

**AIR EMISSION PERMIT NO. 12300070-003
(PART 70 REISSUANCE PERMIT)**

IS ISSUED TO

Magellan Pipeline Company, L.P.

MAGELLAN PIPELINE COMPANY, L.P. –ST. PAUL TERMINAL
2451 West County Road C
St. Paul, Ramsey County, MN 55113

The emission units, control equipment and emission stacks at the stationary source authorized in this permit are as described in the following permit application(s):

Permit Application Type	Action No.	Application Date (s)	Issuance Date (s)
Total Facility Operating Permit	001	June 15, 1996	January 12, 2003
Administrative Amendment	002	December 30, 2004	March 31, 2005
Total Facility Operating Permit - Reissuance	003	July 26, 2002	See Below

This permit supersedes Air Emission Permit No. 12300070-001 and 002 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.

Permit Type: Federal; Part 70 Reissuance/Major NSR

Issue Date: January 4, 2006

Expiration: January 4, 2011
All Title I Conditions do not expire.

Richard J. Sandberg, Manager
Air Quality Permits Section
Industrial 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 Pipeline Company, L.P. formally known as Williams Pipeline Company owns and operates a liquid petroleum bulk storage and terminal interstate pipeline in St. Paul, Minnesota. The facility consists of storage tanks, pump stations, tank truck loading racks with vapor controller and vapor processing systems, soil vapor extraction unit and insignificant emission units. The terminal receives and transports petroleum products to other terminals through an interstate pipeline distribution network.

The main sources of air emissions are volatile organic compounds (VOCs) from this facility. The facility is a major source under the federal operation permits program (40 CFR pt. 70) and major source under federal New Source Review (NSR). The permit limits hazardous air pollutants (HAPs) emissions such that the facility is an area source under the National Emissions Standards for Hazardous Air Pollutants (NESHAPs, 40 CFR pt. 63).

TABLE A: LIMITS AND OTHER REQUIREMENTS

01/04/06

Facility Name: Magellan Pipeline Co LP - St Paul

Permit Number: 12300070 - 003

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
A. OPERATIONAL REQUIREMENTS	hdr
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
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)
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment. At a minimum, the O & M plan shall identify all air pollution control equipment and control practices and shall include a preventative maintenance program for the equipment and practices, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment and practices to proper operation to meet applicable permit conditions, a description of the employee training program for proper operation and maintenance of the control equipment and practices, and the records kept to demonstrate plan implementation.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
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
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 enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7030.0010 - 7030.0080
Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).	Minn. R. 7007.0800, subp. 9(A)
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
Emergency Provisions: The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs and other relevant data in accordance with Minn. R. 7007.1850.	Minn. R. 7007.1850
B. MONITORING REQUIREMENTS	hdr
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, B, and/or C, 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)
C. RECORDKEEPING REQUIREMENTS	hdr
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 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 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

01/04/06

Facility Name: Magellan Pipeline Co LP - St Paul

Permit Number: 12300070 - 003

D. PERFORMANCE TESTING	hdr
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
Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as specified by Minn. R. 7017.2025 following formal review of a subsequent performance test on the same unit.	Minn. R. 7017.2025
E. REPORTING/SUBITTALS	hdr
Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3. At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.	Minn. R. 7019.1000, subp. 3
Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2. At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7019.1000, subp. 1
Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7019.1000, subp. 1
Application for Permit Amendment: If a permit amendment is needed, submit an 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)
Emission Inventory Report: due on or before April 1 of each calendar year following permit issuance. To be submitted on a form approved by the Commissioner.	Minn. R. 7019.3000 through Minn. R. 7019.3100
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095

TABLE A: LIMITS AND OTHER REQUIREMENTS

01/04/06

Facility Name: Magellan Pipeline Co LP - St Paul

Permit Number: 12300070 - 003

Subject Item: EU 001 Tank Truck Bottom Load - MPL w/Vapor Combustor Control**Associated Items:** CE 001 Flaring

SV 001

What to do	Why to do it
A. POLLUTANT LIMIT	hdr
Total Organic Compounds: less than or equal to 35 milligrams/liter of total organic compounds per liter of gasoline loaded.	40 CFR Section 60.502(b); Minn. R. 7011.1550
B. OPERATIONAL REQUIREMENTS	hdr
Design Requirement: 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 during the performance test when measured by the procedures specified in 40 CFR Section 60.503(d).	40 CFR Section 60.502(h); Minn. R. 7011.1550; Also meets CAM requirements under 40 CFR Section 64.3
Gauge Pressure Requirement: 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; Also meets CAM requirements under 40 CFR Section 64.3
Loadings: 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 40 CFR 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
Operation Requirement: 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
Operation Requirement: 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
Operation Requirement: At all times, including periods of startup, shutdown, and malfunction, owners and operators shall maintain and operate any affected facility including associated air pollution control equipment in a matter consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection.	40 CFR Section 60.11(d)
C. MONITORING AND RECORDKEEPING REQUIREMENTS	hr
Monthly Inspections: 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; Also meets CAM requirements under 40 CFR Section 64.7
Leak Repairs: Each detection of a leak shall be recorded and the source of the leak repaired within 15 days after each inspection.	40 CFR Section 60.502(j); Minn. R. 7011.1550; Also meets CAM requirements under 40 CFR Section 64.7

