

PART 70 PERMIT TO OPERATE

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

Operating Permit Number: OP2018-002
Expiration Date: FEB 22 2023
Installation ID: 033-0001
Project Number: 2014-09-044

Installation Name and Address

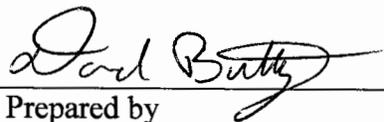
Sinclair Transportation Company, Carrollton
Products Terminal
26036 Old Highway 24
Carrollton, MO 64633
Carroll County

Parent Company's Name and Address

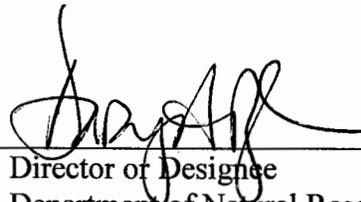
Sinclair Transportation Company
P.O. Box 30825
Salt Lake City UT, 84130-0825

Installation Description:

Sinclair Transportation Company operates a bulk petroleum storage and distribution terminal in Carrollton, MO with an aggregate storage capacity of 15,663,314 gallons. The terminal operates three (3) vertical tanks equipped with internal or external floating roofs storing petroleum products, three (3) vertical fixed roof tanks storing petroleum products, three (3) fixed roof tanks storing oxygenators, and a submerged loading truck rack. The installation also functions as a pipeline pumping station that receives petroleum products from the Olathe terminal in Kansas and pumps products to Montrose terminal in Iowa.



Prepared by
David Buttig
Operating Permit Unit



Director of Designee
Department of Natural Resources

FEB 22 2018

Effective Date

Table of Contents

I. INSTALLATION EQUIPMENT LISTING	4
EMISSION UNITS WITH LIMITATIONS	4
EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS	4
II. PLANT WIDE EMISSION LIMITATIONS.....	5
PERMIT CONDITION PW001	5
40 CFR Part 63 Subpart BBBBBB, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities	5
40 CFR Part 60 Subpart XX, Standards of Performance for Bulk Gasoline Terminals	5
PERMIT CONDITION PW002	7
10 CSR 10-6.060 Construction Permit Required.....	7
Construction Permit 1195-004A, Issued May 29, 1996	7
10 CSR 10-6.065(6)(C)2.A. Voluntary Limitation(s)	7
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	8
PERMIT CONDITION 1	8
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	8
40 CFR Part 63 Subpart BBBBBB National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities	8
Storage Tank Emission Reduction Partnership Program (STERPP) agreement executed March 31, 2001 .	8
PERMIT CONDITION 2	13
10 CSR 10-6.060 Construction Permits Required.....	13
Construction Permit 1195-004A, Issued April 1996	13
PERMIT CONDITION 3	14
40 CFR Part 60 Subpart XX Standards of Performance for Bulk Gasoline Terminals	14
40 CFR Part 63 Subpart BBBBBB National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities	14
40 CFR Part 64 Compliance Assurance Monitoring	14
PERMIT CONDITION 4	26
10 CSR 10-6. 220 Restriction of Emission of Visible Air Contaminants.....	26
PERMIT CONDITION 5	27
40 CFR Part 63 Subpart BBBBBB National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities	27
PERMIT CONDITION 6	32
Voluntary Limitations.....	32
PERMIT CONDITION 7	33
10 CSR 10-6.065(6)(C)2.A. Voluntary Limitation.....	33
PERMIT CONDITION 8	33
40 CFR Part 63 Subpart CCCCCC <i>National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities</i>	33
IV. CORE PERMIT REQUIREMENTS	35
V. GENERAL PERMIT REQUIREMENTS.....	41
VI. ATTACHMENTS	46
ATTACHMENT A	47

Record of Visible Observations Performed	47
ATTACHMENT B.....	48
Method 9 Opacity Emissions Observations.....	48
ATTACHMENT C.....	49
Inspection/Maintenance/Repair/Malfunction Log.....	49
ATTACHMENT D-1	50
Petroleum Product Storage Log for Gasoline Tanks	50
ATTACHMENT D-2	51
Petroleum Product Storage Log for Non-Gasoline Storage Tanks	51
ATTACHMENT E.....	52
Leak Inspection Log Sheet	52
ATTACHMENT F	53
Permit Condition 7: VOC Tracking Sheet.....	53
ATTACHMENT G	54
Compliance Assurance Monitoring Plan	54
ATTACHMENT H	56
Storage Tank Emission Reduction Partnership Program (STERPP) Agreement	56
ATTACHMENT I.....	65
Combined HAPs Compliance.....	65
ATTACHMENT J.....	66
Individual HAPs Compliance.....	66

I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS

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

EQ Emission Unit ##	Description Of Emission Unit
EP-01	Tank #3201: 3.360 million Gallon External Floating Roof Tank; Petroleum Liquid Storage
EP-04	Tank #3204: 2.310 Million Gallon External Floating Roof Tank; Petroleum Liquid Storage
EP-05	Tank #3209: 0.036 Million Gallon Fixed Roof Tank; Water Storage
EP-06	Tank #3212: 3.310 Million Gallon Internal Floating Roof Tank; Petroleum Liquid Storage
EP-07	Two Bay (4-arms per bay) Submerged Loading Truck Rack
N/A	Portable Air Stripper

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

EQ Emission Unit ##	Description Of Emission Unit
EP-02	Tank #3202: 3.300 Million Gallon Vertical Fixed Roof Tank; Fuel Oil Storage
EP-03	Tank #3203: 3.300 Million Gallon Vertical Fixed Roof Tank; Fuel Oil Storage
EP-08	Tank #3239: 0.016 Million Gallon Vertical Fixed Roof Tank; Petroleum Liquid Storage
EP-09	Tank #3240: 0.016 Million Gallon Vertical Fixed Roof Tank; Petroleum Liquid Storage
EP-10	Fugitive Emissions from Pumps, Valves, Fittings, other see detail
EP-11	Tank #3241: 0.016 Million Gallon Vertical Fixed Roof Tank; Petroleum Liquid Storage
N/A	Wastewater/Offspec Product Tank: 10,000 bbl Vertical Fixed Roof Tank
N/A	Tank #3255: #2 Fuel Oil Additive Tank: 2000-gallon Horizontal Tank
N/A	Tank #3254: Red Dye Additive Tank: 630-gallon Horizontal Tank
N/A	Tank #3253: #2 Fuel Oil Additive Tank: 2,000-gallon Horizontal Tank
N/A	Tank #3252: #2 Fuel Oil Additive Tank: 2,080-gallon Horizontal Tank
N/A	Tank #3251: Gasoline Additive: 6,000-gallon Vertical Fixed Roof Tank
N/A	Propane-Fueled Space Heating Equipment (5 Total): 0.40 MMBtu/hr

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations.

PERMIT CONDITION PW001

40 CFR Part 63 Subpart BBBBBB, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities
40 CFR Part 60 Subpart XX, Standards of Performance for Bulk Gasoline Terminals

Emission/Operational Limitation:

- 1) The permittee shall perform a monthly leak inspection of all equipment in gasoline service for total organic compounds liquid or vapor leaks. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. [§63.11089(a)]
 - a) As defined in 40 CFR 63.11100 and 40 CFR 60.502(j), the equipment to be inspected includes:
 - i) Each valve, pump, pressure relief device, sampling connection system, open-ended valve or line, and flange or other connector in the gasoline liquid transfer and vapor collection systems.
 - ii) The entire vapor processing system except the exhaust port(s) or stack(s).
 - iii) The loading racks used to handle gasoline.
 - b) As required by 40 CFR 60.502(j), the vapor processing system and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks.
 - c) As defined in 40 CFR 63.11100, "in gasoline service" means that the equipment is used in a system that transfers gasoline or gasoline vapors.
- 2) When a leak is detected, the permittee shall make an initial attempt at repair as soon as practicable, but no later than 5 calendar days after the leak is detected. [§63.11089(c)]
- 3) The permittee shall complete repair or replacement of leaking equipment within 15 calendar days after detection of each leak, except as provided in §63.11089(d). [§63.11089(c)]
- 4) Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The permittee must document the reason(s) why the repair was not feasible and the date each repair was completed as described under Monitoring/Recordkeeping and include the event on the semiannual excess emissions report described in Reporting. [§63.11089(d)]
- 5) The permittee shall operate and maintain all equipment, including air pollution control equipment, and monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times, including periods of startup, shutdown, and malfunction. Measures to be taken include, but are not limited to, the following:
 - a) Minimize gasoline spills;
 - b) Clean up spills as expeditiously as practicable;
 - c) Cover all open gasoline containers and all gasoline storage fill pipes with a gasketed seal when not in use;
 - d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

- 6) As an alternative to compliance with the provisions in paragraphs (a) through (d) of this section, the permittee may implement an instrument leak monitoring program that has been demonstrated to the Director as at least equivalent.

Monitoring/Recordkeeping:

- 1) The permittee shall prepare and maintain an up-to-date logbook which contains the following information for all equipment in gasoline service:
 - a) A list, summary description, or diagram(s) showing the type, identification number, and location of all equipment in gasoline service;
 - b) All completed and signed leak inspection reports; and
 - c) A record of maintenance and repairs.
 - d) If the permittee elects to implement an instrument monitoring program to comply with the rule, the logbook shall also contain a full description of the monitoring program.
- 2) The permittee shall record the following information for each monthly leak inspection:
 - a) Date of inspection.
 - b) The equipment type and identification number;
 - c) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak). Each finding shall be recorded in the logbook.
 - d) The leak determination method (i.e., sight, sound, or smell).
 - e) If a leak is identified, the permittee must also record the following:
 - i) The nature of the leak (i.e., vapor or liquid)
 - ii) The date of each attempt to repair the leak
 - iii) Repair methods applied in each attempt to repair the leak;
 - iv) "Repair delayed" and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak;
 - v) The expected date of successful repair of the leak if the leak is not repaired within 15 days; and;
 - vi) The date of successful repair of the leak.
 - f) The name and signature of the person completing the inspection.
- 3) An authorized representative of the permittee shall sign the inspection record at the completion of each inspection.
- 4) Attachment E (Leak Inspection Log Sheet) and Attachment C (Inspection, Maintenance, Repair and Malfunction Log) contain logs satisfying these recordkeeping requirements. These logs, or equivalent(s) created by the permittee, must be used to certify compliance with this requirement.
- 5) The permittee shall maintain all records of inspections, maintenance, repairs, and notifications onsite for a minimum of five years.
- 6) The permittee shall immediately make such records available to Missouri Department of Natural Resources personnel upon request.

Reporting:

- 1) The permittee shall submit a semiannual excess emissions report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 at the time the semiannual compliance report is submitted. Each occurrence of an equipment leak for which no repair attempt was made within 5 days or for which repair was not completed within 15 days after detection is an excess emission event. The following information shall be included in the excess emissions report, as applicable:
 - a) The number of equipment leaks not repaired within 15 days after detection.

- 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:
 - i) The date on which the leak was detected;
 - ii) The date of each attempt to repair the leak;
 - iii) The reasons for the delay of repair; and
 - iv) The date of successful repair.
- 2) Reports of any deviations from the monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

PERMIT CONDITION PW002

10 CSR 10-6.060 Construction Permit Required
Construction Permit 1195-004A, Issued May 29, 1996
10 CSR 10-6.065(6)(C)2.A. Voluntary Limitation(s)

Emission Limitations:

- 1) The permittee shall discharge less than 10 tons of any individual hazardous air pollutant (HAP) and less than 25 tons of hazardous air pollutants (HAPs) in aggregate during any consecutive 12-month period.
- 2) This condition establishes an emission cap on all HAP(s) sources at this installation.

Monitoring/Recordkeeping:

- 1) Monthly records shall be kept that are adequate to determine the emissions of HAPs from the installation. These records shall also indicate the total quantity of HAPs emission over the previous 12-month period.
- 2) The permittee shall calculate monthly emissions of HAPs associated with storage, transfer, and handling operations at this installation, including fugitive emissions. The permittee shall record all individual HAP and aggregate HAP emissions on a monthly basis with a consecutive 12-month total.
- 3) Attachments I and J contains a log satisfying these recordkeeping requirements. This log, or an equivalent created by the permittee, shall be used to certify compliance with this requirement.
- 4) The permittee shall maintain these records on site for the most recent 60 months.
- 5) The permittee shall immediately make such records available to any Department of Natural Resources personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month, if the consecutive 12-month total records show that the source exceeded the limitation of less than 10 tons of individual HAP emissions or less than 25 tons of aggregate HAP emissions.
- 2) Reports of any deviations from the monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 1		
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		
40 CFR Part 63 Subpart BBBBBB National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities Storage Tank Emission Reduction Partnership Program (STERPP) agreement executed March 31, 2001		
Internal Floating Roof Tank with a Storage Capacity Greater than 75 cubic meters, Constructed after July 23, 1984		
EQ Reference #	Description	Manufacturer/Model #
EP-06	Tank #3212: 3.310 Million Gallon Internal Floating Roof Tank	Unknown (1997)

Emission/Operational Limitations:

- 1) The permittee shall control emissions from EP-06 gasoline storage vessel (Tank #3212) in accordance with the most stringent applicable provisions of 40 CFR Part 60 Subpart Kb and 40 CFR Part 63 Subpart BBBBBB.
- 2) Storage Tanks that are subject to, and comply with, the control requirements of 40 CFR Part 60 Subpart Kb, will be deemed to be in compliance with 40 CFR Part 63 Subpart BBBBBB.
- 3) The permittee shall not store any volatile organic liquid with a true vapor pressure of greater than 11.1 psi (76.6 kPa) in EP-06 (Tank #3212) unless a closed vent system and control system (§60.112b(a)(3)) or equivalent (§60.112b(a)(4)) is installed. [§60.112b(b)]

Equipment/Procedural Requirements:

Internal Floating Roof, 40 CFR 60.112b(a)(1):

- 1) The permittee shall ensure that the EP-06 internal floating roof gasoline storage tank meets the applicable requirements of §60.112b(a)(1). The tank shall meet the following specifications for a fixed roof in combination with an internal floating roof: [§60.112b(a)(1)]
 - a) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. [§60.112b(a)(1)(i)]
 - b) The internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: [§60.112b(a)(1)(ii)]
 - i) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid

- between the wall of the storage vessel and the floating roof continuously around the circumference of the tank. [§60.112b(a)(1)(ii)(A)]
- ii) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous. [§60.112b(a)(1)(ii)(B)]
 - iii) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof. [§60.112b(a)(1)(ii)(C)]
- c) 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)]
 - d) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e. no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [§60.112b(a)(1)(iv)]
 - e) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [§60.112b(a)(1)(v)]
 - f) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [§60.112b(a)(1)(vi)]
 - g) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [§60.112b(a)(1)(vii)],
 - h) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. [§60.112b(a)(1)(viii)]
 - i) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [§60.112b(a)(1)(ix)]

STERPP Agreement Executed March 31, 2001: (Attachment H)

- 2) The permittee shall ensure that the slotted guidepole controls meet the following additional requirements:
 - a) The sliding cover shall be in place over the slotted-guidepole opening through the floating roof at all times except when the sliding cover must be removed for access.
 - b) If the control technology used includes a guidepole float, the float shall be floating within the guidepole at all times except when it must be removed for access to the stored liquid or when the tank is empty.

