CFR §60.502 and §63.422

- 1) The permittee shall comply with the equipment specifications in §60.502, except for §60.502(b), (c) and (j), as specified below: [\[§63.422\(a\)\]](#)
 - a) The permittee shall equip each loading rack that loads gasoline cargo tanks at the bulk gasoline terminal with a vapor collection system designed to collect total organic compounds vapors displaced from cargo tanks 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. [\[§60.502\(d\)\]](#)
 - c) Loadings of liquid product into gasoline cargo tanks shall be limited to vapor-tight gasoline cargo tanks using the procedures specified below: [\[§60.502\(e\) and §63.422\(c\)\]](#)
 - i) The permittee shall obtain the vapor tightness documentation described in §60.505(b) for each gasoline cargo tank to be loaded at the facility. [\[§60.502\(e\)\(1\)\]](#)
 - ii) The permittee shall require the tank identification number to be recorded as each gasoline cargo tank is loaded at the facility. [\[§60.502\(e\)\(2\)\]](#)
 - iii) The permittee shall cross-check each tank identification number obtained in §60.502(e)(2) with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded unless either of the following conditions is maintained: [\[§60.502\(e\)\(3\)\(i\)\]](#)

1. If less than 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 quarterly; or [\[§60.502\(e\)\(3\)\(i\)\(A\)\]](#)
2. If less than an average of one gasoline cargo tank per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually. [\[§60.502\(e\)\(3\)\(i\)\(B\)\]](#)
- iv) If either the quarterly or semiannual cross-check provided in §60.502(e)(3)(i)(A) or §60.502(e)(3)(i)(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\(e\)\(3\)\(ii\)\]](#)
- v) The permittee shall notify the owner or operator of each non-vapor-tight gasoline cargo tank loaded at the facility within one week of the documentation cross-check in §60.502(e)(3). [\[§60.502\(e\)\(4\)\]](#)
- vi) The permittee shall take steps assuring that the non-vapor-tight gasoline cargo tank will not be reloaded at the facility until vapor tightness documentation for that gasoline cargo tank is obtained which documents that: [\[§60.502\(e\)\(5\) and §63.422\(c\)\(2\)\]](#)
 1. The gasoline cargo tank meets the requirements in the annual certification test described in §63.425(e); [\[§63.422\(c\)\(2\)\(i\)\]](#)
 2. For each gasoline cargo tank failing the leak detection test in §63.425(f) or the nitrogen pressure decay field test in §63.425(g) at the loading rack, the cargo tank either: [\[§63.422\(c\)\(2\)\(ii\)\]](#)
 - a. Before repair work is performed on the cargo tank, meets the test requirements in the nitrogen pressure decay field test (§63.425(g)) or continuous performance pressure decay test (§63.425(h)), or [\[§63.422\(c\)\(2\)\(ii\)\(A\)\]](#)
 - b. After repair work is performed on the cargo tank before or during the tests in §63.425(g) or (h), subsequently passes the annual certification test described in §63.425(e). [\[§63.422\(c\)\(2\)\(ii\)\(B\)\]](#)
- vii) The permittee may use alternate procedures to those described in §60.502(e)(1) through (e)(5) for limiting gasoline cargo tank loadings upon application to, and approval by, the Administrator. [\[§60.502\(e\)\(6\)\]](#) (Use of automated card in system that will not allow a driver to card in and load if they do not have a valid vapor tightness certification is an approved procedure to implement the requirements of this Subpart. The record keeping requirements for this method are described under “Record Keeping” - paragraphs 4 (b) (i) and (ii).)
- d) The permittee shall act to assure that loadings of gasoline cargo tanks 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\(f\)\]](#)
- e) The permittee shall act to assure that the terminal’s and the cargo tank’s vapor collection systems are connected during each loading of a gasoline cargo tank 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\(g\)\]](#)
- f) The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures below which are specified in §60.503(d). [\[§60.502\(h\)\]](#)

- i) A pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with ± 2.5 mm of water precision, shall be calibrated and installed on the terminal's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline tank truck. [\[§60.503\(d\)\(1\)\]](#)
- ii) During the performance test, the pressure shall be recorded every 5 minutes while a gasoline truck is being loaded; the highest instantaneous pressure that occurs during each loading shall also be recorded. Every loading position must be tested at least once during the performance test. [\[§60.503\(d\)\(2\)\]](#)
- g) No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water). [\[§60.502\(i\)\]](#)

Testing:

- 1) Annual Certification Test. The annual certification test for gasoline cargo tanks shall consist of the following test methods and procedures: [\[§63.425\(e\)\]](#)
 - a) Method 27, appendix A, 40 CFR Part 60. Conduct the test using a time period (t) for the pressure and vacuum tests of 5 minutes. The initial pressure (P_i) for the pressure test shall be 460 mm H₂O (18 in. H₂O), gauge. The initial vacuum (V_i) for the vacuum test shall be 150 mm H₂O (6 in. H₂O), gauge. The maximum allowable pressure and vacuum changes (Δp , Δv) are as shown in the second column of Table 2 of §63.425(e)(1). [\[§63.425\(e\)\(1\)\]](#)

Table 2 - Allowable Cargo Tank Test Pressure or Vacuum Change

Cargo tank or compartment	Annual certification-allowable pressure or vacuum change capacity (Δp , Δv), in 5 minutes, mm H ₂ O (in. H ₂ O)	Allowable pressure change (Δp) in 5 minutes, at any time, mm H ₂ O (in. H ₂ O)
9,464 or more (2,500 or more)	25 (1.0)	64 (2.5)
9,463 to 5,678 (2,499 to 1,500)	38 (1.5)	76 (3.0)
5,679 to 3,785 (1,499 to 1,000)	51 (2.0)	89 (3.5)
3,782 or less (999 or less)	64 (2.5)	102 (4.0)

