

Iowa Department of Natural Resources

Draft Title V Operating Permit Fact Sheet

This document has been prepared to fulfill the public participation requirements of 40 CFR Part 70 and 567 Iowa Administrative Code (IAC) 22.107(6). 40 CFR Part 70 contains operating permit regulations pursuant to Title V of the Clean Air Act.

The Iowa Department of Natural Resources (DNR) finds that:

1. Magellan Pipe Line Company, LLC- Des Moines Terminal, located at 2503 S.E. 43rd Street, Des Moines, Iowa 50327 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Ms. Melanie Little, Vice-President Operations.
2. Magellan Pipe Line Company, LLC- Des Moines Terminal is a Gasoline Terminal/ Pipe Line Breakout Station, (SIC 4613). This facility consists of 66 significant emission units with potential emissions of:
- 3.

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	0.40
Particulate Matter	PM	0.40
Sulfur Dioxide	SO ₂	0
Nitrogen Oxides	NO _x	22.38
Volatile Organic Compounds	VOC	420.0
Carbon Monoxide	CO	50.49
Lead	Lead	0
Hazardous Air Pollutants ⁽¹⁾	HAP	24.4
Greenhouse Gases (mass basis)	GHG	8,833.32
Greenhouse Gases (CO ₂ e basis)	GHG	8,841.27

(1) May include the following: Benzene; Ethyl Benzene; Hexane; Toluene; 2,2,4-Trimethylpentane; and Xylene (mixed isomers).

4. Magellan Pipe Line Company, LLC- Des Moines Terminal submitted a Title V Operating Permit renewal application on December 21, 2009 and any additional information describing the facility on December 8, 2010, February 28, 2011, April 3, 2013, and April 26, 2013. Based on the information provided in these documents, DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 22.107.
5. DNR has complied with the procedures set forth in 567 IAC 22.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.

DNR procedures for reaching a final decision on the draft permit:

The public comment period for the draft permit will run from May 20, 2013 through June 18, 2013. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period. During this time, anyone may submit written comments on the permit. Mail signed comments to Jeff Gabby at the Polk County address shown below.

1. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Jeff Gabby at the Polk County address shown below.
2. DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the renewal application. The responsiveness summary and the final permit will be available to the public upon request.

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DNR concludes that:

1. DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 20-35, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. DNR has the authority to issue operating permits for air contaminant sources and to include conditions in such permits under 455B.134 Code of Iowa.
3. The emission limits included in this permit are authorized by 455B.133 Code of Iowa and 567 IAC Chapters 20-35.
4. DNR is required to comply with 567 IAC Chapter 22 in conjunction with issuing a Title V Operating Permit.
5. The issuance of this permit does not preclude the DNR from pursuing enforcement action for any violation.

Applicant: Magellan Pipe Line Company, LLC-/Des Moines Terminal
EIQ Number: 92-6788
Facility File Number: 77-01-114

Review Engineer:
Jeff Gabby

Application Evaluation

A. Project Briefing:

This permit application is for 98-TV-019R2, a Part 70 Title V permit to operate for (51) significant petroleum product storage tanks, (1) Gasoline/ Distillate Loading Rack, Submerged Normal, with Zeeco Vapor Combustion Unit, (1) 6.46 MM BTU/ Hr Natural Gas Fired Heater/ Fractionator, (1) Railcar Loading Rack, (1) MPE Groundwater Soil Remediation System, (1) Groundwater/ Soil Remediation System, (1) MPE Groundwater Soil Remediation System, (1) Air Lift Trench Remediation System, with Catalytic Oxidizer, (1) Transmix Distillation Unit (fractionator) (EU 72), Butane Unloading/Loading and Blending Operations including: (2) 55,000 gallon storage tanks (2) 65,000 gallon storage tanks and (2) butane-truck loading positions, (1) Ethanol Rail Loading Rack, Tank Roof Landings, (1) Control Room Sub-Slab Remediation Vent, (1) Truck Rack Sub-Slab Remediation Vent, (1) 5,000 barrel (210,000 gallon) Biodiesel Storage Tank, Biodiesel Offloading System, and (2) 21,000 gallon Portable Frac Tanks. Conditions transfer into the Title V Operating Permit from the following Polk County Construction Permits: 1250 Modified #4, 2363 Modified #2, 0627, 1229 Modified, 1233 Modified #2, 0717 Modified #3, 1486 Modified, 2111 Modified #2, 2142, 2190, 2191, 2349, and 2255 Modified. These construction permits cover all of the significant emission units at the facility.

