



**Missouri Department of Natural Resources**  
**Air Pollution Control Program**

## **PART 70**

# **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.

**Operating Permit Number:** OP2012-041  
**Expiration Date:** OCT 02 2017  
**Installation ID:** 143-0015  
**Project Number:** 2011-03-001

**Installation Name and Address**

SRG Global - Portageville  
101 Meatte Street  
Portageville, MO 63873  
New Madrid County

**Parent Company's Name and Address**

SRGGI  
23751 Amber Avenue  
Warren, MI 48089

**Installation Description:**

SRG Global – Portageville produces molded plastic parts for the automotive and appliance industries. Plastic pellets are heated prior to high pressure injection molding. The molded parts are then painted or electroplated prior to shipping. The installation is a major source of Particulate Matter  $\leq$  Ten Microns (PM<sub>10</sub>) and Volatile Organic Compounds (VOCs). The installation is a synthetic minor source of Hazardous Air Pollutants (HAPs).

OCT 03 2012

Effective Date

Director or Designee  
Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

SRG Global – Portageville produces molded plastic parts for the automotive and appliance industries. Plastic pellets are heated prior to high pressure injection molding. The molded parts are then painted or electroplated prior to shipping. The installation is a major source of PM<sub>10</sub> and VOCs. The installation is a synthetic minor source of HAPs.

<b>Reported Air Pollutant Emissions, tons per year</b>					
<b>Pollutants</b>	<b>2011</b>	<b>2010</b>	<b>2009</b>	<b>2008</b>	<b>2007</b>
Carbon Monoxide (CO)	0.70	0.68	0.71	0.65	0.76
Ammonia (NH <sub>3</sub> )	0.08	0.07	0.08	0.07	0.08
Nitrogen Oxides (NO <sub>x</sub> )	7.74	8.14	5.97	4.44	3.65
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )	0.17	0.26	0.26	0.30	0.45
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )	0.06	0.06	0.06	0.06	0.07
Sulfur Oxides (SO <sub>x</sub> )	0.03	0.04	0.03	0.02	0.02
Volatile Organic Compounds (VOC)	32.99	63.24	60.74	74.68	120.27
Hazardous Air Pollutants (HAPs)	1.35	3.47	2.37	7.00	10.75
Methyl Isobutyl Ketone (108-10-1)	0.37	0.35	0.82	1.86	2.01
Xylene (1330-20-7)	0.33	1.75	0.63	2.11	4.07
Ethylbenzene (100-41-4)	0.32	0.75	0.47	1.27	2.11
Formaldehyde (50-00-0)	0.23	0.23	0.23	0.23	0.23
Toluene (108-88-3)	0.10	0.37	0.19	1.41	2.29
1,6-Diisocyanatohexane (822-06-0)	0.01	0.02	0.02	-	-
Methanol (67-56-1)	-	-	0.02	0.07	0.03
Isopropylbenzene (98-82-8)	-	-	-	0.05	-

### EMISSION UNITS WITH LIMITATIONS

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

<b>Emission Unit</b>	<b>Description</b>
6	Boiler #4
7	Electroplating
20	(4) Drying Ovens
27	Emergency Diesel Fire Pump
28	Water Sprinkler System Boiler
32A	(10) Air Makeup Units
32B	(30) Space Heaters
3A	Existing Coating Operations
3B	New Coating Operations

**EMISSION UNITS WITHOUT LIMITATIONS**

The following list provides a description of the equipment that does not have emission unit-specific limitations at the time of permit issuance. These emission units are still subject to plantwide emission limitations.

Emission Unit	Description
8	(4) Scrubbers for Electroplating emissions of NO <sub>x</sub> , Methanol, Formaldehyde, and Sodium Hydroxide
9	HCl Storage Tank
10	Sulfuric Acid Storage Tank
11	Formaldehyde Storage
21	Waste Water Treatment Filter Press
31	Injection Molding
33	LPG Storage Tank
34	Diesel Storage Tank
13A	Rack Stripping Machine
13B	Scrubber
23A	Nitric Acid Storage Tank
23B	Nitric Acid Storage Tank
	(4) Plastic Storage Silos
	Plastic Grinding Operations
	Waste Treatment Operations
	Plating Solution Tanks
	(2) Sodium Hydroxide Tanks

## 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.

<p style="text-align: center;"><b>PERMIT CONDITION PW001</b> 10 CSR 10-6.065(2)(C) Voluntary Limitation(s)</p>
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**Emission Limitation:**

The permittee shall emit less than ten tons individually and 25 tons combined of HAPs from the entire installation in any consecutive 12-month period.

**Monitoring/Recordkeeping:**

1. The permittee shall use Attachments B, C, D, E, and F or other Air Pollution Control Program approved forms to demonstrate compliance each month.
2. The permittee shall retain Material Safety Data Sheets (MSDS) for every HAP containing material used at the installation.
3. The permittee shall not report negative usage values.
4. The permittee shall retain all records required by this permit for not less than five years and shall make them available immediately to Missouri Department of Natural Resources' personnel upon request.
5. Records may be retained in paper or electronic format.

**Reporting:**

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which records indicate an exceedance of the HAP limitations.
2. The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

### 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.

<b>PERMIT CONDITION 001</b>	
10 CSR 10-6.060 Construction Permits Required Construction Permit 1298-009, November 12, 1998	
<b>Emission Unit</b>	<b>Description</b>
EP-3B	New Coating Operations: Paint Booths 40 - 43

**Emission Limitation:**

Special Condition 1: The permittee shall not discharge into the atmosphere from EP-3B Paint Booths 40 – 43 VOCs in excess of 40 tons in any consecutive 12-month period.

**Operational Limitation:**

Special Condition 6: The permittee shall provide and maintain suitable, easily read, permanent markings on each of the paint booths. These markings shall consist of the equipment’s serial number, or company assigned equipment number (company assigned equipment identification numbers shall be unique to the installation).

**Monitoring/Recordkeeping:**

1. Special Condition 3: Records of monthly and annual VOC emissions shall be retained on-site for the most recent 60 months using Attachment A or another Air Pollution Control Program approved form. These records shall be made available immediately to Missouri Department of Natural Resources’ personnel upon request.
2. The permittee shall retain MSDS for each material used within the paint booths to document the VOC content.
3. The permittee shall not report negative usage values.
4. Records may be retained in paper or electronic format.

**Reporting:**

1. Special Condition 5.A: The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which records indicate an exceedance of the VOC emission limitation.
2. The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 002</b>	
10 CSR 10-3.060 Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating <sup>1</sup>	
<b>Emission Unit</b>	<b>Description</b>
EP-6	Boiler #4
EP-20	(4) Drying Ovens
EP-28	Water Sprinkler System Boiler
EP-32A	(10) Air Makeup Units
EP-32B	(30) Space Heaters

<sup>1</sup>This requirement is federally enforceable only.

**Emission Limitation:**

The permittee shall not emit particulate matter in excess of 0.27 lb/MMBtu from these new indirect heating sources. [10 CSR 10-3.060(5)(B)]

**Operational Limitation:**

The permittee shall calibrate, maintain and operate the emission units according to the manufacturer’s specifications and recommendations.

**Monitoring/Recordkeeping:**

1. Attachment G contains calculations which demonstrate that these emission units will never exceed the emission limitation while combusting natural gas.
2. Records may be kept in either written or electronic form.
3. These records shall be made available immediately for inspection to Department of Natural Resources’ personnel upon request.
4. All records shall be maintained for five years.

**Reporting:**

The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 003</b>		
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		
<b>Emission Unit</b>	<b>Description</b>	<b>Fuel</b>
EP-6	Boiler #4	Natural Gas

**Recordkeeping:**

1. Except as provided under §60.48c(g)(2) and (3), the permittee shall record and maintain records of the amount of each fuel combusted during each operating day. [§60.48c(g)(1)]
2. As an alternative to meeting the requirements of §60.48c(g)(1), the permittee may elect to record and maintain records of the amount of each fuel combusted during each calendar month. [§60.48c(g)(2)]

3. As an alternative to meeting the requirements of §60.48c(g)(1), the permittee may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month. [§60.48c(g)(3)]
4. Records may be kept in either written or electronic form.
5. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
6. All records shall be retained for five years.

**Reporting:**

1. The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30<sup>th</sup> day following the end of the reporting period. [§60.48c(j)]
2. The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 004</b>	
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart N – National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks	
Emission Unit	Description
EP-7	Chromium Electroplating

**Applicability:**

Process tanks associated with a chromium electroplating or chromium anodizing process, but in which neither chromium electroplating nor chromium anodizing is taking place, are not subject to the provisions of this subpart. Examples of such tanks include, but are not limited to, rinse tanks, etching tanks, and cleaning tanks. Likewise, tanks that contain a chromium solution, but in which no electrolytic process occurs, are not subject to this subpart. An example of such a tank is a chrome conversion coating tank where no electrical current is applied. [§63.340(c)]

**Definitions and Nomenclature:**

For definitions and nomenclature refer to §63.341.

**Standards:**

1. The emission limitations in §63.342 apply during tank operation as defined in §63.341, and during periods of startup and shutdown as these are routine occurrences. The emission limitations do not apply during periods of malfunction, but the work practice standards that address operation and maintenance and that are required by §63.342(f) shall be followed during malfunctions. [§63.342(b)(1)]
2. *Standards for decorative chromium electroplating tanks using a chromic acid bath and chromium anodizing tanks.* The permittee shall control chromium emissions discharged to the atmosphere from that affected source by either: [§63.342(d)]
  - a) Not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.01 mg/dscm ( $4.4 \times 10^{-6}$  gr/dscf); or [§63.342(d)(1)]
  - b) If a chemical fume suppressant containing a wetting agent is used, by not allowing the surface tension of the electroplating or anodizing bath contained within the affected source to exceed 45

dynes/cm ( $3.1 \times 10^{-3}$  lb<sub>f</sub>/ft) as measured by a stalagmometer or 35 dynes/cm ( $2.4 \times 10^{-3}$  lb<sub>f</sub>/ft) as measured by a tensiometer at any time during operation of the tank. [§63.342(d)(2)]