- b) Pressure test of the cargo tank's internal vapor valve as follows: [\[§63.425\(e\)\(2\)\]](#)
 - i) After completing the tests under §63.425(e)(1), use the procedures in Method 27 to repressurize the tank to 460 mm H₂O (18 in. H₂O), gauge. Close the tank's internal vapor valve(s), thereby isolating the vapor return line and manifold from the tank. [\[§63.425\(e\)\(2\)\(i\)\]](#)
 - ii) Relieve the pressure in the vapor return line to atmospheric pressure, then reseal the line. After 5 minutes, record the gauge pressure in the vapor return line and manifold. The maximum allowable 5-minute pressure increase is 130 mm H₂O (5 in. H₂O). [\[§63.425\(e\)\(2\)\(ii\)\]](#)
- 2) Leak Detection Test. The leak detection test shall be performed using Method 21, appendix A, 40 CFR Part 60, except omit Section 4.3.2 of Method 21. A vapor-tight gasoline cargo tank shall have no leaks at any time when tested according to the procedures in this paragraph. [\[§63.425\(f\)\]](#)
 - a) The leak definition shall be 21,000 ppm as propane. Use propane to calibrate the instrument, setting the span at the leak definition. The response time to 90 percent of the final stable reading shall be less than 8 seconds for the detector with the sampling line and probe attached. [\[§63.425\(f\)\(1\)\]](#)
 - b) In addition to the procedures in Method 21, include the following procedures: [\[§63.425\(f\)\(2\)\]](#)

- i) Perform the test on each compartment during loading of that compartment or while the compartment is still under pressure. [§63.425(f)(2)(i)]
 - ii) To eliminate a positive instrument drift, the dwell time for each leak detection shall not exceed two times the instrument response time. Purge the instrument with ambient air between each leak detection. The duration of the purge shall be in excess of two instrument response times. [§63.425(f)(2)(ii)]
 - iii) Attempt to block the wind from the area being monitored. Record the highest detector reading and location for each leak. [§63.425(f)(2)(iii)]
- 3) Nitrogen Pressure Decay Field Test. For those cargo tanks with manifolded product lines, this test procedure shall be conducted on each compartment. [§63.425(g)]
- a) Record the cargo tank capacity. Upon completion of the loading operation, record the total volume loaded. Seal the cargo tank vapor collection system at the vapor coupler. The sealing apparatus shall have a pressure tap. Open the internal vapor valve(s) of the cargo tank and record the initial headspace pressure. Reduce or increase, as necessary, the initial headspace pressure to 460 mm H₂O (18.0 in. H₂O), gauge by releasing pressure or by adding commercial grade nitrogen gas from a high pressure cylinder capable of maintaining a pressure of 2,000 psig. [§63.425(g)(1)]
 - i) The cylinder shall be equipped with a compatible two-stage regulator with a relief valve and a flow control metering valve. The flow rate of the nitrogen shall be no less than 2 cfm. The maximum allowable time to pressurize cargo tanks with headspace volumes of 1,000 gallons or less to the appropriate pressure is 4 minutes. For cargo tanks with a headspace of greater than 1,000 gallons, use as a maximum allowable time to pressurize 4 minutes or the result from the equation below, whichever is greater. [§63.425(g)(1)(i)]
$$T = V_h \times 0.004$$
Where:
T = maximum allowable time to pressurize the cargo tank, min;
V_h = cargo tank headspace volume during testing, gal.
 - b) It is recommended that after the cargo tank headspace pressure reaches approximately 460 mm H₂O (18 in. H₂O), gauge, a fine adjust valve be used to adjust the headspace pressure to 460 mm H₂O (18.0 in. H₂O), gauge for the next 30 ±5 seconds. [§63.425(g)(2)]
 - c) Reseal the cargo tank vapor collection system and record the headspace pressure after 1 minute. The measured headspace pressure after 1 minute shall be greater than the minimum allowable final headspace pressure (PF) as calculated from the following equation: [§63.425(g)(3)]
$$P_F = 18 \left\{ \frac{(18 - N)}{18} \right\}^{(V_s/V_h)}$$
Where:
(P_F) = minimum allowable final headspace pressure, in. H₂O, gauge;
V_s = total cargo tank shell capacity, gal;
V_h = cargo tank headspace volume after loading, gal;
18.0 = initial pressure at start of test, in. H₂O, gauge;
N = 5-minute continuous performance standard at any time from the third column of Table 2 of §63.425(e)(i), inches H₂O.
 - d) Conduct the internal vapor valve portion of this test by repressurizing the cargo tank headspace with nitrogen to 460 mm H₂O (18 in. H₂O), gauge. Close the internal vapor valve(s), wait for 30 ±5 seconds, then relieve the pressure downstream of the vapor valve in the vapor collection system to atmospheric pressure. Wait 15 seconds, then reseal the vapor collection system. Measure and record the pressure every minute for 5 minutes. Within 5 seconds of the pressure

measurement at the end of 5 minutes, open the vapor valve and record the headspace pressure as the “final pressure.” [§63.425(g)(4)]

- e) If the decrease in pressure in the vapor collection system is less than at least one of the interval pressure change values in Table 3 of this paragraph, or if the final pressure is equal to or greater than 20 percent of the 1-minute final headspace pressure determined in the test in §63.425(g)(3), then the cargo tank is considered to be a vapor-tight gasoline cargo tank. [§63.425(g)(5)]

Table 3 Pressure Change for Internal Vapor Valve Test

Time interval	Interval pressure change, mm H ₂ O (in. H ₂ O)
After 1 minutes	28 (1.1)
After 2 minutes	56 (2.2)
After 3 minutes	84 (3.3)
After 4 minutes	112 (4.4)
After 5 minutes	140 (5.5)

- 4) Continuous Performance Pressure Decay Test. The continuous performance pressure decay test shall be performed using Method 27, appendix A, 40 CFR Part 60. Conduct only the positive pressure test using a time period (t) of 5 minutes. The initial pressure (P_i) shall be 460 mm H₂O (18 in. H₂O), gauge. The maximum allowable 5-minute pressure change (Δ p) which shall be met at any time is shown in the third column of Table 2 of §63.425(e)(1). [§63.425(h)]

Monitoring:

40 CFR §63.427

- 1) The permittee shall install, calibrate, certify, operate, and maintain, according to the manufacturer’s specifications, a continuous monitoring system (CMS) as specified in §63.427(a)(1), (a)(2), (a)(3), or (a)(4) except as allowed in §63.427(a)(5). The permittee has chosen to use a flame eye to continuously monitor for the presence of a flame as an alternative continuous monitoring system as allowed in §63.427(a)(5). The flame eye monitors the vapor combustion system for the presence of a flame. Once the presence of a flame is verified, a signal is generated enabling the loading rack to operate and allowing vapors to enter the combustion chamber for destruction. If the flame is not present, the flame eye will transmit a signal and the vapor combustion system will shut down. The permittee shall discontinue loading when the vapor combustion system goes down. No new trucks shall be allowed to card in until the vapor combustion system is repaired. [§63.427(a)]
- 2) The permittee shall operate the flame eye in a manner to continuously verify the presence of a flame in the vapor combustion unit. Operation of the vapor processing system in a manner not as specified above shall constitute a violation of the emission standard in §63.422(b). [§63.427(b)]

Compliance Plan Conditions:

- 1) The permittee shall resubmit to EPA the request for approval of this alternative monitoring approach. Magellan shall include all of the information required that would enable EPA to evaluate this request. The information submitted should enable EPA to understand why compliance with the monitoring requirements under MACT Subpart R is technically or economically infeasible, or impractical, and why the alternative monitoring method is necessary.
- 2) Magellan shall submit all of the information requested by the letter from the US EPA which was sent to Magellan in July 2009. A copy of this letter is provided as Attachment A to this permit.
- 3) Once a determination has been made regarding the request for alternative monitoring for the VCU, Magellan shall modify this operating permit within a timely manner.

