



State of Mississippi



FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

THIS CERTIFIES

Genesis Rail Services LLC, Natchez Terminal
120 L E Barry Road
Natchez, MS
Adams County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with the Federal Clean Air Act and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. set., Mississippi Code of 1972), the regulations and standards adopted and promulgated thereunder, and the State Implementation Plan for operating permits for synthetic minor sources.

Mississippi Environmental Quality Permit Board

Mississippi Department of Environmental Quality

Issued/Modified: JAN 28 2015

Expires: OCT 31 2018

Permit No. 0040-00054

Agency Interest # 154

Table of Contents

Subject Item Inventory.....i

Facility Requirements.....1

General Information.....A-1

Other Relevant Documents:

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Genesis Rail Services LLC, Natchez Terminal

Subject Item Inventory

Permit Number:0040-00054

Activity ID No.: PER20140001

Subject Item Inventory:

ID	Designation	Description
AI154		Liquid Terminal Facility
EQPT14	AB-001	10.5 MMBTU/hr Natural Gas-Fired Boiler
EQPT15	AB-002	31.478 MMBTU/hr Natural Gas-Fired Boiler
EQPT25	AB-003	31.478 MMBTU/hr Natural Gas-Fired Boiler
AREA1	AF-001	Facility Fugitives
EQPT26	AI-003	Dilbit/Bitumen Barge Loading controlled by a Vapor Combustion Unit (VCU)
EQPT27	AI-004	Railcar Steaming controlled with a Sulfatreat Catalyst System
EQPT32	AI-005	Tank Roof Landing Operations
EQPT33	AI-006	Tank Cleaning Operations
EQPT11	AI-001	Diluent Rail Loading controlled by a Vapor Combustion Unit (VCU)
EQPT12	AI-002	Dilbit/Bitumen Barge Loading controlled by a Sulfatreat Catalyst System for H2S removal
EQPT1	AT-001	30,000 barrel (1,260,000 gallon) Internal Floating Roof Dilbit/Bitumen Storage Tank (Facility ID 30020)
EQPT28	AT-002	30,000 barrel (1,260,000 gallon) Internal Floating Roof Dilbit/Bitumen Storage Tank (Facility ID 30021)
EQPT29	AT-003	30,000 barrel (1,260,000 gallon) Internal Floating Roof Dilbit/Bitumen Storage Tank (Facility ID 30022)
EQPT4	AT-004	30,000 barrel (1,260,000 gallon) Internal Floating Roof Diluent/Dilbit/Bitumen Storage Tank (Facility ID 30031)
EQPT30	AT-005	30,000 barrel (1,260,000 gallon) Internal Floating Roof Diluent/Dilbit/Bitumen Storage Tank (Facility ID 30032)
EQPT6	AT-006	36,000 barrel (1,512,000 gallon) Internal Floating Roof Dilbit/Bitumen Storage Tank (Facility ID 55010)
EQPT31	AT-007	36,000 barrel (1,512,000 gallon) Internal Floating Roof Dilbit/Bitumen Storage Tank (Facility ID 55011)
EQPT22	AT-008	36,000 barrel (1,512,000 gallon) Internal Floating Roof NaOH Storage Tank (Facility ID 55012)

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Genesis Rail Services LLC, Natchez Terminal

Subject Item Inventory

Permit Number:0040-00054

Activity ID No.: PER20140001

ID	Designation	Description
EQPT9	AT-009	100,000 barrel (4,200,000 gallon) Internal Floating Roof Dilbit/Bitumen Storage Tank (Facility ID 100051)

Subject Item Groups:

