



## PART 70 PERMIT TO OPERATE

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

**Operating Permit Number:** OP2008-033

**Expiration Date:** JUL - 2 2013

**Installation ID:** 019-0047

**Project Number:** 2003-09-055

**Installation Name and Address**

University of Missouri - Columbia  
8 Research Park Development Building  
Columbia, MO 65211  
Boone County

**Parent Company's Name and Address**

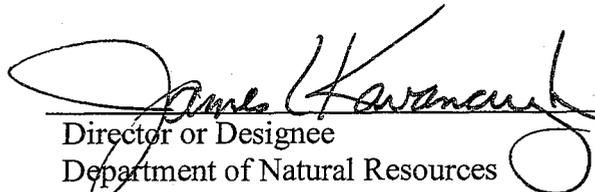
The Curators of the University of Missouri  
8 Research Park Development Building  
Columbia, MO 65211

**Installation Description:**

University of Missouri - Columbia is a public university located in Boone County. The installation includes the Main Campus (excluding the Power Plant), University Hospital, Columbia Regional Hospital Ellis Fischel Cancer Center and Quarterdeck facilities. The installation's emission sources include a waste incinerator, electrical generators, veterinary diagnostic incinerator, storage tanks, steam generation, paint booths and parts washers.

JUL - 3 2008

\_\_\_\_\_  
Effective Date

  
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Director or Designee  
Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

University of Missouri - Columbia is a public university located in Boone County. The installation includes the Main Campus (excluding the Power Plant), University Hospital, Columbia Regional Hospital Ellis Fischel Cancer Center and Quarterdeck facilities. The installation's emission sources include a waste incinerator, electrical generators, veterinary diagnostic incinerator, storage tanks, steam generation, paint booths and parts washers.

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)
2006	--	--	--	5.35	--	--	--
2005	--	--	--	5.31	--	--	--
2004	--	--	--	4.23	--	--	--
2003	0.36	0.23	4.49	8.68	1.55	--	--
2002	0.42	0.33	4.05	8.15	1.46	--	--

### 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	EIQ EP#
EU0010	Incinerator	EP-01
EU0250	Gustin Parts Washer	EP-43
EU0260	Hospital Parts Washer	EP-49
EU0270	Engineering Parts Washer	EP-50
EU0280	Quarterdeck Paint Booth	EP-01Q
EU0290	General Services Paint Booth	EP-69
EU0300	Veterinary Diagnostic Incinerator	EP-90
EU0310	Three (3) 14.6 MMBtu/hr Boilers	EP-05E
EU0320	Two (2) 12.6 MMBtu/hr Boilers	EP-01CRH

### 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	EIQ EP#
Hospital 4,000-gallon Underground Fuel Tank	EP-02
Hospital Emergency Generator #1	EP-04
Hospital Emergency Generator #2	EP-05
Hospital Emergency Generator #3	EP-06
Hospital Emergency Generator #4	EP-07
Professional Building Steam Heat Boiler, natural gas-fired, 2.1 MMBtu/hr	EP-10
Fine Arts Annex Hot Water Boiler, natural gas-fired, 0.63 MMBtu/hr	EP-12

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Research Park Dev. Building Hot Water Boiler, natural gas-fired, 2.1 MMBtu/hr	EP-13
Lefevre Hall Emergency Generator	EP-14
Animal Science Research Center Emergency Generator #1	EP-18
ASRC 565-gallon Diesel Storage Tank	EP-19
Animal Science Research Center Emergency Generator #2	EP-20
Telecommunications Emergency Generator	EP-21
Telecommunication Building Underground Tank	EP-22
Clydesdale Hall Emergency Generator	EP-25
Dalton Research Center Emergency Generator	EP-27
Research Reactor Emergency Generator	EP-29
Katolight Portable Emergency Generator	EP-31
Kato Gen Set Portable Emergency Generator	EP-33
Clark Hall Emergency Generator, natural gas-fired	EP-36
General Services 12,250-gallon Unleaded Fuel Tank, installed 1994	EP-37
General Stores 12,500-gallon Ethanol 10% Tank, installed 1994	EP-38
Jet Copter Underground Storage Tank, installed 1998	EP-39
Research Reactor 1,600-gallon Sulfuric Acid Tank, installed 1998	EP-40
Hospital Critical Care 4,000-gallon Underground Diesel Tank, installed 1999	EP-53
Telecommunications North Emergency Generator	EP-55
Faurot Field Emergency Generator, natural gas-fired	EP-56
Hospital Emergency Generator #6	EP-58
Hospital Emergency Generator #7	EP-59
Rock Quarry Center Emergency Generator	EP-60
Anagan Ceramics Kiln, wood-fired, 0.875 MMBtu/hr	EP-61
Catenary Arch Style Ceramics Kiln, wood-fired, 0.875 MMBtu/hr	EP-62
Sprung Arch Style Ceramics Kiln, natural gas-fired, 0.875 MMBtu/hr	EP-63
Box Style Ceramics Kiln, natural gas-fired, 1.0 MMBtu/hr	EP-64
Hitt Street Parking Garage Boiler, natural gas-fired, 0.3 MMBtu/hr	EP-65
Locust Street Building Boiler, natural gas-fired, 1 MMBtu/hr	EP-66
Poultry Nutrition Building Boiler, natural gas-fired, 0.3 MMBtu/hr	EP-67
Museum Support Building Boiler, natural gas-fired, 0.75 MMBtu/hr	EP-68
General Services Parts Washer	EP-71
Soil Vapor Evaporation System	EP-74
Life Sciences Emergency Generator #1	EP-75
Life Sciences Emergency Generator #2	EP-76
ABNR/Tucker/Ag Emergency Generator	EP-77
Ag Engineering Shop Parts Washer	EP-78
Basketball Arena Emergency Generator	EP-79
Basketball Arena 925-gallon Diesel Storage Tank	EP-80
Research Park Dev. Building Space Heating, natural gas-fired, 0.002 MMBtu/hr	EP-81
Fine Arts, #1 Parts Washer	EP-82
Fine Arts, #2 Parts Washer	EP-83
Life Science Building 204-gallon Diesel Tank, associated with EP-75	NA
Life Science Building 450-gallon Diesel Tank, associated with EP-76	NA
ABNR/Tucker/Ag Building 300-gallon Diesel Tank, associated with EP-77	NA
Underground Fuel Storage Tank (North)	EP-01E
Underground Fuel Storage Tank (South)	EP-02E

Electrical Generator – Diesel	EP-03E
Six (6) Emergency Generators	EP-04E
Fume Hood Exhaust	EP-06E
Emergency Generator – VAG – Diesel Fueled, 175 kW	EP-85
Emergency Generator – Hatch Hall – Diesel Fueled, 200 kW	EP-86
Emergency Generator – CSEB – Diesel Fueled, 350 kW	EP-87
Emergency Generator – Dalton – Natural Gas, 1.3 MMBtu/hr	EP-88
Emergency Generator – Schweitzer – Natural Gas, 0.8 MMBtu/hr	EP-89
Boiler #3 – Capital Region Hospital – Natural Gas, 3.4 MMBtu/hr	EP-02CRH
Boiler #4 – Capital Region Hospital – Natural Gas, 3.4 MMBtu/hr	EP-03CRH
Boiler #5 – Capital Region Hospital – Natural Gas, 1.5 MMBtu/hr	EP-04CRH
Boiler #6 – Capital Region Hospital – Natural Gas, 1.0 MMBtu/hr	EP-05CRH
Emergency Generator – Capital Region Hospital – Diesel Fueled, 11.4 MMBtu/hr	EP-06CRH
12,000 Gallon Diesel Storage Tank – Capital Region Hospital	EP-07CRH
15 Gallon Parts Washer	EP-08CRH
ETO Sterilizer – Bowles Lab	EP-91
ETO Sterilizer – Clydesdale Hall	EP-92
Two (2) 0.225 MMBtu/hr Natural Gas Boilers	EP-02Q

#### **DOCUMENTS INCORPORATED BY REFERENCE**

These documents have been incorporated by reference into this permit.

