AIR EMISSION PERMIT NO. 01300017-007
Major Amendment

IS ISSUED TO

Magellan Midstream Partners LP

MAGELLAN PIPELINE CO LP - MANKATO
55199 State Highway 68
Mankato, Blue Earth County, MN 56001

The emission units, control equipment and emission stacks at the stationary source authorized in this permit amendment are described in the permit applications listed in the Permit Applications Table.

This permit amendment supersedes Air Emission Permit No. 01300017-006, and authorizes the Permittee to operate the stationary source at the address listed above unless otherwise noted in Table A. The Permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit are as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Unless otherwise indicated, all the Minnesota rules cited as the origin of the permit terms are incorporated into the SIP under 40 CFR § 52.1220 and as such as are enforceable by U.S. Environmental Protection Agency (EPA) Administrator or citizens under the Clean Air Act.

Permit Type: State; Limits to Avoid Part 70 and NSR

Operating Permit Issue Date: May 6, 1997

Major Amendment Issue Date: April 7, 2009

Expiration Date: Non-Expiring – All Title I Conditions do not expire.

Don Smith, P.E., Manager
Air Quality Permits Section
Industrial Division

for Paul Eger
Commissioner
Minnesota Pollution Control Agency

Permit Applications Table

Permit Type	Application Date	Permit Action
Total Facility Operating Permit	3/19/96 updated 11/8/96	001
Administrative Amendment	Agency Initiated	002
Major Amendment	12/28/01	003
Major Amendment	11/21/03	004
Administrative Amendment	12/30/04	005
Administrative Amendment	8/28/07	006
Major Amendment	8/19/08	007

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NOTICE TO THE PERMITTEE:

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

Metro Area	651-296-6300
Outside Metro Area	1-800-657-3864
TTY	651-282-5332

The rules governing these programs are contained in Minn. R. chs. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

Questions about this air emission permit or about air quality requirements can also be directed to the telephone numbers and address listed above.

PERMIT SHIELD:

Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Subject to the limitations of Minn. R. 7007.1800 and 7017.0100, subp. 2, notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

FACILITY DESCRIPTION:

Permit Action 001 (Total Facility Permit):

Magellan Pipeline Company, LLC (Permittee) owns and operates a bulk fuels storage and truck loading terminal (facility) in Mankato, Minnesota. The facility is fed by a pipeline and consists of a truck loading rack (EU 001) controlled by a vapor combustion unit (CE 001), petroleum product storage tanks, and soil vapor extraction units.

This facility meets the definition of *bulk gasoline terminal* as defined at 40 CFR Section 63.11100, and includes a gasoline loading rack with a daily throughput capacity in excess of 250,000 gallons.

Permit Action 002 (Administrative Amendment):

This action added loading rack performance testing as required by 40 CFR pt. 60, subp. XX.

Permit Action 003 (Major Amendment):

This action authorized the operation of a second air sparge and soil vapor extraction system (EU 003) with emissions controlled by an oxidizer (CE 002). The oxidizer is able to operate in both thermal and catalytic modes. Federally enforceable permit conditions on the oxidizer allow the facility to continue to avoid major source classification under the Prevention of Significant Deterioration (PSD) program.

Permit Action 004 (Major Amendment):

This permit action authorized a change in the monitoring requirements for CE 002. In addition, this permit action acknowledged the Permittee's installation of a third (uncontrolled) soil vapor extraction system (Soil Vapor Extraction Unit III) as described in a September 3, 2003, minor permit amendment application. However, no requirements apply to this unit and therefore this unit is not in the permit.

Permit Action 005 (Administrative Amendment):

This permit action changed the name of the facility to Magellan Pipeline Company, L.P. (previously Williams Pipe Line Company).

Permit Action 006 (Administrative Amendment):

This permit action is for a 120-day administrative test extension for the vapor combustion unit (VCU) (a.k.a. Truck Loading Rack, EU 001/SV 001) in accordance with Minn. R. 7007.1400, subp. 1(H).

AMENDMENT DESCRIPTION:

This permit amendment revises the requirement to operate the oxidizer (CE 002) for Soil Vapor Extraction II and II-E (EU 003) by placing a 16.0 tons per year VOC limit (12-month rolling sum basis) on EU 003 and allowing the Permittee to not operate CE 002 until EU 003 uncontrolled VOC emissions are 14.4 tpy. Once the actual 12-month rolling sum VOC emissions reach 14.4 tpy, the Permittee is required to operate CE 002 until the actual 12-month rolling sum EU 003 VOC emissions are reduced below 14.4 tpy.

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Magellan Pipeline Co LP - Mankato

Permit Number: 01300017 - 007

Table A contains limits and other requirements with which your facility must comply. The limits are located in the first column of the table (What To do). The limits can be emission limits or operational limits. This column also contains the actions that you must take and the records you must keep to show that you are complying with the limits. The second column of Table A (Why to do it) lists the regulatory basis for these limits. Appendices included as conditions of your permit are listed in Table A under total facility requirements.

Subject Item: **Total Facility**

What to do	Why to do it
OPERATIONAL REQUIREMENTS	hdr
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
No owner or operator shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard.	40 CFR Section 60.12; Minn. R. 7011.0050
Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020
Inspections: Upon presentation of credentials and other documents as may be required by law, allow the Agency, or its representative, to enter the Permittee's premises, to have access to and copy any records required by this permit, to inspect at reasonable times (which include any time the source is operating) any facilities, equipment, practices or operations, and to sample or monitor any substances or parameters at any location.	Minn. R. 7007.0800, subp. 9(A)
Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate.	Minn. R. 7019.1000, subp. 4
Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150.	Minn. R. 7011.0150
The Permittee shall comply with National Primary and Secondary Ambient Air Quality Standards, 40 CFR pt. 50, and the Minnesota Ambient Air Quality Standards, Minn. R. 7009.0010 to 7009.0080. Compliance shall be demonstrated upon written request by the MPCA.	40 CFR pt. 50; Minn. Stat. Section 116.07, subds. 4a & 9; Minn. R. 7007.0100, subps. 7A, 7L & 7M; Minn. R. 7007.0800, subps. 1, 2 & 4; Minn. R. 7009.0010-7009.0080
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not federally enforceable.	Minn. R. 7030.0010 - 7030.0080
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
PERFORMANCE TESTING	hdr
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A and/or B.	Minn. R. ch. 7017
Performance Test Notifications and Submittals: Performance Tests are due as outlined in Table A of the permit. See Table B for additional testing requirements. Performance Test Notification (written): due 30 days before each Performance Test Performance Test Plan: due 30 days before each Performance Test Performance Test Pre-test Meeting: due 7 days before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 days after each Performance Test The Notification, Test Plan, and Test Report may be submitted in alternative format as allowed by Minn. R. 7017.2018.	Minn. R. 7017.2018; Minn. R. 7017.2030, subps. 1-4, Minn. R. 7017.2035, subps. 1-2
MONITORING REQUIREMENTS	hdr

Facility Name: Magellan Pipeline Co LP - Mankato

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Operation of Monitoring Equipment: Unless otherwise noted in Tables A and/or B, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.	Minn. R. 7007.0800, subp. 4(D)
Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).	Minn. R. 7007.0800, subp. 4(D)
RECORDKEEPING	hdr
Recordkeeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007.1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350, subp. 2), including records of the emissions resulting from those changes.	Minn. R. 7007.0800, subp. 5(B)
Recordkeeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).	Minn. R. 7007.0800, subp. 5(C)
Recordkeeping: Maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the facility including; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.	40 CFR Section 60.7(b), Minn. R. 7019.0100, subp. 1
When the Permittee determines that no permit amendment or notification is required prior to making a change, the Permittee must retain records of all calculations required under Minn. R. 7007.1200. For expiring permits, these records shall be kept for a period of five years from the date the change was made or until permit reissuance, whichever is longer. For nonexpiring permits, these records shall be kept for a period of five years from the date that the change was made. The records shall be kept at the stationary source for the current calendar year of operation and may be kept at the stationary source or office of the stationary source for all other years. The records may be maintained in either electronic or paper format.	Minn. R. 7007.1200, subp. 4
Recordkeeping: Maintain a file of all measurements, maintenance, reports and records for at least five years.	Minn. R. 7007.0800, subp. 5(C); meets requirements of 40 CFR Section 60.7(f)
REPORTING/SUBMITTALS	hdr
Notification of any physical or operational change which increases emission rate: due 60 days (or as soon as practical) before the change is commenced.	40 CFR Section 60.7(a)(4); Minn. R. 7019.0100, subp. 1
Oral Notification of Deviations Endangering Human Health or the Environment: Within 24 hours of discovery, orally notify the Commissioner of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7007.0800, subp. 6(A)
Discovery of Deviations Endangering Human Health or the Environment Report (written): within two working days after discovery of deviation, submit a written description of any deviation endangering human health or the environment to the Commissioner. Include the following information in this written description: cause of the deviation; exact dates of the period of the deviation; if the deviation has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7007.0800, subp. 6(A)
Breakdowns: Notify the Commissioner immediately of a breakdown of more than one hour duration of any process or control equipment if the breakdown causes an increase in the emission of air contaminants, or as required by Minn. R. 7019.1000 as amended. At the time of notification or as soon thereafter as possible, the permittee shall also notify the Commissioner of the cause of the breakdown and the estimated duration. Notify the Commissioner again when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Shutdowns: Notify the Commissioner at least 24 hours in advance of shutdown of any process or control equipment if the shutdown would cause an increase in the emission of air contaminants. At the time of notification, notify the Commissioner of the cause of the shutdown and the estimated duration. Notify the Commissioner again when the shutdown is over.	Minn. R. 7019.1000, subp. 1
Application for Permit Amendment: If you need a permit amendment, submit application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Extension Requests: The permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)

