



State of Mississippi



FEDERALLY ENFORCEABLE AIR POLLUTION CONTROL PERMIT

Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

THIS CERTIFIES

**Vicksburg Petroleum Products LLC
2222 Warrenton Road
Vicksburg, MS
Warren 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: **MAR 20 2013**
Expires: **FEB 28 2018**

Permit No. **2780-00108**
Agency Interest # **35305**

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Permit to Operate Air Emissions Equipment at a Synthetic Minor Source

Vicksburg Petroleum Products LLC

Subject Item Inventory

Permit Number:2780-00108

Activity ID No.: PER20120001

Subject Item Inventory:

ID	Designation	Description
EQPT1	AA-001	16 MMBtu/hr Crude Heater
EQPT2	AA-002	4.75 MMBtu/hr Supplemental Heater
EQPT3	AA-003	4.75 MMBtu/hr Supplemental Heater
EQPT4	AA-004	4.4 MMBtu/hr Boiler (a.k.a. Cyclone Furnance)
EQPT5	AA-005	4.4 MMBtu/hr Boiler (a.k.a. Cyclone Furnance)
EQPT6	AA-006	4.4 MMBtu/hr Boiler (a.k.a. Cyclone Furnance)
EQPT26	AB-001	2,400,000-gallon Internal Floating Roof Storage Tank with Maximum Reid Vapor Pressure of 5.6 psia
EQPT10	AB-002	420,000-gallon Internal Floating Roof Storage Tank with Maximum Reid Vapor Pressure of 13.5 psia
EQPT11	AB-003	420,000-gallon Internal Floating Roof Storage Tank with Maximum Reid Vapor Pressure of 13.5 psia
EQPT12	AB-004	1,050,000-gallon External Floating Roof Storage Tank with Maximum Reid Vapor Pressure of 0.1 psia
EQPT13	AB-005	420,000-gallon Vertical Fixed Roof Storage Tank with Maximum Reid Vapor Pressure of 0.1 psia
EQPT14	AB-006	420,000-gallon Internal Floating Roof Storage Tank with Maximum Reid Vapor Pressure of 6.0 psia
EQPT15	AB-007	1,050,000-gallon External Floating Roof Storage Tank with Maximum Reid Vapor Pressure of 0.1 psia
EQPT16	AB-008	1,260,000-gallon Internal Floating Roof Storage Tank with Maximum Reid Vapor Pressure of 6.0 psia
EQPT7	AB-009	4,200,000-gallon Internal Floating Roof Storage Tank with Maximum Reid Vapor Pressure of 5.6 psia
EQPT17	AB-010	420,000-gallon Vertical Fixed Roof Storage Tank with Maximum Reid Vapor Pressure of 0.1 psia
EQPT18	AB-011	840,000-gallon Vertical Fixed Roof Storage Tank with Maximum Reid Vapor Pressure of 0.1 psia
EQPT19	AB-012	2,100,000-gallon Vertical Fixed Roof Storage Tank with Maximum Reid Vapor Pressure of 0.1 psia
EQPT20	AB-101	20,100-gallon Internal Floating Roof Storage Tank with Maximum Reid Vapor Pressure of 6.0 psia
EQPT8	AB-102	20,100-gallon Internal Floating Roof Storage Tank with Maximum Reid Vapor Pressure of 0.1 psia
EQPT9	AB-103	20,100-gallon Internal Floating Roof Storage Tank with Maximum Reid Vapor Pressure of 13.7 psia
EQPT21	AB-104	30,000-gallon Pressurized Butane Mix Storage Tank

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ID	Designation	Description
EQPT22	AB-105	7,900-gallon Vertical Fixed Roof Caustic Storage Tank
EQPT23	AB-106	1,640-gallon Vertical Fixed Roof Diesel Storage Tank with Maximum Reid Vapor Pressure of 0.1 psia
EQPT24	AB-107	6,000-gallon Vertical Fixed Roof Slop Oil Storage Tank with Maximum Reid Vapor Pressure of 5.6 psia
EQPT25	AC-001	Covered Oil-Water Separator
AREA1	AD-001	Barge and Truck Loading with VOC emissions controlled by a flare or equivalent control device
AREA2	AE-001	Process Equipment Leaks
AI35305	35305	Petroleum Refinery

