Iowa
Fields of Opportunities

STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

September 11, 2012

Attn: Jason Schinstock
Farmers Cooperative Association
201 Mills Street
P.O. Box 70
Libertyville, IA 52567

RE: Air Quality Compliance Evaluation - Small Bulk Gasoline Plant
DNR Plant No: 89-06-004
DNR Permit No: 10-A-575 (Small Bulk Gasoline Plant, 13794 Route W30, Stockport, IA 52651)

Dear Mr. Schinstock:

On **September 6, 2012**, I was at the **Farmers Cooperative Association** Small Bulk Gasoline Plant indicated above to conduct an air quality compliance evaluation of the plant. The purpose of this evaluation was to determine the current compliance status of the **Farmers Cooperative Association** facility with respect to the rules and regulations governing air pollution in the state of Iowa.

During the inspection, it was identified that the facility is not performing and documenting the required monthly leak inspections. In addition, there appeared to be a slight leak around the fitting on the center (clear diesel) pump below the loading rack.

Based on the results of the inspection, the facility will need to initiate and complete the following items by the suspense date shown on the bottom of this letter.

1. Begin performing and documenting monthly leak inspections.
2. Investigate and repair leak on the fitting on the clear diesel pump.

Please note that according to the permit for the bulk gasoline plant, repair or replacement of leaking equipment must be completed within 15 days of detection of the leak. Excess emissions reports must be submitted for leaks not repaired within 15 days.

The completed Bulk Gasoline Plant inspection form is included with this letter.

If you have any questions or would like further explanation of any part of this letter, please contact me at 319-653-2135.

Sincerely,

FIELD SERVICES & COMPLIANCE BUREAU

Jon Ryk
Environmental Specialist

Encl: Completed Air Quality Inspection Form - Small Bulk Gasoline Plant - Farmers Cooperative Association, Stockport, IA

JPR: J:\Fo6\SHARED\JRYK\AQ\2012\Farmers Cooperative Association - Stockport\Farmers Cooperative Assoc - Stockport SBGP- Cover Ltr.doc

xc: Attn: Doug Deardorf, Farmers Cooperative Association, 201 Mills Street, P.O. Box 70, Libertyville, IA 52567
IDNR AQ Bureau, 7900 Hickman Road, Suite 1, Windsor Heights, IA 50324
AQ File - Bulk Gasoline Plant, Van Buren County, Farmers Cooperative Association, Stockport, IA

Suspense: October 15, 2012

Environmental Services Division, Field Office #6, 1023 W. Madison, Washington, Iowa 52353-1623 Tel 319-653-2135 Fax 319-653-2856

AIR QUALITY INSPECTION

Small Bulk Gasoline Plant
(Gasoline Throughput less than 20,000 Gallons per Month)
SPECIFIC CONDITIONS - Page 1
Inspector Initials JPN

FACILITY NAME: **Farmers Cooperative Association - Stockport**
FACILITY NUMBER: **89-06-004**
INSPECTION DATE: **September 6, 2012**

This permit is only applicable to equipment located at a bulk gasoline plant(1) that is located at an area source of Hazardous Air Pollutants (HAP)(2). The owner or operator is allowed to add, remove and modify emissions units, or change throughput or operations, at this source without modifying this permit as long as the source continues to meet the emission limits and the operating limits in condition 9 and condition 13 of this permit and maintains a list of all loading arms and storage tanks operated at the facility as specified in condition 14. If any proposed change at this source would cause an exceedance of any emission limit or operating limit in this permit, the owner or operator must first obtain the proper air quality construction permits.