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Emission Inventory Report: due on or before April 1 of each calendar year following permit issuance. Submit the report on a form approved by the Commissioner.	Minn. R. 7019.3000 through Minn. R. 7019.3010
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095

Facility Name: Magellan Pipeline Co LP - Mankato

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Subject Item: **GP 001 Storage Tanks**

Associated Items: TK 001 Diesel; Tank 582

TK 002 Diesel; Tank 583

TK 003 Diesel; Tank 584

TK 004 Ethanol; Tank 585

TK 005 Diesel; Tank 586

TK 006 Regular Gasoline; Tank 1322

TK 007 #2 Fuel Oil; Tank 1323

TK 008 Regular Gasoline; Tank 1324

TK 009 Premium Gasoline; Tank 1325

TK 010 #2 Fuel Oil; Tank 1382

TK 011 Regular Gasoline; Tank 1383

TK 012 Regular Gasoline; Tank 1384

TK 013 #1 Fuel Oil; Tank 6008

TK 014 #1 Fuel Oil; Tank 6009

TK 015 #1 Fuel Oil; Tank 6010

TK 016 #2 Fuel Oil; Tank 6011

TK 017 #2 Fuel Oil; Tank 6012

TK 018 Relief Tank 186

TK 019 Biodiesel; Tank 183

What to do	Why to do it
The Permittee shall meet all applicable requirements at 40 CFR Section 63.11087 for facility tanks that store gasoline.	40 CFR Section 63.11087

Facility Name: Magellan Pipeline Co LP - Mankato

Permit Number: 01300017 - 007

Subject Item: **GP 002 Sources subject to Part 63, Subpart BBBBBB**

Associated Items: CE 001 Vapor Combustion Unit

EU 001 Truck Loading Rack

FS 001 Gasoline Service - Valves, Flanges, Pumps, Connectors

TK 006 Regular Gasoline; Tank 1322

TK 008 Regular Gasoline; Tank 1324

TK 009 Premium Gasoline; Tank 1325

TK 011 Regular Gasoline; Tank 1383

TK 012 Regular Gasoline; Tank 1384

What to do	Why to do it
APPLICABILITY AND EQUIPMENT REQUIREMENTS Note: The MPCA has not and has no intention of taking delegation of part 63, subp. BBBBBB. All submittals required under GP 002 must be sent to the EPA Administrator. Refer to Table B for the mailing address for these submittals.	hdr
This facility is an existing bulk gasoline terminal as defined at 40 CFR Sections 63.11100 and 63.11083(d) that is not subject to the control requirements of 40 CFR part 63, subpart R or 40 CFR part 63, subpart CC, and therefore is subject to part 63, subpart BBBBBB. The Permittee shall comply with the following standards in 40 CFR part 63, subpart BBBBBB no later than January 10, 2011.	40 CFR Sections 63.11081(a)(1), 63.11082(d), and 63.11083(b)
For each gasoline storage tank with a capacity of greater than or equal to 75 cubic meters (19,813 gallons), the Permittee must: (b) Equip each internal floating roof gasoline storage tank according to the requirements in 40 CFR Section 60.112b(a)(1), except for the secondary seal requirements under 40 CFR Section 60.112b(a)(1)(ii)(B) and the requirements in 40 CFR Section 60.112b(a)(1)(iv) through (ix); and (c) Equip each external floating roof gasoline storage tank according to the requirements in 40 CFR Section 60.112b(a)(2), except that the requirements of 40 CFR Section 60.112b(a)(2)(ii) shall only be required if such storage tank does not currently meet the requirements of 40 CFR Section 60.112b(a)(2)(i), or (continued below)	40 CFR Section 63.11087(a) and Table 1 of part 63, subp. BBBBBB
(d) Equip and operate each internal and external floating roof gasoline storage tank according to the applicable requirements in Section 63.1063(a)(1) and (b), and equip each external floating roof gasoline storage tank according to the requirements of Section 63.1063(a)(2) if such storage tank does not currently meet the requirements of Section 63.1063(a)(1).	40 CFR Section 63.11087(a) and Table 1 of part 63, subp. BBBBBB
For EU 001 the Permittee must: (a) Equip EU 001 with a vapor collection system designed to collect the TOC vapors displaced from cargo tanks during product loading; (b) Reduce emissions of TOC to less than or equal to 80 mg/l of gasoline loaded into gasoline cargo tanks at the loading rack; and (d) Limit the loading of gasoline into gasoline cargo tanks that are vapor tight using the procedures specified in 40 CFR Section 60.502(e) through (j). For the purposes of this item, the term "tank truck" as used in 40 CFR Section 60.502(e) through (j) means "cargo tank" as defined in 40 CFR Section 63.11100.	40 CFR Section 63.11088(a) and Table 2 of part 63, subp. BBBBBB
INSPECTION REQUIREMENTS	hdr
Monthly Leak Inspections: The Permittee shall perform a monthly leak inspection of all equipment in gasoline service, as defined in 40 CFR Section 63.11100. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. 40 CFR Section 63.11100 defines 'in gasoline service' as a piece of equipment used in a system that transfers gasoline or gasoline vapors and 'monthly' as once per calendar month at regular intervals of no less than 28 days and no more than 35 days.	40 CFR Sections 63.11089(a) and 63.11100

Leak Inspection Recordkeeping: A log book shall be used and shall be signed by the Permittee at the completion of each inspection. A section of the log book shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility.	40 CFR Section 63.11089(b)
Leak Detection Recordkeeping: Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak, except as provided in 40 CFR Section 63.11089(d).	40 CFR Section 63.11089(c)
Delay of Equipment Leak Repair: Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The Permittee shall provide in the semiannual Excess Emissions Report specified in 40 CFR Section 63.11095(b), the reason(s) why the repair was not feasible and the date each repair was completed.	40 CFR Section 63.11089(d)
TESTING AND MONITORING REQUIREMENTS	hdr
(a) The Permittee must comply with the requirements in paragraphs (a) through (d) of Section 63.11092. (a)(1) Conduct a performance test on the vapor processing and collection systems according to either paragraph (a)(1)(i) or paragraph (a)(1)(ii) of Section 63.11092. (i) Use the test methods and procedures in Section 60.503 of this chapter, except a reading of 500 parts per million shall be used to determine the level of leaks to be repaired under Section 60.503(b) of this chapter. (ii) Use alternative test methods and procedures in accordance with the alternative test method requirements in Section 63.7(f).	40 CFR Section 63.11092(a)
(a)(3) The Permittee conducted a performance test on CE 001 for total organic compound emissions on October 2, 2007 and will submit the results of the October 2, 2007 testing to the Administrator in lieu of the initial compliance test required under Section 63.11092(a)(1), as allowed by Section 63.11092(a)(3). Should the Administrator deem the October 2, 2007 test data unacceptable, the Permittee is still required to meet the requirement to conduct an initial performance test within 180 days of the compliance date specified in Section 63.11083.	40 CFR Section 63.11092(a)(3)
(b) For each performance test conducted under Section 63.11092(a)(1), the owner or operator shall determine a monitored operating parameter value for the vapor processing system using the procedures specified in Section 63.11092(b)(1) through (5).	40 CFR Section 63.11092(b)
(1) CE 001 shall be equipped with 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.	40 CFR Section 63.11092(b)(1)(iii)(B)
(2) Develop and submit to the Administrator a monitoring and inspection plan that describes the Permittee's approach for meeting the requirements in Section 63.11092(b)(1)(iii)(B)(2)(i) through (v). (i) CE 001 shall be equipped to automatically prevent gasoline loading operations from beginning at any time that the pilot flame is absent. (ii) The Permittee shall verify, during each day of operation of EU 001, 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. (iii) The Permittee shall perform semi-annual preventive maintenance inspections of CE 001 according to the recommendations of the CE 001 manufacturer. (continued below)	40 CFR Section 63.11092(b)(1)(iii)(B)(2)
(iv) The monitoring plan developed under Section 63.11092(b)(1)(iii)(B)(2) shall: - specify conditions that would be considered CE 001 malfunctions during the inspections or automated monitoring performed under Section 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.	40 CFR Section 63.11092(b)(1)(iii)(B)(2)