TABLE A: LIMITS AND OTHER REQUIREMENTS

01/04/06

Facility Name: Magellan Pipeline Co LP - St Paul

Permit Number: 12300070 - 003

Recordkeeping: 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 or equivalent method. Trucks tested in accordance with 40 CFR Section 63.425(a) are considered to meet this requirement. This documentation shall include, as a minimum, the following information: (1) Test title: Gasoline Delivery Tank Pressure Test -EPA Reference Method 27. (2) Tank owner and address. (3) Tank identification number. (4) Testing location. (5) Date of test. (6) Tester name and signature. (7) Witnessing inspector, if any: Name, signature, and affiliation. (8) Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs).	40 CFR Section 60.505(b); Minn. R. 7011.1550
Recordkeeping: 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
Leak Recordkeeping: A record of each monthly leak inspection shall be kept on file at the terminal for at least five (5) 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 the repair interval >15 days) 5. Inspector name and signature.	40 CFR Section 60.505(c); Minn. R. 7011.1550; Minn. R. 7007.0800, subp. 5
Recordkeeping of Notifications: The Permittee shall keep documentation of all notifications required under 40 CFR Section 60.502(e)(4) on file at the terminal for at least five (5) years.	40 CFR Section 60.505(d); Minn. R. 7011.1550
Component Recordkeeping: The Permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system on site for at least five (5) years.	40 CFR Section 60.505(f); Minn. R. 7011.1550
Correction Actions: If the gauge pressure in the delivery tank exceeds 4,500 pascals (450 mm of water) during product loading, the Permittee shall take corrective action as soon as possible according to the control equipment manufacturer's specifications and the facility operation and maintenance plan. The Permittee shall keep a log of all corrective actions taken with records entered upon completion of each corrective action. All situations warranting corrective actions are deviations, the Permittee shall report the deviations in the semiannual deviations report as required in the total facility section of this permit.	Minn. R. 7007.0800, subp. 2; Also meets CAM requirements under 40 CFR Section 64.7(d)
Semiannual Inspections: The Permittee shall inspect the vapor combustion unit (VCU) at least semiannual and shall maintain a written record of the inspection and any action resulting from the inspection.	Minn. R. 7007.0800, subps. 4, 5, and 14; Also meets CAM requirements under 40 CFR Section 64.3 (b)(4)
Operation and Maintenance (O & M) Plan: The Permittee shall operate and maintain the vapor combustion unit in accordance with the facility O & M Plan and the control equipment manufacturer's specifications. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	Minn. R. 7007.0800, subps 2 and 14; Also meets CAM requirements under 40 CFR Section 64.8
D. POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
The Permittee shall operate the enclosed flare (CE 001) during loading to control emissions from the Bottom Loading Rack (EU 001). The Permittee shall document periods of non-operation of the control equipment.	Minn. R. 7007.0800, subps. 2 and 14
Recordkeeping Requirement: The Permittee shall record each startup, shutdown, or malfunction of the vapor combustion unit.	40 CFR Section 60.7(b)
E. PERFORMANCE TESTING REQUIREMENTS	hdr
Performance Test: due before end of each 60 months starting 11/18/2002 for total organic compounds, and pressure according to 40 CFR Section 60.502(h). The first performance test required under this condition was completed on November 18, 2002.	40 CFR Section 60.502(h); Minn. R. 7017.2020, subp. 1; Also meets CAM requirements under 40 CFR Section 64.3(c)
Performance Test Notifications and Submittals; 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 day before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy or CD: due 105 day 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. 7017.2030, subp. 1-4; Minn. R. 7017.2018 and Minn. R. 7017.2035, subp. 1-2

TABLE A: LIMITS AND OTHER REQUIREMENTS

01/04/06

Facility Name: Magellan Pipeline Co LP - St Paul
Permit Number: 12300070 - 003

F. REPORTING REQUIREMENT	hdr
Corrective Actions Reporting: All situations warranting corrective actions are deviations, the Permittee shall report the deviations in the semiannual deviations report as required in the total facility section of this permit.	Minn. R. 7007.0800, subp. 2; Also meets CAM requirements under 40 CFR Section 96.9(c)

TABLE A: LIMITS AND OTHER REQUIREMENTS

01/04/06

Facility Name: Magellan Pipeline Co LP - St Paul

Permit Number: 12300070 - 003

Subject Item: EU 002 Tank Truck Bottom Load - Flint Hills Resources (FHR) w/Vapor Combustor Control**Associated Items:** CE 002 Flaring

SV 002

What to do	Why to do it
A. POLLUTANT LIMIT	hdr
Total Organic Compounds: less than or equal to 35 milligrams/liter of total organic compounds per liter of gasoline loaded.	40 CFR Section 60.502(b); Minn. R. 7011.1550
B. OPERATIONAL REQUIREMENTS	hdr
Design Requirement: 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 during the performance test when measured by the procedures specified in 40 CFR Section 60.503(d).	40 CFR Section 60.502(h); Minn. R. 7011.1550; Also meets CAM requirements under 40 CFR Section 64.3
Gauge Pressure Requirement: 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; Also meets CAM requirements under 40 CFR Section 64.3
Loadings: 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 40 CFR 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
Operation Requirement: 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
Operation Requirement: 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
Operation Requirement: At all times, including periods of startup, shutdown, and malfunction, owners and operators shall maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection.	40 CFR Section 60.11(d)
C. MONITORING AND RECORDKEEPING REQUIREMENTS	hr
Monthly Inspections: 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; Also meets CAM requirements under 40 CFR Section 64.7
Leak Repairs: Each detection of a leak shall be recorded and the source of the leak repaired within 15 days after each inspection.	40 CFR Section 60.502(j); Minn. R. 7011.1550; Also meets CAM requirements under 40 CFR Section 64.7