40 CFR §63.8

The permittee shall comply with applicable monitoring requirements of 40 CFR Part 63 Subpart A - General Provisions as indicated in Table 1 of Subpart R.

Recordkeeping:

40 CFR §63.10

The permittee shall comply with applicable recordkeeping requirements of 40 CFR Part 63 Subpart A - General Provisions as indicated in Table 1 of Subpart R.

40 CFR §63.428

- 1) The permittee shall keep records of the test results for each gasoline cargo tank loading at the facility as specified below: [\[§63.428\(b\)\]](#)
 - a) Annual certification testing performed under §63.425(e). [\[§63.428\(b\)\(1\)\]](#)
 - b) Continuous performance testing performed at any time under §63.425(f), (g), and (h). [\[§63.428\(b\)\(2\)\]](#)
 - c) The up-to-date documentation file for each gasoline cargo tank loading at the facility. The documentation for each test shall include, at a minimum, the following information: [\[§63.428\(b\)\(3\)\]](#)
 - i) Name of test; Annual Certification Test – Method 27 (§63.425(e)(1)); Annual Certification Test – Internal Vapor Valve (§63.425(e)(2)); Leak Detection Test (§63.425(f)); Nitrogen Pressure Decay Field Test (§63.425(g)); or Continuous Performance Pressure Decay Test (§63.425(h)). [\[§63.428\(b\)\(3\)\(i\)\]](#)
 - ii) Cargo tank owner’s name and address; [\[§63.428\(b\)\(3\)\(ii\)\]](#)
 - iii) Cargo tank identification number; [\[§63.428\(b\)\(3\)\(iii\)\]](#)
 - iv) Test location and date; [\[§63.428\(b\)\(3\)\(iv\)\]](#)
 - v) Tester name and signature; [\[§63.428\(b\)\(3\)\(v\)\]](#)
 - vi) Witnessing inspector, if any: name, signature, and affiliation; [\[§63.428\(b\)\(3\)\(vi\)\]](#)
 - vii) Vapor tightness repair, nature of repair, and when performed in relation to vapor tightness; [\[§63.428\(b\)\(3\)\(vii\)\]](#)
 - viii) Test results: test pressure, pressure or vacuum change, mm of water; time period of test; number of leaks found with instrument and leak definition. [\[§63.428\(b\)\(3\)\(viii\)\]](#)
- 2) The permittee shall: [\[§63.428\(c\)\]](#)
 - a) Keep an up-to-date, readily accessible record of the continuous operation of the flame eye as required under §63.427(a)(5). This record shall indicate the time intervals during which loadings of gasoline cargo tanks have occurred or alternatively, shall record the operating parameter data only during such loadings. The date and time of day shall also be indicated at reasonable intervals on this record. [\[§63.428\(c\)\(1\)\]](#)
 - b) Record and report simultaneously with the notification of compliance status required under §63.9(h) including: [\[§63.428\(c\)\(2\)\]](#)
 - i) All data and calculations, engineering assessments, and manufacturer's recommendations used in determining the operating parameter value under §63.425(b); and [\[§63.428\(c\)\(2\)\(i\)\]](#)
 - ii) §63.428(c)(2)(ii) is not applicable because the facility is not using a flare under the provisions of §63.11(b) to comply with §63.422(b): [\[§63.428\(c\)\(2\)\(ii\)\]](#)
 - c) The permittee shall comply with the alternative proposed recordkeeping and reporting procedures as follows: [\[§63.428\(c\)\(3\)\]](#)
 - i) The permittee shall record time down, product loaded, reason for downtime and corrective action anytime the vapor combustion system is down and gasoline loading is occurring.

- ii) The permittee shall implement an internal system that shall electronically tag any Bill of Lading (BOL) where product was loaded while the vapor combustion system was not operating. An email shall be sent out to the supervisor, facility technician, and air specialist indicating the vapor combustion system was down and loading occurred. A query shall then be run on an internal database to determine exactly how much product was loaded.
- 3) As an alternative to keeping records at the terminal of each gasoline cargo tank test result as required in §63.428(b) and listed in paragraph 1) of this section, the permittee may comply with the requirements in either §63.428(k)(1) or (2). [\[§63.428\(k\)\]](#)
 - a) An electronic copy of each record is instantly available at the terminal. [\[§63.428\(k\)\(1\)\]](#)
 - i) The copy of each record in §63.428(k)(1) is an exact duplicate image of the original paper record with certifying signatures. [\[§63.428\(k\)\(1\)\(i\)\]](#)
 - ii) The permitting authority is notified in writing that each terminal using this alternative is in compliance with §63.428(k)(1). [\[§63.428\(k\)\(1\)\(ii\)\]](#)
 - b) For facilities that utilize a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (*e.g.*, via a card lock-out system), a copy of the documentation is made available (*e.g.*, via facsimile) for inspection by permitting authority representatives during the course of a site visit, or within a mutually agreeable time frame. [\[§63.428\(k\)\(2\)\]](#)
 - i) The copy of each record in §63.428(k)(2) is an exact duplicate image of the original paper record with certifying signatures. [\[§63.428\(k\)\(2\)\(i\)\]](#)
 - ii) The permitting authority is notified in writing that each terminal using this alternative is in compliance with §63.428(k)(2). [\[§63.428\(k\)\(2\)\(ii\)\]](#)

General

- 1) These records shall be kept for at least 5 years. They shall be kept on-site for at least 2 years. They may be kept in either hard-copy or on computer media.
- 2) These records shall be made available for inspection by Department of Natural Resources' personnel upon their verbal request and presentation of identification.