(v) The Permittee shall document any CE 001 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.	40 CFR Section 63.11092(b)(1)(iii)(B)(2)
(5) The Permittee has chosen to comply with the performance testing alternative provided under Section 63.11092(a)(3) in lieu of the performance test required under Section 63.11092(a)(1). Therefore, the monitored operating parameter value may be determined according to the provisions of Section 63.11092(b)(5)(i). (i) Monitor presence of a pilot flame as specified in this operating permit. At the time that the administrator requires another performance test, the Permittee must determine the monitored operating parameter value according to the requirements specified Section 63.11092(b).	40 CFR Section 63.11092(b)(5)
The Permittee shall maintain presence of a pilot flame at all times that emissions are vented to CE 001. Failure to maintain presence of a pilot flame in CE 001 when venting emissions to CE 001 shall constitute a violation of the emission standard in Section 63.11088(a), except as specified in paragraph (d)(4) of Section 63.11092.	40 CFR Section 63.11092(d)(2) and (d)(3)
(4) For the monitoring and inspection, as required under Section 63.11092(b)(1)(iii)(B)(2), malfunctions that are discovered shall not constitute a violation of the emission standard in Section 63.11088(a) if corrective actions as described in the monitoring and inspection plan are followed. The Permittee must: (i) Initiate corrective action to determine the cause of the problem within 1 hour; (ii) Initiate corrective action to fix the problem within 24 hours; (iii) Complete all corrective actions needed to fix the problem as soon as practicable consistent with good air pollution control practices for minimizing emissions; (iv) Minimize periods of start-up, shutdown, or malfunction; and (v) Take any necessary corrective actions to restore normal operation and prevent the recurrence of the cause of the problem.	40 CFR Section 63.11092(d)(4)
For each gasoline storage tank equipped with an internal floating roof, the Permittee must perform inspections of the floating roof system according to: 1. the requirements of Section 60.113b(a) if complying with option 2(b) in Table 1 in part 63, subpart BBBBBB, or 2. the requirements of Section 63.1063(c)(1) if complying with option 2(d) in Table 1 inn part 63, subpart BBBBBB.	40 CFR Section 63.11092(e)(1)
The annual certification test for each gasoline cargo tank shall consist of the test methods specified in 40 CFR Section 63.11092(f)(1). (1) EPA Method 27, Appendix A-8, 40 CFR part 60. Conduct the test using a time period (t) for the pressure and vacuum tests of 5 minutes. The initial pressure (Pi) for the pressure test shall be 460 millimeters (mm) of water (18 inches of water), gauge. The initial vacuum (Vi) for the vacuum test shall be 150 mm of water (6 inches of water), gauge. The maximum allowable pressure and vacuum changes (delta p, delta v) for all affected gasoline cargo tanks is 3 inches of water, or less, in 5 minutes.	40 CFR Section 63.11092(f)(1)
RECORDKEEPING	hdr
The Permittee shall keep records as specified in 40 CFR Section 60.115b, except records shall be kept for at least 5 years.	40 CFR Section 63.11094(a)

The Permittee shall keep records of the test results for each gasoline cargo tank loading at the facility as specified below: (1) Annual certification testing performed under 40 CFR Section 63.11092(f)(1). (2) The documentation file shall be kept up-to-date for each gasoline cargo tank loading at the facility. The documentation for each test shall include, as a minimum, the following information: (i) Name of test: Annual Certification Test-Method 27 (ii) Cargo tank owner's name and address (iii) Cargo tank identification number (iv) Test location and date (v) Tester name and signature (vi) Witnessing inspector, if any: Name, signature, and affiliation (vii) Vapor tightness repair: Nature of repair work and when performed in relation to vapor tightness testing (viii) Test results: Test pressure; pressure or vacuum change, mm of water; time period of test; number of leaks found with instrument; and leak definition.	40 CFR Section 63.11094(b)
(d) Each owner or operator subject to the equipment leak provisions of Section 63.11089 shall prepare and maintain a record describing the types, identification numbers, and locations of all equipment in gasoline service. For facilities electing to implement an instrument program under Section 63.11089, the record shall contain a full description of the program.	40 CFR Section 63.11094(d)
The Permittee shall record in the log book for each leak that is detected the information specified below: (1) The equipment type and identification number. (2) The nature of the leak (i.e. vapor or liquid) and the method of detection (i.e. sight, sound, or smell). (3) The date the leak was detected and the date of each attempt to repair the leak. (4) Repair methods applied in each attempt to repair the leak. (5) A statement of: Repair Delayed and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak. (6) The expected date of successful repair of the leak if the leak is not repaired within 15 days. (7) The date of successful repair of the leak.	40 CFR Section 63.11094(e)
The Permittee shall: (1) Keep an up-to-date, readily accessible record of the continuous monitoring data required under 40 CFR Section 63.11092(b) or 63.11092(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. The date and time of day shall also be indicated at reasonable intervals on this record. (2) Record and report simultaneously with the Notification of Compliance Status required under 40 CFR Section 63.11093(b) all data and calculations, engineering assessments, and manufacturer's recommendations used in determining the operating parameter value under 40 CFR Section 63.11092(b) or 63.11092(e). (3) Keep an up-to-date, readily accessible copy of the monitoring and inspection plan required under 40 CFR Section 63.11092(b)(1)(i)(B)(2) or (iii)(B)(2).	40 CFR Section 63.11094(f)

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(continued from above) (4) Keep an up-to-date, readily accessible record of all system malfunctions, as specified in 40 CFR Section 63.11092(b)(1)(i)(B)(2)(v) or (iii)(B)(2)(v). (5) If a Permittee requests approval to use a vapor processing system or monitor an operating parameter other than those specified in 40 CFR Section 63.11092(b), the Permittee shall submit a description of planned reporting and recordkeeping procedures.	40 CFR Section 63.11094(f)
REPORTING	hdr
The Permittee shall submit the following in a semiannual compliance report to the administrator: 1) For storage vessels complying with option 2(b) in Table 1 of 40 CFR pt. 63, subp. BBBBBB, the information specified in 40 CFR Section 60.115b(a), 60.115b(b), or 60.115b(c), depending upon the control equipment installed; 2) For loading racks, each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility; and 3) For equipment leak inspections, the number of equipment leaks not repaired within 15 days after detection.	40 CFR Section 63.11095(a)
For any 6-month period during which an excess emission event has occurred, the Permittee shall submit a semiannual excess emissions (EER) report to the Administrator with the semiannual compliance report. Excess emissions events, and the information to be included in the excess emissions report, are as follows: (1) Each instance of a non-vapor-tight gasoline cargo tank loading at the facility 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. (2) Each reloading of a non-vapor-tight gasoline cargo tank at the facility before vapor tightness documentation for that cargo tank is obtained by the facility in accordance with 40 CFR Section 63.11094(b). If no excess emission events have occurred during the previous 6-month period, no EER is required.	40 CFR Section 63.11095(b) and (c)
(continued from above) (3) Each exceedance or failure to maintain, as appropriate, the monitored operating parameter value determined under 40 CFR Section 63.11092(b). The report shall include the monitoring data for the days on which exceedances or failures to maintain have occurred, and a description and timing of the steps taken to repair or perform maintenance on the vapor collection and processing systems or the CMS. (4) Each instance in which malfunctions discovered during the monitoring and inspections required under 40 CFR Section 63.11092(b)(1)(i)(B)(2) and (iii)(B)(2) were not resolved according to the necessary corrective actions described in the monitoring and inspection plan. The report shall include a description of the malfunction and the timing of the steps taken to correct the malfunction.	40 CFR Section 63.11095(b)
(continued from above) (5) 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.	40 CFR Section 63.11095(b)
APPLICABLE GENERAL PROVISIONS	hdr