Monitoring/Recordkeeping:

Internal Floating Roof, §60.113b(a) and §60.115b(a)(2):

- 1) The permittee shall perform the following inspections as described in §60.113b(a) for the EP-06 (Tank #3212) tank that is equipped with a fixed roof in combination with an internal floating roof: [§60.113b(a)]

- a) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with gasoline. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage vessel. [§60.113b(a)(1)]
- b) For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the gasoline inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Missouri Department of Natural Resources, Air Pollution Control Program in the inspection report required in §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. [§60.113b(a)(2)]
- c) For vessels equipped with a double-seal system as specified in §60.112b(a)(1)(ii)(B): [§60.113b(a)(3)]
 - i) Visually inspect the vessel as specified in §60.113b(a)(4), at least every 5 years; or [§60.113b(a)(3)(i)]
 - ii) Visually inspect the vessel as specified in §60.113b(a)(2). [§60.113b(a)(3)(ii)]
- d) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in §60.113b(a)(2). [§60.113b(a)(4)]
- e) The permittee shall notify the Missouri Department of Natural Resources, Air Pollution Control Program in writing at least 30 days prior to the filling or refilling of any storage vessel for which an inspection is required by §60.113b(a)(1) and (a)(4), to afford the Department of Natural Resources the opportunity to have an observer present. If the inspection required by §60.113b(a)(4), is not planned and the permittee could not have known about the inspection 30 days in advance or refilling the tank, the permittee shall notify the Missouri Department of Natural Resources, Air Pollution Control Program at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Missouri Department of Natural Resources, Air Pollution Control Program at least 7 days prior to the refilling. [§60.113b(a)(5)]
- f) The permittee shall keep a record of each inspection performed as required in §60.113b(a)(1) through (a)(4). Each record shall identify the storage vessel on which the inspection was

performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment including seals, internal floating roof, and fittings. These records shall be maintained onsite for a minimum of five years. [§60.115b(a)(2)]

STERPP Agreement Executed March 31, 2001: (Attachment H)

- 2) The permittee shall conduct the following additional inspections with respect to the slotted guidepole controls:
 - a) Visually inspect the deck fitting for the slotted guidepole each time the vessel is emptied and degassed. If the slotted guidepole deck fitting or control devices have defects, or if a gap of more than 0.32 centimeters ($\frac{1}{8}$ inch) exists between any gasket required for control of the slotted guidepole deck fitting and any surface that it is intended to seal, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years.
 - b) The permittee shall keep a record of each inspection performed. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment. These records shall be maintained onsite for a minimum of five years or as necessary to demonstrate compliance with this permit condition, whichever is longer.

General, §60.116b and §63.11094(a):

- 3) The permittee shall keep readily accessible records showing the storage vessel dimension and an analysis showing the capacity of the EP-06 (Tank #3212) storage vessel. These records shall be maintained onsite for the life of the tank or a minimum of five years, whichever is longer. [§60.116b(b)]
- 4) The permittee shall maintain records of the petroleum liquid(s) stored in EP-06 (Tanks #3212) using the log shown in Attachment D-1 or an equivalent created by the permittee. These records shall be maintained onsite for a minimum of five years and shall contain at least the following information:
 - a) The name of each petroleum liquid stored;
 - b) The period that each petroleum liquid was stored in the tank; and
 - c) The maximum true vapor pressure of that petroleum liquid during the respective storage period. Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined according to §60.116b(c).
- 5) The permittee shall maintain all records onsite for a minimum of five years unless a longer period is specified with the requirement.
- 6) The permittee shall immediately make any record available for inspection to Missouri Department of Natural Resources personnel upon request.

Reporting:

Notifications required by §63.11093 and §63.9 for 40 CFR Part 63, Subpart BBBBBB:

- 1) The permittee shall submit the following notifications to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 as applicable for the EP-06 internal floating roof tank:
 - a) The permittee shall submit a Notification of Compliance Status as specified in §63.9(h). The Notification of Compliance Status must state which of the compliance options referenced in Table 1 to Subpart BBBBBB is used to comply with the subpart. The Notification of Compliance Status must be sent before the close of business on the 60th day following the

- completion of the relevant compliance demonstration activity specified in the relevant standard (unless a different reporting period is specified in the standard, in which case the letter must be sent before the close of business on the day the report of the relevant testing or monitoring results is required to be delivered or postmarked). [§63.11093(b)]
- b) The permittee shall submit a written Notification of Performance Test as specified in §69.9(e) prior to initiating testing intended to demonstrate compliance with the compliance option selected. The Notification must be submitted at least 60 calendar days before the performance test is scheduled to begin to allow the Missouri Department of Natural Resources, Air Pollution Control Program to review and approve the site-specific test plan required under §63.7(c), if requested by the Department of Natural Resources, and to have an observer present during the test. [§63.11093(c)]
 - c) The permittee shall submit additional notifications specified in §63.9, as applicable. [§63.11093(d)]

Reports required for Internal Floating Roof Tanks by §60.115b(a) and §63.11095(a)(1):

- 2) The permittee shall submit the following reports to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 as applicable for the EP-06 internal floating roof tank:
 - a) 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 vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). [§60.115b(a)(2)]
 - b) If any of the conditions described in §60.113b(a)(2), are detected during the annual visual inspection required, the permittee shall submit a report to the Air Pollution Control Program within 30 days of the inspection. The report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made. [§60.115b(a)(3)]
 - c) 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, the permittee shall submit a report to Air Pollution Control Program within 30 days of the inspection. The report shall identify the storage vessel, the reason it did not meet the applicable specifications, and list each repair made. [§60.115b(a)(4)]

STERPP Agreement Executed March 31, 2001: (Attachment H)

- 3) After each inspection required by the STERPP Agreement Executed March 31, 2001, that finds any defects or other problems with the slotted guidepole controls, the permittee shall submit a report to Air Pollution Control Program within 30 days of the inspection. The report shall identify the storage vessel, the reason it did not meet the applicable specifications, and list each repair made.

General, All:

- 4) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

PERMIT CONDITION 2		
10 CSR 10-6.060 Construction Permits Required Construction Permit 1195-004A, Issued April 1996		
8-Arm Two Bay Submerged Loading Truck Rack		
EIO Reference #	Description	Manufacturer/Model #
EP-07	Two Bay, eight-arm Tank Truck Loading Rack	Unknown (1995)
Control Device	Vapor Collection and Destruction Unit (Enclosed Flare)	Josh Zink/ Model ZCT2-6-35-2-2/6-XX (1995)

Emission/Operational Limitations:

- 1) The permittee shall operate the vapor collection and destruction unit (VDU) at all times that EP-07 is dispensing petroleum products. [Special Condition 6.]
- 2) The VDU shall be operated and maintained in accordance with the manufacturer's specifications and good engineering practices. [Special Condition 6.]

Monitoring/Recordkeeping:

- 1) The permittee shall maintain an operating and maintenance log for the VDU which records the following: [Special Condition 6]
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and [Special Condition 6A]
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements or additions of components. [Special Condition 6B]
- 2) Attachment C contains a log satisfying these recordkeeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 3) The permittee shall maintain all records onsite for a minimum of five years.
- 4) The permittee shall immediately make all records available for inspection to Missouri Department of Natural Resources personnel upon request.

Reporting:

- 1) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

PERMIT CONDITION 3

40 CFR Part 60 Subpart XX Standards of Performance for Bulk Gasoline Terminals
 40 CFR Part 63 Subpart BBBB National Emission Standards for Hazardous Air Pollutants for
 Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities
 40 CFR Part 64 Compliance Assurance Monitoring

8-Arm Two Bay Submerged Loading Truck Rack

EQ Reference #	Description	Manufacturer/Model #
EP-07	Two Bay, eight-arm Tank Truck Loading Rack	Unknown (1995)
Control Device	Vapor Collection and Destruction Unit (VDU) (Note the VDU is also referred to as the: Enclosed Ground Flare, Thermal Oxidation System, or Vapor Combustion Unit (VCU))	Josh Zink/ Model ZCT2-6-35-2-2/6-XX (1995)

Emissions Limitations:

- 1) Emissions to the atmosphere from the vapor collection and destruction unit (VDU) due to the loading of liquid product into gasoline cargo tank trucks shall not exceed 35 milligrams of total organic compounds per liter of gasoline loaded. [§60.502(b)]
- 2) The permittee shall ensure that the EP-07 gasoline loading rack complies with the most stringent applicable provisions of both 40 CFR Part 60, Subpart XX and CFR Part 63, Subpart BBBB.

Operational/Procedural Requirements:

Loading of Gasoline Cargo Tanks, §63.11088(a) and (b), §63.11092(f) and §60.502:

- 1) The permittee shall not allow gasoline cargo tank trucks to be filled with liquid product using the EP-07 loading rack unless the cargo tank trucks are equipped with vapor collection equipment that is compatible with the installation's vapor collection system. [§60.502(f)]
- 2) The permittee shall ensure that the terminal's and the tank truck's vapor collection systems are connected any time that liquid product is loaded into a gasoline cargo tank truck. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the loading racks. [§60.502(g)]
- 3) The permittee shall ensure that EP-07 loading rack transfers liquid product only into vapor-tight gasoline cargo tanks. The following procedures should be observed: [§60.502(e)]
 - a) The permittee shall obtain the vapor tightness documentation described in §60.505(b) and §63.11094(b) for each gasoline cargo tank which is to be loaded using EP-06 loading racks. This documentation shall be updated at least once per year, to reflect the most current test results, and shall include, as a minimum, the following information: [§60.502(e)(1) and §60.505(b)]
 - i) Name of test: Gasoline Delivery Tank Pressure Test-EPA Reference Method 27 or periodic railcar bubble leak testing. [§60.505(b)(1)]
 - ii) Cargo tank owner's name and address. [§60.505(b)(2)]
 - iii) Cargo tank identification number. [§60.505(b)(3)]
 - iv) Testing location. [§60.505(b)(4)]
 - v) Date of test. [§60.505(b)(5)]
 - vi) Tester name and signature. [§60.505(b)(6)]
 - vii) Witnessing inspector, if any. Name, signature, and affiliation. [§60.505(b)(7)]
 - viii) Vapor tightness repair: Nature of repair work and when performed in relation to vapor tightness testing.

- ix) Test results: test pressure; pressure or vacuum change, mm of water; time period of test; number of leaks found with instrument; and leak definition. [§60.505(b)(8)]
- b) The permittee shall require the tank identification number to be recorded as each gasoline cargo tank is loaded using EP-07 loading rack. [§60.502(e)(2)]
- c) The permittee shall cross-check each tank identification number obtained in §60.502(e)(2) above with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is applicable: [§60.502(e)(3)(i)]
 - i) If less than an average of one gasoline cargo tank per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or [§60.502(e)(3)(i)(A)]
 - ii) If less than an average of one gasoline cargo tank per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually. [§60.502(e)(3)(i)(B)]
- d) If either the quarterly or semiannual cross-check reveals that these conditions were not maintained, the source must return to biweekly monitoring until such time as these conditions are again met. [§60.502(e)(3)(ii)]
- e) In the event that a cross-check identifies that a gasoline cargo tank was loaded without the appropriate vapor tightness documentation, the permittee shall:
 - i) Notify the owner or operator of each non-vapor-tight gasoline cargo tank loaded by EP-06 loading racks within 1 week of the completion of the documentation cross-check. [§60.502(e)(4)]
 - ii) Take appropriate steps to ensure that the non-vapor-tight gasoline cargo tank will not be reloaded by EP-07 loading rack until vapor tightness documentation for that gasoline cargo tank is obtained. [§60.502(e)(5)]
- f) Alternate procedures to those described in §60.502(e)(1) through (5) for limiting gasoline cargo tank loadings may be used upon application to and approval by the Director. [§60.502(e)(6)]
- 4) The permittee shall ensure that vapor collection system is designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack. [40 CFR Part 63 Subpart BBBBBB Table 2 1.(c)]
- 5) The permittee shall ensure that the vapor collection system is operated according to the following requirements:
 - a) The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in §60.503(d). [§60.502(h)]
 - b) No pressure-vacuum vent in the vapor collection system for EP-07 shall begin to open at a system pressure less than 4,500 pascals (450 mm of water). [§60.502(i)]

Operation of the VDU, §63.11092(b) and (d):

- 6) The permittee shall determine an operating parameter value for the VDU using one of the following methods:
 - a) If the permittee elects to conduct a new performance test according to the requirements of §63.11092(a)(1), the permittee shall:
 - i) Select an operating parameter based on the parameter data monitored during the most recent performance test, supplemented by engineering assessments and the manufacturer's recommendations. [§63.11092(b)(3)]