ID	Description	Components
GRPT2	Kb Tank Requirements	EQPT1 30,000 barrel (1,260,000 gallon) Internal Floating Roof Dilbit/Bitumen Storage Tank (Facility ID 30020)
		EQPT28 30,000 barrel (1,260,000 gallon) Internal Floating Roof Dilbit/Bitumen Storage Tank (Facility ID 30021)
		EQPT29 30,000 barrel (1,260,000 gallon) Internal Floating Roof Dilbit/Bitumen Storage Tank (Facility ID 30022)
		EQPT4 30,000 barrel (1,260,000 gallon) Internal Floating Roof Diluent/Dilbit/Bitumen Storage Tank (Facility ID 30031)
		EQPT30 30,000 barrel (1,260,000 gallon) Internal Floating Roof Diluent/Dilbit/Bitumen Storage Tank (Facility ID 30032)
		EQPT6 36,000 barrel (1,512,000 gallon) Internal Floating Roof Dilbit/Bitumen Storage Tank (Facility ID 55010)
		EQPT31 36,000 barrel (1,512,000 gallon) Internal Floating Roof Dilbit/Bitumen Storage Tank (Facility ID 55011)
		EQPT9 100,000 barrel (4,200,000 gallon) Internal Floating Roof Dilbit/Bitumen Storage Tank (Facility ID 100051)
GRPT3	Fuel Burning Requirements	EQPT14 10.5 MMBTU/hr Natural Gas-Fired Boiler
		EQPT15 31.478 MMBTU/hr Natural Gas-Fired Boiler
		EQPT25 31.478 MMBTU/hr Natural Gas-Fired Boiler
		EQPT26 Dilbit/Bitumen Barge Loading controlled by a Vapor Combustion Unit (VCU)
		EQPT11 Diluent Rail Loading controlled by a Vapor Combustion Unit (VCU)
GRPT5	NSPS Dc Requirements	EQPT14 10.5 MMBTU/hr Natural Gas-Fired Boiler
		EQPT15 31.478 MMBTU/hr Natural Gas-Fired Boiler

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Genesis Rail Services LLC, Natchez Terminal

Subject Item Inventory

Permit Number:0040-00054

Activity ID No.: PER20140001

ID	Description	Components
GRPT5	NSPS Dc Requirements	EQPT25 31.478 MMBTU/hr Natural Gas-Fired Boiler

Receiving Stream Relationships:

Subject Item	Relationship	Receiving Stream
AI 154 Liquid Terminal Facility	Discharges Into	Mississippi River

KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

MAFO = Animal Feeding Operation

RPNT = Release Point

WDPT = Withdrawal Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

IMPD = Impoundment

PCS = PCS

TRMT = Treatment

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Genesis Rail Services LLC, Natchez Terminal

Facility Requirements

Permit Number:0040-00054

Activity ID No.: PER20140001

Page 1 of 13

AI0000000154 Liquid Terminal Facility:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Hydrogen sulfide	Hydrogen sulfide: For Emission Points AI-002, AI-003, and AI-004, the permittee shall not cause or permit the emission of any gas stream which contains hydrogen sulfide in excess of one grain per 100 standard cubic feet. Gas streams containing hydrogen sulfide in excess of one grain per 100 standard cubic feet shall be incinerated at temperatures of no less than 1600 degrees F for a period of no less than 0.5 seconds, or processed in such manner which is equivalent to or more effective for the removal of hydrogen sulfide. [11 Miss. Admin. Code Pt. 2, R. 1.4.B(2)]
L-2		For Emission Points AI-001 and AI-003, the permittee shall maintain a minimum temperature of 400 degrees F in the Vapor Combustion Unit during loading. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
L-3		For Emission Point AI-001, the permittee shall limit railcar loading of Diluent to 419,750 bbl/yr on a 12-month rolling total. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
L-4		For Emission Points AI-001 and AI-003, the Vapor Combustion Unit shall be maintained and operated at all times while railcar or barge loading is taking place. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
L-5		For Emission Points AI-002 and AI-003, the permittee shall limit VOC emissions from barge loading to 71.90 tons per year on a 12-month rolling total. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
L-6		For Emission Point AI-002, the catalyst system or the Vapor Combustion Unit shall be maintained and operated when barge loading is occurring and H ₂ S emissions as measured by personal gas monitors exceed 10 ppm. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
L-7		For Emission Point AI-004, the catalyst system shall be maintained and operated when railcar steaming is occurring. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
L-8		Upon receiving U.S. Coast Guard certification of the Vapor Combustion Unit on Emission Point AI-003, the permittee shall limit VOC emission from barge loading (Emission Points AI-002 and AI-003) to 32.74 tons per year on a 12-month rolling total. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Genesis Rail Services LLC, Natchez Terminal

Facility Requirements

Permit Number:0040-00054

Activity ID No.: PER20140001

Page 2 of 13

AI0000000154 (continued):