3. *Operation and maintenance practices.* The permittee is subject to these operation and maintenance practices: [§63.342(f)]
- a) At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices. [§63.342(f)(1)(i)]
  - b) Malfunctions shall be corrected as soon as practicable after their occurrence. [§63.342(f)(1)(ii)]
  - c) Operation and maintenance requirements established pursuant to §112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards. [§63.342(f)(1)(iii)]
  - d) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the source. [§63.342(f)(2)(i)]
  - e) Based on the results of a determination made under §63.342(f)(2)(i), the Administrator may require that the permittee make changes to the operation and maintenance plan required by §63.342(f)(3) for that source. Revisions may be required if the Administrator finds that the plan: [§63.342(f)(2)(ii)]
    - i) Does not address a malfunction that has occurred; [§63.342(f)(2)(ii)(A)]
    - ii) Fails to provide for the proper operation of the affected source, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or [§63.342(f)(2)(ii)(B)]
    - iii) Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable. [§63.342(f)(2)(ii)(C)]
  - f) *Operation and maintenance plan.* [§63.342(f)(3)]
    - i) The permittee shall prepare an operation and maintenance plan. The plan has been incorporated by reference into this Title V permit. The permittee is required to submit their operation and maintenance plan when renewing this Title V permit. [§63.342(f)(3)(i)]
    - ii) If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunction events, and a program for corrective action for such events. [§63.342(f)(3)(ii)]
    - iii) Recordkeeping associated with the operation and maintenance plan is identified in §63.346(b). Reporting associated with the operation and maintenance plan is identified in §63.347(g) and (h) and §63.342(f)(3)(iv). [§63.342(f)(3)(iii)]
    - iv) If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan required by §63.342(f)(3)(i), the permittee shall record the actions taken for that event and shall report by phone such actions within two working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the Administrator. [§63.342(f)(3)(iv)]

- v) The permittee shall retain the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Administrator for the life of the affected source or until the source is no longer subject to the provisions of this subpart. In addition, if the operation and maintenance plan is revised, the permittee shall retain previous (i.e., superseded) versions of the operation and maintenance plan on record to be made available for inspection, upon request, by the Administrator for a period of five years after each revision to the plan. [§63.342(f)(3)(v)]
  - vi) To satisfy the requirements of §63.342(f)(3), the permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans, provided the alternative plans meet the requirements of this section. [§63.342(f)(3)(vi)]
4. The standards in this section that apply to chromic acid baths shall not be met by using a reducing agent to change the form of chromium from hexavalent to trivalent. [§63.342(g)]

**Compliance Provisions:**

1. *Monitoring to demonstrate continuous compliance.* The permittee shall conduct monitoring according to the type of air pollution control technique that is used to comply with the emission limitation. The monitoring required to demonstrate continuous compliance with the emission limitations is identified in this section for the air pollution control techniques expected to be used by the permittee. [§63.343(c)]
- a) *Composite mesh-pad systems.* [§63.343(c)(1)]
    - i) During the initial performance test, the permittee shall determine the outlet chromium concentration using the test methods and procedures in §63.344(c), and shall establish as a site-specific operating parameter the pressure drop across the system, setting the value that corresponds to compliance with the applicable emission limitation, using the procedures in §63.344(d)(5). The permittee may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliant value the average pressure drop measured over the three test runs of one performance test and accept  $\pm$  two inches of water column from this value as the compliant range. [§63.343(c)(1)(i)]
    - ii) The permittee shall monitor and record the pressure drop across the composite mesh-pad system once each day that any affected source is operating. To be in compliance with the standards, the composite mesh-pad system shall be operated within  $\pm$  two inches of water column of the pressure drop value established during the initial performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests. [§63.343(c)(1)(ii)]
    - iii) The permittee may repeat the performance test and establish as a new site-specific operating parameter the pressure drop across the composite mesh-pad system according to the requirements in §63.343(c)(1)(i) or (ii). To establish a new site-specific operating parameter for pressure drop, the permittee shall satisfy the following requirements: [§63.343(c)(1)(iii)]
      - (1) Determine the outlet chromium concentration using the test methods and procedures in §63.344(c); [§63.343(c)(1)(iii)(A)]
      - (2) Establish the site-specific operating parameter value using the procedures §63.344(d)(5); [§63.343(c)(1)(iii)(B)]
      - (3) Satisfy the recordkeeping requirements in §63.346(b)(6) through (8); and [§63.343(c)(1)(iii)(C)]
      - (4) Satisfy the reporting requirements in §63.347(d) and (f). [§63.343(c)(1)(iii)(D)]

- iv) The requirement to operate a composite mesh-pad system within the range of pressure drop values established under §63.343(c)(1)(i) through (iii) does not apply during automatic washdown cycles of the composite mesh-pad system. [§63.343(c)(1)(iv)]
- b) *Packed-bed scrubber systems.* [§63.343(c)(2)]
  - i) During the initial performance test, the permittee shall determine the outlet chromium concentration using the procedures in §63.344(c), and shall establish as site-specific operating parameters the pressure drop across the system and the velocity pressure at the common inlet of the control device, setting the value that corresponds to compliance with the applicable emission limitation using the procedures in §63.344(d)(4) and (5). The permittee may conduct multiple performance tests to establish a range of compliant operating parameter values. Alternatively, the permittee may set as the compliant value the average pressure drop and inlet velocity pressure measured over the three test runs of one performance test, and accept  $\pm$  one inch of water column from the pressure drop value and  $\pm$  10 percent from the velocity pressure value as the compliant range. [§63.343(c)(2)(i)]
  - ii) The permittee shall monitor and record the velocity pressure at the inlet to the packed-bed system and the pressure drop across the scrubber system once each day that any affected source is operating. To be in compliance with the standards, the scrubber system shall be operated within  $\pm$  ten percent of the velocity pressure value established during the initial performance test, and within  $\pm$  one inch of water column of the pressure drop value established during the initial performance test, or within the range of compliant operating parameter values established during multiple performance tests. [§63.343(c)(2)(ii)]
- c) *Packed-bed scrubber/composite mesh-pad system.* The permittee shall comply with the monitoring requirements for composite mesh-pad systems as identified in §63.343(c)(1). [§63.343(c)(3)]
- d) *Wetting agent-type or combination wetting agent-type/foam blanket fume suppressants.* [§63.343(c)(5)]
  - i) During the initial performance test, the permittee shall determine the outlet chromium concentration using the procedures in §63.344(c). The permittee shall establish as the site-specific operating parameter the surface tension of the bath using Method 306B of 40 CFR Part 63 Appendix A, setting the maximum value that corresponds to compliance with the applicable emission limitation. In lieu of establishing the maximum surface tension during the performance test, the permittee may accept 45 dynes/cm as measured by a stalagmometer or 35 dynes/cm as measured by a tensiometer as the maximum surface tension value that corresponds to compliance with the applicable emission limitation. [§63.343(c)(5)(i)]
  - ii) The permittee shall monitor the surface tension of the electroplating or anodizing bath. Operation of the affected source at a surface tension greater than the value established during the performance test, or greater than 45 dynes/cm as measured by a stalagmometer or 35 dynes/cm as measured by a tensiometer if the permittee is using this value in accordance with §63.343(c)(5)(i), shall constitute noncompliance with the standards. The surface tension shall be monitored according to the following schedule: [§63.343(c)(5)(ii)]
    - (1) The surface tension shall be measured once every four hours during operation of the tank with a stalagmometer or a tensiometer as specified in Method 306B of 40 CFR Part 63 Appendix A. [§63.343(c)(5)(ii)(A)]
    - (2) The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every four hours of tank operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every

- eight hours of tank operation. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. The minimum frequency of monitoring allowed is once every 40 hours of tank operation. [§63.343(c)(5)(ii)(B)]
- (3) Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every four hours shall be resumed. A subsequent decrease in frequency shall follow the schedule laid out in §63.343(c)(5)(ii)(B). For example, if monitoring is occurring once every 40 hours and an exceedance occurs, subsequent monitoring would take place once every four hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation, monitoring can occur once every eight hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation on this schedule, monitoring can occur once every 40 hours of tank operation. [§63.343(c)(5)(ii)(C)]
- iii) Once a bath solution is drained from the affected tank and a new solution added, the original monitoring schedule of once every four hours shall be resumed, with a decrease in monitoring frequency allowed following the procedures of §63.343(c)(5)(ii)(B) and (C). [§63.343(c)(5)(iii)]
- e) *Use of an alternative monitoring method.* [§63.343(c)(8)]
- i) Requests and approvals of alternative monitoring methods shall be considered in accordance with §63.8(f)(1), (3), (4), and (5). [§63.343(c)(8)(i)]
- ii) After receipt and consideration of an application for an alternative monitoring method, the Administrator may approve alternatives to any monitoring methods or procedures including, but not limited to, the following: [§63.343(c)(8)(ii)]
- (1) Alternative monitoring requirements when installation or use of the monitoring devices specified would not provide accurate measurements due to interferences caused by substances within the effluent gases; or [§63.343(c)(8)(ii)(A)]
- (2) Alternative locations for installing monitoring devices when the permittee can demonstrate that installation at alternate locations will enable accurate and representative measurements. [§63.343(c)(8)(ii)(B)]

**Performance Testing and Test Methods:**

The permittee shall refer to §63.344 for 40 CFR Part 63, Subpart N performance test requirements and test methods.

**General Provisions:**

The permittee shall refer to Table 1 to 40 CFR Part 63, Subpart N for 40 CFR Part 63, Subpart A applicability.

**Recordkeeping:**

1. The permittee shall refer to §63.346 for recordkeeping requirements specific to 40 CFR Part 63, Subpart N.
2. Records may be kept in either written or electronic form.
3. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
4. All records shall be retained for five years.

**Reporting:**

1. The permittee shall refer to §63.347 for reporting requirements specific to 40 CFR Part 63, Subpart N.
2. The permittee shall notify the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after an exceedance or a malfunction which could cause an exceedance of the emission limitations.
3. The permittee shall report any deviations from the standards, compliance provisions, performance testing, test methods, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 005</b>	
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines <sup>1</sup>	
<b>Emission Unit</b>	<b>Description</b>
EP-27	Emergency Diesel Fire Pump

<sup>1</sup>An existing stationary CI RICE located at an area source of HAP emissions must comply with the applicable emission limitations and operating limitations no later than May 3, 2013. [§63.6595(a)(1)]

**Emission and Operating Limitations:**

1. The permittee shall meet the following requirements except during periods of startup: [§63.6603(a) and 40 CFR Part 63, Subpart ZZZZ Table 2d Item 4]
  - a) Change oil and filter every 500 hours of operation or annually, whichever comes first;
  - b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and
  - c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
2. If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of 40 CFR Part 63, Subpart ZZZZ, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. The permittee shall report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable. [40 CFR Part 63, Subpart ZZZZ Table 2d Footnote 2]

**General Compliance:**

1. The permittee shall be in compliance with the emission limitations and operating limitations that apply at all times. [§63.6605(a)]
2. At all times the permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may

include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.6605(b)]

**Initial Compliance:**

1. The permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6625(e)]
2. The permittee shall install a non-resettable hour meter if one is not already installed. [§63.6625(f)]
3. The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [§63.6625(h)]
4. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in Table 2d of 40 CFR Part 63, Subpart ZZZZ. The oil analysis shall be performed at the same frequency specified for changing the oil in Table 2d of 40 CFR Part 63, Subpart ZZZZ. The analysis program shall at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee shall change the oil within two days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee shall change the oil within two days or before commencing operation, whichever is later. The permittee shall retain records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program shall be part of the maintenance plan for the engine. [§63.6625(i)]

**Continuous Compliance:**

1. The permittee shall demonstrate continuous compliance with each emission limitation and operating limitation in Table 2d of 40 CFR Part 63, Subpart ZZZZ that apply by: [§63.6640(a)]
  - a) Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or [40 CFR Part 63, Subpart ZZZZ Table 6 Item 9.a.i]
  - b) Develop and follow a maintenance plan which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR Part 63, Subpart ZZZZ Table 6 Item 9.a.ii]
2. The permittee shall report each instance in which the permittee did not meet each emission limitation or operating limitation in Table 2d of 40 CFR Part 63, Subpart ZZZZ that applies. These instances are deviations from the emission and operating limitations. These deviations shall be reported according to the requirements in §63.6650. [§63.6640(a)]
3. The permittee shall also report each instance in which the permittee did not meet the requirements in Table 8 of 40 CFR Part 63, Subpart ZZZZ that apply. [§63.6640(e)]
4. *Requirements for emergency stationary RICE.* [§63.6640(f)]
  - a) The permittee shall operate the emergency stationary RICE according to the requirements in §63.6640(f)(1)(i) through (iii). Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in §63.6640(f)(1)(i) through (iii), is prohibited. If the permittee does not operate the engine

according to the requirements in §63.6640(f)(1)(i) through (iii), the engine will not be considered an emergency engine and will need to meet all requirements for non-emergency engines.

[§63.6640(f)(1)]

- i) There is no time limit on the use of emergency stationary RICE in emergency situations.  
[§63.6640(f)(1)(i)]
- ii) The permittee may operate the emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee retains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year. [§63.6640(f)(1)(ii)]
- iii) The permittee may operate the emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that the permittee may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by §63.6640(f)(1)(iii), as long as the power provided by the financial arrangement is limited to emergency power.  
[§63.6640(f)(1)(iii)]

**General Provisions:**

The permittee shall refer to Table 8 to 40 CFR Part 63, Subpart ZZZZ for 40 CFR Part 63, Subpart A applicability.

**Notifications:**

The permittee shall submit all of the notifications in §§63.7(b) and (c), §63.8(e), (f)(4) and (f)(6), §63.9(b) through (e), (g), and (h) that apply by the dates specified. [§63.6645(a)]

**Recordkeeping:**

1. The permittee shall retain the following records: [§63.6655(a)]
  - a) A copy of each notification and report that the permittee submitted to comply. [§63.6655(a)(1)]
  - b) Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment. [§63.6655(a)(2)]
  - c) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air

pollution control and monitoring equipment to its normal or usual manner of operation.  
[§63.6655(a)(5)]

- d) Records required in Table 6 of 40 CFR Part 63, Subpart ZZZZ to show continuous compliance with each emission or operating limitation that applies. [§63.6655(d)]
  - e) Records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to a maintenance plan. [§63.6655(e)]
  - f) Records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the permittee shall retain records of the notification of the emergency situation, and the time the engine was operated as part of demand response. [§63.6655(f)]
2. Records shall be in a form suitable and readily available for expeditious review according to §63.10(b)(1). [§63.6660(a)]
  3. As specified in §63.10(b)(1), the permittee shall retain each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.6660(b)]
  4. The permittee shall retain each record readily accessible in hard copy or electronic form for at least five years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). [§63.6660(c)]
  5. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.

**Reporting:**

1. The permittee shall submit submit a compliance report containing: [§63.6650(a)]
  - a) Company name and address. [§63.6650(c)(1)]
  - b) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report. [§63.6650(c)(2)]
  - c) Date of report and beginning and ending dates of the reporting period. [§63.6650(c)(3)]
  - d) If the permittee had a malfunction during the reporting period, the compliance report shall include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report shall also include a description of actions taken by the permittee during the malfunction to minimize emissions in accordance with §63.6605(b), including actions taken to correct a malfunction. [§63.6650(c)(4)]
  - e) If there are no deviations from any emission or operating limitations that apply, a statement that there were no deviations from the emission or operating limitations during the reporting period. [§63.6650(c)(5)]
  - f) If the permittee had a deviation from any emission limitation or operating limitation during the reporting period, the following information: [40 CFR Part 63, Subpart ZZZZ Table 7 Item 7.1.b]
    - i) The total operating time of the stationary RICE at which the deviation occurred during the reporting period. [§63.6650(d)(1)]
    - ii) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [§63.6650(d)(2)]
2. The first compliance report shall cover the period beginning on May 3, 2013 and ending on June 30<sup>th</sup>. [§63.6650(b)(1)]

3. Each subsequent compliance report shall cover the semi-annual reporting period from January 1<sup>st</sup> through June 30<sup>th</sup> or the semi-annual reporting period from July 1<sup>st</sup> through December 31<sup>st</sup>.  
 [§63.6650(b)(3)]
4. The permittee shall submit the first and subsequent compliance reports as part of the semi-annual monitoring report required by this Title V operating permit. [§63.6650(b)(5)]
5. The permittee shall report any deviations from the emission and operating limitations, general compliance, initial compliance, continuous compliance, general provisions, notifications, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 006</b>	
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations	
40 CFR Part 63, Subpart WWWW – National Emission Standards for Hazardous Air Pollutants:	
Area Source Standards for Plating and Polishing Operations	
Emission Unit	Description
EP-7	Nickel Electroplating

**Applicability:**

1. This permit condition applies to each of the following affected sources, at all times: [§63.11505(a)]
  - a) Each tank that contains one or more of the plating and polishing metal HAP, as defined in §63.11511 and is used for non-chromium electroplating; electroforming; electropolishing; electroless plating or other non-electrolytic metal coating operations, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating. [§63.11505(a)(1)]
2. This permit condition does not apply to any of the following process units or operations: [§63.11505(d)]
  - a) Process units that are subject to the requirements of 40 CFR Part 63, Subpart N. [§63.11505(d)(1)]
  - b) Plating, polishing, coating, or thermal spraying conducted to repair surfaces or equipment. [§63.11505(d)(4)]
  - c) Any plating or polishing process that uses process materials that contain cadmium, chromium, lead, or nickel (as the metal) in amounts less than 0.1 percent by weight, or that contain manganese in amounts less than 1.0 percent by weight (as the metal), as used. Information used to determine the amount of plating and polishing metal HAP in materials used in the plating or polishing process may include information reported on the Material Safety Data Sheet for the material, but is not required. For plating or polishing tanks, the HAP content may be determined from the final bath contents “as used” to plate or to polish. [§63.11505(d)(6)]

**Definitions:**

The permittee shall refer to §63.11511 for definitions of certain terms used within this permit condition.

**Standards and Management Practices:**

1. For each non-cyanide electroplating, electroforming, or electropolishing tank (hereafter referred to as an “electrolytic” process tank, as defined in §63.11511) that contains one or more of the plating and polishing metal HAP and operates at a pH of less than 12, the permittee shall comply with the applicable management practices in §63.11507(g), as practicable, and one of the following requirements: [§63.11507(a)]

- a) The permittee shall use a wetting agent/fume suppressant in the bath of the affected tank, as defined in §63.11511 and according to the following requirements: [§63.11507(a)(1)]
    - i) The permittee shall initially add the wetting agent/fume suppressant in the amounts recommended by the manufacturer for the specific type of electrolytic process. [§63.11507(a)(1)(i)]
    - ii) The permittee shall add wetting agent/fume suppressant in proportion to the other bath chemistry ingredients that are added to replenish the bath, as in the original make-up of the bath, or in proportions such that the bath contents are returned to that of the original make-up of the bath. [§63.11507(a)(1)(ii)]
    - iii) If a wetting agent/fume suppressant is included in the electrolytic process bath chemicals used in the affected tank according to the manufacturer's instructions, it is not necessary to add additional wetting agent/fume suppressants to the tank to comply with this rule. [§63.11507(a)(1)(iii)]
  - b) The permittee shall capture and exhaust emissions from the affected tank to any one of the following emission control devices: composite mesh pad, packed bed scrubber, or mesh pad mist eliminator, according to the following requirements: [§63.11507(a)(2)]
    - i) The permittee shall operate all capture and control devices according to the manufacturer's specifications and operating instructions. [§63.11507(a)(2)(i)]
    - ii) The permittee shall retain the manufacturer's specifications and operating instructions at the facility at all times in a location where they can be easily accessed by the operators. [§63.11507(a)(2)(ii)]
  - c) The permittee shall cover the tank surface according to the following requirements: [§63.11507(a)(3)]
    - i) For batch electrolytic process tanks, as defined in §63.11511, the permittee shall use a tank cover, as defined in §63.11511, over all of the effective surface area of the tank for at least 95 percent of the electrolytic process operating time. [§63.11507(a)(3)(i)]
    - ii) For continuous electrolytic process tanks, as defined in §63.11511, the permittee shall cover at least 75 percent of the surface of the tank, as defined in §63.11511, whenever the electrolytic process tank is in operation. [§63.11507(a)(3)(ii)]
2. For each "flash" or short-term electroplating tank, as defined in §63.11511 that uses or emits one or more of the plating and polishing metal HAP, the permittee shall comply with the applicable management practices in §63.11507(g), as practicable, and the following requirements: [§63.11507(b)]
    - a) The permittee shall limit short-term or "flash" electroplating to no more than one cumulative hour per day or three cumulative minutes per hour of plating time. [§63.11507(b)(1)]
    - b) The permittee shall use a tank cover, as defined in §63.11511, for at least 95 percent of the plating time. [§63.11507(b)(2)]
  3. For each process tank that is used both for short-term electroplating and for electrolytic processing of longer duration (i.e., processing that does not meet the definition of short-term or flash electroplating) and contains one or more of the plating and polishing metal HAP, the permittee shall meet the requirements specified in §63.11507(a) or (b), whichever apply to the process operation, and implement the applicable management practices in §63.11507(g), as practicable. [§63.11507(c)]
  4. For each plating and polishing process unit that contains, applies, or emits one or more of the plating and polishing metal HAP, the permittee shall implement the following applicable management practices, as practicable: [§63.11507(g)]
    - a) Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements. [§63.11507(g)(1)]

- b) Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable. [§63.11507(g)(2)]
- c) Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable. [§63.11507(g)(3)]
- d) Use tank covers, if already owned and available at the facility, whenever practicable. [§63.11507(g)(4)]
- e) Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality). [§63.11507(g)(5)]
- f) Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable. [§63.11507(g)(6)]
- g) Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable. [§63.11507(g)(7)]
- h) Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable. [§63.11507(g)(8)]
- i) Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable. [§63.11507(g)(9)]
- j) Minimize spills and overflow of tanks, as practicable. [§63.11507(g)(10)]
- k) Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable. [§63.11507(g)(11)]
- l) Perform regular inspections to identify leaks and other opportunities for pollution prevention. [§63.11507(g)(12)]

**Compliance:**

1. The permittee shall submit a Notification of Compliance Status in accordance with §63.11509(b). [§63.11508(a)]
2. The permittee shall be in compliance with the applicable management practices and equipment standards at all times. [§63.11508(b)]
3. To demonstrate initial compliance, the permittee shall satisfy the following requirements: [§63.11508(c)]
  - a) For each electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a) which uses a wetting agent/fume suppressant to comply with this subpart, the permittee shall demonstrate initial compliance according to the following: [§63.11508(c)(1)]
    - i) The permittee shall add wetting agent/fume suppressant to the bath of each affected tank according to manufacturer's specifications and instructions. [§63.11508(c)(1)(i)]
    - ii) The permittee shall state in the Notification of Compliance Status that the permittee adds wetting agent/fume suppressant to the bath according to manufacturer's specifications and instructions. [§63.11508(c)(1)(ii)]
    - iii) The permittee shall implement the applicable management practices specified in §63.11507(g), as practicable. [§63.11508(c)(1)(iii)]
    - iv) The permittee shall state in the Notification of Compliance Status that the permittee has implemented the applicable management practices specified in §63.11507(g), as practicable. [§63.11508(c)(1)(iv)]
  - b) For each electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a) which uses a

- control system, as defined in §63.11511 to comply with this subpart, the permittee shall demonstrate initial compliance according to the following: [§63.11508(c)(2)]
- i) The permittee shall install a control system designed to capture emissions from the affected tank and exhaust them to a composite mesh pad, packed bed scrubber, or mesh pad mist eliminator. [§63.11508(c)(2)(i)]
  - ii) The permittee shall state in the Notification of Compliance Status that the permittee has installed the control system according to the manufacturer's specifications and instructions. [§63.11508(c)(2)(ii)]
  - iii) The permittee shall implement the applicable management practices specified in §63.11507(g), as practicable. [§63.11508(c)(2)(iii)]
  - iv) The permittee shall state in the Notification of Compliance Status that the permittee has implemented the applicable management practices specified in §63.11507(g), as practicable. [§63.11508(c)(2)(iv)]
  - v) The permittee shall follow the manufacturer's specifications and operating instructions for the control systems at all times. [§63.11508(c)(2)(v)]
- c) For each batch electrolytic process tank, as defined in §63.11511 that contains one or more of the plating and polishing metal HAP and which is subject to the requirements in §63.11507(a) and which uses a tank cover, as defined in §63.11511, to comply with §63.11507(a), (b), or (c), the permittee shall demonstrate initial compliance according to the following: [§63.11508(c)(3)]
- i) The permittee shall install a tank cover on the affected tank. [§63.11508(c)(3)(i)]
  - ii) The permittee shall state in the Notification of Compliance Status that the permittee operates the tank with the cover in place at least 95 percent of the electrolytic process operating time. [§63.11508(c)(3)(ii)]
  - iii) The permittee shall implement the applicable management practices specified in §63.11507(g), as practicable. [§63.11508(c)(3)(iii)]
  - iv) The permittee shall state in the Notification of Compliance Status that the permittee has implemented the applicable management practices specified in §63.11507(g), as practicable. [§63.11508(c)(3)(iv)]
- d) For each continuous electrolytic process tank, as defined in §63.11511 that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a) which the permittee covers the tank surface to comply with §63.11507(a), (b), or (c), the permittee shall demonstrate initial compliance according to the following: [§63.11508(c)(4)]
- i) The permittee shall cover at least 75 percent of the surface area of the affected tank. [§63.11508(c)(4)(i)]
  - ii) The permittee shall state in the Notification of Compliance Status that the permittee operates the tank with the surface cover in place whenever the continuous electrolytic process is in operation. [§63.11508(c)(4)(ii)]
  - iii) The permittee shall implement the applicable management practices specified in §63.11507(g), as practicable. [§63.11508(c)(4)(iii)]
  - iv) The permittee shall state in the Notification of Compliance Status that the permittee has implemented the applicable management practices specified in §63.11507(g), as practicable. [§63.11508(c)(4)(iv)]
- e) For each flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(b) and which complies with §63.11507(a), (b) or (c) by limiting the plating time of the affected tank, the permittee shall demonstrate initial compliance according to the following: [§63.11508(c)(5)]

- i) The permittee shall state in the Notification of Compliance Status that the permittee limits short-term or flash electroplating to no more than one cumulative hour per day, or three cumulative minutes per hour of plating time. [§63.11508(c)(5)(i)]
- ii) The permittee shall implement the applicable management practices specified in §63.11507(g), as practicable. [§63.11508(c)(5)(ii)]
- iii) The permittee shall state in the Notification of Compliance Status that the permittee has implemented the applicable management practices specified in §63.11507(g), as practicable. [§63.11508(c)(5)(iii)]
- f) For each flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(b), and which complies with §63.11507(a), (b), or (c) by operating the affected tank with a cover, the permittee shall demonstrate initial compliance according to the following: [§63.11508(c)(6)]
  - i) The permittee shall install a tank cover on the affected tank. [§63.11508(c)(6)(i)]
  - ii) The permittee shall state in the Notification of Compliance Status that the permittee operates the tank with the cover in place at least 95 percent of the plating time. [§63.11508(c)(6)(ii)]
  - iii) The permittee shall implement the applicable management practices specified in §63.11507(g), as practicable. [§63.11508(c)(6)(iii)]
  - iv) The permittee shall state in the Notification of Compliance Status that the permittee has implemented the applicable management practices specified in §63.11507(g), as practicable. [§63.11508(c)(6)(iv)]
4. To demonstrate continuous compliance with the applicable management practices and equipment standards, the permittee satisfy the following requirements: [§63.11508(d)]
  - a) The permittee shall always operate and maintain the affected source, including air pollution control equipment. [§63.11508(d)(1)]
  - b) The permittee shall prepare an annual compliance certification according to the requirements specified in §63.11509(c), and keep it in a readily-accessible location for inspector review. [§63.11508(d)(2)]
  - c) For each electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), which uses a wetting agent/fume suppressant to comply with this subpart, the permittee shall demonstrate continuous compliance according to the following: [§63.11508(d)(3)]
    - i) The permittee shall record that the permittee has added the wetting agent/fume suppressant to the tank bath in the original make-up of the tank. [§63.11508(d)(3)(i)]
    - ii) For tanks where the wetting agent/fume suppressant is a separate ingredient from the other tank additives, the permittee shall demonstrate continuous compliance according to the following: [§63.11508(d)(3)(ii)]
      - (1) The permittee shall add wetting agent/fume suppressant in proportion to the other bath chemistry ingredients that are added to replenish the tank bath, as in the original make-up of the tank; or in proportion such that the bath is brought back to the original make-up of the tank. [§63.11508(d)(3)(ii)(A)]
      - (2) The permittee shall record each addition of wetting agent/fume suppressant to the tank bath. [§63.11508(d)(3)(ii)(B)]
    - iii) The permittee shall state in the annual compliance certification that you have added wetting agent/fume suppressant to the bath according to the manufacturer's specifications and instructions. [§63.11508(d)(3)(iii)]
  - d) For each electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), and which

uses a control system to comply, the permittee shall demonstrate continuous compliance according to the following: [§63.11508(d)(4)]

- i) The permittee shall operate and maintain the control system according to the manufacturer's specifications and instructions. [§63.11508(d)(4)(i)]
  - ii) Following any malfunction or failure of the capture or control devices to operate properly, the permittee shall take immediate corrective action to return the equipment to normal operation according to the manufacturer's specifications and operating instructions. [§63.11508(d)(4)(ii)]
  - iii) The permittee shall state in the annual certification that the permittee has operated and maintained the control system according to the manufacturer's specifications and instructions. [§63.11508(d)(4)(iii)]
  - iv) The permittee shall record the results of all control system inspections, deviations from proper operation, and any corrective action taken. [§63.11508(d)(4)(iv)]
  - v) The permittee shall retain the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators. [§63.11508(d)(4)(v)]
- e) For each flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(b), and which complies with §63.11507(a), (b), or (c) by limiting the plating time for the affected tank, the permittee shall demonstrate continuous compliance according to the following: [§63.11508(d)(5)]
- i) The permittee shall limit short-term or flash electroplating to no more than one cumulative hour per day or three cumulative minutes per hour of plating time. [§63.11508(d)(5)(i)]
  - ii) The permittee shall record the times that the affected tank is operated each day. [§63.11508(d)(5)(ii)]
  - iii) The permittee shall state in the annual compliance certification that the permittee has limited short-term or flash electroplating to no more than one cumulative hour per day or three cumulative minutes per hour of plating time. [§63.11508(d)(5)(iii)]
- f) For batch electrolytic process tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements of §63.11507(a), or a flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(b), and which complies with §63.11507(a), (b), or (c) by operating the affected tank with a cover, the permittee shall demonstrate continuous compliance according to the following: [§63.11508(d)(6)]
- i) The permittee shall operate the tank with the cover in place at least 95 percent of the electrolytic process operating time. [§63.11508(d)(6)(i)]
  - ii) The permittee shall record the times that the tank is operated and the times that the tank is covered on a daily basis. [§63.11508(d)(6)(ii)]
  - iii) The permittee shall state in the annual certification that the permittee has operated the tank with the cover in place at least 95 percent of the electrolytic process time. [§63.11508(d)(6)(iii)]
- g) For each continuous electrolytic process tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(a), and which complies with §63.11507(a), (b), or (c) by operating the affected tank with a cover, the permittee shall demonstrate continuous compliance according to the following: [§63.11508(d)(7)]
- i) The permittee shall operate the tank with at least 75 percent of the surface covered during all periods of electrolytic process operation. [§63.11508(d)(7)(i)]

- ii) The permittee shall state in the annual certification that the permittee has operated the tank with 75 percent of the surface covered during all periods of electrolytic process operation. [§63.11508(d)(7)(ii)]
- h) For each tank or other operation that is subject to the management practices specified in §63.11507(g), the permittee shall demonstrate continuous compliance according to the following: [§63.11508(d)(8)]
  - i) The permittee shall implement the applicable management practices during all times that the affected tank or process is in operation. [§63.11508(d)(8)(i)]
  - ii) The permittee shall state in the annual compliance certification that the permittee has implemented the applicable management practices, as practicable. [§63.11508(d)(8)(ii)]

**General Provisions:**

The permittee shall refer to Table 1 to 40 CFR Part 63, Subpart WWWW for 40 CFR Part 63, Subpart A applicability.

**Notifications, Recordkeeping, and Reporting:**

1. The permittee shall submit a Notification of Compliance Status in accordance the following: [§63.11509(b)]
  - a) The Notification of Compliance Status shall include the following items: [§63.11509(b)(2)]
    - i) List of affected sources and the plating and polishing metal HAP used in, or emitted by, those sources. [§63.11509(b)(2)(i)]
    - ii) Methods used to comply with the applicable management practices and equipment standards. [§63.11509(b)(2)(ii)]
    - iii) Description of the capture and emission control systems used to comply with the applicable equipment standards. [§63.11509(b)(2)(iii)]
    - iv) Statement by the permittee as to whether the source is in compliance with the applicable standards or other requirements. [§63.11509(b)(2)(iv)]
  - b) If a facility makes a change to any items in §63.11509(b)(2)(i), (iii), and (iv) of this section that does not result in a deviation, an amended Notification of Compliance Status should be submitted within 30 days of the change. [§63.11509(b)(3)]
2. The permittee shall prepare an annual certification of compliance report according to §63.11509(c)(1) through (7). These reports do not need to be submitted unless a deviation from the requirements of this subpart has occurred during the reporting year, in which case, the annual compliance report shall be submitted along with the deviation report. [§63.11509(c)]
  - a) For each electroplating, electroforming, or electropolishing tank that is subject to the requirements in §63.11507(a)(1), the permittee shall state in the annual compliance certification that the permittee has added wetting agent/fume suppressant to the bath according to the manufacturer's specifications and instructions. [§63.11509(c)(1)]
  - b) For each electroplating, electroforming, or electropolishing tank that is subject to the requirements in §63.11507(a), and which uses a control system to comply, the permittee shall state in the annual certification that the permittee has operated and maintained the control system according to the manufacturer's specifications and instructions. [§63.11509(c)(2)]
  - c) For each flash or short-term electroplating tank that is subject to the requirements in §63.11507(b), and which complies with §63.11507(a), (b), or (c) by limiting the plating time of the affected tank, the permittee shall state in the annual compliance certification that the permittee has limited short-term or flash electroplating to no more than one cumulative hour per day or three cumulative minutes per hour of plating time. [§63.11509(c)(3)]

- d) For each batch electrolytic process tank that is subject to the requirements of §63.11507(a) or a flash or short-term electroplating tank that is subject to the requirements in §63.11507(b), and which complies with §63.11507(a), (b), or (c) by operating the affected tank with a cover, the permittee shall state in the annual certification that the permittee has operated the tank with the cover in place at least 95 percent of the electrolytic process time. [§63.11509(c)(4)]
  - e) For each continuous electrolytic process tank that is subject to the requirements of §63.11507(a), and which complies with §63.11507(a), (b), or (c) by operating the affected tank with a cover, the permittee shall state in the annual certification that the permittee has covered at least 75 percent of the surface area of the tank during all periods of electrolytic process operation. [§63.11509(c)(5)]
  - f) For each plating and polishing operation that is subject to the management practices specified in §63.11507(g), the permittee shall state in the annual compliance certification that the permittee has implemented the applicable management practices, as practicable. [§63.11509(c)(6)]
  - g) Each annual compliance report shall be prepared no later than January 31<sup>st</sup> of the year immediately following the reporting period and retained in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance report shall be submitted along with the deviation report, and postmarked or delivered no later than January 31<sup>st</sup> of the year immediately following the reporting period. [§63.11509(c)(7)]
3. If any deviations from the compliance requirements occurred during the year, the permittee shall report the deviations, along with the corrective action taken, and submit this report to the delegated authority. [§63.11509(d)]
  4. The permittee shall retain the following records: [§63.11509(e)]
    - a) A copy of any Initial Notification and Notification of Compliance Status that the permittee has submitted and all documentation supporting those notifications. [§63.11509(e)(1)]
    - b) The records specified in §63.10(b)(2)(i) through (iii) and (xiv). [§63.11509(e)(2)]
    - c) The records required to show continuous compliance with each management practice and equipment standard that applies, as specified in §63.11508(d). [§63.11509(e)(3)]
  5. The permittee shall retain each record for a minimum of five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee shall retain each record onsite for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). The permittee may retain the records offsite for the remaining three years. [§63.11509(f)]
  6. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
  7. The permittee shall report any deviations from standards, management practices, compliance, general provisions, notification, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 007</b>		
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants and 10 CSR 10-6.065(2)(C) Voluntary Limitation(s)		
<b>Emission Unit</b>	<b>Description</b>	<b>Control Device</b>
EP-3A	Existing Coating Operations	CD12, CD19, CD20, CD21, CD22, CD24, CD25, CD27, CD28, CD29, CD30, CD31, and CD33 Fabric Filters

**Emission Limitations:**

1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission sources any visible emissions with an opacity greater than 40 percent. [10 CSR 10-6.220(3)(A)]
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 60 percent. [10 CSR 10-6.220(3)(B)]

**Operational Limitations:**

1. The permittee shall control particulate emissions from the 13 existing paint booths using fabric filters. The fabric filters shall be inspected for holes, rips, and/or tears at the beginning of each shift during which the paint booths will be used. The fabric filters shall be replaced if any holes, rips, and/or tears are found and as required by the manufacturer’s specifications. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
2. The permittee shall maintain and operate the fabric filters according to the manufacturer’s specifications and recommendations.

**Monitoring/Recordkeeping:**

1. The permittee shall maintain an operating and maintenance log for each control device using Attachment H or an equivalent form generated by the permittee. The record shall be maintained in hard copy or electronic form. The log(s) shall include the following:
  - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions;
  - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.; and
  - c) Dates and times of all bag replacements.
2. The permittee shall retain a copy of the manufacturer’s specifications.
3. Records may be kept in either written or electronic form.
4. These records shall be made available immediately for inspection to Department of Natural Resources’ personnel upon request.
5. All records shall be maintained for five years.

**Reporting:**

The permittee shall report any deviations from the emission limitations, operational limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 008</b>		
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants and 10 CSR 10-6.065(2)(C) Voluntary Limitation(s)		
<b>Emission Unit</b>	<b>Description</b>	<b>Control Device</b>
EP-03B	New Coating Operations	CD37, CD38, CD39, and CD40 Fabric Filters

**Emission Limitations:**

1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission sources any visible emissions with an opacity greater than 20 percent. [10 CSR 10-6.220(3)(A)]
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 60 percent. [10 CSR 10-6.220(3)(B)]

**Operational Limitations:**

1. The permittee shall control particulate emissions from the four new paint booths using fabric filters. The fabric filters shall be inspected for holes, rips, and/or tears at the beginning of each shift during which the paint booths will be used. The fabric filters shall be replaced if any holes, rips, and/or tears are found and as required by the manufacturer's specifications. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
2. The permittee shall maintain and operate the fabric filters according to the manufacturer's specifications and recommendations.

**Monitoring/Recordkeeping:**

1. The permittee shall maintain an operating and maintenance log for each control device using Attachment H or an equivalent form generated by the permittee. The record shall be maintained in hard copy or electronic form. The log(s) shall include the following:
  - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions;
  - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.; and
  - c) Dates and times of all bag replacements.
2. The permittee shall retain a copy of the manufacturer's specifications.
3. Records may be kept in either written or electronic form.
4. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
5. All records shall be maintained for five years.

**Reporting:**

The permittee shall report any deviations from the emission limitations, operational limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 009</b>	
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds	
<b>Emission Unit</b>	<b>Description</b>
EP-27	Emergency Diesel Fire Pump

**Emission Limitations:**

The permittee shall not emit more than 500 ppmv of SO<sub>2</sub> or more than 35 mg/m<sup>3</sup> of H<sub>2</sub>SO<sub>4</sub> or SO<sub>3</sub> or any combination of those gases averaged on any consecutive three-hour time period.

**Operational Limitation:**

These emission units shall only combust diesel fuel containing no more than 0.05 percent sulfur.

**Monitoring/Recordkeeping:**

1. The permittee shall maintain fuel purchase receipts indicating the sulfur content of the diesel fuel.
2. The permittee shall maintain records of any equipment malfunctions, using Attachment H or an equivalent form generated by the permittee.
3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
4. All records shall be maintained for five years.

**Reporting:**

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

## IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the 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. The following is only an excerpt from the regulation or code, and is provided for summary purposes only.

### **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:
  - 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.
  - b) Yard waste.
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. The permittee 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 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 the permittee fails to comply with the provisions or any condition of the open burning permit.
5. Reporting and Recordkeeping. 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 §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 §60.2245 - §60.2260, sources shall 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 listed information 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 §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 listed information 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 §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 §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(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(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(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 10-6.110 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 paper EIQ to the Air Pollution Control Program by no later than April 1<sup>st</sup> after the end of each reporting year. The permittee may instead submit a full electronic EIQ via MoEIS by no later than May 1<sup>st</sup> after the end of each reporting year.
5. Emission fees are due by no later than June 1<sup>st</sup> after the end of each reporting year. The fees shall be payable to the Missouri Department of Natural Resources.
6. The reporting period shall end on December 31<sup>st</sup> of each calendar year. Each report shall contain the required information for each emission unit for the 12-month period immediately preceding the end of the reporting period.
7. 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.

**Monitoring:**

1. The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.
  - a) The permittee shall maintain the following monitoring schedule:
  - b) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance.
  - c) Should no violation of this regulation be observed during this period then-
    - i) The permittee may observe once every two weeks for a period of eight 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.
  - d) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

**Recordkeeping:**

1. The permittee shall document all readings on Attachment I, or its equivalent, noting the following:
  - a) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
  - b) Whether equipment malfunctions contributed to an exceedance.
  - c) Any violations and any corrective actions undertaken to correct the violation.

### **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 10-6.165 Restriction of Emission of Odors**

#### **This requirement is not federally enforceable.**

The permittee may not 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 10-6.250 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 Missouri 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 Missouri Department of Natural Resources 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 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 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(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(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) October 1st for monitoring which covers the January through June time period, and
    - ii) April 1st for monitoring which covers the July through December time period.
    - iii) Exception. Monitoring requirements which require reporting more frequently than semi-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, including deviations or Part 64 exceedances.
  - 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 10 CSR 10-6.065(6)(C)7.A 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 shall 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 semi-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(6)(C)1.D Risk Management Plan Under Section 112(r)**

1. 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 §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:
  - a) June 21, 1999;
  - b) Three years after the date on which a regulated substance is first listed under §68.130; or
  - c) The date on which a regulated substance is first present above a threshold quantity in a process.

#### **10 CSR 10-6.065(6)(C)1.F Severability Clause**

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

#### **10 CSR 10-6.065(6)(C)1.G General Requirements**

1. The permittee shall 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 pursuant to 10 CSR 10-6.065(6)(C)1.

#### **10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions**

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

#### **10 CSR 10-6.065(6)(C)3 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 EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, as well as the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions 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(6)(C)6 Permit Shield**

1. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
  - a) The application requirements are included and specifically identified in this permit, or
  - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
2. Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
  - a) The provisions of §303 of the Act or §643.090, RSMo concerning emergency orders,
  - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
  - c) The applicable requirements of the acid rain program,
  - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
  - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

#### **10 CSR 10-6.065(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(6)(C)8 Operational Flexibility**

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, at least seven days in advance of these changes, except as allowed for

emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) §502(b)(10) changes. Changes that, under §502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting or compliance requirements of the permit.
  - a) Before making a change under this provision, the permittee shall provide advance written notice 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, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change.
  - b) The permit shield shall not apply to these changes.

#### **10 CSR 10-6.065(6)(C)9 Off-Permit Changes**

1. Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. 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 subject to any requirements under Title IV of the Act or is a Title I modification;
  - b) The permittee must provide written notice of the change to the Air Pollution Control Program's 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 notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. 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.
  - 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; and
  - d) The permit shield shall not apply to 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. Glenn Lowe, 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 permittee 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(6)(E)6 Reopening-Permit for Cause**

1. This permit may be reopened for cause if:
  - a) The Missouri Department of Natural Resources receives notice from the EPA that a petition for disapproval of a permit pursuant to §70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
  - b) The Missouri 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,
  - c) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
    - i) The permit has a remaining term of less than three years;
    - ii) The effective date of the requirement is later than the date on which the permit is due to expire; or
    - iii) 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,
  - d) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
  - e) 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(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 B**  
 Plantwide HAP Worksheet

<b>EP-3A and EP-3B Paint Booths</b>				
<b>Material Used (Name, Type, HAPs within)</b>	<b>Amount of Material Used (gallons)</b>	<b>Density (lb/gal)</b>	<b>HAP Content (weight percent)</b>	<b>HAP Emissions<sup>1</sup> (tons)</b>
<b>EP-6 Boiler, EP-20 Drying Ovens, EP-28 Boiler, EP-32A Air Makeup Units, and EP-32B Space Heaters</b>				
<b>Natural Gas Combustion (MMscf)</b>		<b>HAP Emission Factor<sup>2</sup> (lb/MMscf)</b>		<b>HAP Emissions<sup>3</sup> (tons)</b>
		1.888		
<b>EP-7 Electroplating</b>				
<b>Usage (Hours)</b>		<b>HAP Emission Factor<sup>4</sup> (lb/hour)</b>		<b>HAP Emissions<sup>5</sup> (tons)</b>
		0.88613		
<b>EP-27 Emergency Diesel Fire Pump</b>				
<b>Usage (Hours)</b>		<b>HAP Emission Factor<sup>6</sup> (lb/hour)</b>		<b>HAP Emissions<sup>5</sup> (tons)</b>
		0.0046875		
<b>EP-31 Injection Molding</b>				
<b>ABS Used (lbs)</b>		<b>HAP Emission Factor<sup>7</sup> (lb/lb)</b>		<b>HAP Emissions<sup>8</sup> (tons)</b>
		0.0001		
<b>Non ABS Material Used (Name, Type)</b>	<b>Amount of Non ABS Material Used (gallons)</b>	<b>Density (lb/gal)</b>	<b>HAP Content (weight percent)</b>	<b>HAP Emissions<sup>1</sup> (tons)</b>
<b>Monthly Plantwide HAP Emissions<sup>9</sup> (tons):</b>				

<sup>1</sup>HAP Emissions (tons) = Amount of Material Used (gallons) x Density (lb/gal) x Combined HAP Content (weight percent) / 100 (percent) x 0.0005 (ton/lb)

<sup>2</sup>The HAP Emission Factor for natural gas combustion was taken from AP-42 Tables 1.4-3 and 1.4-4.

<sup>3</sup>HAP Emissions (tons) = Natural Gas Combustion (MMscf) x HAP Emission Factor (lb/MMscf) x 0.0005 (ton/lb).

<sup>4</sup>The HAP Emission Factor for electroplating was calculated as the sum of the individual HAP emissions plus ten percent. Chromium Compounds (20-06-4): 0.00006 lb/hr from stack testing. Nickel Compounds (20-14-4): 0.016273 lb/hr from Equations 1 and 4 of AP-42's Chapter 12. Formaldehyde (50-00-0): 69 percent consumption based upon testing conducted at another facility, 98 percent capture assumed, and 0.09 lb/hr from stack testing of the scrubber. Methanol (67-56-1): 98 percent capture assumed and 0.77 lb/hr from stack testing of the scrubber. Hydrogen Chloride (7647-01-0): 0.0097998 lb/hr from Equations 1 and 4 of AP-42's Chapter 12.

<sup>5</sup>HAP Emissions (tons) = Usage (hours) x HAP Emission Factor (lb/hour) x 0.0005 (ton/lb)

<sup>6</sup>The HAP Emission Factor for the emergency engine was taken from AP-42 Table 3.3-2 and converted from lb/MMBtu to lb/hour by multiplying by 240 HP and 0.007 MMBtu/HP-hr (AP-42 Table 3.3-1).

<sup>7</sup>The HAP Emission Factor is based upon stack testing data with 0.0002 lb/hr of VOC emissions consisting of 50 percent HAP.

<sup>8</sup>HAP Emissions (tons) = ABS Used (lbs) x HAP Emission Factor (lb/lb) x 0.0005 (ton/lb)

<sup>9</sup>Monthly Plantwide HAP Emissions (tons) = the sum of each emission unit's HAP Emissions (tons)

**Attachment B Continued**  
 Plantwide HAP Worksheet

Month and Year	12-Month Rolling Total HAP Emissions <sup>10</sup> (tons)	Month and Year	12-Month Rolling Total HAP Emissions <sup>10</sup> (tons)

<sup>10</sup>12-Month Rolling Total HAP Emissions (tons) = Monthly Plantwide HAP Emissions (tons) + the previous 11 Monthly Plantwide HAP Emissions (tons). **The permittee is in compliance with PW001 if 12-Month Rolling Total HAP Emissions are less than 25 tons.**









**Attachment G**  
 10 CSR 10-3.060 Compliance Demonstration

This attachment may be used to demonstrate that the listed emission units are in compliance with 10 CSR 10-3.060 *Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*. Installation's Total Heat Input (Q) in MMBtu/hr:

<b>Emission Unit</b>	<b>Description</b>	<b>MHDR (MMBtu/hr)</b>
EP-6	Boiler #4	10.5
EP-20	(4) Drying Ovens	6
EP-28	Water Sprinkler System Boiler	0.992
EP-32A	(10) Air Makeup Units	72.2
EP-32B	(30) Space Heaters	14.5
<b>Total Q</b>		104.192

The maximum allowable PM emission rate from new indirect heating source having an intermediate capacity between 10 MMBtu and 2,000 MMBtu shall be determined by the following equation: [10 CSR 10-3.060(5)(B)]

$$E = 1.31(Q)^{-0.338}$$

$$E = 1.31(104.192)^{-0.338} = 0.27 \text{ lbs/MMBtu}$$

<b>Emission Unit</b>	<b>Description</b>	<b>Emission Factor (lb/MMsf)</b>	<b>Emission Factor (lb/MMBtu)</b>	<b>Emission Limit (lb/MMBtu)</b>
EP-6	Boiler #4	7.6	0.007	0.27
EP-20	(4) Drying Ovens	7.6	0.007	0.27
EP-28	Water Sprinkler System Boiler	7.6	0.007	0.27
EP-32A	(10) Air Makeup Units	7.6	0.007	0.27
EP-32B	(30) Space Heaters	7.6	0.007	0.27

The natural gas PM emission factor was taken from FIRE for Process SCC 10200602. The heat content of the natural gas was taken to be 1,050 MMBtu/MMscf from AP-42's Appendix A. The calculations demonstrate that the emission units have worst-case emissions far below the applicable emission limit; therefore, no monitoring or recordkeeping is required while combusting natural gas. The emission units are in compliance with the emission limit without the aid of a control device; therefore, 40 CFR Part 64 *Compliance Assurance Monitoring* is not applicable.





## STATEMENT OF BASIS

### 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) Part 70 Operating Permit Application, received February 28, 2011
- 2) 2007, 2008, 2009, 2010, and 2011 Emissions Inventory Questionnaires
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
- 4) U.S. EPA's Factor Information Retrieval (FIRE) Date System 6.25
- 5) 40 CFR Part 63, Subpart N Operation and Maintenance Plan as revised October 12, 2009
- 6) Construction Permit 1298-009, Issued November 12, 1998
- 7) Construction Permit 1198-008, Issued September 18, 1998
- 8) No Construction Permit Required Determination, Issued November 16, 1999:

### Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.100 *Alternate Emission Limits* is not applicable to the installation and has not been applied within this permit. This rule applies to installations that emit VOC in ozone nonattainment areas. [10 CSR 10-6.100(1)(A)] The installation is in an ozone attainment area.

10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes* is not applicable to the installation and has not been applied within this permit. EP-6, EP-20, EP-28, EP-31, EP-32A, and EP-32B are exempt from this regulation per 10 CSR 10-6.400(1)(B)6 as they are indirect heating sources. EP-7, (4) Plastic Storage Silos, and Plastic Grinding Operations are exempt from this regulation per 10 CSR 10-6.400(1)(B)12 as they have potential emissions of PM below 0.5 lb/hr. EP-3A and EP-3B are exempt from this regulation per 10 CSR 10-6.400(1)(B)14 as they are coating operations with a federally enforceable permit condition (Permit Conditions 007 and 008) requiring the use of a control system (fabric filters) with a control efficiency greater than 95 percent (99.4 percent).

10 CSR 10-6.405 *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating* is not applicable to the installation and has not been applied within this permit. 10 CSR 10-6.405(1)(E) exempts installations that are fueled exclusively by natural gas. 10 CSR 10-6.405 has not yet been accepted into Missouri's SIP.

### Construction Permits

Construction Permit 1298-009, Issued November 12, 1998:

- This de minimis construction permit is for the installation of EP-3B Paint Booths 40 – 43. The operations include four spray booths using high velocity low pressure spray guns. This permit is a remedial action. The booths were constructed after 1983 without a construction permit. PM<sub>10</sub> emissions are controlled by a 99 percent efficient baghouse.
- Special Conditions 1, 3, 5.A, and 6 have been applied within this permit (see Permit Condition 001).

- Special Conditions 2, 4, and 5.B required EP-3B Paint Booths 40 – 43 to emit less than ten tons of each individual HAP and less than 25 tons of combined HAPs. These special conditions were not applied within this permit as it is less restrictive than Permit Condition PW001 which requires the entire installation to emit less than ten tons of each individual HAP and less than 25 tons of combined HAPs.

Construction Permit 1198-008, Issued September 18, 1998:

- This de minimis construction permit is for the installation of EP-6 Boiler No. 4. The boiler is permitted to combust natural gas at 10.5 MMBtu/hr and replaced an existing 8.4 MMBtu/hr boiler.
- This construction permit does not contain any special conditions.

No Construction Permit Required Determination, Issued November 16, 1999:

- This no construction permit required determination is for the installation of a 1 MMBtu/hr natural gas fired drying oven.
- The drying oven is one of the four drying ovens reported under EP-20 (4) Drying Ovens.

### **New Source Performance Standards (NSPS) Applicability**

40 CFR Part 60, Subparts D, Da, and Db – *Standards of Performance for Steam Generating Units* are not applicable to the installation and have not been applied within this permit. Subparts D and Da are only applicable to steam generating units with a heat input rate greater than 250 MMBtu/hr. [§60.40(a) and §60.40a(a)] Subpart Db is only applicable to steam generating units with a heat input rate greater than 100 MMBtu/hr. [§60.40b(a)] EP-6 Boiler #4 and EP-28 Water Sprinkler System Boiler are too small to be subject to these regulations.

40 CFR Part 60, Subpart Dc – *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* is applicable to the installation and has been applied within this permit (see Permit Condition 003). This subpart is applicable to steam generating units with a heat input rate greater than 10 MMBtu/hr. [§60.40c(a)] EP-6 Boiler #4 is subject to this regulation; however, EP-28 Water Sprinkler System Boiler is rated at 0.992 MMBtu/hr and is too small to be subject to any of these regulations. This regulation may be referenced at: <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=185bdc165a6c68b9a1df1bc3fa8e658c&rgn=div6&view=text&node=40:6.0.1.1.1.12&idno=40>

40 CFR Part 60, Subparts K, Ka, and Kb – *Standards of Performance for Liquid Storage Vessels* are not applicable to the installation and have not been applied within this permit. Subparts K and Ka are only applicable to storage vessels greater than 40,000 gallons in capacity constructed after June 11, 1973. [§60.110(a) and §60.110a(a)] Subpart Kb is only applicable to storage vessels greater than 75 m<sup>3</sup> (19,182 gallons) in capacity constructed after July 23, 1984. [§60.110b(a)] None of the tanks located at the installation are greater than 19,182 gallons in capacity.

40 CFR Part 60, Subpart IIII – *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* is not applicable to the installation and has not been applied within this permit. This subpart is applicable to owners and operators of fire pumps manufactured as certified National Fire Protection Association fire pump engines after July 1, 2006. [60.4200(a)(2)(ii)] EP-27 Emergency Diesel Fire Pump was manufactured prior to July 1, 2006.

## **Maximum Achievable Control Technology (MACT) Applicability**

40 CFR Part 63, Subpart N – *National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks* is applicable to the tanks associated with the chromium electroplating and has been applied within this permit (see Permit Condition 004). This regulation may be referenced at: <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=ff2846d70a9b1e68603ced4a15531ea0&rgn=div6&view=text&node=40:9.0.1.1.1.14&idno=40>

40 CFR Part 63, Subpart IIII – *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobile and Light-Duty Trucks* is not applicable to the installation and has not been applied within this permit. This regulation applies to coating operations which apply coatings to new other motor vehicle bodies or body parts for new other motor vehicles; parts intended for use in new automobiles, new light-duty trucks, or new other motor vehicles; or aftermarket repair or replacement parts for automobiles, light-duty trucks, or other motor vehicles; and is located at a major source or is part of a major source of emissions of HAP. [§63.3081(b)] The installation is a synthetic minor source of HAPs.

40 CFR Part 63, Subpart MMMM – *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products* is not applicable to the installation and has not been applied within this permit. This regulation applies to major sources of HAPs surface coating miscellaneous metal parts and products including, but not limited to, metal components of the following types of products as well as the products themselves: motor vehicle parts and accessories, bicycles and sporting goods, recreational vehicles, extruded aluminum structural components, railroad cars, heavy duty trucks, medical equipment, lawn and garden equipment, electronic equipment, magnet wire, steel drums, industrial machinery, metal pipes, and numerous other industrial, household, and consumer products. [§63.3881(b)] The installation is a synthetic minor source of HAPs.

40 CFR Part 63, Subpart PPPP – *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastics Parts and Products* is not applicable to the installation and has not been applied within this permit. This regulation applies to major sources of HAPs surface coating plastic parts and products including, but not limited to, plastic components of the following types of products as well as the products themselves: motor vehicle parts and accessories for automobiles, trucks, recreational vehicles; sporting and recreational goods; toys; business machines; laboratory and medical equipment; and household and other consumer products. [§63.4481(b)] The installation is a synthetic minor source of HAPs.

40 CFR Part 63, Subpart WWWW – *National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production* is not applicable to the installation and has not been applied within this permit. This regulation applies to operations in which reinforced and/or nonreinforced plastic composites or plastic molding compounds are manufactured using thermoset resins and/or gel coats that contain styrene to produce plastic composites. [§63.5785(a)] The installation is a synthetic minor source of HAPs.

40 CFR Part 63, Subpart ZZZZ – *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* is applicable to the installation and has been applied within this permit (see Permit Condition 005). This regulation may be referenced at:

<http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&rgn=div6&view=text&node=40:13.0.1.1.1.1&idno=40>

40 CFR Part 63, Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters* is not applicable to the installation and has not been applied within this permit. This regulation is under reconsideration; however, it only applies to major HAP sources and in the installation is a synthetic minor source.

40 CFR Part 63, Subpart HHHHHH – *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* is not applicable to the installation and has not been applied within this permit. This regulation applies to methylene chloride paint stripping, autobody refinishing, and spray applications where the coating contains chromium, lead, manganese, nickel, or cadmium. [§63.11169] The facility does not use methylene chloride. §63.11180 defines motor vehicle and mobile equipment surface coating as “the spray application of coatings to assembled motor vehicles or mobile equipment. For the purpose of this subpart, it does not include the surface coating of motor vehicle or mobile equipment parts or subassemblies at a vehicle assembly plant or parts manufacturing plant.” The installation also does not use coating containing metal HAPs.

40 CFR Part 63, Subpart JJJJJJ – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources:*

- ♦ On March 21, 2011, the Boiler GACT was published in the federal register. The installation is not subject to this regulation as finalized March 21, 2011; however, on December 23, 2011, EPA proposed amending this regulation.
- ♦ On March 13, 2012, EPA issued a No Action Assurance Letter to establish that they will exercise enforcement discretion to not pursue enforcement action for violations of the initial tune-up deadlines within this regulation. EPA intends to issue a final reconsideration rule prior to any of the compliance dates for existing sources listed within the regulation. The applicability of the Boiler GACT to the installation will need to be reevaluated after the issuance of the final reconsideration rule as substantial changes to the regulation may occur.

40 CFR Part 63, Subpart WWWW – *National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations* is applicable to the installation and has been applied within this permit (see Permit Condition 006). This regulation may be referenced at:

<http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr;rgn=div6;view=text;node=40%3A14.0.1.1.1.36;idno=40;sid=ce9a35561527d91c91cbd8738090c8ab;cc=ecfr>

### **National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

40 CFR Part 61, Subpart M – National Emission Standards for Asbestos is applicable to the installation and has been applied within this permit (see Section IV. Core Permit Requirements).

### **Compliance Assurance Monitoring (CAM) Applicability**

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

### **Greenhouse Gas Emissions**

On May 13, 2010, EPA issued the Greenhouse Gas (GHG) Tailoring Rule which set the major source threshold for CO<sub>2</sub>e to be 100,000 tons per year within 40 CFR Part 70. As of July 1, 2011, all Title V operating permits were required to include GHG emissions. Potential emissions of greenhouse gases (CO<sub>2</sub>e) for this installation are calculated to be 52,345.38 tons, classifying the installation as a minor source of GHGs. At the time of this permit issuance, there were no applicable GHG requirements for this installation.

### **Other Regulatory Determinations**

10 CSR 10-3.060 *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating* was rescinded by the State of Missouri on October 30, 2011 and replaced by 10 CSR 10-6.405 *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating*. 10 CSR 10-3.060 has not yet been removed from Missouri's State Implementation Plan (SIP) and is, therefore, still federally enforceable, but not state enforceable (see Permit Condition 002). 10 CSR 10-3.060 will no longer be federally enforceable upon removal from Missouri's SIP.

10 CSR 10-6.170 *Restriction of Particulate Matter to Ambient Air Beyond the Premises of Origin* is applicable to the installation and has been applied within this permit (see Section IV. Core Permit Requirements).

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* is applicable to the installation and has been applied within this permit (see Permit Condition 007). EP-27 is exempt from this regulation per 10 CSR 10-6.220(1)(A) as an internal combustion engine. This regulation is applicable to the following sources of visible emissions; however, each visible emission source has potential emissions of less than 0.5 pounds per hour and is not expected to exceed the opacity limits while being properly maintained and operated:

<b>Emission Unit</b>	<b>Description</b>
6	Boiler #4
7	Electroplating
20	(4) Drying Ovens
28	Water Sprinkler System Boiler
32A	(10) Air Makeup Units
32B	(30) Space Heaters
	(4) Plastic Storage Silos
	Plastic Grinding Operations

10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds* is applicable to the installation and has been applied within this permit (see Permit Condition 009). EP-6, EP-20, EP-28, EP-31, EP-32A, and EP-32B are exempt from this regulation per 10 CSR 10-6.260(1)(A)2 as they exclusively combust pipeline grade natural gas.

The determinations made within this permit are based upon the following installation-wide potential emission calculations:

Pollutant	Potential Emissions <sup>1</sup> (tons per year)
CO	36.91
CO <sub>2e</sub>	52,345.38
NH <sub>3</sub>	3.96
NO <sub>x</sub>	45.32
PM CON	2.48
PM <sub>10</sub>	12.30
PM <sub>2.5</sub>	0.83
SO <sub>x</sub>	1.38
VOC	105.03
HAP	14.78
Xylene (1330-20-7)	4.05
Methanol (67-56-1)	3.91
Methyl Isobutyl Ketone (108-10-1)	1.92
Ethylbenzene (100-41-4)	1.60
Hexane (110-54-3)	0.78
Formaldehyde (50-00-0)	0.73
Styrene (100-42-5)	0.62
Toluene (108-88-3)	0.40
Cumene (98-82-8)	0.13
Cobalt Compounds (20-07-5)	0.09
Glycol Ethers (20-00-0)	0.08
Nickel Compounds (20-14-4)	0.08
Hexamethylene Diisocyanate (822-06-0)	0.08
Antimony Compounds (20-00-8)	0.08
Hydrogen Chloride (7647-01-0)	0.05

<sup>1</sup>Potential emissions are based upon 8,760 hours of uncontrolled annual operation unless otherwise noted:

- ◆ Potential emissions from EP-3A and EP-3B Coating Operations were based upon scaled-up actuals from April 2010 - March 2011. During this time period the facility operated 6,077 hours. In order to reach potential the actuals were scaled up by 8,760/6,077 hours and increased by a factor of ten to ensure that maximum hourly production was reached. For EP-3A and EP-3B Coating Operations the average pollutant content was determined by taking the actual pollutant emissions and dividing by the gallons used and increased by a factor ten to account for worst-case paints. Due to this calculation being a scale-up it is highly recommended that potential emissions from EP-3A and EP-3B be recalculated upon permit renewal.
- ◆ Potential HAP emissions from EP-7 Electroplating were calculated as the sum of the individual HAP emissions increased by a factor of ten to account for variations between actual production rate and maximum production rate:
  - Chromium Compounds (20-06-4): 0.00006 lb/hr from stack testing.
  - Nickel Compounds (20-14-4): 0.016273 lb/hr from Equations 1 and 4 of AP-42's Chapter 12.
  - Formaldehyde (50-00-0): 69 percent consumption based upon testing conducted at another facility, 98 percent capture assumed, and 0.09 lb/hr from stack testing of the scrubber.
  - Methanol (67-56-1): 98 percent capture assumed and 0.77 lb/hr from stack testing of the scrubber.
  - Hydrogen Chloride (7647-01-0): 0.0097998 lb/hr from Equations 1 and 4 of AP-42's Chapter 12.
- ◆ Potential Styrene (100-42-5) emissions from EP-31 Injection Molding were based upon stack testing data with 0.0002 lb/hr of VOC emissions consisting of 50 percent Styrene. All other potential emissions from EP-31 Injection Molding were based upon scaled up actuals from April 2010 - March 2011. During this time period the facility operated 6,077 hours. In order to reach potential the actuals were scaled up by 8,760/6,077 hours and increased by a factor of ten to ensure that maximum hourly production was reached.
- ◆ EP-27 was evaluated at 500 hours of annual operation due to emergency use only status.

**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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Alana L. Rugen, EIT  
Environmental Engineer II

CERTIFIED MAIL: 70041350000314153991  
RETURN RECEIPT REQUESTED

Mr. Glenn Lowe  
SRG Global - Portageville  
101 Meatte Street  
Portageville, MO 63873

Re: SRG Global - Portageville, 143-0015  
Permit Number: **OP2012-041**

Dear Mr. Lowe:

Enclosed with this letter is your Part 70 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 (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC 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 AHC.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Alana Rugen at the Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

**AIR POLLUTION CONTROL PROGRAM**

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

MJS:ark

Enclosures

c: Southeast Regional Office  
PAMS File: 2011-03-001

Mr. Glenn Lowe  
Plant Manager  
SRG Global - Portageville  
101 Meatte Street  
Portageville, MO 63873

RE: Part 70 Operating Permit Renewal, Project: 2011-03-001  
Response to Public Comments

Dear Mr. Lowe,

The Missouri Air Pollution Control Program has received comments from EPA on the draft Part 70 Operating Permit for SRG Global – Portageville (143-0015). The Air Pollution Control Program has revised your Part 70 Operating Permit in response to the comments.

Enclosed is the Air Pollution Control Program's response to EPA's comment. The Part 70 operating permit is being forwarded for final executive approval and issuance.

If you have any questions or additional comments, please do not hesitate to contact me at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 526-0189. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Alana L. Rugen, EIT  
Environmental Engineer II

ALR/kjc

Enclosures: Final Title V Operating Permit  
Response to Public Comment

c: Southeast Regional Office  
PAMS File 2011-03-001

Mr. Mark A. Smith  
Air Permitting and Compliance Branch Chief  
EPA Region 7  
901 North 5<sup>th</sup> Street  
Kansas City, KS 66101

RE: Part 70 Operating Permit Renewal, Project: 2011-03-001  
Response to Public Comments

Dear Mr. Smith,

The Missouri Air Pollution Control Program has received your comments submitted during the public comment period on the draft Part 70 Operating Permit Renewal for SRG Global – Portageville (143-0015). The Air Pollution Control Program has revised the draft operating permit in response to the comments. Enclosed is the Air Pollution Control Program's response to the comments. The Part 70 Operating Permit Renewal is being forwarded for final executive approval and issuance.

If you have any questions or additional comments, please do not hesitate to contact me at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 526-0189. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Alana L. Rugen, EIT  
Environmental Engineer II

ALR/kjc

Enclosures: Final Title V Operating Permit  
Response to Public Comment

c: Southeast Regional Office  
PAMS File 2011-03-001

## MEMORANDUM

DATE: August 13, 2012

TO: 2011-03-001, SRG Global – Portageville (143-0015)

FROM: Alana L. Rugen, EIT  
Environmental Engineer II

SUBJECT: Response to Public Comments

The draft Part 70 Operating Permit for SRG Global – Portageville (143-0015) was placed on public notice as of June 28, 2012, for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: <http://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm> on Thursday, June 28, 2012. On July 19, 2012, the Air Pollution Control Program received comments from EPA Region 7's Mark A. Smith, Air Permitting and Compliance Branch Chief, the comments will be addressed within this Response to Public Comment document.

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### **Public Comment #1:**

The application submitted by SRG Global—Portageville dated February 25, 2011 and the draft Part 70 operating permit placed on public notice June 28, 2012 by MDNR both appear to use emission point numbers in lieu of emission unit numbers. Emission unit numbers assigned by MDNR have traditionally been listed as EUxxxx. Additionally, the current Part 70 operating permit for the Portageville facility shows emission unit numbers as EUxxxx. However, the draft Part 70 operating permit and SRG Global's application show emission units as EPxx.

EPA recommends that MDNR verify that these are true and accurate emission unit numbers and proceed accordingly.

**Missouri Air Pollution Control Program Response to Public Comment #1:**

Previously operating permits issued by the Missouri Air Pollution Control Program used arbitrarily assigned EU numbers to represent emission units at the facility; however, in an effort to streamline the permitting process and avoid facility confusion operating permits are now using the already assigned EP numbers as reported in the facility's annual Missouri Emissions Inventory Questionnaire (EIQ). The Missouri Air Pollution Control Program understands that there will be a period of transition and possible confusion during this switch; however, the switch should reduce future confusion and enable easier, better data collection and better permit compliance.

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**Public Comment #2:**

The installation name on Form OP-CO1 of the application submitted by SRG Global—Portageville dated February 25, 2011 does not match the installation name used throughout the remainder of the application.

EPA recommends that MDNR request SRG Global—Portageville submit a corrected Form OP-CO1.

**Missouri Air Pollution Control Program Response to Public Comment #2:**

Siegel-Robert Automotive – Portageville was the installation's name prior to 2009. In 2009 the installation became SRG Global – Portageville. The Missouri Air Pollution Control Program has records documenting the name change; therefore, additional paperwork is not necessary.

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**Public Comment #3:**

Permit Conditions 003, 004, and 005 include references to "Administrator" which should more appropriately be the "Director."

EPA suggests MDNR review and replace Administrator with Director, as appropriate.

### Missouri Air Pollution Control Program Response to Public Comment #3:

The Missouri Air Pollution Control Program is citing a federal regulation when using the term **Administrator**. The Missouri Air Pollution Control Program is a state regulatory agency and does not have the authority to make substantial changes to the Code of Federal Regulations. Missouri does not accept delegation of every federal regulation due to limited resources; therefore, the term **Administrator** is used. The Missouri Air Pollution Control Program has been using the term **Administrator** in our issued and effective operating permits for a number of years to no ill effect. The Missouri Air Pollution Control Program's Compliance and Enforcement Section maintains a list of which federal standards Missouri has and hasn't accepted delegation for. This list is available to all our inspectors.

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### Public Comment #4:

The truth, accuracy and completeness statement in the "Application for Authority to Operate," submitted by SRG Global—Portageville dated February 25, 2011 is signed by the Plant Manager as the Responsible Official." This same individual is shown in the draft Part 70 operating permit as the Responsible Official. 10 CSR 10-6.020 defines the "Responsible Official" to include one of the following:

A. The president, secretary, treasurer, or vice-president of a corporation in charge of a principal business function, any other person who performs similar policy and decision-making functions for the corporation, or a duly-authorized representative of this person if the representative is responsible for the overall operation of one (1) or more manufacturing, production, or operating facilities applying for or subject to a permit and either—

(I) The facilities employ more than two hundred fifty (250) persons or have a gross annual sales or expenditures exceeding twenty-five (25) million dollars (in second quarter 1980 dollars); or

(II) The delegation of authority to this representative is approved in advance by the permitting authority;

B. A general partner in a partnership or the proprietor in a sole proprietorship;

C. Either a principal executive officer or ranking elected official in a municipality or state, federal, or other public agency. For the purpose of this subparagraph, a principal executive officer of a federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency; or

D. The designated representative of an affected source insofar as actions, standards, requirements, or prohibitions under Title IV of the Act or the regulations promulgated under the Act are concerned and the designated representative for any other purposes under part 70.

Additionally, the definition section of 40 CFR 70.2 Responsible official (1)(i) states that the Plant Manager may sign the compliance certification as a responsible official if "The delegation of authority to such representatives is approved in advance by the permitting authority". This delegation is further clarified in the Part 70 preamble on page 32275 of the July 21, 1992 Federal Register. It states: In the final rule, the definition of "responsible official" has been expanded to

allow for delegation of authority to a plant manager where the delegation has been approved in advance by the permitting authority.

That being said, did SGR Global have pre-approval from MDNR to allow the plant manager to sign as the responsible official for the truth, accuracy and completeness statement and to be assigned as the Responsible Official in the Part 70 operating permit? EPA suggests that this should be addressed in the statement of basis.

#### **Missouri Air Pollution Control Program Response to Public Comment #4:**

The permit application was deemed administratively complete on Tuesday, April 26, 2011. An e-mail notification was sent to EPA's Eric Sturm and Tamara Freeman.

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#### **Public Comment #5:**

The draft amended Part 70 operating permit fails to include a permit condition for the appropriate National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers. SRG Global—Portageville appears to be subject to this MACT. The National Emission Standards for Hazardous Air Pollutants for area source boilers were published in the Federal Register on March 21, 2011 and became effective May 20, 2011.

On May 18, 2011, EPA published a notice delaying the effective date of the major source boiler MACT only and the requirements for the area source boilers are still in effect. On December 23, 2011, EPA proposed amendments to the area boiler MACT and on March 13, 2012 EPA issued a No Action Assurance (NAA) letter around only the initial boiler tune-up provision of the MACT. The NAA letter only means that the EPA will use its enforcement discretion in pursuit of violators of initial tune-up deadlines. The initial tune-up deadline is proposed to be extended to March 21, 2013, however, this has not been finalized.

Therefore, EPA recommends that MDNR include an appropriate permit condition for the area boiler MACT or describe why the standard does not apply in the statement of basis.

#### **Missouri Air Pollution Control Program Response to Public Comment #5:**

The Boiler GACT has not been added to the permit. The effective regulation as published March 21, 2011 is not applicable to the installation. The Missouri Air Pollution Control Program is aware that EPA intends to issue a final reconsideration rule that may substantially change the regulation; therefore, the Missouri Air Pollution Control Program included informational language in the Statement of Basis to notify the installation that the regulation may become applicable to them in the future. The Missouri Air Pollution Control Program has modified/clarified the informational language in the Statement of Basis.

ALR/kjc