- ii) The permittee shall provide for the Director's approval the rationale for the selected operating parameter value, monitoring frequency, and averaging time, including data and calculations used to develop the value and a description of why the value, monitoring frequency, and averaging time demonstrate continuous compliance with the emission standard in listed in §60.502(b). [§63.11092(b)(4)]
- b) If the permittee elects to comply with the performance testing alternatives listed in §63.11092(a)(2) or (3), the permittee shall: [§63.11092(b)(5)]
 - i) Monitor an operating parameter that has been approved by the Director and is specified in the installation's current enforceable operating permit. [§63.11092(b)(5)(i)]
 - ii) Determine an operating parameter value based on engineering assessment and the manufacturer's recommendation and provide for the Director's approval the rationale for the selected operating parameter value, monitoring frequency, and averaging time, including data and calculations used to develop the value and a description of why the value, monitoring frequency, and averaging time demonstrate continuous compliance with the emission standard in listed in §60.502(b). [§63.11092(b)(5)(ii)]
 - iii) At the time that the Director requires a new performance test, the permittee must determine the monitored operating parameter value according to the requirements specified in §63.11092(b). [§63.11092(b)(5)(i)]
- 7) The permittee shall operate the vapor processing system in a manner not to exceed or not to go below, as appropriate, the operating parameter value for the parameters determined as described in §63.11092(b)(1). [§63.11092(d)(1)]
 - a) Operation of the vapor processing system in a manner exceeding or going below the operating parameter value, as appropriate, shall constitute a violation of the emission standard listed in §63.11088(a), except as specified in §63.11092(d)(4). [§63.11092(d)(3)]
 - b) Malfunctions that are discovered during monitoring and inspections conducted as required by the monitoring and inspection plan described in paragraphs §63.11092(b)(1)(i)(B)(2) and (iii)(B)(2), below, shall not constitute a violation of the emission standard listed in §63.11088(a) if corrective actions as described in the monitoring and inspection plan are followed. The permittee must: [§63.11092(d)(4)]
 - i) Initiate corrective action to determine the cause of the problem within 1 hour; [§63.11092(d)(4)(i)]
 - ii) Initiate corrective action to fix the problem within 24 hours; [§63.11092(d)(4)(ii)]
 - iii) Complete all corrective actions needed to fix the problem as soon as practicable consistent with good air pollution control practices for minimizing emissions; [§63.11092(d)(4)(iii)]
 - iv) Minimize periods of start-up, shutdown, or malfunction; and [§63.11092(d)(4)(iv)]
 - v) Take any necessary corrective actions to restore normal operation and prevent the recurrence of the cause of the problem. [§63.11092(d)(4)(v)]

Operation and Maintenance Requirements, §63.6(e)(1):

- 8) The permittee shall comply with the applicable provisions of §63.6(e)(1), including:
 - a) At all times, including periods of startup, shutdown, and malfunction, the permittee must operate and maintain the EP-07 loading rack, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. [§63.6(e)(1)(i)]
 - b) Malfunctions must be corrected as soon as practicable after their occurrence. To the extent that an unexpected event arises during a startup, shutdown, or malfunction, the permittee must

comply by minimizing emissions during such a startup, shutdown, and malfunction event consistent with safety and good air pollution control practices. [§63.6(e)(1)(ii)]

Monitoring:

Note:

Compliance Assurance Monitoring (CAM) applies to these units, so this permit condition incorporates parts of 40 CFR Part 64 and, through that, parts of 40 CFR Part 60. Where conflicts arise between these documents and 40 CFR Part 60, the approved conditions of the CAM plan and CAM test plan (included in this permit condition) govern. A copy of the CAM plan as submitted by the permittee is included with this permit as Attachment G.

- 1) Monitoring Requirements for the loading rack and VCU:
 - a) The permittee shall take timely corrective action during periods of excursions where any of the indicators performance is out of the operational range. A corrective action includes an investigation of the reason for the excursion, evaluation of the problem that led to the excursion and necessary follow-up action to return the emission unit to within the indicator and operational range. An excursion is determined by the average discreet data point over a period of time. An excursion does not indicate a violation of an applicable requirement.
 - b) The monitoring requirements for this unit shall be as specified in Table 1: Sinclair Transportation Company – Carrollton Products Terminal – APCP Id. No. 033-001 Vapor Combustion Unit (VCU) Controlling Emissions by Vapor Collection System on a Two-Bay Product Loading Rack.
 - c) An excursion and its associated averaging time for each emission unit shall be as specified in Table 1: Sinclair Transportation Company – Carrollton Products Terminal – APCP Id. No. 033-001 Vapor Combustion Unit (VCU) Controlling Emissions by Vapor Collection System on a Two-Bay Product Loading Rack.
 - d) The permittee shall conduct monitoring continuously except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities, in accordance with §64.7(c). Although compliance with the emission limitation may be exempted in some circumstances during conditions such as startup, shutdown, and malfunction, Sinclair Transportation Company – Carrollton Products Terminal is required to operate and maintain the source in accordance with good air pollution control practices for minimizing emissions during such periods. This requires Sinclair Transportation Company – Carrollton Products Terminal to minimize periods of startup, shutdown or malfunction, and take corrective action to restore normal operation and prevent recurrence of the problem that led to the excursion except where the excursion was related to an excused startup, shutdown, or malfunction.
 - e) The permittee shall follow the following procedure in response to excursions or exceedances.
 - i) Upon detecting an excursion or exceedance, the permittee shall restore operation of the unit to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action, or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable

emission limitation or standard, as applicable.

[\$64.7(d)(1)]

- ii) Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[\$64.7(d)(2)]

Table 1: Sinclair Transportation Company – Carrollton Products Terminal - APCP Id. No. 033-0001 Vapor Combustion Unit (VCU) Controlling Emissions by Vapor Collection System on a Two-Bay Product Loading Rack						
Indicator	VCU Pilot Flame	Leak Detection and Repair (LDAR) of Vapor Collection System	Operation of Assist Air Blower	Operation of Vapor Line Valve	Tanker Truck Vapor Tightness	Comprehensive VCU Inspection
Measurement Approach	Fire Eye/Thermocouple Flame Sensor	Sight, sound, and smell leak inspections of liquid and vapor piping components associated with the loading rack.	VCU Programmable Logic Controller (PLC) system start-up check	Pressure Sensor/Transmitter	Tanker Truck Vapor Tightness Testing performed annually by tanker truck owner/operator.	Routine cleaning, adjustment, and repair of the VCU system in accordance with John Zink recommendations.
Indicator Range	Presence of a pilot flame.	No leaks in the Vapor Collection System.	Blower running.	Less than 17.5 inches of water column.	Tanker truck driver's presentation of valid tightness testing certification.	Inspections performed semiannually. A John Zink-qualified technician must be present during at least one semiannual inspection per year.
Excursion	Absence of a pilot flame.	A leak in the Vapor Collection System.	Blower not running.	Equal to or greater than 17.5 inches of water column.	Failure to present a valid tightness testing certification.	Failure to perform inspections in accordance with that specified in the indicator range.

	All excursions trigger an inspection, corrective action, and a reporting requirement.					
Quality Improvement Plan (QIP) Threshold	The Permittee shall submit a QIP to the Missouri Department of Natural Resources, Air Pollution Control Program, Compliance/Enforcement Section if any indicator experiences five (5) excursions, as defined herein, in a 6-month reporting period. The QIP shall be submitted along with the Semiannual Monitoring Report required in the Reporting section of this table below. Additionally, the Permittee shall conduct a full performance test within one (1) year of the issuance of this Part 70 Permit, and every five (5) years thereafter for the life of this Part 70 Permit unless the Permit has been legally modified, to demonstrate compliance with 40 CFR Part 60, Subpart XX, <i>Standards of Performance for Bulk Gasoline Terminals</i> .					
Data Representativeness	The flame sensor is located within the VCU to view the pilot flame as designed by the manufacturer, John Zink.	The piping components at the loading rack, vapor collection system, and VCU must have integrity to prevent leaks.	The PLC on the VCU is hard programmed to validate the operation of the blower prior to authorizing loading.	Pressure is monitored within the vapor line. If pressure equals or exceeds 17.5 inches of water column, PLC shall initiate an automatic shutdown.	All tanker trucks loaded shall be properly tested in accordance with 40 CFR Part 60, Subpart XX.	Inspection and maintenance of the VCU system helps to ensure proper ongoing operation.
Verification of Operational Status	The pilot flame system, as well as the flame sensing system, will be inspected and maintained per manufacturer's recommendations.	Timely inspections.	The proper functioning of the blower will be determined during scheduled maintenance per manufacturer's recommendations.	Inspection of the vapor valve and controls in accordance with manufacturer's recommendations.	NA	NA
QA/QC Practices and Criteria	Semiannual inspection of VCU.	Monthly inspection of the vapor collection system. Any and all leaks shall be repaired	Semiannual inspection of VCU.	Semiannual inspection of VCU.	Each time driver requests loading, the validity of the testing certification is checked (i.e., is current	NA

		within fifteen (15) days.			certification on file?). If no longer valid, the truck will not be allowed to load.	
Monitoring Frequency	Continuous while receiving loading request from loading rack Terminal Management System (TMS) computer.	Monthly.	Each time a request to load is received from the TMS computer.	Continuous while receiving loading request from loading rack TMS computer.	Annual retesting and submittal of valid test certifications.	Semiannually by Permittee's operations personnel and annually with a John Zink-qualified technician present.
Data Collection Procedure	All excursions shall be logged by operations personnel.	Sight, sound and smell, and leaks, shall be logged by operations personnel.	Any faults/failures shall be logged by operations personnel.	All excursions shall be logged by operations personnel.	Loading Rack TMS computer system	Results of inspections and repairs shall be logged by operations personnel.
Averaging Period	None/NA	None/NA	None/NA	None/NA	None/NA	None/NA
Reporting	The Permittee shall submit monitoring reports in accordance with 40 CFR Part 64, § 64.9, especially noting the number, duration, and cause for any and all excursions, exceedances, and monitor downtime. The reports shall be submitted on a semiannual basis, along with or as a part of, the installation's Semiannual Monitoring Report submitted in accordance with 10 CSR 10-6.065, <i>Operating Permits</i> .					

Performance Testing, §63.11092 and §60.503:

- 1) The permittee shall demonstrate that the vapor processing and collection system meets the emission limitation specified in §60.502(b) using one of the following methods:
 - a) Conduct a performance test on the vapor processing and collection systems according to one of the following procedures: [§63.11092(a)(1)]
 - i) Use the test methods and procedures in §60.503, except a reading of 500 ppm shall be used to determine the level of leaks to be repaired under §60.503(b), or [§63.11092(a)(1)(i)]
 - ii) Use alternative test methods and procedures in accordance with the alternative test method requirements in §63.7(f). [§63.11092(a)(1)(ii)]
 - b) If the permittee is operating the gasoline loading rack in compliance with an enforceable State, local, or tribal rule or permit that requires the loading rack to meet an emission limit of 80 milligrams per liter of gasoline loaded or less, the permittee may submit a statement by a responsible official of the facility certifying the compliance status of the loading rack in lieu of an additional test to demonstrate compliance with the emission limit of 40 CFR Part 63 Subpart BBBBBB as described in §63.11092(a)(1). [§63.11092(a)(2)]
 - c) If the permittee has conducted performance testing on the vapor processing and collection systems within 5 years prior to January 10, 2008, and the test is for the affected facility and is representative of current or anticipated operating processes and conditions, the permittee may submit the results of such testing in lieu of the test required to demonstrate compliance with the emission limit of 40 CFR Part 63 Subpart BBBBBB as described in §63.11092(a)(1), provided the testing was conducted using the test methods and procedures in §60.503. If the Director determines that the prior test data is unacceptable, the facility is still required to meet the requirement to conduct an initial performance test within 180 days of the compliance date specified in §63.11083. [§63.11092(a)(3)]
- 2) For each performance test conducted under §63.11092(a)(1), the permittee shall determine an operating parameter value for the vapor processing system using the methods listed in §63.11092(b)(1) and ensure that this parameter is continuously monitored as a part of the performance test.
- 3) Performance tests conducted after the initial test on the VDU shall meet the requirements of §63.11092(a)(1). For performance tests performed after the initial test, the permittee shall document the reasons for any change in the operating parameter value since the previous performance test. [§63.11092(c)]
- 4) The permittee shall maintain a record of the most recent performance test completed according to the provisions of §60.503(d) to document compliance with the maximum gauge pressure limitation in §60.502(i) or (j).

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

- 5) The permittee shall install, calibrate, certify, operate, and maintain, according to the manufacturer's specifications, a continuous monitoring system (CMS) while gasoline vapors are displaced to the vapor processor system as specified in §63.11092(b)(1)(iii)(A) or (B): [§63.11092(b)(1)(iii)]
 - a) Where a thermal oxidation system other than a flare is used, a continuous parameter monitoring system (CPMS) capable of measuring temperature must be installed in the firebox or in the ductwork immediately downstream from the firebox in a position before any substantial heat exchange occurs. [§63.11092(b)(1)(iii)(A)]
 - b) As an alternative to the CPMS capable of measuring temperature described in §63.11092(a)(1), the permittee may choose to meet the requirements described below: [§63.11092(b)(1)(iii)(B)]

- i) The presence of a thermal oxidation system pilot flame shall be monitored using a heat-sensing device, such as an ultraviolet beam sensor or a thermocouple, installed in proximity to the pilot light to indicate the presence of a flame. [§63.11092(b)(1)(iii)(B)(I)]
- ii) Develop and submit to the Director a monitoring and inspection plan that describes the permittee's approach for meeting the requirements described below:
[§63.11092(b)(1)(iii)(B)(2)]
 - (1) The thermal oxidation system shall be equipped to automatically prevent gasoline loading operations from beginning at any time that the pilot flame is absent.
[§63.11092(b)(1)(iii)(B)(2)(i)]
 - (2) The permittee shall verify, during each day of operation of the loading rack, the proper operation of the assist-air blower, the vapor line valve, and the emergency shutdown system. Verification shall be through visual observation or through an automated alarm or shutdown system that monitors and records system operation.
[§63.11092(b)(1)(iii)(B)(2)(ii)]
 - (3) The permittee shall perform semi-annual preventive maintenance inspections of the thermal oxidation system according to the recommendations of the manufacturer of the system. [§63.11092(b)(1)(iii)(B)(2)(iii)]
 - (4) The monitoring plan developed under §63.11092(b)(1)(iii)(B)(2) shall specify conditions that would be considered malfunctions of the thermal oxidation system during the inspections or automated monitoring performed under §63.11092(b)(1)(iii)(B)(2)(ii) and (iii) describe specific corrective actions that will be taken to correct any malfunction, and define what the permittee would consider to be a timely repair for each potential malfunction. [§63.11092(b)(1)(iii)(B)(2)(iv)]
 - (5) The permittee shall document any system malfunction, as defined in the monitoring and inspection plan, and any activation of the automated alarm or shutdown system with a written entry into a log book or other permanent form of record. Such record shall also include a description of the corrective action taken and whether such corrective actions were taken in a timely manner, as defined in the monitoring and inspection plan, as well as an estimate of the amount of gasoline loaded during the period of the malfunction.
[§63.11092(b)(1)(iii)(B)(2)(v)]
- c) Monitoring an alternative operating parameter or a parameter of a vapor processing system other than those listed in §63.11092(b)(1)(iii)(B)(1) or (2), will be allowed upon demonstrating to the Director's satisfaction that the alternative parameter demonstrates continuous compliance with the emission limitation of 35 milligrams of total organic compounds per liter of gasoline loaded.
[§63.11092(b)(1)(iv)]
- 6) The permittee shall maintain and operate the continuous monitoring system (CMS) according to any additional applicable requirements of §63.8.

