



INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2017-028

Expiration Date: MAR 28 2022

Installation ID: 021-0037

Project Number: 2014-10-041

Installation Name and Address

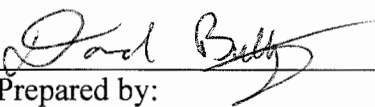
Albaugh, LLC
4900 Stockyards Expressway
St. Joseph, MO 64504
Buchanan County

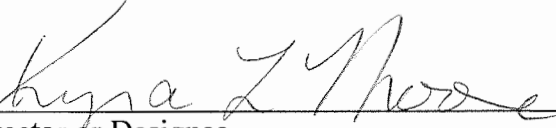
Parent Company's Name and Address

Albaugh, LLC
1525 NE 36th St.
Ankeny, IA 50021

Installation Description:

Albaugh, LLC manufacturing plant (Albaugh) manufactures, formulates, and packages a variety of herbicides, insecticides, and fungicides. Equipment utilized at the installation includes storage and mixing tanks, reaction vessels and other material handling and chemical processing equipment. The majority of the operations occur indoors. The permittee has accepted voluntary, federally enforceable emissions limitations of less than 100 tons per year VOC emissions, less than 10 tons per year for any individual HAP and less than 25 tons per year for total HAPs in order to qualify for an Intermediate Operating Permit.


Prepared by:
David Buttig
Operating Permit Unit


Director or Designee
Department of Natural Resources

MAR 28 2017

Effective Date

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I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS

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

EQ EP ##	Description of Emission Unit	Equipment ID ##
EP-01	5,310-gallon Pfaundler Reactor	R-6002
EP-10	172,950-gallon Storage Tank	T-5218
EP-17	96,380-gallon Storage Tank	T-6001
EP-22	12,710-gallon Storage Tank	T-5215
EP-24	20,880-gallon Cooling Tank	R-5302
EP-26	381,760-gallon Storage Tank	T-6002
EP-28	36,140-gallon Storage Tank	T-5405
EP-29	36,140-gallon Storage Tank	T-5410
EP-30	36,140-gallon Storage Tank	T-5415
EP-31	36,140-gallon Storage Tank	T-5420
EP-33	32,280-gallon Storage Tank	T-2201
EP-34	32,280-gallon Storage Tank	T-2202
EP-35	32,280-gallon Storage Tank	T-2203
EP-36	32,280-gallon Storage Tank	T-2204
EP-37	32,280-gallon Storage Tank	T-2205
EP-38	32,280-gallon Storage Tank	T-2206
EP-39	32,280-gallon Storage Tank	T-2207
EP-40	32,280-gallon Storage Tank	T-2208
EP-41	32,280-gallon Storage Tank	T-2209
EP-42	32,280-gallon Storage Tank	T-2210
EP-79	23,060-gallon Storage Tank	T-2406
EP-80	23,060-gallon Storage Tank	T-2407
EP-81	23,060-gallon Storage Tank	T-2408
EP-82	23,060-gallon Storage Tank	T-2409
EP-83	23,060-gallon Storage Tank	T-2410
EP-84	23,060-gallon Storage Tank	T-2411
EP-106	3,750-gallon Storage Tank	T-609
EP-107	860-gallon Storage Tank	T-611
EP-115	21,910-gallon Storage Tank	T-7001
EP-116	21,910-gallon Storage Tank	T-7002
EP-117	21,910-gallon Storage Tank	T-7003
EP-118	21,910-gallon Storage Tank	T-7004
EP-119	19,480-gallon Storage Tank	T-1701
EP-120	19,480-gallon Storage Tank	T-1702
EP-121	19,480-gallon Storage Tank	T-1703
EP-122	19,480-gallon Storage Tank	T-1704
EP-123	19,480-gallon Storage Tank	T-1705
EP-127	19,480-gallon Storage Tank	T-1709
EP-128	19,480-gallon Storage Tank	T-1710
EP-129	19,480-gallon Storage Tank	T-1711

EQ EP ##	Description of Emission Unit	Equipment ID ##
EP-155	27,670-gallon Storage Tank	T-2512
EP-156	27,670-gallon Storage Tank	T-2513
EP-158	27,670-gallon Storage Tank	T-2515
EP-159	27,670-gallon Storage Tank	T-2516
EP-160	27,670-gallon Storage Tank	T-2517
EP-161	27,670-gallon Storage Tank	T-2518
EP-163	27,670-gallon Storage Tank	T-2520
EP-164	27,670-gallon Storage Tank	T-2521
EP-165	27,670-gallon Storage Tank	T-2522
EP-166	27,670-gallon Storage Tank	T-2523
EP-167	27,670-gallon Storage Tank	T-2524
EP-168	27,670-gallon Storage Tank	T-2525
EP-169	27,670-gallon Storage Tank	T-2526
EP-170	27,670-gallon Storage Tank	T-2527
EP-174	516,540-gallon Storage Tank	T-2530
EP-175	516,540-gallon Storage Tank	T-2531
EP-176	516,540-gallon Storage Tank	T-2532
EP-177	516,540-gallon Storage Tank	T-2533
EP-178	516,540-gallon Storage Tank	T-2534
EP-180	31,770-gallon Storage Tank	T-2536
EP-181	31,770-gallon Storage Tank	T-2537
EP-182	31,770-gallon Storage Tank	T-2538
EP-183	31,770-gallon Storage Tank	T-2539
EP-184	31,770-gallon Storage Tank	T-2540
EP-185	31,770-gallon Storage Tank	T-2541
EP-186	31,770-gallon Storage Tank	T-2542
EP-187	31,770-gallon Storage Tank	T-2543
EP-188	31,770-gallon Storage Tank	T-2544
EP-189	31,770-gallon Storage Tank	T-2545
EP-190	31,770-gallon Storage Tank	T-2546
EP-191	31,770-gallon Storage Tank	T-2547
EP-192	31,770-gallon Storage Tank	T-2548
EP-193	31,770-gallon Storage Tank	T-2549
EP-194	31,770-gallon Storage Tank	T-2550
EP-195	31,770-gallon Storage Tank	T-2551
EP-199	29,980-gallon Storage Tank	T-2555
EP-200	19,880-gallon Storage Tank	T-2601
EP-201	19,880-gallon Storage Tank	T-2602
EP-202	19,880-gallon Storage Tank	T-2603
EP-203	19,880-gallon Storage Tank	T-2604
EP-204	19,880-gallon Storage Tank	T-2605
EP-226	11,930-gallon Storage/Mixing Tank	T-2306
EP-227	11,930-gallon Storage/Mixing Tank	T-2307
EP-228	11,930-gallon Storage/Mixing Tank	T-2556
EP-229	11,930-gallon Storage/Mixing Tank	T-2557
EP-230	Storage Tank: 7,000 gallons	T-501

EQ EP ##	Description of Emission Unit	Equipment ID ##
EP-231	Storage Tank: 7,000 gallons	T-502
EP-232	Storage Tank: 7,000 gallons	T-503
EP-233	Storage Tank: 7,000 gallons	T-504
EP-234	Reactor: 2,100 gallons	R-501
EP-235	Reactor: 2,100 gallons	R-502
EP-236	Reactor: 4,700 gallons	R-503
EP-237	Reactor: 4,700 gallons	R-504
EP-238	Mixer: 2,100 gallons	M-501
N/A	Emergency Generator: 870 HP diesel powered generator; MHDR 5.13 MMBtu/hr	

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.

EQ EP ##	Description of Emission Unit	Equipment ID ##
EP-01	2,160-gallon Reactor, Building 13	R-6001
EP-01	4,140-gallon Cooling Tank, Building 13	T-5252
EP-01	470-gallon Separator Tank, Building 13	V-6001
EP-01	780-gallon Separator Tank, Building 13	V-6002
EP-01	1,150-gallon Water Receiver, Building 13	V-6005
EP-01	480-gallon Vacuum Water Tank, Building 13	V-6006
EP-01	4,140-gallon Cooling Tank for R-6002, Building 13	T-6201
EP-01	4,140-gallon Cooling Tank for R-6002, Building 13	T-6202
EP-08	30,500-gallon Storage Tank, Building 11, Manufactured 1973	T-5214
EP-09	30,500-gallon Storage Tank, Building 11, Manufactured 1973	T-5102
EP-12	16,940-gallon Storage Tank, Manufactured 1986	T-5202
EP-13	34,310-gallon Storage Tank, Building 11, Manufactured 1973	T-5203
EP-20	11,860-gallon Storage Tank, Building 11, Manufactured 1973	T-5210
EP-24-1	8,240-gallon Reactor South, Building 14	R-6003
EP-24	6,190-gallon Reactor North, Building 14	R-6004
EP-24	12,870-gallon Premix Tank, Building 14	R-5353
EP-24-2	2,640-gallon Premix Tank, Building 14	R-5355
EP-24	1,320-gallon Separator Tank, Building 14	V-6003
EP-24	1,320-gallon Separator Tank, Building 14	V-6004
EP-24	6,370-gallon Steam Condensate Receiver, Building 14	T-1401
EP-24	8,470-gallon Process Water Recycle Tank, Building 14	T-1402
EP-24	480-gallon Water for Vacuum Pump Tank, Building 14	T-6005
EP-32	30,500-gallon Storage Tank, Building 11, Manufactured 1973	T-5101
EP-43	9,410-gallon Storage Tank, Building 22	T-2211
EP-44	9,410-gallon Storage Tank, Building 22	T-2212

