AIR EMISSION PERMIT NO. 01300017-004

IS ISSUED TO

Magellan Pipeline Company, LLC

Magellan Pipeline Company, LLC - Mankato Terminal
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 are described in the following permit application(s):

Permit Type	Application Date	Issue Date	Action Number
Total Facility Operating Permit	03/19/1996; updated 11/08/1996	05/06/1997	001
Administrative Amendment	Agency Initiated	04/16/1998	002
Major Amendment	12/28/2001	07/15/2003	003
Major Amendment	11/21/2003	see below	004

This permit 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 defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Permit Type: State; Limits to Avoid Part 70 and NSR
Issue Date: February 5, 2004
Expiration: Permit Does Not Expire
Title I Conditions do not expire.

Ann M. Foss
Major Facilities Section Manger
Majors And Remediation Division

for Sheryl A. Corrigan
Commissioner
Minnesota Pollution Control Agency

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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:

Magellan Pipe Line Company owns and operates a bulk fuels storage and truck loading terminal in Mankato, Minnesota. The facility consists of a truck loading rack (EU 001) controlled by a flare (CE 001), petroleum product storage tanks, and soil vapor extraction units. The facility is subject to permit conditions requiring use of the flare and an oxidizer (CE 002) for one of the extraction units, to avoid major source classification under all federal air permitting programs (40 CFR pt. 70, 40 CFR pt. 63, and 40 CFR § 52.21).

ACTION 002

PER 002 is an administrative amendment that added loading rack performance testing required by 40 CFR pt. 60, subp. XX.

ACTION 003

PER 003 is a major amendment authorizing 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.

ACTION 004

PER 004 is a major amendment authorizing a change in the monitoring requirements for CE 002. In addition, this permit action acknowledges 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.

TABLE A: LIMITS AND OTHER REQUIREMENTS

02/05/05

Facility Name: Williams Pipe Line Co - Mankato

Permit Number: 01300017 - 004

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
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)
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, B, and/or C.	Minn. R. ch. 7017
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)
Monitoring Equipment: Install or make needed repairs to monitoring equipment within 60 days of issuance of the permit if monitoring equipment is not installed and operational on the date the permit is issued.	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)
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)
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
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
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
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)
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
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
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)
Record keeping: 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)

TABLE A: LIMITS AND OTHER REQUIREMENTS

02/05/05

Facility Name: Williams Pipe Line Co - Mankato

Permit Number: 01300017 - 004

Record keeping: 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)
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)
Emission Inventory Report: due 91 days after end of each calendar year following permit issuance (April 1). To be submitted 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
The Permittee shall comply with the general conditions.	Minn. R. 7007.0800, subp. 16

TABLE A: LIMITS AND OTHER REQUIREMENTS

02/05/05

Facility Name: Williams Pipe Line Co - Mankato

Permit Number: 01300017 - 004

What to do	Why to do it
Immediately before the performance test required by 40 CFR Sections 60.503 and 60.8, 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.	40 CFR Section 60.503(b), Minn. R. 7011.1550
Performance Test: due 180 days after Initial Startup or within 60 days of reaching the maximum production rate at which the facility will be operated, whichever is sooner, to demonstrate compliance with the standards in 40 CFR section 60.502(b) and (h).	40 CFR Section 60.503 and 60.8, Minn. R. 7011.1550
Performance Test Pre-test Meeting: due 7 days before Performance Test for total organic compounds.	Minn. R. 7017.2030, subp. 4

TABLE A: LIMITS AND OTHER REQUIREMENTS

02/05/05

Facility Name: Williams Pipe Line Co - Mankato

Permit Number: 01300017 - 004

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 shall be kept on file at the terminal for at least 2 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 >15 days) 5. Inspector name and signature	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 2 years.	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 3 years.	40 CFR Section 60.505(f), Minn. R. 7011.1550
The existing loading rack will be shut down and its removal will start, when the new rack attains normal operation. Removal must be completed within six months of initial startup of the new rack.	Minn. R. 7007.0800, subp. 2
Performance Test: due before end of each calendar 60 months starting 04/16/1998 in accordance with 40 CFR 60.503.	Minn. R. 7017.2020, subp. 1
Performance Test Pre-test Meeting: due 7 days before Performance Test	Minn. R. 7017.2030, subp. 4

TABLE A: LIMITS AND OTHER REQUIREMENTS

02/05/05

Facility Name: Williams Pipe Line Co - Mankato

Permit Number: 01300017 - 004

What to do	Why to do it
Flares shall be operated at all times when emissions may be vented to them.	Title I Condition: Limit to avoid classification as major source under 40 CFR Section 52.21 and part 63; Minn. R. 7007.0800, subp. 2 to avoid major source classification under 40 CFR Section 70.2
Flares shall be operated with a flame present at all times. The presence of a flare pilot flame shall be monitored using an ultraviolet sensor or any other equivalent device to detect the presence of a flame.	Title I Condition: Limit to avoid classification as major source under 40 CFR Section 52.21 and part 63; Minn. R. 7007.0800, subp. 2 to avoid major source classification under 40 CFR Section 70.2

TABLE A: LIMITS AND OTHER REQUIREMENTS

02/05/05

Facility Name: Williams Pipe Line Co - Mankato

Permit Number: 01300017 - 004

What to do	Why to do it
The Permittee shall operate and maintain the oxidizer equipment any time the remediation equipment is in operation.	Minn. R. 7007.0800, subp. 2
Operation and Maintenance of Oxidizers: 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
Alternative Operating Scenarios: The air pollution control equipment used by the Permittee can operate in two different modes - either as a thermal oxidizer or as a catalytic oxidizer. The terms and conditions for each scenario are listed below and includes that the Permittee must record in a log a record of the scenario under which it is operating.	Minn. R. 7007.0800, subps. 5 and 11
Daily Recordkeeping Log: The Permittee must record daily, in a log, the hours of operation that the thermal oxidizer or catalytic oxidizer is in use. The log must provide a unique system for identifying each mode of operation (thermal or catalytic).	Minn. R. 7007.0800, subps. 5 and 11
THERMAL OXIDIZER REQUIREMENTS (Scenario 1)	hdr
The Permitttee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Volatile Organic Compounds greater than or equal to 95 percent control efficiency.	Title I Condition: Limit taken to avoid classification as a major source and modification under 40 CFR Section 52.21
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, the VOC used during that time shall be considered uncontrolled until the minimum temperature limit is once again achieved. This shall be reported as a deviation.	Title I Condition: Limit taken to avoid classification as a major source and modification under 40 CFR Section 52.21
The Permittee shall maintain a hard copy readout or computer disk file of the temperature readings for the combustion chamber. Temperature readings will be recorded at least once every 15 minutes during operation.	Title I Condition: Limit taken to avoid classification as a major source and modification under 40 CFR Section 52.21
Daily Monitoring: The Permittee shall check the temperature recording device at least once each operating weekday (Monday through Friday) to verify that it 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. This shut down will stop all emissions from EU 003. This feature ensures that EU 003 will not operate or emit pollutants except when the combustion temperature is above the required minimum temperature.	Minn. R. 7007.0800, subps. 4 and 5
Monitoring Equipment: The Permittee shall install and maintain thermocouples to conduct temperature monitoring required by this permit. The monitoring equipment must be installed, in use, and properly maintained whenever operation of the monitored control equipment is required.	Minn. R. 7007.0800, subp. 4
The Permittee shall maintain and operate a thermocouple monitoring device that continuously indicates and records the combustion chamber temperature of the thermal 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
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: If the temperature is below the minimum specified by this permit or if the thermal 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 thermal 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
CATALYTIC OXIDIZER REQUIREMENTS (Scenario 2)	hdr
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 95 percent control efficiency.	Title I Condition: Limit taken to avoid classification as a major source and modification under 40 CFR Section 52.21

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Williams Pipe Line Co - Mankato

Permit Number: 01300017 - 004

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, the VOC used during that time shall be considered uncontrolled until the minimum temperature limit is once again achieved. This shall be reported as a deviation.	Title I Condition: Limit taken to avoid classification as a major source and modification under 40 CFR Section 52.21
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: Limit taken to avoid classification as a major source and modification under 40 CFR Section 52.21
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: Limit taken to avoid classification as a major source and modification under 40 CFR Section 52.21
Daily Monitoring: The Permittee shall check the temperature recording device at least once each operating weekday (Monday through Friday) to verify that it 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. This shut down will stop all emissions from EU 003. This feature ensures that EU 003 will not operate or emit pollutants except when the combustion temperature is above the required minimum temperature.	Minn. R. 7007.0800, subps. 4 and 5
Monitoring Equipment: The Permittee shall install and maintain thermocouples for measuring and recording the temperature as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when operation of the monitored control equipment is required.	Minn. R. 7011.0075, subp. 3
The Permittee shall maintain and operate a thermocouple monitoring device that continuously indicates and records both the inlet and outlet temperatures of the catalytic 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
Monthly Monitoring: At least once each month during normal operation, 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 Monitoring: At least once per calendar quarter, the Permittee shall monitor the vapor influent and effluent. Additional vapor discharges will be collected after any modifications that affect the control device operations. Within 30 days of collecting any quarterly sample, the Permittee shall obtain results. A confirmation sample will be taken within 2 additional days, if the initial quarterly sample indicates that the system is not achieving at least 95% control efficiency. If the confirmation sample confirms that the system is not achieving a 95 % control efficiency, the Permittee shall shut down the system and take corrective actions as soon as possible.	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: If the temperature is below the minimum specified by this permit or if the catalytic 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

TABLE B: SUBMITTALS

02/05/05

Facility Name: Williams Pipe Line Co - Mankato

Permit Number: 01300017 - 004

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.

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:

Permit Technical Advisor
Permit Section
Air Quality Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

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.

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

Supervisor
Compliance Determination Unit
Air Quality Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

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

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

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

02/05/05

Facility Name: Williams Pipe Line Co - Mankato

Permit Number: 01300017 - 004

What to send	When to send	Portion of Facility Affected
Notification of the Actual Date of Initial Startup	due 15 days after Initial Startup . Submit the name and number of each unit and the actual date of initial startup each unit.	Total Facility
Notification of the Anticipated Date of Initial Startup	due 30 days before Anticipated Date of Initial Startup . Submit the name and number of each unit and the anticipated date of initial startup each unit.	Total Facility
Notification of the Date Construction Began	due 30 days after Start Of Construction . Submit the name and number of each unit and the date construction of each unit began.	Total Facility
Notification of the date of Equipment Removal/Dismantlement	due 15 days after Equipment Removal and/or Dismantlement . Submit the name and number of each unit and the date the unit was removed and/or dismantled.	Total Facility
Performance Test Notification (written)	due 30 days before Performance Test	EU001
Performance Test Notification (written)	due 30 days before Performance Test for total organic compounds.	SV001
Performance Test Plan	due 30 days before Performance Test	EU001
Performance Test Plan	due 30 days before Performance Test for total organic compounds.	SV001
Performance Test Report - Microfiche Copy	due 105 days after Performance Test	EU001
Performance Test Report - Microfiche Copy	due 105 days after Performance Test for total organic compounds.	SV001
Performance Test Report	due 45 days after Performance Test	EU001
Performance Test Report	due 45 days after Performance Test for total organic compounds.	SV001

TABLE B: RECURRENT SUBMITTALS

02/05/05

Facility Name: Williams Pipe Line Co - Mankato

Permit Number: 01300017 - 004

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). To be submitted on a form approved by the Commissioner. The report covers all deviations experienced during the calendar year.	Total Facility

TECHNICAL SUPPORT DOCUMENT
For
DRAFT AIR EMISSION PERMIT NO. 01300017-004

This technical support document is intended for all parties interested in the draft permit and to meet the requirements that have been set forth by the federal regulations and Minn. R. (40 CFR, Section 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 draft permit.

1. General Information

1.1. Applicant and Stationary Source Location:

Applicant/Address	Stationary Source/Address (SIC Code: 4613)
Magellan Pipeline Company, LLC One Williams Center P.O. Box 21899, MD 27-3 Tulsa, Oklahoma 74121 Contact: Terri Holloman (918) 573-1559	55199 State Highway 68 Mankato, MN 56001

1.2. Description of the Permit Action

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. The facility consists of a truck loading rack (EU 001) controlled by a flare (CE 001), petroleum product storage tanks, and soil vapor extraction units. The Permittee does not own the product; they provide transportation of the product via the pipeline and then through the terminal to trucks. This permit action is a major amendment to a non-expiring state permit.

1.3 Description of the Activities Allowed by this Permit Action

This major amendment revises the requirements for daily checking of the CE 002 (oxidizer) temperature monitor for soil vapor extraction system II known as 'SVE II & II-E' (EU 003). CE 002 is an oxidizer that is permitted to operate in either thermal or catalytic mode.

In addition, this permit action acknowledges the recent installation of a third soil vapor extraction system known as 'SVE III'(EU 004) and incorporates emissions from EU 004 into the MPCA air permitting database. The Permittee submitted a minor amendment application on September 3, 2003, for this installation. However, after MPCA review of the application, it was determined that no permit amendment would be issued at that time. This determination was based on the fact that the installation could be made and operated according to the minor permit amendment provisions in Minn. R. 7007.1450, SVE III was not subject to any applicable

requirements, and the additional emissions from SVE III did not create the need for source-specific emission limits or other requirements for the facility to maintain non-major source status under part 70, part 63, and § 52.21.

1.4. Facility Emissions:

Table 1. Emissions Associated With the Modification

pollutant	VOC	2,2,4-trimethylpentane	benzene	ethylbenzene	hexane	toluene	xylene
tons per year	10.0	0.08	0.09	0.01	0.16	0.13	0.05

The emissions associated with this permit action are from SVE III. Although no applicable requirements apply, the emissions data for the facility is updated by this permitting action through the addition of SVE III emissions. The SVE III emissions data is the Permittee's estimate of maximum potential emissions. Emission rates will decline over time as the volatile compounds in groundwater and the soil vapor space are removed by SVE III. The emissions are from a single well and are uncontrolled. Even with the additional uncontrolled SVE III emissions, the facility will retain non-major status for Parts 70 and 63, and for 40 CFR § 52.21 because of existing title I requirements for flare and oxidizer operation on the loading rack and SVE III, respectively.

Installation of SVE III was done in response to the MPCA Majors and Remediation Division requirement to continue remediation of groundwater contamination at the facility. The Permittee conducts sampling to verify the estimated emission rates and to evaluate remediation progress.

Table 2. Total Facility Potential to Emit Summary:

	PM tpy	PM_{10} tpy	SO_2 tpy	NOx tpy	CO tpy	VOC tpy	Single HAP tpy	All HAPs tpy
Total Facility Limited Potential Emissions	0	0	0	5.21	13.0	94.6	1.51	4.44
Total Facility Actual Emissions (2003)	0	0	0	2.06	5.15	23.29	HAPs not reported in emission inventory	

Table 3. Total Facility Classification

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

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 flare on the loading rack, and an oxidizer on one of the soil vapor extraction units.

No changes are authorized by this permit. The MPCA contends (and the Permittee disagrees) that 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). See attached letter.

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 has control equipment operating requirements to reduce HAP emissions and remain a non-major source under 40 CFR part 63. Therefore, no NESHAPS apply.

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

EU, GP, or SV	Applicable Regulations	Comments:
CE 002 (EU 003)	Minn. R. 7007.0800, subps. 4 and 5	Revision to CE 002 Oxidizer Temperature Monitor Check Requirement

3. Technical Information

Revision to CE 002 Oxidizer Temperature Monitor Check Requirement: The Permittee requests revision of the requirement for the daily check of the CE 002 oxidizer temperature monitor. Currently, PER 003 requires a daily check of the monitor to ensure that it is working.

However, the facility is only staffed Monday through Friday, has very limited staffing on Saturday, and no staffing on Sunday. CE 002 has an automatic feature that will shut down SVE II & II-E/EU 003 when the temperature drops below the required temperature values specified in this permit. This shutdown will stop all emissions from EU 003. This feature ensures that EU 003 will not operate or emit pollutants except when the oxidizer combustion temperature is above the permit-required minimum temperature. This automatic shutdown feature allows revision of the monitor check requirement while still fulfilling periodic monitoring requirements.

3.1 Calculations of Potential to Emit

Emissions estimates were provided by the Permittee and are based on estimated product recovery and vapor extraction rates.

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 5 summarizes the periodic monitoring requirements for those emission units that are the subject of this permit action, and for which the monitoring required by the applicable requirement is nonexistent or inadequate.

Table 5. Periodic Monitoring

Emission Unit or Group	Requirement (basis)	Additional Monitoring	Discussion
CE 002 (EU 003)	Title I Condition: Oxidizer control efficiency ≥ 95% for VOC to avoid NSR	Recordkeeping: Temperature records, daily check of temperature monitor, and periodic preventative maintenance of oxidizer.	Change daily check of temperature monitor to weekdays only. This is permissible 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).

3.3 Community Involvement Process:

This permit action is a major amendment so it is subject to the CIP. The initial information gathering phase revealed that no complaints have been received by the MPCA. MPCA air enforcement staff provided feedback about construction and operation of SVE II & II-E without a permit, and a tardy notification for startup of CE 002 (catalytic/thermal oxidizer). However, these issues are not in the scope of this permitting action, nor will this permit action affect these enforcement issues. Therefore, this project warrants no further community involvement.

3.4 Public Notice - not required

As stated by Minn. R. 7007.1500, subp. 3.A., a public ntoice is not required for this major amendment because it is not an amendment that falls in the categories of Minn. R. 7007.1500, subp. items 1.C. or 1.D (this amendment is made according to Minn. R. 7007.1500, subp. 1.A.). Nor does the amendment involve issues that are likely to generate significant material adverse comment from the public, and therefore a public notice according to Minn. R. 7007.0850, subp. 2.C. is not warranted either.

4. Conclusion

Based on the information provided by Magellan Pipeline Company, LLC, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 01300017-004 and this technical support document, 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)
A-Jellil Abdella (enforcement)
Bruce Braaten (peer reviewer)

Attachment: November 6, 2003, letter from Pamela Blakley, EPA Region V Chicago, to Don Smith, MPCA