STATE OF MISSISSIPPI
AND FEDERALLY ENFORCEABLE
AIR POLLUTION CONTROL
PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT AT A SYNTHETIC MINOR SOURCE

THIS CERTIFIES THAT

Genesis Rail Services LLC, Natchez Terminal
120 L E Barry Road
Natchez, Mississippi
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. seq., 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

Krystal Rudolph

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: JAN 0 9 2019 **Permit No.: 0040-00054**

Effective Date: As specified herein.

Expires: DEC 3 1 2023

SECTION 1

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)

2. 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.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.4.D.)

3. Any activities not identified in the application are not authorized by this permit.

   (Ref.: Miss. Code Ann. 49-17-29 1.b)

4. 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.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)

5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)

6. 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.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)

7. 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.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)

8. 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.

(Ref.: Miss. Code Ann. 49-17-21)

9. 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.

   (Ref.: Miss. Code Ann. 49-17-39)

10. 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.

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)

11. 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.

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)

12. This permit does not authorize a modification as defined in Regulation 11 Miss. Admin. Code Pt. 2, Ch.2., "Permit Regulations for the Construction and/or Operation of Air Emission Equipment." A modification may require a Permit to Construct and a modification of this permit. Modification is defined as "Any physical change in or change in the method of operation of a facility which increases the actual emissions or the 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:

    (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:

        (1) 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 Part 51, Subpart I, or 40 CFR 51.166; or

(2) The source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 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 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I or 40 CFR 51.166; or

(f) Any change in ownership of the stationary source.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.C(15).)

B. GENERAL OPERATIONAL CONDITIONS

1. 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 or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation, 11 Miss. Admin. Code Pt. 2, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.10.)

2. 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."

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

3. 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.

   (Ref.: Miss. Code Ann. 49-17-29 1.a(i and ii))

4. Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.

   (a) Upsets

      (1) For an upset defined in 11 Miss. Admin. Code Pt. 2, R. 1.2., the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:

         (i) An upset occurred and that the source can identify the cause(s) of the upset;

         (ii) The source was at the time being properly operated;

(iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;

(iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;

(v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.

(2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.

(3) This provision is in addition to any upset provision contained in any applicable requirement.

(4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.

(b) Startups and Shutdowns (as defined by 11 Miss. Admin. Code Pt. 2, R. 1.2.)

(1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.

(2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

(3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

5. Compliance Testing: Regarding compliance testing:

(a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.

(b) Compliance testing will be performed at the expense of the permittee.

(c) Each emission sampling and analysis report shall include but not be limited to the following:

(a) Detailed description of testing procedures;

(b) Sample calculation(s);

(c) Results; and

(d) Comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(3), (4), and (6).)

C. PERMIT RENEWAL / MODIFICATION / TRANSFER / TERMINATION

1. 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. If the applicant submits a timely and complete application pursuant to this paragraph and the Permit Board, through no fault of the applicant, fails to act on the application on or before the expiration date of the existing permit, the applicant shall continue to operate the stationary source under the terms and conditions of the expired permit, which shall remain in effect until final action on the application is taken by the Permit Board. Permit expiration terminates the source's ability to operate unless a timely and complete renewal application has been submitted.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.8.)

2. The permittee shall furnish to the DEQ within a reasonable time any information the DEQ 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 the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

3. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a 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 permit condition.

   (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)

4. 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) Persistent 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 federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.C.)

5. This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)

SECTION 2
EMISSION POINT DESCRIPTION

The permittee is authorized to operate air emissions equipment, as described in the following table.

Emission Point	Description
AB-001	10.5 MMBTU/hr natural gas-fired boiler
AB-002	31.935 MMBTU/hr natural gas-fired boiler
AB-003	31.935 MMBTU/hr natural gas-fired boiler
AF-001	Facility Fugitives
AI-001	Vapor Combustion Unit controlling Petroleum Rail Loading
AI-002	Petroleum Barge Loading South Dock
AI-003	Marine Vapor Combustion Unit controlling Petroleum Barge Loading North Dock
AI-004	Sulfatreat Catalyst System controlling Railcar Steaming
AI-005	Tank Roof Landding Operations
AI-006	Tank Cleaning Operations
AT-001	30,000 barrel (1,260,000 gallon) Internal Floating Roof Petroleum Storage Tank (Facility ID 30020)
AT-002	30,000 barrel (1,260,000 gallon) Internal Floating Roof Petroleum Storage Tank (Facility ID 30021)
AT-003	30,000 barrel (1,260,000 gallon) Internal Floating Roof Petroleum Storage Tank (Facility ID 30022)
AT-004	30,000 barrel (1,260,000 gallon) Internal Floating Roof Petroleum Storage Tank (Facility ID 30031)
AT-005	30,000 barrel (1,260,000 gallon) Internal Floating Roof Petroleum Storage Tank (Facility ID 30032)
AT-006	36,000 barrel (1,512,000 gallon) Internal Floating Roof Petroleum Storage Tank (Facility ID 55010)
AT-007	36,000 barrel (1,512,000 gallon) Internal Floating Roof Petroleum Storage Tank (Facility ID 55011)
AT-008	36,000 barrel (1,512,000 gallon) Vertical Fixed Roof NaOH Storage Tank (Facility ID 55012)
AT-009	100,000 barrel (4,200,000 gallon) Internal Floating Roof Petroleum Storage Tank (Facility ID 100051)

SECTION 3
EMISSION LIMITATIONS AND STANDARDS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limitation/Standard
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.1	Equivalent Opacity	≤ 40%
	11 Miss. Admin. Code Pt. 2. R. 1.4.B(2).	3.2	H_2S	≤ One grain per 100 standard cubic feet
AB-001 AB-002 AB-003	40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) 40 CFR 60.40c(a), Subpart Dc	3.3	SO_2 PM	Applicability
AB-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.4	Hours of Operation	≤ 3,000 hours/year
AB-001 AB-002 AB-003 AI-001 AI-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.5	Fuel	Only combust natural gas
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).	3.6	PM	$E = 0.8808 \times I^{-0.1667}$
AB-001 AB-002 AB-003	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.7	SO_X	≤ 4.8 lbs/MMBTU
AI-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.8	Throughput	≤ 419,750 bbl/year
		3.9	Operation	Operate and maintain during railcar loading
		3.10	Temperature	≥ 400°F
AI-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.11	Reid Vapor Pressure & VOC	≤ 4.6 psi ≤ 13.74 tons/year
AI-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.12	Operation	Operate and maintain during barge loading
		3.13		Controlled by marine vapor combustion
		3.14	Reid Vapor Pressure & VOC	≤ 9.5 psi ≤ 13.74 tons/year
		3.15	Temperature	≥ 1400°F
AI-004	11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).	3.16	Operation	Operate and maintain during railcar steaming
AT-001 AT-002 AT-003 AT-004 AT-005 AT-006 AT-007 AT-009	40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984) 40 CFR 60.110b(a), Subpart Kb	3.17	VOC	Applicability
	40 CFR 60.112b(a), Subpart Kb	3.18	Throughput	Maintain floating roof

3.1 For the entire facility, the permittee shall not cause, allow, or permit the discharge into ambient air any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity. This shall not apply to vision obscuration by uncombined water droplets.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

3.2 For the entire facility, 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 1600ºF 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.B(2).)

3.3 For Emission Points AB-001, AB-002, and AB-003, the permittee is subject to and shall comply with the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60, Subpart Dc) and the General Provisions (40 CFR 60, Subpart A).

(Ref.: 40 CFR 60.40c(a), Subpart Dc)

3.4 For Emission Point AB-001, the permittee shall not operate the boiler more than 3,000 hours per year to heat caustic.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

3.5 For Emission Points AB-001, AB-002, AB-003, AI-001, and AI-003, the permittee shall combust natural gas only.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

3.6 For Emission Points AB-001, AB-002, AB-003, AI-001, and AI-003, the permittee shall not cause, allow, or permit the emission of ash and/or particulate matter from fossil fuel burning installations of greater than 10 million BTU per hour input to exceed an emission rate as determined by the relationship:

$E = 0.8808 \times I^{-0.1667}$

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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(b).)

3.7 For Emission Points AB-001, AB-002, and AB-003, the permittee shall not exceed the maximum discharge of sulfur oxides of 4.8 pounds (measured as sulfur dioxide) per million BTU heat input from fuel burning installations in which the fuel is burned to produce heat or power by indirect heat transfer.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

3.8 For Emission Point AI-001, the permittee shall limit railcar loading of diluent to 419,750 barrels per year on a 12-month rolling total.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

3.9 For Emission Point AI-001, the permittee shall operate and maintain the Vapor Combustion Unit at all times while railcar loading is taking place.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

3.10 For Emission Point AI-001, the permittee shall maintain a minimum temperature of 400^{o}F in the Vapor Combustion Unit during loading.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

3.11 For Emission Point AI-002, the permittee shall limit average petroleum product Reid Vapor Pressure to 4.6 psi and uncontrolled VOC emissions to 13.74 tons per year on a 12-month rolling total.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

3.12 For Emission Point AI-003, the permittee shall operate and maintain the Vapor Combustion Unit at all times while barge loading is taking place.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

3.13 For Emission Point AI-003, the permittee shall control emissions with the marine vapor combustion unit unless the Reid Vapor Pressure is less than 1.5 psia.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

3.14 For Emission Point AI-003, the permittee shall limit average petroleum product Reid Vapor Pressure to 9.5 psi and VOC emissions to 13.74 tons per year on a 12-month rolling total.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

3.15 For Emission Point AI-003, the permittee shall maintain a minimum temperature of 1400^{o}F in the Vapor Combustion Unit during loading, except when combusting gas streams as described in Condition 3.2.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

3.16 For Emission Point AI-004, the permittee shall operate and maintain the Sulfatreat catalyst system when railcar steaming is occurring.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(10).)

3.17 For Emission Points AT-001, AT-002, AT-003, AT-004, AT-005, AT-006, AT-007, and AT-009, the permittee is subject to and shall comply with the Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60, Subpart Kb), and the General Provisions (40 CFR 60, Subpart A).

(Ref.: 40 CFR 60.110b(a), Subpart Kb)

3.18 For Emission Points AT-001, AT-002, AT-003, AT-004, AT-005, AT-006, AT-007, and AT-009, the permittee shall maintain the fixed roof in combination with an internal floating roof in accordance with the specifications below:

(a) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

(b) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:

(1) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

(2) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.

(3) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.

(c) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

(d) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

(e) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

(f) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

(g) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.

(h) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

(i) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

(Ref.: 40 CFR 60.112b(a), Subpart Kb)

SECTION 4
WORK PRACTICES

This section was intentionally left blank since no work practice standards apply to this permit action.

SECTION 5
MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Monitoring/Recordkeeping Requirement
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.9.	5.1	Recordkeeping	Maintain records for a minimum of 5 years.
AB-001 AB-002 AB-003	40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) 40 CFR 60.48c(g)(2), Subpart Dc	5.2	Fuel	Maintain fuel usage records
AB-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.3	Hours of operation	Record and maintain
AI-001	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.4	Throughput	Monitor loading of diluent
		5.5	Temperature	Monitor temperature in the Vapor Combustion Unit
		5.6	Throughput	Recordkeeping
		5.7	VOC	Calculate emissions from diluent loading
		5.8		Record emissions from diluent loading
AI-002 AI-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.9	Reid Vapor Pressure & Throughput	Monitor and record for each petroleum product
		5.10		Record and maintain
		5.11	VOC	Calculate emission from petroleum loading
		5.12		Record emissions from petroleum loading
AI-002	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.13	H_2S	Record concentration
AI-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.14	Temperature	Monitor temperature in the Vapor Combustion Unit
		5.15	H_2S	Record concentration
AI-001 AI-003	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.16	Temperature	Install and maintain thermocouple
AI-004	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	5.17	H_2S	Monitor vent stream
		5.18	VOC	Calculate emissions from railcar steaming
		5.19		Record emissions from railcar steaming
		5.20	H_2S	Record concentration
AT-001 AT-002 AT-003 AT-004 AT-005 AT-006 AT-007 AT-009	40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984) 40 CFR 60.113b(a)(1), Subpart Kb	5.21	VOC	Inspect roof and seal
	40 CFR 60.113(b)(a)(2), Subpart Kb	5.22		Inspections for a liquid-mounted or mechanical shoe seal

	40 CFR 60.113(b)(a)(3), Subpart Kb	5.23		Double-seal system inspection requirements
	40 CFR 60.113b(a)(4), Subpart Kb	5.24		Inspect when vessel is emptied or degassed
	40 CFR 60.113b(a)(5), Subpart Kb	5.25		Notify MDEQ 30 days prior to filling or refilling
	40 CFR 60.115b, Subpart Kb	5.26		Maintain records and reports for at least two years
	40 CFR 60.115b(a)(2), Subpart Kb	5.27		Maintain records of inspections
	40 CFR 60.116b(a), Subpart Kb	5.28		Maintain records and reports required by Condition 5.30
	40 CFR 60.116b(b) and (c), Subpart Kb	5.29		Records of dimensions and capacity

5.1 For the entire facility, the permittee shall retain all required records, monitoring data, supporting 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.9)

5.2 For Emission Point AB-001, AB-002, and AB-003, the permittee shall maintain records of the amount of natural gas combusted during each calendar month.