EQ EP ##	Description of Emission Unit	Equipment ID ##
EP-45	9,410-gallon Storage Tank, Building 22	T-2213
EP-46	9,410-gallon Storage Tank, Building 22	T-2214
EP-47	9,410-gallon Storage Tank, Building 22	T-2215
EP-48	9,410-gallon Storage Tank, Building 22	T-2216
EP-49	10,170-gallon Storage Tank, Building 23	T-2301
EP-50	7,060-gallon Storage Tank, Building 23	T-2302
EP-51	2,120-gallon Storage Tank, Building 23	T-2303
EP-53	321-gallon Storage Tank, Building 23	T-2305
EP-61	17,120-gallon Storage Tank, Building 19	T-1901
EP-62	15,660-gallon Storage Tank, Building 19	T-1902
EP-63	15,660-gallon Storage Tank, Building 19	T-1903
EP-64	15,660-gallon Storage Tank, Building 19	T-1904
EP-65	15,660-gallon Storage Tank, Building 19	T-1905
EP-66	15,660-gallon Storage Tank, Building 19	T-1906
EP-67-1	17,120-gallon Storage Tank, Building 20	T-2001a
EP-67-2	17,120-gallon Storage Tank, Building 20	T-2001b
EP-68	6,220-gallon Storage Tank, Building 20	R-2001
EP-69	6,220-gallon Storage Tank, Building 20	R-2002
EP-70	10,890-gallon Storage Tank, Building 24	R-2401
EP-71	10,890-gallon Storage Tank, Building 24	R-2402
EP-72	10,890-gallon Storage Tank, Building 24	R-2403
EP-73	11,860-gallon Storage Tank, Building 24	T-2401
EP-74	15,660-gallon Storage Tank, Building 24	T-2402
EP-77	11,860-gallon Storage Tank, Building 24	T-2405
EP-78	10,170-gallon Storage Tank, Building 20	T-2002
EP-85	7,060-gallon Storage Tank, Building 11	T-6003
EP-86	12,710-gallon Storage Tank, Building 11	T-6004
EP-87	Trifluralin Transfer	
EP-88	5,880-gallon Storage Tank, Building 4	R-401
EP-88	4,670-gallon Storage Tank, Building 4	R-402
EP-88	6,020-gallon Storage Tank, Building 4	T-401
EP-88	5,720-gallon Storage Tank, Building 4	T-407
EP-91	2,100-gallon Storage Tank, Building 4	T-402
EP-93	MPCA Dump Station	
EP-94	6,470-gallon Premix Tank, Building 9	R-404
EP-98	35,260-gallon Storage Tank, Manufactured 1972	T-601
EP-99	2,310-gallon Mixing Tank, Building 6	T-602
EP-100	5,310-gallon Mixing Tank, Building 6	T-603
EP-101	5,470-gallon Mixing Tank, Building 6	T-604
EP-102	5,310-gallon Mixing Tank, Building 6	T-605
EP-103	5,310-gallon Mixing Tank, Building 6	T-606
EP-104	5,470-gallon Mixing Tank, Building 6	T-607
EP-105	5,580-gallon Mixing Tank, Building 6	T-608
EP-108	2,000-gallon Mixing Tank, Building 6	T-612
EP-109	1,490-gallon Mixing Tank, Building 6	T-613
EP-110	1,490-gallon Mixing Tank, Building 6	T-614

EQ EP ##	Description of Emission Unit	Equipment ID ##
EP-112	11,670-gallon Emulsifier, Building 7	T-706
EP-113	11,670-gallon Emulsifier, Building 7	T-707
EP-114	11,670-gallon Storage Tank, Building 7	T-708
EP-124	16,940-gallon Storage Tank; Building 17	T-1706
EP-125	16,940-gallon Storage Tank; Building 17	T-1707
EP-126	16,940-gallon Storage Tank; Building 17	T-1708
EP-130	6,020-gallon Storage Tank, Building 4	T-408
EP-131	6,020-gallon Storage Tank, Building 4	T-409
EP-132	9,250-gallon Storage Tank, Building 20	T-2003
EP-133	9,250-gallon Storage Tank, Building 20	T-2004
EP-134	9,250-gallon Storage Tank, Building 7	T-709
EP-136	7,200-gallon Storage Tank, Building 25	T-2501
EP-137	7,200-gallon Storage Tank, Building 25	T-2502
EP-138	1,270-gallon Storage Tank, Building 25	T-2503
EP-139	11,860-gallon Reactor, Building 25	R-2501
EP-140	11,860-gallon Reactor, Building 25	R-2502
EP-141	11,860-gallon Reactor, Building 25	R-2503
EP-142	11,860-gallon Reactor, Building 25	R-2504
EP-143	11,860-gallon Reactor, Building 25	R-2505
EP-144	11,860-gallon Reactor, Building 25	R-2506
EP-145	11,440-gallon Reactor, Building 25	R-2507
EP-146	11,440-gallon Reactor, Building 25	R-2508
EP-147	18,450-gallon Storage Tank, Building 25	T-2504
EP-148	3,170-gallon Storage Tank, Building 25	T-2505
EP-149	18,450-gallon Storage Tank, Building 25	T-2506
EP-150	3,170-gallon Storage Tank, Building 25	T-2507
EP-151	2,540-gallon Storage Tank, Building 25	T-2508
EP-152	2,540-gallon Storage Tank, Building 25	T-2509
EP-153	2,540-gallon Storage Tank, Building 25	T-2510
EP-154	2,540-gallon Storage Tank, Building 25	T-2511
EP-157	18,450-gallon Storage Tank, Building 25	T-2514
EP-162	18,450-gallon Storage Tank, Building 25	T-2519
EP-171	Thin Film Evaporator	E-2501
EP-172	10,170-gallon Storage Tank, Building 25	T-2528
EP-173	10,170-gallon Storage Tank, Building 25	T-2529
EP-196	3,460-gallon Storage Tank, Building 25	T-2552
EP-197	1,470-gallon Storage Tank, Building 25	T-2553
EP-198	287-gallon Storage Tank, Building 25	T-2554
EP-205	12,280-gallon Storage Tank, Building 26	T-2606
EP-206	12,280-gallon Storage Tank, Building 26	T-2607
EP-207	12,280-gallon Storage Tank, Building 26	T-2608
EP-208	12,280-gallon Storage Tank, Building 26	T-2609
EP-209	12,280-gallon Storage Tank, Building 26	T-2610
EP-210	8,530-gallon Storage Tank, Building 26	T-2611
EP-211	8,530-gallon Storage Tank, Building 26	T-2612
EP-212	8,530-gallon Storage Tank, Building 26	T-2613

EQ EP ##	Description of Emission Unit	Equipment ID ##
EP-213	8,530-gallon Storage Tank, Building 26	T-2614
EP-214	8,530-gallon Storage Tank, Building 26	T-2615
EP-215	5,590-gallon Storage Tank, Building 26	T-2616
EP-216	5,590-gallon Storage Tank, Building 26	T-2617
EP-217	5,590-gallon Storage Tank, Building 26	T-2618
EP-218	5,590-gallon Storage Tank, Building 26	T-2619
EP-219	5,590-gallon Storage Tank, Building 26	T-2620
EP-220	12,280-gallon Storage Tank, Building 24	T-2412
EP-221	12,280-gallon Storage Tank, Building 24	T-2413
EP-222	12,280-gallon Storage Tank, Building 24	T-2414
EP-223	12,280-gallon Storage Tank, Building 24	T-2415
EP-224	Bulk Loadout	
EP-239	17,120-gallon Mixing Tank, Building 24	T-2403
EP-240	17,120-gallon Mixing Tank, Building 24	T-2404
EP-241	Centrifuge, Wetcake Bagging, and Electric Dryer	
EP-242	Marley Cooling Tower with Dust Collector and Scrubber	
EP-243	Flash Cooler, Condenser, Crystallizer, Hydro-cyclone, Concentrate, Mother Liquor: With Scrubber	

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations or Emission Units without Limitations.

PERMIT CONDITION PW001

10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

Emission Limitations:

- 1) The permittee shall emit less than 100.0 tons of volatile organic compounds (VOC) in any consecutive twelve-month period.
- 2) The permittee shall emit less than ten (10) tons of any individual Hazardous Air Pollutant (HAP) and less than twenty-five (25) tons of total HAPs in any consecutive twelve-month period.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain an accurate record of the VOC and HAP emissions. Attachments A, B, and C, or equivalent forms, shall be used to demonstrate compliance with the emission limits.
- 2) These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
- 3) All records shall be maintained for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten days after any exceedance of any limitation established by this permit condition.
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10 CSR 10-6.065(5)(A).

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 1		
10 CSR 10-6.060 Construction Permits Required Construction Permit #0794-021, Issued July 15, 1994		
EIQ Reference #	Description	Manufacturer/Model #
EP-01	R-6002: 5,310-gallon Pfaundler Reactor used for the preparation of 2,4,-Dichlorophenoxyacetic Acid (2,4,-D) esters; Manufacture Date 1994; Building 13.	N/A

Emission Limitations:

The permittee shall limit the production of 2,4-D esters in the R-6002 (EP-01) to 696,000 gallons in any 12-month cumulative period. [Special Condition 1]

Monitoring:

The permittee shall ensure that all associated control equipment is maintained according to manufacturer's specifications and used at all times the emission unit is in operation. [Special Condition 4]

Recordkeeping:

- 1) The permittee shall keep records of the monthly amount of 2,4-D esters produced in the reactor. These records shall also indicate the total quantity of 2,4-D esters produced over the previous 12-month period. [Special Condition 2]
- 2) Attachment D or an equivalent form shall be used to demonstrate compliance with the production limits.
- 3) Manufacturer's specifications for the emission unit and control device shall be kept onsite at all times.
- 4) The permittee shall maintain an operating and maintenance log for the control device which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
- 5) All records shall be maintained for five (5) years. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon their verbal request and presentation of identification.

Reporting:

- 1) The permittee shall submit a copy of the records (Attachment D) that demonstrates noncompliance with the production limits to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, within ten (10) days of the end of the time period showing noncompliance. [Special Condition 3]

- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10 CSR 10-6.065(5)(A).