Subject Item Groups:

ID	Description	Components
GRPT1	Tank Requirements	EQPT26 2,400,000-gallon Internal Floating Roof Storage Tank with Maximum Reid Vapor Pressure of 5.6 psia
		EQPT10 420,000-gallon Internal Floating Roof Storage Tank with Maximum Reid Vapor Pressure of 13.5 psia
		EQPT11 420,000-gallon Internal Floating Roof Storage Tank with Maximum Reid Vapor Pressure of 13.5 psia
		EQPT12 1,050,000-gallon External Floating Roof Storage Tank with Maximum Reid Vapor Pressure of 0.1 psia
		EQPT13 420,000-gallon Vertical Fixed Roof Storage Tank with Maximum Reid Vapor Pressure of 0.1 psia
		EQPT14 420,000-gallon Internal Floating Roof Storage Tank with Maximum Reid Vapor Pressure of 6.0 psia
		EQPT15 1,050,000-gallon External Floating Roof Storage Tank with Maximum Reid Vapor Pressure of 0.1 psia
		EQPT16 1,260,000-gallon Internal Floating Roof Storage Tank with Maximum Reid Vapor Pressure of 6.0 psia
		EQPT7 4,200,000-gallon Internal Floating Roof Storage Tank with Maximum Reid Vapor Pressure of 5.6 psia
		EQPT17 420,000-gallon Vertical Fixed Roof Storage Tank with Maximum Reid Vapor Pressure of 0.1 psia
		EQPT18 840,000-gallon Vertical Fixed Roof Storage Tank with Maximum Reid Vapor Pressure of 0.1 psia
		EQPT19 2,100,000-gallon Vertical Fixed Roof Storage Tank with Maximum Reid Vapor Pressure of 0.1 psia
		EQPT20 20,100-gallon Internal Floating Roof Storage Tank with Maximum Reid Vapor Pressure of 6.0 psia
		EQPT8 20,100-gallon Internal Floating Roof Storage Tank with Maximum Reid Vapor Pressure of 0.1 psia
EQPT9 20,100-gallon Internal Floating Roof Storage Tank with Maximum Reid Vapor Pressure of 13.7 psia		

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ID	Description	Components
GRPT1	Tank Requirements	EQPT21 30,000-gallon Pressurized Butane Mix Storage Tank
		EQPT22 7,900-gallon Vertical Fixed Roof Caustic Storage Tank
		EQPT23 1,640-gallon Vertical Fixed Roof Diesel Storage Tank with Maximum Reid Vapor Pressure of 0.1 psia
		EQPT24 6,000-gallon Vertical Fixed Roof Slop Oil Storage Tank with Maximum Reid Vapor Pressure of 5.6 psia
GRPT3	Fuel Burning Limitations	EQPT1 16 MMBtu/hr Crude Heater
		EQPT2 4.75 MMBtu/hr Supplemental Heater
		EQPT3 4.75 MMBtu/hr Supplemental Heater
		EQPT4 4.4 MMBtu/hr Boiler (a.k.a. Cyclone Furnance)
		EQPT5 4.4 MMBtu/hr Boiler (a.k.a. Cyclone Furnance)
		EQPT6 4.4 MMBtu/hr Boiler (a.k.a. Cyclone Furnance)
GRPT4	NSPS Subpart Ja Requirements	EQPT1 16 MMBtu/hr Crude Heater
		EQPT2 4.75 MMBtu/hr Supplemental Heater
		EQPT3 4.75 MMBtu/hr Supplemental Heater
		EQPT4 4.4 MMBtu/hr Boiler (a.k.a. Cyclone Furnance)
		EQPT5 4.4 MMBtu/hr Boiler (a.k.a. Cyclone Furnance)
		EQPT6 4.4 MMBtu/hr Boiler (a.k.a. Cyclone Furnance)

KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

RPNT = Release Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

MAFO = Animal Feeding Operation

TRMT = Treatment

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KEY

TRMT = Treatment

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GRPT000000001 (Tanks) Tank Requirements:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For Emission Points AB-001 through AB-103, AB-106, and AB-107, the permittee shall not store any liquid with a Reid vapor pressure greater than that specified in the tank description. (Ref.: Construction Permit issued October 30, 2007). [Other]
L-2		For Emission Points AB-001, AB-002, AB-003, AB-006, AB-008, AB-009, AB-101, and AB-103, the permittee is subject to and shall comply with the applicable requirements of 40 CFR Part 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels) and Subpart A (General Provisions). [40 CFR 60.110b]
L-3		For Emission Points AB-001, AB-002, AB-003, AB-006, AB-008, AB-009, AB-101, and AB-103, the permittee shall equip each storage vessel (tank) with a fixed roof in combination with an internal floating roof meeting the specifications of §60.112b(a)(1)(i)-(ix). [40 CFR 60.112b(a)(1)]
L-4		Emission Point AB-104 shall be designed to operate in excess of 204.9 kPa (29.7 psia) and without emissions to the atmosphere. [40 CFR 60.112b(d)(2)]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		For Emission Points AB-001, AB-002, AB-003, AB-006, AB-008, AB-009, AB-101, and AB-103, the permittee shall perform the monitoring in Conditions M-2 through M-6. [40 CFR 60.113b(a)]
M-2		Visually inspect the internal floating 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 owner or operator shall repair the items before filling the storage vessel. [40 CFR 60.113b(a)(1)]

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GRPT0000000001 (continued):

Monitoring Requirements:

Condition No.	Parameter	Condition
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)]
M-4		For vessels equipped with a double-seal system as specified in §60.112b(a)(1)(ii)(B): (i) Visually inspect the vessel as specified in §60.113b(a)(4) every 5 years or (ii) visually inspect the vessel as specified in §60.113b(a)(2). [40 CFR 60.113b(a)(3)]
M-5		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 owner or operator 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-6		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 owner or operator could not have known about the inspection 30 days in advance of refilling the tank, the owner or operator 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)]

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GRPT000000001 (continued):

Record-Keeping Requirements:

Condition No.	Condition
R-1	For every storage tank, the permittee shall record the contents of the tank, the Reid vapor pressure of each liquid stored in the tank, and the monthly throughput of each liquid. (Ref.: Construction Permit issued October 30, 2007). [Other]
R-2	For Emission Points AB-001, AB-002, AB-003, AB-006, AB-008, AB-009, AB-101, and AB-103, the permittee shall keep records and furnish reports as required in Conditions R-3 through R-6 and shall keep copies of all reports and records required for at least 2 years. [40 CFR 60.115b(a)]
R-3	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)]
R-4	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-5	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-6	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-7	For Emission Points AB-001, AB-002, AB-003, AB-006, AB-008, AB-009, AB-101, and AB-103, the permittee shall keep copies of all the records required in Conditions R-8 through R-10, except for the record required by 40 CFR 116b(b) for at least 2 years. The record required by 40 CFR 116b(b) will be kept for the life of the source. [40 CFR 60.116b(a)]
R-8	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)]
R-9	The permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. [40 CFR 60.116b(c)]

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GRPT0000000001 (continued):

Record-Keeping Requirements:

Condition No.	Condition
R-10	Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined in §60.116b(e)(1)-(3). [40 CFR 60.116b(e)]