Section 63.2 Definitions in addition to those in Section 63.11100. Section 63.3 Units and Abbreviations Section 63.4 Prohibited Activities and Circumvention - Prohibited activities; circumvention, severability Section 63.5 Construction/Reconstruction - Applicability; applications; approvals Section 63.6(a) Compliance with Standards/Operation & Maintenance Applicability - General Provisions apply unless compliance extension; General Provisions apply to area sources that become major Section 63.6(b)(1)-(4) Compliance Dates for New and Reconstructed Sources - Standards apply at effective date; 3 years after effective date; upon startup; 10 years after construction or reconstruction commences for CAA section 112(f) Section 63.6(b)(5) Notification - Must notify if commenced construction or reconstruction after proposal	40 CFR Section 63.11098 and Table 3 part 63, subp. BBBBBB
Section 63.6(e)(1) Operation & Maintenance - Operate to minimize emissions at all times; correct malfunctions as soon as practicable; and operation and maintenance requirements independently enforceable; information Administrator will use to determine if operation and maintenance requirements were met Section 63.6(f)(2)-(3) Methods for Determining Compliance - Compliance based on performance test, operation and maintenance plans, records, inspection Section 63.6(g)(1)-(3) Alternative Standard - Procedures for getting an alternative standard Section 63.6(i)(1)-(14) Compliance Extension - Procedures and criteria for Administrator to grant compliance extension Section 63.6(j) Presidential Compliance Exemption - President may exempt any source from requirement to comply with this subpart Section 63.7(a)(2) Performance Test Dates - Dates for conducting initial performance testing; must conduct 180 days after compliance date	40 CFR Section 63.11098 and Table 3 part 63, subp. BBBBBB
Section 63.7(a)(3) Section 114 Authority - Administrator may require a performance test under CAA section 114 at any time Section 63.7(b)(1) Notification of Performance Test - Must notify Administrator 60 days before the test Section 63.7(b)(2) Notification of Re-scheduling - If have to reschedule performance test, must notify Administrator of rescheduled date as soon as practicable and without delay Section 63.7(c) Quality Assurance (QA)/Test Plan - Requirement to submit site-specific test plan 60 days before the test or on date Administrator agrees with; test plan approval procedures; performance audit requirements; internal and external QA procedures for testing Section 63.7(d) Testing Facilities - Requirements for testing facilities Section 63.7(e)(1) Conditions for Conducting Performance Tests - Performance tests must be conducted under representative conditions; cannot conduct performance tests during SSM	40 CFR Section 63.11098 and Table 3 part 63, subp. BBBBBB

Section 63.7(e)(2) Conditions for Conducting Performance Tests - Must conduct according to this subpart and EPA test methods unless Administrator approves alternative Section 63.7(e)(3) Test Run Duration - Must have three test runs of at least 1 hour each; compliance is based on arithmetic mean of three runs; conditions when data from an additional test run can be used Section 63.7(f) Alternative Test Method - Procedures by which Administrator can grant approval to use an intermediate or major change, or alternative to a test method Section 63.7(g) Performance Test Data Analysis - Must include raw data in performance test report; must submit performance test data 60 days after end of test with the notification of compliance status; keep data for 5 years Section 63.7(h) Waiver of Tests - Procedures for Administrator to waive performance test Section 63.8(a)(1) Applicability of Monitoring Requirements - Subject to all monitoring requirements in standard	40 CFR Section 63.11098 and Table 3 part 63, subp. BBBBBB
Section 63.8(a)(2) Performance Specifications - Performance specifications in appendix B of 40 CFR part 60 apply Section 63.8(a)(4) Monitoring of Flares - Monitoring requirements for flares in Section 63.11 apply Section 63.8(b)(1) Monitoring - Must conduct monitoring according to standard unless Administrator approves alternative Section 63.8(b)(2)-(3) Multiple Effluents and Multiple Monitoring Systems - Specific requirements for installing monitoring systems; must install on each affected source or after combined with another affected source before it is released to the atmosphere provided the monitoring is sufficient to demonstrate compliance with the standard; if more than one monitoring system on an emission point, must report all monitoring system results, unless one monitoring system is a backup	40 CFR Section 63.11098 and Table 3 part 63, subp. BBBBBB
Section 63.8(c)(1) Monitoring System Operation and Maintenance - Maintain monitoring system in a manner consistent with good air pollution control practices Section 63.8(c)(1)(i)-(iii) Routine and Predictable SSM - Follow the SSM plan for routine repairs; keep parts for routine repairs readily available; reporting requirements for SSM when action is described in SSM plan Section 63.8(c)(2)-(8) CMS Requirements - Must install to get representative emission or parameter measurements; must verify operational status before or at performance test Section 63.8(e) CMS Performance Evaluation - Notification, performance evaluation test plan, reports Section 63.8(f)(1)-(5) Alternative Monitoring Method - Procedures for Administrator to approve alternative monitoring Section 63.8(f)(6) Alternative to Relative Accuracy Test -Procedures for Administrator to approve alternative relative accuracy tests for CEMS	40 CFR Section 63.11098 and Table 3 part 63, subp. BBBBBB
Section 63.8(g) Data Reduction - COMS 6-minute averages calculated over at least 36 evenly spaced data points; CEMS 1 hour averages computed over at least 4 equally spaced data points; data that cannot be used in average Section 63.9(a) Notification Requirements - Applicability and State delegation Section 63.9(b)(1)-(2), (4)-(5) Initial Notifications - Submit notification within 120 days after effective date; notification of intent to construct/reconstruct, notification of commencement of construction/reconstruction, notification of startup; contents of each Section 63.9(c) Request for Compliance Extension - Can request if cannot comply by date or if installed best available control technology or lowest achievable emission rate Section 63.9(d) Notification of Special Compliance Requirements for New Sources - For sources that commence construction between proposal and promulgation and want to comply 3 years after effective date	40 CFR Section 63.11098 and Table 3 part 63, subp. BBBBBB

Section 63.9(a) Notification Requirements - Applicability and State delegation Section 63.9(b)(1)-(2), (4)-(5) Initial Notifications - Submit notification within 120 days after effective date; notification of intent to construct/reconstruct, notification of commencement of construction/reconstruction, notification of startup; contents of each Section 63.9(c) Request for Compliance Extension - Can request if cannot comply by date or if installed best available control technology or lowest achievable emission rate Section 63.9(d) Notification of Special Compliance Requirements for New Sources - For sources that commence construction between proposal and promulgation and want to comply 3 years after effective date	40 CFR Section 63.11098 and Table 3 part 63, subp. BBBBBB
Section 63.9(e) Notification of Performance Test - Notify Administrator 60 days prior Section 63.9(g) Additional Notifications When Using CMS - Notification of performance evaluation; notification about use of COMS data; notification that exceeded criterion for relative accuracy alternative (however, there are no opacity standards) Section 63.9(h)(1)-(6) Notification of Compliance Status - Contents due 60 days after end of performance test or other compliance demonstration, except for opacity/VE, which are due 30 days after; when to submit to Federal vs. State authority (however, there are no opacity standards) Section 63.9(i) Adjustment of Submittal Deadlines - Procedures for Administrator to approve change when notifications must be submitted Section 63.9(j) Change in Previous Information - Must submit within 15 days after the change	40 CFR Section 63.11098 and Table 3 part 63, subp. BBBBBB
Section 63.9(g) Additional Notifications When Using CMS - Notification of performance evaluation; notification about use of COMS data; notification that exceeded criterion for relative accuracy alternative, however, there are no opacity standards Section 63.9(h)(1)-(6) Notification of Compliance Status - Contents due 60 days after end of performance test or other compliance demonstration, except for opacity/VE, which are due 30 days after; when to submit to Federal vs. State authority, however, there are no opacity standards Section 63.9(i) Adjustment of Submittal Deadlines - Procedures for Administrator to approve change when notifications must be submitted Section 63.9(j) Change in Previous Information - Must submit within 15 days after the change	40 CFR Section 63.11098 and Table 3 part 63, subp. BBBBBB
Section 63.10(a) Recordkeeping/Reporting - Applies to all, unless compliance extension; when to submit to Federal vs. State authority; procedures for owners of more than one source Section 63.10(b)(1) Recordkeeping/Reporting - General requirements; keep all records readily available; keep for 5 years Section 63.10(b)(2)(i)-(iv) Records Related to SSM - Occurrence of each for operations (process equipment); occurrence of each malfunction of air pollution control equipment; maintenance on air pollution control equipment; actions during SSM Section 63.10(b)(2)(vi)-(xi) CMS Records - Malfunctions, inoperative, out-of-control periods Section 63.10(b)(2)(xii) Records - Records when under waiver Section 63.10(b)(2)(xiii) Records - Records when using alternative to relative accuracy test	40 CFR Section 63.11098 and Table 3 part 63, subp. BBBBBB

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Section 63.10(b)(2)(xiv) Records - All documentation supporting initial notification and notification of compliance status Section 63.10(b)(3) Records - Applicability determinations Section 63.10(d)(1) General Reporting Requirements - Requirement to report Section 63.10(d)(2) Report of Performance Test Results - When to submit to Federal or State authority Section 63.10(d)(4) Progress Reports - Must submit progress reports on schedule if under compliance extension Section 63.10(d)(5) SSM Reports - Contents and submission Section 63.10(e)(3)(i)-(iii) Reports - Schedule for reporting excess emissions; note that Section 63.11095 specifies excess emission events for pt. 63, subp. BBBBBB	40 CFR Section 63.11098 and Table 3 part 63, subp. BBBBBB
Section 63.10(e)(3)(iv)-(v) Excess Emissions Reports - Requirement to revert to quarterly submission if there is an excess emissions and parameter monitor exceedances (now defined as deviations); provision to request semiannual reporting after compliance for 1 year; submit report by 30th day following end of quarter or calendar half; if there has not been an exceedance or excess emissions (now defined as deviations), report contents in a statement that there have been no deviations; must submit report containing all of the information in Sections 63.8(c)(7)-(8) and 63.10(c)(5)-(13); Section 63.11095 specifies excess emission events for pt. 63, subp. BBBBBB Section 63.10(e)(3)(vi)-(viii) Excess Emissions Report and Summary Report - Requirements for reporting excess emissions for CMS; requires all of the information in Sections 63.8(c)(7)-(8) and 63.10(c)(5)-(13)	40 CFR Section 63.11098 and Table 3 part 63, subp. BBBBBB
Section 63.10(e)(4) Reporting COMS Data - Must submit COMS data with performance test data Section 63.10(f) Waiver for Recordkeeping/Reporting - Procedures for Administrator to waive Section 63.11(b) Flares - Requirements for flares; the section references Section 63.11(b) Section 63.12 Delegation - State authority to enforce standards Section 63.13 Addresses - Addresses where reports, notifications, and requests are sent Section 63.14 Incorporations by Reference - Test methods incorporated by reference Section 63.15 Availability of Information - Public and confidential information	40 CFR Section 63.11098 and Table 3 part 63, subp. BBBBBB