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		The permittee shall monitor the loading throughput of Diluent, Dilbit, and Bitumen at all times. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]
M-2		For Emission Points AI-002 and AI-004, the permittee shall monitor the H2S in the vent stream at the start and end of loading and every 4 hours in between. H2S breakthrough shall be monitored by a gas detection tube or gas meter and the catalyst shall be replaced when the H2S concentration in the vent stream reaches 4 ppm. The permittee shall record date of each H2S breakthrough and date catalyst is replaced. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]
M-3		For Emission Points AI-001 and AI-003, the permittee shall continuously monitor the temperature in the Vapor Combustion Unit and record the date, time, and duration that it is operated at less than 400 degrees F while loading is occurring. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]

Record-Keeping Requirements:

Condition No.	Condition
R-1	The permittee shall maintain records of the loading throughput of diluent on a daily basis. A 12-month rolling total shall be calculated for each calendar month. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]
R-2	The permittee shall calculate VOC emissions for each calendar month and for each consecutive 12-month period from the bitumen and dilbit loading operations. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]
R-3	The permittee shall keep records of the VOC emissions resulting from the loading of bitumen and dilbit. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]
R-4	For Emission Points AI-002, AI-003, and AI-004, the permittee shall keep records of the H2S concentration in the vent stream. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Genesis Rail Services LLC, Natchez Terminal

Facility Requirements

Permit Number:0040-00054

Activity ID No.: PER20140001

Page 3 of 13

AI0000000154 (continued):

Submittal/Action Requirements:

Condition No.	Condition
S-1	General Condition: Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) working days of the time the deviation began. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]
S-2	Except as otherwise specified herein, the permittee shall Submit a certified annual synthetic minor monitoring report: Due annually, by the 31st of January for preceding calendar year. This report shall address any required monitoring specified in the permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(11).]
S-3	The permittee shall submit certification of construction: Due within thirty (30) days of completion of construction or installation of an approved stationary source or prior to startup, whichever is earlier. The notification shall certify that construction or installation was performed in accordance with the approved plans and specifications. In the event there is any change in construction from the previously approved plans and specifications or permit, the permittee shall promptly notify MDEQ in writing. If MDEQ determines the changes are substantial, MDEQ may require the submission of a new application to construct with "as built" plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an "as built" application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law. [11 Miss. Admin. Code Pt. 2, R. 2.5.D]
S-4	Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. [11 Miss. Admin. Code Pt. 2, R. 2.5.C(2)]

Narrative Requirements:

Condition No.	Condition
T-1	General Condition: Any activities not identified in the application are not authorized by this permit. [Miss. Code Ann. 49-17-29 1.b]
T-2	General Condition: The permittee shall at all times maintain in good working order and operate as efficiently as possible all air pollution control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. [11 Miss. Admin. Code Pt. 2, R. 2.5.A.]
T-3	General Condition: Solids removed in the course of control of air emissions shall be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering state waters without the proper environmental permits. [Miss. Code Ann. 49-17-29 1.a(i and ii)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Genesis Rail Services LLC, Natchez Terminal

Facility Requirements

Permit Number:0040-00054

Activity ID No.: PER20140001

Page 4 of 13

AI0000000154 (continued):

Narrative Requirements:

Condition No.	Condition
T-4	General Condition: Any diversion from or bypass of collection and control facilities is prohibited except as provided for in 11 Miss. Admin. Code Pt.2, R. 1.10, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", [11 Miss. Admin.Code Pt. 2, R.1.10.]
T-5	General Condition: Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule. [11 Miss. Admin.Code Pt. 2, R.2.10.]
T-6	General Condition: The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their authorized representatives, upon the presentation of credentials: (a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit, and (b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emission. [Miss. Code Ann. 49-17-21]
T-7	General Condition: After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to: (a) Violation of any terms or conditions of this permit (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or (c) A change in any condition that required either a temporary or permanent reduction or elimination of authorized air emissions. [11 Miss. Admin.Code Pt. 2, R. 2.2.C.]
T-8	General Condition: This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for this permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of the permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(b).]
T-9	General Condition: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality Office of Pollution Control. [Miss. Code Ann. 49-17-39]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Genesis Rail Services LLC, Natchez Terminal

Facility Requirements

Permit Number:0040-00054

Activity ID No.: PER20140001

Page 5 of 13

AI0000000154 (continued):

Narrative Requirements:

Condition No.	Condition
T-10	General Condition: The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(15)(c).]
T-11	General Condition: Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the air cleaning facility, or from compliance with the applicable statutes of the State, or with local laws, regulations, or ordinances. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(7).]
T-12	General Condition: This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [11 Miss. Admin. Code Pt. 2, R. 2.16.B.]
T-13	General Condition: This permit is for air pollution control purposes only. [11 Miss. Admin.Code Pt. 2, R. 2.1.D(1).]
T-14	General Condition: This permit is a Federally-approved permit to operate a synthetic minor source as described in 11 Miss. Admin. Code Pt. 2, R. 2.4.D [11 Miss. Admin.Code Pt. 2, R. 2.4.D.]
T-15	General Condition: The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. [11 Miss. Admin.Code Pt. 2, R. 2.1.D(7).]
T-16	General Condition: The permittee shall furnish to MDEQ within a reasonable time any information MDEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to MDEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to MDEQ along with a claim of confidentiality. [11 Miss. Admin.Code Pt. 2, R. 2.2.B(15)(d).]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Genesis Rail Services LLC, Natchez Terminal

Facility Requirements

Permit Number:0040-00054

Activity ID No.: PER20140001

Page 6 of 13

AI0000000154 (continued):

Narrative Requirements:

Condition No.	Condition
T-17	<p>General Condition: This permit does not authorize a modification as defined in 11 Miss. Admin. Code Pt. 2, Ch. 2 "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment". Modification is defined as "Any physical change in or change in the method of operation of a facility which increases actual emissions or potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:</p> <ul style="list-style-type: none">(a) routine maintenance, repair, and replacement;(b) use of an alternative fuel or raw material by reason of an order under Sections 2(a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;(c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;(d) use of an alternative fuel or raw material by a stationary source which: (i) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or (ii) the source is approved to use under any permit issued under 40 CFR 52.51 or under regulations approved pursuant to 40 CFR 51.166;(e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.51, or under regulations approved pursuant to Subpart I or 40 CFR 51.166; or(f) any change in ownership of the stationary source" [11 Miss. Admin.Code Pt. 2, R. 2.1.D(2).]
T-18	<p>General Condition: It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. [11 Miss. Admin.Code Pt. 2, R.2.2.B(15)(a).]</p>
T-19	<p>General Condition: The permittee shall retain all required records, monitoring data, supported information and reports for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings or other data for continuous monitoring instrumentation, and copies of all reports required by this permit. Copies of such records shall be submitted to MDEQ as required by Applicable Rules and Regulations or this permit upon request. [11 Miss. Admin.Code Pt. 2, R.2.9.]</p>
T-20	<p>General Condition: The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for constructing or operating without a valid permit. [11 Miss. Admin.Code Pt. 2, R.2.2.B(5).]</p>

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Genesis Rail Services LLC, Natchez Terminal

Facility Requirements

Permit Number:0040-00054

Activity ID No.: PER20140001

Page 7 of 13

AI0000000154 (continued):

Narrative Requirements:

Condition No.	Condition
T-21	<p>General Condition: Emergencies</p> <p>(a) Except as otherwise specified herein, an emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.</p> <p>(b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.</p> <p>(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence as follows: (i) an emergency occurred and that the permittee can identify the cause(s) of the emergency; (ii) the permitted facility was at the time being properly operated; (iii) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and (iv) the permittee submitted notice of the emergency to MDEQ within two (2) working days of the time when emission limitations were exceeded due to the emergency which contained a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(d) In any enforcement proceeding, the permittee seeking to establish the occurrence of any emergency has the burden of proof.</p> <p>(e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein [11 Miss. Admin.Code Pt. 2, R.2.2.B(10).]</p>
T-22	<p>General Condition: Upsets</p> <p>(a) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows: (i) an upset occurred and that the permittee can identify the cause(s) of the upset; (ii) the source was at the time being properly operated; (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the upset to the DEQ within five (5) working days of the time the upset began which contained a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.</p> <p>(c) This provision is in addition to any upset provision contained in any applicable requirement. [11 Miss. Admin.Code Pt. 2, R.1.10.]</p>

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Genesis Rail Services LLC, Natchez Terminal

Facility Requirements

Permit Number:0040-00054

Activity ID No.: PER20140001

Page 8 of 13

AI0000000154 (continued):

Narrative Requirements:

Condition No.	Condition
T-23	<p>General Condition: Startups and Shutdowns</p> <p>(a) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows: (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above; (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.</p> <p>(c) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply. [11 Miss. Admin.Code Pt. 2, R.1.10.]</p>
T-24	<p>General Condition: Maintenance</p> <p>(a) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following: (i) the permittee can identify the need for the maintenance; (ii) the source was at the time being properly operated; (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit; (iv) the permittee submitted notice of the maintenance to MDEQ within five (5) working days of the time the maintenance began or such other times as allowed by MDEQ, which contained a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>(b) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.</p> <p>(c) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. [11 Miss. Admin.Code Pt. 2, R.1.10.]</p>
T-25	<p>General Condition: For renewal of this permit the applicant shall make application not less than one-hundred eighty (180) days prior to the expiration date of the permit substantiated with current emissions data, test results or reports or other data as deemed necessary by the Mississippi Environmental Quality Permit Board. [11 Miss. Admin.Code Pt. 2, R.2.8.]</p>

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Genesis Rail Services LLC, Natchez Terminal

Facility Requirements

Permit Number:0040-00054

Activity ID No.: PER20140001

Page 9 of 13

GRPT0000000002 Kb Tank Requirements:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		The permittee is subject to and shall comply with the applicable requirements of 40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels) and Subpart A (General Provisions). [40 CFR 60.110b]
L-2		The permittee shall equip each storage vessel with a fixed roof in combination with an internal floating roof meeting the specifications of 40 CFR 60.112b(a)(1)(i)-(ix). [40 CFR 60.112b(a)(1)]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		The permittee shall perform the monitoring in Conditions M-2 through M-5. [40 CFR 60.113b(a)]
M-2		The permittee shall visually inspect the internal roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage vessel. [40 CFR 60.113b(a)(1)]
M-3		For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Mississippi Department of Environmental Quality (MDEQ) in the inspection report required by §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. [40 CFR 60.113b(a)(2)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Genesis Rail Services LLC, Natchez Terminal

Facility Requirements

Permit Number:0040-00054

Activity ID No.: PER20140001

Page 10 of 13

GRPT0000000002 (continued):

Monitoring Requirements:

Condition No.	Parameter	Condition
M-4		The permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal of the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in §60.113b(a)(2) and §60.113b(a)(3)(ii) and at intervals no greater than 5 years in the case of vessels specified in paragraph §60.113b(a)(3)(i). [40 CFR 60.113b(a)(4)]
M-5		The permittee shall notify the MDEQ in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by §60.113b(a)(1) and §60.113b(a)(4) above to afford the MDEQ the opportunity to have an observer present. If the inspection required by §60.113b(a)(4) is not planned and the permittee could not have known about the inspection 30 days in advance of refilling the tank, the permittee shall notify the MDEQ at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the MDEQ at least 7 days prior to the refilling. [40 CFR 60.113b(a)(5)]

Record-Keeping Requirements:

Condition No.	Condition
R-1	The permittee shall keep records and furnish reports as required in Conditions R-2 through R-5 and shall keep copies of all reports and records required for at least 2 years. [40 CFR 60.115b(a)]
R-2	The permittee shall furnish the MDEQ with a report that describes the control equipment and certifies that the control equipment meets the specifications of §60.112b(a)(1) and §60.113b(a)(1). This report shall be an attachment to the notification required in §60.7(a)(3). [40 CFR 60.115b(a)(1)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Genesis Rail Services LLC, Natchez Terminal

Facility Requirements

Permit Number:0040-00054

Activity ID No.: PER20140001

Page 11 of 13

GRPT0000000002 (continued):

Record-Keeping Requirements:

Condition No.	Condition
R-3	The permittee shall keep a record of each inspection performed as required by §60.113b(a)(1)-(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). [40 CFR 60.115b(a)(2)]
R-4	If any of the conditions described in §60.113b(a)(2) are detected during the annual visual inspection, a report shall be furnished to the MDEQ within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature and date the repair was made. [40 CFR 60.115b(a)(3)]
R-5	After each inspection required by §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in §60.113b(a)(3)(ii), a report shall be furnished to the MDEQ within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of §60.112b(a)(1) or §60.113b(a)(3) and list each repair made. [40 CFR 60.115b(a)(4)]
R-6	The permittee shall keep copies of all the records required in Condition R-7, except for the record required by 40 CFR 60.116b(b) for at least 2 years. The record required by 40 CFR 60.116b(b) will be kept for the life of the source. [40 CFR 60.116b(a)]
R-7	The permittee shall keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. [40 CFR 60.116b(b), 40 CFR 60.116b(c)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Genesis Rail Services LLC, Natchez Terminal

Facility Requirements

Permit Number:0040-00054

Activity ID No.: PER20140001

Page 12 of 13

GRPT0000000003 Fuel Burning Requirements:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		The permittee shall only use natural gas as fuel. [11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)]
L-2		The maximum opacity from any point source or emissions at any time shall not exceed 40% as determined by EPA Test Method 9, 40 CFR 60, Appendix A. [11 Miss. Admin. Code Pt. 2, R. 1.3.B]
L-3		The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations greater than 10 million BTU per hour heat input shall not exceed an emission rate as determined by the relationship $E=0.8808 \cdot I^{-0.1667}$ Where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour. [11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b)]
L-4		The maximum discharge of sulfur oxides from each fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. [11 Miss. Admin. Code Pt. 2, R. 1.4.A(1)]
L-5		For Emission Point AB-001, the permittee shall not operate the boiler more than 1920 hours per year. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(10)]

Record-Keeping Requirements:

Condition No.	Condition
R-1	For Emssion Point AB-001, the permitte shall record and maintain records of hours of operation for each month and each consecutive 12 months. [11 Miss. Admin. Code Pt. 2, R. 2.2.B(11)]

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Genesis Rail Services LLC, Natchez Terminal

Facility Requirements

Permit Number:0040-00054

Activity ID No.: PER20140001

Page 13 of 13

GRPT0000000005 NSPS Dc Requirements:

Record-Keeping Requirements:

Fuel Combusted:

Condition No.	Condition
R-1	Fuel Combusted: The permittee shall maintain records of the amount of natural gas combusted during each calendar month. [40 CFR 60.48c(g)(2)]

Narrative Requirements:

Condition No.	Condition
T-1	The permittee is subject to and shall comply with the applicable requirements of the New Source Performance Standards specified in 40 CFR Part 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) and in 40 CFR Part 60, Subpart A (General Provisions). [40 CFR 60.40c(a)]

GENERAL INFORMATION

Genesis Rail Services LLC, Natchez Terminal
120 L E Barry Road
Natchez, MS
Adams County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
154	TDC, LLC	Historic Site Name	6/14/2007	10/15/2012
MS0047422	International Paper, Natchez Tank Farm	Water - NPDES	4/10/1997	4/7/2002
MS0036251	International Paper, Natchez Tank Farm	Water - NPDES	10/4/1985	9/30/1990
MS0047422	International Paper, Natchez Tank Farm	Water - NPDES	3/22/2002	3/3/2004
154	International Paper, Natchez Tank Farm	Historic Site Name	10/4/1985	3/2/2004
MS0047422	Tessengerlo Davison Chemicals LLC	Water - NPDES	3/3/2004	9/20/2006
MSR000101436	International Paper Port Tank Farm	Hazardous Waste-EPA ID	7/10/2003	3/2/2004
18838	International Paper, Natchez Tank Farm	Official Site Name	10/4/1985	10/4/1985
MS0047422	Tessengerlo Davison Chemicals LLC	Water - NPDES	9/20/2006	6/21/2007
154	Tessengerlo Davison Chemicals, LLC	Historic Site Name	3/2/2004	6/14/2007
MS0047422	TDC LLC	Water - NPDES	6/21/2007	8/31/2011
MSG130343	TDC LLC	GP-Hydrostatic Testing	11/15/2011	1/14/2014
154	Genesis Rail Services, LLC	Official Site Name	6/17/2013	
154	TDC, LLC, Natchez	Historic Site Name	10/16/2012	6/17/2013
2800100054	Genesis Rail Services, LLC	Air-AIRS AFS	7/29/2013	
MSR106431	Genesis Rail Services LLC, Natchez Terminal	GP-Construction	8/8/2013	5/16/2014
004000054	Genesis Rail Services LLC, Natchez Terminal	Air-Synthetic Minor Operating	11/21/2013	10/31/2018
MS0047422	Genesis Rail Services LLC, Natchez Terminal	Water - NPDES	1/14/2014	12/31/2018
MSR000101436	Genesis Rail Services, LLC - Natchez Terminal	Hazardous Waste-EPA ID	3/20/2014	

Basin: Mississippi River Basin - direct dischargers to M

GENERAL INFORMATION

Location Description:Copy of 001