Fugitive Emissions (Valves, Pumps, and Flanges) (EU 48); (17) Bulk Additive Storage Tanks (EU 49 (1-17)); (1) Oil and Water Separator System (sumps and water tanks) (EU 50); (1) 1.75 MM BTU/ Hr Natural Gas Fired Boiler (EU 52); (1) LPG Flare (EU 54); Unloading Skids (EU 57); Pressure Vessels (EU 58); (1) Remediation Recovery Tank (EU 66); Q-grade Filter Drainage (EU 67); (1) #2 Fuel Oil Storage Tank # 1140-5.5 MM Gallon Capacity, Vertical Fixed Roof (EU 69); and (1) Tank #902: Mainline Relief Tank, Spheroid Pressure (EU 75) are insignificant, per 567 IAC 22.102- 103.

The Title V Renewal application received 12/21/2009 claimed the following additional EUs as insignificant: (EU 2 – 22, 24 – 32, 38 – 42, and 44 – 46). These are not insignificant, because they have applicable requirements in their Polk County Construction Permit # 2363 Modified #2. (EU 51) Natural Gas Fired Heater (Fractionator), 6.46 MM BTU/Hr was applied for as insignificant, but it has applicable requirements in Polk County Construction Permit #0627. (EU 56) Railcar Loading Rack was applied for as insignificant, but it has applicable requirements in Polk County Construction Permit # 1229 Modified. (EU 73) Butane Unloading/Loading and Blending Operations including: (2) 55,000 gallon storage tanks (2) 65,000 gallon storage tanks and (2) butane-truck loading positions was applied for as insignificant, but it has applicable requirements in Polk County Construction Permit #2111 Modified #2. (EU 78) Truck Rack Sub-Slab Remediation Vent was applied for as insignificant, but it has applicable requirements in Polk County Construction Permit #2191. All of these are listed in the Title V permit as significant EUs.

Transmix Distillation Unit (fractionator) (EU 72 / EP 72) was applied for by the facility as insignificant in the Title V Renewal Application, but it is being permitted as significant. It has a Polk County AQD construction permit, (Polk County AQD #2001), which has emission limits for opacity, VOC, and HAPs. The emission limits are federally enforceable applicable requirements, and therefore EU 72 must be classified as significant.

B. Applicable rules and regulations:

1. Emission limits and conditions: Applicable requirements are found in the following Polk County AQD Construction Permits. Requirements have been transferred into the Title V Operating Permit.