Tank ID	Material Stored	Tank capacity, gallons	Date of installation	Loading Method[4]
9	☐ Gasoline[5] ☒ Fuel Oil[6] (Clear Ruby) ☐ Other liquid:	10,500	Sept. 1994	☐ Top load, splash fill ☐ Submerged fill[8] (i.e. drop tube) to within 12" of bottom ☒ Submerged fill[8] to within 6" of bottom
10	☐ Gasoline[5] ☒ Fuel Oil[6] (Dyed #2) ☐ Other liquid:	12,000	Sept. 1994	☐ Top load, splash fill ☐ Submerged fill[8] to within 12" of bottom ☒ Submerged fill[8] to within 6" of bottom
11	☐ Gasoline[5] ☒ Fuel Oil[6] (Dyed #2) ☐ Other liquid:	12,000	Sept. 1994	☐ Top load, splash fill ☐ Submerged fill[8] to within 12" of bottom ☒ Submerged fill[8] to within 6" of bottom
12	☐ Gasoline[5] ☒ Fuel Oil[6] (Dyed) ☐ Other liquid:	12,000	Sept. 1994	☐ Top load, splash fill ☐ Submerged fill[8] to within 12" of bottom ☒ Submerged fill[8] to within 6" of bottom
13	☒ Gasoline[5] (Gasohol) ☐ Fuel Oil[6] ☐ Other liquid:	12,000	Sept. 1994	☐ Top load, splash fill ☐ Submerged fill[8] to within 12" of bottom ☒ Submerged fill[8] to within 6" of bottom
14	☒ Gasoline[5] (Unleaded) ☐ Fuel Oil[6] ☐ Other liquid:	12,000	Sept. 1994	☐ Top load, splash fill ☐ Submerged fill[8] to within 12" of bottom ☒ Submerged fill[8] to within 6" of bottom
	☐ Gasoline[5] ☐ Fuel Oil[6] ☐ Other liquid:			☐ Top load, splash fill ☐ Submerged fill[8] to within 12" of bottom ☐ Submerged fill[8] to within 6" of bottom
	☐ Gasoline[5] ☐ Fuel Oil[6] ☐ Other liquid:			☐ Top load, splash fill ☐ Submerged fill[8] to within 12" of bottom ☐ Submerged fill[8] to within 6" of bottom
	☐ Gasoline[5] ☐ Fuel Oil[6] ☐ Other liquid:			☐ Top load, splash fill ☐ Submerged fill[8] to within 12" of bottom ☐ Submerged fill[8] to within 6" of bottom
	☐ Gasoline[5] ☐ Fuel Oil[6] ☐ Other liquid:			☐ Top load, splash fill ☐ Submerged fill[8] to within 12" of bottom ☐ Submerged fill[8] to within 6" of bottom

---

(1) A bulk gasoline plant is any gasoline storage and distribution facility that receives gasoline by pipeline, ship or barge, or cargo tank and has a gasoline throughput of less than 20,000 gallons per day. Gasoline throughput shall be the maximum calculated design throughput as may be limited by compliance with an enforceable condition under Federal, State, or local law and discoverable by the Administrator and any other person.

(2) An area source of HAP is a stationary source that has the potential to emit of less than 10 tons per year of any individual HAP and less than 25 tons per year of total HAP.

(3) Required for gasoline only.

(4) **Bottom filling is considered to be a type of submerged filling.**

(5) Includes all blends of gasoline (e.g. E10, E85, gasohol).

(6) Includes fuel oil grades No. 1 through No.6, kerosene, and diesel fuels.

(7) For arms loading gasoline, submerged fill pipes installed before November 9, 2006 must be no more than 12 inches from the bottom of the tank. Submerged fill pipes installed after November 9, 2006 must be no more than 6 inches from the bottom of the tank.

(8) For tanks storing gasoline, submerged fill pipes installed before November 9, 2006 must be no more than 12 inches from the bottom of the tank. Submerged fill pipes installed after November 9, 2006 must be no more than 6 inches from the bottom of the tank.