- 1) APCP Construction Permit #1181-003, issued October 30, 1981
- 2) APCP Construction Permit #0990-004, issued August 13, 1990, amended April 1, 1991
- 3) APCP Construction Permit #0697-024, issued June 4, 1997
- 4) APCP Construction Permit #0697-025, issued May 29, 1997
- 5) APCP Construction Permit #0299-013, issued January 26, 1999
- 6) APCP Construction Permit #042000-009, issued March 28, 2000
- 7) APCP Construction Permit #032002-002, issued February 7, 2002
- 8) APCP Construction Permit #012003-005, issued December 11, 2002
- 9) APCP Construction Permit #032003-028, issued March 21, 2003
- 10) APCP Construction Permit #112005-002, issued November 3, 2005
- 11) APCP Construction Permit #022007-011, issued February 22, 2007

## **I. 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.

None

## II. Emission Unit Specific Emission Limitations

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

<b>EU0010 – INCINERATOR</b>			
<b>Emission Unit</b>	<b>Description</b>	<b>Manufacturer/Model #</b>	<b>EIQ Reference #</b>
EU0010	Solid waste disposal incinerator: burns low level radioactive waste; heat input 2.5 MMBtu/hr; rated at 350 lb/hr; installed 1991	John Zink/A-35	EP-01

**PERMIT CONDITION EU0010-001**  
**10 CSR 10-6.060 Construction Permits Required**  
**Construction Permit #0990-004, issued August 13, 1990, amended April 1, 1991**

**Emission Limitations:**

- 1) This incinerator shall be operated in accordance with the manufacturer’s instructions and guidelines, to include preheating all chambers to the proper operating temperatures and the proper use of all burners to maintain proper operating temperatures. [\[CP #0990-004, Special Condition 1\]](#)
- 2) This incinerator shall have affixed to it a plate inscribed with a set of instructions which clearly sets forth in proper sequence the steps necessary to effect the satisfactory operation of the incinerator and the manufacturer’s or designer’s recommended burning rate in pounds of refuse per hour and the heat input of the burners in Btu’s hour. The plate shall be conspicuously located so as to be readily visible to the incinerator operator. [\[CP #0990-004, Special Condition 2\]](#)
- 3) The manufacturer’s instructions and guidelines of operation shall be available at the site at all times upon request along with a copy of construction permit #0990-004. [\[CP #0990-004, Special Condition 3\]](#)
- 4) The secondary chamber of this incinerator must be operated at a minimum of 1800°F at all times that waste is being combusted in the primary chamber, and this temperature must be maintained at least two (2) seconds downstream from the entrance to the secondary chamber. [\[CP #0990-004, Special Condition 4\]](#)
- 5) The secondary chamber temperature shall be recorded continuously whenever the unit is operating at a point two (2) seconds downstream from the entrance to the secondary chamber. The method of recording will be subject to program review and approval. The recordings shall be kept for a running 36 month period and made immediately available for review by Department of Natural Resources’ personnel upon verbal request. [\[CP #0990-004, Special Condition 5\]](#)
- 6) The secondary chamber must be at least 1800°F before combustion of waste in the primary chamber can occur. A mechanical (not manual) system of combustion (primary and secondary chamber burner operation) must be installed to ensure this. [\[CP #0990-004, Special Condition 6\]](#)
- 7) There must be a lockout mechanism which prohibits charging of waste between the manufacturer’s recommended burn cycle. Only a key lock override will be acceptable with the key being maintained in the possession of the on-duty supervisor. [\[CP #0990-004, Special Condition 7\]](#)

- 8) Operating personnel must have adequate training and knowledge of the operation of this incinerator. A trained operator must be on-duty whenever the incinerator is operating and available to deal with problems or questions that might arise. Training should include the manufacturer's standard operating procedures. [CP #0990-004, Special Condition 8]
- 9) Incinerator operation shall be automated to as great a degree as practicable to minimize operator interference with proper combustion control. [CP #0990-004, Special Condition 9]
- 10) Good engineering practice stack heights should be used being careful with emission stacks that are attached to the sides of the buildings. [CP #0990-004, Special Condition 10]

**PERMIT CONDITION EU0010-002**

**10 CSR 10-6.200 Hospital, Medical, Infectious Waste Incinerators**

**Note:** The permittee has elected to burn only pathological waste, low-level radioactive waste, and/or chemotherapeutic waste; therefore, the permittee is exempt from this rule with the exception of the recordkeeping and reporting requirements.

**Emission Limitation:**

The permittee shall burn only pathological waste, low-level radioactive waste, and/or chemotherapeutic waste in Incinerator (EU0010).

**Recordkeeping/Reporting:**

- 1) The permittee shall:
  - a) Notify the director of an exemption claim; and
  - b) Keeps records on a calendar-quarter basis of the periods of time when only pathological waste, low-level radioactive waste, and/or chemotherapeutic waste is burned.
- 2) All records shall be maintained for five (5) years.
- 3) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 4) 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 end of the month during which records indicate any deviations/exceedances of this permit condition.

**PERMIT CONDITION EU0010-003**

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

**Emission Limitations:**

- 1) Emissions from any new source operation shall not contain more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide.
- 2) Stack gasses shall not contain more than thirty-five milligrams (35 mg) per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.

- 3) 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.