- Polk County AQD # 1250 Modified #4 - Gasoline/ Distillate Loading Rack, Submerged Normal, with Zeeco Vapor Combustion Unit (EU 1 / EP 1).
- Polk County AQD # 2363 Modified #2 - (51) significant petroleum product storage tanks and Tank Roof Landings (EU / EP 2-46, 58a, 62-64, 76, 79-80).
- Polk County AQD # 0627 - (1) 6.46 MM BTU/ Hr Natural Gas Fired Heater/ Fractionator (EU 51 / EP 51).
- Polk County AQD # 1229 Modified - (1) Railcar Loading Rack (EU 56 / EP 56).
- Polk County AQD # 1233 Modified #2 - (1) Air Lift Trench Remediation System, with Catalytic Oxidizer (EU 65 / CE 65 / EP 65).
- Polk County AQD # 0717 Modified #3 - Groundwater Soil Remediation System (EU 53 / EP 53).
- Polk County AQD # 1486 Modified – MPE Groundwater Soil Remediation System (EU 59 / EP 59).
- Polk County AQD #2001 - Transmix Distillation Unit (fractionator) (EU 72 / EP 72).
- Polk County AQD # 2111 Modified #2 - Butane Unloading/Loading and Blending Operations including: (2) 55,000 gallon storage tanks (2) 65,000 gallon storage tanks and (2) butane-truck loading positions (EU 73 / EP 73).
- Polk County AQD # 2142 - Ethanol Rail Loading Rack (EU 74 / EP 74).
- Polk County AQD # 2190 - Control Room Sub-Slab Remediation Vent (EU 77 / EP 77).
- Polk County AQD # 2191 - Truck Rack Sub-Slab Remediation Vent (EU 78 / EP 78).
- Polk County AQD # 2349 - Biodiesel System composed of: 5,000 barrel (210,000 gallon) Biodiesel Storage Tank (EU BDT1 / EP BD1) and Biodiesel Offloading System (EU BDOL / EP BD2).
- Polk County AQD # 2255 Modified - (2) 21,000 gallon Portable Frac Tanks (EU PFT / EP PFT).

2. Opacity for the facility: Less than 20% opacity- Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9. Polk County Construction Permit 1250 Modified #4 limits opacity for the loading rack with VCU (EU 1 / CE 1 / EP 1) to no visible emissions for more than 5 minutes in any two-hour period, per §60.18 (c)(1). The following EUs are limited to no visible emissions by their respective AQD construction permits:

- Polk County AQD # 1229 Modified - (1) Railcar Loading Rack (EU 56 / EP 56).
- Polk County AQD # 1486 Modified – MPE Groundwater Soil Remediation System (EU 59 / EP 59).
- Polk County AQD #2001 - Transmix Distillation Unit (fractionator) (EU 72 / EP 72).
- Polk County AQD # 2111 Modified #2 - Butane Unloading/Loading and Blending Operations including: (2) 55,000 gallon storage tanks (2) 65,000 gallon storage tanks and (2) butane-truck loading positions (EU 73 / EP 73).
- Polk County AQD # 2142 - Ethanol Rail Loading Rack (EU 74 / EP 74).

3. NSPS: Subpart K is applicable to EU/EP's 45 and 46 because of the construction dates. Applicable requirements have been placed in the Title V permit for these tanks. Subpart Kb is applicable to EU/EPs 62, 63, 64, and 80. Subpart K and Kb requirements are found in Polk County Construction Permit #2363 Modified #2 and these requirements have been transferred into the Title V permit. NSPS Subpart XX is applicable to the loading rack with VCU (EU 1 / CE 1 / EP 1). Its requirements are found in Polk County Construction Permit 1250 Modified #4 and these requirements have been transferred into the Title V permit.

4. NESHAP: 40 CFR Part 63, Subpart BBBB-B-National Emission Standards for Hazardous Air Pollutants for Area Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities- the facility is subject to this NESHAP. Applicable requirements were placed in Polk County AQD Const. Permits #1250 Modified #4 and #2363 Modified #2, and have been transferred into the Title V Permit.

40 CFR Part 63, Subpart R-National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals (for major source facilities within the gasoline distribution source category) was placed in the previous Title V permits, as a PTE limiting mechanism, even though the source was not subject to the subpart. With the applicability of NESHAP Subpart BBBB and its requirements in this Title V permit, the Subpart R references are no longer necessary and have been removed.

5. PSD: Source is major (PSD) for VOC (420 TPY) and will need to submit a PSD permit application when a qualifying change is made, i.e., applying for a significant increase of any PSD regulated pollutant.

6. NAAQS: Facility is located in an attainment area. Air modeling is not required at this time.

7. Title IV: Not applicable.

8. Stratospheric ozone: the only ozone depleting chemicals (regulated by 40 CFR 82) at the terminal are those used for air conditioning. 40 CFR 82, Subpart F, applies to the disposal of appliances containing Class I or Class II substances (i.e. air conditioners).