Recordkeeping:

Cargo Tank Vapor Tightness Testing, §63.11094(b), §63.11094(c), and §60.505:

- 1) The permittee shall maintain the tank truck vapor tightness documentation required by §60.502(e)(1) on file at the installation in a permanent form available for inspection. [§60.505(a)]
- 2) As an alternative to keeping records at the installation of each gasoline cargo tank test result, the permittee may comply with the requirements in either (a) or (b) below:
 - a) The permittee shall maintain an electronic copy of each record that is instantly available at the terminal. The copy of each record must be an exact duplicate image of the original paper record

- with certifying signatures and the Director must be notified in writing that the installation using this method to maintain compliance. [§60.505(e)(1)(i) and (ii)]
- b) If the installation uses a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g. via a card lock-out system), a copy of the documentation must be made available (e.g., via facsimile) for inspection by Missouri Department of Natural Resources personnel during the course of a site visit, or within a mutually agreeable time frame. The copy of each record must be an exact duplicate image of the original paper record with certifying signatures and the Director must be notified in writing that the installation using this method to maintain compliance. [§60.505(e)(2)(i) and (ii)]
 - 3) The permittee shall keep documentation of any notifications required when a cross-check identifies that a gasoline cargo tank was loaded without the appropriate vapor tightness documentation.

Continuous Monitoring System, §63.11094(f) and §63.10:

- 4) The permittee shall maintain the up-to-date and readily available records of the following items associated with the continuous parameter monitoring system:
 - a) The continuous monitoring data required in §63.11092(b) or (e). This record shall indicate the time intervals during which loadings of gasoline cargo tanks have occurred or, alternatively, shall record the operating parameter data only during such loadings. [§63.11094(f)(1)]
 - b) The monitoring and inspection plan described in §63.11092(b)(1)(i)(B)(2) or (iii)(B)(2). [§63.11094(f)(3)]
 - c) A record of all system malfunctions, as specified in §63.11092(b)(1)(i)(B)(2)(v) or (iii)(B)(2)(v). [§63.11094(f)(4)]
- 5) The permittee shall maintain a record of all data and calculations, engineering assessments, and manufacturer's recommendations used in determining the operating parameter value. These records shall be maintained on file for a minimum of 5 years, or until a new performance test is conducted and approved by the Director, whichever is longer.
- 6) If the permittee requests approval to use a vapor processing system or monitor an operating parameter other than those specified in §63.11092(b), the permittee shall submit a description of planned reporting and recordkeeping procedures to the Missouri Department of Natural Resources, Air Pollution Control Program. The Director will specify appropriate reporting and recordkeeping requirements as part of the review of the permit application.
- 7) The permittee shall maintain records of any performance tests on file for a minimum of 5 years or until another performance test is performed, whichever is longer.
- 8) The permittee shall maintain any additional records specified by §63.10(b).

General:

- 9) As required by §63.10(b)(2)(iii), the permittee shall maintain records of all required maintenance performed on the EP-07 loading rack, air pollution control and monitoring equipment. Attachment C contains a log satisfying these recordkeeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 10) As required by §60.505(f), the permittee shall keep records of all replacements or additions of components performed on the existing vapor processing system.
- 11) The permittee shall maintain all records onsite for a minimum of five years unless a longer period is specified with the requirement.
- 12) The permittee shall immediately make any records available to Missouri Department of Natural Resources personnel upon request.

Reporting:

Notifications required by §63.11093 and §63.9 for 40 CFR Part 63, Subpart BBBBBB:

- 1) The permittee shall submit the following notifications to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 as applicable for the EP-07 loading rack:
 - a) The permittee shall submit an initial notification as specified in §63.9(b) to the Air Pollution Control Program which indicates that the installation is subject to 40 CFR Part 63 Subpart BBBBBB. For existing loading racks the initial notification is due by May 9, 2008.
 - b) The permittee shall submit a Notification of Compliance Status as specified in §63.9(h). The permittee shall report simultaneously with the Notification of Compliance Status all data and calculations, engineering assessments, and manufacturer's recommendations used in determining the operating parameter value as described in **Operational/Procedural Requirements, paragraph [6)a) or 6)b)2.]**, above. The Notification of Compliance Status must be sent before the close of business on the 60th day following the completion of the relevant compliance demonstration activity specified in the relevant standard (unless a different reporting period is specified in the standard, in which case the letter must be sent before the close of business on the day the report of the relevant testing or monitoring results is required to be delivered or postmarked).
 - c) The permittee shall submit a written Notification of Performance Test as specified in §69.9(e) prior to initiating testing intended to demonstrate compliance with the compliance option selected. The Notification must be submitted at least 60 calendar days before the performance test is scheduled to begin to allow the Missouri Department of Natural Resources, Air Pollution Control Program to review and approve the site-specific test plan required under §63.7(c), if requested by the Department of Natural Resources, and to have an observer present during the test.
 - d) The permittee shall submit additional notifications specified in §63.9, as applicable.

Reports required for Loading Racks by §60.505 and §63.11095(a)(2) and (b)(1)-(4):

- 2) The permittee shall submit an excess emissions report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 at the time the semiannual compliance report is submitted. The following occurrences are excess emissions events, and the following information shall be included in the excess emissions report, as applicable:
 - a) Each exceedance or failure to maintain, as appropriate, the monitored operating parameter value determined in **Operational/Procedural Requirements, paragraph [6)a) or 6)b)]**, above. 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.
 - b) Each instance in which malfunctions discovered during monitoring and inspections conducted as required by the Monitoring and Inspection Plan described in **Monitoring, paragraph [5)b)2.]**, above, were not resolved according to the necessary corrective actions described in **Operational/Procedural Requirements, paragraph [7)b)]**, above. The report shall include a description of the malfunction and the timing of the steps taken to correct the malfunction.
 - c) Each instance of a nonvapor-tight gasoline cargo tank loading at the installation in which the permittee failed to take steps to assure that such cargo tank would not be reloaded at the facility before vapor tightness documentation for that cargo tank was obtained.
 - d) Each reloading of a nonvapor-tight gasoline cargo tank at the installation before the permittee has obtained vapor tightness documentation for that cargo tank in accordance with the procedures described in **Operational/Procedural Requirements, paragraph [3)d)2.]**, above.

General, All:

- 3) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.
- 4) The permittee shall comply with any additional applicable reporting requirements of §63.10.

PERMIT CONDITION 4		
10 CSR 10-6. 220 Restriction of Emission of Visible Air Contaminants		
8-Arm Two Bay Submerged Loading Truck Rack		
EIQ Reference #	Description	Manufacturer/Model #
EP-07	Two Bay, eight-arm Tank Truck Loading Rack	Unknown (1995)
Control Device	Vapor Collection and Destruction Unit (Enclosed Flare)	Josh Zink/ Model ZCT2-6-35-2-2/6-XX (1995)

Emission Limitations:

- 1) The permittee shall not cause or permit emissions to be discharged into the atmosphere from the VCU any visible emissions with an opacity greater than 20%.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

- 1) The permittee shall conduct opacity readings on the VCU for EP-07 using the procedures listed in the Core Permit Requirements for this rule.
- 2) The permittee shall maintain the monitoring schedule listed in the Core Permit Requirements for conducting these observations.

Recordkeeping:

- 1) The permittee shall maintain records of all opacity observations as described in the Core Permit Requirements for this rule using Attachments A and B, or equivalent forms created by the permittee.
- 2) The permittee shall maintain records of any equipment malfunctions as described in the Core Permit Requirements for this rule using Attachment C or an equivalent form created by the permittee.
- 3) The permittee shall maintain all records on site for the most recent 5 years.
- 4) The permittee shall immediately make these records available to any Department of Natural Resources personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determines, using the Method 9 test, that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

PERMIT CONDITION 5		
40 CFR Part 63 Subpart BBBBBB National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities		
External Floating Roof Petroleum Storage Tanks with a Storage Capacity greater than or equal to 75 cubic meters, Constructed prior to June 11, 1973		
EIQ Reference #	Description	Manufacturer/Model #
EP-01	Tank #3201: 3.360 Million Gallon External Floating Roof Tank	Unknown (Prior to 1950)
EP-04	Tank #3204: 2.310 Million Gallon External Floating Roof Tank	Unknown (Prior to 1950)

Equipment/Procedural Requirements:

External Floating Roof, §63.11087 and §63.1063(a) & (b):

- 1) The permittee shall equip and operate each external floating roof gasoline storage tank according to the applicable requirements of §63.1063(a)(1) and (b), except that if the storage tank does not currently meet the requirements of §63.1063(a)(1), the tank shall instead be equipped and operated according to the applicable requirements of §63.1063(a)(2). Each designated tank shall meet the following specifications for an external floating roof: [Table 1 of Part 63 Subpart BBBBBB, Item 2.(d)]
 - a) Equip each external floating roof tank (EFR) with one of the following rim seal configurations.
 - [§63.1063(a)(1)(ii)]
 - i) A liquid-mounted seal and a secondary seal. [§63.1063(a)(1)(ii)(A)]
 - ii) A mechanical shoe seal and a secondary seal. The upper end of the shoe(s) shall extend a minimum of 61 centimeters (24 inches) above the stored liquid surface. [§63.1063(a)(1)(ii)(B)]
 - b) If an external floating roof storage tank does not currently meet the requirements of §63.1063(a)(1)(ii), openings through the deck of the floating roof (deck fittings) shall instead meet the following requirements: [Table 1 of Part 63 Subpart BBBBBB, Item 2.(d)]
 - i) Each opening except those for automatic bleeder vents (vacuum breaker vents) and rim space vents shall have its lower edge below the surface of the stored liquid. [§63.1063(a)(2)(i)]
 - ii) Each opening except those for automatic bleeder vents (vacuum breaker vents), rim space vents, leg sleeves, and deck drains shall be equipped with a deck cover. The deck cover shall be equipped with a gasket between the cover and the deck. [§63.1063(a)(2)(ii)]
 - iii) Each automatic bleeder vent (vacuum breaker vent) and rim space vent shall be equipped with a gasketed lid, pallet, flapper, or other closure device. [§63.1063(a)(2)(iii)]
 - iv) Each opening for a fixed roof support column may be equipped with a flexible fabric sleeve seal instead of a deck cover. [§63.1063(a)(2)(iv)]

- v) Each opening for a sample well or deck drain (that empties into the stored liquid) may be equipped with a slit fabric seal or similar device that covers at least 90 percent of the opening, instead of a deck cover. [§63.1063(a)(2)(v)]
- vi) Each cover on access hatches and gauge float wells shall be designed to be bolted or fastened when closed. [§63.1063(a)(2)(vi)]
- vii) Each opening for an unslotted guidepole shall be equipped with a pole wiper, and each unslotted guidepole shall be equipped with a gasketed cap on the top of the guidepole. [§63.1063(a)(2)(vii)]
- viii) Each opening for a slotted guidepole shall be equipped with one of the control device configurations specified in below: [§63.1063(a)(2)(viii)]
 - (1) A pole wiper and a pole float. The wiper or seal of the pole float shall be at or above the height of the pole wiper. [§63.1063(a)(2)(viii)(1)]
 - (2) A pole wiper and a pole sleeve. [§63.1063(a)(2)(viii)(2)]
- c) Each EFR shall meet the following operational requirements: [§63.1063(b)]
 - i) The floating roof shall float on the stored liquid surface at all times, except when the floating roof is supported by its leg supports or other support devices (e.g., hangers from the fixed roof). [§63.1063(b)(1)]
 - ii) When the storage vessel is storing liquid, but the liquid depth is insufficient to float the floating roof, the process of filling to the point of refloating the floating roof shall be continuous and shall be performed as soon as practical. [§63.1063(b)(2)]
 - iii) Each cover over an opening in the floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall be closed at all times, except when the cover must be open for access. [§63.1063(b)(3)]
 - iv) Each automatic bleeder vent (vacuum breaker vent) and rim space vent shall be closed at all times, except when required to be open to relieve excess pressure or vacuum, in accordance with the manufacturer's design. [§63.1063(b)(4)]
 - v) Each unslotted guidepole cap shall be closed at all times except when gauging the liquid level or taking liquid samples. [§63.1063(b)(5)]

Monitoring/Recordkeeping Requirements:

External Floating Roof, §63.11092(e)(1), §63.11094(a), and §63.1063(c) & (d):

- 1) The permittee must perform inspections as described in §63.1063(c)(2) for each external floating roof tank that will comply with 40 CFR Part 63 Subpart BBBB using the methods described in 40 CFR Part 63 Subpart WW, above. External Floating Roofs shall be inspected as follows: [§63.1063(c)(2)]
 - a) Within 90 days after the initial filling of the storage vessel, the primary and secondary rim seals shall be inspected to determine the presence and size of gaps between the rim seals and the wall of the storage vessel by the procedures specified in §63.1063(d)(3)(i). Any exceedance of the gap requirements specified in §63.1063(d)(3)(ii) and (d)(3)(iii), constitutes an inspection failure. [§63.1063(c)(2)(i) and §63.1063(d)(3)]
 - i) Rim seals shall be measured for gaps at one or more levels while the EFR is floating as specified in below: [§63.1063(d)(3)(i)]
 - (1) The inspector shall hold a 0.32 centimeter (1/8 inch) diameter probe vertically against the inside of the storage vessel wall, just above the rim seal, and attempt to slide the probe down between the seal and the vessel wall. Each location where the probe passes freely (without forcing or binding against the seal) between the seal and the vessel wall constitutes a gap. [§63.1063(d)(3)(i)(A)]