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO <sub>2</sub> )	0.03 parts per million (ppm) (80 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ))	Annual arithmetic mean
	0.14 ppm (365 $\mu\text{g}/\text{m}^3$ )	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 $\mu\text{g}/\text{m}^3$ )	3-hour average not to be exceeded more than once per year
Hydrogen Sulfide (H <sub>2</sub> S)	0.05 ppm (70 $\mu\text{g}/\text{m}^3$ )	1/2-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 $\mu\text{g}/\text{m}^3$ )	1/2-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H <sub>2</sub> SO <sub>4</sub> )	10 $\mu\text{g}/\text{m}^3$	24-hour average not to be exceeded more than once in any 90 consecutive days
	30 $\mu\text{g}/\text{m}^3$	1-hour average not to be exceeded more than once in any 2 consecutive days

**Operational Limitation/Equipment Specifications:**

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

**Monitoring/Recordkeeping:**

Documentation supporting the fuel used is pipeline grade natural gas.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

EU0250 THROUGH EU0270 – PARTS WASHERS			
Emission Unit	Description	Manufacturer/ Model #	EIQ Reference #
EU0250	Gustin Parts Washer: Safety Kleen Premium Gold Solvent; 5 gallons; installed 1997	Safety Kleen/ 50000	EP-43
EU0260	Hospital Parts Washer: Safety Kleen Premium Gold Solvent; 9 gallons; installed 1997	Safety Kleen/ 51150	EP-49
EU0270	Engineering Parts Washer: Safety Kleen Premium Gold Solvent; 20 gallons; installed 1997	Safety Kleen	EP-50

**PERMIT CONDITION (EU0250 through EU0270)-001**  
**10 CSR 10-6.060 Construction Permits Required**  
**Construction Permit #0697-025, issued May 29, 1997**

**Reporting:**

If a continuing situation of demonstrated nuisance odors exists in violation of Missouri State Rule 10 CSR 10-3.090, *Restriction of Emission of Odors*, the Director may require the University of Missouri - Columbia to submit a corrective action plan within ten (10) days adequate to timely and significantly mitigate the odors. The University of Missouri - Columbia shall implement any such plan immediately upon its approval by the Director. Failure to either submit or implement such a plan shall be a violation of the permit. [CP #0697-025, Special Condition 1]

<b>EU0280 AND EU0290 – PAINT BOOTHS</b>			
Emission Unit	Description	Manufacturer/Model #	EIQ Reference #
EU0280	Quarterdeck Paint Booth: MHDR 18.5 gal/hr; equipped with filter; installed 2005	Binks/Model #7	EP-01Q
EU0290	General Services Paint Booth: MHDR 2.0 gal/hr; equipped with filter; installed 1997	Manufactured onsite	EP-69

**PERMIT CONDITION EU0280-001**  
**10 CSR 10-6.060 Construction Permits Required**  
**Construction Permit #112005-002, issued November 3, 2005**

**Emission Limitation/Operational Limitation:**

- 1) Curators of the University of Missouri shall emit less than 40 tons of Volatile Organic Compounds (VOCs) from the MU Quarterdeck paint booth (EU0280) in any consecutive 12-month period. [CP #112005-002, Special Condition 1(A)]
- 2) Curators of the University of Missouri shall control particulate matter emissions from the paint booth using filters as specified in the construction permit application. The filters shall be operated and maintained in accordance with the manufacturer’s specifications. Replacement filters shall be kept on hand at all time. [CP #112005-002, Special Condition 2]

**Monitoring/Recordkeeping:**

Attachment B or equivalent form approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 1(A). Curators of the University of Missouri shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used in this paint booth. [CP #112005-002, Special Condition 1(B)]

**Reporting:**

Curators of the University of Missouri shall report to the Air Pollution Control Program’s Enforcement Section, P. O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 1(B) indicate that the source exceeds the limitation of Special Condition Number 1(A). [CP #112005-002, Special Condition 1(C)]

**PERMIT CONDITION (EU0280 and EU0290)-002**  
**10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes**

**Emission Limitations:**

- 1) Particulate matter shall not be emitted from Quarterdeck Painting Booth (EU0280) in excess of 0.93 lb/hr.
- 2) Particulate matter shall not be emitted from General Services Painting Booth (EU0290) in excess of 0.50 lb/hr.
- 3) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 gr/scf.

**Monitoring:**

- 1) Booths equipped with mat/panel filters 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 on the premises of the installation calculations demonstrating compliance with this rule.
- 2) The permittee shall maintain records of the inspections of the filter including when they occur. Attachment J 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.
- 3) All records shall be maintained for five (5) years.
- 4) These records shall be made available immediately for inspection to the Department of Natural Resources personnel upon request.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

<b>EU0300 – VETERINARY DIAGNOSTIC INCINERATOR</b>			
Emission Unit	Description	Manufacturer/Model #	EIQ Reference #
EU0300	Veterinary Diagnostic Incinerator: capable of burning 0.4 tons of carcasses per hour; MHDR 5.6 MMBtu/hr; fired by natural gas	ThermTec/ Model A-8-P-S	EP-90

**PERMIT CONDITION EU0300-001**  
**10 CSR 10-6.060 Construction Permits Required**  
**Construction Permit #022007-011, issued February 22, 2007**

**Emission Limitation:**

The Veterinary Diagnostic Incinerator (EU0300) shall have opacity of less than ten percent (10%) at all times. [CP #022007-011, Special Condition 6]

**Operational Specifications:**

- 1) University of Missouri - Columbia will burn non-infectious animal bodies or body parts or no more than ten (10) percent (%) infectious animal bodies or body parts not in containers and non-infectious animal bodies or body parts or no more than 10% infectious animal bodies or body parts in containers not containing chlorine. [CP #022007-011, Special Condition 1]
- 2) University of Missouri - Columbia shall not open the door to the primary chamber until the burn cycle is complete and shall not charge any material during the burn cycle. [CP #022007-011, Special Condition 2]
- 3) The incinerator shall have a minimum combustion efficiency of 99.9% determined from the carbon dioxide concentration divided by the sum of the carbon monoxide and carbon dioxide concentrations. [CP #022007-011, Special Condition 4]
- 4) All incinerator operators shall attend a training program equivalent to that developed by the American Society of Mechanical Engineers (ASME), by the incinerator manufacturer or by an individual with more than one (1) year experience in the operation of the incinerator. The training shall include basic combustion theory, operating procedures, monitoring of combustion control parameters and all emergency procedures to be followed if the incinerator should malfunction or exceed operating parameters. [CP #022007-011, Special Condition 7]
- 5) The incinerator operator shall have the essential steps necessary for satisfactory operation of the incinerator readily available to him in an easy to read and follow manual. [CP #022007-011, Special Condition 8]

**Monitoring/Recordkeeping:**

- 1) University of Missouri – Columbia shall keep records on a calendar-quarter basis of the weight of infectious waste combusted, and the weight of all other wastes combusted at the incinerator. [CP #022007-011, Special Condition 1]
- 2) The incinerator shall be equipped with a continuous chart recorder which is able to monitor, display and record the temperature in the final combustion chamber to an accuracy of plus or minus two percent (2%). The operators shall maintain the final combustion chamber at a temperature of no less than the baseline temperature which will be established during performance testing as outlined in Special Condition 9. [CP #022007-011, Special Condition 3]
- 3) University of Missouri - Columbia shall maintain an accurate record of the amount and type of waste combusted at this installation. University of Missouri - Columbia shall record the monthly amount of waste combusted at this facility. University of Missouri - Columbia shall use Attachment F, “Waste Tracking Sheet” or an equivalent form for this purpose. University of Missouri - Columbia shall maintain records on-site for the most recent 60 months of all records required by construction permit #022007-011 and shall immediately make such records available to any Missouri Department of Natural Resources’ personnel upon verbal request. [CP #022007-011, Special Condition 5]