PERMIT CONDITION 2 10 CSR 10-6.060 Construction Permits Required Construction Permit #0895-001, Issued July 28, 1995		
EQ Reference #	Description	Manufacturer/Model #
EP-119	T-1701: 19,480-gallon Storage Tank; Building 17; Manufacture Date 1995	N/A
EP-120	T-1702: 19,480-gallon Storage Tank; Building 17; Manufacture Date 1995	N/A
EP-121	T-1703: 19,480-gallon Storage Tank; Building 17; Manufacture Date 1995	N/A
EP-122	T-1704: 19,480-gallon Storage Tank; Building 17; Manufacture Date 1995	N/A
EP-123	T-1705: 19,480-gallon Storage Tank; Building 17; Manufacture Date 1995	N/A
EP-127	T-1709: 19,480-gallon Storage Tank; Building 17; Manufacture Date 1995	N/A
EP-128	T-1710: 19,480-gallon Storage Tank; Building 17; Manufacture Date 1995	N/A
EP-129	T-1711: 19,480-gallon Storage Tank; Building 17; Manufacture Date 1995	N/A

Operational Specifications:

The permittee shall limit Volatile Organic Compounds (VOC) emissions from the storage tanks (EP-119 – EP-123, EP-127 – EP-129) by submerged filling and conservation vents. [Special Condition 2]

Recordkeeping:

The permittee shall keep design/construction diagrams of the tanks onsite at all times.

Reporting:

See Statement of Basis – Other Regulatory Determinations

PERMIT CONDITION 3 10 CSR 10-6.060 Construction Permits Required Construction Permit #1095-008, Issued September 25, 1995		
EQ Reference #	Description	Manufacturer/Model #
EP-24	R-5302: 20,880-gallon Cooling Tank; Building 14; Manufacture Date 1995	N/A

Operational Specifications:

The permittee shall control the cooling tank R-5302 (EP-24)'s VOC emissions with a tube and shell condenser and an activated carbon adsorption system. [Special Condition 3]

Recordkeeping:

- 1) The permittee shall maintain an operating and maintenance log for the control device which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
- 2) The permittee shall keep design/construction diagrams of the tanks onsite at all times.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10 CSR 10-6.065(5)(A).

PERMIT CONDITION 4	
40 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	
EIQ Reference #	Description
EP-24	R-5302: 20,880-gallon Cooling Tank; Building 14; Manufacture Date 1995
EP-28	T-5405: 36,140-gallon Storage Tank; Building 11; Manufacture Date 1997
EP-29	T-5410: 36,140-gallon Storage Tank; Building 11; Manufacture Date 1997
EP-30	T-5415: 36,140-gallon Storage Tank; Building 11; Manufacture Date 1997
EP-31	T-5420: 36,140-gallon Storage Tank; Building 11; Manufacture Date 1997
EP-33	T-2201: 32,280-gallon Storage Tank; Building 22; Manufacture Date 1999
EP-34	T-2202: 32,280-gallon Storage Tank; Building 22; Manufacture Date 1999
EP-35	T-2203: 32,280-gallon Storage Tank; Building 22; Manufacture Date 1999
EP-36	T-2204: 32,280-gallon Storage Tank; Building 22; Manufacture Date 1999
EP-37	T-2205: 32,280-gallon Storage Tank; Building 22; Manufacture Date 1999
EP-38	T-2206: 32,280-gallon Storage Tank; Building 22; Manufacture Date 1999
EP-39	T-2207: 32,280-gallon Storage Tank; Building 22; Manufacture Date 1999
EP-40	T-2208: 32,280-gallon Storage Tank; Building 22; Manufacture Date 1999
EP-41	T-2209: 32,280-gallon Storage Tank; Building 22; Manufacture Date 1999
EP-42	T-2210: 32,280-gallon Storage Tank; Building 22; Manufacture Date 1999
EP-79	T-2406: 23,060-gallon Storage Tank; Building 24; Manufacture Date 2001
EP-80	T-2407: 23,060-gallon Storage Tank; Building 24; Manufacture Date 2001
EP-81	T-2408: 23,060-gallon Storage Tank; Building 24; Manufacture Date 2001
EP-82	T-2409: 23,060-gallon Storage Tank; Building 24; Manufacture Date 2001
EP-83	T-2410: 23,060-gallon Storage Tank; Building 24; Manufacture Date 2001
EP-84	T-2411: 23,060-gallon Storage Tank; Building 24; Manufacture Date 2001
EP-115	T-7001: 21,910-gallon Storage Tank; Building 15; Manufacture Date 1997
EP-116	T-7002: 21,910-gallon Storage Tank; Building 15; Manufacture Date 1997
EP-117	T-7003: 21,910-gallon Storage Tank; Building 15; Manufacture Date 1997
EP-118	T-7004: 21,910-gallon Storage Tank; Building 15; Manufacture Date 1997
EP-155	T-2512: 27,670-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-156	T-2513: 27,670-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-158	T-2515: 27,670-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-159	T-2516: 27,670-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-160	T-2517: 27,670-gallon Storage Tank; Building 25; Manufacture Date 2005

PERMIT CONDITION 4

40 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

EQ Reference #	Description
EP-161	T-2518: 27,670-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-163	T-2520: 27,670-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-164	T-2521: 27,670-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-165	T-2522: 27,670-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-166	T-2523: 27,670-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-167	T-2524: 27,670-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-168	T-2525: 27,670-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-169	T-2526: 27,670-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-170	T-2527: 27,670-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-180	T-2536: 31,770-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-181	T-2537: 31,770-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-182	T-2538: 31,770-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-183	T-2539: 31,770-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-184	T-2540: 31,770-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-185	T-2541: 31,770-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-186	T-2542: 31,770-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-187	T-2543: 31,770-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-188	T-2544: 31,770-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-189	T-2545: 31,770-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-190	T-2546: 31,770-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-191	T-2547: 31,770-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-192	T-2548: 31,770-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-193	T-2549: 31,770-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-194	T-2550: 31,770-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-195	T-2551: 31,770-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-199	T-2555: 29,980-gallon Storage Tank; Building 25; Manufacture Date 2005
EP-200	T-2601: 19,880-gallon Storage Tank; Building 26; Manufacture Date 2007
EP-201	T-2602: 19,880-gallon Storage Tank; Building 26; Manufacture Date 2007
EP-202	T-2603: 19,880-gallon Storage Tank; Building 26; Manufacture Date 2007
EP-203	T-2604: 19,880-gallon Storage Tank; Building 26; Manufacture Date 2007
EP-204	T-2605: 19,880-gallon Storage Tank; Building 26; Manufacture Date 2007

Note: Each of the above listed tanks have a design capacity greater than or equal to 75 m³ (19,810 gallons) but less than 151 m³ (39,890 gallons) and contains a volatile organic liquid that has a maximum true vapor pressure less than 27.6 kPa. Therefore, the installation of control equipment is not required and §60.112b, §60.113b, §60.114b, and §60.115b are not applicable.

Recordkeeping:

- 1) The permittee shall keep readily accessible records showing the dimension of the storage vessel and a calculation showing the capacity of the storage vessels. These records shall be kept for the life of the source. [§60.116b(a) and §60.116b(b)]
- 2) If the maximum true vapor pressure of the liquid stored in any of the above tanks is greater than or equal to 15.0 kPa, the permittee shall maintain a record of the Volatile Organic Liquids (VOL) and

its maximum true vapor pressure during the respective storage period. These records shall be kept for a minimum of 5 years. [§60.116b(a) and §60.116b(c)]

- 3) All records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon their verbal request and presentation of identification.
- 4) Available data on the storage temperature can be used to determine the maximum true vapor pressure as determined below. [§60.116b(e)]
 - a) For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service. [§60.116b(e)(1)]
 - b) The vapor pressure: [§60.116b(e)(3)]
 - i) May be obtained from standard reference texts, or [§60.116b(e)(3)(i)]
 - ii) Determined by ASTM D2879-83, 96, or 97 (incorporated by reference-see §60.17); or [§60.116b(e)(3)(ii)]
 - iii) Measured by an appropriate method approved by the Director; or [§60.116b(e)(3)(iii)]
 - iv) Calculated by an appropriate method approved by the Director. [§60.116b(e)(3)(iv)]
- 5) The permittee of each vessel storing a waste mixture of indeterminate or variable composition shall be subject to the following requirements. [§60.116b(f)]
 - a) Prior to the initial filling of the vessel, the highest maximum true vapor pressure for the range of anticipated liquid compositions to be stored will be determined using the methods described in §60.116b(e). [§60.116b(f)(1)]
 - b) For vessels in which the vapor pressure of the anticipated liquid composition is above the cutoff for monitoring but below the cutoff for controls as defined in §60.112b(a), an initial physical test of the vapor pressure is required; and a physical test at least once every 6 months thereafter is required as determined by the following methods: [§60.116b(f)(2)]
 - i) ASTM D2879-83, 96, or 97 (incorporated by reference-see §60.17); or [§60.116b(f)(2)(i)]
 - ii) ASTM D323-82 or 94 (incorporated by reference-see §60.17); or [§60.116b(f)(2)(ii)]
 - iii) As measured by an appropriate method as approved by the Director. [§60.116b(f)(2)(iii)]

Reporting:

If the maximum true vapor pressure of the liquid stored in any of the above listed tanks exceeds 27.6 kPa, the permittee shall notify the Director within 30 days. [§60.116b(d)]

PERMIT CONDITION 5	
10 CSR 10-6.060 Construction Permit Required Construction Permit #1295-011, Issued November 22, 1995	
EIQ Reference #	Description
EP-26	T-6002: 381,760-gallon Carbon Steel Chemical Storage Tank; Contents - 2,4 Dichlorophenoxyacetic Acid, 2-Ethylhexyl Ester; Building 11; Manufacture Date 1996

Operational Specifications:

- 1) Construction permit #1295-011 only allows for the storage of 2,4-Dichlorophenoxyacetic Acid, 2-Ethylhexyl Ester in the storage tank T-6002 (EP-26). If other chemicals are desired to be stored in this tank, the permittee shall submit an application to determine the need for a construction permit amendment. [Special Condition 1]

- 2) The permittee shall control emissions from Storage Tank T-6002 (EP-26) by submerged filling and a conservation vent. [Special Condition 2]

Recordkeeping:

The permittee shall keep design/construction diagrams of the tank onsite at all times.