TABLE A: LIMITS AND OTHER REQUIREMENTS

01/04/06

Facility Name: Magellan Pipeline Co LP - St Paul

Permit Number: 12300070 - 003

Recordkeeping: 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 or equivalent method. Trucks tested in accordance with 40 CFR Section 63.425(e) are considered to meet this requirement. This documentation shall include, as a minimum, the following information: (1) Test title: Gasoline Delivery Tank Pressure Test -EPA Reference Method 27. (2) Tank owner and address. (3) Tank identification number. (4) Testing location. (5) Date of test. (6) Tester name and signature. (7) Witnessing inspector, if any: Name, signature, and affiliation. (8) Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs).	40 CFR Section 60.505(b); Minn. R. 7011.1550
Recordkeeping: 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
Leak Recordkeeping: A record of each monthly leak inspection shall be kept on file at the terminal for at least five (5) 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 the repair interval >15 days) 5. Inspector name and signature.	40 CFR Section 60.505(c); Minn. R. 7011.1550; Minn. R. 7007.0800, subp. 5
Recordkeeping of Notifications: The Permittee shall keep documentation of all notifications required under 40 CFR Section 60.502(e)(4) on file at the terminal for at least five (5) years.	40 CFR Section 60.505(d); Minn. R. 7011.1550
Component Recordkeeping: The Permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system on site for at least five (5) years.	40 CFR Section 60.505(f); Minn. R. 7011.1550
Correction Actions: If the gauge pressure in the delivery tank exceeds 4,500 pascals (450 mm of water) during product loading, the Permittee shall take corrective action as soon as possible according to the control equipment manufacturer's specifications and the facility operation and maintenance plan. The Permittee shall keep a log of all corrective actions taken with records entered upon completion of each corrective action. All situations warranting corrective actions are deviations, the Permittee shall report the deviations in the semiannual deviations report as required in the total facility section of this permit.	Minn. R. 7007.0800, subp. 2; Also meets CAM requirements under 40 CFR Section 64.7(d)
Semiannual Inspection: The Permittee shall inspect the vapor combustion unit (VCU) at least semiannual and shall maintain a written record of the inspection and any action resulting from the inspection.	Minn. R. 7007.0800, subps. 4, 5, and 14; Also meets CAM requirements under 40 CFR Section 64.3 (b)(4)
Operation and Maintenance (O & M) Plan: The Permittee shall operate and maintain the vapor combustion unit in accordance with the facility O & M Plan and the control equipment manufacturer's specifications. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	Minn. R. 7007.0800, subps 2 and 14; Also meets CAM requirements under 40 CFR Section 64.8
D. POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
The Permittee shall operate the enclosed flare (CE 002) during loading to control emissions from the Bottom Loading Rack (EU 002). The Permittee shall document periods of non-operation of the control equipment.	Minn. R. 7007.0800, subps. 2 and 14
Recordkeeping Requirement: The Permittee shall record each startup, shutdown, or malfunction of the vapor combustion unit.	40 CFR Section 60.7(b)
E. PERFORMANCE TESTING REQUIREMENTS	hdr
Performance Test: due before end of each 60 months starting 11/18/2002 for total organic compounds, and pressure according to 40 CFR Section 60.502(h). The first performance test required under this condition was completed on November 18, 2002.	40 CFR Section 60.502(h); Minn. R. 7017.2020, subp. 1; Also meets CAM requirements under 40 CFR Section 64.3(c)
Performance Test Notifications and Submittals; 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 day before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy or CD: due 105 day 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. 7017.2030, subp. 1-4; Minn. R. 7017.2018 and Minn. R. 7017.2035, subp. 1-2

TABLE A: LIMITS AND OTHER REQUIREMENTS

01/04/06

Facility Name: Magellan Pipeline Co LP - St Paul
Permit Number: 12300070 - 003

F. REPORTING REQUIREMENT	hdr
Corrective Actions Reporting: All situations warranting corrective actions are deviations, the Permittee shall report the deviations in the semiannual deviations report as required in the total facility section of this permit.	Minn. R. 7007.0800, subp. 2; Also meets CAM requirements under 40 CFR Section 96.9(c)

TABLE A: LIMITS AND OTHER REQUIREMENTS

01/04/06

Facility Name: Magellan Pipeline Co LP - St Paul

Permit Number: 12300070 - 003

Subject Item: CE 001 Flaring**Associated Items:** EU 001 Tank Truck Bottom Load - MPL w/Vapor Combustor Control