**Performance Testing:**

University of Missouri - Columbia shall conduct performance tests on the Therm-Tec Model A-8-P-S to determine that it meets the criterion of 99.9% combustion efficiency, less than ten percent (10%) opacity, and to determine its particulate emission concentration. These tests shall be performed within 60 days after achieving the maximum production rate of the installation, but not later than 180 days after initial start-up for commercial operation and shall be conducted in accordance with the Stack Test Procedures outlined in Special Conditions 10 through 12. [\[CP #022007-011, Special Condition 9\]](#)

**Reporting:**

- 1) A completed Proposed Test Plan Form (enclosed with Construction Permit) must be submitted to the Air Pollution Control Program 30 days prior to the proposed test date so that the Air Pollution Control Program may arrange a pretest meeting, if necessary, and assure that the test date is acceptable for an observer to be present. The Proposed Test Plan may serve the purpose of notification and must be approved by the Director prior to conducting the required emission testing. [\[CP #022007-011, Special Condition 10\]](#)
- 2) Two (2) copies of a written report of the performance test results shall be submitted to the Director within 30 days of completion of any required testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required U.S. EPA Method for at least one (1) sample run. [\[CP #022007-011, Special Condition 11\]](#)
- 3) The test report is to fully account for all operational and emission parameters addressed both in the permit conditions as well as in any other applicable state or federal rules or regulation. [\[CP #022007-011, Special Condition 12\]](#)

**PERMIT CONDITION EU0300-002**  
**10 CSR 10-6.260 Restriction of Emissions of Sulfur Compounds**

**Emission Limitations:**

- 1) Emissions from any new source operation shall not contain more than five hundred parts per million by volume (500 ppmv) of U. S. Forest Service sulfur dioxide.
- 2) Stack gasses shall not contain more than thirty-five milligrams (35 mg) per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.
- 3) 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.

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO <sub>2</sub> )	0.03 parts per million (ppm) (80 micrograms per cubic meter (µg/m <sup>3</sup> ))	Annual arithmetic mean
	0.14 ppm (365 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
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

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

**Operational Limitation/Equipment Specifications:**

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

**Monitoring/Recordkeeping:**

Documentation supporting the fuel used is pipeline grade natural gas.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

EU0310 and EU0320 – Boilers			
Emission Unit	Description	Manufacturer/Model #	EIQ Reference #
EU0310	Three Boilers; MHDR 14.6 MMBtu/hr; fired by natural gas and diesel fuel. Constructed in 1975.	Kewanee	NA
EU320	Two Boilers; MHDR 12.6 MMBtu/hr by natural gas; 11.7 MMBtu/hr by diesel fuel. Constructed in 1985.	Kewanee	NA

**PERMIT CONDITION (EU0310 & EU0320)-001  
 10 CSR 10-6.260 Restriction of Emissions of Sulfur Dioxide**

**Emission Limitations:**

- 1) Emissions from any new source operation shall not contain more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide.
- 2) Stack gasses shall not contain more than thirty-five milligrams (35 mg) per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.
- 3) 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.

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO <sub>2</sub> )	0.03 parts per million (ppm) (80 micrograms per cubic meter (µg/m <sup>3</sup> ))	Annual arithmetic mean
	0.14 ppm (365 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

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
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

**Operational Limitation/Equipment Specifications:**

- 1) The emission units shall be limited to burning natural gas and diesel fuel oil.
- 2) Boiler operation is limited to no more than 2 boilers in operation at any one time.

**Monitoring/Recordkeeping:**

- 1) The permittee shall maintain an accurate record of the sulfur content of 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 Department of Natural Resources' personnel upon request.
- 3) All records shall be maintained for five (5) years.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

**PERMIT CONDITION (EU0310 & EU0320)-002**  
**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 **existing** source any visible emissions with an opacity greater than 40%.
- 2) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any **new** source any visible emissions with an opacity greater than 20%.
- 3) 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 this emission unit 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 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 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.

**Record Keeping:**

1. The permittee shall maintain records of all observation results (see Attachment H), 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 J)
3. The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment I)
4. Attachments H, I, and J contain logs including these record keeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
5. These records shall be made available immediately for inspection to Department of Natural Resources personnel upon request.
6. All records shall be maintained 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 permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
2. The permittee shall report any deviations/exceedances of this permit condition to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

### III. Core 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 10-6.050 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(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065(6)(C)3.B]

### **10 CSR 10-6.110 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 June 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. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

#### **10 CSR 10-3.030 Open Burning Restrictions**

- 1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
  - a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
  - b) The schedule of burning operations;
  - c) The exact location where open burning will be used to dispose of the trade wastes;
  - d) Reasons why no method other than open burning is feasible; and
  - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt University of Missouri - Columbia 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 10-6.100 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.

- 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 10-6.080 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.

## **IV. General Permit Requirements**

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

### **10 CSR 10-6.065(6)(C)1.B Permit Duration**

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

### **10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements**

- 1) Recordkeeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources’ personnel upon request.

2) Reporting

- a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
- b) The permittee shall submit a report of all required monitoring by:
  - i) October 1st for monitoring which covers the January through June time period, and
  - ii) April 1st for monitoring which covers the July through December time period.
  - iii) Exception. Monitoring requirements which require reporting more frequently than semi annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
- c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
- d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
  - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A 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 semiannual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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(6)(C)1.F Severability Clause**

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

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

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

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

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

**10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios**

None

### **10 CSR 10-6.065(6)(C)3 Compliance Requirements**

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted 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 EPA Region VII, 901 North 5th 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.

### **10 CSR 10-6.065(6)(C)6 Permit Shield**

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
  - a) The application requirements are included and specifically identified in this permit, or

- b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
  - a) The provisions of 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 authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
  - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

#### **10 CSR 10-6.065(6)(C)7 Emergency Provisions**

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

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

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) 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), recordkeeping, reporting or compliance requirements of the permit.
  - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
  - b) The permit shield shall not apply to these changes.

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

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
  - b) The permittee must provide written notice of the change to the Air Pollution Control Program, 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 notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
  - d) The permit shield shall not apply to these changes.

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

The application utilized in the preparation of this permit was signed by Peter C. Ashbrook, Director of Environmental Health and Safety. 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(6)(E)6 Reopening-Permit for Cause**

This permit may be reopened for 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—:
  - 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,
- 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.

#### **10 CSR 10-6.065(6)(E)1.C Statement of Basis**

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

## **V. Attachments**

Attachments follow.







**ATTACHMENT I**

This attachment may be used to help meet the record keeping requirements of Permit Conditions: (EU0310 & EU0320)-002.

<b>Method 9 Opacity Emissions Observations</b>	
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							

<b>SUMMARY OF AVERAGE OPACITY</b>				
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

\_\_\_\_\_



# 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 September 17, 2003;
- 2) 2005 Emissions Inventory Questionnaire, received March 17, 2006;
- 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 Factor Information Retrieval (FIRE) Data System Version 6.25; and
- 5) U.S. EPA document, *Emission Factor Documentation for AP-42 Section 2.6 Medical Waste Incineration*, Office of Air Quality Planning and Standards, Office of Air and Radiation, July 1993.