- (2) The length of each gap shall be determined by inserting the probe into the gap (vertically) and sliding the probe along the vessel wall in each direction as far as it will travel freely without binding between the seal and the vessel wall. The circumferential length along which the probe can move freely is the gap length. [§63.1063(d)(3)(i)(B)]
 - (3) The maximum width of each gap shall be determined by inserting probes of various diameters between the seal and the vessel wall. The smallest probe diameter should be 0.32 centimeter, and larger probes should have diameters in increments of 0.32 centimeter. The diameter of the largest probe that can be inserted freely anywhere along the length of the gap is the maximum gap width. [§63.1063(d)(3)(i)(C)]
 - (4) The average width of each gap shall be determined by averaging the minimum gap width (0.32 centimeter) and the maximum gap width. [§63.1063(d)(3)(i)(D)]
 - (5) The area of a gap is the product of the gap length and average gap width. [§63.1063(d)(3)(i)(E)]
 - (6) The ratio of accumulated area of rim seal gaps to storage vessel diameter shall be determined by adding the area of each gap, and dividing the sum by the nominal diameter of the storage vessel. This ratio shall be determined separately for primary and secondary rim seals. [§63.1063(d)(3)(i)(F)]
- ii) The ratio of seal gap area to vessel diameter for the primary seal shall not exceed 212 square centimeters per meter of vessel diameter (10 square inches per foot of vessel diameter), and the maximum gap width shall not exceed 3.81 centimeters (1.5 inches). [§63.1063(d)(3)(ii)]
 - iii) The ratio of seal gap area to vessel diameter for the secondary seal shall not exceed 21.2 square centimeters per meter (1 square inch per foot), and the maximum gap width shall not exceed 1.27 centimeters (0.5 inches), except when the secondary seal must be pulled back or removed to inspect the primary seal. [§63.1063(d)(3)(iii)]
- b) The secondary seal shall be inspected at least once every year, and the primary seal shall be inspected at least every 5 years, as specified in 63.1063(d)(3). [§63.1063(c)(2)(ii)]
 - c) Each time the storage vessel is completely emptied and degassed, or every 10 years, whichever occurs first, the EFR shall be inspected by visually inspecting the floating roof deck, deck fittings, and rim seals from within the storage vessel. The inspection may be performed entirely from the top side of the floating roof, as long as there is visual access to all deck components specified in §63.1063(a)(1). Any of the conditions described below constitutes an inspection failure: [§63.1063(c)(2)(iii)]
 - i) Stored liquid on the floating roof. [§63.1063(d)(1)(i)]
 - ii) Holes or tears in the primary or secondary seal (if one is present). [§63.1063(d)(1)(ii)]
 - iii) Floating roof deck, deck fittings, or rim seals that are not functioning as designed as specified in §63.1063(a) [§63.1063(d)(1)(iii)]
 - iv) Failure to comply with the operational requirements of §63.1063(b). [§63.1063(d)(1)(iv)]
 - v) Gaps of more than 0.32 centimeters (1/8 inch) between any deck fitting gasket, seal, or wiper required by §63.1063(a), and any surface that it is intended to seal. [§63.1063(d)(1)(v)]
 - d) If the permittee determines that it is unsafe to perform the floating roof inspections specified in 63.1063(c)(2)(i) and (c)(2)(ii), the permittee shall comply with the requirements listed below: [§63.1063(c)(2)(iv)]
 - i) The inspections shall be performed no later than 30 days after the determination that the floating roof is unsafe. [§63.1063(c)(2)(iv)(A)]
 - ii) The storage vessel shall be removed from liquid service no later than 45 days after determining the floating roof is unsafe. If the vessel cannot be emptied within 45 days, the permittee may utilize up to two extensions of up to 30 additional days each. If the vessel

cannot be emptied within 45 days, the permittee may utilize up to two extensions of up to 30 additional days each. Documentation of a decision to use an extension shall include an explanation of why it was unsafe to perform the inspection, documentation that alternative storage capacity is unavailable, and a schedule of actions that will ensure that the vessel will be emptied as soon as practical. [§63.1063(c)(2)(iv)(B)]

- 2) The permittee shall repair conditions causing inspection failures under §63.1063(c)(2) as specified below: [§63.1063(e)]
 - a) If the inspection is performed while the storage vessel is not storing liquid, repairs shall be completed before the refilling of the storage vessel with liquid. [§63.1063(e)(1)]
 - b) If the inspection is performed while the storage vessel is storing liquid, repairs shall be completed or the vessel removed from service within 45 days. If a repair cannot be completed and the vessel cannot be emptied within 45 days, the permittee may use up to 2 extensions of up to 30 additional days each. Documentation of a decision to use an extension shall include a description of the failure, shall document that alternate storage capacity is unavailable, and shall specify a schedule of actions that will ensure that the control equipment will be repaired or the vessel will be completely emptied as soon as practical. [§63.1063(e)(2)]
- 3) Notify the Missouri Department of Natural Resources Air Pollution Control Program in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by §63.1063(d)(1) or (d)(3)), to afford the Department of Natural Resources the opportunity to have an observer present. If the inspection is not planned and the permittee could not have known about the inspection 30 days in advance or refilling the tank, the permittee shall notify the Department of Natural Resources at least 7 days before the inspection. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Department of Natural Resources at least 7 days prior to the refilling. [§63.1066(b)(1)]
- 4) The permittee shall keep a record of the dimensions of the storage vessel, an analysis of the capacity of the storage vessel, and an identification of the liquid stored for each storage tank. This record shall be maintained onsite for the life of the tank or a minimum of five years, whichever is longer. [§63.1065(a)]
- 5) The permittee shall keep a record of each inspection performed as required by §63.1063(c)(2). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment. A record shall be kept of EFR seal gap measurements, including the raw data obtained and any calculations performed. If the floating roof fails inspection, the record shall also include a description of all inspection failures, a description of all repairs and the dates that they were made, and the date that the storage vessel was removed from service, if applicable.
- 6) The permittee shall keep a record of the date when a floating roof is set on its legs or other support devices. The permittee shall also keep a record of the date when the roof was refloated, and the record shall indicate whether the process of refloating was continuous.
- 7) The permittee shall keep the documentation required by §63.1063(c)(2)(iv)(B) and §63.1063(e)(2), in the event that an extension is requested and/or used.
- 8) The permittee shall maintain all records for a minimum of five years unless a longer period is specified with the requirement. All records shall be kept in such a manner that they can be readily accessed within 24 hours. Records may be kept in hard copy or computer-readable form including, but not limited to, on paper, microfilm, computer, floppy disk, magnetic tape, or microfiche.

- 9) The permittee shall immediately make any records available to Missouri Department of Natural Resources personnel upon request.

Reporting Requirements:

Notifications required by §63.11093 and §63.9 for 40 CFR Part 63, Subpart BBBBBB:

- 1) The permittee shall submit the following notifications to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 as applicable for each external floating roof tank that will comply with 40 CFR Part 63 Subpart BBBBBB using the methods described in 40 CFR Part 63 Subpart WW:
- a) The permittee shall submit an initial notification as specified in §63.9(b) to the Air Pollution Control Program which indicates that the installation is subject to 40 CFR 63 Subpart BBBBBB. For existing tanks the initial notification is due by May 9, 2008.
 - b) The permittee shall submit a Notification of Compliance Status as specified in §63.9(h). The Notification of Compliance Status must state which of the compliance options referenced in Table 1 to Subpart BBBBBB is used to comply with the subpart.
 - c) The permittee shall submit a written Notification of Performance Test as specified in §69.9(e) prior to initiating testing intended to demonstrate compliance with the compliance option selected. The Notification must be submitted at least 60 calendar days before the performance test is scheduled to begin to allow the Missouri Department of Natural Resources, Air Pollution Control Program to review and approve the site-specific test plan required under §63.7(c), if requested by the Department of Natural Resources, and to have an observer present during the test.
 - d) The permittee shall submit additional notifications specified in §63.9, as applicable.

Reports required for Internal Floating Roof Tanks by §63.11095(a)(1) and §63.1066:

- 2) The permittee shall submit the following reports to the Air Pollution Control Program, Enforcement Section, P.O. Pox 176, Jefferson City, MO 65102 as applicable for each external floating roof tank that will comply with 40 CFR Part 63 Subpart BBBBBB using the methods described in 40 CFR Part 63 Subpart WW:
- a) After installing the external floating roof as described in Equipment/Procedural Requirements above, the permittee shall submit a report to the Air Pollution Control Program that describes the control equipment and certifies that the control equipment meets the specifications of §63.1063(a)(1), §63.1063(a)(2) [if applicable], §63.1063(b) and §63.0163(c). The report shall be postmarked within 15 days after the actual date of initial startup of the tank as equipped with the control equipment that meets the specifications.
 - b) If inspection failures described in §63.1063(c) and (d), are detected, the permittee shall submit a copy of the inspection record to the Air Pollution Control Program within 30 days of the inspection. The report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made. The report shall also include any extensions requested and/or used under §63.1063(c)(2)(iv)(B) and §63.1063(e)(2).

General, All:

- 3) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

PERMIT CONDITION 6		
Voluntary Limitations		
Fixed Roof Petroleum Storage Tanks with a Storage Capacity greater than 75 cubic meters, Constructed prior to June 11, 1973		
EIQ Reference #	Description	Manufacturer/Model #
EP-05	Tank #3209: 0.036 Million Gallon Fixed Roof Tank	Unknown (Prior to 1950)

Emission/Operational Limitations:

The permittee shall not store gasoline in Tank #3209.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain record of the written notification submitted and approval, including the effective date of the restriction.
- 2) The permittee shall maintain records of the petroleum liquid stored in EP-05 using the log shown in Attachment D-2 or an equivalent created by the permittee. These records shall contain at least the following information:
 - a) The name of each petroleum liquid stored; and
 - b) The period that each petroleum liquid was stored in the tank.
- 3) The permittee shall maintain non-gasoline storage tanks, tank roofs and all associated valves, piping, fittings, etc. subject to this permit condition in good operating condition and keep records of all maintenance, repairs and tests performed on such tanks using the log shown in Attachment C or an equivalent created by the permittee.
- 4) The permittee shall maintain all records onsite for a minimum of five years.
- 5) The permittee shall immediately make any record available for inspection to Missouri Department of Natural Resources personnel upon request.

Reporting:

- 1) The permittee must submit a written notification to the Missouri Department of Natural Resources, Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 stating that a designated tank will no longer be used to store gasoline.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

PERMIT CONDITION 7		
10 CSR 10-6.065(6)(C)2.A. Voluntary Limitation		
EIQ Reference #	Description	Manufacturer/Model #
N/A	Portable Air Stripper, shared between various Midwest installations, used on an as needed basis	Unknown

Emission Limitations:

- 1) The permittee shall discharge less than 5 tons of volatile organic compounds (VOC) from the operation of the portable stripper during any consecutive 12-month period.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain monthly records of the volume of hydrocarbon contaminated water processed through the stripper on a monthly basis.
- 2) The permittee shall calculate monthly emissions of VOCs associated with the operation of the portable stripper. The permittee shall record VOC emissions on a monthly basis with a consecutive 12-month total.
- 3) Attachment F (Volatile Organic Pollutant (VOC) Emissions Log) contains a log satisfying these recordkeeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 4) The permittee shall maintain these records on site for the most recent 60 months.
- 5) The permittee shall immediately make such records available to any Department of Natural Resources personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month, if the consecutive 12-month total records show that the source exceeded the limitation of less than 5 tons of VOC emissions.
- 2) Reports of any deviations from the monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

PERMIT CONDITION 8		
40 CFR Part 63 Subpart CCCCCC <i>National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities</i>		
EIQ Reference #	Description	Manufacturer/Model #
N/A	One (1) 100-gallon storage tank used to fuel lawn mowers	Unknown

Operational Standards:

- 1) 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: [§63.11116(a)]
 - a) Minimize gasoline spills; [§63.11116(a)(1)]

- b) Clean up spills as expeditiously as practicable; [§63.11116(a)(2)]
 - c) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; [§63.11116(a)(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. [§63.11116(a)(4)]
- 2) The permittee shall, at all times, operate and maintain any affected source in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.11115(a)]

Recordkeeping:

- 1) The permittee shall keep record of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment. [§63.11125(d)(1)]
- 2) The permittee shall keep record of actions taken during periods of malfunction to minimize emissions in accordance with § 63.11115(a), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.11125(d)(2)]

Reporting:

The permittee is not required to submit notifications or reports as specified in §63.11125, § 63.11126, or subpart A of this part, but must have records available within 24 hours of a request by the Administrator to document your gasoline throughput. [§63.11116(b)]

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

- 1) **General Provisions.** The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

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

The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.

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

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 3) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is a State Only permit requirement.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. This odor evaluation shall be taken at a location outside of the installation's property boundary.

10 CSR 10-6.170

Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

The permittee shall not cause or permit to be discharged into the atmosphere from any source not exempted under 10 CSR 10-6.220 any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units.

Monitoring:

- 1) The permittee shall conduct visible emission observations on each emission unit using the procedures contained in USEPA Test Method 22. The permittee is only required to make observations when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The permittee must maintain the following monitoring schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
 - b) Should the permittee observe no violations of this regulation during this period then-
 - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - ii) If a violation is noted, monitoring reverts to weekly.
 - iii) Should no violation of this regulation be observed during this period then-
 - (1) The permittee may observe once per month.
 - (2) If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

The permittee shall maintain records of all observation results using Attachments B, C and D (or equivalents), noting:

- 1) Whether any air emissions (except for water vapor) were visible from the emission units;
- 2) All emission units from which visible emissions occurred;
- 3) Whether the visible emissions were normal for the process;
- 4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
- 5) The permittee shall maintain records of all USEPA Method 9 opacity tests performed.