AIR QUALITY INSPECTION
Small Bulk Gasoline Plant
(Gasoline Throughput less than 20,000 Gallons per Month)
SPECIFIC CONDITIONS - Page 2

Inspector Initials ____

Arm ID	Date of construction	Rated Pump Capacity gpm	Ave monthly throughput (gal)[3]	Materials Loaded (check all that apply)	Loading Method[4] (check one)
#1	Sept. 1994	100	4,657	☒ Gasoline[5] ☐ Fuel Oil[6] ☐ Other liquid:	☐ Top load, splash fill ☐ Submerged fill[7] (i.e. drop tube) to within 12" of bottom ☒ Submerged fill[7] to within 6" of bottom By AJS on 12/14 per conversation on 12/14
#2	Sept. 1994	100	1,756	☐ Gasoline[5] ☒ Fuel Oil[6] (Clear) ☐ Other liquid:	☒ Top load, splash fill ☐ Submerged fill[7] to within 12" of bottom ☐ Submerged fill[7] to within 6" of bottom
#3	Sept. 1994	100	23,170	☐ Gasoline[5] ☒ Fuel Oil[6] (Dyed) ☐ Other liquid:	☒ Top load, splash fill ☐ Submerged fill[7] to within 12" of bottom ☐ Submerged fill[7] to within 6" of bottom
				☐ Gasoline[5] ☐ Fuel Oil[6] ☐ Other liquid:	☐ Top load, splash fill ☐ Submerged fill[7] to within 12" of bottom ☐ Submerged fill[7] to within 6" of bottom
				☐ Gasoline[5] ☐ Fuel Oil[6] ☐ Other liquid:	☐ Top load, splash fill ☐ Submerged fill[7] to within 12" of bottom ☐ Submerged fill[7] to within 6" of bottom

Notes:

1. A slight leak was observed on the center (clear diesel) pump below the loading rack. There was a wet appearance at the fitting and a definite diesel odor.

AIR QUALITY INSPECTION
Small Bulk Gasoline Plant
(Gasoline Throughput less than 20,000 Gallons per Month)
SPECIFIC CONDITIONS - Page 3
Inspector Initials JPR

2.

Bulk Gasoline Plant **Permit: 10-A-575** **Operating** **Opacity: N/A**	**In Compliance**	**Out of Compliance (Comments)**	**Not Applicable or Unable to Evaluate**
9. Emission Limits			
Pollutant: Volatile Organic Compounds Emission Limit(s): 7.0 tons/yr[3] Authority for Requirement: IDNR Construction Permit # **10-A-575**	☐	☐	☒ (unable to evaluate)
Pollutant: Single HAP Emission Limit(s): See note 4 Authority for Requirement: IDNR Construction Permit # **10-A-575**	☐	☐	☒ (unable to evaluate)
Pollutant: Total HAP Emission Limit(s): See note 4 Authority for Requirement: IDNR Construction Permit # **10-A-575**	☐	☐	☒ (unable to evaluate)
[3] Limit for all loading racks and storage tanks. Limit established to limit facility's PTE. [4] Based on the EPA document, Gasoline Distribution Industry (Stage I) – Background Information for Proposed Standards (January, 1994), total HAP concentration of gasoline vapor is 11.0% by weight and the highest concentration of a single HAP is hexane at 4.4% by weight.			
Comments: No comments with respect to emission limits.			
12. NSPS and NESHAP Applicability			
There are no New Source Performance Standards (NSPS) for this source type at this time. Storage tanks at bulk gasoline plants are exempt from 40 CFR Part 60, Subpart Kb, (Standards of Performance for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction or Modification Commenced after July 23, 1984) in accordance with § 60.110b(d)(5).	☐	☐	☒
This bulk gasoline plant is subject to the requirements of 40 CFR Part 63, Subpart BBBBBB, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities (567 IAC 23.1(4)"eb"). The emission sources to which the subpart applies are the gasoline storage tanks, gasoline loading racks, vapor collection-equipped gasoline cargo tanks and equipment components in vapor or liquid gasoline service. If this plant started up on or before November 9, 2006, it is considered an existing affected source and it must comply with the requirements of this subpart by no later than January 10, 2011. If this plant started up between November 9, 2006 and January 10, 2008, it is considered a new affected source and it must comply with the requirements of this subpart by no later than January 10, 2008. New facilities that start up after January 10, 2008 must comply with the requirements of this subpart upon startup.	☒	☐	☐
Comments: Facility appears to be an existing affected source.			
13. Operating Limits			
Operating limits for this emission unit shall be:			
A. The gasoline throughput at this facility shall not exceed 19,999 gallons per calendar month. This shall be the amount of all gasoline and	☒	☐	☐