Reporting:

See Statement of Basis – Other Regulatory Determinations

PERMIT CONDITION 6	
10 CSR 10-6.060 Construction Permit Required	
Construction Permit #0797-010, Issued June 25, 1997	
EIQ Reference #	Description
EP-22	T-5215: 12,710-gallon Storage Tank; Building 11, Manufacture Date 1990
EP-115	T-7001: 21,910-gallon Storage Tank; Building 15, Manufacture Date 1997
EP-116	T-7002: 21,910-gallon Storage Tank; Building 15, Manufacture Date 1997
EP-117	T-7003: 21,910-gallon Storage Tank; Building 15, Manufacture Date 1997
EP-118	T-7004: 21,910-gallon Storage Tank; Building 15, Manufacture Date 1997
EP-106	T-609: 3,750-gallon Storage Tank; Building 6, Manufacture Date 1986
EP-107	T-611: 960-gallon Storage Tank; Building 6, Manufacture Date 1986

Emission Limitations:

The permittee shall not emit more than 6.82 tons of volatile organic compounds from the storage vessels identified as T-5215, T-7001, T-7002, T-7003, T-7004, T-609, T-611 (EP-22, EP-115 – EP-118, EP-106, EP-107) in any consecutive 12-month period. [Special Condition 1]

Recordkeeping:

The permittee shall maintain an accurate monthly record of volatile organic compound emissions from the storage vessels identified as T-5215, T-7001, T-7002, T-7003, T-7004, T-609, T-611 (EP-22, EP-115 – EP-118, EP-106, EP-107) at this installation. These records shall include monthly and rolling 12-month totals. These records shall be kept on-site for the most recent sixty (60) month period of operation and be made immediately available to Department of Natural Resources’ personnel upon request. Records shall be on Attachment E or on any substantially conforming form that contains the same information. [Special Condition 2]

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of each month, if the 12-month cumulative total records (Attachment E) show that EP-22, EP-115 – EP-118, EP-106, and EP-107 exceeded the Emission Limitation. [Special Condition 3]
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10 CSR 10-6.065(5)(A).

PERMIT CONDITION 7	
10 CSR 10-6.060 Construction Permit Required Construction Permit #032009-004, Issued March 10, 2009	
EQ Reference #	Description
EP-226	T-2306: 11,930-gallon Storage/Mixing Tank; Vertical Fixed Roof; Building 23; Used to Produce Landstar; Manufacture Date 2009
EP-227	T-2307: 11,930-gallon Storage/Mixing Tank; Vertical Fixed Roof; Building 23; Used to Produce Fallowstar; Manufacture Date 2009
EP-228	T-2556: 11,930-gallon Storage/Mixing Tank; Vertical Fixed Roof; Building 25; Used to Produce Isopropylamine Salt of Glyphosate; Manufacture Date 2009
EP-229	T-2557: 11,930-gallon Storage/Mixing Tank; Vertical Fixed Roof; Building 25; Used to Produce Isopropylamine Salt of Glyphosate; Manufacture Date 2009

Emission Limitations:

The permittee shall emit less than 40.0 tons of Volatile Organic Compounds (VOCs) from storage/mixing tanks T-2306, T-2307, T-2556, and T-2557 (EP-226 – EP-229) in any consecutive 12-month period. [Special Condition 1]

Recordkeeping:

- 1) Attachment F or equivalent forms approved by the Air Pollution Control Program shall be used by the permittee to demonstrate compliance with the 40 tpy VOC emission limitation.
- 2) The permittee shall maintain all records required by this permit condition for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
- 3) These records shall include Material Safety Data Sheets (MSDS) for all materials stored or mixed in the tanks.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the 12-month cumulative total records (Attachment F) indicate that the source exceeds the 40 tpy VOC emission limitation. [Special Condition 3]
- 2) The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(5)(A).

PERMIT CONDITION 8

10 CSR 10-6.070 New Source Performance Regulations
40 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

EIQ Reference #	Description
EP-10	T-5218: 172,950-gallon Storage tank; building 25; manufacture date 1996
EP-174	T-2530: 516,540-gallon Storage tank; building 25; manufacture date 2005
EP-175	T-2531: 516,540-gallon Storage tank; building 25; manufacture date 2005
EP-176	T-2532: 516,540-gallon Storage tank; building 25; manufacture date 2005
EP-177	T-2533: 516,540-gallon Storage tank; building 25; manufacture date 2005
EP-178	T-2534: 516,540-gallon Storage tank; building 25; manufacture date 2005
EP-17	T-6001: 96,380-gallon storage tank; building 11; manufacture date 1984

Note: EP-10, EP-17, and EP-174 through EP-178 each have a design capacity greater than or equal to 151 m³ (39,890 gallons) and contain volatile organic liquids that have a maximum true vapor pressure less than 5.2 kPa. Therefore, the installation of control equipment is not required and §60.112b, §60.113b, §60.114b, §60.115b are not applicable.

Recordkeeping:

- 1) The permittee shall keep readily accessible records showing the dimension of the storage vessel and a calculation showing the capacity of the storage vessels. These records shall be kept for the life of the source. [§60.116b(a) and §60.116b(b)]
- 2) If the maximum true vapor pressure of the liquid stored in EP-10, EP-17, and EP-174 – EP-178 is greater than or equal to 3.5 kPa, the permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. These records shall be kept for a minimum of 5 years. [§60.116b(a) and §60.116b(c)]
- 3) All records shall be made available immediately for inspection to the Department of Natural Resources’ personnel upon their verbal request and presentation of identification.
- 4) Available data on the storage temperature can be used to determine the maximum true vapor pressure as determined below. [§60.116b(e)]
 - a) For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service. [§60.116b(e)(1)]
 - b) The vapor pressure: [§60.116b(e)(3)]
 - i) May be obtained from standard reference texts, or [§60.116b(e)(3)(i)]
 - ii) Determined by ASTM D2879–83, 96, or 97 (incorporated by reference—see §60.17); or [§60.116b(e)(3)(ii)]
 - iii) Measured by an appropriate method approved by the Director; or [§60.116b(e)(3)(iii)]
 - iv) Calculated by an appropriate method approved by the Director. [§60.116b(e)(3)(iv)]
- 5) The owner or permittee shall be subject to the following requirements. [§60.116b(f)]
 - a) Prior to the initial filling of the vessel, the highest maximum true vapor pressure for the range of anticipated liquid compositions to be stored will be determined using the methods described in §60.116b(e). [§60.116b(f)(1)]

- b) For vessels in which the vapor pressure of the anticipated liquid composition is above the cutoff for monitoring but below the cutoff for controls as defined in §60.112b(a), an initial physical test of the vapor pressure is required; and a physical test at least once every 6 months thereafter is required as determined by the following methods: [§60.116b(f)(2)]
 - i) ASTM D2879-83, 96, or 97 (incorporated by reference-see §60.17); or [§60.116b(f)(2)(i)]
 - ii) ASTM D323-82 or 94 (incorporated by reference-see §60.17); or [§60.116b(f)(2)(ii)]
 - iii) As measured by an appropriate method as approved by the Director. [§60.116b(f)(2)(iii)]

Reporting:

If the maximum true vapor pressure of the liquids stored in EP-10, EP-17, and EP-174 through EP-178 exceeds 5.2 kPa, the permittee shall notify the Director within 30 days, [§60.116b(d)]

PERMIT CONDITION 9	
10 CSR 10-6.060 Construction Permits Required Construction Permit #032012-005, Issued March 12,2012	
EIQ Reference #	Description
EP-230	Storage Tank: T-501; 7,000 gallons
EP-231	Storage Tank: T-502; 7,000 gallons
EP-232	Storage Tank: T-503; 7,000 gallons
EP-233	Storage Tank: T-504; 7,000 gallons
EP-234	Reactor: R-501; 2,100 gallons
EP-235	Reactor: R-502; 2,100 gallons
EP-236	Reactor: R-503; 4,700 gallons
EP-237	Reactor: R-504; 4,700 gallons
EP-238	Mixer: M-501; 2,100 gallons

Emission Limitations:

- 1) The permittee shall emit less than 0.01 tons of 2-methylnaphthalene (CAS #91-57-6) in any consecutive 12-month period from EP-230 through EP-238. [Special Condition 2.B.]
- 2) The permittee shall keep all chemicals in sealed containers whenever the materials are not in use.
- 3) The permittee shall provide and maintain suitable, easily read, permanent markings on chemical solution containers used with this equipment. [Special Condition 3]

Recordkeeping:

- 1) The permittee shall maintain all records required by this permit for not less than five 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. [Special Condition 4.A.]
- 2) Attachment H, or equivalent form approved by the Air Pollution Control Program, shall be used to demonstrate compliance. [Special Condition 2.C.]

Reporting:

The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which required records show an exceedance of the 0.01 ton/year 2-methylnaphthalene limitation imposed by this permit.