9. PM-10: The facility's Vapor Combustion Unit (VCU), EU/ EP/ CE 1, combusts Natural Gas and fugitive petroleum product vapors from terminal loading operations and the new remediation system. DNR's Rule: 567 IAC 23.3 (2) a. limits PTE of PM to 0.1 gr/dscf. In TPY, this equals:

$$(0.1 \text{ gr/dscf})(2,140 \text{ scf/min})(60 \text{ min/hr})(1 \text{ lb./7,000 gr}) = 1.83 \text{ lb/hr} = 8.03 \text{ TPY}$$

This is achievable using AP-42 § 1.4, which yields a maximum expected 4.9 lb/ yr, pre-control.

EU/EP 51 is a Fractionator, which distills and separates fuel oil from gasoline.

DNR's Rule: 567 IAC 23.3 (2) a. limits PTE of PM to 0.1 gr/dscf. In TPY, this equals:

$$\begin{aligned} V_{\text{Exhaust}} &= V_{\text{Fuel}} + V_{\text{Air}} \\ &= (6.46 \text{ mmBTU/hr})(1 \text{ scf/1,000 BTU}) + (1,238 \text{ scf/min})(60 \text{ min/hr}) \\ &= 80,740 \text{ scf/hr} \end{aligned}$$

$$(0.1 \text{ gr/dscf})(80,740 \text{ scf/hr})(1 \text{ lb./7,000 gr}) = 1.15 \text{ lb/hr} = 5.05 \text{ TPY}$$

This is achievable using AP-42 § 1.4, which yields a maximum expected 0.34 TPY.

C. Monitoring consideration:

EP1/ EU1/ CE1' s Potential To Emit indicates that it is uncontrolled Major for VOCs, as well as controlled Major (138.482 TPY). EU 1 has an allowable concentration limit of 35 mg VOC/ lt of gasoline loaded. Two (2) stack tests (per Title V permit life span) and an Agency O&M Plan are indicated for VOC. A CAM Plan is also indicated. Two (2) USEPA Method 25A or 25B VOC stack tests (during the permit term) and compliance with NESHAP Subpart BBBBBB and NSPS Subpart XX fulfill all monitoring requirements and therefore an Agency O&M Plan and CAM Plan will not be required for EU 1.

EU1 is uncontrolled major for HAPs, but controlled minor (7.524 TPY). Under DNR's Monitoring Guidance Policy, an Facility O&M Plan and one (1) stack test (per Title V permit life span) are indicated for HAPs (Benzene, Hexane, Toluene, 2,2,4- Trimethylpentane, and Xylenes,). EU1 has no short term limit for HAPs in Polk County Construction Permit 1250 Modified #4. This makes the stack testing requirement non-applicable for HAPs. Monitoring will be accomplished through compliance with NESHAP Subpart BBBBBB and NSPS Subpart XX. The Facility O&M and CAM Plan will not be required, since compliance with NESHAP BBBBBB and NSPS Subpart XX will ensure monitoring compliance with the HAP emission limit. EU1 is uncontrolled minor for NOx and CO, which indicates no monitoring requirements under DNR's Monitoring Guidance Policy.

(51) significant petroleum product storage tanks and Tank Roof Landings (EU / EP 2-46, 58a, 62-64, 76, 79-80) is permitted by Polk County AQD # 2363 Modified #2, which contains 40 CFR Part 63, Subpart BBBBBB-National Emission Standards for Hazardous Air Pollutants for Area Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities applicable requirements. Subpart BBBBBB contains sufficient monitoring such that additional monitoring and CAM will not be required, except that it doesn't contain sufficient monitoring to ensure compliance with the plant wide emission limits of 420.0 TPY VOC, 9.4 TPY single HAP, and 24.4 combined HAP. The following monitoring requirements are added in order to accomplish this:

†: If the monthly total facility VOC and HAP actual emission calculations equals 75% or greater of the facility VOC and HAP emission limits, (315 TPY VOC; 7.05 TPY single HAP; and 18.3 TPY combined HAP), the following weekly calculations and record keeping schedule will apply. If three (3) subsequent weekly facility actual emission calculations results in emissions less than 75% of the facility VOC and HAP emission limits, the facility may revert back to the monthly calculations and record keeping schedule.

