

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Matt Blunt, Governor • Doyle Childers, Director

www.dnr.mo.gov

FEB 28 2008

CERTIFIED MAIL: 7004 1350 0003 1415 5063
RETURN RECEIPT REQUESTED

Mr. Ivan Dalrymple
Plant Manager
Alcan Cable
20213 Whitefield Road
Sedalia, MO 65301-1519

RE: Alcan Cable, Facility ID 159-0022
Permit Number: OP2008-011

Dear Mr. Dalrymple:

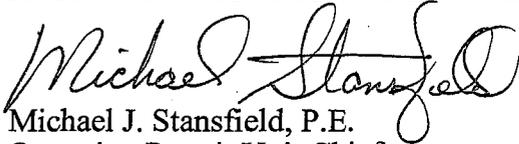
Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

You may appeal this permit to the Administrative Hearing Commission, P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the Administrative Hearing Commission within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the Administrative Hearing Commission.

If you have any questions or need additional information regarding this permit, please contact the departments' Air Pollution Control Program at P.O. Box 176, Jefferson City, MO 65102 or by telephone at (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS:dmn

Enclosure

c: Ms. Tamara Freeman, US Environmental Protection Agency Region VII
Kansas City Regional Office
PAMS File: 2007-03-032



Missouri Department of Natural Resources
Air Pollution Control Program

INTERMEDIATE STATE PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Intermediate Operating Permit Number: OP2008-011
Expiration Date: FEB 26 2013
Installation ID: 159-0022
Project Number: 2007-03-032

Installation Name and Address

Alcan Cable
20213 Whitfield Road
Sedalia, MO 65301-1519
Pettis County

Parent Company's Name and Address

RIO TINTO ALCAN
1188 Sherbrooke Street West
Montreal (QC) H3A 3G2.

Installation Description:

Alcan Cable, located in Sedalia, Missouri, is a manufacturer of insulated and non-insulated aluminum cable. Hazardous Air Pollutants are emitted from the production and labeling of the plastic wire coatings.

FEB 27 2008

Effective Date

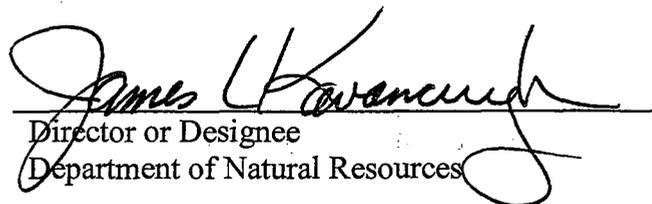

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Alcan Cable, located in Sedalia, Missouri, is a manufacturer of aluminum cable. The process involves receiving aluminum rods, which are then drawn and twisted to the desired electrical specifications. The wire is then heated in an annealing furnace to improve the mechanical and electrical properties of the wire. The wire may then be shipped bare or insulated. The insulation process involves melting various plastics and coating the wire, after which some of the wires are labeled using ink jet printers. Alcan Cable has the potential to be a major source of Hazardous Air Pollutant (HAP). Alcan Cable has accepted a voluntary condition to limit the emissions of any individual HAP to less than ten tons per year, and limit the emissions of all combined HAPs to less than 25 tons per year.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2006	0.23	0.02	3.07	8.62	2.58	--	7.018
2005	0.14	0.01	1.83	8.49	1.53	--	8.074
2004	0.26	0.03	3.43	6.75	2.73	--	6.093
2003	0.22	0.01	2.90	6.44	2.40	--	5.374
2002	0.18	0.03	2.69	11.76	1.98	--	9.530

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and which is identified as having unit-specific emission limitations.

Emission Unit #	Description of Emission Unit
EU0010	Steam Generator, Natural Gas Fired, 12.6 MMBtu/hr (E20)
EU0020	Outside Plastic Bead Silo Storage (2 Silos) (E21)

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

Description of Emission Source

Steam Generator (13.2 MMBtu Natural Gas fired, 1969) (E1)
 Hot Water Boilers #1&2 (0.87 MMBtu, Natural Gas Fired) (E2 & E3)
 Annealing Furnaces #1&2 (E4 & E5)
 Emergency Power Generator (E6)
 Coating Wire Insulation (E7)
 Inside Plastic Beads Storage (E8)
 Cable Print Correcting (E9)
 Extruding Flat lines 1 and 2 (E10)
 Draw Benches (E11)
 300 Gal Diesel Storage Tank (E12)
 Parts Washers (E13)

Insulating Compound - Fugitive Emissions (E14)
Miscellaneous Space Heaters (E15)
250 Gal Gas Storage Tank (E16)
75 Gal Diesel Storage Tank (E17)
Drawing Oil Storage Tank (E18)
Welding (E19)
Mix, Weigh and Convey Flat Line 2 Insulation (E22)
Flat line 2 Extruding (Part of E14) (E23)
Skim Extruding (Part of E14) (E24)
Label Printing (Part of E7) (E25)
Coating and Print Correcting (Part of E9) (E26)
Hot Reel Storage (Part of E14) (E27)
Sauna Curing (Part of E14) (E28)
Sauna Condensate (Part of E14) (E29)
Product Reel Storage (Part of E14) (E30)
Annealing Furnace #3 (E31)

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Air Pollution Control Program Construction Permit 072001-011
- 2) Air Pollution Control Program Construction Permit 072007-012

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

PERMIT CONDITION PW001

10 CSR 10-6.060 Construction Permits Required
Construction Permit #072007-012, Issued July 30, 2007

HAPs Emission Limitations:

- 1) Alcan Cable shall limit the entire installation to less than ten tons of any individual HAP emissions in any consecutive 12-month period.
- 2) Alcan Cable shall limit the entire installation to less than 25 tons of combined HAPs emissions in any consecutive 12-month period.