Bulk Gasoline Plant **Permit: 10-A-575** **Operating** **Opacity: N/A**	**In Compliance**	**Out of Compliance (Comments)**	**Not Applicable or Unable to Evaluate**
gasoline blends loaded into cargo tanks.			
B. By the compliance date specified in Section 12 of this permit and §63.11083, the owner or operator must comply with the following requirement: each gasoline storage tank with a capacity of 250 gallons or greater and each <u>gasoline cargo tank</u>[1] shall be loaded by means of submerged filling[2]. Submerged fill pipes installed on or before November 9, 2006 must be no more than 12 inches from the bottom of the tank. Submerged fill pipes installed after November 9, 2006 must be no more than 6 inches from the bottom of the tank. Any new gasoline storage tank or loading rack installed after the issuance date of this permit shall also comply with this requirement. Bottom filling of storage tanks and gasoline cargo tanks is included in the definition of submerged filling.	☒	☐	☐
C. By the compliance date specified in Section 12 of this permit and §63.11083, the owner or operator shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:			
i. Minimize gasoline spills;	☒	☐	☐
ii. Clean up spills as expeditiously as practicable;	☒	☐	☐
iii. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; and	☒	☐	☐
iv. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.	☒	☐	☐
[1] <u>gasoline cargo tank</u> means a delivery tank truck or railcar which is loading gasoline or which has loaded gasoline on the immediately previous load.			
[2] This requirement does not preclude the owner or operator from having to comply with other local, state or federal regulations concerning the storage and distribution of gasoline.			
Comments: Evidence suggesting a slight leak was observed at fitting on the clear diesel pump below the loading rack.			
14. Operating Condition Monitoring			
With the exception of the records required to be kept by Section 14 C. of this permit, all records as required by this permit shall be kept on-site for a minimum of two (2) years and shall be available for inspection by the Department. Records required to be kept by Section 14 C. shall be maintained for a minimum of five (5) years with the most recent two (2) years kept on site. Records shall be legible and maintained in an orderly manner. The permittee may maintain records off-site provided that the records are available within 24 hours or one business day of a request by an authorized representative of a federal, state, or local air pollution regulatory agency. These records shall show the following:			

AIR QUALITY INSPECTION
Small Bulk Gasoline Plant
(Gasoline Throughput less than 20,000 Gallons per Month)
SPECIFIC CONDITIONS - Page 5
Inspector Initials ____