What to do	Why to do it
A. POLLUTANT LIMIT	hdr
Visible Emission: The flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total 5 minutes in any 2 consecutive hours, as determined by Method 22. This limit does not apply during startup, shutdown, or malfunction.	40 CFR Section 60.18(c)(1); 40 CFR Section 60.18(c)(2); Minn. R. 7011.0050
B. OPERATIONAL REQUIREMENTS	hdr
Operation Limit: Flares must meet maximum velocity and minimum heat content requirements.	40 CFR Section 60.18(c)(3)
Operation Requirement: Flares shall be steam-assisted, air-assisted, or non-assisted.	40 CFR Section 60.18(c)(6)
Flare Operation: The flare shall be operated with pilot flame at all times when emissions may be vented to them.	Title I Condition: limit taken to avoid major source classification under 40 CFR Section 63.2; 40 CFR Section 60.18(c)(2); 40 CFR Section 60.18(e); Also meets CAM requirements under 40 CFR Section 64.7
C. MONITORING AND RECORDKEEPING REQUIREMENTS	hdr
Monitoring of the flare: The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame.	Title I Condition: limit taken to avoid major source classification under 40 CFR Section 63.2; 40 CFR Section 60.18(f)(2); Minn. R. 7011.0050; Also meets CAM requirements under 40 CFR Section 64.3
Monitoring: The Permittee shall used Method 22 to determine the compliance of the flare with the opacity limit. The observation period is 2 hours and shall be used according to Method 22.	40 CFR Section 60.18(f)(1); Minn. R. 7011.0050; Also meets CAM requirements under 40 CFR Section 64.3(c)
The Permittee shall operate and maintain the flare 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 staff and MPCA staff.	Minn. R. 7007.0800, subps. 2 and 14; Also meets CAM requirements under 40 CFR Section 64.8
Correction Actions of Visible Emissions (VE): If VE are observed, the Permittee shall take corrective action to eliminate the VE. If VE continue, the Permittee shall proceed to perform Method 22 for 2 hours. The Permittee shall keep a log of the Method 22 observations and of all corrective actions taken with records entered upon completion of each corrective action.	Minn. R. 7007.0800, subp. 2; Also meets CAM requirements under 40 CFR Section 64.7(d)
All situations warranting corrective actions are deviations, the Permittee shall report the deviations in the semiannual deviations report as required in the total facility section of this permit.	
D. POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
The Permittee shall operate the enclosed flare (CE 001) during loading to control emissions from the Bottom Loading Rack (EU 001). The Permittee shall document periods of non-operation of the control equipment.	Minn. R. 7007.0800, subps. 2 and 14
Recordkeeping Requirement: The Permittee shall record each startup, shutdown, or malfunction of the flare.	40 CFR Section 60.7(b)
E. REPORTING REQUIREMENT	hdr
Corrective Actions Reporting: All situations warranting corrective actions are deviations, the Permittee shall report the deviations in the semiannual deviations report as required in the total facility section of this permit.	Minn. R. 7007.0800, subp. 2; Also meets CAM requirements under 40 CFR Section 64.9(c)

TABLE A: LIMITS AND OTHER REQUIREMENTS

01/04/06

Facility Name: Magellan Pipeline Co LP - St Paul

Permit Number: 12300070 - 003

Subject Item: CE 002 Flaring**Associated Items:** EU 002 Tank Truck Bottom Load - Flint Hills Resources (FHR) w/Vapor Combustor Control

What to do	Why to do it
A. POLLUTANT LIMIT	hdr
Visible Emission: The flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total 5 minutes in any 2 consecutive hours, as determined by Method 22. This limit does not apply during startup, shutdown, or malfunction.	40 CFR Section 60.18(c)(1); 40 CFR Section 60.18(c)(2); Minn. R. 7011.0050
B. OPERATIONAL REQUIREMENTS	hdr
Operation Limit: Flares must meet maximum velocity and minimum heat content requirements.	40 CFR Section 60.18(c)(3)
Operation Requirement: Flares shall be steam-assisted, air-assisted, or non-assisted.	40 CFR Section 60.18(c)(6)
Flare Operation: The flare shall be operated with pilot flame at all times when emissions may be vented to them.	Title I Condition: limit taken to avoid major source classification under 40 CFR Section 63.2; 40 CFR Section 60.18(c)(2); 40 CFR Section 60.18(e); Also meets CAM requirements under 40 CFR Section 64.7
C. MONITORING AND RECORDKEEPING REQUIREMENTS	hdr
Monitoring of the flare: The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame.	Title I Condition: limit taken to avoid major source classification under 40 CFR Section 63.2; 40 CFR Section 60.18(f)(2); Minn. R. 7011.0050; Also meets CAM requirements under 40 CFR Section 64.3
Monitoring: The Permittee shall use Method 22 to determine the compliance of the flare with the opacity limit. The observation period is 2 hours and shall be used according to Method 22.	40 CFR Section 60.18(f)(1); Minn. R. 7011.0050; Also meets CAM requirements under 40 CFR Section 64.3(c)
The Permittee shall operate and maintain the flare 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 staff and MPCA staff.	Minn. R. 7007.0800, subps. 2 and 14; Also meets CAM requirements under 40 CFR Section 64.8
Correction Actions of Visible Emissions (VE): If VE are observed, the Permittee shall take corrective action to eliminate the VE. If VE continue, the Permittee shall proceed to perform Method 22 for 2 hours. The Permittee shall keep a log of the Method 22 observations and of all corrective actions taken with records entered upon completion of each corrective action.	Minn. R. 7007.0800, subp. 2; Also meets CAM requirements under 40 CFR Section 64.7(d)
All situations warranting corrective actions are deviations, the Permittee shall report the deviations in the semiannual deviations report as required in the total facility section of this permit.	
D. POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
The Permittee shall operate the enclosed flare (CE 002) during loading to control emissions from the Bottom Loading Rack (EU 002). The Permittee shall document periods of non-operation of the control equipment.	Minn. R. 7007.0800, subps. 2 and 14
Recordkeeping Requirement: The Permittee shall record each startup, shutdown, or malfunction of the flare.	40 CFR Section 60.7(b)
E. REPORTING REQUIREMENT	hdr
Corrective Actions Reporting: All situations warranting corrective actions are deviations, the Permittee shall report the deviations in the semiannual deviations report as required in the total facility section of this permit.	Minn. R. 7007.0800, subp. 2; Also meets CAM requirements under 40 CFR Section 64.9(c)