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

This is a State Only permit requirement.

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees.

10 CSR 10-6.280 Compliance Monitoring Usage

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

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

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
 - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.

- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
 - 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
 - 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*

V. General Permit Requirements

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

10 CSR 10-6.065(6)(C)1.B Permit Duration

10 CSR 10-6.065(6)(E)3.C Extension of Expired Permits

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

10 CSR 10-6.065(6)(C)1.C General Record Keeping and Reporting Requirements

1) Record Keeping

- a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
- b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.

2) Reporting

- a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
- b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
- c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
- d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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

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

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

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

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

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

10 CSR 10-6.065(6)(C)1.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 April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:

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

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

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.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, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

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

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
 - d) The permit shield shall not apply to these changes.

10 CSR 10-6.020(2)(R)34 Responsible Official

The application utilized in the preparation of this permit was signed by Mark Petersen, Vice President, Sinclair Transportation Company. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants

made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit shall be reopened for cause if:

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

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

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

VI. Attachments

Attachments follow.

Attachment G
Compliance Assurance Monitoring Plan

Monitoring

Indicator to be monitored:	Pilot flame presence
Designated condition of Indicator:	Pilot flame on / Pilot flame off
Monitor type:	Optical (UV, IR, etc.), thermocouple, RTD or other appropriate device.
Monitor location:	In proximity of flame from pilot assembly.
Performance criteria:	Loading of gasoline into tank trucks is allowed upon verification of pilot flame. During loading, the vapors are destructed by the flare. In the event the pilot flame is not present, loading of gasoline at the loading rack is interlocked to stop. Gasoline loading at rack may begin again when the pilot flame is reestablished.
Data representation:	Performance testing conducted on May 6, 1997 was successfully completed with the pilot flame sensor monitoring system operational. This established the "pilot flame on" condition as a representative indicator that the flare was performing within regulatory emissions limit.
Verification procedure:	The functionality of the pilot flame detection system and interlock will be verified annually by confirming the loading operation is shut down at the "no flame" condition.
Quality Assurance:	The loading rack, vapor collection system, John Zink enclosed ground flare and associated instrumentation and control system logic will be maintained per manufacture's recommendations and good maintenance practices. The vapor collection / flare system is inspected on a monthly basis.
Monitoring Frequency:	When the flare is required to operate, the presence of pilot flame is continuously monitored during the loading sequence.

Attachment 1: Compliance Assurance Monitoring Plan

Background

Facility: Sinclair Oil Corporation
Carrollton Station

Operating Permit #: OP 2000012

Unit Name: Tank Truck Loading Rack / Flare

Unit ID: EU 0030

Process Description: During the tank truck loading operation, displaced vapors from the carriers are vented through the vapor collection system and are vented to a flare where they are thermally destructed.

Prior to loading, each tank truck must have a valid vapor tightness certificate on file and verification of the tank truck identification number corresponding to the valid vapor tightness certificate is made by the automated control system. Connection of the tank truck to the vapor collection system and ground also must be established prior to loading.

Regulatory Applicability

Applicable Regulation: 40 CFR 60 subpart XX

Controlled Pollutant: VOC

Emission Limit: 35 mg/l gasoline loaded

Control Technology

Control Device: John Zink enclosed ground flare

Control Technology: Combustion of organic vapors

Attachment H
Storage Tank Emission Reduction Partnership Program (STERPP) Agreement

STORAGE TANK EMISSION REDUCTION PARTNERSHIP
CERTIFICATION AND AGREEMENT

CERTIFICATION

Carrollton Station and Terminal, Sinclair Oil Corporation ("Participating Company"), by Mr. Klane F. Forsgren, a responsible corporate official of Participating Company, certifies that:

1. Participating Company notified the United States Environmental Protection Agency ("EPA") of its intent to participate in the Storage Tank Emission Reduction Partnership Program within 60 days of the Program notice announced at Federal Register Vol. 65, No. 72, page 19891 (April 13, 2000).
2. Participating Company assessed and evaluated all of its NSPS Subpart Ka and Kb affected facilities¹ that are subject to equipment design requirements² and that have slotted guidepoles³ (hereinafter referred to as "Tanks") at each facility/location identified in Annex A.

¹ NSPS Subpart Ka affected facilities are petroleum liquid storage vessels with a capacity of greater than 40,000 gallons that were constructed, reconstructed or modified after May 18, 1978, 40 CFR 60.110a; NSPS Subpart Kb affected facilities are volatile organic liquid storage vessels with a capacity of greater than 40 cubic meters that were constructed, reconstructed or modified after July 23, 1984, 40 CFR 60.110b.

² The equipment design requirements for floating roof tanks apply only to certain NSPS Subpart Ka and Kb affected facilities. See 40 CFR 60.112a and 60.112b.

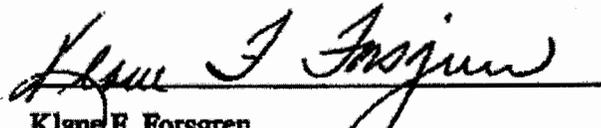
³ A slotted guidepole is a guidepole (or gaugepole) that has slots or holes through the wall of the pole. The slots or holes allow the stored liquid to flow into the pole at liquid levels above the lowest operating level.

3. Annex A (attached hereto and incorporated by reference herein) is a true, accurate and complete identification of:

- i. each Tank; and
- ii the year in which controls were installed at each Tank; and

4. The controls identified in Annex A were either specified in APPENDIX I to the Program notice (Acceptable Controls for Tanks with Slotted Guidepoles Under the Storage Tank Emission Reduction Partnership Program), attached hereto and incorporated by reference herein, or expressly determined by EPA to be acceptable for purposes of the Storage Tank Emission Reduction Partnership Program under APPENDIX I - 2.

I certify under penalty of law that the foregoing and the attached, including Annex A, is true, accurate, and complete to the best of my knowledge, information and belief after reasonable inquiry.



Klane F. Forsgren

Vice-President of Engineering, Environmental, Health and Safety

AGREEMENT

The United States Environmental Protection Agency ("EPA") and Carrollton Station and Terminal, Sinclair Oil Corporation ("Participating Company"), the parties herein, desire to enter into and be bound by the terms of this Storage Tank Emission Reduction Partnership Agreement ("Partnership Agreement" or "Agreement").

WHEREAS Participating Company recognizes that reducing emissions from tanks and other storage vessels with slotted guidepoles¹ can improve air quality while reducing evaporative

¹ A guidepole (also referred to as a gaugepole, gauge pipe or stilling well) is a vertically

product losses.

WHEREAS Participating Company is committed to environmental improvement and the cost-effective reduction of emissions.

WHEREAS EPA recognizes the value of cooperative emission reduction programs with industry.

WHEREAS Participating Company desires to participate in the Storage Tank Emission Reduction Partnership Program announced by EPA at Federal Register Vol. 65, No. 72, page 19891, April 13, 2000 (hereinafter referred to as "Program notice").

WHEREAS Participating Company certified that it had complied with the requirements of the Storage Tank Emission Reduction Partnership Program

NOW, THEREFORE, in consideration of the above and the mutual undertakings of each to the other, EPA and Participating Company agree as follows:

APPLICABILITY

1. The provisions of this Partnership Agreement shall apply to and be binding upon EPA and upon Participating Company, its officers, directors, agents, servants, employees, successors and assigns. Participating Company shall give notice of this Agreement to any successor in interest prior to the transfer of any ownership interest in any tank identified in Annex A.

oriented pipe or tube that is affixed to a tank and that passes through its floating roof. Slotted guidepoles are guidepoles with slots or holes that allow stored liquids to flow into the pole, thereby enabling representative samples to be collected from within the slotted guidepole.

product losses.

WHEREAS Participating Company is committed to environmental improvement and the cost-effective reduction of emissions.

WHEREAS EPA recognizes the value of cooperative emission reduction programs with industry.

WHEREAS Participating Company desires to participate in the Storage Tank Emission Reduction Partnership Program announced by EPA at Federal Register Vol. 65, No. 72, page 19891, April 13, 2000 (hereinafter referred to as "Program notice").

WHEREAS Participating Company certified that it had complied with the requirements of the Storage Tank Emission Reduction Partnership Program

NOW, THEREFORE, in consideration of the above and the mutual undertakings of each to the other, EPA and Participating Company agree as follows:

APPLICABILITY

1. The provisions of this Partnership Agreement shall apply to and be binding upon EPA and upon Participating Company, its officers, directors, agents, servants, employees, successors and assigns. Participating Company shall give notice of this Agreement to any successor in interest prior to the transfer of any ownership interest in any tank identified in Annex A.

oriented pipe or tube that is affixed to a tank and that passes through its floating roof. Slotted guidepoles are guidepoles with slots or holes that allow stored liquids to flow into the pole, thereby enabling representative samples to be collected from within the slotted guidepoles.

REPRESENTATIONS

2(a). Participating Company represents that:

a. Participating Company's Certification was made by a "responsible official" (i.e., the president, secretary, treasurer, or a vice-president of Participating Company, Participating Company's senior management representative(s) where such Tanks are located, or any other person who performs similar policy or decision-making functions for Participating Company.

b. The undersigned is a duly authorized representative of Participating Company, with full powers to make these representations, enter into this Agreement and bind Participating Company to the terms hereof.

(b). The undersigned EPA representative is authorized to enter into this Agreement and bind EPA to the terms hereof.

PARTICIPATING COMPANY UNDERTAKINGS

3. Participating Company shall properly operate and maintain all slotted guidepole controls identified on Annex A in the manner specified in Attachment 1 and shall include such controls and this requirement in federally enforceable permits issued by appropriate permitting authorities.

4. Participating Company shall not seek or obtain emission reduction credits for emission reductions that result from installing slotted guidepole controls or from the work required under Paragraph 3 of this section, nor shall it use such reductions to offset or net against other emission increases in any permitting or enforcement action required by or taken pursuant to state or federal law.

EPA UNDERTAKINGS

5. Compliance with the requirements set forth herein shall be deemed and will, therefore, constitute full settlement and satisfaction by EPA of those violations of the Standards of Performance for New Sources, Subparts Ka and Kb, that could be or could have been alleged in civil actions or proceedings brought by EPA or the United States concerning Participating Company's use of slotted guidepoles at Tanks identified in Annex A.

6. Within sixty (60) days of its receipt of this Partnership Agreement, EPA will promptly review and either sign and return a fully executed copy of that Agreement to Participating Company or identify deficiencies in Annex A. If deficiencies identified by EPA are not corrected and a revised Annex A submitted within thirty (30) days of Participating Company's receipt of such identification by EPA, Participating Company's opportunity to participate under the Storage Tank Emission Reduction Partnership Program shall then cease and all its rights, expectations, obligations and undertakings (if any) under that program and this Agreement shall terminate and be deemed a nullity.

MISCELLANEOUS PROVISIONS

7. Participating Company agrees to accept service from EPA by mail with respect to all matters relating to or arising under this Agreement at the address listed below:

Mr. Samuel B. Greene P.E.
Sinclair Oil Corporation
P. O. Box 30825
Salt Lake City, UT 84130-0825

8. Annex A of this Participation Agreement may be modified only if EPA and Participating Company agree and consent to such modification in writing.

9. This Agreement does not modify or affect in any way Participating Company's

responsibility to achieve and maintain compliance with all other applicable federal, state and local laws, regulations and permits.

10. Each party shall bear its own costs, attorney's fees and disbursements in this matter.

11. This document, including its Annex A, encompasses the entire agreement of the parties with respect to the subject matter hereof and totally supersedes all prior agreements and understandings, whether oral or in writing.

RESERVATION OF RIGHTS

12. By entering into the Agreement, EPA understands that Participating Company neither agrees nor concedes that its use of slotted guidepoles without the controls specified in Appendix I violate or violated any Clean Air Act requirement. Similarly, Participating Company understands that EPA neither agrees nor concedes that Participating Company's prior use of slotted guidepoles without such controls was acceptable or excused in any way or on any basis whatsoever. With respect to any tank(s) other than a Tank identified in Annex A, each party reserves all rights they may have to contest or otherwise litigate any issue arising out of any use of slotted guidepoles.

EFFECTIVE DATE

13. This Participation Agreement shall be effective when signed by both Participating Company and EPA.

BY: *Henry J. Ferguson VP*

SINCLAIR OIL CORPORATION

BY: _____

U.S. ENVIRONMENTAL PROTECTION
AGENCY

DATE: 12/7/00

DATE: _____

Attachment 1: Operating and Maintenance Requirements for Slotted Guidepole Controls Under the Storage Tank Emissions Reduction Partnership Program

The sliding cover shall be in place over the slotted-guidepole opening through the floating roof at all times except when the sliding cover must be removed for access. If the control technology used includes a guidepole float, the float shall be floating within the guidepole at all times except when it must be removed for access to the stored liquid or when the tank is empty.

Visually inspect the deck fitting for the slotted guidepole at least once every 10 years and each time the vessel is emptied and degassed. If the slotted guidepole deck fitting or control devices have defects, or if a gap of more than 0.32 centimeters (1/8 inch) exists between any gasket required for control of the slotted guidepole deck fitting and any surface that it is intended to seal, such items shall be repaired before filling or refilling the storage vessel with regulated material.

Tanks taken out of hydrocarbon service, for any reason, do not have to have any controls in place during the time they are out of service.

