

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Matt Blunt, Governor • Doyle Childers, Director

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NOV - 9 2006

CERTIFIED MAIL, 70001670000099940712
RETURN RECEIPT REQUESTED

Mr. Bruce Hershock, Facility Manager
Caterpillar, Inc. – High Performance Molded Parts
2416 Mid-America Industrial Drive
Boonville, MO 65233

Re: Caterpillar, Inc. – High Performance Molded Parts, 053-0019
Permit Number: **OP2006-080**

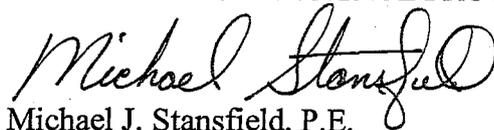
Dear Mr. Hershock:

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

Should you have any questions or need additional information, please contact the Air Pollution Control Program at (573) 751-4817, or you may write to the Department of Natural Resources' Air Pollution Control Program, PO Box 176, Jefferson City, MO 65102. Thank you for your time.

Sincerely,

AIR POLLUTION CONTROL PROGRAM


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

MJS: jdk

Enclosures

c: Ms. Tamara Freeman, US EPA Region VII
Northeast Regional Office
PAMS File: 2009-06-056



INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2006-080
Expiration Date: NOV - 8 2011
Installation ID: 053-0019
Project Number: 2006-09-056

Installation Name and Address

Caterpillar, Inc. – High Performance Molded Products
2416 Mid-America Industrial Drive
Boonville, MO 65233
Cooper County

Parent Company's Name and Address

Caterpillar, Inc.
100 N.E. Adams
Peoria, IL 61629

Installation Description:

Caterpillar Inc. – High Performance Molded Products is an engineered rubber and plastics manufacturer located in Boonville, Missouri. Raw material (rubber and plastic) are molded and pressed in conjunction with steel, adhesives, and coatings. Process operations include two (2) spray paint booths, a natural gas drying oven, two (2) natural gas fired boilers, plastic and rubber injection molding machines, electric cure ovens, presses, grit blast equipment and material (silica, carbon black, rubber, and plastics) handling equipment.

NOV - 9 2006

Effective Date



Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Caterpillar Inc. - High Performance Molded Products is an engineered rubber and plastics manufacturer located in Boonville Missouri. Raw material (rubber and plastic) are molded and pressed in conjunction with steel, adhesives, and coatings. Process operations include two (2) spray paint booths, a natural gas drying oven, two (2) natural gas fired boilers, plastic and rubber injection molding machines, electric cure ovens, presses, grit blast equipment and material (silica, carbon black, rubber, and plastics) handling equipment. The installation has the potential to be a major source of Hazardous Air Pollutants (HAP).

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2005	3.11	0.01	1.53	27.49	1.29	0.06	--
2004	4.75	0.01	1.60	30.4	1.34	0.03	--
2003	3.11	0.01	2.02	24.6	1.35	0.01	--
2002	2.74	0.01	1.99	25.0	1.38	0.02	0.01
2001	1.08	0.01	1.98	24.9	1.57	0.04	--

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit	
EU0010	Adhesive Paint Booth	EP-01
EU0040	Silica/Carbon Black Transfer	EP-05
EU0050	Rubber Mixing	EP-06
EU0060	Mold Cleaning Baking Soda Blaster	EP-21

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source	
Two (2) 100-HP Natural Gas Boilers, 4.35 MMBtu/hr each	EP-03
Clutch Core-Chemical Weight/Blend	EP-13
Clutch Core Rubber Mix and Granulate	EP-14
Clutch Core Grit Blast	EP-15
Two (2) Clutch Disk Electric Curing Ovens	EP-16
Clutch Disk Molding	EP-17
Rubber Lubricant Spray	EP-20

<u>Description of Emission Source</u>	<u>2004 EIQ Reference #</u>
Nine (9) Plastic Injection Molding Machines & Four (4) Electric Post Cure Ovens	EP-22
Twelve (12) Rubber Injection Molding Machines & Four (4) Electric Post Cure Ovens	EP-23
Twenty-three (23) Presses & One (1) Electric Cure Oven	EP-24
Natural Gas Drying Oven, MHDR = 0.216 MMBtu/hr	EP-02
Slip Seal Adhesive Paint Booth	EP-04