Facility Name: Magellan Pipeline Co LP - Mankato

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Subject Item: **EU 001 Truck Loading Rack**

Associated Items: CE 001 Vapor Combustion Unit

GP 002 Sources subject to Part 63, Subpart BBBBBB

SV 001 Loading Rack VCU Stack

What to do	Why to do it
Total Organic Compounds: less than or equal to 35 milligrams/liter of gasoline loaded.	40 CFR Section 60.502(b); Minn. R. 7011.1550
Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline trucks using the following procedures. The Permittee shall: 1. Obtain the vapor tightness documentation described in Section 60.505(b) for each gasoline tank truck which is to be loaded at the facility. 2. Require the tank identification number to be recorded as each gasoline tank truck is loaded at the facility. 3. Cross-check each tank identification number with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded. 4. Notify the owner or operator of each nonvapor-tight gasoline tank truck loaded at the facility within 3 weeks after the loading has occurred. 5. Take steps assuring that the nonvapor-tight gasoline tank truck will not be reloaded at the facility until vapor tightness documentation for that tank is obtained. 6. Alternate procedures may be used upon application to, and approval by, the Administrator.	40 CFR Section 60.502(e); Minn. R. 7011.1550
The Permittee shall act to assure that loadings of gasoline tank trucks at the facility are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.	40 CFR Section 60.502(f); Minn. R. 7011.1550
The Permittee shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the affected facility. This includes training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks.	40 CFR Section 60.502(g); Minn. R. 7011.1550
A pressure measurement device capable of measuring up to 500 mm of water gauge pressure with +/- 2.5 mm of water precision, shall be calibrated and installed on the terminal's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline tank truck.	40 CFR Section 60.503(d)(1); Minn. R. 7011.1550
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 40 CFR Section 60.503(d).	40 CFR Section 60.502(h); Minn. R. 7011.1550
No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water.)	40 CFR Section 60.502(i); Minn. R. 7011.1550
Inspection: Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this requirement, detection methods incorporating sight, sound, or smell are acceptable.	40 CFR Section 60.502(j); Minn. R. 7011.1550
Recordkeeping and Repair: Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.	40 CFR Section 60.502(j); Minn. R. 7011.1550
The tank truck vapor tightness documentation shall be kept on file at the terminal in a permanent form available for inspection.	40 CFR Section 60.505(a); Minn. R. 7011.1550
The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27.	40 CFR Section 60.505(b); Minn. R. 7011.1550
A record of each monthly leak inspection required by Section 60.502(j) shall be kept on file at the terminal for at least five years and shall include, at a minimum: 1. Date of inspection 2. Findings (no leaks, or nature and severity of leaks) 3. Leak determination method 4. Corrective action (date each leak repaired, reasons for repair interval greater than 15 days) 5. Inspector name and signature	Minn. R. 7007.0800, subp. 5; meets requirements of 40 CFR Section 60.505(c); Minn. R. 7011.1550
The permittee shall keep documentation of all notifications required under Section 60.502(e)(4) on file at the terminal for at least five years.	Minn. R. 7007.0800, subp. 5; meets requirements of 40 CFR Section 60.505(d); Minn. R. 7011.1550
The Permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least five years.	Minn. R. 7007.0800, subp. 5; meets requirements of 40 CFR Section 60.505(f); Minn. R. 7011.1550

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Performance Test: due before 09/19/2010 for SV 001 total organic compound emissions. Testing shall be conducted in accordance with the requirements of 40 CFR Section 60.503.	Minn. R. 7017.2020, subp. 1
Pre-Test Leak Check: Immediately before the performance test required by this permit, use Method 21 to monitor for leakage of vapor from all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. Repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.	Minn. R. 7017.2020, subp. 1

Facility Name: Magellan Pipeline Co LP - Mankato

Permit Number: 01300017 - 007

Subject Item: **EU 003 Soil Vapor Extraction Area 2 (SVE II and II-E)**

Associated Items: CE 002 Thermal/Catalytic Oxidizer

SV 003 SVE Area 2 Controlled

SV 005 SVE Area 2 Uncontrolled

What to do	Why to do it
LIMITS	hdr
Volatile Organic Compounds: less than or equal to 16.0 tons/year using 12-month Rolling Sum for the total EU 003 VOC emitted from operations under Operating Scenario I and Operating Scenario II.	Title I Condition: to avoid major source status under 40 CFR Section 52.21; Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 to avoid major source status under Part 70
OPERATING SCENARIO I	hdr
Operating Scenario I: The Permittee may vent uncontrolled EU 003 emissions through SV 005 providing 12-month rolling sum EU 003 VOC emissions do not exceed 14.4 tons.	Title I Condition: to avoid major source status under 40 CFR Section 52.21; Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 to avoid major source status under Part 70
When operating under Scenario I, the Permittee is not subject to the requirements listed under subject item CE 002.	Minn. R. 7007.0800, subp. 2
OPERATING SCENARIO II	hdr
Operating Scenario II: When EU 003 12-month rolling sum VOC emissions equal or exceed 14.4 tons, the Permittee shall vent EU 003 emissions through CE 002/SV 003. The Permittee shall continue to vent EU 003 emissions through CE 002/SV 003 until the 12-month rolling EU 003 VOC emissions are less than 14.4 tons.	Title I Condition: to avoid major source status under 40 CFR Section 52.21; Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 to avoid major source status under Part 70
When operating under Scenario II, the Permittee shall follow all requirements listed under subject item CE 002.	Minn. R. 7007.0800, subp. 2
MONITORING AND RECORDKEEPING	hdr
Recordkeeping - Operating Scenario: Upon issuance of this permit, the Permittee shall record the current EU 003 operating scenario. Thereafter, the Permittee shall keep a record of each operating scenario change. The record shall be updated no later than the day following each change in operating scenario and shall specify the time and date of each scenario change, identify the scenario utilized upon each the change, and be signed by the person making the record.	Minn. R. 7007.0800, subp. 4 and 5
Monthly VOC Monitoring - Operating Scenario I (EU 003 Uncontrolled): At least once per calendar month the Permittee shall sample and analyze EU 003 vapor effluent when vapors are vented uncontrolled through SV 005. The Permittee shall obtain the results of each sample analysis no later than 30 days after obtaining the sample.	Minn. R. 7007.0800, subps. 4, 5, and 14
Monthly VOC Monitoring - Operating Scenario II (EU 003 Controlled by CE 002): Refer to CE 002 for monthly sampling requirements when EU 003 emissions are controlled by CE 002.	Minn. R. 7007.0800, subps. 4, 5, and 14
Monitoring and Recordkeeping: By the last day of each month the Permittee shall monitor and record the following data for each EU 003 operating scenario utilized during the previous month: 1. average flow rate in standard cubic feet per minute (scfm) for the previous month; 2. EU 003 operating days during the previous month; 3. VOC (total hydrocarbon) concentration during the previous month in EU 003 (uncontrolled) exhaust when operating under Operating Scenario I, and in CE 002 (controlled) exhaust when operating under Operating Scenario II of this permit. VOC concentration is determined through effluent sampling required under Subject Items EU 003 and CE 002 in Table A of this permit.	Title I Condition: to avoid major source status under 40 CFR Section 52.21; Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 to avoid major source status under Part 70

