

STATE OF MISSOURI  
**DEPARTMENT OF NATURAL RESOURCES**

Matt Blunt, Governor • Doyle Childers, Director

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MAR 29 2006

Mr. Robert E. McKendry, Jr., President  
Mid-West Industrial Chemical Company  
1509 Sublette Ave.  
St. Louis, MO 63110

Re: Mid-West Industrial Chemical Company, 510-1077  
Permit Number: **OP2006-018**

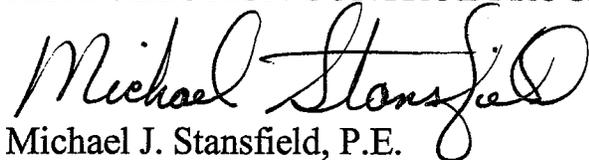
Dear Mr. McKendry:

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.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



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

MJS:nvb

Enclosures

c: Ms. Tamara Freeman, U.S. EPA Region VII  
St. Louis Regional Office  
PAMS File: 2005-01-053



## PERMIT TO OPERATE

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

**Operating Permit Number:** OP2006-018

**Expiration Date:**

**Installation ID:** 510-1077

**Project Number:** 2005-01-053

**Installation Name and Address**

Mid-West Industrial Chemical Company  
1509 Sublette Ave.  
St. Louis, MO 63110  
St. Louis City

**Parent Company's Name and Address**

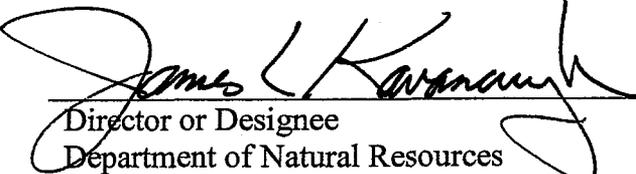
Mid-West Industrial Chemical Company  
1509 Sublette Ave.  
St. Louis, MO 63110  
St. Louis City

**Installation Description:**

Mid-West Industrial Chemical Company manufactures adhesives. This facility uses rubber and resins to produce adhesives. The three types of adhesives produced are water based, solvent based, and dry based adhesives. This facility is Major for Volatile Organic Chemicals (VOCs).

MAR 29 2006

Effective Date

  
Director or Designee  
Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Mid-West Industrial Chemical Company manufactures adhesives. This facility uses rubber and resins to produce adhesives. The three types of adhesives produced are water based, solvent based, and dry based adhesives. This facility is Major for Volatile Organic Chemicals (VOCs).

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO <sub>x</sub> )	Nitrogen Oxides (NO <sub>x</sub> )	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
1999	1.24	0	0.13	12.56	0.03	0	8.70
2000	1.37	0	0.12	13.98	0.02	0	6.58
2001	1.08	0	0.13	11.06	0.03	0	8.52
2002	0.84	0	0.14	8.57	0.03	0	6.41
2003	0.81	0	0.12	8.30	0.02	0	6.24
2004	0.75	0	0.12	7.63	0.02	0	5.70

### EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit
EU0010	2,219 MMBTU/hr boiler (EP-11)
EU0020	Rubber grinder (EP-10)

### EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source
Five (5) 550 gallon solvent adhesive mixers (EP-09)
440 gallon solvent adhesive mixer (EP-09)
220 gallon solvent adhesive mixer (EP-09)
Two (2) 165 gallon solvent adhesive mixers (EP-09)
Two (2) 55 gallon solvent adhesive mixers (EP-09)
10,500 gallon N-Hexane storage tank (EP-01)
10,500 gallon Toluene storage tank (EP-04)
4,300 gallon MEK storage tank (EP-05)
4,300 gallon Xylene storage tank (EP-07)
10,500 gallon Heptane solvent storage tank (EP-03)
4,300 gallon Ethyl Alcohol solvent storage tank (EP-06)
4,300 gallon Naphtha solvent storage tank (EP-08)
Three (3) 400 gallon emulsion storage tanks
One 1,500 gallon emulsion storage tank
One 8,000 gallon latex storage tank
Two (2) 2,400 gallon synthetic latex storage tanks
One 10,500 gallon Acetone solvent storage tank (EP-02)

One 450 gallon emulsion mixer  
One 300 gallon emulsion mixer  
Two (2) 500 gallon water based mixers

**DOCUMENTS INCORPORATED BY REFERENCE**

These documents have been incorporated by reference into this permit.