Reporting:

40 CFR §63.9 and §63.10

The permittee shall comply with applicable reporting and notification requirements of 40 CFR Part 63 Subpart A - General Provisions as indicated in Table 1 of Subpart R.

40 CFR §63.428

- 1) The permittee shall submit a semiannual report* to the Administrator including the following information: [\[§63.428\(g\)\]](#)
 - a) Each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained. [\[§63.428\(g\)\(1\)\]](#)
 - b) Reporting requirements established by §63.428(g)(2) and (g)(3) are listed in Permit Condition EU0030-001 and Permit Condition (EU0040 through EU0070)-001, respectively.
- 2) The permittee shall submit a semiannual excess emissions report** to the Administrator in accordance with §63.10(e)(3), whether or not a CMS is installed at the facility. The following occurrences are excess emissions events, and the following information shall be included in the excess emissions report, as applicable. [\[§63.428\(h\)\]](#)
 - a) Each exceedance or failure to maintain, as appropriate, the monitored operating parameter value determined under §63.425(b). The report shall include the monitoring data for the days on which

exceedances or failures to maintain have occurred, and a description and timing of the steps taken to repair or perform maintenance on the vapor collection and processing systems or the CMS. [[§63.428\(h\)\(1\)](#)]

- b) Each instance of a non-vapor-tight gasoline cargo tank loading in which the permittee failed to take steps to assure that such cargo tank would not be reloaded before vapor tightness documentation for that cargo tank was obtained. [[§63.428\(h\)\(2\)](#)]
- c) Each reloading of a non-vapor-tight gasoline cargo tank before vapor tightness documentation for that cargo tank is obtained in accordance with §63.422(c)(2). [[§63.428\(h\)\(3\)](#)]
- d) The reporting requirement in §63.428(h)(4) is listed in Permit Condition EU0030-001.

*Note: This is the same semiannual report specified in the Reporting section of Permit Condition EU0030-001 and Permit Condition (EU0040 through EU0070)-001.

**Note: This is the same semiannual excess emissions report specified in the Reporting section of Permit Condition EU0030-001.

General

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could cause an exceedance of this regulation.

PERMIT CONDITION EU0020-002

10 CSR 10-6.060, Construction Permits Required
Construction Permit 0595-002B, Issued September 13, 2002

Operational Limitations/Recordkeeping:

- 1) No fuels other than liquefied petroleum shall be combusted in the vapor combustion unit (VCU) at any time. [[Special Condition 5](#)]
- 2) The permittee shall operate and maintain the vapor combustion unit (VCU) in accordance with manufacturer's specifications and in good engineering practices at all times. The permittee shall maintain operating and maintenance logs for the VCU. These logs shall include the following: [[Special Condition 6](#)]
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after any deviation from the terms imposed by this permit condition.

EU0030 – FUGITIVE EMISSIONS FROM EQUIPMENT IN GASOLINE SERVICE			
Emission Unit	Description	Manufacturer/Model #	2004 EIQ Reference #
EU0030	Facility-wide fugitive emissions from valves, pumps, and flanges in gasoline service	Various	NA

PERMIT CONDITION EU0030-001
10 CSR 10-6-075, Maximum Achievable Control Technology
40 CFR Part 63, Subpart A General Provisions and Subpart R National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)

Emission Limitations/Monitoring:

- 1) The permittee shall perform a monthly leak inspection of all equipment in gasoline service. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. The permittee shall inspect each piece of equipment during the loading of a gasoline cargo tank. [§63.424(a)]
- 2) A log book shall be used and shall be signed by the permittee at the completion of each inspection. A section of the log shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility. [§63.424(b)]
- 3) Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak, except as provided in §63.424(d). [§63.424(c)]
- 4) Delay of repair of leaking equipment will be allowed upon a demonstration to the Administrator that repair within 15 days is not feasible. The permittee shall provide the reason(s) a delay is needed and the date by which each repair is expected to be completed. [§63.424(d)]
- 5) As an alternative to compliance with the provisions of §63.424(a) through (d), the permittee may implement an instrument leak monitoring program that has been demonstrated to the Administrator as at least equivalent. [§63.424(f)]
- 6) The permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: [§63.424(g)]
 - a) Minimize gasoline spills; [§63.424(g)(1)]
 - b) Clean up spills as expeditiously as practicable; [§63.424(g)(2)]
 - c) Cover all open gasoline containers with a gasketed seal when not in use; [§63.424(g)(3)]
 - d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators. [§63.424(g)(4)]

Recordkeeping:

- 1) The permittee shall record the following information in the log book for each leak that is detected: [§63.428(e)]
 - a) The equipment type and identification number; [§63.428(e)(1)]
 - b) The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell); [§63.428(e)(2)]
 - c) The date the leak was detected and the date of each attempt to repair the leak; [§63.428(e)(3)]
 - d) Repair methods applied in each attempt to repair the leak; [§63.428(e)(4)]
 - e) “Repair delayed” and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak; [§63.428(e)(5)]

- f) The expected date of successful repair of the leak if the leak is not repaired within 15 days; and [\[§63.428\(e\)\(6\)\]](#)
- g) The date of successful repair of the leak. [\[§63.428\(e\)\(7\)\]](#)
- 2) These records shall be kept for at least 5 years. They shall be kept on-site for at least 2 years. They may be kept in either hard-copy or on computer media.
- 3) These records shall be made available for inspection by Department of Natural Resources' personnel upon their verbal request and presentation of identification.