Monitoring/Recordkeeping:

- 1) Attachments A, B, and C, or equivalent forms shall be used to demonstrate compliance. The records must include each individual HAP identified on the Material Safety Data Sheet (MSDS) for the HAP containing products in use in the entire installation.
- 2) Alcan Cable shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include a MSDS for all materials used.

Reporting:

- 1) Alcan Cable shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten days after the end of the month during which records indicate that the source exceeds the emission limitations listed above.
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Programs' Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

EU0010 – Steam Generator		
Emission Unit	Description	2006 EIQ Reference #
EU0010	Steam Generator, Natural Gas Fired, 12.6 MMBtu/hr (2000)	E20

Permit Condition EU0010-001

10 CSR 10-6.070

New Source Performance Regulations

40 CFR Part 60 Subpart Dc

Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Operational Limitation:

This emission unit shall be limited to burning pipeline grade natural gas.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain records containing monthly totals of the natural gas that is combusted in this emission unit. This record shall serve as documentation that this emission unit is exclusively using pipeline grade natural gas as fuel.
- 2) All records shall be maintained onsite for a minimum of five years and shall be made available to Department of Natural Resources' personnel upon request.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Programs' Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

EU0020 – Outside Plastic Bead Silo Storage		
Emission Unit	Description	2006 EIQ Reference #
EU0020	Outside Plastic Bead Silo Storage (2 Silos)	E21

PERMIT CONDITION EU0020-001

10 CSR 10-6.060 Construction Permits Required

Construction Permit #72001-011, Issued May 30, 2001

Operational Requirements:

Alcan Cable shall use rotary air locks system to transfer plastic pellets from the outside storage silos (Emission Point, E21).

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than 18 months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 3) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the EIQ form or equivalent approved by the director.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:

- a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
- b) Paving or frequent cleaning of roads, driveways and parking lots;
- c) Application of dust-free surfaces;
- d) Application of water; and
- e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-3.030 Open Burning Restrictions

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
 - a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
 - b) The schedule of burning operations;
 - c) The exact location where open burning will be used to dispose of the trade wastes;
 - d) Reasons why no method other than open burning is feasible; and
 - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt Alcan Cable from the provisions of any other law, ordinance or regulation.
- 5) The permittee shall maintain files with letters from the director approving the open burning operation and previous Department of Natural Resources inspection reports.

10 CSR 10-3.090 Restriction of Emission of Odors

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. **This requirement is not federally enforceable.**

**10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61
Subpart M National Emission Standard for Asbestos**

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

**10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business
Exemption Requirements**

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Department of Natural Resources' Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.

- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
 - 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";

- iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
- b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Recordkeeping and Reporting Requirements

- 1) Recordkeeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(5)(C)1.A General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

None

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by June 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as Environmental Protection Agency (EPA) Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Mr. Ivan Dalrymple, Plant Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs.

All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;
or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) The Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

Attachment D
Sample of Screen Modeling Action Levels for Individual Hazardous Air Pollutants