NONE

## 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.

### Permit Condition PW001

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 or 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.

##### Monitoring:

1. The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. If a violation of this regulation is discovered, the source shall undertake corrective action to eliminate the violation.

The following monitoring schedule must be maintained:

- a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
  - b) Observations must be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
  - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
2. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

##### Record Keeping:

A log must be maintained noting the following:

1. Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
  2. Whether the visible emissions were normal for the installation.
  3. Equipment malfunctions that could cause an exceedance of 10 CSR 10-6.170.
  4. Any violations of 10 CSR 10-6.170 and any corrective actions undertaken to correct the violation.
- Attachment A contains a log including these record keeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.

##### Reporting:

The permittee shall report any deviation from any of the requirements of this permit condition using the semi-annual monitoring report and annual compliance certification to the City of St. Louis Air Pollution Control Program, 1415 North 13<sup>th</sup> Street, St. Louis, MO 63106-4424 and Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

**Permit Condition PW002**

10 CSR 10-6.065

**Operating Permits**

Voluntary Permit Condition, 10 CSR 10-6.065(6)(C)2.A

**Emission Limitation:**

1. This installation shall emit less than ten (10) tons of any individual hazardous air pollutant during any consecutive 12 month period.
2. This installation shall emit less than twenty five (25) tons of any combination of hazardous air pollutants during any consecutive 12 month period.

**Monitoring/Record Keeping:**

1. The permittee shall maintain an accurate record of HAP's emitted into the atmosphere from the installation. The permittee shall use Attachment D, "Monthly Combined HAP Emission Tracking Record", and Attachment E, "Monthly Individual HAP Emission Tracking Record", or equivalent forms to verify compliance with the emission limitations listed above.
2. These records must be made available immediately for inspection to City of St. Louis and/or Department of Natural Resources' personnel upon request.

**Reporting:**

The permittee shall report any deviation from any of the requirements of this permit condition using the semi-annual monitoring report and annual compliance certification to the City of St. Louis Air Pollution Control Program, 1415 North 13<sup>th</sup> Street, St. Louis, MO 63106-4424 and Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

**Permit Condition PW003**

10 CSR 10-5.390

**Control of Emissions from Manufacture of Paints, Varnishes, Lacquer, Enamels and Other Allied Surface Coating Products****Equipment and Operational Parameters:**

No owner or operator of a manufacturing installation producing paints, varnishes, lacquers, enamels or other allied surface coating products shall cause or allow the manufacture of these products unless the operating equipment meets the requirements contained in this rule and without adhering to operating procedures specified in this rule and operating procedures recommended by the equipment manufacturer and approved by the director.

1. Tanks storing VOC with a vapor pressure greater than or equal to ten (10) kilopascals at twenty (20) degrees Celsius, shall be equipped with pressure/vacuum conservation vents set at  $\pm 0.2$  kPa, except where more effective air pollution control is used. Stationary VOC storage containers with a capacity greater than two hundred and fifty (250) gallons shall be equipped with a submerged fill pipe or bottom fill, except where more effective air pollution control is used and has been approved by the director.
2. Covers shall be installed on all open-top tanks used for the production of non-waterbase coating products. These covers shall remain closed except when production, sampling, maintenance or inspection procedures require operator access.
3. Covers shall be installed on all tanks containing VOC used for cleaning equipment.
4. All grinding mills shall be operated and maintained in accordance with manufactures' specifications.

**Monitoring/Record Keeping:**

1. Records shall be kept on production rates sufficient to determine daily VOC emissions.
2. The permittee shall keep these records for a period of not less than five years
3. These records shall be made available to the director upon request.

**Reporting:**

The permittee shall report any deviation from any of the requirements of this permit condition using the semi-annual monitoring report and annual compliance certification to the City of St. Louis Air Pollution Control Program, 1415 North 13<sup>th</sup> Street, St. Louis, MO 63106-4424 and Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

### 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.

<b>EU0010</b> Natural Gas Boiler			
EU ID	EIQ Reference # (Year)	General Description	Manufacturer/Model #
EU0010	EP-11 (2003)	Natural Gas Boiler, 2.219 MMBTU/Hr, Installed 1992.	H.B. Smith Series 28A-7

#### Permit Condition EU010-001

10 CSR 10-5.030

#### Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating

**Emission Limitation:**

The permittee shall not emit particulate matter (PM) in excess of 0.40 pounds of particulate matter per million BTU of heat input from emission unit EU0010.

**Equipment and Operation Parameters:**

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

**Monitoring/Record Keeping:**

1. The permittee shall maintain potential to emit calculations in terms of pounds of particulate matter per million BTU of heat input for the fuel type burned in this emission unit (see Attachment G).
2. The permittee shall maintain an accurate record of the fuel type used in the boilers. Fuel purchase receipts that verify the fuel type will be acceptable.
3. These records must be made available immediately for inspection to City of St. Louis and/or Department of Natural Resources' personnel upon request.

**Reporting:**

The permittee shall report any deviation from any of the requirements of this permit condition using the semi-annual monitoring report and annual compliance certification to the City of St. Louis Air Pollution Control Program, 1415 North 13<sup>th</sup> Street, St. Louis, MO 63106-4424 and Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

**Permit Condition EU010-002**

10 CSR 10-6.260<sup>1, 2</sup>

***Restriction of Emission of Sulfur Compounds***

**Emission Limitation:**

No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.

[10 CSR 10-6.260(3)(B) & 10 CSR 10-6.010 Ambient Air Quality Standards]

<u>Pollutant</u>	<u>Concentration by Volume</u>	<u>Remarks</u>
a) Sulfur Dioxide (SO <sub>2</sub> )	0.03 parts per million (ppm)	Annual arithmetic mean
	0.14 ppm (365 micrograms per cubic meter (µg/m <sup>3</sup> ))	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 µg/m <sup>3</sup> )	3-hour average not to be exceeded more than once per year
b) Hydrogen Sulfide (H <sub>2</sub> S)	0.05 ppm (70 µg/m <sup>3</sup> )	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 µg/m <sup>3</sup> )	½-hour average not to be exceeded over 2 times in any 5 consecutive days
c) Sulfuric Acid (H <sub>2</sub> SO <sub>4</sub> )	10 µg/m <sup>3</sup>	24-hour average not to be exceeded more than once in any 90 consecutive days
	30 µg/m <sup>3</sup>	1-hour average not to be exceeded more than once in any 2 consecutive days

**Equipment and Operational Parameters**

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

**Monitoring/Record Keeping:**

1. The permittee shall maintain an accurate record of the sulfur content of the fuel used. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable.
2. These records shall be made available immediately for inspection to the City of St. Louis/Department of Natural Resources' personnel upon request.

**Reporting:**

The permittee shall report any deviation from any of the requirements of this permit condition using the semi-annual monitoring report and annual compliance certification to the City of St. Louis Air Pollution Control Program, 1415 North 13<sup>th</sup> Street, St. Louis, MO 63106-4424 and Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

<sup>1</sup> 10 CSR 10-6.260(3)(B) is a state-only requirement

<sup>2</sup> The current version of 10 CSR 10-6.260 (May 30, 2004, effective date) exempts combustion equipment that exclusively uses pipeline grade natural gas or liquefied petroleum gas, or any combination of these fuels, from the requirements of this rule. Therefore, when the provisions of the current version of 10 CSR 10-6.260 are incorporated into the federally approved SIP as a final EPA action, the emission units would not be subject to 10 CSR 10-6.260 and this permit condition will no longer be an applicable requirement in this operating permit.

<b>EU0020</b>			
<b>Rubber Grinder</b>			
EU ID	EIQ Reference # (Year)	General Description	Manufacturer/Model #
EU0020	EP-10 (2003)	Rubber grinder. Emissions controlled by a baghouse.	Unknown

### Permit Condition EU0020-001

St. Louis City Ordinance 65645, § 14<sup>3</sup>

**Restrictions of Visible Air Emissions**

10 CSR 10-6.220

**Restriction of Emission of Visible Air Contaminates**

**Emission Limitation:**

No person shall discharge into the atmosphere from any source of emission any air contaminant greater than 20% visible opacity for a period in excess of six (6) minutes in any consecutive sixty (60) minute period.

Any emissions in excess of 40% opacity, regardless of time, are considered excessive emissions.

**Monitoring:**

1. The permittee shall conduct opacity readings on these emission units using the procedures contained in USEPA Test Method 22. Readings are only required when the emission units are in operation and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2. The following monitoring schedule must be maintained:
  - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this limitation be observed during this period then-
  - b) Observations must be made once every two (2) weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this limitation be observed during this period then-
  - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

**Record Keeping:**

1. The permittee shall maintain records of all observation results (see Attachments B), noting:
  - a) Whether any air emissions (except for water vapor) were visible from the emission units,
  - b) All emission units from which visible emissions occurred, and
  - c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain records of any equipment malfunctions. (see Attachment F)
3. The permittee shall maintain records of any USEPA Method 9 opacity test (see attachment C) performed in accordance with this permit condition.
4. These records shall be made available immediately for inspection to City of St. Louis and/or Department of Natural Resources' personnel upon request.

<sup>3</sup> St. Louis City Ordinance 65645, §14 is a local agency rule which is enforceable by the City of St. Louis only.

**Reporting:**

1. The permittee shall report to the City of St. Louis Air Pollution Control Program, 1415 North 13<sup>th</sup> Street, St. Louis, MO 63106-4424 and Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no, later than ten (10) days after the permittee determined using the Method 9 test that the emission unit exceeded the opacity limit.
2. The permittee shall report any deviation from any of the requirements of this permit condition using the semi-annual monitoring report and annual compliance certification to the City of St. Louis Air Pollution Control Program, 1415 North 13<sup>th</sup> Street, St. Louis, MO 63106-4424 and Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

## IV. Core Permit Requirements

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.

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

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

### **10 CSR 10-6.060, Construction Permits Required**

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

**10 CSR 10-6.065, Operating Permits**

The permittee shall file for renewal of this operating permit no sooner than eighteen months, nor later than six months, prior to the expiration date of this operating permit. The permittee shall retain the most current operating permit issued to this installation on-site and shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

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

1. The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
2. The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
3. The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

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

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

**10 CSR 10-6.150, Circumvention**

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

**10 CSR 10-6.180, Measurement of Emissions of Air Contaminants**

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

**10 CSR 10-5.040, Use of Fuel in Hand-Fired Equipment Prohibited**

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

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

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

**St. Louis City Ordinance 65645, Sec 15, Open Burning Restrictions**

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

**10 CSR 10-5.160, Control of Odors in the Ambient Air**

No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:

1. Residential, recreational, institutional, retail sales, hotel or educational premises.
2. Industrial premises when air containing odorous matter is diluted with 20 or more volumes of odor-free air; or
3. Premises other than those in paragraphs (1)A.1. and (2) of the rule when air containing odorous matter is diluted with four or more volumes of odor-free air.

The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when 30% or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least 20 people or 75% of those exposed if fewer than 20 people are exposed.

**This requirement is not federally enforceable.**

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

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

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

**10 CSR 10-6.100, Alternate Emission Limits**

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

**10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants**

**40 CFR Part 61 Subpart M, National Emission Standard for Asbestos**

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

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

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the 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 record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

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

#### **10 CSR 10-6.280, Compliance Monitoring Usage**

1. The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Any other monitoring methods approved by the director.
2. Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
3. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - a) Applicable monitoring or testing methods, cited in:
    - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
    - ii) 10 CSR 10-6.040, "Reference Methods";
    - iii) 10 CSR 10-6.070, "New Source Performance Standards";
    - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
  - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

## V. General Permit Requirements

### Permit Duration

10 CSR 10-6.065(6)(C)1.B.

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.

### General Record Keeping and Reporting Requirements

10 CSR 10-6.065(6)(C)1.C

#### I) Record Keeping

- 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.

#### II) Reporting

A) The permittee shall submit a report of all required monitoring by:

- 1) October 1st for monitoring which covers the January through June time period, and
- 2) April 1st for monitoring which covers the July through December time period.
- 3) 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.

B) Each report must identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.

C) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.

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.

- 1) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if you wish 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 that you can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
- 2) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- 3) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in the permit.
- 4) These supplemental reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, 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.

**Risk Management Plans Under Section 112(r)**

10 CSR 10-6.065(6)(C)1.D.

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

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

**Severability Clause**

10 CSR 10-6.065(6)(C)1.F.

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.

**General Requirements**

10 CSR 10-6.065(6)(C)1.G

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and re-issuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, will 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.

**Incentive Programs Not Requiring Permit Revisions**

10 CSR 10-6.065(6)(C)1.H

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.

**Reasonably Anticipated Operating Scenarios**

10 CSR 10-6.065(6)(C)1.I.

Not applicable

**Title IV Allowances**

Not applicable

**Emissions Trading**

10 CSR 10-6.065(6)(C)1.J.

Not applicable

**Compliance Requirements**

10 CSR 10-6.065(6)(C)3.

- D) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- II) 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.
- III) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - A) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - B) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- IV) 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 1<sup>st</sup>, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5<sup>th</sup> Street, Kansas City, Kansas 66101, as well as the Air Pollution Control Program, 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.

### **Permit Shield**

10 CSR 10-6.065(6)(C)6.

- D) 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 applicable 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.
- II) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
  - A) The provisions of section 303 of the Act or section 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 administrator's authority to obtain information, or
  - E) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

### **Emergency Provisions**

10 CSR 10-6.065(6)(C)7.

- D) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7. 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.
- II) 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.

### **Operational Flexibility**

10 CSR 10-6.065(6)(C)8.

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 and the Administrator 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 established 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.

- I) Section 502(b)(10) changes. Changes that, under section 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), record keeping, 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 and to the Administrator, 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 this agency shall place a copy with the permit in the public file. Written notice shall be provided to the administrator and this agency 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 administrator and the permitting authority as soon as possible after learning of the need to make the change.
  - B) The permit shield shall not apply to these changes.

### **Off-Permit Changes**

10 CSR 10-6.065(6)(C)9.

- D) 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 permitting authority and to the administrator no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under paragraph (6)(B)3. of this rule. 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.

**Responsible Official**

10 CSR 10-6.020(2)(R)12.

The application utilized in the preparation of this was signed by Robert E. McKendry, Jr., President. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

**Reopening Permit For Cause**

10 CSR 10-6.065(6)(E)6.

In accordance with 10 CSR 10-6.065(6)(E)6.A., this permit may be reopened with cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) MDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or 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,
- 4) 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
- 5) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

**Statement of Basis**

10 CSR 10-6.065(6)(E)1.C.

This permit is accompanied by a statement setting forth the legal and factual basis for the draft 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.





Attachment C

This attachment may be used to help meet the record keeping requirements of Permit Condition: EU0020-001.

Method 9 Opacity Emissions Observations	
Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Seq Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from \_\_\_\_\_ to \_\_\_\_\_ % opacity.

Was the emission unit in compliance at the time of evaluation?

YES NO

\_\_\_\_\_  
 Signature of Observer







Attachment G

This attachment may be used to demonstrate compliance with 10 CSR 10-5.030, *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*

The emission limit for EU0010 (new, i.e. installed after 02/15/79) is 0.40 lbs PM per million BTUs of heat input. This is the maximum allowable emission rate for new sources at an installation of indirect heating sources with a heat input rate of less than ten (10) million BTUs per hour.

The following equipment was used to obtain the total heat input (Q) for the above equation:

Equipment	Heat Input (mmBtu/hr)
Natural Gas Boiler (EU0010)	2.219
<b>TOTAL</b>	<b>2.219</b>

The following table demonstrates compliance with the emission limit:

$$\text{Emission Rate (lb/mmBtu)} = \text{MHDR} * \text{Emission Factor} / \text{Heat Capacity (mmBtu/hr)}$$

Emission Unit #	Heat Capacity (MMBtu/hr)	Maximum Hourly Design Rate (10 <sup>6</sup> scf)	PM Emission Factor (lb/10 <sup>6</sup> scf)	Emission Factor Reference	Potential Emission Rate (lb/MMBtu)	Emission Rate Limit (lb/MMBtu)	Unit in Compliance? (Yes/No)
EU0010	2.219	0.0022	7.6	AP-42 - Ch. 1	0.0075	0.40	Yes

## 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 March 20, 2002; revised January 28, 2005
- 2) 2003 Emissions Inventory Questionnaire, received March 16, 2004;
- 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 document, FIRE, *Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants*, Version 6.23.

### Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

1. 10 CSR 10-5.030, *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*,  
This rule has been included in the operating permit since the facility does operate a natural gas fired boiler that is subject to the provisions of this rule.
2. 10 CSR 10-5.240, *Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area*,  
This rule has been included in the operating permit as per policy of MDNR for every source within the St. Louis Metropolitan Area.
3. 10 CSR 10-5.390, *Control of Emissions from Manufacture of Paints, Varnishes, Lacquers, Enamels and other Allied Surface Coating Products*,  
This rule has been included in the operating permit because this installation manufactures adhesives, which is a type of coating product. In 40 CFR Part 63 Subpart HHHHH, *Misc. Coating Manufacturing*; it defines a coating as an ink, paint, or adhesive. Since the uncontrolled potential VOC emissions of the installation are greater than 100 tons/yr and the operation is considered to be a coating manufacturing process this rule applies to this installation.
4. 10 CSR 10-6.100, *Alternate Emission Limits*  
This rule has been included in the operating permit in order to provide citing for the allowance of requests for alternate emission limits. This citing provides the information necessary to know that an alternate emission limit must be placed in a permit before the alternate emission limit may become effective.
5. 10 CSR 10-6.170, *Restriction of Particulate Matter to the Ambient Air*  
This rule has been included in the operating permit because the rule is a core permit requirement.
6. 10 CSR 10-6.180, *Measurement of Emissions of Air Contaminates*  
This rule has been included in the operating permit in order to provide citing for the allowance of requests for emissions data results. On past forms issued by the Air Pollution Control Program,

including the application for this permit, it was automatically marked as an administrative rule not required to be listed as an applicable requirement. It is no longer judged to be solely administrative and is, therefore, included in the operating permit.

7. 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*

This rule had not been created at the time of the initial application; however, it has been determined to be applicable to the installation and, therefore, has been included in the operating permit.

8. 10 CSR 10-6.250, *Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements*

This rule has been included in the operating permit because the rule is a core permit requirement.

9. 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

This rule had not been created at the time of the initial application; however, it has been determined to be applicable to the installation and, therefore, has been included in the operating permit. This rule will no longer be applicable to this installation when the current version (May 30, 2004) of this rule is incorporated into the SIP.

10. 10 CSR 10-6.280, *Compliance Monitoring Usage*

On December 5, 2001, the Air Pollution Control Program received a letter from EPA Region VII stating EPA determined that the language in the State Implementation Plan regarding credible evidence is an applicable requirement and must be included in each Title V operating permit. On July 2, 2002, the Air Pollution Control Program responded to EPA Region VII and agreed to include 10 CSR 10-6.280, *Compliance Monitoring Usage*, in the Core Permit Requirements Section of the Title V operating permit to address the issue.

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

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

1. St. Louis City Ordinances Nos. 50163, 55293, 59270, 60023, 60629, and 64749

These ordinances were reviewed and considered at the time of the application for this permit. Since that time, these ordinances have been repealed and replaced with St. Louis City Ordinance No. 65645. The only section of Ordinance 65645 that corresponds to a rescinded ordinance included in the State SIP and, therefore, federally enforceable is Section 15 – Open Burning Restrictions. This section is the only section exclusively listed in this operating permit.

2. 10 CSR 10-5.090, *Restriction of Emission of Visible Air Contaminants*

This rule has been rescinded from the state rules and the Federal SIP on March 30, 2001. It has been replaced by 10 CSR 10-6.220 and, therefore, is not cited in the operating permit.

3. 10 CSR 10-5.130, *Certain Coals to be Washed*

In the operating permit application, the installation indicated that they were subject to this regulation. However, the installation does not use coal for heating. This rule was not cited in the operating permit.

**Construction Permit Revisions**

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

There are no construction permits associated with this installation

#### **NSPS Applicability**

1. 40 CFR Part 60, Subpart D, Da, Db, nor Dc applies to the steam generation unit at this installation since the steam generation unit has a maximum heat input that is less than the applicability thresholds of these various subparts.
2. 40 CFR Part 60, Subpart K, Ka nor Kb applies to any of the storage tanks located at this installation. The largest VOL storage tanks at this installation are 10,500 gallons. These tanks at this installation all have capacities smaller than required capacities for applicability to these subparts.

#### **MACT Applicability**

1. 40 CFR Part 63, Subpart HHHHH, *National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing*  
This rule is applicable to adhesive manufacturing, which is this installation's primary business. However, in this permit the installation has requested a federally enforceable limit on the Hazardous Air Pollutant (HAP) emissions from the installation. Permit Condition PW002 restricts the installation's emissions to less than 25 tons/yr of any combination of HAPs and less than 10 tons/yr of any individual HAP. The installation requested this limitation to be included in the Part 70 Operating Permit prior to the compliance date of the MACT, which is December 11, 2006. Upon issuance of the operating permit this installation will not be applicable to this regulation, since the installation will not be classified as major for HAP emissions, as defined in section 112(a) of the Clean Air Act (CAA).
2. 40 CFR Part 63, Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*  
This rule is applicable to any installation which operates an industrial, commercial, or industrial boiler that is classified as major for HAPs. However, in this permit the installation has requested a federally enforceable limit on the Hazardous Air Pollutant (HAP) emissions from the installation. Permit Condition PW002 restricts the installation's emissions to less than 25 tons/yr of any combination of HAPs and less than 10 tons/yr of any individual HAP. The installation requested this limitation to be included in the Part 70 Operating Permit prior to the compliance date of the MACT, which is September 13, 2007. Upon issuance of the operating permit this installation will not be applicable to this regulation, since the installation will not be classified as major for HAP emissions, as defined in section 112(a) of the Clean Air Act (CAA).

#### **NESHAP Applicability**

1. 10 CSR 10-6.080, *Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos*  
This regulation applies to the installation because of the renovation and demolition sections of the subpart which makes this regulation applicable to all sources. It is included as a core permit requirement.

#### **CAM Applicability**

The installation does not have any emission units that are applicable to any emission limitations or standards that were proposed by the EPA administrator after November 15, 1990 pursuant to section 111 or 112 of the Clean Air Act. Therefore, CAM would not apply to this installation.

**Other Regulatory Determinations**

1. 10 CSR 10-5.030, *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*

For 10 CSR 10-5.030, emission limitations were calculated as follows.

The PM emission limitation for new sources (installed after February 15, 1979 ) is 0.40 pounds per million BTUs of heat input if the total heat input at the installation is less than ten (10) million BTUs per hour. The only indirect heating unit at the installation is a 2.219 million BTUs per hour boiler, so the total heat input at the installation is 2.219 million BTUs per hour. The installation operates the following fuel burning equipment used for indirect heating:

**Natural Gas Burning Indirect Heating Sources**

Emission Unit	Heat Input (MMBtu/hr)	Maximum Hourly Design Rate (MMCF/hr)	PM Emission Factor * (lb/MMCF)	PM Potential Emission Rate (lb/MMBtu)	PM Allowable Emission Rate (lb/MMBtu)
Natural Gas Boiler	2.219	0.0022	7.6	0.0075	0.40

\*AP-42, Section 1.4 Natural Gas Combustion

2. 10 CSR 10-5.390, *Control of Emissions from Manufacture of Paints, Varnishes, Lacquers, Enamels and Other Allied Surface Coating Products*

Mid-West Industrial Chemical Company does not have any varnish cooking operations or polymerization operations of synthetic varnish or resins, therefore all sections of this rule pertaining to these operations were excluded from Permit Condition PW002. Also excluded were the record keeping requirements in section (6)(B), since the installation does not utilize any add-on control technology such as condensers or thermal oxidizer. This installation is required to keep all records for five (5) years rather than the two (2) years stated in this rule because in 10 CSR 10-6.065(6)(C)1.C.(II)(b) of the Operating Permit rule it requires all record keeping requirements in the Part 70 Operating Permit to be retained for a five (5) year period. This installation has never submitted a control plan as required in section (5)(A) of this rule, since they will become applicable to this rule upon issuance of the Part 70 Operating Permit. The installation is only required to use covers on production tanks and have conservation vents and bottom filling capabilities on tanks storing VOC with a vapor pressure greater than or equal to 10 kPa. The installation has reported in the EIQs for the last several years that they use bottom filling and conservation vents on all VOC storage tanks at the installation and the mixing tanks at the installation are all enclosed tanks. This information in the EIQ can be accepted as a control plan for compliance with this rule, since no add-on control technology requiring testing for operating parameters is needed to comply with this rule.

3. 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*

This rule is applicable to the 2.219 MMBtu/hr natural gas boiler (EU0010) but based on a decision/agreement between EPA Region VII, Air Pollution Control Program Enforcement, and Air Pollution Control Program Permitting Section, 10 CSR 10-6.220 is not being included in Title V permits for natural gas combustion units because by the nature of the fuel no opacity exceedances would ever be expected under normal operating conditions.

4. 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

This rule applies to the Natural Gas Boiler (EU0010). This boiler uses only pipeline grade natural gas as a source of fuel and has a maximum heat input less than 10 MMBTU/hr. Compliance with this rule is to be shown either from stack testing or by proving the sulfur content is less than 0.5%. The boilers at this installation only burn natural gas and would never be expected to exceed the emission limits of this rule due to the low emissions of sulfur compounds from natural gas combustion.

5. 10 CSR 10-6.400, *Restriction of Particulate Matter from Industrial Processes*

The installation operates a rubber grinder used to break up large pieces of rubber into small particles of rubber that is mixed into adhesive batches. This grinder is vented to a baghouse. The potential to emit for the rubber grinder based on the maximum design capacity of the unit is less than 0.5 lbs per hour of particulate matter (PM). The calculation showing this is as follows:

MHDR x EF = Emissions (lbs/hr)

MHDR (2003 EIQ) = 0.007 tons/hr

EF (SCC 30101402 FIRE 6.23) = 17.0 lbs PM/ton

$0.007 \times 17.0 = 0.12$  lbs/hr of PM

Per 10 CSR 10-6.400(1)(B)11, emission units with the potential to emit less than 0.5 lbs per hour PM are exempt from the requirements of this rule. Therefore, this unit is not applicable to the provisions of this rule.

**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 APCP'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 APCP a schedule for achieving compliance for that regulation(s).

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