



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 herein.

Intermediate Operating Permit Number: OP2012-049
Expiration Date: OCT 30 2017
Installation ID: 510-0938
Project Number: 2006-12-069

Installation Name and Address

Interstate Brands Corporation
6301 North Broadway
St. Louis, MO 63147
St. Louis City

Parent Company's Name and Address

Hostess Brands, Inc.
6031 Connection Drive, Suite 600
Irving, TX 75039

Installation Description:

Interstate Brands Corporation (IBC) is a bakery that manufactures Hostess Cakes, Wonder Breads and related products. They receive flour, sugar, oil, cocoa and yeast, mix ingredients on site, and prepare breads, buns and cakes by baking.

OCT 31 2012

Effective Date


Director of Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Interstate Brands Corporation (IBC) is a bakery that manufactures Hostess Cakes, Wonder Breads and related products. They receive flour, sugar, oil, cocoa and yeast, mix ingredients on site, and prepare breads, buns and cakes by baking. They have process and storage tanks and silos, and various boilers for process heat. The actual emissions for the past five years for the installation, as reported on the annual Emission Inventory Questionnaire (EIQ) are listed below:

Reported Air Pollutant Emissions, tons¹ per year					
Pollutants	2010	2009	2008	2007	2006
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.02	0.33	0.11	0.11	6.27
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.02	0.33	0.11	0.11	6.27
Sulfur Oxides (SO _x)	0.00	0.03	0.01	0.01	0.01
Nitrogen Oxides (NO _x)	0.30	4.30	2.12	2.12	3.14
Volatile Organic Compounds (VOC)	50.08	55.67	43.55	47.78	54.17
Carbon Monoxide (CO)	0.25	3.61	1.27	1.27	1.88
Lead (Pb)	--	--	--	--	--
Hazardous Air Pollutants (HAPs)	1.50	1.50	1.22	1.35	1.64
Ammonia (NH ₃)	0.01	0.14	0.05	0.05	0.07

EMISSION UNITS WITH LIMITATIONS

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

Emission Point	Emission Point Description	Equipment Number
<i>EP001</i>	Bread/Bun Flour Silos, Bulk Flour Bins, Semco silos with shared stack, constructed 1969, CD001 (baghouse)	
<i>EP002</i>	Bread/Bun Flour Transfer System, Bulk Flour Transfer System, CD002 (baghouse)	
<i>EP005</i>	Sugar Silos, (3) Sugar Silos #1, #2 & #3, constructed 1967, CD003 (baghouse, installed 1987)	

¹ Throughout this permit, when the term “tons” is used, English short tons are intended, unless otherwise noted.

Emission Point	Emission Point Description	Equipment Number
<i>EP006</i>	Refinery Sugar Transfer System, CD004 (baghouse, Pfennig bag filter)	
<i>EP007</i>	Sugar Cocoa Transfer System, sugar and cocoa transferred from separate bins to combination bin via transfer system, constructed in 1969, CD005 (Semco baghouse)	