VOC Emissions Calculations: by the last day of each month, the Permittee shall calculate and record EU 003 VOC emissions for the previous month, and the previous 12-month period. Monthly EU 003 VOC emissions shall be calculated using the following equation: VOC = FR * C * T * 4.495E-08 where: VOC = tons of VOC emitted during the previous month FR = average flow rate determined by in-line flow meter (scfm) for the previous month C = EU 003 VOC emission concentration (ug/liter) for the previous month as determined under Subject Items EU 003 or CE 002 in Table A of this permit, as applicable for Operating Scenario I or II T = operating time during the previous month (days) 4.495E-08 = conversion factor (scf-ug-day-ton/min-liter-lb) (continued)	Title I Condition: to avoid major source status under 40 CFR Section 52.21; Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 to avoid major source status under Part 70
VOC Emissions Calculations: (continued from above) For any month where EU 003 is operated in both operating scenarios (I and II), the Permittee shall calculate VOC emissions for each operating scenario and sum the emissions for both scenarios, to determine the EU 003 total monthly VOC emissions. 12-month rolling sum emissions shall be calculated by summing monthly emissions from the previous 12 months. During the initial 11 months following permit issuance, the Permittee shall use historical monthly EU 003 VOC emission records as needed to calculate the 12-month rolling sum.	Title I Condition: to avoid major source status under 40 CFR Section 52.21; Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 to avoid major source status under Part 70

Facility Name: Magellan Pipeline Co LP - Mankato

Permit Number: 01300017 - 007

Subject Item: **CE 001 Vapor Combustion Unit**

Associated Items: EU 001 Truck Loading Rack

GP 002 Sources subject to Part 63, Subpart BBBBBB

What to do	Why to do it
The vapor combustion unit shall be operated at all times when emissions are vented to it.	Title I Condition: Operating requirement to avoid classification as major source under 40 CFR Section 52.21 and 40 CFR part 63; Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 to avoid major source classification under 40 CFR Section 70.2
The vapor combustion unit shall be operated with a pilot flame present at all times. The presence of a pilot flame shall be monitored using an ultraviolet sensor or any other equivalent device to detect the presence of a flame.	Title I Condition: Operating requirement to avoid classification as major source under 40 CFR Section 52.21 and 40 CFR part 63; Minn. R. 7007.3000 Minn. R. 7007.0800, subp. 2 to avoid major source classification under 40 CFR Section 70.2
(b)(5) The Permittee has chosen to comply with the performance testing alternative provided under Section 63.11092(a)(3) in lieu of the performance test required under Section 63.11092(a)(1). Therefore, the monitored operating parameter value may be determined according to the provisions of Section 63.11092(b)(5)(i). (i) Monitor presence of a pilot flame as specified in this operating permit. At the time that another performance test is required, the Permittee must determine the monitored operating parameter value according to the requirements specified Section 63.11092(b).	40 CFR Section 63.11092(b)

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Permit Number: 01300017 - 007

Subject Item: **CE 002 Thermal/Catalytic Oxidizer**

Associated Items: EU 003 Soil Vapor Extraction Area 2 (SVE II and II-E)

What to do	Why to do it
OPERATING REQUIREMENTS	hdr
CE 002 Operating Modes: CE 002 can operate in thermal or catalytic mode. The terms and conditions for each mode are listed below.	Minn. R. 7007.0800, subps. 5 and 11
The Permittee shall operate and maintain CE 002 at all times that EU 003 is venting to CE 002.	Minn. R. 7007.0800, subp. 2
Operation and Maintenance of Oxidizer: The Permittee shall operate and maintain the oxidizer in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by employees and MPCA staff.	Minn. R. 7007.0800, subp. 2
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Volatile Organic Compounds: greater than or equal to 85 percent control efficiency.	Title I Condition: to avoid major source status under 40 CFR Section 52.21; Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 to avoid major source status under Part 70
Thermal Oxidizer Temperature: Greater than or equal to 1350 degrees F (absolute minimum) at the Combustion Chamber unless a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the average temperature recorded during the most recent MPCA approved performance test where compliance for VOC emissions was demonstrated. If the temperature drops below the minimum temperature limit or if the temperature recorder malfunctions and does not generate valid temperature data, VOC emissions during these times shall be considered uncontrolled until the minimum temperature limit is once again achieved and/or the recorder is operating. This shall be reported as a deviation.	Title I Condition: to avoid major source status under 40 CFR Section 52.21; Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 to avoid major source status under Part 70
Catalytic Oxidizer Temperature: Greater than or equal to 630 degrees F (absolute minimum) at the inlet unless a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the average temperature recorded during the most recent MPCA approved performance test where compliance for VOC emissions was demonstrated. If the temperature drops below the minimum temperature limit or if the temperature recorder malfunctions and does not generate valid temperature data, VOC emissions during these times shall be considered uncontrolled until the minimum temperature limit is once again achieved and/or the recorder is operating. This shall be reported as a deviation.	Title I Condition: to avoid major source status under 40 CFR Section 52.21; Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 to avoid major source status under Part 70
MONITORING AND RECORDKEEPING	hdr
Monthly Recordkeeping Log: The Permittee shall record in a log the monthly operating hours for each of the two oxidizer operating modes (thermal and catalytic modes). The log must provide a unique system for identifying each mode of operation.	Minn. R. 7007.0800, subps. 5 and 11
Monitoring Equipment: The Permittee shall install and maintain thermocouples for measuring and recording the oxidizer temperature as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the oxidizer is operated. For catalytic mode, the Permittee shall maintain and operate a thermocouple monitoring device that continuously indicates and records both the inlet and outlet temperatures of the oxidizer, at least, once every 15 minutes. For thermal mode, the Permittee shall maintain and operate a thermocouple monitoring device that continuously indicates and records the outlet temperature of the oxidizer, at least, once every 15 minutes. The monitoring device shall have a margin of error less than the greater of +/- 0.75 percent of the temperature being measured or +/- 2.5 degrees Celsius.	Minn. R. 7007.0800, subps. 4 and 5
The Permittee shall maintain either a hard copy readout or computer disk file of the inlet and outlet temperature readings. Temperature readings will be recorded at least once every 15 minutes during operation.	Title I Condition: to avoid major source status under 40 CFR Section 52.21; Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 to avoid major source status under Part 70

Weekly Monitoring: The Permittee shall check the temperature recording device at least once per week to verify the device is working and recording properly. The Permittee may check the device either visually or electronically using telemetry. CE 002 has an automatic feature that will shut down EU 003 when the temperature drops below the values specified in this permit and EU 003 is operating under Operating Scenario II as defined under subject item EU 003 (EU 003 emissions are vented to CE 002). This ensures that EU 003 will not operate or emit pollutants under Operating Scenario II except when the CE 002 combustion temperature is above the required minimum temperature.	Minn. R. 7007.0800, subps. 4 and 5
Monthly VOC Monitoring: At least once per calendar month the Permittee shall sample and analyze CE 002 vapor effluent when EU 003 emissions are controlled by CE 002. The Permittee shall obtain the results of each sample analysis no later than 30 days after obtaining the sample.	Minn. R. 7007.0800, subps. 4, 5, and 14
Monthly Monitoring: At least once each month when EU 003 is controlled by CE 002 operating in catalytic mode, the Permittee shall record the temperature rise across the catalyst (outlet temp. - inlet temp.) while the process is running. If it is determined that the catalyst reactivity has been impaired (by comparison of the observed temperature rise to the past temperature rise records), the Permittee shall follow the corrective actions in the Operation and Maintenance Plan. The Permittee shall maintain written records of the monitoring and any corrective actions taken.	Minn. R. 7007.0800, subps. 4, 5, and 14
Quarterly Inspections: At least once per calendar quarter, the Permittee shall inspect the control equipment internal and external system components, including but not limited to the refractory, heat exchanger, and electrical systems. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.	Minn. R. 7007.0800, subps. 4, 5, and 14
Annual Calibration: The Permittee shall calibrate the temperature monitor at least annually and shall maintain a written record of the calibration and any action resulting from the calibration.	Minn. R. 7007.0800, subps. 4, 5, and 14
Corrective Actions (When EU 003 Is Controlled By CE 002): If the temperature is below the minimum specified by this permit or if the oxidizer or any of its components are found during the inspections to need repair, the Permittee shall take corrective action as soon as possible. Corrective actions shall return the temperature to at least the permitted minimum and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the catalytic oxidizer. The Permittee shall keep a record of the type and date of any corrective action taken.	Minn. R. 7007.0800, subps. 4, 5, and 14
Catalyst Reactivity: The Permittee shall verify the catalyst reactivity per the manufacturer's specifications and shall maintain a record of the results.	Title I Condition: to avoid major source status under 40 CFR Section 52.21; Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 to avoid major source status under Part 70

TABLE B: SUBMITTALS

Facility Name: Magellan Pipeline Co LP - Mankato

Permit Number: 01300017 - 007

Also, where required by an applicable rule or permit condition, send to the Permit Technical Advisor notices of:
- accumulated insignificant activities,
- installation of control equipment,
- replacement of an emissions unit, and
- changes that contravene a permit term.

Send submittals that are required to be submitted to the U.S. EPA regional office to:

Mr. George Czerniak
Air and Radiation Branch
EPA Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Each submittal must be postmarked or received by the date specified in the applicable Table. Those submittals required by parts 7007.0100 to 7007.1850 must be certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Other submittals shall be certified as appropriate if certification is required by an applicable rule or permit condition.