Reporting:

40 CFR §63.428(g)

- 1) The permittee shall report to the Administrator a description of the types, identification numbers, and locations of all equipment in gasoline service. For facilities electing to implement an instrument program under §63.424(f), the report shall contain a full description of the program. [\[§63.428\(f\)\]](#)
- 2) The permittee shall submit a semiannual report* to the Administrator including the following information: [\[§63.428\(g\)\]](#)
 - a) Reporting requirements in §§63.428(g)(1) and (g)(2) are listed in Permit Condition (EU0010 and EU0020)-001 and Permit Condition (EU0040 through EU0070)-001, respectively.
 - b) The number of equipment leaks not repaired within 5 days after detection. [\[§63.428\(g\)\(3\)\]](#)
- 3) The permittee shall submit a semiannual excess emissions report** to the Administrator in accordance with §63.10(e)(3), whether or not a CMS is installed at the facility. The following occurrences are excess emissions events, and the following information shall be included in the excess emissions report, as applicable. [\[§63.428\(h\)\]](#)
 - a) Reporting requirements in §§63.428(h)(1) through (h)(3) are listed in Permit Condition (EU0010 and EU0020)-001.
 - b) For each occurrence of an equipment leak for which no repair attempt was made within 5 days or for which repair was not completed within 15 days after detection: [\[§63.428\(h\)\(4\)\]](#)
 - i) The date on which the leak was detected; [\[§63.428\(h\)\(4\)\(i\)\]](#)
 - ii) The date of each attempt to repair the leak; [\[§63.428\(h\)\(4\)\(ii\)\]](#)
 - iii) The reasons for the delay of repair; and [\[§63.428\(h\)\(4\)\(iii\)\]](#)
 - iv) The date of successful repair. [\[§63.428\(h\)\(4\)\(iv\)\]](#)

*Note: This is the same semiannual report specified in the Reporting section of Permit Condition (EU0010 and EU0020)-001 and Permit Condition (EU0040 through EU0070)-001.

**Note: This is the same semiannual excess emissions report specified in the Reporting section of Permit Condition (EU0010 and EU0020)-001.

General

- 1) The permittee shall comply with applicable reporting requirements of 40 CFR Part 63 Subpart A - General Provisions as indicated in Table 1 of Subpart R.
- 2) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could cause an exceedance of this regulation.

EU0040 THROUGH EU0070 – GASOLINE STORAGE TANKS					
Emission Unit	Description	Manufacturer	Year Installed/ Year Modified	Maximum Storage Capacity (Gal)	2004 EIQ Reference #
EU0040	Tank 194: Fixed roof tank in combination with internal floating roof	Unknown	1964/2003	33,222	EP03
EU0050	Tank 699: Fixed roof tank in combination with internal floating roof	Unknown	1965/2003	796,950	EP04
EU0060	Tank 1396: Fixed roof tank in combination with internal floating roof	Unknown	1964/2003	1,663,620	EP05
EU0070	Tank 1394: Fixed roof tank in combination with internal floating roof	Unknown	1964/2003	1,700,328	EP06

PERMIT CONDITION (EU0040 through EU0070)-001
 10 CSR 10-6-075, Maximum Achievable Control Technology
 40 CFR Part 63, Subpart A General Provisions and Subpart R National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)

Equipment Specifications/Operational Limitations:

40 CFR §60.112b and §63.423

- 1) The permittee shall equip each gasoline storage tank with a design capacity greater than or equal to 75 m³ (19,813 gallons) with the requirements of §60.112b(a)(1) through (4), except for the requirements of §§60.112b(a)(1)(iv) through (ix) and 60.112b(a)(2)(ii). EU0040 through EU0070 are each fixed roof tanks in combination with an internal floating roof. Therefore, §60.112b(a)(1), except for the requirements of §§60.112b(a)(1)(iv) through (ix), is the part of this regulation that is applicable. [\[§63.423\(a\)\]](#)
 - a) Fixed Roof in Combination with an Internal Floating Roof - A fixed roof in combination with an internal floating roof meeting the following specifications: [\[§60.112b\(a\)\(1\)\]](#)
 - i) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage tank that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage tank is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. [\[§60.112b\(a\)\(1\)\(i\)\]](#)
 - ii) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage tank and the edge of the internal floating roof: [\[§60.112b\(a\)\(1\)\(ii\)\]](#)
 1. A foam- or liquid filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage tank and the floating roof continuously around the circumference of the tank. [\[§60.112b\(a\)\(1\)\(ii\)\(A\)\]](#)
 2. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage tank and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous. [\[§60.112b\(a\)\(1\)\(ii\)\(B\)\]](#)

3. A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage tank by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof. [\[§60.112b\(a\)\(1\)\(ii\)\(C\)\]](#)
- iii) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface. [\[§60.112b\(a\)\(1\)\(iii\)\]](#)

Monitoring

40 CFR §60.113b and §63.425(d)

- 1) The permittee shall comply with the provisions in §60.113b as follows: [\[§63.425\(d\)\]](#)
 - a) **Permanently Affixed Roof and Internal Floating Roof** - After installing permanently affixed roof and internal floating roof, the permittee shall: [\[§60.113b\(a\)\]](#)
 - i) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage tank with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage tank. [\[§60.113b\(a\)\(1\)\]](#)
 - ii) For tanks equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage tank, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage tank from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the tank cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the tank will be emptied as soon as possible. [\[§60.113b\(a\)\(2\)\]](#)
 - iii) For tanks equipped with a double-seal system as specified in §60.112b(a)(1)(ii)(B): [\[§60.113b\(a\)\(3\)\]](#)
 1. Visually inspect the tank as specified in §60.113b(a)(4) at least every 5 years; or
 2. Visually inspect the tank as specified in §60.113b(a)(2).
 - iv) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage tank is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage tank with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of tanks conducting the annual visual inspection as specified in §60.113b(a)(2) and (a)(3)(ii) and at intervals no greater than 5 years in the case of tanks specified in §60.113b(a)(3)(i). [\[§60.113b\(a\)\(4\)\]](#)

Recordkeeping:

40 CFR §60.116b and §63.427(c)

- 1) The permittee shall comply with the applicable monitoring requirements in §60.116b. [§63.427(c)]
 - a) The permittee shall keep readily accessible records showing the dimension of the storage tank and an analysis showing the capacity of the storage tank for the life of the source. [§60.116b(b)]
 - b) The permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of the VOL during the respective storage period for at least 5 years. [§60.116b(c)]

40 CFR §60.115b and §63.428(d)

- 1) The permittee shall keep records and furnish reports as specified in §60.115b of chapter 40, except records shall be kept for at least 5 years. [§63.428(d)]
 - a) The permittee shall keep records and furnish reports as required by §60.115b(a), (b), or (c) depending upon the control equipment installed to meet the requirements of §60.112b. The permittee has installed a fixed roof and internal floating roof on EU0040 through EU0070, therefore the part of this regulation that is applicable is §60.115b(a). [§60.115b]
 - b) Fixed Roof and Internal Floating Roof. After installing a fixed roof and internal floating roof, the permittee shall meet the following requirements. [§60.115b(a)]
 - i) Furnish the Administrator with a report that describes the control equipment and certifies that the control equipment meets the specifications of §60.112b(a)(1) and §60.113b(a)(1). This report shall be an attachment to the notification required by §60.7(a)(3). [§60.115b(a)(1)]
 - ii) Keep a record of each inspection performed as required by §60.113b (a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage tank on which the inspection was performed and shall contain the date the tank was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). [§60.115b(a)(2)]
 - iii) If any of the conditions described in §60.113b(a)(2) are detected during the annual visual inspection required by §60.113b(a)(2), a report shall be furnished to the Administrator within 30 days of the inspection. Each report shall identify the storage tank, the nature of the defects, and the date the storage tank was emptied or the nature of and date the repair was made. [§60.115b(a)(3)]
 - iv) After each inspection required by §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in §60.113b(a)(3)(ii), a report shall be furnished to the Administrator within 30 days of the inspection. The report shall identify the storage tank and the reason it did not meet the specifications of §60.112b(a)(1) or §60.113b(a)(3) and list each repair made. [§60.115b(a)(4)]