* Throughput records shall be kept on weekly basis for each individual tank. Records shall include the weekly total and 52 weeks rolling total. Records shall be kept on site for 5 years and be made available to representatives of Polk County AQD upon request.

* The facility shall calculate and record weekly the total facility actual VOC and HAP emissions and the rolling 52 weeks of each. HAP records shall be per individual HAP and for all HAPs combined. These records shall be kept on site for 5 years and be made available to representatives of Polk County AQD upon request.

Transmix Fractionator (EU 51 / EP 51) is a natural gas fired unit which has uncontrolled minor PTEs for all pollutants. No additional monitoring is warranted.

Railcar Loading Rack (EU 56 / EP 56) is uncontrolled minor for VOC (2.089 TPY) and HAPs (0.109 TPY). Compliance with emission limits is accomplished by staying under the throughput limit on a 12 month period, rolled monthly. No VEs are allowed, but none would be expected from a VOC only source. No additional monitoring is warranted.

MPE Groundwater Soil Remediation System (EU 59) is uncontrolled minor (4.93 TPY) for VOCs. Compliance with emission limits is accomplished through monthly effluent sampling of EP 59. No additional monitoring is warranted.

Air Lift Trench Remediation System, with Catalytic Oxidizer (EU 65 / CE 65 / EP 65) is controlled minor (10.1 TPY VOC) and uncontrolled major (202.0 TPY VOC). A Facility O&M Plan and 1 VOC test are indicated by DNR's Monitoring Guidance. A CAM Plan is also indicated, and this will be required in lieu of the Facility O&M Plan. The monthly remediation vent gas sampling and analyzing required by Polk County Construction Permit #1233 Modified #2 is more stringent than the one (1) VOC test indicated by DNR's Monitoring Policy and hence a separate one time VOC test will not be required.

(EU 53 / EP 53) Groundwater/ Soil Remediation System, is uncontrolled minor (12.0 TPY) for VOCs. Compliance with emission limits is accomplished through monthly effluent sampling of EP 53, when the system is operated, which is rare. No additional monitoring is warranted.

Transmix Distillation Unit (fractionator) (EU 72 / EP 72) in uncontrolled minor for VOC (3.65 TPY) and HAPs (0.19 TPY). No VEs are allowed, but none would be expected from a VOC only source. No additional monitoring is warranted.

Butane Unloading/Loading and Blending Operations including: (2) 55,000 gallon storage tanks (2) 65,000 gallon storage tanks and (2) butane-truck loading positions (EU 73 / EP 73) is uncontrolled minor (1.56 TPY VOC). No VEs are allowed, but none would be expected from a VOC only source. No additional monitoring is warranted.

Ethanol Rail Loading Rack (EU 74 / EP 74) is uncontrolled minor (14.582 TPY VOC) and (0.214 TPY HAP). No VEs are allowed, but none would be expected from a VOC only source. No additional monitoring is warranted.

Control Room Sub-Slab Remediation Vent (EU 77 / EP 77) is a personnel safety vent in the control room, which was installed after VOC fumes were discovered. It is uncontrolled and rated at 36.258 lbs./ day Total HydroCarbons (THC). It has an uncontrolled PTE of 6.73 TPY VOC and 0.14 TPY combined HAPs. No additional monitoring is warranted.

Truck Rack Sub-Slab Remediation Vent (EU 78 / EP 78) is a personnel safety vent, which was installed after VOC fumes were discovered. It is uncontrolled and rated at 5.899 lbs./ day Total HydroCarbons (THC). It has an uncontrolled PTE of 1.08 TPY VOC and 0.03 TPY combined HAPs. No additional monitoring is warranted.