## Historical Notes

The following historical notes explain the differences between the emission units and limitations in this operating permit and the previous operating permit, OP1999-031.

- 1) The following emission units were included in OP1999-031 but are not included in this operating permit because these units are part of the University of Missouri - Columbia Power Plant (Installation ID #019-0004) not the Main Campus (Installation ID #019-0047):
  - a) Southwest Well Pump Backup Generator, listed on page 19 of OP1999-031,
  - b) Two 19,500-gallon Fuel Oil Storage Tanks, listed on page 19 of OP1999-031, and
  - c) North Well Emergency Generator, listed as EP-23 in OP1999-031.
- 2) The following emission units, which were included in OP1999-031, have been physically removed from the installation and are not included in this operating permit:

Description	EU ID #
Emergency Generator	EP-3
Emergency Generator	EP-8
Emergency Generator	EP-9
Boiler	EP-11
Emergency Generator	EP-16
Emergency Generator	EP-17
Fuel Tank	EP-24
Emergency Generator	EP-57
Parts Washer	EP-70
Printing Presses	EP-72
Emergency Generator	EP-73

- 3) The following emission units have been added since OP1999-031 was issued and are included in this operating permit:

OP EU#	Description	EQ EP ID #
EU0150	Telecommunications North Emergency Generator	EP-55
EU0170	Hospital Emergency Generator #6	EP-58
EU0180	Hospital Emergency Generator #7	EP-59
EU0190	Rock Quarry Center Emergency Generator	EP-60
EU0210	Life Sciences Emergency Generator #1	EP-75
EU0220	Life Sciences Emergency Generator #2	EP-76
EU0230	ABNR/Tucker/Ag Emergency Generator	EP-77
EU0240	Basketball Arena Emergency Generator	EP-79
EU0250	Gustin Parts Washer	EP-43

EU0260	Hospital Parts Washer	EP-49
EU0270	Engineering Parts Washer	EP-50
EU0280	Quarterdeck Paint Booth	EP-01Q
EU0290	General Services Paint Booth	EP-69
EU0300	Veterinary Diagnostic Incinerator*	NA
EU0310	Three (3) 14.6 MMBtu/hr Boilers	EP-05E
EU0320	Two (2) 12.6 MMBtu/hr Boilers	EP-01CRH
NA	General Services 12,250-gallon Unleaded Fuel Tank	EP-37
NA	General Stores 12,500-gallon Ethanol 10% Tank	EP-38
NA	Jet Copter Underground Storage Tank	EP-39
NA	Research Reactor Sulfuric Acid Tank	EP-40
NA	Hospital Critical Care 4000-gallon Diesel Tank	EP-53
NA	Faurot Field Emergency Generator	EP-56
NA	Anagan Ceramics Kiln	EP-61
NA	Catenary Arch Style Ceramics Kiln	EP-62
NA	Sprung Arch Style Ceramics Kiln	EP-63
NA	Box Style Ceramics Kiln	EP-64
NA	Hitt Street Parking Garage Natural Gas Boiler	EP-65
NA	Locust Street Building Natural Gas Boiler	EP-66
NA	Poultry Nutrition Building Natural Gas Boiler	EP-67
NA	Museum Support Building Natural Gas Boiler	EP-68
NA	General Services Building Parts Washer, Room 132	EP-71
NA	Soil Vapor Extraction Process	EP-74
NA	Ag Engineering Shop Parts Washer	EP-78
NA	Basketball Arena 925-gallon Diesel Storage Tank	EP-80
NA	Space Heating Boiler, Research Park Development Building	EP-81
NA	Parts Washer #1, Fine Arts Building	EP-82
NA	Parts Washer #2, Fine Arts Building	EP-83
NA	Underground Fuel Storage Tank (North)	EP-01E
NA	Underground Fuel Storage Tank (South)	EP-02E
NA	Electrical Generator – Diesel	EP-03E
NA	Six (6) Emergency Generators	EP-04E
NA	Fume Hood Exhaust	EP-06E
NA	Emergency Generator-VAG-Diesel Fueled, 175 kW	EP-85
NA	Emergency Generator-Hatch Hall-Diesel Fueled, 200 kW	EP-86
NA	Emergency Generator-CSEB-Diesel Fueled, 350 kW	EP-87
NA	Emergency Generator – Dalton – Natural Gas, 1.3 MMBtu/hr	EP-88
NA	Emergency Generator – Schweitzer – Natural Gas, 0.8 MMBtu/hr	EP-89
NA	Boiler #3 – Capital Region Hospital – Natural Gas, 3.4 MMBtu/hr	EP-02CRH
NA	Boiler #4 – Capital Region Hospital – Natural Gas, 3.4 MMBtu/hr	EP-03CRH
NA	Boiler #5 – Capital Region Hospital – Natural Gas, 1.5 MMBtu/hr	EP-04CRH
NA	Boiler #6 – Capital Region Hospital – Natural Gas, 1.0 MMBtu/hr	EP-05CRH
NA	Emergency Generator – Capital Region Hospital – Diesel Fueled, 11.4 MMBtu/hr EP	EP-06CRH
NA	12,000 Gallon Diesel Storage Tank – Capital Region Hospital	EP-07CRH
NA	15 Gallon Parts Washer	EP-08CRH

\* Veterinary Diagnostic Incinerator (EU0300) replaced an existing incinerator, Veterinary Diagnostic Incinerator (EP-35). The existing incinerator will remain in place but controls, gas supply and power will be removed after the successful start-up of the new incinerator.

- 4) OP1999-031 Section F)1)a)(1) contained the following emission limitation for Incinerator (EU0010): “*This incinerator shall be charged with no more than 224 lbs./hr (batch loaded at 40 lbs./10 min) of medical waste or 177 lbs./hr (batch loaded at 20 lbs./7 min) of radioactive waste.*” And Section F)1)a)(2) contained the following recordkeeping requirement. “*The weight of medical waste in pounds shall be recorded and the time of charging shall be recorded. These records shall be kept on hand for at least two (2) years running, and be made available immediately for inspection to Department of Natural Resources personnel up verbal request.*” Neither of these requirements is listed as a Special Condition in Construction Permit #0990-004. In addition, these requirements are not established by any of the Missouri rules; therefore, these requirements were not included in this operating permit.
- 5) 10 CSR 10-3.060, *Maximum Allowable Emissions of Particulate Matter from Fuel Buring Equipment Used for Indirect Heating*, was applied to the natural gas boilers EP-10, EP-11, EP-12, and EP-13 in OP1999-031. This rule was not applied to these boilers or any of the other natural gas-fired boilers in this operating permit because it is highly unlikely that the minimal PM emissions from these natural gas fired units would ever exceed the particulate matter emission limitation.
- 6) 10 CSR 10-3.080, *Restriction of Emission of Visible Air Contaminants*, was listed as an applicable plantwide rule in OP1999-031. This rule was rescinded on May 30, 2000 and replaced by 10 CSR 10-6.220.
- 7) 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*, was applied to the natural gas boilers EP-10, EP-11, EP-12, and EP-13 and the Clark Hall natural gas-fired emergency generator (EP-36) in OP1999-031. This rule was amended on May 30, 2004 and according to the amended rule, §(1)(A)2, combustion equipment that use exclusively pipeline grade natural gas as defined in 40 CFR 72.2 or liquid petroleum gas as defined by American Society for Testing Materials (ASTM) are exempt. Therefore, this rule was not applied to these units.