Send any application for a permit or permit amendment to:

AQ Permit Technical Advisor
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Table B lists most of the submittals required by this permit. Please note that some submittal requirements may appear in Table A or, if applicable, within a compliance schedule located in Table C. Table B is divided into two sections in order to separately list one-time only and recurrent submittal requirements.

Send submittals that are required by the Acid Rain Program to:

U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue NW (6204N)
Washington, D.C. 20460

Unless another person is identified in the applicable Table, send all other submittals to:

AQ Compliance Tracking Coordinator
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

Facility Name: Magellan Pipeline Co LP - Mankato

Permit Number: 01300017 - 007

What to send	When to send	Portion of Facility Affected
Notification of compliance status	due before 01/10/2011. The Notification of Compliance Status must specify which of the compliance options included in Table 1 to part 63, subpart BBBBBB is used to comply with subpart BBBBBB.	GP002
Testing Frequency Plan	due 60 days after Performance Test for SV 001 total organic compound emissions. The plan shall specify a testing frequency based on the test results and MPCA test frequency guidance. Future performance tests at 12-month, 36-month, or 60-month intervals, or as applicable, shall be required upon written approval of the test frequency plan by the MPCA.	EU001

TABLE B: RECURRENT SUBMITTALS

Facility Name: Magellan Pipeline Co LP - Mankato

Permit Number: 01300017 - 007

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year starting 05/06/1997 semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31.	Total Facility
Compliance Certification	due 30 days after end of each calendar year starting 05/06/1997 (for the previous calendar year). Submit the certification on a form approved by the Commissioner. The certification covers all deviations experienced during the calendar year.	Total Facility

APPENDIX
Facility Name: Magellan Pipeline Company LP - Mankato
Permit Number: 01300017-006

APPENIDX A. INSIGNIFICANT ACTIVITIES

Minn. R. 7007.1300	Description	Applicable Rule
Subpart 3(G)	Laboratory for QC of liquid petroleum products and ethanol	Minn. R. 7011.0710/0715
Subpart 3(H)(7)	Parts washing machine for small parts and tools	Minn. R. 7011.0710/0715
Subpart 3(I)	Thirteen (13) fixed roof product storage tanks (Tank Nos. 183, 184, 582, 583, 584, 586, 1323, 1382, 6008, 6009, 6010, 6011, and 6012) Thirteen (13) fixed roof additive storage tanks (Tank Nos. 10, 20, 21, 40, 80, 110, 120, 130, 132, 133, 160, 161, and 170) Two (2) fixed roof water storage tanks (Tank Nos. 340 and 341)	None
Subpart 3(J)	Fugitive emissions from unpaved roads and parking lots	Minn. R. 7011.0150
Subpart 3(K)	Infrequent use of spray equipment for routine housekeeping or plant upkeep	Minn. R. 7011.0710/0715

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 01300017-007

This technical support document (TSD) is intended for all parties interested in the permit and to meet the requirements that have been set forth by the federal and state regulations (40 CFR § 70.7(a)(5) and Minn. R. 7007.0850, subp. 1). The purpose of this document is to provide the legal and factual justification for each applicable requirement or policy decision considered in the determination to issue the permit.

1. General Information

1.1. Permittee and Stationary Source Location:

Table 1. Permittee and Stationary Source Information

Applicant/Address	Stationary Source/Address (SIC Code: 4613)
Magellan Pipeline Company, L.P. One Williams Center, MD 27-3 PO Box 22186 Tulsa OK 74121-2186	Magellan Pipeline Co. LP - Mankato 55199 State Highway 68 Mankato, Blue Earth County, MN 56001
Contact: Mr. Ryan Bowers Phone: 918-574-7471 ryan.bowers@magellanlp.com	

1.2. Facility Description

Magellan Pipeline Company, LLC (Permittee) owns and operates a bulk fuels storage and truck loading terminal (facility) in Mankato, Minnesota. The facility is fed by a pipeline and consists of a truck loading rack (EU 001) controlled by a vapor combustion unit (CE 001), petroleum product storage tanks, and soil vapor extraction units. Maximum loading rack throughput capacity is 604,800 gallons (14,400 barrels) per day. Facility total storage tank capacity is approximately 420,310 barrels. The Permittee transports the product via the pipeline and then through the terminal to trucks, but does not own the product.

There are two soil vapor extraction systems at the facility (EU 003 and EU 004). One of the systems (EU 004) is uncontrolled, and the other is controlled by an oxidizer that can operate in either catalytic or thermal mode. A third soil vapor extraction system (EU 002) was previously shutdown in September 2005.

This facility meets the definition of *bulk gasoline terminal* as defined at 40 CFR § 63.11100, and includes a gasoline loading rack with a daily throughput capacity in excess of 250,000 gallons.

The Permittee operates the facility under a non-expiring federally enforceable state operating permit. This permit action is a major amendment to the non-expiring state permit.

1.3 Description of the Activities Allowed by this Permit Action

The current permit No. 01300017-006 requires the Permittee to operate the oxidizer (CE 002) for Soil Vapor Extraction II and II-E (EU 003). This permit amendment revises this requirement by placing a 16.0 tons per year (tpy) VOC limit (12-month rolling sum basis) on EU 003 and allowing the Permittee to not operate CE 002 until EU 003 uncontrolled VOC emissions are 14.4 tpy. Once the actual 12-month rolling sum VOC emissions reach 14.4 tpy, the Permittee is required to operate CE 002 until the actual 12-month rolling sum EU 003 VOC emissions are reduced below 14.4 tpy.

This permit revises and adds new Title I requirements. Revising and adding Title I requirements triggers public noticing requirements described at Minn. R. 7007.0850, subp. 1(B), because the amendment allows a change described at Minn. R. 7007.1500, subp. 1(C).

Also, the following updates were made to the permit:

- Table A EU 001 - Minn. Rules performance testing-related requirements were moved to the Total Facility section of Table A;
- Table A EU 001 - The deadline for the next performance test was revised to October 2, 2010, based on October 2, 2007, performance testing results (measured emissions of 27.71 mg/liter compared to limit of 35 mg/liter);
- Table A EU 001 - Added a requirement to submit a test frequency plan 60 days after the next required test;
- Table A EU 001 – Revised two two-year recordkeeping requirements and one three-year recordkeeping requirement from part 60 subpart XX to reflect the fact that Minn. Rules require records retention for five years.
- Table A SV 001 – Moved the requirement to conduct a vapor collection system leak check using Method 21 and repair leaks greater than 10,000 ppm based on 40 CFR § 60.503(b) prior to performance testing to EU 001, and revised the citation to Minn. R. 7017.2020, subp. 1 because Section 60.503(b) only applies to the initial performance test;
- Table A SV 001 - Performance testing required by part 60 subpart XX was removed because subpart XX only requires an initial performance test (completed in 1998), and this testing requirement was redundant with testing required under EU 001;
- Table A SV 001 - Five Minn. Rules performance testing requirements were deleted due to redundancy with requirements in the Total Facility section of Table A;
- Table B - Four out-dated total facility notification requirements pertaining to the installation of EU 001 in 1998 were removed.
- CE 001 was previously described as an open-flame flare, but actually is an enclosed vapor combustion unit (similar to an oxidizer) with a pilot flame.

- EU 002 status was revised from active to retired in the Delta permit database facility description. This change was based on a September 2005 letter from the Permittee indicating that most of the SVE I (EU 002) extraction points would be closed, and that the few remaining extraction points would be routed to EU 004. The remaining extraction areas, EU 003 and EU 004, are now referred to as 'Area 1' and 'Area 2'. Area 1 is EU 004 comprised of SVE III and the few remaining points from SVE I. Area 2 is EU 003 comprised of SV II & II-E.

1.4. Facility Emissions:

Table 2. Total Facility Potential to Emit Summary

	PM tpy	PM_{10} tpy	$PM_{2.5}$ tpy	SO_2 tpy	NO_X tpy	CO tpy	VOC tpy	Single HAP tpy	All HAPs tpy
Total Facility Limited Potential Emissions	0	0	0	0	3.69	9.22	95.9	1.19	5.4
Total Facility Actual Emissions (2007)	0	0	0	0	1.52	3.80	29.49	HAPs not reported in emission inventory	

Table 3. Facility Classification

Classification	Major/Affected Source	Synthetic Minor	Minor
PSD		VOC	PM, PM_{10}, $PM_{2.5}$, SO_2, NOx, CO
Part 70 Permit Program		VOC, HAPs	PM_{10}, $PM_{2.5}$, SO_2, NOx, CO
Part 63 NESHAP		HAPs	

2. Regulatory and/or Statutory Basis

New Source Review

The facility is an existing non-major source under New Source Review regulations. VOC emissions are limited by the required use of a vapor combustion unit on the loading rack, and a 12-month rolling sum VOC limit on one of the soil vapor extraction units.