General

- 1) The permittee shall comply with applicable recordkeeping requirements of 40 CFR Part 63 Subpart A - General Provisions as indicated in Table 1 of Subpart R.
- 2) All records may be kept in either hard copy form or on computer media. The records showing the dimension of the storage tank and an analysis showing the capacity of the storage tank shall be kept for the life of the source. All other records shall be kept for at least 5 years. They shall be kept on-site for at least 2 years.

- 3) These records shall be made available for inspection by Department of Natural Resources' personnel upon their verbal request and presentation of identification.

Reporting:

40 CFR §60.115b and §63.428

- 1) The permittee shall notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage tank for which an inspection is required by §60.113b(a)(1) and (a)(4) to afford the Administrator the opportunity to have an observer present. If the inspection required by §60.113b(a)(4) is not planned and the permittee could not have known about the inspection 30 days in advance or refilling the tank, the permittee shall notify the Administrator at least 7 days prior to the refilling of the storage tank. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator at least 7 days prior to the refilling. [\[§60.113b\(a\)\(5\)\]](#)
- 2) The permittee shall submit a semiannual report* to the Administrator including the following information: [\[§63.428\(g\)\]](#)
 - a) Reporting requirements established by §63.428(g)(1) and (g)(3) are listed in Permit Condition (EU0010 and EU0020)-001 and Permit Condition EU0030-001, respectively.
 - b) Periodic reports required under §63.428(d) as follows: [\[§63.428\(g\)\(2\)\]](#)
 - i) The permittee shall furnish reports as specified in §60.115b as follows: [\[§63.428\(d\)\]](#)
 - ii) For each tank equipped with a fixed roof in combination with an internal floating roof, the permittee shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, not later than 30 days after any of the conditions described in §60.113b(a)(2) and in the Monitoring section of this permit condition are detected during the annual visual inspection required by §60.113b(a)(2). Each report shall identify the storage tank, the nature of the defects, and the date the storage tank was emptied or the nature of and date the repair was made. [\[§60.115b\(a\)\(3\)\]](#)
 - iii) For each tank equipped with a fixed roof in combination with an internal floating roof, the permittee shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, within 30 days of any inspection required by §60.113b(a)(3) and in the Monitoring section of this permit condition that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in §60.113b(a)(3)(ii). The report shall identify the storage tank and the reason it did not meet the specifications of §61.112b(a)(1) or §60.113b(a)(3) and list each repair made. [\[§60.115b\(a\)\(4\)\]](#)
 - iv) For each tank equipped with a an external floating roof, the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, within 30 days of any seal gap measurement that detects gaps exceeding the limitations specified by §60.113b(b)(4). The report will identify the tank and contain the information specified in §60.115b(b)(2) and the date the tank was emptied or the repairs made and date of repair. [\[§60.115b\(b\)\(4\)\]](#)

*Note: This is the same semiannual report specified in the Reporting section of Permit Condition (EU0010 and EU0020)-001 and Permit Condition EU0030-001.

General

- 1) The permittee shall comply with applicable reporting requirements of 40 CFR Part 63 Subpart A - General Provisions as indicated in Table 1 of Subpart R.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

- (1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- (2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - (A) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 1. Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
 2. Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
 3. St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
 4. St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - (B) Yard waste, with the following exceptions:
 1. Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 2. Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
 3. St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
 - A. A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
 - B. A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
 - C. The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - D. In each instance, the twenty-one (21)-day burning period shall be determined by the Director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the Department Director; and

4. St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- (3) Certain types of materials may be open burned provided an open burning permit is obtained from the Director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- (4) Magellan Pipelin Company, LP may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Installation Name fails to comply with the provisions or any condition of the open burning permit.
 - (A) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- (5) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
- (6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971 is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the Director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;

- i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the Director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the Director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
 - 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the Director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.
 - 4) Nothing in this rule shall be construed to limit the authority of the Director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
 - 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months.

[10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

[10 CSR 10-6.065(6)(C)3.B]

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) 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 to satisfy the requirements of the Federal Clean Air Act, Title V.

- 3) 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 10-3.090 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.

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 MVAC-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(6)(C)1.B Permit Duration

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

10 CSR 10-6.065(6)(C)1.C General 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's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) January 1st for monitoring which covers the January through June time period, and
 - ii) June 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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

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

10 CSR 10-6.065(6)(C)1.F Severability Clause

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

10 CSR 10-6.065(6)(C)1.G General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to

the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

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

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

None.

10 CSR 10-6.065(6)(C)3 Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by June 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, as well as the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;

- c) Whether compliance was continuous or intermittent;
- d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065(6)(C)6 Permit Shield

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

10 CSR 10-6.065(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

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

under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under Section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

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

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and

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

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

The application utilized in the preparation of this permit was signed by Rick Olson, VP Transportation Operations. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) Missouri Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065(6)(E)1.C Statement of Basis

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

VI. Attachments

No attachments.

Attachment A

The guidance provided in this letter can be used to determine the information that must be supplied to the EPA so that a determination can be made regarding the request for approval of alternative monitoring for Emission Unit EU0020 Vapor Combustion Unit.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

JUL 08 2008

RECEIVED
2008 JUL -6 AM 11:
AIR POLLUTION
CONTROL PGM

Terri Stilwell
Senior Air Quality Specialist
Magellan Midstream Partners, LP
One Williams Center
P.O. Box 22186
Tulsa, OK 74121-2186

Dear Ms. Stilwell:

Thank you for your letter to the United States Environmental Protection Agency ("EPA") dated May 5, 2008, requesting the approval of an alternative monitoring method to the monitoring required under 40 CFR Part 63, Subpart R, National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) ("MACT Subpart R"). Specifically, Magellan Pipeline Company, LP ("Magellan") requested approval for monitoring the presence of a pilot flame for the vapor combustion unit (VCU) in lieu of temperature monitoring at the firebox of the VCU during loading of gasoline for its bulk gasoline terminal facility located in Palmyra, Missouri. See § 63.427. Your letter does not indicate under what provisions you are making this request.