ANNEX A

STORAGE TANK EMISSIONS REDUCTION
 PARTNERSHIP AGREEMENT

FACILITY / COMPANY Carrollton Station and Terminal, Sinclair Oil Corporation
 EPA ID # MOD985792209

1	2	3	4	5	6	7
Facility Name and Location (Include Full Address if more than one facility is listed)	Each Tank Subject to NSPS Ka or Kb w/a Slotted Guide Pole (Tank ID)	Date When Final Controls Were Installed ¹	Type of Control Installed (Re: Appendix 1)	Date by Which INTERIM Controls Will Be Installed (If Required)	Emission Reductions Predicted (For tank without existing acceptable controls)	Remarks
Carrollton Station and Terminal, Sinclair Oil Corporation Rt. # 4 Box # 4A Carrollton, MO 64633	Tank 3212	April 13, 2000	Pole float System	Not Applicable	118 lbs. VOC per year	Not Applicable

SIGNATURE SB Greene 12/6/00

¹ Note: For Tanks with existing acceptable controls (installed before 1/14/00), enter the date of Final Program Notice. If Tank must be degassed and taken out of service in order to install Appendix 1 controls, indicate date when float will be installed [Interim - Column 4] and date when tank will be degassed and taken out of service and work completed [Final - Column 3]. If tank must be degassed and taken out of service to install Interim or Final controls, provide brief justification in Column 6, "Remarks". If tank would also have to be degassed to install Interim controls, indicate "N/A" in Column 4.

Attachment I
 Combined HAPs Compliance

Emission Unit	Throughput (Mgal)	Combined HAPs Emission Factor (lb/Mgal)	¹ Combined HAPs Emissions (tons)
EP-01 (Standing Loss)		0.0434	
EP-01 (Withdrawal Loss)		0.0006	
EP-02 (Working Loss)		0.0017	
EP-02 (Breathing Loss)		0.0016	
EP-03 (Working Loss)		0.0017	
EP-03 (Breathing Loss)		0.0399	
EP-04 (Withdrawal Loss)		0.0011	
EP-04 (Standing Loss)		0.3670	
EP-06 (Withdrawal Loss)		0.0004	
EP-06 (Standing Loss)		0.0079	
EP-07 (Normal Service)		0.0006	
EP-07 (Balanced Service)		0.0077	
EP-10 (Equipment Leaks: Gasoline and Vapor Service)		122.76	
EP-10 (Equipment Leaks: Fuel Oil)		0.8795	
Summation of all Emission Units Combined HAPs Emissions			
²Summation of Current Month and Previous 11 Months Combined HAPs Emissions			

¹ [Combined HAPs Emissions] = [Throughput] x [Combined HAPs Emission Factor] x 0.005 lb/ton

² Add the current months summation of all Emission Units Combined HAPs Emissions to that of the previous 11 months.

STATEMENT OF BASIS

Installation Description

Sinclair Transportation Company operates a bulk petroleum storage and distribution terminal in Carrollton, MO with an aggregate storage capacity of 15,663,314 gallons. The terminal operates three (3) vertical tanks equipped with internal or external floating roofs storing petroleum products, three (3) vertical fixed roof tanks storing petroleum products, three (3) fixed roof tanks storing oxygenators, and a submerged loading truck rack. The installation also functions as a pipeline pumping station that receives petroleum products from the Olathe terminal in Kansas and pumps products to Montrose terminal in Iowa. Volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions result from the bulk storage and transfer, loading and unloading of gasoline and diesel fuel. Product additives, ethanol or other oxygenators may be added to the petroleum products prior to distribution.

Sinclair Transportation Company, Carrollton Products Terminal is a major source for VOC emissions. The facility has taken a limitation on the emission of HAPs to remain a minor source for HAP emissions.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr)
CO	6.46
HAP (Combined)	9.667
NO _x	4.38
PM ₁₀	0.11
PM ₂₅	0.058
SO _x	0.01
VOC	222

*Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

**Emissions include the control by the flare.

Reported Air Pollutant Emissions, tons per year

Pollutants	2016	2015	2014	2013	2012
Nitrogen Oxides (NO _x)	1.15	1.17	1.19	1.21	1.24
Volatile Organic Compounds(VOC)	80.63	80.69	79.74	75.38	75.34
Carbon Monoxide (CO)	2.89	2.93	2.97	3.03	3.10
Hazardous Air Pollutants (HAPs)	2.15	2.37	2.34	2.27	2.27

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 22, 2014;
- 2) 2016 Emissions Inventory Questionnaire, received April 28, 2017;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition; and
- 4) Construction Permit 1195-004A Issued April 17, 1996.

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.

None

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.

10 CSR 10-6.100, *Alternate Emission Limits*

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

Construction Permit Revisions

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

- 1) Construction Permit #1195-004A, Issued May 29, 1996: The word "flare" in special permit condition 6 was replaced by "vapor collection and disposal unit (VDU)" in permit conditions 2, 3, and 4. The unit which controls emissions from the EP-07 Submerged Loading Truck Rack is a John Zink Model ZCT2-6-35-2-2/6-XX, an enclosed flare. An enclosed flare is considered to be a thermal oxidation system and is not subject to the exceptions in the applicable NSPS or MACT regulations. According to EPA determinations, a "flare" for which there are exceptions in the applicable regulations is defined as an "open flame" flare. Therefore, the description of the emission control unit was changed to avoid confusion.
Special Condition 2 of this construction permit was previously included as a plant wide permit conditions of the previous operating permit. This plant wide condition has been removed since the same condition is applied in the Core Permit requirements.
- 2) Construction Permit #0796-005, Issued June 10, 1996: This construction permit states the two tanks are 19,800 gallons in capacity. According to facility records, these are Tanks 3239 and 3240 which each have a capacity of 16,000 gallons. As discussed below, these tanks currently do not have any emission unit specific requirements.
- 3) Construction Permit #0897-032, Issued August 26, 1997: Special Condition 2 of this construction permit was previously applied to the plant wide permit conditions of the previous operating permit. This plant wide condition has been removed since the same condition is applied in the Core Permit requirements.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart K – *Storage Vessels for Petroleum Liquids which Construction, Reconstruction, or Modification started between (6/11/73 – 5/19/78)*

This rule was determined not to be applicable to the installation because no existing tanks storing petroleum liquids as defined by the rule were installed, reconstructed, or modified during the time period covered.

40 CFR Part 60, Subpart Ka – *Storage Vessels for Petroleum Liquids which Construction, reconstruction, or Modification started between 5/19/78 – 7/23/84*

This rule was determined not to be applicable to the installation because no existing tanks storing petroleum liquids as defined by the rule were installed, reconstructed, or modified during the time period covered.

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*

- 1) This rule was determined to be applicable to EP-06 [Tank #3212]. This tank was constructed after July 23, 1984, is currently equipped with an internal floating roof, and has a capacity greater than 151 m³ (39,890 gallons). This tank is used to store gasoline, which has a vapor pressure greater than or equal to 3.5 kilopascals (kPa).
 - a) Permit Condition 1 includes provisions for the requirements of Subpart Kb that are specific to internal floating roof tanks, i.e. 40 CFR 60.112b(a)(1), 60.113b(a), and 60.115b(a) because the tank is currently equipped with an internal floating roof.
 - b) Permit condition 1 includes the restriction from 40 CFR 60.112b(b) prohibiting storing volatile organic liquids with a vapor pressure of greater than or equal to 76.6 kPa (11.1 psia) because the tank is not equipped with a closed vent and control system or equivalent. Although it is unlikely, a gasoline product handled by the installation could have a vapor pressure greater than or equal to 11.1 psia at storage temperatures greater than 80 °F. Therefore, the monitoring requirements of 40 CFR 116b(c) were included as item 2 under Monitoring/Recordkeeping and an example form is included in Attachment D.
- 2) This rule was determined not to be applicable to EP-01, EP-04, and EP-05 [Tanks #3201, #3204, and #3209], although each tank is greater than 75 m³ in capacity, for the following reasons:
 - a) Each tank was originally constructed prior to July 23, 1984.
 - b) No changes have been made to the tanks that have met the definition of a modification since no change has resulted in an increase in the amount of pollutants emitted and no new pollutants have been emitted.
 - c) No changes have been made to the tanks that have met the definition of a reconstruction.
 - d) As discussed below under “Maximum Available Control Technology (MACT) Applicability”, these emission units are subject to 40 CFR Part 63, Subpart BBBBBB, which references the control requirements for storage tanks found 40 CFR Part 60, Subpart Kb. However, the use of 40 CFR Part 60, Subpart Kb for the purpose of compliance with 40 CFR Part 63, Subpart BBBBBB is included under the discussion of MACT Applicability for Subpart BBBBBB and was not determined to cause the EP-01, EP-04, EP-05 tanks to be subject to Subpart Kb.
- 3) This rule was determined not to be applicable EP-08 and EP-09 [Tanks #3239 and #3240] for the following reasons:

- a) These tanks were originally constructed prior to July 23, 1984 and were then moved to the Sinclair Transportation Company – Carrollton Products Terminal without any physical modifications. The tanks were relocated according to construction permit #0796-005, issued June 10, 1996.
- b) Both tanks are less than 75 m³ in capacity.
- 4) This rule was determined not to be applicable EP-11 [Tanks #3241]. Although this tank was constructed after July 23, 1984, it is less than 75 m³ in capacity.
- 5) This rule was determined not to be applicable to the Offspec Product / Wastewater Tank although the tank is greater than 75 m³ in capacity, for the following reasons:
 - a) This tank was originally constructed prior to July 23, 1984 and was then moved to the Sinclair Transportation Company – Carrollton Products Terminal without any physical modifications. No changes have been made to the tank that meets the definition of a reconstruction.
 - b) The tank is greater than 151 m³ in capacity. As per §60.110b(b), the rule is not applicable to storage vessels with a capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) or 0.5076 mm Hg.
 - c) The tank holds a combination of stormwater runoff, which may contain drips and leakage from seals; small amounts offspec product; and water from hydrotesting the pipeline, which also may contain trace amounts of product. Spills of petroleum products are not sent to this tank. It is unlikely that the tank would hold material with a true vapor pressure that exceeds 0.5076 mm Hg, as calculated using Raoult's law.
- 6) This rule was determined not to be applicable to the five additive tanks because all tanks are less than 75 m³ in capacity.

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

- 1) This rule was determined to be applicable EP-07 [5-Arm Single Bay Submerged Loading Truck Rack]. The Loading Rack was installed in 1996. A John Zink Model ZCT2-6-35-2-2/6-XX enclosed flare was installed to control emissions. The installation is also subject to 40 CFR Part 63 Subpart BBBBBB, so the installation is required to comply with the provisions in each subpart that contain the most stringent control requirements for the emission unit. The requirements for both rules were incorporated into permit condition 3.
 - a) The installation conducted a performance test of the VDU on May 6, 1997 which demonstrated compliance with the emission limit of 35 mg TOC / liter gasoline for gasoline emissions from new units (§60.502(b)) and has been operating in compliance with the limit since that time. This is more stringent than the emission limit from §63.11087(a) and Table 2 to Subpart BBBBBB of 80 mg TOC / liter gasoline.
 - b) The loading rack is currently equipped with a John Zink Model ZCT2-6-35-2-2/6-XX vapor combustion unit. This unit is an enclosed flare but it is classified as a thermal oxidation system and not as a flare. Therefore, permit condition 3 does not include provisions for the requirements of Subpart XX that are specific to flares.
 - c) The recordkeeping conditions of §60.505(c), (d), and (f) were modified to require records to be maintained for a minimum of 5 years, the more stringent requirement specified in 40 CFR Part 63 Subpart BBBBBB.
 - d) The leak inspection requirements of §60.502(j) were determined to overlap with the leak inspection requirements of 40 CFR Part 63 Subpart BBBBBB. Therefore both requirements were incorporated as a plant-wide emission limitation for all equipment in gasoline service, permit condition PW001.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63 Subpart R – *National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)*

This rule was determined not to be applicable to the installation because it is not a major source of hazardous air pollutants (HAPs).

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

The provisions of this subpart apply only if specifically referenced by another applicable rule. This rule was determined not to apply to the installation because no applicable subpart of 40 CFR 60, 61, or 63 references its use.

40 CFR Part 63 Subpart TT – *National Emission Standards for Equipment Leaks – Control Level 1*

The provisions of this subpart apply only if specifically referenced by another applicable rule. This rule was determined not to apply to the installation because no applicable subpart of 40 CFR 60, 61, or 63 references its use.

40 CFR Part 63 Subpart UU – *National Emission Standards for Equipment Leaks – Control Level 2*

The provisions of this subpart apply only if specifically referenced by another applicable rule. This rule was determined not to apply to the installation because no applicable subpart of 40 CFR 60, 61, or 63 references its use.

40 CFR Part 63 Subpart WW – *National Emission Standards for Storage Vessels (Tanks) – Control Level 2*

- 1) The provisions of this subpart apply only if specifically referenced by another applicable rule. This rule was determined not to apply to the installation because no applicable subpart of 40 CFR 60, 61, or 63 references its use.
- 2) As discussed below under “Maximum Available Control Technology (MACT) Applicability”, the installation was determined to be subject to 40 CFR Part 63, Subpart BBBBBB. The installation may elect to comply with the control requirements for storage tanks found in this rule using specified provisions of 40 CFR Part 63, Subpart WW. However, the use of 40 CFR Part 63, Subpart WW for the purpose of compliance with 40 CFR Part 63, Subpart BBBBBB is included under the discussion of MACT Applicability for Subpart BBBBBB and was not determined to cause these tanks to be subject to Subpart WW.

40 CFR Part 63 Subpart BBBBBB – *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities*

This rule was determined to be applicable to the installation because Sinclair Transportation Company – Carrollton Products Terminal is a bulk gasoline terminal which is not subject to the control requirements of 40 CFR Part 63, Subpart R. The rule provides compliance requirements for storage tanks and loading racks and for all equipment and components in vapor or liquid gasoline service.

40 CFR Part 63 Subpart CCCCCC

This rule was determined to be applicable to the 100 gallon gasoline tank used to fuel lawn mowers. IT has been included in this operating permit as Permit Condition 8.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61 Subpart J – *National Emission Standards for Equipment Leaks (Fugitive Emission Sources) of Benzene*

The provisions of this subpart apply to equipment such as pumps, compressors, valves, lines, etc. that operate in benzene service. The gasoline, petroleum distillates, and oxygenators stored and handled by the installation all contain less than 10% by weight benzene. Therefore, the equipment at the installation is not considered to be in benzene service as defined in 40 CFR 61.111 and the rule is not applicable to the installation.

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

The provisions of this subpart apply to equipment such as pumps, compressors, valves, lines, etc. that operate in volatile hazardous air pollutant (VHAP) service. The VHAPs defined by the rule are benzene and vinyl chloride. The gasoline, petroleum distillates, and oxygenators stored and handled by the installation all contain less than ten percent (10%) by weight of benzene and do not contain vinyl chloride. Therefore the equipment at the installation is not considered to be in VHAP service as defined by 40 CFR 61.240 and the rule is not applicable to the installation.