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GRPT0000000003 (Fuel Burning) Fuel Burning Limitations:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Particulate Matter	Particulate Matter: For Emission Points AA-002 through AA-006, the maximum permissible emission of ash and/or particulate matter from each fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. [APC-S-1 3.4(a)1]
L-2	Particulate Matter	Particulate Matter: For Emission Point AA-001, the permittee shall not cause, permit, or allow emissions of ash and/or particulate matter to exceed an emission rate as determined by the relationship, $E=0.8808*I^{(-0.1667)}$, 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. [APC-S-1 3.4(a)2]
L-3	Sulfur Dioxide	Sulfur Dioxide: 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. [APC-S-1 4.1(a)]
L-4		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. [APC-S-1 3.2]
L-5		For Emission Points AA-001 through AA-006, the permittee shall not combust any fuel other than refinery fuel gas, natural gas, or a mixture of both. (Ref. Construction Permit issued October 30, 2007). [Other]

Record-Keeping Requirements:

Condition No.	Condition
R-1	For Emission Points AA-001 through AA-006, the permittee shall record the monthly average heat duty in MMBtu/hr for each heater and boiler. (Ref.: Construction Permit issued October 30, 2007). [Other]

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GRPT0000000004 (Fuel Burning) NSPS Subpart Ja Requirements:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		For Emission Points AA-001 through AA-006, the permittee is subject to and shall comply with the applicable requirements of 40 CFR Part 60, Subpart Ja (Standards of Performance for Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced After May 14, 2007) and Subpart A (General Provisions). The permittee shall comply with the emission limitations of this subpart on or after the date on which the initial performance test, required by §60.8, is completed, but not later than 60 days after achieving the maximum production rate at which the affected facility will be operated, or 180 days after initial startup, whichever comes first. [40 CFR 60.100a, 40 CFR 60.102a(a)]
L-2		The permittee shall not burn in any fuel gas combustion device any fuel gas that contains hydrogen sulfide (H ₂ S) in excess of 162 ppmv determined hourly on a 3-hour rolling average basis and H ₂ S in excess of 60 ppmv determined daily on a 365 successive calendar day rolling average basis. [40 CFR 60.120a(g)(1)ii]
L-3		The permittee shall conduct a root cause analysis and a corrective action analysis for each exceedance of the short term emission limit (i.e., 162 ppmv) if the SO ₂ discharge to the atmosphere is 227 kg (500 lb) greater than the amount that would have been emitted if the emission limits had been met during one or more consecutive periods of excess emissions or any 24-hour period, whichever is shorter. [40 CFR 60.103a(c)(2)]
L-4		A root cause analysis and corrective action analysis must be completed as soon as possible, but no later than 45 days after a discharge meeting the condition in §60.103a(c)(2). Except as provided in §60.103a(f) and (g), the permittee shall implement the corrective action(s) identified in the correction action analysis in accordance with the applicable requirements of paragraphs §60.103a(e)(1) through (3). [40 CFR 60.103a(d), 40 CFR 60.103a(e)]

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GRPT0000000004 (continued):

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		For Emission Points AA-001 through AA-006, the permittee shall install, operate, calibrate, and maintain an instrument for continuously monitoring and recording the concentration by volume (dry basis) of H ₂ S in the fuel gases before being burned in any fuel gas combustion device. The permittee shall install, operate, and maintain each H ₂ S monitor in accordance with §60.107a(a)(2)(i)-(iii). Fuel gas combustion devices having a common source of fuel gas may be monitored at only one location, if monitoring at this location accurately represents the concentration of H ₂ S in the fuel gas being burned. [40 CFR 60.107a(a)(2)]
M-2		For Emission Points AA-001 through AA-006, the permittee is not required to comply with Condition L-2 above if the fuel gas streams combusted are inherently low in sulfur content. Fuel gas streams that are considered inherently low in sulfur content include the following: (a) Pilot gas for heaters and flares; (b) Fuel gas streams that meet a commercial-grade product specification for sulfur content of 30 ppmv or less; (c) Fuel gas streams produced in process units that are intolerant to sulfur contamination; and (d) Other fuel gas streams that the permittee demonstrates are low-sulfur according to the procedures in §60.107a(b). [40 CFR 60.107a(3)]
M-3		Using EPA Test Method 16 in 40 CFR Part 60, Appendix A, the permittee shall determine the total reduced sulfur (TRS) content of the refinery fuel gas in ppmv on a semiannual basis for the purposes of determining actual emissions of sulfur dioxide. Semiannual monitoring of TRS in the refinery fuel gas shall only be required for two (2) years after commencing operation or until four (4) fuel gas samples have been analyzed for TRS, at a minimum. (Ref.: Construction Permit issued October 30, 2007). [Other]