Chemical	CAS#	Emission Threshold Levels (tons/year)	Synonyms
Acetaldehyde	75-07-0	9	Acetic Aldehyde, Aldehyde, Ethanal, Ethyl Aldehyde
Acetamide	60-35-5	1	Acetic Acid Amide, Ethanamide
Acetonitrile	75-05-8	4	Methyl Cyanide, Ethanenitrile, Cyanomethane
Acetophenone	98-86-2	1	Acetylbenzene, Methyl Phenyl Ketone, Hypnone
Acetylaminofluorine, [2-]	53-96-3	0.005	N-2-Fluorenyl Acetamide, N-Fluorenyl Acetamide, 2-Acetamideofluorene
Acrolein	107-02-8	0.04	Acrylaldehyde, Acrylic Aldehyde, Allyl Aldehyde, Propenal
Acrylamide	79-06-1	0.02	Propenamide, Acrylic Amide, Acrylamide Monomer, Ethylenecarboxamide
Acrylic Acid	79-10-7	0.6	Propenoic Acid, Ethylene Carboxylic Acid, Vinylformic Acid
Acrylonitrile	107-13-1	0.3	Vinyl Cyanide, Cyanoethylene, Propenenitrile
Allyl Chloride	107-05-1	1	1-Chloro-2-Propene, 3-Chloropropylene, Chloroallylene, Alpha-Propylene
Aminobiphenyl, [4-]	92-67-1	1	Biphenylene, P-Phenylaniline, Xenylamine, 4-Aminodiphenyl, 4-Biphenylamine
Aniline	62-53-3	1	Aminobenzene, Phenylamine, Aniline Oil, Aminophen, Arylamine
Anisidine, [Ortho-]	90-04-0	1	O-Methoxyaniline
Antimony Compounds (except spec. listed)		5	Antimony (Pentachloride, Tribromide, Trichloride, Trifluoride)
Antimony Pentafluoride	7783-70-2	0.1	
Antimony Potassium Tartrate	28300-74-5	1	
Antimony Trioxide	1309-64-4	1	
Antimony Trisulfide	1345-04-6	0.1	
Arsenic and Inorganic Arsenic Compounds		0.005	Arsenic (Diethyl, Disulfide, Pentoxide, Trichloride, Trioxide, Trisulfide), Arsinine, Arsenous Oxide
Benz(a)Anthracene	56-55-3	0.01	
Benz(c)acridine	225-51-4	0.01	
Benzene	71-43-2	2	Benzol, Phenyl Hydride, Coal Naphtha, Phene, Benzole, Cyclohexatriene
Benzidine	92-87-5	0.0003	4,4'-Biphenyldiamine, P-Diaminodiphenyl, 4,4'-Diaminobiphenyl, Benzidine Base
Benzo(a)pyrene	50-32-8	0.01	
Benzo(b)fluoranthene	205-992	0.01	
Benzotrichloride	98-07-7	0.006	Benzoic Trichloride, PhenylChloroform, Trichloromethylbenzene
Benzyl Chloride	100-44-7	0.1	Alpha-Chlorotoluene, Toly Chloride
Beryllium Compounds (except Beryllium Salts)		0.008	Beryllium (Acetate, Carbonate, Chloride, Fluoride, Hydroxide, Nitrate, Oxide)
Beryllium Salts		0.00002	
Bis(Chloroethyl)Ether	111-44-4	0.06	Dichloroethyl ether, Dichloroether, Dichloroethyl Oxide, BCEE
Bis(Chloromethyl)Ether	542-88-1	0.0003	BCME, Sym-Dichloromethyl ether, Dichloromethyl Ether, Oxybis-(Chloromethane)
Butadiene, [1,3-]	106-99-0	0.07	Biethylene, Biviny, Butadiene Monomer, Divinyl Erythrene, Vinylethylene

Chemical	CAS#	Emission Threshold Levels (tons/year)	Synonyms
Butylene Oxide, [1,2-]	106-88-7	1	1,2-Epoxybutane, 1-Butene Oxide, 1,2-Butene Oxide, Butylene Oxide, Ethylethylene
Cadmium Compounds		0.01	Cadmium (Dust, Fume, Acetate, Chlorate, Chloride, Fluoride, Oxide, Sulfate, Sulfide)
Carbon Disulfide	75-15-0	1	Carbon Bisulfide, Dithiocarbonic Anhydride
Carbon Tetrachloride	56-23-5	1	Tetrachloromethane, Perchloromethane
Carbonyl Sulfide	463-58-1	5	Carbon Oxide Sulfide, Carbonoxysulfide
Catechol	120-80-9	5	Pyrocatechol, O-Dihydroxybenzene
Chloramben	133-90-4	1	3-Amino-2,5-Dichlorobenzoic Acid, Amben, Amiben*, Vegiben* (*Trademark)
Chlordane	57-74-9	0.01	ENT9932, Octachlor
Chlorine	7782-50-5	0.1	Bertholite
Chloroacetic Acid	79-11-8	0.1	Monochloroacetic Acid, Chloroethanoic Acid
Chloroacetophenone, [2-]	532-27-4	0.06	Phenacyl Chloride, Chloromethyl Phenyl Ketone, Tear Gas, Mace
Chlorobenzilate	510-15-6	0.4	Ethyl-4,4'-Dichlorobenzilate, Ethyl-4,4'-Dichlorophenyl Glycollate
Chloroform	67-66-3	0.9	Trichloromethane
Chloromethyl Methyl Ether	107-30-2	0.1	CMME, Methyl Chloromethyl Ether, Chloromethoxymethane, Monochloromethyl Ether
Chloroprene	126-99-8	1	2-Chloro-1,3-Butadiene, Chlorobutadiene, Neoprene Rubber Compound
Chromic Chloride	10025-73-7	0.1	
Chromium Compounds (except Hexavalent)		5	Chromium, Chromium(II) Compounds, Chromium (III) Compounds
Chromium Compounds, Hexavalent		0.002	Chromium (VI)
Chrysene	218-01-9	0.01	
Cobalt Carbonyl	12010-68-1	0.1	
Cobalt Metal (& compounds, except spec. listed)		0.1	Cobalt (Bromide, Chloride, Diacetate, Formate, Nitrate, Oxide, Sulfamate)
Coke Oven Emissions	8007-45-2	0.03	Coal Tar, Coal Tar Pitch, Coal Tar Distillate
Cresol, [Meta-]	108-39-4	1	3-Cresol, M-Cresylic Acid, 1-Hydroxy-3-Methylbenzene, M-Hydroxytoluene
Cresol, [Ortho-]	95-48-7	1	2-Cresol, O-Cresylic Acid, 1-Hydroxy-2-Methylbenzene, 2-Methylphenol
Cresol, [Para-]	106-44-5	1	4-Cresol, P-Cresylic Acid, 1-Hydroxy-4-Methylbenzene, 4-Hydroxytoluene
Cresols/ Cresylic Acid (isomers and mixture)	1319-77-3	1	
Cyanide Compounds (except specifically listed)	20-09-7	5	Cyanide (Barium, Chlorine, Free, Hydrogen, Potassium, Silver, Sodium, Zinc)
DDE (p,p'-Dichlorodiphenyl Dichloroethylene)	72-55-9	0.01	
Di(2-Ethylhexyl)Phthalate, (DEHP)	117-81-7	5	Bis(2-ethylhexyl)Phthalate, Di(2-Ethylhexyl)Phthalate, DOP, Di-Sec-Octyl Phthalate
Diaminotoluene, [2,4-]	95-80-7	0.02	2,4-Toluene Diamine, 3-Amino-Para-Toluidine, 5-Amino-Ortho-Toluidine
Diazomethane	334-88-3	1	Azimethylene, Diazirine
Dibenz(a,h)anthracene	53-70-3		
Dibenzofuran	132-64-9	5	Diphenylene Oxide
Dibenzopyrene, [1,2:7,8]	189-55-9		
Dibromo-3-Chloropropane, [1,2-]	96-12-8	0.01	DBCP