PERMIT CONDITION 10		
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart ZZZZ – National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines		
EQ Reference #	Description	Manufacturer/Model #
N/A	Emergency Generator: 870 HP diesel powered generator; MHDR 5.13 MMBtu/hr	Generac
Engine Category	Existing Emergency CI > 500 Hp	

Operational Requirements:

- 1) The permittee must be in compliance with the applicable requirements of MACT ZZZZ at all times. [§63.6605(a)]
- 2) At all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. [§63.6605(b)]

Work Practice Standards:

- 1) For this RICE, the permittee must meet the following requirement (*except during periods of startup*);
 - a) Change oil and filter every 500 hours of operation or annually, whichever comes first; (The permittee has the option to utilize an oil analysis program as described in §63.6625(i) or (j) in order to extend the specified oil change requirement.)
 - b) Inspect spark plugs every 1000 hours of operation or annually, whichever comes first, and replace as necessary; and
 - c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
- 2) During periods of startup the permittee must minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. [Items 4.a, 4.b and 4.c of Table 2d to Subpart ZZZZ]

Operational Limitations:

- 1) The permittee shall operate the emergency stationary RICE according to the requirements in paragraphs §63.6640(f)(1) through (4). In order for the engine to be considered an emergency stationary RICE under 40 CFR 63 Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs §63.6640(f)(1) through (4), is prohibited. [§63.6640(f)]
 - a) There is no time limit on the use of emergency stationary RICE in emergency situations. [§63.6640(f)(1)]
 - b) The permittee may operate the emergency stationary RICE for any combination of the purposes specified in paragraphs §63.6640(f)(2)(i) through (iii) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs §63.6640(f)(3) and (4) counts as part of the 100 hours per calendar year allowed by this paragraph §63.6640(f)(2). [§63.6640(f)(2)]

- i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]
 - ii) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see § 63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3. [§63.6640(f)(2)(ii)]
 - iii) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency. [§63.6640(f)(2)(iii)]
- c) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph §63.6640(f)(2). Except as provided in paragraphs §63.6640(f)(4)(i) and (ii), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(4)]
- i) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system. [§63.6640(f)(4)(i)]
 - ii) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: [§63.6640(f)(4)(ii)(A) through (E)]
 - A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
 - B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
 - C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
 - D) The power is provided only to the facility itself or to support the local transmission and distribution system.
 - E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines

that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

- 2) If the permittee does not operate the engine according to the requirements in paragraphs §63.6640(f)(1) through (4), the engine will not be considered an emergency engine under 40 CFR 63 Subpart ZZZZ and must meet all requirements for non-emergency engines. [§63.6640(f)]

Recordkeeping Requirements:

- 1) The Permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the facility's own maintenance plan. [§63.6655(e)]
- 2) The Permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The Permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in §63.6640(f)(2)(ii) or (iii) or §63.6640(f)(4)(ii), the permittee must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. [§63.6655(f)]

Reporting:

The Permittee must report each instance in which an applicable emission limitation or operating limitation in Table 2c to MACT ZZZZ was not met. These instances are deviations from the emission and operating limitations in MACT ZZZZ, and must be reported according to the requirements in §63.6650. [§63.6640(b)]

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The following are only excerpts from the regulation or code, and are provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

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) 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 to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity 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, notice shall be given as soon as practicable prior to the activity.
- 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. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

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

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.

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

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 3) The permittee shall submit a full EIQ for the 2017 and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 4) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.

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 10-6.165 Restriction of Emission of Odors

This is a State Only permit requirement.

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

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-6.250 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.

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 at an installation:
 - 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”;
 - 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.

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)

- 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 40 CFR §82.106.
 - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.

- d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §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 of 40 CFR Part 82:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §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 40 CFR §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 contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*

V. General Permit Requirements

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

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

10 CSR 10-6.065, §(5)(E)2.C Extension of Expired Permits

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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

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

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

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

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

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

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

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

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

None

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

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

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

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

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

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

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

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

This permit may be reopened for cause if:

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

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

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

Attachment A
 Monthly VOC Tracking Record Installation-Wide

This recordkeeping sheet (from Construction Permit 032012-005) or an equivalent form may be used for the recordkeeping requirements of Permit Condition PW001.

This sheet covers the month of _____ in the year _____.

Column 1	Column 2	Column 3	Column 4	Column 5
EP-##	Tank/Reactor I.D. and Product	Amount of Product Stored/Produced (1000 gal)	Product Specific VOC Emission Factor (lbs VOC/1000 gal) (a)	VOC Emissions per Emission Unit (tons) (b)
(c) Total VOC emissions calculated for this month, in tons:				
(d) 12-month VOC emissions total from previous month's worksheet, in tons:				
(e) Monthly VOC emissions total (b) from previous year's worksheet, in tons:				
(f) Current 12-month total VOC emissions, in tons: [(b) + (c) - (d)]				

- Instructions:
- (a) Engineering calculations based on AP-42 equations or EPA's TANKs program can be used to produce emission factor.
 - (b) [Column 3] x [Column 4] x [0.0005] = [Column 5]
 - (c) Summation of [Column 5] and Startup, Shutdown, and Malfunction Emissions, in tons
 - (d) Record the previous 12-month VOC emissions total (e) from last month's worksheet, in tons
 - (e) Record the monthly VOC emissions total (b) from last year's worksheet, in tons
 - (f) Calculate the new 12-month VOC emissions total
- A 12-month VOC emissions total (f) of less than 100 tons indicates compliance.**

Attachment B
 Monthly Combined HAP Tracking Record Installation-Wide

This recordkeeping sheet (from Construction Permit 032012-005) or an equivalent form may be used for the recordkeeping requirements of Permit Condition PW001.

This sheet covers the month of _____ in the year _____ .

Column 1	Column 2	Column 3	Column 4	Column 5
EP-##	Tank/Reactor I.D. and Product	Amount of Product Stored/Produced (1000 gal)	Product Specific HAP Emission Factor (lbs HAP/1000 gal) (a)	HAP Emissions per Emission Unit (tons) (b)
(c) Total HAP emissions calculated for this month, in tons:				
(d) 12-month HAP emissions total from previous month's worksheet, in tons:				
(e) Monthly HAP emissions total (b) from previous year's worksheet, in tons:				
(f) Current 12-month total HAP emissions, in tons: [(b) + (c) - (d)]				

- Instructions:
- (a) Engineering calculations based on AP-42 equations or EPA's TANKs program can be used to produce emission factor.
 - (b) [Column 3] x [Column 4] x [0.0005] = [Column 5]
 - (c) Summation of [Column 5] and Startup, Shutdown, and Malfunction Emissions, in tons
 - (d) Record the previous 12-month HAP emissions total (e) from last month's worksheet, in tons
 - (e) Record the monthly HAP emissions total (b) from last year's worksheet, in tons
 - (f) Calculate the new 12-month HAP emissions total
- A 12-month HAP emissions total (f) of less than 25 tons indicates compliance.**

Attachment C

Monthly Individual HAP Tracking Record Installation-Wide

This recordkeeping sheet (from Construction Permit 032012-005) or an equivalent form may be used for the recordkeeping requirements of Permit Condition PW001.

This sheet covers the month of _____ in the year _____ .
 Name of Specific HAP _____

Column 1 (a)	Column 2 (b)
List Emission Unit from Attachment B which emits this specific HAP (Name, type)	HAP emissions from Attachment B [Column 5] (tons)
(c) Total HAP emissions calculated for this month, in tons:	
(d) 12-month HAP emissions total from last month’s worksheet, in tons:	
(e) Monthly HAP emissions total (b) from last year’s worksheet, in tons:	
(f) Current 12-month total of HAP emissions, in tons: [(c) + (d) – (e)]	

Instructions:

- (a) Individually list each Emission Unit which emits this specific HAP from the entire installation.
- (b) Record the amount of HAP emissions already calculated in Attachment B [Column 5], in tons.
- (c) Summation of Column 2 and Startup, Shutdown , and Malfunction Emissions, in tons
- (d) Record the previous 12-month individual HAP emissions total (f) from last month’s worksheet, in tons.
- (e) Record the monthly HAP emissions total (c) from previous year’s worksheet, in tons.
- (f) Calculate the current 12-month individual HAP emissions total.

A 12-month individual HAP emissions total of less than 10 tons indicates compliance.

Attachment E

VOC Emission Limitation Worksheet – EP-22, EP-106, EP-107, and EP-115 through EP-118

This recordkeeping sheet or an equivalent form may be used for the recordkeeping requirements of Permit Condition 6.

Tank ID	Month's Throughput		Emission Factor		Month's VOC Emissions	
EP-22: T-5215 (Breathing Loss)		Mgal	0.001	lb/Mgal		tons
EP-22: T-5215 (Breathing Loss)		Mgal	0.03	lb/Mgal		tons
EP-115: T-7001		gal	0.05	lb/gal		tons
EP-116: T-7002		gal	0.05	lb/gal		tons
EP-117: T-7003		gal	0.05	lb/gal		tons
EP-118: T-7004		gal	0.05	lb/gal		tons
EP-106: T-609		gal	0.01	lb/gal		tons
EP-107: T-611		gal	0.01	lb/gal		tons
Startup, Shutdown, and Malfunction VOC Emissions						tons
Total VOC Emission for this Month:						tons
12-month Cumulative VOC Emissions:						tons/year

Notes: Mgal = 1000 gallons

Emission factors have been taken from Construction Permit 0797-010.

A 12-month cumulative VOC emission of not more than 6.82 tons indicates compliance.

Attachment F
 VOC Emission Limitation Worksheet

This record keeping sheet or its equivalent form may be used for the recordkeeping requirements of Permit Condition 7.

This sheet covers the month of _____.
 (month, year)

Column 1	Column 2	Column 3	Column 4	Column 5
Date	Tank I.D. and Product	Amount of Product Produced (1000 gal)	Product-Specific VOC Emission Factor (lb VOC/1000 gal)	VOC Emissions per Tank (tons) (a)
	T-2306, Landstar		6.92	
	T-2307, Fallowstar		4.47	
	T-2556, Glyphosate 62		2.93	
	T-2557, Glyphosate 62		2.93	
Startup, Shutdown, Malfunction VOC Emissions, in tons:				
(b) Total emissions calculated for this month in tons:				
(c) Current 12-month total of emissions in tons:				

- (a) [Column 5] = [Column 3] x [Column 4] x 0.0005
 - (b) Total month emissions = [Column 5] + (Startup, Shutdown, Malfunction emissions)
 - (c) Summation of current month total emissions and eleven previous months
- *Emission factors have been taken from Construction Permit 032009-004.

A 12-month emissions total (c) of less than 40 tons indicates compliance.

Attachment H
 Monthly Individual 2-Methylnaphthalene Tracking Record

This recordkeeping sheet (from Construction Permit 032012-005) or an equivalent form may be used for the recordkeeping requirements of Permit Condition 9.

This sheet covers the month of _____ in the year _____ .
 Name of Specific HAP: 2-Methylnaphthalene

Column 1 (a)	Column 2	Column 3 (b)
Batched of Myclobutanil Produced	Emission Factor, in lbs/batch	Emissions this Month, in tons
	0.208	
(c) 12-month 2-methylnaphthalene emissions total from last month's Attachment, in tons:		
(d) Monthly 2-methylnaphthalene emissions total (b) from last year's Attachment, in tons:		
(e) Current 12-month total of HAP emissions, in tons: [(b) + (c) + (d)]		

Instructions:

- (a) List the number of batches of Myclobutanil produced this month.
- (b) Calculate the total 2-methylnaphthalene emissions for this month by [Column 2] x [Column 3] x 0.0005
- (c) Record the previous 12-month individual 2-methylnaphthalene emissions total (e) from last month's Attachment, in tons.
- (d) Record the monthly 2-methylnaphthalene emissions total (b) from previous year's Attachment, in tons.
- (e) Calculate the current 12-month individual 2-methylnaphthalene emissions total

A 12-month 2-methylnaphthalene emissions total of less than 0.01 tons indicates compliance.