Record-Keeping Requirements:

Condition No.	Condition
R-1	The permittee shall comply with the notification, recordkeeping, and reporting requirements in §60.7. [40 CFR 60.108a(a)]

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GRPT0000000004 (continued):

Record-Keeping Requirements:

Condition No.	Condition
R-2	The permittee shall maintain records of discharges greater than 500 lb of SO ₂ in any 24-hour period from any affected fuel gas combustion device. The records shall include the relevant information in §60.108a(c)(6)(i)-(xi). [40 CFR 60.108a(c)(6)]
R-3	The permittee shall submit an excess emissions report for all periods of excess emissions according to the requirements of §60.7(c) except that the report shall contain the information specified in §60.108a(d)(1)-(7). [40 CFR 60.108a(d)]

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EQPT0000000025 (AC-001) Covered Oil-Water Separator:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		Emissions from the Oil-Water Separator shall be controlled by covering the separator. (Ref.: Construction Permit issued October 30, 2007). [Other]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		The permittee shall determine the maximum flow rate of wastewater to the Oil-Water Separator. (Ref.: Construction Permit issued October 30, 2007). [Other]
M-2		The permittee shall continuously monitor the wastewater flow to the Oil-Water Separator unless the permittee chooses to assume the maximum flow rate, as determined in Condition M-1, for purposes of determining emissions from this source. (Ref.: Construction Permit issued October 30, 2007). [Other]

Record-Keeping Requirements:

Condition No.	Condition
R-1	The permittee shall maintain records of the maximum flow rate to the Oil-Water Separator. (Ref.: Construction Permit issued October 30, 2007). [Other]
R-2	If the permittee chooses to continuously monitor the wastewater flow to the Oil-Water Separator, the permittee shall record the total monthly flow to the Oil-Water Separator. (Ref.: Construction Permit issued October 30, 2007). [Other]

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AREA0000000001 (AD-001) Barge and Truck Loading with VOC emissions controlled by a flare or equivalent control device:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		The permittee shall collect vapor emissions from all barge and truck loading and route the vapors to a flare or other control device with a design control efficiency of 99% or greater. The control device shall be operated at all times when emissions may be vented to it. (Ref.: Construction Permit issued October 30, 2007). [Other]
L-2		If the permittee controls emissions using a flare, the flare shall be designed for and operated with no visible emissions and shall be operated with a flame present at all times. (Ref.: Construction Permit issued October 30, 2007). [Other]

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		If the permittee uses a flare to control emissions, the permittee shall conduct daily visual observations for visible emissions from the flare for a period of six (6) minutes. These observations shall take place in conjunction with barge or truck loading. If any visible emissions are observed, the permittee shall immediately determine the cause of the visible emissions and take the appropriate action to correct or prevent further visible emissions. (Ref.: Construction Permit issued October 30, 2007). [Other]
M-2		If the permittee uses a control device other than a flare to control emissions from barge and truck loading, the permittee shall develop and submit a plan to the MDEQ for establishing parametric monitoring (e.g., minimum operating temperature) for the control device within 90 days of commencing operation of barge or truck loading. The plan shall be submitted as a request to modify the operating permit to incorporate the parametric monitoring. (Ref.: Construction Permit issued October 30, 2007). [Other]

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AREA0000000001 (continued):

Record-Keeping Requirements:

Condition No.	Condition
R-1	The permittee shall maintain records of the type and amount of product loaded each month by barge and truck. (Ref.: Construction Permit issued October 30, 2007). [Other]
R-2	If the permittee uses a flare to control emissions, the permittee shall keep a daily log of the visible emissions observations, including the date and time the observation was conducted, whether or not visible emissions were observed, and any corrective and/or preventive action taken. (Ref.: Construction Permit issued October 30, 2007). [Other]
R-3	The permittee shall submit a semiannual report in accordance with Part VII.G summarizing any visible emissions observed during the semiannual period and the corrective and/or preventive actions taken. (Ref.: Construction Permit issued October 30, 2007). [Other]

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AREA0000000002 (AE-001) Process Equipment Leaks:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		Any equipment, including compressors, valves, pumps, pressure relief devices, sampling connection systems, open-ended valves or lines, and other connectors in VOC service, associated and constructed with the pre-flash tower is subject to and shall comply with the applicable requirements of 40 CFR Part 60, Subpart GGGa (Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006) and Subpart A (General Provisions). [40 CFR 60.590a]
L-2		The permittee shall comply with the requirements of §§60.482-1a to 60.482-10a as soon as practicable, but no later than 180 days after initial startup. [40 CFR 60.592a(a)]
L-3		The permittee may elect to comply with the requirements of §§60.592a(b)(1), (2), or (3) as an alternative to the requirements in §60.482-7a. [40 CFR 60.592a(b)]
L-4		The permittee shall comply with the provisions of §60.485a, except as provided in §60.593a. [40 CFR 60.592a(d)]
L-5		Facility-wide, the permittee shall maintain a leak percentage of 1.0 percent or less determined quarterly. This standard applies to all process equipment in VOC service, including compressors, valves, pumps, pressure relief devices, sampling connection systems, open-ended valves or lines, process drains, and other connectors. VOC service means that the piece of equipment contains or contacts a process fluid that is at least 10 percent VOC by weight. A leak is defined as an instrument reading of 10,000 ppm or greater or any indication of liquids dripping from a seal. (Ref.: Construction Permit issued October 30, 2007). [Other]

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AREA0000000002 (continued):

Monitoring Requirements:

Condition No.	Parameter	Condition
M-1		For the entire facility, the permittee shall monitor each compressor seal, pump seal, valve, pressure relief device, sampling connection, flange, process drain, and any other connector in VOC service on a quarterly basis, except those that are inaccessible or unsafe to monitor (i.e., personnel would be exposed to an immediate danger). Leaks of VOC shall be determined using EPA Reference Method 21 found in 40 CFR Part 60, Appendix A. (Ref.: Construction Permit issued October 30, 2007). [Other]
M-2		For the entire facility, the permittee shall visually monitor each component in light liquid or heavy liquid service for liquids dripping, that is, visible leakage from the seal. This visual monitoring shall be performed quarterly in conjunction with the monitoring required in Condition M-1. (Ref.: Construction Permit issued October 30, 2007). [Other]
M-3		When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 days after the leak is detected. The permittee shall make a first attempt at repair no later than five (5) days after the leak is detected. (Ref.: Construction Permit issued October 30, 2007). [Other]

Record-Keeping Requirements:

Condition No.	Condition
R-1	For all equipment identified in L-1 as being subject to NSPS GGGa, the permittee shall comply with the provisions of §§60.486a and 60.487a. [40 CFR 60.592a(e)]
R-2	For the entire facility, the permittee shall identify and maintain records of each compressor seal, pump seal, valve, pressure relief device, sampling connection, flange, process drain, and any other connector in VOC service. The records shall indicate the type of VOC service, gas/vapor, light liquid, or heavy liquid, as defined in §60.481a. (Ref.: Construction Permit issued October 30, 2007). [Other]

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AREA0000000002 (continued):

Record-Keeping Requirements:

Condition No.	Condition
R-3	<p>The permittee shall maintain a log of the quarterly leak detection inspections required by Conditions M-1 and M-2, including the following information:</p> <ul style="list-style-type: none">(a)Date(s) of the quarterly inspection.(b)Identification of all leaking components.(c)Date the first attempt at repair was made for each leaking component.(d)Repair methods applied to each leaking component.(e)Date the leak was successfully repaired.(f)Percentage of leaking components. <p>(Ref.: Construction Permit issued October 30, 2007). [Other]</p>