5,000 barrel (210,000 gallon) Biodiesel Storage Tank and Biodiesel Offloading System (EU BDT1 / EP BD1) and (EU BDOL / EP BD2) are uncontrolled minor at 1.39 TPY VOC and 0.32 TPY VOC, respectively. No additional monitoring is warranted.

(2) 21,000 gallon Portable Frac Tanks (EU PFT / EP PFT) are uncontrolled minor at 1.42 TPY VOC. No additional monitoring is warranted.

Changes made to the Title V Permit for 98-TV-019-M003 (7/2001):

- Responsible Official, Permit Contact Person for the Facility, and Supervisor of Air Operating Permits Section were changed to the current personnel.
- Abbreviations section was updated to the current template.
- All references to MTBE were removed from the permit, since the facility no longer buys, sells, or blends this product.
- Plantwide Conditions were modified to the current standard template, including plantwide Compliance Plan being added.

- Polk County Construction Permit 1250 replaced Polk County Construction Permit 0587 Modified, and the appropriate limits and conditions were changed. These permits covered the Gasoline/ Distillate Loading Rack, Submerged Normal, with Vapor Combustion Unit (EU 1 / CE 1 / EP 1) and Groundwater Remediation System (EU 59 / CE 1 / EP 1) with Zeeco Vapor Combustor (CE 1).
- The rated capacity of EU 1 was changed to 144,000 gallons/ hour, based on a bottle neck calculation which takes into account truck loading capability of 3 trucks/ spot/ hour.
- The applicant requested that the process throughput limit for EU 1 be removed from the Title V permit. This was not granted, since Polk County Construction Permit 1250 contains a limit of 1,184,176,800 gallons per 12 month period, rolled monthly for EU 1. This throughput limit was updated in the Title V permit from what the limit had been in Polk County Construction Permits 0587 Modified, 1182, 1183, and 1184.
- Polk County Construction Permit 1250 changed the input from remediation vapor going into CE 1 to an allowable 2,814 tons per 12 month period rolled monthly. This was updated in the 98-TV-019-M003 permit. The construction permit also updated the VCU vapor destruction efficiency to 98.6% from stack test results, and this was updated in the 98-TV-019-M003 permit.
- The applicant wanted to use monthly emission calculation averages in checking compliance with the remediation system emission limits obtained from required monthly sampling for (EU59 / CE 1 / EP 1). This request is denied, since it would change, and possibly lessen, federally enforceable conditions from Polk County Construction Permit 1250. This change must first be made through modification request to the construction permit.
- (EU 4 / EP 4) PTE and emission limit were changed as a result of no longer storing MTBE in the tank.
- The applicant wanted to use monthly emission calculation averages in checking compliance with the remediation system emission limits obtained from required monthly sampling for (EU53 / EP 53). This request is denied, since it would change, and possibly lessen, federally enforceable conditions from Polk County Construction Permit 0717 Modified. This change must first be made through modification request to the construction permit.
- The following additions were made in a previous Title V modification:
 - o Tank 1150: 100,000 Barrel Gasoline (RVP 13) storage tank, with internal floating roof (EU 62 / EP 62): Polk County Construction Permit 1182
 - o Tank 1151: 100,000 Barrel Gasoline (RVP 13) storage tank, with internal floating roof (EU 63 / EP 63): Polk County Construction Permit 1183
 - o Tank 1152: 100,000 Barrel Gasoline (RVP 13) storage tank, with internal floating roof (EU 64 / EP 64): Polk County Construction Permit 1184
- Rail car rack, fuel oil loading and unloading, with thirteen (13) loading arms, (EU 56 / EP 56), was added to the significant EU's in the 98-TV-019-M003 permit as a result of Polk County Construction Permit 1229 being issued for a modification at the facility. EU 56 was previously listed in the insignificant part of the permit. No periodic monitoring is required by DNR Periodic Monitoring guidelines, since the EP is controlled minor, 0.962 TPY, and uncontrolled minor 0.962 TPY VOC.
- Fractionator Heater #2, (EU 61 / EP 61), was in the Title V permit, as a result of Polk County Construction Permit 1181 being issued. The equipment was never installed and the facility requested that it be removed from the 98-TV-019-M003 permit. Polk County Construction Permit 1181 will be voided out and the EU is removed from the modified Title V permit.
- Groundwater/ Soil Remediation Equipment (Air Lift Trench) with Catalytic Oxidizer (EU 65 / CE 65 / EP 65) was added to the permit as a result of Polk County AQD Construction Permit 1233 MODIFIED being issued. The applicant wanted to use monthly emission calculation averages in checking compliance with the remediation system emission limits obtained from required monthly sampling for (EU 65 / CE 65 / EP 65). This request is denied, since it would change, and possibly lessen, federally enforceable conditions from Polk County Construction Permit 1233 MODIFIED. This change must first be made through modification request to the construction permit. No periodic monitoring is required by DNR Periodic Monitoring guidelines, since the EP is controlled minor, 0.151 TPY, and uncontrolled minor 15.1 TPY VOC.