STATEMENT OF BASIS

Voluntary Limitations

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

Installation Description

Albaugh, LLC manufacturing plant (Albaugh) manufactures, formulates, and packages a variety of herbicides, insecticides, and fungicides. Equipment utilized at the installation includes storage and mixing tanks, reaction vessels and other material handling and chemical processing equipment. The majority of the operations occur indoors.

The permittee has accepted voluntary, federally enforceable emissions limitations of less than 100 tons per year VOC emissions, less than 10 tons per year for any individual HAP and less than 25 tons per year for total HAPs in order to qualify for an Intermediate Operating Permit.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹
CO	1.21
HAP (Total)	< 25
HAP (Individual)	< 10
NO _x	5.62
PM ₁₀	1.02
PM ₂₅	0.86
SO _x	0.37
VOC	< 100

¹Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

Reported Air Pollutant Emissions, tons per year

Pollutants	2015	2014	2013	2012	2011
Volatile Organic Compounds (VOC)	33.24	30.54	47.52	38.36	34.9

Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, received October 14, 2014;
- 2) 2013 Emissions Inventory Questionnaire, received March 27, 2014;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) Construction Permit #0495-001, Issued March 17, 1995;
- 5) Construction Permit #0895-001, Issued July 28, 1995;
- 6) Construction Permit #1095-008, Issued September 25, 1995;
- 7) Construction Permit #1295-011, Issued November 22, 1995;
- 8) Construction Permit #1296-001, Issued November 18, 1996;
- 9) Construction Permit #0198-003, Issued December 24, 1997;
- 10) Construction Permit #1099-005, Issued September 24, 1999;
- 11) Construction Permit #0794-021, Issued July 15, 1994;
- 12) Construction Permit #0797-010, Issued June 25, 1997;
- 13) Construction Permit #032009-004, Issued March 10, 2009; and
- 14) Construction Permit #032012-005, Issued March 12, 2012.

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 that the following requirements are not applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100, Alternate Emission Limits

This rule is not applicable because the installation is in an ozone attainment area.

Construction Permit Revisions

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

- 1) Construction Permit #0486-005A authorized the installation of an esterification of 2,4-dichlorophenoxyacetic acid (2,4-D) process. Emission points authorized by this construction permit that are currently at the facility include T-6001 (EP-17), T-5101 (EP-32), T-5102 (EP-09), T-5202 (EP-12), T-5203 (EP-13), T-5210 (EP-20), and T-5214 (EP-08).
 - a) The following tanks were removed from the facility and are not included in the operating permit: T-5201, T-5204, T-5205, T-5206, T-5207, T-5208, T-5209, T-5211, T-5212, and T-5213.
 - b) This construction permit indicated that 10 CSR 10-2.030, *Restriction of Emission of Particulate Matter from Industrial Processes*, is an applicable regulation. However, this rule was rescinded

on March 30, 2001, and replaced by 10 CSR 10-6.400. 10 CSR 10-6.400 is not applied because the emission units do not have the potential to emit PM at a rate greater than or equal to 0.5 lb/hr and according to §(1)(B)(12), emission units that at a maximum design capacity have a potential to emit less than 0.5 lb/hr of particulate matter are exempt.

- 2) Construction Permit #0794-021 authorized the installation of R-6002 (EP-01), a 3,000-gallon reactor used to produce 2,4-dichlorophenoxyacetic acid (2,4-D).
 - a) By the authorization of Construction Permit #0198-003, R-6002 (EP-01) was replaced in 1998 with a 5,000-gallon reactor. Construction Permit #0198-003 did not revoke the Special Conditions in Construction Permit #0794-021. Consequently, these special conditions are listed in Permit Condition 1.
 - b) Special Condition 2 requires that the records be kept for at least 24-months. However, state operating permit regulations requires records to be kept for a minimum of five (5) years.
 - c) The Applicable Emission Regulations section of this construction permit indicated that 10 CSR 10-2.060, *Restriction of Emission of Visible Air Contaminants*, is an applicable regulation. 10 CSR 10-2.060 was rescinded on May 30, 2000 and replaced by 10 CSR 10-6.220. 10 CSR 10-6.220 is not applied to these units since it is highly unlikely that this equipment would ever exceed the 20% opacity threshold required by this rule.
 - d) The Applicable Emission Regulations section of this construction permit indicated that 10 CSR 10-3.050, *Restriction of Emission of Particulate Matter from Industrial Processes*, is an applicable regulation. 10 CSR 10-2.030 was rescinded on March 30, 2001 and replaced by 10 CSR 10-6.400. This rule is not applied because R-6002 (EP-01) does not have the potential to emit PM at a rate greater than or equal to 0.5 lb/hr and according to §(1)(B)(12), emission units that at a maximum design capacity have a potential to emit less than 0.5 lb/hr of particulate matter are exempt.
- 3) Construction Permit #0495-001 authorized the installation of two 3,500-gallon premix tanks and 2,4-D acid dump station.
 - a) The premix tanks and acid drop station were removed under Project #2001-11-37. These units are not included in the operating permit.
 - b) The restriction of odor special condition has been included in the Core Requirements of this operating permit.
- 4) Construction Permit #0895-001 authorized the installation of eight storage tanks: T-1701 through T-1705 (EP-119 – EP-123) and T-1709 through T-1711 (EP-127 – EP-129).
 - a) There are no revisions to this construction permit.
 - b) The restriction of odor special condition has been included in the Core Requirements of this operating permit.
- 5) Construction Permit #1095-008 authorized the installation of R-5302 (EP-24), R-5353 (EP-24), R-6003 (EP-24), and R-6004 (EP-24).
 - a) Special Condition 1 refers to a required stack test of an acid dumping station. Since the test was required to be completed in 1995 and the acid dumping station was removed from the facility in 2001, Special Condition 1 is not included in the operating permit.
 - b) The restriction of odor special condition has been included in the Core Requirements of this operating permit.
- 6) Construction Permit #1295-011 authorized the installation of T-6002 (EP-26).
 - a) The restriction of odor special condition has been included in the Core Requirements of this operating permit.
- 7) Construction Permit #1296-001 authorized the installation of T-5218 (EP-10).

- a) The restriction of odor special condition has been included in the Core Requirements of this operating permit.
- 8) Construction Permit #0797-010 authorized the installation of eleven storage tanks. The storage tanks authorized by this construction permit that are currently at the facility include T-5215 (EP-22), T-7001 (EP-115), T-7002 (EP-116), T-7003 (EP-117), T-7004 (EP-118), T-609 (EP-106), and T-611 (EP-107).
 - a) The following tanks have been removed from the facility: T-404, T-405, T-406, and T-705. These units are not included in the operating permit.
 - b) The Applicable Requirement section of this construction permit indicated that 40 CFR Part 60 subpart Kb is applicable to T-5215 (EP-22). However, this rule was amended on October 15, 2003 (68 FR 59332) to exclude storage tanks with capacities less than 75 m³ (19,810 gallons). Since T-5215 (EP-22) is 12,700 gallons, this rule is not applicable.
- 9) Construction Permit #1197-004 authorized the installation of T-5405 (EP-28), T-5410 (EP-29), T-5415 (EP-30), and T-5420 (EP-31).
 - a) There are no revisions to this construction permit.
- 10) Construction Permit #0198-003 authorized the installation of R-6002 (EP-01), T-6201 (EP-01), and T-6202 (EP-01).
 - a) T-6201 and T-6202 were mislabeled as R-6201 and R-6202 in the construction permit.
 - b) The restriction of odor special condition has been included in the Core Requirements of this operating permit.
- 11) Construction Permit #0498-020 authorized the installation of T-407 (EP-88), T-706 (EP-112), T-707 (EP-113) and T-708 (EP-114).
 - a) The Applicable Requirement section of this construction permit indicated that 40 CFR Part 60 subpart Kb is applicable to storage tanks T-706 (EP-112), T-707 (EP-113), and T-708 (EP-114). However, this rule was amended on October 15, 2003 (68 FR 59332) to exclude storage tanks with capacities less than 75 m³ (19,810 gallons). Since these tanks each have a capacity less than 19,810-gallons, this rule is not applicable.
- 12) Construction Permit #1099-005 authorized the installation of twenty storage tanks. The storage tanks authorized by this construction permit that are currently at the facility include T-2201 through T-2210 (EP-33 through EP-41), T-2211 through T-2216 (EP-43 through EP-48), and T-2301 through T-2303 (EP-49 through EP-51).
 - a) T-2304 (EP-52) was removed from the facility and is not included in the operating permit.
 - b) The applicable Requirement section of this construction permit indicated that 10 CSR 10-2.060, *Restriction of Emission of Visible Air Contaminants*, is an applicable regulation. 10 CSR 10-2.060 was rescinded on May 30, 2000 and replaced by 10 CSR 10-6.220. 10 CSR 10-6.220 is not applied to these units since it is highly unlikely that equipment would ever exceed the 20% opacity threshold required by this rule.
 - c) The restriction of odor special condition has been included in the Core Requirements of this operating permit.
- 13) Construction Permit #112000-015 authorized the installation of T-1901 through T-1906 (EP-61 through EP-66), T-2001 (EP-67), R-2001 (EP-68), R-2002 (EP-69), R-2401 though R-2403 (EP-70 through EP-72), and T-2401 through T-2405 (EP-73 through EP-77).
 - a) The Applicable Requirement section of this construction permit indicated that 40 CFR Part 60 Subpart Kb is applicable to the storage tanks listed below. However, this rule was amended on October 15, 2003 (68 FR 59332) to exclude storage tanks with capacities less than 75 m³ (19,810 gallons). Since the storage tanks have capacities below 19,810 gallons, this rule is not applicable.