### **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.

None.

### **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) 10 CSR 10-6.100, *Alternate Emission Limits*, is not applicable because the installation is in an ozone attainment area.
- 2) 10 CSR 3.060, *Maximum Allowable Emissions of Particulate Matter from Fuel Buring Equipment Used for Indirect Heating*, was marked as applicale in the permit application. This rule was not applied to the natural gas-fired boilers because it is highly unlikely that the minimal PM emissions from these natural gas fired units would ever exceed the particulate matter emission limitation.

- 3) 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*  
The two paintbooths (EU0280 and EU0290) are required to have fabric filters in place during operation by PERMIT CONDITION (EU0280 and EU0290)-002. It is highly unlikely that there will be any visible emissions from these units with controls in place, therefore no periodic opacity monitoring is required for the spray booths.

#### Construction Permit Revisions

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

- 1) APCP Construction Permit #0990-004 authorized the installation of the Incinerator (EU0010).
  - a) Special Conditions 11, 12 and 13 concern startup, performance testing and the removal of a preexisting incinerator. Since these actions were completed at the time of EU0010's installation, these special conditions are not included in the operating permit.
  - b) This construction permit listed 10 CSR 10-6.160, *Medical Waste and Solid Waste Incinerators*, as an applicable rule. This rule was rescinded on March 29, 1993 and replaced by 10 CSR 10-6.200, *Hospital, Medical, Infectious Waste Incinerators*. Because the permittee has elected to burn only low-level radioactive waste, the permittee is exempt from this rule with the exception of the recordkeeping and reporting requirements.
  
- 2) APCP Construction Permit #0697-024 authorized the installation of Telecommunications North Emergency Generator (EU0150) with a 500-gallon diesel storage tank.
  - a) This construction permit listed 10 CSR 10-3.080, *Restriction of Emission of Visible Air Contaminants*, as an applicable rule. This rule was rescinded on May 30, 2000 and replaced by 10 CSR 10-6.220. 10 CSR 10-6.220 was not applied to EU0150 because according to §(1)(A), internal combustion engines operated outside the Kansas City or St. Louis metropolitan areas are exempt.
  
- 3) APCP Construction Permit #0697-025 authorized the installation of ten (10) cold solvents parts washers.
  - a) Only three (3) of the initial ten (10) cold solvent parts washers remain at the installation. These are Gustin Parts Washer (EU0250), Hospital Parts Washer, (EU0260) and Engineering Parts Washer (EU0270). Special Condition 1 of this construction permit is included in Permit Condition (EU0250 through EU0270)-001.
  
- 4) APCP Construction Permit #0299-013 authorized the installation of Hospital Emergency Generators #6 and #7 (EU0170 and EU0180) with a 4000-gallon underground storage tank.
  - a) This construction permit listed 10 CSR 10-3.080, *Restriction of Emission of Visible Air Contaminants*, as an applicable rule. This rule was rescinded on May 30, 2000 and replaced by 10 CSR 10-6.220. 10 CSR 10-6.220 was not applied to EU0170 and EU0180 because according to §(1)(A), internal combustion engines operated outside the Kansas City or St. Louis metropolitan areas are exempt.
  
- 5) APCP Construction Permit #012003-005 authorized the installation of Life Sciences Emergency Generators #1 and #2 (EU0210 and EU0220) with two (2) diesel storage tanks.
  - a) This construction permit listed 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*, as an applicable rule. However, this rule was not applied to EU0210 and EU0220 because according to §(1)(A), internal combustion engines operated outside the Kansas City or St. Louis metropolitan areas are exempt.
  - b) This construction permit listed 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes* as an applicable rule. However, this rule was not applied to EU0210 and EU0220 because according to §(2)(A), liquids and gases used solely as fuels are excluded in defining process weight.

- 6) APCP Construction Permit #032003-028 authorized the installation of ABNR/Tucker/Ag Emergency Generator (EU0230) with an attached 300-gallon diesel fuel tank.
  - a) This construction permit listed 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*, as an applicable rule. However, this rule was not applied to EU0230 because according to §(1)(A), internal combustion engines operated outside the Kansas City or St. Louis metropolitan areas are exempt.
  - b) This construction permit listed 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*, as an applicable rule. However, this rule was not applied to EU0230 because according to §(2)(A), liquids and gases used solely as fuels are excluded in defining process weight.
- 7) APCP Construction Permit #022007-011 authorized the installation Veterinary Diagnostic Incinerator (EU0300).
  - a) This construction permit listed 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes* as an applicable rule. However, this rule was not applied to EU0300 because according to §(1)(B)9, the burning of refuse is exempt. Refuse is defined in 10 CSR 10-6.020(2)(R)4 as garbage, rubbish, trade wastes, leaves, salvageable material, agricultural wastes or other wastes.

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

- 1) 40 CSR Part 60, Subpart Ce, *Emission Guidelines and Compliance Times for Hospital/Medical/ Infectious Waste Incinerators*
  - a) This rule does not apply to Incinerator (EU0010) because the unit has an enforceable requirement limiting the unit to combusting only pathological waste, low-level radioactive waste, and/or chemotherapeutic waste and according to §60.32e(b) when only pathological waste, low-level radioactive waste, and/or chemotherapeutic waste is burned, the combustor is exempt provided the owner or operator: notifies the Administrator of an exemption claim; and keeps records on a calendar quarter basis of the periods of time when only pathological waste, low-level radioactive waste, and/or chemotherapeutic waste is burned.
  - b) This rule does not apply to the Vet Diagnostic Incinerator (EU0300) because it was constructed after June 20, 1996.
- 2) 40 CSR Part 60, Subpart Ec, *Standards of Performance for Hospital/Medical/Infectious Waste Incinerators for Which Construction is Commenced After June 20, 1996*
  - a) This rule does not apply to the Incinerator (EU0010) because it was constructed prior to June 20, 1996
  - b) This rule does not apply to the Veterinary Diagnostic Incinerator (EU0300) because the unit has an enforceable requirement limiting the unit to combusting 10% or less hospital or medical/infectious waste and according to §60.50c any co-fired combustor subject to an enforceable requirement limiting the unit to combusting a fuel feed stream, 10 percent or less of the weight of which is comprised, in aggregate, of hospital waste and medical/infectious waste as measured on a calendar quarter basis is exempt provided that the owner or operator: notifies the Administrator of an exemption claim; provides an estimate of the relative amounts of hospital waste, medical/infectious waste, and other fuels and wastes to be combusted; and keeps records on a calendar quarter basis of the weight of hospital waste and medical/infectious waste combusted, and the weight of all other fuels and wastes combusted at the co-fired combustor.
- 3) CFR Part 60, Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*
  - a) This rule does not apply to this installation because there are no storage vessels that were constructed, reconstructed or modified after July 23, 1984 with capacities greater than or equal to 75 cubic meters (20,000 gallons).
- 4) 40 CFR Part 60, Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*, applies to stationary compression ignition internal combustion engines that were manufactured, modified or reconstructed after July 11, 2005. There are no units at this installation that meet these criteria.