EMISSION UNITS WITHOUT LIMITATIONS

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

Emission Point	Emission Point Description	Equipment Number
<i>EP003</i>	Bread Oven - Natural Gas Fired, Sponge Dough, 6.435 mmBtu per hour, Baker-Perkins Model #960, constructed 1969	
<i>EP004</i>	Bun Oven - Natural Gas Fired, Sponge Dough, 3.54 mmBtu per hour, Baker-Perkins Model #960, constructed 1969	
<i>EP019</i>	Pan Washers #1&2, Dryer end: (2) at 4.2 mmBtu per hour each, Alvey, constructed 1967. Washer end: steam from Kewanee Boilers #1, #2 & #3 heats water.	
<i>EP012</i>	Cream Mixer Boiler, 1.05 mmBtu per hour, Hurst Icing Boiler Model #4VT-G-25-150, constructed 2003	
<i>EP013</i>	West Taylor Boiler, 4.185 mmBtu per hour, Kewanee Model #L35-100-G0, 100 horsepower, constructed 1983	
<i>EP014</i>	Kewanee Boiler #1, 10.172 mmBtu per hour, Model #KCP86-FG, constructed 1967	
<i>EP015</i>	Kewanee Boiler #2, 10.172 mmBtu per hour, Model #KGP-86F-G0, constructed 1967	
<i>EP016</i>	Kewanee Boiler #3, 12.554 mmBtu per hour, Model #L3S-300-KG0, 1967	
<i>EP018</i>	East Taylor Boiler, 0.68 mmBtu per hour, National US, constructed 1967	
	(14) Space Heaters, Total 3.060 mmBtu per hour - various, constructed 1967	
<i>EP008</i>	Cake Line #1 Oven - Natural Gas Fired, 3.180 mmBtu per hour, Baker Perkins model #960, constructed 1967	
<i>EP009</i>	Cake Line #2 Oven - Natural Gas Fired, 3.180 mmBtu per hour, Baker Perkins model #960, constructed 1967	
<i>EP022</i>	(11) Ink Jet Label Printers – Videojet, [(8) in operation at any given time, (3) backup], model # 170	
	(6) Ink Jet Label Printers – Domino, model # A400	
	(1) Ink Jet Label Printer – Linx, model # Diagraph 6200	
<i>EP024</i>	(3) Bulk Sugar Bins	

Emission Point	Emission Point Description	Equipment Number
<i>EP025</i>	Cooling Tower	

DOCUMENTS INCORPORATED BY REFERENCE

This permit incorporates the following documents by reference:

- (1) City of St. Louis Permit dated June 17, 1993, issued to Continental Baking Company for an existing Bakery Operation, based on an application dated March 12, 1993.

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.

The following requirements apply to all conditions in addition to any other requirements listed in the specific conditions, unless otherwise noted in the specific conditions.

Monitoring:

The permittee shall calibrate, maintain and operate all instruments and control equipment according to the manufacturer's recommendations or according to good engineering practices.

Recordkeeping:

The permittee shall record all required recordkeeping (i.e. inspections and corrective actions) in the appropriate format. Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations.

Reporting²:

- 1) The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance of any of the terms imposed by this permit, no later than ten (10) days after the exceedance or event causing the exceedance (unless otherwise specified in the specific condition), to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
- 2) The permittee shall submit an annual certification³ 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. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. These certifications shall be submitted annually by **April 1st**, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.

² Refer to Section V. General Permit Requirements, 10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Recordkeeping and Reporting Requirements, page 18, for additional details.

³ Refer to Section V. General Permit Requirements, 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, page 20, for more details.

Permit Condition PW1

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:

The permittee shall not exceed a limit of 100 tons of volatile organic compounds (VOC) total per consecutive twelve (12)-month rolling period.

Monitoring / Recordkeeping:

The permittee shall maintain accurate monthly and twelve (12)-month rolling records of VOC emissions.

The permittee shall use Attachment E (Plant wide VOC Emissions, page 28), or its equivalent, for tracking compliance with this condition.

Permit Condition PW2

All Direct and Indirect Heating Sources⁴

10 CSR 10-6.405 Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating

Emission Limitations:

All Direct and Indirect Heating Sources shall be limited to burning landfill gas, propane, natural gas, fuel oils #2 through #6 (with less than one and two-tenths percent (1.2%) sulfur), and/or other gases (with hydrogen sulfide levels less than or equal to four (4) parts per million volume as measured using ASTM D4084, or equivalent and mercury concentrations less than forty (40) micrograms per cubic meter as measured using ASTM D5954, or ASTM D6350, or equivalent).

⁴ These include, but not exclusively, any boilers, dryers or fryers. It does not include portable spot space heaters.

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 on the date of permit issuance.

Visible Emission Sources	
Stack ID	Description
All Sources	Any part or activity of an installation that emits or has the potential to emit any regulated air pollutant.

Permit Condition
Visible Emission Sources 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitations:

The permittee shall not discharge into the ambient air from any source, not exempted under 10 CSR 10-6.220, any air contaminant of opacity greater than twenty (20%) percent. A source with a 20% opacity limit may emit air contaminants with opacity over 20%, but not greater than 40% for an aggregate length of time not to exceed six (6) minutes in any 60 minutes. Where the presence of uncombined water is the only reason for failure of an emission to meet the opacity requirements, the opacity requirements shall not apply.

Monitoring / Recordkeeping:

The permittee will follow the monitoring and recordkeeping requirements listed in Section IV. Core Permit Requirements for 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants, starting on page 16.

Baghouse Group			
Emission Unit	Emission Unit Description	Equipment Number	Control Devices
EP001	BREAD/BUN FLOUR SILOS	CD001	baghouse
EP002	BREAD/BUN FLOUR TRANSFER SYS	CD002	baghouse
EP005	SUGAR SILOS	CD003	baghouse
EP006	REFINERY SUGAR TRANSFER SYSTEM	CD004	baghouse

Baghouse Group			
Emission Unit	Emission Unit Description	Equipment Number	Control Devices
EP007	SUGAR COCOA TRANSFER SYSTEM	CD005	baghouse

<p style="text-align: center;">Permit Condition 1 Baghouse Group 10 CSR 10-6.400 Restriction of Particulate Matter from Industrial Processes 10 CSR 10-6.060 Construction Permits Required: Permit Issued June 21, 1993 by the City of St. Louis for an existing Bakery Operation</p>
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Emission Limitations:

The permittee shall insure the *Baghouse Group* emission units vent to the control devices when operating.

Monitoring / Recordkeeping:

The permittee shall maintain an operating and maintenance log for the control device using Attachment D (or its equivalent), Inspection/Maintenance/Repair/Malfunction Log (found on page 27) which shall include the following:

- 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
- 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

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 on the date of permit issuance. The following is only an excerpt from the regulation or code, and is provided for summary purposes only.

St. Louis City Ordinance 68657 Section 6 & Section 15 – Open Burning Restrictions⁵

Section Six. *Definitions*

This Section defines key words and expressions used in the Ordinance. The following definitions are in addition to those contained in State Rule 10 CSR 10-6.020, as amended.

23. Open Burning - The burning of any matter in such manner that the products of combustion resulting from the burning are emitted directly into the ambient air without passing through an approved stack, duct, vent or chimney.

29. Refuse - Any combustible waste material containing carbon in a free or combined state, other than liquids or gases.

30. Salvage Operation - Any business, trade, industry or other activity conducted in whole or in part for the purpose of salvaging or reclaiming any product or material including but not limited to metals or chemicals.

34. Trade Waste - Solid, liquid, or gaseous material resulting from construction or the prosecution of any business, trade or industry, or any demolition operation including but not limited to wood, plastics, cartons, grease, oil, chemicals and cinders.

36. Vegetation - Any representative of the plant kingdom including, but not limited to trees, shrubs, grasses, or vegetables, and any anatomical part of these plants including but not limited to leaves, stems, roots, flowers or fruits.

Section Fifteen: *Open Burning Restrictions.*

- A. No person shall cause, suffer, allow, or permit the open burning of refuse.
- B. No person shall conduct, cause or permit the conduct of a salvage operation by open burning.
- C. No person shall conduct, cause or permit the disposal of trade waste by open burning.
- D. No person shall cause or permit the open burning of leaves, trees or the byproducts therefrom, grass, or other vegetation.
- E. It shall be prima-facie evidence that the person who owns or controls property on which open burning occurs, has caused or permitted said open burning.

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:

⁵ This ordinance is a part of the Missouri state implementation plan, and as such, is federally enforceable.

- a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
 - ii) Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
 - iii) St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
 - iv) St. Louis metropolitan area. The open burning of household refuse is prohibited;
- b) Yard waste, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 - ii) Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
 - iii) St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
 - (1) A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
 - (2) A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
 - (3) The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - (4) In each instance, the twenty-one (21)-day burning period shall be determined by the director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the department director; and
 - iv) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- 3) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- 4) Interstate Brands Corporation may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the

open burning permit application. The permit may be revoked if Interstate Brands Corporation fails to comply with the provisions or any condition of the open burning permit.

- a) In a nonattainment area, as defined in 10 CSR 10-6.020, Paragraph (2)(N)5., the director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 5) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.
- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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 eighteen 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 10-6.080 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 10-6.100 Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

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 may be required by the director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full EIQ for the 2011, 2014, 2017, and 2020 reporting years. In the interim years, the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 5) Full paper EIQs shall be submitted to the Air Pollution Control Program by no later than April 1st after the end of the reporting year. Full electronic EIQs shall be submitted via MoEIS by no later than May 1st after the end of the reporting year.
- 6) Emission fees are due by no later than June 1st after the end of each reporting year. The fees shall be payable to the Missouri Department of Natural Resources.
- 7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

Emission Limitation:

- 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 10-5.060 Refuse Not to be Burned in Fuel Burning Installations (Contained in State Implementation Plan)

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

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.

10 CSR 10-5.240 Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area

The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:

- 1) Areas in which there are one or more existing sources and/or proposed new sources of particulate matter in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from these sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.
- 2) Areas in which there are one or more existing sources and/or proposed new sources of sulfur dioxide in any circular area with a diameter of two miles from which the sum of sulfur dioxide emissions from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per hour.

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

Emission Limitation:

No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units.

Monitoring:

- 1) The permittee shall conduct opacity readings on each emission unit using procedures similar to U.S. EPA Test Method 22.

In all cases, the permittee shall insure that all persons responsible for making visible emission observations acquire basic training in the general principles and practices of “reading” opacity. At a minimum, the observers should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water. EPA’s Reference Method 22, found at 40 CFR Part 60, Appendix A, suggests two references in Section 7 that may be helpful.

The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.

- 2) The permittee must maintain the following monitoring schedule⁶:
 - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
 - b) Should the permittee observe no violations of this regulation during this period then-
 - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - ii) If a violation is noted, monitoring reverts to weekly.
 - iii) Should no violation of this regulation be observed during this period then-
 - (1) The permittee may observe once per month.
 - (2) If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

The permittee shall maintain records of all observation results using Attachments B (Opacity Emission Observations, page 25) or C (Method 9 Opacity Emissions Observations, page 26) [or their equivalent], noting:

- 1) Whether any air emissions (except for water vapor) were visible from the emission units;
- 2) All emission units from which visible emissions occurred;
- 3) Whether the visible emissions were normal for the process;
- 4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
- 5) The permittee shall maintain records of all U.S. EPA Method 9 opacity tests performed.

⁶The reissuance of this operating permit will not affect the frequency of monitoring. The permittee may continue their current monitoring schedule for all affected emission units.

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 recordkeeping 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.
- 5) 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)(E)2 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 Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program's 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 Missouri 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 semi-annually (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 April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program's 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 recordkeeping 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 EPA Region VII, 901 North 5th Street, Kansas City, KS 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 Alan Goldstein, Plant Manager. The permitting authority received notice that the current responsible official is Matt Stringer, 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 Missouri Department of Natural Resources (MDNR) 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 Missouri 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 C

Method 9 Opacity Emissions Observations								
Company					Observer			
Location					Observer Certification Date			
Date					Emission Unit			
Time					Control Device			
Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							
SUMMARY OF AVERAGE OPACITY								
Set Number	Time				Opacity			
	Start	End		Sum	Average			

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____
 YES NO Signature of Observer

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 December 22, 2006; revised November 30, 2009;
- 2) Intermediate Operating Permit Application, received September 28, 2001(Project #2002-01-114);
- 3) Initial Intermediate Operating Permit Application accepted December 6, 1996, as OP96001;
- 4) 2005 Emissions Inventory Questionnaire (amended), received October 19, 2006;
- 5) 2008 Emissions Inventory Questionnaire, received 1 June 2009;
- 6) Air Pollution Emergency Action Plan for the St. Louis Bakery dated March 20, 2009;
- 7) Report from Full Compliance Inspection on May 21-22, 2007;
- 8) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition; and
- 9) City of St. Louis Ordinance 65645 *St. Louis Air Pollution Control Ordinance*.

Project History

Project ID	Start Date	Expires	Project Type	Status	Completion Date	Permit No	Description
200201114	01/22/02	01/21/07	Intermediate Operating Permit Renewal	Closed out, per policy	01/08/07		Baked Goods
199612002	12/06/96	12/06/01	Local Issued OP	OP Application Replaced by New Submittal	01/28/02	OP96001	Bread-Intermediate
200912052	11/30/09		Intermediate Operating Permit Amendment	OP Application Replaced by New Submittal	05/10/10		Responsible Official
201004028	04/08/10		Int. Operating Permit Off-Permit Changes	Request Approved	04/20/10		Emergency Action Plan
201011006	11/01/10		Part 70 Operating Permit Admin. Amendment	OP Application Replaced by New Submittal	06/24/11		Responsible Official
201011007	11/01/10		Part 70 Operating Permit Off-Permit Changes	OP Application Replaced by New Submittal	06/24/11		Emergency Plan Changes

Other Air Regulations Determined Not to Apply to the Permittee

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

10 CSR 10-5.300 Control of Emissions from Solvent Metal Cleaning

There are no parts washers which contain cleaning materials regulated by this rule. If there is a change of operations which introduces a regulated solvent metal cleaning compound at the installation it will immediately become subject to the requirements of this rule.

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

Section (1)(A)2. of this rule exempts combustion equipment that uses exclusively pipeline grade natural gas or liquefied petroleum gas, or any combination of these fuels. The combustion units at the installation use (or are limited to use) exclusively pipeline grade natural gas and are exempt from the requirements of this rule, therefore there are no emission limits applied to these units. The following emission units listed in Table #SB1 are exempt from the requirements of this rule:

Table #SB1: 10 CSR 10-6.260 Compliance Demonstration

Equipment	Direct or Indirect	Total MMBtu/hour	Fuel
Bread Oven	Direct	6.435	Natural Gas
Bun Oven	Direct	3.54	Natural Gas
Cake Ovens #1&2	Direct	2.1	Natural Gas
Cream Mixer Boiler	Indirect	1.05	Natural Gas
West Taylor Boiler	Indirect	4.185	Natural Gas
Kewanee Boilers #1&2	Indirect	20.344	Natural Gas
Kewanee Boiler #3	Indirect	12.554	Natural Gas
East Taylor Boiler	Indirect	0.680	Natural Gas
(14) Space Heaters	Indirect	3.060	Natural Gas
Pan Washers #1&2	Direct	8.4	Natural Gas

10 CSR 10-5.440 Control of Emissions from Bakery Ovens

This rule does not apply to this installation. The rule applies to new or existing commercial bakeries in the St. Louis Metropolitan Area whose potential emissions are greater than one hundred tons per year (100 tpy). This rule was implemented as required by the federal Clean Air Act for moderate non-attainment areas for ozone, of which City of St. Louis is part. The unconditioned potential VOC emissions of the installation are greater than 100 tpy, primarily ethanol. Prior to obtaining Intermediate State Operating Permit OP96001, the permittee had requested a voluntary limit of 95 tpy VOC emissions from the bakery ovens and were required to demonstrate that they had never emitted more than 100 tpy. Since obtaining an Intermediate Operating Permit requires the installation to remain below the major source thresholds, this rule does not apply.

Construction Permit Revisions

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

10 CSR 10-6.060 Construction Permits Required

Permit Issued June 21, 1993 by the City of St. Louis for an existing Bakery Operation

The throughput limits were removed because the total particulate matter emission potential is about half of the de minimis emission rate threshold, and the limits appear to be a reiteration of the designs of the equipment.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*.

All construction, reconstruction, or modification to the boilers at the installation took place prior to June 9, 1989. (This subpart applies to each steam generating unit for which construction, modification, or reconstruction commenced after June 9, 1989.)

Maximum Achievable Control Technology (MACT) Applicability

None

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

Other Regulatory Determinations

10 CSR 10-5.220 *Control of Petroleum Liquid Storage, Loading and Transfer*

This rule does not apply because Interstate Brands does not have any fuel tanks at the installation.

10 CSR 10-5.385 *Control of Heavy Duty Diesel Vehicle Idling Emissions*

This rule became effective January 28, 2009, in the St. Louis Eight (8) Hour Ozone Non-Attainment Area. It applies to owners or operators of commercial, public and institutional heavy duty diesel vehicles that are designed to operate on public streets and highways, whether or not the vehicles are operated on public roadways. It applies to a passenger load/unload location owner or operator and to the owner/operator of a heavy duty diesel vehicle, and limits idling to no more than five (5) minutes in any sixty (60)-minute period except as noted in Subsection (3)(C) of the rule.

10 CSR 10-5.520 *Control of Volatile Organic Compound Emissions from Existing Major Sources*

This rule does not apply because Interstate Brands is not a major source.

10 CSR 10-5.570 *Control of Sulfur Emissions from Stationary Boilers*

This rule does not apply because Interstate Brands is not a major source.

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

- 1) This "process weight rule" is not applicable to emission units EP003, EP004, EP008, EP009 or EP012 through EP019 because the permittee uses natural gas to operate its boilers and space heaters.

(Process weight is defined as the total weight of all materials introduced into an emission unit, which may cause any emission of particulate matter, *excluding* liquids and gases used solely as fuels).

- 2) Section 6.400(1)(B)(12) provides, “The provisions of this rule shall not apply to emission units that at maximum design capacity have a potential to emit less than one-half (0.5) pounds per hour of particulate matter.” The Silos, Bins, Mixers, and Transfer Equipment all emit less than 0.5 pounds per hour of particulate matter when operating uncontrolled at maximum design capacity. Therefore, this rule is not applicable.

Table #SB2: 10 CSR 10-6.400 (1)(B)(12) Compliance Demonstration (less than 0.5 lb/hr requirement)

Equipment Description	Maximum Hourly Design Rate (tons/hr)	PM ₁₀ Emission Factor Uncontrolled (lbs/ton) ¹	PM ₁₀ Emission Rate Uncontrolled (lbs/hr)
(2) Cake Flour Silos	15	0.00780	0.177
(5) Bread/Bun Flour Silos	15	0.00780	0.177
(3) Sugar Silos	25	0.00780	0.195
Sugar Transfer	6	0.00780	0.0468
Sugar Cocoa Transfer	6	0.00780	0.0468

¹Emission factor for storage bin vents at grain elevator, AP-42, Table 9.9.1-1, 1995 Ed., Rev. 3/2003.

- 1) No person shall cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases. Table #SB4 shows that the emission units in the table above comply with 10 CSR 10-6.400(3)(A)4. Since the uncontrolled emission rate for EU0180 through EU0210 is less than 0.3 grain/scf, no monitoring requirements were added to the permit.

Table #SB3 10 CSR 10-6.400(3)(A)4 Compliance Demonstration (grains per cubic foot requirement)

Emission Point	Controlled Emissions (lb/hr)	Flow Rate (SCFM)	Potential Emission Rate (grain/scf)
EP001	0.0117	1500	0.00091
EP002	0.0117	1500	0.00091
EP005	0.0195	1500	0.00152
EP006	0.00468	500	0.00109
EP007	0.00468	3000	0.00018

Example Calculation for EU0180:

$$Potential\ Emission\ (grain/scf): \frac{(0.0117\ lb/hr * 7,000\ grains/lb)}{(1500\ scf/min * 60\ min/hr)} = 0.00091\ grain/scf$$

Previous Operating Permit Condition regarding Ink Jet Label Printers

In the 1996 Permit Application, Condition #1 specifically states “VOC Emissions from the bakery ovens which bake yeast leavened products will remain below 95 tons of VOC per year.” Subsequently, the permittee requested a 1.5 tons of VOC per year for Label Printers, in order to remain below a 100 tons of VOC level (95 + 1.5). From the Condition #1 statement, the 95-ton limit was meant to cover VOC emissions from BAKING only. Therefore, the company needed to request the additional 1.5 tons of VOC per year for Label Printing since it is not associated with the baking equipment.

This wording was maintained in the 2001 and 2006 Permit Applications.

This permit combines all VOC emission under the 100-ton limit, the separate permit condition for label ink jet printers would not be necessary.

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 which 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).

Prepared by:

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