EQ EP #	Tank #	Capacity (gallons)
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EP-61	T-1901	17,120
EP-62	T-1902	15,660
EP-63	T-1903	15,660
EP-64	T-1904	15,660
EP-65	T-1905	15,660
EP-66	T-1906	15,660
EP-69	R-2002	6,220
EP-70	R-2401	10,890
EP-71	R-2402	10,890
EP-72	R-2403	10,890
EP-73	T-2401	11,860
EP-74	T-2402	15,660
EP-75	T-2403	17,120
EP-76	T-2404	17,120
EP-77	T-2405	11,860

Note: The EIQ EP ID numbers were changed by the facility; the numbers listed above are the current EIQ EP ID numbers.

- b) The Applicable Requirement section of this construction permit indicated that 10 CSR 10-2.060, *Restriction of Emission of Visible Air Contaminants*, is an applicable regulation. 10 CSR 10-2.060 was rescinded on May 30, 2000, and replaced by 10 CSR 10-6.220. 10 CSR 10-6.220 is not applied to these units since it is highly unlikely that equipment would ever exceed the 20% Opacity threshold required by this rule.

14) Construction Permit #012005-007 authorized the installation of a new glyphosate process that includes 54 emission units.

- a) Attachment A of this construction permit indicated which emission units are subject to 40 CFR Part 60 Subpart Kb. However, several of the emission units that are listed as subject to subpart Kb do not meet the capacity criteria for the rule. The following table lists the emission units authorized by this construction permit that are currently at the facility, the capacity of the reactors, and storage/mixing tanks, and the applicability of subpart Kb.

EP-##	Emission Point Description	Capacity (gallons)	Subpart Kb
EP-136	T-2501	7,200	Not Applicable
EP-137	T-2502	7,200	Not Applicable
EP-138	T-2503	1,270	Not Applicable
EP-139	R-2501	11,860	Not Applicable
EP-140	R-2502	11,860	Not Applicable
EP-141	R-2503	11,860	Not Applicable
EP-142	R-2504	11,860	Not Applicable
EP-143	R-2505	11,860	Not Applicable
EP-144	R-2506	11,860	Not Applicable
EP-145	R-2507	11,440	Not Applicable
EP-146	R-2508	11,440	Not Applicable

EP-##	Emission Point Description	Capacity (gallons)	Subpart Kb
EP-151	T-2508	2,540	Not Applicable
EP-152	T-2509	2,540	Not Applicable
EP-153	T-2510	2,540	Not Applicable
EP-154	T-2511	2,540	Not Applicable
EP-155	T-2512	27,670	Applicable
EP-156	T-2513	27,670	Applicable
EP-157	T-2514	18,450	Not Applicable
EP-158	T-2515	27,670	Applicable
EP-159	T-2516	27,670	Applicable
EP-160	T-2517	27,670	Applicable
EP-161	T-2518	27,670	Applicable
EP-162	T-2519	18,450	Not Applicable
EP-163	T-2520	27,670	Applicable
EP-164	T-2521	27,670	Applicable
EP-165	T-2522	27,670	Applicable
EP-166	T-2523	27,670	Applicable
EP-167	T-2524	27,670	Applicable
EP-168	T-2525	27,670	Applicable
EP-171	E-2501	NA	Not Applicable
EP-172	T-2528	10,170	Not Applicable
EP-173	T-2529	10,170	Not Applicable
EP-174	T-2530	516,540	Applicable
EP-175	T-2531	516,540	Applicable
EP-176	T-2532	516,540	Applicable
EP-177	T-2533	516,540	Applicable
EP-178	T-2534	516,540	Applicable
EP-185	T-2541	31,770	Applicable
EP-186	T-2542	31,770	Applicable
EP-187	T-2543	31,770	Applicable
EP-188	T-2544	31,770	Applicable
EP-189	T-2545	31,770	Applicable
EP-190	T-2546	31,770	Applicable
EP-191	T-2547	31,770	Applicable
EP-192	T-2548	31,770	Applicable
EP-193	T-2549	31,770	Applicable
EP-194	T-2550	31,770	Applicable
EP-195	T-2551	31,770	Applicable

- b) Tank T-2535 (EP-179) was never built and therefore is not included in the operating permit.
- 15) Construction Permit #032009-004 authorized the installation of T-2306, T-2307, T-2556, and T-2557 (EP-226 through EP-229).
 - a) The Applicable Emission Regulations section of this construction permit indicated that 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*, is an applicable regulation. This rule is not applied because according to §(1)(B)(12), emission units

that at a maximum design capacity have a potential to emit less than 0.5 lb/hr of particulate matter are exempt. (See **Other Regulatory Determinations** for calculations)

- b) The Applicable Emission Regulations section of this construction permit indicated that 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*, is an applicable regulation. This rule is not applied to these units since it is highly unlikely that the equipment would ever exceed the 20% opacity threshold required by this rule.
- 16) Construction Permit #032012-005 authorized the installation of four (4) Storage Tanks (T-501, T-502, T-503, T-504), four (4) reactors (R-501, R-502, R-503, R-504), and a mixer (M-501).
- a) There are no revisions to this construction permit.

New Source Performance Standards (NSPS) Applicability

- 1) 40 CFR Part 60 Subpart K, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978.*
 - a) There are no petroleum liquid storage vessels at the facility that meet the storage capacity and/or the date of construction specification for applicability of this rule.
- 2) 40 CFR Part 60 Subpart Ka, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984.*
 - a) There are no petroleum liquid storage vessels at the facility that meet the storage capacity and/or the date of construction specification for applicability of this rule.
- 3) 40 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 applies to a storage vessel with a capacity greater than or equal to 75 cubic meters (19,810 gallons) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.
 - b) This rule has not been applied to T-6002 (EP-26) because Construction Permit #1295-011 limits the contents stored to 2,4-Dichlorophenoxyacetic Acid, 2-Ethylhexyl Ester, which has a maximum true vapor pressure below 15 kPa (2.18 psi).
 - c) This rule is not applied to the following storage tanks because they were manufactured prior to 1984.

Emission Point Description	Capacity (gallons)	Manufacture Date
T-601	35,261	1972
T-5101	30,496	1973
T-5102	30,496	1973
T-5203	34,308	1973
T-5214	30,496	1973

- d) This rule requires that the various records be kept for at least two (2) years. However, state operating permit regulations require records to be kept for a minimum of five (5) years.
- 4) 40 CFR Part 60 Subpart RRR, *Standards of Performance for Volatile Organic Compound Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes*
- a) This rule applies to each affected facility that is part of a process unit that produces any of the chemicals listed in §60.707 as a product, co-product, by-product, or intermediate. The permittee

does not produce any of the chemicals listed in §60.707 as a product, co-product, by-product, or intermediate. Therefore, the permittee is not subject to this rule.

There are no other NSPS standards that apply.

Maximum Achievable Control Technology (MACT) Applicability

None

Other Regulatory Determinations

1) 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*

This regulation has not been applied to this operating permit since it is highly unlikely that the emission units would exceed the 20% opacity threshold required by this rule.

2) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*

a) The Solid Transfer or Dumping Operations. The process for transferring solids to the mix tanks is to hold the bags (super sacks) over the top of the tank with a lift and cut the bottom of the bag. The solids fall through a hopper attached to the top manway. A fabric filter is connected to the top of the tank, creating a slight negative pressure, and sucks dust into the tank where it is either consumed in the process or collected on the filter. 10 CSR 10-6.400 is not applied to the solid transfer or dumping operations at the facility because according to §(1)(B)(12), emission units that at a maximum design capacity have a potential to emit less than 0.5 lb/hr 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 is 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-##	Emission Point Description	Product	MHDR (ton/hr)	PM Emission Factor (lb/ton)	PTE (lb/hr)
EP-24-1	T-5353	2,4-D	5.4	0.024	0.130
EP-24-2	T-5355	Triclopyr	5.4	0.024	0.130
EP-68	R-2001	2,4-D + Picrolam	5.4	0.024	0.130
EP-69	R-2002	Picrolam	5.4	0.024	0.130
EP-70	R-2401	2,4-D	5.4	0.024	0.130
EP-71	R-2402	Dicamba	5.4	0.024	0.130
EP-72	R-2403	2,4-D + Dicamba	5.4	0.024	0.130
EP-87	T-403	Trifluralin	2.75	0.024	0.066
EP-93	Hopper	MCPA	5.4	0.024	0.130
EP-98	T-601	Bromoxynil	2.1	0.024	0.050
EP-99	T-602	2,4-D	2.91	0.024	0.070
EP-100	T-603	Bromoxynil	2.1	0.024	0.050
EP-101	T-604	2,4-D + Clopyralid	5.4	0.024	0.130
EP-102	T-605	Dicamba	2.65	0.024	0.064
EP-103	T-606	MCPA	5.4	0.024	0.130
EP-136	T-2501	PMDA	5.4	0.024	0.130
EP-137	T-2502	PMDA	5.4	0.024	0.130
EP-138	T-2503	Carbon	5.4	0.024	0.130

EP-172	T-2528	Glyphosate	5.4	0.024	0.130
EP-173	T-2529	Glyphosate	5.4	0.024	0.130
EP-215	T-2616	2,4-DB	5.4	0.024	0.130
EP-216	T-2617	Triclopyr	5.4	0.024	0.130
EP-217	T-2618	Fluroxypyr	5.4	0.024	0.130
EP-218	T-2619	Clopyralid	5.4	0.024	0.130
EP-219	T-2620	Dicamba	5.4	0.024	0.130
EP-226	T-2306	Imazethapyr	1.95	0.024	0.047
EP-227	T-2307	Imazethapyr	0.76	0.024	0.018
EP-228	T-2556	Glyphosate	5.4	0.024	0.130
EP-229	T-2557	Glyphosate	5.4	0.024	0.130

Note: A PM₁₀ emission factor of 0.012 lb/ton of material dumped was given in the Emissions/Control Evaluation Section of Construction Permit #032009-004. This emission factor was based on emissions testing conducted in 1995 at the St. Joseph facility. Since there are no PM emission factors available, it was assumed that PM = 2 x PM₁₀ (i.e. 2 x 0.012 = 0.024 lb/ton)

- 3) The following storage/mixing tanks and reactors have been removed from the facility and are not included in the operating permit:
 - a) T-403 (EP-90) removed 2008
 - b) T-404 removed 2003
 - c) T-405 removed 2003
 - d) T-406 removed 1998
 - e) R-402 removed 2001
 - f) R-403 removed 2001
 - g) T-701 removed 2001
 - h) T-702 removed 2001
 - i) T-703 removed 1998
 - j) T-704 removed 1998
 - k) T-705 removed 2007
 - l) T-2304 (EP-52) removed 2008
 - m) T-5205 (EP-24) removed 2001
- 4) The following solid transfer/dumping emission points have been removed from the facility and are not included in the operating permit:
 - a) Dump station Esterification process (EP-95)
 - b) Dump station Dicamba salt mixing (EP-96)
 - c) Dump Station (EP-97)
- 5) Permit Condition 2
 - a) No reporting is required as long as the permittee maintains the required design of the tanks as required by the construction permit.
- 6) Permit Condition 5
 - a) No reporting is required as long as the permittee maintains the required design of the tanks as required by the construction permit.