- 5) 40 CFR Part 60 Subpart JJJJ, *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*. On June 12, 2006, the US EPA proposed new source standards of performance for stationary spark ignition internal combustion engines. As proposed, the rule will apply to stationary spark ignition internal combustion engines that were manufactured, modified or reconstructed after June 12, 2006. There are no units at this installation that meet these criteria.

None of the other NSPS standards applies.

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

None.

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

- 1) 40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*, does not apply to this installation because the installation's parts washers use Safety Kleen Premium Gold Solvent, which does not contain the halogenated HAP solvents regulated by this rule.
- 2) 40 CFR Part 63 Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, is currently applicable to reciprocating internal combustion engines (RICE) at a major source of HAP emissions. On June 12, 2006, the US EPA proposed a revision of this rule to include RICE at area sources. As proposed, Generators (EU0020 through EU0240) have no regulatory requirements because they were constructed before June 12, 2006.

None of the other NESHAP standards applies.

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

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)* is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with any emission limitation or standard and has precontrol emissions that exceed or are equivalent to the major source threshold.

#### **Other Regulatory Determinations**

- 1) 10 CSR 3.060, *Maximum Allowable Emissions of Particulate Matter from Fuel Buring Equipment Used for Indirect Heating*
  - a) This rule does not apply to Incinerator (EU0010), Generators (EU0020 through EU0240), Veterinary Diagnostic Incinerator (EU0300), Clark Hall Emergency Generator (EP-36), Faurot Field Emergency Generator (EP-56) or the kilns (EP-61 through EP-64) because these units are not used for indirect heating.
- 2) 10 CSR 10-6.200, *Hospital, Medical, Infectious Waste Incinerators*
  - a) This rule does not apply to Incinerator (EU0010) on condition that only pathological waste, low-level radioactive waste, and/or chemotherapeutic waste are burned. Permit Condition EU0010-002 is included to establish that only these wastes are burned and to establish the mandatory recordkeeping requirements.
  - b) This rule does not apply to Veterinary Diagnostic Incinerator (EU0300) because according to §(1)(A), this rule only applies to combustors for which construction was commenced on or before June 29, 1996.
- 3) 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*
  - a) This rule does not apply to Incinerator (EU0010) and Veterinary Diagnostic Incinerator (EU0300) because according to §(1)(J), incinerators used to burn refuse in the outstate area of Missouri are exempt.
  - b) This rule does not apply to Generators (EU0020 through EU0240), Clark Hall Emergency Generator (EP-36), and Faurot Field Emergency Generator (EP-56) because according to §(1)(A), internal combustion engines operated outside the Kansas City or St. Louis metropolitan areas are exempt.
  - c) This rule does not apply to the following natural gas-fired boilers because is highly unlikely that the minimal PM emissions from these natural gas fired units would ever exceed the opacity limit.

EQ EP#	Emission Unit Description
EP-10	Professional Bldg. Steam Heat Boiler
EP-12	Fine Arts Annex Hot Water Boiler
EP-13	Research Park Dev. Bldg. Hot Water Boiler
EP-65	Natural Gas Boiler - Hitt Street Parking Garage
EP-66	Natural Gas Boiler - Locust Street Building
EP-67	Natural Gas Boiler - Poultry Nutrition Building
EP-68	Natural Gas Boiler - Museum Support Building
EP-81	Space Heating Boiler Research Park Development Building
EP02-CRH	Boiler #3 – Capital Region Hospital
EP03-CRH	Boiler #4 – Capital Region Hospital
EP04-CRH	Boiler #5 – Capital Region Hospital – Keene Bldg.
EP05-CRH	Boiler #6 – Capital Region Hospital – Keene Bldg.

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

- a) This rule applies to Incinerator (EU0010) and Veterinary Diagnostic Incinerator (EU0300). According to U.S. EPA document, *Emission Factor Documentation for AP-42 Section 2.6 Medical Waste Incineration*, the uncontrolled SO<sub>2</sub> emissions from medical waste incinerator are estimated to be on the order of 100 ppm or less. Therefore, it is assumed that these emission units are in compliance with the limit of 500 ppmv of sulfur dioxide.
- b) This rule applies to Generators (EU0020 through EU0240). The calculations below demonstrate that these units will be in compliance with this rule.

General Equation

$$\text{ppmv SO}_2 = \text{SO}_2 \text{ Emission Factor (lb/MMBtu)} \div \text{F factor (wscf/MMBtu)} \div \text{Conversion Factor (lb/scf)} \times \text{Conversion Factor (ppmv/ppmw)}$$

Where:

- All of the sulfur in the fuel is converted to SO<sub>2</sub> emissions.
- For generators > 600 hp: SO<sub>2</sub> emission factor is 1.01S lb/MMBtu. Assumed S = 0.5. [EPA AP-42, Table 3.4-1]
- For generators < 600 hp: SO<sub>2</sub> emission factor is 0.29 lb/MMBtu. [EPA AP-42, Table 3.3-1]
- The F factor is the ratio of gas volume of products of combustion to the heat content of the fuel. For fuel oil, the F factor is 10,320 wscf/MMBtu. [40 CFR Part 60 Appendix A Method 19 Table 19-2]
- Conversion factor = 1.660E-7 lb/scf per ppm. [40 CFR Part 60 Appendix A Method 19, Table 19-1]
- Conversion factor for ppmw to ppmv = 28.8/MW = 28.8/64 = 0.45 [EPA AP-42, App A]
- For generators > 600 hp

$$\text{ppmv SO}_2 = \frac{1.01(0.5) \text{ lb}}{\text{MMBtu}} \times \frac{\text{MMbtu}}{10,320 \text{ ft}^3} \times \frac{\text{scf}}{1.660E^{-7} \text{ lb}} \times \frac{0.45 \text{ ppmv}}{\text{ppmw}} = 133 \text{ ppmv SO}_2 < 500 \text{ ppmv}$$

- For generators < 600 hp

$$\text{ppmv SO}_2 = \frac{0.29 \text{ lb}}{\text{MMBtu}} \times \frac{\text{MMbtu}}{10,320 \text{ ft}^3} \times \frac{\text{scf}}{1.660E^{-7} \text{ lb}} \times \frac{0.45 \text{ ppmv}}{\text{ppmw}} = 76 \text{ ppmv SO}_2 < 500 \text{ ppmv}$$

- c) This rule does not apply to the following natural gas-fired boilers, kilns and generators because according to §(1)(A)2, combustion equipment that uses exclusively pipeline grade natural gas as defined in 40 CFR 72.2 or liquid petroleum gas as defined by American Society for Testing Materials (ASTM) are exempt.