Chemical	CAS#	Emission Threshold Levels (tons/year)	Synonyms
Dibromomethane, [1,2-]	106-93-4	0.1	Ethylene Dibromide, Ethylene Bromide, Sym-Dibromoethane
Dichlorobenzene, [1,4-]	106-46-7	3	1,4-Dichloro-P-DCB, 1-4-DCB, PDB, PDCB
Dichlorobenzidene, [3,3-]	91-94-1	0.2	4,4'-Diamino-3,3'-Dichlorobiphenyl, 3,3'-Dichlorobiphenyl-4,4'-Diamine, DCB
Dichloroethane, [1,1-]	75-34-3	1	Ethylidene Dichloride, 1,1-Ethylidene Dichloride, Asymmetrical Dichlorethane
Dichloroethane, [1,2-]	107-06-2	0.8	Ethylene Dichloride, Glycol Dichloride, Ethylene Chloride
Dichloroethylene, [1,1-]	75-35-4	0.4	Vinylidene Chloride, DCE, VDC
Dichloropropane, [1,2-]	78-87-5	1	Propylene Dichloride
Dichloropropene [1,3-]	542-75-6	1	1,3-Dichloropropylene, Alpha-Chlorallyl Chloride
Dichlorvos	62-73-7	0.2	DDVP, 2,2-Dichlorovinyl dimethylphosphate
Diethanolamine	11-42-2	5	Bis(2-Hydroxyethyl)Amine, 2,2'-Dihydroxydiethylamine, Di(2-Hydroxyethyl)Amine
Diethyl Sulfate	64-67-5	1	Diethyl Ester Sulfuric Acid, Ethyl Sulfate
Dimethoxybenzidine, [3,3-]	119-90-4	0.1	Fast Blue B Base, Dianisidine, O-Dianisidine
Dimethylbenz(a)anthracene, [7,12]	57-97-6	0.01	
Dimethyl Benzidine, [3,3-]	119-93-7	0.008	O-Tolidine, Bianisidine, 4,4'-Diamino-3,3'-Dimethylbiphenyl, Diaminoditoyl
Dimethyl Carbamoyl Chloride	79-44-7	0.02	DMCC, Chloroformic Acid Dimethyl Amide, Dimethyl Carbamyl Chloride
Dimethyl Formamide	68-12-2	1	DMF, Formyl dimethylamine
Dimethyl Hydrazine, [1,1-]	57-14-7	0.008	Unsymmetrical Dimethylhydrazine, UDMH, Dimazine
Dimethyl Sulfate	77-78-1	0.1	Sulfuric Acid Dimethyl Ester, Methyl Sulfate
Dimethylaminoazobenzene, [4-]	60-11-7	1	N,N-Dimethyl-P-Phenylazo-Aniline, Benzeneazo Dimethylaniline
Dimethylaniline, [N,N-]	121-69-7	1	N,N-Diethyl Aniline, N,N-Dimethylphenylamine, DMA
Dinitro-O-Cresol, [4,6-] and salts	534-52-1	0.1	DNOC, 3,5-Dinitro-O-Cresol, 2-Methyl-4,6-Dinitrophenol
Dinitrophenol, [2,4-]	51-28-5	1	DNP
Dinitrotoluene, [2,4-]	121-14-2	0.02	Dinitrotoluol, DNT, 1-Methyl-2,4-Dinitrobenzene
Dioxane, [1,4-]	123-91-1	6	1,4-Diethyleneoxide, Diethylene Ether, P-Dioxane
Diphenylhydrazine, [1,2-]	122-66-7	0.09	Hydrazobenzene, N,N'-Diphenylhydrazine, N,N'-Bianiline, 1,1'-Hydrodibenzene
Diphenylmethane Diisocyanate, [4,4-]	101-68-8	0.1	Methylene Bis(Phenylisocyanate), Methylene Diphenyl Diisocyanate, MDI
Epichlorohydrin	106-89-8	2	1-Chloro-2,3-Epoxypropane, EPI, Chloropropylene Oxide, Chloromethyloxirane
Ethyl Acrylate	140-88-5	1	Ethyl Propenoate, Acrylic Acid Ethyl Ester
Ethylene Imine (Aziridine)	151-56-4	0.003	Azacyclopropane, Dimethyleneimine, Ethylenimine, Vinylamine, Azirane
Ethylene Oxide	75-21-8	0.1	1,2-Epoxyethane, Oxirane, Dimethylene Oxide, Anprolene
Ethylene Thiourea	96-45-7	0.6	2-Imidazolidinethione, ETU
Fluomine	62207-76-5	0.1	
Formaldehyde	50-00-0	2	Oxymethylene, Formic Aldehyde, Methanal, Methylene Oxide, Oxomethane
Glycol Ethers (except those specifically listed)		5	
Heptachlor	76-44-8	0.02	1,4,5,6,7,8,8A-Heptachloro-3A,4,7,7A-Tetrahydro-4,7-Methanoindiene