TABLE B: SUBMITTALS

01/04/06

Facility Name: Magellan Pipeline Co LP - St Paul
Permit Number: 12300070 - 003

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:

AQ Permit Technical Advisor
Industrial 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:

AQ Compliance Tracking Coordinator
Industrial 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

01/04/06

Facility Name: Magellan Pipeline Co LP - St Paul
Permit Number: 12300070 - 003

What to send	When to send	Portion of Facility Affected
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility

TABLE B: RECURRENT SUBMITTALS

01/04/06

Facility Name: Magellan Pipeline Co LP - St Paul

Permit Number: 12300070 - 003

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year starting 01/12/1998. The first 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. If no deviations have occurred, the Permittee shall submit the report stating no deviations.	Total Facility
Compliance Certification	due 31 days after end of each calendar year starting 01/12/1998 (for the previous calendar year). To be submitted on a form approved by the Commissioner, both to the Commissioner and to the US EPA regional office in Chicago. This report covers all deviations experienced during the calendar year.	Total Facility

APPENDIX MATERIAL

Facility Name: Magellan Pipeline Co., L.P. - St Paul
Permit Number: 12300070-003

Appendix B

Insignificant Emission Units and Applicable Requirements

Description of Activity	Applicable Insignificant Activities Requirement	Likely Applicable Requirement
Laboratory for QC of liquid petroleum products and ethanol.	Minn. R. 7007.1300, subp. 3.G.	Minn. R. 7011.0715/0735
Occasional Tank/Pipe Painting	Minn. R. 7007.1300, subp. 3. K.	Minn. R. 7011.0715/0735
Tank Cleaning for short duration	Minn. R. 7007.1300, subp. 3. I	Minn. R. 7011.0715/0735
Portable water treatment equipment, including, but not limited to, air stripper, carbon filter units, and chemical/biological units	Minn. R. 7007.1300, subp. 3. I	Minn. R. 7011.0715/0735
Water storage tank	Minn. R. 7007.1300, subp. 3. E	Minn. R. 7011.1505
Fuel bulk additive storage tanks 5 - @ 1,000 gals/each 2 - @ 2,000 gals/each 4 - @ 6,000 gals/each 1- @ 8,000 gals 4 - @ 500 gals/each 1 – @ 12,000 gals 1 - @ 4,000 gals	Minn. R. 7007.1300, subp. 3.I	Minn. R. 7011.1505
Natural Gas Furnace (203,000 Btu/hr)	Minn. R. 7007.1300, subp. 3.A.	Minn. R. 7011.0510
Pressure Vessels- Tanks 904 and 951	Minn. R. 7007.1300, subp. 3. E.	Minn. R. 7011.1505
Ethanol Off Loading	Minn. R. 7007.1300, subp. 4	Minn. R. 7011.0105
Fugitive Emissions from Roads and Parking Lots	Minn. R. 7007.1300, subp. 3. J	Minn. R. 7011.0150

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 12300070-003

This technical support document 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 preliminary determination to issue the permit.

1. General Information

1.1. Applicant and Stationary Source Location:

Applicant/Address	Stationary Source/Address (SIC Code: 4613)
Magellan Pipeline Company, L.P. P.O. Box 22186 MD 27-3 Tulsa, Oklahoma 74121-2186	Magellan Pipeline Company, L.P. St. Paul Terminal 2451 West County Road C St. Paul, Minnesota 55113 Ramsey County
Contact: Mr. Ryan Bowers Phone: (918) 574-7471	

1.2. Description of the Facility

Magellan Pipeline Company, L.P. formally known as Williams Pipeline Company owns and operates a liquid petroleum bulk storage and terminal interstate pipeline in St. Paul, Minnesota. The facility consists of storage tanks, pump stations, tank truck loading racks with vapor controller and vapor processing systems, soil vapor extraction unit and insignificant emission units. The terminal receives and transports petroleum products to other terminals through an interstate pipeline distribution network.

The main sources of air emissions are volatile organic compounds (VOCs) from this facility. The facility is a major source under the federal operation permits program (40 CFR pt. 70) and major source under federal New Source Review (NSR). The permit limits hazardous air pollutants (HAPs) emissions such that the facility is an area source under the National Emissions Standards for Hazardous Air Pollutants (NESHAPs, 40 CFR pt. 63).