Owners or operators requesting approval for alternative monitoring requests must satisfy the requirements found in 40 CFR Part 63, subpart A (General Provisions) that govern such requests. See § 63.8(f)(4). Also, § 63.427(a)(5) requires owners or operators to demonstrate that monitoring the alternative parameter demonstrates continuous compliance with the emission standard. Finally, § 63.428(c)(3) requires owners or operators requesting approval to monitor an alternative operating parameter to submit a description of the planned reporting and recordkeeping procedures. We discuss all of these requirements below.

Regulatory Background:

Under § 63.8(f)(4), “an owner or operator who wishes to use an alternative monitoring procedure must submit an application” for approval that contains “a description of the proposed alternative monitoring system which addresses the four elements contained in the definition of monitoring in § 63.2.” The four elements defining monitoring, as cited in § 63.2, are as follows:

- 1) Indicator(s) of performance – the parameters you measure or observe for demonstrating proper operation of the pollution control measures or compliance with the applicable emissions limitation or standards. . . . ;

- 2) Measurement techniques – the means by which you gather and record information of or about the indicators of performance. . . . ;

- 3) Monitoring frequency – the number of times you obtain and record monitoring data over a specified time interval. . . . ; and

- 4) Averaging time – the period over which you average and use data to verify proper operation of the pollution control approach or compliance with the emissions limitations or standard

See § 63.2 for a complete description of these elements. In addition, § 63.8(f)(4) states that “the application must include information justifying the owner or operator’s request for an alternative monitoring method, such as the technical or economic infeasibility, or the impracticality, of the affected source using the required method.”

Additionally, an owner or operator making this request for MACT Subpart R must also satisfy the specific requirements contained in MACT Subpart R. Section 63.427(a)(5) indicates that “monitoring an alternative operating parameter or a parameter of a vapor processing system other than those listed in this paragraph will be allowed upon demonstrating to the Administrator’s satisfaction that the alternative parameter demonstrates continuous compliance with the emission standard in § 63.422(b) or § 60.112b(a)(3)(ii) of this chapter.” Section 63.428(c)(3) requires that if “an owner or operator requests approval to use a vapor processing system or monitor an operating parameter other than those specified in § 63.427(a), the owner or operator shall submit a description of planned reporting and recordkeeping procedures.”

Thus, EPA will evaluate Magellan’s application for an alternative monitoring procedure pursuant to §§ 63.8(f), 63.427(a)(5) and 63.428(c)(3).

EPA Response:

The information Magellan provided in its May 5, 2008 letter does not meet the requirements in §§ 63.8(f)(4), 63.427(a)(5) and 63.428(c)(3); thus, EPA is unable to make a decision on your request. We suggest that Magellan resubmit its request under §§ 63.8(f)(4), 63.427(a)(5) and 63.428(c)(3) and include all of the information required for the Palmyra Terminal that would enable EPA to evaluate this alternative monitoring request. For example, the information submitted should enable EPA to understand, for this particular facility, why compliance with the monitoring requirements under MACT Subpart R is technically or economically infeasible, or impractical, and why the alternative monitoring method is necessary.

Since Magellan is requesting approval to monitor an operating parameter other than those listed in § 63.427(a), as required by § 63.427(a)(5), Magellan must also demonstrate to the Administrator's satisfaction that the alternative parameter demonstrates continuous compliance with the emission standards. Note that operating parameters are determined during performance testing. See § 63.425(b). Magellan may determine the best method for making this demonstration. One possibility may be to follow the procedures outlined in § 63.425(b) and substitute the alternative parameter for the operating parameter value. For example, Magellan could first determine and demonstrate the VCU characteristics that represent normal site-specific operating conditions (or range of conditions). Then Magellan could monitor the alternative monitoring parameter(s) while emission testing the VCU during those conditions (or range of conditions) to demonstrate continuous compliance with the emission standard. Finally, Magellan could document and present the results as part of its alternative monitoring request. If Magellan does follow the approach described in this paragraph, you are still liable for any violations that may arise from testing with the alternative parameters.

Finally, § 63.428(c)(3) requires that Magellan also submit a description of its planned reporting and recordkeeping procedures since Magellan is requesting approval to monitor an operating parameter other than those specified in § 63.427(a). Magellan should submit a description of the planned reporting and recordkeeping procedures envisioned under the alternative monitoring scenario. For example, the recordkeeping and reporting requirements for facilities monitoring in accordance with § 63.427(a) are contained in § 63.428(c)(1) and (2). Magellan should describe how it will comply with these requirements when it submits its description of the planned reporting and recordkeeping procedures envisioned under the alternative monitoring scenario.

If you would like to discuss this response further, please contact Bill Peterson at (913) 551-7881.

Sincerely,



Mark A. Smith

Chief

Air Permitting & Compliance Branch

cc: Susan Stahle, OGC, EPA HQ
Mamie Miller, OC, OECA, EPA HQ
Steve Shedd, OAQPS, EPA HQ
Tahani Rivers, AED, EPA HQ
Jill Wade, Missouri Department of Natural Resources

STATEMENT OF BASIS

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Part 70 Operating Permit Application, received September 23, 2002, revised December 29, 2003
- 2) 2004 Emissions Inventory Questionnaire, received March 29, 2005;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Historical Notes:

- 1) On September 21, 2001, Magellan Pipeline Company received a notice of violation (NOV) for failure to maintain the 25 ton per 12-consecutive month limit for total HAP and failure to implement the requirements of 10 CSR 10-6.075 and 40 CFR Part 63 Subpart R. As a consequence to the violation, the installation is now subject to 10 CSR 10-6.075 and 40 CFR Part 63 Subpart R. In order to comply with the MACT requirements, the installation constructed a new petroleum liquids loading rack (EU0010) with a vapor combustion unit (EU0020). After completion of the construction of the loading rack, the potential to emit from the installation is less than major source levels. However, even though the installation became a minor source, since the installation was subject to 40 CFR Part 63 Subpart R and the installation was a major source after the initial compliance date of Subpart R, the installation is subject to all major source requirements including the requirement to have a Part 70 permit because of the EPA "once in always in" policy.
- 2) The previous operating permit (OP 127-0002-0001) included an emissions limit (II.A.1.) which limited the quantity of product processed through the loading rack to no more than 5,000,000 barrels (200,000,000 gallons) of total product in any consecutive 12-month period and required periodic sampling and analysis of each product line dispensed from the installation. This limit was included in the previous operating permit to avoid the requirements of 40 CFR Part 63 Subpart R. The permittee requested to remove these requirements because there is no longer the need to demonstrate that the installation is below MACT thresholds since the installation is now subject to 10 CSR 10-6.075 and 40 CFR Part 63 Subpart R. Therefore, the requirements to limit the quantity of product processed through the loading rack and to conduct an analysis of the HAP content of the product are not included in this operating permit.
- 3) The previous operating permit (OP 127-0002-0001) included a recordkeeping requirement (III.A.1.) which required the permittee to maintain records on-site which show the monthly throughput from the 1,000 gallon additive storage tank. This condition was initially established by Special Condition No. 1 of Construction Permit 0595-002A. This condition is not included in this operating permit because all special conditions of Construction Permit 0595-002A was superseded by Construction Permit 0595-002B and are no longer applicable.

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.

- 1) 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants* was included in the operating permit because the regulation applies to the Vapor Combustion Unit (EU0020). This regulation was not listed on past application forms issued by the Air Pollution Control Program, including the application for this permit.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

- 1) 10 CSR 10-6.100, *Alternate Emission Limits* does not apply to this installation because the installation is not in a non-attainment area for ozone.
- 2) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes* was marked as applicable in the permit application. However, there are no emission units at the installation that at maximum design capacity have a potential to emit one-half (0.5) pounds per hour or more of particulate matter. Therefore, this rule is not included in this operating permit.
- 3) 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants* does not apply to the Vapor Combustion Unit (EU0020 because it is not a source of visible emissions. This unit does not emit dust or smoke – the only emission from the stack is heat.

Construction Permit Revisions

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

- 1) Construction Permit 0595-002B included compliance performance testing requirements (Special Conditions 2, 3 and 4) and requirements to dismantle the old loading rack (Special Condition 7). Since the compliance performance testing and dismantling of the old loading rack have been completed by the permittee, these special conditions are not included in this operating permit.

NSPS Applicability

- 1) 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* is not applicable to the following storage tanks because they were installed prior to the applicability date of June 11, 1973.
 - a) Tank 193: 41,790-gallon distilled storage tank, installed 1964
 - b) Tank 1395: 1,723,722-gallon distillate storage tank, installed 1964

- 2) 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* is not applicable to the following storage tank because the storage tank stores distillate.
 - a) Tank 7006: 1,203,290-gallon distillate storage tank, installed 1979
- 3) 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*
 - a) Per 40 CFR §63.420(g), each owner or operator subject to the provisions of 40 CFR Part 63 Subpart R is also subject to the applicable provisions of 40 CFR Part 60 Subpart Kb. Permit Condition (EU0040 through EU0070)-001 contain the applicable provisions of this regulation as they apply to the following gasoline storage tanks:
 - i) EU0030: Tank 194: 33,222-gallon gasoline storage tank, installed 1964, retrofitted 2003
 - ii) EU0040: Tank 699: 796,950-gallon gasoline storage tank, installed 1965, retrofitted 2003
 - iii) EU0050: Tank 1396: 1,663,620-gallon gasoline storage tank, installed 1964, retrofitted 2003
 - iv) EU0060: Tank 1394: 1,700,328-gallon gasoline storage tank, installed 1964, retrofitted 2003
 - b) The following tanks are not subject to this regulation because each storage tank has a capacity less than 19,813 gallons (75 m³).
 - i) Tank 10: 1,000-gallon additive storage tank
 - ii) Tank 40: 1,000-gallon additive storage tank
 - iii) Tank 50: 2,000-gallon additive storage tank
 - iv) Tank 100: 4,000-gallon additive storage tank, installed 2000
 - v) Tank 110: 2,000-gallon additive storage tank
 - vi) Tank 130: 11,750-gallon additive storage tank
 - vii) Tank 133: 550-gallon additive storage tank
 - viii) Tank 134: 3,000-gallon additive storage tank
 - ix) 2000-gallon additive storage tank installed 2005
- 4) 40 CFR Part 60 Subpart XX, *Standards of Performance for Bulk Gasoline Terminals*. Per 40 CFR §63.420(g), each owner or operator subject to the provisions of 40 CFR Part 63 Subpart R is also subject to the applicable provisions of 40 CFR Part 60 Subpart XX. Permit Condition (EU0010 and EU0020)-001 contain the applicable provisions of this regulation as they apply to the Loading Rack and VCU.

MACT Applicability

40 CFR Part 63, Subpart R, *National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminal and Pipeline Breakout Stations)* is applicable to the installation because it is a major source of HAP emissions prior to control.

NESHAP Applicability

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants; Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects

underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

None of the other NESHAP standards apply to this installation.

CAM Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)* is not applicable to this installation. Even though there are pollutant-specific emission unit(s) that use a control device(s) to achieve compliance with a relevant standard, the emission units in question are subject to Section 111 or 112 standard(s) promulgated after November 15, 1990. These standards are deemed to have compliance monitoring and recordkeeping requirements at least as stringent as those that would be required by CAM.

Other Regulatory Determinations

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds* does not apply to the Vapor Combustion Unit (EU0020). Per §(1)(A)2, combustion equipment that uses exclusively liquefied petroleum gas, is exempt from this regulation. Permit Condition EU0020-002 restricts the permittee to burning only liquefied petroleum gas in the VCU, therefore, EU0020 is exempt.

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

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

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

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

Prepared by:

Jill S. Wade, P.E.
Environmental Engineer

CERTIFIED MAIL: 70073020000315698265
RETURN RECEIPT REQUESTED

Mr. Rick Olson
VP Transportation Operations
Magellan Pipeline Company Palmyra
R.R. 1
Palmyra, MO 63461

Re: Magellan Pipeline Company Palmyra, 127-0002
Permit Number: OP2009-027

Dear Mr. Olson:

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

You may appeal this permit 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 thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Jill Wade at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:jwk

Enclosures

c: Ms. Tamara Freeman, U.S. EPA Region VII
Northeast Regional Office
PAMS File: 2002-09-138