Chemical	CAS#	Emission Threshold Levels (tons/year)	Synonyms
Hexachlorobenzene	118-74-1	0.01	Perchlorobenzene, HCB, Pentachlorophenyl Benzene, Phenyl Perchloryl
Hexachlorobutadiene	87-68-3	0.9	Perchlorobutadiene, 1,3-Hexachlorobutadiene, HCB
Hexachlorocyclopentadiene	77-47-4	0.1	HCCPD, HEX
Hexachloroethane	67-72-1	5	Perchloroethane, Carbon Hexachloride, HCE, 1,1,1,2,2,2-Hexachloroethane
Hexamethylene Diisocyanate, 1,6-	822-06-0	0.02	1,6-Diisocyanatohexane, 1,6-Hexanediol Diisocyanate
Hexamethylphosphoramide	680-31-9	0.01	Hexamethylphosphoric Triamide, HEMPA, Hexametapol, Hexamethylphosphoramide
Hydrazine	302-01-2	0.004	Methylhydrazine, Diamide, Diamine, Hydrazine Base
Hydrogen Fluoride	7664-39-3	0.1	Hydrofluoric Acid Gas, Fluorhydric Acid Gas, Anhydrous Hydrofluoric Acid
Hydrogen Selenide	7783-07-5	0.1	
Hydroquinone	123-31-9	1	Quinol, Hydroquinol, P-Diphenol, 1,4-Benzenediol, Hydrochinone, Arctivin
Indeno(1,2,3-cd)Pyrene	193-39-5	0.01	
Lead and Compounds (except specifically listed)	20-11-1	0.01	Lead (Acetate, Arsenate, Chloride, Fluoride, Iodide, Nitrate, Sulfate, Sulfide)
Lindane [Gamma-Hexachlorocyclohexane]	58-89-9	0.01	Benzene Hexachloride - Gamma Isomer
Maleic Anhydride	108-31-6	1	2,5-Furanediene, Cis-Butenedioic Anhydride, Toxic Anhydride
Manganese and Compounds (except spec. listed)	20-12-2	0.8	Manganese (Acetate, Chloride, Dioxide, (II)-Oxide, (III)-Oxide, (II)-Sulfate)
Mercury Compounds (except specifically listed)	20-13-3	0.01	Mercury Compounds (Methyl-, Ethyl-, Phenyl-)
Mercury Compounds (Inorganic)	20-13-3	0.01	Mercury (Chloride, Cyanide, (I,II)-[Bromide, Iodide, Nitrate, Sulfate], Oxide)
Methyl Hydrazine	60-34-4	0.06	Monomethylhydrazine, Hydrozomethane, 1-Methylhydrazine
Methyl Iodide	74-88-4	1	Idomethane
Methyl Isocyanate	624-83-9	0.1	Isocyanatomethane, Isocyanic Acid, Methyl Ester
Methylcyclopentadienyl Manganese	12108-13-3	0.1	
Methylene Bis(2-Chloroaniline), [4,4-]	101-14-4	0.2	Curene, MOCA, 4,4'-Diamino-3,3'-Dichlorodiphenylmethane
Methylenedianiline, [4,4-]	101-77-9	1	4,4'-Diaminodiphenylmethane, DDM, MDA, Bis(4-Aminophenyl)Methane, DAPM
Nickel Carbonyl	13463-39-3	0.1	
Nickel Compounds (except specifically listed)		1	Nickel (Acetate, Ammonium Sulfate, Chloride, Hydroxide, Nitrate, Oxide, Sulfate)
Nickel Refinery Dust	12035-72-2	0.08	
Nickel Sub sulfide		0.04	
Nitrobiphenyl, [4-]	92-93-3	1	4-Nitrodiphenyl, P-Nitrobiphenyl, P-Nitrophenyl, PNB
Nitrophenol, [4-]	100-02-7	5	4-Hydroxynitrobenzene, Para-Nitrophenol
Nitropropane, [2-]	79-46-9	1	Dimethylnitromethane, Sec-Nitropropane, Isonitropropane, Nitroisopropane
Nitroso-N-Methylurea, [N-]	684-93-5	0.0002	N-Methyl-N-Nitrosourea, N-Nitroso-N-Methylcarbamide
Nitrosodimethylamine, [N-]	62-75-9	0.001	Dimethylnitrosamine, DMN, DMNA
Nitrosomorpholine, [N-]	59-89-2	1	4-Nitrosomorpholine
Parathion	56-38-2	0.1	DNTP, Monothiophosphate, Diethyl-P-Nitrophenyl
PCB (Polychlorinated Biphenyls)	1336-36-3	0.009	Aroclors