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Missouri Department of Natural Resources Construction Permit #1291-008
- 2) Missouri Department of Natural Resources Construction Permit #0893-031
- 3) Missouri Department of Natural Resources Construction Permit #0295-001
- 4) Missouri Department of Natural Resources Construction Permit #0198-002
- 5) Missouri Department of Natural Resources Construction Permit #042002-007
- 6) Missouri Department of Natural Resources Construction Permit #102003-020
- 7) Missouri Department of Natural Resources Construction Permit #122004-011

II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW001
10 CSR 10-6.060 Construction Permits Required
Construction Permit #122004-011, Issued December 23, 2004

Operating Limitation:

- 1) **Superseding Condition**
The conditions of construction permit #122004-011 supersede all special conditions found in the previously issued construction permits (Permit Numbers 1291-008, 0893-031 and 0295-001) from the Air Pollution Control Program. [Special Condition 1]
- 2) **Removal of Equipment**
Caterpillar Inc. - High Performance Molded Products shall remove the following emission points and render the equipment inoperable: [Special Condition 2]

Emission Point ID	Description
EP-09	Wheel Grit Blast
EP-10	Wheel Adhesive Paint Booth
EP-11	Filter Mold Adhesive Application
EP-12	Miscellaneous Parts - Steel Painting
EP-18	Wheel Protective Painting
EP-19	Rust Preventative Painting

Reporting/Monitoring/Recordkeeping:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which the records indicate that the source exceeded the emission limitation.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

PERMIT CONDITION PW002
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:

- 1) The permittee shall emit, from the entire installation, less than 10 tons of any single hazardous air pollutant (HAP) and less than 25 tons of combined HAPs in any consecutive 12-month period.

Monitoring:

- 1) The permittee shall monitor the monthly amount and type of HAP containing materials used at the installation.

Recordkeeping:

- 1) The permittee shall record the monthly total of individual and combined HAP emissions from this installation. (See Attachment E and F)

- 2) These records shall be made immediately available for inspection to the Missouri Department of Natural Resources personnel upon request.
- 3) These records shall be kept on-site for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which the records indicate that the source exceeded the emission limitation.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV 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.

EU0010			
Adhesive Paint Booth			
Emission Unit #	General Description	Manufacturer/ Model #	EIQ Reference # (Year)
EU0010	Adhesive paint booth used to spray apply adhesive and coating onto steel parts; MHDR 0.0048 ton/hr; equipped with Columbus overspray collector fabric filter (CD-01) with 99% capture efficiency and 94.5% control efficiency; installed 1991	Binks Manufacturing Co./ Custom Built CPFF-10-10-T	EP-01 (2004)

<p>Permit Condition EU0010-001 10 CSR 10-6.400 Control of Emission of Particulate Matter From Industrial Processes</p>

Emission Limitation:

- 1) Particulate matter shall not be emitted from EU0010 in excess of 0.1 lb/hr.
- 2) This emission rate was calculated using the following equation:
 - a) For process weight rates of 60,000 lb/hr or less:

$$E = 4.10(P)^{0.67}$$
 Where:
 E = rate of emission in lb/hr
 P = process weight rate in ton/hr
- 3) The concentration of particulate matter in the exhaust gases shall not exceed 0.3 grain per standard cubic feet of exhaust gases.

Monitoring:

- 1) Booths equipped with mat/panel filters (EU0010) shall not be operated without a filter in place.
- 2) The filters shall be inspected for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
- 3) The filters shall be inspected each shift before spraying begins in a booth and after installation of a new filter.
- 4) The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters.

Recordkeeping:

- 1) The permittee shall maintain records of inspections of mat/panel filters when they occur.
 - a) All inspections, corrective actions, and instrument calibrations shall be recorded.
 - b) Attachment A contains a log including these recordkeeping requirements. This log, or an equivalent form created by the permittee, must be used to certify compliance with this requirement.
- 2) All records shall be kept on-site for a minimum of five (5) years and made available to the Missouri Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the permittee determined that the emission unit exceeded the limitation(s) listed above.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

EU0040			
Silica/Carbon Black Transfer			
Emission Unit #	General Description	Manufacturer/ Model #	EIQ Reference # (Year)
EU0040	Pneumatic transfer of carbon black & hydrated silica; MHDR 0.79 ton/hr; equipped with Dustex dust collector fabric filter (CD-05) with 99% capture efficiency and 98% control efficiency; installed 1992	Dynamic Air/ 105-100, 105-50	EP-05 (2004)

Permit Condition EU0040-001

10 CSR 10-6.220

Restriction of Emissions of Visible Air Contaminants

Emission Limitation:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20%.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

- 1) The permittee shall conduct opacity readings on emission unit EU0040 using the procedures contained in USEPA Test Method 22. 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. Readings are only required when the emission unit is operating 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 (8) 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 (2) weeks for a period of eight (8) 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.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (see Attachment 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 A)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment C)
- 4) Attachments A, B and C contain logs including these recordkeeping requirements. These logs, or equivalent forms created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available to the Missouri Department of Natural Resources' personnel upon request.
- 6) All records shall be maintained for five (5) years.