Bulk Gasoline Plant **Permit: 10-A-575** **Operating** **Opacity: N/A**	**In Compliance**	**Out of Compliance (Comments)**	**Not Applicable or Unable to Evaluate**
A. At a minimum, the owner or operator shall maintain a record of the quantity of all gasoline and gasoline blends loaded into cargo tanks each calendar month.	☒	☐	☐
B. The owner or operator shall maintain an up to date list of the loading arms and storage tanks located at this facility. This information shall include the identification and description, the capacity, the installation date, and associated control equipment. For gasoline storage tanks and loading arms for gasoline, information must be maintain on the type of loading method (i.e. submerged fill within 12 inches of the tank bottom or submerged fill within 6 inches of the tank bottom).	☒ (list is in the permit which the owner has a copy of)	☐	☐
C. Beginning with the compliance date specified in Section 12 of this permit and §63.11083, the owner or operator must perform a monthly leak inspection of all equipment in gasoline service(1). Equipment in gasoline service includes, but is not limited to, pumps, valves, open-ended lines, and connectors. For this inspection, detection methods incorporating sight, sound and smell are acceptable. The following information must be retained:			
i. The types, identification numbers and locations of all equipment in gasoline service. For facilities electing to implement an instrument program for leak monitoring, the record shall contain a full description of the program.	☒	☐	☐
ii. A log book shall be used and shall be signed by the owner or operator at the completion of each inspection. A section of the log book shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility.	☐	☒	☐
iii. Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt to repair shall be made as soon as practicable, but not later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak. Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The owner or operator shall provide in its semiannual report the reason(s) why the repair was not feasible and the date each repair was completed.	☐	☒	☐
iv. For each leak that is detected, the following information:			
a. The equipment type and identification number;	☐	☐	☒
b. The nature of the leak (i.e. vapor or liquid) and the method of detection;	☐	☐	☒
c. The date the leak was detected and the date of each attempt to repair the leak;	☐	☐	☒
d. The repair methods applied in each attempt to repair the leak;	☐	☐	☒
e. If the leak is not repaired within 15 calendar days of detection,	☐	☐	☒

AIR QUALITY INSPECTION
Small Bulk Gasoline Plant
(Gasoline Throughput less than 20,000 Gallons per Month)
SPECIFIC CONDITIONS - Page 6

Inspector Initials JPR

Bulk Gasoline Plant **Permit: 10-A-575** **Operating** **Opacity: N/A**	**In Compliance**	**Out of Compliance (Comments)**	**Not Applicable or Unable to Evaluate**
the reason for the delay;			
f. The expected date of successful repair of the leak if the leak is not repaired within 15 days; and	☐	☐	☒
g. The date of the successful repair of the leak.	☐	☐	☒
Acceptable methods of documenting the location of leak(s) include, but are not limited to: tagging the leak, written descriptions, photographs, written work orders, diagrams or a combination of these methods.			
D. The owner or operator shall submit a report to the Iowa DNR, Air Quality Bureau for any month in which the gasoline throughput exceeded the monthly limit of 19,999 gallons. This report shall be submitted no later than 30 days after the exceedance and shall include the following information: facility identification, the month of the exceedance and the actual gasoline throughput (gallons) for the month. If more than one exceedance occurs in any 12 month period, the permittee shall be required to apply for a construction permit that will allow for the gasoline throughput to be increased above 19,999 gallons per month.	☐	☐	☒
E. The owner or operator shall submit a semiannual excess emissions report to the Iowa DNR, Air Quality Bureau which includes the following information:			
i. For equipment leak detections, the number of equipment leaks not repaired within 15 days after detection; and	☐	☐	☒
ii. For each occurrence of an equipment leak for which no repair attempt was made within 5 days or for which repair was not completed within 15 days after detection:			
a. The date on which the leak was detected;	☐	☐	☒
b. The date of each attempt to repair the leak;	☐	☐	☒
c. The reasons for the delay of repair; and	☐	☐	☒
d. The date of successful repair.	☐	☐	☒
These reports shall cover the period from January 1 to June 30 and from July 1 to December 31 of each calendar year. The reports shall be submitted by no later than 30 days from the end of the 6-month period. If no excess emission events occurred during the 6-month period, no report is required to be submitted.			
(1) In gasoline service means that a piece of equipment is used in a system that transfers gasoline or gasoline vapor.			
Comments: Operator needs to keep documentation of monthly leak inspections of all equipment in gasoline service (as covered in 14. Operating Condition Monitoring, Item C.). A log book should be used for documenting the monthly leak inspections and should be signed by the owner or operator at the completion of each inspection. **Copies of required documentation should be kept at the facility location.**			