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 was determined to be applicable to EP-07, the Truck Loading Rack, because this emission unit uses a control device to achieve compliance with the Total Organic Compound (TOC) emission limits in 40 CFR Part 60 Subpart XX, Standards of Performance for Bulk Gasoline Terminals and 40 CFR Part 63 Subpart BBBBBB, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.

Permit Condition 2 contains the Compliance Assurance Monitoring Approach for the CEMS and Attachment G contains the Compliance Assurance Monitoring Plan.

Emission Units without Limitations

The following emission units were determined not to have emission unit specific permit requirements. However, these units may be subject to the plant wide permit condition and emissions from these operations may be reportable in the annual emissions inventory.

- 1) EP-02 and EP-03 [Tanks #3202 and #3203]: These tanks store diesel only. Diesel does not meet the definition of gasoline as applicable to 40 CFR Part 63 Subpart BBBBBB. These tanks were installed prior to 1973 and as indicated above, the NSPS requirements of 40 CFR Part 60 Subpart K, Ka, and Kb are not applicable and no other regulations were determined to apply to these units.

- 2) EP-08, EP-09, EP-11 [Tanks #3239, #3240, and #3241]: These tanks store ethanol. Ethanol does not meet the definition of gasoline as applicable to 40 CFR Part 63 Subpart BBBBBB. As indicated above, the NSPS regulations of 40 CFR Part 60 Subpart Kb are not applicable and no other regulations were determined to apply to this unit.
- 3) EP-10 [Fugitive emissions from pumps, valves, fittings, etc. and vehicle vapor transit losses]: This equipment handles gasoline, diesel, ethanol, gasoline additives, and diesel additives. As discussed above, this equipment is subject to the emission leak requirements of 40 CFR Part 60 Subpart XX and 40 CFR Part 63 Subpart BBBBBB. Since these requirements were incorporated into the plantwide emission limitations for equipment leaks described in permit condition PW001, EU0120 was not given an emission unit specific limitation. No other regulations were determined to apply to this unit.
- 4) Wastewater/Offspec Product Tank: This tank stores combination of stormwater runoff, which may contain drips and leakage from seals; small amounts offspec product; and water from hydrotesting the pipeline, which also may contain trace amounts of product. Spills of petroleum products are not sent to this tank. This unit is expected to hold only minimal amounts of petroleum distillates or gasoline and would not meet the definition of gasoline as applicable to 40 CFR Part 63 Subpart BBBBBB. As indicated above, the NSPS regulations of 40 CFR Part 60 Subpart Kb are not applicable and no other regulations were determined to apply to this unit.
- 5) Five Additive Tanks: These tanks store gasoline and diesel additives. These additives do not meet the definition of gasoline as applicable to 40 CFR Part 63 Subpart BBBBBB. As indicated above, the NSPS requirements of 40 CFR Part 60 Subpart Kb are not applicable and no other regulations were determined to apply to these units.

Other Regulatory Determinations

10 CSR 10-6.065(6)(C)2.A. – Voluntary Limitation

Sinclair Transportation Company – Carrollton Products Terminal operates a portable air stripper on an as needed basis to remove contaminants from the water in the wastewater storage tank so as to meet the discharge requirements of the facility's NPDES permit. The air stripper is used infrequently and is shared between various Sinclair Transportation Company facilities that are located in the midwest. Sinclair requested that this unit be added to the operating permit, with a voluntary emissions limit of five (5) tons of volatile organic compound (VOC) emissions per any consecutive 12-month period. Permit Condition 7 incorporates these conditions.

As presented in Table 2, below, hazardous air pollutant (HAP) emissions associated with limiting VOC emissions to a maximum of 5 tons per year would be less than 1.5 tons per year.

TABLE 2 – Potential VOC and HAP Emissions from the Operation of the Portable Air Stripper				
Compound	Scenario a: All HAP due to the presence of Gasoline		Scenario b: All HAP due to the presence of Diesel	
	Liquid Mass Fraction	Emissions (tons)	Liquid Mass Fraction	Emissions (tons)
Benzene	0.0188	0.0940	0.0000	0.0000
Hexane	0.0181	0.0905	0.0000	0.0000
o-Xylene	0.0349	0.1745	0.0003	0.0015
m-Xylene	0.0448	0.2240	0.0006	0.0030
p-Xylene	0.0448	0.2240	0.0000	0.0000
Toluene	0.0972	0.4860	0.0002	0.0010
Ethylbenzene	0.0207	0.1030	0.0000	0.0000
Naphthalene	0.0013	0.0065	0.0017	0.0085
2,2,4-Trimethylpentane	0.0151	0.0755	0.0000	0.0000
Cumene	0.0017	0.0085	0.0000	0.0000
Non-HAP VOC	0.7026	3.5130	0.9972	4.9860
Total VOC	--	5.0000	--	5.0000
Total HAP	--	1.4870	--	0.0140

* 100% of the gasoline and diesel are assumed to be VOC.

10 CSR 10.6.220 – *Restriction of Emission of Visible Air Contaminants*

All of the emission units with the exception of the Vapor Disposal Unit (VDU) associated with EP-07 emit only volatile organic compounds (VOC). These VOC emissions are not in a form to be considered to be visible air contaminants. The VDU for emission unit EP-07, the truck loading racks, may emit combustion byproducts and is the only emission unit potentially subject to this rule. The VDU is a John Zink model ZCT2-6-35-2-2/6-XX enclosed flare, which is designed for smokeless operation. Although visible emissions will be unlikely from this source, permit condition 4 includes monitoring requirements for this rule. The VDU was permitted in 1995 and would be subject to the requirements for a new source under the rule.

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).

Response to Public Comments

Two comments were received from Mark Smith, Air Permitting and Compliance Branch Chief of EPA Region 7 on August 03, 2017. Two comments were received from Mark Smith, Air Permitting and Compliance Branch Chief of EPA Region 7 on October 13, 2017. The comments are addressed in the order in which they appear within the letter(s).

Comment 1:

First, Permit Condition PW001 incorporates the special conditions from Permit to Construct #1195- 004A, issued May 29, 1996 to: first, limit the discharge of any individual hazardous air pollutant (HAP) to less than 10 tons and less than 25 tons of HAPs in aggregate during any consecutive 12-month period; and second to establish an emissions cap on all sources at this installation. Permit Condition PW001 also requires the permittee to calculate monthly emissions of HAPs associated with storage, transfer and handling operations at this installation, including fugitive emissions, and record all individual HAP and aggregate HAP emissions on a monthly basis and a consecutive 12-month total, using Attachment E (Hazardous Air Pollutant (HAP) Emissions Log) or an equivalent created by the permittee; to certify compliance with the emission limit requirements. However, neither Attachment E nor the requirements in Permit Condition PW001 describe how Sinclair-Carrollton calculates the HAP emissions from all sources associated with storage, transfer and handling, including fugitives.

Based on EPA's response in the order granting in part a petition for objection to the operating permit for Yuhuang Chemical, Inc.-Methanol Plant in St. James Parish, Louisiana (August 31, 2016), Permit Condition PW001 may not be enforceable. In their petition response, EPA says that if a permit applicant agrees to restrict a facility's potential-to-emit (PTE), only limits that meet certain enforceability criteria may be used to restrict the PTE and the permit must include terms and conditions such that the source cannot legally exceed the limits. One of the key concepts in evaluating the enforceability of PTE limits is whether the limits are enforceable as a practical matter. Moreover, the concept of federal enforceability has also been interpreted to encompass a requirement for practical enforceability. In order for emission limits to be enforceable as a practical matter, the permit must clearly specify **how** (emphasis added) emissions will be measured or determined for purposes of demonstrating compliance with the limits. Thus, limitations must be supported by monitoring, record keeping and reporting requirements sufficient to enable regulators and citizens to determine whether the limits have been exceeded, and if so, to take appropriate action. This draft Part 70 operating permit for Sinclair- Carrollton, does not adequately justify how the monitoring conditions in Permit Condition PW001 ensure the 10/25 tons of HAPs emission limit, intended to restrict Sinclair-Carrollton PTE, is enforceable as a practical matter. Therefore, in order to ensure that the unit specific emission limits, intended to restrict PTE, are enforceable as a practical matter, MDNR is encouraged to ensure the final permit clearly states or demonstrates how Sinclair-Carrollton will calculate actual HAP emissions to demonstrate compliance with the HAP emission limits from the storage, transfer and handling including fugitives.

Additionally, Attachment E includes two (2) notations: one requires the permittee to record the product and the period of storage for each petroleum product stored in Tanks #3212; and the second requires that whenever any product with a maximum true vapor pressure of 2: 3.5 kPa (0.51 psia) is stored, record the maximum liquid storage temperature and maximum true vapor pressure during the storage period.

Attachment E does not currently provide for the recording of either maximum liquid storage temperature and maximum true vapor and these two notes do not appear to be directly related to the recording of HAP emissions.

Response to Comment:

HAPs tracking has been removed from the operating permit due to the HAP PTE being below the 10/25 limitation. Throughout the permitting history of the facility, the HAP PTE has always been below the 10/25 limitation.

For this reason and with the current HAP PTE also being below the 10/25 limitation, the limitation and tracking sheet have been removed from the operating permit.

Comment 2:

Also, Permit Condition 7 establishes a voluntary limit of less than 5 tons of volatile organic compounds (VOC) from the operation of the portable air stripper during any consecutive 12-month period. Permit Condition 7 also requires the permittee to count any hazardous air pollutant (HAP) toward total required to document compliance with Permit Condition PW001. However, Permit Condition 7 does not detail the process by which the permittee calculates the VOC and HAP emitted by the air stripper. As stated in detail above, Permit Condition 7 may not be enforceable as a practical matter. So EPA recommends MDNR might consider providing the details in Permit Condition 7 which describe how Sinclair- Carrollton determines both VOC and HAP emissions from the use of the portable air stripper.

Response to Comment:

Both Permit Condition 7 and Attachment F have been updated to better record the VOC emissions from the air stripper.

Response to EPA Comments

Two comments were received from Mark Smith, Air Permitting and Compliance Branch Chief of EPA Region 7 on October 13, 2017. The comments are addressed in the order in which they appear within the letter(s).

Comment 1:

EPA's public comment #1, submitted under cover dated August 3, 2017, encouraged MDNR to indicate how Sinclair-Carrollton calculates their actual HAP emissions to demonstrate compliance with the HAP emission limits from the storage, transfer and handling of materials, including fugitives. MDNR's response to this comment says, "HAP's tracking has been removed from the operating permit due to the HAP PTE being below the 10/25 limitation." MDNR's response goes on to say: "Throughout the permitting history of the facility, the HAP PTE has always been below the 10/25 limitation. For this reason and with the current HAP PTE also being below the 10/25 limitation, the limitation and tracking sheet have been removed from the operating permit."

Permit to Construct #1195-004A, issued May 29, 1996, includes Special Condition #3 which requires "the total emission level for any Hazardous Air Pollutant (HAP) or combined sum of HAPs from the entire Sinclair Carrollton Station to be less than 10 tons and 25 tons, respectively, in any consecutive 12-month period. This condition establishes an emissions cap on all HAP(s) sources at this installation." Special Condition #4, in Permit to Construct #1195-004A, requires that "monthly records shall be kept that are adequate to determine the emissions of HAPs from the installation. These records shall also indicate the total quantity of HAP emissions over the previous 12-month period." Additionally, the Review Summary (Statement of Basis), of Permit to Construct #1195-004A, indicates that "this entire installation is limited to 10 tons per year of any single HAP and less than 25 tons of combined HAPs. Therefore, National Emission Standards for Hazardous Air Pollutants (NESHAPs 40 CFR 63, Subpart R-National Emission Standards for Hazardous Air Pollutants for Source Categories: Gasoline Distribution (Stage 1) is not applicable to this installation." EPA is concerned with MDNR's response to EPA's public comment #1.

First, the approach indicated by MDNR, in their response, removes an applicable requirement included in Permit to Construct #1195-004A. This appears to conflict with the requirements of 10 CSR 10-6.065(6)(C)1 which requires that every operating permit issued shall contain all requirements applicable to the installation at the time of issuance. Also, 10 CSR 10-6.020(2)(A)54 B defines applicable requirements as any term or condition of any pre-construction permit issued.

Second, the removal of the requirement for Sinclair-Carrollton to track HAP emissions, eliminates a federally enforceable permit condition protecting Sinclair-Carrollton from the requirements of 40 CFR part 63, Subpart R: National Emission Standards for Hazardous Air Pollutants for Source categories: Gasoline Distribution (Stage 1). This protection appears to have been one of the reasons for including HAP tracking in Special Condition #3, of Permit to Construct #1195-004B.

Therefore; EPA strongly encourages MDNR review and reconsider their response to public comment #1.

Response to Comment:

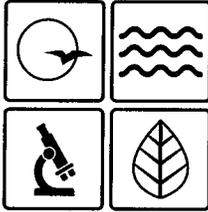
The limitation, monitoring, recordkeeping, and reporting requirements have been reinserted into the operating permit since the requirements are contained within a construction permit and therefore required to be included in the operating permit.

Comment 2:

Also, Section IV: Core Permit Requirements includes 10 CSR 10-6.250: Asbestos Abatement Projects-Certification, Accreditation, and Business Exemption Requirements. However, this MDNR rule does not appear to have been approved into the Missouri State Implementation Plan and therefore is a "State Only Requirements." EPA recommends MDNR indicate that 10 CSR 10-6.250 is "State Only" permit requirement.

Response to Comment:

This Core Permit Requirement has been updated to indicate that it is a state only requirement.



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

FEB 22 2018

Mr. Mark Petersen
Sinclair Transportation Company, Carrollton Products Terminal
26036 Old Highway 24
Carrollton, MO 64633

Re: Sinclair Transportation Company, Carrollton Products Terminal, 033-0001
Permit Number: OP2018-002

Dear Mr. Peterson:

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

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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:dbj

Enclosures

c: PAMS File: 2014-09-044



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