Chemical	CAS#	Emission Threshold Levels (tons/year)	Synonyms
Pentachloronitrobenzene	82-68-8	0.3	Quintobenzene, PCNB, Quiniozene
Pentachlorophenol	87-86-5	0.7	PCP, Penchlorol, Pentachlorophenate, 2,3,4,5,6-Pentachlorophenol
Phenol	108-95-2	0.1	Carbolic Acid, Phenic Acid, Phenylic Acid, Phenyl Hydrate, Hydroxybenzene
Phosgene	75-44-5	0.1	Carbonyl Chloride, Carbon Oxychloride, Carbonic Acid Dichloride
Phosphine	7803-51-2	5	Hydrogen Phosphide, Phosphoretted Hydrogen, Phosphorus Trihydride
Phthalic Anhydride	85-44-9	5	Phthalic Acid Anhydride, Benzene-O-Dicarboxylic Acid Anhydride, Phthalandione
Polycyclic Organic Matter (except spec. listed)	TP15	0.01	POM, PAH, Polyaromatic Hydrocarbons,
Potassium Cyanide	151508	0.1	
Propane Sultone, [1,3-]	1120-71-4	0.03	1,2-Oxathiolane-2,2-Dioxide, 3-Hydroxy-1-Propanesulphonic Acid Sultone
Propiolactone, [Beta-]	57-57-8	0.1	2-Oxeatanone, Propiolactone, BPL, 3-Hydroxy-B-Lactone-Propanoic Acid
Propionaldehyde	123-38-6	5	Propanal, Propyl Aldehyde, Propionic Aldehyde
Propylene Oxide	75-56-9	5	1,2-Epoxypropane, Methylethylene Oxide, Methyl Oxirane, Propene Oxide
Propyleneimine, [1,2-]	75-55-8	0.003	2-Methyl Aziridine, 2-Methylazacyclopropane, Methylethyleneimine
Quinoline	91-22-5	0.006	1-Azanaphthalene, 1-Benzazine, Benzo(B)Pyridine, Chinoleine, Leucoline
Quinone	016-51-4	5	Benzoquinone, Chinone, P-Benzoquinone, 1,4-Benzooquinone
Selenium and Compounds (except spec. listed)	7782-49-2	0.1	Selenium (Metal, Dioxide, Disulfide, Hexafluoride, Monosulfide)
Sodium Cyanide	143339	0.1	
Sodium Selenate	13410010	0.1	
Sodium Selenite	101020188	0.1	
Styrene	100-42-5	1	Cinnamene, Cinnamol, Phenethylene, Phenylethylene, Vinylbenzene
Styrene Oxide	96-09-3	1	Epoxyethylbenzene, Phenylethylene Oxide, Phenyl Oxirane, Epoxystyrene
Tetrachlorodibenzo-P-Dioxin	1746-01-6	6.00E-07	
Tetrachloroethane, [1,1,2,2-]	79-34-5	0.3	Sym-Tetachloroethane, Acetylene Tetrachloride, Ethane Tetrachloride
Toluene Diisocyanate, [2,4-]	584-84-9	0.1	TDI, Tolyene Diisocyanate, Diisocyanatoluene
Toluidine, [Ortho-]	95-53-4	4	Ortho-Aminotoluene, Ortho-Methylaniline, 1-Methyl-1,2-Aminobenzene
Toxaphene	8001-35-2	0.01	Chlorinated Camphene, Camphechlor, Polychlorcamphene
Trichloroethane, [1,1,2-]	79-00-5	1	Vinyl Trichloride, Beta-Trichloroethane
Trichlorophenol, [2,4,5-]	95-95-4	1	2,4,5-TCP
Trichlorophenol, [2,4,6-]	88-06-2	6	2,4,6-TCP
Trifluralin	1582-09-8	9	2,6-Dinitro-N-N-Dipropyl-4-(Trifluoromethyl)Benzeneamine
Urethane [Ethyl Carbamate]	51-79-6	0.8	Ethyl Urethane, O-Ethylurethane, Leucothane, NSC 746, Urethan
Vinyl Acetate	108-05-4	1	Acetic Acid Vinyl Ester, Vinyl Acetate Monomer, Ethenyl Ethanoate
Vinyl Bromide	593-60-2	0.6	Bromoethylene, Bromoethene
Vinyl Chloride	75-01-4	0.2	Chloroethylene, Chloroethene, Monochloroethylene

STATEMENT OF BASIS

Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Intermediate Operating Permit Application, received March 9, 2007;
- 2) 2006 Emissions Inventory Questionnaire, received May 29, 2007; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 4) Air Pollution Control Program Construction Permit #1097-008
- 5) Air Pollution Control Program Construction Permit#0798-003
- 6) Air Pollution Control Program Construction Permit #112000-006, and amendment 112000-006A
- 7) Air Pollution Control Program Construction Permit #052005-021

Construction Permit History

Permit Number	Description
1097-008	Installation of three(3) ink jet printers
0798-003	Installation of one (1) ink jet printer
112000-006	Installation of a steam generator
112000-006A	Amendment of Permit number 112000-006
072001-011	Replace Extrusion Line
052005-021	Add Production Lines
072007-012	Facility expansion by installing additional cabling and armoring capacity.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100, *Alternate Emission Limits*

This rule is not applicable because the installation is in an ozone attainment area.