Reporting:

- 1) The permittee shall report to the 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) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

Permit Condition EU0040-002

10 CSR 10-6.400

Control of Emission of Particulate Matter From Industrial Processes

Emission Limitation:

- 1) Particulate matter shall not be emitted from EU0040 in excess of 3.5 lb/hr.
- 2) This emission rate was calculated using the following equation:
 - a) For process weight rates of 60,000 lb/hr or less:
$$E = 4.10(P)^{0.67}$$

Where:
E = rate of emission in lb/hr
P = process weight rate in ton/hr
- 3) The concentration of particulate matter in the exhaust gases shall not exceed 0.3 grain per standard cubic feet of exhaust gases.

Monitoring:

- 1) The dust collector (CD-05) shall be maintained such that the pressure drop remains in the normal operating range of 2 to 8 inches of water whenever the emission unit is in operation. A pressure drop reading outside of the normal range may be observed for a period following the installation of a new bag.
- 2) All instruments and control equipment shall be calibrated, maintained, and operated according to the manufacturer's specifications and recommendations.
- 3) Check and document the dust collector pressure drop daily, whenever the emission unit is in operation. If the pressure drop falls out of the normal operating range, corrective action shall be taken as soon as practicable but within eight hours to return the pressure drop to normal.
- 4) Check and document the cleaning sequence of the dust collector every six months.
- 5) Inspect bags for leaks and wear every six months.
- 6) Inspect all components that are not subject to wear or plugging, including structural components, housing, ducts and hoods every six months.

Recordkeeping:

- 1) The permittee shall document all pressure drop readings. (see Attachment D)
- 2) All inspections, corrective actions, and instrument calibration shall be recorded. (see Attachment A)
- 3) Attachments A and D contain logs including these recordkeeping requirements. These logs, or equivalent forms created by the permittee, must be used to certify compliance with this requirement

- 4) These records shall be made available to the Missouri Department of Natural Resources' personnel upon request.
- 5) All records shall be maintained for five (5) years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the permittee determined that the emission unit exceeded the emission limitation(s) and/or normal pressure drop range.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

EU0050 Rubber Mixing			
Emission Unit #	General Description	Manufacturer/ Model #	EIQ Reference # (Year)
EU0050	Rubber mixing; MHDR 0.79 ton/hr; equipped with Dustex dust collector fabric filter (CD-06) with 98% capture efficiency and 98% control efficiency; installed 1992	Farrel Corporation/3D Banbury Mixer Body	EP-06 (2004)

Permit Condition EU0050-001

10 CSR 10-6.220

Restriction of Emissions of Visible Air Contaminants

Emission Limitation:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20%.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

- 1) The permittee shall conduct opacity readings on emission unit EU0050 using the procedures contained in USEPA Test Method 22. 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. Readings are only required when the emission unit is operating 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 (8) 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 (2) weeks for a period of eight (8) 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.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (see Attachment 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 A)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment C)
- 4) Attachments A, B and C contain logs including these recordkeeping requirements. These logs, or equivalent forms created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available to the Missouri Department of Natural Resources' personnel upon request.
- 6) All records shall be maintained for five (5) years.

Reporting:

- 1) The permittee shall report to the 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) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

**Permit Condition EU0050-002
10 CSR 10-6.400**

Control of Emission of Particulate Matter From Industrial Processes

Emission Limitation:

1. Particulate matter shall not be emitted from EU0050 in excess of 3.50 lb/hr.
2. This emission rate was calculated using the following equation:
 - a) For process weight rates of 60,000 lb/hr or less:
$$E = 4.10(P)^{0.67}$$

Where:
E = rate of emission in lb/hr
P = process weight rate in ton/hr
3. The concentration of particulate matter in the exhaust gases shall not exceed 0.3 grain per standard cubic feet of exhaust gases.