EQ EP#	Emission Unit Description
EP-10	Professional Bldg. Steam Heat Boiler
EP-12	Fine Arts Annex Hot Water Boiler
EP-13	Research Park Dev. Bldg. Hot Water Boiler
EP-36	Clark Hall Emergency Generator
EP-56	Faurot Field Emergency Generator
EP-63	Sprung Arch Style Ceramics Kiln
EP-64	Box Style Ceramics Kiln

EP-65	Natural Gas Boiler - Hitt Street Parking Garage
EP-66	Natural Gas Boiler - Locust Street Building
EP-67	Natural Gas Boiler - Poultry Nutrition Building
EP-68	Natural Gas Boiler - Museum Support Building
EP-81	Space Heating Boiler Research Park Development Building
EP02-CRH	Boiler #3 – Capital Region Hospital
EP03-CRH	Boiler #4 – Capital Region Hospital
EP04-CRH	Boiler #5 – Capital Region Hospital – Keene Bldg.
EP05-CRH	Boiler #6 – Capital Region Hospital – Keene Bldg.

- d) This rule does not apply to the two (2) wood-fired kilns, Anagan Ceramics Kiln (EP-61) or Catenary Arch Style Ceramics Kiln (EP-62) because it is highly unlikely that the minimal SO<sub>x</sub> emissions from these wood-fired units would ever exceed the SO<sub>x</sub> emission limitation. According to EPA document AP-42, Table 1.6-2, the SO<sub>2</sub> emission factor for wood fired combustion is 0.025 lb/MMBtu.
- 5) 10 CSR 10-6.360, *Control of NO<sub>x</sub> Emissions From Electric Generating Units and Non-Electric Generating Boilers*
- a) This rule does not apply to Generators (EU0020 through EU0240), Clark Hall Emergency Generator (EP-36), and Faurot Field Emergency Generator (EP-56) because according to §(1)(A), this rule does not apply to installations located in Boone County.
- 6) 10 CSR 10-6.390, *Control of NO<sub>x</sub> Emissions from Large Stationary Internal Combustion Engines*
- a) This rule does not apply to Generators (EU0020 through EU0240), Clark Hall Emergency Generator (EP-36), and Faurot Field Emergency Generator (EP-56) because according to §(1), this rule does not apply to installations located in Boone County.
- 7) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*
- a) This rule does not apply to Incinerator (EU0010) and Veterinary Diagnostic Incinerator (EU0300) because according to §(1)(B)9, the burning of refuse is exempt.
- b) This rule does not apply to Generators (EU0020 through EU0240), Clark Hall Emergency Generator (EP-36), Faurot Field Emergency Generator (EP-56) and natural gas-fired kilns (EP-62 and EP-63) because according to §(2)(A), liquids and gases used solely as fuels are excluded in defining process weight.
- c) This rule applies to the spray booths (EU0280 and EU0290). The calculations below verify compliance with both the PM Emission Rate and the PM Concentration provided that the required control devices are in operation and working properly:

Emission Rate Limit

$$\text{Emission Rate Limit (lb/hr) } E = 4.1(P)^{0.67}$$

Where: P = process weight rate

However, according to 10 CSR 10-6.400(1)(b)11, emission sources that at a maximum design capacity have a potential to emit less than 0.5 lb/hr of PM are exempt. Therefore, the PM emission limit has been listed as 0.5 lb/hr when the above equation calculates an emission rate of less than 0.5 lb/hr.

PM Emission Rate

$$\text{Emission Rate (lb/hr)} = (P)(\text{EmissionFactor}) \left( 1 - \frac{\text{TransferEff}}{100} \right) \left[ 1 - \left( \frac{\text{OverallControlEff}}{100} \right) \right]$$

Where: Emission Factor (lb/ton) = (% solids/100) x (2000 lb/ton)

EU #	MHDR (gal/hr)	Density (lb/gal)	Process Weight (ton/hr)	% Solids	Emission Factor (lb/ton)	Transfer Eff. (%)	Overall Control Device Efficiency (%)	Controlled Emission Rate (lb/hr)	Emission Rate Limit (lb/hr)
EU0280	18.5	11.85	0.11	44	880	75	97.14	0.69	.93
EU0290	2.0	10.96	0.01	68	1360	75	90	0.37	0.5

Notes:

1. The MHDRs listed is that of the booths' spray guns. The facility is using the booths to paint furniture. The furniture is moved into the booths, painted, allowed to dry, and then moved from the booths. Therefore, using the MHDR for the spray guns is an overestimation of the throughput rates for the booths.

**PM Concentration**

Emission rate (gr/dscf) = Emission Rate (lb/hr) x (7000 grains/lb)/Stack flow rate (SCFM)/60(min/hr)

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

EU #	Potential Controlled PM Emission Rate (lb/hr)	Stack Temp (°F)	Stack Flow Rate		Potential Concentration (gr/scf)	Allowable Concentration (gr/scf)
			ACFM	SCFM		
EU0280	0.69	77	9,100	8,947	0.009	0.3
EU0290	0.37	77	20,000	19,665	0.002	0.3

- d) This rule does not apply to the natural gas-fired boilers because according to §(1)(B)6, the burning of fuel for indirect heating is exempt.
- e) This rule does not apply to wood burning kilns (EP-61 and EP-62) because according to §(1)(B)(11), emission units that at a maximum design capacity have a potential to emit less than one-half (0.5) pounds per hour of particulate matter are exempt. The following table demonstrates that these units have the potential to emit less than 0.5 lb/hr. In addition, 10 CSR 10-6.220 was not applied to these units since it is highly unlikely that equipment that has the uncontrolled potential to emit less than 0.5 lbs/hr of particulate matter would ever exceed the 20% opacity threshold required by this rule.

EP #	EU Description	Fuel	MHDR (MMBtu/hr)	EF (lb/MMBtu)	EF Source	PM emissions (lb/hr)
61	Anagan Ceramics Kiln	wood	0.875	0.417	AP-42 Table 1.6-1	0.36
62	Catenary Arch Style Ceramics Kiln	wood	0.875	0.417	AP-42 Table 1.6-1	0.36

- 8) The following emission units were listed in the Permit Application but have since been removed from the installation and are not included in the operating permit:
  - a) EP-45 Shurz Parts Cleaner
  - b) EP-47 University Village Parts Washer
  - c) EP-51 Rollins Bott. Parts Washer
- 9) As requested by the University of Missouri – Columbia during a conference call on October 30, 2007, the Air Pollution Control program is combining Ellis Fischel’s operating permit with the University’s permit, as well as adding emission points at Columbia Regional Hospital and Quarterdeck facilities. From here on, there will be one EIQ submitted with the installation ID number being 019-0047. Emission point numbers will remain the same except for emission points from Ellis Fischel will be followed by an E, those from Columbia Regional Hospital will be followed by a CRH, and the one emission point from the Quarterdeck facility will be followed by a Q.

**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).

Prepared by:

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