Construction Permit Revisions

The following revisions were made to construction permits for this installation:

Air Pollution Control Program Construction Permit #052005-021:

The conditions of this permit were superseded by Special Condition 1 of Air Pollution Control Program Construction Permit 072007-012.

Air Pollution Control Program Construction Permit #072001-011:

The emission point number used in Special Condition #1 is EP21, but the facility uses E21 for reporting purposes. The emission point reference in Special Condition #1 (Permit Condition EU0020-001) was changed to E21 for consistency. Exceedance/Deviation reporting language regarding the annual compliance certification was also inserted.

Within the equipment listed under this permit, emission units E22, E23, E24, & E25 (2006) are significant sources of Volatile Organic Compounds (VOC), but insignificant sources for PM. VOC emissions are not specifically addressed by Special Condition Number #1, which is the only condition in the construction permit. For this reason, these units were not listed as subject to the unit specific requirements in EU0020-001.

Within the emission review summary, CP 072001-011 provides a process weight limit under 10 CSR 10-6.400 for emission point E22, but because the particulate matter emitted from this process is fugitive, the unit is exempt by §6.400(B)7.

Air Pollution Control Program Construction Permit #072007-012

The special conditions in this permit were reworded to meet the current format. (Plantwide condition PW001)

New Source Performance Standards (NSPS) Applicability

40 CFR 60, Subpart Dc *Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units* applies to the 12.6 MMBtu Steam Generator (E20). The table below, labeled "Emission Unit and Permit Applicability Summary" provides the reasoning for the exclusion of the other heating units under this rule.

Maximum Available Control Technology (MACT) Applicability

None.

Other Regulatory Determinations

Emission Unit and Permit Applicability Summary			
Emission Point	Description	Construction Permit No. #	Operating Permit Condition (if applicable)
E1	Steam Generator (13.2 MMBtu NG fired, 1969)	N/A	Grandfathered, and NG fired
E2	Hot Water Boiler #1 (0.87 MMBtu NG)	N/A	Insignificant Source
E3	Hot Water Boiler #2 (0.87 MMBtu NG)	N/A	Insignificant Source
E4	Annealing Furnace #1, NG Fired	N/A	Exempt from CP by §6.061(3)(A)1C
E5	Annealing Furnace #2, NG Fired	N/A	Exempt from CP by §6.061(3)(A)1C
E6	Emergency Power Generator	N/A	Exempt per policy

E7	Coating Wire Insulation		
	2 ink printers	052005-021	Plantwide Condition PW001
	Contact printing	052005-021	Plantwide Condition PW001
	Coating operation	052005-021	Plantwide Condition PW001
E8	Inside Plastic Beads Storage	N/A	Insignificant fugitive PM source
E9	Cable Print Correcting	052005-021	Plantwide Condition PW001
E10	Extruding		
	Poly Line 1 (using PVC)	PW001	Insignificant fugitive PM sources,
	Poly Line 2 (using PVC)	PW001	HAPs limited by PW001
E11	Draw Benches	N/A	Insignificant Source
E12	300 Gal Diesel Storage Tank	N/A	Insignificant Source
E13	Parts Washers	N/A	Insignificant Source
E14	Insulating Compound - Fugitive Emissions		
	Moisture Cure 1 (Flat Line 1)	072007-012	Plantwide Condition PW001
	Moisture Cure 2(Flat Line 2)	072007-012	Plantwide Condition PW001
	CVI Line	072007-012	Plantwide Condition PW001
E15	Miscellaneous Space Heaters	N/A	Insignificant Source
E16	250 Gal Gas Storage Tank	N/A	Insignificant Source
E17	75 Gal Diesel Storage Tank	N/A	Insignificant Source
E18	Drawing Oil Storage Tank	N/A	Insignificant Source
E19	Welding	N/A	Insignificant Source
E20	Steam Generator (12.6 MMBtu NG (2000))	112000-006	Unit Specific Condition EU0010-001
E21	Outside Plastic Bead Silo Storage	072001-011	Unit Specific Condition EU0020-001
E22	Mix, Weigh and Convey Flat Line 2 Insulation	072001-011	
E23	Flatline 2 Extruding (Part of E14)	072001-011	Insignificant fugitive PM sources,
E24	Skim Extruding (Part of E14)	072001-011	HAPs limited by PW001
E25	Label Printing (Part of E7)	072007-012	Plantwide Condition PW001
E26	Coating and Print Correcting (Part of E9)	052005-021	Plantwide Condition PW001
E27	Hot Reel Storage (Part of E14)	072007-012	Plantwide Condition PW001
E28	Sauna Curing (Part of E14)	072007-012	Plantwide Condition PW001
E29	Sauna Condensate (Part of E14)	072007-012	Plantwide Condition PW001
E30	Product Reel Storage (Part of E14)	072007-012	Plantwide Condition PW001
E31	Annealing Furnace #3, 4 MMBtu, NG Fired	N/A	Exempt from CP by §6.061(3)(A)1C

CP 052005-021 Special Conditions superceded by CP 072007-012.

CP 072007-012 Special Conditions are implemented through Plantwide Condition PW001

CP 052005-021 Special Conditions are implemented through Plantwide Condition PW001

10 CSR 10-3.060 Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating

Annealing Furnaces E4, E5, and E31 are direct heating sources and not subject to this rule.