Monitoring:

- 1) The dust collector (CD-06) shall be maintained such that the pressure drop remains in the normal operating range of 3 to 9 inches of water whenever the emission unit is in operation. A pressure drop reading outside of the normal range may be observed for a period following the installation of a new bag.
- 2) All instruments and control equipment shall be calibrated, maintained, and operated according to the manufacturer's specifications and recommendations.
- 3) Check and document the dust collector pressure drop daily, whenever the emission unit is in operation. If the pressure drop falls out of the normal operating range, corrective action shall be taken as soon as practicable but within eight hours to return the pressure drop to normal.
- 4) Check and document the cleaning sequence of the dust collector every six months.
- 5) Inspect bags for leaks and wear every six months.
- 6) Inspect all components that are not subject to wear or plugging, including structural components, housing, ducts and hoods every six months.

Recordkeeping:

- 1) The permittee shall document all pressure drop readings. (see Attachment D)
- 2) All inspections, corrective actions, and instrument calibration shall be recorded. (see Attachment A)
- 3) Attachments A and D contain logs including these recordkeeping requirements. These logs, or equivalent forms created by the permittee, must be used to certify compliance with this requirement
- 4) These records shall be made available to the Missouri Department of Natural Resources' personnel upon request.
- 5) All records shall be maintained for five (5) years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the permittee determined that the emission unit exceeded the emission limitation(s) and/or normal pressure drop range.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

EU0060			
Mold Cleaning Baking Soda Blaster			
Emission Unit #	General Description	Manufacturer/ Model #	EIQ Reference # (Year)
EU0060	A hand held grit blast unit utilizing baking soda; MHDR 0.025 ton/hr; equipped with dust collector (CD-21) with 99% capture efficiency and 98% control efficiency and which discharges within building; installed 1997	Armex/125X	EP-21 (2004)

Permit Condition EU0060-001

10 CSR 10-6.060

Construction Permits Required

APCP Construction Permit #0198-002

Operating Limitation:

The dust collector (CD-21) must be in use at all times when EU0060, Mold Cleaning Baking Soda Blaster, is in operation, and shall be operated and maintained in accordance with the manufacturer's specifications. The cartridges shall be made of fibers appropriate for operating conditions expected to occur (e.g. temperature limits, acidic and alkali resistance, abrasion resistance, etc.). [Special Condition 1]

Monitoring/Recordkeeping:

- 1) Caterpillar Inc. shall maintain an operating and maintenance log for the collector which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair action, and replacements, etc. (see Attachment A) [Special Condition 2]

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the permittee determined that the emission unit exceeded the emission limitation(s) and/or normal pressure drop range.

- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

IV. Core Permit Requirements

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

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

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 3) The fees shall be 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 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

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

- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-3.030 Open Burning Restrictions

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

10 CSR 10-3.090 Restriction of Emission of Odors

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

This requirement is not federally enforceable.

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

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

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

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the 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.

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

10 CSR 10-6.280 Compliance Monitoring Usage

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

- ii) 10 CSR 10-6.040, “Reference Methods”;
- iii) 10 CSR 10-6.070, “New Source Performance Standards”;
- iv) 10 CSR 10-6.080, “Emission Standards for Hazardous Air Pollutants”; or
- b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

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

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

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

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

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

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

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

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

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

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

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

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

None.

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

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the 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 semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions

limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

- a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

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

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

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

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

This permit may be reopened for cause if:

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

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

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

VI. Attachments

Attachments follow.

Attachment C
Method 9 Opacity Emissions Observations

This recordkeeping sheet or an equivalent form may be used for the recordkeeping requirements of 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*.

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

Readings ranged from _____ to _____ % opacity.

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

Signature of Observer _____

STATEMENT OF BASIS

Voluntary Limitations

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

Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, received September 19, 2006;
- 2) 2004 Emissions Inventory Questionnaire, received April 1, 2005; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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.

10 CSR 10-6.100, *Alternate Emission Limits*

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

Other Air Regulations Determined Not to Apply to the Operating Permit

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

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

This rule was marked as applicable in the permit application. However, combustion units that use exclusively pipeline grade natural gas, as defined in 40 CFR 72.2, are exempt from this rule.

Construction Permit Revisions

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

- 1) APCP Construction Permit #1291-008
The special conditions of this permit were superseded by construction permit #122004-011.
- 2) APCP Construction Permit #0893-031
The special conditions of this permit were superseded by construction permit #122004-011.
- 3) APCP Construction Permit #0295-001
The special conditions of this permit were superseded by construction permit #122004-011.
- 4) APCP Construction Permit #042002-007

In the Applicable Requirement section of this permit, it is stated that the injection molding machines are subject to 10 CSR 10-6.400. However, the individual emission units each have a potential emission rate of less than 0.5 lb/hr of particulate matter. Consequently, these emission units are exempt from 10 CSR 10-6.400 according to §(1)(B)(11).