The changes are authorized by this permit will not change this non-major status. The facility is in the NSR listed source category of 'petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels'. A November 6, 2003, letter from EPA region 5 to Don Smith of the MPCA supports the determination that the facility is a 'petroleum storage and transfer unit with a total storage capacity exceeding 300,000 barrels' in the scope of 40 CFR § 52.21(b)(1)(i)(a).

Part 70 Permit Program

The facility is a non-major source under the Part 70 permit program for the same reasons listed above under the NSR permitting program.

New Source Performance Standards (NSPS)

The facility is subject to 40 CFR Part 60 subp. XX, Standards of Performance for Bulk Gasoline Terminals. The tanks at the facility are not subject to any NSPS because all tanks were installed between 1947 and 1954.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

The facility is a minor (area) source of HAPs.

As of January 10, 2008, subpart BBBBBB applies to this source because it is a *Bulk gasoline terminal* as defined at §63.11100. The facility is an existing source with a compliance date of January 10, 2011. The MPCA has chosen to not receive delegation from EPA for implementation of this NESHAP.

Minnesota State Rules

The facility is not subject to any Minnesota standards of performance. All tanks were installed between 1947 and 1954 which is before the July 7, 1969 effective date of Minn. R. 7011.1505 Standards of Performance for Storage Vessels.

Table 4. Regulatory Overview of Units Affected by the Modification/Permit Amendment

EU	Applicable Regulations	Comments:
EU 003	Title I Condition: VOC ≤16.0 tpy on a 12-month rolling sum	Title I limit to restrict total facility VOC emissions to less than the PSD and part 70 major source threshold of 100 tpy
GP 002	Part 63, subp. BBBBBB	Area Source NESHAP for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. This facility is a Bulk Gasoline Terminal

3. Technical Information

3.1 Emission Calculations

The Permittee submitted emission calculations for all sources at the facility. Refer to Table 5 for a limited controlled emission for product storage tanks, VOC fugitive leaks from seals, valves, and flanges, a loading rack, and two soil vapor extraction systems (SVE).

Table 5. Limited Controlled PTE (tons per year)

	VOC	Particulates	SO_2	NO_X	CO
Tanks GP 001	36.46	0	0	0	0
Loading Rack EU 001	32.24	0	0	3.69	9.22
Fugitives FS 001	0.30	0	0	0	0
Area 2 EU 003	16.0	0	0	0	0
Area 1 EU 004	10.88	0	0	0	0
Total	95.88	0	0	3.69	9.22

Permit No. 01300017-003 authorized the installation of EU 003 and required all EU 003 VOC emissions be vented to and controlled by an oxidizer (CE 002). Emission calculations for that permit assumed a 95 percent oxidizer control efficiency to restrict the additional EU 003 VOC and maintain the total facility VOC emissions below the 100 tpy PSD and part 70 major source threshold. That permit imposed a 95 percent control efficiency for the oxidizer, along with oxidizer inlet and outlet sampling to verify control efficiency and minimum temperature requirements for periodic monitoring.

Permit No. 01300017-007 revises the control equipment requirements for EU 003 by allowing two EU 003 operating scenarios, Scenario I and Scenario II. Scenario I is the uncontrolled venting of EU 003 emissions through SV 005 providing the 12-month rolling sum EU 003 VOC emissions are less than 14.4 tons. Scenario II requires the Permittee to vent EU 003 VOC emissions through the oxidizer (CE 002) if 12-month VOC emissions equal or exceed 14.4 tons. Permit No. 01300017-007 requires EU 003 VOC emissions to be determined by monthly sampling of uncontrolled and controlled EU 003 emissions. As a result it is no longer justified for the permit to require verification of CE 002 control efficiency. In addition the CE 002 required minimum control efficiency was reduced from 95 percent to 85 percent as requested by the Permittee because as the concentration of TPH decreases, CE 002 efficiency decreases.

For additional information please refer to the attached spreadsheet.

3.2 Periodic Monitoring

In accordance with the Clean Air Act, it is the responsibility of the owner or operator of a facility to have sufficient knowledge of the facility to certify that the facility is in compliance with all applicable requirements.

In evaluating the monitoring included in the permit, the MPCA considers the following:

- The likelihood of violating the applicable requirements;
- Whether add-on controls are necessary to meet the emission limits;
- The variability of emissions over time;
- The type of monitoring, process, maintenance, or control equipment data already available for the emission unit;
- The technical and economic feasibility of possible periodic monitoring methods; and

- The kind of monitoring found on similar units elsewhere.

Table 6 summarizes the periodic monitoring requirements for those emission units for which the monitoring required by the applicable requirement is nonexistent or inadequate.

Table 6. Periodic Monitoring

Subject Item	Requirement (basis)	Additional Monitoring	Discussion
CE 002 (EU 003; SV 003)	Title I Condition: Oxidizer control efficiency > 85% for VOC to avoid NSR	Recordkeeping: Temperature records, weekly check of temperature monitor, and periodic preventative maintenance of oxidizer.	Automatic recording of oxidizer temperature and weekly check of temperature monitor is reasonable because the soil vapor extraction system will automatically shutdown if the oxidizer temperature falls below the permit required minimum temperatures (Note there are two required minimum temperatures; one for thermal operating mode, and another for catalytic operating mode). Removed existing requirement for quarterly inlet testing of oxidizer because compliance is determined by monthly calculation of actual VOC instead of demonstration of 95% control efficiency. Control requirement changed from 95% to 85% due to addition of title I 12-month rolling sum VOC limit for EU 003 to reflect reduced control efficiency as EU 003 VOC concentration declines. Monthly CE 002/SV 003 VOC sampling and analysis is required to determine VOC emission concentration for calculating controlled EU 003 VOC emissions.
EU 003 (SV 003 & SV 005)	Title I Condition: VOC limited to 16.0 tons per year on a 12-month rolling sum basis to avoid NSR	Monthly calculation of total EU 003 VOC emissions from SV 003 and SV 005	Permittee requested authorization to not vent EU 003 emissions through CE 002 unless actual 12-month emissions attain 90% of the 16.0 tpy limit. This is acceptable because restriction of EU 003 VOC emissions to less than or equal to 16.0 tons per year will ensure the total facility VOC emissions will not exceed the NSR and part 70 100 tpy major source threshold. During the initial 11 months after permit issuance, the Permittee will use existing historical monthly VOC records to calculate the 12-month rolling sum. Monthly sampling and analysis of uncontrolled VOC emissions vented through SV 005 (and CE

			002-controlled VOC emissions vented through SV 003 as noted above) is required for calculating 12-month rolling sum total EU 003 VOC emissions. Maintain a log of the time and date of each change of operating scenario.

3.3 Insignificant Activities

The facility contains some operations which are classified as insignificant activities. These are listed in Appendix A to the permit. Table 6 describes the activities.

Table 6. Insignificant Activities

Insignificant Activity	General Applicable Emission limit	Discussion
Emissions from a laboratory, as defined in Minn. R. 7007.1300, subp. 3(G)	PM, variable depending on airflow Opacity ≤ 20% (Minn. R. 7011.0710/715)	These are very small, intermittent, bench-top operations that typically do not even have any emissions. It is highly unlikely that they could violate the applicable requirement.
Individual units with actual emissions less than 2000 lb/year of certain pollutants - Fixed roof storage tanks	None – tanks pre-date effective date of all state and federal regulations	These tanks store very low vapor pressure products such as distillate fuel oil. Potential VOC emissions are very low and no monitoring is warranted.
Cleaning operations: alkaline/phosphate cleaners and associated cleaners and associated burners	PM, variable depending on airflow Opacity ≤ 20% (Minn. R. 7011.0610 & Minn. R. 7011.0710 and/or 7011.0715)	For these units, there are some factors available for the burners, but very little information regarding the cleaning operation itself. However, based on general knowledge of how they operate, it is highly unlikely that they could violate the applicable requirement or that testing would be feasible.

Fugitive Emissions from unpaved roads and parking lots	Requirement to take reasonable measures to prevent PM from becoming airborne (Minn. R. 7011.0150)	The permit contains the general requirement that this standard must be met.
Infrequent use of spray paint equipment for routine housekeeping or plant upkeep activities not associated with primary production processes at the stationary source	PM, variable depending on airflow or process weight rate Opacity $\leq$ 20% (Minn. R. 7011.0715)	While spray equipment will have the potential to emit particulate matter, these particular activities are used infrequently.

3.4 Comments Received

Public Notice Period: February 25 - March 27, 2009
EPA 45-day Review Period: February 25 - March 27, 2009

No comments were received during the public comment period.

4. Conclusion

Based on the information provided by Magellan Pipeline Company, L.P., the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 01300017-007, and this TSD, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team: Marshall Cole (permit writer/engineer)
Jennifer Lovett (enforcement)
Marc Severin (stack testing)
Bonnie Nelson (peer reviewer)

AQ File No. 1858C; DQ 2203

Attachments: 1. PTE Summary
2. Facility Description and CD-01 Forms