- Tank #419, (EU 2 / EP 2), a 252,000 gallon external floating roof gasoline tank was originally grandfathered. In June of 2001, Polk County Construction Permit 1326 was issued, which allowed a geodesic dome to be added onto the tank. This lowered its federally enforceable PTE to 1.9065 TPY VOC, (12-month rolling). Conditions from the construction permit were transferred into the Title V permit. Under DNR Periodic Monitoring guidelines, nothing is required.
- Tank #420, (EU 3 / EP 3), a 252,000 gallon external floating roof gasoline tank was originally grandfathered. In June of 2001, Polk County Construction Permit 1325 was issued, which allowed a geodesic dome to be added onto the tank. This lowered its federally enforceable PTE to 1.9065 TPY VOC, (12-month rolling). Conditions from the construction permit were transferred into the Title V permit. Under DNR Periodic Monitoring guidelines, nothing is required.

Changes made to the Title V Permit for 98-TV-019-M004 (1/30/02):

- The change was a minor permit modification. It involves adding two (2) insignificant emission units:
 - a) Bulk Additive Storage Tank- 2000 Gallon Capacity, Fuel Oil Additive No. 3 (EU 49-15) and
 - b) Bulk Additive Storage Tank- 1000 Gallon Capacity, UNISOL Liquid Red BK-50 (EU 49-16).
- The Title V permit was also modified to reflect changes in conditions from issuance of Polk County Construction Permit 1250 MODIFIED. This permit allowed changing of the remediation methodology, and associated permit conditions. No changes were made in PTE of the permitted equipment. This permit affected the Gasoline/ distillate Loading Rack, Submerged Normal, with Zeeco Vapor Combustion Unit (EU 1 / CE 1 / EP 1) and the Groundwater/ Soil Remediation System (EU 59 / CE 1 / EP 1).

Changes made to the Title V Permit for 98-TV-M005 (2/5/08):

- The change is a minor permit modification. It involves adding on insignificant emission unit:
 - a) Transmix Distillation Unit (fractionator) (EU 72/EP72).

This unit was permitted under Polk County Construction Permit Number 2001.

The unit has been permitted for the following emission limits:

- a) VOC 3.65 TPY
- b) HAP (total) 0.19 TPY
- c) Hexane 0.06 TPY
- d) Opacity None Allowed

There are no Operating Limits, reporting or record keeping requirements associated with this unit.

The permitted emission limits are below the DNR *De minimus emission limits* (5 TPY of a regulated pollutant, 1,000 pounds per year of a single HAP, 2,500 pounds per year of all HAPs combined and 100 lbs per year of any high-risk pollutants and 250 lbs per year of all high-risk pollutants combined) and therefore qualifies as a minor permit modification.

Changes made to the Title V Permit for 98-TV-019R2:

- Polk County AQD Const. Permit #2363 Modified #2 voided PC Const. Permit # 2363 Modified on 10/22/2012.
- PC Const. Permit # 2363 Modified voided PC Const. Permit #: 1182, 1183, 1184, 1824, 1325, 1326, 2255, 2339, and 2363 on 9/17/2012.
- Polk County AQD Const. Permit #2111 Modified voided PC Const. Permit # 2111 on 5/11/2009.