1.3. Description of the Permit Action

This is a Part 70 Reissuance Permit

1.4 Description of any Changes Allowed with this Permit Issuance

No changes are authorized by this permit action. The only changes to the permit are including the Compliance Assurance Monitoring (CAM) requirements and administrative in nature – removal of completed items, updating permit template language and reorganizing the order of the permit conditions for clarity.

1.5 Description of All Amendments Issued Since the Issuance of the Last Total Facility Permit

Permit Number and Issuance Date	Action Authorized
12300070-002 March 31, 2005	The name changed of the facility.

1.5. Facility Emissions:

Table 1. Total Facility Potential to Emit Summary

	PM tpy	PM ₁₀ tpy	SO ₂ tpy	NO _x tpy	CO tpy	VOC tpy	Single HAP tpy	All HAPs tpy
Total Facility Limited Potential Emissions	0.00	0.00	0.00	28.08	70.22	245.3	2.75	8.64
Total Facility Actual Emissions (2004)	0.00	0.00	0.00	10.74	26.86	104.46	HAPs not reported in emission inventory	

Table 2. Facility Classification

Classification	Major/Affected Source	Synthetic Minor	Minor
PSD	VOC(Ozone)		PM, PM ₁₀ , NO _x , CO and SO ₂
Part 70 Permit Program	VOC		PM, PM ₁₀ , NO _x , CO and SO ₂
Part 63 NESHAP		HAP	

2. Regulatory and/or Statutory Basis

New Source Review (NSR)

The facility is an existing major source under New Source Review (40 CFR § 52.21) regulations. No changes subject to NSR are authorized by this permit.

Part 70 Permit Program

The facility is a major source under the Part 70 permit program.

New Source Performance Standards (NSPS)

The facility is subject to Standards of Performance for Bulk Gasoline Terminals, 40 CFR pt. 60, subp. XX

National Emission Standards for Hazardous Air Pollutants (NESHAP)

The facility is limited based on the NSPS requirements and to operate pollution control equipment, which inherently limits their Hazardous Air Pollutant (HAP) emissions to less than 10 tpy for any single HAP and less than 25 tpy for combined HAPs. Thus, no NESHAPs apply.

Minnesota State Rules

Portions of the facility are subject to the following Minnesota Standards of Performance:

- *Minn. R. 7011.1505 Standards of Performance for Storage Vessels*
- *Minn. R. 7011.1550 Standards of Performance for New Bulk Gasoline Terminals*

Compliance Assurance Monitoring (CAM)

CAM rule (40 CFR pt. 64) applies to any facility that operates emission control devices subject to federally enforceable regulations promulgated prior to 1990. On or after April 20, 1998, the Permittee was required to submit CAM information as part of their application for the reissuance of a Part 70 permit. On July 26, 2002, the Permittee submitted their CAM plan with their application for renewal.

Table 3. Regulatory Overview of Facility

EU, GP, or SV	Applicable Regulations	Comments:
Total Facility (TF)	Title I Condition: 40 CFR § 52.21; Minn. R. 7007.3000	The facility is one of the 28 source categories described in 40 CFR § 52.21 (b)(1)(i)(a); therefore the facility is subject to the 100 tons per year major source definition.
TF	Minn. R. chs. 7002, 7007, 7009, 7011, 7019 and 7030	Table A contains requirements that apply to all facilities in Minnesota. Reporting and monitoring requirements are contained in Table B of the permit.
EU 001 and 002	40 CFR pt. 60, subp. XX; Minn. R. 7011.1550	Standards of Performance for Bulk Gasoline Terminals. This is an existing source under this rule using the total

		organic compound limit.
CE 001 and 002	Title I Condition: To avoid 40 CFR Section 63.2; Minn. R. 7007.3000; Minn. R. 7007.0800	The Permittee will operate the flares and will comply with the requirements specified in the permit.

The language 'This is a state-only requirement and is not enforceable by the EPA Administrator and citizens under the Clean Air Act' refers to permit requirements that are mandated by state law rather than by the federal Clean Air Act. The language is to clarify the distinction between permit conditions that are required by federal law and those that are required by state law. State law requirements are not enforceable by U.S. EPA or by citizens under the federal Clean Air Act, but are fully enforceable by the MPCA and citizens under provisions of state law.

3. Technical Information

Attachments 1-5 of this TSD contains calculations and supporting information prepared by both the Permittee and the MPCA staff.

3.1. CAM Applicability

Magellan Pipeline Company, L.P. submitted a CAM Plan and Operation and Maintenance Plan (see attached) for its St. Paul Terminal. The tank truck bottom loadings with vapor combustor controls and flares (EU 001 and EU 002) are subject to CAM. The facility operates emission control devices subject to federally enforceable regulations which were promulgated before 1990, "40 CFR pt. 60, subp. XX". The permit includes the provisions that require the Permittee to comply with CAM requirements. As indicated in "Technical Guidance Document, Compliance Assurance Monitoring" by Environmental Protection Agency (EPA), requirements for flares contained in 40 CFR Section 60.18 (general control device requirements) have been designated as presumptively acceptable monitoring for CAM by EPA; therefore, for existing flares no additional justification is required. Monthly inspections of the vapor collection systems are indicators monitored when vapor recovery systems are used for VOC control; therefore, the justification is acceptable.