This rule does not apply to the 12.6 MMBtu Steam Generator (E20) because it is subject to §6.070 (NSPS Subpart Dc), and therefore exempted by §3.060(3)(E).

The rule applies to the 13.2 MMBtu Steam Generator (E1). This unit is considered an existing unit because it was constructed in 1969 (pre-1971).

This rule also applies to the Hot Water Boilers 1 and 2 (E2 and E3). The units all burn both natural gas and propane. The applicable emission limit for each unit is calculated as follows (from §3.060(4)(B));

Facility-wide heat input (indirect heating units) = 13.2 + 0.87 + 0.87 + 12.6 = 27.54 MMBtu

E = the Maximum Allowable Emission Rate = $0.9(Q)^{-0.174} = 0.9(27.4)^{-0.174} = 0.51 \text{ lb/MMBtu}$

Natural gas PM emission factor (lbs/MMBtu) = $\frac{7.6 \text{ lbs}/10^6 \text{ scf}}{1020 \text{ MMBtu}/10^6 \text{ scf}} = 7.45 \times 10^{-03} \text{ lb/MMBtu}$

(AP - 42 Table 1.4 - 2(7/98))

For LPG:

Propane PM Emission Factor (lbs/MMBtu) = $\left(\frac{0.4 \text{ lbs PM}}{1000 \text{ Gallon}} \right) \times \left(\frac{1000 \text{ Gallon}}{90.5 \text{ MMBtu}} \right) = 4.42 \times 10^{-03} \text{ lb/MMBtu}$

Butane PM Emission Factor (lbs/MMBtu) = $\left(\frac{0.5 \text{ lbs PM}}{1000 \text{ Gallon}} \right) \times \left(\frac{1000 \text{ Gallon}}{97.4 \text{ MMBtu}} \right) = 5.13 \times 10^{-03} \text{ lb/MMBtu}$

(AP - 42 Table 1.5 - 1(10/96))

As demonstrated, the expected emission rates from the remaining natural gas/LPG fired units are several orders of magnitude lower than the calculated emissions limit. Therefore, no provisions for this rule were included in this permit.

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants*

As demonstrated in the table under §6.400 below, the expected emission rates are less than 0.5 pounds per hour, and therefore not likely to exceed the visible emissions standard. Since the units other than E21 do not capture the emissions and release through a stack or vent, the emissions are also classified as fugitive. Fugitive emissions are addressed by 10 CSR 10-6.170, which is listed in the "Core Requirements" section of this permit. For these reasons, there are no visible monitoring requirements included for these units.

10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds*

Since both the direct and indirect heating sources at this facility combust natural gas/LPG, they are exempt from this rule by §6.260(1)(A)2.

10 CSR 10-6.390 *Control of NOx Emissions From Large Stationary Internal Combustion Engines*

This rule does not apply to the emergency generator because it is not located in one of the listed applicable counties in §6.390(1).

10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes*

The following table shows the PTE of the units that emit particulate matter. All units except for E21 are enclosed within the facility buildings.

Emission Point	Unit Description	MHDR ^{B, D} (tons/hr)	Emission Factor ^{A, B} (lb/ton)	Control Efficiency ^{B, E}	PM Emissions (lb/hr)
E8	Inside Plastic Beads Storage	0.643	0.10	50%	0.03
E10	Poly Line Extruding	3.50	0.2563	50%	0.45
E21	Outside Plastic Bead Silo Storage	4.75	0.2563	80%	0.24
E22	Mix, Weigh and Convey Flatline 2 Insulation	0.75	0.2563	50%	0.10
E23	^C Flatline 2 Extruding	0.75	0.062	50%	0.02
E24	Skim Extruding	0.75	0.062	50%	0.02

^AEmission factor from FIRE, SCC 30101811 Chemical Manufacturing/Plastics Production/Storage (0.1lb/ton stored)

^BEmission factor from FIRE, SCC 30101821 Chemical Manufacturing/Plastics Production/Extruding/Pelletizing/Conveying/Storage (2.563 E-1 lb/ton) E21 MHDR and Control Efficiency taken from CP #072001-011

^CEmission Factors for the extruders was taken from Project #2001-03-032, CP #072001-011

^D Inside Plastic Bead Silo Storage MHDR taken from CP#072007-012

^EA Control Efficiency of 50% was given for the units being enclosed.

Emission Unit E21 - EU0010-001 requires the facility to utilize the air lock system when transferring plastic beads. As illustrated in the table above, the PM emission rate is less than 0.5 lbs/hr after accounting for the permitted control efficiency of 80%, therefore the unit is considered an insignificant source per §6.400(1)(B)11. For this reason, no specific requirements were included for emission unit E21 under this rule.

This rule does not apply to the remaining emission units because their particulate emissions are considered fugitive, and exempt by §6.400(B)7. Fugitive emissions are addressed by 10 CSR 10-6.170, which is listed in the core requirements section of this permit.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.
- 4) The installation does not contain the type of emission unit that is regulated by that rule.
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Alcan Cable
Installation ID: 159-0022

Intermediate Operating Permit SB - 6
Project No. 2007-03-032

Prepared by:



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