5) APCP Construction Permit #122004-011

In the Applicable Requirement section of this permit, it is stated that the injection molding machines are subject to 10 CSR 10-6.400. However, the individual emission units each have a potential emission rate of less than 0.5 lb/hr of particulate matter. Consequently, these emission units are exempt from 10 CSR 10-6.400 according to §(1)(B)(11).

New Source Performance Standards (NSPS) Applicability

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

This standard applies to boilers with maximum design heat input capacity greater than or equal to ten (10) MMBtu/hr. The boilers at this facility are less than ten (10) MMBtu/hr and are therefore not subject to this standard according to §60.40c(a).

Maximum Available Control Technology (MACT) Applicability

40 CFR Part 63, Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*

The boilers and gas drying oven at Caterpillar Inc. - High Performance Molded Products meet the definition of small gaseous fuel category and are not subject to any requirements in subpart DDDDD or in Subpart A of Part 63 according to §63.7506(c)(4).

40 CFR Part 63, Subpart MMMM, *Surface Coating of Miscellaneous Metal Parts and Products*

PW002 limits this installation to less than major source thresholds for hazardous air pollutants. Therefore, this installation is not subject to this MACT

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

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

This standard applies to the installation because of the renovation and demolition parts of the subpart, which make the subpart applicable to all sources. It is included as a core permit requirement.

Other Regulatory Determinations

10 CSR 10-3.060, *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*

This rule was not applied to the natural gas drying oven (EU0020) or the two (2) 100-hp natural gas boilers since these units combust only natural gas and it is highly unlikely that emissions from these units will result in an exceedance of 10 CSR 10-3.060.

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

This rule applies to EU0010. The calculations below verify compliance for both the PM Emission Rate and the PM Concentration provided that the required control device (CD-01) is in operation and working properly.

EU0030 is not subject to this rule because, as the calculations below verify, EU0030 has the uncontrolled potential to emit less than 0.5 lb/hr of particulate matter and is exempt according to §(1)(B)11.

PM Emission Rate Compliance

$$\text{Emission Rate (lb/hr)} = \text{MHDR (ton/hr)} * (\% \text{ solids}/100 * 2000 \text{ lb/ton}) * (1 - \text{Transfer Eff}/100) * (1 - (\text{Overall Control Eff}/100))$$

EU ID	Associated Equip.	MHDR (ton/hr)	% solids	Capture Efficiency (%)	Control Efficiency (%)	Transfer (%)	Potential Uncontrolled Emission Rate (lb/hr)	Potential Controlled Emission Rate (lb/hr)	Allowable Emission Rate (lb/hr)
EU0010	Adhesive Paint Booth	0.0048	39	99	94.5	50	1.87	0.1	0.1
EU0030	Slip Seal Adhesive Paint Booth	0.00079	24	99	94.5	50	0.2	EXEMPT PM < 0.5 lb/hr	

PM Concentration Compliance

$$\text{Emission rate (gr/dscf)} = \text{Emission Rate (lb/hr)} * 7000 \text{ (grains/lb)} / \text{Stack Flow Rate (SCFM)} / 60 \text{ (min/hr)}$$

Flow rates converted from actual to standard conditions using the ideal gas law.

EU ID	Associated Equip.	Potential Controlled PM Emission Rate (lb/hr)	Stack Temp °F	Stack Flow Rate		Potential Concentration (gr/scf)	Allowable Concentration (gr/scf)
				ACFM	SCFM		
EU0010	Adhesive Paint Booth	0.1	80	124,565	121,797	0.00001	0.3

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

This rule applies to EU0040 and EU0050. The calculations below verify compliance for both the PM Emission Rate and the PM Concentration provided that the required control devices (CD-05 and CD-06) are in operation and working properly:

PM Emission Rate Compliance

$$\text{Emission Rate (lb/hr)} = \text{MHDR (ton/hr)} * \text{Emission Factor (lb/ton)} * (1 - (\text{Overall Control Eff}/100))$$

EU ID	Associated Equip.	MHDR (ton/hr)	Emission Factor (lb/ton)	Emission Factor Source	Capture Efficiency (%)	Control Efficiency (%)	Potential Controlled PM Emission Rate (lb/hr)	Allowable PM Emission Rate (lb/hr)
EU0040	Silica/Carbon Black Transfer	0.79	20	2004 EIQ - mass balance	99	98	0.5	3.5
EU0050	Rubber Mixing	0.79	18.44	2004 EIQ - mass balance	98	98	0.6	3.5

PM Concentration Compliance

$$\text{Emission rate (gr/dscf)} = \text{Emission Rate (lb/hr)} * 7000 \text{ (grains/lb)} / \text{Stack Flow Rate (SCFM)} / 60 \text{ (min/hr)}$$

Flow rates converted from actual to standard conditions using the ideal gas law.