Justification – Meets CAM requirements under 40 CFR Section 64. The permit contains requirements for the vapor combustor units (VCUs) monthly inspections and recordkeeping and for the flares continuous monitoring for the presence of a flame. Also, the Permittee is required to operate and maintain the VCUs and the flares according to the control equipment manufacturer's specifications and the facility's operation and maintenance plan. The Permittee is further required to operate the control equipment monitoring equipment at all times the control equipment is required to operate. In addition, the Permittee will continue to verify the control efficiency of the VCUs by performing a performance test by November 18, 2007, and thereafter, every 60 months, unless the commissioner requests an alternative.

3.2. Calculations of Potential to Emit

Emission Calculation Discussion

1. Tank Truck Bottom Loadings w/vapor combustion controls and flares

The PTE calculations were based on EPA approved emission factors from AP-42 Chapter 5.2, Transportation and Marketing of Petroleum Liquids.

a. Loading VOC losses are the primary source of evaporative emissions. VOC emissions for loading petroleum liquid were determined using the following equation:

$$L_L = 12.46 (SPM/T)$$

Where

L_L = loading loss in pounds per 1000 gallons of liquid loaded

S = saturation factor + submerged loading with dedicated normal service, 0.6

P = true vapor pressure of liquid loaded (psia)

M = molecular weight of vapors, (lb/lb mole)

T = temperature of bulk liquid loaded, ° R (° F + 460)

For the RVGP 10 Gasoline Loading

$$L_L = 12.46 (0.6)(3.8607)(66)/(44.72+460) = 3.774 \text{ lb}/10^3 \text{ gal}$$

Maximum capacity of the loading rack = 96,000 gallons per hour

Total loading losses = $3.774 \text{ lb}/10^3 \text{ gal} (96,000 \text{ gals/hr})(8760 \text{ hrs/yr})(\text{ton/yr}) = 1586.9 \text{ tons/yr}$ (uncontrolled)

With the control efficiency of 94.5 for VCU (based on performance test): $1586.9 (1-0.945) = 87.28 \text{ tons/yr}$ per loading rack

Total loading Losses = 87.28 tons/yr for gasoline loaded per loading rack.

The company also loads the following fuels: Jet kersonse, No. 2 fuel oil, and No. 1 fuel oil.

b. However, there is an underlying applicable requirement, the NSPS for Bulk Gasoline Terminals that limits VOC emissions to 35 mg/liter of VOC per liter of gasoline loaded.

$$(35 \text{ mg/l}) \times (3.7854 \text{ l/gal}) \times (1 \text{ gal}/1000 \text{ mg}) \times (1 \text{ kg}/1000 \text{ gal}) \times (2.2046 \text{ lb/kg}) = 0.00029 \text{ lb/gal}$$

$$(0.00029 \text{ lb/gal}) \times (96,000 \text{ gal/hr}) \times (8760 \text{ hrs/yr}) \times (\text{ton}/2000 \text{ lbs}) = 122.0 \text{ tons/yr}$$

With control efficiency of the flare of 95 % $[(122 \text{ tons/yr}) (1-0.95)] = 6.01 \text{ tons/yr}$ per loading rack.

The flare is still necessary as an indicator for compliance with the NSPS requirements and to avoid major source classification under 40 CFR pt. 63 (NESHAPs). The control efficiencies

were applied to determine potential emissions; therefore, there are applicable requirements associated with the flares. The flare emissions were based the combustion of natural gas in the flare pilots. These emissions are insignificant using emission factors from AP-42, "Natural Gas Combustion", Section 1.4.

2. Off Loading of Ethanol Emission Calculations: The VOC emissions from off loading were determined to be insignificant emissions. See VOC emission calculations attached. The VOC emissions for the ethanol storage tanks were calculated using the Tank Program 4.0

3. Fugitive VOC Emission Calculations: The VOC emissions were calculated using the Marketing Terminal Average Emission Factors from EPA Protocol for Equipment Leak Emission Estimates, EPA-453R/-95-017, November 1995, Table 2-3). See calculations attached.

4. Tank Emission Calculations: There are no applicable performance standards for the tanks because the tanks were installed prior to July 7, 1969. The pervious total facility permit tanks PTE were calculated using TANKS version 2.0. The emission calculations were updated using the TANKS version 4.0 which calculated the emissions higher; therefore PTE summary for the tanks were updated to reflect the increase in emissions.

5. Remediation System: The soil vapor extraction unit was installed on October 1994 to reduce hydrocarbon impacts in the air from the soil and groundwater. On July 13, 2005, Magellan received a letter from the MPCA, Remediation Division, stating the MPCA staff has determined that the investigation and cleanup has adequately addressed petroleum release at the site; therefore, the release site file has been closed. See letter attached. In addition, all equipment associated with the soil vapor extraction unit has been removed from the facility.

6. Hazardous Air Pollutants (HAP) Emission Calculations:

HAP emission calculations were based on the HAP content of gasoline vapors (Gasoline Distribution Industry (Stage I) - Background Information for Proposed Standards, November 1994) EPA-453/R-94-002a).

The HAP content of normal gasoline by weight percent is:

Hexane	1.6
Benzene	0.9
Toluene	1.3
2,2,4 Trimethylpentane	0.8
Xylenes	0.5
Ethyl Benzene	0.1

For Example: PTE for hexane

$(1.6 \text{ tons of hexane}/100 \text{ tons of VOC}) \times (52.37 \text{ tons of VOC/yr}) = 0.84 \text{ tons per year of hexane}$

The HAP destruction efficiency of the vapor collection/destruction system is assumed to be equivalent to the VOC destruction efficiency. This is a reasonable assumption (Control Technologies for HAP, U.S. Environmental Protection Agency /625/6-91/014, June 1991).