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

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.
- 4) The installation does not contain the type of emission unit which is regulated by that rule.
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Response to Public Comments

A draft of Albaugh LLC's Part 70 Operating Permit was placed on public notice on May 01, 2015, by the Missouri Department of Natural Resources (MDNR). Comments were received on June 03, 2015 from Mark Smith, Air Permitting and Compliance Branch Chief at Environmental Protection Agency Region 7. The seven (7) comments are presented below as submitted, with the response to each comment by the Air Pollution Control Program (APCP) directly following.

EPA Comment #1:

Permit Condition PW001 incorporates voluntary emission limitations of less than 100 tons in any consecutive twelve month period of volatile organic compounds (VOC) and less than ten (10) tons of any individual hazardous air pollutant (HAP) and less than twenty-five (25) tons of total HAPs in any consecutive twelve-month period. Albaugh-St. Joseph has taken these voluntary limits on VOC and HAP emissions to remain below the major level in order to obtain this Intermediate State Permit to Operate. However, EPA cannot determine whether or not these VOC and HAP emission limitations are enforceable from a practical matter because these emission limitations, as presented in this draft operating permit, fail to identify the emission units subject to these limitations.

In its response to a petition against an operating permit issued to Hu Honua Bioenergy Facility, the Environmental Protection Agency granted the petitioners contention that the operating permit failed to ensure the enforceability as a practical matter because the permit was unclear whether all actual emissions were considered in determining compliance. Specifically, the permit failed to include emissions from malfunctions or upset conditions, although the permit did address start-up and shutdown emissions. Additionally, the Environmental Protection Agency also granted the petitioners claim that, for purposes of determining the potential-to-emit (PTE) of a stationary source, the PTE shall encompass the maximum capacity of a stationary source to emit pollutants under its physical and operational design. Thus, emissions for all emission units that are part of the source's physical and operational design must be included in calculating PTE for purposes of determining VOC and HAP voluntary limit compliance, including emission units that have been designated as without limitations and any designated insignificant activities.

Permit Condition PW001, in the Albaugh-St. Joseph draft operating permit, is unclear whether or not all emission units with the potential –to-emit VOC and HAP are considered in the determination of compliance. Therefore, EPA believes Permit Condition PW001 is not practically enforceable and recommends MDNR provide the additional detail as to what emission units Albaugh-St. Joseph includes to assure compliance with the voluntary limit.

Missouri Air Pollution Control Program Response to EPA Comment #1:

It has been clarified in the operating permit that Plant Wide Emission Limitations apply to all emission units listed in Section I under Emission Units with Limitations or Emission Units without Limitations.

EPA Comment #2:

Permit Condition 1 incorporates, into the operating permit, applicable requirements from Construction Permit #0791-021, issued July 15, 1994. However, the construction permit issued July 15, 1994 is #0794-021 and EPA suggests MDNR correct the Construction Permit # in Permit Condition 1 and in the listing of Permit Reference Documents in the Statement of Basis.

Also, the *Monitoring* requirement and both *Record keeping* requirements in Permit Condition 1 are not enforceable from a practical matter. Each operating permit condition must be practically enforceable and EPA's guidance on practical enforceability defines a practically enforceable permit condition as one which answers "who," "what," "where," "when," "how" and "how often." The Monitoring and both Record keeping requirements are written as statements of fact and none define the "who," "where," "when," "how" and "how often" and therefore EPA recommends MDNR modify these requirements to ensure practical enforceability.

Finally, the *Monitoring* requirement requires the permittee to maintain all emission controls proposed in the Construction Permit #0794-021 application. 10 CSR 10-6.065(5)(C)1 requires every Intermediate State Permit to Operate to include all requirements applicable to the facility at the time of operating permit issuance. A reference to the proposed emission controls in a construction permit application; which is not included as an attachment to the operating permit appears to fail to meet the requirement of MDNR's regulations. Also, this construction permit application is not listed in the Statement of Basis as a document relied upon in the preparation of this operating permit. Therefore, EPA strongly recommends MDNR detail the monitoring, Albaugh-St. Joseph undertakes on the emission controls installed as part of Construction Permit #0794-021, in Permit Condition 1.

Missouri Air Pollution Control Program Response to EPA Comment #2:

The Construction Permit # was corrected in the header box for Permit Condition 1 and has been included as a referenced document in the Statement of Basis.

The monitoring and recordkeeping requirements have been modified to make them practically enforceable.

EPA Comment #3:

The *Operational Specifications* in **Permit Condition 2; Permit Condition 3; and Permit Condition 5** are not enforceable from a practical matter. Each operating permit condition must be practically enforceable and EPA's guidance on practical enforceability defines a practically enforceable permit condition as one which answers "who," "what," "where," "when," "how" and "how often." The Operational Specifications in Permit Condition 2 and 3 appear to be written as statements of fact and none of them identifies the "who," "what," "where," "when," "how" and "how often" and therefore EPA recommends MDNR modify these requirements to be enforceable.

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

The operational specifications have been modified to make them practically enforceable.

EPA Comment #4:

The *Testing* requirement 1) in **Permit Condition 4** and **Permit Condition 8** are not enforceable from a practical matter. Each operating permit condition must be practically enforceable and EPA's guidance on practical enforceability defines a practically enforceable permit condition as one which answers "who," "what," "where," "when," "how" and "how often." The *Testing* requirement 1), in Permit Conditions 4 and 8, appear to be written as statements of fact and none of them identifies the "who," "what," "where," "when," "how" and "how often" and therefore EPA recommends MDNR modify these requirements to be enforceable.

Additionally, *Testing* requirement 2) in **Permit Condition 4** and **Permit Condition 8** both identify the individual responsible for compliance as the "owner or operator." It is MDNR customary practice to identify the "permittee" as the individual responsible for compliance verification in operating permit requirements. EPA suggests MDNR use their customary compliance individual throughout the Albaugh-St. Joseph operating permit and replace "owner or operator" with "permittee."

Missouri Air Pollution Control Program Response to EPA Comment #4:

The testing requirements have been modified to make them practically enforceable.

The individual responsible in these permit conditions have been changed from the "owner or operator" to the "permittee".

EPA Comment #5:

The *Record keeping* requirement in **Permit Condition 6** requires permittee to use Attachment E, or any substantially conforming form that contains the same information, to maintain an accurate monthly record of VOC emissions from identified emission units. However, EPA finds that Attachment E is not enforceable from a practical matter because it uses unsubstantiated emission factors for emission determination. Therefore, EPA recommends MDNR provide a reference or source of the emission factors used on Attachment E.

Missouri Air Pollution Control Program Response to EPA Comment #5:

The source of the emission factors have been included on Attachment E.

EPA Comment #6:

The *Record keeping* requirement in **Permit Condition 7** is not enforceable from a practical matter. Each operating permit condition must be practically enforceable and EPA's guidance on practical enforceability defines a practically enforceable permit condition as one which answers "who," "what," "where," "when," "how" and "how often." The Record keeping requirement in Permit Conditions 7 appears to be written as a statement of fact and does not identifies the "who," "what," "where," "when," "how" and "how often" and therefore EPA recommends MDNR modify this requirement to be enforceable.

Additionally, the *Record keeping* requirement in **Permit Condition 7** requires permittee to use Attachment F, or equivalent to maintain an accurate monthly record of VOC emissions from identified emission units. However, EPA finds that Attachment F is not enforceable from a practical matter because it uses unsubstantiated emission factors for emission determination. Therefore, EPA recommends MDNR provide a reference or source of the emission factors used on Attachment F.

Missouri Air Pollution Control Program Response to EPA Comment #6:

The recordkeeping requirements have been modified to make them practically enforceable.

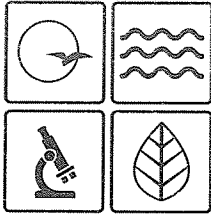
The source of the emission factors have been included on Attachment F.

EPA Comment #7:

The language regarding the written notification requirement for Off-Permit Changes in Section V used in operating permits has recently been modified to more closely match the wording in 10 CSR 10-6.065(6)(C)5. Therefore, EPA recommends MDNR use the newer Off-Permit Change wording in the Albaugh-St. Joseph operating permit.

Missouri Air Pollution Control Program Response to EPA Comment #7:

10 CSR 10-6.065(6)(C)5. has been updated to the current language used by the Air Pollution Control Program.



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NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

MAR 28 2017

Mr. Spencer Vance
Albaugh, Inc.
4900 Stockyards Expressway
St. Joseph, MO 64504

Re: Intermediate Operating Permit Renewal
Installation ID: 021-0037, Permit Number: OP2017-028

Dear Mr. Vance:

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


This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM


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

MJS/dbj

Enclosures

c: PAMS File: 2014-10-041



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