EU ID	Associated Equip.	Potential Controlled PM Emission Rate (lb/hr)	Stack Temp °F	Stack Flow Rate		Potential Concentration (gr/scf)	Allowable Concentration (gr/scf)
				ACFM	SCFM		
EU0040	Silica/Carbon Black Transfer	0.5	80	3,700	3,618	0.0152	0.3
EU0050	Rubber Mixing	0.6	80	10,776	10,537	0.0064	0.3

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

This rule was not applied to the rubber injection molding machines (EP-23) because, as the table below verifies, each unit has the uncontrolled potential to emit less than 0.5 lb/hr of particulate matter and is therefore exempt according to §(1)(B)11.

EU ID	Associated Equip.	Process Weight Rate (ton/hr)	PM Emission Factor (lb/ton)	Emission Factor (EF) Reference	Potential Uncontrolled Emission Rate (lb/hr)
EP-23	Rubber Injection Molding Machine #7a	0.04	10	2003 Intermediate Permit Application	0.4
	Rubber Injection Molding Machine #7b	0.04	10	2003 Intermediate Permit Application	0.4
	Rubber Injection Molding Machine #7c	0.04	10	2003 Intermediate Permit Application	0.4
	Rubber Injection Molding Machine #7d	0.04	10	2003 Intermediate Permit Application	0.4
	160 Ton Rubber Injection Molding Machine #1	0.0025	10	2003 Intermediate Permit Application	0.03
	160 Ton Rubber Injection Molding Machine #2	0.0025	10	2003 Intermediate Permit Application	0.03
	160 Ton Rubber Injection Molding Machine #3	0.0025	10	2003 Intermediate Permit Application	0.03
	160 Ton Rubber Injection Molding Machine #4	0.0025	10	2003 Intermediate Permit Application	0.03
	160 Ton Rubber Injection Molding Machine #5	0.0025	10	2003 Intermediate Permit Application	0.03
	160 Ton Rubber Injection Molding Machine #6	0.0025	10	2003 Intermediate Permit Application	0.03
	700 Ton Rubber Injection Molding Machine	0.027	10	2003 Intermediate Permit Application	0.3
	700 Ton Rubber Injection Molding Machine	0.027	10	2003 Intermediate Permit Application	0.3

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

This rule was not applied to the following equipment because each unit vents to control devices that discharge inside the facility building(s). Therefore, the emissions are considered fugitive and are exempt according to §(1)(B)7.

Description of Emission Source	2004 EIQ Reference #
EU0060 Mold Cleaning Baking Soda Blaster	EP-21
Clutch Core Chemical Weight/Blend	EP-13
Clutch Core Rubber Mix and Granulate	EP-14

Clutch Core Grit Blast EP-15
Twenty-three (23) Presses & One (1) Electric Cure Oven EP-24

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

This rule was not applied to the following equipment because particulate matter is not emitted from the equipment according to the 2004 EIQ.

<u>Description of Emission Source</u>	<u>2004 EIQ Reference #</u>
Clutch Disk Molding	EP-17
Rubber Lubricant Spray	EP-20
Nine (9) Plastic Injection Molding Machines & Four (4) Electric Post Cure Ovens	EP-22

EU0020 & EU0030

The current operating permit OP2005-035 list EU0020 and EU0030 as emission units with limitations. EU0020 is a natural gas drying oven that combust only natural gas and it is highly unlikely that emissions from this unit will result in an exceedance of 10 CSR 10-3.060. EU0030 is a slip seal adhesive paint booth whose total uncontrolled potential to emit is 0.2 pounds/hour which is less than 0.5 so it is exempt from 10 CSR 10-6.400. Therefore, this permit will be without EU0020 and EU0030.

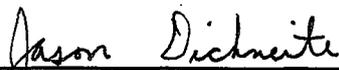
Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

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

Prepared by:



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