- Polk County AQD Const. Permit #2111 Modified #2 voided PC Const. Permit # 2111 Modified on 3/30/2011.
- Polk County AQD Const. Permit #1485 Modified voided PC Const. Permit # 1485 on 9/18/2012.
- Polk County AQD Const. Permit #1485 Modified #2 voided PC Const. Permit # 1485 Modified on 10/22/2012.
- Polk County AQD Const. Permit #0587 Modified voided PC Const. Permit # 0587 on 6/12/1998.
- Polk County AQD Const. Permit #1250 voided PC Const. Permit # 0587 Modified on 6/6/2000.
- Polk County AQD Const. Permit #1250 Modified voided PC Const. Permit # 1250 on 12/27/2001.
- Polk County AQD Const. Permit #1250 Modified #2 voided PC Const. Permit # 1250 Modified on 2/27/2002.
- Polk County AQD Const. Permit #1250 Modified #3 voided PC Const. Permit # 1250 Modified #2 on 10/22/2002.
- Polk County AQD Const. Permit #1250 Modified #4 voided PC Const. Permit # 1250 Modified #3 on 8/4/2009.
- Polk County AQD Const. Permit #1229 Modified voided PC Const. Permit # 1229 on 10/9/2008.
- Polk County AQD Const. Permit #0717 Modified voided PC Const. Permit # 0717 on 8/29/1996.
- Polk County AQD Const. Permit #0717 Modified #2 voided PC Const. Permit # 0717 Modified on 10/10/2002.
- Polk County AQD Const. Permit #2255 Modified voided PC Const. Permit # 2255 on 8/1/2012.
- Solar Saturn Natural Gas Turbine Engine, 11.55 MM BTU/Hr., Natural Gas (EU 47 / EP 47) has been permanently removed from the facility.
- Polk County AQD Const. Permit #1486 Modified voided PC Const. Permit # 1486 on 4/4/2013.
- Polk County AQD Const. Permit #1485 Modified #2 (EU 68 / CE 68 / EP 68) was voided by a letter dated 4/29/2013. The remediation system was closed/ removed.
- Polk County AQD Const. Permit #0717 Modified #3 voided PC Const. Permit # 0717 Modified #2 on 4/29/2013.

D. Green House Gases:

Green House Gases: DNR's Table 2 of Estimation of Greenhouse Gas Emissions, revised 1/9/2012, AP-42, and GHG calculation spreadsheet were used in determining GHG PTE. GHG PTEs are as follows:

- (EU 1 /CE 1 / EP 1): 5229.11 TPY GHG (mass); 5233.65 TPY CO₂e
- (EU 51 /EP 51): 3307.45 TPY GHG (mass); 3310.62 TPY CO₂e
- (EU 59 / EP 59): has no GHG PTE. It is a remediation system which does not involve combustion, and therefore has VOC only emissions.
- (EU 65 /CE 65 / EP 65): 296.75 TPY GHG (mass); 297.00 TPY CO₂e
- (EU 53 / EP 53): has no GHG PTE. It is a remediation system which does not involve combustion, and therefore has VOC only emissions.
- (EU 72 / EP 72): has no GHG PTE. It is a vent discharging un-combusted vapors from the Transmix Distillation Unit (EU 72), which are VOC only emissions.

The facility wide GHG (mass) PTE is 8833.32 TPY (uncontrolled minor) and CO₂e PTE is 8841.27 TPY (uncontrolled minor).

E. Responsible Official:

Ms. Melanie Little, Vice-President Operations, is in charge of a principle business function, that of producing and selling petroleum fuel products, as well as making a profit for Magellan Pipeline Company, L.L.C.- Des Moines Terminal. She meets the definition of a Responsible Official found in 567 IAC 22.100.