(Ref.: 40 CFR 60.48c(g)(2), Subpart Dc)

5.3 For Emission Point AB-001, the permittee shall record and maintain records of hours of operation for each month and each consecutive 12-months.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.4 For Emission Point AI-001, the permittee shall monitor the loading throughput of diluent at all times.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.5 For Emission Point AI-001, 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^{o}F while loading is occurring.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.6 For AI-001, 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.7 For Emission Point AI-001, the permittee shall calculate VOC emissions for each calendar month and for each consecutive 12-month period from the diluent loading operations.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.8 For Emission Point AI-001, the permittee shall maintain records of the VOC emissions resulting for the loading of diluent.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.9 For Emission Points AI-002 and AI-003, the permittee shall monitor the loading throughput at all times. The permittee shall also monitor the Reid Vapor Pressure of each petroleum product every six months or when the product changes, whichever comes first. The permittee shall maintain records of the Reid Vapor Pressure in accordance with Condition 5.1.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.10 For Emission Points AI-002 and AI-003, the permittee shall maintain records of the loading throughput of each petroleum product 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).)

5.11 For Emission Points AI-002 and AI-003, the permittee shall calculate VOC emissions for each calendar month and for each rolling 12-month period from the petroleum loading operations.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.12 For Emission Points AI-002 and AI-003, the permittee shall maintain record of the VOC emissions resulting from the loading of petroleum products.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.13 For Emission Point AI-002, the permittee shall keep records of the H_2S concentration in the vent stream as determined by the lab analysis of the petroleum product prior to loading.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.14 For Emission Point AI-003, the permittee shall continuously monitor the temperature in the Vapor Combustion Unit and record the date, time, and duration that is operated at less than 1400ºF while loading is occurring.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.15 For Emission Point AI-003, the permittee shall keep records of the H_2S concentration in the vent stream when the Marine Vapor Combustion Unit is not being used.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.16 For Emission Points AI-001 and AI-003, the permittee shall demonstrate compliance with the temperature limit through continuous monitoring of combustion temperature by installing, calibrating, maintaining, and operating temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every six (6) months; or the chart recorder, data logger, or temperature indicator must be replaced. The permittee must replace the equipment either if the permittee chooses not to perform the calibration or if the equipment cannot be calibrated properly. Each temperature monitoring device must have an accuracy of +/- 1% of the temperature being monitored in degrees Celsius. The

thermocouple or temperature sensor shall be installed in the combustion chamber at the location of the combustion zone.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.17 For Emission Point AI-004, the permittee shall monitor the H_2S in the vent stream at the start and end of steaming and every four (4) hours in between. H_2S breakthrough shall be monitored by a gas detection tube or gas meter and the catalyst shall be replaced when the H_2S concentration in the vent stream reaches four (4) ppm. The permittee shall record the date of each H_2S breakthrough and date catalyst is replaced.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.18 For Emission Point AI-004, the permittee shall calculate VOC emissions for each calendar month and for each rolling 12-month period from the steaming of railcars.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.19 For Emission Point AI-004, the permittee shall keep records of the VOC emissions resulting from the steaming of railcars.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.20 For Emission Point AI-004, the permittee shall keep records of the H_2S concentration in the vent stream when railcar steaming is occurring.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

5.21 For Emission Points AT-001, AT-002, AT-003, AT-004, AT-005, AT-006, AT-007, and AT-009, 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 Volatile Organic Liquids (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.

(Ref.: 40 CFR 60.113b(a)(1), Subpart Kb)

5.22 For Emission Points AT-001, AT-002, AT-003, AT-004, AT-005, AT-006, AT-007, and AT-009, the permittee shall visually inspect the internal floating roof at least once every 12-months after initial fill for vessels equipped with a liquid-mounted or mechanical shoe primary seal. 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 permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this condition 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 40 CFR 60.115b(a)(3), Subpart Kb. 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.

(Ref.: 40 CFR 60.113b(a)(2), Subpart Kb)

5.23 For Emission Points AT-001, AT-002, AT-003, AT-004, AT-005, AT-006, AT-007, and AT-009, the permittee shall inspect vessels equipped with a double-seal system as specified in 40 CFR 60.112b(a)(1)(ii)(B), Subpart Kb, in accordance with the following:

(a) Visually inspect the vessel as specified in Condition 5.24 at least every five years; or

(b) Visually inspect the vessel as specified in Condition 5.22 of this section.

(Ref.: 40 CFR 60.113b(a)(3), Subpart Kb)

5.24 For Emission Points AT-001, AT-002, AT-003, AT-004, AT-005, AT-006, AT-007, and AT-009, 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 or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10% 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 inspections as specified in Condition 5.22 and Condition 5.23(b), Subpart Kb, and at intervals no greater than five years in the case of vessels specified in Condition 5.23(a).

(Ref.: 40 CFR 60.113b(a)(4), Subpart Kb)

5.25 For Emission Points AT-001, AT-002, AT-003, AT-004, AT-005, AT-006, AT-007, and AT-009, 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 Condition 5.21 and 5.24 to afford the MDEQ the opportunity to have an observer present. If the inspection required by Condition 5.24 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 seven 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 set by express mail so that it is received by the MDEQ at least seven days prior to the refilling.

(Ref.: 40 CFR 60.113b(a)(5), Subpart Kb)

5.26 For Emission Points AT-001, AT-002, AT-003, AT-004, AT-005, AT-006, AT-007, and AT-009, the permittee shall keep records and furnish reports as required by Conditions 5.27 and 5.28 and Conditions 6.4 and 6.5 and shall keep copies of all reports and records required for at least two years.

(Ref.: 40 CFR 60.115b, Subpart Kb)

5.27 For Emission Points AT-001, AT-002, AT-003, AT-004, AT-005, AT-006, AT-007, and AT-009, the permittee shall keep a record of each inspection performed as required by Conditions 5.21 through 5.24. 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).

(Ref.: 40 CFR 60.115b(a)(2), Subpart Kb)

5.28 For Emission Points AT-001, AT-002, AT-003, AT-004, AT-005, AT-006, AT-007, and AT-009, the permittee shall keep copies of all records required in 40 CFR 60.116b, except for the record required by Condition 5.29, for at least two years. The record required by Condition 5.29 will be kept for the life of the source.

(Ref.: 40 CFR 60.116b(a), Subpart Kb)

5.29 For Emission Point AT-001, AT-002, AT-003, AT-004, AT-005, AT-006, AT-007, and AT-009, the permittee shall keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel.

(Ref.: 40 CFR 60.116b(b), Subpart Kb)

SECTION 6
REPORTING REQUIREMENTS

Emission Point	Applicable Requirement	Condition Number(s)	Reporting Requirement
Facility Wide	11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).	6.1	Report permit deviations within five (5) working days
		6.2	Submit certified annual monitoring report
		6.3	All documents submitted to MDEQ shall be certified by a Responsible Official
AT-001 AT-002 AT-003 AT-004 AT-005 AT-006 AT-007 AT-009	40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984) 40 CFR 60.115b(a)(3), Subpart Kb	6.4	Furnish DEQ with inspection report if defects are detected
	40 CFR 60.115b(a)(4), Subpart Kb	6.5	

6.1 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

6.2 Except as otherwise specified herein, the permittee shall submit a certified annual synthetic minor monitoring report postmarked no later than 31st of January for the preceding calendar year. This report shall address any required monitoring specified in the permit. All instances of deviations from permit requirements must be clearly identified in the report. Where no monitoring data is required to be reported and/or there are no deviations to report, the report shall contain the appropriate negative declaration.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

6.3 Any document required by this permit to be submitted to the MDEQ shall contain a certification signed by a responsible official stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(11).)

6.4 For Emission Points AT-001, AT-002, AT-003, AT-004, AT-005, AT-006, AT-007, and AT-009, the permittee shall furnish to MDEQ within 30 days of the inspection a report if any of the defects described in Condition 5.22 are detected during the annual visual inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied of the nature and date the repair was made.

(Ref.: 40 CFR 60.115b(a)(3), Subpart Kb)

6.5 For Emission Points AT-001, AT-002, AT-003, AT-004, AT-005, AT-006, AT-007, and AT-009, the permittee shall furnish to MDEQ within 30 days of the inspection required by Condition 5.23 a report if any holes or tears in the seal or seal fabric, defects in the

internal floating roof, or other control equipment defects described in Condition 5.20 are found. The report shall identify the storage vessel and the reason it did not meet specifications of Condition 3.18 or Condition 5.23 and list each repair made.

(Ref.: 40 CFR 60.115b(a)(4), Subpart Kb)