Submittal/Action Requirements:

Condition No.	Condition
S-1	<p>The permittee shall submit annual reports summarizing the results of the quarterly leak detection inspections and the percentage of leaking equipment. (Ref.: Construction Permit issued October 30, 2007). [Other]</p>

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AI0000035305 (35305) Petroleum Refinery:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	Opacity	Opacity: 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. [APC-S-1 3.2]
L-2	Opacity	Opacity: The permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b). (a)Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period. (b)Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour. [APC-S-1 3.1]
L-3		The permittee shall limit volatile organic compound (VOC) emissions to no more than 99.0 tons/year (TPY) as determined for each consecutive 12-month period. (Ref.: Construction Permit issued October 30, 2007). [Other]
L-4		The permittee shall limit hazardous air pollutant (HAP) emissions to no more than 9.5 tons/year (TPY) of any single HAP and no more than 24.5 TPY of combined HAPs as determined for each consecutive 12-month period. (Ref.: Construction Permit issued October 30, 2007). [Other]
L-5		The permittee is subject to and shall comply with applicable requirements of 40 CFR Part 61, Subpart FF (National Emission Standard for Benzene Waste Operations) and 40 CFR Part 61, Subpart A (General Provisions). (Ref.: §61.340(a)) (a)The following waste is exempt from the requirements of this subpart: (i)Waste in the form of gases or vapors that is emitted from process fluid and (ii) Waste that is contained in a segregated stormwater sewer system. (Ref.: §61.340(c)) (b)Any gaseous stream from a waste management unit, treatment process, or wastewater treatment system routed to a fuel gas system, as defined in §61.341, is exempt from this subpart. No testing, monitoring, recordkeeping, or reporting is required under this subpart for any gaseous stream from a waste management unit, treatment process, or wastewater treatment system routed to a fuel gas system. (Ref.: §61.340(d)). [40 CFR 61.340]

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AI0000035305 (continued):

Limitation Requirements:

Condition No.	Parameter	Condition
L-6		<p>If the total annual benzene quantity from the facility waste is less than 10 megagramss per year (Mg/yr) (11 ton/yr), the facility shall be exempt from the requirements of §61.342(b) and (c). The total annual benzene quantity from facility waste is the sum of the annual benzene quantity for each waste stream at the facility that has a flow-weighted annual average water content greater than 10 percent or that is mixed with water, or other wastes, at any time and the mixture has an annual average water content greater than 10 percent. The benzene quantity in a waste stream is to be counted only once without multiple counting if other waste streams are mixed with or generated from the original waste stream. Other specific requirements for calculating the total annual benzene waste quantity are as follows:</p> <p>(a)Wastes that are exempted from control under §§61.342(c)(2) and 61.342(c)(3) are included in the calculation of the total annual benzene quantity if they have an annual average water content greater than 10 percent, or if they are mixed with water or other wastes at any time and the mixture has an annual average water content greater than 10 percent.</p> <p>(b)The benzene in a material subject to this subpart that is sold is included in the calculation of the total annual benzene quantity if the material has an annual average water content greater than 10 percent.</p> <p>(c)Benzene in the wastes generated by remediation activities conducted at the facility, such as the excavation of contaminated soil, pumping and treatment of groundwater, and the recovery of product from soil or groundwater, are not included in the calculation of total annual benzene quantity for that facility.</p> <p>(d)The total annual benzene quantity is determined based upon the quantity of benzene in the waste before any waste treatment occurs to remove the benzene except as specified in §61.355(c)(1)(i)(A) through (C). [40 CFR 61.342(a)]</p>
L-7		<p>If the total annual benzene quantity from facility waste is less than 1 Mg/yr (1.1 ton/yr), then the owner or operator shall submit to the MDEQ a report that updates the information listed in paragraphs §§61.357(a)(1) through (a)(3) of this section whenever there is a change in the process generating the waste stream that could cause the total annual benzene quantity from facility waste to increase to 1 Mg/yr (1.1 ton/yr) or more. [40 CFR 61.357(b)]</p>
L-8		<p>If the total annual benzene quantity from facility waste is less than 10 Mg/yr (11 ton/yr) but is equal to or greater than 1 Mg/yr (1.1 ton/yr), then the owner or operator shall submit to the MDEQ a report that updates the information listed in paragraphs §§61.357(a)(1) through (a)(3) of this section. The report shall be submitted annually and whenever there is a change in the process generating the waste stream that could cause the total annual benzene quantity from facility waste to increase to 10 Mg/yr (11 ton/yr) or more. If the information in the annual report required by paragraphs §§61.357(a)(1) through (a)(3) of this section is not changed in the following year, the owner or operator may submit a statement to that effect. [40 CFR 61.357(c)]</p>