3.3. 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 4 summarizes the periodic monitoring requirements for those emission units for which the monitoring required by the applicable requirement is nonexistent or inadequate.

Table 4. Periodic Monitoring

Emission Unit or Group	Requirement (basis)	Additional Monitoring	Discussion
Tank Truck Bottoms/w VCUs (EU 001 and EU 002)	<p>TOC \leq 35 milligrams/liter of TOC per liter of gasoline loaded (NSPS limit, 40 CFR pt. 60, subp. XX)</p> <p>Gauge Pressure < 4,500 pascals during tank truck loading (40 CFR pt. 60, subp. XX)</p>	<p>Recordkeeping: O & M inspections on a monthly basis, gauge pressure monitoring on a continuous basis.</p> <p>Performance Test: To verify control efficiency of the VCU</p>	<p>Monitoring the gauge pressure to be less than 4,500 pascals (450 mm of water) in the delivery tank on a continuous basis and recordkeeping (daily, monthly inspections of the vapor collection system, leak repairs and corrective actions) and O & M records are indicators to have reasonable assurance of compliance.</p> <p>Performance test will be done no later than November 18,</p>

Emission Unit or Group	Requirement (basis)	Additional Monitoring	Discussion
			2007, for control efficiency of the VCU, and thereafter every 60 months.
Flares (CE 001 and CE 002)	<p>Visible Emissions (VE): With no VE, except for periods not to exceed a total 5 minutes in any 2 consecutive hours. (40 CFR Section 60.18)</p> <p>Flare Operation: must be operated with pilot flame at all times when emissions may be vented to them (limit to avoid classification as a major source under 40 CFR Section 63.2)</p>	<p>The presence of a flare pilot flame will be monitored using a thermocouple or any other equivalent to detect the presence of a flame.</p> <p>Recordkeeping: VE checks will be done on a daily basis.</p>	<p>Magellan will use an infrared camera to monitor the presence of a pilot flame which will be done on a continuous basis. The design requirements of 40 CFR section 63.11 (b)(4) require that the flare be designed for and operated with no visible emissions except for periods not to exceed a total of 5 minutes any 2 consecutive hours. Performing a Method 22 for every 2-hour period is neither practical nor necessary; therefore, the owner or operator will check for visible emissions on a daily basis. If there are any visible emissions observed, the company will take corrective action; if visible emissions continue, the company will proceed to perform a Method 22 test for 2 hours.</p>

3.4 Insignificant Activities

Magellan Pipeline Company, L.P. has several operations which are classified as insignificant activities. These are listed in Appendix B to the permit. The permit is required to include periodic monitoring for all emission units, including insignificant emission units (IEU), per EPA guidance. The insignificant activities at the Facility are only subject to general applicable requirements. It is our belief that IEU's listed in Appendix B to the permit associated with inconsequential environmental impacts and present little potential for violations of generally applicable requirements; therefore, no additional periodic monitoring will be required.

3.5 Community Involvement Process

This permit action is a reissuance of a Part 70 Operating permit; therefore, it is subject to the Community Involvement Process (CIP). The initial information gathering phase revealed that no complaints have been received by the MPCA; therefore this project does not require continuing further with the CIP.

3.6 Permit Organization

In general, the permit meets the MPCA Delta Guidance for ordering and grouping of requirements. One area where this permit deviates slightly from Delta guidance is in the use of appendices. While appendices are fully enforceable parts of the permit, in general, any requirement that the MPCA thinks should be tracked (e.g., limits, submittals, etc.), should be in Table A or B. The main reason is that the appendices are word processing sections and are not part of the tracking system. Violation of the appendices can be enforced, but the computer system will not automatically generate the necessary enforcement notices or documents. Staff must generate these.

3.4 Comments Received

Public Notice Period: November 18, 2005 – December 19, 2005

EPA 45-day Review Period: November 18, 2005 – January 3, 2006

Comments were not received from the public during the public notice period. Comments were not received from EPA during their review period.

4. Conclusion

Based on the information provided by [Magellan Pipeline Company, L.P. -St. Paul](#), the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 12300070-003 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:

Amrill Okonkwo (permit writer/engineer)

[Bob Berg](#) (enforcement)

Bonnie Nelson (peer reviewer)

- Attachments:
1. [Facility Emission Summary](#)
 2. Facility Description and CD-01 Forms
 3. [PTE Summary and Calculations](#)
 4. Compliance Assurance Monitoring Plan

5. Site Closure Letter

ATTACHMENT 1
FACILITY EMISSION SUMMARY
(Paper Copy Only)

ATTACHMENT 2
FACILITY DESCRIPTION AND CD-01 FORMS
(Paper Copy Only)

ATTACHMENT 3
PTE SUMMARY AND CALCULATIONS
(Paper Copy Only)

ATTACHEMENT 4
COMPLIANCE ASSURANCE MONITORING PLAN
(Paper Copy Only)

ATTACHEMENT 5
SITE CLOSURE LETTER
(Paper Copy Only)