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AI0000035305 (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. [APC-S-2 II.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. [APC-S-2 II.B(11)]

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. [APC-S-2 V.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)]
T-4	General Condition: Any diversion from or bypass of collection and control facilities is prohibited except as provided for in Regulation APC-S-1, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. [APC-S-1 Section 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. [APC-S-2 X]

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AI0000035305 (continued):

Narrative Requirements:

Condition No.	Condition
T-6	<p>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:</p> <p>(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</p> <p>(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]</p>
T-7	<p>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:</p> <p>(a) Violation of any terms or conditions of this permit</p> <p>(b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or</p> <p>(c) A change in any condition that required either a temporary or permanent reduction or elimination of authorized air emissions. [APC-S-2 II.C]</p>
T-8	<p>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. [APC-S-2 II.B(15)b]</p>
T-9	<p>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]</p>
T-10	<p>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. [APC-S-2 II.B(15)c]</p>
T-11	<p>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. [APC-S-2 II.B(7)]</p>

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AI0000035305 (continued):

Narrative Requirements:

Condition No.	Condition
T-12	General Condition: This permit may only be transferred upon approval of the Mississippi Environmental Quality Permit Board. [APC-S-2 XVI.B]
T-13	General Condition: This permit is for air pollution control purposes only. [APC-S-2 I.D(1)]
T-14	General Condition: This permit is a Federally-approved permit to operate a synthetic minor source as described in Regulation APC-S-2, Section IV.D. [APC-S-2 IV.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. [APC-S-2 I.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. [APC-S-2 II.B(15)d]

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AI0000035305 (continued):

Narrative Requirements:

Condition No.	Condition
T-17	<p>General Condition: This permit does not authorize a modification as defined in APC-S-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" [APC-S-2 I.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. [APC-S-2 II.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. [APC-S-2 IX]</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. [APC-S-2 II.B(5)]</p>

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AI0000035305 (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 [APC-S-2 II.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. [APC-S-1 Section 10]</p>

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AI0000035305 (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. [APC-S-1 Section 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. [APC-S-1 Section 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. [APC-S-2 VIII]</p>

GENERAL INFORMATION

Vicksburg Petroleum Products LLC
2222 Warrenton Road
Vicksburg, MS
Warren County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
35305	Vicksburg Petroleum Products, LLC	Official Site Name	5/10/2007	
35305	Independence, LLC	Historic Site Name	2/23/2007	5/10/2007
278000108	Vicksburg Petroleum Products, LLC	Air-Construction	10/30/2007	
278000108	Vicksburg Petroleum Products, LLC	Air-Synthetic Minor Operating	10/30/2007	9/30/2012
2814900108	Vicksburg Petroleum Products LLC	Air-AIRS AFS	10/30/2007	
MS0060976	Vicksburg Petroleum Products LLC	Water - NPDES	2/19/2008	1/31/2013
278000108	Vicksburg Petroleum Products LLC	Air-Synthetic Minor Operating	3/20/2013	2/28/2018

Basin: Mississippi River Basin - direct dischargers to M

Location Description: